

Statement of Common Ground

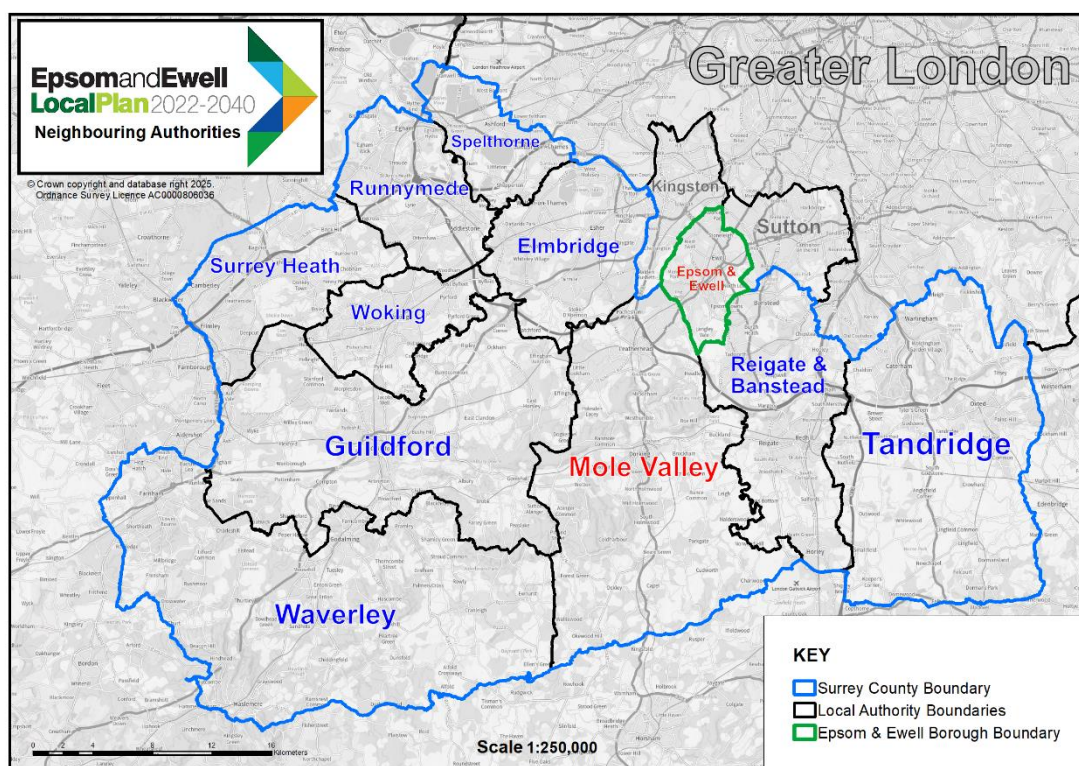
This Statement of Common Ground (SoCG) is between Epsom & Ewell Borough Council (EEBC) and Mole Valley District Council (MVDC) in relation to the Epsom & Ewell Local Plan 2040.

1) Constituent parties to this SOCG

Epsom & Ewell Borough Council (EEBC)
Mole Valley District Council (MVDC)

2) Geographical area covered by this SOCG

The map below shows the geographical position of EEBC and MVDC.



EEBC and MVDC share a boundary within the Surrey County Council administrative area. Both are located within the same Housing Market Area (HMA) and are similarly influenced by London in terms of the economy and overspill. Both areas have extensive Green Belt designations and heritage assets which constrain development. In terms of physical connectivity, the A24 connects both authorities to the M25 via Junction 9 and share rail routes into London. Natural environments and health and education functions also cross boundaries.

3) Duty to Cooperate

EEBC and MVDC have engaged with one another to discuss duty to cooperate matters throughout the preparation of their Local Plans. This has included engagement and joint working on evidence base documents, through correspondence/meetings and at the Regulation 18 and 19 Local Plan stages. Duty to cooperate activities up until the Regulation 19 stage are recorded in the [Duty to Cooperate Statement of Compliance](#) (November 2024), while the Duty to Cooperate Statement of Compliance Update will document any activities from November 2024 up until submission.

MVDC adopted their Local Plan in October 2024. MVDC and EEBC signed a Statement of Common Ground in June/July 2021 prior to the submission of MVDC's now adopted Local Plan for examination in February 2022.

EEBC invited representations on the Proposed Submission Local Plan (Regulation 19) between 20 December and 5 February 2025. A copy of the representation submitted by MVDC is available in Appendix 1.

4) Key strategic cross boundary matters between the constituent parties to this agreement

Housing needs

EEBC's Proposed Submission Local Plan (December 2024) contains a requirement to deliver at least 4,700 homes between 2022 and 2040. This will deliver on average 261 new homes per year, which is approximately 46% of need identified through the standard method

MVDC's Local Plan (October 2024) contains a requirement to deliver at least 6,381 new homes between 2020 and 2039. This will deliver on average 336 new homes per year, which is approximately 75% of need identified through the standard method in effect prior to the 12 December 2024 National Planning Practice Guidance update. MVDC will undertake an early review of the plan before its third anniversary to ascertain whether more housing capacity is deliverable or developable.

The MVDC/EEBC Statement of Common Ground (2021), established that neither authority was able to accommodate each other's unmet housing needs. This position has been reconfirmed on subsequent occasions through formal requests for assistance from EEBC (December 2022 and July 2024), MVDC's formal responses to the Regulation 18 and 19 consultations, and through Duty to Cooperate meetings.

Both parties agree that:

- EEBC and MVDC are unable to meet their housing need full, as identified through the standard method that applied prior to the 12 December 2024 National Planning Practice Guidance update and are therefore unable to assist with meeting each other's needs.

Gypsy & Traveller accommodation needs

Both MVDC and EEBC agreed in the MVDC/EEBC Statement of Common Ground (2021) to seek to meet their own need for additional Gypsy and Traveller pitch provision.

Subsequently, EEBC has identified a need for an additional 18 pitches over the local plan period, which reflects the December 2023 revised definition of a Gypsy and Traveller, as set out in national policy¹. When its evidence indicated it would be difficult to meet this need within the borough, EEBC sought assistance from its Duty to Cooperate partners.

MVDC confirmed they were unable to assist in response to a formal request from EEBC in November 2022. This position was confirmed again through MVDC's formal responses to the Regulation 18 and 19 consultations, and through a subsequent Duty to Cooperate meeting in May 2024. The EEBC Proposed Submission Local Plan contains an allocation for 10 Gypsy and Traveller pitches, leaving an unmet need of 8 pitches.

The revised planning definition of a Gypsy and Traveller has resulted in an increase in MVDC's Gypsy and Traveller need from 32 pitches to 52 pitches. MVDC is currently identifying how this additional need can be met.

Both parties agree that:

- EEBC is seeking to meet a proportion of its identified need through the allocation of 10 pitches within the Proposed Submission Local Plan. An unmet need for 8 additional pitches remains. Policy S8 protects existing Gypsy and Traveller provision in the borough and provides a policy framework against which proposals for traveller sites will be considered. Policy S8 also sets out a requirement for provision of traveller pitches on larger unallocated windfall sites, which may assist in boosting supply over the Local Plan period.
- MVDC's Local Plan (October 2024) makes provision for up to 34 Gypsy and Traveller pitches. The revised national planning definition of a Gypsy and Traveller has increased MVDC's need for additional pitches from 32 to 52 pitches.
- Both authorities are unable to meet needs arising from outside their own administrative boundaries.

¹ Planning Policy for Travellers December 2023

The Horse Racing Industry

Horse racing plays an important role in both EEBC and MVDC's local economies, and both are aware of the challenges it faces, particularly from the loss of facilities to other uses. Working together, along with the Jockey Club and Jockey Club Estates, the authorities have sought to address this issue in their respective Local Plans, with bespoke policies and the designation of a continuous, cross-boundary Racehorse Training Zone.

Both parties agree that:

- Their respective Local Plan policies and the designation of a cross-boundary Racehorse Training Zone (MVDC Local Plan October 2024 and EEBC Proposed Submission Local Plan) provide a suitable framework to appropriately safeguard and support the horseracing industry.

Education

There are linkages between EEBC and MVDC in terms of education infrastructure. Both authorities work with Surrey County Council to ensure there is sufficient provision to meet future needs at the early years stage through to post 16 education/training, and for Special Educational Needs and Disabilities (SEND).

Surrey County Council has provided both EEBC and MVDC with bespoke forecasts to identify the primary and secondary pupil place growth arising from their respective Local Plans. These forecasts identify that there is sufficient capacity within the existing school estate to accommodate the pupil growth. Additional SEND provision has been delivered in both authorities in recent years.

Both parties agree that:

- Both authorities will continue to liaise with, and provide data to Surrey County Council, to inform their annual school place planning forecasts to ensure needs continue to be met.

Healthcare

There are linkages between EEBC and MVDC in terms of healthcare infrastructure and both authorities fall within the NHS Surrey Heartlands Integrated Care Board area.

EEBC has worked with the Surrey Heartlands ICB to identify the impact on primary healthcare which arises from the Proposed Submission Local Plan, and identify potential schemes to mitigate this, which are reflected in the plan.

MVDC has liaised with Surrey Heartlands on a similar level and the Local Plan (October 2024) allocates sites for enhanced healthcare provision.

Both parties agree that:

- Both authorities will continue to liaise with and provide data to the NHS Surrey Heartlands ICB to ensure healthcare infrastructure needs continue to be met.

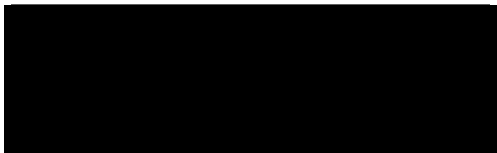
Transport & Highways

The most significant shared transport/highways issue relates to Junction 9 of the M25 which suffers capacity issues at peak times and hampers connectivity across the Epsom-Leatherhead sub-region.

Both parties agree that:

- Surrey County Council and National Highways will identify and deliver schemes to mitigate the impact of growth on the highway network.

5) Signatories



Councillor Peter O'Donovan
Chair of Licencing and Planning Policy Committee
Epsom & Ewell Borough Council
11 February 2025



Councillor Margaret Cooksey
Cabinet Member for Planning
Mole Valley District Council
5 February 2025

Appendix 1: MVDC Regulation 19 Representation



Planning Policy
Epsom and Ewell Borough Council
By email: localplan@epsom-ewell.gov.uk

If telephoning please ask for: [REDACTED]
01306 885001
Email: planning.policy@molevalley.gov.uk

29 January 2025

Epsom and Ewell Reg 19 Proposed Submission Local Plan 2022-2040 Consultation

Dear Ian Mawer,

Thank you for consulting Mole Valley District Council (MVDC) on the Epsom and Ewell Borough Council (EBBC) Reg 19 Proposed Submission Local Plan 2022-2040.

MVDC Local Plan

MVDC's Local Plan was adopted in October 2024. It covers the period 2020-2039. The Council will undertake an early review of the plan before its third anniversary to ascertain whether more housing capacity is deliverable or developable. The Council will therefore spend the period up to October 2027 assessing the need for and supply of housing across the district and also exploring opportunities beyond the district borders. The Local Development Scheme setting out the programme of action and evidence gathering for this process goes to the Mole Valley District Council's 4th February Cabinet meeting.

Housing

EEBC's housing need, based on the current standard calculation, is 569 new dwellings per annum, which is 10,242 dwellings across the Plan period 2022 to 2040. Its proposed Local Plan provision (4,700) would meet 46% of this figure. Under the new standard method, these figures would increase to 889 dwellings per annum or 16,002 over the Plan period, the Local Plan meeting 29% of this figure. It is noted that around 32% of the EBBC's supply is derived from allocations to be inset from the Green Belt.

Mole Valley is subject to fundamental restrictions that constrain its housing supply. 77% of MVDC's area is designated as either Green Belt or National Landscape. The built-up area only comprises 11% of the area and the two principal towns, Leatherhead and Dorking, are historic market towns with significant and extensive heritage constraints limiting development to little more than very gentle densification. As a result of these constraints, MVDC's adopted local plan can only meet only approximately 75% of its own need and these constraints have meant that a significant proportion of housing has come through the release of an element of Green Belt land. Having just been through this exhaustive search for housing capacity within the district, MVDC now faces the need for further revaluation to ascertain whether more housing is deliverable or developable. Without pre-empting this process, given all the district's constraints and the relatively short turnaround time between the adoption of the current Local Plan and the conclusion of the forthcoming review, this will prove immensely challenging, and it is very difficult to conceive how this might result in MVDC being able to meet any of EEBC's unmet housing need.

Gypsies and Travellers

Pippbrook, Dorking, Surrey, RH4 1SJ
01306 885001 | molevalley.gov.uk | info@molevalley.gov.uk



A need for 18 pitches for Gypsy and Traveller households in Epsom and Ewell has been identified and EEBC Reg 19 Plan allocates 10 pitches towards this as part of mixed-use site allocation SA35. The need figure significantly below that for Mole Valley, which has an identified need of 52 Gypsy and Traveller pitches over its draft Local Plan period (using the 2024 NPPF definition of Gypsies and Travellers). EEBC's strategy for delivering the outstanding 8 pitches is unclear. Policy S8 proposes Gypsy and Traveller accommodation to be provided on development sites of 200 C3 homes or more, with the exceptions of the town centre or when it would have a "significant negative impact on the efficient use of land." It is noted that only one site outside the town centre is allocated for over 200 residential units. One strand of MVDC's strategy for meeting its need intensifies specific existing Gypsy and Traveller sites, while another provides for 3 new pitches on allocated sites exceeding 100 dwellings, with the exception of certain locations such as town centres or near railway stations. Lowering its dwelling threshold could assist EEBC in meeting its outstanding need. Based on the 2021 NPPF definition, for MVDC, the five-year target from adoption and the need over the plan period should both be met. However, MVDC is reliant on (albeit robust) windfall provision to meet the 2024 NPPF Gypsy and Traveller definition. The margin for manoeuvre is therefore tight, especially if one or more sites fails to be developed. MVDC is not, therefore, in a position to accommodate EEBC's unmet Gypsy and Traveller need.

Employment

EEBC's Housing and Economic Development Needs Assessment (HEDNA) shows that there is demand for additional employment floorspace in the area to meet the needs of existing businesses and to cater for new businesses. Policy S1 states that employment needs will be met through the development and intensification of the strategic employment sites and the delivery of additional employment floorspace that is compatible with the residential use in the Epsom Town Centre. However, neither the additional floorspace requirement nor the relative capacity of these sites and areas to absorb this floorspace is identified.

MVDC's Economic Development Needs Assessment identified no significant additional floorspace requirements for office or industrial land uses. MVDC therefore did not include employment-only allocations in the adopted Local Plan. However, MVDC will be re-examining this policy thoroughly as part of the Local Plan's review on the basis that, after a period of flux, future trends should be easier to identify. However, it is clear that any capacity to absorb potential unmet EEBC employment needs, should assessments demonstrate a surplus of provision within Mole Valley, will be severely constrained by the imperative of responding to housing needs.

Racehorse training zone

MVDC welcomes the creation of racehorse training zone policy within EEBC to complement MVDC's adoption of such an area within its boundaries.

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

Yours sincerely,



Duncan Clarke
Planning Policy Manager
Mole Valley District Council