

# Duty To Co-operate

## Statement of compliance

November 2024



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# 1 Introduction

- 1.1 The Duty to Cooperate (DtC) requires local authorities to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.
- 1.2 This Statement of Compliance has been prepared by Epsom & Ewell Borough Council to demonstrate how it has met the requirements of the DtC in relation to the Local Plan (2022 to 2040). It sets out the strategic issues which have been identified and outlines the ways in which the council has engaged effectively with representatives of other DtC bodies that are prescribed in the relevant legislation, as well as the ways in which the outcomes of the cooperation have informed the direction of the policies in the draft Local Plan.
- 1.3 This statement records activities undertaken as part of the preparation of the Epsom & Ewell Local Plan up until the Regulation 19 Stage (November 2024). Prior to the submission of the draft Local Plan, the council will prepare a Supplementary Statement that sets out any activities undertaken between the date of this compliance statement and the submission of the draft Local Plan. This will also include updates on any new issues arising and issued resolved.
- 1.4 The council will agree several Statements of Common Ground (SoCG) with authorities and other DtC partners following the Regulation 19 (publication of a local plan) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is intended that all Statements will be agreed and appended to the Supplementary Statement prior to the submission of the draft Local Plan for Examination.

## 1.1 What is the Duty to Cooperate?

- 1.1.1 The DtC responsibility on local authorities was created in the 2011 Localism Act and amends the 2004 Planning and Compulsory Purchase Act. Section 33A of the Planning and Compulsory Purchase Act places a legal duty on local planning authorities in England to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. The DtC is not a duty to agree but planning authorities are expected to make every effort to secure the necessary cooperation on strategic cross-boundary matters before Local Plans are submitted for examination.
- 1.1.2 For the purposes of the DtC, a strategic matter is defined as sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is

strategic and has or would have a significant impact on at least two planning areas.

1.1.3 The National Planning Policy Framework 2023 states, in paragraph 27, that “In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.”

1.1.4 The National Planning Practice Guidance provides further guidance on SOCG and gives detailed advice on how local planning authorities and other bodies should respond to the DtC. It states that the DtC is a legal test that is separate from, but related to, the Local Plan test of soundness. The Local Plan examination in public will test whether a local planning authority has complied with the DtC. The planning inspector can recommend that the Local Plan is not adopted if the duty has not been complied with. If the inspector is satisfied that the local planning authority has complied with the DtC the examination will proceed to consider whether the plan is sound. To assist in the assessment as to whether a local planning authority has complied with the DtC, the Planning Inspectorate recommends<sup>1</sup> that a Statement of Compliance with the duty be submitted, along with any SOCG.

## 1.2 Defining Duty to Cooperate bodies

1.2.1 The Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended) set out the DtC bodies, with those being relevant to the Council being identified in table 1 below.

Table 1: The Council's DtC Prescribed bodies

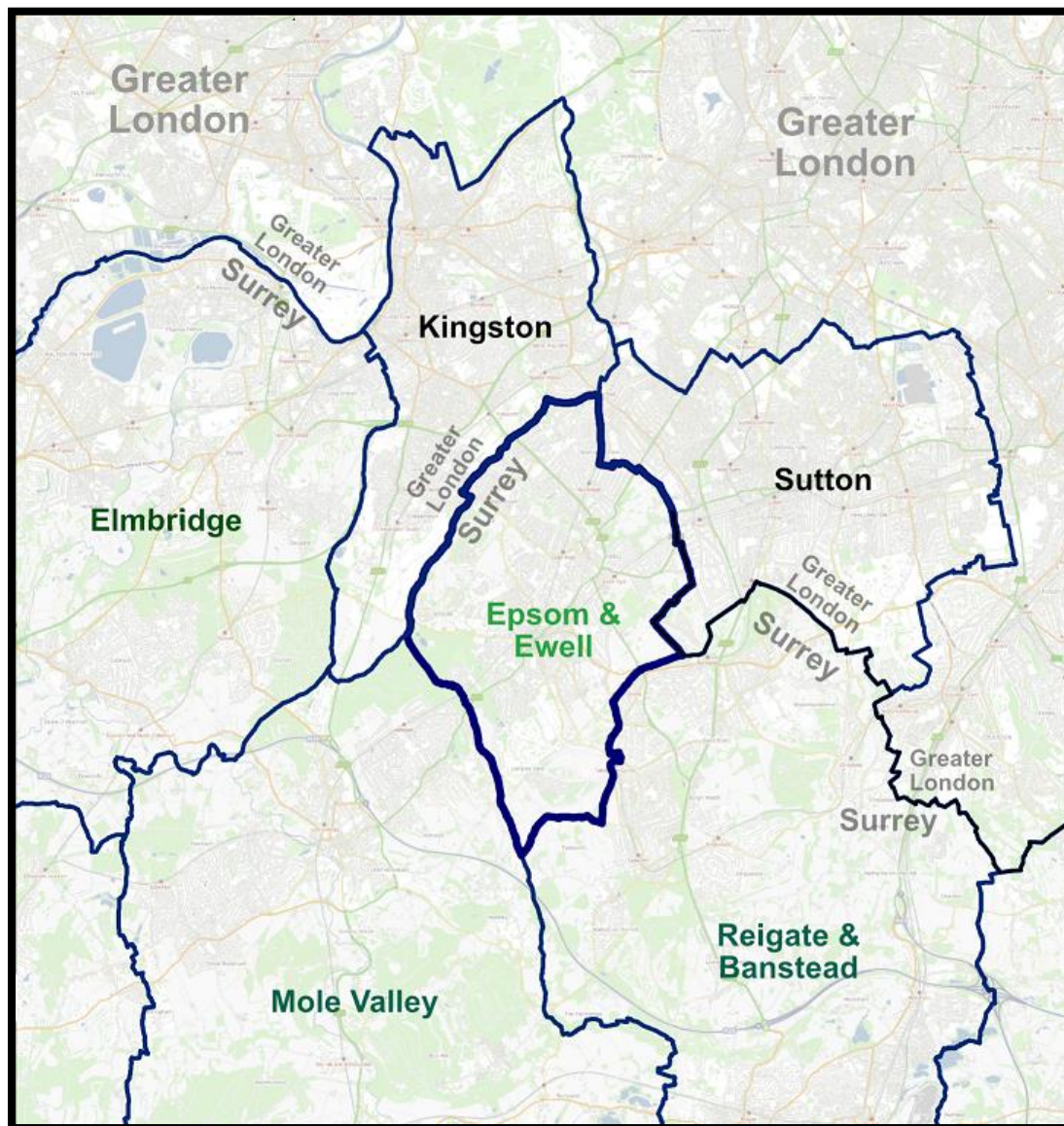
<b>As named in the Act and Regulations</b>	<b>As named in relation to Epsom &amp; Ewell Borough Council</b>
Upper tier authority	Surrey County Council
Adjoining authority	Reigate & Banstead Borough Council
Adjoining authority	Mole Valley District Council
Adjoining authority	Royal Borough of Kingston Upon Thames
Adjoining authority	London Borough of Sutton
Adjoining authority	The Greater London Authority (GLA)/Mayor of London
The Environment Agency	The Environment Agency
Historic Buildings and Monuments Commission for England	Historic England
Natural England	Natural England

<sup>1</sup> In the [Planning Inspectorate Procedure Guide for Local Plan Examinations](#)

The Civil Aviation Authority	The Civil Aviation Authority
The Homes and Communities Agency	Homes England
Primary Care Trusts	Surrey Heartlands Integrated Care Board
Office of Rail Regulation	Office of Road and Rail
Highways Authority	Surrey County Council National Highways
Local Enterprise Partnership	Formerly Coast to Capital Local Enterprise Partnership, responsibilities transferred to Surrey County Council from April 2024
Local Nature Partnership	Surrey Nature Partnership

1.2.2 The borough of Epsom & Ewell is a second-tier authority, located within Surrey County Council, and adjoins four other second tier authorities (which includes two London boroughs). It shares a border with Greater London. The position of Epsom & Ewell in relation to surrounding authorities is shown in Map 1.

Map 1: Location of the borough of Epsom & Ewell



1.2.3 In terms of health, it lies within the wider Surrey Heartlands Integrated Care Board area. It was within the Coast to Capital Local Enterprise Partnership (LEP) area, although the role of the LEP was transferred to Surrey County Council from April 2024. The local nature partnership is the Surrey Nature Partnership.

### 1.3 Existing mechanisms for engagement

1.3.1 The Council 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 requirement 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 and while these groups/partnerships cannot be exclusively relied upon to meet the DtC, they provide an ongoing framework for maintaining awareness of cross-boundary issues to the participants:

1.3.2 *The Surrey Planning Officers Association (SPOA)*

SPOA comprises the Heads of Planning service from the eleven Surrey district and boroughs and Surrey County Council.

1.3.3 *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.

1.3.4 *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.

1.3.5 *Joint Place Team arrangements between Surrey CC & the Council*

Regular meetings are held to discuss a variety of planning related issues.

1.3.6 *Surrey Infrastructure Steering Group (SISG)*

The SISG brings together key players who can contribute to and play an active role in coordinating their work to promote, drive and unblock barriers to the provision of infrastructure that supports good growth. The Surrey Infrastructure Steering Group (SISG) replaced the Surrey Future Steering Board in 2022.

The overall focus and objectives for the SISG are to:

- 1) Align infrastructure and investment priorities and spatial planning interests.
- 2) Provide a focus on delivery and clear outputs/outcomes through a collective effort in tackling key challenges.
- 3) Ensure the Surrey voice is heard.

1.3.7 *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.

1.3.8 *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.

**1.3.9 *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.

**1.3.10 *Surrey Health and Planning Task Group***

Group comprising Surrey County Council public health and local planning authorities. Quarterly meetings to discuss and ensure local health and wellbeing priorities are integrated effectively into the planning system and local plans.

**1.3.11 *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.

**1.3.12 *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.

## **1.4 Recording DtC engagement and activities**

1.4.1 The Council has been undertaking activities which count towards to the DtC since 2012, when the DtC requirement was introduced. The activities have occurred either through meetings with prescribed bodies or commenting on plan preparation and consultations from prescribed bodies. When work on Epsom & Ewell's new Local Plan gained momentum, the Council sought a more formal method to help identify strategic matters/issues and document engagement activities on these.

1.4.2 As such, a DtC 'framework' was drafted and the Council's DtC bodies were consulted on the framework in May/June 2022, to ensure there was consensus on the matters/issues which had been identified and who the relevant DtC partners were for each. The framework was published on the Council's website in September 2022 and an updated

version in January 2023, just prior to the Regulation 18 draft Local Plan consultation.

1.4.3 Since this time, the Council has continued to use the framework to document engagement and activities on the strategic matters/issues and it has formed the basis of this statement of compliance. The next section provides details on the strategic matters/issues and the engagement and activities which have taken place. It specifically:

- 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 matters/issues relevant to the Borough and its Local Plan upon which there has been, and will continue to be, engagement with the DtC bodies. Provides an overview and the status of each issue.

## 2 Local Plan strategic matters/issues

2.1 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.

2.2 It is not a given however that all the above require extensive cooperation and a SoCG. 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: 61-015-20190315).

2.3 The Council has identified in consultation with its DtC partners, the strategic cross boundary matters/issues where cooperation and engagement are needed. These are set out in the following sections. It should be noted that this is not an exhaustive list and that there numerous other topic areas where cooperation with partners has been and will be required, which are addressed through evidence gathering and formal/informal consultation on the Local Plan.

### 3 Identified strategic cross boundary matters/issues

3.1 The following section sets out the strategic cross boundary matters/issues which are addressed in the Council's Local Plan. It provides an overview of the matters/issues, identifies who the relevant DtC partners are, the engagement activities which have been undertaken and the status of the matter/issue.

#### **STRATEGIC CROSS BOUNDARY MATTER**

##### **3.1 Meeting identified housing needs within the borough and wider unmet housing needs.**

#### **Overview of issue**

Evidence to date suggests that the Council 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 (November 2024) of local planning authorities in Surrey and those adjoining EEBC in relation to Local Plans and housing delivery.

#### **Current Position**

Based on evidence, the spatial strategy within the Regulation 19 Proposed Submission Local Plan sets a housing requirement of 4,700 dwellings over the plan period. This results in an unmet need of approximately 5,500 dwellings against the standard method.

#### **Background**

As previously required by the NPPF, the Council prepared a Strategic Housing Market Assessment (SHMA) (2016) in partnership with those authorities within its housing market area (HMA)<sup>2</sup>. This identified a significant uplift in housing need across the HMA, particularly for affordable homes. The need for the borough was identified as 418 new dwellings per annum (dpa). For context, the adopted Core Strategy (2007) contains a housing target of 181 dpa for the period up to 2022.

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

The Council has been gathering evidence to identify how to sustainably accommodate this significantly increased housing need. This includes a

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

Land Availability Assessment (LAA) (2022 & updated September 2024), Housing and Economic Development Needs Assessment (HEDNA) (2023) and Green Belt Study (2023 and November 2024). 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. As such, 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.

In November 2022, when work on the first iteration of the LAA was largely complete, the Council wrote to its relevant DTC partners with regards to the borough's housing land supply position. Given the significant shortfall, the request was also sent to those authorities beyond Surrey and the London Metropolitan Green Belt.

The request for assistance broadly summarised the findings of the LAA, setting out that the borough's urban area could potentially accommodate 3,849 dwellings which would equate to 37% of the calculated housing need. Following the close of the consultation, eleven authorities responded with none being able to assist in meeting the Council's unmet needs. A list of the authorities who were contacted, a copy of the letter and a summary of the responses is set out in appendix 2.

The Council carried out a Regulation 18 draft Local Plan consultation in February/March 2023. This identified the Council's preferred spatial strategy which sought to deliver around 5,870 new dwellings across the plan period, which equates to approximately 56% of the need established by the standard methodology. This comprised approximately 3,700 new dwellings within the urban area (assuming the identified urban sites were suitable and could be delivered) and 2,175 through the release of just under 3.6% of the borough's Green Belt. The Council's DTC partners were consulted on the draft plan.

Following the Regulation 18 draft Local Plan consultation, the Council carried out further work on the evidence base which included reviewing and updating the LAA. This provided the opportunity to:

- identify new sites (through an additional 'Call for Sites' exercise and identify any which had arisen through the planning system since the previous LAA was prepared),
- review existing sites to ensure they were deliverable (landowners were again contacted to confirm availability) and,
- ensure sites were being optimised (considering the individual context of each site).

The updated LAA showed that the housing land supply position had worsened slightly with fewer urban sites being confirmed as available. The deliverable/developable urban sites could meet 34% of the need identified by the standard method. Several Green Belt sites were submitted for consideration through the Local Plan process, and these were assessed

through the LAA to ensure the study was comprehensive. Regardless of whether exceptional circumstances can be demonstrated, the yield from all these potential Green Belt sites could meet 45% of the standard method's need. As such, based on land availability alone, the borough could only meet 79% of the standard method's need, with over half of this of this being from Green Belt sites.

The Council subsequently held further meetings with neighbouring authorities to establish whether there had been any changes to their land supply positions, which would enable some of the unmet need to be accommodated elsewhere. Additionally, in July 2024 the Council again contacted its relevant DtC partners and those authorities beyond Surrey and the London Metropolitan Green Belt to make similar enquiries. Following the close of the consultation, nine authorities responded with none being able to assist in meeting the Council's unmet needs. A list of the authorities who were contacted, a copy of the letter and a summary of the responses is set out in appendix 3.

The most recent position is that of the local authorities contacted by the council, none can assist with meeting the unmet needs of Epsom and Ewell. While the stage reached in plan making for other authorities is varied, it is apparent that there is likely to be a considerable amount of potential unmet need across the wider region. The main reasons for the local authorities who were contacted being unable to assist included, limited site availability, difficulties in meeting their own housing needs, environmental constraints and if there were to be any potential capacity, this would be utilised to assist in meeting the needs of more closely located local authorities/those within the same housing market area.

In November 2024 the Council published its Regulation 19 Proposed Submission Local Plan, which contained a housing requirement informed by a suite of evidence. The housing requirement is for 4,700 dwellings over the plan period, which results in an unmet need of approximately 5,500 dwellings against the standard method.

The council will remain engaged with its DTC partners on this matter.

## **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 and includes some Green Belt sites. There is therefore a shortfall of approximately 1,700 dwellings over the plan period 2020 to 2037.

EEBC and MVDC signed a Statement of Common Ground (2021) (available in appendix 4), which established that neither authority was in a position to accommodate each other's unmet needs. MVDC confirmed they were unable to assist in meeting EEBC's potential unmet need in December 2022 in response to a formal request from EEBC and again through their response to the Regulation 18 consultation.

A DtC meeting held between EEBC & MVDC (May 2024) provided a further opportunity for discussions on housing land supply positions and latest/emerging evidence. MVDC confirmed that their housing land supply position remained the same – both authorities are unable to assist in meeting needs arising from another authority.

### **Reigate & Banstead Borough Council (RBBC)**

RBBC is a neighbouring Surrey authority. RBBC adopted their local plan in 2014 which was reviewed in 2019. In response to consultation on this 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.'

RBBC responded to the Regulation 18 draft Local Plan consultation and again confirmed that they would be unable to accommodate part of any other authorities housing need. The issue of unmet need was further discussed at a DtC meeting held between RBBC & EEBC in May 2024. RBBC has since commenced work on a new Local Plan and stated they are due to commence a Call for Sites exercise to inform a LAA. They are anticipating limited availability of sites and are therefore unlikely to be able to assist in meeting 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. RBK intend to conduct a Regulation 19 Local Plan consultation during the autumn of 2024 with the submission of a Local Plan for examination by the end of June 2025.

RBK have written to EEBC (December 2022) seeking assistance in meeting housing needs due to uncertainties surrounding some of their potential sites. RBK responded to the Regulation 18 draft Local Plan consultation and raised concerns that the level of unmet need will place additional

pressure on adjoining borough's housing supply. A DTC meeting held between EEBC & RBK in May 2024 provided a further opportunity to discuss the Regulation 18 comments, housing land supply positions and latest/emerging evidence. It was agreed that it was beneficial to share emerging evidence and that both authorities face constraints resulting in it being unlikely for either authority to help in meeting other's needs.

### **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.

A DTC meeting was held with LBS on 27/9/23, instigated by LBS as they are commencing work on a new Local Plan. The issue of housing need was discussed. LBS's position is that the London Plan identifies a need of 886 dpa (using the London Plan cap and including a 35% urban uplift), which is a significant increase. For context the standard method gives an uncapped need figure for LBS of approximately 2,000 dpa. Many existing large sites have been built out and LBS may need assistance in meeting their housing need and are therefore not in a position to provide assistance to other authorities.

LBS consulted on a Regulation 18 in August/September 2024 to which EEBC responded.

A DtC meeting held between EEBC & LBS (October 2024) provided a further opportunity for discussions on housing land supply positions and latest/emerging evidence. LBS confirmed that work on their LAA is ongoing, but they are anticipating a shortfall in supply so are unlikely to be in a position to assist with meeting needs from other authorities.

### **Authorities which are not adjacent to EEBC but within the HMA**

#### **Elmbridge Borough Council (EBC)**

EBC are within the same HMA as EEBC and consulted on their Regulation 19 draft Local Plan in June/July 2022 with the plan being submitted for examination in August 2023. In October 2024 the Inspector wrote to EBC to advise them to either withdraw the plan or a report will be issued declaring it unsound. The plan sought to deliver 6,780 new dwellings over the 15-year plan period (452 dpa) which would result in a shortfall of 2,925 dwellings against the standard method. 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 help with any external unmet need.

EBC confirmed they were unable to assist in meeting EEBC's potential unmet need in December 2022 in response to a formal request from EEBC. EEBC and EBC signed a Statement of Common Ground (2023) (available in appendix 5), which established that neither authority was in a position to accommodate each other's unmet needs. EBC responded to EEBC's Regulation 18 draft Local Plan consultation, which confirmed this position again.

EEBC and EBC again discussed the issue of meeting housing needs at a DtC meeting held in October 2024. The Inspector for EBC's Local Plan examination issued her interim findings (September 2024), which requires EBC to "revisit the Sustainability Appraisal, the options for meeting housing need and the conclusions drawn in relation to the Green Belt work already completed and consideration of all alternative sites, including the potential release of Green Belt sites, to address the 6,300 housing shortfall." Given this, EBC confirm that their position in being unable to assist in meeting other authorities needs remains the same. The Inspector has since advised EBC to either withdraw the Plan from examination or a report will be prepared declaring the plan unsound.

### **Wider Surrey Authorities**

#### **Guildford Borough Council (GBC)**

#### **Runnymede Borough Council (RBC)**

Runnymede responded to the Regulation 18 consultation and stated that "the functional links between Runnymede and Epsom and Ewell are limited or absent." It was concluded that any unmet housing need from EEBC "could not on a practical level be reasonably met in the borough of Runnymede."

#### **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 have engaged with SCC on the gathering of evidence on housing needs, particularly the HEDNA (2023).

#### **Greater London Authority (GLA)**

The London Plan 2021 identifies the housing targets for each London Borough. It is stated<sup>3</sup> that Greater London is considered as a single HMA

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<sup>3</sup> Paragraph 4.1.2

and it does not identify any surplus capacity to accommodate unmet housing need outside Greater London. The GLA did not respond to EEBC's request for assistance in meeting needs or to the Regulation 18 draft Local Plan consultation.

### **Requests from Other Authorities**

Requests have been received to help meet unmet housing needs from other authorities:

- Royal Borough of Kingston Upon Thames (Letter December 2022)
- 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.

### **Authorities/Organisations Engaged**

For this strategic matter/issue following have been contacted:

Neighbouring authorities:

Royal Borough of Kingston Upon Thames  
Mole Valley District Council  
Reigate & Banstead Borough Council  
London Borough of Sutton

Authorities not adjacent but within the same HMA:  
Elmbridge Borough Council

Wider Surrey authorities:

Guildford Borough Council  
Runnymede Borough Council  
Spelthorne Borough Council  
Surrey Heath Borough Council  
Tandridge Borough Council  
Waverley Borough Council  
Woking Borough Council

Other authorities:

Surrey County Council  
The Greater London Authority

Additional authorities beyond the London Metropolitan Green Belt:  
Slough Borough Council

Royal Borough of Windsor and Maidenhead  
Bracknell Forest Council  
Wokingham District Council  
Hart District Council  
Rushmoor District Council  
East Hampshire District Council  
Chichester District Council  
Horsham District Council  
Mid Sussex District Council  
Crawley Borough Council  
Sevenoaks District Council

### **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**

### **3.2 Meeting the identified need for Gypsy and Traveller accommodation within the borough and wider unmet needs**

#### **Overview of issue**

To secure provision of Gypsy and Traveller pitches to meet the identified need.

#### **Current position**

The Regulation 19 Proposed Submission Local Plan makes provision for an additional 10 pitches which leaves a shortfall of 8 pitches over the plan period against the identified need.

#### **Background**

The Council's Gypsy and Traveller Accommodation Assessment (GTAA) 2022 has identified a need for 10 additional pitches for households that

meet the planning definition<sup>4</sup> over the period 2022 to 2040. The GTAA also identified a need for 8 pitches for households that did not meet the planning definition. There was no identified need for a formal transit site. A Court of Appeal decision in October 2022 has influenced the definition of a Gypsy, Traveller or Travelling Showperson with the government updating national policy contained in Planning Policy for Travellers in December 2023. The definition has reverted to defining travellers as all those of travelling background, not just those who are currently travelling. As such, the need for additional pitches in the borough has risen to 18 to include the needs of those who did not meet the former 2015 planning definition.

This need is set out in the table below by year periods.

Years	0-5	6-10	11-15	16-18	Total
	2022-27	2027-32	2032-37	2037-40	
	12	2	3	1	18

Prior to the 2022 GTAA, there was no identified need for additional pitch provision within the borough. The Council has sought to accommodate the need within the borough in the first instance but given its constrained nature cooperation with neighbouring authorities is required to ensure the need is met.

In November 2022, when work on the LAA was largely complete, the Council wrote to its relevant DtC partners with regards to the borough's Gypsy and Traveller site needs. The letter identified the borough's need for ten pitches by 2040 and stated that while the Council was seeking to meet the need, there may be a shortfall and requested assistance in meeting this need. Following the close of the consultation, eleven authorities responded with none being able to help towards meeting the Council's unmet needs. A list of the authorities who were contacted, a copy of the letter and a summary of the responses is set out in appendix 2.

The Council carried out a Regulation 18 draft Local Plan consultation in February/March 2023, which addressed the need for Gypsy and Traveller accommodation. This reflected the need identified in the GTAA and the potential for this need to be increased following the Court of Appeal decision. The consultation was prior to the government's formal change to the definition of a Gypsy and Traveller.

Draft local Plan Policy S9 sought to safeguard existing provision, also setting out development management criteria for the assessment of any future proposals for Gypsy, Traveller and Travelling Showpeople accommodation.

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

Potential new Gypsy and Traveller accommodation provision was addressed within site allocation draft Local Plan policy SA6: Horton Farm (Greenfield), which included a requirement for a “minimum of 10 serviced Gypsy and Traveller pitches,” as part of the wider site allocation. The DtC partners were consulted on the draft plan.

Following the Regulation 18 draft local Plan consultation, the Council carried out further work on the evidence base which included reviewing and updating the LAA. Part of this involved a further ‘Call for Sites’ exercise and contacting landowners to confirm the availability of sites, to ensure the Council’s understanding of site availability is robust. No further sites were submitted or identified for Gypsy and Traveller use through the LAA update.

The Council subsequently held further meetings with neighbouring authorities to establish whether there had been any changes, which would enable some of the unmet need to be accommodated elsewhere. Additionally, in July 2024 the Council again contacted its relevant DtC partners and those authorities beyond Surrey and the London Metropolitan Green Belt to make similar enquiries. Following the close of the consultation, nine authorities responded with none being able to assist in meeting the Council’s unmet needs. A list of the authorities who were contacted, a copy of the letter and a summary of the responses is set out in appendix 3.

The most recent position is that of the local authorities contacted by the council, none can assist with meeting the unmet needs of Epsom and Ewell. Most are seeking to meet their own needs but have no additional capacity or are struggling to meet their own needs.

In November 2024 the Council published its Regulation 19 Proposed Submission Local Plan. This contained Policy SA35, which allocates 10 pitches within the Horton Farm site allocation. Additionally, policy S8 provides the policy framework against which potential travellers will be considered. This also protects the existing sites and sets out a requirement for provision of traveller pitches on larger unallocated windfall sites.

The council will remain engaged with its DTC partners on this matter.

## **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) (available in Appendix 4), where both parties agreed to seek to meet their

own need for additional Gypsy and Traveller pitch provision. This was prior to the 2022 EEBC GTAA. A MVDC officer was interviewed as part of the GTAA to ascertain the 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.

MVDC confirmed they were unable to assist in meeting EEBC's potential unmet need in December 2022 in response to a formal request, and again through their response to the Regulation 18 consultation.

This issue was further discussed during a DtC meeting held between EEBC and MVDC in May 2024. The change in the planning definition of a Gypsy and Traveller has 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. MVDC stated that it is unlikely that further need from other authorities can be accommodated.

#### **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.

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. The issue of unmet need was further discussed at a DtC meeting between RBBC & EEBC in May 2024. RBBC stated their intention to commission a new GTAA and will be commencing a Call for Sites exercise to assist in identifying potential new sites for Gypsy and Traveller use. RBBC again stated that it was considered unlikely that assistance could be provided in helping to meet needs.

#### **Royal Borough of Kingston upon Thames (RBK)**

The RBK officer interviewed for EEBC's GTAA (2022) identified that the current accommodation provision does not meet the needs of the Gypsies and Travellers living in the Borough of Kingston. The RBK GTAA (2018) identified a need for 44 pitches, which RBK intend to address as part of the local plan.

A DTC meeting held between EEBC and RBK in May 2024 confirmed that RBK are anticipating having unmet need and are unlikely to be in a position to assist in meeting unmet needs from elsewhere.

#### **London Borough of Sutton (LBS)**

Input from the LBS was sought as part of the GTAA (2022). No cross-boundary issues were identified by the LBS officer who was interviewed. It was stated that the LBS will reassess their Gypsy and Traveller need as part of the local plan review, which, as of January 2022, is currently underway.

A DTC meeting was held with LBS on 27/9/23, instigated by LBS as they are commencing work on a new Local Plan. Their GTAA is still underway & LBS will share this when available. Planning permission has been granted for an extension to the Gypsy and Traveller site in Woodcote.

At a further DtC meeting held in October 2024, LBS stated that the GLA had calculated their pitch requirement which identified a need for an additional 15 pitches. LBS anticipate they could meet this need but are unlikely to have any additional capacity to meet needs arising from elsewhere.

### **Authorities within the HMA**

#### **Elmbridge Borough Council (EBC)**

EBC are within the same HMA as EEBC and consulted on their Regulation 19 Local Plan in June/July 2022. This identifies that no additional sites are being proposed for Gypsy, Travellers or Travelling Showpeople. A site with 8 pitches was provided in 2020.

EBC confirmed they were unable to assist in meeting EEBC's potential unmet need in December 2022 in response to a formal request. In their response to the Regulation 18 consultation, EBC welcomed the draft policies in relation to Gypsy and Travellers.

EEBC and EBC discussed the issue of meeting traveller needs at a DtC meeting held in October 2024. The Inspector for EBC's Local Plan examination issued her interim findings (September 2024) and as a result, EBC will review and update their Local Plan evidence base. This is likely to include an update of their GTAA (2020). Until this is complete there is uncertainty as to the level of need and therefore EBC are unable to commit to meeting needs outside of their borough. EEBC and EBC agreed to continue to share information as to this situation and how it evolves.

### **Wider Surrey Authorities**

#### **Guildford Borough Council (GBC)**

#### **Runnymede Borough Council (RBC)**

Runnymede responded to the Regulation 18 consultation and stated that "the functional links between Runnymede and Epsom and Ewell are limited or absent." It was concluded that any unmet gypsy and traveller needs from

EEBC “could not on a practical level be reasonably met in the borough of Runnymede.”

**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 own and manage the two existing traveller sites within the borough. The SCC site manager has confirmed that the existing pitches are overcrowded and cannot be expanded (October 2023).

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

SCC responded to the Regulation 18 consultation and commented that draft policy S9: Gypsies, Travellers and Travelling Showpeople should make reference to the need to provide suitable waste management (including recycling) facilities.

Following a DtC meeting between EEBC and SCC in June 2024, SCC identified that this issue is being considered by the Surrey Leaders and Chief Executives.

#### **Requests from Other Authorities**

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

#### **Authorities/Organisations Engaged**

For this strategic matter/issue following have been contacted:

Neighbouring authorities (all were engaged as part of the EEBC GTAA 2022):

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

Authorities not adjacent but within the same HMA:  
Elmbridge Borough Council

Wider Surrey authorities:  
Guildford Borough Council  
Reigate & Banstead Borough Council  
Runnymede Borough Council  
Spelthorne Borough Council  
Surrey Heath Borough Council  
Tandridge Borough Council  
Waverley Borough Council  
Woking Borough Council

Other authorities:  
Surrey County Council  
The Greater London Authority

Additional authorities beyond the London Metropolitan Green Belt:  
Slough Borough Council  
Royal Borough of Windsor and Maidenhead  
Bracknell Forest Council  
Wokingham District Council  
Hart District Council  
Rushmoor District Council  
East Hampshire District Council  
Chichester District Council  
Horsham District Council  
Mid Sussex District Council  
Crawley Borough Council  
Sevenoaks District Council

### **Mechanism for Engagement**

Contact via the consultants preparing the GTAA 2022.

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**

### 3.3 Supporting the local economy: the horse racing industry

#### Overview of issue

To support the local racehorse training industry, including the racecourse and racehorse training, through the local plan.

#### Current Position

Revisions have been made to the Regulation 18 Local Plan policy informed by consultation responses and discussions with DtC partners. Policy DM8: Racehorse Training Zone is now included in the Regulation 19 Proposed Submission Local Plan.

#### Background

The Borough is an established location for the horse racing industry and horse racing plays an important role in the local economy. The industry is concentrated to the south of the Borough within the Green Belt and there are 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.

EEBC carried out a Regulation 18 draft Local Plan consultation in February/March 2023, which contained draft policy DM6: Equestrian and horse racing facilities. This policy was broadly supportive of the development of new equestrian facilities and identified Equestrian Protection Zones where losses of equestrian facilities would be resisted. DtC partners were consulted on this document.

EEBC has since engaged with The Jockey Club and Mole Valley in the drafting of the Regulation 19 Local Plan equestrian policy. The Regulation 19 Proposed Submission Local Plan contains a revised policy DM8 which reflects these discussions and has a greater focus on the racehorse training industry. A Racehorse Training Zone is identified on the policies map.

#### PARTNERS AND CONSIDERATIONS

##### Adjoining authority

##### **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 the industry. 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.” It was 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 has since included this in the Regulation 18 draft Local Plan.

MVDC responded to the Regulation 18 draft Local Plan consultation and were supportive of the policy approach and its consistency with the proposed horseracing training zone in the emerging MVDC Local Plan. It 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.

At a DtC meeting held between EEBC and MVDC in May 2024, EEBC confirmed that the Jockey Club had responded to the Reg 18 consultation which would be considered. It was agreed that EEBC and MVDC are still aligned in their position on this issue.

### **Organisation with linkages to strategic issue**

#### **The Jockey Club and Jockey Club Estates**

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.

The Jockey Club provided a comprehensive response to the Regulation 18 draft Local Plan consultation and were broadly supportive of the inclusion of a such a policy. Several recommendations were made to amend/include policies. These included the following:

- Include reference to the horseracing industry in policies S1 (Spatial Strategy) and S11 (Economic Development).
- The policy should relate to the horseracing industry only, rather than the non-racing equestrian industry.
- The level of protection of the proposed Racehorse Training Zone (RTZ) should be on a similar level to the borough's Strategic Employment Sites.
- The policy needs to address housing needs specific to the horse racing industry.
- The horseracing industry should be safeguarded from the impacts of developments in and around the RTZ, for example where the safety of racehorses accessing the training grounds is compromised.
- Suggested additions to the RTZ.

EEBC met with representatives from the Jockey Club & Jockey Club Estates in June 2024 to discuss their response to the Regulation 18 draft Local Plan.

#### **Authorities/Organisations Engaged**

Mole Valley District Council  
The Jockey Club

### **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.

DtC meetings with relevant authorities/organisations.

## **STRATEGIC CROSS BOUNDARY MATTER**

### **3.4 Flood risk (principally from surface water)**

#### **Overview of issue**

A significant 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.

There are also several properties, both residential and commercial, that are predicted to be at risk of fluvial flooding from the Upper Hogsmill river and its tributaries.

#### **Current position**

The flood risk policy has evolved, with Policy S16: Flood Risk and Sustainable Drainage in the Regulation 19 Proposed Submission Local Plan addressing this issue. The Level 1 Strategic Flood Risk Assessment (SFRA) and Level 2 (Site Specific) SFRA have informed the policy and relevant site allocations. The Council will continue to engage with partners on this matter.

#### **Background**

The Council, along with partners responsible for addressing flood risk, produced a Surface Water Management Plan (SWMP) in 2011 to identify specific areas of risk and potential mitigation measures. The 2018 Strategic Flood Risk Assessment (SFRA) used Environment Agency models and 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). It should

be noted that the definition of the 'Epsom & Ewell Critical Drainage Areas' is different from the 'Critical Drainage Areas' identified by the Environment Agency. 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.

The Council carried out a Regulation 18 draft Local Plan consultation in February/March 2023, which contained draft policy S15: Flood Risk and Sustainable Drainage. In accordance with national policy this: requires development to meet the sequential and exception test (where required); directs the most vulnerable development to the areas of lowest flood risk and; permits development that will be safe for its lifetime, without increasing the risk of flooding elsewhere. Developments are required, as a minimum, to ensure there is to be no net increase in surface water run-off. DtC partners were consulted on this document.

Following feedback from the Regulation 18 draft Local Plan consultation the Council commissioned a new SFRA to ensure it reflects the latest data, guidance and best practice. The relevant DtC partners have been involved in the production of the SFRA, which has now been published as part of the local plan's evidence base.

The issue of flood risk has been discussed in DtC meetings with neighbouring authorities. The DtC partners agree to share evidence and keep engaged on this issue.

The Regulation 19 Proposed Submission Local Plan Flood Risk and Sustainable Drainage policy (now S16) has been updated to reflect the latest evidence in the SFRA.

## **PARTNERS AND CONSIDERATIONS**

### **Adjoining authorities**

#### **Reigate & Banstead Borough Council (RBBC)**

RBBC have been engaged as part of the recent EEBC SFRA being invited to attend the inception meeting and comment on the level 1 draft SFRA.

RBBC's SFRA dates from 2017 and was jointly produced with Mole Valley DC and Elmbridge BC. RBBC intend to commission a new one as work has commenced on a new Local Plan. At a DtC meeting between EEBC and RBBC in May 2024 it was acknowledged that there were no significant cross boundary issues in relation to flooding identified to date. It was agreed to continue to share evidence with each other as it emerges.

#### **Royal Borough of Kingston upon Thames (RBK)**

RBK have been engaged as part of the recent EEBC SFRA, attending the inception meeting and providing comments on the level 1 draft SFRA.

No specific issues were raised as part of the Regulation 18 consultation. A DTC meeting held in May 2024 confirmed this position. As at May 2024, RBK were undertaking a new level 2 (sites) report. It was agreed to continue to share information to ensure any issues could be identified.

### **London Borough of Sutton (LBS)**

LBS have been engaged as part of the recent EEBC SFRA, attending the inception meeting and being invited to comment on the level 1 draft SFRA.

No specific issues were raised by LBS through the Regulation 18 draft Local Plan consultation.

DTC meetings were held with LBS in September 23 and October 24. Both authorities recognise that the greatest risk is from surface water flooding. LBS have produced a Level 1 SFRA with a Level 2 to follow.

### **Mole Valley District Council (MVDC)**

LBS have been engaged as part of the recent EEBC SFRA being invited to attend the inception meeting and comment on the level 1 draft SFRA.

### **Other authorities**

#### **Surrey County Council (SCC) as the Lead Local Flood Authority (LLFA)**

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.

Following the Regulation 18 draft Local Plan consultation the Council worked with SCC as the LLFA on commissioning and producing a new SFRA. The SFRA has also been raised in the flood risk partnership board meetings with SCC this year (comprising the same stakeholders). It has led to some discussion about a better joined up approach to undertaking SFRA's in the future, to ensure consistency across boroughs. Local Plan timelines make coordinating such projects difficult.

The SCC Flood Risk team were consulted on drafting the Regulation 19 Flood Risk policy.

## **Organisations with linkages to strategic issue**

### **Environment Agency (EA)**

The EA responded to the Regulation 18 draft Local Plan consultation and provided feedback on the draft plan. It was strongly recommended that maintenance and protection of any flood storage areas currently existing within the proposed areas of development are included into any considerations within the environmental constraints of a site.

Recommendations were made for amended/additional wording to policy S15. The main themes commented on were:

- Setback of development from the main rivers (should be 8m but for biodiversity reasons, ideally 10m)
- Finished floor levels of development should be set 300mm above the climate change flood level, which will maximise protection of potential occupants from all sources of flooding
- Flood storage compensation – policy should aim to increase or at least maintain the level of flood storage that is currently existing. As the Council's SFRA recognises that 'the available storage is not sufficient' the Council could potentially request a certain percentage increase in storage or percentage reduction in the built footprint, like the 10% BNG requirements
- Advise the use of more robust language such as 'unless in exception circumstances' and 'when justified by evidence' to replace phrases such as 'where possible' and 'if feasible'
- Functional floodplain – consider whether this should be included in the policy
- Culverting rivers – consider that this issue should be addressed in the policy

Following the Regulation 18 draft Local Plan consultation the Council has worked with the EA on commissioning and producing new SRFA. The EA has been consulted on a draft of the Regulation 19 Flood Risk policy.

### **Thames Water (TW)**

Thames Water responded to the Regulation 18 draft Local Plan consultation. A few of the draft site allocations were identified as potentially requiring upgrades of the water supply and wastewater network infrastructure. TW supported draft policy S15 in principle. It was recommended that the policy makes it clear that the policy relates to all forms of flooding including sewer flooding. In relation to the delivery of SUDS, TW consider the policy should require developments to aim for greenfield runoff rates (or as close as possible).

TW have been engaged as part of the recent EEBC SFRA, attending the inception meeting and being invited to comment on the level 1 draft SFRA. TW has also been consulted on the Council's Infrastructure Delivery Plan (IDP).

**SES Water (SESW)** specifically for groundwater flooding

SESW have been engaged as part of the recent EEBC SFRA and on the Council's Infrastructure Delivery Plan (IDP).

#### **Authorities/Organisations Engaged**

Surrey County Council (SCC)  
Reigate & Banstead Borough Council (RBBC)  
Royal Borough of Kingston upon Thames (RBK)  
London Borough of Sutton (LBS)  
Elmbridge Borough Council (EBC)  
Environment Agency (EA)  
Thames Water (TW)  
SES Water (SESW)

#### **Mechanism for Engagement**

Surrey Flood Risk Partnership Board

Contact directly and via the consultants preparing the SFRA

Engagement on sequential testing of site with the EA and SCC

Formal Local Plan consultations: Regulation 18 and 19

DtC meetings with relevant authorities/organisations.

### **STRATEGIC CROSS BOUNDARY MATTER**

#### **3.5 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.

##### **Current position**

Policy S19: Transport in the Regulation 19 Proposed Submission Local Plan addresses this issue. The Strategic Highways Modelling Assessment Report will be shared with neighbouring authorities and National Highways. The Council will continue to engage with Surrey County Council and

partners to identify appropriate mitigation to address the impacts of the development sites.

## **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.

To inform the Local Plan the Council commissioned SCC to provide a Regulation 18 Transport Assessment. This sought to consider the transport issues within the borough and identify which potential allocation sites minimise the need to travel by private car. The assessment has been used to inform the site selection process.

The Council carried out a Regulation 18 draft Local Plan consultation in February/March 2023. This contained numerous site allocations, which have implications for transport/movement, and a strategic draft transport policy S18. S18 seeks to ensure that new development helps to secure a sustainable transport network, which is safe, accessible and prioritises the needs of pedestrians and cyclists, meets parking standards (as defined in the plan) and promotes the establishment of car/cycle clubs and the uptake of electric/zero emission vehicles. DtC partners were consulted on this document.

To inform the Regulation 19 version of the Local Plan, the Council commissioned SCC to undertake a further Transport Assessment to assess the impact of development allocation options on the transport network. Where appropriate DtC partners have been involved in this assessment. The Strategic Highways Modelling Assessment Report has now been received and concludes that the highways impacts of the development sites tend to be local to the development sites themselves and the cumulative impact is, in general, tolerable. The next stage is for the Council to work with Surrey County Council and other partners to identify mitigation to address the impacts. This is most likely to focus on reducing the reliance on the private car rather than simply increasing capacity and will tie in with other strategies such as the Local Cycling and Walking Implementation Plan (LCWIP).

## **PARTNERS AND CONSIDERATIONS**

### **Organisations with linkages to strategic issue**

**Surrey County Council (SCC)**

The Council has worked with SCC on a Transport Assessment to identify the accessibility of potential sites to inform the Regulation 18 draft Local Plan. SCC were commissioned to undertake a further transport assessment to inform and support the Regulation 19 Local Plan.

SCC have produced their Local Transport Plan 4 (LTP4), which has been supported in principle by the Council. Transport policies in the local plan have been guided by LTP4 objectives. The Council will continue to 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. The Council and SCC have worked together to produce the Local Cycling and Walking Implementation Plan (LCWIP), which is a ten-year plan for investing in walking and cycling in the borough. Work has also commenced on design proposals for the Local Street Improvements Initiative. The Council's Infrastructure Delivery Plan, which identifies infrastructure schemes to support new development, is updated on an annual basis in consultation with SCC.

SCC responded to the Regulation 18 draft Local Plan consultation and provided both general, and policy specific comments. Some of the key areas of comment which relate to the DtC issue are outlined below.

With regards to policy S18, SCC are generally supportive of the policy and its alignment with LTP4. They are supportive of the ambition to provide car free development, where appropriate, and recognise that sites near to existing public and active travel infrastructure are most suitable for this.

General comments included ensuring active and sustainable travel is embedded across all town centre improvements/developments. This was discussed in more detail with SCC in November 2023. SCC advised that specific policy changes were not required but advised that the Council should continue to be mindful of the principles of LTP4. It was agreed that LTP4 should continue to be referenced as a supporting document in the Local Plan.

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 SCC 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. This issue was further discussed at a meeting in June 2024, where the Council advised it had undertaken a parking study which assessed the utilisation of the Epsom Town Centre car parks and will be used to inform the Local Plan. Providing an appropriate level of parking will require a balance to be struck.

To inform the Regulation 19 version of the Local Plan, the Council commissioned SCC to undertake a further Transport Assessment to assess the impact of development allocation options on the transport network. The

Strategic Highways Modelling Assessment Report has now been received and the Council will work with Surrey County Council and other partners to identify mitigation to address the impacts.

### **Transport for London (TFL)**

The Borough is adjacent to Greater London and there are significant transport linkages. For example, a number of TFL bus routes extend into the borough. The Council has and will remain engaged with TFL to identify where routes could be improved.

TFL responded to the Regulation 18 draft Local Plan consultation and suggested that some of the mayor's strategic transport policy objectives set out in the mayor's Transport Strategy and London Plan be extended to the borough, including rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger. It was also highlighted that proposals in the Local Plan will have an impact on road networks in adjoining London boroughs, particularly where growth is proposed close to the borough boundaries. Where there are cross boundary transport impacts, developer contributions may be required to provide improved public transport or active travel or increased capacity.

### **Adjoining authorities**

#### **Royal Borough of Kingston upon Thames (RBK)**

RBK responded to the Regulation 18 draft Local Plan consultation. Concerns were raised regarding a few of the potential site allocations which are within 'reasonable proximity' of the RBK borough boundary. These were scored under the Reg 18 Transport Assessment as having poor access to several 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.

A DTC meeting held in May 2024 provided the opportunity to further discuss this issue. RBK highlighted that the Hook junction is a key public transport corridor and is already significantly congested. In addition, a major phased residential development is underway in Tolworth and there are other potential development opportunities in this area. The EEBC Transport Assessment will help in understanding the potential impact on the road network. To feed into this, the council requested RBK's input to identify major development sites and/or transport schemes within RBK which could be taken into account as part of EEBC's Transport Assessment for the Regulation 19. The Transport Assessment will be shared with RBK.

### **London Borough of Sutton (LBS)**

DTC meetings were held with LBS in September 2023 and October 2024. To summarise:

- LBS have not yet commissioned a full transport assessment.
- TFL have paused the tram on affordability grounds, LBS intend to safeguard the route.
- Levelling up funding will be used to improve the frequency on the Belmont to Epsom line.
- The 470 bus will be replaced the S2 and the route extended to Epsom hospital. The majority of TFL vehicles serving Sutton are to be electric by 2024.
- LBS still committed to the delivery of the London Cancer Hub (LCH). Possibility of a new hospital on site. Likely to be tight parking restrictions, and employees will need to consider sustainable transport.
- Over supply of town centre car parks.

The council requested LBS's input to identify major development sites and/or transport schemes within LBS which could be taken into account as part of EEBC's Transport Assessment for the Regulation 19. The Transport Assessment will be shared with LBS.

### **Mole Valley District Council (MVDC)**

MVDC responded to the Regulation 18 draft Local Plan 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.

These issues were discussed at a DtC meeting held between the Council and MVDC in May 2024. In relation to Junction 9 of the M25, National Highways had a holding objection to MVDC's Local Plan, 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.

MVDC were informed as to the latest position with the Council's LCWIP. SCC have commenced work and while the project is currently at the high-level interventions stage, it 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.

The council requested LBS's input to identify major development sites and/or transport schemes within LBS which could be taken into account as part of EEBC's Transport Assessment for the Regulation 19. The Transport Assessment will be shared with MVDC.

### **Reigate & Banstead Borough Council (RBBC)**

RBBC did not raise any issues in relation to transport for the Regulation 18 draft Local Plan consultation. At a DtC meeting between RBBC and the Council in May 2024, no significant cross boundary issues were identified. It was agreed to share evidence as it emerges.

The council requested RBBC's input to identify major development sites and/or transport schemes within LBS which could be taken into account as part of EEBC's Transport Assessment for the Regulation 19. The Transport Assessment will be shared with RBBC.

### **Other authorities**

#### **Elmbridge Borough Council (EBC)**

EBC responded to the Regulation 18 consultation and gave their support to the emphasis on sustainable modes of transport. EBC stated they would be interested to see a Local Plan Transport Assessment in relation to any potential cross boundary impacts for Elmbridge at the A243, Rushett Lane and Fair Oak Lane junction. The Council will share the transport Assessment with EBC once received.

### **Authorities/Organisations Engaged**

Surrey County Council (SCC)  
Reigate & Banstead Borough Council (RBBC)  
Royal Borough of Kingston upon Thames (RBK)  
London Borough of Sutton (LBS)  
Elmbridge Borough Council (EBC)

### **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

DtC meetings with relevant authorities/organisations.

## **STRATEGIC CROSS BOUNDARY MATTER**

### **3.6 Meeting education needs, including Special Educational Needs and Disabilities (SEND).**

#### **Overview of issue**

New housing can generate additional demand for school places throughout the local plan period. The Council will work closely with Surrey County Council and adjoining local authorities to ensure future educational needs can be adequately met.

#### **Current Position**

Policy S17 within the Regulation 19 Proposed Submission Local Plan addresses infrastructure needs, while Policy DM21 specifically addresses education infrastructure. The school place forecasts which were based on the potential Regulation 19 Local Plan scenario indicate that there are likely to be sufficient school places at both primary and secondary level across the plan period. However, demand is not uniform, and the Council will continue to engage with Surrey County Council to ensure that needs are met.

#### **Background**

Surrey County Council has a statutory duty to ensure there are sufficient school places, including SEND provision 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 2024-2034. For the County, in the short term, the falling birth rate will mean the number of children requiring a primary school place is likely to have peaked in 201/2017. After that time any increases in demand will largely be because of inward migration and housing. For the secondary sector demand is offset by approximately eleven years from birth, which means that the pressures faced in the primary sector are now transitioning into secondary schools. As such, the secondary school population is projected to increase in most areas in the short term, before stabilising and declining in some areas from 2025 onwards. From this time, any demand pressures in secondary schools are likely to result from migration or additional housing. In terms of SEND provision, pupils within Surrey who require a specialist school place has more than doubled since 2015.

The proximity of some schools to the Borough's boundaries means that there is more cross border movement both inward and outward.

The Council carried out a Regulation 18 Local Plan consultation in February/March 2023, which contained draft policy DM14: Education Infrastructure. This policy is supportive of proposals which intensify and enhance established educational facilities in the borough and proposals

which maximise the extended or multiple use of educational facilities for the community/recreational use.

Surrey County Council have forecast the impact of the potential Regulation 19 Local Plan scenario, using their updated model. For primary provision, the forecasts identify that between 2025-2030 there is no change in the number of pupils until the last four years of the forecast planning period 2030-2034 there are estimated to be an additional 272 pupils in primary education. The beginning of the forecast period 2025-26 is the peak of demand with 6,901 pupils in school years reception to year 6. There are sufficient school places (7,196) and an estimated surplus of 295 places. After this year the demand decreases to a low of 6,263 pupils (2033-34) with a surplus of 933 places.

For secondary school based forecasts, a similar pattern is followed. The forecasts identify that between 2025-2030 there is no change in the number of pupils until the last four years of the forecast planning period 2030-2034 there are estimated to be an additional 50 pupils in primary education. The peak of demand is 2029-30 with 4,798 pupils in school years 7-11. There are sufficient school places (4,800) with an estimated surplus of 2 places. The lowest demand is for year 2033-34 with 4,644 pupils and a surplus of 156 places.

However, as demand for school places is not uniform the Council will continue to engage with Surrey County Council to determine if there are any niches of exceptional demand which require additional provision.

## **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)**

The Council regularly provides housing trajectory information to SCC to inform school place planning forecasts and will continue to work with SCC as the local plan is implemented and allocations are delivered.

SCC responded to the Regulation 18 consultation and provided an overview of the demand for education places in the borough which were based on forecasts prior to the Regulation 18 publication (this is due to forecasts being run on an annual basis using data provided by the Council – the data was provided in April 2022, prior to the Regulation 18 draft Local Plan consultation). This forecast showed that while demand for reception entry places is expected to reduce, there is currently very little capacity across primary schools in the borough. A long-term sufficiency gap for additional specialist places in Surrey has been identified. SCC stated that they will continue to liaise with the Council over this matter as the plan evolves and that CIL funds will be sought to help fund additional places.

At a meeting between the Council and SCC in November 2023, SCC stated that the Education Place Planning Forecasts for 2023/23, which would reflect the growth scenario set out in the Regulation 18 draft Local Plan were due to be published imminently.

In December 2023, SCC provided their Education Place Planning Forecasts for 2023/24. This found that overall demand for Year R (Reception year) places is expected to reduce in Epsom & Ewell. Demand for Year 7 places is expected to increase and is expected to fluctuate over the forecast period. In terms of the impact of planned housing in the borough, the forecasts show that with the additional yield, there would still be sufficient primary school places across the forecast period. However, there could be a small deficit of places in the planning area of South Epsom and Langley Vale in Year 3. Although surplus is expected in future years, primary schools across the borough of Epsom & Ewell are currently close to capacity so there is potential need for additional places in higher year groups of primary if additional housing resulted in more pupils applying for an in-year admission into schools in Epsom & Ewell.

The Year 7 forecasts show that with the additional pupil yield there is expected to be sufficient secondary school places in Epsom & Ewell. There may be additional places needed between 2026/27 to 2029/30 that SCC would expect to provide with bulge classes in existing schools.

In responding to EEBC's Interim Infrastructure Plan update (April 2024) SCC provided the following commentary: "As we are seeing lower numbers forecast for primary, any need predicted in the future would be for pupils with additional needs or post 16."

The Council requested forecasts based on the potential Regulation 19 Local Plan scenario using the updated model. The forecasts received indicate that there are likely to be sufficient school places across the plan period. However, demand is not uniform, and SCC/EEBC will continue to engage on this matter to ensure that needs are met.

### **Adjacent Local Authorities**

#### **Mole Valley District Council (MVDC)**

The Council 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. 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." During a DtC meeting held between the Council and MVDC in May 2024 it was agreed that the linkages and statements agreed in the 2021 SOCG remain relevant. The

Council will inform MVDC should any subsequent education forecasts identify any new issues.

### **Reigate & Banstead Borough Council (RBBC)**

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.

In response to consultation on the DTC framework (June 22), RBBC have stated that 'due to recent investment only very limited improvements in health and none in education facilities are currently being considered in Reigate & 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 & Ewell.'

At a DtC meeting between RBBC and the Council in May 2024, no significant cross boundary issues were identified. It was agreed to share evidence as it emerges.

### **Royal Borough of Kingston upon Thames (RBK)**

No specific issues have been identified for education. It was agreed at a DtC meeting in May 2024 to continue to share information and engage on this matter to enable any issues to be identified should they arise.

### **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 received permission on appeal, to be built at Rosehill Recreation Ground.

DTC meetings were held with LBS in September 2023 and October 2024. Since the adoption of the Local Plan, one new primary and one new secondary schools have been delivered. One SEND school is under construction at Sheen Way and there is potential for another specialist school at the Rosehill site (which has an unimplemented permission for a secondary school). Revised projections/reduced birth rates mean the pressure for additional schools is now lower. Both Council's highlighted the need for SEND provision.

### **Authorities/Organisations Engaged**

Surrey County Council (SCC)

Mole Valley District Council (MVDC)  
Reigate & Banstead Borough Council (RBBC)  
Royal Borough of Kingston upon Thames (RBK)  
London Borough of Sutton (LBS)

### **Mechanism for Engagement**

Engagement on the Infrastructure Delivery Plan.

Formal Local Plan consultations: Regulation 18 and 19.

DtC meetings with relevant authorities/organisations.

## **STRATEGIC CROSS BOUNDARY MATTER**

### **3.7 Meeting healthcare needs**

#### **Overview of issue**

New housing can generate additional demand for healthcare provision. The Council will work closely with the Surrey Heartlands Integrated Care Board (ICB) and adjoining local authorities to ensure healthcare needs can be adequately met.

#### **Current position**

Policies are included in Regulation 19 Proposed Submission Local Plan to address this issue. The Council will continue to engage with the ICB through the Infrastructure Delivery Plan to ensure healthcare needs are addressed.

#### **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 ICB (part of the ICS) is a statutory NHS organisation responsible for developing a plan for meeting the health needs of the population, managing the local NHS budget and arranging for the provision of health services in ICS area. 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.

The Council carried out a Regulation 18 draft Local Plan consultation in February/March 2023, which contained a policy on infrastructure provision. (S16: Infrastructure Delivery).

The Council has been conducting further engagement with the Surrey Heartlands ICB to identify the impact of the draft Local Plan (Reg 18) on healthcare infrastructure. This has been via the SidM model which has been developed for the NHS to assess the impact of potential new development on healthcare infrastructure.

The ICB have forecast the potential impact of the potential Regulation 19 Local Plan scenario. This has identified the anticipated financial impact of the spatial strategy on healthcare. The Council will continue to work with the ICB to identify schemes which can help address this impact.

The Council has liaised with both the ICB and Surrey County Council in developing the health-related policies in the Regulation 19 Proposed Submission Local Plan.

## **PARTNERS AND CONSIDERATIONS**

### **Surrey Heartlands Integrated Care Board (ICB)**

The Council has previously engaged with the ICB on early drafts of the Infrastructure Delivery Plan. This will continue as the local plan evolves. The ICB responded to the Regulation 18 consultation. Support was given to the overall approach to infrastructure delivery set out with draft Policy S16 and it was welcomed that the delivery of infrastructure could be supported through S106, S278 or other appropriate agreements, and the Community Infrastructure Levy (CIL). It was stated that large residential developments often have very significant impacts in terms of the need for additional healthcare provision for future residents, meaning that a planning obligation requiring that the development delivers a new healthcare facility is often necessary. Furthermore, the significant cumulative impacts of smaller residential developments and their need for mitigation should also be recognised. It was suggested that the policy should be clear that there will be an expectation for developers to engage with the council and infrastructure providers, to demonstrate they have explored existing infrastructure capacity, how this could be future proofed, and that they have made sufficient infrastructure provision. Development proposals which give rise to a need for infrastructure improvements will be expected to mitigate their impact, and planning permission will be granted subject to the provision of appropriate funding towards the level of infrastructure to support the development. Infrastructure providers should also have flexibility alongside the option of seeking financial contributions, to seek the provision of new on-site healthcare infrastructure and to secure free land and infrastructure/property to meet the relevant healthcare needs arising from developments.

Further engagement has taken place with the ICB in relation identifying the potential impact of new development on health infrastructure. The growth scenario contained in the Reg 18 draft Local Plan was tested via NHS Surrey Heartland's healthcare planning model. This identified that this would generate a potential requirement for circa 800sqm of additional

primary care floorspace to meet the needs of the incoming population. The Surrey Heartlands Integrated Care Board (ICB) identified three potential projects that which could be funded through CIL, which would help mitigate the impact of the developments coming forward. These would require feasibility testing.

The NHS Surrey Heartland's healthcare planning model has been used to assess the potential impact of the Regulation 19 local Plan scenario and the Council has met with the ICB to discuss these (September 2024). These discussions have helped inform the content of the policies within the Regulation 19 Proposed Submission Local Plan, for example the requirement for additional primary care capacity in relation to the site allocation SA35: Land at Horton Farm.

### **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.

SCC responded to the Regulation 18 consultation. Their 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. they also recommend a policy is included requiring developers to submit a HIA as part of the application process. The Council further discussed this response with SCC on 21/11/23 and it was suggested that the requirement could be targeted towards areas where there are health inequalities. The Council will consider when drafting the regulation 19 version of the Local Plan.

The Council has engaged with the County Council on health matters and over the past 12 months and has included a policy on Health Impact Assessments in the Regulation 19 Proposed Submission Local Plan.

### **NHS Property Services (NHSPS)**

NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations. NHSPS support NHS commissioners to deliver a local health and public estate that can be put to better use. This includes identifying opportunities to reconfigure the estate to meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites. NHSPS responded to the Regulation 18 consultation, particularly in relation to the draft infrastructure policy S16: Infrastructure Delivery and DM13: Community and Cultural Facilities and specific site allocations which involve healthcare estates. A request was made to amend the policy wording to support the principle that where the NHS can demonstrate a health facility will be changed as part of NHS estate reorganisation programmes, this will be sufficient for the local planning authority to accept that a facility is neither needed nor viable for its current use, and therefore that the principle of alternative uses for NHS land and property will be fully supported. The

Council will consider these comments when drafting the regulation 19 version of the Local Plan.

### **Adjacent Local Authorities**

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

#### **Mole Valley District Council (MVDC)**

The Council 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 ICB and the Surrey Downs Integrated Care Partnership. MVDC are allocating sites for enhanced healthcare provision in both Ashted and Leatherhead. At a DtC meeting held with MVDC in May 2024 it was agreed that the Council will inform MVDC should any new issues be identified by the ICB from future forecasts.

#### **Reigate & Banstead Borough Council (RBBC)**

#### **Royal Borough of Kingston upon Thames (RBK)**

No specific issues has been identified for healthcare. The authorities agreed (at a DtC meeting in May 2024) to continue to share information and engage on this matter to enable any issues to be identified should they arise.

#### **London Borough of Sutton (LBS)**

A DtC meeting was held between EEBC and LBS (October 2024) where healthcare was discussed. LBS currently have an existing small shortfall in provision and are anticipating future additional needs. Their Regulation 18 draft Local Plan has identified a number of potential sites which could help meet this need.

### **Authorities/Organisations Engaged**

Surrey County Council  
Mole Valley District Council  
Surrey Heartland ICB  
NHS Property Services

### **Mechanism for Engagement**

Engagement on the Infrastructure Delivery Plan and modelling

Formal Local Plan consultations: Regulation 18 and 19

DtC meetings with relevant authorities/organisations.

## **STRATEGIC CROSS BOUNDARY MATTER**

### **3.8 Meeting economic development needs: Addressing the impact of the potential redevelopment of industrial land.**

#### **Overview of issue**

Throughout the Local Plan process the Council has explored options to assist in meeting its housing need. One option was the potential redevelopment of the Kiln Lane and Longmead industrial estates, which could result in the displacement of employment uses. The potential impact of this option has been explored with partners to understand whether redevelopment for a housing led scheme is a realistic prospect.

#### **Current position**

Policy DM7: Employment Land in the Regulation 19 Proposed Submission Local Plan designates the Kiln Lane and Longmead industrial estates as strategic employment sites, which are afforded the highest protection and safeguarding for employment generating uses.

#### **Background**

The Borough has a significant need for new housing, although evidence shows that there are limited sites available for new development. The Council has therefore considered 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. These sites are the principal industrial sites in the borough and their redevelopment could result in the displacement of employment uses, which will impact on the wider economy.

The Council has gathered evidence on this issue identify whether the redevelopment of the industrial estates could be a reasonable option. This involved the following:

- A housing and Economic Needs Assessment (HEDNA) was commissioned to enhance understanding of the current provision and future needs for economic floorspace.
- A report was commissioned to examine the economic value of the industrial estates.
- As part of the Land Availability Assessment (LAA) the Council wrote to all landowners within the industrial estates, at least twice, to ascertain the potential availability of sites across the Local Plan period.
- The Sustainability Appraisal, published to support the Regulation 18 draft Local Plan, considered this potential option.

A brief summary of the findings of the evidence is set out below:

- The HEDNA (2023) found that within the borough demand for industrial/warehousing floorspace is strong, while vacancy rates are low with there only being a limited supply. It recommended that the Council should continue to secure this type of floorspace in key industrial estates of the borough.
- The economic value report found that the industrial estates hold significant economic value for both Epsom & Ewell and the wider regional economy. It stated that should redevelopment occur, without suitable alternative space provided in the borough, it is likely significant business displacement would occur, which would most likely be outside of Epsom & Ewell due to a lack of similar facilities within the borough.

The availability of land for redevelopment across the Local Plan period assessed through the LAA, found that only three sites were available within the industrial estates.

As a result of this evidence and supported by the sustainability appraisal, the Council chose not to take this option forward as part of the Regulation 18 draft Local Plan.

## **PARTNERS AND CONSIDERATIONS**

Partners include adjoining local authorities, Surrey County Council, and the Coast to Capital Local Enterprise Partnership (LEP). The LEP were directly involved through being commissioned to undertake an Economic Value Report of the industrial estates.

## 4 Collaboration on Evidence Base

There is a variety of evidence which informs the development of the local plan. Some of the key pieces of evidence involve collaboration/joint working with partners and other authorities. A summary of where engagement has taken place is outlined below.

### Land Availability Assessment (LAA)

Consultation on LAA methodology (May 2022)	
Consulted with	Adjacent authorities, wider Surrey authorities, Surrey County Council, The Greater London Authority, Natural England, Environment Agency, Historic England and Homes England
Purpose of consultation	Seeking feedback on proposed LAA methodology
Outcome	No changes were required. LAA published 2022 and updated 2024.

### Housing and Economic Development Needs Assessment (HEDNA)

Survey (May to August 2022), workshops (October 2022 and November 2022) and an online workshop (to be held February 23)	
Consulted with	Planning Agents, housebuilders/developers, Neighbouring LPAs, various key business stakeholders (for example The Jockey Club and commercial property developers) and other stakeholders (for example The University for the Creative Arts, to ascertain their need for student accommodation and plans for growth, and The Surrey Minority Ethnic Forum). The Adult Social Care team from Surrey County Council were further consulted, following the workshop, on their approach/methodology to housing with care.
Purpose of consultation	Survey was to gain initial insights from stakeholders close to the start of the project Workshops were to provide the opportunity for stakeholders to respond to the emerging study. Follow up consultations where required.
Outcome	Information from the consultees helped inform the project. HEDNA published 2023.

### Gypsy and Traveller Accommodation Assessment (GTAA)

Consultation via consultants to inform the GTAA (Autumn 2021)	
Consulted with	Adjacent authorities, Surrey County Council
Purpose of consultation	To ensure wider issues such as in-migration, travelling patterns and unauthorised encampments are understood.
Outcome	Background information to inform the GTAA provided. GTAA published 2022.

### **Sustainability Appraisal (SA) Scoping Report**

Consultation on Scoping Report (May to June 2022)	
Consulted with	Adjacent authorities, wider Surrey authorities, Surrey County Council, Natural England, Environment Agency, Historic England and Coast to Capital (LEP)
Purpose of consultation	To establish the scope for the SA work on the draft Local Plan and a baseline of information against which to assess the likely effects of reasonable alternatives using the SA framework
Outcome	A revised SA Scoping Report

### **Strategic Flood Risk Assessment (SFRA)**

Engagement throughout the production of the SFRA (January to June 2024)	
Consulted with	Surrey County Council (as Lead flood risk authority) Environment Agency Neighbouring local authorities
Purpose of consultation	To ensure the specification of the SFRA reflects best practice, most recent guidance and data. To ensure partners remain informed and engaged in the findings of the SFRA.
Outcome	A specification document for the SFRA A Level 1 SFRA A Level 2 SFRA

## 4 Engagement with DtC Bodies

The following section sets out a brief summary of the engagement the Council has undertaken with the prescribed DtC bodies, whom are not directly involved with the strategic matters/issues identified in section 3.

### 4.1 Historic England (HE)

HE responded to the Regulation 18 consultation. A summary of the comments received is set out below:

The vision and objectives with their references to the heritage and its conservation was welcomed. It was considered that the draft Plan appeared to be supported by limited evidence for the historic environment. No specific heritage documents are listed on the Local Plan evidence pages and only the National Heritage List for England, Locally Listed Heritage Assets, and Conservation Area Appraisals are listed as key supporting documents to the policies. Concern was raised that the selection of sites had not been appropriately informed by a robust understanding of the historic environment. It was suggested for several of the Site Allocations that Heritage Impact Assessments be required as an integral part of the policies. The inclusion of strategic policy 13 and policy S2: protecting the Historic Environment was welcomed, with a suggestion being made that reference is made to Historic England advice 'Statements of Heritage Significance: Analysing Significance in Heritage Assets'. Policy DM8: Heritage Assets was supported in principle, although it was suggested that the text should be reviewed to ensure full compliance with the NPPF.

Council officers have engaged with HE to discuss their comments and have sought feedback on the draft Regulation 19 policies related to the historic environment. This also involved sharing heritage appendices and Heritage Impact Assessments for the potential site allocations. Additionally, the Council has produced a Heritage Topic Paper, which has been shared with HE (September 2024). HE responded positively overall, suggesting that such material would satisfy the requirements of paragraph 31 and 198 of the NPPF.

HE will be consulted at the Regulation 19 stage.

### 4.2 Natural England (NE)

NE responded to the Regulation 18 consultation. General comments were made on a few of the potential site allocations and on a number of the policies. Topics commented on included:

- Landscape

- Trees
- Flood risk
- Air pollution
- Green Infrastructure
- Biodiversity opportunity areas & nature recovery networks
- Biodiversity net gain & Geodiversity
- Natural capital
- Climate change and energy efficiency

NE also responded to a targeted consultation on the Initial Screening Report for the regulation 18 Habitats Regulation Assessment (HRA). As part of the HRA, numerous advice notes produced by NE have been taken into account along with NE's standard methodology for the assessment of traffic related air quality impact.

In July 2024 the Council wrote to NE to enquire they would like to have prior sight of the draft policies relevant to NE prior to the Regulation 19 and whether a SOCG is needed. NE responded (August 2024) welcoming the opportunity to review the draft policies but stated that due to staffing shortages they may not be able to respond. Also confirmed that "given the lack of serious outstanding issues with the Reg 18, there is no need for a SoCG ." NE intend to comment on the Regulation 19 submission version.

Draft Regulation 19 policies relating to the Natural Environment were sent to NE for review in October 2024, with the understanding that a response may not be received due to limited resources.

NE will be consulted at the Regulation 19 stage.

### 4.3 The Civil Aviation Authority (CAA)

A response to the Regulation 18 consultation was received from Gatwick Airport Limited (GAL). This confirmed that currently the Borough of Epsom & Ewell is outside the safeguarding zone for development, which is 15km from the Aerodrome Reference Point (APR). It was 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. It was therefore recommended that the Local Plan includes an Aerodrome Safeguarding policy.

In July 2024 the Council contacted GAL to confirm the status of the safeguarding zone and to enquire whether GAL's response would assist in meeting the DtC requirement in terms of safeguarding in the absence of any response from the CAA. A reply was received (July 2024) stating that it was anticipated that the extended consultation area will be ready around the end of July/early August, which was later than originally anticipated. It was also stated that the CAA had devolved the responsibility for aerodrome

safeguarding to individual airports and as such, the DtC will be met through consulting the relevant airports.

In August 2024 the Council was contacted by Heathrow to advise that they have revised their safeguarding map. The current safeguarding zone extends out to 15km from the airport but it will be extended to 55km to comply with the revised CAA regulatory requirements in relation to (IFPs). This new map will be in effect by April 2025. The Council will be required to consult with Heathrow on developments exceeding a certain height threshold, which varies across the borough.

In anticipation of these changes the Council has included a new Aerodrome Safeguarding policy in the Regulation 19 Proposed Submission Local Plan.

GAL and Heathrow will be consulted at the Regulation 19 stage if no issues are raised beforehand.

#### **4.4 Homes England (HE)**

The Council did not receive a response from HE to the Regulation 18 consultation. HE has been contacted subsequently (July 2024) to provide a further opportunity for any issues to be raised or comments made on the draft Local Plan.

The Council has not had any direct involvement with HE in the recent past and they have no active land interests in the borough.

HE will be consulted at the Regulation 19 stage if no issues are raised beforehand.

#### **4.5 Office of Road and Rail (ORR)**

The Council did not receive a response from the ORR.

The ORR was contacted offering a further opportunity to raise any issues or comment on the draft Local Plan (July 2024) in line with the DtC guidance available on their website.

ORR to be consulted at the Regulation 19 stage if no issues are raised beforehand.

#### **4.6 National Highways (NH)**

The Council received a response from NH to the Regulation 18 consultation. This highlighted that the closest junction of the strategic road network (SRN) to the borough is the M25 J9. Not part of the SRN is within the borough. NH require a robust evidence base 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.

The Council contacted NH to advise of the undertaking of a Transport Assessment to support the Regulation 19 stage, Proposed Submission Local Plan. The Council will send this through to NH prior to the Regulation 19 formal consultation stage to help identify and potentially resolve any issues.

Next steps: Send NH the Transport Assessment once complete.

NH will be consulted at the Regulation 19 stage.

#### **4.7 Coast to Capital Local Enterprise Partnership (C2C)**

Planning Practice Guidance states that “Local Enterprise Partnerships are not subject to the requirements of the duty [to cooperate], but local planning authorities and county councils in England, and prescribed public bodies must cooperate with them. Local planning authorities must have regard to their activities when they are preparing their local plans, so long as those activities are relevant to plan-making.”

The Council have engaged with C2C throughout the Local Plan process and commissioned the organisation to examine the economic value of two key industrial estates within the borough. This evidence informed the plan making process.

From April 2024 Surrey County Council formally absorbed the economic growth and business representation functions previously held by the Coast to Capital LEP. The Council engages regularly with Surrey County Council.

SCC will be consulted at the Regulation 19 stage.

#### **4.8 Surrey Nature Partnership (SNP)**

The SNP champion the value of the natural environment in decision making at all levels. Their key area of work is in relation to nature recovery, in particular biodiversity net gain, biodiversity opportunity areas, Local Nature Recovery Strategies, and a natural capital approach.

Biodiversity Net Gain (BNG): SNP along with the Surrey Wildlife Trust are recommending a 20% biodiversity net gain requirement for relevant new development, rather than the national minimum of 10%.

Biodiversity Opportunity Areas (BOAs): These are identified areas of the Surrey landscape where a 'landscape scale approach' can assist wildlife sites to become bigger, better managed and more effectively connected.

Local Nature Recovery Strategy (LNRS): this strategy, required by the Environment Act 2021, is being produced by Surrey County Council with the SNP being part of the steering group. SCC aim to have the strategy completed by the end of 2024. There are strong links between the LNRS, BOAs and BNG.

The Council did not receive a response from the SNP but did receive a response from the Surrey Wildlife Trust with whom the SNP works closely.

The Council will continue to engage with both the SNP and Surrey Wildlife Trust.

The Council has considered the inclusion of a 20% BNG requirement and is seeking to include this for a number of the site allocations within the Regulation 19 Proposed Submission Local Plan, where a higher requirement is likely to be deliverable.

SNP will be consulted at the Regulation 19 stage.

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

<b>LPA</b>	<b>Status of Local Plan</b>	<b>Current adopted housing target (dpa)</b>	<b>Standard Method Housing Need (dpa)</b>	<b>Level of unmet need against standard method</b>
Epsom & Ewell Borough Council	Regulation 19 consultation due early 2025	181 Core Strategy (2007)	569	Regulation 19 Proposed Submission Local Plan sets a housing requirement of 4,700 dwellings over the plan period. This results in an unmet need of approximately 5,500 dwellings.
Mole Valley District Council	Local Plan adopted October 2024.	336 Local Plan (2024)	456	Local Plan has a housing target of delivering 336 dpa over the plan period. As this is below the standard method figure of 456 dpa, a review of the Local Plan will be undertaken within three years of adoption.
Reigate & Banstead Borough Council	Work commenced on a new Local Plan in early 2023.	460 Core Strategy (2014) reviewed 2019	1,123	Unknown, although anticipating limited availability of sites.
London Borough of Sutton	Regulation 18 consultation held July to	469	886	Unknown, although anticipating limited availability of sites.

	September 2024.	London Plan (2021)		
Royal Borough of Kingston Upon Thames	Regulation 18 consultation held November 2022 to February 2023.	964 London Plan (2021)	1,822	Regulation 18 commits to deliver 9,640 homes between 2019/20 and 2028/29 (964 dpa).
Elmbridge Borough Council	Local Plan at examination. Inspector has written to EBC to advise them to either withdraw the plan or a report will be issued declaring it unsound (October 2024).	225 Core Strategy (2011)	647	Withdrawn/unsound Local Plan sought to deliver 6,785 over the 15-year plan period (452 dpa) Shortfall: 2,925 dwellings.
Guildford Borough Council	Local Plan: Strategy and sites adopted 2019. Agreed in February 2024 to update the Local Plan.	562	787	Unknown if any unmet needs at this time.
Runnymede Borough Council	Local Plan adopted 2020.	500	549	Review of Local Plan to commence in January 2025. Unknown if any unmet needs at this time.
Spelthorne Borough Council	Submitted for examination Nov 2022. Examination	166 Core Strategy (2009)	618	Submitted plan seeks deliver 9,270 over the 15-year plan period (618 dpa) Shortfall: None.

	currently paused.			
Tandridge District Council	Local Plan withdrawn from examination (April 2024). Work to commence on a new Local Plan July 2024.	125 Core Strategy (2008)	644	Withdrawn plan sought to provide 303 dpa. Over 50% unmet need compared to standard method.
Waverley Borough Council	Local Plan adopted 2018. Work on a new Local Plan commenced in November 2023.	590	713	Adopted plan met identified needs at the time and 50% of Woking's unmet needs (83 dpa).
Woking Borough Council	Work on a new Local Plan likely to commence in late 2024.	292 Core Strategy (2012)	429	Unknown

## Appendix 2:

Request for assistance in meeting housing and Gypsy & Traveller needs  
(November 2022)

- 1) List of authorities contacted.
- 2) Copy of the letter which outlined the request.
- 3) Summary of responses received.

- 1) List of authorities contacted

Reason	Authorities
Authorities in the Housing Market Area (as defined in the 2016 Strategic Housing Market Assessment)	<ul style="list-style-type: none"><li>• Elmbridge BC</li><li>• RB Kingston Upon Thames</li><li>• Mole Valley DC</li></ul>
Adjoining authorities	<ul style="list-style-type: none"><li>• LB of Sutton</li><li>• Reigate &amp; Banstead BC</li></ul>
Other Surrey boroughs and districts	<ul style="list-style-type: none"><li>• Guildford BC</li><li>• Runnymede BC</li><li>• Spelthorne BC</li><li>• Surrey Heath BC</li><li>• Tandridge DC</li><li>• Waverley BC</li><li>• Woking BC</li></ul>
Authorities beyond the London Metropolitan Green Belt	<ul style="list-style-type: none"><li>• Slough BC</li><li>• RB Winsor &amp; Maidenhead</li><li>• Bracknell Forest Council</li><li>• Wokingham DC</li><li>• Hart DC</li><li>• Rushmoor DC</li><li>• East Hampshire DC</li><li>• Chichester DC</li><li>• Horsham DC</li><li>• Mid Sussex DC</li><li>• Crawley BC</li><li>• Sevenoaks DC</li></ul>
Strategic authority for London	<ul style="list-style-type: none"><li>• The Greater London Authority</li></ul>

- 2) Copy of the letter which outlined the request

Town Hall  
The Parade  
Epsom  
Surrey  
KT18 5BY

Main Number (01372) 732000  
Text 07950 080202  
[www.epsom-ewell.gov.uk](http://www.epsom-ewell.gov.uk)  
DX 30713 Epsom

Date 18 November 2022

Contact  
Direct line

Email [localplan@epsom-ewell.gov.uk](mailto:localplan@epsom-ewell.gov.uk)

Dear Neighbours.

### **Duty to Cooperate: Housing Land Supply**

Epsom and Ewell Borough Council is finalising its Land Availability Assessment (LAA) that will inform its new Local Plan. We contacted some of you earlier this year with our draft methodology and invited you to make comments. Thank you for the comments received.

We have now carried out the assessment and the figures are indicating that we will be unable to meet the identified housing need as calculated by the standard method. The Borough's identified need is calculated to be 576 per annum, this projected for our new plan period 2022 to 2040 is 10,368 dwellings. Taking into account the outstanding housing permissions and the potential supply in the urban area identified in the LAA, the Borough is only capable of accommodating 3849 dwellings or 37% of the calculated need.

It is important that we point out that we undertook the assessments with optimal densities in mind whilst also taking into account the character of the area. Further to this we undertook some high level calculations to test higher densities. Whilst higher densities will result in more of the need being met, this only goes so far in addressing the significant shortfall (at most a few percentage points) and by doing so has implications to the character of the identified urban areas.

In light these figures and in accordance with national policy and the duty to cooperate; we are writing to our neighbours to understand whether you are able to meet some or all of EEBC's residual identified need within your area/borough? This is in the region of 6,500 dwellings up to 2040.

We would also like to take the opportunity to bring to attention to our recently published [Gypsy and Traveller Accommodation Assessment 2022](#). This identifies a need for 10 Gypsy and Traveller pitches by 2040. We are currently exploring opportunities to meet the identified needs within the borough but may have a shortfall here also and therefore would like to understand whether you are able to meet some or all of EEBC's identified need within your area/borough?

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 so that we can consider our Spatial Strategy options in light of the responses we receive.

Yours Sincerely

Head of Place Development

3) Summary of the responses received (November 2022)

Authority	Able to assist?	Response
Bracknell Forest Council	No	<ul style="list-style-type: none"> <li>No spare capacity.</li> <li>Plan submitted for examination, which include release of Green Belt.</li> </ul>
Elmbridge BC	No	<ul style="list-style-type: none"> <li>Unable to meet their own needs in full.</li> </ul>
Guildford BC	No	<ul style="list-style-type: none"> <li>Unable to meet additional needs.</li> <li>Consider there to be no functional links between the authorities.</li> <li>Suggest EEBC considers Green Belt release as Guildford have met their own needs in full through the inclusion of Green Belt sites.</li> </ul>
Hart DC	No	<ul style="list-style-type: none"> <li>Hart is a considerable distance from Epsom &amp; Ewell.</li> </ul>
Horsham DC	No	<ul style="list-style-type: none"> <li>Unable to assist.</li> <li>Significant issues with water neutrality which is affecting housing delivery.</li> <li>Advise consideration of Green Belt release.</li> </ul>
Mid Sussex DC	No	<ul style="list-style-type: none"> <li>Mid Sussex draft plan is seeking to meet its own need and also some of Crawley's.</li> <li>Assisting neighbouring authorities will be prioritised.</li> </ul>
Mole Valley DC	No	<ul style="list-style-type: none"> <li>As per the reasons in the signed SOCG.</li> <li>Suggest EEBC reviews the capacity of the urban area and considers Green Belt release.</li> </ul>
Rushmoor DC	No	<ul style="list-style-type: none"> <li>Challenging to meet own needs.</li> <li>Heavily constrained by Special Protection Areas (SPAs)</li> </ul>
Spelthorne BC	No	<ul style="list-style-type: none"> <li>No spare capacity – Submitted Local Plan meets need through increasing urban densities and release of underperforming Green Belt land.</li> <li>Advise EEBC to consider including Green Belt to meet needs.</li> <li>Consider only weak linkages with EEBC.</li> </ul>
Surrey Heath BC	No	<ul style="list-style-type: none"> <li>Unable to assist.</li> </ul>

		<ul style="list-style-type: none"> <li>Hart DC have agreed to meet some of Surrey Heath's needs.</li> </ul>
Waverley BC	No	<ul style="list-style-type: none"> <li>Unable to assist.</li> <li>Meeting their own needs and some of Woking's.</li> </ul>

### Appendix 3:

Request for assistance in meeting housing and Gypsy & Traveller needs (July 2024)

- 1) List of authorities contacted.
- 2) Copy of the letter which outlined the request.
- 3) Summary of responses received.

- 1) List of authorities contacted

Reason	Authorities
Authorities in the Housing Market Area (as defined in the 2016 Strategic Housing Market Assessment)	<ul style="list-style-type: none"><li>• Elmbridge BC</li><li>• RB Kingston Upon Thames</li><li>• Mole Valley DC</li></ul>
Adjoining authorities	<ul style="list-style-type: none"><li>• LB of Sutton</li><li>• Reigate &amp; Banstead BC</li></ul>
Other Surrey boroughs and districts	<ul style="list-style-type: none"><li>• Guildford BC</li><li>• Runnymede BC</li><li>• Spelthorne BC</li><li>• Surrey Heath BC</li><li>• Tandridge DC</li><li>• Waverley BC</li><li>• Woking BC</li></ul>
Authorities beyond the London Metropolitan Green Belt	<ul style="list-style-type: none"><li>• Slough BC</li><li>• RB Winsor &amp; Maidenhead</li><li>• Bracknell Forest Council</li><li>• Wokingham DC</li><li>• Hart DC</li><li>• Rushmoor DC</li><li>• East Hampshire DC</li><li>• Chichester DC</li><li>• Horsham DC</li><li>• Mid Sussex DC</li><li>• Crawley BC</li><li>• Sevenoaks DC</li></ul>
Strategic authority for London	<ul style="list-style-type: none"><li>• The Greater London Authority</li></ul>

2) Copy of the letter which outlined the request

Town Hall  
The Parade  
Epsom  
Surrey  
KT18 5BY

Main Number (01372) 732000  
Text 07950 080202  
[www.epsom-ewell.gov.uk](http://www.epsom-ewell.gov.uk)  
DX 30713 Epsom

Date 10 July 2024

Contact  
Direct line

Email [localplan@epsom-ewell.gov.uk](mailto:localplan@epsom-ewell.gov.uk)

Dear XXX

### **Duty to Cooperate: Housing Land Supply**

Epsom and Ewell Borough Council is progressing with its Local Plan and is now moving towards the Regulation 19 stage in the plan making process. To support this, we have been carrying out further work on our evidence base to ensure it is robust and up to date, to help guide and inform the content of the Regulation 19 version of the Local Plan. Part of this work has involved reviewing and updating the Land Availability Assessment (LAA), which is now mostly complete.

We previously contacted you in November 2022 when the first iteration of the [LAA](#) was almost complete, to ask for assistance in meeting some of our housing needs. The government's standard method has identified our housing need be 573 new dwellings per annum, which is 10,314 dwellings across the plan period 2022 to 2040. This represents a significant increase in housing delivery given that our previous Core Strategy housing target was for 181 new dwellings per annum.

The borough of Epsom & Ewell comprises either urban areas or Green Belt land and the LAA had shown the availability of sites to be extremely limited, with the urban areas being only able to accommodate 37% of the housing need generated by the standard method. In accordance with the planning practice guidance, where insufficient sites / broad locations to meet need are identified, we have revisited and updated the LAA. This has involved:

- Another Call for Sites exercise.
- Contacting all landowners again to confirm availability of sites.
- Reviewing 2022 LAA sites against any updated evidence (for example any changes to the Environment Agency's flood zones).

- Reviewing estimated capacities of individual sites (seeking to optimise yields).
- Reviewing current planning applications/refusals/pre-applications.
- Updating the windfall allowance based on past trends – to include an allowance for small (1-4) and medium (5-19) windfalls.
- Updating the trajectory.

The LAA update has shown that potential supply in the urban area of the Borough has reduced slightly, with the identified urban sites being capable of accommodating 33% of the calculated need generated by the standard method. This reduction is primarily due to sites not being confirmed as available by the landowners.

It should be noted that Green Belt sites, which have been promoted through the various Call for Sites exercises, have been included in the LAA to ensure comprehensiveness and completeness. However, they have not been included in the housing supply calculations as this requires the demonstration of exceptional circumstances. To demonstrate the severity of the borough's housing supply position, the table below shows what the situation would be if all the Green Belt sites submitted to the Council were to be included, regardless of their suitability or the need to demonstrate exceptional circumstances. It is clear there would still be a significant shortfall in the housing land supply against the need generated by the standard method.

Type of Site	% of housing need as per the standard method	Unmet need against the standard method
Urban sites (assessed as being deliverable and developable)	33%	6,910 (67%)
Green Belt sites (all sites promoted through the Call for Sites exercise)	45%	-
<b>Total</b>	<b>78%</b>	<b>2,269 (22%)</b>

As such, in accordance with current national policy and the duty to cooperate, we are once again writing to our neighbouring authorities, wider Surrey authorities, those within the same housing market area and those who may not be constrained by Green Belt designations to seek assistance in meeting our unmet need. We are keen to understand whether anything has changed with your own housing land supply position since we last wrote to you in November 2022, which would enable you to assist us?

In addition to housing need, we are also in a challenging position in relation to meeting our Gypsy and Traveller accommodation needs. Since the government's change in definition of a Gypsy or Traveller, our need has risen from 10 additional pitches to 18 additional pitches<sup>5</sup>. We are exploring

<sup>5</sup> Needs are identified in our [Gypsy and Traveller Accommodation Assessment 2022](#).

opportunities as to how these needs could be met but are anticipating there being a shortfall. Again, we wrote to you previously regarding this issue and are keen to understand if your own situation has changed and you are able to offer any assistance in helping to meet this need?

If you wish to discuss the content of this request and/or require further details, please let me know and we can arrange a meeting or phone call.

We would be grateful for a response by **Friday 9 August 2024** so that we can consider our Spatial Strategy options in light of the responses we receive.

Yours Sincerely

Head of Place Development

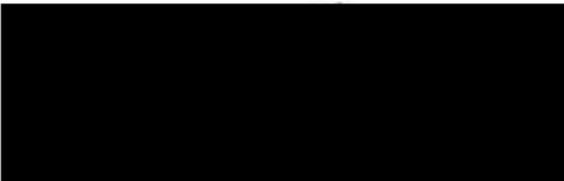
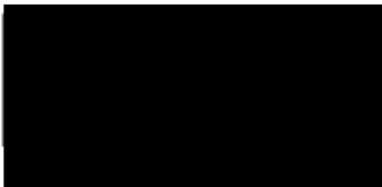
3) Summary of the responses received (July 2024)

Authority	Able to assist?	Response
East Hampshire BC	No	<ul style="list-style-type: none"> <li>Have been asked to assist in meeting the needs of geographically closer authorities.</li> <li>There is a limit as to the amount of housing which can be accommodated within East Hants.</li> </ul>
Guildford BC	No	<ul style="list-style-type: none"> <li>Unable to meet additional needs.</li> <li>Are able to meet their own needs but facing some challenges with the delivery of strategic sites.</li> <li>Meeting their own Gypsy &amp; Traveller needs but again challenges with strategic sites is having an impact on delivering additional sites.</li> </ul>
RB Kingston	No	<ul style="list-style-type: none"> <li>RBK has significant protected areas.</li> <li>Finding it challenging to meet their own housing and Gypsy &amp; Traveller accommodation needs.</li> </ul>
Mole Valley DC	No	<ul style="list-style-type: none"> <li>Local Plan is nearing end of examination. Only meeting 75% of need.</li> <li>Have a high need for Gypsy and Traveller sites which is being met through strategic site allocations, intensification of existing sites and windfall. No additional capacity.</li> </ul>
Reigate & Banstead BC	No	<ul style="list-style-type: none"> <li>Have commenced work on a new Local Plan and will be producing a new LAA.</li> <li>Based on existing delivery rates, the standard method, the brownfield land register and other sources of evidence, it is highly unlikely there will be capacity to assist.</li> <li>Same situation for Gypsy &amp; Traveller needs.</li> </ul>
Runnymede BC	No	<ul style="list-style-type: none"> <li>Adopted a Local Plan in 2020, which only plans to meet the housing needs of Runnymede.</li> <li>Finding sufficient suitable and deliverable sites was a challenge.</li> </ul>

		<ul style="list-style-type: none"> <li>Finding it difficult to meet their own significant Gypsy &amp; Traveller needs.</li> </ul>
Rushmoor DC	No	<ul style="list-style-type: none"> <li>Challenging to meet own needs.</li> <li>Little local demand for Gypsy &amp; Traveller sites</li> <li>Heavily constrained by Special Protection Areas (SPAs)</li> </ul>
Tandridge DC	No	<ul style="list-style-type: none"> <li>Have recently withdrawn Local Plan from examination due to soundness issues.</li> <li>Many constraints in the borough which means a number less than the need generated through the standard method is likely to be delivered.</li> <li>A Gypsy &amp; Traveller Accommodation Assessment is currently underway &amp; TDC will inform EEBC of the outcome of this.</li> </ul>
Waverley BC	No	<ul style="list-style-type: none"> <li>Unable to assist.</li> <li>Undertaking a new GTAA</li> <li>Meeting their own needs and some of Woking's.</li> <li>Unclear what changes the new government will make to the standard method.</li> </ul>

## Appendix 4:

Statement of Common Ground between Mole Valley District Council and Epsom & Ewell Borough Council as part of the Mole Valley Local Plan process. Date of SOCG: June/July 2021

<b>1. List of Parties involved:</b>
<ul style="list-style-type: none"><li>• Epsom &amp; Ewell Borough Council (EEBC)</li><li>• Mole Valley District Council (MVDC)</li></ul>
<b>2. Signatories:</b>
<div></div> <p>28.07.21</p> <p><i>Epsom &amp; Ewell Borough Council</i> <i>Councillor David Reeve, Chair of Licensing and Planning Policy Committee</i></p> <div></div> <p>14.06.21</p> <p><i>Mole Valley District Council</i> <i>Councillor Margaret Cooksey, Cabinet Member for Planning</i></p>
<b>3. Strategic Geography</b>
<p>The Statement of Common Ground (SOCG) is between the local authorities of Epsom &amp; Ewell Borough Council (EBBC) and Mole Valley District Council (MVDC)</p> <p>EBBC and MVDC share a common boundary within the Surrey County Council administrative area. The authorities have considerable economic and planning and physical linkages. Both authorities are in the Kingston and North East Surrey Housing Market Area and are similarly influenced by London in terms of the economy and overspill. In terms of planning, both authorities have extensive areas designated as Green Belt and both have areas of common land and heritage assets which constrain development. With regard to physical linkages, both authorities share Junction 9 of the M25 as their motorway access point, have the A24 as their spine roads, and share a principal railway line to London. There are cross-boundary natural environments as well as cross-boundary health and education functions. There is also significant out-migration from Epsom &amp; Ewell borough to Mole Valley district.</p>

Since the two local authorities are within the same Strategic Housing Market Area and share so many linkages and commonalities, it is beneficial to prepare a SOCG to deal with the strategic and locally specific cross-boundary issues identified.

Both authorities lie in separate Functional Economic Market Areas (FEMAs). However, both authorities are located within the Coast to Capital Local Enterprise Partnership (LEP) Area and are partners of the Gatwick Diamond Initiative. They also share a strategic objective in the Surrey County Council Place Ambition document for improved connectivity in the Epsom and Leatherhead area.

The map below shows the authorities in relation to each other (with the black lines indicating administrative boundaries).



#### 4. Strategic Matters

Both parties have identified the following as strategic matters of importance and agreements on positions are set out below:

##### **Housing Need**

###### **Background**

EEBC has yet to complete its housing capacity work but its local housing need is currently 577 new homes per year. MVDC has a local housing need figure of 456 new homes per year and has strived to meet its housing need figure in its Local Plan by (i) allocating town centre sites for housing-led redevelopment; (ii) adopting a policy of gentle densification on brownfield

sites; (iii) allocating outmoded office complexes for housing-led regeneration; (iv) de-designating Green Belt for housing; (v) allocating Green Belt sites in and around Hookwood for housing; and, (vi) amending village boundaries for housing development. MVDC has a local unmet need of c1,700 dwellings over its plan period 2020-2037.

The parties agree:

1. Due to constraints including the statutory Green Belt, and other primary constraints EEBC may not be able to meet its own housing need figure, let alone another authority's target.
2. Due to the fact that 76% of the district is designated as Green Belt and 45% is designated as an Area of Outstanding Natural Beauty or Area of Great Landscape Value and both its principal towns are Conservation Areas, MVDC is unable to meet its own local housing need in full and so cannot meet any unmet housing need which may arise from Epsom & Ewell borough.
3. Both authorities will seek to meet their own need for additional Gypsy and Traveller pitch provision.

### **Education**

#### **Background**

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.

The parties agree:

4. Planning for education will require discussions across the two local authority areas with the involvement of Surrey County Council's Pupil Place Unit but 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.

### **Health**

#### **Background**

There are significant linkages between both authorities with St Stephen's Practice having GP surgeries in both areas, Epsom residents using Leatherhead Community Hospital and Mole Valley residents using Epsom General Hospital.

The parties agree:

5. Planning for health provision will require discussions across the two authority areas, involving the Clinical Commissioning Groups and Surrey Downs Integrated Care Partnership and MVDC is allocating sites for enhanced healthcare provision in both Ashted and Leatherhead.

### **Transport**

#### **Background**

Junction 9 of the M25 suffers capacity issues at peak times and hampers connectivity across the Epsom-Leatherhead sub-region.

The parties agree:

6. They will work with Surrey County Council and Highways England to identify ways to invest in the road network and improve connectivity across the Surrey 2050 Place Ambition's Strategic Opportunity Area 6: the Epsom-Leatherhead corridor, particularly improving movement through the main centres and enhancing connectivity between the main centres and with the M25 (Junction 9).

### **The Horse Racing Industry**

#### **Background**

The horseracing industry is a significant employer in Epsom and north-eastern Mole Valley and racehorse training in and around Epsom is of national significance. Existing horseracing stables should be safeguarded from redevelopment to other uses unless it is proved conclusively that there is no prospect of them being used for racehorse training.

The parties agree:

7. They will work with the Jockey Club and Jockey Club Estates to ensure that racehorse training in Epsom and Ewell and Mole Valley has the conditions to thrive.
8. They will investigate extending MVDC's new Racehorse Training Zone, a designation within which horse racing stables and gallops are safeguarded, into Epsom and Ewell.

### **Non-Significant Matters in the Context of this Statement of Common Ground**

The parties agree:

9. The following matters are defined in the National Planning Policy Framework as strategic matters but which are not significant in the context of this Statement of Common Ground:
  - Affordable housing, employment, retail and leisure;
  - Infrastructure for telecommunications, security, waste management, water supply, wastewater, flood risk, coastal change and the provision of minerals and energy (including heat);
  - 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.

## **5. Governance Arrangements**

The authorities are committed to working positively together, sharing information and best practice and continuing to procure evidence jointly, where appropriate, throughout the plan preparation phase and beyond. This co-operation and collaboration takes place at senior member, chief executive and senior officer as well as at technical officer level.

Joint working will include the following existing governance arrangements:

- The Surrey Place Ambition; and,
- The Surrey Planning Officers' Society; and

This Statement of Common Ground is signed at planning portfolio holder member/chair of Licensing and Planning Policy Committee level and will be reviewed at each key stage of plan-making. It will be updated to reflect progress made through effective cooperation.

In terms of governance, the authorities agree:

10. To continue to work with the other Gatwick Diamond authorities on housing, employment and other strategic issues affecting the Gatwick Diamond as a whole;
11. To continue to work collaboratively on plan preparation and evidence, whilst acknowledging others' timetables and timescales.
12. To respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities;
13. To meet at member and officer level to review the situation and respond to new issues and changing circumstances; and
14. To update this SoCG as progress continues through the preparation of the local plans and development plan documents for each of the authorities.

## Appendix 5:

Statement of Common Ground between Elmbridge Borough Council and Epsom & Ewell Borough Council as part of the Elmbridge Local Plan process.  
Date of SOCG: July/August 2023

### 1. List of Parties involved:

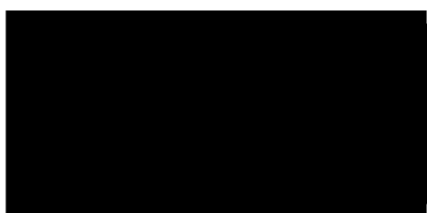
- Elmbridge Borough Council (EBC)
- Epsom and Ewell Borough Council (EEBC)

### 2. Signatories:



08.08.2023

**Elmbridge Borough Council**  
**Kim Tagliarini, Head of Planning & Environmental Services**



18/07/2023

18.07.2023

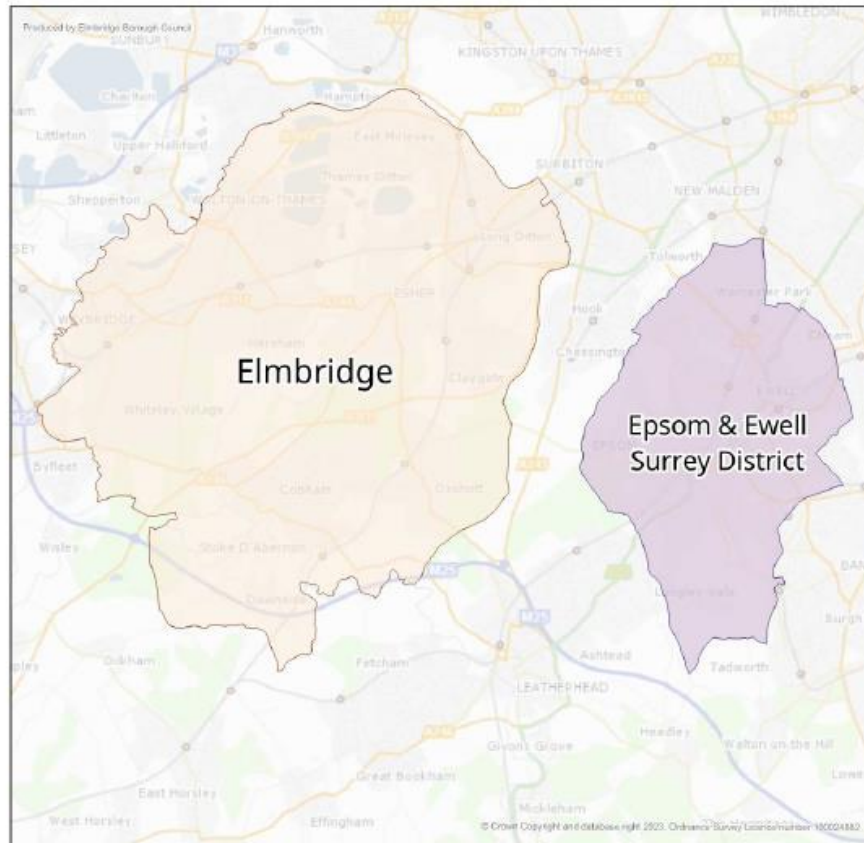
**Epsom and Ewell Borough Council**  
**Councillor Steven McCormick, Chair of the Licencing and Planning Policy Committee**

### 3. Strategic Geography

The Statement of Common Ground (SOCG) is between the local authorities of Elmbridge Borough Council (EBC) and Epsom and Ewell Borough Council (EEBC).

EBC and EEBC are within the Surrey County Council administrative area and are both located within the same Housing Market Area (HMA). They do not share an administrative boundary; being physically separated by the Royal Borough of Kingston upon Thames. Both areas are similarly influenced by London in terms of the economy and overspill. In terms of planning, both authorities have extensive areas designated as Green Belt and both have areas of common land and heritage assets which constrain development.

The map below shows the authorities in relation to each other (i.e., indicated with the black administrative boundaries).



#### 4. Strategic Matters

##### Duty to Cooperate

EBC and EEBC have engaged with one another to discuss duty to cooperate matters throughout the preparation of their respective Local Plans. This has included engagement and joint working on evidence base documents; through meetings; and at the Regulation 18 & 19 Stages (where relevant).

Their duty to cooperate activities are recorded in the following documents:

- EBC's Duty to Cooperate Statement of Compliance (June 2022)
- EEBC's Duty to Cooperate Framework (September 2022)

Both authorities agree that the above documents are an accurate record of their engagement up until EBC's Regulation 19 consultation in June 2022; with the EEBC Framework (September 2022) setting out how they intend to engage with EBC and others as they prepare their new Local Plan.

EEBC has raised no objection to the draft Elmbridge Local Plan for failing to comply with the duty. It is a duty that requires cooperation, not agreement, and the two authorities agree that they have cooperated in an ongoing and effective manner as set out in EBC's Statement of Compliance (June 2022) and associated updates, as well as this SoCG.

##### Local Plan Positions

Elmbridge

EBC invited representations on their draft Local Plan (Regulation 19) between 17 June and 29 July 2022. It is the Council's intention to submit its draft Local Plan to the Secretary of State for Levelling-Up, Housing and Communities for independent examination in July 2023.

#### Epsom & Ewell

EEBC are in the process of preparing a new Local Plan and adopted a new Local Development Scheme (LDS) in November 2022. EEBC's Draft Local Plan 2022-2040 consultation (Regulation 18) ran from 1 February 2023 until 19 March 2023.

EEBC's LDS sets out the following timetable for progressing the Local Plan 2040:

- Publication of Submission Draft Local Plan (Regulation 19)- February – March 2024
- Submission and Examination of the Local Plan (Regulation 22) - June 2024
- Adoption - Spring 2025

On 22 March 2023, at an Extraordinary Council meeting, other than for the purpose of analysing the responses of the public consultation to capture residents' views and any new information, EEBC agreed to pause the Local Plan to enable:

- a) further work on brown field sites, including information arising out of the Regulation 18 consultation
- b) further options to be considered that do not include green belt sites
- c) an analysis of Epsom and Ewell's required future housing numbers based on 2018 data
- d) a clearer understanding of the Government's legislative intentions in regard to protections for the green belt and the current mandatory target for housing numbers.

It was also agreed to write to the MP for Epsom and Ewell calling on him to use his influence to get the Government to abandon its use of 2014 data to calculate housing need and accept that all planning and housing policies must reflect the latest data if they are to be effective as well command the respect of the people they affect.

#### **Key Strategic Matters:**

Both authorities through their responses / representations at the Regulation 18 and 19 stages, identified Housing and the Green Belt as outstanding strategic matters. The position of each authority in regard to these matters, is set out as follows:

#### **Housing Need**

##### Elmbridge

The local housing need figure, as set by the Government's Standard Method, is 9,705 (647 dwellings per annum) over 15-years.

Elmbridge's proposed growth strategy focuses on delivering development and increasing capacity in its existing urban areas (a 'brown-field' approach). This includes the reallocation and diversification of employment land, encouraging mixed use development and ensuring the potential of sites is optimised.

This approach provides for 6,785 dwellings, 70% of the local housing need figure. This leaves a local unmet housing need of circ. 2,920 dwellings over its plan period. This includes an element of unmet affordable housing need.

#### Epsom and Ewell

The local housing need figure, as set by the Government's Standard Method, is 576 dwellings per annum (April 2022) which equates to 10,368 dwellings over the plan period.

In seeking to meet their housing need, an assessment of housing land supply has been undertaken as part of the evidence to support the Draft Local Plan (Regulation 18). In the urban areas, it is estimated at approximately 3,700 homes could be sustainably accommodated (circ. 36% of the identified need for housing). Through an assessment and review of the Green Belt, it is considered that a further 2,175 dwellings could be accommodated.

Combining both elements of housing land supply, it is estimated that 56% of the need established by the standard methodology can be met over the plan period.

#### **Green Belt**

##### Elmbridge

EBC has commissioned Arup Ove to undertake two Green Belt Assessments. The first, Green Belt Boundary Review (GBBR) was published in 2016 and examined the performance of the Green Belt in and around Elmbridge against the Green Belt Purposes, as set out in the National Planning Policy Framework (NPPF). The analysis was undertaken at two scales: Strategic Areas and Local Areas.

The 2018 Supplementary Review was a more spatially focused piece of work to better understand the performance of smaller 'sub-areas' against the Green Belt purposes, as well as their context in relation to the wider Green Belt (Local Areas and Strategic Areas, as assessed through the 2016 GBBR).

In addition to the above, the Council has also undertaken further evidence base work on the Green Belt:

- Green Belt Boundary Review – Assessment of Weakly Performing Local Areas 2019: The assessment identifies the extent of development potential within each Local Areas considered to be 'weakly performing' as part of the GBBR 2016 and sets out whether there is an opportunity for large / small-scale development or no development.
- Green Belt Boundary Review – Accessibility Assessment, June 2019: This assessment looks at the sustainability of specific Green Belt areas (weakly performing and smaller sub-divisions) using a range of accessibility standards.
- Green Belt Boundary Review – Assessment of Previously Developed Land, June 2019: This assessment looks at the level of Previously Developed Land (PDL) within specific Green Belt areas (weakly performing and smaller sub-divisions).
- Green Belt Site Proforma – Utilising the information from the above documents and other evidence base documents, the pro-forma considers specific areas of land for potential release from the Green Belt.

The evidence base documents set out that alongside further assessments and evidence base documents, they will be used to inform the Council's preferred approach for the Local Plan and site selection. This includes whether exceptional circumstances exist to justify releasing land from the Green Belt.

EBC's rationale for its proposed development strategy is set out in the Topic Paper: How the Spatial Strategy was formed (June 2022). The Paper sets out the options assessed when considering how to address the Borough's housing need and includes the Council's consideration of whether exceptional circumstances are fully evidence and justified to release land from the Green Belt. The Paper sets the rationale for the Council's recommended spatial strategy within the draft Local Plan; promoting sustainable development and place-making ambition and responding to the Council's commitment to tackle climate change.

#### Epsom and Ewell

EEBC's Green Belt covers some 42% of the area of the borough. As one of the first extensive areas of open space on the southern edge of the Metropolitan area of London, the Green Belt is highly accessible to the urban population.

To support its Regulation 18 Draft Local Plan, EEBC published the Epsom & Ewell Green Belt Technical Note (January 2023) which details the Green Belt evidence used to inform the Draft Local Plan to date and the methodology for future assessments of the Epsom and Ewell Green Belt designation intended to inform the next iteration of the Local Plan.

#### **Transport**

Whilst not adjoining boroughs, there is vehicular movement between the two boroughs via the A243, Rushett Lane and Fair Oak Lane junction that is located within the Royal Borough of Kingston upon Thames.

The Transport Assessment (June 2022) undertaken in support of the draft Elmbridge Local Plan has not identified a significant impact on this junction arising from the growth set out in EBC's preferred development. No mitigation at this junction is therefore required as a result of the draft Elmbridge Local Plan.

Following the assessment of EEBC's proposed development strategy on the Local and Strategic Road Networks, EBC would welcome the opportunity to comment on the impact on this junction and upon the road network into Elmbridge Borough.

#### **Current positions:**

##### Elmbridge draft Local Plan – Epsom & Ewell Borough Council's position

- EBBC acknowledge that Elmbridge is a constrained borough like Epsom and Ewell which makes it challenging to meet development needs.
- EBC's spatial strategy approach and the justification for this are noted as well as the consideration of reasonable alternatives.
- EEBC acknowledged that the EBC can reach its own conclusions that differ from the findings of the Green Belt evidence, however EEBC are concerned with an approach that questions the findings of an independent assessment of how specific land parcels

contribute towards Green Belt purposes as set out in the National Planning Policy Framework (NPPF).

- EEBC consider that wider unmet needs (of the HMA and Neighbouring Authorities) should be appropriately considered in determining whether exceptional circumstances apply to justify altering Elmbridge's Green Belt boundaries to meet the borough's housing needs (whilst protecting the character of its existing communities) and not continue to add to the wider unmet housing needs and if possible, assist to help in meeting the wider unmet need as well.
- The concerns raised by EEBC in their representation on EBC's Local Plan Regulation 19 on the Green Belt will be a matter for the Planning Inspector to decide upon during the Local Plan examination in public.
- It is acknowledged that as EBC is not meeting its own local housing need in full, it cannot be relied upon to meet any of EEBC's unmet housing need.

#### Epsom & Ewell's emerging Local Plan – Elmbridge Borough Council's position

- EBC acknowledges that the scale of change required to boost housing supply across Epsom and Ewell is very significant.
- It is noted that EEBC have explored a range of options to meet its housing need and that it has a similar challenging context to Elmbridge.
- It is acknowledged that as EEBC is not meeting its own local housing need in full, it cannot be relied upon to meet any of EBC's unmet housing need.
- EBC has concerns at to the consideration of the setting and special character of 'historic towns' within the Green Belt methodology and the implication this has on the assessment of Green Belt.
- EBC requests that EEBC continues to take into account Elmbridge's unmet housing need when preparing the EEBC Local Plan and whether they can assist in meeting any of EBC's unmet housing need.
- EBC welcomes the opportunity to make further comments / representations on the next iteration(s) of the EEBC Local Plan and associated evidence base.

#### **The parties agree:**

1. Due to the fact that local housing need figures do not take account of Green Belt and other constraints, any local authority with significant Green Belt land is likely to be unable to meet its housing need figure.
2. Neither local authority can assist in meeting any of the unmet housing need arising from the other.
3. The proposed development strategies for each Local Planning Authority will be investigated through the Examination-in-Public process and it will be for the Planning Inspector to determine whether they are sound.
4. Despite the difficulties of meeting Local Housing Need, the two authorities will continue to discuss any significant development and changes in housing land supply and approach that could enable the issue of unmet housing to be resolved.

#### **Matters not specifically addressed within this Statement of Common Ground**

The parties agree:

The following matters are defined in the NPPF as strategic matters but are not specifically addressed in the context of this Statement of Common Ground (the authorities continue to work together on these matters as appropriate).

- Gypsies, Travellers, and Traveller Showpeople;
- Flooding; and
- Climate Change

The authorities agree that the engagement undertaken on these issues as set out in their respective Duty to Cooperate: Statement of Compliance documents is, an accurate record and that there are no unresolved issues.

It is also agreed that the authorities will continue to work on these matters as appropriate.

## **5. Governance Arrangements**

The authorities are committed to working positively together, sharing information and best practice, and continuing to procure evidence jointly, where appropriate, throughout the plan preparation phase and beyond. This co-operation and collaboration takes place at senior member, chief executive, and senior officer as well as at technical officer level.

Joint working will include the following existing governance arrangements:

- Surrey Leaders;
- Surrey Chief Executives;
- Surrey Futures;
- The Surrey Planning Officers' Association (SPOA); and
- Surrey Planning Working Group (PWG).

In terms of governance, the authorities agree:

- that in response to any new evidence / changes in circumstances, informal discussions will occur between the two authorities on the cross-boundary issues referred to in this SoCG in the form of officer level meetings with escalation of matters to Member level where necessary;
- that this SoCG will be reviewed at the above meetings or, when required by either authority e.g. for the purpose of their Examination;
- to continue to work collaboratively on plan preparation and evidence, whilst acknowledging others' timetables and timescales;
- to respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities; and
- to continue to work with the other Surrey authorities on housing, employment and other strategic issues affecting Surrey as a whole.