

# Statement of Common Ground with the London Borough of Sutton

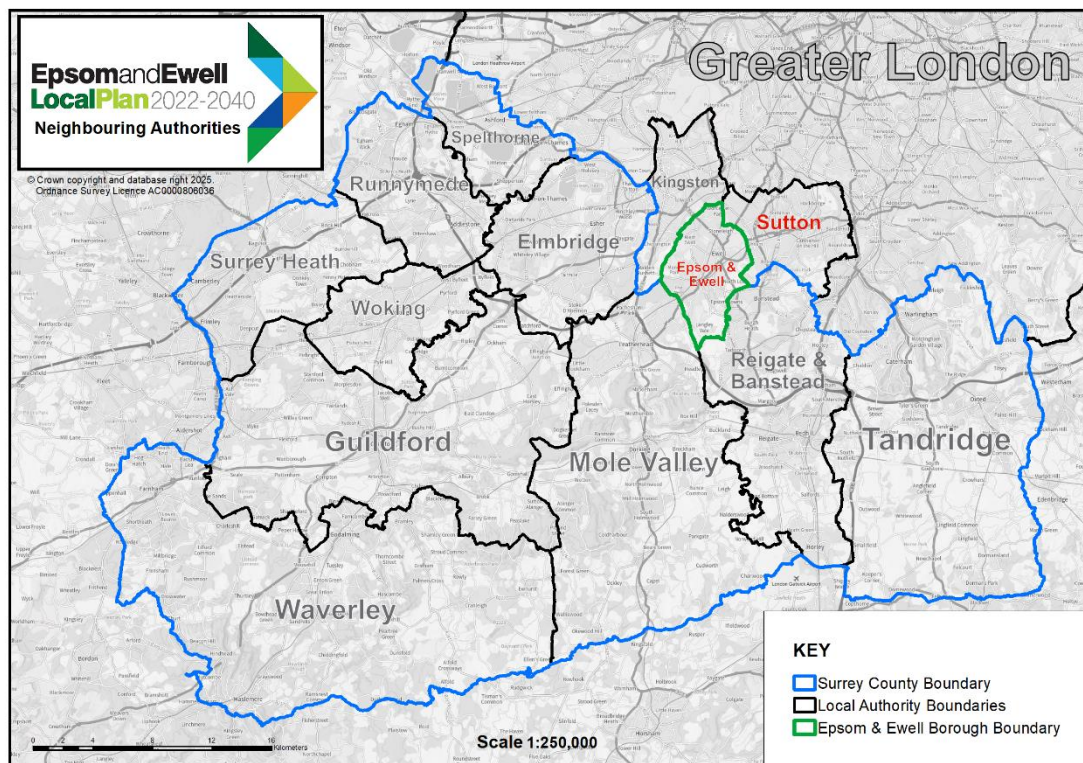
This SoCG is between Epsom & Ewell Borough Council (EEBC) and the London Borough of Sutton (LBS) in relation to the Epsom & Ewell Local Plan 2040.

## 1) Constituent parties to this SOCG

Epsom & Ewell Borough Council (EEBC)  
London Borough of Sutton (LBS)

## 2) Geographical area covered by this SOCG

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



EEBC and LBS share a boundary with LBS being situated to the northeast of EEBC. EEBC is located within the Surrey County Council administrative area, while the wider strategic direction for LBS is provided by the Greater London Authority (GLA).

There are significant physical linkages between the authorities. The A24 and A232 are the main roads connecting the boroughs, while rail routes lead into

central London, out to Surrey and beyond. Both areas have Green Belt designations, with LBS also having areas designated as Metropolitan Open Land. EEBC has more extensive tracts of open space to the south of the borough, while Nonsuch Park is jointly managed by the two authorities. Both authorities have industrial estates which are important to the local economy and the central London job market is within commuting distance. Each authority is served by a main town centre (Epsom and Sutton) and numerous smaller district and local/neighbourhood centres. Health and education functions also cross boundaries.

### **3) Duty to Cooperate**

EEBC and the LBS 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 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.

EEBC invited representations on the Proposed Submission Local Plan (Regulation 19) between 20 December and 5 February 2025.

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 the LBS 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.

The London Plan (2021) sets an annualised average housing target for the LBS of 469 new homes per year. LBS consulted upon a Regulation 18 consultation from July to September 2024. Under the standard method (post the 12 December 2024 National Planning Practice Guidance update) the annual housing need figure rises to 1,654. As such, further work is required before LBS can set out its draft housing requirements figure.

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.
- LBS are gathering further evidence to identify capacity for new dwellings. 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 policy<sup>1</sup>. When its evidence indicated it would be difficult to meet this need within the borough, EEBC sought assistance from its Duty to Cooperate partners.

LBS's need for additional pitches has been calculated by the Greater London Authority (GLA), which identified a need for an additional 15 pitches, in addition to an additional eight pitches which are already under construction.

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 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.
- LBS have an identified need for an additional 15 pitches, which is anticipated to be met within the borough.
- Both authorities are unable to meet needs arising from outside their own administrative boundaries.

## **Flood Risk**

Believe both authorities consider surface water flooding to pose the greatest risk within their administrative boundaries.

EEBC's Proposed Submission Local Plan has been informed by the [Level 1 and Level 2 Strategic Flood Risk Assessment](#) (SFRA) 2024.

LBS published an updated Level 1 SFRA in 2024 and intend to undertake a Level 2 SFRA in 2025.

---

<sup>1</sup> Planning Policy for Travellers December 2023

Both parties agree that:

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

## **Transport & Highways**

Surrey County Council is the highways authority for Epsom and Ewell. Transport for London (TfL) is the integrated transport authority responsible for the implementation of the Mayor's Transport Strategy (2018). LBS is required to work with TfL to support the implementation of the Mayor's Transport Strategy. TfL runs the day-to-day operation of London's public transport network (including London Buses, London Underground and Overground, Docklands Light Railway, TfL Rail and London Trams). The borough of Epsom & Ewell benefits from numerous TfL bus routes, which mainly serve the northern parts of the borough.

Both parties agree that:

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

## **Education**

There are linkages between EEBC and LBS in terms of education infrastructure. EEBC works 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 EEBC with bespoke forecasts to identify the primary and secondary pupil place growth arising from the Proposed Submission Local Plan. The forecasts identify that there is sufficient capacity within the existing school estate to accommodate the pupil growth.

LBS has seen a reduction in demand for school places due to the decline in birth rates. There is a greater need for SEND provision.

Both parties agree that:

- Both authorities will continue to monitor school place provision against need to ensure there is sufficient capacity.

## **Healthcare**

There are linkages between EEBC and LBS in terms of healthcare infrastructure. The Borough of Epsom & Ewell is within the NHS Surrey

Heartlands Integrated Care Board area, while LBS is within the NHS Southwest London 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.

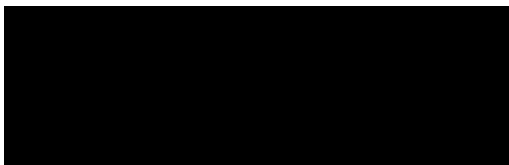
LBS identified a number of potential sites in the Local Plan Regulation 18 consultation that have potential to deliver additional/enhanced healthcare provision.

Both parties agree that:

- Both authorities will continue to liaise with their ICB to ensure healthcare infrastructure needs continue to be met.

## **5) Signatories**

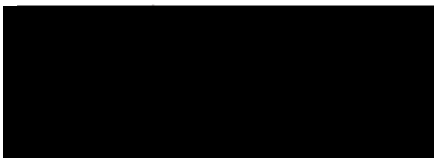
Epsom & Ewell Borough Council



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

Date: 7<sup>th</sup> March 2025

London Borough of Sutton



Dean James: Planning Policy Manager

Date: 5<sup>th</sup> March 2025

### **Epsom and Ewell Local Plan - Regulation 19**

#### **Response from London Borough of Sutton 5th February 2025**

##### **Housing**

LB Sutton notes that Epsom and Ewell Borough Council's (EEBC) Proposed Submission Local Plan (Policy SA1 - Spatial Strategy) sets a housing requirement figure of 261 new homes per year or 4,700 between 2022 and 2040. It is also noted that this equates to approximately 46% of need identified through the standard method (pre-12 December 2024 National Planning Practice Guidance update).

LB Sutton carried out its Issues and Preferred Options consultation from July 2024 and is currently working towards a Regulation 19 consultation later in 2025. As such, further work is required before LB Sutton can set out its draft housing requirements figure. However, its current standard method figure (post December 2024 NPPF) is 1,654 homes per year. This is compared to a current housing target (set in the London Plan 2021) of 469 new homes per year, or 28% of the standard method.

Given the difference between Sutton's current housing requirement figure and the new standard method figure, and as discussed through Duty to Cooperate meetings, Sutton is unable to take any of EEBC's unmet housing need.

LB Sutton will continue to engage with EEBC as the Sutton Proposed Submission draft continues to emerge through 2025.

##### **Employment and Industry**

###### **Policy DM7 – Employment Land**

LB Sutton notes the policy approach set out in DM7, which is to continue to support and protect the status of Kiln Lane and Longmead Industrial Estates as the two largest employment sites in the borough, and to identify these locations as strategic employment sites to meet future needs for employment floorspace over the Local Plan Period.

LB Sutton notes E&E's identified employment need figure of 56,169 sq.m., as set out in Table 99 of the E&E Housing and Economic Development Needs Assessment (2023). LB Sutton's own Employment Land and Economic Needs Assessment (May 2023) identifies an economic need figure of 167,000 sq.m. to 2042.

It is LB Sutton's current position, initially tested through the Regulation 18 consultation in July 2024, that it will be extremely difficult to meet our own identified economic development needs within the borough. And, as such, LB Sutton is unable to accommodate any of EEBC's unmet needs for employment, industry, or economic activity.



### **Gypsy and Travellers**

LB Sutton notes the EEBC has identified a need for an additional 18 pitches over the local plan period (Policy S8), which reflects the December 2023 revised definition that is set out in national policy. LB Sutton also notes that EEBC is seeking to meet a proportion of its identified need through the allocation of 10 pitches within the Proposed Submission Local Plan but still has an unmet need for 8 additional pitches.

LB Sutton's Issues and Preferred Options document (2024) identified a need for 15 pitches and is seeking to meet this need within the borough (in addition to the 8 new pitches that are currently under construction). Whilst this work is ongoing, emerging findings indicative it is unlikely that Sutton would have surplus capacity to meet any unmet need from neighbouring boroughs

### **Green Belt**

LB Sutton and EEBC share a cross boundary green belt, which Sutton's latest Green Belt Review concluding that this land (within Sutton) should not be released. It is understood that EEBC are promoting the release of some green belt land but that none of this is located on Sutton's boundary.

In light of the new NPPF (December 2024) Sutton will be carrying out another Green Belt Review to take account of the new rules, namely grey belt, and will keep EEBC informed as this work emerges.

### **Transport and Infrastructure**

#### **Chapter 8 - Policy S17 – Infrastructure Delivery**

LB Sutton is supportive of the strategic policy approach set out in Policy S17 and its relationship with EEBC's published Infrastructure Delivery Plan (November 2024). We also note policies DM19 - DM 21 in that they relate to specific infrastructure topics. LB Sutton considers the infrastructure topics that have the most pressing cross-boundary impacts are health and education; and has reviewed the analysis and findings set out in Section 4.3 and Section 4.4 of the Infrastructure Delivery Plan (November 2024) relating to the planned and funded future provision within E&E. On these two infrastructure topics, LB Sutton confirms that it will be meeting its own identified infrastructure needs within the borough; but that based upon current analysis, we will be unable to meet any of EEBC's identified needs.

LB Sutton is supportive of the strategic policy approach set out in Policy S19 - Transport, and welcomes the opportunity to continue to liaise with both EEBC and Surrey County Council (as Highway Authority) to ensure that the cross boundary transport matters, such as road and rail connectivity, are discussed and resolved.