

**Epsom and Ewell**  
**Local Plan** 2022-2040



# **Duty To Co-operate Framework**

**January 2023**

# Contents

1	Introduction.....	1
1.1	The DTC Framework .....	1
2	Defining Duty to Cooperate Bodies .....	2
2.1	Local Planning Authorities .....	2
2.2	Prescribed Bodies.....	2
2.3	Existing mechanisms .....	3
2.4	Responding to Duty to Cooperate Requests.....	4
3	Strategic Matters to be addressed within a Local Plan.....	6
4	Identified strategic cross boundary issues, relevant DTC bodies and method of engagement.....	7
4.1	Meeting identified housing needs within the borough and wider unmet housing needs.....	7
4.2	Meeting the identified need for Gypsy and Traveller accommodation within the borough and wider unmet needs.....	11
4.3	Supporting the local economy: the horse racing industry .....	14
4.4	Flood risk (principally from surface water) .....	15
4.5	Improve sustainable transport choices, particularly in association with new development .....	17
4.6	Meeting education needs, including Special Educational Needs and Disabilities (SEND).....	18
5	Collaboration on Evidence Base .....	21
	Appendix 1 .....	23
	Appendix 2.....	25

# 1 Introduction

The Duty to Co-operate (DTC) is a legal requirement on local planning authorities to engage with other relevant authorities and bodies constructively, actively and on an ongoing basis for strategic planning matters.

The purpose of this DTC framework is to ensure that the strategic cross boundary issues that need to be addressed throughout the preparation of the Council's Local Plan (2022-2040) have been identified at an early stage and engagement undertaken in relation to these are documented.

A draft framework was consulted upon in May/June 2022 with the Council's DTC bodies to ensure there was early consensus on the issues. The framework is considered to be a live document, which will be updated throughout the preparation of the Local Plan. This version is the most recently published update. The final framework will form part of the Council's Local Plan evidence base with regards to the DTC.

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

## 1.1 The DTC Framework

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

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

## 2 Defining Duty to Cooperate Bodies

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

### 2.1 Local Planning Authorities

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

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

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

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

### 2.2 Prescribed Bodies

Planning Policy Guidance requires local authorities to co-operate with a number of prescribed national bodies / organisation as per the Localism Act<sup>1</sup>. They include the following bodies who are, themselves, subject to the DTC:

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

---

<sup>1</sup> Localism Act (2011) Section 33A (1) (c)

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

### **2.3 Existing mechanisms**

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

- **The Surrey Planning Officers Association (SPOA)**  
SPOA comprises the Heads of Planning service from the eleven Surrey district and boroughs and Surrey County Council.
- **Surrey Planning Working Group (PWG)**  
PWG is made up of the leading policy planning officers from all eleven district councils and the County Council. The group reports to SPOA and provides a forum for information sharing and discussion on technical matters relating to planning policy development in the context of national, strategic and local priorities. The group provides a forum through which strategic and cross boundary issues can be raised in relation to the DTC and taken forward to more senior groups where necessary.
- **Surrey Leaders Group**  
The Surrey Leaders' group is formed of the Leaders of the eleven Surrey local authorities. It provides a political forum where strategic issues can be discussed.
- **Joint Place Team arrangements between Surrey CC & EEBC**  
Regular meetings are held to discuss a variety of planning related issues
- **Surrey Futures Steering Board, including working groups to deliver the Surrey 2050 Place Ambition (specifically the Epsom-Leatherhead Strategic Opportunity Area)**  
The Surrey Future partnership, which includes Surrey's district and borough councils, Surrey County Council, the Coast to Capital and Enterprise M3 Local Enterprise Partnerships, Gatwick Diamond Business and the Surrey Nature Partnership has produced Surrey's 2050 Place Ambition, a non-statutory, strategic spatial investment framework for the county. It presents what Surrey's strategic partners want to collectively achieve in terms of "good growth". The document

includes eight 'strategic opportunity areas' one of which is the Epsom to Leatherhead corridor.

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

## **2.4 Responding to Duty to Cooperate Requests**

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

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

other authorities/ bodies on matters which have been identified as being of relevant cross boundary significance;

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

### **3 Strategic Matters to be addressed within a Local Plan**

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

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

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



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

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

### STRATEGIC CROSS BOUNDARY MATTER

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

##### Overview of issue

Evidence to date suggests that EEBC will find meeting its housing needs, as identified by the government's standard method, extremely challenging. This is an issue faced by many of our neighbouring authorities and those across Surrey. Appendix 1 contains a table to show the current position (January 2023) of local planning authorities in Surrey and those adjoining EEBC.

##### Background

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

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

EEBC has been gathering evidence to identify how to sustainably accommodate this significantly increased housing need. To date a Land Availability Assessment (LAA) (2022), Housing and Economic Development Needs Assessment (HEDNA) (2023) and Green Belt Study (2023) have been produced. 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. 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

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

base methodology, DTC meetings and responding to formal consultations/requests.

In November 2022, when work on the LAA was largely complete, EEBC wrote to its relevant DTC partners with regards to the borough's housing land supply position. The letter (available in appendix 2) broadly summarised the findings of the LAA, setting out that the borough's urban area could potentially accommodate 3,849 dwellings or 37% of the calculated housing need. A request was made to the relevant DTC partners to assist with meeting some or all, of the approximate 6,500 shortfall. Given the significant shortfall, the request was also sent to those authorities beyond Surrey. Following the close of the consultation, eleven authorities (identified in the 'authorities engaged' section below) responded with none being able to provide assistance towards meeting EEBC's unmet needs.

## **PARTNERS AND CONSIDERATIONS**

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

### **Adjacent Local Authorities**

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

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

#### **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.'

#### **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 are currently consulting on a Local Plan Regulation 18 draft which seeks to meet their housing need (as identified in the London Plan) for a 10-year period. RBK have written to EEBC (December 2022) seeking assistance in meeting

housing needs due to uncertainties surrounding some of their potential sites.

### **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.

### **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 seeks to deliver 6,780 over the 15-year plan period (452 dpa) with 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 meet any external unmet need. EBC confirmed they were unable to assist in meeting EEBC's potential unmet need in December 2022.

### **Wider Surrey Authorities**

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

### **Other Authorities**

#### **Surrey County Council (SCC)**

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

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

The London Plan 2021 identifies the housing targets for each London Borough. It is stated<sup>3</sup> that Greater London is considered as a single HMA and it does not identify any surplus capacity to accommodate unmet housing need outside Greater London.

### **Requests from Other Authorities**

---

<sup>3</sup> Paragraph 4.1.2

Requests received to help meet unmet housing needs from:

- 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 Engaged**

The authorities below were engaged in seeking assistance to meet housing needs:

Elmbridge Borough Council  
Mole Valley District Council (responded)  
Royal Borough of Kingston Upon Thames  
London Borough of Sutton  
Elmbridge Borough Council (responded)  
Guildford Borough Council (responded)  
Reigate & Banstead Borough Council  
Runnymede Borough Council  
Spelthorne Borough Council (responded)  
Surrey Heath Borough Council (responded)  
Tandridge Borough Council  
Waverley Borough Council (responded)  
Woking Borough Council  
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 (responded)  
Wokingham District Council  
Hart District Council (responded)  
Rushmoor District Council (responded)  
East Hampshire District Council  
Chichester District Council  
Horsham District Council (responded)  
Mid Sussex District Council (responded)  
Crawley Borough Council  
Sevenoaks District Council

### **Bodies Engaged**

## **Mechanism for Engagement**

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

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

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

Formal Local Plan consultations: Regulation 18 and 19

## **STRATEGIC CROSS BOUNDARY MATTER**

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

#### **Overview of issue**

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

<b>Years</b>	<b>0-5</b>	<b>6-10</b>	<b>11-15</b>	<b>16-18</b>	<b>Total</b>
	<b>2022-27</b>	<b>2027-32</b>	<b>2032-37</b>	<b>2037-40</b>	
	6	1	2	1	10

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

A recent Court of Appeal decision is likely to impact on the definition for a Gypsy, Traveller or Travelling Showperson as set out in government policy. This may influence the identified need for additional pitches for the borough.

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

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

In November 2022, when work on the LAA was largely complete, EEBC wrote to its relevant DTC partners with regards to the borough's Gypsy and Traveller site needs. The letter (available in appendix 2) 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 (identified in the 'authorities engaged' section below) responded with none being able to provide assistance towards meeting EEBC's unmet needs.

## **PARTNERS AND CONSIDERATIONS**

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

### **Adjacent Local Authorities**

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

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

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

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

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

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

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

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

### **Authorities within the HMA**

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

EBC are within the same HMA as EEBC and 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.

### **Wider Surrey Authorities**

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

### **Other Authorities**

#### **Surrey County Council (SCC)**

SCC have been working with the Boroughs and Districts to address transit provision at the county level. A transit site within Tandridge is currently 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.

### **Requests from Other Authorities**

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

### **Authorities Engaged**

All four neighbouring authorities were engaged as part of the EEBC GTAA. The authorities below were engaged in seeking assistance to meet Gypsy and Traveller site needs.

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

Elmbridge Borough Council (responded)  
Guildford Borough Council (responded)  
Reigate & Banstead Borough Council  
Runnymede Borough Council  
Spelthorne Borough Council (responded)  
Surrey Heath Borough Council (responded)  
Tandridge Borough Council

Waverley Borough Council (responded)  
Woking Borough Council  
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 (responded)  
Wokingham District Council  
Hart District Council (responded)  
Rushmoor District Council (responded)  
East Hampshire District Council  
Chichester District Council  
Horsham District Council (responded)  
Mid Sussex District Council (responded)  
Crawley Borough Council  
Sevenoaks District Council

#### **Bodies Engaged**

#### **Mechanism for Engagement**

Contact via the consultants preparing the GTAA

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

Formal Local Plan consultations: Regulation 18 and 19

## **STRATEGIC CROSS BOUNDARY MATTER**

### **4.3 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.

#### **Background**

Horse racing plays an important role in our local economy and the Borough is an established location for the racehorse training industry. The industry is concentrated to the south of the Borough within the Green Belt and there are a number of gallops on Walton and Epsom Downs. EEBC is supportive



of local racehorse training industry and aware of the challenges it faces, particularly from the loss of facilities to other uses.

## **PARTNERS AND CONSIDERATIONS**

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

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

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

The Jockey Club owns Epsom Downs Racecourse and Training Grounds, and is responsible for the operation of the racecourse and the management and maintenance of the racehorse training grounds at Epsom.

### **Authorities Engaged**

Mole Valley District Council

### **Bodies Engaged**

### **Mechanism for Engagement**

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

Formal Local Plan consultations: Regulation 18 and 19

## **STRATEGIC CROSS BOUNDARY MATTER**

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

#### **Overview of issue**

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

south of the Borough on to the clay underlying the urbanised north of the borough and groundwater flooding from the chalk.

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

### **Background**

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

### **PARTNERS AND CONSIDERATIONS**

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

### **Authorities Engaged**

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

### **Bodies Engaged**

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

### **Mechanism for Engagement**

Surrey Flood Risk Partnership Board

Contact via the consultants preparing the SFRA

Engagement on sequential testing of site with the EA and SCC

Formal Local Plan consultations: Regulation 18 and 19

## **STRATEGIC CROSS BOUNDARY MATTER**

### **4.5 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.

#### **Background**

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

## **PARTNERS AND CONSIDERATIONS**

#### **Surrey County Council (SCC)**

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

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

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

<b>Network Rail (NR), South Western Railways (SWR) and Southern Railways (SR)</b>
<p><b>Authorities Engaged</b></p> <p>Surrey County Council (engaged as part of the Transport Assessment including site accessibility)</p>
<b>Bodies Engaged</b>
<p><b>Mechanism for Engagement</b></p> <p>Via evidence base studies, such as Transport Assessments.</p> <p>Engagement on the Infrastructure Delivery Plan</p> <p>Formal Local Plan consultations: Regulation 18 and 19</p>

<p><b>STRATEGIC CROSS BOUNDARY MATTER</b></p> <p><b>4.6 Meeting education needs, including Special Educational Needs and Disabilities (SEND).</b></p>
<p><b>Overview of issue</b></p> <p>The Borough’s considerable housing need, as identified through the government’s standard method, is likely to generate additional demand for school places throughout the local plan period. EEBC will work closely with Surrey County Council and adjoining local authorities to ensure future educational needs can be adequately met.</p> <p><b>Background</b></p> <p>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 2020-2030. For Epsom &amp; Ewell, this identifies that for primary schools within the Borough any exceptional demand will stem from new housing or unexpected migration. For secondary schools the strategy is to fill existing vacant capacity before seeking to commission any additional provision. The proximity of some</p>

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

## **PARTNERS AND CONSIDERATIONS**

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

### **Surrey County Council (SCC)**

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

### **Adjacent Local Authorities**

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

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

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

In response to consultation on this 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.'

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

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

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

### **Authorities Engaged**

Surrey County Council  
Mole Valley District Council

### **Bodies Engaged**

### **Mechanism for Engagement**

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

Engagement on the Infrastructure Delivery Plan

Formal Local Plan consultations: Regulation 18 and 19

### **Other Issues**

There are a number of other topic areas where co-operation with partners may be required to address specific issues. These topic areas include:

- Biodiversity
- Water resources
- Water quality
- Waste infrastructure
- Community facilities
- Heritage

At this stage in the development of the local plan, specific issues have not been identified for these topics. Should specific issues arise, these will be added to the framework accordingly. Otherwise, engagement on these topic areas will take place through evidence gathering and formal/informal consultation on the local plan.

## 5 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.

### 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

### 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.

### 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

### **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



**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 18 consultation due February 2023	181 Core Strategy (2007)	576	Reg 18 identifies provision for 300 dpa or 5,400 over the plan period. Shortfall: 4,968 dwellings
Mole Valley District Council	Submitted for examination Feb 2022. Local Plan period 17 years.	188 Core Strategy (2009)	456	Submitted Local Plan aims to deliver 353 dpa or 6,000 over the plan period. Shortfall: 1,700 dwellings
Reigate & Banstead Borough Council	Not currently preparing a new Local Plan	460 Core Strategy (2014) reviewed 2019	644	Unknown.
London Borough of Sutton	Local Plan adopted 2018	427	807	Unknown. The London Plan (2021) identifies a target of 469 dpa
Royal Borough of Kingston Upon Thames	Regulation 18 consultation underway (Nov 22 to Feb 23)	964 London Plan (2021)	2037	Reg 18 commits to deliver 9,640 homes between 2019/20 and 2028/29 (964 dpa)

Elmbridge Borough Council	Regulation 19 consultation completed June/July 22	225 Core Strategy (2011)	647	Reg 19 seeks to deliver 6,780 over the 15-year plan period (452 dpa) Shortfall: 2,925 dwellings
Guildford Borough Council	Local Plan: Strategy and sites adopted 2019	562	776	Recent adoption of Local Plan; potential for unmet need given the higher standard method figure
Runnymede Borough Council	Local Plan adopted 2020	500	533	Review of Local Plan commenced 2021. Unknown if any unmet needs at this time.
Spelthorne Borough Council	Submitted for examination Nov 2022	166 Core Strategy (2009)	618	Submitted plan seeks deliver 9,270 over the 15-year plan period (618 dpa) Shortfall: None
Tandridge District Council	Submitted for examination Jan. 2019 – plan is still in active examination	125 Core Strategy (2008)	644	Submitted plan seeks to provide 303 dpa. Over 50% unmet need compared to standard method
Waverley Borough Council	Local Plan adopted 2018	590	703	Adopted plan met identified needs at the time and 50% of Woking's unmet needs (83 dpa).
Woking Borough Council	Not currently preparing a new Local Plan	292 Core Strategy (2012)	429	Unknown

## Appendix 2: Housing Land Supply letter to relevant DTC partners

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