

Statement of Common Ground

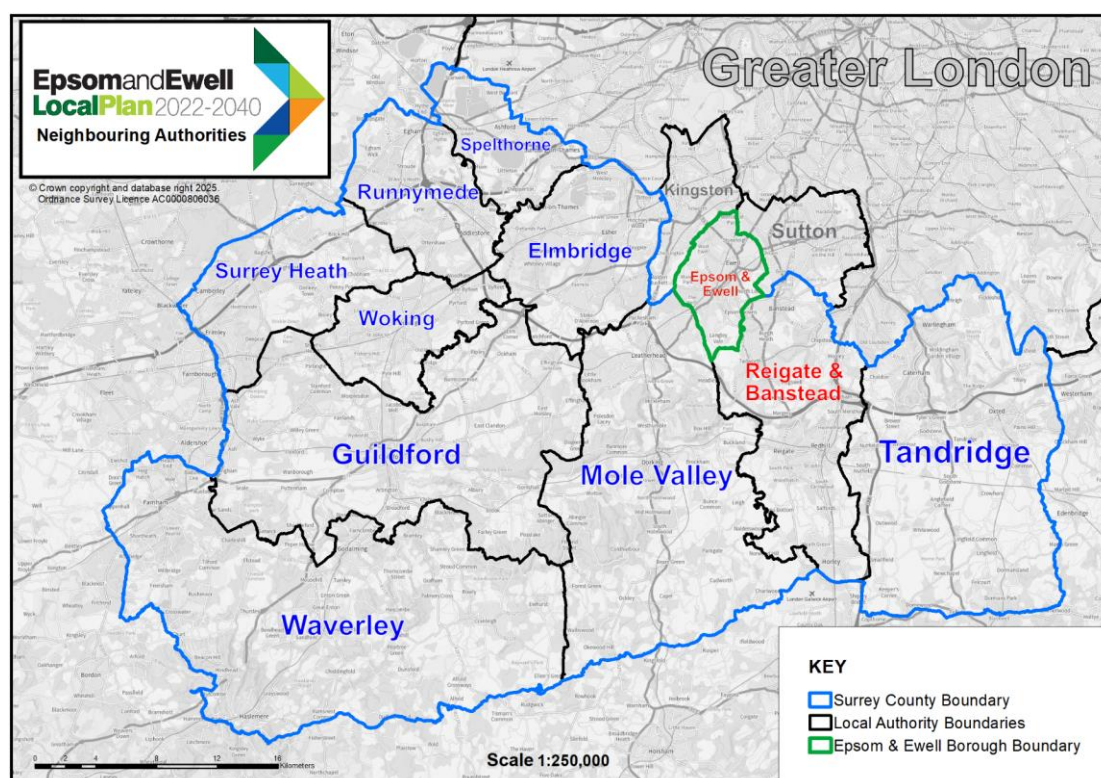
This Statement of Common Ground (SoCG) is between Epsom & Ewell Borough Council (EEBC) and Reigate and Banstead Borough Council (RBBC) in relation to the Epsom & Ewell Local Plan 2040.

1) Constituent parties to this SOCG

Epsom & Ewell Borough Council (EEBC)
Reigate & Banstead Borough Council (RBBC)

2) Geographical area covered by this SOCG

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



EEBC and RBBC share a boundary within the Surrey County Council administrative area. Both 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 A240 connects both authorities, while Tattenham Corner and Epsom Downs stations located within RBBC are close to the boundary of EEBC. Natural environments and health and education functions also cross boundaries.

3) Duty to Cooperate

EEBC and RBBC have engaged with one another to discuss duty to cooperate matters throughout the preparation of their Local Plans. This has included engagement through correspondence/meetings and at the formal 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.

RBBC commenced work on a new Local plan in early 2023.

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 RBBC 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 in effect prior to the 12 December 2024 National Planning Practice Guidance update.

RBBC's current Local Plan (adopted 2014 and reviewed 2019 and 2024) contains a housing requirement to deliver at least 6,900 homes between 2012 and 2027, which is approximately 460 new homes per year. Under the standard method (post the 12 December 2024 National Planning Practice Guidance) the housing need figure for RBBC is 1,306 new homes per year.

RBBC has stated in response to consultation on EEBC's Duty to Cooperate Framework that the borough is heavily constrained and as such is unable to meet unmet housing need for EEBC. This was reconfirmed through RBBC's formal responses to the Regulation 18 and 19 consultations and through Duty to Cooperate meetings.

Both parties agree that:

- EEBC 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 needs arising from other authorities.

- RBBC are gathering evidence to identify capacity for new dwellings to inform its emerging Local Plan. However, greenbelt, flood risk, the Surrey Hills National Landscape, and other constraints mean that RBBC will find it particularly challenging to meet its own 2024 Standard Methodology housing need. There is unlikely to be capacity to meet the needs arising from other authorities.

Gypsy & Traveller accommodation needs

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 has sought assistance from its Duty to Cooperate partners. RBBC confirmed they were unable to assist through a formal response in July 2024 and through a subsequent Duty to Cooperate meeting.

RBBC have an adopted Development Management Plan (2019), which includes allocations for Gypsy and Traveller pitches and for Travelling Showperson plots. RBBC currently maintains a five-year supply of traveller pitches based on a 2017/18 study which informed the Development Management Plan (2019). RBBC is currently undertaking a new Gypsy and Traveller Accommodation Assessment (GTAA) to inform the emerging Local Plan.

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.
- EEBC is unable to meet need arising from outside its administrative boundaries.
- RBBC consider that meeting its own future need will be challenging.

Flood Risk

Surrey County Council is the Lead Local Flood Authority (LLFA) for both authorities.

¹ Planning Policy for Travellers December 2023

Within EEBC, the main cause of flood risk in the Borough is from surface water flooding. EEBC's Proposed Submission Local Plan has been informed by the [Level 1 and Level 2 Strategic Flood Risk Assessment](#) (SFRA) 2024.

RBBC is currently undertaking a new SFRA to inform the emerging Local Plan.

Both parties agree that:

- Up to date SFRA's have/will inform their respective Local Plan policies.

Transport & Highways

None of the allocations within the Proposed Submission Local Plan adjoin RBBC or are of a scale (individually or cumulatively) to negatively impact on RBBC's highway infrastructure.

Both parties agree that:

- Information relating to transport studies/schemes will continue to be shared, where relevant.

Education

There are linkages between EEBC and RBBC in terms of education infrastructure and 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.

Surrey County Council has provided both EEBC with bespoke forecasts to identify the primary and secondary pupil place growth arising from the Proposed Submission Local Plan. These forecasts identify that there is sufficient capacity within the existing school estate to accommodate the pupil growth.

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 RBBC 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.

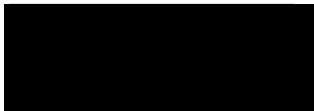
Both parties agree that:

- 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.

5) Signatories



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



Head of Planning and Regulatory Services
Reigate & Banstead Borough Council
6 February 2025

Planning

Reigate & Banstead Borough Council,
Town Hall,
Castlefield Road,
Reigate
RH2 0SH

[REDACTED]
Epsom & Ewell Borough Council

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

Ref: EEBC LP Reg 19 RBBC Feb 25

5-Feb-25

Dear [REDACTED]

Epsom & Ewell Borough Council Regulation 19 Local Plan Consultation

Thank you for providing Reigate & Banstead Borough Council (RBBC) the opportunity to respond to your Regulation 19 new local plan consultation. We understand that we need to consider if the plan is legally compliant and that it meets the tests of soundness and if we consider the plan needs amending, this representation should set out the necessary evidence to support any proposed changes.

Duty to Co-operate

As a neighbouring authority, I can confirm that RBBC have had meaningful discussions with Epsom and Ewell Borough Council (EEBC) in the preparation of this local plan in accordance with Section 33A of the Planning & Compulsory Purchase Act 2024 (as amended), that we have responded to a number of technical studies including the Green Belt methodology, the Statement of Community Involvement, the Regulation 18 consultations and that a Statement of Common Ground between Epsom and Ewell and Reigate & Banstead borough councils will be submitted to the Examination.

Tests of Soundness

Positively prepared

We note that this plan has been prepared in accordance with the transitional arrangements and that the December 2024 housing needs standard methodology does not apply in such cases. We note that the EEBC is attempting to meet as much of its local housing need (Policy S1) and would be releasing some metropolitan

greenbelt sites to help deliver additional housing. While these releases would not meet the full need, it is important that separation is maintained between existing settlements including those in the northwest of Reigate & Banstead at Tattenham Corner, Tadworth, Nork and Burgh Heath. However, it should be mentioned that greenbelt, flood risk, the Surrey Hills National Landscape, and other constraints mean that Reigate and Banstead will find it particularly challenging to meet its own 2024 Standard Methodology housing need of 1,306 units per annum in its emerging local plan let alone other unmet need.

In terms of Gypsy and Traveller accommodation (Policy S1) we note that the plan includes a shortfall with regards future pitch provision but that Policy S8 includes a criteria based approach to new sites. Reigate & Banstead currently maintains a five year's supply of traveller pitches based on a 2017/8 study prepared to inform the Development Management Plan (adopted 2019, reviewed 2024). A new assessment has recently commenced to inform the emerging RBBC plan. It is likely to be challenging for RBBC to meet its own future need let alone need from outside the borough.

We support the inclusion of Policy S3 – Climate Change and Mitigation. We are pleased that the emerging Surrey County Council Net Zero Toolkit which RBBC has been involved in its preparation has been included by EEBC.

With regard to the site allocation policies, this work appears to have been undertaken in a transparent and thorough way. Most road impacts can be addressed around the proposal sites though there is some additional trips on and around the M25. None of the proposal sites adjoin RBBC or of a scale (individually or cumulatively) to negatively impact RBBC infrastructure.

With regards to Policy S10 Retail hierarchy and network, RBBC wishes to raise no concerns as this approach appears appropriate. Moreover, the Reigate & Banstead Retail and Leisure Study 2024 does not raise any issues that would impact on EEBC's Reg 19 Plan retail and leisure policies.

Effective

In terms of cross strategic matters RBBC will continue to work with EEBC as to be shown in the forthcoming Statement of Common Ground between the two authorities.

Justified

We note that the Council has prepared an extensive evidence base including a Sustainability Appraisal, Interim Habitats Regulations Assessment and Equalities Impact Assessment and technical studies to support its emerging plan. We also note

that the plan has been subject to extensive engagement and consultation events. We therefore consider that this plan can be justified.

Consistent with National Policy

RBBC consider that the proposed plan is broadly consistent with national policy at the time of preparation.

Conclusion

It is considered that the plan provides a clear direction for Epsom and Ewell and as a result of the deliberations above, RBBC does not object to the submission of the EBC Local Plan for Examination.

Kind regards,



Andrew Benson

Head of Planning and Regulatory Services

Email 

LDF@reigate-banstead.gov.uk