

Contents

Appendix 1 National Highways EEBC SoCG signed May 25 redacted	2
Appendix 2 - SoCG09 - SoCG11	9
Appendix 2 Historic England EEBC SoCG May 25 redacted	10
Appendix 2 SCG10 Environment Agency EEBC SoCG signed May 25	15
Appendix 2 SCG11 NHSPS EEBC SoCG signed May 25	23
Appendix 3 SoCG emails	32
Appendix 4 - DtC Timeline of meetings	38
Appendix 5 DtC Responses to 18 November 23 letter for assistance	76
Appendix 6 DtC draft Framework combined (1)	96
Duty To Cooperate Framework: Consultation Draft	97
Duty To Cooperate Framework: Table of Issues	121
Duty To Cooperate Framework: Consultation email example	126
Duty To Cooperate Framework: Consultation response summary	126
Duty To Cooperate Framework: Consultation responses	131
Appendix 7 DtC Responses to 10 July 24 letter for assistance	170
Appendix 8 DtC Minutes	188
London Borough of Sutton: 27/09/23	189
Surrey County Council: 27/09/23	194
Royal Borough of Kingston Upon Thames: 14/05/24	197
Reigate & Banstead Borough Council: 21/02/25/274	201
Mole Valley District Council: 23/05/24	206
Surrey County Council: 11/06/24	211
London Borough of Sutton: 09/10/24	216
Elmbridge Borough Council: 17/10/24	220
London Borough of Sutton: 20/01/25	223
Mole Valley District Council: 20/01/25	226
Surrey County Council: 29/01/25	228
Elmbridge Borough Council: 30/1/25	231
Royal Borough of Kingston Upon Thames: 30/02/25/275	234
Reigate & Banstead Borough Council: 31/01/25	237
Appendix 9 - BNG documents	239
Appendix 9a Position Statement - Surrey Nature Partnership.pdf	240
Appendix 9b state-of-surreys-nature report (2017).pdf	243

Statement of Common Ground

This Statement of Common Ground (SoCG) is between Epsom & Ewell Borough Council (EEBC) and National Highways (NH) in relation to the Epsom & Ewell Local Plan 2040.

1) Constituent parties to this SOCG

Epsom & Ewell Borough Council (EEBC)
National Highways (NH)

2) Background

This SOCG sets out the agreed position as at May 2025 in relation to strategic highways matters and Epsom and Ewell Borough Council's (EEBC) Proposed Submission Local Plan.

National Highways (NH) was appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such, NH works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as providing effective stewardship of its long-term operation and integrity.

NH is therefore concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. In relation to the administrative area of EEBC, there is no part of the SRN which passes through the borough.

The M25 lies to the south, with most of the traffic from the borough that use the SRN being likely to pass through M25 J9, with some potential small impacts on M25 J8.

3) Local Plan engagement and outcomes

EEBC has engaged NH during the preparation of the Local Plan. This has included engagement on the evidence base, specifically the Strategic Highways Modelling Assessment Report (2024) as well as consultation at the Regulation 18 and 19 formal consultation stages. Details of this are provided below:

Regulation 18 Draft Local Plan

NH responded to the Regulation 18 consultation. The response highlighted that the closest junction of the strategic road network (SRN) to the borough is the M25 J9. It confirmed that no part of the SRN is within EEBC's administrative area. NH stated that a robust evidence base is required to enable them to constructively engage in the local plan making process and provide sound advice in relation to the appropriateness of proposed development and the impact on the SRN. Overall NH were in support of the relevant policies within the Regulation 18 draft Local Plan.

Strategic Highways Modelling Assessment Report (SHMAR)

Following the Regulation 18 consultation, EEBC commissioned Surrey County Council to undertake a strategic highways assessment of the potential impacts of the emerging Local Plan on the highways network. NH were sent the resulting Strategic Highways Assessment Report in November 2024 for review and responded with queries/comments. SCC and NH engaged on these queries/comments, which were resolved in April 2025.

Regulation 19 Proposed Submission Local Plan

The Regulation 19 Proposed Submission Local Plan consultation was undertaken from 20 December 2024 to 5 February 2025. NH responded to the consultation, key points from which are set out below. The full response is provided in appendix 1.

“Transport Policies:

Policy S19 relating to transport contains the necessary requirements for Transport Assessments and Travel Plan to be included for new development proposals. We would highlight that where development is likely to place significant numbers of trips through SRN junctions, they should also assess the impact they may have on the SRN within the Transport Assessment.

National Highways welcomes the demand management measures included within this policy including the promotion of car-free development in appropriate locations. We recognise that reducing levels of vehicle parking at source can have a significant impact on reducing the impact on the highway network, therefore we encourage development in locations which are well-connected by public transport to take account of this when setting parking levels.

Housing Allocations:

As per policy S1, we note that the plan has allocated sites to achieve at least 4,700 new dwellings during the plan period. The housing allocations are varied in both size and location, with approximately one third being provided on urban brownfield sites. There are five new greenfield sites proposed,

providing a total of 1,580 dwellings out of the 4,700 total. These are mostly focused on the north of the borough, furthest away from the SRN. National Highways would nonetheless expect these to be sustainable sites which encourage a modal shift away from car travel to limit the impact on the highway network, through enabling active and sustainable public transport.

Should any Supplementary Planning Documents be produced regarding any of the larger development sites containing elements that could affect the SRN, National Highways would expect to be consulted.

Employment Allocations:

There are no specific, large employment sites allocated within the Local Plan. Instead, policy DM7 allocates two existing industrial estates in the borough as Strategic Employment Sites which have the highest level of protection for employment uses. No significant expansion of these sites is proposed, and they are both over 5 miles from the SRN. National Highways therefore does not have any comment to make regarding proposed employment allocations.

It should nonetheless be ensured that any application for significant amounts of new employment floorspace, whether on new sites or expansions to existing sites, includes a comprehensive assessment of the impact of the proposals on the road network and where close to a SRN junction, includes full turning movements. Junction capacity assessments may be required for proposals which place a larger number of development trips through SRN junctions. This is particularly likely to be the case for any large new employment sites which may come forward in the south of the borough, outside of existing employment areas.

Transport Evidence Base & Infrastructure Delivery Plan:

A Strategic Highways Modelling Report (SHMR) dated October 2024 is included within the Regulation 19 consultation. This work forms a key piece of evidence to demonstrate that the Local Plan is sound, therefore it is important that any identified mitigation which the plan or its allocations are reliant upon has a reasonable prospect of delivery within the timescales of when the identified growth is planned. As noted above, National Highways have already had discussions with Epsom & Ewell Borough Council about this report and we will continue to liaise with the Council to resolve our outstanding requests for information.

Having reviewed the updated Infrastructure Delivery Plan (IDP) dated November 2024, there are no significant transport schemes proposed which will have a significant impact on the SRN. Should this change due to any further work undertaken on the Strategic Highways Modelling Report (SHMR), we would expect that an updated IDP would be prepared.”

The response does not highlight any significant concerns with the Proposed Submission Local Plan and confirms that NH, the planning authority (EEBC)

and the Highways Authority (SCC) are still liaising over the supporting transport evidence (the Strategic Highways Modelling Assessment Report).

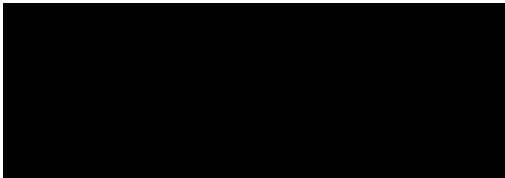
4) Positions of the parties

Both parties agree:

- NH do not have any significant concerns in relation to the Proposed Submission Local Plan
- NH raised a number of queries/points of clarification in relation to the Strategic Highways Modelling Assessment Report, which have now been resolved.

5) Signatories

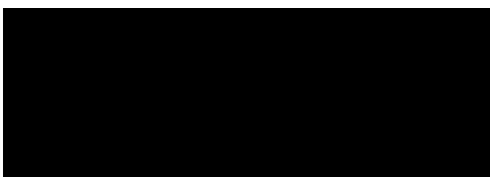
Epsom & Ewell Borough Council



Councillor Peter O'Donovan
Chair of Licencing and Planning Policy Committee

Date: 7 May 2025

National Highways



Janice Burgess
Spatial Planner

Date: 2 May 2025

Appendix 1: NH Regulation 19 Representation

Dear [REDACTED]

NH/24/09489

Proposed Submission Epsom and Ewell Local Plan Consultation (Regulation 19)

Thank you for inviting National Highways to comment on the Epsom & Ewell Local Plan 2040 Pre-Submission Draft (Regulation 19).

National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. In relation to the Epsom & Ewell borough area, the SRN comprises the M25 south of the borough. In particular, the majority of traffic from the borough using the SRN is likely to pass through M25 J9, with some potential small impacts on M25 J8. No part of the SRN passes through the borough, therefore we do not have any boundary concerns.

Overall, in accordance with national policy, we look to your Local Plan to promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. We welcome the Council's vision in chapter 2 of the plan to provide sustainable development with a focus on reducing carbon emissions whilst promoting active travel and public transport use to limit car journeys and congestion locally, and on the wider network.

We would be concerned if any material increase in traffic were to occur on the SRN or at its junctions because of planned growth within the borough, without careful consideration of mitigation measures. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure being in place. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN.

National Highways are currently liaising with the Council regarding the Strategic Highways Modelling Report which we received in November 2024. The council have recently responded to our comments in January 2025 and have provided additional information including additional flow diagrams which we requested. Work is currently underway to review this additional information

and a response will be provided separately. It is recommended that a Statement of Common Ground (SoCG) should be agreed between National Highways and the Council to determine and agree the scope of any outstanding work necessary to assess the impact of the Local Plan on the SRN.

Our responses to Local Plan consultations are guided by relevant policy and guidance including the DfT Circular 01/2022 and National Planning Policy Framework (December 2023) (NPPF). We have reviewed the available information regarding policies contained within the Local Plan, our comments are set out below:

Transport Policies:

Policy S19 relating to transport contains the necessary requirements for Transport Assessments and Travel Plan to be included for new development proposals. We would highlight that where development is likely to place significant numbers of trips through SRN junctions, they should also assess the impact they may have on the SRN within the Transport Assessment. National Highways welcomes the demand management measures included within this policy including the promotion of car-free development in appropriate locations. We recognise that reducing levels of vehicle parking at source can have a significant impact on reducing the impact on the highway network, therefore we encourage development in locations which are well-connected by public transport to take account of this when setting parking levels.

Housing Allocations:

As per policy S1, we note that the plan has allocated sites to achieve at least 4,700 new dwellings during the plan period. The housing allocations are varied in both size and location, with approximately one third being provided on urban brownfield sites. There are five new greenfield sites proposed, providing a total of 1,580 dwellings out of the 4,700 total. These are mostly focused on the north of the borough, furthest away from the SRN. National Highways would nonetheless expect these to be sustainable sites which encourage a modal shift away from car travel to limit the impact on the highway network, through enabling active and sustainable public transport.

Should any Supplementary Planning Documents be produced regarding any of the larger development sites containing elements that could affect the SRN, National Highways would expect to be consulted.

Employment Allocations:

There are no specific, large employment sites allocated within the Local Plan. Instead, policy DM7 allocates two existing industrial estates in the borough as Strategic Employment Sites which have the highest level of protection for employment uses. No significant expansion of these sites is proposed, and

they are both over 5 miles from the SRN. National Highways therefore does not have any comment to make regarding proposed employment allocations.

It should nonetheless be ensured that any application for significant amounts of new employment floorspace, whether on new sites or expansions to existing sites, includes a comprehensive assessment of the impact of the proposals on the road network and where close to a SRN junction, includes full turning movements. Junction capacity assessments may be required for proposals which place a larger number of development trips through SRN junctions. This is particularly likely to be the case for any large new employment sites which may come forward in the south of the borough, outside of existing employment areas.

Transport Evidence Base & Infrastructure Delivery Plan:

A Strategic Highways Modelling Report dated October 2024 is included within the Regulation 19 consultation. This work forms a key piece of evidence to demonstrate that the Local Plan is sound, therefore it is important that any identified mitigation which the plan or its allocations are reliant upon has a reasonable prospect of delivery within the timescales of when the identified growth is planned. As noted above, National Highways have already had discussions with Epsom & Ewell Borough Council about this report and we will continue to liaise with the Council to resolve our outstanding requests for information.

Having reviewed the updated Infrastructure Delivery Plan (IDP) dated November 2024, there are no significant transport schemes proposed which will have a significant impact on the SRN. Should this change due to any further work undertaken on the Strategic Highways Modelling Report, we would expect that an updated IDP would be prepared.

Statement of Common Ground

We are still liaising with the Council and have requested further information that we will review alongside the supporting transport evidence base going forwards. It will be essential for National Highways and the Council to agree a statement of common ground following our review of the modelling, setting out any potential concerns and agreed next steps in advance of an Examination in Public. I look forward to receiving a draft SOCG in due course.

We look forward to continuing our constructive engagement.

If you have any questions with regards to the comments made in this response, please do not hesitate to contact us via PlanningSE@nationalhighways.co.uk.

Regards,



Contents

Appendix 2 SCG09 Historic England EEBC SoCG May 25 redacted..... 2

Appendix 2 SCG10 Environment Agency EEBC SoCG signed May 25..... 7

Appendix 2 SCG11 NHSPS EEBC SoCG signed May 25..... 15

Statement of Common Ground

This Statement of Common Ground (SoCG) is between Epsom & Ewell Borough Council (EEBC) and Historic England (HE) in relation to the Epsom & Ewell Local Plan 2040.

1) Constituent parties to this SOCG

Epsom & Ewell Borough Council (EEBC)
Historic England (HE)

2) Background

This SOCG sets out the agreed position as of May 2025 in relation to EEBC's Submission Local Plan. Historic England (HE) are the governments advisor on the historic environment and seek to ensure that the protection of the historic environment is fully taken into account at all stages of the plan making process.

HE has been engaged at key stages throughout EEBC's Local Plan process, the details of which are provided below.

Regulation 18 Draft Local Plan

HE responded to the Regulation 18 Draft Local Plan consultation (February to March 2023), which was supported by an Interim Sustainability Appraisal. The response focused on the draft heritage policies within the Local Plan and the consideration of heritage in the selection of sites. A summary of the representation is detailed below:

- 1) Site selection not appropriately informed by a robust understanding of the historic environment of the Borough, in accordance steps associated with Historic Advice Note 3.
- 2) Request to reference Historic Advice Note 12 when referring to Heritage Statements (Policy S13/S2)
- 3) Policy on Heritage Assets (DM8) should ensure full compliance with the NPPF. It should also address heritage at risk.
- 4) Definition of Archaeological Potential should be included in glossary.
- 5) Plan supported by limited evidence for the historic environment. E.g. no heritage specific documents have been produced. Evidence should be published as per para 193 of NPPF. A heritage SPD or Heritage conservation strategy can be useful.

Post Regulation 18 Consultation

Following the receipt of the comments on the Regulation 18 Local Plan EEBC and HE have worked together to address the issues raised during the Regulation 18 consultation stages from all respondents.

In February 2024, EEBC sent draft revised Local Plan policies to Historic England and Surrey County Councils Historic Environment Planning Team. Comments on the draft policies were received from Historic England.

In September 2024, EEBC sent the final heritage policies and draft Topic Paper / Strategy to HE for comment. A response was received in October 2024 stating that the approach EEBC are taking is consistent with the NPPF and would likely, therefore, to be judged to be sound when assessed at EIP.

Regulation 19 Proposed Submission Local Plan

The Council consulted HE on the Regulation 19 Local Plan on 20 December 2024 and a response was received on the 3 February 2025 stating that HE's comments on the Regulation 18 stage draft Local Plan have largely been addressed in the current Publication version of the Local Plan or are, in their view, not now likely to affect the soundness of the Local Plan.

A copy of HE's Regulation 19 response is provided in Appendix 1.

3) Positions of the parties

Both parties agree:

- The Local Plan 2022-2040 sets out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats, in accordance with para 196 of the NPPF.
- The Local Plan process has fully considered matters of the historic environment, evidenced by:
 - a) An audit and evaluation of heritage through the heritage topic paper;
 - b) The inclusion of the historic environment as a key element of the vision and strategic objectives of the Local Plan;
 - c) Heritage Impact Assessment of all site allocations in the plans;
 - d) The Consideration of Conservation Areas and Listed Buildings in the Site Selection Methodology.
 - e) The development of policies in collaboration with Historic England and Surrey County Council.

4) Signatories

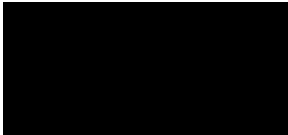
Epsom & Ewell Borough Council:



Councillor Peter O'Donovan - Chair of Licencing and Planning Policy Committee

Date: 14/05/2025

Historic England:



Alan Byrne - Historic Environment Planning Advisor

Date: 13/05/2025

Appendix 1: Historic England Regulation 19 Representation



Planning Policy
Epsom and Ewell Borough Council
Town Hall, The Parade
Epsom
Surrey, KT18 5BY

Our ref: PL00039550

Your ref:

Telephone
Email



By email only to localplan@epsom-ewell.gov.uk

Date 3 February 2025

Dear Sir or Madam

Epsom and Ewell Local Plan 2022-2040 Regulation 19 Consultation

Thank you for your email of 20 December 2024 inviting comments on the above consultation document.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.

There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. In our previous comments (by letter dated 16 March 2023), Historic England focused on the objective of the National Planning Policy Framework to set out a positive strategy for the conservation and enjoyment of the historic environment (Paragraph 196, NPPF); and contain policies to sustain and enhance the significance of the heritage assets (Paragraph 196 a, NPPF).

Our comments on the Regulation 18 stage draft Local Plan largely have been addressed in the current Publication version or are, in our view, not now likely to affect the soundness of the Local Plan.

We welcome the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the NPPF. We note also the significant progress that has been made on preparing a proportionate evidence base for the local plan heritage policies in the form of a draft heritage topic paper. The key test of the soundness of the plan and the achievement of sustainable development as defined in the



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Drogan Hill, London EC4A 3DF.
Telephone 020 7973 3700 historicengland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send to us may therefore become publicly available.





NPPF in respect of the elements that relate to the historic environment (paragraph 196), in our view, have been met.

We should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. We hope that these comments are useful.

Yours sincerely

Alan Byrne
Historic Environment Planning Adviser



Historic England, 4th Floor, The Mirror, Cannon Bridge House, 25 Doughty Hill, London EC4R 2JA
Telephone: 020 7675 1100 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



Statement of Common Ground

This Statement of Common Ground (SoCG) is Between Epsom and Ewell Borough Council (EEBC) and The Environment Agency in relation to the Epsom and Ewell Local Plan 2022-2040

1) Constituent parties to this SOCG

Epsom & Ewell Borough Council (EEBC)
The Environment Agency

2) Background

This Statement of Common Ground (SOCG) sets out the agreed position as of May 2025 in relation to EEBC's Submission Local Plan. The Environment Agency (EA) is a non-departmental public body as established under the Environment Act 1995, whose purpose is to protect or enhance the environment, taken as a whole, in the interest of contributing to sustainable development. This encompasses a broad and interconnected range of responsibilities, including the regulation and oversight of environmental quality, the conservation and management of natural resources, and the protection of people and property from environmental hazards such as flooding and pollution.

The Agency's statutory remit covers the regulation of water resources, waste management, and pollution control across air, land, and water. It is empowered to issue permits, set environmental standards, monitor compliance, and enforce the law where necessary to prevent harm to the environment or human health. The Agency also plays a vital role in flood risk management, providing strategic planning and operational response to both fluvial and coastal flooding.

Moreover, the Environment Agency has a duty to contribute to the achievement of sustainable development, meaning it must balance environmental, social, and economic considerations in its decision-making processes. This includes promoting resource efficiency, enhancing biodiversity, and ensuring that environmental considerations are integrated into broader planning and infrastructure decisions. Its statutory functions also involve working collaboratively with local authorities, businesses, other governmental bodies, and the public to promote environmental stewardship and resilience in the face of challenges such as climate change.

The EA has been engaged at key stages throughout Epsom and Ewell Borough Council's (EEBC) Local Plan process, the details of which are provided below.

Regulation 18 Consultation

EA responded to the Regulation 18 Draft Local Plan consultation (February to March 2023), which was supported by an Interim Sustainability Appraisal. The organisation made suggestions about terminology and how some of the policies and strategic objectives should be worded regarding flood risk and biodiversity. In some cases, it required specific policy requirements to be added (such as requiring developments to be set back a minimum of 8 metres from riverbanks and existing flood defence infrastructure). It also drew an important link between the dual purposes of some policy requirements in ensuring compliance under other statutory requirements (e.g. as well as mitigating flood risk, set-backs are a measure in BNG Metrics).

Post Regulation 18 Consultation

Following the receipt of the comments on the Regulation 18 Local Plan EEBC and the EA have worked together demonstrated by the timeline below:

- September 2023: the EA met with EEBC to discuss updating the Strategic Flood Risk Assessment (SFRA) and the EA agreed to share data and input on the specification EEBC would write for the project.
- September 2023: the specification of the SFRA was shared with the EA and the EA provided comments.
- February 2024 – the EA attended an SFRA inception meeting with other stakeholders.
- June 2024 - the EA provided comments on the draft Level 1 SFRA, suggesting some minor amendments, which model should be used for flood zone 3b as well and some deeper definitions.
- August 2024 - EEBC provided a draft revised flood policy for the EA review.
- September 2024 - The EA responded stating that they were broadly satisfied with the policy, and the updated SFRA.
- September – November 2024 – EA responded to EEBC questions relating to amendments flood zones and what was meant by defended and undefended extent.

Regulation 19 Consultation

The EA were consulted on the Regulation 19 Local Plan on 20 December 2024 and a response was received on the 4 February 2025 stating that the EA consider the Local Plan to have been informed by sound environmental evidence base and produced in line with the Duty to co-operate and that they do not consider the policies within the plan to be unsound.

The EA have made recommendations and provided advice regarding the proposed policies, which could strengthen them and maximise their effectiveness but these are not intended to correct issues of legal compliance or soundness.

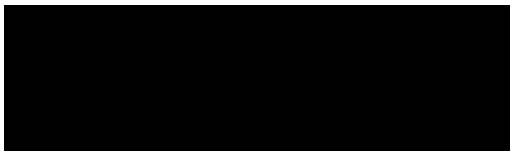
A copy of EA's Regulation 19 response is provided in Appendix 1

3) Positions of the parties

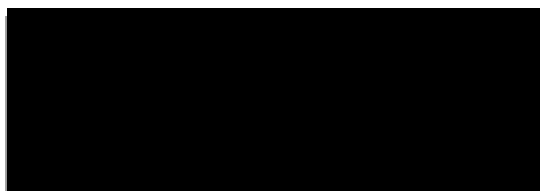
Both parties agree

- They have worked constructively to address the issue of flood risk, biodiversity and pollution in the Local Plan.
- The Local Plan process has fully considered matters of the environment, informed by comprehensive and up to date evidence base, including SFRA (Level 1 and 2), Sequential Tests, Sustainability Appraisal and Site Selection Methodology.
- The development of policies in collaboration with the Environment Agency and Surrey County Council.
- EA have no outstanding concerns in relation to the soundness or legal compliance of the Proposed Submission Local Plan.

4) Signatories



Name: **James Togher**
Sustainable Places Team Leader – South London
Environment Agency
Date 15 May 2025



Name: **Councillor Peter O'Donovan**
Chair of Licencing and Planning Policy Committee
Date 16 May 2025

Appendix 1: EA Regulation 19 Representation

creating a better place
for people and wildlife



Epsom & Ewell Borough Council
Planning Policy

Our ref: [REDACTED]

Your ref: Regulation 19 draft Local Plan

Sent via email

Date: 4 February 2025

Epsom & Ewell Regulation 19 draft Local Plan consultation

Thank you for consulting us on your draft local plan (Regulation 19 stage). We received the consultation from you on 20 December 2024.

We welcome the new Epsom and Ewell Local Plan which we believe has been informed by a sound environmental evidence base and produced in line with the Duty to co-operate. We do not consider the policies within the plan to be unsound. However, we have provided recommendations and advice regarding the proposed policies, which could strengthen them and maximise their effectiveness in achieving your sustainable development goals.

We welcome the fact the new site allocations are directed away from the high and medium risk flood zones which is in line with the sequential approach to manage flood risk by steering development to the lowest risk flood areas. We support the new local plan policies to deliver environmental protection and enhancements and adapt to a changing climate.

Please see our comments, advice and further recommendations below.

- Section 1 – Environmental issues and opportunities
- Section 2 – Site allocations
- Section 3 – Sustainability appraisal and Sequential Report

We look forward to working in partnership with you on the preparation of your Local Plan. We hope you find our response helpful. Please do not hesitate to be in touch if you have any queries or questions.

Yours sincerely

Shea Bunyan
South London Sustainable Places
Email [REDACTED]

Section 1 – Key environmental issues and opportunities

This section will cover the following environmental issues and opportunities:

- Flood Risk
- Biodiversity

Flood risk management

We are generally encouraged by the inclusion, and subsequent strengthening, of Epsom and Ewell's policies compared to the Regulation 18 draft Local Plan in protecting the Borough and its residents from the risk of flooding, which, as highlighted within the draft local plan, is likely going to increase due to climate change.

We would like to take this opportunity to comment on and advise adjustments which could be made to strengthen these policies to help further mitigate and adapt development in Epsom and Ewell to the risk of flooding and a changing climate.

The Functional Floodplain (Flood Zone 3b)

Whilst we are pleased to see the update to include mention to Flood Zone 3b (FZ3b) within Policy 16: Flood Risk and Sustainable Drainage, the definition provided within Paragraph 7.66 is contrary to the definition of the functional floodplain provided within Epsom and Ewell's recently published Strategic Flood Risk Assessment (SFRA).

Epsom and Ewell's Level 1 SFRA (2024) defines FZ3b as:

"...land that has an annual probability of flooding from rivers or seas of 1 in 30 years or greater (≥3.3% AEP)"

We strongly recommend that Paragraph 7.66 is updated to reflect the evidence base adopted by Epsom and Ewell's SFRA to echo the national Planning Practice Guidance's recommendation to use the 1 in 30 years or greater (>3.3% AEP) extents to define FZ3b. We support the use of this definition. Without this update, the draft local plan will be contrary to the provided evidence base.

Setback from main rivers

We welcome the inclusion of a minimum of the eight metres of setback of development from both riverbanks and/or flood defence infrastructure within Policy S16: Flood Risk and Sustainable Drainage. We also agree in principle with the provided definition for how to measure setback from a riverbank in Policy S16(d).

Finished floor levels

We welcome the requirement of Policy S16(e) to require all finished floor levels of development to be set 300mm above the climate change flood level. This is in line

with Epsom and Ewell's Strategic Flood Risk Assessment and further helps to ensure all new developments are maximising their flood resistance and resilience measures against the increase of flood risk posed by climate change.

Floodplain storage compensation

We welcome the update to include the requirements for developments proposing an increase in built footprint in fluvial Flood Zone 3a (FZ3a), plus the climate change extents, must compensate on a level for level, volume for volume basis in Policy S16(g).

Mitigation measures

We would strongly recommend that Policy S16(f) is updated to reflect the following wording to ensure that the approach is appropriate and in line with relevant national policy and guidance:

"It would not increase the risk of flooding to the site or elsewhere. Mitigation measures to address such risks should be in line with guidance from both the LLFA and EA depending on the source of flood risk."

Culverted main rivers

We are pleased to see Epsom and Ewell's policy reflects planning guidance to prevent further river culverting, and also to maximise opportunities to deculvert main rivers where applicable, provided there is a demonstration that flood risk will not be increased elsewhere as a result.

Culverts present a detriment to the connectivity of river corridor habitats that are important for biodiversity and should therefore not be permitted, but instead, opened at every opportunity.

Biodiversity

The importance of ecological networks of linked habitat corridors (both within the Epsom & Ewell and the linked adjacent Boroughs) to allow the movement of species between suitable habitats, and to promote the expansion of biodiversity, is defined in the NPPF and the Local Nature Recovery Strategy commitment of the government's 25-year Environment Plan and enacted by the Environment Act 2021.

We are greatly encouraged by your adoption of the term 'green and blue infrastructure' throughout to reflect the importance of the Borough's wetlands and waterways and the multiple benefits they provide for habitat connectivity, ecosystems and people.

This also reflects the equal importance of measuring and delivering Biodiversity Net Gain (BNG) in both the terrestrial and aquatic environment which could be highlighted more within the plan.

River restoration and enhancements

Paragraph 7.50 highlights Epsom and Ewell's recognition of the opportunities to encourage the deliverance of biodiversity enhancements through the development of sites. This is particularly true for sites adjacent or in close proximity to watercourses.

Where possible, developers should be encouraged to explore options to deliver river re-naturalisation or enhancements to watercourses. This will also assist in developers being able to satisfy both the terrestrial and aquatic arms of the BNG metric.

As such, we recommend that the following wording is included in the preamble for Policy S14 – Biodiversity and Geodiversity to reflect the benefits of river restoration:

"Development in proximity to watercourses should explore and maximise opportunities for river restoration and enhancements through the implementation of Water Framework Directive mitigation measures."

River Buffer zone

We welcome the reference to the BNG metric and its penalisation of development in close proximity to watercourses and how it should be considered in parallel to Policy 16.

We would suggest the paragraph should be strengthened to make direct reference to the 10-metre distance at which penalisation occurs within the metric to encourage developers to consider this from the beginning of their plan-making process.

Monitoring BNG in developments

We recommend that more specific indicators are used, to demonstrate improvements made to rivers through Biodiversity Net Gain, for example, by including an indicator for "number of BNG units in the rivers metric delivered".

Section 2 – Site allocations

We have reviewed the proposed site allocations in Chapter 4 – Planning for Places. We are pleased to see that none of the proposed allocated sites for development are to be sited outside Flood Zones 2 & 3.

We note that within the Level 2 SFRA, two sites are located within Flood Zones 2 & 3, namely 'Gibraltar Crescent' and 'Blenheim House, 1 Blenheim Road'. We welcome that these two proposed sites have not been brought forward within the Local Plan. We advise should there be any additional proposed sites allocated through the Local Plan process that would be within Flood Zones 2 and 3 that we would welcome the opportunity to engage and comment on their suitability and offer advice on the best ways to address any potential risk from flooding from the proposal(s).

We would also like to take this opportunity to highlight that the former site allocation, named 'Blenheim House, 1 Blenheim Road', is identified to be located within Flood

Zone 3b, defined as the 'Functional Floodplain' by Table 1 of the PPG. In accordance with Table 2 of the PPG, residential development (which is considered as 'more vulnerable' in terms of flood risk) would be considered incompatible with this flood zone and we strongly recommend it to not be considered for any potential future site allocations.

Section 3 - Sustainability Appraisal & Sequential Report

We are satisfied that the submitted Sustainability Appraisal (Aecom, December 2024) identifies appropriate issues and objectives, and flood risk is considered as an appropriate constraint when assessing alternative growth scenarios.

Flood risk has been identified as a key component of climate change adaptation, which we welcome given the increased risk of flooding brought by climate change. (Section 6.5). We agree that it is difficult to differentiate between the proposed growth scenarios due to the variable site options not being at significant risk of flooding.

The Sequential Report tests all allocated sites in the Regulation 19 Plan in a sequential manner, in line with the "Flood Risk and Coastal Change" section of the Planning Practice Guidance (PPG). All sites are located within Flood Zone 1 for fluvial flooding. It should be noted that the "Exception Test" should only be applied following the application on the "Sequential Test" - the sequential test can either be applied for site allocations, or for specific sites where they are unallocated and meet the requirements for sequential testing outlined in [Paragraph 27](#) of the PPG.

Section 4 - Local Plan monitoring and evidence base

To ensure the new Local Plan policies are delivering environmental protection and enhancement requires ongoing monitoring and evidence base reviews to ensure the policies and land use designations are based on the most up to date evidence and data such as the latest flood mapping, climate changes allowances and environmental infrastructure requirements.

The environmental evidence base and environmental capacity should be regularly assessed to ensure the right environmental infrastructure is in place to support the ongoing delivery of your housing targets. For the latest environmental data sets such as groundwater source protection zones, flood risk zones, main river maps <http://environment.data.gov.uk/ids/partners/index.jsp#/partners/login>

The new Local plan should also be regularly reviewed and informed by the latest catchment planning data and River basin management plans [England's Catchment Data Explorer](#)

Statement of Common Ground

This Statement of Common Ground (SoCG) is between Epsom & Ewell Borough Council (EEBC) and NHS Property Services Ltd (NHSPS) in relation to the Epsom & Ewell Local Plan 2040.

1) Constituent parties to this SOCG

Epsom & Ewell Borough Council (EEBC)
NHS Property Services Ltd (NHSPS)

2) Background

This SOCG sets out the agreed position as of May 2025 in relation to primary healthcare matters and Epsom and Ewell Borough Council's (EEBC) Proposed Submission Local Plan.

NHS Property Services (NHSPS) is a property owner and manager, providing specialist healthcare environments for the delivery of local healthcare services by other parties. NHSPS manages, maintains and improves NHS properties working in partnership with NHS Integrated Care Board organisations.

3) Local Plan engagement and outcomes

EEBC has engaged with NHSPS during the preparation of the Local Plan.

Regulation 18 Draft Local Plan

NHSPS responded to the Regulation 18 consultation on the 17th March 2023. A copy of the full response can be provided by EEBC upon request. The main areas of comment are summarised below:

Issues raised for consideration

Site allocations: SA2 (Town Hall, Hope Lodge and Epsom Clinic) and SA5 (Land at West Park Hospital). NHSPS was supportive of Site Allocation SA2, however, emphasised the suitability of Epsom Clinic Site to be an individual site allocation. NHSPS provided constructive comments on Site Allocation SA5 to include the New Epsom and Ewell Community Hospital Site.

Healthy design: NHS Property Services suggest that the policy be amended to include healthy design aspects. They provide context to the connection between planning and health and the important role the planning system has in creating healthy communities.

Matters in dispute

Policy wording: S16 (Infrastructure Delivery) and DM20 (Community and Cultural Facilities). NHSPS was supportive of the aim of these policies but objected to the specific wording. NHSPS provided alternative wording to ensure that where NHS facilities were no longer needed nor viable, NHS estate reorganisation programmes would be sufficient evidence for the local authority to support an alternative use of the site.

Regulation 19 Proposed Submission Local Plan

The Regulation 19 Proposed Submission Local Plan consultation was undertaken from 20 December 2024 to 5 February 2025. NHSPS provided a response dated 5th February 2025, the key points which are set out below. A copy of the full response is provided in Appendix 1.

Matters in agreement

Site Allocations SA32 (land at West Park Hospital (North) and SA8 (Epsom Clinic) – Support given to Site Allocation SA32 for the inclusion of the New Epsom and Ewell Community Hospital Site within the allocation. Support given to Site Allocation SA8 for allocating the Epsom Clinic Site separately to the Town Hall and Hope Lodge Sites.

Policy DM12: Health Impact Assessments – NHSPS Supports the policy, highlighting the Council's commitment to ensuring that new developments promote healthier lifestyles through use of HIAs.

Policy S17: Infrastructure Delivery – Support the overall approach to infrastructure delivery and provide context that NHS and partners will need to work with Council to formulate mitigation measures re: health provision.

Infrastructure Delivery Plan - Supports EEBC's efforts to work with NHS Surrey Heartlands Integrated Care Board.

Issues raised for consideration

Policy S6: Affordable Housing – Include a requirement specifically for NHS staff or care provider staff.

Matters in dispute

Policy DM20: Community and Cultural Facilities – Consider policy is not positively prepared because policy does not state that loss of community facility will be allowed where it is part of a wider public service estate reorganisation. Alternative wording proposed.

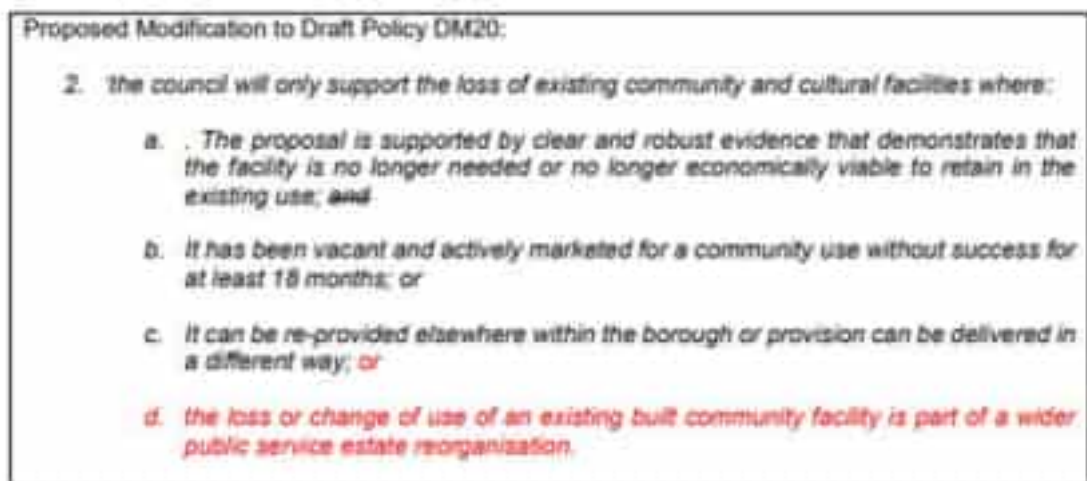
4) Positions of the parties

Both parties agree:

- EEBC and NHSPS have worked constructively to identify and allocate NHS owned land which is surplus to requirements.
- The NHSPS are broadly supportive of the policies within the Proposed Submission Local Plan.

Areas where the parties have not reached agreement:

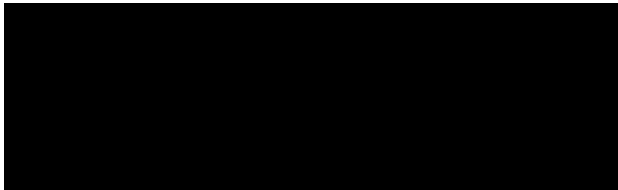
- NHSPS are seeking a modification to the wording of policy DM20: Community and Cultural Facilities as set out below (proposed modification **in red**), to ensure the policy approach is 'positively prepared and effective'. This is to ensure flexibility with regards to the NHS estate to align with any changes to the estate strategy for the area:



- EEBC consider that Policy DM20 as written in the Proposed Submission Local Plan provides adequate flexibility, as shown where it can be justified through clear and robust evidence. The Council has not included these suggested changes in the [Schedule of Proposed Modifications](#) (Examination Library Document SD13).

5) Signatories

Epsom & Ewell Borough Council:

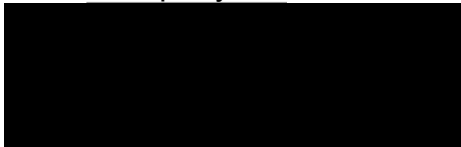


Councillor Peter O'Donovan

Chair of Licencing and Planning Policy Committee

Date: 16/05/25

NHS Property Services Ltd



Marc Hoenen

Date: 15/05/25

Appendix 1: NHS Property Services Ltd Regulation 19 Proposed Submission Local Plan Consultation Response



Epsom and Ewell Council
Planning Policy
The Old Town Hall
The Parade
Epsom KT18 5BY

NHS Property Services Ltd
10 South Colonnade
Canary Wharf
London E14 4PU

06/02/2025

BY EMAIL ONLY

RE: Consultation on Epsom and Ewell Proposed Submission Local Plan 2022-2040

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS).

NHS Property Services

NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.

General Comments on Health Infrastructure to Support Housing Growth

The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.

Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Detailed Comments on Draft Local Plan Policies

Our detailed comments set out below are focused on ensuring that the needs of the health service are embedded into the Local Plan in a way that supports sustainable growth. When developing any additional guidance to support implementation of Local Plan policies relevant to health, for example in relation to developer contributions or health impact assessments, we would request the Council engage the NHS in the process as early as possible.

Draft Policy S6 Affordable Housing

As part of preparing additional guidance to inform detailed delivery of this policy, we suggest the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable commuting proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.

Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:

- Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners.
- Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies).
- Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.

Draft Policy DM12 Health Impact Assessments

Draft Policy DM12 sets out the Council's commitment to making sure that new major developments promote healthier lifestyles and improve overall health and wellbeing through the use of HIAs. NHSPS welcomes and supports the inclusion of policies that support healthy lifestyles, and the requirement for Health Impact Assessment on significant residential developments of 100 units or more or schemes providing 50 or more G2 bedspaces. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.

Draft Policy S17: Infrastructure Delivery

Draft Policy S17 states that all new development must contribute towards the provision (and where appropriate, maintenance) of infrastructure and services. This includes provision to mitigate against

any substantial cumulative effects on existing infrastructure services. The infrastructure necessary to support new development should either be provided on site as an integral part of the development or be secured off-site through financial contributions via the infrastructure levy.

NHSPS supports the overall approach to infrastructure delivery set out with Strategic Policy S17 and welcomes that the delivery of health infrastructure could be supported through S106 or other appropriate agreements as well as Community Infrastructure Levy (CIL).

Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new developments create a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be clarified that the NHS and its partners will need to work with the council in the formulation of appropriate mitigation measures.

Draft Policy DM20 Community and Cultural Facilities

Draft Policy DM20 focuses on the development and protection of Community Facilities which includes GPs, health centres and dentists. NHSPS supports the provision of sufficient, quality community facilities but does not consider the proposed policy approach to be positively prepared or effective in its current form. Where healthcare facilities are included within the Local's Plan definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community.

The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area. Requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facility provision adds unjustified delay to vital reinvestment in facilities and services for the community.

All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services.

Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land or submission of onerous information. To ensure the Plan is positively prepared and effective, NHSPS are seeking the following modification (*shown in red italics*) to Draft Policy DM20.

Proposed Modification to Draft Policy DM20:

2. the council will only support the loss of existing community and cultural facilities where:
- a. The proposal is supported by clear and robust evidence that demonstrates that the facility is no longer needed or no longer economically viable to retain in the existing use; and
 - b. It has been vacant and actively marketed for a community use without success for at least 18 months; or
 - c. It can be re-provided elsewhere within the borough or provision can be delivered in a different way; or
 - d. the loss or change of use of an existing built community facility is part of a wider public service estate reorganisation.

Site Allocations

NHSPS's Property Strategy team has been supporting Clinical Commissioning Groups and Sustainability and Transformation Plan groups to look at ways of better using the local health and public estate. This includes identifying opportunities to reconfigure the estate to better meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites emerging from the site promotion process.

Site Allocation SA32

Site Allocation SA32 – Land at West Park Hospital (North) is currently allocated for residential development of approximately 150 dwellings. NHSPS notes and supports the inclusion of the New Epsom and Ewell Community Hospital (NEECH) as part of this site allocation

Site Allocation SA8

Site Allocation SA8 – Epsom Clinic is currently allocated for residential development of approximately 30 dwellings. NHSPS supports this allocation.

Evidence Base Infrastructure Delivery Plan

The provision of adequate healthcare infrastructure is in our view critical to the delivery of sustainable development. A sound IDP must include sufficient detail to provide clarity around the healthcare infrastructure required to the level of growth proposed by the Plan, and to ensure that both planning obligations and the capital allocation process for the Community Infrastructure Levy (CIL) effectively support and result in capital funding towards delivery of the required infrastructure.

NHSPS supports the Council's efforts to work with Surrey heartlands ICB to ensure that the assessment of existing healthcare infrastructure is robust, and the mitigation options secured align with NHS requirements. We note and support the inclusion of primary healthcare provision as a part of the strategic allocation SA35 – Land at Horton Farm. NHSPS welcomes the inclusion of three sites recommended by the ICB (Old Cottage Hospital, Shadbolt Park house and Bourne Hall Health Centre) to provide additional capacity over the plan period.

Conclusion

NHSPS thank Epsom and Ewell Borough Council for the opportunity to comment on the Epsom and Ewell Local Plan 2022-2040. We trust our comments will be taken into consideration, and we look forward to reviewing future iterations of the Plan. Should you have any queries or require any further information, please do not hesitate to contact me.

NHSPS would be grateful to be kept informed of the progression of the Local Plan and any future consultations via our dedicated email address [REDACTED]

Yours faithfully,

Daniel Fleet
Town Planner

[REDACTED]

For and on behalf of NHS Property Services Ltd



Appendix 3: SoCG emails

SoCG: Gatwick Airport

From: [REDACTED]
Sent: 12 July 2024 14:09
To: [REDACTED]
Subject: [WARNING EXTERNAL] Re: Epsom & Ewell Borough Council – emerging Local Plan & GAL Reg 18 response follow up

Good Afternoon [REDACTED]
Thank you for your email, I hope all is well with you.

We are hoping that the consultation maps showing the extended consultation area, out to 55km from the Aerodrome Reference Point (ARP) will be ready for distribution to the LPA's around the end of this month/beginning of August. Apologies for the delay in issuing the maps but there was a delay at CAA.

With regard to consultations and the CAA. CAA devolved the responsibility for aerodrome safeguarding to the individual airports back in 2003. They will only get involved in the assessment of developments if for example the airport wished to object to an application and the LPA wished to approve it, they would mediate. We have been trying for some time to get the 'Aerodrome Operators' listed on the relevant planning documents as a statutory consultee as it does cause some confusion. So as far as aerodrome safeguarding is concerned as long as you consult the relevant airport(s) then your duty will be met.

I hope this helps, if you have any other queries please do not hesitate to contact me. I hope you have a good weekend.

Best Regards [REDACTED]

From: Susie Legg [REDACTED]
Sent: Thursday, Jul [REDACTED]

Subject: [EXTERNAL SENDER] Epsom & Ewell Borough Council – emerging Local Plan & GAL Reg 18 response follow up

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Dear [REDACTED]

Epsom & Ewell Borough Council – emerging Local Plan & GAL Reg 18 response

I write with reference to the above and the response we received to the Regulation 18 consultation from yourselves (attached), which I wanted to follow up on.

In your response it was stated that the Borough of Epsom and Ewell sits outside the safeguarding zone for development, which is 15km from the Aerodrome Reference Point (ARP). It was also stated that in the near future (possibly summer 2023) the Gatwick safeguarding zone relating to Instrument Flight Procedures (IFPs) is being extended and will include the Epsom & Ewell Borough area. As such, it was recommended that the Local Plan includes an Aerodrome Safeguarding policy. The borough does already sit within the 30km wind turbine notification area.

I would be grateful if you could provide me with an update on the status of safeguarding zone for development. I have looked on your website and it appears that as yet, no changes have been made. As we are nearing the Regulation 19 stage of the Local Plan, we are looking to finalise which policies should be included, hence my email to you as to whether a safeguarding policy is required.

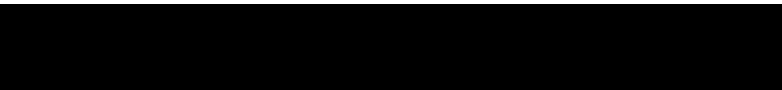
Additionally, the Civil Aviation Authority (CAA) are a body the Council is statutorily required to consult with as part of the Duty to Cooperate under the Localism Act 2011. We have not received a response from the CAA and wonder whether GAL's response would help us meet the Duty requirement in terms of safeguarding.

I would be grateful for your views on the above. Please let me know if you require any further information & I look forward to hearing from you.

Many thanks



Principal Policy Officer
Epsom & Ewell Borough Council



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www.gatwickairport.com



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SoCG: Heathrow Airport

From: [REDACTED]
Sent: 10 January 2025 09:01
To: [REDACTED] DD - Airport Safeguarding/BAA
Subject: [CAUTION EXTERNAL] RE: Epsom & Ewell Regulation 19 Local Plan consultation live

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Classification: Internal

Hi [REDACTED]

Many thanks for letting us know.

We are happy with the policy wording apart from the reference to 30km. The revised coloured square maps for safeguarding go out to 55km (as you acknowledge) so maybe the policy should mention that distance and not the 30km which relates to the Wind Turbine Circle.

Regards,
[REDACTED]

[REDACTED]
[REDACTED] sending

Heathrow

Web: heathrow.com App: heathrow.com/apps
Social: [Twitter](#) | [Facebook](#) | [Instagram](#) | [YouTube](#) | [TikTok](#)

From: [REDACTED]
Sent: 07 January 2025 13:01
To: DD - Airport Safeguarding/BAA <[REDACTED]>
Subject: Epsom & Ewell Regulation 19 Local Plan consultation live
Importance: High

Some people who received this message don't often get email from slegg@epsom-ewell.gov.uk. [Learn why this is important](#)

Caution: external email. Unless you recognise the sender and know the content is safe, do not click links or open attachments.

Dear [REDACTED]

I would like to notify you of the Epsom & Ewell Regulation 19 Proposed Submission Local Plan consultation, which runs from 20 December until 5 February 2025. The consultation can be accessed via the [new Local Plan](#) webpage.

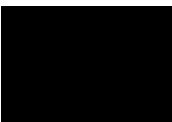
The Proposed Submission Local Plan contains a new policy DM22 on Aerodrome Safeguarding, which I wish to draw your attention to. This reads:

“Development should have regard to aerodrome safeguarding requirements and will only be supported if it is consistent with the continued safe operation of airports.”

The supporting text states “the aerodrome safeguarding area extends to cover a zone broadly within 30km of the airports, covering much of the borough. The borough is also within the 30km wind turbine notification area.” We are aware that the safeguarding area has now been extended to 55km and will be suggesting to the inspector that the wording of the supporting text be amended to reflect this. Gatwick airport have already suggested this modification. Gatwick has also stated that the wind turbine notification area has remained at 30km.

If you need to discuss anything in relation to the Local Plan, then please do not hesitate to contact me.

Kind regards



Principal Policy Officer

Epsom & Ewell Borough Council



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SoCG: Homes England

[REDACTED]

From: [REDACTED]
Sent: 23 July 2024 10:05
To: [REDACTED]
Subject: Epsom & Ewell Borough Council: Local Plan Duty to Cooperate
Categories: Egress Switch: Unprotected

Dear Homes England

As you are aware, Homes England is named in the Local Plan regulations as a Prescribed Body in terms of the Duty to Cooperate (DtC) legal test. Epsom & Ewell is making progress with its Local Plan, and we are now moving towards the Regulation 19 stage, the Proposed Submission Local Plan. Epsom & Ewell consulted on its [Regulation 18 draft Local Plan](#) in February/March 2023 to which we did not receive a response from Homes England. As far as I am aware, the Council has not had any direct involvement with Homes England in the recent past and that Homes England has no active land interests in the borough.

In the interests of the Duty to Cooperate, I wish to provide a further opportunity for Homes England to identify any issues or make any comments, which relate to Epsom & Ewell's Local Plan. The Council will consult Homes England at the Regulation 19 proposed submission stage and will engage with Homes England in the future should any specific issues be identified.

Please let me know if any of the above requires further clarification or would be preferable to discuss via a teams meeting, and I look forward to hearing from you.

Kind regards

[REDACTED]
Principal Policy Officer
Epsom & Ewell Borough Council

[REDACTED]

SoCG: Office for Road and Rail

From: [REDACTED]
Sent: 17 July 2024 12:22
To: [REDACTED]
Subject: Epsom & Ewell Borough Council: Local Plan Duty to Cooperate
Categories: Egress Switch: Unprotected

Dear ORR

As you are aware, The Office for Road and Rail is named in the Local Plan regulations as a Prescribed Body in terms of the Duty to Cooperate (DtC) legal test. Epsom & Ewell is making progress with its Local Plan, and we are now moving towards the Regulation 19 stage, the Proposed Submission Local Plan. Epsom & Ewell consulted on its [Regulation 18 draft Local Plan](#) in February/March 2023 to which we did not receive a response from the ORR.

In the interests of the Duty to Cooperate, I wish to provide a further opportunity for the ORR to identify any issues or make any comments, which relate to Epsom & Ewell's Local Plan. I have read your guidance on 'Delivering ORR's duty to cooperate', and understand the need to highlight which parts of the plan concern transport matters due to the volume of requests and the length of plans you receive.

To provide some context. The borough of Epsom & Ewell is served by four stations: Epsom (within the main town centre of the borough), Ewell East, Ewell West and Stoneleigh, with direct lines into London Victoria and Waterloo, and out into Surrey. A context map of the position of Epsom & Ewell in the rail network can be seen on page 11 of the [Regulation 18 draft Local Plan](#). Given the well-connected nature of the borough and its position adjoining greater London authorities, the draft plan seeks to maximise sustainable transport opportunities. A strategic transport policy, S18 and its supporting text on page 270 of the draft Local Plan sets out the Council's transport aims and requirements. Additionally, the Council regularly engages with its infrastructure providers to inform its Infrastructure Delivery Plan to ensure that infrastructure provision supports new development. Network Rail are one of our consultees and a part Community Infrastructure Levy (CIL) funded 'Access for All' scheme at Stoneleigh station is now nearing completion.

The Council will consult the ORR at the Regulation 19 proposed submission stage (anticipated to be in early 2025) and will engage with the ORR in the future should any specific issues be identified. I would be grateful if you could highlight whether there is anything further the Council should do in terms of discharging the Duty to Cooperate with yourselves or if you are satisfied with the engagement undertaken.

Please let me know if any of the above requires further clarification or if would be preferable to discuss via a teams meeting.

I look forward to hearing from you.

Kind regards

[REDACTED]
Principal Policy Officer
Epsom & Ewell Borough Council

Appendix 4: DtC Timeline of meetings and minutes

Activities and meetings are in date order. Regular, reoccurring meetings, which include Surrey Planning Working Group, Surrey County Council/EEBC Joint Prioritisation Meeting and the Surrey Health and Planning Forum are highlighted for clarity.

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
17/02/22	Developers, landowners & relevant stakeholders. DtC partners contacted included: Surrey County Council NHS (Property Services) National Trust Thames Water The Jockey Club	Call for Sites Email sent to stakeholders to advise that the Council had commenced a call for sites exercise.	n/a	Submissions used to inform the Land Availability Assessment (LAA)	
23/05/22 to 29/06/22	Environment Agency, Natural England, Historic England, London Borough of Sutton, Elmbridge Borough Council, London Borough of Kingston Upon Thames; Mole Valley District Council, Reigate and Banstead District Council	SA Scoping Report Consultation Opportunity to comment on the SA Scoping Report , in particular the evidence base for the SA, the identified key issues, and the proposed SA framework of objectives and appraisal questions.	None	Comments received reviewed and have influenced the development of the SA where appropriate.	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
24/05/22	SCC officers, Surrey Planning Policy Managers (or substitutes), external guest speakers	Surrey Planning Working Group Ecology updates: UK Habitat mapping and Biodiversity Opportunity Areas Sustainability Working Group Co-Plug Project (healthcare planning model) update Standing Items: Health and Planning Group; Heathrow / Gatwick Airports, Minerals and Waste Local Plan) Local Plan updates	n/a	Land App produced a UK habitat classification map of Surrey, Discussion around developing common evidence base for sustainability matters across Surrey. Update on Co-plug project for the implementation of the healthcare modelling tool. Updated provided on the Epsom and Ewell Local Plan, notably the publication of a new LDS in April 2022 and progressing to Regulation 18 stage in November 2022.	
25/05/22 to 17/06/22	DtC partners including: Neighbouring LPAs	Consultation on draft DtC Framework Draft framework identifies strategic cross boundary	None	14 responses received. Framework amended. Refer to Consultation Response Summary in	DtC Framework: Consultation draft

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
		<p>issues and seeks input from consultees as to whether: All relevant strategic issues that require cooperation have been identified.</p> <p>The specific issues identified for the individual DtC partners are relevant.</p> <p>Any wider comments on the document.</p> <p>Tailored email sent to DtC partners.</p>		appendix 6 for amendments.	<p>Table of issues</p> <p>Consultation email example</p> <p>Consultation response summary</p> <p>Consultation responses</p> <p>Documents available in appendix 6</p>
09/06/22	Surrey authorities, Sutton, Kingston, SCC, EA, Historic England, Homes England	<p>Consultation on LAA methodology</p> <p>Draft LAA methodology was circulated with request to raise any issues or concerns</p>	None	3 Responses received which informed. No significant changes made as a result.	
16/06/22	Capital to Coast Local Enterprise Partnership (Managing Director and Senior Consultant)	<p>Economic Development</p> <p>Discussed the pressure on employment land in the wider LEP area for alternate uses (such as housing).</p> <p>Discussed how at the Local Level, there was some pressure in Epsom and Ewell to redevelop 2 established employment sites.</p>	None	Council agreed to commission the LEP to produce a report on the Economic Value of Longmead and Kiln Lane Industrial Estates.	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
		Discussion the need to determine the economic value of Longmead and Kiln Lane Industrial Estates			
06/07/22	SCC officers, Surrey Planning Policy Managers (or substitutes), external guest speakers	<p>Surrey Planning Working Group</p> <p>SCC- School Organisation Plan</p> <p>SCC - Transport Policy Update</p> <p>SCC Healthy Streets Design Code Update</p> <p>Standing Items: Health and Planning Group; Heathrow / Gatwick Airports, Capital to Coast LEP update Minerals and Waste Local Plan)</p>	n/a	<p>To be published shortly. Shows declining primary numbers.</p> <p>LCWIPs and liveable neighbourhood programmes being progressed. LTP4 to be considered by full council in July.</p> <p>Design Code developing and draft to be circulated shortly.</p> <p>LDS for Surrey Minerals and Waste Plan updated, preferred options to commence Summer 2023.</p>	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
		Local Plan updates		Updated provided on the Epsom and Ewell Local Plan, notably the publication of a new LDS in April 2022 and progressing to Regulation 18 stage in November 2022.	
21/09/22	SCC officers, Surrey Planning Policy Managers (or substitutes), external guest speakers	Surrey Planning Working Group SCC Climate Change Adaptation Strategy SCC – Local Plan Transport Assessments	n/a	Adaptation strategy will evolve over the next 5 years, with the first strategy due early 2023 and a draft at end of 2022 Informed updated County Model is a completely new tool which has now replaced the previous version. Advised that the DFT update to Circular 02/2013 is a significant one, which sets out how National Highways	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
		<p>Surrey Hills Boundary Review</p> <p>Local Plans update</p>		<p>engage in the plan making process and may lead to more frequent transport assessments</p> <p>Informed twelve-week consultation anticipated in Spring next year.</p> <p>EEBC updated may be some slippage to Local Plan timetable and amendments to the LDS in due course.</p>	
07/11/22	<p>EEBC Planning Policy Manager & Planning Officer</p> <p>Council's consultants</p> <p>GL Hearn representatives</p> <p>Developers / agents / housebuilders</p> <p>Reigate & Banstead Planning Policy Manager</p>	<p>HEDNA: Housing needs workshop</p> <p>GL Hearn (consultants) brief on initial findings re. housing need. Topic areas discussed included:</p> <p>Local housing need figure (576dph); affordable housing need, private rented sector, housing need for specific groups (older & disabled persons, wheelchair user households, self-build &</p>	None	To inform the HEDNA	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
	Royal Borough of Kingston upon Thames Planning Policy Officer Surrey County Council (Adult Social Care) University of Creative Arts Transform Housing (A Levy)	custom housing, students, households threatened by homelessness.			
08/11/22	EEBC Planning Policy Manager & Planning Officer Council's consultants GL Hearn representatives Local business organisations and neighbouring authorities	HEDNA: Economic Development workshop GL Hearn (consultants) brief on initial findings re. economic development. Topics discussed included the economy & labour market, employment forecasts, employment land requirements.	None	To inform the HEDNA	
18/11/22	Letters sent to neighbouring authorities, wider Surrey authorities and those authorities just beyond the metropolitan green belt.	DtC engagement on housing and traveller accommodation needs Following the initial findings of the LAA, a formal letter sent to partners requesting assistance in meeting housing and traveller needs.		11 responses received. No authorities in a position to assist.	Responses received available in appendix 5.

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
25/11/22	SCC officers, Surrey Planning Policy Managers (or substitutes), external guest speakers	Surrey Planning Working Group SCC - Adult Social Care Commissions Statements SCC – Green and Blue Infrastructure Guide Co-Plug (healthcare needs modelling) update Local Plans update	n/a	Send C2 planning applications SCC. 121 engagement to be arranged. Guide published as best practise - does not supersede local plan policies. Update provided including how modelling can be used to informed IDPs. EEBC updated on the recent letter sent to Surrey (and wider) authorities requesting assistance in meeting housing and traveller needs.	
06/12/22	EEBC Planning Policy Manager & Planning Officer	HEDNA: Older People & Care Home Provision meeting. Discussing County's	n/a	To inform the HEDNA	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
	Council's consultants GL Hearn representatives Surrey County Council (Adult social care)	approach to understanding the need for older persons accommodation (the 'Commissioning Statement').			
01/02/23 to 19/03/23	Statutory consultees and organisations/individuals on the Council's Local Plan consultation database.	Formal Consultation Stage Regulation 18 Draft Local Plan consultation	n/a	Numerous responses received. Summary of responses is contained in the Consultation Statement (part 1) Ref SD09b	
06/02/23	SCC officers, Surrey Planning Policy Managers (or substitutes), external guest speakers	Surrey Planning Working Group NPPF planning reforms and local plan updates	n/a	All LPAs updated on plan progress. EEBC updated that Reg 18 consultation commenced on 1 Feb and closes on 19 March Elmbridge to submit summer 2023 Mole Valley – Examination hearings ended October 2022 – Councillors have written to government	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
		<p>Feedback on GBC and MVDC BNG and climate change policies (requiring 20% BNG as opposed to 10%)</p> <p>Standing Items: Health and Planning Group; Heathrow / Gatwick Airports, Minerals and Waste Local Plan)</p>		<p>requesting GB sites removed. Reigate and Banstead – new plan preparation work to commence in 2023.</p> <p>Surrey Nature Partnership report helps to reinforce that biodiversity is threatened and increased delivery is worth achieving.</p> <p>Gatwick – the DCO application for a second (northern) runway to be made after Easter 2023.</p>	
28/03/23	SCC officers, Surrey Planning Policy Managers (or substitutes), external guest speakers	<p>Surrey Planning Working Group</p> <p>SCC -Liveable Neighbourhoods Programme</p>	n/a	<p>Noted that expansion of the specialist education</p>	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
		<p>SCC - SEND and AP Capital Programme 2023-2026 Update</p> <p>Surrey Hills AONB Boundary Review</p> <p>Standing Items: Health and Planning Group; Heathrow / Gatwick Airports, Minerals and Waste Local Plan)</p> <p>Local Plan Updates</p>		<p>estate is essential to meet needs.</p> <p>Consultation 07/03/23 to 13/06/23 June 2023. GIS layers supplied to LPAs showing proposed changes.</p> <p>Gatwick – DCO submission likely to be summer 2023.</p> <p>Minerals and Waste - preferred options consultation due to begin in summer 2024.</p> <p>Guildford adopted Part 2 Plan in March Spelthorne – Examination to commence 23 May 2023. EEBC updated plan on hold following full</p>	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
				council decision to pause.	
06/06/23	SCC officers, Surrey Planning Policy Managers (or substitutes), external guest speakers	Surrey Planning Working Group Update on the SCC Climate Change Work Programme. Update on the Co-Plug project (Health needs forecasting); Discussion on Government Consultations Standing Items: Health and Planning Group; Heathrow / Gatwick Airports, Minerals and Waste Local Plan) Local Plan updates	n/a	Knowledge of emerging SCC Climate change evidence base that could be used to support Local Plans policy requirements for low and zero carbon development. Informed of new health needs modelling tool (Co-Plug) and its use in forecasting healthcare needs resulting from development contained in Local Plans and planning applications. Outputs can inform Infrastructure Delivery Plans Updated provided on the Epsom and Ewell Local Plan, notably the	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
				plan remaining on pause.	
18/07/23	Surrey County Council Climate Change Officer EEBC Policy Manager and Environment and Sustainability Officer	Emerging Climate Change Work commissioned by SCC, the anticipated outcomes and timescales of the work to determine whether they are compatible with the EEBC Local Plan time	n/a	Timescales for the project compatible with local plan programme Outcomes will be useful evidence base to support local plan policies on low carbon development.	
12/09/23	Environment Agency and EEBC Principal Planning Officer	Variables affecting whether to update the SFRA inc. changes in guidance, policy and mapping.	n/a	Agreed that due to mapping updates, pertinent to update SFRA. EA Agreed to assist with specification for SFRA.	N/A
12/09/23	SCC officers, Surrey Planning Policy Managers (or substitutes), external guest speakers	Surrey Planning Working Group SCC update on the Biodiversity Net Gain work programme update on the Co-Plug project (Health needs forecasting); Government Consultations	n/a	Knowledge of emerging BNG requirements and how SCC will support LPAs. Data requested to input into Co-Plug model Updated provided on the Epsom and Ewell Local Plan, notably work	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
		<p>Surrey Hills AONB boundary review update (RBC) ;</p> <p>Climate Change and Net Zero Carbon programme update</p> <p>Standing Items: Heathrow / Gatwick Airports, Minerals and Waste Local Plan)</p> <p>Local Plan updates</p>		is being undertaken to unpause the Local Plan which will require a decision by full council.	
14/09/23	Surrey appointed consultants Atkins representatives Surrey County Council Transport Planner EEBC Planning Policy Manager and Principal Planning Officer	<p>LCWIP</p> <p>Inception Meeting for Local Cycling, Walking Infrastructure Plan LCWIP</p> <p>Discussion of the overall approach, programme and data requirements from group. This was followed by fortnightly meetings to discuss progress on the LCWIP</p>	n/a	Continue to meet fortnightly with project team to progress the LCWIP project	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
27/09/23	Sutton (LBS) Strategic Planning Manager, Principal Transport Strategy and policy Officer and Policy Officer EEBC Principal Planners	DTC meeting Meeting arranged by Sutton. Discussed emerging evidence base and potential cross boundary issues DTC meeting	None identified.	Agreed to share information in relation to housing, traveller, employment and retail need. LBS to share tall buildings study.	Minutes available in appendix 8.
02/11/23, 09/11/23, 06/12/23	Stakeholder Workshops with various groups, including EEBC Councillors, neighbouring authorities, external stakeholders (e.g.local walking or cycling group) and EEBC officers.	LCWIP Early engagement on LCWIP, Workshop split into three parts consisting of a presentation setting out the objectives of the LCWIP, discussion about cycle network and then discussion about walking network. This was followed by interactive session using interactive maps to make comments.		Discussed various routes and prioritisation routes and potential high level interventions. Five cycle corridor alignments were refined following comments and three core walking zones were extended to cover nearby schools. Next steps including site visits and discussed	
21/11/23	Surrey County Council (SCC) Planning and Place Making Team representatives EEBC Planning Policy Manager and Principal Planners	Meeting to discuss aspects of SCC's response to the Reg 18 Draft Local Plan. Matters discussed included: Active and sustainable travel across town centre improvements Liveable neighbourhoods		SCC satisfied with the policies on sustainable transport. Should continue to be mindful of LTP4. Densities will depend on the details of the scheme.	Minutes available in appendix 8.

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
		<p>Economic development/town centre vitality</p> <p>Densities on potential allocations</p> <p>Early years education capacity</p> <p>Education place planning forecasts – impact of larger allocations</p> <p>Health and wellbeing</p>		<p>Challenging to forecast for early years due to significant provision being through the private sector.</p> <p>Ian to attend SCC workshop on health and wellbeing.</p>	
23/11/23	<p>SCC officers, Health care providers, Surrey Planning Policy Managers (or substitutes), external guest speakers</p>	<p>Surrey Health and Planning Presentation Day (group will become the Surrey Health and Planning Forum)</p> <p>Embedding health across the planning process: the national and local context</p> <p>SCC Health Impact Assessment Guidance Statement</p> <p>discussions on the opportunities and challenges of implementing Health Impact Assessments</p>	<p>EEBC officers considered that a 'standard' Surrey threshold for a HIA should not be required and this should be at the discretion of the local planning authority to reflect local circumstances</p>	<p>EEBC officers agreed to explore the inclusion of a HIA policy with locally set thresholds in the next iteration of the Local Plan (Proposed Submission)</p>	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
		Best Practice Examples of Health Impact Assessments			
28/11/23	SCC officers, Surrey Planning Policy Managers (or substitutes), external guest speakers	<p>Surrey Planning Working Group</p> <p>SCC - Update of Local Cycling Walking Investment Plans</p> <p>Discussion on calculating needs for Extra Care Housing</p> <p>Discussion on SEND portfolio programme;</p> <p>Discussion on National Planning Changes;</p> <p>Co-Plug Update (Health needs forecasting);</p> <p>Standing Items: - Heathrow / Gatwick Airports, Minerals and Waste Local Plan)</p> <p>Local Plan updates</p>	n/a	<p>Epsom and Ewell LCWIP in the last tranche but work underway</p> <p>Updated provided on the Epsom and Ewell Local Plan, notably the local plan process was un-paused on the 24/10/23 at an extraordinary Council meeting and that a revised Local Development Scheme was approved by the Councils Licensing and Planning Policy Committee on the 22/11/233 with the next key milestone being to undertake Regulation 19</p>	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
				consultation in January / February 2025.	
16/01/24	Various Surrey LPA officers. SCC, NHS Surrey Heartlands CCG	Surrey Health and Planning Forum Feedback from the Surrey Health and Planning Development Day Revised Government Air Quality Strategy Local Street Improvements	n/a		
24/01/24	SCC officers, Surrey Planning Policy Managers (or substitutes), external guest speakers	Surrey Planning Working Group SCC Update on Biodiversity Net Gain SCC Discussion on pupil place forecasting Co-Plug Update (Health needs forecasting); Standing Items: - Heathrow / Gatwick Airports, Minerals and Waste Local Plan)	n/a	EEBC to provide latest data to SCC for the purposes of school place modelling Updated provided on the Epsom and Ewell Local Plan, notably the work progressing in accordance with our approved timetable and DTC meeting will be arranged in due course following updates to evidence base.	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
		AOB (including local plan updates)			
23/02/24	EEBC Planning Policy Officers, Metis (consultants appointed by EEBC); Environment Agency, Surrey County Council, Thames Water, Sutton CC, Applied Resilience (Other boroughs invited but declined)	SFRA Stakeholder Inception Meeting	None	All agreed to support EEBC through the SFRA process. EEBC made aware of some updates to flood risk modelling. Other Borough's in attendance raised no major issues but agreed that to misaligned timelines, not practical to do a joint SFRA with others. SCC as LLFA agreed to provide data Discussion around data requirements and sharing.	
28/02/24	Meeting with Surrey County Council Heritage Officers EEBC Principal Planner and Conservation and Design Officer	Heritage Policies	SCC view that policy needs to be more detailed, akin to existing policy because it is not sufficiently "of Epsom". T	Conclusion of EEBC officers that what made policy "of Epsom" was in reality a list of heritage assets in the borough. Whilst useful, it would not, in EEBC planning officers' view, assist any officer with decision	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
				making <i>about</i> assets. Therefore, held the view that policy should be more concise, and as HE were satisfied on this point, would consider amendments based on factual accuracy. In this meeting EEBC conservation officer also noted a preference for more prescriptive guidance in the policy about what is and isn't acceptable.	
21/03/2024	Surrey Planning Policy Managers and Surrey County Council Officers responsible for School Commissioning	Education Place Planning and Housing Workshop workshop prior to the request for annual housing returns. Education Place Planning to identified the housing data required, how it is used and the accuracy of the figures provided previously	n/a	LPAs to provide accurate forecasts to the team. Local Plan spatial strategy to be appraised using the forecasting model	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
27/03/24 28/03/24 18/04/24	Workshops stakeholder with various groups	Local Cycling Walking Infrastructure Plan Early engagement on LCWIP, what it is and output. Split into two parts. First part was a presentation updating on the progress and presentation on high level interventions. Followed by interactive session where participants provided feedback on potential improvement measures.	n/a	The proposed interventions for both the cycle corridors and CWZs were subsequently refined, following comments.	
10/04/24	Senior SCC officers including the Director of Planning and Environment; EEBC Head of Place Development and EEBC Director of Environment, Housing and Regeneration.	Surrey County Council / EEBC Joint Prioritisation Meeting Surrey Infrastructure Plan (SIP) Update CIL Local Plan	n/a	Updated on key priority projects in EEBC, notably Ewell High Street Improvements scheme; Update on LCWIP and Local Street Improvements programme; EEBC provided update on 2024 CIL funding round that is due to	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
				launch in May for six weeks. Update provided on Local Plan, notably that the plan was being prepared to the published timetable.	
17/04/24	Surrey wide Planning Policy Officers. SCC, NHS Surrey Heartlands CCG	Surrey Health and Planning Forum Presentation and discussion about Joint Strategic Needs Assessment Housing Chapter Presentation SCC's Land Management Policy Presentation and discussion about Health Impact Assessments	n/a		
14/05/24	Royal borough of Kingston upon Thames (RBK) Planning Policy Manager and Planning Policy Officer EEBC Planning Policy Manager and Principal Policy Officer	Key DtC meeting Update on Local Plan position. DtC framework used to guide discussions, which included: housing needs/greenbelt, gypsy & traveller accommodation, flood risk, sustainable transport choices, education and healthcare needs	None	Agreed beneficial to share LAAs and that RBK is not in a position to assist in meeting housing and traveller needs. EEBC to share SFRA Level 1 draft in relation to flood risk and the Strategic Transport Assessment. No significant cross boundary issues	Minutes available in appendix 8.

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
				identified for education and healthcare needs.	
21/05/24	Reigate & Banstead Borough Council (RBBC) Planning Policy Manager EEBC Planning Policy Manager and Principal Policy Officer	Reigate & Banstead Borough Council DtC meeting Update on Local Plan position. DtC framework used to guide discussions, which included: housing needs/greenbelt, gypsy & traveller accommodation, flood risk, sustainable transport choices, education and healthcare needs	None	RBBC not in a position to assist in meeting housing and traveller needs. EEBC to formally write to RBBC to confirm this position. No significant cross boundary issues identified for flood risk, sustainable transport choices, education and healthcare needs. Agreed to share evidence on these issues as it emerges.	Minutes available in appendix 8.
23/05/24	Mole Valley District Council (MVDC) Planning Policy Manager and Planning Policy Officer EEBC Planning Policy Manager and Principal Policy Officer	Mole Valley District Council DtC meeting Update on Local Plan position. DtC framework used to guide discussions, which included: housing needs/greenbelt, gypsy & traveller accommodation, the horse racing industry, sustainable transport choices, education and healthcare needs	None	MVDC not in a position to assist in meeting housing and traveller needs. EEBC to formally write to MVDC to confirm this position. Both authorities are still aligned in their approach to the horse racing industry. EEBC to share results of the Strategic Transport	Minutes available in appendix 8.

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
				Assessment & raise any potential issues. EEBC to inform MVDC should any issues be identified through the education and healthcare forecasts.	
23/05/24	Surrey County Council Education Place Planning (SCC) EEBC Principal planning Officer	Discussion on data required to generate education forecasts for the Local Plan using SCC's education place planning model.		Agreed scope of the information and dates for completion of the input data and likely receipt of forecasts.	
04/06/24	Jockey Club representatives EEBC Planning Policy Manager and Head of Place Development	<p>Jockey Club response to Reg 18 Local Plan Response submitted by Rapleys on behalf of the Jockey Club at Regulation 18 stage plan including treating equestrian and horse racing facilities differently through policy, the extent of the racehorse training zone and the importance of revenue from facilities at the racecourse from non-racing activities.</p> <p>Emerging West Suffolk District Council horse racing industry</p>	Inclusion of a specific policy within the Local Plan to apply to the extent of the Racecourse.	<p>Amendments to the extent of the racehorse training zone to be considered by EEBC and defining the extent of the racecourse on the policies map.</p> <p>Highlighted that as the racecourse is in the Green Belt, any planning applications for additional development at the racecourse would be determined against the Green Belt Policy but that wording</p>	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
		<p>policies and how they apply to Newmarket Racecourse.</p> <p>Importance of sustaining the racecourse.</p>		<p>reflecting this constraint could be included in a future iteration of the policy.</p> <p>Jockey Club to consider discussion and the provision of supplementary comments.</p>	
10/06/2024	SCC Transport Planners EEBC Planning Policy Manager	<p>Local Street Improvement Update</p> <p>Discussed Local Street Improvements programme and programme for Epsom and Ewell</p>	n/a	Discussed work programme	
11/06/24	Surrey County Council (SCC) Planning and Place Making Team EEBC Planning Policy Manager and Principal Policy Officer	<p>Key DtC meeting</p> <p>Update on Local Plan position. DtC framework used to guide discussions, which included: housing needs/greenbelt, gypsy & traveller accommodation, flood risk, sustainable transport choices, education and healthcare needs, biodiversity, infrastructure,</p>	None	<p>Constructive discussion with SCC providing advice and updates on certain matters.</p> <p>Ongoing work in relation to the Strategic Transport Assessment and education forecasts.</p>	Minutes available in appendix 8.

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
		heritage and SCC owned sites.			
09/07/24	Various LPA officers. SCC, NHS Surrey Heartlands CCG	Surrey Health and Planning Forum Discussed impact of fast food outlets and policies elsewhere, Buckinghamshire and the effectiveness of policies Discussion about mental health, gambling and importance of health	n/a		
02/07/24	SCC officers, Surrey Planning Policy Managers (or substitutes), external guest speakers	Surrey Planning Working Group SCC - Local Nature Recovery Strategy and BNG update SCC – Transport Studies Update SCC – LTP4 / Local Street Improvements Update Standing Items: - Heathrow / Gatwick Airports, Minerals and Waste Local Plan) Local Plan updates	n/a	Informed of progress with the LNRS. Informed of rolling programme with LSIs and that on to one meetings to be held with LPAs.	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
				EEBC inform attendees of intention to send letter requesting assistance with meeting housing/traveller needs in the near future.	
10/07/24	Letters sent to neighbouring authorities, wider Surrey authorities and those authorities just beyond the metropolitan green belt.	DtC engagement on housing and traveller accommodation needs Following the update of the LAA, a formal letter sent to partners requesting assistance in meeting housing and traveller needs.	n/a	9 responses received.	Responses received available in appendix 7.
31/07/2024	Sport England representative EEBC Planning Policy Manager and Principal Policy Officer	DtC Meeting with Sport England Emerging Local Plan and changes since Regulation 18 stage, including to proposed allocation sites and policy wording. Highlighted the removal of one greenfield site that is currently utilised for youth sport pitch provision	None	Sport England will respond to the formal Regulation 19 consultation.	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
		<p>Wording of Draft Policy DM19 – Open Space, Sport and Recreation</p> <p>Decision making steps for Proposed Submission Local Plan prior to consultation taking place.</p>			
06/08/24	<p>SCC Director of Public Health</p> <p>EEBC Planning Policy Manager and Principal Policy Officer</p>	<p>Epsom and Ewell Planning and Public Health</p> <p>Discussion about Health Impact Assessment and emerging policy in the Local Plan</p>	None	Discussed potential threshold for HIA	
04/09/24	<p>Senior SCC officers including the Director of Planning and Environment; EEBC Head of Place Development and EEBC Director of Environment, Housing and Regeneration.</p>	<p>Surrey County Council / EEBC Joint Prioritisation Meeting</p> <p>Surrey Infrastructure Plan (SIP) Update</p> <p>CIL</p> <p>Local Plan</p>	n/a	<p>Updated on key priority projects in EEBC, notably Ewell High Street Improvements scheme;</p> <p>EEBC's Licencing and Planning Policy Committee to consider endorsing LCWIP on 24/09.</p> <p>SCC strategic CIL bid for the Ewell High street</p>	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
				<p>project to be considered with others at committee on 17/10/24.</p> <p>Update provided on Local Plan timescales and that SCC services supporting EEBC to determine infrastructure needs</p>	
10/09/24	Surrey County Council Transport Planner EEBC Planning Policy Manager and Principal Planning Officer	Epsom and Ewell LSI Discussion on Local Street Improvements (LSI) programme and initial look at potential zones.	n/a	Initial discussion on potential zones	
17/09/24	Surrey County Council Transport Studies Team EEBC Principal Planning Officer	Catch up meeting to discuss progress with the Strategic Transport Modelling Report	n/a	Draft report to be received in October 24 with mitigation work to follow.	
18/09/24	Surrey County Council Education Place Planning Service Manager EEBC Principal Planning Officer	Discussion on the updated education place planning model & data that is required to re-run the forecasts to ensure they are up to date.	n/a	EEBC to send through any updated data. SCC to re-run forecasts.	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
19/09/24	NHS Property Services (NHSPS) NHS Surrey Heartlands (NHSSH) EEBC Principal Planning Officer	Discussion on Healthcare forecasts based on potential Local Plan trajectory and related IDP requirements. Discussion on specific primary healthcare requirements for potential greenfield site allocation (SA35: Horton Farm).	None	EEBC to send through IDP text for review. NHSSH to follow up with potential schemes to address impact. EEBC to send through more details as to what SA35: Horton Farm is likely to deliver. NHSSH requested the policy to offer flexibility for either on site facility or off-site financial contributions.	
19/09/24	Various LPA officers. SCC, NHS Surrey Heartlands CCG	Epsom and Ewell Planning and Public Health Discussed draft MoU, NPPF consultation, Health and Planning Development Day	n/a		
07/10/24	Natural England (NE) Sustainable Development Senior Advisor and Lead Advisor EEBC's appointed consultants Lepus representatives EEBC Planning Policy Manager and Principal Planning Officer	Meeting to agree the proposed approach and requirements for additional air quality modelling, based on habitat types within 200m of where AADTs have been exceeded.	n/a	Scope and requirements agreed in principle, to be followed up by EEBC's consultants (Lepus)	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
09/10/24	Senior SCC officers including the Director of Planning and Environment; EEBC Head of Place Development and EEBC Director of Environment, Housing and Regeneration.	Surrey County Council / EEBC Joint Prioritisation Meeting Surrey Infrastructure Plan (SIP) Update CIL Local Plan	None	SCC strategic CIL bid for the Ewell High Street project to be considered with others at committee on 17/10/24 Local Plan (Reg 19) update - to be considered by the Licencing and Planning Policy Committee in November.	
09/10/24	London Borough of Sutton (LBS) Planning Policy Manager and Principal Planner EEBC Planning Policy Manager and Principal Policy Officer	Key DtC meeting Update on Local Plan position. DtC framework used to guide discussions, which included: housing needs/greenbelt, gypsy & traveller accommodation, flood risk, sustainable transport choices, education and healthcare needs. Other strategic matters: employment.	None	LBS not in a position to assist in meeting housing (capacity uncertain) and traveller needs. EEBC to share results of the Strategic Transport Assessment. Agreement to share any new information on flood risk, healthcare, education and employment issues as they arise. LBS likely to be looking for assistance with meeting employment needs.	Minutes available in appendix 8.

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
09/10/24	Royal Borough of Kingston Upon Thames (RBK) Planning Policy Manager and Planning Policy Officer EEBC Planning Policy Manager and Principal Policy Officer	DTC meeting Meeting arranged by Kingston. Delay to RBK's Regulation 19 as reviewing potential implications of emerging NPPF. Increase in RBK's housing need relative to the London Plan figure. Increased employment and traveller needs. Not currently proposing to release Green Belt or MOL. Awaiting revised NPPF.	None	EEBC updated on progress with Local Plan and indicated that assistance could not be provided in meeting RBK's unmet needs (for housing, travellers and employment).	
15/10/24	SCC officers, Surrey Planning Policy Managers (or substitutes), external guest speakers	Surrey Planning Working Group BNG Update LNRS Update NHS Planning, Integrated Care Boards Estate Planning National Landscapes Update Co-Plug Update (Health needs forecasting);	n/a	Group updated that the intention is to take the Epsom and Ewell Reg 19 Local Plan to Committee in November 2024 and subject to their recommendation full Council in December 2024 with consultation to commence in January 2025.	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
		<p>Standing Items: - Heathrow / Gatwick Airports, Minerals and Waste Local Plan)</p> <p>AOB (including local plan updates)</p>			
17/10/24	Elmbridge Borough Council (EBC) Local Plans Manager and Principal Planner EEBC Planning Policy Manager and Principal Policy Officer	Key DtC meeting Update on Local Plan position. DtC framework used to guide discussions, which included: housing needs/greenbelt and gypsy & traveller accommodation.	None	EBC not in a position to be able to assist in meeting needs.	Minutes available in appendix 8.
22/10/24	NHS Property Services (NHSPS) EEBC Principal Policy Officer	Discussion on primary healthcare potential infrastructure requirements to be included in IDP	None	Agreed wording and schemes to be included the IDP.	
07/11/24	Surrey County Council Education Place Planning Service Manager EEBC Principal Planning Officer	Discussion on the interpretation of education forecasts from the updated model.	n/a	Clarity on the forecasts.	
08/11/24	NHS Property Services (NHSPS)	Discussion on policy wording related to primary healthcare	None	Policy wording amended to reflect NHS/Surrey	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
	EEBC Principal Policy Officer	requirements for policy SA35: Horton Farm		Heartlands ICB requirements.	
11/11/24	Surrey County Council Education Place Planning Service Manager EEBC Principal Planning Officer	Content of the IDP in relation to education provision and forecasts.		Agreed the wording of the education section of the IDP.	
04/12/24	SCC officers, Surrey Planning Policy Managers (or substitutes), external guest speakers	Surrey Planning Working Group Health Impact Assessments Walking and Cycling Infrastructure (SCC) Affordable Housing Workshop Feedback Standing Items: - Heathrow / Gatwick Airports, Minerals and Waste Local Plan) AOB (including local plan updates)	n/a	Group updated that Reg 19 Local Plan to be considered by Full Council on 10/12/24 and all papers published.	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
11/12/24	Senior SCC officers; EEBC Head of Place Development and EEBC Director of Environment, Housing and Regeneration.	Surrey County Council / EEBC Joint Prioritisation Meeting Surrey Infrastructure Plan (SIP) Update CIL Local Plan	None	Update that Local Plan (Reg 19) approved for consultation and submission on the 10/12/24.	
20/12/24 to 05/02/25	Statutory consultees and organisations/individuals on the Council's Local Plan consultation database.	Formal Consultation Stage Regulation 19 Proposed Submission Local Plan consultation	n/a	Numerous responses received. Summary of responses is contained in the Consultation Statement Part 2 Ref SD09a	
14/01/25	Surrey County Council Transport Development Planning EEBC Planning Policy Manager and Principal Policy Officer	Meeting to discuss potential mitigation of Local Plan transport impacts, specifically whether Horton Farm (SA35) and the likely increase in population would be significant enough to increase the existing services in the vicinity of this site.	None	Agreed that bus service improvement could be sought. SCC will include suggested amendments to policy wording in their Reg 19 representation.	

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
20/01/25	London Borough of Sutton (LBS) Planning Policy Manager and Principal Planner EEBC Planning Policy Manager and Principal Policy Officer	Key DtC meeting Update on Local Plan position. Overview of key changes from Regulation 18 consultation stage. Discussion on a SoCG	LBS were reviewing the plan & had no significant concerns at the time of the meeting.	LBS to submit a formal response to the Reg 19 consultation. EEBC to send an SoCG once the response has been reviewed.	Minutes available in appendix 8.
22/01/25	Natural England (NE) Sustainable Development Senior Advisor and Lead Advisor EEBC's appointed consultants Lepus representatives EEBC Planning Policy Manager and Principal Planning Officer	To discuss the results and ecological interpretation of the additional air quality modelling work and the implications for the final Habitats Regulations Assessment. The need for an SoCG.	None	NE to review the ecological interpretations. Will respond to the Reg 19 consultation based on the Interim HRA.	
27/01/25	Mole Valley District Council (MVDC) Planning Policy Manager and Planning Policy Officer EEBC Planning Policy Manager and Principal Policy Officer	Key DtC meeting Update on Local Plan position. Overview of key changes from Regulation 18 consultation stage. Discussion on a SoCG	MVDC were reviewing the plan & had no significant concerns at the time of the meeting.	MVDC to submit a formal response to the Reg 19 consultation. EEBC to send an SoCG once the response has been reviewed.	Minutes available in appendix 8.

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
29/01/25	Surrey County Council (SCC) Planning and Place Making Team representatives EEBC Planning Policy Manager and Principal Planners	Key DtC meeting Update on Local Plan position. Overview of key changes from Regulation 18 consultation stage. Some discussion on what may be included in SCC Reg 19 response. Discussion on a SoCG	No significant concerns raised. Potential disagreement on the wording of policy SA35.	SCC to submit a formal response to the reg 19 consultation. EEBC to send an SoCG once the response has been reviewed.	Minutes available in appendix 8.
30/01/25	Royal borough of Kingston upon Thames (RBK) Planning Policy Manager and Planning Policy Officer EEBC Planning Policy Manager and Principal Policy Officer	Key DtC meeting Update on Local Plan position. Overview of key changes from Regulation 18 consultation stage. Discussion on a SoCG	RBK were reviewing the plan & had no significant concerns at the time of the meeting.	RBK to submit a formal response to the Reg 19 consultation. EEBC to send an SoCG once the response has been reviewed.	Minutes available in appendix 8.
30/01/25	Elmbridge Borough Council (EBC) Local Plans Manager and Planning Policy and Strategy Manager EEBC Planning Policy Manager and Principal Policy Officer	Key DtC meeting Update on Local Plan position. Overview of key changes from Regulation 18 consultation stage. Discussion on a SoCG	EBC were reviewing the plan. No significant concerns raised at the meeting.	EBC to submit a formal response to the Reg 19 consultation. EEBC to send an SoCG once the response has been reviewed.	Minutes available in appendix 8.
31/01/25	Reigate & Banstead Borough Council	Key DtC meeting Update on Local Plan position.	MVDC were reviewing the plan & had no	MVDC to submit a formal response to the Reg 19 consultation.	Minutes available in appendix 8.

Date	Organisation(s) & Attendees (if relevant)	Matters discussed	Areas of disagreement	Outcome	Documents or minutes available
	(RBBC) Planning Policy Manager EEBC Planning Policy Manager and Principal Policy Officer	Overview of key changes from Regulation 18 consultation stage. Discussion on a SoCG	significant concerns at the time of the meeting	EEBC to send an SoCG once the response has been reviewed.	

[REDACTED]
Head of Planning
By email only

Our ref: DTC/Epsom & Ewell
Your ref: Duty to Cooperate:
Housing Land Supply

30 November 2022

Dear [REDACTED]

Thank you for your letter of the 18th November 2022. Within the letter, you state that you are unable to meet your needs for housing and may not be able to provide for a sufficient amount of gypsy and traveller provision in your forthcoming Local Plan. You therefore ask as to whether we could help address unmet needs and offer a meeting/phone call to discuss.

Firstly, we recognise the importance of the duty to cooperate and the need for continual dialogue between authorities to address strategic matters. This is evidenced by the fact that our adopted Local Plan, the Horsham Development Planning Framework (HDPF), includes allocations and policies to meet our housing needs in full and also 50% of Crawley Borough Council's unmet need.

For your information, we have immediate deadlines as our Regulation 19 Local Plan is due to be considered by Cabinet on 15th December 2022 and by Council on 11th January 2023. As such, we are unable to schedule a meeting until the new year. Similarly, the timescales involved mean that we do not have the ability to look at your land availability assessment, Gypsy and Traveller Accommodation Assessment or any other evidence base documents that you may have produced in order to conclude that you cannot meet your unmet needs in advance of the 9th December deadline stated in your letter.

Despite this, we do wish to assist the development of your work and therefore provide an explanation of our position with regards to local plan making.

You may be aware that in July 2021, our Cabinet recommended to Council that the [draft Regulation 19 Local Plan](#) be approved for publication. The draft Plan set an annualised housing target of 1,100 per year – a figure beyond HDC's standard methodology calculation in order to meet our needs in full, 50% of the unmet needs of Crawley Borough Council (with whom we share our primary housing market area), as well as a small allowance for Sussex coastal areas (with whom we share a secondary housing market area). Such a figure was towards the top end of what our evidence base stated could be delivered and included a stepped trajectory to ensure that a five-year housing land supply can be maintained during the plan period.

Prior to our full Council having the opportunity to consider the Regulation 19 Plan, the NPPF was revised. Counsel advice was received on these amendments that stated that changes were necessary to make the plan sound and in line with the revisions to national policy. Subsequently, Cabinet and Council dates were set up for November that year to progress an updated draft Local Plan.

On 14th September 2021, this Council, together with Crawley Borough Council and Chichester District Council received a [Position Statement](#) from Natural England. It outlined that water in the district is sourced from the Arun Valley, which includes sites protected by the Habitats Regulations. It further explained that it cannot be concluded that the existing abstraction is not having an adverse impact on these protected sites. The Position Statement requires that that new development must not add to this impact.

The impact of this Position Statement is that we are currently unable to determine planning applications positively unless water neutrality can be demonstrated. The impact of this has been large – as of the end of October 2022, we had approved 128 homes since the receipt of the Position Statement. To put this into context, in the three years prior to the Covid pandemic, our average annual housing delivery was just under 1,200 per annum.

The impact of the Position Statement on our Local Plan has been similarly severe, as this must also demonstrate that it is water neutral. Its preparation has been significantly delayed to allow the affected authorities to develop an evidence base to both understand the issue and determine a way forward. Our work on water neutrality has now been uploaded to our [evidence base webpage](#). The upshot of such work is that the capacity of Horsham District to deliver development is now limited due to the need for all development to be water neutral. As such, the Regulation 19 Local Plan scheduled to be considered by December's Cabinet will not be able to meet the amount of development identified in the version of the Regulation 19 Local Plan considered by Cabinet in July 2021 and will have a housing target below our standard methodology figure. Similarly, we will not be able to identify sufficient sites to fully meet our need for gypsy and traveller provision. It is therefore likely that we shall be writing to authorities to request assistance with meeting unmet development needs in due course.

We are therefore not in position to meet your unmet needs. Even if we were able to meet unmet housing needs, our priority is to meet those within our primary and secondary housing markets – which you will be aware does not include your borough.

As a separate point, we note that within your letter you state that only 37% of the calculated housing need could be met in the urban area and identify concerns relating to the impact of high-density development with your urban area on the character of your borough. Given this position, we note that there is no mention in your letter of whether your rural area could accommodate some or all of the remaining unmet needs, and nor did you reference any work that may be underway to explore this. Whilst we are aware that your rural area lies within the Green Belt, this does not mean that its development potential should not be investigated as part of the Local Plan process, particularly if it is apparent that there is no capacity for unmet needs to be accommodated elsewhere.

I hope that the letter is clear. If you require clarification please contact Tal Kleiman, Senior Planning Policy Officer, [REDACTED] or [REDACTED] in the first instance.

Yours sincerely,

[REDACTED]

[REDACTED]

Head of Strategic Planning



██████████ Head of Planning
Epsom & Ewell Borough Council
Town Hall
The Parade
Epsom
Surrey
KT18 5BY

By Email to localplan@epsom-ewell.gov.uk

30 November 2022

Dear ██████████

Duty to Cooperate: Housing Land Supply

I am writing in response to your letter dated 18 November 2022 regarding Epsom and Ewell Borough Council's (EEBC) residual unmet housing need and Gypsy and Traveller needs.

Bracknell Forest's Local Plan (BFLP)

The emerging BFLP is at an advanced stage. It covers the period 2020-2037 and was submitted for examination on 20 December 2021. Stage 1 hearing sessions were held between 10 May and 15 June 2022, with Stage 2 hearings being held between 18 and 20 October 2022. The Inspectors' post hearings letter is now awaited.

The majority of development planned in the BFLP is in Bracknell Town and the north of the Borough, on land at Jealott's Hill. The latter involves releasing land from the Green Belt on grounds of exceptional circumstances related to an existing business on the site. The southern part of Bracknell Forest is either built up or highly constrained.

Housing

It is noted from your letter that EEBC have an overall need of 576 dpa, amounting to 10,368 dwellings over the plan period 2022-2040, with a potential unmet need of 6,500 dwellings to 2040. In the first instance we would expect you to look at all means of accommodating your unmet need within your own Housing Market Area.

The letter only refers to EEBC having explored the capacity of existing housing commitments and urban areas. It is unclear whether all opportunities have been explored, for example in relation to whether any exceptional circumstances exist in relation to release of land within the existing Green Belt, or consideration of brownfield sites outside of existing urban areas.

PLACE, PLANNING AND REGENERATION DIRECTORATE

Bracknell Forest Council, Time Square, Market Street, Bracknell, Berkshire RG12 1JD
T: 01344 352000 www.bracknell-forest.gov.uk

Meeting the growth needs of Bracknell Forest has been challenging due to the extent of the built up area and constraints affecting sites that were submitted for consideration. Whilst the sites put forward for allocation result in a small surplus in terms of our housing need, this may be required to cover variations in numbers achieved on sites allocated through the Site Allocations Local Plan (2013) and to assist with identified unmet need within our own Housing Market Area. Furthermore, there will ultimately be a need to address the 35% uplift applied to Reading Borough Council (within the same Housing Market Area as Bracknell Forest) under the Standard Method.

Regrettably, this Council is therefore not in a position to help EEBC with its unmet housing needs.

Gypsy and Travellers

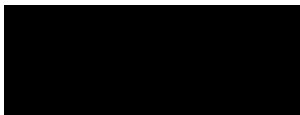
It is noted from your letter that EEBC have an overall need of 10 pitches (meeting the planning definition), over the plan period 2022-2040. It is noted that EEBC are currently exploring opportunities to meet the needs identified, but are requesting whether other Authorities are able help with meeting any of the identified needs.

It is noted that the EEBC Gypsy and Traveller Accommodation Assessment (June 2022) does not identify any need for Travelling Showpeople, nor any need for formal public transit requirements.

Prior to submission of the BFLP, Bracknell Forest Council (BFC) undertook Duty to Co-operate discussions with surrounding Local Planning Authorities (LPAs) in January 2021 asking for assistance in helping to meet its Gypsy and Traveller pitch needs. No LPA was in a position to assist, and as a result, BFC is having to propose the release of a new site from the Green Belt on land at Jealott's Hill. As meeting its own needs has been challenging, BFC is regrettably unable to assist with helping to meet EEBC Gypsy and Traveller pitch needs.

If you have any queries regarding this letter, please do not hesitate to contact the Development Plan Team, set out below.

Yours sincerely,



Assistant Director: Planning
Place, Planning & Regeneration
Bracknell Forest Council

cc. Development Plan Team development.plan@bracknell-forest.gov.uk

PLACE, PLANNING AND REGENERATION DIRECTORATE

Bracknell Forest Council, Time Square, Market Street, Bracknell, Berkshire RG12 1JD
T: 01344 352000 www.bracknell-forest.gov.uk



Your reference

Contact: [REDACTED]

Our reference: DC250

Telephone: [REDACTED]

Email [REDACTED]

[REDACTED]
Head of Planning
Epsom and Ewell Borough Council
Town Hall
The Parade
Epsom
Surrey
KT18 5BY

Date 02 December 2022

Dear [REDACTED]

Duty to Cooperate: Housing Land Supply

Thank you for your letter dated 18 November 2022.

Rushmoor Borough Council adopted its Local Plan, which meets the Borough's objectively assessed housing need over the Local Plan period (2014-2032), in February 2019.

As an urban authority reliant on the redevelopment of brownfield sites to meet housing need and with significant environmental constraints in the form of land designated as the Thames Basin Heaths Special Protection Area, meeting our objectively assessed housing need for the Local Plan was a challenge.

Considering the recent adoption of our Local Plan and the constrained nature of our Borough, we are unable to meet any of Epsom and Ewell Borough Council's unmet housing need and are unable to offer any sites for Gypsy and Traveller pitches, and this position is unlikely to change in the future.

Yours sincerely

[REDACTED]

[REDACTED]
Corporate Planning Manager

[REDACTED]
Head of Planning
Epsom & Ewell Borough Council
Town Hall
The Parade
Epsom, KT18 5BY

contact: [REDACTED]
Head of Planning &
Environmental Health
direct line: [REDACTED]
e-mail: [REDACTED]
my ref: LP/DTC/Epsom & Ewell
your ref:

Sent via email

13 December 2022

Dear [REDACTED]

Duty to Co-operate: Housing Land Supply

Thank you for your letter dated 18 November 2022, asking whether Elmbridge Borough Council can help to meet any unmet housing need arising from Epsom & Ewell.

As with many other authorities, Elmbridge is currently in the process of preparing its Local Plan and has recently (June / July 2022) completed its Regulation 19 pre-submission representation period. The draft Local Plan sets out our preferred growth strategy for the borough, which is to provide 452 dwellings per annum (6,780 dwelling across the plan-period).

In determining the preferred growth strategy for the borough, the council has taken into account the need to balance the provision of new homes with environmental and policy constraints. For example, a notable proportion of the borough is at risk of flooding from the comprehensive river network including the Thames, Mole and Wey including their tributaries; is impacted by the Thames Basin Heaths Special Protection Area; and 57% of the borough is designated as Green Belt.

Taking into account such constraints, the council is not planning on meeting its local housing need figure (as set by the Government's Standard Methodology); there will be a circ. 30% shortfall. The council considers its position to be in accordance with paragraph 11b(i) and (ii) of the National Planning Policy Framework (NPPF, 2021).

Elmbridge Borough Council is therefore unable to assist in meeting any potential unmet need arising from Epsom & Ewell. This is also the council's position regarding any potential unmet need for Gypsy and Traveller pitches.

Our position is well known having been shared between officers from our authorities as part of our on-going Duty to Cooperate discussions and the council undertaking a similar exercise in January 2020 and October 2021, contacting all authorities in the South East and neighbouring authorities to ask whether any of our unmet need can be met through the assistance of others.

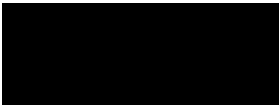
We appreciate the Epsom & Ewell has similar constraints to meeting its development needs and is now undertaking a similar exercise.

As you know, we are keen to continue to work with you and other authorities to meet the identified development needs of our areas, ensuring that the best and most suitable sites are brought forward for development and that other strategic planning matters are continuously addressed with the key principles of sustainable development at the forefront.

Therefore, should our position change and Elmbridge is able to assist Epsom & Ewell in meeting its unmet need, officers will raise this with you as part of our on-going commitment to positive engagement.

Regarding our own Local Plan, officers will be in contact with you in the New Year to set up a meeting to discuss a Statement of Common Ground which sets out our respective positions to date.

Yours sincerely,

A large black rectangular redaction box covering the signature of the Head of Planning Services.A small black rectangular redaction box covering the name of the Head of Planning Services.

Head of Planning Services
Elmbridge Borough Council



Epsom and Ewell Borough Council
Sent via email only to:

localplan@epsom-ewell.gov.uk

**Executive Head Regeneration and Planning
Policy**

E-mail: [REDACTED]

Direct line: [REDACTED]

Calls may be recorded for training or monitoring

Date: 01/12/2022

Dear Sir/Madam,

Duty to Co-operate: Housing Land Supply

Thank you for your letter of 18 November 2022 regarding meeting your housing and gypsy and traveller pitch requirements through the emerging Epsom and Ewell Local Plan.

The Waverley Borough Local Plan will comprise Local Plan Part 1 (LPP1) and Local Plan Part 2 (LPP2). LPP1 was adopted in February 2018 and establishes the annual housing target for the Borough and includes strategic housing allocations. As you will know the Council's housing requirement in LPP1 seeks to meet both Waverley's needs and also a proportion of unmet need from Woking. The Council is not actively planning to deliver housing above this target, and in the circumstances, I do not consider that Waverley is in a position to assist in meeting the unmet housing need from the borough of Epsom and Ewell.

In terms of meeting the accommodation needs of the gypsy and traveller community, the Council has identified a need for 17 gypsy and traveller pitches up to 2032 and is proposing to meet this need through planning permissions granted post the base date and site allocations for 15 pitches in Local Plan Part 2 (LPP2). It is not considered that Waverley is in a position to assist in meeting the unmet need from Epsom and Ewell Borough at this time.

Please note the Council will be undertaking a review of LPP1 to establish whether or not it requires updating. The review will need to be completed by February 2023 and will consider the position of neighbouring areas meeting their local housing need as part of this review.

This is an officer response in liaison with the portfolio holder for planning.

Yours faithfully

[REDACTED]
Executive Head Regeneration and Planning Policy

9th December 2022

[REDACTED]
Head of Place Development
Epsom and Ewell Borough Council
The Parade
Epsom
Surrey KT18 5BY

Dear [REDACTED]

Thank you for your letter of 18 November regarding housing land supply.

apa i yo ole alley is i oun il o a ommoda e unme need om Epsom and Ewell o oug oun il EE

In answer to the principal question in your letter, MVDC is unable to accept any unmet housing need from EEBC. This was made clear in the [Statement of Common Ground](#) between the two authorities, signed by Cllrs Cooksey and Reeve on 28 July 2021 and following a presentation of sources of MVDC supply and discussion on 15 July 2021.

MVDC notes that the information provided on 15 July 2021 was considerably more information than you are now providing for MVDC in order to answer the same question.

Epsom and Ewell's Housing Land Supply

You may wish to reflect on whether meeting 37% of Local Housing Need constitutes an exhaustive search for deliverable and developable sites. In attempting to meet your need, or at least getting to MVDC and Elmbridge BC levels, MVDC would suggest the following:

- **e ieuw o e apa i yo e u an a ea** MVDC notes [Table 7 the 2018 Urban Capacity Study](#) identified a supply of 4,957 units against your current identified supply of 3,849 units. To lose over 1,000 units of housing capacity in the urban area in four years seems curious.
- **e appli a ion o ig e densi ies in e u an a ea** as referred to in your letter. This is required, in any event, in Paragraph 119 of the National Planning Policy Framework.
- **e elease o een el land** At the strategic level, there certainly seems to be valid reasons for releasing Green Belt land in Epsom and Ewell. Notably, there appears to be an acute need for housing, thereby meeting Calverton test 1, and evidenced by the facts that:
 - The ratio of median houses price to median gross workplace earnings in 2021 was 17.98 in Epsom and Ewell (compared to 13.84 in Mole Valley which is releasing Green Belt). This makes EEBC the 8th least affordable local authority area for house buying out of 330.

- The 2021 Housing Delivery Test for Epsom and Ewell was 35% (compared to 70% in Mole Valley, which is releasing Green Belt) making EEBC the joint 3rd worst local authority for housing delivery out of 291.

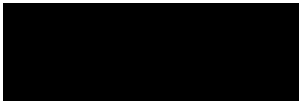
Furthermore, at the local level, Page 73 of the [2018 Epsom and Ewell Green Belt Review](#) identifies at least three parcels of Green Belt land that are considered suitable for release.

unmet Gypsy and Traveller need

Turning to unmet Gypsy and Traveller need, the Statement of Common Ground (*qv*) states that both authorities will seek to meet their own need within their local authority areas. The position is unchanged for MVDC and it is unable to provide for unmet Gypsy and Traveller need from other authorities.

If you have any further questions, please do not hesitate to contact me.

Yours sincerely,



Planning Policy Manager
Mole Valley District Council

Contact:

E-Mail:

Your Ref:

Our Ref:

Date: 8 December 2022

Head of Planning
Epsom & Ewell Borough Council

By email

Dear

Duty to Cooperate: Housing Land Supply

Thank you for your letter of 18 November 2022. Please see below Mid Sussex District Council's response to your enquiry on the ability of Mid Sussex to assist Epsom & Ewell Borough Council in meeting its unmet housing need.

Mid Sussex Context

By way of context, it is perhaps helpful to set out the current position of Mid Sussex in terms of Plan making, housing requirement and its Housing Market Area (HMA).

Mid Sussex sits in the Northern West Sussex HMA, along with Crawley Borough Council (to the north) and Horsham District Council (to the west). Within the HMA, Crawley is unable to meet its housing need in full and the unmet need arising is currently met by Mid Sussex and Horsham Districts. The southern part of the district is adjacent to the Coastal West Sussex HMA, which includes Brighton and other coastal authorities. This HMA also has a high level of unmet need.

The Mid Sussex District Plan (2014 - 2031) was adopted in 2018. The District Plan has a housing requirement of 16,390. This is made up of the Mid Sussex Objectively Assessed Housing Need of 14,892 dwellings and 1,498 dwellings to ensure unmet need is addressed in the Northern West Sussex HMA; primarily Crawley's unmet need.

District Plan Policy DP4: Housing commits the Council to preparing a Site Allocations Development Plan Document (DPD) to identify additional housing and employment site to ensure the need is met in full over the Plan period. The Site Allocations DPD was adopted in June of this year.

District Plan Policy DP5: Planning to Meet Future Housing Need, commits the Council to continuing to work with "all other neighbouring local authorities on an ongoing basis to address the objectively assessed need for housing across the Housing Market Areas, prioritising the Northern West Sussex HMA as this is established as the primary HMA". This policy also commits the Council to working with the Greater Brighton strategic Planning Board to address unmet housing need in the sub region.

Working together for a better Mid Sussex

Epsom & Ewell Unmet Housing Need

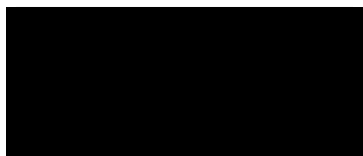
The Council started its District Plan Review early last year. Over the last 18 months or so a number of key evidence documents have been progressed to enable us to reach Regulation 18 stage. Our District Plan Consultation Draft (2021 – 2039) is currently out for public consultation until 19 December 2022. The draft Plan and supporting evidence is available to view on the [District Plan Review webpage](#).

At this point in time, the draft Plan identifies sufficient housing sites to meet our revised identified housing need of 20,142 dwellings to 2039 (Policy DPH1: Housing), with a small over supply. If, as the draft Plan progresses, Mid Sussex are able to assist neighbouring local authorities with their unmet housing need then it would look to those within the Northern West Sussex HMA as the first priority, followed by the Greater Brighton area. It therefore remains very unlikely that Mid Sussex would have sufficient capacity remaining to be able to assist with meeting the unmet need arising from Epsom & Ewell.

With regards to Gypsy and Traveller accommodation, an updated Gypsy and Traveller Accommodation Assessment (GTAA) has been undertaken for Mid Sussex district, including the areas of the district that fall within the South Downs National Park (SDNP). Policy DPH29: Gypsies, Travellers and Travelling Showpeople within our draft Plan identifies a need of 16 pitches within the district, outside of the SDNP. Taking into account commitments, there is a residual need of four pitches which are proposed to be met on one of our significant site allocations. The SDNP's current unmet need is four pitches. Given the geographical context of the GTAA, if we were able to sustainably meet any unmet pitch need we would likely prioritise that of the SDNP and/ or immediate neighbouring authorities.

I hope the above information clearly sets out our current position.

Yours sincerely



[Redacted Name]

Principal Planner
Planning Policy

Working together for a better Mid Sussex



[REDACTED]
Head of Planning
Epsom & Ewell Borough Council
Town Hall
The Parade
Epsom
Surrey
KT18 5BY

Please reply to:
Contact: [REDACTED]
Department: Strategic Planning
Service: [REDACTED]
Direct line: [REDACTED]
Email: [REDACTED]
Our ref: [REDACTED]
Date: 02 December 2022

RE: Duty to Cooperate: Housing Land Supply

Dear [REDACTED]

Thank you for letter dated 18 November querying as to whether Spelthorne can help to meet any of Epsom and Ewell's unmet housing need.

As with many other authorities in the South East, Spelthorne is a very constrained borough with 65% designated as Green Belt and 26% of this comprising reservoirs. In addition, a notable proportion of the Borough is at risk of flooding from the River Thames and its tributaries. As such, we face the challenge of meeting our own housing needs within a constrained environment.

Spelthorne has recently submitted its Local Plan for examination with the spatial strategy encompassing the following elements: increasing densities in town centres and near transport facilities where the character can accommodate it; making use of a masterplan approach for Staines; and releasing some weakly performing Green Belt that would not adversely affect the integrity of the strategic Green Belt. As Spelthorne is unable to meet its housing needs in full in the urban area alone, a spatial strategy that includes a limited amount of Green Belt release was deemed to be the most sustainable and balanced approach.

Given the constrained nature of the wider area, Spelthorne Borough Council feels that it is appropriate for Epsom and Ewell to review its spatial strategy and exhaust all possible options, leaving 'no stone unturned' in endeavouring to meet its housing needs within its own boundaries in the first instance. Epsom and Ewell have previously identified spatial strategy options that include the release of Green Belt to help meet development needs therefore we feel that there is insufficient justification for pursuing a strategy that does not do so. Furthermore, we are concerned that adopting a strategy that does not do more to meet needs has the potential to increase pressure on other nearby authorities.

Further to this, Spelthorne feels that it is appropriate for Epsom and Ewell to work with more immediate neighbouring authorities in addressing its unmet housing needs in the first instance and explore those areas with strong housing market ties. The Spelthorne Strategic Housing Market Assessment identifies very weak linkages with Epsom and Ewell and we therefore query the effectiveness with which housing provision in Spelthorne would help address the needs of Epsom and Ewell.

Whilst Spelthorne intends to meet its housing needs within its borough boundaries, our housing trajectory shows that we have a small buffer to allow for under delivery and therefore we do not have any spare capacity to assist neighbouring authorities, including the needs of

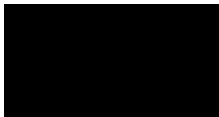
Gypsy and Travellers. Following the closure of our Regulation 19 consultation, Spelthorne assessed the impacts of an alternative higher growth scenario, however following an assessment of individual sites plus a Sustainability Appraisal it was concluded that the adverse impacts were deemed to outweigh the positive. As such this option was subsequently discounted.

Furthermore, we note that the Epsom and Ewell Local Plan period runs from 2022 – 2040, totalling an 18 year plan period. Spelthorne queries whether a shorter plan period has been considered to reduce the need to plan for as many dwellings. The five year review stage would then allow for an assessment of the Local Plan in light of the current housing land supply position.

Given the above constraints and the current housing position of Spelthorne, we are not in a position to assist Epsom and Ewell in helping to meet its housing needs. It is important for Duty to Cooperate discussions to take place on an ongoing and active basis throughout the preparation of the Local Plan therefore we will continue to engage with Epsom and Ewell moving forwards.

Should you have any queries regarding the above please do not hesitate to contact me.

Kind regards,



Strategic Planning Manager

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[REDACTED]

From: Planning Policy <PlanningPolicy@guildford.gov.uk>
Sent: 29 November 2022 11:05
To: Local Plan
Cc: [REDACTED]
Subject: RE: DTC Housing Land Supply. Epsom and Ewell [UNC]

Dear [REDACTED]

We note that you have sought to optimise densities within your urban areas in order to boost the supply of homes to meet your identified need. However it is not clear what assessment has been undertaken to understand whether further development needs could be sustainably met on land currently designated as Green Belt. Government's objective is that local planning authorities should significantly boost the supply of homes and national policy requires that the local plan should provide a strategy which, as a minimum, seeks to meet objectively assessed need (OAN). Within this policy context, Guildford adopted the Local Plan: strategy and sites (LPSS) in April 2019. This plan allocates sufficient homes to meet Guildford's full OAN with an appropriate level of supply over and above the minimum requirement to ensure that the OAN can actually be delivered over the plan period and a rolling five year land supply can be maintained. The provision of headroom that is included in the plan has been tested through the High Court and found to be justified. It is important to stress that this is not surplus supply and cannot therefore contribute towards meeting unmet needs from elsewhere. In order to achieve what is considered to be a robust plan, GBC allocated a significant number of Green Belt sites, including traveller sites.

The LPSS identifies sufficient permanent pitches and plots to meet the needs of local Gypsies, Travellers and Travelling Showpeople who meet the definition of a traveller set out in Planning Policy for Traveller Sites. However, it also seeks to meet the identified needs of travellers within our area who do not meet the planning definition, and also make provision for permanent pitches to meet potential additional need of local households of unknown traveller planning status. We have allocated these sites by reviewing our Green Belt and inseting sites from the Green Belt where appropriate.

There is built in flexibility to meet any future arising local needs through the requirement to provide pitches or plots on development sites of over 500 homes whilst there remains an identified need. However it is worth noting that not all the homes within strategic development sites will be delivered within the Local Plan period, therefore not triggering the thresholds requiring the provision of pitches or plots if there remains an identified need in our borough. For these reasons GBC do not consider that the level of sites identified is, in reality, much greater than needed and there is therefore no surplus that could be considered to meet any unmet needs arising from elsewhere.

The approach to Green Belt release has also been tested through the High Court which has confirmed that housing need can and should form part of the exceptional circumstances test. For these reasons GBC consider that a thorough and robust approach will be necessary in demonstrating that Epsom and Ewell's housing needs cannot be met in full.

If, following further work, it can be successfully demonstrated that the constraints within your borough are such that the full housing need cannot be met within your borough, then the duty to cooperate should be used to explore the extent to which unmet needs can be met elsewhere. In the context of the above, and your request, Guildford borough is unable to meet any unmet housing need from Epsom and Ewell. In any case, The West Surrey Strategic Housing Market Assessment finds limited functional links and concludes the boroughs sit within different housing market areas. GBC consider that if unmet needs do need to be met elsewhere then in the first instance this should be directed to local authorities within your housing market area.

Planning Policy
Guildford Borough Council

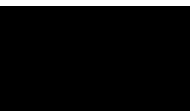
From: Local Plan <LocalPlan@epsom-ewell.gov.uk>
Sent: 18 November 2022 11:57
Subject: DTC Housing Land Supply. Epsom and Ewell

Dear Sir/Madam

Please find attached a letter regarding Housing Land Supply.

If you wish to discuss the content of the letter please let me know and we can arrange a meeting or phone call.
We would be grateful for a response by 9 December 2022

Regards



Principal Planning Policy Officer
Epsom & Ewell Borough Council



Web: www.epsom-ewell.gov.uk

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[REDACTED]

From: [REDACTED]
Sent: 29 November
To: Local Plan
Cc: Planning Policy
Subject: Re: DTC Housing Land Supply. Epsom and Ewell

Dear [REDACTED]

Please can I ask why you are approaching Hart District Council on this matter? We do not adjoin Epsom & Ewell and are some distance away.

Thanks

[REDACTED]
Planning Policy and Economic Development Manager
Hart District Council

[REDACTED]
<http://www.hart.gov.uk>
Twitter: [@HartCouncil](https://twitter.com/HartCouncil)
Facebook: [/HartDistrictCouncil](https://www.facebook.com/HartDistrictCouncil)

From: Local Plan <LocalPlan@epsom-ewell.gov.uk>
Sent: 18 November 2022 11:57
Subject: DTC Housing Land Supply. Epsom and Ewell

CAUTION: This email originated from outside of Hart District Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

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Dear Sir/Madam

Please find attached a letter regarding Housing Land Supply.

If you wish to discuss the content of the letter please let me know and we can arrange a meeting or phone call. We would be grateful for a response by 9 December 2022

Regards

[REDACTED]
Principal Planning Policy Officer
Epsom and Ewell Council
Tel: [REDACTED]
Web: www.epsom-ewell.gov.uk

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Team: Planning Services
Our Ref: Reg19 Plan Publication
Tel: 01276 707100
Email: planning.consultation@surreyheath.gov.uk

Surrey Heath Borough Council
Surrey Heath House, Knoll Road,
Camberley, Surrey GU15 3HD
Web: www.surreyheath.gov.uk

[REDACTED]
Head of Development
Epsom and Ewell Borough Council
By email

23 November 2022

Dear [REDACTED]

Duty to Co-operate: Housing Land Supply

Thank you for your letter dated 18th November 2022 regarding housing land supply in Epsom and Ewell and the findings of recent housing supply work.

As you may be aware, Surrey Heath Borough Council is also in the process of preparing a new Local Plan with publication of a Regulation 19 Local Plan due in the New Year. Like your own Borough, Surrey Heath Borough has significant constraints and faces a number of challenges in meeting its own housing needs. Over 44% of land within the Borough comprises metropolitan Green Belt and 42% of the Borough is affected by the Thames Basin Heaths Special Protection Area (TBHSPA) and its associated buffer zone. In total, over 80% of the Borough is affected by designations that limit the availability of land for development.

Against this backdrop, the Council has undertaken extensive work to identify sites to deliver new homes to meet the standard methodology requirement and to provide for Gypsy and Traveller and Travelling Showpeople needs. Housing capacity work has continued to show a shortfall over the Plan period (2019 – 2038). Arising out of discussions at the Hart Local Plan examination, the adopted Hart Local Plan makes provision for 41 dpa over the Hart Plan period of 2014 – 2032. In view of the evidence demonstrating a continuing shortfall in housing capacity in Surrey Heath, Hart District Council has confirmed the continued provision of 41 dpa over the overlapping plan periods to meet unmet needs in Surrey Heath.

Surrey Heath Borough would not, therefore be able to meet any unmet housing needs from Epsom and Ewell Borough.

With regards to Gypsy and Traveller pitches, the same constraints apply within Surrey Heath as for general housing. You will be aware from previous correspondence (most recently in August of this year), that the Council has been unable to identify sufficient sites

to meet the full identified needs over the Plan period. Surrey Heath Borough would not, therefore be able to meet any unmet Gypsy and Traveller needs from Epsom and Ewell Borough.

Should you have any queries regarding the above, or would like further discussion, please do not hesitate to contact me at jane.reeves@surreyheath.gov.uk or on 01276 707213.

Yours sincerely,

[Redacted Signature]

[Redacted Name] BSc (Hons), MSc, DMS, MRTPI
Planning Policy and Conservation Manager



Planning Services
Finance and Customer Service Directorate
Surrey Heath Borough Council

Contents

Duty To Cooperate Framework: Consultation Draft..... 2

Duty To Cooperate Framework: Table of Issues..... 26

Duty To Cooperate Framework: Consultation email example..... 31

Duty To Cooperate Framework: Consultation response summary..... 31

Duty To Cooperate Framework: Consultation responses..... 36

Epsom and Ewell
Local Plan 2022-2040



Duty To Co-operate Framework

May 2022

Contents

1	Introduction.....	1
1.1	Purpose of this DTC Framework.....	1
2	Defining Duty to Cooperate Bodies	2
2.1	Local Planning Authorities	2
2.2	Prescribed Bodies.....	2
2.3	Existing mechanisms	3
2.4	Responding to Duty to Cooperate Requests.....	4
3	Strategic Matters to be addressed within a Local Plan.....	6
4	Identified strategic cross boundary issues, relevant DTC bodies and method of engagement.....	7
4.1	Meeting identified housing needs within the borough and wider unmet housing needs.....	7
4.2	Meeting the identified need for Gypsy and Traveller accommodation within the borough and wider unmet needs.....	10
4.3	Meeting economic development needs: Addressing the impact of the potential redevelopment of industrial land.....	13
4.4	Supporting the local economy: the horse racing industry	14
4.5	Flood risk (principally from surface water)	15
4.6	Improve sustainable transport choices, particularly in association with new development	17
4.7	Meeting education needs.....	18
4.8	Meeting healthcare needs.....	20
	Appendix 1	22

1 Introduction

This draft framework has been prepared for the purposes of consulting with the Council's Duty To Co-operate bodies to ensure there is early consensus on the strategic cross boundary issues that need to be addressed in the preparation of the EEBC's Local Plan 2022-2040. This document will be updated in response to the comments received, where appropriate.

The final framework will form part of the Council's Local Plan evidence base with regards to the DTC. It is considered to be a live document, which will be updated throughout the preparation of the Local Plan 2022-2040.

The framework is not a statement of common ground (SCG) but will help provide the context as to how any SCGs have resulted. These SCG alongside this framework will form the evidence required to demonstrate compliance with the DTC.

1.1 Purpose of this DTC Framework

This Framework forms part of the Council's evidence to help demonstrate that it is engaging constructively, actively and on an on-going basis, and how the duty has been embedded in the EEBC's plan making process. Specifically, the framework:

- Identifies the DTC bodies EEBC will engage with on strategic matters and identifies existing mechanisms for engagement.
- Identifies the broad strategic matters as set out in the National Planning Policy Framework (NPPF) to be addressed in the local plan
- Identifies and establishes the strategic cross boundary issues relevant to the Borough and its Local Plan upon which there has been, and will continue to be, engagement with the Duty to Co-operate bodies.
- Identifies the authorities/bodies to engage with for each strategic cross boundary issue
- Provides an overview of the engagement to date

2 Defining Duty to Cooperate Bodies

The following section identifies with the whom the Council will seek to co-operate with on strategic matters/cross boundary issues and some of the mechanisms that may be engaged.

2.1 Local Planning Authorities

Whilst the DTC is not prescriptive, planning guidance states that co-operation between local planning authorities should produce effective and deliverable policies on strategic cross boundary matters.

The Districts and Boroughs including higher tier local authorities, that either border Epsom & Ewell or are considered to potentially share strategic cross-boundary issues and should be engaged with as part include:

- Elmbridge Borough Council
- London Borough of Sutton
- Mole Valley District Council
- Reigate and Banstead Borough Council
- Royal Borough of Kingston upon Thames (London Borough)
- Surrey County Council
- The Greater London Authority / Mayor of London

Not all direct neighbouring authorities will be affected by the same cross boundary issues. furthermore, it is possible that as the Local Plan progresses, additional bodies may need to be engaged with on certain strategic matters. Accordingly, this list will be subject to regular review.

2.2 Prescribed Bodies

Planning Policy Guidance requires local authorities to co-operate with a number of prescribed national bodies / organisation as per the Localism Act¹. They include the following bodies who are, themselves, subject to the DTC:

- The Environment Agency
- Historic England
- Natural England
- The Mayor of London
- The Civil Aviation Authority
- Homes England
- Clinical Commissioning Groups (CCGs)
- The National Health Service Commissioning Board (NHS)
- The Office of Road and Rail
- Highways Authority (Surrey County Council Highways)
- Transport for London

¹ Localism Act (2011) Section 33A (1) (c)

In addition, EEBC is required to co-operate with the Local Enterprise Partnership (for EEBC, this is the Coast to Capital LEP) and the Local Nature Partnership (Surrey LNP).

2.3 Existing mechanisms

EEBC has a strong history of engagement and partnerships working with other authorities, stakeholders and public bodies. It is presently involved with several working groups and partnerships, some of which were established before the formal DTC came into existence through the Localism Act 2011. These are listed below. It should be noted that some of the groups provide a forum for sharing information rather than the discussion of strategic cross boundary issues.

- **The Surrey Planning Officers Association (SPOA)**
SPOA comprises the Heads of Planning service from the eleven Surrey district and boroughs and Surrey County Council.
- **Surrey Planning Working Group (PWG)**
PWG is made up of the leading policy planning officers from all eleven district councils and the County Council. The group reports to SPOA and provides a forum for information sharing and discussion on technical matters relating to planning policy development in the context of national, strategic and local priorities. The group provides a forum through which strategic and cross boundary issues can be raised in relation to the DTC and taken forward to more senior groups where necessary.
- **Surrey Leaders Group**
The Surrey Leaders' group is formed of the Leaders of the eleven Surrey local authorities. It provides a political forum where strategic issues can be discussed.
- **Joint Place Team arrangements between Surrey CC & EEBC**
Regular meetings are held to discuss a variety of planning related issues
- **Surrey Futures Steering Board, including working groups to deliver the Surrey 2050 Place Ambition (specifically the Epsom-Leatherhead Strategic Opportunity Area)**
Surrey Future brings together Surrey's local authorities and business leaders to agree the investment priorities to support the county's economy. The Steering Board which oversees Surrey Futures, launched 'Surrey's 2050 Place Ambition' in 2019 to facilitate good growth. This includes eight 'strategic opportunity areas' one of which is the Epsom to Leatherhead corridor.
- **Surrey Greener Futures Partnership Steering Group**

Steering group made up of Members & Directors/Heads of Service from Surrey County Council and Borough Councils. The Group will help to steer the development and delivery of the Greener Futures Climate Change Delivery Plan and other Greener Futures objectives and will feed into the Greener Futures Board.

- **Climate Change Officer Working Group**
Officers involved in climate change and sustainability from the eleven Surrey local authorities and the County Council. Acts as a forum for sharing information, initiatives and project work relating to the delivery of the climate change goals set by the Borough and County.
- **Surrey Flood Risk Partnership Board & Working Group**
A group of representatives from a number of organisations and authorities that have responsibilities or interests regarding flood risk in Surrey. The Board and its associated operational Working Group aim to coordinate flood risk management activities across the county, oversee cross-authority work and deliver the Surrey Flood Risk Management Strategy.
- **Gatwick Diamond Initiative Officers Group**
- **Gatwick Diamond Strategic Project Group**
The Gatwick Diamond Initiative is a business-led partnership, which focuses on strategic issues. The initiative forms part of the Coast to Capital Local Economic Partnership. The aim of the initiative is to grow the region's existing jobs base, attract new jobs and secure investments.
- **Surrey Economic Development Officers Group**
- **East Surrey Economic Development Officers Group**
A group where economic development officers/representatives from across Surrey meet to discuss strategic issues. East Surrey group is a sub-group of the wider Surrey Group.

2.4 Responding to Duty to Cooperate Requests

EEBC will respond to and engage with other authorities and bodies where they request this. To this end the Council will:

- Respond positively to requests from other authorities and bodies for engagement on matters which have been identified as likely to affect the Borough, its interest or the wider geographical area;
- Attend and contribute towards duty to co-operate meetings or events at Officer and where necessary Member level which are organised by other authorities/ bodies on matters which have been identified as being of relevant cross boundary significance;

- Consider requests for joint evidence studies and where appropriate agree joint approaches to strategic matters where this will achieve sustainable development; and
- Respond in a timely manner to authority consultations and respond positively where joint working between the Council and other authorities has facilitated agreement or joint approaches under the duty to co-operate.

3 Strategic Matters to be addressed within a Local Plan

A local plan must include strategic policies to address priorities for development and the use of land. The NPPF offers guidance on strategic policies in paragraph 20. It identifies that strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

- housing (including affordable housing), employment, retail, leisure and other commercial development;
- infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- community facilities (such as health, education and cultural infrastructure); and
- conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

It is not a given however that all the above require a SoCG and extensive cooperation. Rather, the PPG says that whilst co-operating, organisations should work together at the outset of plan-making to identify cross boundary matters which need addressing. (Paragraph: 015 Reference ID: 61-007-20180913). The Council has identified in this draft framework what it considers to be the strategic cross boundary issues where cooperation and engagement will be needed.

4 Identified strategic cross boundary issues, relevant DTC bodies and method of engagement.

The following section sets out the strategic cross boundary issues which will be addressed in EEBCs local plan. It provides a snapshot of the current issues which have been identified and the current position/situation. This section should be viewed as a 'live' document, which will be updated as the local plan evolves.

STRATEGIC CROSS BOUNDARY MATTER

4.1 Meeting identified housing needs within the borough and wider unmet housing needs

Overview of issue

Evidence to date suggests that EEBC will find meeting its housing needs, as identified by the government's standard method, extremely challenging. This is an issue faced by many of our neighbouring authorities and those across Surrey. Appendix 1 contains a table to show the current position (April 2022) of local planning authorities in Surrey and those adjoining EEBC.

Background

As previously required by the NPPF, EEBC prepared a Strategic Housing Market Assessment (SHMA) (2016) in partnership with those authorities within its housing market area (HMA)². This identified a significant uplift in housing need across the HMA, particularly for affordable homes. The need for EEBC was identified as 418 new dwellings per annum (dpa). For context, the currently adopted Core Strategy (2007) contains a housing target of 181 dpa.

In 2017 the government introduced the 'standard method' for calculating housing need. This method increased the figure further with the need identified for EEBC being 576 dpa (as at April 2022).

EEBC has been gathering evidence to identify how to sustainably accommodate this significantly increased housing need. To date it has prepared a Strategic Housing Land Availability Assessment (SHLAA) (2017), Urban Housing Capacity Study (2018), Green Belt Study (2017 to 2019) and a Constraints Study (2017). This evidence suggests that the potential land available to accommodate new housing falls significantly short of what is needed to meet the needs identified from the standard method. To ensure the most up to date information is available in terms of land availability for housing EEBC is producing a new Land Availability

² Authorities within EEBC's HMA included Mole Valley District Council, Elmbridge Borough Council and the Royal borough of Kingston Upon Thames.

Assessment (LAA) which will include revisiting the methodology and the constraints to development assumed and Housing and Economic Needs Assessment (HEDNA). The Council has been and will continue to work with its partners to identify how best housing needs can be accommodated sustainably, through consulting on evidence base methodology, DTC meetings and responding to formal consultations/requests.

PARTNERS AND CONSIDERATIONS

Partners include adjoining local authorities, those within the HMA, other local authorities within Surrey, Surrey County Council and the Greater London Authority

Adjacent Local Authorities

Mole Valley District Council (MVDC)

MVDC shares a boundary and is within the same HMA as EEBC. MVDC submitted their local plan for examination in February 2022, which makes provision for approximately 77% of their housing need. There is therefore a shortfall of approximately 1,700 dwellings over the plan period 2020 to 2037. EEBC and MVDC have signed a Statement of Common Ground (2021), which established that neither authority were in a position to accommodate each other's unmet needs.

Reigate & Banstead Borough Council (RBBC)

RBBC is a neighbouring Surrey authority. RBBC adopted their local plan in 2014 which was reviewed in 2019. To date, neither RBBC or EEBC have made formal requests to each other for assistance in meeting housing needs.

Royal Borough of Kingston upon Thames (RBK)

RBK is a greater London authority. It shares a boundary with EEBC and is within the same HMA. RBK's housing target is identified in the London Plan 2021, which requires the delivery of 964 homes a year. Following the earlier publication of the draft London Plan, which initially gave RBK a target of delivering 1,364 new homes per annum, RBK wrote to EEBC (February 2018) to state that they were not in a position to meet any of the SHMA partners' housing need for the foreseeable future. A request was made to the SHMA partners to assist in meeting some of RBK's housing need.

London Borough of Sutton (LBS)

LBS is a greater London authority and shares a boundary with EEBC. The LBS adopted a Local Plan in 2018. The London Plan 2021 identifies a target of 469 dpa compared to the 427 dpa provided for in the local plan. No requests have been received from or made to LBS in terms of assisting with meeting housing needs.

Authorities within the HMA

Elmbridge Borough Council (EBC)

EBC are within the same HMA as EEBC and are due to consult on their Regulation 19 Local Plan imminently. They have identified a shortfall in meeting their housing need of approximately 25% or 2,360 dwellings (as at October 2021). This position has evolved throughout the production of their local plan and EEBC has always indicated that meeting its own need would be challenging and as such it was unlikely to be able to meet any external unmet need.

Wider Surrey Authorities

Guildford Borough Council (GBC)
Runnymede Borough Council (RBC)
Spelthorne Borough Council (SBC)
Surrey Heath Borough Council (SHBC)
Tandridge District Council (TDC)
Waverley Borough Council (WavBC)
Woking Borough Council (WokBC)

Other Authorities**Surrey County Council (SCC)**

SCC has responsibility for adult social care and as such, has an interest in the type and amount of care accommodation delivered within the Borough. EEBC will engage with SCC on the gathering of evidence on housing needs, particularly the HEDNA.

Greater London Authority (GLA)

The London Plan 2021 identifies the housing targets for each London Borough. It is stated³ that Greater London is considered as a single HMA and it does not identify any surplus capacity to accommodate unmet housing need outside Greater London.

Requests from Other Authorities

Requests received to help meet unmet housing needs from:

- Mole Valley District Council (SoCG July 2021)
- Elmbridge Borough Council (Letter October 2021)
- Royal Borough of Kingston Upon Thames (Letter February 2018)

In responding to these requests, it has been stated that EEBC's evidence suggests the Borough may not be able to meet its own housing need figure and is therefore unlikely to be able to assist in meeting another authority's needs. This situation will be reviewed as additional Local Plan evidence is gathered.

³ Paragraph 4.1.2

Authorities Engaged

Elmbridge Borough Council
Mole Valley District Council
Royal Borough of Kingston Upon Thames
London Borough of Sutton
Surrey County Council

Bodies Engaged

Mechanism for Engagement

Consult partners on the preparation and drafts of key evidence base documents in relation to housing

Respond to partners consultation on key evidence base documents in relation to housing

Discussions with local authorities at officer and member level with a view to entering agreements prior to proposed submission of the Local Plan

Formal Local Plan consultations: Regulation 18 and 19

STRATEGIC CROSS BOUNDARY MATTER

4.2 Meeting the identified need for Gypsy and Traveller accommodation within the borough and wider unmet needs

Overview of issue

EBBCs draft Gypsy and Traveller Accommodation Assessment (GTAA) 2022 has identified a need for 9 additional pitches for households that meet the planning definition⁴ over the period 2022 to 2037. This need is set out in the table below by year periods.

Years	0-5	6-10	11-15	Total
	2022-27	2027-32	2032-37	
	6	1	2	9

⁴ The planning definition for a Gypsy, traveller or Travelling Showperson is set out in Planning Policy for Traveller Sites (PPTS) 2015

There is also an identified need for 8 pitches for households that did not meet the planning definition. There was no identified need for a formal transit site.

Previously there was no identified need for additional pitch provision within the Borough. While EEBC will seek to accommodate this need within the Borough in the first instance, given its constrained nature, it is likely that further cooperation with neighbouring authorities will be required to ensure the need is met. Additional evidence gathering, in the form of the LAA, will further inform this situation.

The Borough currently has two public Gypsy and Traveller sites; Kiln Lane and Greenlands, Cox Lane. The Kiln Lane site is located within a wider site that EEBC are considering for development opportunities. This could result in the displacement of the Gypsy and Traveller site, which would need to be re-provided in addition to meeting the identified future need. The likelihood for this to occur will become clearer as the potential for redevelopment of the wider site is investigated but it is being highlighted as an issue that may require cooperation with our neighbouring authorities.

PARTNERS AND CONSIDERATIONS

Partners include adjoining local authorities, those within the HMA, other local authorities within Surrey and Surrey County Council.

Adjacent Local Authorities

Mole Valley District Council (MVDC)

EEBC and MVDC have signed a Statement of Common Ground (2021), where both parties agreed to seek to meet their own need for additional Gypsy and Traveller pitch provision. This was prior to the 2022 GTAA. A MVDC officer was interviewed as part of the GTAA to ascertain their position in terms of overall accommodation need in Mole Valley and to identify any cross-border issues. No cross-boundary issues were identified by Mole Valley.

Reigate & Banstead Borough Council (RBBC)

RBBC have adopted a Development Management Plan which includes allocations for Gypsy and Traveller pitches and for Travelling Showperson plots. No specific issues were raised by the officer interviewed for the GTAA in terms of cross boundary issues with EEBC.

Royal Borough of Kingston upon Thames (RBK)

The RBK officer interviewed for the GTAA identified that current provision does not meet the needs of travellers living in the Borough of Kingston. This issue will be addressed as part of the local plan. No specific cross boundary issues were identified in relation to the gypsy and traveller community and EEBC.

London Borough of Sutton (LBS)

Input from the LBS was sought as part of the GTAA. No cross-boundary issues were identified by the LBS officer who was interviewed. The LBS will reassess their gypsy and traveller need as part of the local plan review, which, as of January 2022, is currently underway.

Authorities within the HMA**Elmbridge Borough Council (EBC)**

EBC are within the same HMA as EEBC and are due to consult on their Regulation 19 Local Plan imminently. They have identified a shortfall in meeting their housing need of approximately 25% or 2,360 dwellings (as at October 2021). This position has evolved throughout the production of their local plan and EEBC has always indicated that meeting its own need would be challenging and as such it was unlikely to be able to meet any external unmet need.

Wider Surrey Authorities

Guildford Borough Council (GBC)
Runnymede Borough Council (RBC)
Spelthorne Borough Council (SBC)
Surrey Heath Borough Council (SHBC)
Tandridge District Council (TDC)
Waverley Borough Council (WavBC)
Woking Borough Council (WokBC)

Other Authorities**Surrey County Council (SCC)**

SCC have been working with the Boroughs and Districts to address transit provision at the county level. A transit site within Tandridge is currently being progressed through the planning system. While EEBC do not currently appear to have any transit provision needs, it will be important to remain informed and this specific issue.

Requests from Other Authorities

No specific requests have been received from other authorities in relation to Gypsy and Traveller provision

Authorities Engaged

Elmbridge Borough Council
Mole Valley District Council
Royal Borough of Kingston Upon Thames
London Borough of Sutton
All were engaged as part of the EEBC GTAA

Bodies Engaged
<p>Mechanism for Engagement</p> <p>Contact via the consultants preparing the GTAA</p> <p>Discussions with local authorities at officer and member level with a view to entering agreements prior to proposed submission of the Local Plan</p> <p>Formal Local Plan consultations: Regulation 18 and 19</p>

<p>STRATEGIC CROSS BOUNDARY MATTER</p> <p>4.3 Meeting economic development needs: Addressing the impact of the potential redevelopment of industrial land.</p>
<p>Overview of issue</p> <p>EEBC is exploring options to assist in meeting its housing need. One option is the potential redevelopment of the Kiln Lane and Longmead industrial estates, which could result in the displacement of employment uses. Currently this option is at an early stage of consideration, but its impact on the wider economy will need to be explored with partners to understand whether redevelopment for a housing led scheme is a realistic prospect.</p> <p>Background</p> <p>The Borough has a significant need for new housing, although evidence currently shows that there are limited sites available for new development. EEBC is therefore considering various options in seeking to meet identified needs, including the potential redevelopment of the Kiln Lane and Longmead industrial estates for a mix of uses. This could result in the displacement of employment uses, which will impact on the wider economy. Cooperation with partners will be required to ensure that if the identified needs of the economy cannot be met within Borough, they can be accommodated across neighbouring authorities but if not, how that will impact on EEBC's potential housing supply.</p> <p>The Council is commissioning a Housing and Economic Needs Assessment (HEDNA) to enhance understanding of the current provision and future needs for economic floorspace, which will further inform this issue.</p>
<p>PARTNERS AND CONSIDERATIONS</p> <p>Partners include adjoining local authorities, Surrey County Council, and the Coast to Capital Local Enterprise Partnership (LEP)</p>

Adjacent Local Authorities

EEBC will share information with neighbouring authorities where relevant.

Mole Valley District Council (MVDC)**Reigate & Banstead Borough Council (RBBC)****Royal Borough of Kingston upon Thames (RBK)****London Borough of Sutton (LBS)****Other Authorities****Surrey County Council (SCC)**

SCC is working with EEBC and MVDC on the Surrey 2050 Place Ambition, which includes the SOA: Epsom – Leatherhead Corridor. The impact of the potential redevelopment of the industrial estates will need to be considered in relation to the SOA.

Coast to Capital (C2C)

The potential impact on the local and wider economy should be explored with the LEP, given their strategic role.

Authorities Engaged

None as yet. Authorities will be engaged as further information becomes available.

Bodies Engaged**Mechanism for Engagement**

At this stage, discussions with local authorities at officer and member level to be informed by evidence gathering.

STRATEGIC CROSS BOUNDARY MATTER**4.4 Supporting the local economy: the horse racing industry****Overview of issue**

To support the local racehorse training industry, through the local plan.

Background

Horse racing plays an important role in our local economy and the Borough is an established location for the racehorse training industry. The industry is

concentrated to the south of the Borough within the Green Belt and there are a number of gallops on Walton and Epsom Downs. EEBC is supportive of local racehorse training industry and aware of the challenges it faces, particularly from the loss of facilities to other uses.

PARTNERS AND CONSIDERATIONS

Mole Valley District Council (MVDC)

The horse racing industry is a significant employer in north-eastern Mole Valley, with numerous training facilities being located within the district, making use of the gallops within EEBC. MVDC are also supportive of this industry and EEBC signed a SoCG with MVDC to agree that both Councils “will work with the Jockey Club and Jockey Club Estates to ensure that racehorse training in Epsom & Ewell and Mole Valley has the conditions to thrive.” EEBC will also consider the merits of extending MVDC’s new Racehorse Training Zone, a designation within which horse racing stables and gallops are safeguarded, into the Borough.

The Jockey Club and Jockey Club Estates

The Jockey Club owns Epsom Downs Racecourse and the Jockey Club Estates is responsible for the management and maintenance of the racehorse training grounds at Epsom.

Authorities Engaged

Mole Valley District Council

Bodies Engaged

Mechanism for Engagement

Consult partners on the preparation and drafts of policies related to the local economy and horse racing industry.

Formal Local Plan consultations: Regulation 18 and 19

STRATEGIC CROSS BOUNDARY MATTER

4.5 Flood risk (principally from surface water)

Overview of issue

The main cause of flood risk in the Borough is from surface water flooding. This mainly occurs during intense or prolonged rainfall and is a result of the inability of the sewer network to cope, surface runoff from the chalk in the south of the Borough on to the clay underlying the urbanised north of the borough and groundwater flooding from the chalk.

Background

The Council, along with partners responsible for addressing flood risk, produced a Surface Water Management Plan (SWMP) 2011 to identify specific areas of risk and potential mitigation measures. The 2018 Strategic Flood Risk Assessment (SFRA) used the modelling outputs from the SWMP to identify 'Epsom & Ewell Critical Drainage Areas' within the Borough, these being the areas which are most at risk from local flood sources (surface water, ground water and ordinary watercourses). Surrey County Council, as the Lead Local Flood Authority has formed a Surrey Flood Risk Partnership Board (which includes EEBC) to produce the Surrey Local Flood Risk Management Strategy 2017 – 2032.

PARTNERS AND CONSIDERATIONS

Reigate & Banstead Borough Council (RBBC)
Royal Borough of Kingston upon Thames (RBK)
London Borough of Sutton (LBS)
Surrey County Council (SCC) as the Lead Local Flood Authority: LLFA
Environment Agency (EA)
Thames Water (TW)
SES Water (SESW) specifically for groundwater flooding

Authorities Engaged

Surrey County Council (engaged as part of the SRFA 2017)

Bodies Engaged

Environment Agency (engaged as part of the SRFA 2017)
 Thames Water (engaged as part of the SRFA 2017)

Mechanism for Engagement

Surrey Flood Risk Partnership Board
 Contact via the consultants preparing the SFRA
 Engagement on sequential testing of site with the EA and SCC

STRATEGIC CROSS BOUNDARY MATTER

4.6 Improve sustainable transport choices, particularly in association with new development

Overview of issue

To secure opportunities, through new developments and other schemes/sources of funding, to deliver sustainable transport improvements.

Background

It is becoming increasingly apparent that the way that we choose to travel needs to evolve to respond to prominent issues such as our changing climate, deteriorating air quality and mounting congestion. Many areas of the Borough's existing highway network are at capacity and investment will need to be targeted towards delivering improved sustainable transport networks, while development sites will need to be well located in terms of access to facilities and services.

PARTNERS AND CONSIDERATIONS

Surrey County Council (SCC)

EEBC has been and will continue to work with SCC on a Transport Assessment to identify the accessibility of potential sites. Further transport assessments will be undertaken as the Local Plan evolves. SCC have produced their Local Transport Plan 4 (LTP4), which has been supported in principle by EEBC. Transport policies in the local plan are likely to be guided by LTP4 objectives. EEBC will work with SCC to help ensure sustainable transport measures are embedded into new developments and sustainable transport schemes are identified which may be funded/part funded by new developments.

Transport for London (TFL), Royal Borough of Kingston upon Thames (RBK) and London Borough of Sutton (LBS)

As the Borough is adjacent to Greater London, EEBC will seek to work with TFL, RBK and LBS, alongside SCC to ensure sustainable transport opportunities can be maximised. For example there are a number of TFL bus routes which extend into the Borough. The delay of Cross Rail 2 will have implications for the Borough.

Network Rail (NR), South Western Railways (SWR) and Southern Railways (SR)

Authorities Engaged

Surrey County Council (engaged as part of the Transport Assessment including site accessibility)

Bodies Engaged

Mechanism for Engagement

Via evidence base studies, such as Transport Assessments.

Engagement on the Infrastructure Delivery Plan

Formal Local Plan consultations: Regulation 18 and 19

STRATEGIC CROSS BOUNDARY MATTER

4.7 Meeting education needs.

Overview of issue

The Borough's considerable housing need, as identified through the government's standard method, is likely to generate additional demand for school places throughout the local plan period. EEBC will work closely with Surrey County Council and adjoining local authorities to ensure future educational needs can be adequately met.

Background

Surrey County Council has a statutory duty to ensure there are sufficient school places in the county to meet present and future demand. The County produces a 10-year School Organisation Plan, the most recent of which covers the period 2020-2030. For Epsom & Ewell, this identifies that for primary schools within the Borough any exceptional demand will stem from new housing or unexpected migration. For secondary schools the strategy is to fill existing vacant capacity before seeking to commission any additional provision. The proximity of some schools to the Borough's boundaries means that there is more cross border movement both inward and outward.

PARTNERS AND CONSIDERATIONS

Partners include Surrey County Council and adjoining local authorities. EEBC will share information with partners as the local plan evolves.

Surrey County Council (SCC)

EEBC regularly provides housing trajectory information to SCC to inform school place planning forecasts. As the local plan evolves EEBC will work with SCC to identify the impact potential allocations could have on education provision within the Borough and across its boundaries, and how this may be addressed.

Adjacent Local Authorities

Mole Valley District Council (MVDC)

EEBC and MVDC have signed a Statement of Common Ground (2021), which established that there are significant linkages between the authorities in terms of education provision.

Reigate & Banstead Borough Council (RBBC)

Royal Borough of Kingston upon Thames (RBK)

London Borough of Sutton (LBS)

Sutton have an adopted Local Plan (2018) which identifies the need for two new secondary schools and three new primaries. The plan allocates / safeguards sites to meet this need. To date a new secondary has opened on the hospital cancer hub site and a second has received permission on appeal, to be built at Rosehill Recreation Ground.

Authorities Engaged

Surrey County Council
Mole Valley District Council

Bodies Engaged

Mechanism for Engagement

Discussions with local authorities at officer and member level as the local plan evolves

Engagement on the Infrastructure Delivery Plan

Formal Local Plan consultations: Regulation 18 and 19

STRATEGIC CROSS BOUNDARY MATTER

4.8 Meeting healthcare needs.

Overview of issue

The Borough's considerable housing need, as identified through the government's standard method, is likely to generate additional demand for healthcare provision. EEBC will work closely with the Surrey Heartlands Clinical Commissioning Group (CCG) and adjoining local authorities to ensure healthcare needs can be adequately met.

Background

The Borough falls under the Surrey Heartlands Health & Care Partnership (an Integrated Care System), which is a partnership of health organisations, local authorities and others. The Surrey Heartlands CCG is part of this Integrated Care System. Surrey Heartlands CCG has responsibility for Estate development and planning for community and primary care since April 2017. There are a number of Primary Care Networks across the Surrey Heartland area and the Borough is located in the Surrey Downs Integrated Care Partnership.

PARTNERS AND CONSIDERATIONS

Surrey Heartlands Clinical Commissioning Group (CCG)

EEBC has previously engaged with the CCG on early drafts of the Infrastructure Delivery Plan. This will continue as the local plan evolves.

Surrey County Council (SCC)

SCC is responsible for a number of Public Health functions which aim to improve and protect the health of people living and working in Surrey.

Adjacent Local Authorities

EEBC will share information with neighbouring authorities as the local plan evolves

Mole Valley District Council (MVDC)

EEBC and MVDC have signed a Statement of Common Ground (2021), which established that there are significant linkages between the authorities in terms of healthcare provision. It was agreed to continue discussions with the CCG and the Surrey Downs Integrated Care Partnership. MVDC are

allocating sites for enhanced healthcare provision in both Ashted and Leatherhead.

Reigate & Banstead Borough Council (RBBC)

Royal Borough of Kingston upon Thames (RBK)

London Borough of Sutton (LBS)

Authorities Engaged

Mole Valley District Council

Bodies Engaged

Surrey Heartland CCG

Mechanism for Engagement

Engagement on the Infrastructure Delivery Plan to identify healthcare infrastructure needs

Formal Local Plan consultations: Regulation 18 and 19

Appendix 1: Local Planning Authorities position in relation to Local Plan preparation and housing need.

LPA	Status of Local Plan	Current adopted housing target (dpa)	Standard Method Housing Need (dpa)	Level of unmet need against standard method
Epsom & Ewell Borough Council	Reg 18 consultation due November 2022	181 Core Strategy (2007)	576	Unknown
Mole Valley District Council	Submitted for examination Feb 2022. Local Plan period 17 years.	188 Core Strategy (2009)	456	Submitted Local Plan aims to deliver 353 dpa or 6,000 over the plan period. Shortfall: 1,700 dwellings
Reigate & Banstead Borough Council	Not currently preparing a new Local Plan	460 Core Strategy (2014) reviewed 2019	644	Unknown.
London Borough of Sutton	Local Plan adopted 2018	427	807	Unknown. The London Plan (2021) identifies a target of 469 dpa
Royal Borough of Kingston Upon Thames	Further Reg 18 consultation to be undertaken	964 London Plan (2021)	2037	Unknown. The London Plan (2021) identifies a higher target in comparison to the previous 2016 London Plan which was 643 dpa

Elmbridge Borough Council	Regulation 19 consultation to commence shortly	225 Core Strategy (2011)	641	Approximately 25% of need. Figure of 2,360 estimated by EBC October 21
Guildford Borough Council	Local Plan: Strategy and sites adopted 2019	562	776	Recent adoption of Local Plan; potential for unmet need given the higher standard method figure
Runnymede Borough Council	Local Plan adopted 2020	500	533	Review of Local Plan commenced 2021. Unknown if any unmet needs at this time.
Spelthorne Borough Council	Regulation 19 consultation expected Spring 2022	166 Core Strategy (2009)	611	Unknown
Tandridge District Council	Submitted for examination Jan. 2019	125 Core Strategy (2008)	644	Submitted plan seeks to provide 303 dpa. Over 50% unmet need.
Waverley Borough Council	Local Plan adopted 2018	590	703	Adopted plan met identified needs at the time and 50% of Woking's unmet needs (83 dpa).
Woking Borough Council	Not currently preparing a new Local Plan	292 Core Strategy (2012)	429	Unknown

Duty To Cooperate Framework: Table of Issues

Duty to Co-operate Partners/Strategic Cross Boundary Matters

DTC Partner	Strategic Cross Boundary Matter							
	Housing needs	Gypsy & Traveller needs	Economic development needs	Local horse racing industry	Flood risk (primarily from surface water)	Improve sustainable transport choices	Education needs	Healthcare needs
Mole Valley DC	X	X	X	X			X	X
Reigate & Banstead BC	X	X	X		X		X	X
RB Kingston upon Thames	X	X	X		X	X	X	X
LB Sutton	X	X	X		X	X	X	X
Elmbridge BC	X	X						
Guildford BC	X	X						
Runnymede BC	X	X						
Spelthorne BC	X	X						
Surrey Heath BC	X	X						
Tandridge DC	X	X						
Waverley BC	X	X						
Woking BC	X	X						
Surrey County Council	X	X	X		X	X	X	X
Greater London Authority	X							
Coast to Capital			X					
The Jockey Club & Jockey Club Estates				X				

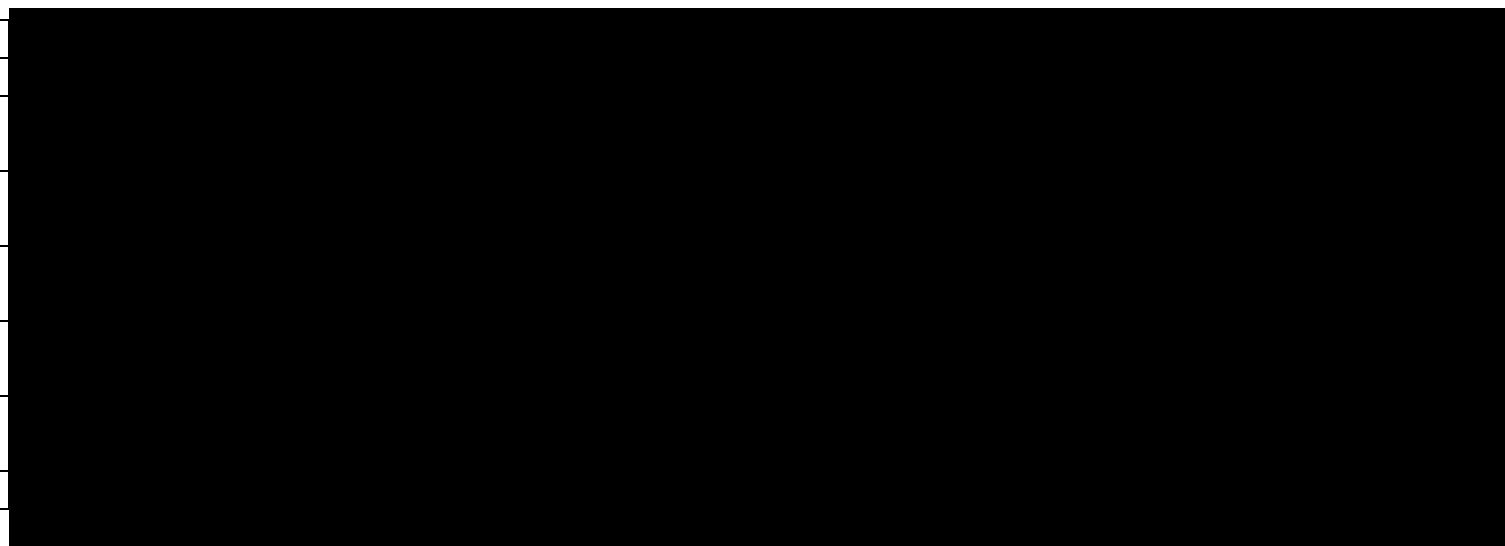
Environment Agency					X			
Thames Water					X			
SES Water					X			
Transport for London						X		
Network Rail						X		
South Western Railways						X		
Southern Railways						X		
Surrey Heartlands CCG								X

Email Addresses:

DTC Partner	Email address
Mole Valley DC	
Reigate & Banstead BC	
RB Kingston upon Thames	
LB Sutton	
Elmbridge BC	
Guildford BC	
Runnymede BC	
Spelthorne BC	
Surrey Heath BC	
Tandridge DC	

Waverley BC
Woking BC
Surrey County Council
Greater London Authority
Coast to Capital
The Jockey Club & Jockey Club Estates
Environment Agency
Thames Water
SES Water
Transport for London
Network Rail
South Western Railways
Southern Railways
Surrey Downs CCG
Surrey Heartlands CCG
Other DTC prescribed bodies not listed above
Historic England

Natural England
Mayor of London
The Civil Aviation Authority
Homes England
NHS Commissioning Board
The Office of Rail and Road
Surrey Local Nature Partnership



Consultation email sent to those listed above 25/5/22 requesting response by Friday 17 June. See folder for example of consultation email.

Duty To Cooperate Framework: Consultation email example

From: [REDACTED]
Sent: 25 May 2022 13:22
To: [REDACTED]
Cc: [REDACTED]
Subject: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework
Attachments: Consultation Draft DTC framework May 22.pdf
Categories: Egress Switch: Unprotected

Dear Mole Valley District Council

Epsom & Ewell Borough Council (EEBC) are currently preparing a Duty to Co-operate Framework (attached). This seeks to identify the strategic cross boundary issues that will be addressed in the local plan, which require co-operation with partners.

To ensure the relevant issues /organisations to co-operate with are identified, we are consulting with our duty to co-operate partners to seek their input into the process.

For Mole Valley, we have identified the following specific issues that will need co-operation:

- Housing needs
- Gypsy & Traveller accommodation needs
- Economic development needs
- Local horse racing industry
- Education needs
- Healthcare needs

Further detail on these can be located in Section 4 of the attached framework, page 7.

I would welcome your comments on:

- Whether all the relevant strategic issues that require co-operation have been identified in the Framework.
- Whether the specific issues identified for co-operation with you are relevant.
- Any wider comments on the document.

A response would be appreciated by Friday 17 June. Please let me know if you wish to discuss anything further on this or if you require additional time to respond. We will also be consulting on our Land Availability Assessment (LAA) methodology in the next couple of weeks.

Kind regards

[REDACTED]
Principal Policy Officer
Epsom & Ewell Borough Council
Tel: [REDACTED]
Working days: Part time hours across Monday to Wednesday

Duty To Cooperate Framework: Consultation Response Summary

Duty to Co-operate Framework: Consultation response summary

Organisation	Identification of relevant strategic issues	Wider comments	Changes to be made to the Framework
Natural England	Confirmed that the key strategic issues which Natural England would wish to be involved in discussions have been correctly identified, recognising that several other strategic issues are likely to influence this topic.	Request to be consulted on issues relating to the conservation and enhancement of the natural environment as highlighted to be included in the Local Plan.	
Guildford BC	Agree that housing needs is a strategic issue as we sit in neighbouring HMAs. Agree that gypsy & traveller accommodation needs has the potential to have cross boundary impacts.		
Surrey CC	Suggest the inclusion of the topic of biodiversity. SCC has been notified, on a provisional basis, that it will be the responsible body for a county wide Local Nature Recovery Strategy (LNRS). Also suggest a broader heading of infrastructure would be appropriate; this would include education, including SEND provision, but would extend to other areas such as waste infrastructure and community facilities such as libraries. Also suggest that Minerals & Waste and Heritage should be included as topics given the County's responsibilities in this area.	An update to the School Organisational Plan is imminent & SCC will notify us when this is published. Appendix 1: Spelthorne's reg 19 consultation is imminent and not currently referenced. Additional suggested text changes: The wording at the second paragraph of 2.1 could be amended to read: The local authorities, including higher tier local authorities, that either border.... and the wording relating to Surrey Future on page 3 could be amended to read: Surrey Future Steering Board, including working groups to deliver the Surrey 2050 Place Ambition (specifically the Epsom-Leatherhead Strategic Opportunity Area) The Surrey Future partnership, which includes Surrey's district and borough councils, Surrey County Council, the Coast to Capital and Enterprise M3 Local Enterprise Partnerships, Gatwick Diamond Business and the Surrey Nature Partnership has produced Surrey's 2050 Place Ambition, a non-statutory, strategic spatial investment	Make suggested text changes. Include SEND provision under education matter. Make reference to the additional topic areas suggested (biodiversity, minerals and waste, heritage) and state that they will be included should specific issues be identified for any of these.

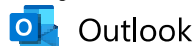
		framework for the county. It presents what Surrey's strategic partners want to collectively achieve in terms of "good growth". The document includes eight 'strategic opportunity areas' one of which is the Epsom to Leatherhead corridor.	
Runnymede BC	Agree with the areas of co-operation identified.		
Historic England	there do not appear to be any strategic matters within the document that would directly affect heritage assets and that would require a formal statement of common ground with Historic England.	Note cross boundary housing sites are also identified as a major issue. If any of these would involve or otherwise affect a nationally designated heritage asset, then Historic England should be involved.	
London Borough of Sutton	Think everything is covered	No specific comments	
Environment Agency	Agree that it is likely that surface water is the primary source of flood risk, but consider that the as the majority of the Upper Hogsmill and its tributaries are within the EBC boundary, there are a number of properties, both residential and commercial, that are predicted to be at risk of flooding from the river.	Specifically interested in: flood risk (all sources), catchment management, waste management (movement of waste from arising to treatment/disposal), water & waste water infrastructure through water cycle studies, green infrastructure inc green corridors, infrastructure delivery plans. Planning for biodiversity in the local plan requires continuity and consistency across neighbouring council boundaries. Cross boundary working should form part of work under the DtC. Water resource planning does not follow local authority boundaries. Planning for water resources and water supply in local plans should reflect the plans of neighbouring councils and water company resource zones. Cross boundary working should form part of work under the DtC.	Mention fluvial flood risk in the document. Make reference to the additional topic areas of biodiversity, water resources, water quality. Include if specific issues are identified.
The Jockey Club	Agree	Suggest a couple of amendments: Overview of the issue – change from "To support the local racehorse training industry, through the local plan" to "To support the	Amend doc as suggested.

		<p>local horseracing industry, including the racecourse and racehorse training, through the local plan”.</p> <p>Jockey Club Racecourses and Jockey Club Estates - it states that The Jockey Club owns Epsom Downs Racecourse and the Jockey Club Estates is responsible for the management and maintenance of the racehorse training grounds at Epsom, but it should be amended to “The Jockey Club owns Epsom Downs Racecourse and Training Grounds, and is responsible for the operation of the racecourse and the management and maintenance of the racehorse training grounds at Epsom”.</p>	
Tandridge DC	Broadly agree	<p>In relation to the planning application for a gypsy & traveller transit site, Surrey County Council's planning application has been withdrawn. Confirmed that their submitted Local Plan remains in active examination. If found sound a 5 year housing land supply can be demonstrated.</p>	Amend document to reflect comments.
Waverley BC		Agree. No comments.	
Reigate & Banstead		<p>Advised that, subject to member agreement, a review of the Core Strategy & DM Plan documents will be undertaken alongside starting work on a new local plan. At this stage RRBC officers will request a DTC meeting with EEBC. While R&B is currently maintaining a 5 year housing land supply, the Borough is heavily constrained and as such is unable to meet unmet housing need for Epsom & Ewell. Intend to ensure there are adequate employment premises available so as to ensure employment opportunities and not harm the local economy. In terms of education and health it is likely that proposals in Reigate and Horley would only have a very limited effect on residents in Epsom & Ewell.</p>	Amend document to reference current housing position in RBBC and education and health investment.

Thames Water	<p>Consideration also needs to be given to potential sewer flooding, sewage treatment and water supply and water treatment as both issues can be affected by development outside the borough and development within the borough can have impacts outside of the borough. However, in practice these issues can be addressed by working proactively with the council throughout the local plan and development management processes to ensure that there are suitable policies to enable phasing conditions to be used to ensure development is not occupied until any necessary upgrades to the water or sewerage networks are in place.</p>	<p>Provided a list of policies that TW would welcome to be included in the local plan.</p>	<p>Risk of sewer flooding is mentioned in the framework. Ensure Thames Water are consulted throughout the production of the local plan, in particular on the IDP.</p>
Elmbridge BC	<p>The strategic cross boundary issues are the same Elmbridge have identified.</p>	<p>Update page 9 and page 23 text relating to EBC. Most current housing trajectory in the LAA 2022 states there is an identified 30% shortfall or 2,918 dwellings as of 31 March 2022. Local housing need figure has also gone up (refer to para 3.58 in the LAA 2022.</p>	<p>Amend text to reflect latest housing position. Add the following text to the G&T section to reflect the published evidence base findings: EBCs GTAA and Gypsy, Roma and Traveller Site Assessment evidence base documents identify a need for 10 pitches over their plan period (2020 to 2036) as of March 2022. The documents suggest that 'alternative methods' will be used to address the level of identified need, such as additional touring caravan., shared static caravans, tourer</p>

			and dayrooms on existing sites. This situation will be re-evaluated in the next GTAA and local plan review.
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Duty To Cooperate Framework: Consultation Responses



RE: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

From: [REDACTED]

Date: Mon 2022-07-04 11:04

To: [REDACTED]

Cc: [REDACTED]

Dear [REDACTED]

I have read the DTC framework and think it is set out clearly. The strategic cross boundary issues you identify for Elmbridge are the same we have identified for Epsom and Ewell and are considered relevant for co-operation.

In terms of some additional comments,

You may wish to update page 9 and page 23- EBC text. The most current housing trajectory in the LAA 2022 states that we have identified a 30% shortfall or 2918 dwellings (with non-implementation discounts applied) as of 31 March 2022.

Our Local Housing need figure has also gone up- please see paragraph 3.58 in the [LAA 2022](#).

Page 12 repeats text from page 9- should it not say something about the results of our GTAA and Gypsy, Roma and Traveller site assessment? Both documents are available [online](#).

I hope this helps.

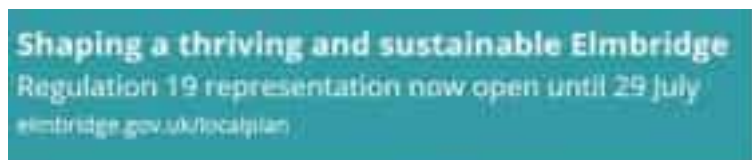
Kind Regards,

[REDACTED]

[REDACTED] | Principal Planning Policy Officer | Policy and Strategy

[REDACTED] [elmbridge.gov.uk](mailto:[REDACTED]@elmbridge.gov.uk)

Elmbridge Borough Council, Civic Centre, High Street, Esher, Surrey, KT10 9SD



From: [REDACTED]

Sent: 04 July 2022 09:24

To: [REDACTED]

Subject: RE: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

 External email >

Hi [REDACTED]

Yes, that's fine thanks. Hope all is going well with the consultation.

Thanks

From: [REDACTED]
Sent: 04 July 2022 09:18
To: [REDACTED]
Subject: RE: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

Dear [REDACTED]

Will you accept late comments on your DTC framework? I am hoping to look at it this week.

From: [REDACTED]
Sent: 24 June 2022 14:06
To: Planning Policy <PlanningPolicy@elmbridge.gov.uk>
Subject: FW: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

Dear EBC

I understand you are probably very busy with your Reg 19 consultation, but I would be grateful for a response to the consultation on our Duty to Co-operate as per my email below.

I'd be happy to talk this through over the phone if easier?

Many thanks

From: [REDACTED]
Sent: 25 May 2022 13:37
To: planningpolicy@elmbridge.gov.uk
Subject: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

Dear Elmbridge Borough Council

Epsom & Ewell Borough Council (EEBC) are currently preparing a Duty to Co-operate Framework (attached). This seeks to identify the strategic cross boundary issues that will be addressed in the local plan, which require co-operation with partners.

To ensure the relevant issues /organisations to co-operate with are identified, we are consulting with our duty to co-operate partners to seek their input into the process.

For Elmbridge, we have identified the following specific issues that will need co-operation:

- Housing needs
- Gypsy & Traveller accommodation needs

Further detail on these can be located in Section 4 of the attached framework, page 7.

I would welcome your comments on:

- Whether all the relevant strategic issues that require co-operation have been identified in the Framework.
- Whether the specific issues identified for co-operation with you are relevant.
- Any wider comments on the document.

A response would be appreciated by Friday 17 June. Please let me know if you wish to discuss anything further on this or if you require additional time to respond. We will also be consulting on our Land Availability Assessment (LAA) methodology in the next couple of weeks.

Kind regards

[REDACTED]
Principal Policy Officer

Epsom & Ewell Borough Council

Tel: [REDACTED]

Working days: Part time hours across Monday to Wednesday

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Epsom & Ewell Borough Council
Planning Services
Town Hall The Parade
Epsom, Surrey
KT18 5BY

Our ref: SL/2007/100648/OR-04/IS1

Your ref: email

Date: 17 June 2020

Dear [REDACTED]

Epsom and Ewell Local Plan - Duty To Co-operate Framework

Thank you for contacting the Environment Agency on the above. Our priorities to consider are:

- flood risk including surface water, fluvial and groundwater
- catchment management including River Basin Management actions
- climate change adaptation and resilience, in particular long term flood risk and water availability
- waste management- Waste may require co-operation beyond immediate administrative boundaries, reflecting the movement of waste from arising to treatment or disposal.
- water and waste water infrastructure for example through water cycle studies
- green infrastructure cross boundary initiatives including green corridors and green grids
- waterways plans where we are the navigation authority
- infrastructure delivery plans, or other cross boundary groups or strategies considering the delivery of infrastructure
- Flood risk and climate change are expected to increase the probability and consequences of flooding on people and property. The Local Plan can help to ensure that new developments are carefully located and designed to be resilient over their lifetime and help improve the sustainability of existing communities.

We would welcome a map illustrating the areas at risk of flooding across the borough. This should be regularly updated as new evidence and mapping is produced. For the most up to date maps and accurate environmental evidence we recommend using our Data Share service where you can access our environmental datasets and also datasets from Natural England, Forestry Commission and English Heritage. <https://environment.data.gov.uk/>.

We have provided more information below for your consideration. Please do not hesitate to contact me should you wish to discuss this further.

Yours sincerely,

[REDACTED]
Planning Specialist

Sustainable Places
Kent and South London
Direct e-mail [REDACTED]

Flood Risk

We welcome the inclusion of flood risk as a specific issue in the document. While in terms of numbers of properties and frequency it is likely that surface water is the primary source of risk in the borough and therefore understandable that this is the main focus of section 4.5, the majority of the Upper Hogsmill and its tributaries are within the Epsom and Ewell boundary. There are a number of properties, both residential and commercial, that are predicted to be at risk of flooding from the river.

The document correctly identifies that the bulk of the engagement between council and the Environment Agency would be through the planning process. It may be worth highlighting the value of engaging on sites at an early stage to identify how they can, where possible, provide maximum flood risk benefits and reduce flood risk both on site and elsewhere.

Section 4.3 of the document mentions the potential redevelopment of the Longmead industrial estate. This is an area close to the Green Lane stream and is within flood zone 3, predicted to be at high risk of flooding. While we appreciate that the focus of this specific objective is more on the economic impact we would like to take this opportunity to highlight, whether in this section or in 4.5, the potential benefits and avoidance of risk that could be realised through engagement on this site. Early engagement is required to both ensure the resilience of any new development and ensure risk is not increased off site, but also to maximise the potential flood risk benefits while realising the strategic objectives of the council

Flood risk does not follow local authority boundaries. Planning for flood risk management in the Local Plan should reflect the plans of neighbouring councils. Cross-boundary working should form part of work under the Duty to Co-operate. The provision of infrastructure for flood risk management is listed as one of the strategic priorities that should be considered in Local Plans.

The outcomes we want to see:

- Policies and allocations within the Local Plan ensure no inappropriate development is located in areas at high risk of flooding
- Local Plan ensure development in areas at risk of flooding will be safe without increasing flood risk elsewhere
- Local Plan contribute to reducing flood risk for existing communities
- The council identify the risk of flooding from all sources through their Strategic Flood Risk Assessment (SFRA) and under the Duty to Cooperate work to manage and resolve any cross-boundary risks
- Encourage the council to apply the sequential test and sequential approach to locating development through planning policies and the allocation of sites
- Check there is a strong policy directing inappropriate development away from flood zone
- Check whether or not SHLAA sites in flood risk areas have been included in the plan

The plan should identify what mitigation measures may be required to make a policy and/or allocation sustainable in relation to flood risk.

- We encourage the council to prepare policies and plans that require appropriate site layout and design techniques to allow for maintaining or improving the existing storage and flow of flood waters on site without increasing flood risk elsewhere.
- Check that a policy is included to ensure that new development does not detrimentally impact upon existing or proposed flood defence structures or systems.
- Check policies include guidance on what appropriately resilient and resistant means; and identify where safe access and egress is required to ensure safety of users and occupants. This would apply in both actual and residual risk situations
- We encourage the council to identify areas where there are particular surface water management issues and develop actions and policy approaches aimed at reducing these risks. Where appropriate, the council may wish to prepare a Surface Water Management Plan (SWMP).

Sequential and Exception Tests

These must be applied at the earliest possible stage of the planning process, in particular to the local plan and/or site allocation document. The council should be able to provide robust evidence that a sequential approach to growth and employment has been taken to steer development away from areas at risk from flooding. This evidence should be contained or summarised in the Strategic Flood Risk Assessment and/or Sustainability Appraisal and details may also be included in the policy document.

We may object to the draft Local Plan if there is no evidence that the sequential test and exceptions test has been applied. Any advice we provide to the council on the sequential test will be proportionate to the risk. Therefore we may:

- comment on the 'deliverability' of a site by setting out the risk and highlighting the challenges for development. This is particularly important if development of a site affects infrastructure such as flood or sea defences, flood water storage areas or if there will be ongoing partnership funding requirements.
- encourage the use of the existing technical and practice guidance or highlight good practice elsewhere
- express serious concerns if the draft Local Plan does not comply with the NPPF

Biodiversity

We encourage the restoration of rivers and streams to positively contribute to the Biodiversity plan, deliver the requirements of the Water Framework Directive, and provide linked corridors of habitat, promoted under the Habitats Directive.

Nature does not follow local authority boundaries. Planning for biodiversity in the Local Plan, including for networks and corridors and to help deliver good ecological status under WFD, requires continuity and consistency across neighbouring council boundaries. Cross-boundary working should form part of work under the Duty to Co-operate. The conservation and enhancement of the natural environment is listed as one of the strategic priorities that should be considered in the local plan. We encourage the council to work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual local plans.

The outcomes we want to see:

- Local Plan strategies and policies that enhance and protect water related biodiversity and contribute to helping wildlife adapt to climate change and reducing its adverse impacts.
- Future development that improves water related biodiversity through valuing nature, protecting and enhancing or creating healthy, well-functioning ecosystems and ecological networks

The SA for the Local Plan is an opportunity to incorporate evidence and advice into plan making to ensure decisions are made which do not result in net loss, and where possible result in an overall net gain in biodiversity.

- We encourage the council to use the best available environmental data showing sites and species of ecological importance to ensure development is located away from these areas. Consideration should be given to Local Biodiversity Action Plans and Nature Improvement Areas.
- Policies should be included in the Local Plan which protect designated and priority sites and species
- Policies should require developers to avoid adverse impacts on biodiversity, and provide net gains in biodiversity where possible.
- Where, by exception, development has to be located in or near areas of ecological importance or is likely to result in negative impacts, the council should consider appropriate mitigation, or (as a last resort) adequate compensation must be provided.
- We encourage the council to set out opportunities to create new habitats that will provide multiple benefits for example as part of green infrastructure, and flood alleviation

We encourage the council to include policies to promote appropriate green infrastructure in new development. This could include policies to require de-culverting, creation and management of ecological buffer strips and corridors, new wetland areas to help manage flood risk and reduce diffuse pollution whilst re-connecting people with nature etc.

Water Framework objectives

- WFD objectives and local River Basin Management Plan actions should be used to inform the Local Plan making process. The council should consider the priorities in the RBMP to help deliver WFD objectives.
- The council should use the SA process to show where WFD requirements will have to be met and what actions and/or mitigation measures will be required to deliver them.
- We encourage the council to help deliver catchment-wide WFD objectives by cross-boundary planning to resolve any land use issues that are contributing to preventing good ecological status (or potential) being achieved.

Biodiversity Planning Toolkit

The Toolkit provides information on the issues to be considered at the strategic planning stage, including gathering a sufficient evidence base, biodiversity opportunity mapping, green

infrastructure provision, setting spatial biodiversity objectives and targets and identifying potential for biodiversity enhancements. Website: <http://www.biodiversityplanningtoolkit.com/>
Website: [http://www.biodiversityplanningtoolkit.com/stylesheet.asp?file=1011_introduction - biodiversity and your plan](http://www.biodiversityplanningtoolkit.com/stylesheet.asp?file=1011_introduction_-_biodiversity_and_your_plan)

Waste

Local waste management activities that are poorly run can pollute the environment, cause harm to human health and generate nuisance impacts for local communities. Illegal waste activity can blight local areas as well as polluting the environment and causing harm to human health. Waste planning has a role to play in delivering objectives including reducing greenhouse gas emissions, the better management of resources and protecting the environment. Waste management facilities have the potential to pollute the environment through emissions to air, releases to ground and surface water and leaving a legacy of contaminated land. Waste Local Plans can help prevent this by making sure that sites for waste facilities are located and designed to minimise their impact.

Effective planning for waste infrastructure needs to reflect the needs of neighbouring authorities, or further afield in the case of some waste streams such as hazardous waste or other specialist waste streams. Waste Technical Advisory Bodies, comprised of planning authorities and others, still meet to advice on the cross-boundary management of waste.

Permitted waste management facilities submit waste returns that detail the types and quantities of waste they have handled. As well as being used to monitor the performance of sites against the requirements of their permits, waste data (hazardous and non-hazardous) is also used nationally by Local Authorities (via [Datashare](#)) and the waste industry to inform their waste planning activities – this information can help Maximising opportunities to plan strategically for ongoing changes in the Waste management sector, tackling waste crime and delivering government objectives to move towards a circular economy in line with the Resources and waste strategy for England and Independent review into serious and organised crime in the waste sector and the London Plan.

We encourage continued partnership working to ensure waste management infrastructure is "fit for purpose" and resilient to a changing climate and supports the rising numbers of new households.

Water Resources

Water resource planning does not follow local authority boundaries. Planning for water resources and water supply in Local Plans should reflect the plans of neighbouring councils and water company resource zones. Cross-boundary working should form part of work under the Duty to Co-operate. The process will be more effective and better informed if it involves water supply companies.

The Local plan can help to ensure that water resources are protected and, where evidence justifies, that water efficiency measures are adopted as part of regeneration and development.

The Local Plan offer an opportunity to consider development in the context of available water resources, balancing economic growth with protecting and enhancing the water environment. It should consider all water users, ensuring domestic supplies are protected but not at the expense of the environment and other users

Water Quality

The Local Plan should consider the capacity and quality of water supply systems and any impact development may have on the environment, including understanding the supply and demand patterns now and in the future across the borough area.

Projected water availability should take account of the impact of a changing climate. Water companies hold information and data to help with this and the council should work closely with water companies. This information should be reflected in the Sustainability Appraisal.

We encourage the council to ensure the emerging Local Plan and major developments identify and plan for the required levels of water efficiency and water supply infrastructure to support growth, taking into account costs and timings/phasing of development. The Infrastructure Delivery Plans can help with understanding of what is needed and are therefore an important part of the evidence base.

We encourage the council to use evidence and talk to the water companies to identify where new infrastructure is planned/needed to deliver the development required in the Local Plan.

- Check that an appropriate policy is in place to ensure water supply infrastructure can support the proposed growth. Where necessary, suggest the council consider phasing development so that any new water infrastructure is in place before occupation.
- Encourage the council to use a catchment-based approach to properly reflect water resources in the Local Plan.
- Ensure that the council has fully taken into account the availability of water in new developments, particularly in areas of water stress.
- Policies should promote Green Infrastructure as part of new development to promote infiltration of surface water drainage to help recharge groundwater as well as providing wider environmental benefits.
- Ensure the evidence and assessments that support the Local Plan, including the Infrastructure Delivery Plan, any water cycle study and the SA, reflect potential climate change impacts on water resources e.g. long periods of little rainfall.

Groundwater and contaminated land

Contamination in or on land can present unacceptable risks to human health and the wider environment, including to groundwater. Land contamination is often caused by previous uses such as former factories as well as new development such as petrol filling stations and cemeteries. Land contamination, or the potential for contamination, is a material planning consideration.

The overarching approach to groundwater protection needs to be considered at the strategic planning stage. The Local Plan should identify sensitive groundwater areas along with policies for alternative approaches, such as cross boundary discussions with neighbouring councils, Environment Agency where source protection zones straddle boundaries and Water Companies.

The outcomes we want to see:

- Groundwater is protected and improved for the benefit of people and the economy

- Future developments are in appropriate locations where pollution and other adverse effects on the local environmental or amenity value are minimised.
- Local plan policies and strategies help to ensure that developing land affected by contamination won't create unacceptable risks, or allow existing ones to continue.
- Land is managed sustainably, protecting soils and water and contributing positively to reducing the impacts of and adapting to climate change.

The local plan should ensure the evidence base takes a risk based approach to defining contaminated land by identifying the source-pathway-receptor (contaminant linkages). This should inform the council where Preliminary Risk Assessment (PRA) is required.

- Policies should require developers to submit a PRA together with a planning application where land is potentially contaminated.

For potentially contaminated land;

- Policies should require developers to ensure sites are suitable or made suitable for the intended use
- Policies should require developers to prevent discharges to ground through land affected by contamination
- Policies should encourage the implementation of measures that prevent contamination being activated or spread when development takes place for any land which is affected by contamination.
- Policies should link to and promote relevant guidance such as Groundwater Protection: Principles and Practice (GP3), the Model Procedures for the Management of Land Contamination (CLR11) and our Guiding Principles for Land Contamination.
- Encourage the council to consider our groundwater protection hierarchy and Water Company's Water Resource Management Plans to inform Local Plan preparation
- Policies should require developers to avoid potential dewatering activities being located in the most sensitive locations (areas that overlie SPZs) from a groundwater protection viewpoint.
- Provide and encourage the council to use our evidence, information and advice (maps and descriptions showing geology, hydrogeology and the location of source protection zones (SPZ)).

We will provide council with advice and support:

- Where strategic sites are proposed in SPZ 1 or near to sites regulated by the Environment Agency, including areas where we are likely to object to certain activities that could damage or diminish groundwater resources.

 MRTPI



RE: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework [UNC]

From Planning Policy <PlanningPolicy@guildford.gov.uk>

Date Fri 2022-05-27 11:07

To [REDACTED]

Cc [REDACTED]

Dear [REDACTED]

Thank you for your email. Please find our responses in red below.

Kind regards, [REDACTED]

From: [REDACTED]

Sent: 25 May 2022 13:36

To: Planning Policy <PlanningPolicy@guildford.gov.uk>

Subject: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

Dear Guildford Borough Council

Epsom & Ewell Borough Council (EEBC) are currently preparing a Duty to Co-operate Framework (attached). This seeks to identify the strategic cross boundary issues that will be addressed in the local plan, which require co-operation with partners.

To ensure the relevant issues /organisations to co-operate with are identified, we are consulting with our duty to co-operate partners to seek their input into the process.

For Guildford, we have identified the following specific issues that will need co-operation:

- Housing needs **As we sit in neighbouring HMAs we agree that this is a strategic issue as unmet need arising in one has the potential to have cross boundary impacts.**
- Gypsy & Traveller accommodation needs **We agree that this is a strategic issue as unmet need arising in one has the potential to have cross boundary impacts.**

Further detail on these can be located in Section 4 of the attached framework, page 7.

I would welcome your comments on:

- Whether all the relevant strategic issues that require co-operation have been identified in the Framework. **Yes**
- Whether the specific issues identified for co-operation with you are relevant. **See above**
- Any wider comments on the document.

A response would be appreciated by Friday 17 June. Please let me know if you wish to discuss anything further on this or if you require additional time to respond. We will also be consulting on our Land Availability Assessment (LAA) methodology in the next couple of weeks.

Kind regards

[REDACTED]
Principal Policy Officer

Epsom & Ewell Borough Council

Tel: [REDACTED]

Working days: Part time hours across Monday to Wednesday

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Historic England

[REDACTED]
Principal Policy Officer
Epsom & Ewell Borough Council

Our ref: PL00039550

Your ref:

Telephone [REDACTED]

Email

e-ssas@historicengland.org.uk

Date

15 June 2022

By email only to [REDACTED]

Dear [REDACTED]

Epsom & Ewell BC Consultation on Duty to Co-operate Framework

Thank you for your email of 25 May 2022 regarding the duty to co-operate framework.

As you are aware the Historic England (HBMCE) is a “prescribed body” by virtue of Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and is therefore required to co-operate in relation to planning of sustainable development with local planning authorities and other prescribed bodies by Section 33A of Part 2 of the Planning and Compulsory Act (as inserted by Section 110 of the Localism Act 2011).

The activities on which the prescribed bodies are required to co-operate include the preparation of a development plan and other local development documents so far as they relate to a strategic matter; i.e. sustainable development or use of land that has or would have a significant impact on at least two planning areas.

Historic England confines its involvement in planning issues to matters that involve or otherwise affect the historic environment. Historic England’s duty to co-operate is therefore appropriate in respect of strategic matters that would involve or otherwise affect a nationally designated heritage asset.

According to our records, there are a number of heritage assets that adjoin the Borough boundary and therefore might potentially be affected by strategic matters: i.e. Old Malden Conservation Area; Nonsuch Park Registered Park and Garden (grade II); Cheam Village Conservation Area; West Park Conservation Area; and Castle Hill, Chessington Scheduled Monument. There are also a number of listed buildings located in close proximity to the Borough boundary which could potentially be affected by strategic matters.



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





Historic England

There do not appear, however, to be any strategic matters within the Framework document that would directly affect heritage assets and that would require a formal statement of common ground with Historic England.

I note that cross-boundary housing sites are also identified as a major issue. If any of these would involve or otherwise affect a nationally designated heritage asset, then again Historic England should be involved.

These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.

Yours sincerely

[Redacted signature]

Historic Environment Planning Adviser



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





Outlook

Re: Epsom & Ewell Borough Council: Consultation on Duty to Co-operate Framework

From [REDACTED]**Date** Wed 2022-06-15 15:00**To** [REDACTED]

Hi [REDACTED]

My apologies for not coming back to you sooner but now that the dust has settled on the Derby, we can return to normal life a bit!

We think that this document captures well how EEBC seeks to support the racing industry but would like to suggest the following amendments please:-

- Overview of the issue – change from “To support the local racehorse training industry, through the local plan” to **“To support the local horseracing industry, including the racecourse and racehorse training, through the local plan”**.
- Jockey Club Racecourses and Jockey Club Estates - it states that The Jockey Club owns Epsom Downs Racecourse and the Jockey Club Estates is responsible for the management and maintenance of the racehorse training grounds at Epsom, but it should be amended to **“The Jockey Club owns Epsom Downs Racecourse and Training Grounds, and is responsible for the operation of the racecourse and the management and maintenance of the racehorse training grounds at Epsom”**.

Trust this is all in order but if there are any other questions, please feel free to drop me a line.

Many thanks



General Manager – Epsom Downs & Kempton Park Racecourses

The Jockey Club

Aintree | Carlisle | Haydock Park

Cheltenham | Exeter | Warwick | Wincanton

Huntingdon | Market Rasen | Newmarket | Nottingham

Epsom Downs | Sandown Park | Kempton Park

T: +44 (0) [REDACTED]

M: +44 (0) [REDACTED]

From: [REDACTED] <[REDACTED]>**Date:** Wednesday, 25 May 2022 at 13:56**To:** Jockey Club Estates, Estates <Estates@thejockeyclub.co.uk>, Info, The Jockey Club <info@thejockeyclub.co.uk>, [REDACTED]**Subject:** Epsom & Ewell Borough Council: Consultation on Duty to Co-operate Framework

Dear Jockey Club/Jockey Club Estates

Epsom & Ewell Borough Council (EEBC) are currently preparing a Duty to Co-operate Framework (attached). This seeks to identify the strategic cross boundary issues that will be addressed in the local plan, which require co-operation with partners.

To ensure the relevant issues /organisations to co-operate with are identified, we are consulting with our duty to co-operate partners to seek their input into the process.

For the Jockey Club/Jockey Club Estates, we have identified the following specific issue that will need co-operation:

- Local horse racing industry

Further detail on this issue can be located in Section 4 of the attached framework, page 7.

I would welcome your comments on:

- Whether all the relevant strategic issues that require co-operation have been identified in the Framework.
- Whether the specific issue identified for co-operation with you are relevant.
- Any wider comments on the document.

A response would be appreciated by Friday 17 June. Please let me know if you wish to discuss anything further on this or if you require additional time to respond.

Kind regards

Principal Policy Officer

Epsom & Ewell Borough Council

Tel: 0

Working days: Part time hours across Monday to Wednesday

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Outlook

RE: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

From Planning Policy <[REDACTED]>**Date** Fri 2022-06-24 14:53**To** [REDACTED]

Dear [REDACTED]

We will get back to your request at a later date, in light of Mole Valleys ongoing examination-in-public. I cannot provide you with a timeframe for when we will respond to your request.

Kind Regards

[REDACTED]
Planning Policy Officer (Information and Monitoring)
[Mole Valley District Council](#)

[REDACTED]
molevalley.gov.uk

[Twitter](#) | [Facebook](#) | [Instagram](#) | [LinkedIn](#) | [YouTube](#)

From: [REDACTED]**Sent:** 24 June 2022 14:03**To:** Planning Policy <[REDACTED]>; Planning Policy
<Planning.Policy@molevalley.gov.uk>**Subject:** [EXTERNAL] FW: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

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Dear MVDC

I understand you are probably very busy with the Local Plan examination at the moment but would be grateful for a response to the consultation on our Duty to Co-operate as per my email below.

I'd be happy to talk this through over the phone if easier?

Many thanks

From: [REDACTED]**Sent:** 25 May 2022 13:22**To:** planning.policy@molevalley.gov.uk; local.plans@molevalley.gov.uk

Cc:**Subject:** Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

Dear Mole Valley District Council

Epsom & Ewell Borough Council (EEBC) are currently preparing a Duty to Co-operate Framework (attached). This seeks to identify the strategic cross boundary issues that will be addressed in the local plan, which require co-operation with partners.

To ensure the relevant issues /organisations to co-operate with are identified, we are consulting with our duty to co-operate partners to seek their input into the process.

For Mole Valley, we have identified the following specific issues that will need co-operation:

- Housing needs
- Gypsy & Traveller accommodation needs
- Economic development needs
- Local horse racing industry
- Education needs
- Healthcare needs

Further detail on these can be located in Section 4 of the attached framework, page 7.

I would welcome your comments on:

- Whether all the relevant strategic issues that require co-operation have been identified in the Framework.
- Whether the specific issues identified for co-operation with you are relevant.
- Any wider comments on the document.

A response would be appreciated by Friday 17 June. Please let me know if you wish to discuss anything further on this or if you require additional time to respond. We will also be consulting on our Land Availability Assessment (LAA) methodology in the next couple of weeks.

Kind regards

Principal Policy Officer

Epsom & Ewell Borough Council

Tel:

Working days: Part time hours across Monday to Wednesday

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Outlook

RE: 2022-06-17 393835 Consultation on Duty to Co-operate Framework Epsom & Ewell Borough Council

From [REDACTED]
Date Tue 2022-05-31 11:08
To [REDACTED]

Dear [REDACTED]

Your reference: Consultation on Duty to Co-operate Framework
Our reference: 393835

Thank you for your email regarding the above.

We can confirm that the key strategic issues on which we would wish to be involved in discussions have been correctly identified, recognising that several other strategic issues are likely to influence this topic.

Natural England could also be consulted on issues relating to the conservation and enhancement of the natural environment as highlighted to be included in the Local Plan.

Kind Regards,

[REDACTED]
Sustainable Development Lead Advisor
Natural England

[\[www.naturalengland.org.uk\]](http://www.naturalengland.org.uk)www.naturalengland.org.uk

<https://twitter.com/NEThamesSolent>

<https://www.facebook.com/NEThamesSolent/>



From: [REDACTED]
Sent: 25 May 2022 14:18
To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Subject: Epsom & Ewell Borough Council: Consultation on Duty to Co-operate Framework

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Natural England

Epsom & Ewell Borough Council (EEBC) are currently preparing a Duty to Co-operate Framework (attached). This seeks to identify the strategic cross boundary issues that will be addressed in the local plan, which require co-operation with partners.

To ensure the relevant issues /organisations to co-operate with are identified, we are consulting with the prescribed bodies to seek their input into the process.

I would welcome your comments on:

- Whether all the relevant strategic issues that require co-operation have been identified in the Framework (Section 4, page 7).
- Any wider comments on the document.

A response would be appreciated by Friday 17 June. Please let me know if you wish to discuss anything further on this or if you require additional time to respond.

Kind regards

[REDACTED]
Principal Policy Officer

Epsom & Ewell Borough Council

Tel: [REDACTED]

Working days: Part time hours across Monday to Wednesday

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Planning Policy Team
Epsom and Ewell Borough Council
Town Hall
The Parade
Epsom, Surrey
KT18 5BY

By email: ldf@reigate-banstead.gov.uk

Date: 27 June 2022

Dear Sir/Madam,

RE: Epsom and Ewell Borough Council Draft Duty to Co-operate Framework Consultation

Thank you for the opportunity to comment on the Epsom and Ewell draft Duty to Co-operate Framework dated May 2022.

The approach developed in the document is well thought out, clear to understand and provides a suitable foundation to progress local plan documents.

In terms of Reigate and Banstead's own local plan, a report is going to members in the autumn advising that a review will need to be undertaken of the current Core Strategy and Development Management Plan documents by July 2024. Furthermore, with the Core Strategy scheduled to last until mid 2027, officers are requesting permission to start work on the next local plan. Once approval has been granted by RBBC members, officers will be requesting a meeting with Epsom and Ewell planning officers under the Duty to Co-operate.

On housing, although Reigate and Banstead is maintaining a 5 year housing land supply (Housing Monitor June 2022), like Epsom and Ewell, the borough is heavily constrained and as such is unable to meet unmet housing need for Epsom and Ewell.

In terms of releasing employment sites, we would need to ensure that there are adequate premises available so as to ensure employment opportunities and not harm the local economy.

We note that you have no text in the Education or Health sections for Reigate and Banstead. Due to recent investment only very limited improvements in health and none in education facilities are currently being considered in Reigate and Banstead and those are south of the M25. As such we suspect that the proposals in Reigate and Horley would have only very limited effect on residents of Epsom and Ewell.

I trust you found these comments helpful. If you wish to discuss this further, please contact ldf@reigate-banstead.gov.uk or phone 01737 276000

Regards,

[REDACTED]

Head of Planning Services



Outlook

Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

From Planning Policy <PlanningPolicy@runnymede.gov.uk>

Date Wed 2022-05-25 15:37

To [REDACTED]

Dear [REDACTED]

Thank you for consulting Runnymede Borough Council in relation to the Epsom and Ewell Borough Council Duty to Co-operate Framework.

Having reviewed the areas of cooperation listed in the document and set out below (housing and Gypsy & Traveller accommodation needs), I can confirm that RBC agrees that the areas are the relevant ones between our organisations, as well as agreeing with the placing of RBC within the 'wider Surrey authority' category in the DtC Framework.

Kind regards,

[REDACTED] **Senior Planning Policy Officer | Runnymede Borough Council**

| www.runnymede.gov.uk

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From: [REDACTED]

Sent: 25 May 2022 13:36

To: Planning Policy <planningpolicy@runnymede.gov.uk>

Subject: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

Dear Runnymede Borough Council

Epsom & Ewell Borough Council (EEBC) are currently preparing a Duty to Co-operate Framework (attached). This seeks to identify the strategic cross boundary issues that will be addressed in the local plan, which require co-operation with partners.

To ensure the relevant issues /organisations to co-operate with are identified, we are consulting with our duty to co-operate partners to seek their input into the process.

For Runnymede, we have identified the following specific issues that will need co-operation:

- Housing needs
- Gypsy & Traveller accommodation needs

Further detail on these can be located in Section 4 of the attached framework, page 7.

I would welcome your comments on:

- Whether all the relevant strategic issues that require co-operation have been identified in the Framework.
- Whether the specific issues identified for co-operation with you are relevant.
- Any wider comments on the document.

A response would be appreciated by Friday 17 June. Please let me know if you wish to discuss anything further on this or if you require additional time to respond. We will also be consulting on our Land Availability Assessment (LAA) methodology in the next couple of weeks.

Kind regards

Principal Policy Officer
Epsom & Ewell Borough Council
Tel:
Working days: Part time hours across Monday to Wednesday

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RE: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

From [REDACTED]
Date Tue 2022-06-07 16:31
To [REDACTED]
Cc [REDACTED] Planning Consultations/EAI/SCC
<planning.consultations@surreycc.gov.uk>

1 attachment (19 KB)
Place Ambition FAQs.docx;

Dear [REDACTED]

Thank you for consulting Surrey County Council on the Duty to Co-operate Framework.

We have a number of comments on the strategic issues that require cooperation.

- We would suggest the inclusion of the topic of biodiversity. SCC has been notified, on a provisional basis, that it will be the responsible body for a county wide Local Nature Recovery Strategy (LNRS). The county therefore has a strategic interest in biodiversity arising from this role.
- We also suggest that a broader heading of infrastructure would be appropriate. This would include Education, including SEND provision, but would extend to other areas such as waste infrastructure and community facilities such as libraries
- We note that neither Minerals and Waste or Heritage are included and suggest that they should be added given the County Council's responsibilities in this area

For information, an update to the School Organisation Plan is imminent and we will update you when this is published. In appendix one we also noticed that the imminent Spelthorne Regulation 19 is not referenced.

We also have some suggestions on wording.

The wording at the second paragraph of 2.1 could be amended to read: *The local authorities, including higher tier local authorities, that either border....*

I have attached some FAQs that have been produced during the refresh of the 2050 Place Ambition. Drawing from these, the wording relating to Surrey Future on page 3 could be amended to read:

Surrey Future Steering Board, including working groups to deliver the Surrey 2050 Place Ambition (specifically the Epsom-Leatherhead Strategic Opportunity Area)

The Surrey Future partnership, which includes Surrey's district and borough councils, Surrey County Council, the Coast to Capital and Enterprise M3 Local Enterprise Partnerships, Gatwick Diamond Business and the Surrey Nature Partnership has produced Surrey's 2050 Place Ambition, a non-statutory, strategic spatial investment framework for the county. It presents what Surrey's strategic partners want to collectively achieve in terms of "good growth". The document includes eight 'strategic opportunity areas' one of which is the Epsom to Leatherhead corridor.

Kind regards
[REDACTED]

From: [REDACTED]
Sent: 25 May 2022 13:26
To: Planning Consultations/EAI/SCC <planning.consultations@surreycc.gov.uk>; [REDACTED]
Subject: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

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Dear Surrey County Council

Epsom & Ewell Borough Council (EEBC) are currently preparing a Duty to Co-operate Framework (attached). This seeks to identify the strategic cross boundary issues that will be addressed in the local plan, which require co-operation with partners.

To ensure the relevant issues /organisations to co-operate with are identified, we are consulting with our duty to co-operate partners to seek their input into the process.

For Surrey, we have identified the following specific issues that will need co-operation:

- Housing needs
- Gypsy & Traveller accommodation needs
- Economic development needs
- Flood Risk (primarily from surface water)
- Improve sustainable transport choices
- Education needs
- Healthcare needs

Further detail on these can be located in Section 4 of the attached framework, page 7.

I would welcome your comments on:

- Whether all the relevant strategic issues that require co-operation have been identified in the Framework.
- Whether the specific issues identified for co-operation with you are relevant.
- Any wider comments on the document.

A response would be appreciated by Friday 17 June. Please let me know if you wish to discuss anything further on this or if you require additional time to respond. We will also be consulting on our Land Availability Assessment (LAA) methodology in the next couple of weeks.

Kind regards

[REDACTED]
Principal Policy Officer
Epsom & Ewell Borough Council
Tel: [REDACTED]
Working days: Part time hours across Monday to Wednesday

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Re: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

From [REDACTED]
Date Fri 2022-06-17 14:25
To [REDACTED]

Hi [REDACTED]

Thank you for your email.

I've reviewed the document and don't have any specific comments. I think everything is covered.

We are in the process of drafting our own DtC Framework at the moment, so you'll be receiving a similar email / document from us in the not too distant future.

Happy to chat if there is anything arising.

Many thanks,

[REDACTED]
[REDACTED]
Strategic Planning Manager

Strategic Planning
Environment, Housing and Neighbourhoods
London Borough of Sutton
Civic Offices, St Nicholas Way, Sutton SM1 1EA

T [REDACTED]

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On Fri, 27 May 2022 at 11:05, LBS Planning Policy <planningpolicy@sutton.gov.uk> wrote:

The Planning Policy Team

London Borough of Sutton
Civic Offices, St Nicholas Way, Sutton, SM1 1EA
0208 770 5000
planningpolicy@sutton.gov.uk

----- Forwarded message -----

From: [REDACTED]
Date: Wed, 25 May 2022 at 13:25
Subject: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework
To: LBS Planning Policy <planningpolicy@sutton.gov.uk>

Dear London Borough of Sutton

Epsom & Ewell Borough Council (EEBC) are currently preparing a Duty to Co-operate Framework (attached). This seeks to identify the strategic cross boundary issues that will be addressed in the local plan, which require co-operation with partners.

To ensure the relevant issues /organisations to co-operate with are identified, we are consulting with our duty to co-operate partners to seek their input into the process.

For Sutton, we have identified the following specific issues that will need co-operation:

- Housing needs
- Gypsy & Traveller accommodation needs
- Economic development needs
- Flood Risk (primarily from surface water)
- Improve sustainable transport choices
- Education needs
- Healthcare needs

Further detail on these can be located in Section 4 of the attached framework, page 7.

I would welcome your comments on:

- Whether all the relevant strategic issues that require co-operation have been identified in the Framework.
- Whether the specific issues identified for co-operation with you are relevant.
- Any wider comments on the document.

A response would be appreciated by Friday 17 June. Please let me know if you wish to discuss anything further on this or if you require additional time to respond. We will also be consulting on our Land Availability Assessment (LAA) methodology in the next couple of weeks.

Kind regards

Principal Policy Officer

Epsom & Ewell Borough Council

Tel:

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Outlook

RE: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

From LocalPlan <LocalPlan@tandridge.gov.uk>**Date** Tue 2022-06-21 10:19**To** [REDACTED]

Dear [REDACTED]

Thank you for your email and for consulting Tandridge DC on Epsom and Ewell BC's Duty to Co-operate Framework. Whilst we broadly agree with the approach the Council are taking to identify strategic cross-boundary issues, we did wish to highlight and comment on a couple of matters in relation to references to Tandridge.

In the draft DtC framework, paragraph 4.2 addresses the strategic cross boundary matter of meeting identified need for Gypsy and Traveller accommodation. It states that a transit site within Tandridge is currently being progressed through the planning system. This refers to the proposal for a change of use to land at Pendell Camp to a ten pitch transit site for the Gypsy, Roma and Traveller (GRT) community. The applicant, Surrey County Council sought permission and whilst the formal decision on the application will be made by Surrey County Council, Tandridge District Council were a consultee in the application process. An officer report was taken to Planning Committee on 3rd March 2022 and it was resolved that the Council would object to the Surrey County Council consultation on grounds that there was insufficient Very Special Circumstances identified to override the strong planning policy objections on Green Belt, AONB and AGLV grounds to the development. As such, the transit site scheme has since been withdrawn by Surrey County Council and no resolution has been made to progress with this application at this current time.

Additionally, Appendix 1 states the LPA positions in relation to Local Plan preparation and housing need. For Tandridge, it states that the submitted plan seeks to provide 303 dpa, over 50% unmet need. As you may be aware, Tandridge DC's emerging plan (Our Local Plan: 2033) was submitted for examination in January 2019 and whilst we have received the Inspectors' preliminary advice and conclusions, no decision on soundness of the Plan has been made. Therefore, our emerging plan remains in active examination. The NPPF requires the minimum local housing need figure for LPAs to be measured against standard methodology figures, wherever the development Plan is deemed out of date and more than five years old. This is the case in Tandridge until Our Local Plan 2033 is found sound and adopted. As such, whilst under the current standard method the Council cannot demonstrate a 5 year housing land supply, this must be seen alongside the calculations using new Local Plan proposals, where a 5 year supply can be shown. Our Local Plan 2033 would set a realistic housing requirement for the District and boost supply by release of some greenfield / Green Belt sites for housing development.

We hope you take our above comments into account as you progress and finalise your Duty to Co-operate Framework.

If you have any further questions then please do not hesitate to ask.

Kind regards,

[REDACTED]

[REDACTED]

Strategy Specialist
Strategy

Tandridge District Council
The Council Offices
8 Station Road East
Oxted, Surrey
RH8 0BT

Tel: 01883732867

[\[www.tandridge.gov.uk\]](http://www.tandridge.gov.uk)www.tandridge.gov.uk

From: [REDACTED]
Sent: 16 June 2022 12:37
To: LocalPlan <LocalPlan@tandridge.gov.uk>
Subject: RE: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

Hi [REDACTED]

Thanks for you email. Yes, a response by the end of next week would be fine.

Many thanks

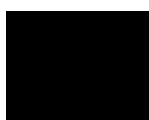


From: LocalPlan <LocalPlan@tandridge.gov.uk>
Sent: 16 June 2022 09:11
To: [REDACTED]
Subject: RE: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

Hi [REDACTED]

Thank you for contacting Tandridge for a response to your draft Duty to Co-operate Framework. Work is underway to get a response to you however, we were wondering if we could have a little bit more time to respond? We can aim to have a response submitted by the end of next week, if that would be possible.

Kind regards,



Strategy Specialist
Strategy

Tandridge District Council
The Council Offices
8 Station Road East
Oxted, Surrey
RH8 0BT

[\[www.tandridge.gov.uk\]](http://www.tandridge.gov.uk)www.tandridge.gov.uk

From: [REDACTED]
Sent: 25 May 2022 13:43
To: LocalPlan <LocalPlan@tandridge.gov.uk>
Subject: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

Dear Tandridge District Council

Epsom & Ewell Borough Council (EEBC) are currently preparing a Duty to Co-operate Framework (attached). This seeks to identify the strategic cross boundary issues that will be addressed in the local plan, which require co-operation with partners.

To ensure the relevant issues /organisations to co-operate with are identified, we are consulting with our duty to co-operate partners to seek their input into the process.

For Tandridge, we have identified the following specific issues that will need co-operation:

- Housing needs
- Gypsy & Traveller accommodation needs

Further detail on these can be located in Section 4 of the attached framework, page 7.

I would welcome your comments on:

- Whether all the relevant strategic issues that require co-operation have been identified in the Framework.
- Whether the specific issues identified for co-operation with you are relevant.
- Any wider comments on the document.

A response would be appreciated by Friday 17 June. Please let me know if you wish to discuss anything further on this or if you require additional time to respond. We will also be consulting on our Land Availability Assessment (LAA) methodology in the next couple of weeks.

Kind regards


Principal Policy Officer

Epsom & Ewell Borough Council

T 

Working days: Part time hours across Monday to Wednesday

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Outlook

RE: Epsom & Ewell Borough Council: Consultation on Duty to Co-operate

From [REDACTED]
Date Tue 2022-06-28 09:11
To [REDACTED]
Cc Thames Water Planning Policy <ThamesWaterPlanningPolicy@thameswater.co.uk>

Dear [REDACTED]

Apologies for the late response to your email below. In relation to cross boundary matters, in addition to flood risk from surface water, consideration also needs to be given to potential sewer flooding, sewage treatment and water supply and water treatment as both issues can be affected by development outside the borough and development within the borough can have impacts outside of the borough. However, in practice these issues can be addressed by working proactively with the council throughout the local plan and development management processes to ensure that there are suitable policies to enable phasing conditions to be used to ensure development is not occupied until any necessary upgrades to the water or sewerage networks are in place.

We would welcome inclusion of policies on the following matters in the Local Plan:

- Support for infrastructure provision to assist with delivery of any upgrades to works, new works or pumping stations that may be necessary to support growth
- Requirements for developers to demonstrate that they have considered the impacts of development on water and sewerage networks and that development will not outpace the delivery of any network upgrades. This could result in requirements for phasing conditions and supporting text should encourage developers to engage with infrastructure providers ahead of the submission of planning applications to identify any network constraints. Such conditions are required as some upgrades can take 18months to 3 years to deliver and water companies do not have powers to prevent connection to the existing networks even if it is known that there is not sufficient capacity in the existing network.
- Prevention of development close to existing sources of odour, noise, light or vibration unless it has been demonstrated that there will be no adverse impact on amenity of future occupiers or that any necessary mitigation has been secured.
- Requirement for the optional standard for water efficiency of 110 litres per person per day to be applied to new residential development. For this to be applied through Building Regulations, a planning condition needs to be included on all permissions requiring the optional standard to be met.
- A requirement for any basement development connected to the sewerage network to be fitted with positive pumped devices to mitigate against the risk of sewer flooding.

I trust that the above information is of use, however, if you would like any clarification on any of the matters above please do not hesitate to contact me.

Kind regards,

[REDACTED]
Planner
[REDACTED]
[REDACTED]

1st Floor West, Clearwater Court, Vastern Road, Reading, Berkshire, RG1 8DB

My working days are Monday to Thursday



RE: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

From: [REDACTED]
Date: Fri 2022-06-24 11:48
To: [REDACTED]
Cc: Planning Policy <planningpolicy@waverley.gov.uk>

Dear [REDACTED]

Further to my email, Waverley officers have now had a chance to consider the above. However, we have no comments to make on the DtC Framework.

Thank you for giving us the opportunity to respond, particularly beyond the original deadline.

Kind regards

[REDACTED]
Team Leader (Local Plans and Planning Policy)
Waverley Borough Council

[REDACTED]
www.waverley.gov.uk

From: [REDACTED]
Sent: 08 June 2022 11:36
To: [REDACTED]
Subject: RE: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

Dear [REDACTED]

Thank you for your reply.

I will aim to look at the DtC document the week commencing the 20th June 2022. Once I have I will come back to you as to when I think Waverley can respond.

Kind regards

[REDACTED]
Team Leader (Local Plans and Planning Policy)
Waverley Borough Council

[REDACTED]
www.waverley.gov.uk

From: [REDACTED]
Sent: 08 June 2022 11:02
To: [REDACTED]
Subject: RE: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

[This email originates from an external source **]**

Hi [REDACTED]

Yes, that is fine. Please let me know either way the document can be updated anytime.

Good luck with the Inspector's questions!

Thanks

From: [REDACTED]
Sent: 25 May 2022 16:43
To: Susie Legg <[REDACTED]>
Cc: Planning Policy <planningpolicy@waverley.gov.uk>
Subject: FW: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

Dear [REDACTED]

Thank you for consulting us on the above.

Your deadline for a response is the same day as the Waverley's deadline for responding to the Waverley Local Plan Examination Inspector's Matter and Issues Questions.

As such, it would be really helpful if you could extend the deadline for Waverley to respond if we feel a response is necessary.

Thanks

[REDACTED]
Team Leader (Local Plans and Planning Policy)
Waverley Borough Council
Tel: [REDACTED]
www.waverley.gov.uk

From: [REDACTED]
Sent: 25 May 2022 13:42
To: Planning Policy <planningpolicy@waverley.gov.uk>
Subject: Epsom & Ewell BC: Consultation on Duty to Co-operate Framework

[This email originates from an external source **]**

Dear Waverley Borough Council

Epsom & Ewell Borough Council (EEBC) are currently preparing a Duty to Co-operate Framework (attached). This seeks to identify the strategic cross boundary issues that will be addressed in the local plan, which require co-operation with partners.

To ensure the relevant issues /organisations to co-operate with are identified, we are consulting with our duty to co-operate partners to seek their input into the process.

For Waverley, we have identified the following specific issues that will need co-operation:

- Housing needs
- Gypsy & Traveller accommodation needs

Further detail on these can be located in Section 4 of the attached framework, page 7.

I would welcome your comments on:

- Whether all the relevant strategic issues that require co-operation have been identified in the Framework.
- Whether the specific issues identified for co-operation with you are relevant.
- Any wider comments on the document.

A response would be appreciated by Friday 17 June. Please let me know if you wish to discuss anything further on this or if you require additional time to respond. We will also be consulting on our Land Availability Assessment (LAA) methodology in the next couple of weeks.

Kind regards

Principal Policy Officer

Epsom & Ewell Borough Council

Tel:

Working days: Part time hours across Monday to Wednesday

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easthants.gov.uk

[REDACTED]
Head of Place Development
Epsom & Ewell Borough Council,
Town Hall,
The Parade
Epsom,
Surrey KT18 5BY

Enquiries to: [REDACTED]
Direct line: [REDACTED]
Email: [REDACTED]
My reference: NM/EMT/20240715
Your reference:
Date: 15th July 2024

Dear [REDACTED],

Many thanks for your letter regarding housing land supply, dated 10th July 2024. We appreciate the situation you find yourselves in, however East Hampshire District Council is not currently able to assist.

The geography and housing market is such that providing new homes in East Hampshire district would be ineffective in alleviating housing needs in Epsom and Ewell Borough and we are not convinced there is evidence to the contrary.

We are currently preparing a new Local Plan for our district (outside the South Downs National Park). Our next step is pre-submission (Reg.19) consultation. Whilst we are aiming to meet our own housing needs, we are already being asked to consider unmet needs from authorities much closer to us; the SDNPA, Havant and Portsmouth. We have in the past also been asked to assist Elmbridge, to which we have responded in the same way as to you. There is a limit to the amount of unmet housing needs from elsewhere that we as a rural authority can sustainably accommodate. Our absence of Green Belt does not in itself justify us accommodating the unmet housing needs of Surrey Green Belt authorities.

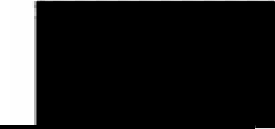
The new Government is looking carefully at Green Belt authorities and we would expect Epsom to consider what recommendations are being made nationally about mandatory housing requirements and Green Belt land. Whilst appreciating that might not be the solution to your difficulties, a national approach with regards to Green Belt is required. As we progress our Local Plan we will be considering and testing our capacity to meet unmet needs through our Integrated Impact Assessment. This will be documented in our Pre Submission (Reg19) consultation, to which you are welcome to respond.

We are experiencing similar challenges with regards to providing additional Gypsy and Traveller accommodation. Our new GTAA is expected to be published shortly and continues to identify high need that is challenging for us to accommodate. We are not able to assist you with this at this time.

We are currently updating our Land Availability Assessment (LAA), to be published over the summer. All of our latest evidence base is online at <https://www.easthants.gov.uk/planning-services/planning-policy/local-plan/emerging-local-plan/evidence-base>

Whilst we appreciate this isn't the response you would like, nonetheless it probably isn't unexpected. We wish you all the best with your Reg.19 consultation.

Yours sincerely

A large black rectangular redaction box covering the signature of the Director of Regulation & Enforcement.

Director of Regulation & Enforcement

[REDACTED]

From: Planning Policy <PlanningPolicy@guildford.gov.uk>
Sent: 30 July 2024 15:19
To: Local Plan
Cc: [REDACTED]
Subject: [WARNING EXTERNAL] RE: DtC Housing Land Supply: Epsom & Ewell Borough Council

Dea [REDACTED]

Thank you for your email. In November 2022, GBC confirmed that Guildford were unable to assist Epsom and Ewell in meeting the anticipated shortfall in meeting the full identified housing need (OAN). The Guildford borough Local Plan: strategy and sites 2019 (LPSS) identifies sufficient sites to meet Guildford's full need with an appropriate level of supply over and above the minimum requirement to ensure that the OAN can actually be delivered over the plan period and a rolling five year land supply can be maintained. Since then, there have been ongoing challenges in terms of bringing forward a number of the strategic site allocations. It was always acknowledged that the strategic sites would have a longer lead in time and primarily deliver housing after the first five years from adoption. Strategic sites are often complex and challenging to deliver and progress on these sites has not been as swift as originally expected. The new settlement at Wisley Airfield has only just received outline planning permission but there are currently no planning applications under consideration for urban extensions at Blackwell Farm or Gosden Hill Farm. With the delays to these sites, the projected supply over the coming years is likely to remain challenging. Furthermore, the LPSS is now also more than five years old and a decision has been made that it requires updating. Guildford's Standard Method number is currently higher than the housing requirement in the LPSS.

With regards to travellers and as previously set out, the LPSS makes sufficient provision to meet Guildford's identified need. As a result of the delays to the strategic sites, the delivery of traveller pitches has also been delayed. Furthermore with the recent change to the definition of a traveller (which now encompasses those who have ceased to travel on a permanent basis) GBC are currently unlikely to be able to show a five-year supply of available traveller sites when we publish our forthcoming Land Availability Assessment 2024.

For this reason, all currently planned housing and traveller supply is necessary to meet Guildford's housing need and there is no surplus that could be used to accommodate any unmet needs arising from neighbouring authorities. GBC would re-iterate what was previously highlighted regarding Guildford's demonstration of exceptional circumstances to justify amending Green Belt boundaries to ensure that identified needs could be met. Given the serious extent of your shortfall if relying solely on your urban areas, GBC consider that a thorough and robust approach will be necessary in demonstrating that Epsom and Ewell's housing needs cannot be met in full.

Kind regards,

Planning Policy
Guildford Borough Council

From: Local Plan <LocalPlan@epsom-ewell.gov.uk>
Sent: Wednesday, July 10, 2024 11:11 AM
To: Planning Policy <PlanningPolicy@guildford.gov.uk>
Subject: DtC Housing Land Supply: Epsom & Ewell Borough Council

Dear Guildford Borough Council

Please find attached a letter regarding Housing Land Supply and Gypsy and Traveller accommodation needs for your consideration.

We would appreciate a response to this letter by 9 August 2024.

Kind regards


Principal Policy Officer

Epsom & Ewell Borough Council


time hours across Monday to Wednesday

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Executive Director of Place



Spatial Planning Team

The Royal Borough of Kingston upon Thames
Guildhall 2
High Street
Kingston upon Thames
KT1 1EU

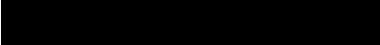
Tel: 

Email: spatial.planning@kingston.gov.uk

Website: www.kingston.gov.uk



Head of Place Development



Sent via email to: localplan@epsom-ewell.gov.uk

5th August 2024

Dear 

I am writing in response to your letter dated 10th July 2024, as well as your previous correspondence with this authority regarding Epsom and Ewell Borough Council's Local Plan and the Duty to Cooperate. I understand from your correspondence that you are requesting that the Royal Borough of Kingston Upon Thames work towards assisting your borough to meet its unmet housing needs and Gypsy and Traveller accommodation needs.

We acknowledge the constraints that cover much of the land in Epsom & Ewell and the challenges these present in trying to meet your housing needs within the existing built-up areas.

The Royal Borough of Kingston upon Thames also has significant protected areas:

- 17% of the land in our Borough is covered by Green Belt.
- 15% of the land in our Borough is covered by Metropolitan Open Land.
- 9% of the land in our Borough is covered by Conservation Areas.

We are currently working to identify how we can optimise delivery of the sites that have been identified as having potential to deliver additional homes in our Borough. Nonetheless, at this moment in time, we are currently unable to accommodate any unmet housing needs beyond the already very challenging housing requirement prescribed in the London Plan to deliver 9,640 additional homes in the Borough between 2019/20 and 2028/29.

In relation to the identified needs of Gypsies and Travellers, the 2018 Kingston Gypsy and Traveller Accommodation Needs Assessment (GTANA) identified an unmet need for 44 pitches for the period up to 2041 (arising to 74 pitches if the definition for Gypsies and Travellers in the updated Planning Policy for Traveller Sites is used). We are currently facing challenges in identifying suitable sites to meet this target due to the aforementioned land constraints, and as a result, we are unable to take on any additional requirements at this time.

The council is committed to positive engagement with neighbouring authorities, in line with the Duty to Cooperate, in the preparation of its and others' Local Plans and looks forward to further discussions on relevant issues as our separate plans progress.

Yours sincerely,

A large black rectangular box redacting the signature of the Head of Spatial Planning.A small black rectangular box redacting the name of the Head of Spatial Planning.

Head of Spatial Planning

Head of Place Development
Epsom and Ewell Borough Council
By email: localplan@epsom-ewell.gov.uk

If telephoning please ask for: [REDACTED]

Email: planning.policy@molevalley.gov.uk

25 July 2024

Epsom and Ewell BC (EEBC): Duty to Cooperate: Housing Land Supply

Dear [REDACTED]

Thank you for consulting Mole Valley District Council (MVDC) on EEBC's housing and gypsy and traveller accommodation needs

The Emerging MVDC Local Plan

MVDC's emerging Local Plan is in its Examination-in-Public (EiP) stage. The EiP was paused for approximately a year until the uncertainty regarding proposed changes to the National Planning Policy Framework (NPPF) was resolved. At a meeting on the 25 January 2024, MVDC took the decision to progress with the examination of the draft Local Plan as originally submitted. A Main Modifications consultation was held in March/April, and the Council is now awaiting the Inspector's report.

Housing

EEBC's housing need is 573 new dwellings per annum, which is 10,314 dwellings across the plan period 2022 to 2040. It has currently identified the capacity to meet 33% of this need through deliverable and developable urban sites. Mole Valley is subject to fundamental restrictions that constrain its housing supply. 77% of MVDC's area is designated as either Green Belt or National Landscape. The built-up area only comprises 11% of the area and the two principal towns, Leatherhead and Dorking, are historic market towns with significant and extensive heritage constraints limiting development to little more than very gentle densification. As a result of these constraints, MVDC's emerging local plan would meet only approximately 75% of its own need. In addition, these constraints have meant that a significant proportion of housing has come through the release of an element of Green Belt land. MVDC's stage in the plan-making cycle precludes it from being able to take any unmet need. Furthermore, in light of the district's circumstances outlined above, even if MVDC were at an earlier stage in the plan preparation cycle, it would be unable to accommodate unmet housing need from other authorities.

Gypsies and Travellers

A need for 18 pitches for Gypsy and Traveller (G&T) households in Epsom and Ewell has been identified and EEBC anticipate a shortfall in pitch provision to meet this. This figure significantly below that for Mole Valley, which has an identified need of 52 G&T pitches over its draft Local Plan period (encompassing both planning and housing definitions of Gypsies and Travellers). MVDC's strategy for meeting this need is through allocating new pitches on strategic development sites, most of which would be released from the Green Belt, and intensifying specific existing G&T sites. Based on the 2021 NPPF definition, the five-year target from adoption and the need over the plan period should both be met. However, MVDC is reliant on (albeit robust) windfall provision to meet the Lisa Smith/2023 NPPF

G&T definition. The margin for manoeuvre is therefore tight, especially if one or more sites fails to be developed. MVDC's stage in the plan-making cycle precludes it from being able to take this unmet need. Furthermore, in light of the district's circumstances outlined above, even if MVDC were at an earlier stage in the plan preparation cycle, it would be unable to accommodate unmet G&T need from other authorities.

If you have any further queries, please do not hesitate to contact me.

Yours sincerely,



Deputy Chief Executive and Executive Head of Service (Planning and Environment)
Mole Valley District Council



Planning Policy

Date: 30/07/2024

Dear Epsom & Ewell Borough Council,

RE: Duty to Cooperate: Housing Land Supply

Thank you for contacting Reigate & Banstead Borough Council, requesting our assistance in meeting some of Epsom & Ewell's unmet housing need.

It is challenging in the current political climate to anticipate which sites can be safely included in the land supply calculations, particularly when it comes to sites located within the Green Belt. However, we note that even with the Green Belt sites included in the land supply, only 78% of the Standard Method calculated housing need in the Epsom & Ewell borough can be met. It is therefore understandable to seek assistance from the neighbouring local authorities.

RBBC is in the early stages of preparing a new single Local Plan. We have recently published our latest assessment of the borough's housing need in the [2024 Housing Needs Assessment](#). Within it, the Housing Market Area Technical Paper sets out to review and confirm the housing market area within which Reigate & Banstead Borough operates. The HMA technical paper concluded that the principal housing market area geography includes Reigate & Banstead in a common housing market area with Mole Valley and Tandridge. However, the paper notes there are also important localised relationships between the local authorities of Crawley and Epsom & Ewell, and the London Boroughs of Sutton and Croydon.

The 2024 Housing Needs Assessment includes a Standard Method calculated housing need figure for Reigate & Banstead of 1,119 homes per annum. We have not yet completed our housing land availability assessment, nor local plan density work. However given the availability of sites at the time of our latest HELAA (2018) and the annual Brownfield Land Register, as well as the average level of housing completions in the borough since the beginning of the existing plan period (566 dpa since 2012), combined with the high level of existing constraints in the borough (including Green Belt and flood risk), it is highly likely that RBBC will be unable to meet the full level of Standard Method

calculated housing need within the borough. Regrettably, we are therefore unable to assist Epsom & Ewell with meeting any unmet housing need.

Similarly, with regards to our assistance with meeting Epsom & Ewell's Gypsy and Traveller accommodation need, unfortunately we will not be able to assist in meeting any of your unmet need. Our latest assessment of Gypsy and Traveller accommodation needs is from the [GTAA 2017](#). Sites have been allocated in our 2019 Development Management Plan (DMP) to meet those needs. Whilst we can currently demonstrate a 5 year land supply for Gypsy and Traveller pitches, most of our DMP allocated sites have now been delivered, with the exception of G12: Land at Kents field, allocated for approximately 4 pitches, and the pitches allocated on the Sustainable Urban Extension sites. However, the SUE sites have not yet been released for development under DMP Policy MLS1's "urban first" approach. We will shortly be commissioning an updated assessment of Gypsy and Traveller accommodation needs to inform our new Local Plan.

We regret that we are unable to assist you at this time, but we look forward to our continued co-operation on housing and other cross boundary strategic matters. If you would like to discuss our response further, please contact the Planning Policy team on LDF@reigate-banstead.gov.uk or call us on [REDACTED]

Yours Sincerely,

[REDACTED]

[REDACTED]

Head of Planning

17th July 2024

[REDACTED]
Head of Place Development
Epsom and Ewell Borough Council

By email only to: localplan@epsom-ewell.gov.uk

Dear [REDACTED]

Re: Duty to Cooperate: Housing Land Supply

I am responding to your letter sent via email dated 10th July 2024 re the Duty to Cooperate and Housing Land Supply.

Your letter suggests that in the light of the work undertaken to date to prepare your Plan that you consider that there is a realistic possibility that there will be insufficient land within the existing area of the Borough to accommodate your housing need of 573 dwellings per annum. I sympathise with the difficulties you face trying to meet housing needs in a Borough of high constraint; we face a number of similar challenges in Runnymede.

Runnymede adopted its Local Plan in July 2020. The Runnymede 2030 Local Plan only plans to meet the housing needs of Runnymede. Finding sufficient suitable and deliverable sites to meet Runnymede's own housing needs in the period to 2030 was not an easy task in the context of sites available locally and against the backdrop of the Borough's environmental and planning constraints, including flood risk, Green Belt and the Thames Basin Heaths Special Protection Area. The Green Belt in Runnymede has already had to be reduced by about 4% to meet our own development needs over the Plan period.

The Gypsy and Traveller Accommodation Assessment (GTAA) which provided the evidence for the adopted Runnymede 2030 Local Plan identified a need for 83 pitches and 19 Traveller Showpeople plots during the Local Plan period of 2015-30. Runnymede Borough Council is working pro-actively to meet this identified need but, given the constraints that exist in the Borough, it is extremely difficult to meet the Council's own needs and, as a result, Runnymede is unable to meet any of Epsom and Ewell's unmet needs for Gypsies, Travellers and Travelling Showpeople.

In addition, the Duty to Cooperate evidence, which underpinned the preparation of the adopted Runnymede Local Plan, demonstrated that the functional links between Runnymede and Epsom and Ewell are limited or absent. I am therefore of the opinion that any unmet housing need or indeed Gypsy and Traveller needs from Epsom and Ewell could not, on a practical level, be reasonably met in the Borough of Runnymede.

I am sorry that I cannot be of any assistance to you but wish you the very best of luck with the preparation of the Epsom and Ewell Local Plan.

Yours sincerely



ASSISTANT PLANNING POLICY MANAGER

Email:





Your reference: N/A

Our reference: DC262

[REDACTED]
Head of Place Development

By email only to:
localplan@epsom-ewell.gov.uk

Contact: [REDACTED] Service
Manager (Planning Policy)

Telephone: [REDACTED]

Email: [REDACTED]

Date: 1st August 2024

Dear [REDACTED]

Duty to Co-Operate: Housing Land Supply

Thank you for your letter dated 10th July 2024 regarding the above duty matter and for providing a detailed update on your emerging Land Availability Assessment (LAA). We note that you refer to your previous letter on this matter, which we received in November 2022 and responded to on 2nd December 2022.

Rushmoor Borough Council (RBC) adopted its Local Plan, which meets the Borough's objectively assessed housing need over the Local Plan period (2014-2032), in February 2019. Having regard to the date of adoption, Rushmoor Borough Council has undertaken a review of the Local Plan and concluded at its Cabinet meeting on 21st November 2023 that a full update of the Local Plan policies is needed.

In March 2024, RBC published an updated Local Development Scheme in response to request from Government in a Written Ministerial Statement published in December 2023. This LDS confirms the intention to prepare a new Local Plan under the new plan-making system and includes an indicative timetable based on commencing work in Autumn 2024. This is subject to any potential transitional arrangements and there being no further delays to national policy, guidance and regulations.

As noted in our response in November 2022, we are an urban authority reliant on the redevelopment of brownfield sites to meet housing need. We have significant environmental constraints in the form of land designated as the Thames Basin Heaths Special Protection Area and meeting our objectively assessed housing need for the Local Plan was a challenge.

The Rushmoor Gypsy and Traveller Accommodation Assessment (GTAA) found the need for two additional plots for Rushmoor's well established Travelling Showpeople community. The Rushmoor Local Plan makes two site allocations to meet this need, with one allocation for a single plot having already been implemented at Peabody

Road. The other allocation is for a single plot on land in the Council's ownership on Hawley Lane and a planning application has yet to be submitted for this site.

There are currently no permanent authorised or legal transit Gypsy and Traveller sites within the Borough. The GTAA identified that there is very little permanent Gypsy and Traveller activity in Rushmoor, no provision and very little locally-generated demand. A demand for 1 pitch was identified from a bricks and mortar household who would like to move to a local authority site in the general area (local to Guildford), although not necessarily in Rushmoor, and preferably as part of an existing site. The provision of a single pitch in Rushmoor was not considered a pragmatic solution as it would be isolated from other sites and could fail to meet the cultural needs of Gypsies and Travellers by virtue of its isolation from the travelling community.

Call for sites exercises undertaken during the preparation of the Rushmoor Local Plan did not identify any land suitable for Gypsy, Travellers or Travelling Showpeople and the latest SHELAA does not contain any sites with the potential for use as Gypsy and Traveller pitches or Travelling Showpeople Plots.

Therefore, based on the above, we are not in a position to meet any of Epsom and Ewell Borough Council's unmet housing need and are unable to offer any sites for Gypsy and Traveller pitches.

Please note that, as a formal response to a request under the Duty to Cooperate, this response has been prepared in consultation with, and has been agreed by Cllr Keith Dibble, Portfolio Holder for Development and Growth.

Yours sincerely,

A large black rectangular redaction box covering the signature of the Executive Head of Property and Growth.A small black rectangular redaction box covering the name of the Executive Head of Property and Growth.

Executive Head of Property and Growth

Town Hall
The Parade
Epsom
Surrey
KT18 5BY

localplan@epsom-ewell.gov.uk

If calling please ask for Planning Policy
on 01883722000

E-mail: LocalPlan@tandridge.gov.uk

Date: 26 July 2024

Dear [REDACTED]

Unmet Housing Need Duty to Cooperate - Tandridge District Council response.

Thank you for contacting Tandridge District Council (TDC) on the matter of housing as part of your draft local plan process (Regulation 18). The Council welcomes opportunities for co-operation with Epsom and Ewell Borough Council (EEBC) where they can be of benefit to our respective authorities.

TDC considers that whilst there are no significant factors that would legitimise a formal Housing Market Area which includes both Tandridge and Epsom and Ewell, the two areas are part of a much wider Housing Market Area that shares some functional components. The Council understands that EEBC will, in the first instance, be looking to its immediate HMA when seeking assistance with meeting development needs and hope that those relevant authorities will be able to assist you.

Plan-making position

Tandridge District Council submitted 'Our Local Plan 2033' for independent examination in January 2019. The Inspector's Report was published on the 20 February 2024, bringing the examination to a close. The Inspector's final recommendation was that the submitted plan should not be adopted due to soundness issues. At a recent Full Council meeting, the decision to formally withdraw 'Our Local Plan 2033' was made and work has begun on a new Local Plan.

Housing Need and Constraints

Tandridge District Council is not currently in a position where it could help Epsom and Ewell Borough Council achieve housing needs.

Tandridge District has major policy constraints, including Green Belt covering 94% of the District, two Areas of Outstanding Natural Beauty (National Landscapes), and extensive areas subject to flooding, as well as significant infrastructure capacity constraints within the District (for example around the M25 J6 and other parts of the

customerservices@tandridge.gov.uk www.tandridge.gov.uk

Tandridge District Council, Council Offices, 8 Station Road East, Oxted, Surrey RH8 0BT
Tel: 01883 722000 - Monday-Thursday 8.30-5pm, Friday 8.30-4.30pm - Dlx: 39359 OXTED

strategic road network), all of which can reasonably be expected to significantly reduce the housing requirement.

Such a reduction was accepted at the Examination for 'Our Local Plan 2033'. A final conclusion on Objectively Assessed Need (OAN) was not reached due to cessation of the Examination, however OAN was calculated as ranging between 266 and 470, depending on the choice of annual population projections, substantially less than the estimated Local Housing Need of 639 resulting from the standard method. The Inspector concluded that the housing requirement should be less than OAN, as defined in the 2012 NPPF, due to a number of factors, including the degree of major policy constraints within the district:

'It is clear to me that there are specific policies of the Framework which indicate that development should be restricted in Tandridge and that in principle, the Plan would be sound in not meeting the OAN in full.' (Inspectors Report, Annex 1 - ID16, paragraph 44)

Whilst subsequent revisions to the NPPF have introduced the concept of local housing need, the Council nevertheless fully anticipates that the likely future housing requirement will similarly be lower than the local housing need due to the presence of the constraints outlined above.

With respect to the specific needs of Gypsies, Travellers and Travelling Showpeople, the Council will soon receive and issue an updated Gypsy and Traveller Accommodation Needs Assessment. This will inform the preparation of our new Local Plan with the respect to the allocation of and / or policy guiding pitch provision. We will update you on this matter when we have a clearer idea.

Conclusion

We look forward to continuing to work collaboratively with you on planning policy matters.

Yours faithfully,

Tandridge Planning Policy

Sent via email only to:
localplans@epsom-ewell.gov.uk

Interim Planning Policy Manager

E-mail: [REDACTED]

Direct line: [REDACTED]

Calls may be recorded for training or monitoring

Date: 08/08/2024

Dear Sir/Madam,

Duty to Co-operate: Housing Land Supply

Thank you for your letter of 10 July 2024 regarding the draft Epsom and Ewell Local Plan and housing land supply matters.

The Waverley Borough Local Plan comprises Local Plan Part 1 (LPP1) and Local Plan Part 2 (LPP2). LPP1 was adopted in February 2018 and establishes the annual housing target for the Borough and includes strategic housing allocations. As you will know the Council's housing requirement in LPP1 seeks to meet both Waverley's needs and also a proportion of unmet need from Woking.

The Council is currently at the early stages of preparing a new Local Plan for Waverley and will use the standard method as the starting point to establish the housing requirement for the Borough. At this stage Waverley Borough Council would not be in a position to assist in meeting the unmet housing need from the borough of Epsom and Ewell.

In terms of accommodating the need for gypsy and traveller accommodation, the Council has sought to address the matter through site allocations in Local Plan Part 2. A new Gypsy and Traveller Accommodation Assessment is currently being prepared for the new Local Plan but the final report has not yet been published. Given the uncertainty around Waverley Borough Council's future needs for gypsy and traveller accommodation, I do not consider we are in a position to assist in meeting the unmet need from Epsom and Ewell Borough at this time.

At the time of writing it is unclear as to the scope of any changes the new Government intends to make to the NPPF and standard method and this will impact upon Waverley Borough Council's future ability to meet its own housing requirement in the emerging Local Plan.

Please note that this is an officer response in liaison with the portfolio



holder for Planning.

Yours faithfully


Interim Planning Policy Manager

Contents

London Borough of Sutton: 27/09/23.....	2
Surrey County Council: 21/11/23.....	7
Royal Borough of Kingston Upon Thames: 14/05/24.....	10
Reigate & Banstead Borough Council: 21/05/24.....	14
Mole Valley District Council: 23/05/24.....	19
Surrey County Council: 11/06/24.....	24
London Borough of Sutton: 09/10/24.....	29
Elmbridge Borough Council: 17/10/24.....	33
London Borough of Sutton: 20/01/25.....	36
Mole Valley District Council: 27/01/25.....	39
Surrey County Council: 29/01/25.....	41
Elmbridge Borough Council: 30/1/25.....	44
Royal Borough of Kingston Upon Thames: 30/021/275.....	47
Reigate & Banstead Borough Council: 31/01/25.....	50

**Duty to Cooperate Meeting
LB Sutton and Epsom & Ewell BC**

27 September 2023

Attendees

[REDACTED] Principal Planning Officer, Epsom & Ewell BC
[REDACTED] Principal Planning Office Epsom & Ewell BC
[REDACTED] Strategic Planning Manager, LB Sutton
[REDACTED] Principal Transport Strategy & Policy Officer, LB Sutton
[REDACTED] Policy Officer, LB Sutton

Purpose of the Meeting

Initial meeting to identify progress on Local Plan review and evidence gathering, and to flag up potential strategic issues.

1. Local Plan Update

Sutton: Undertaking full review as current Local Plan adopted in 2018 prior to new standard method and new London Plan. Currently gathering evidence and preparing issues and preferred options document (I&PO). Aiming for Regulation 18 consultation in early 2024 and submission by June 2025.

Epsom & Ewell: Adopted plans: Core Strategy 2007, Area Action Plan Epsom Town Centre (2011), Development Management Policies Document (2015). Consulted on Regulation 18 Draft Local Plan Feb-Mar 2023 proposing potential Green Belt sites. Council paused the Local Plan process in Mar 2023, report to go to Full Council to un-pause.

2. Housing Need

Sutton: Commissioned Icenl to prepare Strategic Housing Market Local Housing Need Assessment. Relevant findings - Sutton part of the wider London housing market area with strong links to Surrey boroughs Epsom & Ewell and Reigate & Banstead.

Housing need using the standard method gives an uncapped figure of approx 2000 dwellings per annum, using the London Plan cap (and including 35% urban uplift) gives 886 pa. Current target in the adopted Local Plan is 469, with average delivery of 463 over the last 15 years. I&PO will consider a range of options. Large sites have been built out, current application for B&Q site for 1,100 units. London Plan encouraging small site delivery.

Epsom & Ewell: Housing Need Assessment published in 2022. Northern part of the borough has links to the London housing market. Core Strategy target is 181 dwellings pa, using the standard method the target is 576 pa. Should Draft Local Plan urban sites be developed would deliver 37% of need, including potential Green Belt sites this would rise to 56% of need. No scope for taking on other authorities' needs.

Latest document target is 5,400 for plan period, which is approx 300 pa. Looking to include windfall sites

Actions:

- **Further communication required on housing need and draft study to be shared.**

3. Industry and Employment Land Evidence

Sutton: Commissioned Stantec to prepare an Employment Land Review / Economic Needs Assessment. Study identified industrial need of 170,000sqm floorspace over the plan period this compares to 40,000sqm for the adopted plan period. Consultants concluded that multi-spaced provision was not viable and there was a lack of market interest. Office floorspace need identified as 60,000sqm over the plan period. Agree with projections for job growth, but not necessarily the translation to floorspace need. Lack of market demand

Epsom & Ewell: Main industrial area is the Longmead and Kiln Lane Estates. Evidence base study concluded industrial estates are very valuable to the local economy supporting a diverse range of businesses. A small number of parcels of land within the industrial estate have been promoted for development through the call for sites process for residential use. Evidence shows most of the land in the industrial area is not generally available for redevelopment for alternative uses so not deliverable. No scope for taking on other authorities' needs. Office floorspace need identified as 16,000sqm over plan period. Some office stock lost to residential. Some potential for new employment floorspace as part of town centre allocations.

Actions:

- **Further communication required on employment issues and draft study to be shared.**

4. Retail and Town Centres Evidence

Sutton: Commissioned Lambert Smith Hampton to prepare Retail and Town Centre study. Concluded there is a small surplus of comparison floorspace, though need for better quality space. Only a small need for convenience floorspace. Council has bought the St Nicholas Centre, plans to relocate the Civic Centre with a mix of town centre uses there.

Epsom & Ewell: Epsom town centre performing well, in light of the current retail market conditions. Evidence suggests the need to protect and consolidate existing provision.

Actions:

- **Draft Town Centres and Retail study to be shared.**

5. Green Belt Evidence

Sutton: Have assessed Green Belt and Metropolitan Open Land (same status as Green Belt in London Plan). No obvious releases identified in the Green Belt. Some sites proposed in the call for sites exercise, but not close to EEBC.

Epsom & Ewell: Some Green Belt sites were proposed for release in the consultation Draft Local Plan (Regulation 18) . [Green Belt technical note](#) formed part of the evidence base.

6. Transport Matters

Sutton:

- Transport study: Have not commissioned a full Transport Assessment at this stage, also looking to update TRICS analysis on site allocations.
- Tram: TfL paused Tram on affordability, but LBS will probably seek to continue the protection of the alignment for the first phase, uncertain on the second phase to the London Cancer Hub (LCH)
- Rail: £14 million Levelling up funding to improve the frequency on the Belmont - Epsom line
- Buses: 470 service to Epsom to be replaced by S2 and extended to Epsom General Hospital, majority of TfL vehicles serving Sutton to be electric by 2024
- Transport impact of the LCH: Key issue for E&E, R&B and Surrey CC at the last Local Plan inquiry. Council still committed to the delivery of LCH. Also possibility of a new hospital on site. Tight parking restrictions on site, employees will need to consider sustainable travel.
- Town centre car parks: over supply, Gibson Road part of Civic Centre redevelopment. Times Square car park coming to end of life.

Epsom & Ewell: A Transport Assessment (2021) was conducted for Reg 18 which focussed on the accessibility of potential sites, to assess which would minimise the need to travel by private car. This is consistent with Surrey CC's Local Transport Plan 4, which seeks significant carbon reductions. Looking at parking standards, and potential car-free development in Epsom town centre.

LBS need to consult with Surrey CC.

Actions:

- **Further communication required on transport issues.**

7. Gypsy and Traveller Evidence

Sutton: Gypsy and Traveller needs assessment to be done in-house, though paused as GLA doing London-wide study. However, this GLA study has been delayed so will need to pick up in-house work. Planning permission granted for extension to gypsy and traveller site in Woodcote.

Epsom & Ewell: GTAA (2022) has identified a need for 10 additional pitches for Gypsy & Travellers which meet the planning definition, which rises to 18 if including those who do not meet the definition. EEBC wrote to LBS in November 2022 to ask for assistance in meeting needs. The Reg 18 draft Local Plan included an allocation of 10 pitches within a Green Belt site allocation. There may still be a need for additional provision, which EEBC may need assistance with.

Actions:

- **LBS to share Gypsy and Traveller needs assessment when available**

8. Tall Buildings Study

Sutton: Commissioned Allies and Morrison to prepare a Tall Buildings Study. Focus for tall buildings Sutton town centre.

Epsom & Ewell:

Actions:

- **LBS to share tall buildings study when available**

9. Surface Water Flooding

Sutton: Commissioned Metis to prepare SFRA. Draft received, biggest source of flooding is surface water.

Epsom & Ewell: Surface water flooding is the main area of risk. Cross boundary issue in certain areas eg Worcester Park from surface water flooding. SFRA being commissioned and would like to engage with LBS on this.

Actions:

- **LBS to share draft SFRA**
- **EEBC to engage with LBS on their SFRA**

10. Education

Sutton: Adopted Local Plan had identified the need for three new primary and secondary schools. Have delivered one new primary at Hackbridge and one new secondary adjacent to the London Cancer Hub. One SEN school is under construction at Sheen Way and another proposed at Rosehill. Revised projections / reduced birth rates mean the pressure for additional schools is lower.

Epsom & Ewell: Have an identified need for SEN provision. Decreasing birthrates has eased pressure on primary provision, and the need for secondary places could potentially be met through existing provision. More engagement will take place with Surrey CC who are responsible for education place planning.

11. Care Homes

Sutton: Restrictive approach to care homes in current plan, new evidence suggests this approach may change.

Epsom & Ewell: Need for older people care homes/residential care set out in the Borough is set out in the This is also considered in the [Housing and Economic Development Needs Assessment \(HEDNA\)](#). Chapter 16 specifically considers housing needs for specific groups.

Officer questions for SCC in response to comments on the EEBC Draft Local Plan.

Background:

In response to SCC's representation to the EEBC Draft Local Plan (Reg. 18 version), A meeting was held on 21/11/23 to discuss specific elements of the response. 7 Questions were prepared in advance, some of which were dealt with in writing. At the beginning of the meeting officers from EEBC explained that in areas where there was less ambiguity about what was needed, it was deemed unnecessary to add these to the agenda. For example, policies on heritage and flooding were being reviewed and, once amended, would be sent to the relevant specialists at SCC for review. The following is list of questions discussed with background and a summary of the discussion:

1) How can we better embed active and sustainable travel across all town centre improvements?

Having reviewed transport policies we think they've gone as far as they can. The plan needs to be read as a whole and we suggest that transport policies do reflect sustainable transport principles. E.g. Policy S18 States *"Where new development is proposed, this will need to integrate with the existing local transport networks and be able to support a range of different modes of travel with emphasis on sustainable modes of transport including public transport, walking and cycling....."*

The town centre allocation sites were simply allocations. Though we have considered them in a joined-up way through the yet to be published masterplan (which includes highway improvements and alignment with the LCWIP), the Site Allocation policies in the local plan are just allocation policies. They'd be read in conjunction with policy S18 for when any applications.

Summary of discussion: *SCC understand that plan should be read as a whole, and satisfied with policies on sustainable transport. Is not requiring any specific policy change with regards to site allocations, but advising that we should continue to be mindful of the principles of LTP4 in our deliberations.*

1) Do you have any suggestions as to how we can incorporate "liveable neighbourhoods" and LTP4 into the plan?

LTP4 is a supporting document in policy S18. We could reference it explicitly in the main body of the policy. One issue this raises is whether LTP4 will expire before the local plan will. To get over this, we have tried to ensure the principles of sustainable transport are embedded in S18 among others. That way if the actual LTP4 document changes or updated and called something different, the principles it advocates for will still align with the Local Plan. The same can be said for the Liveable Neighbourhoods programme.

Summary of discussion: *As with question 1, SCC recognise that plan should be read as a whole and not are not requiring specific policy changes. Is satisfied that LTP4 is a supporting doc. in S18. Would prefer to keep it in.*

2) Do you have any views of economic development / town centre vitality for town centres in Surrey?

This would be good to know coming from the strategic authority, and would help us balance other comments you've made. For example, the suggestion that LTP4 might necessitate all car parks be removed as part of the town centre site allocations, and that no more should be provided has implications for the vitality of the town centre. Quite a bit of work has been done to get the right balance here. It would be nice to know whether that same balance has been considered in your response.

Summary of discussion: *Look to Surrey Place Ambition for further guidance. SCC Did not consider comments on town centre parking in relation to this.*

3) Do you have any other evidence that densities for SA8 and SA9 will be too high? And, does LTP4 say anything about what a preferred density should be around train stations?

This would help us balance the same issues – one of the sites you've raised concerns about (Ewell East) has a station next to it, hence slightly higher density.

Discussion: *No specific evidence but professional judgement applied. Recognise a potential contradiction highlighted, and that ultimately it will come down to the details of the scheme.*

4) Are you planning to commission any research on private early years education provision, to gauge what current capacity is?

It's difficult to know how to interpret the response on this. It suggested early years need will be generated (410 places) but we have no way of knowing whether the increased need can be accommodated. One possible solution to this could be the presumption in favour of proposals for early years education across the board, but not sure this would be robust enough.

Discussion: *Challenging issue given that most provision is through the private sector. SCC recommended EEBC consider Elmbridge's Reg 19 policy on infrastructure, which references early years.*

5) Can you clarify the status of the most recent education place planning/SEND forecasts and specifically, the impact of potential larger site allocations?

The Education Place Planning forecasts 22/23 provided as part of the response were updated in Autumn 2022 and would therefore be based on the information/trajectories submitted by EEBC in April/May 2022. As this was prior to the publication of the Draft Local Plan regulation 18, the forecasts would not reflect the level of growth identified in the spatial strategy. There are some significant potential allocations which may increase demand in certain localities.

The information/trajectories submitted by EEBC in April/May 2023 do reflect the latest Draft Local Plan position. Have the education/SEND forecasts been updated for 23/24? What is the impact of the larger potential allocations & would any changes need to be made to our education infrastructure policy DM14 or site allocation policies?

Discussion: *Revised forecasts are not yet available, which would reflect the Regulation 18 spatial strategy. SCC will inform EEBC when these are ready. SCC would be happy to meet with EEBC to discuss these along with the potential impact from larger sites.*

6) Do you have any more specific suggestions about how we can better embed "health and well being" into our Local Plan?

There is some debate within our team about how to address health and wellbeing in the plan. It's clearer how we can make strategic connections between policies that, combined, all impact on

health and wellbeing. But there is less agreement between us about the benefits of requiring Health Impact Assessments (HIAs) for planning applications, against the potential additional burden on applicants (we are aware of government guidance as well). Is your team able to provide any further examples about the benefits of HIAs for planning applications?

Also, with regards to comments about requiring HIAs on the Local Plan. It's been suggested that this will be covered in the SEA/SA, do you agree?

Discussion: [REDACTED] *will be attending a workshop on this and will therefore be in a position to advise afterwards.*

Royal Borough of Kingston Upon Thames: 14/05/24

Duty to Cooperate: Meeting minutes

Royal Borough of Kingston Upon Thames and Epsom & Ewell BC

Meeting date 14/5/24

Attendees

██████████ EEBC - Planning Policy Manager

██████████ EEBC - Principal Planning Policy Officer

██████████ RBK - Planning Policy Manager

██████████ RBK - Planning Policy Officer

1) Local Plan Update

EEBC: Consulted on Reg 18 in February to March 2023. Council paused the Local plan process in March and un-paused in November 2023. Currently working on evidence base and aiming for a Reg 19 consultation in early 2025. Seeking to submit by the transitional deadline of 30 June 2025.

RBK: Three rounds of engagement at Regulation 18 stage to date, with the most recent being a First Draft Local Plan (Nov 2022 to Feb 2023). Aiming for a Reg 19 in autumn 2024, with submission by the transitional deadline of 30 June 2025.

2) DTC Update

EEBC: Consulted upon a DTC framework, which sought to identify DTC partners and strategic cross boundary issues. Use the framework to document engagement on issues and will seek to use this to inform a Statement of Compliance and to draft SOCG.

3) DTC framework (Issues identified)

Housing Needs/Green Belt

Both RBK & EEBC have previously engaged on this issue. Both authorities are in the same Housing Market Area.

EEBC: EEBC wrote to RBK in November 2022 when work on the first iteration of the Land Availability Assessment (LAA) was largely complete. This identified that the urban area could potentially accommodate 3,849 dwellings or 37% of housing need as identified through the standard method. The Reg 18 consultation followed in Feb/March 2023 which identified a strategy which sought to deliver approximately 3,700 new dwellings in the urban area and 2,175 through the release of just under 3.6% of the borough's Green Belt. This would equate to 56% of the standard method.

RBK responded to the Reg 18 consultation and raised concerns that the level of unmet need will place additional pressure on adjoining borough's housing supply.

The Epsom and Ewell LAA has now been updated, which involved:

- Another Call for Sites exercise (undertaken alongside the Reg 18 Local Plan consultation in 2023)
- Contacting all landowners in 2022 LAA again to confirm availability (removing sites where unconfirmed)
- Reviewing 2022 LAA sites against any updated evidence (e.g. changes to Environment Agency flood zones)
- Reviewing capacities of individual sites (seeking to optimise yields)
- Reviewing current planning applications/pre-apps
- Updated windfall allowance – to include an allowance for small (1-4) and medium (5-19) windfalls
- Updating the trajectory

Headline LAA findings: 38 urban sites are considered developable/deliverable, which could meet 33% of standard method. The potential yield from all Green Belt sites promoted for development would be 46% of standard method – still therefore an overall shortfall even if all potential Green Belt sites were to be included.

RBK: RBK engaged with EEBC in December 2022 to seek assistance in meeting some or all of its shortfall for housing and Gypsy and Traveller accommodation. EEBC responded outlining the situation as set out above, confirming it is unable to help.

Work on the LAA is ongoing and a further Green Belt review is to be carried out prior to the Reg 19 consultation. A previous Green Belt study found the Green Belt to be performing well against the NPPF tests and the current Council position is that Green Belt sites are unlikely to be included for development in the Local Plan.

Outcome: Agreed beneficial to share LAAs and talk through approaches. Agreed that the existing position of being unable to assist in meeting unmet needs from neighbouring authorities still stands.

Gypsy & Traveller Accommodation

Both RBK & EEBC have previously engaged on this issue.

EEBC: EEBC wrote to RBK in November 2022 to seek assistance in meeting Gypsy and Traveller needs, which at the time was for ten pitches. Subsequently we consulted on our Reg 18 which included a proposed allocation for ten pitches within one of the larger potential Green Belt site allocations. Following the change in definition of a Gypsy and Traveller, the need for additional pitches has increased to 18 (as identified in the GTAA 2022). There is therefore likely to be an unmet need.

RBK: RBK's GTAA 2018 identifies a need for 44 pitches. Current provision in the borough comprises 18 authorised pitches and 15 unauthorised pitches, which are mostly located within the Green Belt. Anticipating there will be unmet need.

Outcome: Agreed that each authority is unlikely to be able to assist in meeting unmet needs.

Flood Risk (principally from surface water)

EEBC: The main cause of flood risk in the Borough is from surface water flooding. An updated SRFA is currently being undertaken and the level 1 draft (strategic) is expected soon. This will be followed by the level 2 draft (sites). EEBC also have a Surface Water Management Plan (SWMP) which is over 10 years old. The updated SFRA will take account of this. The LLFA for EEBC is Surrey County Council.

RBK: SFRA is around two years old, and work is being undertaken on a new level 2 (sites) report. Kingston is its own LLFA with dedicated flood officers and also have a SWMP which was produced in 2011.

Outcome: EEBC will share the SFRA level 1 draft once received.

Improving sustainable transport choices, particularly in association with new development

RBK had responded to EEBC's Reg 18 consultation raising concerns in relation to a few of the potential site allocations (SA5 West Park, SA6 & 7 Horton & Chantilly & SA9 Hook Road Arena) which sit within 'reasonable proximity' of the RBK borough boundary. These were scored under the Reg 18 Transport Assessment as having poor access to a number of key criteria, including access to railway stations. The concern is that development of these sites, through the high likelihood for car dependency, will add pressure to the local road network including the key stress points of Hook and Tolworth junctions of the A3. Hook junction is a strategic bus transport route through RBK, and any further traffic increase could potentially impact sustainable transport within RBK. Hook Road Arena and Horton Farm are likely to have particular impact.

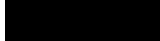
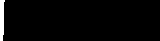

EEBC: Recognise RBK's concerns. A Transport Assessment (TA) is currently being undertaken by Surrey County Council to support the Regulation 19 version of the Local Plan, which will identify the impact on the transport network from the growth in the proposed submission Local Plan. EEBC have recently engaged with RBK to identify significant developments/schemes within RBK which should be taken into account in the TA. It is anticipated that the TA will highlight any potential issues with the transport network and mitigation can then be considered where needed.

4) Other issues

EEBC will commence drafting a SOCG and send through to RBK for comment.

**Duty to Cooperate: Meeting minutes
Reigate & Banstead BC and Epsom & Ewell BC
Meeting date 21/5/24**

Attendees

 EEBC - Planning Policy Manager
 EEBC - Principal Planning Policy Officer
 RBBC - Planning Policy Manager

1) Local Plan Update

EEBC: Consulted on Reg 18 in February to March 2023. Council paused the Local plan process in March and un-paused in November 2023. Currently working on evidence base and aiming for a Reg 19 consultation in early 2025, subject to approval by Full Council in December 2024. Seeking to submit by the transitional deadline of 30 June 2025.

RBK: Work has commenced on a new Local Plan and evidence gathering is underway. Numerous studies completed, some underway and some to be commissioned. Indicative timetable identifies two rounds of consultation in Aug/Sept 2025 and Oct/Nov 2026, submission in August 2027 with adoption in July 2028. Existing Core Strategy (2014) has been subject to a recent review (March 2024), which concluded that the policies remain up to date and effective for managing development within the borough.

2) DTC Update

EEBC: Consulted upon a DTC framework, which sought to identify DTC partners and strategic cross boundary issues. Use the framework to document engagement on issues and will seek to use this to inform a Statement of Compliance and to draft SOCG.

3) DTC framework (Issues identified)

Housing Needs/Green Belt

EEBC have previously engaged with RBBC on this issue.

In response to consultation on the DTC framework, RBBC stated that 'although RBBC is maintaining a five-year housing land supply (June 22), like Epsom & Ewell, the borough is heavily constrained and as such is unable to meet unmet housing need for Epsom & Ewell.'

EEBC wrote to RBBC in November 2022 when work on the first iteration of the LAA was largely complete. Situation was that the urban area could potentially accommodate 3,849 dwellings or 37% of the calculated housing need. This was followed by the Regulation 18 consultation in Feb/March 2023

which identified the Council's preferred strategy which sought to deliver approximately 3,700 new dwellings in the urban area and 2,175 through the release of just under 3.6% of the borough's Green Belt. This would equate to 56% of the standard method.

RBBC responded to the Regulation 18 consultation and again confirmed that they would be unable to accommodate part of any other authorities housing need.

The Epsom and Ewell LAA has now been updated, which involved:

- Another Call for Sites exercise (undertaken alongside the Reg 18 Local Plan consultation in 2023)
- Contacting all landowners in 2022 LAA again to confirm availability (removing sites where unconfirmed)
- Reviewing 2022 LAA sites against any updated evidence (e.g. changes to Environment Agency flood zones)
- Reviewing capacities of individual sites (seeking to optimise yields)
- Reviewing current planning applications/pre-apps
- Updated windfall allowance – to include an allowance for small (1-4) and medium (5-19) windfalls
- Updating the trajectory

Headline LAA findings (subject to revision): 38 urban sites are considered developable/deliverable, which could meet 33% of standard method. The potential yield from all Green Belt sites promoted for development would be 46% of standard method – still therefore an overall shortfall even if all potential Green Belt sites were to be included.

RBBC: A Call for Sites exercise is about to commence which will inform the production of a LAA. Anticipating limited availability of sites. Most recent five-year housing land supply position was for 6.43 years of supply (at 1 April 2024) against the Core Strategy target of 460 homes per annum, plus a 5% buffer.

Outcome: RBBC unlikely to be able to assist in meeting needs. EBBC will formally write to confirm the position.

Gypsy & Traveller Accommodation

EEBC have previously engaged with RBBC on this issue.

EEBC wrote to RBK in November 2022 to seek assistance in meeting Gypsy and Traveller needs, which at the time was for ten pitches. Subsequently we consulted on our Reg 18 which included a proposed allocation for ten pitches within one of the larger potential Green Belt site allocations. Following the change in definition of a Gypsy and Traveller, the need for additional pitches has increased to 18 (as identified in the GTAA 2022. There is therefore likely to be an unmet need.

RBBC responded to the Regulation 18 consultation and stated that they would be unable to accommodate part of any other authorities needs due to local constraints. Existing GTAA is from 2017 and RBBC intend to commission a new one. The Call for Sites exercise which is due to commence will be seeking sites for Gypsy & Travellers. Consider it unlikely RBBC will be able to assist in meeting and needs arising from EEBC.

Outcome: RBBC unlikely to be able to assist in meeting needs. EEBC will formally write to confirm the position.

Flood Risk (principally from surface water)

For EEBC, the main cause of flood risk in the Borough is from surface water flooding. An updated SRFA is currently being undertaken and the level 1 draft (strategic) is expected soon. This will be followed by the level 2 draft (sites). EEBC also have a Surface Water Management Plan (SWMP) which is over 10 years old. The updated SFRA will take account of this.

RBBC's SFRA dates from 2017 and was jointly produced with Mole Valley DC and Elmbridge BC. RBBC intend to commission a new one.

Outcome: No significant cross boundary issues identified to date. Will share evidence with each other as it emerges.

Improving sustainable transport choices, particularly in association with new development

EEBC are currently undertaking a Transport Assessment, which will identify the impact on the transport network and subsequently identify mitigation where required. Recently engaged with RBBC to identify significant developments/schemes which should be taken into account in our TA.

RBBC have not raised any issues on transport. Reg 18 response suggested including clear cycle and pedestrian routes for SA6 (Horton Farm).

Outcome: No significant cross boundary issues identified to date. Will share evidence with each other as it emerges.

Meeting education needs, including Special Educational Needs and Disabilities (SEND)

For EEBC the most recent SCC educational needs forecasts, which are based on the growth scenario set out in the draft Local Plan (Regulation 18) consultation found that the overall demand for reception Year places is expected to reduce in E&E, while the demand for year 7 places is expected to

increase. This is mainly due to a drop in the birthrate, while the previous increased birthrate pupils are now moving onto/progressing through secondary school. Currently primary schools are close to capacity, so housing developments could result in an additional need for places in higher year groups of primary, should in-year applications for admission increase. Any additional demand for secondary school places is expected to be met through bulge classes in existing schools. SCC have also recently identified that any future needs are likely to be for pupils with additional needs or post 16.

EEBC have recently requested forecasts from SCC to inform the Reg 19 Local Plan.

There is some cross border movement both inward and outward between RBBC & EEBC. This is mainly for secondary schools Glyn/Rosebery in EEBC and The Beacon in RBBC.

Outcome: No significant cross boundary issues identified to date. Will share evidence with each other as it emerges.

Meeting healthcare needs

EEBC have been engaging with the Surrey Heartlands Clinical Commissioning Group (CCG) to identify the impact of the draft Local Plan on healthcare infrastructure. This has been via the SidM model. The CCG have indicated there is likely to be a requirement for circa 800sqm of additional primary care floorspace to meet the needs of the incoming population. Nothing raised for secondary healthcare.

Linkages between EEBC & RBBC – RBBC residents using Epsom hospital.

Outcome: No significant cross boundary issues identified to date. Will share evidence with each other as it emerges.

The horse racing industry

RBBC response to the Regulation 18 consultation noted that the Equestrian Protection Zone abuts Reigate and Banstead and queried whether this raises any further wider protections on the visual landscape.

Within EEBC the area to the south and east of Langley Vale is designated as AGLV. The draft policy seeks to strike the balance between supporting the racing industry and protecting the countryside. RBBC advised EEBC to remain aware of potential further national landscape designations. There are no racehorse training establishments (RTEs) within RBBC.

The Jockey Club have commented on the draft equestrian policy/zone, which EEBC will be taking account of.

Outcome: EEBC will remain vigilant for any changes to/new landscape designations

4) Other issues

EEBC will commence drafting a SOCG and send through to RBBC for comment.

Mole Valley District Council: 23/05/24

Duty to Cooperate: Meeting minutes Mole Valley DC and Epsom & Ewell BC Meeting date 23/5/24

Attendees

██████████	EEBC - Planning Policy Manager
██████████	EEBC - Principal Planning Officer
██████████	MVDC - Planning Policy Manager
██████████	MVDC - Planning Policy Officer

1) Local Plan Update

EEBC: Consulted on Reg 18 in February to March 2023. Council paused the Local plan process in March and un-paused in November 2023. Currently working on evidence base and aiming for a Reg 19 consultation in early 2025, subject to approval by Full Council in December 2024. Seeking to submit by the transitional deadline of 30 June 2025.

MVDC: The Local Plan was submitted for examination in February 2022. Consultation on the main modifications has now closed with the responses and Council comments being sent back to the inspector. Now waiting for the Inspectors final report.

2) DTC Update

EEBC: Consulted upon a DTC framework, which sought to identify DTC partners and strategic cross boundary issues. Use the framework to document engagement on issues and will seek to use this to inform a Statement of Compliance and to draft SOCG.

3) DTC framework (Issues identified)

Housing Needs/Green Belt

EEBC and MVDC have previously engaged on this issue. Both authorities are in the same HMA.

EEBC wrote to MVDC in November 2022 when work on the first iteration of the LAA was largely complete. Situation was that the urban area could potentially accommodate 3,849 dwellings or 37% of the calculated housing need. This was followed by the Regulation 18 consultation in Feb/March 2023 which identified the Council's preferred strategy which sought to deliver approximately 3,700 new dwellings in the urban area and 2,175 through the release of just under 3.6% of the borough's Green Belt. This would equate to 56% of the standard method.

MVDC confirmed they were unable to assist in meeting EEBC's potential unmet need in December 2022 and again through their response to the Regulation 18 consultation. MVDC submitted their local plan for examination in February 2022, which makes provision for approximately 77% of their housing need. EEBC and MVDC have signed a Statement of Common Ground (2021), which established that neither authority was in a position to accommodate each other's unmet needs.

The Epsom and Ewell LAA has now been updated, which involved:

- Another Call for Sites exercise (undertaken alongside the Reg 18 Local Plan consultation in 2023)
- Contacting all landowners in 2022 LAA again to confirm availability (removing sites where unconfirmed)
- Reviewing 2022 LAA sites against any updated evidence (e.g. changes to Environment Agency flood zones)
- Reviewing capacities of individual sites (seeking to optimise yields)
- Reviewing current planning applications/pre-apps
- Updated windfall allowance – to include an allowance for small (1-4) and medium (5-19) windfalls
- Updating the trajectory

Headline LAA findings (subject to revision): 38 urban sites are considered developable/deliverable, which could meet 33% of standard method. The potential yield from all Green Belt sites promoted for development would be 46% of standard method – still therefore an overall shortfall even if all potential Green Belt sites were to be included.

Outcome: Position remains the same as stated in the MVDC/EEBC SOCG – both authorities are unable to assist in meeting needs arising from another authority. To formally confirm this, EEBC will write to MVDC.

Gypsy & Traveller Accommodation

Both authorities agreed in the 2001 EEBC/MVDC SOCG to seek to meet their own need for additional Gypsy and Traveller pitch provision.

Since the signing of this EEBC commissioned a GTAA (2022) which identified a need for ten pitches for those who met the government's definition of a Gypsy and Traveller and for eight pitches for those who did not meet the definition. EEBC wrote to MVDC in November 2022 to seek assistance in meeting Gypsy and Traveller needs. MVDC confirmed they were unable to assist. Subsequently, EEBC's Reg 18 draft Local Plan included a proposed allocation for ten pitches within one of the larger potential Green Belt site allocations. Following the change in definition of a Gypsy and Traveller, the need for additional pitches has increased to 18 There is therefore likely to be an unmet need.

The change in definition has also resulted in an increase in MVDC's Gypsy and Traveller need from 32 pitches to 52. MVDC has allocated some pitches within strategic sites and are seeking ways to address the additional need, which may involve intensification of existing sites. It is unlikely that further need from other authorities can be accommodated.

Outcome: MVDC unlikely to be able to assist in meeting needs. EBBC will formally write to confirm the position.

The Horse Racing Industry

Horse racing plays an important role in both authorities' local economies, and both are aware of the challenges it faces, particularly from the loss of facilities to other uses. The 2001 EEBC/MVDC SOCG stated a commitment to working "with the Jockey Club and Jockey Club Estates to ensure that racehorse training in Epsom & Ewell and Mole Valley has the conditions to thrive." The SOCG also stated that EEBC will consider the merits of extending MVDC's new Racehorse Training Zone, a designation within which horse racing stables and gallops are safeguarded, into the Borough.

EEBC carried out a Regulation 18 Local Plan consultation in February/March 2023, which contained draft policy DM6: Equestrian and horse racing facilities. This policy is broadly supportive of the development of new equestrian facilities and identified Equestrian Protection Zones where losses of equestrian facilities would be resisted.

MVDC responded to the Regulation 18 consultation and were supportive of the policy approach and its consistency with the proposed horseracing training zone in the emerging MVDC Local Plan. It was requested that EEBC's policy be informed by the advice of the Jockey Club, as had happened with MVDC. MVDC also asked for confirmation that the turnout fields associated stables are incorporated within the protected areas.

The Jockey Club have responded to EEBC's Reg 18 and EEBC will be discussing this further with the Jockey Club.

Outcome: EEBC and MVDC are still aligned in their position on this issue.

Improving sustainable transport choices, particularly in association with new development

EEBC are currently undertaking a Transport Assessment, which will identify the impact on the transport network and subsequently identify mitigation where required to support the Reg 19 Local Plan. Recently engaged with MVDC to identify significant developments/schemes which should be taken into account in our TA.

MVDC responded to the Regulation 18 consultation and stated an interest in the potential traffic impact on the road network, including the A24 southbound, Junction 9 of the M25 and Headley Road. It was suggested that infrastructure

work should also consider cycling links from Epsom into Ashted in Mole Valley.

National Highways had a holding objection to Mole Valley's Local Plan relating to Junction 9 of the M25, which has now been removed. A study commissioned by MVDC found there to be existing issues with this junction, which National Highways and SCC are likely to jointly address in the future.

SCC have commenced work on EEBCs LCWIP. Currently at the high-level interventions stage, which has identified the Epsom to Ashted route as one of the cycle corridors for improvement. Feasibility studies are yet to be carried out. MVDC suggested ensuring linkages with Mole Valley's LCWIP as this is not always a given.

Outcome: EEBC will share results of the Transport Assessment and keep MVDC informed should any new issues be identified.

Meeting education needs, including Special Educational Needs and Disabilities (SEND)

For EEBC the most recent SCC educational needs forecasts, which are based on the growth scenario set out in the draft Local Plan (Regulation 18) consultation found that the overall demand for reception Year places is expected to reduce in E&E, while the demand for year 7 places is expected to increase. This is mainly due to a drop in the birthrate, while the previous increased birthrate pupils are now moving onto/progressing through secondary school. Currently primary schools are close to capacity, so housing developments could result in an additional need for places in higher year groups of primary, should in-year applications for admission increase. Any additional demand for secondary school places is expected to be met through bulge classes in existing schools. SCC have also recently identified that any future needs are likely to be for pupils with additional needs or post 16.

EEBC have recently requested forecasts from SCC to inform the Reg 19 Local Plan.

The 2001 EEBC/MVDC SOCG stated:

"There are significant linkages between the two authorities with

- (i) the admissions policy at St Andrews School in Ashted favouring children attending feeder primary schools, several of which are outside Mole Valley;
- (ii) much of Ashted is within the catchment area of Rosebery Girls School in EEBC;
- (iii) the most logical college-based, post-16 education for many Mole Valley teenagers being North East Surrey College of Technology (FE college in Ewell); and,
- (iv) the nearest tertiary education for many Mole Valley residents being the University for the Creative Arts in Epsom.

Within the SOCG the authorities agreed that: planning for education will require discussions across the two local authority areas with the involvement of Surrey County Council's Pupil Place Unit. SCC are currently suggesting that the primary and secondary pupil place growth arising from the MVDC Local Plan can be accommodated within the existing school estate."

Outcome: EEBC will inform MVDC should the updated education forecasts identify any new issues. The linkages and statements agreed in the 2021 SOCG remain relevant.

Meeting healthcare needs

EEBC have been engaging with the Surrey Heartlands Clinical Commissioning Group (CCG) to identify the impact of the draft Local Plan (Reg 18) on healthcare infrastructure. This has been via the SidM model. The CCG have indicated there is likely to be a requirement for circa 800sqm of additional primary care floorspace to meet the needs of the incoming population. Nothing raised for secondary healthcare.

EEBC intend to use the SidM model to reflect Reg 19 Local Plan scenario, which will be sent to the CCG for comment.

The 2001 EEBC/MVDC SOCG established that there are significant linkages between the authorities in terms of healthcare provision. St Stephen's Practice has GP surgeries in both areas, Epsom residents use Leatherhead Community Hospital and Mole Valley residents use Epsom General Hospital. Within the SOCG the authorities agreed to continue discussions with the CCG and the Surrey Downs Integrated Care Partnership. MVDC are allocating sites for enhanced healthcare provision in both Ashted and Leatherhead.

Outcome: EEBC will inform MVDC should any new issues be identified by the CCG from future forecasts. The linkages and statements agreed in the 2021 SOCG remain relevant.

4) Other issues

EEBC will commence drafting a SOCG and send through to MVDC for comment.

Surrey County Council: 11/06/24

Duty to Cooperate: Meeting minutes
Surrey County Council and Epsom & Ewell BC
Meeting date 11/6/24

Attendees

EEBC - Planning Policy Manager
EEBC - Principal Planning Policy Officer
SCC - Spatial Planning and Policy Manager
SCC - Principal Planning Officer
SCC - Principal Planning Officer

1) Local Plan Update

EEBC consulted on the draft Local Plan Reg 18 in February to March 2023. Council paused the Local plan process in March and un-paused in November 2023. Currently working on evidence base and aiming for a Reg 19 consultation in early 2025, subject to approval by Full Council in December 2024. Seeking to submit by the transitional deadline of 30 June 2025.

2) DTC Update

EEBC consulted upon a DTC framework, which sought to identify DTC partners and strategic cross boundary issues. Use the framework to document engagement on issues and will seek to use this to inform a Statement of Compliance and to draft SOCG.

SCC also suggested the inclusion of some additional issues:

Biodiversity

Infrastructure (education, transport but also waste & community facilities)

Minerals & waste

Heritage

This meeting provides an opportunity for EEBC to update SCC's Strategic Planning team on EEBC's progress with the Local Plan.

3) DTC framework (Issues identified)

Housing Needs/Green Belt

The draft Local Plan Reg 18 consultation (Feb/March 2023) identified a strategy which sought to deliver approximately 3,700 new dwellings in the urban area and 2,175 through the release of just under 3.6% of the borough's Green Belt. This would equate to 56% of the standard method.

LAA has now been updated (still currently draft), which involved:

- Another Call for Sites exercise
- Contacting all landowners in 2022 LAA again to confirm availability (removing sites where unconfirmed)

- Reviewing 2022 LAA sites against any updated evidence (e.g. changes to EA flood zones)
- Reviewing capacities of individual sites (seeking to optimise yields)
- Reviewing current planning applications/pre-apps
- Updated windfall allowance – to include an allowance for small (1-4) and medium (5-19) windfalls
- Updating the trajectory

Headline LAA findings (subject to revision): 38 urban sites are considered developable/deliverable, which could meet 33% of standard method. The potential yield from all Green Belt sites promoted for development would be 46% of standard method – still therefore an overall shortfall even if all potential Green Belt sites were to be included. EEBC intends to formally write again to relevant authorities to seek assistance in meeting housing needs.

Gypsy & Traveller Accommodation

The draft Local Plan Reg 18 included a proposed allocation for ten pitches within one of the larger potential Green Belt sites. Since the change in definition of a Gypsy and Traveller EEBC's need for additional pitches has increased to 18. There is therefore likely to be an unmet need. EEBC intends to formally write again to relevant authorities to seek assistance in meeting Gypsy and Traveller needs.

Current Gypsy and Traveller provision within EEBC comprises two public sites, which are both managed by SCC. It was queried whether SCC would manage an additional site within the borough should the potential Green Belt allocation be delivered. Advised that EEBC should email this request so it can be addressed by the relevant department.

SCC have been working with the Boroughs and Districts to address transit provision at the county level. EEBC requested an update on this. *Update provided by SCC via email immediately following the meeting.*

Flood Risk (principally from surface water)

The main cause of flood risk in the Borough is from surface water flooding.

SCC responded to the Regulation 18 consultation. It was suggested that the SFRA needed to be updated to represent the new NPPF and PPG requirements for the sequential test. Also suggested that areas at risk from surface water flooding be included on the map alongside the fluvial flood risk zones. Amendments to the policy wording were also suggested.

EEBC are currently undertaking an updated SFRA and SCC have been & will continue to be engaged as part of this study. A level 1 draft has been sent to SCC for comment.

SCC advised ensuring the Environment Agency is satisfied with the SFRA to avoid objections later in the process.

Improving sustainable transport choices, particularly in association with new development

EEBC has worked with SCC on the Transport Accessibility of Sites Assessment (complete), and work is currently underway on the Reg 19 Transport Assessment which will identify the impact on the transport network and subsequently identify mitigation where required.

The Epsom & Ewell LCWIP is progressing, and work will be commencing on the Local Street Improvements initiative. EEBC is also engaging with SCC through updates to the Infrastructure Delivery Plan (IDP) – schemes are likely to emerge from the LCWIP & LSIs.

SCC responded to the draft Local Plan Reg 18 consultation and provided general, and policy specific comments. General support was given for the overarching transport policy S18 & its alignment with LTP4.

Comments included - ensuring active and sustainable travel is embedded across all town centre improvements/developments. This was discussed at a previous meeting with EEBC/SCC in November 2023. SCC were not requiring any specific policy changes but just advised that EEBC should continue to be mindful of the principles of LTP4. Agreed that LTP4 should continue to be referenced as a supporting document.

Comments were made on the site allocations which involved the loss/reprovision of parking, with the general theme being that LTP4 promotes a policy of demand management for cars and thus does not view the loss of car parking as a constraint. Concerns were raised about providing car parking facilities in already heavily congested areas that are near to public transport facilities. EEBC have since undertaken a parking study, which assesses the utilisation of the Epsom Town Centre public car parks (study not yet published). This will be used to inform the Local Plan.

EEBC requested an update on the Surrey Place Ambition, Epsom to Leatherhead corridor. SCC advised the strategy has been refreshed and the Epsom to Leatherhead corridor is sub area 6. Suggested including a reference to the strategy in the Local Plan.

Meeting education needs, including Special Educational Needs and Disabilities (SEND)

The most recent SCC educational needs forecasts for Epsom & Ewell, which are based on the growth scenario set out in the draft Local Plan (Regulation 18) consultation found that the overall demand for reception Year places is expected to reduce in E&E, while the demand for year 7 places is expected to increase. This is mainly due to a drop in the birthrate, while the previous increased birthrate pupils are now moving onto/progressing through secondary school. Currently primary schools are close to capacity, so housing

developments could result in an additional need for places in higher year groups of primary, should in-year applications for admission increase. Any additional demand for secondary school places is expected to be met through bulge classes in existing schools. SCC have also recently identified that any future needs are likely to be for pupils with additional needs or post 16.

EEBC has provided trajectories to SCC following the annual request for data and have taken into account the advice given following meetings with SCC Education Place Planning team. EEBC has also requested forecasts based on the potential Reg 19 Local Plan scenario. The Education Place Planning Teams advised that the model will be updated in September and EEBC can request a re-run of forecasts then if required.

Meeting healthcare needs

SCC responded to the draft Local Plan Reg 18 consultation. The SCC Public Health team recommended that a Health Impact Assessment (HIA) is conducted to help mitigate the negative impacts and maximise the positive impacts of the plan. It was also recommended that a policy is included requiring developers to submit a HIA as part of the application process. EEBC further discussed this response with SCC on 21/11/23 and it was suggested that this requirement could be targeted towards areas where there are health inequalities. SCC will be producing a template policy for HIAs.

EEBC have been engaging with the Surrey Heartlands Clinical Commissioning Group (CCG) to identify the impact of the draft Local Plan (Reg 18) on healthcare infrastructure. This has been via the SidM model. The CCG have indicated there is likely to be a requirement for circa 800sqm of additional primary care floorspace to meet the needs of the incoming population. Nothing raised for secondary healthcare.

EEBC intend to use the SidM model to reflect Reg 19 Local Plan scenario, which will be sent to the CCG for comment.

4) Other issues

Biodiversity

BNG is now in place. There is now a greater understanding of this than at the time of writing the draft Local Plan Reg 18 policy. As such the policy will evolve. In the response to the Reg 18, SCC suggested considering a 20% requirement for BNG. EEBC intend to viability test this. SCC also suggested EEBC take account of the Local Nature Recovery Strategy.

Infrastructure

EEBC has recently engaged with SCC on infrastructure via an update to the IDP. Emerging evidence base documents will be used to inform infrastructure needs (e.g. transport assessment & education forecasts). EEBC will be updating the IDP to support the Reg 19 Local Plan. EEBC now also have

Community Infrastructure Levy (CIL) governance arrangements in place which involve an annual update of the IDP.

Heritage

Detailed comments were received on the draft Local Plan reg 18 heritage policies from both SCC and Historic England. EEBC have been and will continue to work with both organisations on the Reg 19 version of these policies to assess the issues.

SCC owned sites

Four sites had been submitted by SCC through the Local Plan process. These are set out below with an update from EEBC:

Site: Grafton Stables, Worcester Park

Update: Site discounted in the Land Availability Assessment due site being covered by a Tree Protection Order (TPO) area

Site: Land At The Former Auriol Junior School Playing Field And Land At 2nd Cuddington (Rowe Hall), Off Salisbury Road.

Update: SCC reconsulting on an outline application (April 24) for Extra Care Accommodation, comprising self-contained apartments, staff and communal facilities, and associated car parking (Class C2); the reprovision of a revised Scouts Hut curtilage.

Site: Land at The Sycamore Centre, 14 West Hill

Update: Site submitted as part of Call for Sites exercise in 2017. Planning application (March 21) approved for the erection of a new two storey building for use as a Children's Home. Development now complete.

Site: Karibu, Wells House, Spa Drive

Update: Planning permission granted (March 24) for Change of use from residential children's home (Class C2) to education use (Class F1).


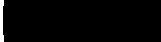
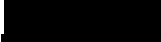

Statement of Common Ground

EEBC will commence drafting a SOCG and send through to SCC for comment.

London Borough of Sutton: 09/10/24

Duty to Cooperate: Meeting minutes
London Borough of Sutton and Epsom & Ewell BC
Meeting date 9/10/24

Attendees

 EEBC - Planning Policy Manager
 EEBC - Principal Policy Planner
 LBS - Planning Policy Manager
 LBS - Principal Policy Officer

1) Update on position with Local Plan

EEBC: Consulted on Reg 18 in February to March 2023. Council paused the Local plan process in March and un-paused in November 2023. Currently aiming for a Reg 19 consultation in early 2025, subject to approval by LPPC on 20 November and Full Council in December 2024.

Sutton: Current Local Plan adopted in 2018 prior to new standard method and new London Plan. Consulted on a Regulation 18 from August to September 2024. Consultation commenced just prior to the consultation on proposed changes to the NPPF. Uncertainty as to the timing of Regulation 19.

2) DTC update

EEBC: Consulted upon a DTC framework, which sought to identify DTC partners and strategic cross boundary issues. Use the framework to document engagement on issues and will seek to use this to inform a Statement of Compliance and to draft SOCG.

Previous DtC meeting was in September 2023 (initiated by LBS)

3) DTC framework (Issues identified)

Housing Needs/Green Belt

Both LBS & EEBC have previously engaged on this issue.

EEBC: Housing Need Assessment published in 2022. Northern part of the borough has links to the London housing market but not in the same HMA. The existing standard method figure for EEBC is 573 units per annum. The proposed changes to the standard method results in a figure of 817 units per annum.

EEBC wrote to LBS in November 2022 when work on the first iteration of the LAA was largely complete. This identified that the urban area could potentially accommodate 3,849 dwellings or 37% of housing need as identified through

the existing standard method. The Reg 18 consultation followed in Feb/March 2023 which identified a strategy which sought to deliver approximately 3,700 new dwellings in the urban area and 2,175 through the release of just under 3.6% of the borough's Green Belt. This would equate to 56% of the standard method.

The Epsom & Ewell LAA has now been updated, which involved:

- Another Call for Sites exercise
- Contacting all landowners in 2022 LAA again to confirm availability (removing sites where unconfirmed)
- Reviewing 2022 LAA sites against any updated evidence (e.g. changes to EA flood zones)
- Reviewing capacities of individual sites (seeking to optimise yields)
- Reviewing current planning apps/pre-apps
- Updated windfall allowance – including an allowance for small (1-4) and medium (5-19) windfalls
- Updating the trajectory

Headline LAA findings: 33 urban sites are considered developable/deliverable, which could meet 34% of standard method. The potential yield from all Green Belt sites promoted for development would be 46% of standard method – still therefore an overall shortfall even if all potential Green Belt sites were to be included.

LBS: Reg 18 identified 3 different growth options:

A: London Plan 469 dpa

B: Mid-level growth 657 dpa

C: Higher growth 886 dpa (existing standard method figure)

Current target in the adopted Local Plan is 469, with average delivery of 463 over the last 15 years. The proposed changes to the standard method increases the figure to 1,628.

A stage 1 LAA has been undertaken, along with a call for sites exercise. Soon to commence stage 2. Will revisit green belt study to consider the implications of grey belt. MOL.

Outcome: Capacity therefore uncertain but unlikely to be able to assist in meeting EEBC's unmet needs.

Gypsy & Traveller Accommodation

EEBC: EEBC wrote to LBS in November 2022 to seek assistance in meeting Gypsy and Traveller needs, which at the time was for ten pitches.

Subsequently we consulted on our Reg 18 which included a proposed allocation for ten pitches within one of the larger potential Green Belt site allocations. Following the change in definition of a Gypsy and Traveller, the need for additional pitches has increased to 18 (as identified in the GTAA 2022. There is therefore likely to be an unmet need.

LBS: The GLA have undertaken a study to assess need (not yet published) which has identified a pitch requirement for LBS of 15 (meet the wider definition). The Regulation 18 Local Plan proposes safeguarding existing sites and intensify the existing site at Woodcote to provide an additional 8 pitches. There may be the potential to extend an existing private site which would help to meet the identified need.

Outcome: Unlikely to be capacity to help meet some of EEBC's unmet needs.

Flood Risk (principally from surface water)

Believe both authorities consider surface water flooding to be the greatest risk.

EEBC: An updated SFRA has been undertaken Level 1 (published) and a site-specific Level 2 (soon to be published).

LBS: A Level 1 SFRA was published in July and a Level 2 will be undertaken next year.

Outcome: Continue to share information and identify issues as they arise.

Improving sustainable transport choices, particularly in association with new development

EEBC: Surrey County Council is currently undertaking a Transport Assessment, which will identify the impact on the transport network and subsequently identify mitigation where required. Will share the results with LBS.

EEBC met with TfL in relation to a potential CIL bid for extending the S2 route to Epsom hospital.

LBS: Intend to commission a Transport Assessment.

- Tram: TfL paused Tram on affordability. Regulation 18 Local Plan continues to protect the alignment for the first phase. New development will not be reliant on the implementation of the tram.
- Rail: £14 million Levelling up funding to improve the frequency on the Belmont -Epsom line.
- Council still committed to the delivery of the London Cancer Hub (LCH). Sustainable travel options will be important. Possibility of a new hospital on site.
- Gibson Road car park part of Civic Centre redevelopment.

Outcome: EEBC to share the Transport Assessment with LBS once received.

includes a ground floor commercial unit, which may be used for healthcare. Other options could be provided within town centres e.g. within the St Nicholas Centre.

Outcome: Continue to share information and identify issues as they arise.

4) Other Strategic Matters

Employment needs:

EEBC: Epsom & Ewell: Main industrial area is the Longmead and Kiln Lane Estates. Evidence base study concluded industrial estates are very valuable to the local economy supporting a diverse range of businesses. A small number of parcels of land within the industrial estate have been promoted for development through the call for sites process for residential use. Evidence shows most of the land in the industrial area is not generally available for redevelopment so not deliverable. Reg 18 sought to protect these areas for employment use. HEDNA identifies a need for circa 56,000 sqm (20,000 for office, 20,000 for light industrial and 16,000 for warehousing). Intending to meet these needs through intensification.

LBS: Employment Land Review / Economic Needs Assessment. Study identified industrial need of 170,000sqm floorspace over the plan period. The Reg 18 strategy was to safeguard and intensify but this is unlikely to meet need. likely to be seeking assistance from other authorities to meet the need. Some potential for the release of MOL near Beddington industrial site.

Outcome: Continue to share information and identify issues as they arise

5) Other issues

SOCG

A SOCG will be needed. Work to commence on this soon.

Elmbridge Borough Council: 17/10/24

Duty to Cooperate: Meeting minutes
Elmbridge Borough Council and Epsom & Ewell BC
Meeting date 17/10/24

Attendees

EEBC - Planning Policy Manager
EEBC - Principal Policy Officer
EBC - Local Plans Manager
EBC - Principal Policy Planner

1) Update on position with Local Plan

EEBC: Consulted on Reg 18 in February to March 2023. Council paused the Local plan process in March and un-paused in November 2023. Currently aiming for a Reg 19 consultation in early 2025, subject to approval by LPPC on 20 November and Full Council in December 2024.

EBC: EBC provided update on progress with the Local Plan EiP. Plan was found unsound as submitted by the Inspector and Council is now awaiting a response from the Inspector which will determine direction of the draft Plan.

2) DTC update

EEBC: Consulted upon a DTC framework, which sought to identify DTC partners and strategic cross boundary issues. Use the framework to document engagement on issues and will seek to use this to inform a Statement of Compliance and to draft SOCG.

3) DTC framework (Issues identified)

Housing Needs/Green Belt

Both EBC & EEBC have previously engaged on this issue.

EEBC: Housing Need Assessment published in 2022. Northern part of the borough has links to the London housing market but not in the same HMA. The existing standard method figure for EEBC is 573 units per annum. The proposed changes to the standard method results in a figure of 817 units per annum.

EEBC wrote to LBS in November 2022 when work on the first iteration of the LAA was largely complete. This identified that the urban area could potentially accommodate 3,849 dwellings or 37% of housing need as identified through the existing standard method. The Reg 18 consultation followed in Feb/March 2023 which identified a strategy which sought to deliver approximately 3,700 new dwellings in the urban area and 2,175 through the release of just under

3.6% of the borough's Green Belt. This would equate to 56% of the standard method.

The Epsom & Ewell LAA has now been updated, which involved:

- Another Call for Sites exercise
- Contacting all landowners in 2022 LAA again to confirm availability (removing sites where unconfirmed)
- Reviewing 2022 LAA sites against any updated evidence (e.g. changes to EA flood zones)
- Reviewing capacities of individual sites (seeking to optimise yields)
- Reviewing current planning apps/pre-apps
- Updated windfall allowance – including an allowance for small (1-4) and medium (5-19) windfalls
- Updating the trajectory

Headline LAA findings: 33 urban sites are considered developable/deliverable, which could meet 34% of standard method. The potential yield from all Green Belt sites promoted for development would be 46% of standard method – still therefore an overall shortfall even if all potential Green Belt sites were to be included.

EBC: Inspector's interim findings require EBC to revisit the sustainability appraisal, options for meeting housing need and the conclusions drawn in relation to the Green Belt work and consideration of alternative sites, including the release of Green Belt sites to address the 6,300 shortfall. EBC confirmed they would engage with E&E in relation to housing need once evidence is updated. However, highly likely that given the scale of need in the Borough EBC will not be in a position to assist its neighbours with meeting their housing need and may not be able to meet its housing need in full.

Outcome: Given the current situation, it is unlikely EBC will be able to assist in meeting EEBC's unmet needs.

Gypsy & Traveller Accommodation

EEBC: EEBC wrote to EBC in November 2022 to seek assistance in meeting Gypsy and Traveller needs, which at the time was for ten pitches. Subsequently we consulted on our Reg 18 which included a proposed allocation for ten pitches within one of the larger potential Green Belt site allocations. Following the change in definition of a Gypsy and Traveller, the need for additional pitches has increased to 18 (as identified in the GTAA 2022). There is therefore likely to be an unmet need.

EBC: EBC confirmed identified need for 10 additional pitches in the Borough for 'travelling' travellers as consultants ORS confirmed that the 2023 change in definition did not impact the borough's 'non-travelling' travellers. 4 pitches to be met in years 1 – 10 and 6 pitches in years 11 – 15. A recent application has come forward for 6 to 7 pitches. There are also a number of unauthorised pitches in the Borough but they need to be formalised through a planning

application before they can contribute to meeting identified need. EBC can therefore meet their current identified need for pitches but the evidence needs to be updated and there could be an increase in identified need due to the change in definition as seen in E&E.

Outcome: EBC confirmed that they will have to look to update their need and are unable to commit at the stage in meeting needs from elsewhere.

London Borough of Sutton: 20/01/25

Duty to Cooperate: Meeting minutes
London Borough of Sutton and Epsom & Ewell BC
Meeting date 20/1/25

Attendees

EEBC - Planning Policy Manager
EEBC - Principal Planning Policy Officer
LBS - Planning Policy Manager

1) Update on position with Local Plan

EEBC:

EEBC has been through a two-stage process to approve the Proposed Submission Local Plan for consultation. Firstly the plan was considered by the Licensing and Planning Policy Committee on 20 November 24, who resolved to recommend to Full Council that (among other things), the Council undertake a Regulation 19 consultation on the plan, following by submission for an Examination in Public (EiP) 'as soon as practicably possible'. On 10 December Full Council subsequently approved these recommendations.

The new NPPF was published 12 December, which clarified EEBC's options for the Local Plan. EEBC resolved to seek to submit the plan for an EiP by the three-month transitional deadline (i.e. by 12 March 2025), to enable it to be examined against the previous NPPF. As such the Council's LDS was revised and the Regulation 19 consultation commenced on 20 December ending on 5 February.

LBS:

LBS completed a Regulation 18 consultation in September 2024. The intention is to consult on a Regulation 19 version this year, although there is a need to undertake further studies on the Green Belt, including consideration of grey belt. LBS also stated that under the new standard method their housing need has increased from 886 to 1,600. It was clarified that the 886 figure under the standard method was subject to a cap, without the cap it was circa 2,000. The revised methodology has removed the cap and the need under the new standard method is for 1,600 units. As such while it has been reported that the figures for many London Borough's has reduced, the removal of the cap has meant that in reality, they have increased. LBS consider this to be a very challenging target.

2) Proposed Submission Local Plan – what has changed from Regulation 18

An overview was provided of the main changes to the plan since the Regulation 18 Draft Local Plan.

The Proposed Submission Local Plan follows the same structure as Reg 18. The main changes are:

Housing

The Standard Method (prior to recent changes) set an annual housing need figure for EEBC of 569 dwellings per annum which is **10,242** over the plan period. The Reg 18 draft Local Plan contained a proposed a housing requirement of 5,400 homes & the release of four green belt sites to provide 2,175 new homes. At Reg 19 the proposed housing requirement is for **4,700 homes** (700 unit difference).

Changes are due to:

- Update of the LAA – a strict approach taken to land availability – a number of sites have fallen away.
- One significant Green Belt site (Ewell East station) has fallen away due to issues with deliverability
- There have been a few smaller Green Belt additions – further NHS sites in west Park coming forward.
- Some amendments to the amount of housing delivered on various sites – e.g. Horton Farm was 1,500 now 1,250, urban sites like the Town Hall have also increased. Mainly due to consultation feedback, maximising the use of urban sites and updated evidence
- Addition of a medium size site windfall allocation
- Overall supply is estimated to be 4,928 – requirement provides for some flexibility

The strategy for housing delivery has remained the same – most sustainable locations first, prioritising PDL. Epsom Town Centre, local centres other centres, train stations within the urban area. Along transport/movement corridors. Also includes land currently within the GB both PDL and green field land.

33% of standard method met through urban sites, 46% for all sources of sites.

Gypsies and Travellers

The requirement for SA35 to deliver 10 pitches has remained.

The Gypsy and Traveller policy S8 has been amended to require an element of provision on larger suitable windfall sites.

Environment and Sustainability

- Updates to policy on Flooding and Sustainable Drainage in response to comments from the EA and Surrey County Council
- Requiring building emission standards that exceed the building regulations from all developments delivering additional dwellings or non residential development
- Requiring BNG that exceed the national minimum of 10% from specific greenfield housing allocations.

Other changes

- Creation of a new policy on employment land (DM7) & update to the strategic employment policy (S9).

- New policy requiring the submission of a Health Impact Assessment from schemes exceeding 100 dwellings or 50 or more residential institution (class C2) bedspaces.
- Updates on heritage policies (S12 & DM13) to reflect feedback from Historic England, Surrey CC & EEBC's Conservation Officer.
- Inclusion of a self and custom build policy.

3) LBS views on Proposed Submission Local Plan

LBS stated that they were reviewing the plan and so far there were no significant concerns. A response will be provided by the close of consultation.

4) SOCG

EEBC shared with LBS and early draft of an SOCG for review. This will be amended to reflect the Reg 19 response. The aim is to send a final draft to LBS for review by 13/14 February.

Mole Valley District Council: 27/01/25

Duty to Cooperate: Meeting minutes Mole Valley DC and Epsom & Ewell BC Meeting date 27/1/25

Attendees

	EEBC - Planning Policy Manager
	EEBC - Principal Policy Officer
	MVDC - Planning Policy Manager
	MVDC - Principal Policy Officer

1) Update on position with Local Plan

EEBC:

EEBC has been through a two-stage process to approve the Proposed Submission Local Plan for consultation. Firstly the plan was considered by the Licensing and Planning Policy Committee on 20 November 24, who resolved to recommend to Full Council that (among other things), the Council undertake a Regulation 19 consultation on the plan, following by submission for an Examination in Public (EiP) 'as soon as practicably possible'. On 10 December Full Council subsequently approved these recommendations.

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33% of standard method met through urban sites, 46% for all sources of sites.

Gypsies and Travellers

The requirement for SA35 to deliver 10 pitches has remained.

The Gypsy and Traveller policy S8 has been amended to require an element of provision on larger suitable windfall sites.

Environment and Sustainability

- Updates to policy on Flooding and Sustainable Drainage in response to comments from the EA and Surrey County Council
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Other changes

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- Updates on heritage policies (S12 & DM13) to reflect feedback from Historic England, Surrey CC & EEBC's Conservation Officer.
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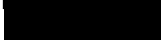
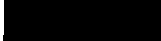
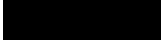
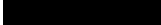
3) MVDC

MVDC stated that they were reviewing the plan and so far, there were no significant concerns. A response will be provided by the close of consultation.

Surrey County Council: 29/01/25

Duty to Cooperate: Meeting minutes
Surrey County Council and Epsom & Ewell BC
Meeting date 29/1/25

Attendees

 EEBC - Planning Policy Manager
 EEBC - Principal Policy Planner
 SCC - Spatial Planning and Policy Manager
 SCC - Principal Planning Officer
 SCC - Principal Planning Officer

1) Update on position with Local Plan

EEBC:

EEBC has been through a two-stage process to approve the Proposed Submission Local Plan for consultation. Firstly the plan was considered by the Licensing and Planning Policy Committee on 20 November 24, who resolved to recommend to Full Council that (among other things), the Council undertake a Regulation 19 consultation on the plan, following by submission for an Examination in Public (EiP) 'as soon as practicably possible'. On 10 December Full Council subsequently approved these recommendations.

The new NPPF was published 12 December, which clarified EEBC's options for the Local Plan. EEBC resolved to seek to submit the plan for an EiP by the three-month transitional deadline (i.e. by 12 March 2025), to enable it to be examined against the previous NPPF. As such the Council's LDS was revised and the Regulation 19 consultation commenced on 20 December ending on 5 February.

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- Addition of a medium size site windfall allocation
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The strategy for housing delivery has remained the same – most sustainable locations first, prioritising PDL. Epsom Town Centre, local centres other centres, train stations within the urban area. Along transport/movement corridors. Also includes land currently within the GB both PDL and green field land.

33% of standard method met through urban sites, 46% for all sources of sites.

Gypsies and Travellers

The requirement for SA35 to deliver 10 pitches has remained – EEBC have followed up the potential future management of this site with SCC as suggested.

The Gypsy and Traveller policy S8 has been amended to require an element of provision on larger suitable windfall sites.

Environment and Sustainability

- Updates to policy on Flooding and Sustainable Drainage in response to comments from the EA and Surrey County Council & informed by the new SFRA.
- Requiring building emission standards that exceed the building regulations from all developments delivering additional dwellings or non residential development. This was informed by SCC's Climate Change Study, which is still in draft form – when will the final version be available to publish?
- Requiring BNG that exceed the national minimum of 10% from specific greenfield housing allocations. 20% on certain greenfield allocations.

Other changes

- Creation of a new policy on employment land (DM7) & update to the strategic employment policy (S9).
- New policy requiring the submission of a Health Impact Assessment from schemes exceeding 100 dwellings or 50 or more residential institution (class C2) bedspaces. SCC had specifically requested this.
- Updates on heritage policies (S12 & DM13) to reflect feedback from Historic England, Surrey CC & EEBC's Conservation Officer.
- Inclusion of a self and custom build policy.

3) SCC views on Proposed Submission Local Plan

SCC are reviewing the plan and the team are collating feedback from various departments to ensure a comprehensive response.

SCC will be suggesting some amended/additional wording to policy SA35 – see below. EEBC raised concerns over the wording ‘in perpetuity.’

In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site and enable the site to be served by public transport **to include the provision of appropriate bus priority, and other passenger transport facilities .**
- b) Provide permeability through the site for pedestrians and cyclists into and from the development to provide connectivity between adjoining residential areas and associated facilities and Horton County Park.
- c) **Establish the permanent operation of an improved bus network to link the site into Epsom town centre, hospital, rail station and local schools, and towards Kingston. The developer will be expected to set up a method of funding which delivers the improved network in perpetuity**
- d) Provide a community building, capable of accommodating early years education provision and other community uses responding to the needs of the locality.


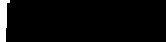
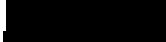

4) SOCG

EEBC shared with SCC and early draft of an SOCG for review. This will be amended to reflect the Reg 19 response. The aim is to send a final draft to SCC for review by 13/14 February.

Elmbridge Borough Council: 30/1/25

Duty to Cooperate: Meeting minutes
Elmbridge Borough Council and Epsom & Ewell BC
Meeting date 30/1/25

Attendees

 EEBC - Planning Policy Manager
 EEBC - Principal Planning Policy Officer
 EBC - Planning Policy Manager
 EBC - Principal Planning Officer

1) Update on position with Local Plan

EEBC:

EEBC has been through a two-stage process to approve the Proposed Submission Local Plan for consultation. Firstly the plan was considered by the Licensing and Planning Policy Committee on 20 November 24, who resolved to recommend to Full Council that (among other things), the Council undertake a Regulation 19 consultation on the plan, following by submission for an Examination in Public (EiP) 'as soon as practicably possible'. On 10 December Full Council subsequently approved these recommendations.

The new NPPF was published 12 December, which clarified EEBC's options for the Local Plan. EEBC resolved to seek to submit the plan for an EiP by the three-month transitional deadline (i.e. by 12 March 2025), to enable it to be examined against the previous NPPF. As such the Council's LDS was revised and the Regulation 19 consultation commenced on 20 December ending on 5 February.

EBC:

EBC's request for a 12-to-15-month period to address the soundness issues has been denied. EBC now have two options: to withdraw the plan or the Inspector will issue a report deeming the plan unsound. A decision will be made in February.

2) Proposed Submission Local Plan – what has changed from Regulation 18

An overview was provided of the main changes to the plan since the Regulation 18 Draft Local Plan.

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Housing

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2,175 new homes. At Reg 19 the proposed housing requirement is for **4,700 homes** (700 unit difference).

Changes are due to:

- Update of the LAA – a strict approach taken to land availability – a number of sites have fallen away.
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33% of standard method met through urban sites, 46% for all sources of sites.

Gypsies and Travellers

The requirement for SA35 to deliver 10 pitches has remained.

The Gypsy and Traveller policy S8 has been amended to require an element of provision on larger suitable windfall sites.

Environment and Sustainability

- Updates to policy on Flooding and Sustainable Drainage in response to comments from the EA and Surrey County Council
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- Requiring BNG that exceed the national minimum of 10% from specific greenfield housing allocations.

Other changes

- Creation of a new policy on employment land (DM7) & update to the strategic employment policy (S9).
- New policy requiring the submission of a Health Impact Assessment from schemes exceeding 100 dwellings or 50 or more residential institution (class C2) bedspaces.
- Updates on heritage policies (S12 & DM13) to reflect feedback from Historic England, Surrey CC & EEBC's Conservation Officer.
- Inclusion of a self and custom build policy.

3) EBC views on Proposed Submission Local Plan

EBC are reviewing the plan. Currently looking at Committee deadlines to ensure a response can be submitted by the close of consultation.

4) SOCG

EEBC shared with EBC and early draft of an SOCG for review. This will be amended to reflect the Reg 19 response. The aim is to send a final draft to EBC for review by 13/14 February.

Royal Borough of Kingston Upon Thames: 30/021/275

Duty to Cooperate: Meeting minutes

Royal Borough of Kingston Upon Thames and Epsom & Ewell BC

Meeting date 30/1/25

Attendees:

EEBC - Planning Policy Manager
EEBC - Principal Planning Policy Officer
RBK - Planning Policy Manager
RBK - Planning Policy Officer

1) Update on position with Local Plan

EEBC:

EEBC has been through a two-stage process to approve the Proposed Submission Local Plan for consultation. Firstly the plan was considered by the Licensing and Planning Policy Committee on 20 November 24, who resolved to recommend to Full Council that (among other things), the Council undertake a Regulation 19 consultation on the plan, following by submission for an Examination in Public (EiP) 'as soon as practicably possible'. On 10 December Full Council subsequently approved these recommendations.

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RBK:

Considering the implications of the new NPPF

2) Proposed Submission Local Plan – what has changed from Regulation 18

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- Updates on heritage policies (S12 & DM13) to reflect feedback from Historic England, Surrey CC & EEBC's Conservation Officer.
- Inclusion of a self and custom build policy.

3) RBK views on Proposed Submission Local Plan

RBK are in the process of reviewing the plan and have not yet identified any significant concerns. A response will be provided by the close of consultation.

4) SOCG

EEBC shared with RBK and early draft of an SOCG for review. This will be amended to reflect the Reg 19 response. The aim is to send a final draft to RBK for review by 13/14 February.

Reigate & Banstead Borough Council: 31/01/25

Duty to Cooperate: Meeting minutes
Reigate & Banstead BC and Epsom & Ewell BC
Meeting date 31/1/25

Attendees

EEBC - Planning Policy Manager
EEBC - Principal Planning Policy Officer
RBBC - Planning Policy Manager

1) Update on position with Local Plan

EEBC:

EEBC has been through a two-stage process to approve the Proposed Submission Local Plan for consultation. Firstly the plan was considered by the Licensing and Planning Policy Committee on 20 November 24, who resolved to recommend to Full Council that (among other things), the Council undertake a Regulation 19 consultation on the plan, following by submission for an Examination in Public (EiP) 'as soon as practicably possible'. On 10 December Full Council subsequently approved these recommendations.

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- Updates on heritage policies (S12 & DM13) to reflect feedback from Historic England, Surrey CC & EEBC's Conservation Officer.
- Inclusion of a self and custom build policy.

3) RBBC views on Proposed Submission Local Plan

RBBC have no significant concerns and will provide a response by the close of consultation.

Appendix 9

Appendix 9a Position Statement - Surrey Nature Partnership	1
Appendix 9b state-of-surreys-nature report (2017)	4

Recommendation for adoption of 20% minimum biodiversity net gain across Surrey's planning sector: *a Surrey Nature Partnership Position Statement*

Summary:

- The **Surrey Nature Partnership** recommends that Surrey's local planning authorities adopt a policy for **Biodiversity Net Gain** that will require developers using **Biodiversity Metric 2.0** (or as subsequently amended) to demonstrate the post-development achievement of a minimum **20%** increase in biodiversity units, in support of their planning application(s).
- This can be justified using government research on this matter as well as the findings of the **State of Surrey's Nature** document. Surrey's relative dependency on its high value natural environment for economic prosperity and employment, and the health & well-being of its population, also contributes to this justification.

I. Need for a position statement.

Surrey's 11 local planning authorities (LPAs) are all currently at various stages in the process of adopting new Local Plans, most of which are guided by the National Planning Policy Framework (March 2019) and related National Planning Policy Guidance. The NPPF advises at paragraph 174(b): *"To protect and enhance biodiversity... plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing **measurable net gains for biodiversity**."*

The government consulted on the introduction of mandatory biodiversity net gain into the planning system in late 2018 and confirmation of this was announced in spring 2019. The emerging Environment Bill will set-out the statutory obligations of this decision in detail. The consultation has suggested that legislation will set the minimum gain required in biodiversity units at 10% over base value. However, several leaders in this policy area have already adopted a 20% minimum gain, with robust justification for doing so¹.

As the recognised local specialist consultant in this policy area, the Surrey Nature Partnership is of the opinion that similar justification applies locally in Surrey and will consequently promote a recommendation for adopting 20% minimum biodiversity net gain here. It is important that this position is made clear to Surrey's LPAs at this timely stage in their plan-making, and ahead of any

¹ See; Lichfield District Council [Biodiversity & Development: Supplementary Planning Document 2016](#), (p.17) & Oxfordshire's Biodiversity Advisory Group [proposals for the Oxfordshire Plan 2050](#).

more prescriptive guidance from Defra that could undermine our policy position and its associated recommendation.

LPA's might also consider local policy on the issue of potential development exemptions to the requirement for Biodiversity Net Gain, which is currently proposed as a way of retaining economic viability of smaller plots. LPA's could consider a local variation of the suggested minimum threshold size of 10 housing units if, for example, an authority anticipates the majority of its future housing need will be realised within developments below this threshold.

2. Local justification for recommending minimum 20% Biodiversity Net Gain.

2.1 Evidence from national Cost/Benefit Analysis.

Within the evidence presented by Defra consulting on the introduction of Biodiversity Net Gain into the planning system (December 2018-February 2019), it was made clear that an increase of 10% would be the *absolute* minimum necessary to ensure confidence that a net loss in biodiversity would be avoided, and that any gain would actually be realised as an outcome of a development-related biodiversity 'enhancement' project.

Relevant findings from Defra's **Impact Assessment** document² (21/11/2018) include (our emphases):

- “..In simple terms, [10%] is the lowest level of net gain that [Defra] could confidently expect to deliver genuine net gain, or at least no net loss, of biodiversity and thereby meet its policy objectives.”
- “..Advice from some Natural Capital Committee members suggests that a level of net gain at or above 10% is necessary to give reasonable confidence in halting biodiversity losses.”
- “..The department therefore favours as high a level of net gain as is feasible... The analysis undertaken in this Impact Assessment indicates that the level of requirement makes relatively little difference to the costs of mitigating and compensating for impacts.”

2.2 Surrey's rate of biodiversity loss.

In 2017 the SNP published **The State of Surrey's Nature**³, which followed closely the publication of the national **State of Nature 2016** report⁴ and provided an opportunity for some comparisons. Our report concluded the likely local extinction of an estimated 11.5% (or around 1 in 9 species) native to the county since 1985, with a further 4.4% threatened with local extinction. In contrast the national extinction rate in 2016 was concluded at 2% extinct and 13% threatened.

Even without a coastline the Surrey administrative area is recognised as ecologically capable of supporting a relatively diverse flora and fauna (ie. its biodiversity). It may be predicted therefore that our rate of species loss in response to pressures applying universally will be higher than average. This

² See; [Biodiversity Net Gain Consultation Impact Assessment](#), Defra 2018

³ See; [The State of Surrey's Nature](#), SNP 2017.

⁴ Since this, a new national State of Nature 2019 report has been published, which predictably shows a worsening situation.

is indeed the evidence of the *State of Surrey's Nature*. Furthermore, county extinction events result from a steady attrition and final loss of all local populations of a species and there is ample evidence of this in process on many important sites across Surrey. The impacts of historic habitat loss and fragmentation alongside routine wildlife persecution, compounded by more modern and ongoing impacts associated with intensification of agriculture and eutrophication of soils and water, have clearly had particularly negative consequences for the biodiversity of Surrey. It can therefore be concluded quite reasonably that national goals for recovery of biodiversity will in Surrey demand a somewhat elevated approach from our LPAs toward both policy-setting and regulation of mandatory BNG via development management, in order to ensure an uplift beyond that to apply as standard.

2.3 Natural Capital.

One further argument relates to the fundamental role of Surrey's natural environment in its economic prosperity as well as its positive impact on the health and well-being of its residents. These considerations are now collectively appreciated and valued monetarily as 'natural capital', and the evidence for the importance of this in Surrey is growing⁵. We enjoy and indeed are envied for our beautiful, signature countryside, which encourages domestic and foreign tourism, attracts significant business start-ups and relocations, and features strongly in local product branding and endorsement. In recognition of this role an enhanced focus on investment in our natural environment over and above the norm would appear to be justifiably sound. Biodiversity Net Gain is the only current measurable proxy for the level of such investment.

3. Conclusion.

These factors, both general and pertinent to Surrey, commend us to the position of support and active encouragement for universal adoption of a required minimum 20% biodiversity net gain within relevant policy by all of our local planning authorities. The necessary justification is clearly laid out above and may be used by LPAs to underpin their policies.

There is already some information available on the practical achievement of biodiversity net gains on the SNP website⁶. In time, the SNP intends to issue further guidance to aid both developers and planners in the interpretation and regulation of biodiversity net gain, and remains able to assist Surrey's LPAs in whatever way on this matter in the interim.

⁵ See; [Natural Capital Investment Plan for Surrey](#), SNP 2018.

⁶ See; [Biodiversity & Planning in Surrey](#), March 2019 (p.35-36, section 4a), and [Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network](#), September 2019 (p.5, section 1.3).

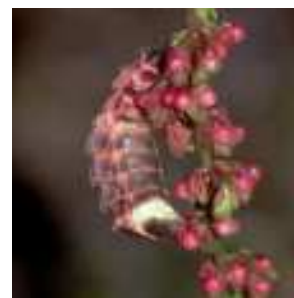


The State of Surrey's Nature



Surrey Nature Partnership

Healthy Environment | Healthy People | Healthy Economy



Contents

Introduction	4
Surrey's Biodiversity	5
Headline Conclusions	6
Broad Habitat Accounts	11
- Woodland & Parkland	12
- Semi-natural Grasslands & Heathland	14
- Wetlands	18
- Farmland	20
- Urban	22
Investing in Surrey's Natural Capital	24
Conclusion	26
References	27
Appendix	28

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Chair - Biodiversity Working Group

Produced by Surrey Wildlife Trust on behalf of the Surrey Nature Partnership

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Introduction



Surrey's Coronation Meadow at Sheepheas

Surrey's Local Nature Partnership was formally approved by national Government in August 2012. LNPs are an initiative of the Natural Environment White Paper: *The Natural Choice: securing the value of nature* and are intended to strengthen local action in effecting the recovery of biodiversity, while enabling local leadership to champion the benefits of a healthy natural environment. Furthermore they are specifically encouraged to promote the green economy and work closely in this with their equivalent Local Enterprise Partnerships.

The Surrey Nature Partnership now has a strong governing Board directing several working groups, and has made progress with a number of projects and initiatives to address its mandated *raison d'être* as summarised above.

This *State of Surrey's Nature* report is intended to provide the Partnership with a current stock-take of the county's biodiversity, to include as many of its wildlife species and their habitats as possible. The overall aim is to quantify what we have lost in recent history and that which remains most threatened. This will help to clarify where our responsibilities to national and international biodiversity conservation lie, thus serving

to further prioritise our conservation efforts at the county level. The report also recognises new natural colonisers as well as species undergoing population expansions, and provides contextual explanation for all these up and downward trends, and the local extinctions.

More difficult to assess is how these findings relate to the overall 'health' of our natural environment, ie. its future sustainability. At best we can assume the simple premise that higher diversity must offer stronger, more complex ecosystems that are more resilient to human-induced impacts, for example climate change. Where there are obvious examples of critical species/ ecosystem-function relationships at stake, these are highlighted here.

In its simplest application this report can be used as a base-line from which to measure future biodiversity trends and changes. From this all the partners in the Surrey Nature Partnership will not only be able to gauge the success of future programmes, but are also better evidenced in their mission to tirelessly remind the residents of Surrey of the fundamental contribution of its outstanding natural environment to our well-being and all our livelihoods.

Surrey's Biodiversity

It is no secret that Surrey is an impressively diverse county biologically. Indeed it is possibly the most blessed of all land-locked counties in terms of sheer numbers of recorded species. This owes much to British social history and the proximity of Surrey to a ready concentration of able natural historians of every specialist persuasion. Partly inspired by their legacy, Surrey's natural history continues to be well recorded and can also boast an effective, accessible collective catalogue by way of the ongoing Surrey Atlas Project, published by the Surrey Biodiversity Information Centre through the Surrey Wildlife Trust.

Although small, the administrative county boundary delimits a portion of Great Britain that is so-positioned geologically to support a relative complexity of natural habitats. We are also in the south-eastern corner of our islands where both climate and European continental proximity are most influential in boosting biological diversity. Thus we may lack a coastline but are gifted with a significant proportion of the country's remaining lowland heathland and mires, juxtaposed by smaller but equally well-preserved examples of Chalk downland, together with several richly varied river catchments as well as a palette of historically-derived woodland management types.

Semi-natural habitats (see page 14) comprise a proportionately far more significant land-use in Surrey than many other English lowland counties. Again this has as much to do with social history as with the natural character of the landscape and its incapacity to support more intensive forms of agriculture. On the advancing fringe of south-west London, those with influence on national policy (and extensive countryside estates) led an early land protection movement born largely out of necessity, which eventually culminated in Green Belt legislation in 1938. Irrespective of this land-use changes have manifested here as elsewhere, with the more easily worked parts of Surrey witnessing their share of intensification (then latterly redundancy) in farming; quarrying of minerals; river realignment schemes; as well as creeping urbanisation in an ever upwards trajectory from the end of the Second World War.

With all this diversity of course comes responsibility. Surrey can lay claim to important populations of around 30% of the tranche of rapidly declining species afforded 'priority' conservation status initially under the UK Biodiversity Action Plan, and now the *Natural*

Environment & Rural Communities Act. These reside within 19 similarly protected priority habitats (see Table 2 in the Appendix). Indeed a not insignificant number of species are now wholly reliant on efforts to conserve them in this county for their long-term future in the UK. But whilst celebrating our distinctiveness we should also be mindful of this report's sad indication that nearly 12% of our native wildlife has been lost; clearly this is neither the time nor place for resting on laurels...



The declining & now largely coastal Long-horned mining bee has important inland populations in Surrey

1. Surrey Biodiversity Partnership

Following the landmark International Convention on Biological Diversity in 1992, the UK published a national plan to halt and begin reversal of continuing biodiversity declines. The Surrey Biodiversity Partnership implemented its own county Biodiversity Action Plan from 1999 through to the restructure of the UK response to ICBD in 2010¹. Chaired by Surrey County Council and with a single co-ordinator post providing continuity throughout the period, the partnership's members led various roles across the plan's ten Habitat and two Species Action Plans. Together these set out a framework for the action needed to recover biodiversity in Surrey. Much great work was achieved during this period², drawing on funding sources available at the time to make significant gains in the extent of key habitats, as well as enacting several successful threatened species recovery projects. These are duly referenced in the relevant sections that follow.

¹ See; JNCC (2010): *UK Post-2010 Biodiversity Framework*

² See; SBP (2010): *The Surrey Biodiversity Action Plan: achievements and future action*

Headline Conclusions

In the last five years we have seen the launch of two national *State of Nature* reports, initially in 2013 with its update in late 2016. Both these presented stark factual evidence for the continuing decline in biodiversity across the UK. The 2016 report in particular used new measures of change from national monitoring schemes to show how our wildlife varies widely in response to modern pressures on the natural environment. Some species appear stable or indeed are thriving, but a great many certainly are not.

2. Key findings from *State of Nature 2016*

- 56% of UK wildlife species have shown a declining population trend between 1970 and 2013;
- 15% of all UK wildlife is either threatened with extinction (ie. Red Listed - 13%), or is extinct already (2%).
- The UK Priority Species Indicator shows a post-1970 declining population trend index of 67% across the tranche of species with priority conservation status.
- The report has introduced a new index of global 'Biodiversity Intactness' to attempt to measure the planet's descent from its notional pristine natural state. In this the UK compares very badly in the international league table included in the study.

This *State of Surrey's Nature* report has been researched in a similar context to the two national documents, but largely without the confidence in species population trends achieved through their scale of country-wide collected data. Nevertheless, the scope of our research has for the first time brought together a catalogue illustrating the strength, variety and uniqueness of the county's biodiversity.

We have also gauged these species' vulnerabilities without appropriate conservation action. For the grand total of 4,242 species from an aggregated pool that includes plants and lichens, plus most of the major invertebrate and all vertebrate groups, we have firstly decided their qualification for a criteria-based 'long list' as Species of Conservation Concern in Surrey. Species include those believed extinct here already; species threatened or near-threatened (if so-designated on national Red Lists); those of restricted national and local distribution; as well as priority and legally protected species. This long list (2,155 species) has then been analysed further to refine recognition of local status and vulnerability to extinction. See the Appendix for further information on the data research and analysis used in this report.

So for the entire species sample of 4,242 species we can estimate that 11.5%, or slightly below 1 in 9 of species native to the county are now locally extinct (**Box 3** discusses this alarming extinction rate in more detail). Clearly we are faring much worse than the national 2% concluded by *State of Nature 2016*. 4.4% of species are threatened with extinction as decided by IUCN³ Red List criteria, while a further 2.8% narrowly miss these and qualify as near-threatened in Surrey. A further 13.8% of species are over a perceived threshold of rarity in the county with demonstrable evidence to show their historic and/or continuing decline. Only 3.1% are of comparable rarity but in contrast appear to be increasing; 15.2% comprise those Species of Conservation Concern that for now at least appear stable.

Just under half of the sample consists of species that are not of conservation concern for us at the present time and although many will undoubtedly be in some concurrent state of flux, we have not explored this further for the purposes of this report. See **Figures 1** and **1a** (and **Table 1** in the Appendix). **Figure 1b** extracts the proportion of extinct species to better enable comparison with *State of Nature 2016*, indicating that an overall 23.7% of extant species are in some degree of trouble in Surrey.

By taxonomic meta-group...

Plants include the higher or Vascular plants, Bryophytes (mosses, hornworts and liverworts) and Charophytes (the stoneworts). **Lichens** have been aggregated here to align their treatment with *State of Nature 2016*, although of course they are not plants in the true sense. Of the total 1,922 species, 9.8% are believed to be extinct in Surrey; 5.5% are threatened; 3.4% are near-threatened in Surrey; a further 11.6% are in decline; 7.4% are assumed to be stable, while only 1% is increasing (see **Figure 2a**).

For **invertebrates**, the largest meta-group at 2,110 species, we have assumed 12.7% to be locally extinct. 2.5% are threatened and 1.8% near-threatened; 16.4% are in decline; while 22.7% are stable and 4.5% are increasing (see **Figure 2b**). Although large this group still only represents a fraction of Surrey's invertebrate fauna. The included groups are: non-marine snails, slugs and bivalves; millipedes, centipedes and woodlice; spiders; mayflies; stoneflies; dragonflies; grasshoppers, crickets and allies; shieldbugs and water bugs; butterflies; caddis-flies; hoverflies; and six sub-groups comprising 46 families of both aquatic and terrestrial beetles.

Vertebrates include breeding birds (both migratory and resident), mammals, reptiles, amphibians and

freshwater fish (210 species). 14.7% are locally extinct; 13.8% are threatened and 6.2% near-threatened; 7.1% are in decline; 12.3% are stable; and 8.6% are increasing (see **Figure 2c**).

The **priority species of national conservation concern** that have occurred in Surrey form a second interesting pool for analysis. Of a total 404 species, 31.2% are already extinct locally, while 37.1% are threatened and/or remain in worrying decline. This only leaves the remaining 31.7% presently considered stable or recovering (see **Figure 3** and **Box 5**).



Attention on the prioritised Phoenix fly has shown it to be less rare than previously thought

3. Local Extinction

Extinction is difficult to be sure of, certainly for a great many wildlife species with secretive life-styles that are notoriously 'under-recorded'. Plants can exist below ground in the seed-bank for many years, while some fungi put in an appearance only once in a human generation, or even a life-time! Invertebrates can naturally cycle through great ranges in abundance, and relative to other groups generally lack the expertise required for their reliable and consistent field detection.

The innovation of a new survey technique has often revealed species to be far less rare than originally realised. In consequence, rediscoveries of lost species are thankfully regular enough to warrant caution before labelling species as gone 'for ever'. Nevertheless, for this report we have decided to assume that species with no local records for over thirty years are indeed likely to be extinct, and if this period is over fifty years our assumption is viewed as definite (see **Figure 4**). If a species has knowingly been lost within the recent thirty year period, such knowledge clearly overrides the reciprocal 'extant' assumption.

Jonty Denton⁴ has undertaken a detailed analysis of the history of extinction in Surrey, for a broader range of species than is included in this report and for the wider biological recording county which includes parts of Greater London. He has concluded that while 60% of extinctions occurred before 1950, the actual rate of extinction has remained rather constant. However, Jonty has also analysed the number of extinct species by their preferred habitats, and sure enough this correlates with the most destructive periods of change impacting these habitats in the past. This aligns too with our own analysis of the priority habitat associations of extinct and declining Species of Conservation Concern summarised in the broad habitat accounts below and in **Figure 5** (see Appendix).

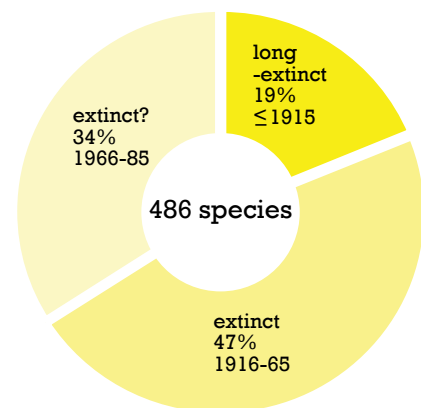


Fig. 4

³ International Union for Conservation of Nature.

⁴ Denton, Dr J. (in prep.): *Local Extinction: A Case Study of Species Loss in Surrey*

Headline Conclusions

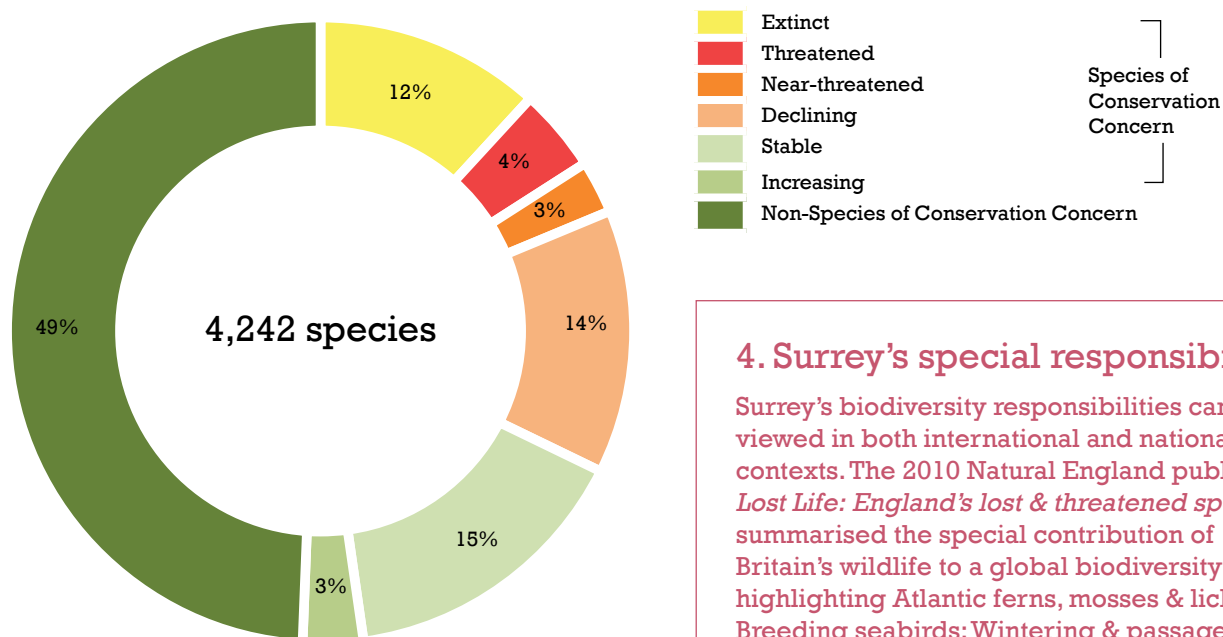


Fig. 1: Entire species sample

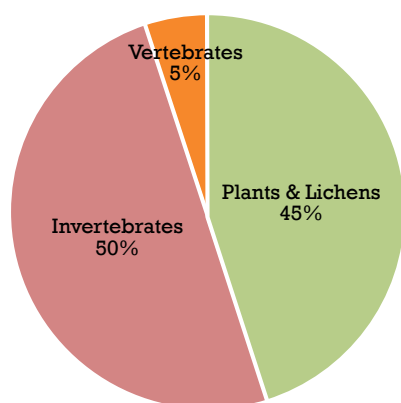


Fig. 1a: Relative size of meta-groups

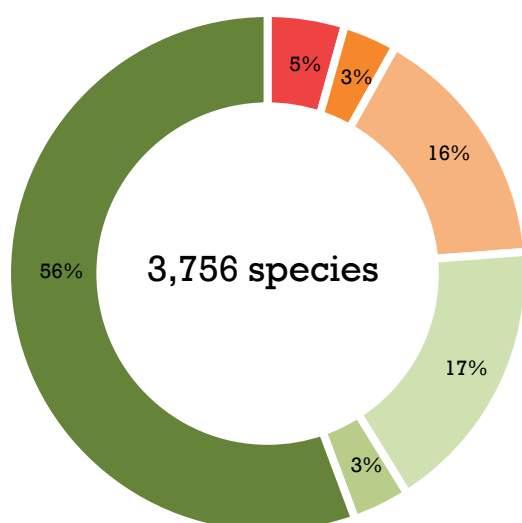


Fig. 1b: Extant species

4. Surrey's special responsibility

Surrey's biodiversity responsibilities can be viewed in both international and national contexts. The 2010 Natural England publication *Lost Life: England's lost & threatened species* summarised the special contribution of Britain's wildlife to a global biodiversity audit, highlighting Atlantic ferns, mosses & lichens; Breeding seabirds; Wintering & passage waterbirds/gulls; Grassland & woodland fungi; and Heathland invertebrates. The last three hold particular resonance with Surrey's biodiversity, especially the final group.

The South-West London Waterbodies Special Protection Area in the north of the county is internationally designated for its wintering waterfowl. Surrey has a rich fungal flora, with many hundreds of species recorded from some classic sites, including the Esher Commons, the Mole Gap woodlands at Norbury Park and Box Hill, and Windsor Great Park. Surrey's importance for lowland heathland and associated wetlands can never be over-stated, and it is no coincidence that a number of the UK's most endangered invertebrates are now believed to survive only on Surrey's heaths and commons.

From a more national perspective, Surrey is oft quoted as England's most wooded county. In consequence we find the county is special for many species requiring extensive and relatively continuous woodlands, for example several species of birds and bats, the native dormouse, woodland butterflies and others. Some of these woodlands even provide suitable conditions for disjunct populations of a few of those Atlantic bryophytes, although claims of 'responsibility' here might be somewhat tenuous. Yet we are undoubtedly very rich botanically, with an estimated 55% of the English vascular plant flora.

Unfortunately many of our rarest wild plants are now in an extremely fragile state, often clinging on in single sites in common with most English lowland counties. Unsurprisingly the flora of wetter heathland and bogs is well-represented in Surrey, as well as that of Chalk grassland and older broadleaved woodlands.

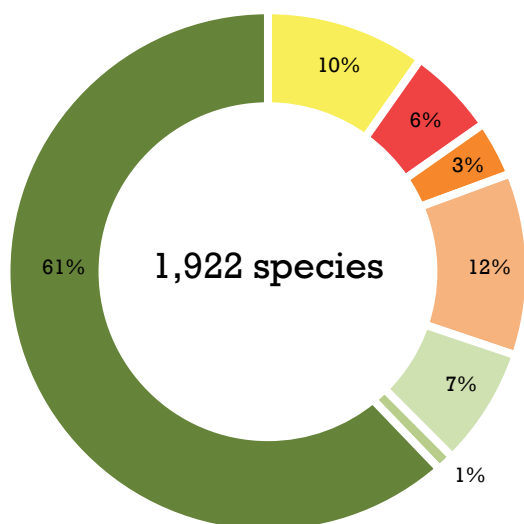


Fig. 2a: Plants & Lichens

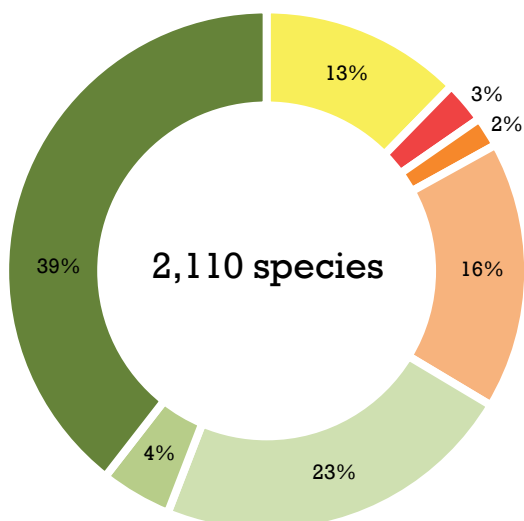


Fig. 2b: Invertebrates

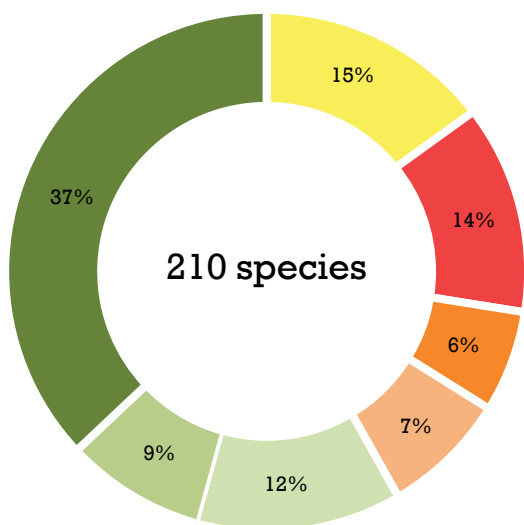


Fig. 2c: Vertebrates

5. Surrey's priority species of national conservation concern

Surrey can lay claim to having once supported at least 406 of the species nationally prioritised for urgent conservation action under the old UK Biodiversity Action Plan. Three of these have become extinct within England, accounting for the small disparity with the 404 Species of Principal Importance⁵ recorded in the county (affecting a stonewort, a snail and the now Scottish-only Wildcat; contrarily Hen harrier is a SPI but was never BAP priority). These of course are all also lost from Surrey, along with 125 others. Although the national strategy⁶ for meeting our commitments to the international UN Convention on Biological Diversity has undergone a major re-organisation in its current phase (2010-2020), the recovery of these selected species remains accountable to the goals of that strategy. No doubt this will prove elusive, certainly across the full range and 'regional' (ie. national) extinction for some is now believed to be inevitable.

Species recovery is ultimately dependent on the retention, expansion and appropriate management of preferred habitats, but for many their continued existence is so precarious that only a directly targeted, S-O-S response can hope to avoid imminent extinction. This can involve off-site boosting of part of the surviving population under 'safe' propagative conditions prior to reintroduction in the wild. Some examples of successful priority species recovery actions are cited under the relevant broad habitat accounts below.

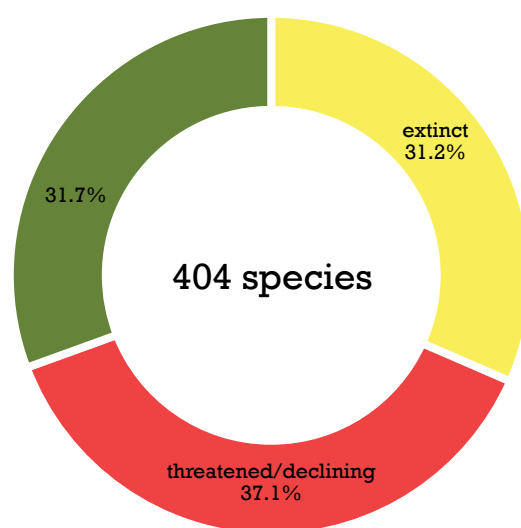


Fig. 3: Priority Species in Surrey

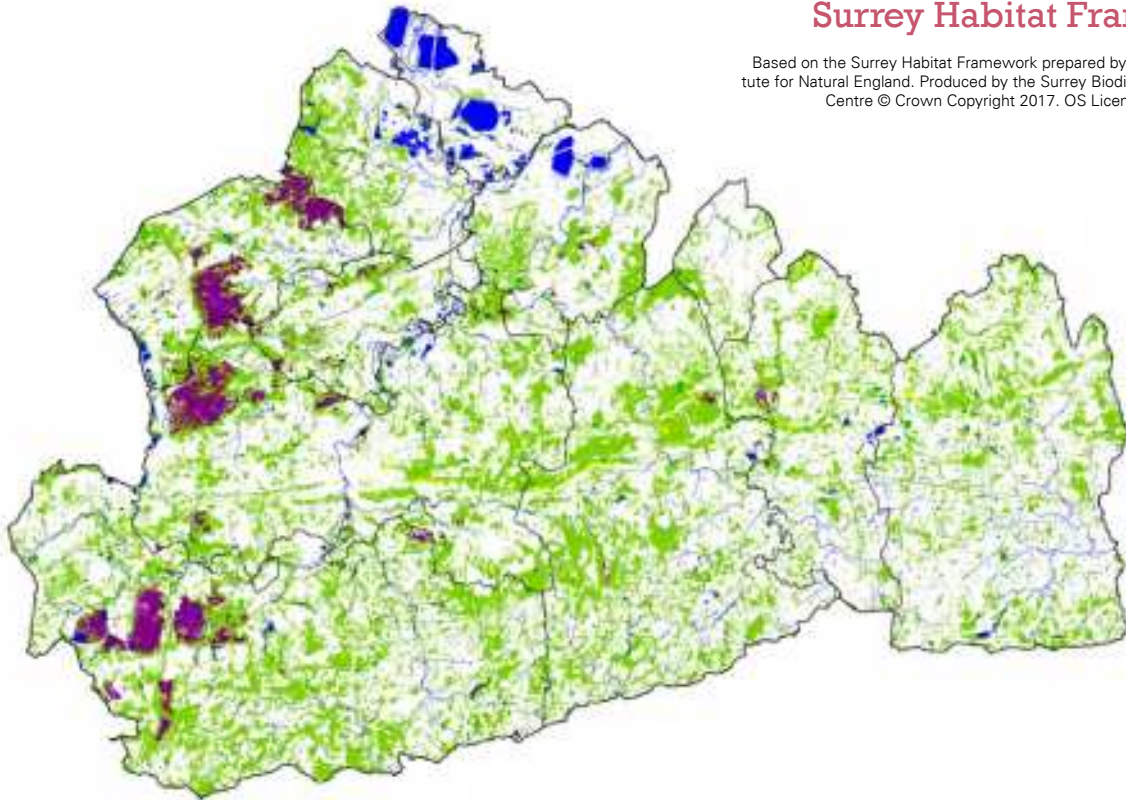
⁵ See; JNCC website: <http://jncc.defra.gov.uk/page-5705>

⁶ See; Defra (2011): *Biodiversity 2020: A strategy for England's wildlife and ecosystem services*



Priority Habitats within the
Surrey Habitat Framework

Based on the Surrey Habitat Framework prepared by the GeoData Institute for Natural England. Produced by the Surrey Biodiversity Information Centre © Crown Copyright 2017. OS Licence No. 100019613



Broad Habitat Accounts

The survey, mapping and quantification of wildlife habitat have all evolved over many decades in the UK. Methodologies and classification protocols have developed also, alongside the advent of digital Geographic Information Systems (GIS), which have significantly aided the capture and evaluation of this information. However, consolidation of the successive phases of habitat survey into a single definitive dataset is yet to be satisfactorily completed, although there are several works-in-progress available nationally. As ever, resource implications inevitably govern progress here.

In Surrey there have been a series of studies and projects aimed at estimating either the extent of all habitats within a single classification system, or for key individual habitat types such as lowland heathland, calcareous grassland and ancient woodland. One earlier and somewhat unique all-habitat project (the *Surrey Habitat Survey Review*) repeated its methodology in both 1975 and 1985 to detect changes in the extent of habitats across the ten year gap⁷. At present there are two referable datasets for the priority habitats classified as Habitats of Principal Importance, accountable in the current national biodiversity strategy⁶. One is Natural England's *Priority Habitats Inventory* and the other is the *Surrey Habitat Framework* under development by our local biological records hub, the Surrey Biodiversity Information Centre. The latter has had the active encouragement of Natural England and is designed to be a distinct refinement of the former, to finally offer the elusive integrated dataset that has been such a Holy Grail until now.

We next describe the state of Surrey's nature in the context of its main, broad habitat categories in an approach similar to that in *State of Nature 2016*.

⁷ See; Lindley, Dr A. (1986): *Surrey's Vanishing Wildlife: A Habitat Survey Review 1975-85*

Woodland & Parkland

Surrey's proportion of woodland cover is unrivalled by any other English county. Our North Downs Beech hangers, Yew groves and the extensive wooded Low Wealden ghylls are justly celebrated, while Box Hill's eponymous native Box stand is nationally unique.

Various estimates of this woodland cover have been attempted. The *Surrey Habitat Framework* indicates that just under 36,100 hectares or 21% of Surrey consists of the priority habitat types Mixed deciduous and Beech & Yew woodland, with coniferous woodland adding a further 5,100 hectares or 3% land cover.



The recently-recognised *Alcahœ whiskered* bat has a national stronghold in Surrey's woodlands



The Nightingale has declined in Surrey and is now largely confined to the far south of the county



Surrey's fragile Wood white population is nationally important but highly isolated

Woodland takes many forms, and it may be true to say that there is more woodland now than at any time since the early systematic clearances up to the late Medieval period. From the end of the 19th century woodland has been slowly regaining lost ground largely through natural succession, as the traditional extensive grazing of open habitats has declined. Conservation management has sought to revive this on the most important open sites for biodiversity, and might just be keeping pace with natural processes there at the present time. Another large addition to the woodland area has been through active coniferous afforestation in the post-war era, dealt with next under Semi-natural grasslands & Heathland.

This potential 'good news' woodland expansion story belies several issues for biodiversity conservation, however. The richest, most diverse woodland is our longest-established (ancient) broadleaved and mixed woodland, which was traditionally worked to produce an essential timber crop on a continuous, rotational basis. As the demand for home-grown timber began to decline especially after the First World War, these woodlands have increasingly fallen into neglect. The important rejuvenation phase delivered through regular management thus no longer happens and woodland biodiversity has subsequently suffered. Also, the destructive afforestation of biodiverse open habitats has an equivalent in woodland, when fast-growing non-native trees are extensively planted within former broadleaved, often ancient woodland stands. A suite of local declines and extinctions can be directly linked to woodland management change and neglect, including woodland butterflies such as the threatened Wood white and lost Pearl-bordered and Small pearl-bordered fritillaries. These will be only the tip of the iceberg, with many other invertebrates suffering equally. Birds such as Nightingales have been similarly implicated, although they also appear to have newer problems associated with the widespread explosion in deer populations impacting the habitat structure of woodlands through intensive browsing. This also poses a danger for rarer woodland flora. Woodlands, even ancient, are still threatened by human enterprise on occasion - agricultural and essential built infrastructure projects for example, and Surrey's relative abundance of trees quite possibly lends a certain complacency when implementing such decisions.

Surrey is also blessed with the valuable tree and woodland habitats associated with historic parklands, often tied to the former titled country estates laid out in the late 17th and 18th centuries. These usually feature significant numbers of veteran trees of extreme age together with ancient copses amidst permanent, often deer or stock-grazed rough grassland. Then there are the ancient grazed commons, nowadays largely wooded but also featuring high densities of aged trees, often as magnificent pollards. This is the priority

habitat Wood pasture & parkland and the *Priority Habitats Inventory* indicates that this is particularly well-represented in Surrey. Some well-known examples include Farnham and Loseley Parks, Clandon and Hatchlands Parks, Albury Park, Polesden Lacey, Ashted, Epsom and Bookham Commons, Priory and Gatton Parks at Reigate and of course Windsor Great Park. This habitat is most important for species dependent on dead and decaying wood, especially that still attached to veteran living or moribund trees, including fungi, epiphytic lichens and mosses, and a great many 'Saproxyllic' invertebrates. As historic heritage features, parklands tend to be relatively secure and many today belong to the National Trust, which is well versed in the exemplary conservation of their important biodiversity features.

New threats and solutions

Huge numbers of Surrey's trees fall outside woodlands and here remain vulnerable to indiscriminate removal for their perceived risk to human safety or transport disruption. Usually this is justified but the rate of removal may only increase with many new and rapidly spreading threats to native tree health, often introduced from abroad including Ash dieback (*Chalara*) and infestation by the Oak processionary moth. Dead wood, both standing and fallen, is so important to the diversity and function of wooded habitats that its needless disposal or removal off-site can only be harmful in the long-term.

More positively, several new drivers are encouraging a renaissance in broadleaved woodland management including restoration of non-native plantations to more natural mixed stands. The Forestry Commission is behind much of this innovation, especially directed at private owners of smaller woodlands. New developing markets for home-grown timber are also responsible, including for use as fuel in sustainable energy systems. This revaluation has furthermore revived the market in neglected native woodlands to return them to active management, thus affording additional long-term security. Finally, the planting of new native woodland for purely conservation reasons has a place in Surrey, even though this is clearly of low priority for us. There will always be locations where tree planting can fill compromising breaks in the continuity of semi-natural habitats throughout the landscape; a strategic overview is essential to realising such necessities however, and important existing biodiversity interests must certainly never be jeopardised.

Our analysis of the Species of Conservation Concern by their priority habitat associations indicates a 13.6% proportion of locally extinct; 18% of threatened; 10% of near-threatened; and 19% of further declining species are those of woodland (Mixed broadleaved and Beech & Yew) and/or Wood pasture & parkland habitats (see **Figure 5**, page 30).

Semi-natural Grasslands & Heathland

These essentially open, unwooded habitats are termed semi-natural as they were created and maintained through early clearance of the original natural vegetation for agriculture. They have never existed in isolation however, and their shifting interface with successional scrub and young woodland is forever in flux. Heathlands in Surrey are often in intimate association with a separate priority habitat treated elsewhere within the wetland category, Lowland fen. These are our fascinating valley mire systems or 'bogs', but the line where wet heathland ends and these begin really exists only in the minds of habitat surveyors so we describe them here.



The Man orchid is just one of sixteen orchid species present on Surrey's open downland



The UK is globally important for its heathland invertebrates, including the specialised Raft spider



The Curlew is close to extinction in Surrey and in worrying decline throughout the UK

Having been reduced greatly for agriculture and development over recent centuries, the best of these habitats is today within protected sites and therefore relatively secure from such threats. Yet there is still a significant area of perhaps degraded yet restorable habitat that remains vulnerable in sites such as golf courses. The purposed 'improvement' of semi-natural grasslands in the past using fertilisers, herbicides and reseeded to eliminate their diversity, continues more subtly today through diffuse and cumulative atmospheric pollution. The strongest evidence of this can be seen alongside roads and is due to vehicle emissions, where water-borne pollution from surface run-off is also problematic. A slow but insidious homogenisation of formerly rich plant communities through the loss of their individual, diverse characters is a particularly worrying modern phenomenon.

Calcareous grassland

The North Downs support a significant area of this nationally restricted habitat but less than that in our neighbouring counties of Kent, Sussex and Hampshire. Although formerly more extensive due to far wider-scale shepherding in the past, the Downs in Surrey have always retained a more significant proportion of their ancient woodland. The *Surrey Habitat Framework* estimates the present areal extent to be 307 hectares or 0.2% of Surrey, occurring as multiple fragmented units averaging around one hectare in size. Protected sites include the internationally important Mole Gap to Reigate Escarpment Special Area of Conservation. In such sites 46.3% of the habitat is reckoned to be in favourable and 45% in recovering condition⁸. Succession or short-term climatic vagaries can rapidly vary the character of chalk grassland and many of its specialist species have quite precise requirements that are difficult to maintain using the effective but relatively blunt tool that is extensive conservation grazing. Invertebrates in particular often have preferred sward heights and strict dependencies on food-plants that are themselves of restricted distribution. These factors and the wholesale losses of the habitat in the past have contributed to the highly localised status of many of these specialists today. Butterflies, moths, flies, beetles and others are all implicated. For example Surrey has important populations of the Straw belle moth and the Adonis blue butterfly, present in just a few places in the Downs. Species such as the Shining pot-beetle now appear to be virtually confined to a small number of sites on Surrey's downland. Plants for which we have a similar responsibility include Ground-pine and Broad-leaved cudweed. The habitat's rich flora

is also celebrated for its wild orchids; no less than 16 species have been recorded from the Chalk in Surrey.

Restorative management under recent collaborative projects such as the Mid-Surrey Downs and Surrey Downlands (Old Surrey Downs), has recovered a significant area of open grassland from encroaching scrub and coarser grasses in recent decades. Maintenance is key however, and there can be no relaxation of grazing, mowing or both if this gain is to be sustained. Over the same period the local branch of Butterfly Conservation has successfully rescued the dwindling Small blue in Surrey and a new phase for this project is set to commence in 2017. Many of the Downs' characteristic species are highly temperature-dependent, being at the edge of an otherwise continental range here and are largely confined to the south-facing escarpment. Although still not clear, climate change is predicted to favour these and is already suggested as the reason for the recent dispersal of the Silver-spotted skipper onto the relatively cooler, north-facing dip slope.

Heathland & mires

As already mentioned Surrey is privileged with a heavy responsibility for the preservation of this iconic habitat in Britain. We owe this to our distinctive geology, in particular the Bagshot Beds in the north-west and the Wealden greensands in the south. Additional outliers occur as 'Chalk heath' on the clay capping the North Downs. Lowland heathland has diminished by an estimated 80% in the UK since its likely zenith around 1800 and our county supports a substantial 13% of the remainder⁹. As the habitat is globally restricted this responsibility is moreover international. The *Surrey Habitat Framework* estimates open heathland, bracken and bog to cover 4,119 hectares or 2.4% of Surrey. The majority is protected within statutory sites, which also have European status; the Thames Basin Heaths and Wealden Heaths Special Protection Areas, and the Thursley, Ash, Pirbright & Chobham Special Area of Conservation. Despite this, much potentially restorable heathland including that beneath coniferous tree plantations and peripheral to these core sites, remains negotiable in the struggle to find enough land for housing development and its supporting infrastructure. Even if no direct threat such pressures can present disturbance issues for sensitive heathland biodiversity from cumulative, additional recreation uses. A clearly-prioritised and relatively well funded programme by the Heritage Lottery Fund enabled the *Surrey's Last Wilderness* project to restore or create c.2,000 hectares of heathland and acid grassland from 2002-2007, exceeding all its targets.

⁸ See; <https://designatedsites.naturalengland.org.uk/SearchCounty.aspx>

⁹ See; Surrey County Council (1980): *A Strategy for Surrey's Heathland*

Semi-Natural Grasslands & Heathland

These habitats have a singular importance in Surrey's impressive biodiversity. They can be amazingly rich places - the rainforests of our latitudes - comprising an intricately complex, subtly gradational yet thoroughly interdependent community of both higher and lower plants alongside myriad specialised invertebrates from every order, often displaying spectacular adaptation and behaviour. There are also a somewhat more modest number of highly characteristic birds and reptiles. The latter include the localised Nightjar, Dartford warbler, Woodlark and Hobby, the extremely rare Curlew plus all six of our native lizards and snakes. The invertebrates include long lists of spiders, beetles, bees and wasps, bugs, dragonflies and hoverflies. Examples of threatened species for which we now appear to have sole responsibility include the Red-barbed ant, the spiders *Cheiracanthium pennyi*, *Enoplognatha oelandica*, *Oxyopes heterophthalmus* and the Great fox-spider, the jewel beetle *Melanophila acuminata*, and the Early sunshiner and Blue plunderer ground beetles. We share responsibility for many others with just a few other counties, including the Bloody spider-hunting wasp, Broken-banded wasp-hoverfly and Large marsh grasshopper, the aquatic bug *Micracanthia marginalis* and the Window-winged caddis fly.

Surrey's wet heathland and bogs have an ancient kinship with the upland moorland confined to modern Britain's north and west. So a major element of their biodiversity represents relict post-glacial species populations a long way from their current heartlands and hence at the margins of climatic tolerance. These will be particularly vulnerable to a warming climate and their eventual extinction could prove unavoidable in the long-term. Many of our long lost bryophytes, as well as the White-faced darter dragonfly and the hoverfly *Anasymia lunulata* are examples of species that have already succumbed to local extinction in this way.

Meadows and acid grasslands

Species-rich grasslands of less extreme soils, managed perhaps for hay-making in mixed farming systems are the least well-audited in Surrey. They occur on our clays and alluvial soils and due to their consistent improvement for agriculture in these flatter lands, are probably relatively scarce. Yet the damper versions host some of our rarest flora, including Green-winged orchid, Narrow-leaved water-dropwort and even Wild daffodil. There is a definite need for a comprehensive survey of these grasslands in order to afford some degree of protection to the best, before they are lost out of ignorance of their very existence.

Acid grassland is usually found in close association with heathland, and where extensive is sometimes referred to as 'grass heath'. It too is often seasonally damp and can also support declining wildflowers such as Chamomile, Pennyroyal and the probably now extinct Small fleabane. Where undisturbed these swards are often important for their autumnal diversity of colourful waxcap, earthtongue and club fungi. At a few places in Surrey it is possible to see several of these grassland types intergrading as part of an intricate mosaic in a single site. Headley Heath is one such place. The *Surrey Habitat Framework* estimates that acid grassland occupies 151 hectares (0.1%); and neutral grassland to cover a mere 33 hectares of Surrey.

Our analysis of the Species of Conservation Concern by their priority habitat associations indicates a 31% proportion of locally extinct; a clear majority 40.3% of threatened and 52% of near-threatened; and 34.7% of declining species are those of open semi-natural habitats (calcareous & acid grassland, meadows or heathland). Heathland-associated wetland adds yet a further 8% (of locally extinct), 8.5% (of threatened), 12.6% (of near-threatened); and 10.6% (of declining species) to these totals.



Low-growing acid grassland can host important communities of colourful waxcap fungi



The Silver-spotted skipper may be benefitting from increasing temperatures associated with climate change

Semi-Natural Grasslands & Heathland



Surrey's highly threatened populations of Broad-leaved cudweed are some of the last few remaining in the country



Nightjars are currently doing well and represent a heathland restoration success story



The Window-winged caddis fly is nationally confined to just two sites on Surrey's heathland mires, as well as in the Shropshire moorlands



Surrey's heathlands host all six of the native snakes and lizards; Sand lizards have benefitted from a carefully targeted reintroduction programme



The Small blue has declined but is responding well to targeted conservation action



Green-winged orchid is now very rare in Surrey, confined to a few meadows in the Low Weald



Wetlands

This spans a rather broad range of habitats with their unifying feature being the essential and more-or-less permanent presence of water. They involve the surface land drainage system itself including our rivers and streams, together with the associated marshland, ditches and wet meadow habitats of their immediate floodplains; our three canals; and a whole inventory of static open water-bodies both large and small. The latter include the huge man-made reservoirs and flooded gravel-pits seen especially in the north of the county, as well as more modestly proportioned meres and ponds occurring throughout. Waterlogged woodland, or fen carr, is considered here although the mires draining heathlands have been discussed previously. The *Surrey Habitat Framework* estimates these types of wetlands to occupy 3,516 hectares or 2.1% of Surrey.



Despite intensive surveys we are still unclear if any wild populations of Water voles remain in Surrey



Many of Surrey's dragonflies have expanded their range in recent decades, including the White-legged damselfly



The rapid spread of Himalayan balsam along Surrey's waterways has contributed to the decline of native wildflowers such as Small teasel

Surrey's two main river catchments are those of the Rivers Wey and the Mole, both tributaries of the Thames with their sources in neighbouring counties. The Eden Brook drains the far east of the county and the Blackwater fills this role in the far west. The Hogsmill is a small catchment on our boundary with Greater London. The headwaters of the River Arun flow in an opposite direction to all the others from a minor catchment in the south of Surrey.

The broad scale of wetlands considered here can obviously present very different habitats for biodiversity, but their common dependency on clean freshwater presents them with similar issues. Wetland habitats have reached their current restricted distribution after centuries of land drainage and reclamation primarily for agriculture. More latterly watercourses were successively modified to move water off the land and out to sea as efficiently as possible. Field ponds and ditch networks, essential in pastoral systems, have been infilled or allowed to silt up as agriculture has declined or moved on. And although water quality standards are far higher than in previous centuries, the initial strides made in cleaning up the water environment have long achieved stasis, compromised by the limitations of sewerage systems and the growing demands of water consumers. Therefore water basically remains polluted, especially by the chemical phosphate and nitrate left after waste treatment and residues of fertilisers used in agriculture. These make eutrophication (stagnation) a constant threat to the aquatic ecosystem. Meanwhile we are in a high water consumption area and this demand is met by abstraction directly from the environment. During extended drought periods rivers can run dry because of this, especially in their upper reaches, while pollution is made worse by the constraints to dilution. The compounding influence of future climate change on this situation can well be imagined. Wetland biodiversity is of course impacted by both poor water quality and quantity. Mass fish kills are the first obvious sign of pollution events but the effects on invertebrate communities are equally dramatic, involving molluscs, the 'riverfly' groups and others.

Wetland habitats are especially exposed to invasive species introduced into the environment either intentionally or by accident from abroad. The growing list of these includes many wetland plants and also invertebrates. The plants can rapidly dominate waterbodies to the exclusion of native vegetation, which can then de-stabilise the aquatic ecology. Notorious culprits are New Zealand pygmy-weed, Parrot's-feather, Floating pennywort and Himalayan balsam. Declines in some Surrey wild plants can be directly attributed to the near-universal spread of the last of these. Small teasel, Greater dodder and Tubular water-dropwort have all been locally affected. The

native White-clawed crayfish is now extremely rare in Surrey, while its widespread alien relatives the highly predatory American signal and Turkish crayfish threaten both it and a host of other native species. Lastly, the rapid demise of the Water vole in inland Britain is a particularly sad loss and we are still unclear as to whether there are any wild populations left in Surrey. The feral American mink is mainly to blame here, another introduced predator originally imported and farmed for its fur but later released into the wild.

New wetland initiatives...

Fortunately wetlands are some of the easiest habitats to restore or create from scratch. The minerals extraction industry has been responsible for much of this work in Surrey, under obligation to return worked-out pits and quarries to some useful purpose combining both biodiversity conservation and recreation. Many of our wetland nature reserves have arisen in this way, including Farnham Quarry (Tice's Meadow) and the Nutfield Marsh and Laleham Lakes complexes. The latest will be the Molesey Wetlands; 60 hectares of open water, wet grassland and reedbeds replacing the redundant water storage reservoirs alongside the River Thames in Elmbridge.

As a member state of the European Union the UK must enact the Water Framework Directive, which requires a near pollutant-free water environment by 2027 via review and delivery of River Basin Management Plans. Defra's Catchment-Based Approach¹⁰ (CaBA) to achieving this has encouraged the formation of delivery partnerships active in every river catchment. In Surrey, the Wey Landscape Partnership and River Mole Catchment Partnership have both made solid progress in returning wetland habitats within these catchments to 'good ecological status', as defined by the Directive. Projects range from watercourse restoration to increasing public awareness of society's responsibility to avoid further pollution and water wastage. Thankfully these efforts are starting to pay dividends, with the welcome return of the Otter to Surrey (residency status still to be confirmed) and increased numbers of Common snipe and other wetland birds on several key sites, including Stoke Meadows at Guildford and The Moors in Holmethorpe. Other bespoke projects have rescued highly threatened species such as the aquatic plant Starfruit, reintroduced to a created pond near Dorking where it now appears to be thriving.

Our analysis of the Species of Conservation Concern by their priority habitat associations indicates a clear majority 39.8% proportion of locally extinct; 17.4% of threatened; 19.3% of near-threatened; and 30.3% of declining species are those of wetlands, including rivers and streams, canals, carr, reedbeds and fens (other than mires), lakes and ponds.

¹⁰ See; Defra (2013): *Catchment Based Approach: Improving the quality of the water environment*



Farmland

Farming in the sense of growing staples is in slow decline in Surrey. There are still significant parts of the county in rotational arable and silage production as well as some remaining pastoralism, but the latter especially has given increasing ground to demands for equestrian livery. The *Surrey Habitat Framework* indicates around 9,518 hectares (5.6%) of Surrey to be in arable and horticulture, compared with a vast 43,446 hectares (26%) in permanent pasture (as 'improved grassland'), grazed or otherwise. Boundary features, much of them farmland hedgerows, account for a further 5.8%.



Although still widespread, farmland birds such as the Yellowhammer have become increasingly localised



A suite of wildflowers associated with historic tillage methods are now reduced to single sites in Surrey, such as the Night-flowering catchfly



Brown hares are inexplicably rare in Surrey, although illegal coursing may have had an impact in the past

The main centres of arable production are on the clay plain north of the Hog's Back, continuing east of Guildford along the A3 corridor and up onto the dip slope of the North Downs; then also as scattered concentrations in the Low Weald south of Dorking, eastwards across the M23 corridor as far as Lingfield. Elsewhere the farmed landscape consists of tightly clustered mosaics of mostly small fields grazed by various livestock, but increasingly horses. There are still some pockets of cattle-raising however, along with novelty herds such as deer and even llamas. The mean size of Surrey farms is well below the national average. Farm diversification is a modern necessity especially for small farms and Surrey also has a growing number of 'hobby' farmers trying out new ventures. For example there has been a recent expansion in viniculture along the North Downs scarp. So in general not a huge proportion of Surrey has been exposed to the desertification of the countryside that is modern factory farming, when compared with many of our neighbours.

Nevertheless we have certainly witnessed depletion in farmland biodiversity. Intensification in arable production has seen local field enlargement and the poor treatment of hedgerows; a relentless move towards regular autumn sowing; and an increasing dependence on pesticides and fertilisers. This all adds up to a more inhospitable countryside for most widespread biodiversity, the trends for which continue to signal steady declines. In Surrey this is borne out by increasingly localised populations of once common farmland birds such as Lapwing and Yellowhammer, while Turtle dove and Grey partridge are fast following the fate of Tree sparrow and Corn bunting, both now extinct in the county. The damage done by improved seed-cleaning and herbicides to the former 'weed' flora of cornfields was set in train decades ago and the majority of these colourful arable plants have become exceedingly rare. The likes of Corn buttercup, Mousetail, Red hemp-nettle, Cat-mint and Night-flowering catchfly are now all reduced to small populations in single localities. 22% of locally extinct higher plants are of this type of habitat, along with 20% of all those Red Listed as threatened in Surrey. Some of our scarcer bryophytes are going the same way. Brown hares are now inexplicably rare in the county, as thriving populations do exist just over the border in Hampshire.

A slowly unfolding collapse in abundance of invertebrate populations, as observed from declines in nationally monitored light-trap catches of moths, in bumblebees, beetles and many other orders, is nothing short of an impending catastrophe. On these we are totally reliant for crop pollination and soil fertility, and

they also dominate a critical tier in all food chains. The indiscriminate use of pesticides in agriculture is suspected to be largely responsible, especially as these can disperse widely beyond their point of application while also accumulating within the environment. The universality of horse livery has had its own impacts on nature and the landscape. Pastures can often be regularly over-stocked, field ponds poached to oblivion and hedgerow maintenance woefully overlooked, while inefficient disposal of manure is a further source of diffuse pollution to local watercourses. Illegal 'fly grazing' can often compound the problem. The growing abandonment of agriculture seen especially on approaches to Greater London furthermore invites urban expansion on 'redundant' farmland, the peripheries of which have often become important local refuges for wildlife.

Stewards of the countryside

Agri-environment schemes have evolved considerably since the end of the last millennium and are in their present guise as Countryside Stewardship, albeit the majority of agreements under predecessor schemes have yet to complete their full term. Their collective success in making the farmed landscape a better place for biodiversity is a debatable issue, although this can indeed be claimed with confidence under many such agreements. Natural England has worked hard in recent years to maximise take-up of stewardship in Surrey. Advisory officers from the government-funded Farming & Wildlife Advisory Group were also actively promoting stewardship in the county until this service was dissolved in 2010. Some continuity in farm advice work has been ensured however, using various vehicles such as the CaBA partnerships mentioned earlier. Several national initiatives have assisted awareness of farmland biodiversity declines and have probably also contributed to the uptake of agri-environment agreements, including the *Campaign for the Farmed Environment*¹¹ as well as the launch of the National Pollinator Strategy in 2016. A new local volunteer wardening initiative of the Surrey Wildlife Trust - 'Hedgerow Heroes' - is intended to specifically address neglect and mismanagement of hedgerows throughout Surrey, but with a heavy focus on farmland in rural areas.

Our analysis of the Species of Conservation Concern by priority habitat association indicates a 7% proportion of locally extinct; 16% of threatened; 6% of near-threatened; and 5.2% of declining species are those of farmed environments. As farmland species represent those that are still relatively widespread rather than the specialists of more restricted habitats, their relative under-representation is not surprising here.

¹¹ See: <http://www.cfeonline.org.uk/home/>



Urban

Being so rich in rural biodiversity, the important contribution made by urban wildlife is perhaps understandably often overlooked in Surrey. Yet around 17% of the county is 'urbanised' and at least 25% of this is estimated to consist of community green spaces and private gardens. Indeed the urban environment can offer an improved sanctuary to some species that for any of reasons discussed earlier are in greater trouble in the countryside.



Urban gardens can offer important sanctuary for the much-loved but declining Hedgehog



Peregrine falcons have increasingly taken to breeding on high-rise buildings in towns & cities



Garden ponds can support important populations of amphibians, dragonflies and other invertebrates

One of these is the Hedgehog. Although possibly due in part to their active predation by Badgers in rural areas, there is also something in the variety of foraging opportunities in gardens, allotments and small urban woodlands to which they are particularly suited. Their ease of movement through this townscape must be ensured, however. Some wildlife is virtually dependent on buildings for breeding, including birds such as the Starling, Swift, House martin and Swallow, as well as many of the commoner bats. The welcome recovery of the Peregrine falcon owes everything to these magnificent birds' recent preference for nesting on high-rise buildings in city and town centres, most publically in recent times at Woking.

Garden wildlife is justly celebrated by many homeowners, who take pride in recording often staggering numbers of species visiting or resident on their property. In *My Side of the Fence*, naturalist Jeremy Early describes the observation of no less than 13 mammals, 53 birds and over 200 bees, wasps and hoverflies in his Reigate garden. The addition of a garden pond boosts lists considerably and can even support populations of declining species such as Common toads and Great crested newts. As the oldest built structures in some of their neighbourhoods, churchyards and cemeteries can retain surprising significance for biodiversity conservation at the local and even national level. Rare wildflowers, ferns, lichens and fungi are often found amongst their ancient swards and funerary stonework. The exceptional Brookwood Cemetery even hosts its own liverwort; the Brookwood crestwort, which to date remains globally unique.

Urban habitats are some of the most threatened by escalating development pressures, with proposals to build over allotments, playing-fields and less glamorous brownfield sites presented as a clearly preferred option over new housing in the Green Belt. Infill development or 'densification' is an ongoing reality, usually to the cost of back gardens and small private communal green spaces. But this represents something of a tension alongside recognition of the parallel importance

of planning for adequate local Green Infrastructure to support our quality of life and well-being, especially in urban centres.

Lastly, the impacts of road transport on wildlife are obvious from the scores of roadkill victims piled on the hard shoulder. These of course are the visible result of habitat fragmentation, but if positively managed for wildlife, transport infrastructure corridors can ironically also offer opportunities for re-connecting habitats. Various enhancement schemes are currently planned to upgrade Surrey's roads network, thus offering the distinct possibility that some of these aspirations might well be realised.

...For Wildlife and People

The wildlife of their immediate neighbourhood, or if they are lucky enough to have one their garden, presents most people's first opportunity to experience the wonders of nature. As the majority of us live in towns, urban nature conservation has a crucial role in both preserving this opportunity and assisting in its interpretation, thus making the experience even more meaningful. The perception that biodiversity is inaccessible within the built environment is certainly challengeable given adequate initiative and experience. The Surrey Wildlife Trust has run various 'People & Wildlife' programmes in recent years including the acclaimed Surrey Greenspace Project in three of the county's larger towns - Guildford, Woking and Redhill - with the principal aim of enhancing these 'doorstep' nature experiences. Currently the Trust is actively promoting approaches to gardening that will maximise benefits to wildlife in partnership with Squires Garden Centres. Alongside this the Trust hopes to launch another of its highly successful Citizen Science surveys to monitor the importance of gardens to biodiversity conservation, including early indicators of climate change.

Nature conservation as investment in Surrey's 'Natural Capital'

In recognition of failures to halt the decline in biodiversity and the unsustainable way in which we continue to exploit our natural environment, the 2011 Government White Paper *The Natural Choice: securing the value of nature* proposed a new policy approach. Underlying this was support for 'greener' approaches to the consumption of natural resources that would be fairer on future generations and limited fundamentally by the regenerative capacities of the environment.

This would be achieved by reforms driving sustainable decision-making in the planning system; by taking Sir John Lawton's recommended *Bigger, Better, More & Joined* landscape-scale approach to recovering biodiversity; and through a monetised re-evaluation of the natural environment's resources as 'Natural Capital', that might be better understood and incorporated as investment-worthy stock into the wider economy. Local Nature Partnerships were a further recommendation of the White Paper, seen as key agencies for advancing this new approach and especially as translators of the natural capital concept with the local business sector.

Natural capital represents the entire stock of natural resources from which Ecosystem Services flow (the latter divided into *Provisioning, Regulating, Supporting and Cultural*), which are essential to human existence and well-being. But for the relationship to continue sustainably we must invest adequately in this natural capital.

In *State of Nature 2016*, Georgina Mace of the Natural Capital Committee muses on the relevance of the biodiversity accounting in the report to the natural capital agenda (see Box 6). She acknowledges that natural capital is a complex concept but cautions against the misconception that the approach only values nature in terms of benefitting mankind, without regard to any notion of intrinsic or ethical worth. She continues by alluding to the need for the natural capital approach to improve articulation of the fundamental connection between a healthy natural environment capable of supplying ecosystem services sustainably, and the quantum of diversity necessary to ensure this with respect to the habitats and species within that environment. Greater clarity here would then enable the conservation sector to use biodiversity as evidence in a natural capital context to its fullest envisaged effect. Whilst we are still developing this evidence, she endorses adopting the Lawtonian vision for a healthy environment via first securing "...coherent and resilient ecological networks" of biodiverse sites spanning the country, as the only sensible and realistic approach.

Natural Capital in Surrey

The Surrey Nature Partnership has published *Naturally Richer: a natural capital investment strategy for Surrey* and has invested in the *Valuing Surrey* project, to begin the mammoth task of realising the wide-ranging contribution of Surrey's natural environment to the local economy. To date this has focussed on a pilot valuation of our woodland assets, setting out a Natural Capital assessment methodology that can be further refined as new data becomes available. Key ecosystem services deriving from woodland in Surrey include timber production ('provisioning'), carbon sequestration, air and water purification, and water absorption (all

'regulating'), and of course also as a recreational venue ('cultural'). Given all this it is a relatively easy step to further the case for upscaling sustainable woodland management across the county. *Valuing Surrey* has also begun exploring the value of the county's wetlands in natural flood alleviation, as well as the benefits to health of urban greenspace. The partnership plans to produce a Natural Capital Investment Plan in 2017.

6. What is Natural Capital?

"Natural capital refers to the elements of nature that produce value (directly and indirectly) to people, such as the stock of forests, rivers, land, minerals and oceans. It includes the living aspects of nature (such as fish stocks) as well as the non-living aspects (such as minerals and energy resources). Natural capital underpins all other types of capital (manufactured, human and social) and is the foundation on which our economy, society and prosperity is built. By combining different forms of capital, we are able to enjoy a huge variety of benefits; ranging from the food we eat and water we consume in our homes to outdoor experiences and improved health to name but a few. If properly measured and managed, natural capital (the living aspects at least) can continue to provide these benefits indefinitely. The problem is that whilst some of the benefits can be measured and are clear to see (for example, timber has a market price), most are difficult to quantify and are often invisible in our day to day lives despite being critical to our wellbeing." (source: Natural Capital Committee).

"...How does [natural capital] connect to species and habitat conservation? Conservation often aims for a state of the environment that is relatively undisturbed by people, or one that closely matches a recent benchmark, such as in this report, which looks at changes over recent decades. For nature conservation to easily translate into the natural capital agenda we need to ensure that it is part of the analysis at a landscape, seascape and ecosystem scale; that it is not just an output measured as counts of species and areas of habitat, but that it is evidence of functioning and resilient species and habitat assemblages. Importantly, this needs to connect to larger-scale ambitions for nature at the local, as well as regional and national, level." (Professor Georgina Mace, *Natural capital: valuing our nature*, in *State of Nature 2016*).

Conclusion

We hope this brief but timely overview of the past achievements, present issues and future opportunities for biodiversity conservation in Surrey may serve as a solid platform to explore our options and capacities for action going forward. It is surely a time of great uncertainty for the environmental movement. Some of the weightiest foundations supporting our existing strategy will eventually be removed, in the least by name, through our leaving the European Union. So we must strongly defend both the principles these espouse and their legacy in a post-Brexit Britain. At the same time we are entering a new phase and scale of development to deliver housing and related infrastructure across the county. Our resources will be stretched ever tighter to ensure these proceed as sustainably as possible, by incurring no further losses to Surrey's biodiversity but instead offering opportunities that result in a genuine net gain.

Returning to the previous section, we have a county response to Sir John Lawton's *Making Space for Nature* recommendations as set out in the Surrey Wildlife Trust's *Living Landscapes Strategy*. Their earlier 2010 document *A Living Landscape for Surrey* justified the policy for taking a landscape scale approach to a wide audience throughout Surrey. In brief, we have put great faith in promoting Surrey's Biodiversity Opportunity Areas as the preferred foci for implementing biodiversity enhancements to deliver net gain. These are the places where improved habitat

management, as well as the targeted restoration and creation of priority habitats will be most effective in restoring connectivity for the recovery of priority species in a fragmented landscape. They are therefore the basis for achieving a coherent and resilient ecological network within and beyond Surrey.

A recent Surrey Nature Partnership document aimed specifically at promoting adoption of Biodiversity Opportunity Areas by Surrey's planning sector is starting to prove its worth. To date, all of the county's District and Borough planning authorities have referred to this while developing their Local Plan policies for biodiversity conservation and Green Infrastructure. This is certainly welcome, but we can no longer rely on policy implementation and regulation alone. We must also influence the initiators of land use changes at their inception. Thankfully environmental responsibility is increasingly gaining its rightful place in the minds of such people and across the sectors they represent. We can soon hope to see business competitiveness extending also to companies' green portfolios, on a par with more conventional assets.

This report with its insights into Surrey's still enviable biodiversity will hopefully provide its many ambassadors with a further, valued advocacy tool whilst engaged in their enthusiastic defence of perhaps the most fundamental of our county's incalculable riches - its natural environment.

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[Further technical references are cited in the appropriate Species of Conservation Concern lists online.]

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Appendix

The State of Surrey's Nature; data research and analysis

The *State of Nature 2016* report uses a combination of changes in species abundance and distribution to provide trends indicating decline, stability or increase over two time periods; long (1970-2013) and short (2002-2013). These changes are detected through national surveillance monitoring (abundance) and/or recording schemes (distribution). Our *State of Surrey's Nature* report is not based on this kind of analysis. Our approach originally set out to achieve a number of related products from the report, the research for which pre-dated publication of *State of Nature 2016*. Even if available it would have been inappropriate to simply lift a 'cut' of the national data appropriate to Surrey. The surveillance monitoring schemes rely on their scale of data collection for statistical robustness, and would become less reliable if applied to an extracted dataset from just a single county. We have in fact used the same data that underlie many of the recording schemes informing distributional change in *State of Nature 2016*, where this is available in publications (including atlases), on the National Biodiversity Network platform or the individual schemes' dedicated websites.

Species 'decline' in our report has been defined for the most part in terms of evidence for range (ie. distribution) contraction, as indicated by the diminishing pattern of a species' records over time. Obviously caution is required with this approach as natural history recording effort can vary considerably and for some groups is in steady decline itself. An 'increase' trend has been concluded when records suggest an expanding range. Where Surrey recorders make a strong contribution to the national surveillance monitoring schemes, we have actually chosen to refer to national trends in abundance change when assigning local status to the relevant species groups, notably bats and certain other mammals, as well as breeding birds. This is also inherent where we directly infer species' threatened status from their respective national Red Lists. One invertebrate group (the butterflies) is comparatively so well recorded on an annual basis in Surrey that local trends in both abundance and distribution are in fact made possible and these have been duly referenced for this report.

The 'perceived threshold of rarity in the county' (an important criterion for species' inclusion as Species of Conservation Concern) will inevitably vary across groups, although we have tried to be as consistent here as possible. Surrey status has been summarised as 'very rare'; 'rare'; 'local'; and occasionally 'locally common', or even 'common'. As a primary criterion for inclusion as SoCC is driven by species' national rarity status (nationally scarce and rarer), a small number of nationally restricted species that are not at all rare in Surrey have become SoCC. 'Very rare' typically applies to species with a single extant known locality, or perhaps two if the second refers to an older, possibly extinct record. 'Rare' is applied to species with two to c. five extant localities, again slightly more if records are older. 'Local' is the most variable status used across groups; generally from six to c.15 extant localities for less well-recorded groups but more for some better recorded groups, and sometimes if this status has been suggested by an independent published source. 'Locally common' applies where species are obviously range-restricted but relatively frequent within that range. 'Common' means occurring frequently throughout Surrey and only involves those species that are otherwise nationally restricted. 'Surrey responsible' has been subjectively applied to species for which we hold a major/ significant proportion of the national population; or an isolated, disjunct population, perhaps at the edge of the species' current national range ('EoR').

A factor used to limit the species groups considered in the report is the availability of IUCN Red List Criteria reviews. These provide current information on the threatened status of species nationally/internationally and are an invaluable reference source offering confirmation of suggested local trends, as interpreted from datasets underlying national recording schemes. The considered groups therefore include;

- Vascular plants (using the 2014 Red List for England); Charophytes; Bryophytes; Lichens.
- Non-marine Mollusca; Millipedes & Centipedes (Myriapoda) & Woodlice (Isopoda); Mayflies (Ephemeroptera); Dragonflies (Odonata); Stoneflies (Plecoptera); Grasshoppers & allies (Orthoptera); Shieldbugs & allies (Hemiptera); Aquatic & Semi-aquatic bugs (Hemiptera); Butterflies (Lepidoptera); Caddis flies (Trichoptera); Hoverflies (Diptera); 46 families of Beetles in six sub-groups (Coleoptera).
- Breeding birds¹²; Reptiles; Amphibians; Mammals; Fish.

It was also possible to include Spiders (Araneae) using pre-publication reference material (Harvey, *P. pers. comm.*). Species within the groups considered for the report include all those assumed as belonging to the native flora and fauna of Surrey ('administrative' county). This includes natural colonisation by native UK species, but excludes species introduced by human agency (termed 'aliens'). In the case of plants, 'archeophytes' (ancient introductions) were included. Where the original method of arrival of certain species is not clear, we have made assumptions veering towards inclusion in this regard. Extinction is also a naturally-driven process and where the only evidence for a species' native status is provided from fossil/sub-fossil records, these are also excluded from the analysis. Treatment of taxonomic revisions and origination of sub-species follows that within respective references.

Species of Conservation Concern lists have also been produced for the following groups with no IUCN Red List review; Larger moths (Lepidoptera), Aculeate hymenoptera (Bees, Ants and Wasps) and the Dipteran groups Crane flies, Soldierflies & allies, Conopidae and Picture-winged flies. These were chosen by the availability of local atlases for most, and to provide contextual reference for groups including Surrey Priority/Species of Principal Importance. The SoCC list for Birds also incorporates species of concern that winter regularly in Surrey.

To compare and understand the types of habitats most associated with extinct and 'at risk' species in Surrey, the Species of Conservation Concern were first ascribed priority habitat associations (multiple where appropriate). Then the habitat association attributes for all extinct, threatened, near-threatened and declining species were aggregated into the broad habitat categories (Woodland & parkland; Semi-natural grasslands & Heathland; Wetlands; and Farmland) for quantification and analysis. Heathland-associated wetland (ie. valley mires) has been kept as a separate category to allow for consideration with either the Semi-natural grasslands & Heathland, or the Wetlands categories. See **Table 2** and **Figure 5** in the Appendix.

The Surrey Species of Conservation Concern lists are published as appended spreadsheets separate to the *State of Surrey's Nature* report, available only as an electronic download. **Table 1** shows the compiled data table behind **Figures 1-3**.

¹² Analysis of breeding birds used the RSPB/BTO 'Red' & 'Amber' lists as equivalent to threatened and near-threatened status respectively.

Table 1: Combined data-table State of Surrey’s Nature

	All species Surrey	%	SoCC Surrey	%	SoCC extant	%	SoCC Threatened	%	SoCC Near- threatened/ declining	%	SoCC declining	%	SoCC stable	%	SoCC increasing	%	Surrey responsible	Priority/SPI England	Priority/SPI Surrey	Priority/ SPI Surrey	Priority/SPI & in decline
Vascular Plants	975	100	436	44.7	85	8.7	351	36	94	9.6	54	5.5	136	13.9	59	6	45	152	66	21	43
Bryophytes	467	100	179	38.3	67	14.3	112	23.9	6	1.3	6	1.3	68	14.5	21	4.5	11	77	14	7	7
Charophytes	15	100	15	100	5	33.3	10	66.6	1	1.6	1	1.6	8	53.3	0	0	1	9	3	2	1
Lichens	465	100	114	24.5	31	6.7	83	17.8	4	0.8	5	1	12	2.6	62	13.3	0	97	15	8	6
Total:	1922	100	744	38.7	188	9.8	556	28.9	105	5.5	66	3.4	224	11.6	142	7.4	19	61	29	9	5
Fungi																					
Invertebrates	135	100	53	39.2	13	9.6	40	29.6	1	0.7	1	0.7	31	23	7	5.2	0	17	7	4	2
Mollusca																					
Crustacea																					
Myriapoda/Isopoda	79	100	36	45.5	8	10.1	28	35.4	0	0	0	0	0	0	28	35.4	0	3	1	1	0
Arachnida	417	100	293	70.3	43	10.3	250	60	14	3.4	6	1.4	108	25.9	107	25.7	15	31	16	6	8
Insecta	34	100	18	52.9	5	14.7	13	38.2	2	5.9	0	0	2	5.9	9	26.5	0	2	2	1	0
Ephemeroptera	36	100	21	58.3	2	5.6	19	52.8	1	2.8	1	2.8	8	22.2	8	22.2	5	2	0	0	0
Odonata	14	100	13	92.8	0	0	13	92.8	1	7.1	0	0	0	0	12	85.7	0	1	0	0	0
Plecoptera	29	100	19	65.5	1	3.4	18	62	1	3.4	1	3.4	2	6.9	10	34.5	4	3	1	0	2
Orthoptera & allies	46	100	32	69.5	3	6.5	29	63	0	0	0	0	12	26	9	19.6	8	0	0	0	0
Shieldbugs & allies	57	100	29	50.8	7	12.3	22	38.6	2	3.5	0	0	2	3.5	15	26.3	3	10	0	0	0
Aquatic Bugs																					
Homoptera (part)																					
Butterflies	50	100	29	58	9	18	20	40	8	16	3	6	2	4	4	8	3	23	16	6	7
Moths																		142	96	12	7
Trichoptera	123	100	81	65.8	29	23.6	52	42.2	1	0.8	0	0	22	17.9	27	21.9	2	4	3	2	1
Craneflies	> 75																	8	6	1	0
Soldierflies & allies	99																	13	5	3	0
Conopidae	19																	1	0	0	0
Syrphidae	205	100	93	45.4	6	3	87	42.4	2	1	6	2.9	38	18.5	34	16.6	7	4	2	0	2
Picture-winged Flies	9																	0	1	0	0
Bees	220																	17	11	7	1
Ants	34																	7	4	0	2
Wasps	223																	7	4	0	3
Ground Beetles	232	100	158	68.1	48	20.7	110	47.4	6	2.6	7	3	58	25	37	15.9	2	27	13	3	10
Leaf Beetles	217	100	110	50.6	27	12.4	83	38.2	5	2.3	2	0.9	31	14.3	38	17.5	7	10	6	2	4
Soldier Beetles & allies	74	100	48	64.8	9	12.2	39	52.7	1	1.4	4	5.4	6	8.1	23	31	5	1	0	1	1
Darkling Beetles	96	100	69	71.8	13	13.5	56	58.3	6	6.2	1	1	9	9.4	34	35.4	6	3	3	0	0
Water Beetles	197	100	127	64.5	27	13.7	100	50.7	0	0	4	2	15	7.6	60	30.4	21	2	2	2	0
Scarabs & Chafers	69	100	50	72.4	17	24.6	33	47.8	2	2.9	3	4.3	7	10.1	17	24.6	4	2	1	0	0
Other beetles																		38	9	7	2
Total:	2110	100	1279	60.6	267	12.7	1012	47.9	53	2.5	39	1.8	346	16.4	479	22.7	95				
Birds Breeding		100	82	64.6	19	15	63	49.6	25	19.7	12	9.4	2	1.6	13	10.2	11	49	39	14	15
Amphibians	6	100	3	50	0	0	3	50	0	0	0	0	3	50	0	0	0	4	3	0	3
Reptiles	6	100	6	100	0	0	6	100	0	0	0	0	3	50	1	16.7	2	6	6	0	3
Mammals	44	100	29	65.9	7	15.9	22	50	2	4.5	1	2.3	6	13.6	8	18.2	5	19	16	5	8
Fish	27	100	12	44.4	5	18.5	7	25.9	2	7.4	0	0	1	3.7	4	14.8	0	5	2	3	3
Total:	210	100	132	62.8	31	14.7	101	48	29	13.8	13	6.2	15	7.1	26	12.3	18	943	404	126	150
Plants & Lichens	1922	100	744	38.7	188	9.8	556	28.9											%	31.2	37.1
Invertebrates	2110	100	1279	60.6	267	12.7	1012	47.9	53	2.5	39	1.8	346	16.4	479	22.7	95				
Vertebrates	210	100	132	62.8	31	14.7	101	48	29	13.8	13	6.2	15	7.1	26	12.3	18				
All Species	4242	100	2155	50.8	486	11.5	1669	39.3	187	4.4	118	2.8	585	13.8	647	15.2	132				
Extant All Species	3756	100					1669	44.4	187	5	118	3.1	585	15.6	647	17.2	132				

Appendix

Figure 5: Priority habitat associations analysis for extinct and 'at risk' species

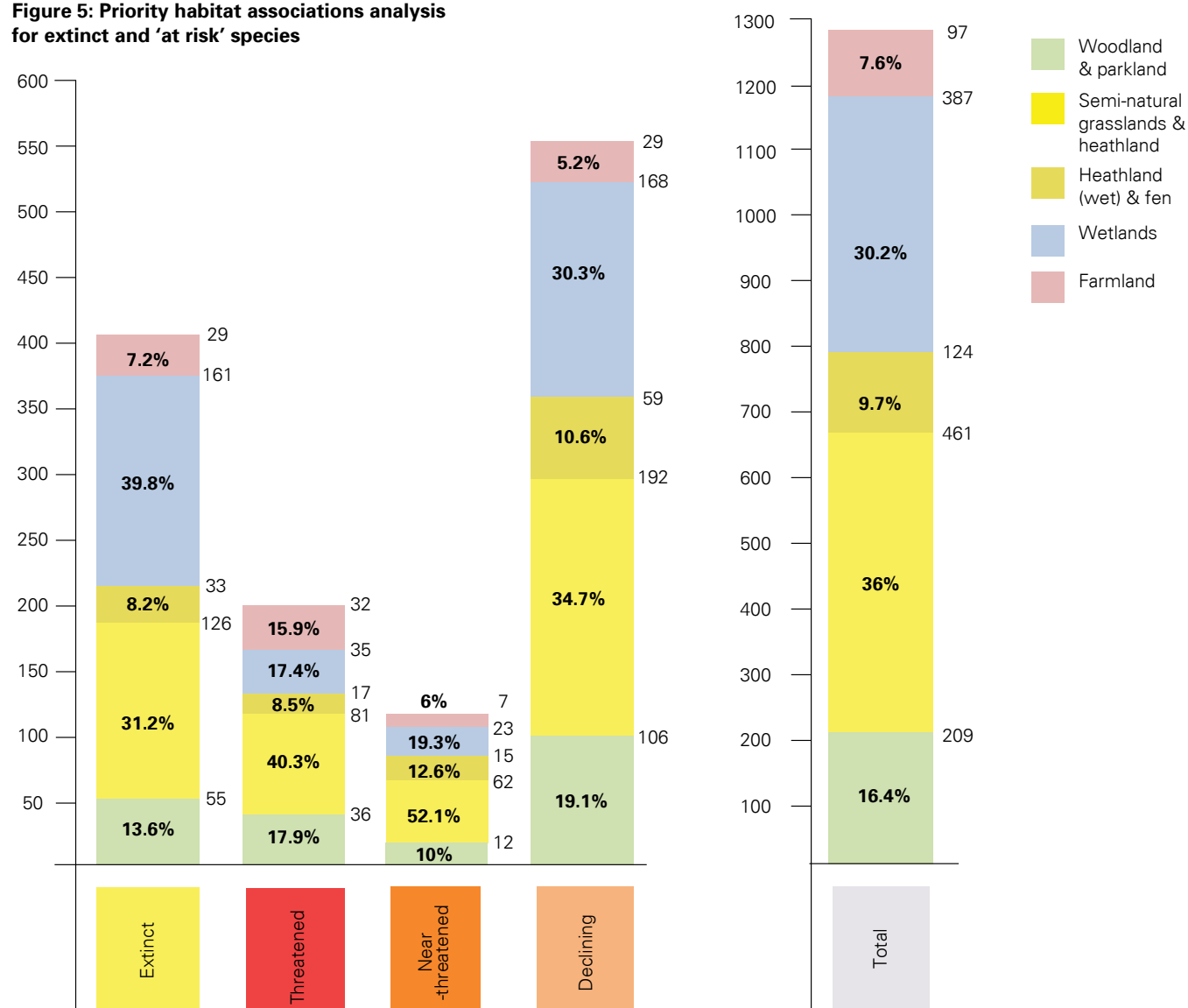


Table 2: Priority/Habitats of Principal Importance occurring in Surrey

This report's broad habitat categories	'Broad' HPI categories	Priority/Habitats of Principal Importance
Woodland & parkland	Woodland	Lowland Beech & Yew woodland
		Lowland mixed deciduous woodland
		Wood-pasture & parkland
		Wet woodland
Wetlands	Freshwater	Rivers
		Ponds
		Eutrophic standing waters
	Wetlands	Floodplain grazing marsh
		Reedbeds
		Lowland fens (incl. valley mires)
Semi-natural grasslands & heathland	Heathland	Lowland heathland
	Grassland	Lowland calcareous grassland
		Lowland dry acid grassland
		Lowland meadows
Farmland	Arable & horticulture	Arable field margins
		Traditional orchards
	Boundary	Hedgerows
Urban	Inland rock	Open mosaic habitats on previously developed land (incl. some 'Brownfield')
		Inland rock outcrops & scree





Surrey Nature Partnership

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Surrey Nature Partnership's Biodiversity Working Group is helping to protect biodiversity in Surrey in alignment with Defra's current England *Biodiversity 2020* strategy, in a challenging environment where over 40% of priority habitats and 30% of priority species are declining nationally. The group has replaced the steering group of the former Surrey Biodiversity Partnership, which drove implementation of the Surrey Biodiversity Action Plan from 1999-2010. Members include representatives from Natural England, the Forestry Commission and the Environment Agency, Surrey County Council and the Surrey Boroughs and Districts, Surrey Wildlife Trust, SBIC, The National Trust, RSPB, Surrey Botanical Society, Butterfly Conservation, the Surrey Bat Group and others.

Download this document from surreynaturepartnership.org.uk/our-work

Reference: Waite, M (2017); The State of Surrey's Nature (Surrey Nature Partnership).