

Statement of Common Ground

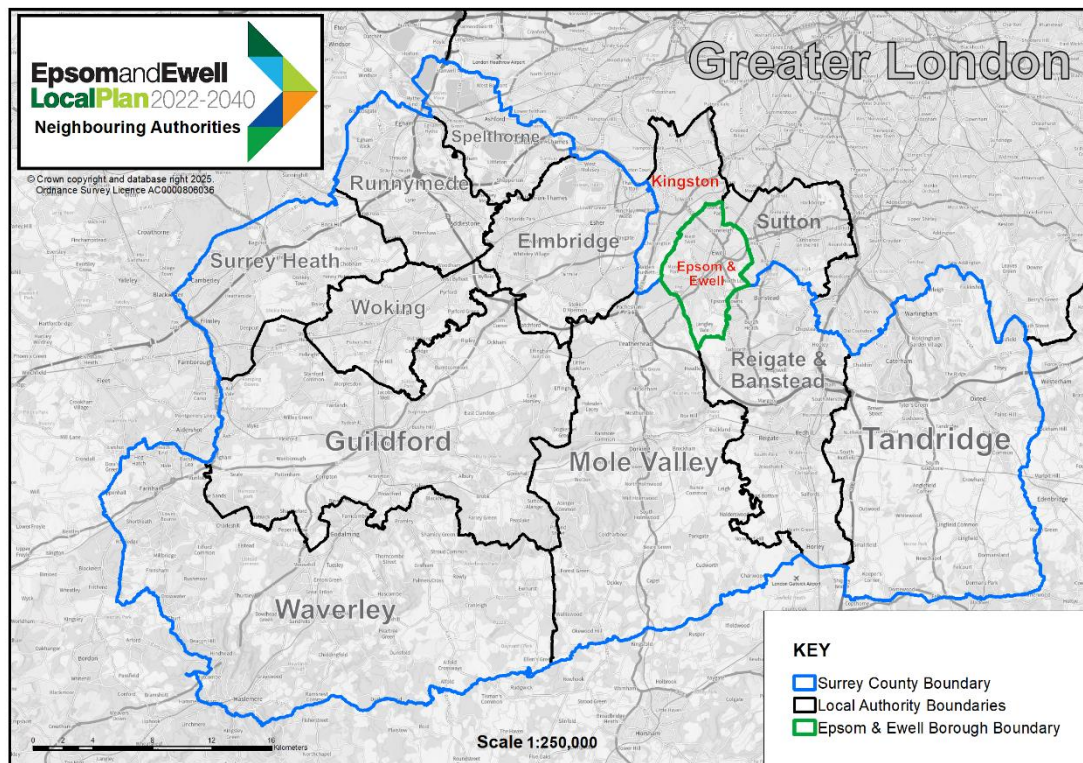
This Statement of Common Ground (SoCG) is between Epsom & Ewell Borough Council (EEBC) and Royal Borough of Kingston Upon Thames (RBK) in relation to the Epsom & Ewell Local Plan 2040.

1) Constituent parties to this SOCG

Epsom & Ewell Borough Council (EEBC)
Royal Borough of Kingston Upon Thames (RBK)

2) Geographical area covered by this SOCG

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



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

Both are located within the same Housing Market Area along with Elmbridge Borough Council and Mole Valley District Council. There are significant physical linkages between the authorities. The A240 and the B280 are the

primary road routes, while there are a number of bus routes connecting the boroughs. Each authority is served by a main town centre (Epsom and Kingston) and numerous smaller district and local/neighbourhood centres. Health and education functions also cross boundaries. Both authorities have areas designated as Green Belt, with RBK also having areas designated as Metropolitan Open Land.

3) Duty to Cooperate

EEBC and RBK 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 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.

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 RBK 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 RBK of 964 new homes per year. The most recent Regulation 18 Local Plan consultation (Nov 2022 to Feb 2023) committed to meeting this target. Under the standard method (post the 12 December 2024 National planning Practice Guidance) the housing need figure for RBK is 1,589 new homes per year.

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.

- RBK is currently reviewing its housing land supply evidence as part of the London Strategic Housing Land Availability Assessment. It is unlikely that RBK will be able to fully meet its Local Housing Need figure or the London Plan target.

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. RBK confirmed they were unable to assist through a formal response in July 2024 and through a subsequent Duty to Cooperate meeting.

RBK's Gypsy and Traveller Accommodation Assessment (2018) identifies a need for an additional 44 pitches. Currently, RBK has one public site with 18 pitches and one private site with 1 pitch, along with several unauthorised sites. RBK acknowledges that addressing the additional demand for pitches will be challenging due to constraints within the borough.

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.
- RBK's identified need is for an additional 44 pitches. It is anticipated this will be challenging to meet this need.
- Both authorities are unable to meet needs arising from outside their own administrative boundaries.

Flood Risk

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

RBK is the LLFA for the borough. The Level 1 and Level 2 SFRA was completed in September/October 2024.

¹ 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). RBK 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.

Within RBK, the Hook junction is a key public transport corridor, which is already significantly congested and close to the boundary of EEBC. RBK raised concerns in response to EEBC's Regulation 18 Draft Local plan consultation in relation to some of the proposed allocation sites, which are within reasonable proximity to the RBK borough boundary and the Hook junction. The concern is that the development of these sites, will add pressure to the local road network, through the high likelihood of car dependency. EEBC has shared with RBK the Strategic Highways Modelling Assessment Report (2024) that identifies the impacts of the Proposed Submission Local Plan on the highway network to assist in identifying the potential impact at this location.

Both parties agree that:

- Information relating to transport studies/schemes will continue to be shared, where relevant.
- EEBC and RBK will continue to work together to identify any mitigation that may be required to address the impact of growth.

Education

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.

Both parties agree that:

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

Healthcare

The Borough of Epsom & Ewell is within the NHS Surrey Heartlands Integrated Care Board area, while RBK 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.

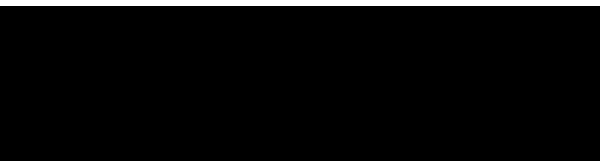
Both parties agree that:

- Both authorities will continue to liaise with their 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
Date: 5 March 2025



Councillor Ian Manders
Portfolio Holder for Climate Action, Biodiversity and Planning Policy
Royal Borough of Kingston Upon Thames
Date: 3 March 2025

Appendix 1: RBK Regulation 19 Representation

**Executive Director of Place
Matthew Essex**

4th February 2025



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KT1 1EU

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RBK website: www.kingston.gov.uk

Dear Sir/Madam

Thank you for the opportunity to submit comments to the Epsom & Ewell Borough Council Draft Local Plan Regulation 19 Consultation at this late stage.

At this time, we do not have any comments or concerns regarding the draft document. However, we remain committed to ongoing collaboration and engagement on matters related to the Duty to Cooperate (DtC) and other relevant issues.

Please do not hesitate to reach out if further input or clarification is required.

Yours sincerely,



Hannah Harris
Lead Officer for Planning Policy