

## Statement of Common Ground

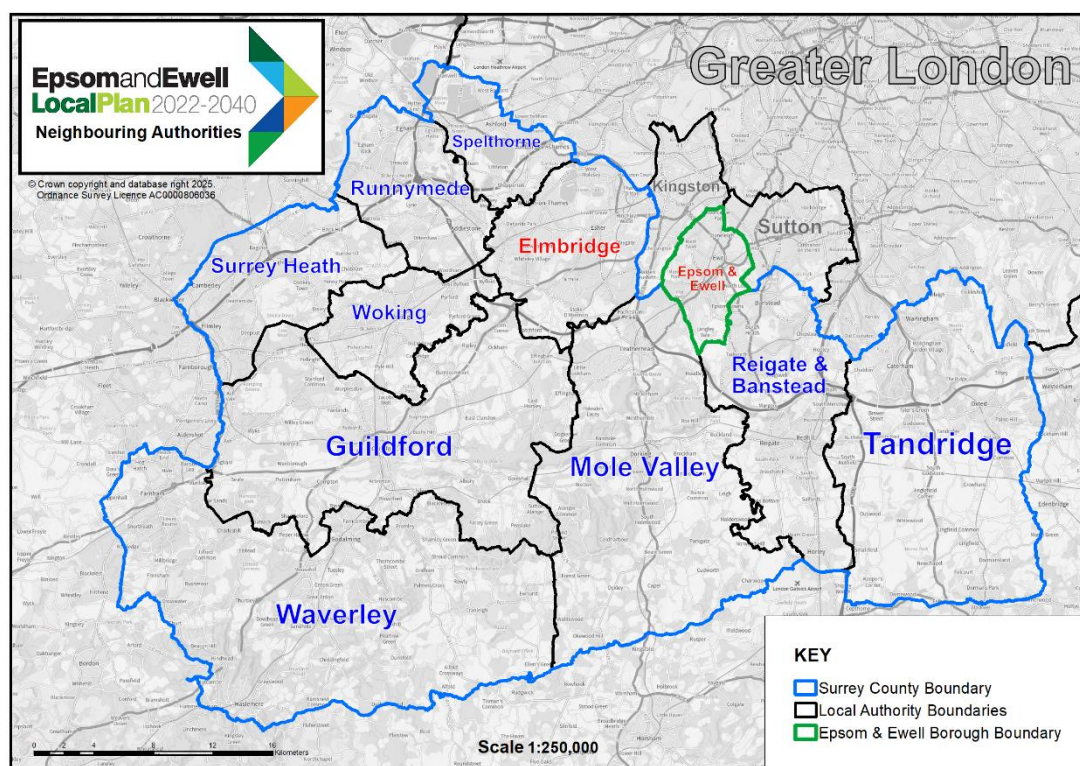
This Statement of Common Ground (SoCG) is between Epsom & Ewell Borough Council (EEBC) and Elmbridge Borough Council (EBC) in relation to the Epsom & Ewell Local Plan 2040.

### 1) Constituent parties to this SOCG

Epsom & Ewell Borough Council (EEBC)  
Elmbridge Borough Council (EBC)

### 2) Geographical area covered by this SOCG

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



EEBC and EBC are within the Surrey County Council administrative area and are both located within the same Housing Market Area (HMA). They do not share an administrative boundary, being physically separated by the Royal borough of Kingston Upon Thames. Both areas are similarly influenced by London in terms of the economy and overspill. In terms of planning, both authorities have extensive areas designated as Green Belt and both have areas of common land and heritage assets which constrain development.

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

EEBC and EBC 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.

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 EBC 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.

EBC will be commencing work on a new Local Plan following the withdrawal of the Elmbridge Local Plan (June 2022) from examination on 26 February 2025. EBC and EEBC signed a Statement of Common Ground (July/August 2023) prior to the submission of EBC's Local Plan in August 2023. The standard method (post the 12 December 2024 National Planning Practice Guidance update) identifies an annual housing need for EBC of 1,562 new homes per year.

The EBC/EEBC Statement of Common Ground (2023) established that neither authority at that time was able to accommodate each other's unmet housing needs. This position has been reconfirmed on subsequent occasions through a formal request for assistance from EEBC (November 2022); EBC's formal response to the Regulation 18 consultation, and through Duty to Cooperate meetings. In EBC's formal response to the Regulation 19 consultation EBC have stated that they are unlikely to be able to meet any of EEBC's unmet need through their new Local Plan process.

Both parties agree that:

- EEBC are unable to meet their housing need in full, as identified through the standard method, and are therefore unable to assist with meeting EBC's needs.

- EBC are commencing work on a new Local Plan and are unlikely to be able to meet their housing need in full. EBC are therefore unlikely to be able to meet any unmet need from EEBC.

### **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.

EBC confirmed they were unable to assist in response to a formal request from EEBC in November 2022. The EEBC Proposed Submission Local Plan contains an allocation for 10 Gypsy and Traveller pitches, leaving an unmet need of 8 pitches.

EBC will be updating their evidence in relation to Gypsy and Traveller accommodation needs.

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.
- EBC will be updating their evidence in relation to meeting Gypsy and Traveller accommodation needs.
- EEBC are unable to meet needs arising from outside their own administrative boundaries.
- Due to the uncertainty as to the level of need in EBC, EBC is unable to commit to meeting needs arising from outside of EBC.

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

## 5) Signatories



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

Epsom & Ewell Borough Council  
Date: 07/03/2025



Suzanne Parkes  
Head of Planning & Environmental Health

Elmbridge Borough Council  
Date: 05/03/2025

## Appendix 1: EBC Regulation 19 Representation



Civic Centre  
High Street, Esher  
Surrey KT10 9SD  
01372 474474  
contactus@elmbridge.gov.uk  
elmbridge.gov.uk

Sent via email

contact: Sarah Pharoah



Dear Susie,

### **Proposed Submission Epsom and Ewell Local Plan 2022-2040 (Regulation 19)**

Thank you for consulting Elmbridge Borough Council (EBC) on the Proposed Submission Epsom and Ewell Local Plan 2022-2040 (Regulation 19).

In responding to the draft Local Plan, the Council has focused its response on the Strategic Policies of the Plan that will and / or, are likely to have cross-boundary implications for our borough and have been the subject of our on-going collaboration under the Duty to Cooperate.

The Council also refers to the draft Statement of Common Ground (SoCG) which sets out the details of the current position regarding the Elmbridge Local Plan, our discussions on our shared Strategic Matters and those areas which are agreed and, subject to on-going collaboration.

### **Epsom and Ewell Local Plan 2022-2040 (Regulation 19)**

#### **Policy S1 - Spatial Strategy**

Although EBC and Epsom and Ewell Borough Council (EEBC) do not share an administrative boundary, both our authorities are located within the Kingston and North East Surrey Housing Market Area (HMA) and the issue of how we meet our local housing need is therefore a clear cross-boundary Strategic Matter which has been the focus of collaborative working on our respective evidence base documents and in the preparation of our Local Plans.

EBC notes that it is the intention of EEBC to submit a draft plan that seeks to deliver 4,916 homes, that represents 48% of the Borough's Local Housing Need, calculated



using the National Planning Policy Framework (NPPF) 2023 Standard Method, through development on brownfield land and the release of Green Belt land on five sites.

In considering EEBC's approach, EBC acknowledges that all authorities must assess their housing land supply according to their own individual context including the character and identity of existing settlements and how this can play an important role in the approach to densification and intensification.

EBC acknowledge that as EEBC is not meeting its own local housing need in full, it is highly unlikely that it will be able to assist in meeting any of EBC's unmet housing need that may arise in the future. Given EBC's latest and emerging evidence of housing land supply, it is similarly unlikely that EBC would be able to assist EEBC in meeting their unmet housing need.

EBC has previously raised a concern about the consideration of the setting and special character of 'historic towns' within EEBC's Green Belt review methodology and the implication this has on the assessment of Green Belt. EEBC have since confirmed that they took this comment into account and when preparing their Green Belt Study Update 2024, modified the methodology of the original study and the scores for the parcels for purpose 4 'preserve the setting and special character of historic towns' were not taken forward. As such, EBC consider this matter to be resolved.

#### Policy S19 - Transport

Whilst not adjoining boroughs, there is vehicular movement between the two boroughs via the A243, Rushett Lane and Fair Oak Lane junction that is located within the Royal Borough of Kingston upon Thames. EBC note that EEBC's Strategic Transport Model Assessment Report (October 2024) prepared in support of the draft Local Plan identifies an increase in vehicle movement exiting the borough in the AM peak at the Rushett Lane junction as the result of the proposed strategy.

Elmbridge note EEBC's conclusion that these impacts would not be considered severe in terms of the National Planning Policy Framework (NPPF). EBC would support the need for mitigation to reduce the impact of the Local Plan through the ambitions of the Local Transport Plan 4 (LTP4) for Surrey and the Epsom and Ewell Local Cycling and Walking Infrastructure Plan (LCWIP), both of which are noted as key documents within Policy S19.

#### Policy S3 – Climate Change and Mitigation

EBC welcome the increased emphasis on the Climate Emergency in EEBC's draft Plan and with the need to address the causes of and mitigate and adapt the impacts of climate change.

EBC support the inclusion of the need to support action on climate change in the strategic objectives of the draft Plan and the identification of combatting climate change as a Strategic Policy (Policy S3). Following through to the more detailed

Development Management Policies, including Policy DM10: Building Emissions Standards and DM11: Sustainable Water Use, it is clear how EEBC intend to deliver this strategic objective and policy.

**On-going collaboration**

EBC are committed to continued collaboration with EEBC, sharing information and best practice and continuing to procure evidence jointly, where appropriate, throughout the plan preparation phase and beyond.

Yours sincerely,

A solid black rectangular box used to redact the signature of the councillor.

Councillor Caroline James  
Portfolio Holder for Planning