
Shaping Elmbridge A New Local Plan



Duty to Cooperate Statement of Compliance

June 2022



Elmbridge
Borough Council
... bridging the communities ...

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Executive Summary

In order to address strategic issues relevant to their area, the Localism Act 2011¹ places a statutory duty (the 'duty to cooperate') on and requires local planning authorities to work constructively with the neighbouring authorities and other prescribed bodies in preparing their development plan documents.

Strategic issues are policies and site allocations which address strategic priorities. For example, policies that set out the overall strategy for the pattern, scale and quality of development and make sufficient provision for development such as housing; employment; and retail. Strategic issues are also those that address the issues of infrastructure e.g. highways; community infrastructure; and conservation and enhancement of the natural, built and historic environment.

A local planning authority must demonstrate how it has complied with the duty at the independent examination of its local plan and will need to satisfy the Planning Inspector that cooperation has been on-going and produced effective and deliverable policies on strategic cross boundary matters.

As part of its Local Plan preparation, the council has identified 14 strategic issues ('Strategic Matters'):

- Strategic Matter 1: Housing (including Affordable Housing)
- Strategic Matter 2: Roma, Gypsies, Travellers and Travelling Showpeople (Travellers) and Houseboats
- Strategic Matter 3: Employment, Retail & Other Commercial Development
- Strategic Matter 4: Transport
- Strategic Matter 5: Flooding
- Strategic Matter 6: Minerals, Waste & Other Utilities
- Strategic Matter 7: Health
- Strategic Matter 8: Education
- Strategic Matter 9: Green & Blue Infrastructure
- Strategic Matter 10: Green Belt & Landscape
- Strategic Matter 11: Natural Environment including Thames Basin Heaths Special Protection Area
- Strategic Matter 12: Climate Change
- Strategic Matter 13: Historic Environment
- Strategic Matter 14: Heathrow

This Statement of Compliance demonstrates how Elmbridge Borough Council has met the duty to co-operate in the Elmbridge Borough Local Plan 2022-2037 setting out engagement activities under each of the above Strategic Matters. It outlines the ways in which the council has engaged effectively with representatives of other duty to cooperate bodies that are

¹ Localism Act 2011, Part 6 Chapter 1 Section 110 – duty to cooperate in relation to planning of sustainable development - <http://www.legislation.gov.uk/ukpga/2011/20/section/110/enacted>

prescribed in the relevant legislation, as well as the ways in which the outcomes of the cooperation have informed the direction of the policies in the draft Local Plan.

This Statement records activities undertaken as part of the preparation of the new Elmbridge Local Plan up until the Regulation 19 Stage (June 2022). Prior to the submission of the draft Local Plan and other supporting documentation to the Planning Inspector for the Examination in Public (EiP), the council will prepare a Supplementary Statement that sets out activities undertaken between June 2022 and the submission of the draft Local Plan (expected Autumn 2022). This will also include updates on any new issues arising and issued resolved.

The council will enter into a number of Statements of Common Grounds (SoCGs) with authorities and other duty to co-operate partners following the Regulation 19 (publication of a local plan) of the Town and Country Planning (Local Planning) (England) Regulations 2012. All Statements will be agreed and appended to the Supplementary Statement prior to the submission of the draft Local Plan for Examination.

1. Introduction

The Duty to Cooperate Statement of Compliance

- 1.1 In order to address strategic issues relevant to their area, the Localism Act 2011² places a statutory duty (the 'duty to cooperate') on and requires local planning authorities to work constructively with the neighbouring authorities and other prescribed bodies in preparing their development plan documents. This is reinforced in National Planning Policy Framework (NPPF) 2021 (paragraphs 24 -27) which set out what is expected of local planning authorities in working collaboratively with other bodies to ensure proper coordination of activity on cross-boundary strategic matters.
- 1.2 The duty to cooperate is not a duty to agree, but local planning authorities should make every effort to secure the necessary cooperation on strategic cross-boundary matters before submitting their Local Plans for examination. At examination, local planning authorities must demonstrate how they have complied with the duty. If a local planning authority cannot demonstrate that it has been complied with, then the Local Plan will not be able to proceed further in the examination process.
- 1.3 The purpose of this Statement, therefore, is to set out how Elmbridge Borough Council (hereafter referred to as 'the council') has discharged its duty in relation to the preparation of Elmbridge Local Plan. It identifies the strategic and key issues to be addressed and on which the council has sought to work collaboratively with other planning authorities and organisations throughout the preparation of the draft Local Plan up until the point of Submission.
- 1.4 The structure of this Statement has broadly followed the Planning Advisory Service (PAS)³ guidance in its preparation setting out:
- Section 2 - Legislative, national and local policy context for the duty to cooperate.
 - Section 3 - An overview of the strategic context and geography of Elmbridge Borough.
 - Section 4 - The relevant strategic priorities / matters and cross boundary issues that the council needs to address alongside its duty-to-cooperate geographies and partners.
 - Section 5 - The existing mechanism and collaborative working with prescribed bodies and other key stakeholders that is already taken place and the groups that have been utilised to help prepare the draft Local Plan.

² Localism Act 2011, Part 6 Chapter 1 Section 110 – duty to cooperate in relation to planning of sustainable development - <http://www.legislation.gov.uk/ukpga/2011/20/section/110/enacted>

³ Local Government Association – Planning Advisory Service (PAS) - <https://www.local.gov.uk/pas/pas-topics/local-plans/are-you-ready-do-your-duty-and-cooperate>

- Section 6 - How the council has discharged the duty in regard to each strategic matter including the identification of any outstanding strategic issues that the council and its partners are working to address.
 - Section 7 - The conclusion of the council's duty to cooperate engagement.
- 1.5 Throughout this Statement a number of appendices are referred to. This has been presented as a separate document due to the combined size of this Statement of the information presented in the appendices. The appendices are also available to view on the council's [website](#).
- 1.6 This Statement records activities undertaken as part of the preparation of the new Elmbridge Local Plan up until the Regulation 19 Stage (June 2022). Prior to the submission of the draft Local Plan and other supporting documentation to the Planning Inspector for the Examination in Public (EiP), the council will prepare a Supplementary Statement that sets out activities undertaken between June 2022 and the submission of the draft Local Plan (expected Autumn 2022). This will also include updates on any new issues arising and issued resolved.
- 1.7 This Statement forms part of the supporting documentation for the draft Local Plan and should be read alongside the plan and other supporting documents including the Local Plan evidence base. This includes the Consultation Statement(s), which set out how the council has consulted other relevant bodies, and the local community, during the preparation of the Local Plan.

Statements of Common Ground

- 1.8 The council will seek to update existing Statements of Common Ground (SoCGs) and enter into new SoCGs with other Local Planning Authorities and other duty to co-operate partners following the Regulation 19 (publication of a local plan) of the Town and Country Planning (Local Planning) (England) Regulations 2012. All Statements will be agreed and appended to the Supplementary Statement prior to the submission of the draft Local Plan for Examination. This is scheduled for Autumn 2022. It is intended to prepare SoCGs with the following:
- Epsom & Ewell Borough Council
 - Mole Valley District Council
 - Royal Borough of Kingston upon Thames
 - Runnymede Borough Council
 - Spelthorne Borough Council
 - Guildford Borough Council
 - Woking Borough Council
 - London Borough of Richmond upon Thames
 - Surrey County Council
 - Greater London Authority (GLA) / Transport for London (TfL)
 - Environment Agency
 - Natural England

- National Highways
- Historic England
- Surrey Heartlands Health and Care Partnership Integrated Care System (ICS)

2. Legislative & Policy Context

Legislative Framework

- 2.1 The 'duty to cooperate' (the duty) was introduced by the Localism Act in November 2011. The Act inserted a new Section 33A into the Planning and Compulsory Purchase Act 2004. This placed a legal duty on all local authorities and public bodies (defined in regulations) to 'engage constructively, actively and on an ongoing basis' to maximise the effectiveness within which certain activities are undertaken as far as they relate to a 'strategic matter'.
- 2.2 Paragraph 33A of the Planning and Compulsory Purchase Act (as amended) states that 'certain activities' include:
- the preparation of development plan documents;
 - the preparation of other local development documents; and
 - activities that can reasonably be considered to prepare the way for the preparation of the above two points.
- 2.3 For the purpose of duty, the Act defines 'strategic matters' as:
- Sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas; and
 - Sustainable development or use of land in a two-tier area if the development or use is a county matter, or would have a significant impact on a county matter.
- 2.4 The duty requires that councils set out planning policies to address such strategic matters and consider whether to enter into joint approaches to plan-making.
- 2.5 The Act extends the purposes of the independent examination of a local plan to include determination as to whether the duty has been complied with⁴. At examination, the Inspector will assess whether the duty has been met as, any failure in this regard cannot be rectified after the plan has been submitted for examination. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the plan.

⁴ Through inclusion of Section 20(5)(c) into the Planning and Compulsory Purchase Act 2004

National Context

National Planning Policy Framework

- 2.6 The National Planning Policy Framework (NPPF) 2021 reinforces the Localism Act and sets out (paragraphs 24 -27) what is expected of local planning authorities in working collaboratively with other bodies to ensure proper coordination of activity on cross-boundary strategic matters.
- 2.7 As referenced in the NPPF (paragraph 20), strategic matters are policies and site allocations which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning & Compulsory Purchase Act 2004. Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:
- a) Housing (including affordable housing), employment and retail, leisure and other commercial development;
 - b) Infrastructure for transport; telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - c) Community facilities (such as health, education and cultural infrastructure); and
 - d) Conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure, and planning measures to address climate change mitigation and adaption.
- 2.8 Paragraph 25 of the NPPF states that strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans and that they should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers).
- 2.9 NPPF also states that effective on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- 2.10 To demonstrate effective and on-going joint working, the NPPF recommends that strategic policy-making authorities prepare and maintain one or more Statements of Common Ground (SoCGs), documenting cross-boundary strategic matters being addressed and progress in cooperating to address these. These are to be prepared using the approach set out in national planning guidance.

2.11 As part of a local plan examination, the Inspector will test whether a local planning authority has complied with duty. The duty is separate from, but related to, the tests of soundness. The tests of soundness, which are set out within the NPPF (paragraph 35), assess whether a local plan is:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

2.12 In identifying whether a Local Plan is 'effective', the Inspector will assess whether effective joint working has taken place in order to address cross-boundary issues and these have been dealt with rather than deferred, as evidenced by the SoCGs.

2.13 In addition to demonstrating that the plan has been prepared in accordance with the duty to cooperate, local authorities must also demonstrate how joint working has influenced policy outcomes within the plan in order for the plan to be found.

Planning Practice Guidance: Duty to Cooperate

2.14 The Government's Planning Policy Guidance (PPG) was launched in March 2014 with the intention of providing additional advice on how the policies of the NPPF are expected to be implemented / applied. PPG expands on the extent to which local planning authorities should cooperate.

2.15 In the 'Plan-making' Chapter and under the sub-heading 'Maintaining effective cooperation', PPG provides advice on the duty to cooperate and SoCGs.

2.16 Expanding on the term 'other public bodies' that are also subject to the duty, PPG confirms that these are as prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended. For the purpose of the duty, 'other public bodies' are:

- a) the Environment Agency
- b) the Historic Buildings and Monuments Commission for England (known as English Heritage)
- c) Natural England
- d) the Mayor of London
- e) the Civil Aviation Authority
- f) the Homes and Communities Agency
- g) each Primary Care Trust established under section 18 of the National Health Service Act 2006(2) or continued in existence by virtue of that section
- h) the Office of Rail Regulation
- i) Transport for London
- j) each Integrated Transport Authority
- k) each highway authority within the meaning of section 1 of the Highways Act 1980(6) (including the Secretary of State, where the Secretary of State is the

highways authority)

l) the Marine Management Organisation.

2.17 All parties should approach the duty in a proportionate way, tailoring cooperation according to where they can maximise the effectiveness of plans.

2.18 In addition to those prescribed bodies listed above, the council is also required to proactively engage with Local Enterprise Partnerships and Local Nature Partnerships. As set out in PPG (paragraph: 030 Reference ID: 61-030-20120315), they are not subject to the requirements of the duty but, local planning authorities and the public bodies that are subject to the duty, must cooperate with these Partnerships and have regard to their activities when they are preparing their Local Plans, so long as those activities are relevant to local plan making.

2.19 Advancing the need to actively engage with those that are not 'prescribed bodies' but, their activities have played a key role in shaping the Local Plan, the council has also engaged with several other organisations and bodies. This includes:

- Affinity Water
- British Telecommunications PLC / Open Reach
- Department for Education
- Education Funding Agency
- Gardens Trust / Surrey Gardens Trust
- Heathrow Strategic Planning Group (HSPG) (and by association other local authorities and LEPS, see Strategic Matter 14 in Section 6 for further details)
- Joint Strategic Partnership Board (JSPB) (and by association other local planning authorities and bodies, see Strategic Matter 11 in Section 6 for further details)
- Local Planning Authorities in the South East Region (see Strategic Matter 1 for full details)
- National Grid
- Network Rail
- Open Space Society
- Reigate & Banstead Borough Council
- Royal Borough of Windsor and Maidenhead
- Royal Society for Protection of Birds
- South Western Rail
- Southern Gas Networks
- Sport England
- SSE
- Surrey Ambulance Service (managed by South East Coast Ambulance Service)
- Surrey Fire & Rescue
- Surrey Futures Board
- Surrey Heath Borough Council
- Surrey Police
- Surrey Wildlife Trust
- Sutton & East Surrey Water

- Tandridge Borough Council
- Thames Landscape Partnership (and by association other local planning authorities and bodies, see Strategic Matter 10 in Section 4 for further details)
- Thames Water Utilities Ltd
- Transport for the South East
- UK Power Network
- Waverley Borough Council

2.20 Within Section 6 of this Statement, under each Strategic Matter, the council has set out those prescribed bodies (as set out in paragraph 2.16) and ‘other’ bodies (as set out in paragraph 2.19) that have been proactively engaged. Collectively, they have been referred to throughout Section 6 of this Statement as ‘Strategic Partners’. However, for the purpose of discharging the duty, SoCGs have been limited to relevant prescribed bodies as recorded in paragraph 1.8 of this Statement.

2.21 During the local plan examination, PPG makes clear that the Inspector will first assess whether a local planning authority has complied with the duty and other legal requirements using all available evidence. The Planning Inspectorate Procedure Guide for Local Plan Examinations, Updated 25 October 2021, states that in order to demonstrate compliance with the duty to co-operate, the most helpful approach is for local planning authorities to submit a statement of compliance with the duty. The statement of compliance should identify any relevant strategic matters and how they have been resolved – or if they have not, why not. It should detail who the local planning authority has co-operated with and on which strategic matter(s), the nature and timing of the co-operation, and the outcomes of the co-operation, including how it has influenced the plan. As part of this process, NPPF paragraph 27 advises that the LPA should prepare one or more statements of common ground with relevant bodies. The PPG on Plan-making contains guidance on preparing such statements.

2.22 If the Inspector finds that the duty and other legal requirements have been complied with, the examination will then test whether the local plan is sound.

Planning Practice Guidance: Statement of Common Ground

2.23 The NPPF sets out that strategic policy-making authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCGs), throughout the plan-making process. As set out in PPG, a SoCG is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is and is not happening throughout the plan-making process and, is a way of demonstrating at examination that plans are deliverable over the plan period and are based on effective joint working across local authority boundaries. In the case of local planning authorities, it also forms part of the evidence required to demonstrate that they have complied with the duty to cooperate.

2.24 PPG continues to provide advice to strategic policy-making authorities on SoCGs setting out information on:

- The scope - including the geographical area and strategic issues covered and how they have been addressed;
- When it is appropriate for plan-making authorities to prepare more than one SoCGs;
- What activities are expected to be documents in a SoCGs;
- When statements should be prepared and published;
- Whether an agreement is required on all strategic matters and what to do if an agreement cannot be reached; and
- Who should sign the SoCGs on behalf of the local planning authority.

2.25 PPG makes clear that the level of cooperation detailed in the statement is expected to be proportionate to the strategic matters being addressed. The statement is expected to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. However, the statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities' websites.

Local Context

The draft Local Plan

2.26 The draft Local Plan sets out how the communities and places of Elmbridge will develop over the next 15 years (up to 2037). It includes policies and site allocations to guide the development and use of land as well as defining the Green Belt and those areas that will be protected and enhanced for heritage or nature conservation purposes.

2.27 The draft Local Plan includes various parts that are to be read as a whole. This starts with a vision and five guiding principles (see Figures 1 and 2) setting out what the Plan is aiming to achieve. To deliver the vision and guiding principles, there is a suite of policies, land allocations and designations. These are divided into high-level policies called strategic policies which set the strategy for the Local Plan and provide the high-level values that development must adhere to. Then there are the detailed policies known as the Development Management policies. These provide the detailed design and technical criteria and standards which, proposed development will be assessed against.

2.28 As set out in Figure 3, the vision for the draft Local Plan and the guiding principles were informed by national planning policy and legislative requirements; the Local Plan Evidence Base; residents' and other stakeholders' views; other borough and county-

wide strategies⁵; and, the on-going engagement of our duty-to-cooperate partners.

2.29 The vision for the borough as well principles are all set within the context of and seek to address / capitalise on the challenges and opportunities for the borough which make up the spatial context for the Plan (as expanded on in Section 3 of this Statement). These challenges and issues as well as options for addressing them were explored in a series of early consultation documents prepared during the Plan's preparation (see Figure 4) and the council's 'How the Spatial Strategy was formed' paper for further details.

Figure 1: The Vision for the borough as set out in the draft Local Plan

By 2037, Elmbridge will be more resilient to the impacts of climate change. The council accepts its responsibility to make a resilient environment, to reduce carbon emissions and to deliver positive outcomes for future generations. The council will positively lead on a commitment to ensure every decision is made with the achievement of low carbon and net zero in mind, with delivering sustainable growth and the use of renewables as standard.

The council will renew, enhance and protect green and blue spaces across the borough, with better connectivity for the benefit of both people and wildlife. Residents will benefit from improved air quality, minimised noise, flood risk and other polluting impacts, and a reduction in carbon and water demands by minimising detrimental impacts from development.

Building on the success of our existing communities, the built environment will be well designed, beautiful and will offer high quality public realms, contributing to the uniqueness of each settlement.

Excellent design will safeguard the built, historic and natural environment for the health and wellbeing of existing residents and future generations.

Residents, existing and new, will have the choice of a range of housing types that meet their needs. Our town, district and local centres will act as social, arts and commercial hubs, nurturing communities and businesses and allowing our culture and economy to flourish. There will be high quality digital connectivity enabling flexibility in the evolving patterns of working.

Good growth will be supported by the delivery of the right infrastructure in the right place, at the right time. Innovative solutions will be used to improve transport interchanges, to manage the highway network for all users, and foster a shift in travel behaviour towards more people walking and cycling, particularly for short journeys.

2.30 Within the draft Local Plan, 'Good growth' is:

- Is proportionate and sustainable, focusing on the places where people both live and work.
- Supports overall improvements to the health and wellbeing of our residents.

⁵ Including sub-regional strategies such as those relating to Heathrow and transport.

- Is supported by the necessary infrastructure investment – including green and blue infrastructure.
- Delivers high quality design in our buildings and public realm.
- Increases resilience and flexibility in the local economy.
- Builds resilience to the impacts of climate change and flooding.
- Is planned and delivered at a local level while recognising that this will inevitably extend at times across administrative boundaries.

Figure 2: The five guiding principles of the draft Local Plan

<p>Principle 1: Tackling Climate Change To adapt to, and mitigate, the effects of climate change; to reduce carbon dioxide emissions, minimise energy use; improve air quality and protect and enhance our natural environment.</p> <p>To improve the borough’s resilience to climate change.</p>
<p>Principle 2: Protecting and enhancing the quality of the environment Promoting cleaner and greener living, in order to conserve and enhance biodiversity, whilst creating a sustainable environment to live, work and spend our leisure time.</p> <p>Ensuring strong protection of the Green Belt from inappropriate development and protecting and enhancing green and blue spaces to improve biodiversity, connectivity and access.</p> <p>Preserving and enhancing our recognised heritage assets. Ensuring they continue to be conserved in a manner appropriate to their significance.</p>
<p>Principle 3: Delivering homes Improving housing choice and delivering well-designed high-quality homes that we need in a highly sustainable way.</p> <p>Creating, strong and thriving communities.</p>
<p>Principle 4: Growing a prosperous economy Providing the environment and opportunities to foster a prosperous economy with modern, flexible and well-connected workspaces where industries and businesses can thrive.</p> <p>Supporting our town, district and local centres and managing their transition into distinctive places of socialisation, community support, events and culture which are less dependent on a retail offer.</p>

Principle 5: Providing infrastructure and connectivity

Reducing reliance on the car, reducing issues of air quality and congestion and supporting modal shift in the way people live and access local services, workspaces and facilities.

Coordinating the delivery of the right infrastructure in the right place and at the right time for the benefit of residents, businesses and biodiversity and the natural environment.

Figure 3: The elements that have informed, shaped and guided the draft Local Plan



2.31 Once adopted, the Local Plan will sit alongside national, regional and county planning policies and guidance and other Local Plan documents. This includes the saved Special Protection Area policy of the South East Plan, Surrey Minerals & Waste Plans and Supplementary Planning Documents (SPDs) including the Local Design Code, which set out further guidance on the policies contained within the Plan. Together, they set out the framework for how new homes, jobs and infrastructure (the Strategic Priorities) will be delivered in Elmbridge over the next 15 years.

2.32 The new Local Plan will form the basis on which planning applications in the borough will be determined and, once adopted, will replace the 2011 Core Strategy and 2015 Development Management Plan. A number of SPDs produced to support the implementation of the Core Strategy and Development Management Plan will also be rescinded and will be replaced by updated and new SPDs required support the

implementation of the new Local Plan.

Figure 4: The timetable for the preparation of the Local Plan

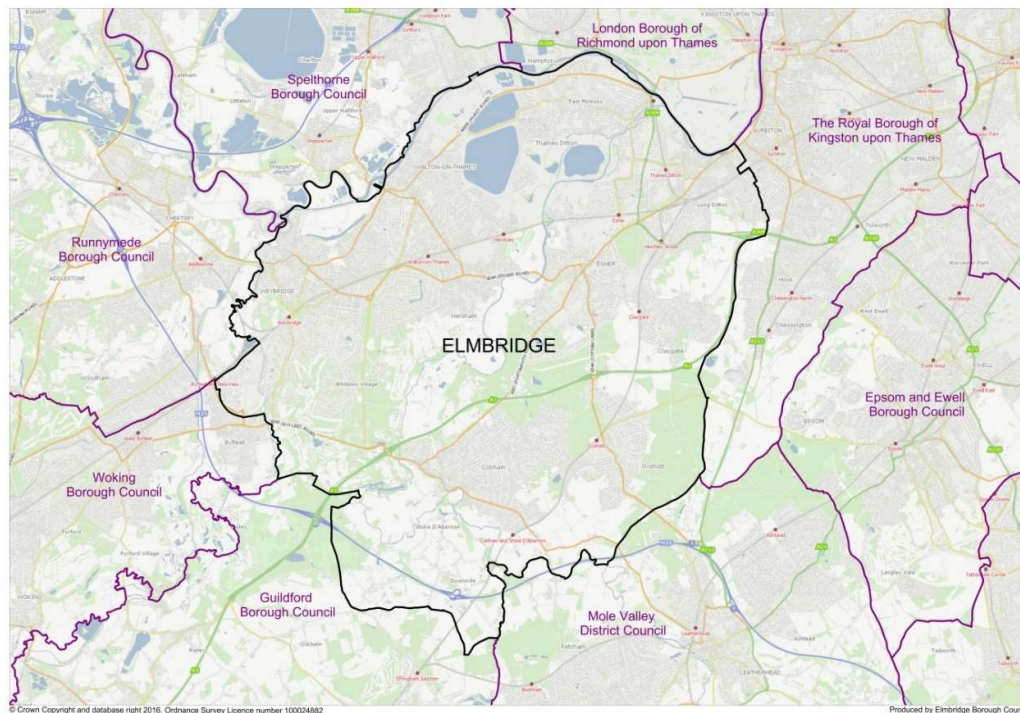


3. Elmbridge Borough: Strategic Context, Geography & Key Challenges

Strategic Context & Geography

- 3.1 Elmbridge is a Surrey borough located in the South East region, approximately 17 miles south west of Central London. Located almost entirely within the bounds of the M25 motorway, the River Thames forms the northern boundary of the borough separating Elmbridge from the London Borough of Richmond-upon-Thames. To the east is the Royal Borough of Kingston-upon-Thames. The remainder of the borough's boundary is shared with the Surrey boroughs of Guildford, Runnymede, Spelthorne and Woking and the district of Mole Valley.

Figure 5: Elmbridge Borough and neighbouring boroughs and districts



- 3.2 Covering just over 9,634 hectares (37.2 square miles), Elmbridge is home to approximately 130,000 residents. Elmbridge is a highly desirable area due to its location and high-quality environment and unique character, in part, owing to the River Thames forming its northern boundary and its extensive green areas including, 57% of our green areas being designated as Green Belt.
- 3.3 However, as with any borough, Elmbridge is not a single homogenous place. Rather, it is a collection of separate and distinctive places and local communities each with its own unique local identity, historic assets and attractive green and natural environment which are highly valued by our communities.

- 3.4 The borough, as a whole, benefits from good accessibility by rail and road to Central London and is within easy reach of Heathrow and Gatwick Airports, the M25 and the M3. The borough regularly features in best places to live and best quality of life polls.

Figure 6: Elmbridge Borough



- 3.5 However, that success brings consequences. The carbon footprint of the borough is one of the highest in the region and must be addressed to improve the borough's resilience to climate change as well as improve biodiversity and issues of air quality and road congestion.
- 3.6 The borough has high-quality green and blue infrastructure that weaves its way through the urban areas and provides invaluable open spaces, highly treasured by local residents. Our urban open spaces play an important role within our green assets/natural capital. However, we must continue to protect and enhance these spaces and work to improve accessibility and strengthen connectivity between them as movement corridors for the benefit of wildlife, climate change mitigation and adaptation as well as for the enjoyment and health and wellbeing of our residents and visitors.
- 3.7 Elmbridge has a rich historic environment that has evolved around historic estates,

towns and villages and this helps to create the borough's local character and distinctiveness. This extensive historic environment and heritage provides a cultural reference to the past and has an important role in place-making and supporting health and wellbeing. These assets provide economic benefits as they bring visitors and provide jobs. The council must support and make the most of these valued assets and carefully balance the need to preserve and enhance our historic environment with the need to deliver good growth.

- 3.8 The borough is one of the most expensive areas in the country to live, with high land values and intense pressure for new development. As a result, too many young people and families are moving out of the borough to have a realistic prospect of owning or renting their own home. Older residents are struggling to affordably downsize in a way that will enable them to continue to live independently or with care packages and remain in their local community. The cost of housing and reliance on people travelling into the borough is also making it difficult for local businesses and valued services to attract and retain employees, this includes essential key workers, such as teachers and health care providers.
- 3.9 The needs of businesses are also changing, as well as how people shop and spend their leisure time. The borough's high streets need support to help them adapt to the changing retail market and become distinctive hubs for socialisation, community support, leisure and culture.

The Key Challenges

- 3.10 The draft Local Plan seeks to positively respond to these issues and changes whilst protecting and enhancing the qualities and features that not only make Elmbridge a sought-after place to live, work and visit but also sustainable and fit for the future.
- 3.11 Thus, the key challenges over the plan-period, that the draft Local Plan seeks to address include:
- Tackling climate change and moving towards a low / zero carbon economy;
 - Protecting and enhancing the natural environment;
 - Delivering more homes supported by the necessary infrastructure;
 - Delivering more affordable homes;
 - Supporting local recovery from Covid-19; and
 - Supporting our town, local and district centres and employment areas.
- 3.12 As evidence in Section 6 of this Statement, to address these issues and determine the direction of the Local Plan, the council has worked with its strategic partners and many of the challenges are strategic in nature, crossing administrative boundaries.

4. Strategic Priorities & Matters: Geographies and Statutory Organisations & Prescribed Bodies

Strategic Priorities

- 4.1 The key challenges identified by the council that are to be addressed in the Local Plan (see paragraphs 3.10 – 3.12) fit with the Government’s identification of Strategic Priorities. As set out in the National Planning Policy Framework (NPPF, 2021) these are the main and high-level objectives that the Local Plan should seek to achieve over the 15 years to realise its vision for the borough.
- 4.2 As set out in Section 2 of this Statement, the NPPF identifies strategic policies as those that set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:
- a) Housing (including affordable housing), employment and retail, leisure and other commercial development;
 - b) Infrastructure for transport; telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - c) Community facilities (such as health, education and cultural infrastructure); and
 - d) Conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure, and planning measures to address climate change mitigation and adaptation.

Scoping the Strategic Matters

- 4.3 Building on the key challenges identified in Section 3, the identification of the Strategic Matters relevant to Elmbridge and who the council needs to cooperate with has been informed by a scoping exercise undertaken in 2014 and resulted in the publication of a Duty to Cooperate Scoping Statement (January 2015) (as amended). The purpose of the Statement and the exercise of inviting comments was:
- to ensure that the council, from the outset of its plan preparation, had formally established what it considered to be the strategic matters and issues that could have a significant impact on two or more planning areas. This included the identification of those authorities and prescribed bodies that the council needed to engage and work with to seek to address the issues and how and when it intended to do this.
 - to provide the opportunity for other local authorities and prescribed bodies to

highlight strategic matters that they considered relevant to the preparation of the Elmbridge Local Plan, which have not been identified. This included whether amendments needed to be made to the list of local authorities and prescribed bodies that the council intended to engage with on each strategic matter, and how and when it intended to do this.

- to form the basis of an agreed approach and commitment from the council in how it will discharge its duty to cooperate on strategic matters and issues as far as they related to the preparation of Local Plan documents.
- to provide a framework for future engagement whereby the council will limit its consultation on duty to cooperate strategic matters to the identified and agreed strategic issues and relevant local authorities and prescribed bodies.

4.4 The council invited comments on a draft of the Scoping Statement from prescribed bodies and others the council considered that it might need to work with to address potential cross-boundary strategic matters. This included a number of infrastructure providers and other interested parties. Comments were invited in November 2014 with those engaged asked to confirm:

- Has the council correctly identified the strategic matters and those which could have a significant impact on at least two planning areas as part of the preparation of its Local Plan documents?
- Has the council correctly identified the relevant authorities, prescribed bodies and other consultees that it needs to proactively engage and work with to maximise the effectiveness of its planning policies in regard to each strategic matter?
- Where there are existing processes in place to consider/address strategic matters and those which could have a significant impact, are these sufficient?
- Do you support the council's intended approach and timetable for engaging with the identified local authorities, prescribed bodies, and other consultees?

4.5 Comments received were used to update the Scoping Statement (early 2015 and September 2016) where relevant and guide the council's engagement on the identified Strategic Matters through the preparation of the Local Plan (set out in Appendix A of the Scoping Statement). On-going work including informal and formal discussions regarding the identified Strategic Matters; the emergence of our Local Plan evidence base and that of other local authorities; and other wider strategies and policies including updates in national policy and guidance have also been utilised to expand the Strategic Matters to be addressed and the mechanisms for doing so.

4.6 On the basis of the Scoping Statement and on-going engagement during the preparation of the draft Local Plan, the following Strategic Matters were identified:

- Strategic Matter 1: Housing (including Affordable Housing)

- Strategic Matter 2: Roma, Gypsies, Travellers and Travelling Showpeople (Travellers) and Houseboats
- Strategic Matter 3: Employment, Retail & Other Commercial Development
- Strategic Matter 4: Transport
- Strategic Matter 5: Flooding
- Strategic Matter 6: Minerals, Waste & Other Utilities
- Strategic Matter 7: Health
- Strategic Matter 8: Education
- Strategic Matter 9: Green & Blue Infrastructure
- Strategic Matter 10: Green Belt & Landscape
- Strategic Matter 11: Natural Environment including Thames Basin Heaths Special Protection Area (TBHSPA)
- Strategic Matter 12: Climate Change
- Strategic Matter 13: Historic Environment
- Strategic Matter 14: Heathrow

4.7 Taking the Strategic Priorities and Strategic Matters above, the following sub-sections provide a summary under each Strategic Matter what issues need to be addressed alongside the geographies involved including, an explanation for these. The prescribed bodies and other organisations / bodies, that the council has worked with to address each strategic matter as part of its Local Plan preparation is also stated. This information is also tabulated in Appendix 1. Each Strategic Matter is also linked to the relevant section of the Vision for the borough (including the concept of good growth) and the guiding principles as set out in the draft Local Plan (see Section 3 of this Statement).

4.8 Further details as to how the council has discharged its duty in relation to each priority / strategic matter is set out in Section 6 of this Statement.

Strategic Priority A: Homes, Employment and Retail & Other Commercial Development

Strategic Matter 1: Housing (including affordable housing)

4.9 Understanding housing need and the distribution of housing is one of the key strategic matters that the Local Plan must address and where co-operation is required. It is also fundamental to achieving the council's vision for the borough and encompassed within the guiding principle.

4.10 Set out in Section 6 and supported by a series of appendices, is an audit of the council's engagement and collaboration with other LPAs and other relevant Partners insofar as the issue of identifying and seeking to address housing need.

4.11 As recorded, the council has tailored its duty to cooperate activities towards certain authorities. This has been for two reasons:

1. References to Housing Market Areas changing to Neighbouring Authorities

4.12 When the National Planning Policy Framework (NPPF) was first published in 2012, paragraph 47 stated:

“To boost significantly the supply of housing, local planning authorities should:

- a) use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period”. (Council’s emphasis)

4.13 However, since the publication of the revised NPPF in 2018, the Framework has made reference (regarding the presumption in favour of sustainable development and how this applies to plan-making) to strategic policies, as a minimum, providing for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within “neighbouring areas”.

4.14 Whilst ‘neighbouring’ has not been defined in terms of the duty to cooperate, at a minimum it is understood to be mean next to or very near another place. The council has therefore tailored activities towards other neighbouring authorities that are outside of the Housing Market Area (HMA).

4.15 In accordance with the NPPF and PPG and, as part of its early plan preparation, the council prepared a Strategic Housing Market Assessment (SHMA) (2016) (and subsequent update) to understand the level of housing need (including for affordable and other types of specialist accommodation) across the borough and wider Housing Market Area (HMA). As part of this, the Assessment identified the HMA in which Elmbridge is located - the Kingston & North-East Surrey HMA (see Figure 7). The HMA covers Elmbridge and the following authorities:

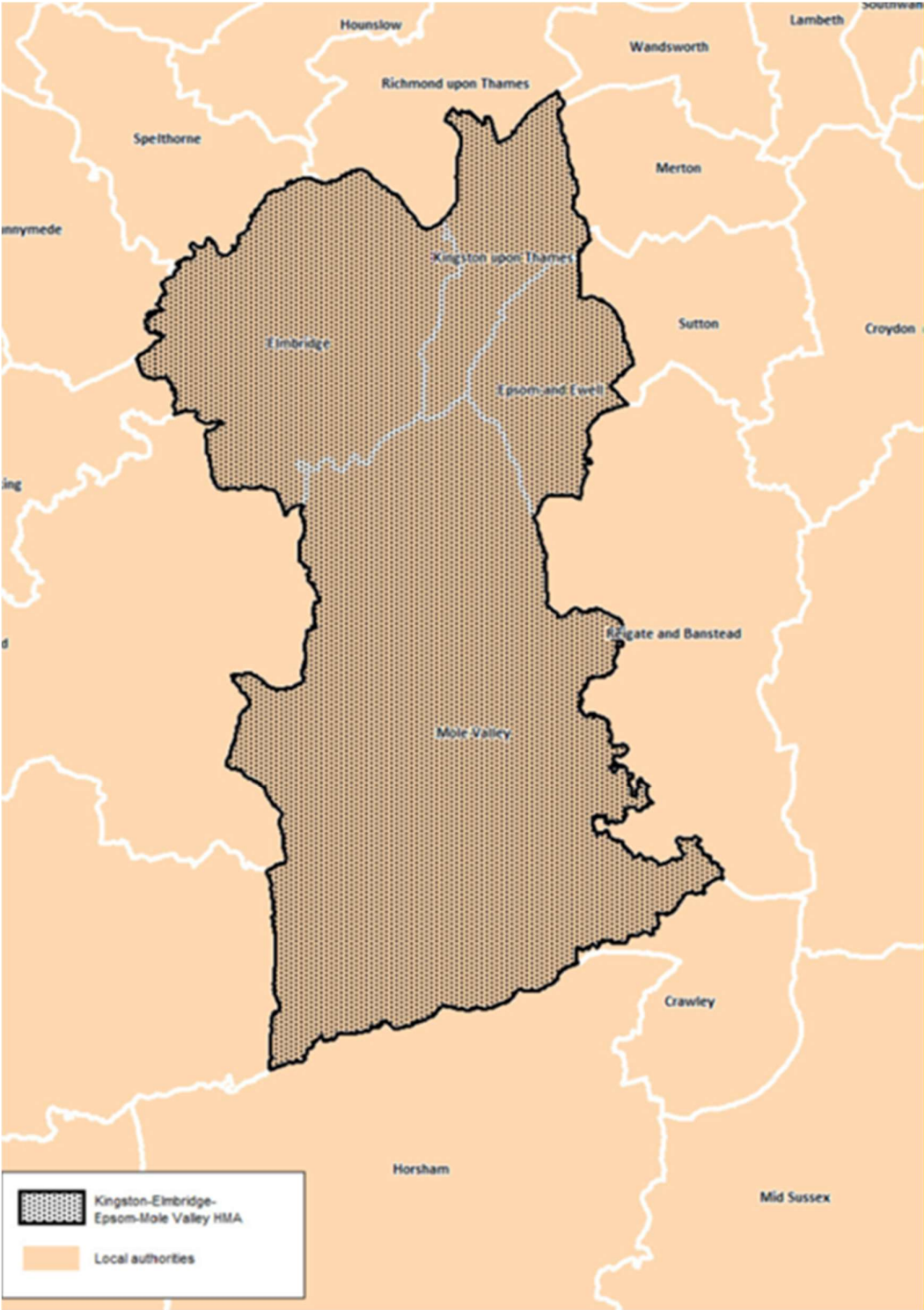
- Royal Borough of Kingston upon Thames
- Epsom & Ewell Borough Council
- Mole Valley District Council

4.16 Given that both Surrey and London Boroughs operate in a two-tier system, it has also been important to engage with Surrey County Council and the Greater London Authority on the strategic matter of establishing and seeking to meet housing need.

4.17 Extending to neighbouring authorities, this has included:

- Guildford Borough Council
- London Borough of Richmond upon Thames
- Runnymede Borough Council
- Spelthorne Borough Council
- Woking Borough Council

Figure 7: The Kingston & North East Surrey HMA



2. Varying Local Plan timetables

- 4.18 In terms of the council's duty to cooperate activities, it must be acknowledged that very few LPAs are preparing a Local Plan whereby all plans within a HMA or even those of neighbouring authorities are being prepared in parallel or to a similar timetable.
- 4.19 This has certainly been the case for the council and the preparation of the draft Local Plan.
- 4.20 The council, not wanting to delay the preparation of its draft Local Plan and to ensure that it has an up to date plan in place by December 2023, has therefore looked to authorities beyond the HMA to enquire as to whether they can assist in meeting any (potential) unmet housing need in advance of the position of some HMA Partners being confirmed as part of their own fully evidenced draft Local Plan.
- 4.21 In addition to the above, the council has found that it has had limited ability to influence the preparation of more advanced local plans and discuss the possibility of that authority meeting some of Elmbridge's (potential) unmet housing need when the LPA had advanced to the Regulation 19 Stage or beyond and thus had determined their preferred spatial strategy including the number of homes to be provided.
- 4.22 This has principally been the case regarding the London Borough of Richmond upon Thames and Guildford, Runnymede and Woking Borough Councils.
- 4.23 Therefore, when seeking focused meeting with other LPAs on the issue of addressing housing need, the council has focused its attention on those LPAs at a similar stage in the local plan process (and their HMA partners) and those behind whereby that LPA has the ability to consider whether they can meet any (potential) unmet need arising from Elmbridge Borough.
- 4.24 The council has also engaged other authorities in the wider South East Region to explore the possibility of them being able to accommodate any potential unmet housing need within the existing urban areas (see Strategic Matter 1 in Section 6 for further details). In addition, the Enterprise M3 LEP and Homes, Communities Agency (HCA) / Homes England (HE) and Surrey Futures have been engaged insofar as meeting housing need and the option of amending Green Belt boundaries to do so which, was explored by the council as part of its plan-making process and the need to consider options for meeting housing need.

The preparation of the draft Elmbridge Local Plan

- 4.25 In undertaking duty to cooperate activities, the council has sought to ensure that it is proportionate to the stage of the plan-making process. The stages and timeframe for the preparation of the draft Local Plan are summarised in Figure 4.
- 4.26 Furthermore, it is important to note that some duty to cooperate activities have been repeated e.g. asking on more than one occasion if another LPA can help assist in meeting the (potential) unmet housing need in Elmbridge Borough. This has been due to several reasons including the Local Plan evidence evolving overtime that has

identified / confirmed the potential level of unmet housing need within borough. In addition, given the passage of time and as other LPAs' evidence bases and their Local Plans have evolved, there has been the potential that their ability to assist in meeting any (potential) unmet need arising from Elmbridge Borough has changed.

- 4.27 In regard to addressing housing need within the borough, the council has been aware from the outset of the preparation of the new Local Plan that meeting its housing need in the urban areas would be a challenge given the level of constraints to development including Green Belt.
- 4.28 Therefore, in accordance with the NPPF, the council has raised the issue of (potential) unmet housing arising from the borough with other LPAs as early as the Local Plan: Strategic Options Consultation in 2016/17. Nevertheless, the level of unmet housing need arising from the borough was not formally confirmed until the council determined its preferred spatial strategy as part of the draft Local Plan at a Special Council Meeting⁶.

Strategic Matter 2: Roma, Gypsies, Travellers & Travelling Showpeople and Houseboat Dwellers

- 4.29 In accordance with the NPPF and the Government's planning policy for traveller sites (March 2012), the council is also required as part of its plan-making process, to assess and plan for the needs of the travelling community. Providing for the accommodation needs of Travellers also forms part of the Local Plan guiding principle of delivering homes: improving housing choice and delivering well-designed high-quality homes that we need in a highly sustainable way.
- 4.30 Historically, the Surrey authorities have worked together to assess the accommodation needs of the travelling community and consider how these can be met. For example, the commitment has been made by Surrey Chief Executive Officers to work together to identify opportunities for providing a network of transit sites / additional provision across the County. This work is being led by Surrey County Council. Previous joint-studies and / or methodologies have also been undertaken / utilised across Surrey on the basis that the travelling community in Surrey is static and seek a permanent residence within the County as opposed to other neighbouring areas.
- 4.31 Therefore, in addition to those authorities specifically listed above under Strategic Matter 1, the need to co-operate on this strategic matter has been extended to:
- Reigate & Banstead Borough Council
 - Surrey County Council
 - Surrey Heath Borough Council
 - Tandridge Borough Council
 - Waverley Borough Council

⁶ The Council agreed a draft Local Plan for the Regulation 19 Stage at a Special Council Meeting on 22 March 2022. However, several amendments to the evidence base and draft Local Plan were subsequently made during the period of purdah. As such, an amended draft Local Plan was presented back to Council on 13 June 2022 and agreed for the Regulation 19 Stage.

4.32 Regarding houseboats dwellers, provisions set out in the Housing and Planning Act now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in, or resorting to, their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored.

4.33 In addition, paragraph 62 of the NPPF states, “within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)”.

4.34 In accordance with the Housing Act and NPPF, the council commissioned a Boat Dwellers Accommodation Assessment (2022). In seeking to address the level of need identified in the Assessment, the council has engaged:

- London Borough of Richmond upon Thames
- Royal Borough of Kingston upon Thames
- Runnymede Borough Council
- Spelthorne Borough Council
- Surrey County Council

4.35 These authorities are our neighbouring local authorities through which the River Thames also runs. Furthermore, the council has engaged the Environment Agency as a landowner of parts of the Riverbank. Where the Environment Agency is the landowner, they provide mooring facilities at a number of lock sites, and at a small number of locations in between some of the lock sites.

Strategic Matter 3: Employment, Retail and Other Commercial Developments

4.36 Achieving a prosperous economy forms part of the council’s vision for the borough as set out in the draft Local Plan. As part of the concept of ‘good growth’, this includes increasing resilience and flexibility in the local economy and, as identified in the guiding principle (growing a prosperous economy), this involves providing the environment and opportunities to foster a prosperous economy with modern, flexible and well-connected workspaces where industries and business can thrive. In relation to the borough’s town and villages centres, the council is seeking to manage their transition into distinctive places of socialisation, community support, events and culture which are less dependent on a retail offer.

4.37 In regard to employment, the Government’s focus through the NPPF is building a strong and competitive economy with authorities creating the conditions which businesses can invest, expand and adapt. The Government places significant weight on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.

4.38 In terms of determining the type of employment land that is needed, PPG states that a robust evidence base is required which is kept under review to reflect local circumstances and market conditions. PPG also states that in addressing economic needs and the duty to cooperate the areas covered under a SoCGs could be defined on the basis of Functional Economic Areas (FEMAs):

4.39 As part of the council's evidence base informing the Local Plan and the work of the Enterprise M3 Local Economic Partnership (LEP), Elmbridge is identified as part of the Outer London / North Surrey FEMA (see Figure 8) alongside the following authorities:

- Runnymede Borough Council
- Spelthorne Borough Council

4.40 The Enterprise M3 LEP, Surrey County Council, London Borough of Richmond upon Thames, Greater London Authority and Heathrow Strategic Planning Group are also important partners to engage with as part of the preparation of the Local Plan and addressing the strategic matter of employment.

4.41 In relation to retail, Elmbridge is characterised by a number of smaller town and local centres that mainly meet the day-to-day shopping needs of their local communities. Each centre fulfils a different role and function, and each forms part of a wider network of centres both within and outside of the borough.

Figure 8: Outer London / North Surrey FEMA (Upper M3) Functional Economic Area



4.42 In considering the future of the borough's retail centres / provision, it is important to have regard to their relative role and potential impacts on other centres within the wider area and vice versa. As there is no regional centre in Elmbridge, many of

Elmbridge's residents travel outside of the borough to large centres in Kingston, Guildford and Woking for their main shopping needs.

4.43 In addition, work undertaken by the Enterprise M3 LEP identifies both Guildford and Woking as Growth Towns. Alongside Farnborough and Basingstoke, these towns deliver one third of the jobs and GVA in the Enterprise M3 LEP area. Ensuring their continued success is considered fundamental to the success of the whole Enterprise M3 area and the UK economy as a whole.

4.44 The Enterprise M3 LEP also identifies Staines-upon-Thames as a 'Step-up-Town'. This is an area with the ability to grow subject to the removal of identified barriers to growth e.g. accessibility.

4.45 Based on the above, the council has co-operated with:

- Guildford Borough Council
- Royal Borough of Kingston upon Thames
- Spelthorne Borough Council
- Woking Borough Council

Strategic Priority B: Infrastructure

Strategic Matter 4: Transport

4.46 The council's vision for the borough is one that delivers sustainable development and, with a focus on infrastructure, fosters good growth which is supported by the delivery of the right infrastructure in the right places at the right times. In delivering the vision, the guiding principle of infrastructure and connectivity seeks a reduction in the reliance on the car, reducing issues of air quality and congestion and supporting a modal shift in the way people live and access local services, workplaces and facilities. The guiding principle also states that in regard to the right infrastructure, this should be provided in the right places and at the right time for the benefit of residents, businesses and biodiversity and the natural environment.

4.47 One of the key strategic matters that the council has therefore had to consider when preparing the draft Local Plan is whether the additional demand on the road network (both strategic and local), as a result of new development, can be accommodated and / or mitigated and, in light of our commitment for a more sustainable Elmbridge and in-line with the policies of the NPPF and other legislation, how a modal shift towards more sustainable modes of travel (including walking and cycling) can be achieved.

4.48 The delivery of the appropriate transport infrastructure capacity and improvements arising from development set out in the draft Local Plan may have an impact outside the borough and likewise Local Plans produced by other local authorities may have an impact on transport infrastructure within Elmbridge. As such, transport infrastructure requires a substantial amount of cross boundary co-operation. Enabling a modal shift also requires co-operation as this relies on several public and private organisations

particular as Surrey County Council is the Local Highway Authority.

4.49 In seeking to address these strategic matters, the council has co-operated with:

- Epsom & Ewell Borough Council
- Guildford Borough Council
- London Borough of Richmond upon Thames
- Mole Valley District Council
- National Highways
- Network Rail
- Royal Borough of Kingston upon Thames
- Runnymede Borough Council
- South Western Railway
- Spelthorne Borough Council
- Surrey County Council – the Highways Authority
- Transport for London (TfL)
- Transport for the South East
- Woking Borough Council

Strategic Matter 5: Flooding

4.50 Similar to Strategic Matter 4, addressing the issue of flooding is linked to the council's vision for the borough in terms of tackling climate change delivering sustainable development and providing the right infrastructure to support growth. As part of the concept of good growth, the draft Local Plan emphasises that the council is seeking to build on the borough's resilience to the impacts of climate change and flooding; this is encapsulated under the guiding principles of tackling climate change; protecting and enhancing the quality of the environment and providing infrastructure and connectivity.

4.51 Elmbridge has a significant flood context, with the River Thames (Lower) forming its northern boundary, and the Rivers Wey, Mole, Dead and Rythe all running through it. There are also areas of the borough at risk from surface water and reservoir flooding with further localised issues occurring when rivers are high, or drainage and sewer systems are over capacity or there are blockages in the system.

4.52 By its very nature, flooding is an issue that has significant and / or cross boundary impacts. The causes and impacts of flooding do not respect administrative boundaries and a wide range of organisations have responsibilities for managing flood risk either due to land ownership or statutory duties. It has been essential that through the preparation of the draft Local Plan, that these organisation have worked together in order to reduce flood risk overall and manage / mitigate its impacts. This could be through locating development away from areas at high risk of flood or through the implementation of flood defenses.

4.53 Due to the strategic matters identified and, on the basis of neighbouring local authorities, those local authorities in the same catchment areas or organisations who have a responsibility in those areas, the council has co-operated with:

- Enterprise M3 LEP
- Environment Agency
- Epsom and Ewell Borough Council
- Greater London Authority / Transport for London
- Guildford Borough Council
- Highways Agency / Highways England
- Historic England
- Homes and Communities Agency / Homes England
- London Borough of Richmond upon Thames
- Mole Valley District Council
- Natural England
- Reigate & Banstead Borough Council
- Royal Borough of Kingston upon Thames
- Royal Borough of Windsor & Maidenhead
- Runnymede Borough Council
- Spelthorne Borough Council
- Surrey County Council
- Surrey Futures Board
- Surrey Heath Borough Council
- Tandridge District Council
- Thames Water
- Waverley Borough Council
- Woking Borough Council

Strategic Matter 6: Minerals, Waste and Other Utilities

- 4.54 Utilities infrastructure includes minerals, waste disposal, water supply, wastewater treatment, energy supply and telecommunications. These services and their associated infrastructure are provided by the County Council and private sector utility companies which operate within and around the Elmbridge area.
- 4.55 When shaping the policies of the draft Local Plan it has been necessary to understand the capacity of our existing infrastructure network and to identify whether improvements are required to support our development strategy or, if our development strategy and ambitions including, where new development is located, are limited by the infrastructure network and / or other planned development in neighbouring areas.
- 4.56 The provision of utilities is linked to the council's vision for the borough in terms of ensuring that good growth is supported by the delivery of the right infrastructure in the right places at the right times. This is guided by the principle of providing infrastructure and connectivity.
- 4.57 The council is also seeking to ensure that the policies it is seeking to implement e.g. the allocation / designation of certain sites for development / protection, do not compromise the operation of existing minerals / waste sites and future opportunities in the borough. It is also important to understand how existing minerals and waste sites

within the borough and / or on the boundaries with neighbouring authorities could influence the site selection process. For example, not directing development towards locations where there are minerals and or waste sites which could impact on the residential amenity of future residents in terms of extraction, noise, dust and odour. As the authority responsible for minerals and waste planning, the council has co-operated with Surrey County Council on this strategic matter.

4.58 Other than the County Council (which acts for Surrey boroughs and districts on the strategic matter of mineral and waste), our two neighbouring London Boroughs and the Environment Agency; utility providers are not subject to the statutory duty however, the NPPF states that local planning authorities should also work collaboratively with private sector bodies, utility and infrastructure providers. The council has therefore engaged with the following infrastructure providers to inform the draft Local Plan policies:

- Affinity Water Services
- British Telecommunications PLC / Openreach
- National Grid
- Southern Gas Network (SGN)
- SSE
- Sutton & East Surrey (SES) Water
- Thames Water Utilities Ltd
- UK Power Networks

Strategic Priority C: Community Facilities

Strategic Matter 7: Health

4.59 Within the draft Local Plan, the vision of providing good growth is partly defined by supporting overall improvements to the health and well-being of our residents and delivering the right infrastructure. As with other types of infrastructure, when shaping the policies of the draft Local Plan it has been necessary to understand the capacity of our existing health facilities and to identify whether improvements are required to support our development strategy or if our development strategy and ambitions including, where we locate new development are limited by the infrastructure network.

4.60 During the preparation of the draft Local Plan, those organisation responsible for health provision in the borough has continuously changed. The Health and Social Care Act 2012 led to a number of changes within the National Health Service (NHS). Clinical Commissioning Groups (CCGs) were formed to commission most of the hospital and community NHS services in a local area. CCGs are overseen by NHS England, which retains responsibility for commissioning primary care services such as GP and dental services, as well as some specialised hospital services. They are clinically led groups, which include all GP practices in their area, meaning that local health professionals have an input into the healthcare commissioned for patients in their area. This is to ensure the infrastructure required is based on expert local understanding and comes directly from the NHS.

4.61 Services that the CCGs have been commissioned to provide included: include:

- Most planned hospital care;
- GP Surgeries/Dentists;
- Rehabilitative care;
- Urgent and emergency care (including out of hours);
- Most community health services; and
- Mental health and learning disability services.

4.62 The North West Surrey CCG and the Surrey Downs CCG covers the borough, both of which form the Surrey Heartlands CCG, along with Guildford and Waverley CCG.

4.63 In 2016, NHS organisations and local councils came together to form Sustainability and Transformation Partnerships (STPs). Covering the whole of England, the STPs set out proposals to improve health and care for patients. Some area partnerships have evolved to form an Integrated Care System (ICS), a new type of even closer collaboration. In an ICS, NHS organisations, in partnership with local councils and others, take collective responsibility for managing resources, delivering NHS standards, and improving the health of the population they serve.

4.64 In April 2020, the three Surrey Heartlands CCGs (Guildford and Waverley, North West Surrey and Surrey Downs) merged with East Surrey CCG to form the Surrey Heartlands Health and Care Partnership ICS to extend the partnership of health and care organisations working together to improve local services and support people to live healthier lives.

4.65 In addition, following the Health and Social Care Act 2012, Surrey County Council became responsible for a number of Public Health functions (2013) including health improvements for the population of Surrey, especially for the most disadvantaged.

4.66 As part of the preparation of its draft Local Plan, the council has co-operated with the relevant health authorities as listed above which has responsibility for health services across neighbouring Surrey Boroughs and Districts. The council has engaged with neighbouring London Boroughs directly.

Strategic Matter 8: Education

4.67 As with health provision, ensuring that our education infrastructure is provided for in the right place at the right time, is a fundamental component of delivering good growth through the Local Plan. As with other types of infrastructure, when shaping the policies of the new Local Plan it has been necessary to understand the capacity of our existing education facilities and to identify whether improvements are required to support our development strategy or if our development strategy and ambitions including, where we locate new development are limited by the infrastructure network.

4.68 In providing sufficient school places in the area, the council has cooperated with Surrey County Council as the education authority (which acts for Surrey boroughs and

districts on the strategic matter education), our two neighbouring London Boroughs, the Department of Education and the Education Funding Agency.

Strategic Priority D: Conservation and enhancement of the natural, built and historic environment

Strategic Matter 9: Green & Blue Infrastructure

4.69 The vision for the borough includes the commitment to protect and enhance our established network of green and blue spaces to improve biodiversity, connectivity and access. In regard to green and blue infrastructure, the guiding principles as set out in the draft Local Plan, state that the council will sustain the natural environment for the benefit of existing residents and future generations.

4.70 A diverse and complex network of environmental features make up green and blue infrastructure in Elmbridge. These features range from parks, green spaces and common land to private gardens, school grounds, church yards, and rivers and reservoirs for example. As identified by under other strategic matters, by the very nature of green and blue infrastructure, the council has had to co-operate with its neighbouring authorities and also those organisations and bodies with a responsibility in the arena of green and blue infrastructure.

4.71 As part of the preparation of the draft Local Plan and under the strategic matter of Green and Blue Infrastructure, the council has co-operated on two key areas:

- Thames Landscape Strategy
- Local Green Space (designations)

Thames Landscape Strategy

4.72 The Thames Landscape Strategy is a not-for-profit partnership which seeks to conserve and promote the special character of the river corridor between Weybridge, Hampton and Kew. Launched in 1994 and updated in 2012, the Strategy originally sought to restore a network of neglected historic vistas and avenues along and across the river but has evolved to design and implement a range of initiatives concerning recreation, land management, nature conservation, flood risk management, habitat creation, historic restoration, river access and use, visitor provision and landscape enhancement. The partnership is currently working on projects related to floodplain restoration, riverbank naturalisation and habitat enhancement.

4.73 The partnership brings together 14 funding partners as set out below (including the council):

- Royal Borough of Kingston upon Thames
- London Borough of Richmond upon Thames
- London Borough of Hounslow
- Environmental Agency

- The Royal Parks Agency
- The National Trust
- English Heritage
- Historic Royal Palaces
- Royal Botanic Gardens Kew
- Port of London Authority
- Surrey County Council
- Crown Estate
- Kingston University

Local Green Space

- 4.74 The NPPF introduces this new designation for areas that are valued by local communities. These areas are to be identified via the preparation of Local Plans and whereby the policies for managing development within a Local Green Space should be consistent with those for Green Belt. In accordance with the NPPF areas suggested for local green space must be identified and valued by the local community.
- 4.75 Due to their 'local' nature, it is unlikely that cross-boundary issues will exist. The only exception to this is where residential properties in adjoining boroughs directly adjoin areas in Elmbridge on the Thames Ditton / Long Ditton (Elmbridge Borough) and Surbiton (Kingston upon Thames) border. Consequently, there is the possibility that areas within Elmbridge could be considered as valued community 'local green spaces' by residents in an adjoining local authority area.
- 4.76 As such, the council has engaged with the Royal Borough of Kingston upon Thames on this strategic matter with the expectation that any responses will reflect issues raised by their residents and elected representatives.
- 4.77 The council has also engaged with the following bodies and groups on the basis of their responsibilities / interest in this area: London Nature Partnership, Open Space Society, Sport England, Surrey Wildlife Trust (Local Nature Partnership) and Royal Society for the Protection of Birds.

Strategic Matter 10: Green Belt and Landscape

- 4.78 The vision for the borough includes the commitment to protect and enhance our established network of green and blue spaces and to sustain our natural environment for the benefit of existing residents and future generations. The guiding principle of protecting and enhancing the quality of the environment makes clear that strong protection will be afforded to the Green Belt from inappropriate development.
- 4.79 Elmbridge's settlements are surrounded by the Metropolitan Green Belt which covers 57% of the land in the borough and, in part, contributes to the area's high-quality environment alongside land designated as public open space. The Green Belt straddles the boundaries of several adjoining boroughs and joint-working and cooperation is necessary to ensure that the overall coherence of the Metropolitan

Green Belt is safeguarded whilst also seeking to address housing need.

4.80 As part of the preparation of the draft Local Plan, the council has co-operated with the following authorities on this strategic matter:

- Epsom and Ewell Borough Council
- Guildford Borough Council
- London Borough of Richmond upon Thames
- Mole Valley District Council
- Reigate & Banstead Borough Council
- Royal Borough of Kingston upon Thames
- Runnymede Borough Council
- Spelthorne Borough Council
- Surrey County Council
- Surrey Heath Borough Council
- Tandridge District Council
- Waverley Borough Council
- Woking Borough Council

4.81 The above authorities are those that share a boundary with the borough and / or form part of the Surrey boroughs and districts that are located in neighbouring HMAs.

4.82 In addition, the council has sought to engage with the Greater London Authority given that the Green Belt within Elmbridge falls within the wider Metropolitan Green Belt around London. During the early stages of the evidence base review on this strategic matter, the council also sought to engage the Enterprise M3 LEP and Homes and Communities Agency (HCA) / Homes England (HE) insofar as meeting housing need and the potential option of amending Green Belt boundaries to do so which, was explored by the council as part of its plan-making process and the need to consider options for meeting housing need.

4.83 There are no national landscape designations affecting Elmbridge. However, the council is mindful that its landscape is highly valued by its residents and has shaped the development of its communities and will continue to do so. In terms the draft Local Plan, the council acknowledges that the extent to which the character and quality of the landscape in the borough is sensitive to change from the introduction of development scenario, will impact on its future development strategy. The council has therefore engaged with neighbouring authorities on this strategic matter.

4.84 In addition, to those Strategic Partners identified above, the council has also engaged with Historic England, Natural England and the Local Nature Partnership / Surrey Wildlife Trust on landscaping matters.

Strategic Matter 11: Natural Environment including Thames Basin Heaths Special Protection Area (SPA)

4.85 Elmbridge has a wealth of sites containing important biodiversity resources including

parts of two internationally designated Special Protection Areas (SPAs), three nationally-recognised Sites of Special Scientific Importance (SSSIs), twenty Sites of Nature Conservation Importance (SNCIs) and five Local Nature Reserves (LNRs). As well as these formally designated locations, the borough also benefits from a range of habitat types.

- 4.86 Habitats and ecological networks cross local authority boundaries and therefore require co-operation. The key area under this strategic matter that has required co-operation is the Thames Basin Heaths, which covers parts of Surrey, Hampshire and Berkshire, and was designated as a Special Protection Area in 2005 under EU Habitats Directive in recognition of its importance for three rare species of ground nesting birds. Within Elmbridge the area covers Chatley Heath to the south of the borough, part of the Ockham and Wisley Commons SSSIs.
- 4.87 Natural England considers that the intensification of residential development up to a distance of 7km away from the SPA would result in a range of pressures, such as a growth in the number of walkers, cats and dogs, with likely significant adverse effects on the protected habitat. As a consequence, a package of avoidance and mitigation measures for the delivery of new housing needs is in place across the affected authorities (11 authorities across the three County areas)⁷.
- 4.88 In seeking to ensure that the council's development strategy can be accommodated without undermining the integrity of the Thames Basin Heaths SPA, the council has continued to co-operate with Natural England on this strategic matter and also through both an officer working group and a Joint Members Strategic Partnership Board.
- 4.89 The local authorities forming the Board and who the council has continued to co-operate with are:
- Bracknell Forest Borough Council
 - Guildford Borough Council
 - Hart District Council
 - Royal Borough of Windsor and Maidenhead
 - Runnymede Borough Council
 - Rushmoor Borough Council
 - Surrey Heath Borough Council
 - Waverley Borough Council
 - Woking Borough Council
 - Wokingham Borough Council
- 4.90 Protecting the integrity of the Thames Basin Heaths SPA sits under many elements of the vision and guiding principles of the draft Local Plan. The SPA forms part of the natural environment and the established network of green and blue spaces that the council is seeking to protect and enhance with improved biodiversity. In addition, the

⁷ Thames Basin Heaths Special Protection Area Delivery Framework, Thames Basin Heaths Joint Strategic Partnership Board (January 2009).

provision of SANG forms part of the council's commitment to ensure that the right infrastructure is in place to support development.

- 4.91 Due to the cross boundary natural of our natural environment, including habitats and biodiversity, the council also engaged all neighbouring boroughs and districts, Surrey County Council, the Greater London Authority and the Environment Agency.

Strategic Matter 12: Climate Change

- 4.92 Climate change is specified as one of the strategic matters that is relevant for the duty to cooperate, but it is also the case that climate change is a global rather than local issue, and it is therefore difficult to define a limit to where the duty to cooperate should end.
- 4.93 As a practical solution, the council has principally linked this strategic matter to and co-operated with those authorities and organisations which seek to address the causes of, and seek to mitigate and adapt to, the effects of climate change. For example, promoting a modal shift in transport options away from the private vehicle (Strategic Matter 4), promoting Green & Blue Infrastructure (Strategic Matter 9) and ensuring that development is directed away from areas liable to flood (Strategic Matter 5).
- 4.94 In addition, the council has engaged with Surrey County Council, all Surrey boroughs and districts, neighbouring authorities and other partners to seek to align policy approaches, share best practice and to feed into several evidence base studies which seek to combat climate change.

Strategic Matter 13: Historic Environment

- 4.95 Included within the vision for the borough is the aim of protecting and enhancing the built and historic environment for the benefit of existing residents and future generations. This thread is also pulled through into the guiding principles: Protecting and enhancing the quality of the environment, with reference made to preserving and enhancing our recognised and irreplaceable heritage assets ensuring they continue to be conserved in a manner appropriate to their significance.
- 4.96 Elmbridge has a rich historic environment that has evolved around historic estates, towns and villages and this helps to create the borough's local character and distinctiveness.
- 4.97 In regard to cross-boundary issues, the majority of issues are likely to arise when it comes to the allocation of sites for development e.g. the potential impact of allocating a site for development that adjoins a neighbouring authority and a heritage asset within that local authority area. In considering such strategic matters, it will be important to co-operate with adjoining authorities (Guildford Borough Council, London Borough of Richmond upon Thames, Royal Borough of Kingston upon Thames, Mole Valley District Council, Runnymede Borough Council, Spelthorne Borough Council and Woking Borough Council) and the Greater London Authority where necessary.

4.98 It is considered that co-operation with Surrey County Council and Historic England will be required as authorities / bodies that have statutory responsibilities in these areas. Furthermore, Surrey Wildlife Trust / Local Natural Partnership, The Gardens Trust / Surrey Gardens Trust and The Thames Landscape Partnership has also been engaged where relevant.

Other Strategic Priorities

Strategic Matter 14: Heathrow

4.99 In regard to Other Strategic Priorities, the council has been involved in discussions around the potential expansion of Heathrow Airport / 3rd runway, insofar as being a neighbouring borough which could be impacted (both positively and negatively) by the plans.

4.100 To consider strategic matters relating to Heathrow, the Heathrow Strategic Planning Group (HSPG) was established in late 2015 with the understanding that collaborative working will lead to greater understanding and influence over the potential impact of airport expansion on the wider area and help authorities to minimise the potential harmful impacts and maximise the potential benefits of expansion through joint representation to Government, Heathrow Airport Limited and other key stakeholders.

4.101 In regard to other local authorities, the Full Members of the Group are:

- London Borough of Ealing
- London Borough of Hounslow
- Runnymede Borough Council
- Slough Borough Council
- Spelthorne Borough Council
- Surrey County Council

4.102 The Enterprise M3, Thames Valley Berkshire and Buckinghamshire Thames Valley LEPs are also Full Members of the Group.

4.103 Other organisations participate in many of the activities of HSPG with 'Observer' status, including: Buckinghamshire Council, Department for Transport (Aviation Team and others), Environment Agency, Highways England, Independent Commission on Civil Aviation Noise, London Borough of Hillingdon, London Borough of Richmond upon Thames, Natural England, Public Health England, Royal Borough of Windsor and Maidenhead, Strategy Aviation Special Interest Group (of the Local Government Association), Transport for London, West London Alliance (of West London Boroughs), West London Businesses, and the Colne Valley Regional Park Community Interest Company (CIC).

4.104 The current focus of the HSPG is recovery from the Covid 19 pandemic and downturn, to ensure local communities and businesses reliant on the airport can quickly get back on their feet, whilst ensuring a better environment is also created.

5. Mechanisms for Co-operation

Collaborative Working Frameworks

- 5.1 The council has a history of collaborative working and engaging with other local authorities and bodies both at an officer and Member (Councillor) level. Collaborative working which the council is involved with includes various working groups and partnerships, some of which were set up prior to the duty and have been in operation for some time. Others have evolved through the preparation of the draft Local Plan as the council and its partners have acknowledged that existing groups may not have been fully sufficient or suitable to meet duty to cooperate requirements for all strategic issues.
- 5.2 The working groups and partnerships that Elmbridge officers and / or Councillors attend provide a vehicle to discuss strategic matters and duty to cooperate issues. During the preparation of the draft Local Plan, the council has sought to utilise such mechanisms for cooperation in order to facilitate engagement and collaborative working on strategic issues.
- 5.3 Details of such groups including their purpose, key priorities and workstreams, membership / governance arrangements and frequency of meetings are listed below. This list is not exhaustive but includes those groups and partnerships which have had the most influence on our Local Plan preparation, including the evidence base, and those wider strategic plans and priorities that the draft Local Plan seeks to deliver. In some cases, the working groups and priorities have evolved over the course of preparing the draft Local Plan to reflect changes in the wider planning context in which it was prepared e.g. the COVID-19 pandemic and the climate change emergency.

Strategic Spatial Planning Liaison Group (SSPOLG) / Officer Working Group

- 5.4 The Mayor of London is one of the prescribed bodies. The council has cooperated with the Mayor through the Greater London Authority (GLA). In October 2012, the Mayor of London explored options for future cross-boundary work on strategic planning for London and the Wider South East. During 2013, he also held two well-attended officer workshops with representatives from planning authorities across the Wider South East to discuss relevant strategic planning issues. Subsequently, a working group of officers was established to explore strategic planning issues and examine the mechanisms for ongoing coordination and cooperation. The Strategic Spatial Planning Officer Liaison Group (SSPOLG) was formed in 2015 and has focused mainly on housing, infrastructure and demography. Surrey, and Elmbridge borough, has been represented on this group by two officers – one borough / district and the other a lead officer from Surrey County Council.
- 5.5 SSPOLG has also supported the member level round table discussions and Summits that have taken place since early 2015. As part of this cooperation, the Leaders of

local authorities within the wider South East and the LEPs discussed the best way forward and shaped the priority areas of work. There has also been discussion on the preferred political arrangements for issues to be raised and addressed.

- 5.6 As a result of these discussions, a formal Political Steering Group was set up to initiate, steer and agree strategic collaboration activities across the wider South East. The Group meets 2 - 3 times per year and includes five political representatives from the East of England, South East and London. The Surrey County Council Deputy Leader is a member of this group and is therefore representing Surrey, and Elmbridge borough, interests. In addition to this, there is an Officer Working Group (OWG), that is the successor to SSPOLG, which meets regularly to support the Political Steering Group. There are two Surrey representatives (currently represented by an officer from Surrey County Council and Spelthorne Borough Council) and the council will continue to input into this process through them.

Surrey Leaders' Group

- 5.7 The Surrey Leaders' Group (SLG) is a partnership of all 11 borough and district councils in Surrey, together with Surrey County Council. It provides a forum where those councils can work together to discuss strategic issues and act as a strong representative body for local government in Surrey.
- 5.8 The SLG comprises the leaders (or equivalent) of all borough and district councils and the leader and deputy leader of Surrey County Council and is supported by the chief executives / managing directors from the local authorities.

Surrey Future – Local Strategic Statement & Surrey 2050 Place Ambition

- 5.9 Officially launched on 6 March 2013, Surrey Future brings together Surrey's local authorities and business leaders to agree the investment priorities to support the county's economy with the aim of retaining existing businesses and attracting new ones in the right locations. Building on the existing or emerging Local Plan of each of the 11 districts and boroughs in Surrey and the aims of the Local Enterprise Partnerships (LEPs) covering Surrey (Enterprise M3 and Coast to Capital), the initial focus for Surrey Future was on the strategic physical infrastructure required to deliver the economic development and spatial growth priorities in these plans.
- 5.10 Surrey Future is guided by a Steering Board (the Surrey Future Steering Group) the chair, up until March 2022, being the Chief Executive of Elmbridge Borough Council. Memberships includes Executive and Directors from the Surrey boroughs and districts and the County Council; the LEPs; the Gatwick Diamond Initiative; Surrey Nature Partnership; and the Chair of the Surrey Employment and Skills Board. The Board also has the Deputy Leader of Surrey County Council as a champion.
- 5.11 In July 2014, the Surrey Leaders' Group agreed to establish a Strategic Planning and Infrastructure Partnership to facilitate joint working to address strategic issues and deliver on strategic priorities. The scope of the Partnership envisaged the development of a planning and investment framework comprising:

- 1) A Local Strategic Statement (LSS) that sets out shared objectives around spatial, infrastructure and economic issues and a broad direction for spatial planning on strategic priorities;
 - 2) A Memorandum of Understanding (MoU) on how councils will work together towards an LSS and more generally on strategic planning; and,
 - 3) An Investment Framework to support the delivery of the strategic priorities in the LSS including a co-ordinated approach to infrastructure funding and delivery that builds on the Surrey Infrastructure Study (SIS).
- 5.11 The aim of the LSS was to set out a consensus around common objectives and priorities through an overarching spatial planning vision for Surrey, covering the period 2016 to 2031. Although a non-statutory document, it would be a key tool to help councils manage growth sustainably and to provide important evidence for Surrey boroughs and districts to demonstrate that strategic cooperation was an integral part of their Local Plan preparation. It would be informed by existing and new evidence developed to support Local Plan preparation by the boroughs and districts and the Surrey Infrastructure Study. It would also reflect the Coast to Capital and Enterprise M3 LEPs' strategic economic plans and take account of other wider relationships.
- 5.13 An Interim LSS was drafted collaboratively by the Surrey authorities alongside Surrey County Council and agreed by the Surrey Strategic Planning and Infrastructure Partnership in February 2018 following consultation with partners (see Appendix 2).
- 5.14 In recognition of changes to national planning policy since the LSS was originally proposed and LEPs being charged with preparing Local Industrial Strategies, it was agreed in June 2018 that Surrey Leaders and Chief Executives should develop a growth vision and strategy for Surrey as a whole to take forward the LSS into an agreed long term spatial strategy for Surrey (and sub-county areas), setting out key strategic opportunities, including infrastructure and economic priorities. An agreed shared vision and set of strategic priorities was seen as central to this and in July 2019 the Surrey Future Steering Board launched "Surrey's 2050 Place Ambition" to facilitate good growth.

Surrey Planning Officers Association

- 5.15 The Surrey Planning Officers Association (SPOA) consists of the lead / Chief Planning Officers from the Surrey districts and boroughs and officers from the County Council. Alongside Planning Working Group (see below), the SPOA provides a forum for information sharing and discussion on technical strategic matters relating to planning policy development in the context of national, strategic and local priorities.
- 5.16 Part of the SPOA's role is to lead on the day to day working on and implementation of Surrey's 2050 Place Ambition. This includes the commissioning of joint-evidence base work, liaising with stakeholders and drafting of documentation. Through the Chair, the SPOA reports to the Surrey Chief Executives and thereafter to the Joint Leaders Board. The SPOA also working closely with Planning Working Group to ensure strategic matters are addressed through the Local Plan process.

5.17 Meetings take place every quarter.

Surrey Planning Working Group

5.18 The Surrey Planning Working Group (PWG) is made up of the leading planning policy officers from all eleven district and borough councils and the County Council. The Group reports to the Surrey Planning Officers Association (SPOA) and provides a forum for information sharing and discussion on technical matters relating to planning policy development in the context of national, strategic and local priorities. In particular, the Group provides a forum through which strategic and cross boundary issues can be raised in relation to the Duty to Co-operate and taken forward to more senior groups where necessary.

5.19 The aims of the Surrey PWG are:

- To provide a forum for sharing general information and experience at senior level on policy issues.
- To develop best practice and initiate joint working to aid the process of preparing sub-regional and local policy documents.
- To ensure that policies take full account of the strategic and cross boundary issues arising from plan preparation and ensuring that these are addressed in the most appropriate manner as part of the Duty to Co-operate.
- To develop a Surrey-wide overview in response to consultations and review processes taking place at a national regional and local level.
- To maintain an information exchange and communication link with other relevant forums such as the Wider South East Officer Working Group.
- To keep abreast of and share information on issues and best practice outside Surrey, and on Policy development and implementation in such areas that will have an impact on Surrey.

5.20 Meetings are held every 2 months and are frequently attended by other duty-to-cooperate partners as a vital opportunity to discuss with all Surrey authorities on a single platform their emerging policies and programme and how these might fit / influence emerging Local Plans.

Kingston & North-East Surrey Housing Market Area Partnership

5.21 In light of the discussions amongst Surrey Leaders regarding a joint Local Strategic Statement (LSS) and the need to undertake a Strategic Housing Market Assessment (HMA) and seek to address housing need within the area, the council formed part of the Kingston & North-East Surrey Housing Market Area Partnership alongside Epsom & Ewell Borough Council, Mole Valley District Council and the Royal Brough of Kingston upon Thames.

5.22 The Partnership formed of officers from each authority has guided the completion of the SHMA and led on discussions regarding the level of housing need across the HMA / within their respective authority and the likelihood / strategies being explored as to

whether this could be met and opportunities for joint-working to address any potential unmet need.

- 5.23 The work on the SHMA has being guided by a joint Collaboration Agreement and fed-back into wider collaborative working and discussions concerning the drafting of the Local Plan.

Surrey Economic Development Officers Forum

- 5.24 Consisting of officers from the Surrey boroughs and districts and the County Council, alongside representatives from the Enterprise M3 and Coast to Capital LEPs and the Surrey Chamber of Commerce the group meets every quarter (as a minimum) to discuss and co-ordinate large strategic projects across the LEP areas / county. The Forum also acts as an opportunity to share information and key messages from Government and as respective councils' economic project lead into cross-boundary strategic projects such as the Surrey Economic Strategy, Surrey's 2050 Place Ambition, Local Industrial Strategies and Enterprise M3 Towns Analysis.

Elmbridge Local Committee

- 5.25 The Local Committee in Elmbridge is one of eleven established by Surrey County Council in April 2002 to bring its decision making closer to the local community and for borough and county Councillors to work in partnership. The local committee in Elmbridge is made up of nine County Councillors, representing each of the divisions within the Borough, and nine Borough Councillors. They meet every 3 months and together they discuss and make decisions on a range of local services including highways and transportation, social care, education and young people.

Surrey Energy and Sustainability Partnership

- 5.26 The Surrey Energy and Sustainability Partnership is a collaborative group involving the county council, all 11 borough and district councils, Surrey Police and Action Surrey. Membership consists of officers from Environmental, Housing and Planning Services, Public Health, Social Care and Schools.
- 5.27 The objectives of the Partnership include improving the energy efficiency of homes across Surrey; investigating opportunities for and enabling supply chains for local renewable resources; and understanding climate change impacts and improving climate change resilience. The officers' partnership group typically meets twice a year, to develop, commission, implement and govern partnership initiatives.
- 5.28 Surrey's Climate Change Strategy was published in 2020 which sets out how it will seek to meet its climate emergency declaration. It provides a joint framework for collaborative action on climate change across Surrey's local authorities and other partners. This was followed by a Delivery Plan 2021 to 2025 that sets out local authority priorities for the next 5-years.

Surrey Flood Risk Partnership Board

- 5.29 The Surrey Flood Risk Partnership Board is a group of representatives from several organisations and authorities that have responsibilities or interests regarding flood risk in Surrey. The Board and its associated operational Working Group aim to coordinate strategic flood risk management activities across the county, oversee cross-authority work and deliver the Surrey Flood Risk Management Strategy.
- 5.30 Both Board and Working Group meetings allow the opportunity for partners to co-operate and share plans, resources and information on all types of flood risk, and align priorities and investment. It is also a place for other more localised functional groups (e.g. planning, technical, resilience) to provide progress reports, seek direction or request resolution to policy concerns.
- 5.31 The council is a core member of the group alongside other Surrey district and borough councils, Surrey County Council, the Environment Agency, Thames Water and Surrey Fire & Rescue. The wider membership includes the Highways Agency, Network Rail, Surrey Police, Southern Water, the Surrey County Council Cabinet Member for Transport & Environment, UK Power Networks, the Upper Medway Internal Drainage Board, the National Trust and the Basingstoke Canal Authority.
- 5.32 The Board and Working Group meet quarterly.

The River Thames Scheme

- 5.33 Promoted by the Environment Agency, the River Thames Scheme will reduce flood risk to people living and working near the Thames, enhance the resilience of nationally important infrastructure, contribute to a vibrant local economy and maximise the social and environmental value of the river.
- 5.34 The scheme involves the building of a new flood channel alongside the River Thames to reduce flood risk to 15,000 properties and 2,4000 businesses in communities along the river including Weybridge, Molesey, and Thames Ditton. The channel will be built in 3 sections including the widening of the Desborough Cut (Elmbridge Borough) and increasing the capacity of the weir at Molesey (amongst others) by installing additional weir gates. Other benefits of the scheme include the increased resilience of the road, rail, power and water networks as well as the creation of 106 hectares of new public open space and 23 km of new pathways. Biodiversity for wildlife will also improve through the creation of 250 hectares of new habitat.
- 5.35 In response to flooding, flood risk and the River Thames Scheme a number of groups have been set up. The main groups are the Lower Thames Planning Officers Group, the Programme Board and a Consents & Authorisations Project Board. These groups comprise officers from the local authorities of Elmbridge, Kingston, Richmond, Runnymede, Spelthorne, Windsor & Maidenhead as well as Surrey County Council. In addition to the Environment Agency, the scheme is also being delivered in partnership with the Thames Valley Berkshire and Enterprise M3 LEAs, Thames Water, Thames Regional Flood and Coastal Committee (RFCC) and the Department for Environment Food and Rural Affairs (Defra).

5.36 The Programme Board has recently considered the preferred mechanism to gain planning consent for all aspects of the scheme and how local authorities across the Lower Thames can consistently reflect the RTS in their Local Plans. A Service Level Agreement (SLA) has been agreed detailing joint working.

Surrey Planning and Health Forum

5.37 The purpose of the group is to strengthen links across planning and health teams by providing a forum for health and planning officers to come together to:

- discuss planning and health infrastructure issues;
- maximise opportunities for health providers to influence Local Plans and draw on available funds (such as the Community Infrastructure Levy);
- help embed health and wellbeing into planning policies and decision;
- championing health and providing evidence for Local Plans in regard to health and wellbeing; and
- promote use of the Joint Strategic Needs Assessment, Health and Wellbeing Strategy, Health Intelligence and other health strategies as evidence for local planning.

5.38 Membership of the group consists of representatives from health and planning teams across Surrey (boroughs, districts and the county) as well as representatives from public health, local Integrated Commissioning Systems and Integrated Care Partnerships. Meetings take place quarterly, are hosted by Surrey County Council and chaired by Public Health.

Thames Basin Heaths (SPA) – the Joint Strategic Partnership

5.39 Alongside 10 other boroughs and districts effected by the Thames Basin Heaths SPA, the council is a member of the Joint Strategic Partnership. The local authorities are acting together in accordance with their powers under S2(1) of the Local Government Act 2000 to promote the environmental well-being of their areas. The Board is advised by several bodies including Natural England who have an interest in the Thames Basin Heaths SPA by virtue of a managerial / landownership responsibility or technical advisory role.

5.40 The Joint Strategic Partnership comprises the following groups:

- The Joint Strategic Partnership (JSP) Board
- The Strategic Access Management and Monitoring (SAMM) Project Board
- The Thames Basin Heaths (TBH) Officer Group; and
- The Access Management and Monitoring Partnership (AMMP).

The Joint Strategic Partnership Board

5.41 The JSP Board acts as an advisory body for local planning authorities affected by the Thames Basin Heaths SPA. The councils' Portfolio Holder for Planning Services is a member of the Board which acts as a vehicle for joint working, liaison and exchange of information related to the SPA. Meetings of the JSP Board are held two times per year,

or more if required.

The Strategic Access Management and Monitoring Project Board

- 5.42 The SAMM Project Board is appointed by the JSP Board to make recommendations in relation to the implementation of the TBH Strategic Access Management and Monitoring project and oversee day to day management and implementation of the project. The Project Board acts to support and advise the TBH Project Coordinator in taking decisions and ensuring the SAMM project progresses through open partnership discussions and solution-finding.

The Thames Basin Heaths Officer Group

- 5.43 The group provides a forum for officers to discuss and share information about Thames Basin Heaths' policies and implementation issues, including local authority policy/avoidance strategies, the coordinated provision of SANG and the implementation of the SAMM project. The group meets two times per year, or more as required.

The Access Management and Monitoring Partnership

- 5.44 The Access Management and Monitoring Partnership has been established to provide advice about strategic access management and monitoring measures and provide for the implementation of those measures. Membership of the AMMP comprises local authority officers and stakeholder representatives with land management responsibilities and/or landowning interests.

Thames Landscape Strategy Partnership

- 5.45 The Thames Landscape Strategy Partnership brings together 14 funding partners which seek to conserve and promote the special character of the river corridor between Weybridge, Hampton and Kew. The Partnership is governed by an Executive Review Board which meets four times a year, plus one annual meeting, to provide strategic guidance. Local Councillors, landowners, business and the community are represented on the Group.
- 5.46 There is also an Officer Steering Committee which meets twice a year. It consists of senior Local Authority officers and representatives from the National Agencies. Officers work in partnership to develop projects and strategic policy.

Heathrow – Officer and Member Groups

- 5.47 As set out in the previous section of this Statement, the Heathrow Strategic Planning Group (HSPG) was established in late 2015 with the understanding that collaborative working would lead to greater understanding and influence over the potential impact of airport expansion on the wider area and help authorities to minimise the potential harmful impacts and maximise the potential benefits of expansion through joint representation to Government, Heathrow Airport Limited and other key stakeholders.
- 5.48 There are two regular officer group meetings. A Chief Officers Group attended by

Chief Executives or nominees to give strategic direction to support the Leaders Board (established in October 2017) which meets quarterly and, a monthly Officers Group which essentially steers the work of Heathrow Strategic Planning Group (HSPG) day to day, attended by senior officers of the member organisations, generally the lead officers responsible for dealing with the Heathrow matters proposals on behalf of their organisation, and observers from key stakeholders such as Department for Transport (DfT) and Highways England.

- 5.49 In addition, specialist sub-groups meet from time to time focusing on a range of technical aspects, including: Transport, Spatial Planning, Environment - Natural Environment, Environment - Public Health, and Business and Economy; these are attended by specialist lead technical officers from the council and other member groups. HSPG also holds Summit meetings, inviting all HSPG members but also neighbouring local authorities and a wide range of other stakeholders potentially impacted by Heathrow airport, to consider key pressing strategic issues and to update attendees on the work of the Group.
- 5.50 The Accord for the Group was first published in October 2017 (updated in 2018 due to increased Membership). However, in July 2020 a new Accord was agreed for the period 2020/21. This steers the work of the Group towards the recovery from the Covid-19 pandemic and economic downturn, to ensure local communities and businesses reliant on the airport can quickly get back on their feet, whilst ensuring a better environment is also created. The Accord also focuses on a 'green recovery' for the airport.

Regulation 18 Consultations

- 5.51 In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the council has undertaken early engagement / consultation with specific consultation bodies that it considers may have an interest in the subject of the new Local Plan; general consultation bodies that it considers appropriate and; residents and other persons carrying on business in the area for which it considers it appropriate to invite representations.
- 5.52 The council has undertaken three Regulation 18 Consultations:
- Strategic Options Consultation 2016/17
 - Options Consultation 2019
 - Vision, objectives and direction for the development management policies consultation (2020)
- 5.53 More information on each consultation undertaken including who was consulted and the responses received, can be found in the relevant Consultation Statements published following consideration of the comments / representations made at each stage. Further details of the responses received from Strategic Partners to relevant Strategic Matters has been set out in Section 6 of this Statement. Furthermore, as a summary, Appendix 3 sets out for each of the Regulation 18 consultations those Strategic Partners who responded.

Bespoke Engagement

- 5.54 In addition, to more formal collaborative working arrangements and consultations set out above, the council has, as and when appropriate, undertaken more bespoke engagement with other local planning authorities including Surrey County Council; infrastructure partners and statutory consultees such as the Environment Agency; National Highways and Natural England. This includes discussions on the evidence base as it has emerged to ensure they are satisfied with the approach being taken by the council to identified Strategic Matters and how this has informed the draft Local Plan.
- 5.55 Details of relevant activities are set out under each Strategic Matter within Section 6 of this Statement.

6. Addressing the Strategic Priorities & Matters

Discharging the Duty

- 6.1 This section sets out how the council has sought to address the Strategic Priorities listed in NPPF (paragraph 20) and the Strategic Matters that have been identified from these which are specific issues for the Elmbridge Local Plan (as set out in Section 4 of this Statement) in cooperation with its Strategic Partners.
- 6.2 Representations submitted on the draft Local Plan (Regulation 19) may present additional Strategic Priorities / Matters or resolve any issues that remain outstanding at the time of drafting this Statement. In such cases, the council will update this Statement prior to the submission of the draft Local Plan to the Secretary of State for Examination in Public (EiP) alongside the accompanying Statements of Common Ground.
- 6.3 Throughout this Section, various Local Plan evidence base documents and other strategies / documentation is referred to. The council's evidence base has been published in support of the draft Local Plan on its website. Where certain documentation is not publicly available and / or is particularly pertinent to the Strategic Matter, this has been appended to this Statement.
- 6.4 In terms of the Local Plan evidence base documents referenced below, in most instances, the most up to date version is referred to. It is important to note however, that as the preparation of the draft Local Plan has been an iterative process and it is important to have an up to date evidence base, earlier versions of some documents exist. It is also important to note that it was often the case that engagement with Strategic Partners took place 'up-front' as part of the preparation of the earlier evidence base documents and therefore, where relevant this work has been referenced throughout this Section.
- 6.5 For each of the Strategic Matters the information has been presented consistently and sets out:
- the Strategic Priority and Matter including a summary of the planning issue that the council needs to address in its Local Plan;
 - the Strategic Partners that the council has engaged with to address the Strategic Priority / Matter;
 - the evidence base documents prepared to inform the Strategic Matter, and which have formed the basis of discussions with Strategic Partners and the policies contained within the draft Local Plan (unless stated otherwise, these have prepared for / by the council);

- the Actions understand in cooperation with our Strategic Partners to understand and address the Strategic Priority / Matter;
- a summary of the formal Regulation 18 Consultation responses received from the Strategic Partners in regard to the Strategic Matter;
- the Key Outcomes from the Strategic Partners from the Actions in regard to each Strategic Matter;
- how the Actions and Key Outcomes have been reflected in the draft Local Plan with specific reference to policies; and
- On-going activities / cooperation which is taking place in regard to each Strategic Matter.

Sustainability Appraisal (SA) & Strategic Environmental Impact Assessment (SEA)

- 6.6 As part of the preparation of the draft Local Plan, the council has prepared the required SA/SEA reports at each stage of the process and engaged with the Statutory Consultees on an on-going basis. To avoid repetition and setting out these details on each of the relevant Strategic Matters, this information has been presented below.
- 6.7 Engagement with the Strategic Partners (Environment Agency, Historic England and Natural England) has taken place at the following formal stages:
- The Sustainability Appraisal Scoping Report and Initial Assessment (2016/17) in support of the Regulation 18 Strategic Options Consultation
 - The Sustainability Appraisal of the Regulation 18 Options Consultation (2019)
 - The Sustainability Appraisal of the Regulation 18 Vision and Development Management Policies Consultation (2020)
 - The Scoping Report Review (review of the 2016/17 report) (August 2020)
- 6.8 In response to these engagement activities, generic guidance has been provided. This includes selecting the relevant plans, programmes and policies, baseline information, sources of information, sustainability issues, the SA framework, SA / SEA objectives, decision making criteria and objectives and indicators.
- 6.9 More fundamentally, the council has ensured that in response to the advice received from the Strategic Consultees, that the SA assesses the accumulative impacts of the draft Local Plan policies and allocations and sets out a comprehensive monitoring framework.
- 6.10 In support of the draft Local Plan, the council will engage the Statutory Consultees on the SA for the draft Local Plan (including SEA). Comments received will be utilised to propose any minor modifications to the Plan when submitted for Examination.

Strategic Priority A) Housing (including affordable housing), employment and retail, leisure and other commercial development

Strategic Matter 1: Housing (including affordable housing)

Category	Details
Strategic Planning Issue:	Assessing and meeting housing need - Setting the scale, distribution and location of housing development across Elmbridge and neighbouring authorities
Strategic Partners:	<ul style="list-style-type: none"> • Epsom & Ewell Borough Council (EEBC) • Greater London Authority (GLA) • Guildford Borough Council (GBC) • London Borough of Richmond upon Thames (LBR) • Mole Valley District Council (MVDC) • Reigate & Banstead Borough Council (RBBC) • Royal Borough of Kingston upon Thames (RBK) • Runnymede Borough Council (RBC) • Spelthorne Borough Council (SBC) • Surrey County Council (SCC) • Surrey Heath Borough Council (SHBC) • Tandridge District Council (TDC) • Woking Borough Council (WBC) • All local planning authorities in the wider South-East region • Homes & Communities Agency (Homes England) • M3 Local Enterprise Partnership • Surrey Futures Board
Key Evidence Base:	<ul style="list-style-type: none"> • Kingston & North East Surrey Strategic Housing Market Assessment (2016) • Alternative Development Options (2016) • Review of Absolute Constraints (2016, 2019, 2021) • Green Belt Boundary Review (2016) • Urban Capacity Study (2018) • Green Belt Boundary Review Supplementary Work - (2018) • Density Study (2019) • Assessment of Local Housing Need (2020) & Addendum (2021) • Land Availability Assessment (2022) • How the Spatial Strategy was Formed (2022) • SA/SEA • Surrey's 2050 Place Ambition

This section is set out as follows:

- 1. Establishing the Housing Market Area (HMA) (2014 – 2015)**
- 2. Identification of Housing Need / Local Housing Need Figure (2016 – 2022)**
- 3. Working with Housing Market Area (HMA) Partners to address housing need (2014 – present)**
 - Early Evidence Base – Engaging HMA Partners (2014 - 2015)
 - Elmbridge Local Plan: Strategic Options Consultation (2016/17)
 - Further Evidence Base – Engaging HMA Partners (2017 - 2019)
 - HMA Partner Meetings (2017 – 2019)
 - Elmbridge Local Plan: Options Consultation (2019)
 - Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)
 - HMA Partner Meetings (2020 – 2022)
 - HMA Partners current Local Plan positions & responding to their Local Plan consultations
 - Summary: Can Elmbridge’s unmet housing need be met within the wider HMA?
 - On-going joint working

4. Working with neighbouring Local Planning Authorities outside of the HMA

- Guildford Borough Council
- Woking Borough Council
- Runnymede Borough Council
- Spelthorne Borough Council
- London Borough of Richmond upon Thames

For each of the above authorities this section sets out:

- Their Local Plan positions
- Their response to the council’s engagement on its Local Plan Evidence Base
- Their responses to the council’s enquiries as to whether they can assist in meeting Elmbridge’s housing need
- Details of joint meetings
- A summary of joint-working and engagement
- Details of on-going joint working

A Summary of whether Elmbridge’s unmet housing need can be met by neighbouring LPAs is then provided.

- 5. Working with other Surrey Authorities as a collective and other Partners (2013 – to current)**
 - Surrey Local Strategic Statement
 - Surrey 2050 Place Ambition
- 6. Engagement with Local Planning Authorities in the South East (2020 and 2021)**
- 7. Summary: Strategic Matter 1 – Housing**

Actions:

1. Establishing the Housing Market Area (HMA) (2014 – 2015)

In response to paragraph 47 of the 2012 NPPF and considering discussions amongst Surrey Leaders regarding a joint Local Strategy Statement (LSS), in 2014/15 the council set out to understand its Housing Market Area (HMA) and the basis upon which a Strategic Housing Market Assessment (SHMA) should be undertaken.

At the same time the council was approached by the Royal Borough of Kingston upon Thames (July 2014) to discuss the opportunity of exploring a local sub-market SHMA or SHMAs covering the North West Surrey / South West London area. The council responded positively to the approach from the Royal Borough of Kingston upon Thames (RBK) with Epsom & Ewell Borough Council (EEBC) and the London Boroughs of Merton and Richmond upon Thames (LBR) also expressing interest in potential joint working. It was also agreed that Mole Valley District Council (MVDC) would be engaged due to the linkages with Kingston, Elmbridge, Epsom & Ewell.

Regarding neighbouring Surrey authorities, it was noted that Guildford, Woking and Waverley Borough Councils were in the process of preparing a joint West Surrey SHMA and Runnymede and Spelthorne Borough Councils were also undertaking joint work on the strategic matter. Regarding other neighbouring London Boroughs, it was noted that Sutton and Wandsworth were in the process of preparing their own SHMAs and did not express an interest in joint working.

During the period September 2014 to March 2015, several meetings took place amongst officers from Elmbridge, Epsom & Ewell, Mole Valley, the London Boroughs of Merton and Richmond and the Royal Borough of Kingston upon Thames to discuss a joint-SHMA. At different stages in this period, the London Boroughs of Merton and Richmond upon Thames withdraw from discussions and the opportunity of joint working.

This resulted in the SHMA being commissioned for the Kingston & North-East Surrey HMA consisting of:

- Elmbridge Borough Council
- Epsom & Ewell Borough Council
- Mole Valley District Council
- Royal Borough of Kingston upon Thames

During June and July 2015, the HMA Partners engaged with other neighbouring authorities and Stakeholders (including for example, Surrey County Council (SCC); Greater London Authority (GLA) and appropriate Local Economic Partnerships (LEPs)) on the soundness of the HMA) (see Appendix 4). There were no objections to the proposed HMA however, queries regarding the exclusion of Richmond upon Thames were raised. In response, the LBR provided additional information demonstrating that they shared several linkages and characteristics with the proposed HMA but had more connections with inner London Boroughs including Wandsworth and therefore remained outside of the identified HMA.

The four HMA authorities were confident with the HMA identified i.e. that they formed a coherent and self-contained HMA as identified from strong migration linkages and supported by evidence of house price patterns and commuting links. A SHMA therefore proceeded on this basis with planning and housing officers from each of the four authorities forming a Steering Group guided by a Collaboration Agreement.

2. Identification of Housing Need / Local Housing Need Figure (2016 – 2022)

During the preparation of the SHMA neighbouring authorities and other Stakeholder were involved in its preparation. An important element of the SHMA was the canvassing of views of relevant stakeholders on the current state of the housing market; possible changes in the future; and key issues around housing supply, demand and need for both affordable and market housing. As part of the preparation of the SHMA, 24 stakeholders' interviews were undertaken including 18 with neighbouring local authorities to one or more of the HMA Partners.

Between September 2015 and March 2016 several Steering Group meetings took place as well as informal discussions to agree the assumptions made within the report; the draft report and the final report. The final report was dated June 2016.

The conclusion of the SHMA was the need for 40,005 additional homes across the HMA area between 2015 and 2035 (circ. 2,000 homes per annum). The identified OAHN for each of the HMA partners was:

- Elmbridge – 9,480 dwellings (474 dwellings per annum (dpa))
- Epsom & Ewell – 8,352 dwellings (418 dpa)
- Mole Valley – 7,814 dwellings (391 dpa)
- Kingston – 14,348 dwellings (717 dpa)

Following the publication of the SHMA in 2016, the Government has introduced the Standard Methodology for calculating Local Housing Need and, the GLA has published the London Plan 2021 which sets housing targets for individual London Boroughs over a 10-year period (2019/20 – 2028/29).

As the Standard Methodology has been updated with changes to affordability ratio for example, the Local Housing Need figures for LPAs have evolved across the period of the preparation of the Local Plan. As at 23 March 2022, the Local Housing Need figures for the Surrey HMA Partners arising from the Standard Methodology (for a 15-year period) and for RBK as set by London Plan (for a 10-year period 2019/20 – 2028/28) are:

- Elmbridge – 9,705 dwellings (647 dpa)
- Epsom & Ewell – 8,640 dwellings (576 dpa)
- Mole Valley – 6,870 dwellings (458 dpa)
- Kingston – 9,640 dwellings (964 dwellings)

3. Working with Housing Market Area (HMA) Partners to address housing need (2014 – present)

Following the completion of the SHMA, several Steering Group Meetings were held as well as informal discussion at meetings of the Surrey Leaders (as part of the preparation

of the LSS, Surrey Planning Officers Association (SPOA) and Planning Working Group (PWG) to seek options for addressing the level of housing need identified in the HMA and across wider LPA areas.

For one HMA Partners Steering Group Meeting, Councillors with the responsibility for the Local Plan also attended to ensure that they were aware of the responsibilities placed upon authorities to address housing need collectively under the duty to cooperate and to agree a way forward.

The outcome of the series of meetings was that each authority would assess its ability to meet its identified housing need engaging its partner authorities in the process to ensure a consistent approach was taken and that on-going discussions would continue regarding any potential unmet need and the opportunities for other authorities to assist in meeting any residual need if necessary.

Early Evidence Base – Engaging HMA Partners (2014 - 2015)

Prior to the completion of the SHMA and as part of its initial evidence base preparation, the council had already commenced several key evidence base studies to understand its potential housing land supply and potential constraints within the borough to meetings its identified housing need. At this stage in the process, this work consisted of three key documents:

- Land Availability Study (2016)
- Absolute Constraints Study (2016)
- Green Belt Boundary Review (2016)

As part of the Green Belt Boundary Review (2016) the council engaged its HMA Partners in November 2014 to see if there was interest in commissioning a joint study. None of the HMA Partners took up the opportunity.

As shown in Appendix 5, the council consulted on the draft methodologies for each of the above documents. In regard to the Green Belt Boundary Review, the council also held a workshop in May 2015 and consultation on the draft assessment for Local Areas that crossed LPA boundaries and the draft report.

Both MVDC and RBK responded to the consultation on the draft methodology for the LAA. RBK considered the proposed approach generally sound but queried whether previously developed land in the Green Belt should be considered as an option for meeting development need. MVDC raised concern that the draft LAA methodology suggested a commitment to formal joint working on the LAA and sought clarification that the latest East-Surrey agreed Sustainability Appraisal Objectives were being used to assess sites.

Responses were received from EEBC and MDVC on the draft Absolute Constraints Study. MVDC confirmed it had no objection to the list of absolute constraints identified and noted that other constraints would be considered as part of the site assessment process. EEBC noted the purpose of the study and the absolute constraints identified agreeing that they would fit this description. EEBC also welcomed further consultation on the methodology which would identify the policy constraints to form the basis of the 'further assessment' of

any parcels of the Green Belt which have been identified as having the potential for future development.

All HMA Partners attended the council's workshop on the Green Belt Boundary Review on the draft methodology in May 2015 (host by the council's consultant Arup) and responded to the formal consultation. In addition, MVDC responded to the consultation on the assessment of the Local Areas that crossed into their LPA area. This consultation was not relevant to EEBC as they do not adjoin Elmbridge Borough. RBK did not respond. MVDC and RBK responded to the consultation on the draft report. EEBC was also consulted but no response was received.

In response to the consultation on the draft methodology, the responses from officers at EEBC stated they were broadly supportive of the approach taken to assess the Green Belt in Elmbridge and the methodology used. In general terms, they supported the approach taken in identifying both local Green Belt land parcels and larger strategic swathes of Green Belt for assessment. Officers from MVDC in their response stated that the boundaries of three Local Areas should be redrawn to exclude land within Mole Valley District and queried where some settlements in Mole Valley featured in the settlement hierarchy for the assessment of Purpose 1 and 2. Officers from RBK in their response requested amendments to the text which implied that the Review would have implications for other LPAs and also clarification as to how distances would be used to distinguish between gaps between settlements in the assessment. RBK agreed with the identification of the settlements in the hierarchy for the purpose of the assessment.

MVDC's response to the consultation on the Local Areas that crossed into their borough again queried whether some settlements within Mole Valley District should be considered as Larger Built Up Areas.

In response to the draft Green Belt Boundary Review report (2016), both MVDC and RBK raised concerns regarding the Local Areas and their assessments which crossed into their respective district / borough. There was also concern as to how the assessment could imply that development was set to take place within their areas.

How the council responded to all comments summarised above, in regarding to the:

- Draft methodology for the Absolute Constraints Assessment (2015) is set out in Appendix 6.
- Draft methodology for the Green Belt Boundary Review (2016) is set out in Appendix 7.
- Focused consultation on the Local Areas Assessments (Green Belt Boundary Review 2016) is set out in Appendix 8.
- Draft report for the Green Belt Boundary Review (2016) is set out in Appendix 9.

Elmbridge Local Plan: Strategic Options Consultation (2016/17)

The outcomes of the initial evidence base work culminating in the Local Plan: Strategic Options Consultation (2016/17). This presented 3 Options for how the council could seek to meet its housing need including working with neighbouring authorities as part of the duty to see if any unmet housing need arising in Elmbridge Borough could be met elsewhere. The council did not specify whether this was within the HMA as, its HMA

Partners were still assessing their own abilities to accommodate their identified housing need as well as the potential to meet any arising from the wider-HMA.

In response to the consultation, EEBC replied that like Elmbridge Borough, Epsom & Ewell is a tightly constrained area and shared the challenges of responding to a significant housing figure identified by the jointly prepared SHMA. The response highlighted that a partial review of the spatial strategy was underway with additional evidence base work but that the initial outcome of this evidence gathering was that it was extremely unlikely there will be any scope to accommodate a shortfall in housing need arising from neighbouring authorities and those within the HMA.

In their response to the consultation, MVDC acknowledged that Option 2 struck a balance between meeting need in the urban area and the protection of Green Belt however, that Option 2 would impact on the council's ability to meet housing need in full. Their response acknowledged that the two authorities were in the same HMA with similar challenges in terms of Green Belt and other restrictive designations that would mean there was every prospect Mole Valley would also be unable to meet its own OAHN in full and will also be exploring cross-boundary options under the duty.

The RBK strongly objected to the identification of land at Long Ditton as a Key Strategic Area. It was also noted that Option 2 relied on meeting some unmet housing need outside the borough's boundary although the consultation did not state how big the shortfall was or where this might be addressed. RBK requested that discussions be on-going and that it would be useful to discuss options for meeting need once their own initial consultation (April – May 2017) was completed and the responses considered.

Further Evidence Base – Engaging HMA Partners (2017 - 2019)

During the Local Plan: Strategic Options Consultation (2016/17), the Government published its White Paper: Fixing our broken housing market (February 2017). This introduced the concept of a Standard Methodology for establishing housing need. This was subsequently consulted upon in September 2017 as part of the Government's 'Planning for the right homes in the right places' paper.

Due to these fundamental changes in the way in which LPAs established their housing needs figures, the council 'paused' the preparation of its Local Plan and waited for the Standard Methodology figures to be published in order to ensure that its plan-preparation remained consistent with the NPPF.

During this period, the RBK notified the Surrey Authorities of their intention to use the emerging London Plan target as their identified housing need as opposed to the figures from the SHMA / emerging Standard Method and that their engagement activities regarding unmet need would be geared towards London Boroughs as opposed to the Kingston & North-East Surrey SHMA.

Nevertheless, when undertaking additional evidence base work to inform the next Local Plan consultation, the council continued to engage all HMA Partners. Key evidence base documents prepared and consulted on during this period (2017 – 2019) to help the council

understand its potential housing land supply and potential constraints within the borough to meetings its identified housing need (as set by the Standard Methodology) were:

- Urban Capacity Study (2018)
- Green Belt Boundary Review – Supplementary Work (2018)

During this time, the council also update the LAA (2018) but did not reconsult on the methodology as this was principally the same as that consulted on in 2016. As shown in Appendix 5, the council consulted on the draft methodologies for each of the above documents.

Only EEBC responded to the consultation in November 2017 on the draft methodology for the Urban Capacity Study (UCS). Their responses expressed support for the approach being taken and commended Elmbridge's clear efforts in searching under every stone to meet the Housing Market Area's Objectively Assessed Housing Needs figure. The approach to considering market signals was also welcomed and consultation with the development industry. It was suggested that the council, in considering development typologies and densities should look to examples outside of the borough that make the most efficient use of housing land.

All HMA Partners responded to the consultation on the draft UCS report. In their response, RBK noted the challenge Elmbridge faces in respect of meeting housing need and that Kingston faces similar challenges, although RBK was not as advanced in the preparation of their Local Plan as the council.

MVDC's response stated they were supportive of the methodical approach taken in the UCS and the recognition that Elmbridge must make best use of its defined urban areas to help meet its own housing need. It was stated that having identified an initial potential capacity of each site, EBC should establish the true capacity of each potential development site based on the individual characteristics of each site rather than using blanket densities across predefined urban areas.

EEBC's responses highlighted that the purpose of the study was clear, and it had appeared to have met its objective of finding further opportunities for housing within the urban area. The responses stated that as the availability of most sites was unknown, it was correct to not include them in the 5-year housing land supply calculation. Regarding a 5-year housing land supply, the responses stated that achieving this was a challenge shared by EEBC. Similar to MVDC's response, it was suggested that more precise densities / capacities could be considered and be more ambitious.

Regarding the Green Belt Boundary Review – Supplementary Work (2018) the council received comments from RBK and EEBC on the draft methodology.

In their response, EEBC expressed their support for the approach being taken and commended Elmbridge's clear efforts in preparing a detailed evidence base to inform the development of a sustainable strategy which would respond positively to the housing need. No specific comments were made on the methodology however, EEBC noted that Green Belt would play an important role within the wider iterative evidence base and the

outcomes of which would require the careful balancing of the social, environmental and economic advantages and disadvantages to bring forward a sustainable growth strategy to underpin the Local Plan.

In their response, RBK made no comments on the methodology but noted that the parcel partially within Kingston appears to be subject to further assessment and reserved the right to make further comments on the findings of the supplementary work. RBK made their position clear in that whilst they consider it appropriate that the land is assessed in terms of the wider parcel, it is not appropriate for the work to recommend what approach should be taken to any land in the Green Belt that is not within Elmbridge borough.

EBC consulted all HMA Partners on the draft Green Belt Boundary Review – Supplementary Work however, no responses were received.

How the council responded to comments received on the draft methodology for the Green Belt Boundary Review – Supplementary Work (2018) is set out in Appendix 10. In terms of the UCS and the comments made by EEBC and MVDC regarding densities / capacities of sites, there were considered by EBC and addressed by the council when preparing the LAA 2021 which considered the capacity of each site on a site by site basis.

HMA Partner Meetings (2017 – 2019)

Following previous HMA Partner meetings and coinciding with consultation on the emerging evidence base (as set out above), during the period 2017 – 2019, the council continued to meet with its HMA Partners to discuss our respective emerging Local Plans and the issue of (potential) unmet housing need.

Meeting dates including key points of discussion and outcomes are set out below:

- **July 2017** – Attended by all HMA Partners, discussions took place relating to recent Local Plan examinations and how the duty to cooperate was being used elsewhere to address unmet housing need. Each LPA provided an update on their Local Plan position including evidence base work underway.

Key outcomes for the meeting were:

- Confirmation from RBK that they would not be using the SHMA housing need figure but that identified in the emerging London Plan (further alternations to the London Plan).
- The likely scale of unmet housing need across the HMA based on the current evidence base.
- The need to the next meeting to include more Senior Officers.
- A Position Paper (dated 8 September 2017) produced by EEBC setting out the key issues identified about to be discussed at the next meeting.

- **14 September 2017** – Attended by all HMA Partners including more Senior Officers, discussions focused on the issues raised in the Position Paper produced and circulated by EEBC including a discussion on the options for moving forward. Key outcomes for the meeting were:
 - Each LPA would continue with its evidence base preparation and the consideration of options for meeting its development need;
 - To continue to update HMA Partners on a picture of (potential) unmet need until a complete picture for the HMA was formed allowing for discussions on a potential solution; and
 - A meeting to be arranged with the GLA to discuss the Mayors’ approach to the duty to cooperate and working with authorities outside of London on the wider issue of housing need.

- **9 February 2018** – Meeting with the GLA and the Surrey HMA Partners at which the latest position of respective plans and the GLA’s use of its own household projections to calculate housing need were discussed. During the meeting it was queried whether any oversupply of housing (above its target) in RBK could be shared between the GLA and East Surrey. During the meeting officers from the GLA noted that RBK formed part of the Kingston & North-East Surrey HMA and acknowledged there could be merit in Surrey authorities seeking to share in any over delivery in Kingston above its London Plan target. However, this point was not agreed by the GLA officers when agreeing the final minutes from the meeting.

Key outcomes for the meeting were:

- An understanding on the Mayors’ position on Green Belt both within the GLA boundaries and outside;
 - To prepare and agree a memorandum of understanding (or something of that order) that states that HMA Partners are engaging and co-operating with the GLA on strategic planning issues and HMA partners to respond to the draft London Plan.
 - That the four authorities would agree to share data and information that can positively inform the place-making processes for which they are responsible. In particular, data relating to population projections, migration and economic development was considered useful to all assembled.
- **3 December 2019** – Meeting with LBK to discuss latest Local Plan positions including the on-going consideration / assessment of larger sites on our shared boundary. Update on timetables and discussion on cross – boundary strategic planning matters.

Key outcome for the meeting were:

- LBK stated that some options being considered would meet development need and potentially exceed the target set by the emerging London Plan. EBC stated that based on the Kingston & North-Surrey HMA, if this were the case, EBC would continue to argue that some oversupply should count towards meeting the (potential) unmet housing need of the Surrey HMA Partners.

Elmbridge Local Plan: Options Consultation (2019)

The outcomes of the further evidence base work and discussions with HMA Partners culminating in the Local Plan: Options Consultation (2019). This presented 5 Options for how the council could seek to meet its housing need including continued working with neighbouring authorities as part of the duty to see if any unmet housing need arising in Elmbridge Borough could be met elsewhere.

Following informal discussions at SPOA and PWG, in their response EEBC stated that the two councils face similar challenges of meeting growth; a significantly increasing housing requirement but with even less available land. EEBC commended the council for considering options that would meet and exceed the level of housing need required and welcomed the council demonstrating that it had considered all options for accommodating future growth. EEBC broadly supported the Options that sought to meet development need (Options 3 & 5) which both included the potential use of land currently designated as Green Belt to meet development need to varying extents. The response concluded by welcoming the council's on-going work to addressing need and acknowledged previous joint working through the SHMA.

MVDC expressed concern in their response that any Option that resulted in an unmet need may put pressure on this being met outside of the borough including in authority areas such as Mole Valley. Their response stated that MVDC was in the process of drafting their Local Plan but that with similar and additional constraints to meeting need as experienced in Elmbridge, this was going to be difficult. It was stated that meeting any unmet need of other authorities would therefore be difficult also.

In their response, RBK raised concerns regarding any option that would result in large scale development on the boundaries of the two boroughs and highlighted the need for exceptional circumstances to be demonstrated when considering Green Belt. RBK welcomed further discussions on how our authorities could meet development need in a way which accords with the general principles of sustainable development.

Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

In January 2020, the council undertook the above consultation. All HMA Partners were consulted with EEBC & MVDC responding.

In their response, EEBC noted the current consultation did not offer a preferred approach or strategy for delivering future growth and expressed concern that not knowing this and advancing straight to a draft Local Plan may not allow sufficient time to address cross-boundary strategic matters. It was highlighted that EEBC continues to explore options for how it can meet its own housing need, stating that this will be challenging and as such, supporting neighbouring authorities by meeting any of their unmet need is not a deliverable option / they have no capacity to assist.

MVDC stated that the two councils face a similar level of constraints in terms of the high percentage of the areas designated as Green Belt and/or covered by other designations which require that development is restricted.

HMA Partner Meetings (2020 – 2022)

Following previous HMA Partner meetings and coinciding with consultation on the emerging evidence base (as set out above) and the further Regulation 18 consultations, during the period 2020 – 2022, the council continued to meet with its HMA Partners to discuss our respective emerging Local Plans and the issue of (potential) unmet housing need.

Key meeting dates and other activities including key points of discussion and outcomes are set out below:

- **27 January 2020** – EBC writes to MVDC and EEBC (and other LPAs in the South East, see Appendix 11 for further details) enquiring as to whether they would be able to assist the council meeting any (potential) unmet housing need. Both LPAs responded.

In their response dated **6 March 2020**, EEBC stated:

“...it is important that Elmbridge Borough Council are fully aware that Epsom & Ewell does not have the capacity to accommodate any additional housing need that cannot be met within your Borough. You will appreciate that Epsom & Ewell is currently working on its own new Local Plan. Our evidence demonstrates that meeting our own objectively assessed housing need (set by the national standard method) will be challenging and as such supporting our neighbours by meeting any of their external unmet need is not a deliverable option”.

In their responses dated **25 February 2020**, MVDC stated:

“Overall, and as you suggest in your letter, I believe MVDC and EBC are in a very similar position in terms of responding positively to the challenge of addressing housing need. Therefore, MVDC is not in a position to assist EBC in meeting the borough’s unmet housing need”.

- **2 July 2020** – Surrey HMA Partners. MVDC provided an update as to its growth strategy. The most recent Regulation 18 consultation stated that MVDC were looking to meet need as Councillors believed that this was the only position available. However, whilst MVDC were not looking to move away from the Standard Method, a review of the evidence base was taking place to see what changes could be made to the housing target. MVDC confirmed that they were updating their section of the SHMA looking at a breakdown of the Standard Method figure in terms of typologies – type, size and tenure.

EBC officers confirmed that the council had just completed a similar exercise in regard to updating the SHMA. This was taking place in the form of the Local Housing Needs Assessment and neighbouring LPAs were interviewed as part of this work. It was noted that the updated evidence base and on-going duty to cooperate discussions were beings used to refine the options as part of the council’s consideration of its preferred spatial strategy.

EEBC stated that they were looking to meet their housing need based on the Standard Method. EBC said that, from discussions with previous EEBC officers, it was

understood that a push for growth and seeking to create a vibrant borough for a younger and up-coming demographic had been the preferred growth strategy. It was queried whether this was still the case. EEBC confirmed that this was one of point being discussed with Councillors over the summer to plan their way forward.

There was a consensus amongst officers that collectively the boroughs and district should seek the opportunity to meet with the new Chief Planning Officer at MHCLG (as developers had been) to have a general discussion re. the household projections and their implications.

EEBC said that this needed to be a pro-active / positive approach to show the boroughs and district are seeking clarification so as to not delay Local Plans as opposed to continuing to challenge housing numbers. It was also agreed that a draft SoCGs should be ready for when the first council holds its Regulation 19 Draft Plan representation period.

The Surrey Authorities agreed to invite RBK to the next meeting to see if their position re. working with the Surrey HMA had changed or whether they continued to focus their duty to cooperate activities within the GLA boundary.

- **1 September 2020** – a joint letter from the Surrey HMA Partners was sent to the Interim Chief Planning Officer at the Ministry of Housing, Communities & Local Government (MHCLG) concerning our respective Local Plan positions, proposed changes to the Standard Methodology, and the potential implication of the changes on our respective Local Plan positions.

The three authorities asked that the Government provide a clear and speedy direction to LPAs to prevent slippage in Local Plan timetables; there was a shared concern that any changes to how housing numbers are derived would require further investigation, causing further delay to preparation of Local Plans in North East Surrey. A meeting with MHCLG representatives was suggested as beneficial for all. No response to the letter was received.

- **14 October 2020** – Meeting of HMA Partners. All LPAs provided an update on their Local Plan position including evidence base documents and spatial strategy options being considered / potential for unmet housing need. Also discussed were the implications of the proposed changes to the Standard Methodology and Response to the White Paper and whether each LPA was delaying their Local Plan preparation. The approach to the requirement for a SoCGs was discussed and the options available e.g. one principal SoCGs for the HMA or multiple between LPAs.
- **29 October 2020** – Meeting of HMA Partners. MVDC produced a 'matrix on strategic issues' which other authorities agreed to complete for their areas. This was to update strategic planning matters for co-operation and each LPAs position on meeting its housing need.
- **25 November 2020** – Meeting of HMA Partners. The matrix was discussed with the issues of housing need (including Gypsies and Travellers); Transport; Protected Sites

and Green Belt confirmed as the key issues and would inform SoCGs moving forwards.

- **21 & 30 January and 15 February 2021** – Email exchange between EBC and MVDC. As the two authorities most advanced in preparing their Local Plans and at the stage of finalising the evidence base and refining the spatial strategy options, the council focused discussions with MVDC and through a series of email discussions set out the evidence base and positions in relating to: housing, employment, retail, leisure, other commercial (office) uses, transport infrastructure, telecom infrastructure, security infrastructure, waste Management, water supply, wastewater, flood risk, minerals and energy, health, education, culture, natural environment, built environment, natural environment, historic environment, green and blue infrastructure and climate change.

In addition, MVDC explained that after comments received at the Regulation 18 stage, it had re-examined its site selection process and would not be able to meet its local housing need, anticipating it would result in around 100 new homes per year below the figure. MVDC asked provisionally whether EBC would be able to take its unmet need, subject to a formal letter later in the year.

Officers responded stating that EBC could not meet its increase in housing need in the existing urban areas and had explored alternative options including whether neighbouring and other South East authorities could help meet its unmet need. No authority stated it could.

Officers stated that the option of releasing land from the Green Belt to meet all or some of its residual housing need was under consideration. MVDC queried whether Green Belt release in Elmbridge Borough could help meet its unmet housing need. EBC officers explained that no decision by the Council had been made as to the preferred spatial strategy for the borough and in particular, whether the exceptional circumstances to amend the boundaries of the Green Belt had been fully evidenced and justified. EBC officers confirmed however, that as part of the Council's consideration of its preferred spatial strategy, Councillors were being informed and kept up to date of the (potential) unmet housing need arising from neighbouring authorities and that this would form part of their consideration.

- **3 March 2021** – Letter received from MVDC to EBC requesting if any of their unmet need can be provided within Elmbridge Borough. EBC's responses (30 April 2021) stated that, whilst it was in the process of finalising its preferred growth strategy, the evidence base clearly demonstrated that our local housing need could not be met within the boundaries of the existing urban areas. The council highlighted the exercise it had undertaken in January 2020 in which it had contacted all the authorities in the South East to establish whether any of its unmet need could be met elsewhere. The council reiterated its commitment to continuing on-going work with MVDC and stated that should our position change, the council would raise this with MVDC as part of this process.
- **18 June 2021** – MVDC sends EBC a draft SoCGs to be agreed and signed in advance of their Regulation 19 Stage.

- **6 July 2021** – Following a meeting of the council’s Local Plan Working Group and Councillors requesting that officers present an urban strategy for consideration, EBC requests a meeting with HMA Partners to provide an update.
- **15 July 2021** – HMA Partners Meeting. With MVDC and EBC being the two authorities most advance in preparing their draft Local Plans, the meeting is led by the two councils presenting slides of their current positions.

EBC officers provided an update that at the Local Plan Working Group Meeting on 22 June 2021, the Group recommended that the draft Local Plan should look to optimise the urban areas to provide as many homes as possible without destroying the character of Elmbridge. EBC presented slides that confirmed that a strategy of optimising land in the urban area would not meet our housing need and would result in circ. 25% shortfall against the (then) Standard Methodology figure.

MVDC also presented slides setting out their latest position and the key changes from the previous Regulation 18 consultation including the exceptional circumstances considered in order to fully evidence and justify amending the Green Belt. MVDC confirmed that there would also be unmet housing need.

During the discussion, EBC questioned MVDC’s strategy with regard to intensification within the built-up area and wondered whether additional housing capacity could be identified from additional intensification in the built-up area. MVDC said it was not certain that a strategy of further intensification would deliver additional housing because (1) the Development Opportunity Areas policy was untested in Mole Valley and so capacity from this source had arguably to be set conservatively; and (2) the opportunities to intensify within the built-up areas had largely been identified in the site allocations.

The parties agreed that each council was best placed to assess its own development strategy and capacity.

- **16 July 2021** – Note of meeting drafted and circulated by MVD including the suggestion of including this an appendix to the SoCGs. The meeting note was agreed by the HMA Partners.
- **10 August 2021** – EBC Councillor Karen Randolph, Portfolio Holder for Planning Services signs the MVDC & EBC SoCGs for the purpose of MVDC’s Regulation 19 Pre-Submission Consultation. MVDC Councillor Margaret Cooksey, Cabinet Member for Planning signs the SoCGs on behalf of MVDC.
- **18 October 2021** – EBC writes to HMA Partners (and other LPAs in the South East) enquiring as to whether they would be able to assist the council meeting any (potential) unmet housing need (see Appendix 12).

In their responses dated **27 October 2021**, MVDC stated:

“... As you know, the Council has itself sought assistance from all of the districts and boroughs in Surrey and the authorities with which it has significant internal migration links in an attempt to offset its unmet housing need but, in all instances, it has been

unsuccessful. Therefore, given that the Council cannot meet its own housing need, it is unable to meet any other authorities' housing need".

In their response dated **1 November 2021**, RBK stated:

"... Officers are currently working to identify how we can optimise delivery of the sites that have been identified as having potential to deliver additional homes in our Borough. Nonetheless, at this moment in time, we are currently unable to accommodate any unmet housing needs beyond the already very challenging housing requirement prescribed in the London Plan to deliver 9,640 additional homes in the Borough between 2019/20 and 2028/29".

In their response dated **8 March 2022**, EEBC stated:

"... We are therefore in the process of conducting a fresh call for sites to inform the revised LAA and will have a better idea of our capacity when this is complete. However, meeting our own housing need of 579 homes per annum is going to be challenging and, on the evidence available at this stage, we are not able to conclude that EEBC we will be able to meet its identified need or therefore, any of our neighbours' identified unmet need, including the Borough of Elmbridge. Once we have concluded our LAA we would welcome a conversation about our findings".

Copies of the letter and responses received from HMA Partners as referred to above are set out in Appendix 12.

- **November – December 2021** – Emails & telephone discussions between EBC & EEBC. Prior to EEBC's response (dated 8 March 2022) to EBC's letter dated 18 October 2021, the two authorities held a series of discussions regarding the council's evidence base / process undertaken in considering alternative spatial strategies.

In an email dated **19 November 2021**, EEBC officers asked for information regarding the steps EBC has taken to maximise our proposed housing supply such as, by employing the measures mentioned in paragraph 141 of the NPPF. EEBC also asked for an audit of evidence base documents EBC had consulted them on and the responses made.

In response EBC officers provided on **19 November 2021**, a table setting out the engagement Elmbridge has undertaken on its evidence base documents and draft Local Plan Consultations (Reg. 18) with EEBC, MVD and RBK.

In response to the point made by EEBC regarding paragraph 141 of the NPPF, officers explained that this was being covered in a paper that would explain how the spatial strategy was formed. It was stated that this was currently a working draft and would continue to be so until Members had determined the spatial strategy for the borough but that we would provide shortly.

On **29 November 2021**, EBC officers sent over relevant extracts from working draft paper that covered the council's consideration of paragraph 141 of the NPPF (maximising delivery in the urban areas and duty to cooperate) and would be included in the paper setting out how the spatial strategy had evolved. It was explained that the

document will continue to evolve until Councillors have made a formal decision on its development strategy.

In a response from EEBC officers dated **10 December 2021**, it was stated that:

“Collectively, I think that these documents provide a good overview of the steps you have taken to maximise the proposed housing land supply in the built-up areas of the Borough, as encouraged by paragraph 141 of the NPPF before unmet housing need requests should be explored with neighbouring authorities, and how you have engaged with these authorities in assembling your housing evidence base”.

It was explained that following the start of the new Head of Place at EEBC on 4 January 2022, a response would be sent to EBC’s letter dated 18 October 2021. The new Head of Place had been briefed and a draft response drafted by officers engaged to date in the process.

- **19 January 2022** – EBC emailed EEBC welcoming the new Head of Place and requesting a meeting to provide an update on our Local Plan position and duty to cooperate discussions to date.
- **10 February 2022** – Meeting between EBC and EEBC. The response to EBC’s letter date 18 October 2022 shortly followed on 8 March 2022.
- **4 May 2022** – Meeting between EBC and MVDC. Following EBC’s decision on 22 March 2022 regarding the preferred spatial strategy for the borough, a meeting was instigated by EBC offering the opportunity for MVDC to ask any questions in advance of the Regulation 19 Stage.

Officers from MVDC confirmed that they did not consider there to be any legal compliance issues relating to the duty. It was stated that MVDC officers would review the justification of EBC’s preferred spatial strategy (in particular the consideration of exceptional circumstances) but, that ultimately, this was a planning judgement for the council to be tested at the Examination in Public.

- **18 May 2022** – Meeting between EBC and EEBC. Following EBC’s decision on 22 March 2022⁸ regarding the preferred spatial strategy for the borough, a meeting was instigated by EBC offering the opportunity for EEBC to ask any questions in advance of the Regulation 19 Stage. EEBC officers raised no issues with regard to the duty to cooperate. It was agreed that key documentation relating to Strategic Matters would be provided in advance of the Regulation 19 stage. The timing of the Regulation 19 stage and drafting of SoCGs was also discussed.
- **7 June 2022** – Officers from EBC and RBK are due to meet. The key points / outcomes of this discussions will be recorded in a Supplementary Statement that sets

⁸ The Council agreed a draft Local Plan for the Regulation 19 Stage at a Special Council Meeting on 22 March 2022. However, several amendments to the evidence base and draft Local Plan were subsequently made during the period of purdah. As such, an amended draft Local Plan was presented back to Council on 13 June 2022 and agreed for the Regulation 19 Stage.

out activities undertaken between June 2022 and the submission of the draft Local Plan (expected Autumn 2022).

HMA Partners current Local Plan positions & responding to their Local Plan consultations

The timetable for the preparation of each HMA Partners' Local Plans has differed which has meant that at the time of preparing the draft Local Plan, the council has not been able to ascertain whether certain HMA Partners can meet their own accommodation needs or the unmet housing need arising from Elmbridge Borough. Nevertheless, in order for the council to ensure it has an up to date plan by December 2023, it has had to continue with its plan-making process.

The position of each HMA Partners' Local Plan preparation at (April 2022) is set out below including passed consultations and the response made by EBC.

Epsom & Ewell Borough Council

EEBC are in the position of reviewing key pieces of their evidence base e.g. Land Availability Assessment (LAA) and have not reached a conclusion as to whether they are able to meet their own housing need (as set by the Standard Method) although, have stated it is highly unlikely they will be able to. They have also stated it is highly unlikely they will be able to assist in meeting any unmet need arising from Elmbridge Borough.

As part of their Local Plan preparation, EEBC undertook consultation on the Partial Review of the Core Strategy Housing Policies Issues & Options (September 2017) and Issues & Options (January 2018). EBC responded stating support of the pragmatic approach being undertaken by EEBC in seeking to meet their development needs; considering a range of options and the acknowledgement that a combination of them might be appropriate. Our response also highlighted that on the basis of our own work and consultations, it was highly unlikely that it will be able to support EEBC in meeting any residual housing need.

Mole Valley District Council

MVDC has submitted their Local Plan for Examination (14 February 2022) and are due to start the hearing sessions in June 2022. Their Pre-Submission Local Plan (Future Mole Valley) identifies their intention to plan for a local housing need target that is lower than the Government's Standard Method figure (by approximately 21%). As part of our joint discussions, MVDC in March 2021 approached Elmbridge Borough Council (as well as other neighbouring Local Authorities) to see if their unmet need can be met elsewhere. Thus, they are in a similar position to Elmbridge and unable to assist in accommodating our unmet need. Our two authorities continue to engage in discussions regarding unmet need and explore opportunities should they arise.

As part of their plan preparation, MVDC undertook two Regulation 18 Consultation (Issues and Options, July 2017 and Consultation Draft Local Plan, March 2020) and undertook the Regulation 19 Stage in October 2021.

EBC responded to the July 2017 consultation, stating support of the pragmatic approach being undertaken by MVDC in seeking to meet their development needs; considering a range of options and the acknowledgement that a combination of them might be appropriate. At this stage, EBC did query whether smaller scale extensions to one or more of the larger built up areas as opposed to 'significant urban extensions'. Our response also highlighted that on the basis of our own work and consultations, it was highly unlikely that it will be able to support EBC in meeting any residual housing need.

In response to the March 2020 consultation, the council stated it were supportive of the approach being undertaken by MVDC in seeking to meet their development needs. However, in relation to the proposed strategy, stated that it considered it was for individual LPAs to determine whether it is appropriate to release land from within the Green Belt.

The council's response to the Regulation 19 Stage (October 2021) noted MVDC's intention to plan for a local housing need target that is lower than the Government's Standard Methodology figure (by approximately 21%). Constraints to meeting development need were noted. The response referred to the details of the Statement of Common Ground (August 2021) and noted that whilst EBC had not yet decided on its growth strategy, the council's emerging evidence base shows there is a realistic possibility that EBC will not be able to meet our local housing need within our existing urban areas or indeed another authority's unmet need.

Royal Borough of Kingston upon Thames

The Royal Borough of Kingston upon Thames has just completed a Regulation 18 consultation (Further Engagement on the Local Plan, June 2021) which follows a previous Regulation 18 consultation undertaken in May 2019.

In response to the first consultation, the council responded stating support of the pragmatic approach being undertaken by RBK in seeking to meet their development needs; considering a range of options and the acknowledgement that a combination of them might be appropriate. Our response also highlighted that on the basis of our own work and consultations, it was highly unlikely that it will be able to support RBK in meeting any residual housing need.

In response to the June 2021, the council asked for further clarification on how many homes RBK considered it could deliver as not all urban sites have been allocated an indicative housing capacity and no housing trajectory had been provided. It was also stated that whilst aware of the public support for the continued protection of the current extent of the Green Belt, it was unclear as to the planning justifications for the strategic approach in seeking to meet the housing target in the urban areas.

Our response highlighted that it was a realistic prospect that EBC would not be able to meet its own development need without considering the need for Green Belt release and

queried whether any potential unmet need arising from the borough could be met by RBK as their plan evolves and their growth strategy develops.

Responding to evidence base consultations

In addition to responding to HMA Partners' consultations on their Local Plan and the Regulation 18 and 19 Stages where appropriate, as set out in Appendix 5, the council has also responded when consulted on their evidence base documents.

Summary: Can Elmbridge's unmet housing need be met within the wider HMA?

Throughout the preparation of the draft Local Plan, the council has received many indications from its HMA Partners that they will not be able to assist in meeting any unmet need arising from Elmbridge Borough. This includes from discussions at HMA Partner Meetings, responses to our Local Plan Regulation 18 consultations, and from the information in their own Local Plan Regulation 18 and 19 consultations / plans.

In addition, both EEBC and MVDC responded to the council's written enquiry as to whether any (potential) unmet housing need arising from the borough could be met within their areas. Both authorities responded stating this was not a realistic option. Furthermore, in October 2021, this exercise was repeated including RBK. All HMA Partners confirmed their position and stated they were unable to assist or, could not confirm at this time on the basis of the early stages of their local plan preparation.

On the basis of the on-going discussions with HMA Partners, the council has concluded that it is highly unlikely that other LPAs in the HMA will be able to assist in meeting any unmet need arising from Elmbridge Borough and / or will not be in position to confirm until too late in the preparation of our Local Plan process; putting the council at risk of not having an up to date by December 2023.

On-going joint working

EBC will continue to work with HMA Partners; responding to consultations on their evidence base and emerging Local Plans and exploring potential options for meeting potential unmet housing need.

Statements of Common Ground (SoCGs) will be sought with each HMA Partner.

4. Working with neighbouring Local Planning Authorities outside of the HMA

The council has engaged and worked with its neighbouring authorities outside of the HMA in order to establish the HMA in which Elmbridge Borough is located and the borough's housing need.

The council has also engaged neighbouring authorities:

- on the local plan evidence base insofar as understanding and exploring opportunities to address housing need;
- at the Regulation 18 Stages; and
- enquiring whether they can assist in meeting any (potential) unmet housing need arising from Elmbridge Borough.

In addition, the council has responded to other neighbouring authorities' consultations including at the Regulation 18 and 19 Stages of the local plan process raising issues relating to duty to cooperate and the issue of addressing housing need.

The council's activities relating to each neighbouring authorities (not within the HMA) are detailed below.

Guildford Borough Council

Local Plan Position

Guildford Borough Council (GBC) adopted their Part 1 - Local Plan: Strategy & Sites 2015 – 2034 on 25 April 2019 and are now producing the second part of the Local Plan, the Local Plan: Development Management Policies; completing the Regulation 19 Proposed Submission representation period in February 2022.

The preparation of Part 1 of the Guildford Local Plan has been in advance of the Elmbridge draft Local Plan with their Regulation 18 and 19 stages taking place between 2013 and 2017. Part 1 of the Plan was also submitted for Examination in Public in November 2017 prior to the Government's Standard Methodology being implemented.

EBC responded to the consultations on Part 1 of the Local Plan in September 2014, July 2016 and July 2017.

Given EBC's local plan position and how this coincided with the timings of GBC's consultations, our responses were focused towards the evidence base and the potential impact of proposed development sites on the borough. EBC were unable to, at this stage, raise the issue of unmet housing need arising from the borough being met by GBC.

Points raised by EBC were:

- Recognition that the boundaries of HMAs can be 'fuzzy' and that other HMAs have an important functional relationship with the West Surrey HMA.
- The process for assessing the Green Belt and the consideration of development sites.
- The allocation of the development site at Wisley and the additional pressure this would put on the infrastructure across the borough boundary into Elmbridge Borough and, the community of Cobham.

Engagement on the Elmbridge Local Plan Evidence Base

Throughout the preparation of the draft Local Plan, the council has engaged with other LPAs on its evidence base which has helped shaped the spatial strategy for the borough and its strategic and development management policies including site allocations.

Appendix 13 sets out the principal evidence base documents the council has prepared insofar as understanding and exploring opportunities to address housing need. Appendix 13 also shows engagement with neighbouring authorities and where a response was received.

As shown in Appendix 13, GBC was engaged and responded to discussions relating to identifying the Kingston & North-East Surrey SHMA, the preparation of the SHMA and the

Local Housing Needs Assessment (2020). However, no response was received to those documents / consultations that sought opportunities to provide for housing need in the urban areas (Land Availability Assessment (LAA) methodology and Urban Capacity Study (UCS)). A response was received to consultations on the Green Belt including consultation with LPAs where Local Areas crossed administrative boundaries. The Green Belt Boundary Review (GBBR) workshop was also attended in 2015.

In regard to the comments received from GBC on the Local Areas, these focused on ensuring our two studies were consistent when it came to the assessment of Green Belt areas that were assessed as part of our respective studies.

Elmbridge Local Plan - Regulation 18 Consultations

GBC has been consulted at each of the three Regulation 18 Consultations undertaken by EBC. A summary of their response is provided below:

Local Plan: Strategic Options Consultation (2016/17)

GBC submitted a joint response on behalf of the authorities in West Surrey HMA (Guildford, Waverley & Woking Borough Councils). The joint response recognised the early stages of Elmbridge's plan preparation although expressed concern that some options may not meet need and that the need for discussions with duty to cooperate partners to meet any unmet need was raised. Linkages between our respective HMAs was acknowledged although it was stated that every opportunity should be taken to meeting unmet need in the Kingston & North-East Surrey HMA in the first instance. Unmet need arising from Woking was highlighted but that any surplus from Guildford and Waverley would assist Woking in meeting their need rather than that arising from elsewhere.

Local Plan: Options Consultation (2019)

No response was received from GBC.

Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

No response was received from GBC.

Enquiring whether GBC can assist in meeting any (potential) unmet housing need arising from Elmbridge Borough

In January 2020, EBC wrote to all LPAs in the South East enquiring as to whether they would be able to assist the council meeting any (potential) unmet housing need (see Appendix 11).

GBC response dated 31 January 2020 (as summarised in Appendix 14), set out the position of its Local Plan stressing that whilst the plan met need and provided for an oversupply, this should not be considered as 'surplus' supply and cannot therefore

contribute towards meeting unmet needs from elsewhere. The surplus supply was stated to be headroom / contingency.

The response highlighted that in order to meeting GBC's development needs, Green Belt was being released and this approach had been tested through the High Court which has confirmed that housing need can and should form part of the exceptional circumstances test. For these reasons GBC considered that a thorough and robust approach will be necessary in demonstrating that Elmbridge's housing needs cannot be met in full.

The response concluded that if, following further work, it could be successfully demonstrated that the constraints within Elmbridge are such that objectively assessed housing need cannot be met within the borough, then duty to cooperate should be used to explore the extent to which unmet needs can be met elsewhere. In the context of the above, GBC stated it is unable to meet any unmet housing need from Elmbridge. It was stated that, the West Surrey SHMA finds limited functional links between Guildford and Elmbridge and concludes that it sits within different housing market areas and that if unmet needs do need to be met elsewhere then in the first instance this should be directed to local authorities within the Kingston & North-East Surrey HMA.

During October 2021, the council again wrote to the local planning authorities within Elmbridge's housing market area, and those with which there is a shared boundary, to ask whether they would be able to accommodate any of the borough's development needs (see Appendix 12).

GBC responded on 22 October 2021 (as summarised in Appendix 15), stating that with some delays in the delivery of some of the larger strategic sites allocated in Part 1 of their Local Plan, the projected supply over the coming years is likely to remain challenging. It was concluded that for this reason, all currently planned supply is necessary to meet Guildford's housing need and there is no surplus that could be used to accommodate any unmet needs arising from neighbouring authorities.

Meeting with Guildford Borough Council ahead of the Regulation 19 Stage

Following EBC's decision on 22 March 2022⁹, in regard to its draft Local Plan and the preferred spatial strategy for the borough, a meeting was instigated by EBC offering the opportunity for GBC to ask any questions in advance of the Regulation 19 Stage.

The meeting took place on 24 May 2022. GBC officers raised no issues with regard to the duty to cooperate. Elmbridge's position in regard to its spatial strategy and how this was formed as well as the evidence base relating to Travellers, transport, education and Green Belt was discussed. The timing of the SoCGs was discussed and that joint working would continue under the Surrey 2050 Place Ambition and the delivery of the Woking Hub SOA.

⁹ The Council agreed a draft Local Plan for the Regulation 19 Stage at a Special Council Meeting on 22 March 2022. However, several amendments to the evidence base and draft Local Plan were subsequently made during the period of purdah. As such, an amended draft Local Plan was presented back to Council on 13 June 2022 and agreed for the Regulation 19 Stage.

Summary of joint working and engagement

Throughout the preparation of its draft Local Plan, the council has actively engaged GBC on its emerging evidence base, Regulation 18 consultations and on the issue of seeking to meet (potential) unmet housing need arising from Elmbridge Borough.

GBC has however, been clear since its response to the Local Plan: Strategic Options Consultation (2016/17) that it is not in a position to assist Elmbridge and that it is meeting part of Woking's unmet housing need. More recently (2021) GBC has confirmed that its own housing delivery is proving challenging on some of the larger strategic sites.

On-going joint working

EBC continues to work with GBC as part of the Surrey 2050 Place Ambition and seeking to deliver the Working Hub Strategic Opportunity Area (SOA). In particular, ensuring that the potential impacts of the development of Wisley Airfield on Elmbridge Borough are appropriately mitigated.

A Statement of Common Ground (SoCG) will be sought.

Woking Borough Council

Local Plan Position

Woking Borough Council (WBC) adopted their Core Strategy on 25 October 2012 and proceeded to prepare and subsequently adopted the Site Allocations Development Plan Document (DPD) on 14 October 2021. The Site Allocations DPD supports the delivery of the Core Strategy; allocating sites to meet the housing needs of the borough (pre-Standard Methodology) and safeguards land to meet future development needs beyond the present Core Strategy period to 2027.

As the adoption of the Woking Core Strategy in 2012 was prior to EBC's decision to prepare a new Local Plan for the borough, the engagement activities are not considered relevant for the purpose of this Compliance Statement.

However, notwithstanding that WBC's Site Allocations DPD was seeking to implement their Core Strategy and thus a post- Standard Methodology housing number, EBC sought to use the consultations undertaken by WBC as an opportunity to raise cross-boundary strategic planning matters and the issue of housing need.

In response to the Woking 2027 – Site Allocations DPD (June 2015) Consultations, EBC's response dated 28 July 2015 said:

“... In terms of overall observations, we are generally supportive of the approach Woking Borough Council has taken in seeking to increase the delivery of housing development across the Borough. In particular, taking the challenging step of proposing the release of land currently designated Green Belt. Nevertheless, the Council has some concern that whilst the Site Allocations DPD is set to meet the development needs identified in the Core Strategy, more up to date evidence and issues relating to cross-boundary working suggest a need for the Council to increase

the provision of new homes as part of its current plan preparation and not wait until a review of the Core Strategy and/or its Site Allocations DPD.

Elmbridge Borough Council appreciates the Council's desire to continue with the implementation of the Site Allocations DPD on the basis of its post-National Planning Policy Framework (NPPF) Core Strategy. However, as stated in National Planning Policy Guidance (PPG) 'local planning authorities should also consider whether plan making activity by other authorities has an impact on planning and the Local Plan in their area. For example, a revised Strategic Housing Market Assessment will affect all authorities in that housing market area, and potentially beyond, irrespective of the status or stage of development of particular Local Plans' (Local Plans – Preparing a Local Plan, paragraph 009).

Elmbridge Borough Council is aware that a draft Strategic Housing Market Assessment (SHMA) (December 2014) has been published identifying a need to provide between 1,522 – 2,053 homes per annum between 2001 and 2031, across the West Surrey Housing Market Area (Guildford-Woking-Waverley). For Woking Borough, the overall need is said to be between 390 and 588 homes per annum. This represents an increase of approximately 100 – 300 homes per annum above what is currently being planned in the Core Strategy/Site Allocations DPD.

In light of the above, it is the Council's understanding that WBC should be seeking to increase housing delivery above the levels set out in the Core Strategy. The Site Allocations DPD identifies opportunities to do this in the form of accelerating the release of safeguarded land currently identified for the period 2027 to 2040. Therefore, if safeguarded land contains sites there are available and suitable for development, they are required to meet Woking's housing need.

It is considered that these sites are required to meet the identified housing needs of Woking Borough.

Furthermore, even if not considered appropriate by Woking Borough Council to meet the increase in identified housing need, as part of the 'duty to cooperate' consideration should be given as to whether the safeguarded land should be released within the earlier plan period of 2015 to 2027, to meet the wider development needs of the West Surrey Housing Market Area (HMA) (or neighbouring HMAs) where housing need is unlikely to be met. As stated in the NPPF, 'even if a local authority has an adopted Local Plan, it is still required to cooperate with a local planning authority that is bringing forwards its plan' (NPPF, Duty to Cooperate, paragraph 021).

Commenting on its own work, Elmbridge Borough Council has recently commissioned a SHMA alongside the Royal Borough of Kingston upon Thames; Epsom & Ewell Borough Council; and Mole Valley District Council. Elmbridge Borough Council has also commissioned a Green Belt Boundary Review and as in the process of assessing constraints to future housing delivery within the Borough. Whilst this work is on-going the Council is conscious that it has limited opportunities to meet any increase in its housing figures and may need to approach other neighbouring

authorities and HMAs to see if any surplus in its objectively assessed housing need can be accommodated elsewhere...”

On 14 February 2017, EBC in response to a focused consultation on Land to the east of Martyrs Lane, again raised these concerns:

“... The Council would however, also like to use this opportunity to re-emphasise those points made previously in response to the 2015 Regulation 18 Consultation insofar as the overarching principles of housing delivery within Woking Borough and the evidence base upon which various approaches are being considered. Whilst it is understood that this consultation is only seeking site specific responses, it is the overarching principles of housing delivery that ultimately inform each Councils’ Local Plan preparation including, their respective site selection process and approach to safeguarding land for future development.

In terms of overall observations, the Council remains generally supportive of the approach Woking Borough Council has taken in seeking to increase the delivery of housing development across the Borough. In particular, taking the challenging step of proposing the release of land currently designated Green Belt. Nonetheless, the Council is still concerned that whilst the Site Allocations DPD is set to meet the development needs identified in the Core Strategy, more up to date evidence published by Woking Borough Council suggests the need to consider whether it could go beyond its current target and whether the proposed safeguarded sites should be brought forward earlier.

Elmbridge Borough Council is aware that a Strategic Housing Market Assessment (SHMA) (September 2015) has been published identifying a need to provide 1,729 homes per annum between 2013 and 2033, across the West Surrey Housing Market Area (Guildford-Woking-Waverley). For Woking Borough, the overall need is said to be 517 homes per annum. This represents an increase of approximately 225 homes per annum above what is currently being planned in the Core Strategy / Site Allocations DPD.

In light of the above, it is the Council’s understanding that Woking Borough Council should be seeking to identify opportunities to increase housing delivery above the levels set out in the Core Strategy. The previous Regulation 18 consultation identified opportunities to do this in the form of accelerating the release of proposed safeguarded land currently identified for the period 2027 to 2040. Therefore, if safeguarded land contains sites that are available and suitable for development within the current plan period, they could be used to meet unmet housing need identified in the West Surrey Housing Market Area (HMAs) or other neighbouring HMAs.

As part of the ‘duty to cooperate’ consideration should be given as to whether the safeguarded land should be released within the earlier plan period of 2015 to 2027, to meet the wider development needs of the West Surrey Housing Market Area (HMA) (or neighbouring HMAs) where housing need is unlikely to be met. As stated in the National Planning Policy Framework (NPPF), ‘even if a local authority has an adopted

Local Plan, it is still required to cooperate with a local planning authority that is bringing forwards its plan' NPPF, Duty to Cooperate, paragraph 021).

The Council recognises that there may be other constraints preventing safeguarded sites from coming forwards in the immediate plan period e.g. infrastructure. However, within the consultation document it is unclear whether this is the case in this situation.

Commenting on its own work, Elmbridge Borough Council has recently published its Local Plan: Strategic Options Consultation (December 2016). Under its preferred option the Council has identified some opportunities for amending the Green Belt boundary in Elmbridge Borough to meet increasing housing need. However, it is clearly stated that due to the constraints of Green Belt and other environmental designations, that the Council will use the duty to cooperate to enquire as to whether other authorities have the potential to meet some of our need. As set out in paragraph 179 of the NPPF 'joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas - for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework'.

Despite concerns raised by EBC and similarly those raised by Guildford, Runnymede and Waverley Borough Councils, WBC determined in October 2018 that its Core Strategy, having been reviewed by officers, was considered to be up to date in accordance with the then revised National Planning Policy Framework (2018); Planning Policy Guidance and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended by the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017.

WBC concluded that there was no immediate need to modify the Core Strategy either in part or as a whole and therefore continued with the preparation of its Site Allocations DPD.

Subsequently, both GBC and Waverley Borough Council have head room within their adopted housing targets to address the level of unmet need arising from Woking Borough and WBC is not in a position to assist EBC in meeting any (potential) unmet housing need. This position was confirmed through each authorities' examinations.

Engagement on the Elmbridge Local Plan Evidence Base

Throughout the preparation of the draft Local Plan, the council has engaged other LPAs on its evidence base which has helped shaped the spatial strategy for the borough and its strategic and development management policies including site allocations.

Appendix 13 sets out the principal evidence base documents the council has prepared insofar as understanding and exploring opportunities to address housing need. Appendix 13 also shows engagement with neighbouring authorities and where a response was received.

As shown in Appendix 13, WBC was engaged and responded to discussions relating to the preparation of the SHMA and the Local Housing Needs Assessment (2020).

In May 2018 a response from WBC to the Urban Capacity Study was received. This stated that as the study is an objective assessment of the capacity of the urban area to accommodate growth. However, the council highlighted that it would be interested to see how this translated into meeting future development needs, in particular, objectively assessed housing need.

The Green Belt Boundary Review (GBBR) workshop was also attended in 2015.

Elmbridge Local Plan - Regulation 18 Consultations

WBC has been consulted at each of the three Regulation 18 Consultations undertaken by EBC. A summary of their response is provided below:

Local Plan: Strategic Options Consultation (2016/17)

GBC submitted a joint response on behalf of the authorities in West Surrey HMA (Guildford, Waverley & Woking Borough Councils). The joint response recognised the early stages of Elmbridge's plan preparation however, expressed concern that the option may not meet need and that the need for discussions with duty to cooperate partners to meet any unmet need were raised. Linkages between our respective HMAs was acknowledged although it was stated that every opportunity should be taken to meeting unmet need in the Kingston & North-East Surrey HMA in the first instance. Unmet need arising from Woking was highlighted but that any surplus from Guildford and Waverley would assist Woking in meeting their need rather than that arising from elsewhere.

Local Plan: Options Consultation (2019)

WBC requested that the preferred option should be capable of meeting at least the Objectively Assessed Housing Need (OAHN) for Elmbridge Borough. WBC also stated that there was no scope within Woking Borough to meet any unmet need arising from Elmbridge Borough.

Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

No response was received from WBC.

Enquiring whether WBC can assist in meeting any (potential) unmet housing need arising from Elmbridge Borough

In January 2020, EBC wrote to all LPAs in the South East enquiring as to whether they would be able to assist the council meeting any (potential) unmet housing need (see Appendix 11).

WBC's response dated 8 April 2020 (a summarised in Appendix 14), stated that they considered it premature for EBC to come to any decision as to whether there was likely to be unmet need within the borough given the stage of the council's plan preparation and still exploring potential options. It was also stated that prior to requesting neighbouring authorities to meeting any potential un-met need, it would be helpful to demonstrate with

evidence that the needs could not be met within the local HMA where there is significant functional interrelationship.

In addition, WBC confirmed the status of its Local Plan preparation – preparing the Site Allocations DPD based on the Core Strategy; acknowledging that there was a significant unmet need arising from Woking that was being met within its Housing Market Area by Guildford and Waverley Local Plans.

The response concluded that there was no scope for Woking Borough to meet any part of an unmet need arising from Elmbridge Borough (as summarised in Appendix 14).

During October 2021, the council again wrote to the local planning authorities within Elmbridge's housing market area, and those with which there is a shared boundary, to ask whether they would be able to accommodate any of the borough's development needs (see Appendix 12).

WBC responded stating that their position as set out in the response to the January 2020 letter had not change insofar as being able to assist Elmbridge meeting any of its unmet housing need (as summarised in Appendix 15).

Meeting with Woking Borough Council ahead of the Regulation 19 Stage

Following EBC's decision on 22 March 2022¹⁰, in regard to its draft Local Plan and the preferred spatial strategy for the borough, a meeting was instigated by EBC offering the opportunity for WBC to ask any questions in advance of the Regulation 19 Stage.

Officers from EBC and WBC are due to meet on 7 June 2022. The key points / outcomes of this discussions will be recorded in a Supplementary Statement that sets out activities undertaken between June 2022 and the submission of the draft Local Plan (expected Autumn 2022).

Summary of joint working and engagement

Throughout the preparation of its draft Local Plan, the council has actively engaged WBC on its emerging evidence base, Regulation 18 consultations and on the issue of seeking to meet (potential) unmet housing need arising from Elmbridge Borough.

The council has also raised its concerns with WBC regarding its own plan-making and the need to consider reviewing its Core Strategy in light of changes in the wider planning context as opposed to continuing with its Site Allocations DPD.

WBC has however, continued to prepare and adopt its Site Allocations DPD, with GBC and Waverley Borough Council assisting to meet the borough's unmet housing need. As such, WBC has been clear since its joint response from GBC to the Local Plan: Strategic Options Consultation (2016/17) that it is not in a position to assist Elmbridge and that it is

¹⁰The Council agreed a draft Local Plan for the Regulation 19 Stage at a Special Council Meeting on 22 March 2022. However, several amendments to the evidence base and draft Local Plan were subsequently made during the period of purdah. As such, an amended draft Local Plan was presented back to Council on 13 June 2022 and agreed for the Regulation 19 Stage.

meeting part of Woking's unmet housing need. More recently (2021) WBC has confirmed this position.

On-going joint working

EBC continues to work with WBC as part of the Surrey 2050 Place Ambition and seeking to deliver the Working Hub Strategic Opportunity Area (SOA). In particular, ensuring that the potential impacts of the development of Wisley Airfield on Elmbridge Borough are appropriately mitigated.

A Statement of Common Ground (SoCGs) will be sought.

Runnymede Borough Council

Local Plan Position

Runnymede Borough Council (RBC) adopted their 2030 Local Plan on 16 July 2020. The plan was submitted for Examination in Public in July 2018 meaning that, in accordance with transitional arrangements set out in paragraph 214 of the revised NPPF (July 2018), for the purpose of the examination of the plan, the policies in the 2012 NPPF applied. As such, RBC were not required to apply the Standard Methodology.

The preparation of the 2030 Local Plan was in advance of the Elmbridge draft Local Plan with their Regulation 18 and 19 stages taking place between 2016 and 2018. EBC responded to the Regulation 18 consultations in August 2016 and June 2017 and entered a Statement of Common Ground (SoCGs) with RBC and Spelthorne Borough Council for the purpose of the Regulation 19 Stage and Examination of the Plan.

Key issues raised by EBC in our Regulation 18 responses were:

- The preferred spatial strategy states that any unmet housing need would be met by neighbouring HMAs following duty to cooperate discussions. EBC confirmed that whilst it was still at the stage of reviewing its evidence base, given the level of need identified within the borough and wider HMA when balanced against the absolute constraints to development and also giving consideration to Green Belt, it would be highly improbable that the council would meet its own objectively assessed housing need. The council stated it would not therefore be able to accommodate any residual development needs from neighbouring authorities or HMAs (June 2016).
- Re-emphasised the council's responses to the June 2016 consultation in that it being highly improbable that EBC could accommodate any unmet need arising from Runnymede given the statement on unmet need being met by neighbouring HMAs still being made as part of the preferred spatial strategy for the borough (June 2017).

Key points relating to addressing housing need, as set out in the SoCG (June 2018) were:

- In this part of the South East, HMAs tend to be overlapping in nature due to the density of transport networks, both road and rail. This results in localised links across HMA boundaries. It is agreed that there are localised cross boundary links between Elmbridge, Runnymede and Spelthorne Borough Councils for housing matters.

- In the first instance, and in line with paragraph 47 of the NPPF, each of the parties to this SoCG should work collaboratively with their HMA partners and leave no stone unturned in seeking to meet the identified housing needs of each HMA within the relevant HMA boundaries.
- If it becomes apparent that there is an oversupply of housing in either the Runnymede-Spelthorne HMA or in the Kingston and North East Surrey HMA, this oversupply could help meet unmet needs, where they exist, in the surrounding HMAs (including in Elmbridge Borough) depending on the location of housing and the existence of local connections.
- As the housing supply evidence base is completed by both Elmbridge and Spelthorne Borough Councils, the findings will be shared and discussed with each other and Runnymede at key milestones.
- Elmbridge Borough Council supports the process undertaken by Runnymede Borough Council through its housing supply work to maximise the delivery of housing within Runnymede Borough.

Engagement on the Elmbridge Local Plan Evidence Base

Throughout the preparation of the draft Local Plan, the council has engaged other LPAs on its evidence base which has helped shaped the spatial strategy for the borough and its strategic and development management policies including site allocations.

Appendix 13 sets out the principal evidence base documents the council has prepared insofar as understanding and exploring opportunities to address housing need. Appendix 13 also shows engagement with neighbouring authorities and where a response was received.

As shown in Appendix 13, RBC was engaged and responded to discussions relating to identifying the Kingston & North-East Surrey SHMA, the preparation of the SHMA and the Local Housing Needs Assessment (2020).

No response was received to consultation on the draft methodology for the Land Availability Assessment (LAA) however, RBC commented on the draft Urban Capacity Study (UCS). The parameters of the study were noted e.g. policy off-approach in the early stages and the approach to applying densities. The query was raised as to whether further consideration of the urban capacity be undertaken, using a policy-on approach, to specifically account for the housing mix/size of dwelling requirements as set out in the SHMA as this could also have an effect on the overall site capacity of urban sites.

Whilst RBC's response to the UCS did not change the draft report, their query to giving further consideration to urban capacity using a policy-on approach and housing mix/size of dwelling requirements as set out in the SHMA, was addressed in the 2018 LAA and those prepared subsequently.

RBC also responded to the draft methodology for the Absolute Constraints Assessment (2015) and in regard to the council's work on the Green Belt Boundary Review attended to

the Workshop in 2015 and responded to the consultation on the draft methodology; the Local Area; and the draft report. RBC also responded to the consultation on the draft methodology for the Green Belt Boundary Review Supplementary Work.

How the council responded to comments on the:

- Draft methodology for the Absolute Constraints Assessment (2015) is set out in Appendix 6.
- Draft methodology for the Green Belt Boundary Review (2016) is set out in Appendix 7.
- Focused consultation on the Local Areas Assessments (Green Belt Boundary Review 2016) is set out in Appendix 8.
- Draft report for the Green Belt Boundary Review (2016) is set out in Appendix 9.
- Draft methodology for the Green Belt Boundary Review Supplementary Work (2018) is set out in Appendix 10.

Elmbridge Local Plan - Regulation 18 Consultations

RBC has been consulted at each of the three Regulation 18 Consultations undertaken by EBC. A summary of their response is provided below:

Local Plan: Strategic Options Consultation (2016/17)

RBC comments were limited to the potential option of amending the Green Belt boundary around the Brooklands area to accommodate additional employment floorspace.

Local Plan: Options Consultation (2019)

RBC stated that following a review of the consultation, they had no comments to make. However, requested that should an option be progressed to develop a site on the borough boundary then they are kept up to date.

Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

No response was received from RBC.

Enquiring whether RBC can assist in meeting any (potential) unmet housing need arising from Elmbridge Borough

In January 2020, EBC wrote to all LPAs in the South East enquiring as to whether they would be able to assist the council meeting any (potential) unmet housing need (see Appendix 11).

RBC's response dated 24 February 2020 (a summarised in Appendix 14), highlighted that they were in the latter stages of the examination process; awaiting the Inspectors' Report following the Main Modification Consultation in January 2020. It was stated that on the assumption that RBC adopted the Runnymede 2030 Local Plan, it would be likely that an immediate review would begin early in 2021. As part of this review, RBC would need prepare a plan up to 2040 and seek to identify enough land to provide an additional 5,000 homes on top of the 7,500 homes already identified. This was identified as a significant

challenge and that there was little evidence currently to confirm that sufficient sites would become available to meet this need.

It was concluded that it would be impossible to confirm that RBC would be able to assist in meeting any of Elmbridge's unmet need and would be an issue that needed to be examined further as our respective Local Plans progressed.

During October 2021, the council again wrote to the local planning authorities within Elmbridge's housing market area, and those with which there is a shared boundary, to ask whether they would be able to accommodate any of the borough's development needs (see Appendix 12).

RBC response dated 4 November 2021 (as summarised in Appendix 15), confirms that their Runnymede 2030 Local Plan had been adopted, that a review was underway with initial evidence base documents being prepared, and that this review would need to plan up to 2040.

It was stated that in accordance with the SoCG (June 2018) between our authorities, any potential over supply of homes would, in the first instance, go towards assisting Spelthorne in meeting its unmet housing need and suggested that EBC look towards its own HMA in regard to meeting any potential unmet housing need. It was stated that it was unclear as to whether this had occurred.

Reference was also made to previous EBC consultations which considered options for amending the boundaries of the Green Belt in order to meet development need. It was suggested that on the basis of EBC's evidence, exceptional circumstances may be justifiable for releasing Green Belt land.

It was concluded that without EBC demonstrating that this potential strategy option (Green Belt) had been properly explored with any real commitment, it was difficult for RBC to conclude that the Council has turned every stone in seeking to positively meet its identified housing needs.

Joint meetings with Runnymede & Spelthorne Borough Councils

The council has tailored some of its duty to cooperate activities towards LPAs at a similar stage in the local plan process (and their HMA partners) and those behind whereby the council has the ability to consider whether they can meet any (potential) unmet need.

Spelthorne Borough Council's Local Plan preparation has followed a similar timetable to that of EBC. Therefore, with RBC and Spelthorne in the same HMA, the three authorities have frequently met to discuss:

- Our respective local plan positions and those of the North-East Surrey HMA;
- Emerging evidence base documents in particular those relating to housing need / land supply, Green Belt, other constraints to meeting housing need;
- Options under consideration for seeking to address housing need; and
- Whether each LPA has an opportunity to meet unmet housing need arising from other LPAs.

As the council has proceeded to prepare the draft Local Plan, meeting between the three authorities to discuss the above took place on:

- 25 June 2020
- 17 March 2021
- 25 June 2021
- 24 November 2021
- 23 March 2022

The latter three meetings were particularly useful in discussing the preparation of the draft Elmbridge Local Plan. At the meeting 25 June 2021, it was explained that the council's Local Plan Working Group had asked for further work to be undertaken to show what an urban strategy would look like. It was shared that this approach might not meet development needs within the borough.

At the meeting on 24 November 2021, the council responded to the issues raised by RBC and Spelthorne Borough Council in their responses to the October 2021 letter that asked neighbouring and other LPAs if they could meet any of Elmbridge's potential unmet housing need. An email from Elmbridge Borough Council was sent 3 December 2021, summarising the points discussed as set out below:

Working with those Local Planning Authorities in Elmbridge's Housing Market Area HMA)

The Council has been working closely with authorities in the Kingston & North East Surrey HMA (Royal Borough of Kingston upon Thames, Epsom & Ewell and Mole Valley) to see whether, in the first instance, there is the opportunity for any potential unmet housing need arising from Elmbridge to be met within the HMA.

As mentioned, Mole Valley District Council (MVDC) has just finished their Regulation 19 Representation Period on their emerging Local Plan 'Future Mole Valley'. Their draft Local Plan identifies their intention to plan for a local housing need target that is lower than the Government's Standard Method figure (by approximately 21%). As part of our joint discussions, MVDC has approached Elmbridge Borough Council (as well as other neighbouring Local Authorities) to see if their unmet need can be met elsewhere. Thus, they are in a similar position to Elmbridge and unable to assist in accommodating our potential unmet need. Our two authorities continue to engage in discussions regarding unmet need and explore opportunities should they arise.

In regard to Epsom & Ewell Borough Council, they are in the position of reviewing key pieces of their evidence base e.g. Land Availability Assessment (LAA) and have not reached a conclusion as to whether they are able to meet their own housing need (as set by the Standard Method). It is therefore unknown if they can or cannot assist Elmbridge. Due to our differing timescales and the need to have an up to date Local Plan in place by December 2023, we are not in a position to wait for the outcome of their development strategy to progress our Local Plan. Our two authorities continue to engage in discussions regarding housing need and supply and we will continue to explore opportunities with them as their Local Plan develops.

The Royal Borough of Kingston upon Thames has just completed a Regulation 18 consultation. This follows a previous Regulation 18 (undertaken in 2019) and sought to update their 'direction of travel' position in light of the changes to the wider planning context e.g. the publication of the London Plan. We responded to the consultation and I have attached this for your reference. In response to on-going discussions and our October 2021 letter, the Royal Borough has clarified that they are currently working to identify how they can optimise delivery of the sites. Nonetheless, at this moment in time, they are currently unable to accommodate any unmet housing needs beyond the housing requirement prescribed in the London Plan. In addition, whilst we have sought to discuss this point with both the Royal Borough and the Greater London Authority (GLA), any over provision would count towards meeting the wider housing needs of London and not the Kingston & North East Surrey HMA.

Paragraph 11 of the NPPF – neighbouring areas

Paragraph 11(b) of the NPPF states that in regard to plan-making strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.

As mentioned during the meeting and set out above, we are working within our HMA to see if any potential unmet need from Elmbridge can be met by our HMA partner authorities however, given this appears unlikely and in accordance with the NPPF, we are extending our discussions further.

The consideration of Green Belt as an Option

As stated during the meeting, the Council has not made a decision on its preferred development strategy for the borough. Whilst Members of our Local Plan Working Group have asked us to undertake further work on showing what an urban strategy would look like, Green Belt remains an option for meeting our housing need and continues to be discussed with our Members amongst other options e.g. optimisation / intensification / re-purposing employment land. A decision on our preferred development strategy can only be made by our Cabinet and/or Full Council.

Duty to Cooperate before Green Belt

Paragraph 141 of the NPPF states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy: c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

In asking other LPAs whether they are able to assist in meeting any of our potential unmet housing need, the Council is following the correct process as set out in the NPPF. The responses received are reported back and discussed with our Local Plan Working Group and this has been / will be part of their consideration as to the preferred development strategy for the borough. In addition, in accordance with paragraph 11(b) of the NPPF, officers have also and will continue to inform Members of the potential unmet need arising from neighbouring authorities.

Both RBC and Spelthorne Borough Council, welcomed the comprehensive response and stated that they looked forward to seeing how the Elmbridge Local Plan progressed and continued discussions on strategic matters.

The meeting on 22 March 2022¹¹, followed the council's agreement to publish the draft Local Plan which included a spatial strategy that would not meet the development needs of the borough. The potential implications of this approach were discussed in detail including the concern that as neighbouring authorities they could be expected to accommodate Elmbridge's unmet need as has been the case in the West Surrey HMA.

SBC queried whether as part of its approach to authorities within the South East as to whether the council had 'offered' anything in return. EBC responded to say that no quid pro quo was mentioned in the letter as this would very much depend on the circumstances of each LPA, in particular their geographical location and relationship to Elmbridge Borough and the nature of the strategic issue to be agreed. However, it was explained that the letter stated that if a LPA responded to say that it could meet any of Elmbridge's unmet need, EBC would look to discuss this with them further and enter into a SoCG and, there would be no reason why some form of 'trade' could not be discussed at this stage. Nevertheless, EBC officers stated it was considered that whether or not another LPA could meet any (potential) unmet need was a statement of fact.

Both RBC and SBC stated that, depending on the council's justification / evidence for the strategy, they may raise issues of soundness although they considered the duty to cooperate had been complied with.

Meeting with Runnymede Borough Council ahead of the Regulation 19 Stage

Following EBC's decision on 22 March 2022¹², in regard to its draft Local Plan and the preferred spatial strategy for the borough, a meeting was instigated by EBC offering the opportunity for RBC to ask any questions in advance of the Regulation 19 Stage.

Officers from EBC and RBC are due to meet on 17 June 2022. The key points / outcomes of this discussions will be recorded in a Supplementary Statement that sets out activities undertaken between June 2022 and the submission of the draft Local Plan (expected Autumn 2022).

¹¹ The Council agreed a draft Local Plan for the Regulation 19 Stage at a Special Council Meeting on 22 March 2022. However, several amendments to the evidence base and draft Local Plan were subsequently made during the period of purdah. As such, an amended draft Local Plan was presented back to Council on 13 June 2022 and agreed for the Regulation 19 Stage.

¹² See above footnote.

Summary of joint working and engagement

Throughout the preparation of its draft Local Plan, the council has actively engaged RBC on its emerging evidence base, Regulation 18 consultations and on the issue of seeking to meet (potential) unmet housing need arising from Elmbridge Borough.

The council has also had several meetings with RBC and Spelthorne Borough Council to discuss in detail our respective local plan positions, evidence base documents, options being considered to meet development need and emerging spatial strategies.

Regarding unmet housing need, RBC has been clear in the position since the early stages of the Elmbridge Local Plan. Any potential oversupply from Runnymede would go to Spelthorne in the first instance. RBC has also been clear that they consider unmet need arising from Elmbridge Borough should first be met by the council by considering options such as Green Belt and / or through working with authorities in the Kingston & North-East Surrey SHMA.

On-going joint working

RBC is currently reviewing their Runnymede 2030 Local Plan and are seeking to undertake initial consultation on the issues and options in 2022. EBC will continue to work with RBC; responding to their consultations on the evidence base and Local Plan and considering options for addressing unmet housing need.

An updated Statement of Common Ground (SoCG) will also be sought.

Spelthorne Borough Council

Local Plan Position

Spelthorne Borough Council (RBC) are currently in the process of preparation their Local Plan 2020 - 2035. The first consultation on the emerging Local Plan took place in May and June 2018 (Issues & Options) and consulted on the Spelthorne Local Plan Preferred Options document between November 2019 and 21 January 2020. It took the form of Policies and Site Allocations documents setting out the preferred approaches to be considered.

EBC responded to the Regulation 18 consultations on 29 June 2018 and 21 January 2021. Key issues raised by EBC in our Regulation 18 responses were:

- Supported the pragmatic approach being undertaken by SBC in seeking to meet their identified development needs; considering a range of options and the acknowledgement that a combination of them might be appropriate (Issues & Options)
- Acknowledged that SBC is exploring all realistic options to meet its development needs, therefore EBC did not necessarily consider it appropriate at this stage to comment on which option is most suitable (Issues & Options).
- Given the constraints to meeting our own development needs, it was highly improbable that EBC would be able to accommodate its own development needs. On

this basis, EBC confirmed was unlikely to be able to support Spelthorne in meeting any of its residual development needs (Issues & Options).

- EBC welcomed on-going discussions regarding unmet development needs and a strategy for how they be addressed (Issues & Options and Preferred Options).
- Supported the approach of seeking to meet their development needs and the identification of Alternative Option 4 as the Preferred Option. However, the council stated that it believed it was for individual local authorities to determine whether it is appropriate to release land from within the Green Belt for future development in their area (Preferred Options).
- Highlight the requirement to explicitly identify and state whether there are the exceptional circumstances to justify any amendments to the existing Green Belt boundary, both strategically and on a site by site basis (Preferred Options).
- Referenced the potential level of unmet need in Elmbridge Borough stating that EBC appreciates that LPAs are at different plan-making stages and others will be in a similar position in terms of responding positively to the challenge of addressing housing need however, requested that should SBC be able to identify and allocate sufficient sites to meet its development needs, that consideration is given to any residual being allocated towards meeting Elmbridges' need (Preferred Options).
- In addition, the council entered into a joint SoCG with SBC and RBC for the purpose of the Runnymede Local Plan Regulation 19 Stage and Examination of the Plan. Key points relating to addressing housing need, as set out in the SoCG (June 2018) are summarised above under the activities relating to Runnymede Borough Council.

Engagement on the Elmbridge Local Plan Evidence Base

Throughout the preparation of the draft Local Plan, the council has engaged other LPAs on its evidence base which has helped shaped the spatial strategy for the borough and its strategic and development management policies including site allocations.

Appendix 13 sets out the principal evidence base documents the council has prepared insofar as understanding and exploring opportunities to address housing need. Appendix 13 also shows engagement with neighbouring authorities and where a response was received.

As shown in Appendix 13, SBC was engaged and responded to discussions relating to identifying the Kingston & North-East Surrey SHMA, the preparation of the SHMA and the Local Housing Needs Assessment (2020).

No response was received to consultations on the draft methodology for the Land Availability Assessment (LAA) nor Urban Capacity Study (USC). However, a response to the consultation on the draft UCS was submitted. This confirmed that SBC was pursuing a similar approach to that taken by EBC but asked for clarification on whether existing sites currently underutilised were being identified. It was also suggested that further information be included on density guideline and multipliers and whether landowners were being contacted as part of the consideration of a site's availability.

SBC also responded to the draft methodology for the Absolute Constraints Assessment (2015) and in regard to the council's work on the Green Belt Boundary Review attended to

the Workshop in 2015 and responded to the consultation on the draft methodology; the Local Area; and the draft report.

How the council responded to comments on the:

- Draft methodology for the Absolute Constraints Assessment (2015) is set out in Appendix 6.
- Draft methodology for the Green Belt Boundary Review (2016) is set out in Appendix 7.
- Focused consultation on the Local Areas Assessments (Green Belt Boundary Review 2016) is set out in Appendix 8.
- Draft report for the Green Belt Boundary Review (2016) is set out in Appendix 9.

Elmbridge Local Plan - Regulation 18 Consultations

SBC has been consulted at each of the three Regulation 18 Consultations undertaken by EBC. A summary of their response is provided below:

Local Plan: Strategic Options Consultation (2016/17)

SBC noted that the preferred option (Option 2), would not meet need in full, therefore wished to be assured that full discussions have taken place with those authorities within Elmbridge's Housing Market Area to help address this need. Stated that the council wished to be fully satisfied that all options in regard to meeting housing need, including density increases, had been fully considered before the release of any Green Belt.

Local Plan: Options Consultation (2019)

SBC supported the council's use of the Standard Methodology and agreed that the council appeared to have considered all reasonable options in looking to accommodate its housing needs within the consultation document. This included options which would meet Elmbridge's development needs in full.

In regard to Option 5, SBC agreed with the approach taken to Green Belt in that it was only weakly forming Green Belt parcels being considered for release.

Concern was however raised that some options would result in a shortfall and that the two councils face similar challenges and constraints in meeting development need. SBC stated that any Option that did not meet development needs in full would be strongly objected to.

Through the Spelthorne, Elmbridge and Runnymede Statement of Common Ground it was noted that it had been agreed that in the first instance, each authority will work with their HMA partners to meet identified housing needs.

Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

No response was received from SBC.

Enquiring whether SBC can assist in meeting any (potential) unmet housing need

arising from Elmbridge Borough

In January 2020, EBC wrote to all LPAs in the South East enquiring as to whether they would be able to assist the council meeting any (potential) unmet housing need (see Appendix 11).

SBC's response dated 13 February 2020 (as summarised in Appendix 14), highlighted that they were in a similar position to EBC in terms of seeking to address increasing levels of housing need and balancing these against constraints including Green Belt.

It was stated that given the constrained nature of the wider area, SBC felt that it is appropriate for Elmbridge to review its spatial strategy and exhaust all possible options, leaving 'no stone unturned' in endeavouring to meet its housing needs within its own boundaries in the first instance.

It was concluded that SBC were not in a position to assist Elmbridge in helping to meet its housing needs and that it important for Duty to Cooperate discussions to take place on an ongoing and active basis throughout the preparation of the Local Plan and will continue to engage with EBC.

During October 2021, the council again wrote to the local planning authorities within Elmbridge's housing market area, and those with which there is a shared boundary, to ask whether they would be able to accommodate any of the borough's development needs (see Appendix 12)

SBC's response dated 4 November 2021 (as summarised in Appendix 15), set out a summary of their Local Plan position and evidence base. Levels of housing need and the constraints to meet that need (as set out in their previous response) were also set out.

The responses concluded that SBC had not yet fully identify sufficient development sites to meet its Local Housing Need and that if it transpires that SBC is unable to meet its own needs, it would need to work with Duty to Cooperate partners to address any deficit. It was stated that given the current uncertainty associated with development sites and the Staines Development Framework, SBC is not in a position to assist Elmbridge with meeting its housing needs.

Joint meetings with Runnymede & Spelthorne Borough Councils

The council has tailored some of its duty to cooperate activities towards LPAs at a similar stage in the local plan process (and their HMA partners) and those behind whereby the council has the ability to consider whether they can meet any (potential) unmet need.

SBC's Local Plan preparation has followed a similar timetable to that of EBC. Therefore, alongside RBC, the three authorities have frequently met to discuss:

- Our respective local plan positions and those of the North-East Surrey HMA;
- Emerging evidence base documents in particular those relating to housing need / land supply, Green Belt, other constraints to meeting housing need;
- Options under consideration for seeking to address housing need; and

- Whether each LPA has an opportunity to meet unmet housing need arising from other LPAs.

The details of these meeting and key points of discussion are set out above under the key activities / on-going engagement with RBC.

Meeting with Spelthorne Borough Council ahead of the Regulation 19 Stage

Following EBC's decision on 22 March 2022¹³, in regard to its draft Local Plan and the preferred spatial strategy for the borough, a meeting was instigated by EBC offering the opportunity for GBC to ask any questions in advance of the Regulation 19 Stage.

The meeting took place on 4 May 2022. Officers from SBC indicated that they were minded not to recommend to their Members that an objection on the grounds of legal compliance / the duty be raised. It was also stated that SBC officers did not consider anything more could have been done in terms of engagement.

Regarding EBC's preferred development strategy, SBC officers confirmed they did not require any additional information in advance of the Regulation 19 Stage and would review the details once published in order to make an informed representation. Currently, however, SBC officers were minded to recommend to their Members that an objection to the soundness of the strategy be raised.

The Surrey 2050 Place Ambition was discussed with SBC officers raising the importance that the document is not seen as a spatial framework for the county and used as a tool for a wider county approach to address unmet housing need arising from Elmbridge Borough.

Summary of joint working and engagement

Throughout the preparation of its draft Local Plan, the council has actively engaged SBC on its emerging evidence base, Regulation 18 consultations and on the issue of seeking to meet (potential) unmet housing need arising from Elmbridge Borough.

The council has also had several meetings with SBC and Runnymede Borough Council to discuss in detail our respective local plan positions, evidence base documents, options being considered to meet development need and emerging spatial strategies.

Regarding unmet housing need, SBC has been clear in the position since the early stages of the Elmbridge Local Plan. Their position is that it needs to be demonstrated that 'no stone in unturned' is seeking to meet the development needs of the borough and that they would object to any option that did not meet development need.

SBC has also been clear that they are unable to assist EBC in meeting any potential unmet housing need.

¹³ The Council agreed a draft Local Plan for the Regulation 19 Stage at a Special Council Meeting on 22 March 2022. However, several amendments to the evidence base and draft Local Plan were subsequently made during the period of purdah. As such, an amended draft Local Plan was presented back to Council on 13 June 2022 and agreed for the Regulation 19 Stage.

On-going joint working

SBC is at a similar stage in their Local Plan preparation with the Pre-Submission Plan agreed for Regulation 19 publication at an Extraordinary Council meeting on 19 May 2022. The draft Local Plan seeks to meet the development needs of the borough in full through a series of allocations in the urban areas and intensifying the use of these sites and through the release of land from the Green Belt.

EBC will review the draft Local Plan and supporting evidence base and submit a representation in due course.

An updated Statement of Common Ground (SoCG) will also be sought.

London Borough of Richmond upon Thames

Local Plan Position

The London Borough of Richmond upon Thames (LBR) adopted the Local Plan on 3 July 2018 and 3 March 2020 in relation to two legal challenges and work is now underway starting to prepare a new Local Plan for Richmond borough. In February 2020 the council consulted on a Direction of Travel document which sought comments on what the vision for growth and future development should be. This was followed by Consultation on a 'Pre-Publication' Draft Local Plan (Regulation 18) in December 2021. The council will be working to meet the London Plan housing target set for the borough and the latest consultation has stated that this can be exceeded.

The preparation of the adopted Local Plan has been in advance of the Elmbridge draft Local Plan with their Regulation 18 and 19 stages taking place between 2016 and 2017. A draft Local Plan was submitted for Examination in Public in May 2017.

Given EBC's local plan position (see Figure 7) and how this coincided with the timings of LBR's consultations, our responses were focused towards the evidence base and agreeing the cross-boundary strategic planning matters. EBC were unable to, at this stage, raise the issue of unmet housing need arising from the borough being met by LBR.

Regarding the emerging Local Plan, EBC responded to the Consultation on a 'Pre-Publication' Draft Local Plan (Regulation 18) in April 2022. The response was outside of the consultation period but sent for information and to confirm those points discussed at a duty to cooperate meeting on 24 January 2022. Key issues raised by EBC in our Regulation 18 responses were:

- Noted that the target set for the London Borough of Richmond upon Thames by the London Plan is 411 homes per annum (4,110 homes in the ten-year housing target) and that Policy 10 'New Housing', states that the Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan Policies.
- Highlighted that EBC had taken the decision (at its Full Council meeting on 22 March 2022¹⁴) to pursue a spatial strategy that will not meet its local housing need figure (as set by the Standard Methodology).

- Given that the LBR plan shows that the London Plan target can be exceeded (potentially by circ. 700 homes across the 10-year period) asked whether any of the anticipated unmet need of Elmbridge Borough (circ. 2,500 homes) can be met by LBR.

Engagement on the Elmbridge Local Plan Evidence Base

Throughout the preparation of the draft Local Plan, the council has engaged other LPAs on its evidence base which has helped shaped the spatial strategy for the borough and its strategic and development management policies including site allocations.

Appendix 13 sets out the principal evidence base documents the council has prepared insofar as understanding and exploring opportunities to address housing need. Appendix 13 also shows engagement with neighbouring authorities and where a response was received.

As shown in Appendix 13, LBR was engaged and responded to discussions relating to identifying the Kingston & North-East Surrey SHMA, the preparation of the SHMA and the Local Housing Needs Assessment (2020).

A response was received to the consultation on the draft methodology for the Land Availability Assessment (LAA) however no response was received to the draft methodology nor draft report in relation to the Urban Capacity Study (USC).

The response to the draft methodology for the LAA officers did not have any specific comments to make at this stage but will continue dialogue under the duty to cooperate as the preparation of our plans progresses.

LBR also responded to the council's work on the Green Belt Boundary Review, commenting on the consultation on the draft methodologies (2016 and 2018).

How the council responded to comments on the:

- Draft methodology for the Green Belt Boundary Review (2016) is set out in Appendix 7.
- Draft report methodology for the Green Belt Boundary Review Supplementary Work (2018) is set out in Appendix 10.

Elmbridge Local Plan - Regulation 18 Consultations

LBR has been consulted at each of the three Regulation 18 Consultations undertaken by EBC. A summary of their response is provided below:

Local Plan: Strategic Options Consultation (2016/17)

LBR agreed with the significant weight to be placed on the protection of Green Belt and the overall integrity and function in accordance with the NPPF and stance of the Greater

¹⁴ The Council agreed a draft Local Plan for the Regulation 19 Stage at a Special Council Meeting on 22 March 2022. However, several amendments to the evidence base and draft Local Plan were subsequently made during the period of purdah. As such, an amended draft Local Plan was presented back to Council on 13 June 2022 and agreed for the Regulation 19 Stage.

London Authority (GLA) when seeking to meet housing need. Their response acknowledged that they were a neighbouring authority and that housing was a cross-boundary strategic matter.

LBR noted the work of the SHMA and the need for Elmbridge and that Options 1 and 2 considered using the duty to enquire as to whether other authorities have the potential to meet some unmet need. The response highlighted that the constraints to meeting need were the same between the two boroughs and therefore, LBR were not in a position to meet any additional need.

It was noted that the Option 2 would not meet need in full, therefore it was stated that the LBR would wish to be assured that full discussions have taken place with those authorities within Elmbridge's HMA to help address this need.

The response concluded that the council would wish to be fully satisfied that all options in regard to meeting housing need, including density increases, had been fully considered before the release of any Green Belt.

Local Plan: Options Consultation (2019)

A joint response submitted on behalf of LBR and London Borough of Wandsworth did not state a preference in terms of the options but emphasised the need to demonstrate exceptional circumstances prior to the consideration of amending Green Belt boundaries. The response highlighted that the issue of housing remains a strategic and cross-boundary issue and recognised the importance of planning to meet identified needs, along with taking a consistent approach to matters such as the River Thames and Green Belt. It was noted that discussions continued under the duty to cooperate.

Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

The response noted that this consultation builds on the options consultation undertaken in 2019, moving on from housing, to consider the proposed vision and objectives for the Plan. LBR supported the emphasis, such as on protecting the environment and tackling climate change, which are priorities shared by our councils.

Enquiring whether LBR can assist in meeting any (potential) unmet housing need arising from Elmbridge Borough

During October 2021, the council again wrote to the local planning authorities within Elmbridge's housing market area, and those with which there is a shared boundary, to ask whether they would be able to accommodate any of the borough's development needs (see Appendix 12).

LBR's response dated 11 November 2021 (as summarised in Appendix 15), set out a summary of their Local Plan position and evidence base as well as levels of housing need and the constraints to meeting that need. The position of the London Plan was also set out including the fact that London as a whole is unable to meet its housing need.

It was concluded that at the time, LBR do not have any spare housing capacity to meet unmet need from any other boroughs, particularly from outside London. Furthermore, it

was stated that if LBR was able to meet their own future housing need and/or even exceed the London Plan target (the new target of 411 per annum is a challenging increase from the previous target of 315 per annum), as these are not applied as a cap, the council would be seeking to exceed those rather than meeting another borough's need.

Meeting with London Borough of Richmond upon Thames ahead of the Regulation 19 Stage

Following EBC's decision on 22 March 2022¹⁵, in regard to its draft Local Plan and the preferred spatial strategy for the borough, a meeting was instigated by EBC offering the opportunity for LBR to ask any questions in advance of the Regulation 19 Stage.

Officers from EBC and LBR are due to meet on 10 June 2022. The key points / outcomes of this discussions will be recorded in a Supplementary Statement that sets out activities undertaken between June 2022 and the submission of the draft Local Plan (expected Autumn 2022).

Summary of joint working and engagement

Throughout the preparation of its draft Local Plan, the council has actively engaged LBR on its emerging evidence base, Regulation 18 consultations and on the issue of seeking to meet (potential) unmet housing need arising from Elmbridge Borough.

Regarding unmet housing need, LBR has been clear in the position since the early stages of the Elmbridge Local Plan. Their position is that that they are unable to assist EBC in meeting any potential unmet housing need and any over provision within the London Borough of Richmond would account towards exceeding those targets as opposed to meeting another borough's need.

In addition, even if any over provision was allocated towards another borough, in the first instances this would be towards those London Boroughs in the GLA.

On-going joint working

LBR is at a similar stage in their Local Plan preparation; aiming to publish their Pre-Submission Plan in Autumn 2022. EBC will review the draft Local Plan and supporting evidence base and submit a representation in due course.

A Statement of Common Ground (SoCG) will be sought.

Summary: Can Elmbridge's unmet housing need be met by neighbouring LPAs?

Throughout the preparation of the draft Local Plan, the council has received many indications from its neighbouring LPAs that they will not be able to assist in meeting any unmet need arising from Elmbridge Borough. This includes from discussions at Surrey Planning Officer meetings, responses to our Local Plan Regulation 18 consultations, and from the information in their own Local Plan Regulation 18 and 19 consultations / plans.

¹⁵ The Council agreed a draft Local Plan for the Regulation 19 Stage at a Special Council Meeting on 22 March 2022. However, several amendments to the evidence base and draft Local Plan were subsequently made during the period of purdah. As such, an amended draft Local Plan was presented back to Council on 13 June 2022 and agreed for the Regulation 19 Stage.

In addition, neighbouring LPAs have responded to the council's written enquiry as to whether any (potential) unmet housing need arising from the borough could be met within their areas. The responses received from the letters sent in January 2020 and October 2021 all indicated that this was not possible / highly unlikely.

On the basis of the on-going discussions with neighbouring authorities, the council has concluded that it is highly unlikely that other neighbouring LPAs will be able to assist in meeting any unmet need arising from Elmbridge Borough and / or will not be in position to confirm until too late in the preparation of our Local Plan process; putting the council at risk of not having an up to date by December 2023.

5. Working with other Surrey Authorities as a collective and other Partners (2013 – to current)

As well as those Surrey LPAs the council has worked with as part of the HMA Partnership and as neighbouring authorities, the 11 Surrey Boroughs and Districts as well as Surrey County Council (SCC) have worked collectively through Surrey Future.

Officially launched on 6 March 2013, Surrey Future brings together Surrey's local authorities and business leaders to agree the investment priorities to support the county's economy with the aim of retaining existing businesses and attracting new ones in the right locations. Building on the existing or emerging Local Plan of each of the 11 districts and boroughs in Surrey and the aims of the Local Enterprise Partnerships (LEPs) covering Surrey (Enterprise M3 and Coast to Capital), the initial focus for Surrey Future was on the strategic physical infrastructure required to deliver the economic development and spatial growth priorities in these plans.

Surrey Future is guided by a Steering Board (the chair up to March 2022 being the former Chief Executive of Elmbridge Borough Council). Memberships includes Executive and Directors from the Surrey boroughs and districts and the County Council; the LEPs; the Gatwick Diamond Initiative; Surrey Nature Partnership; and the Chair of the Surrey Employment and Skills Board. The Board also has the Deputy Leader of Surrey County Council as a champion.

Surrey Local Strategic Statement

Coinciding with the early preparation of the new Local Plan, in July 2014, the Surrey Leaders' Group agreed to establish a Strategic Planning and Infrastructure Partnership to facilitate joint working to address strategic issues and deliver on strategic priorities. The scope of the Partnership envisaged the development of a planning and investment framework comprising:

1. A Local Strategic Statement (LSS) that sets out shared objectives around spatial, infrastructure and economic issues and a broad direction for spatial planning on strategic priorities;
2. A Memorandum of Understanding (MoU) on how councils will work together towards an LSS and more generally on strategic planning; and,

3. An Investment Framework to support the delivery of the strategic priorities in the LSS including a co-ordinated approach to infrastructure funding and delivery that builds on the Surrey Infrastructure Study (SIS).

The aim of the LSS was to set out a consensus around common objectives and priorities through an overarching spatial planning vision for Surrey, covering the period 2016 to 2031. Although a non-statutory document, it would be a key tool to help councils manage growth sustainably and to provide important evidence for Surrey boroughs and districts to demonstrate that strategic cooperation was an integral part of their Local Plan preparation. It would be informed by existing and new evidence developed to support Local Plan preparation by the boroughs and districts and the Surrey Infrastructure Study. It would also reflect the Coast to Capital and Enterprise M3 LEPs' strategic economic plans and take account of other wider relationships.

Regarding evidence, it was agreed that to inform any decisions about balancing land use demands, there were four major pieces of evidence that need to be assembled:

- a) picture of housing need across Surrey which means having NPPF **compliant Strategic Housing Market Assessments (SHMA)** that cover each borough and district.
- b) having an up to date picture of the **Green Belt** to inform local plans and the LSS.
- c) a picture of **infrastructure needs** which would draw heavily on Surrey Future which largely reflects strategic transport infrastructure needs, but together with the LEP SEPs also addresses other infrastructure such as flood defence and regeneration schemes.
- d) a picture of envisaged **economic growth**.

It was envisaged that the updated and expanded evidence base described above would provide evidence of co-operation, but it would not achieve effective outcomes on Surrey wide and sub-regional issues. Accordingly, the second stage of the work would be to pull together the evidence with land supply evidence from existing Local Plan work undertaken by the boroughs and districts to form an opinion at Board level about the broad prioritisation of areas for housing growth (including any potential strategic sites). This would take account of economic growth ambitions and strategic infrastructure priorities already identified. It would require hard issues to be addressed.

It was identified that this would require an additional piece of work to assess potential housing provision across Surrey and to consider to what extent any shortfall might be addressed taking into account wider land use demands, particularly employment land and the 'balance' of housing and employment provision and environmental constraints. It then fills the crucial gap in the current arrangements and would provide the basis to enable the production of an LSS that would set a broad strategic direction for local authorities and a framework to help them meet the duty to cooperate by addressing strategic issues.

At a meeting of Cabinet on 19th November 2014, EBC agreed the Memorandum of Understanding and Terms of Reference for the preparation of the Surrey LSS.

An Interim LSS was drafted collaboratively by the Surrey authorities alongside Surrey County Council and agreed by the Surrey Strategic Planning and Infrastructure Partnership in February 2018 following consultation with partners (see Appendix 2).

Within the Interim LSS, Elmbridge was identified as being within the Upper M3 Sub-area in north west Surrey which also included the boroughs of Runnymede and Spelthorne. In regard to this sub-area, paragraph 3.21 of the interim LSS stated:

“Given that land in the Upper M3 area is severely constrained, it is unlikely that all the development needs identified will be met in full. **To seek to maximise housing delivery, consideration will need to be given as to whether other less constrained sub-areas in Surrey, or beyond the county boundaries are able to support additional development in order to meet any unmet needs**”. (Council’s emphasis).

At this point in the process, it was the council’s understanding that in accordance with the provisions of the LSS, Surrey authorities would work together on a County-basis to see how any unmet need could be met.

Surrey 2050 Place Ambition

However, in recognition of changes to national planning policy since the LSS was originally proposed and LEPs being charged with preparing Local Industrial Strategies, it was agreed by Surrey Future in June 2018 that Surrey Leaders and Chief Executives should develop a growth vision and strategy for Surrey as a whole to take forward the LSS into an agreed long term spatial strategy for Surrey (and sub-county areas), setting out key strategic opportunities, including infrastructure and economic priorities.

An agreed shared vision and set of strategic priorities was seen as central to this and in July 2019 the Surrey Future Steering Board launched "Surrey's 2050 Place Ambition" to facilitate good growth.

In July 2019, Surrey’s 2050 Place Ambition (Our approach to place leadership, infrastructure and good growth) was published (Appendix 16). It is an agreed growth strategy for Surrey which sets out three long term strategic priorities and eight identified Strategic Opportunity Areas, which will be shaped and delivered within the context of the shared growth vision, principles and values.

As part of its evolution, the Place Ambition has been looked at to reflect the current planning context, especially the challenges around economic recovery (post Covid-19 pandemic) and the increasing weight being given nationally to climate change, biodiversity, health and well-being and improving the quality of developments.

In December 2021, on behalf of Surrey Future, Surrey County Council published and sought comments on Surrey’s 2050 Place Ambition - Spatial Framework: A Strategic Vision for Place Leadership, Infrastructure & Good Growth Draft Version 2. Published alongside Draft Version 2 of the Surrey 2050 Place Ambition, is an Implementation Framework which was also the subject of this consultation (See Appendix 17).

Under Strategic Priority 2: Enhancing the place offer of Surrey’s towns, the Ambition states that our urban areas will continue to be where most of Surrey’s homes, services

and jobs are located. It has identified that focusing growth in these areas will provide the greatest opportunity to support access to services and cultivate changes in the way that we travel, both within urban areas and between different places. With three quarters of the land in Surrey being covered by Green Belt and national and international environmental designations there is a need to make effective use of our urban areas.

The Ambition identifies the larger centres of Guildford, Reigate/Redhill, Staines and Woking in particular, as areas which will continue to provide the greatest potential for delivering a strong residential and economic offer, and will be key in enhancing Surrey's transport connectivity.

Furthermore, the Ambition recognises that given Surrey's close proximity to London there are no options for delivering sustainable development and large new settlements of the same scale that is possible in other parts of the country, without compromising some of our most valuable assets or redirecting investment away from the main urban areas. The Ambition, however, identifies a number of opportunities to deliver some completely new settlements to help meet housing needs and support the economic priorities of the County up to 2050. None of these opportunities are within Elmbridge Borough; the four new communities have been proposed in Dunsfold; Longcross; South Godstone and Wisley.

Strategic Priority 3: Maximising the potential of our Strategic Opportunities Areas (SOA), identifies those areas with the greatest long-term potential for delivering 'good growth' across Surrey by investing in places that offer opportunities to boost productivity by maximising the value of strategic assets such as universities, transport hubs and strategic employment sites / centres to support our economic strengths and priority industrial sectors.

Elmbridge borough is not at the centre of a SOA identified for facilitating the delivery of growth. There are some areas of the Borough (Brooklands & Weybridge) that are identified within the Woking Hub SOA. The council is predominately working with the County Council and Guildford & Woking Borough Councils on the delivery of the SOA.

6. Engagement with Local Planning Authorities in the South East (2020 and 2021)

Through on-going joint working with authorities in the HMA; other neighbouring authorities; and those within the wider-Surrey Area (as part of the Local Strategic Statement (LSS) / Surrey 2050 Place Ambition) as well as from reviewing the responses from other Local Planning Authorities to the Local Plan: Options Consultation (August 2019) and the emerging evidence base, the council was mindful at this stage in the preparation of the new Local Plan (late 2019) that, not only was it highly unlikely that the local housing need figure could be met within the existing urban areas but also that it was highly unlikely that other Local Planning Authorities that the council had primarily engaged with so far, would be able to assist the council in meeting any unmet housing need.

In January 2020 the council wrote to all local authorities in the South East region under the duty to explore any potential for accommodating the borough's anticipated residual housing need (see Appendix 11).

The area in which the council engaged other local authorities was extended to the South East following a meeting with officers from the former Ministry of Housing, Communities and Local Government (MHCLG) as part of wider discussions with Elmbridge Officers and Councillors on housing numbers and the Green Belt. In discussing the challenge Elmbridge and other Surrey Authorities faced in balancing the requirement to meet our housing numbers and, protect the Green Belt, it was suggested that the council look beyond County boundaries and engage across a wider area. Reference to the coast was made as well as the entirety of the South East forming part of the larger London Housing Market Area.

A summary of the responses received is set out in Appendix 13. Where a LPA did not respond, the council (following chaser emails) researched each LPAs' Local Plan position using the information available at the time on their websites to ascertain the likelihood of them being able to assist the council in meeting its unmet housing need (see Appendix 18). For example, had it been established they could meet their own need; were they meeting the needs of other neighbouring authorities; and where they were with their plan preparation.

The conclusion of this process was that no local authority in the South East considered themselves to be in a position to assist in meeting any of the potential unmet housing need of the borough (circ. 4,000 homes on the basis of not amending the Green Belt boundary and on the local Plan evidence base available at the time). Neither did the council identify any LPA that was likely to assist through its own research.

During October 2021, the council again wrote to the local planning authorities within Elmbridge's housing market area, and those with which there is a shared boundary, to ask whether they would be able to accommodate any of the borough's development needs. The council also wrote to every other local planning authority within the South East of England, to invite them into discussions as to whether there would be a reasonable prospect for meeting Elmbridge's needs within their areas (see Appendix 19). Respondents all advised that there is no possibility of their areas accommodating Elmbridge's unmet needs (as summarised in Appendix 15).

From the process of actively engaging LPAs within the wider South East region, it is apparent that due to their own constraints and / or their current plan position, no other local authority has the capacity available to meet any unmet housing need arising from Elmbridge.

7. Summary: Strategic Matter 1 – Housing

The council considers it has met the Duty-to-Cooperate requirements of Section 33A of the Planning and Compulsory Purchase Act 2004, when seeking to meet its housing need and is of the opinion that the cooperation it has undertaken has been:

- Constructive;
- Active; and,
- On an ongoing basis

The council has conducted active, and indeed extensive, duty to cooperate activities in seeking to address its housing need; starting with its HMA Partners and moving towards neighbouring authorities, the rest of Surrey and the South East when seeking a solution.

Engagement has taken the form of letters, meetings, informal discussions and consultation on the evidence base and at the three Regulation 18 Stages. Engagement began early in the plan-making process on the evidence base work to ensure agreement on the foundations of the draft Local Plan. This continued through the options and appraisals as the evidence base developed and beyond the decision-making process and finalisation of the draft Local Plan.

EBC indicated from as early stage as possible in the preparation of the new Local Plan that meetings its development need would be challenging; warning other LPAs of this and for them to consider the prospect of planning for EBC’s unmet need.

However, none of the authorities contacted were able to assist with EBC’s unmet housing need. The position has fed into the council’s consideration of the options for the spatial strategy for the borough (see ‘How the Spatial Strategy was formed’ paper).

The council will continue to work with other LPAs to seek opportunities to address unmet housing need arising from the borough and from neighbouring authorities.

Category	Details
<p>Summary of outcomes from strategic working:</p>	<ol style="list-style-type: none"> 1. The identification of our HMA and neighbouring authorities for which the council needs to work with to address its housing need. 2. A robust and credible assessment of the accommodation needs of our existing and future residents which has been informed via the engagement of HMA Partners, neighbouring authorities and other Stakeholders. 3. The understanding / recognition that its HMA Partners and other neighbouring authorities expanding across the South East cannot or are highly unlikely to be able to assist the council in meeting any unmet housing need. 4. Initial agreement that the council has complied with the duty when seeking to address housing need. 5. Commitment to continue to engage and actively explore with neighbouring authorities’ ways for how the unmet housing need of the borough may be met elsewhere as neighbouring plans come to fruition and opportunities may arise.
<p>Links to the draft Local Plan:</p>	<ul style="list-style-type: none"> • The Vision – Elmbridge 2037 • Principle 3 – Delivering homes for residents • Policy SS2 – Sustainable place-making • Policy SS3 – Scale and location of growth

	<ul style="list-style-type: none"> • Policy HOU1 – Housing delivery • Policy HOU2 – Optimisation of sites • Site allocations
<p>On-going cooperation:</p>	<ol style="list-style-type: none"> 1. Through on-going discussions with relevant authorities, the council will continue to constructively work with other authorities to see how the needs of the wider area can be met. 2. The council will continue to work with Surrey County Council, Surrey boroughs and districts and other Stakeholders to agree and deliver the Surrey 2050 Place Ambition. Of particular importance to the council is the SOA: Woking Hub. 3. Statements of Common Ground (SoCGs) or updated SOCGs will be sought with each HMA Partner and neighbouring authorities to cover all relevant Strategic Matters including housing.

Strategic Priority A) Housing (including affordable housing), employment and retail, leisure and other commercial development

Strategic Matter 2: Roma, Gypsies, Travellers and Travelling Showpeople and Houseboat Dwellers

Category	Details
Strategic Planning Issue:	Assessing and meeting the housing need of Roma, Gypsies, Travellers and Travelling Showpeople and Houseboat Dwellers - Setting the scale, distribution and location of sites, yards and moorings for Elmbridge and neighbouring Local Authorities.
Strategic Partners:	<ul style="list-style-type: none"> • Epsom & Ewell Borough Council (EEBC) • Guildford Borough Council (GBC) • London Borough of Richmond (LBR) • Mole Valley District Council (MVDC) • Reigate & Banstead Borough Council (RBBC) • Royal Borough of Kingston upon Thames (RBK) • Runnymede Borough Council (RBC) • Spelthorne Borough Council (SBC) • Surrey County Council (SCC) • Surrey Heath Borough Council (SHBC) • Tandridge District Council (TDC) • Waverley Borough Council (WavBC) • Woking Borough Council (WBC) • Environment Agency (EA)
Key Evidence Base:	<ul style="list-style-type: none"> • Gypsy & Traveller Accommodation Assessment (2020) • Gypsy, Roma and Traveller Site Assessment Update (2022) • Houseboat Dwellers Accommodation Assessment (2022) • SA/SEA

This section is set out as follows:

- 1. Local Plan Evidence Base Preparation (2015 – 2016)**
- 2. Elmbridge Local Plan - Local Plan: Strategic Options Consultation (2016/17)**
- 3. Local Plan Evidence Base Preparation (2017)**
- 4. Elmbridge Local Plan - Local Plan: Options Consultation (2019)**
- 5. Local Plan Evidence Base Preparation (2019 – 2020)**
- 6. Elmbridge Local Plan - Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)**
- 7. Meeting accommodation needs**
- 8. Other engagement activities**
- 9. Boat-dwellers**

Actions:

The above Strategic Partners have been engaged throughout the preparation of the new Elmbridge Local Plan including at the Regulation 18 consultation stages and in the preparation of the council's evidence base. Key activities have been set out below.

1. Local Plan Evidence Base Preparation (2015 – 2016)

Gypsy & Traveller Accommodation Assessment (2017)

Exploring opportunities for joint-working (May – November 2015)

The GTAA was published in 2017 however, its preparation commenced in 2015/16, when the council engaged its Strategic Partners on the potential for a joint study and reviewed the draft methodology.

With an updated version of the Government's Planning policy for traveller sites (PPTS) emerging and new evidence on household formation rates available, discussions amongst the Surrey boroughs and districts commenced in May 2015 as to whether there was interest in a joint piece of work to review and update the then shared Surrey Methodology (Preparing Travellers' Accommodation Assessments (TAAs) – The Surrey Approach – (April 2012)) and associated joint assessments (3 GTAAs were completed prior to 2017 covering Surrey 'groupings'. Elmbridge formed part of the East Surrey GTAA).

Following a meeting of the Planning Working Group (PWG) on 8 May 2015, a sub-group was formed to review the Surrey Methodology and to consider whether it was fit

for purpose or needed revisions. Having reviewed the Surrey Methodology and seeking advice from Government as to when the new PPTS might be published, the sub-group reported back to PWG.

The outcomes of these discussions were that whilst a revised methodology was likely to be required, some authorities considered there to be a degree of risk advancing this work in advance of the updated PPTS and that a joint methodology would be problematic to co-ordinate given that varying local plan timetables and priorities in work programmes.

The decision was thus taken to explore with East Surrey Authorities (Elmbridge, Epsom and Ewell, Mole Valley, Reigate & Banstead and Tandridge) whether there was interest in a joint review of the methodology and the commissioning of an up to date assessment. The East Surrey authorities were engaged through a series of emails (dated October 2015) with a joint meeting held on 12 November 2015.

Similar to the conclusion of the PWG, it was concluded that a joint methodology would be beneficial although a joint study was likely to be problematic given various local plan timetables and priorities in work programmes. Nevertheless, it was agreed to pursue the opportunity for producing a joint methodology and to explore whether other neighbouring authorities (to East Surrey) outside of the County would be interested in pursuing this option.

Expressions of interest from these authorities as well as seeking confirmation as to the position of Surrey authorities outside of East Surrey were sought in November 2015. At the time the following authorities confirmed their interest:

- Elmbridge Borough Council
- Mole Valley District Council (see below)
- Reigate & Banstead Borough Council
- Sevenoaks District Council (later withdrew)
- Tandridge District Council

Mole Valley District Council confirmed they were unable to meet the timetable set out but were willing to continue discussions re: a joint methodology, so that they could replicate at a later date to ensure consistency across a wider area.

Commissioning a joint-methodology (December 2015 – February 2016)

Elmbridge Borough Council alongside Reigate & Banstead Borough Council and Tandridge District Council still considered merit in a joint-methodology and procured consultants to produce a joint methodology but individual assessments. Individual assessments were considered appropriate due to the three authorities involved not forming a 'single' area with shared boundaries e.g. Elmbridge is separated from the other two authorities by Mole Valley, Kingston upon Thames, and Epsom & Ewell.

In the absence of a collaboration agreement between the three authorities, it was

agreed that a standard set of principles be established. These principles set out the expectations for the project and those placed on each local authority.

Opinion Research Services (ORS) was appointed to prepare a joint methodology in January / February 2016 and individual assessments for the three authorities.

The engagement of other authorities on the joint-methodology (February – April 2016)

Engagement of the other local authorities (and other relevant stakeholders) occurred through telephone interviews with the intention of understanding neighbouring local planning authorities' positions in regard to their own assessment work and to also understand any cross-boundary issues. Stakeholder Topic Guides formed the basis of the interviews which had previously been agreed by the commissioning authorities alongside a list of those relevant authorities to engage in the process. The aim of the Topic Guides / consultation was to seek views on the draft methodology and resolve any issues from the outset prior to the commencement of the analysis of data.

Between February and April 2016, ORS engaged and received a response from the following authorities and others relevant partners (those in bold and italics are neighbouring authorities to Elmbridge Borough):

- Crawley Borough Council
- ***Guildford Borough Council***
- London Borough of Bromley
- London Borough of Croydon
- ***London Borough of Richmond***
- London Borough of Sutton
- Mid Sussex District Council
- ***Mole Valley District Council***
- Reigate Borough Council
- ***Runnymede Borough Council***
- ***Spelthorne Borough Council***
- Surrey Community Action – Gypsies & Travellers
- Surrey County Council – Brighter Futures / Gypsy Skills
- Surrey County Council – Estates Delivery Manager
- Surrey County Council – Gypsy & Traveller Liaison Officer (site management)
- Surrey Gypsy & Traveller Community Relations Forum
- Wealdon Borough Council
- ***Woking Borough Council***

Epsom & Ewell Borough Council and the Royal Borough of Kingston upon Thames (neighbouring boroughs to Elmbridge) were also approached by the consultant however, no response was received. There was also no response from the Greater London Authority.

Acting on the consultation responses it was agreed between the commissioning authorities and ORS that, moving forward with this work the three authorities:

- would continue to engage neighbouring boroughs and districts as and when appropriate in regard to the development of the joint methodology and their individual assessments.
- discuss at Planning Working Group the initial outcomes of the surveys / assessments, focusing on a way forward in terms of how to address Surrey-wide and cross boundary issues.
- amend the methodology to make specific reference to certain groups that were considered as key stakeholders and whom should be engaged in the process.

2. Elmbridge Local Plan - Local Plan: Strategic Options Consultation (2016/17)

The consultation took place between 16 December 2016 and 24 February 2017.

Regarding the Strategic Matter of Travellers the following comments from Strategic Partners were made:

- Mole Valley District Council – cross referenced their response made to Elmbridge Borough Council's consultation on the draft GTAA (see below).
- Reigate & Banstead Borough Council – reference was made to the joint-methodology prepared between the two authorities and how they were advancing work that assessed options to meet their identified need. It was suggested that Elmbridge undertake an extensive call for sites exercise and consider whether need can be met.

3. Local Plan Evidence Base Preparation (2017)

• Gypsy & Traveller Accommodation Assessment (2017)

Engagement of the Draft GTAA (January 2017)

Engagement of a number of local authorities on the draft report as part of each commissioning authority's duty to cooperate responsibilities was undertaken in January 2017. This included mostly neighbouring authorities but also others within close proximity.

The aim of the consultation was to seek views on the draft report and resolve any issues from the outset prior to the report being finalised.

Responses were received from:

- Guildford Borough Council – expressed concern as to the low level of responses received and that this would result in an under-estimation of need. It was suggested that where it was identified that it was 'unknown' if someone / a household met the definition of a Traveller, these figures should be included in the need figure.

- London Borough of Richmond upon Thames – noted the references to Richmond, which accurately reflected the discussions had with ORS last year and is considered to remain the position on overall needs and cross-border issues. The content of the draft report was noted, and it was stated that the authority did not have any duty to co-operate comments to raise at this stage.
- Mole Valley District Council – stated that the number of households who either refused or were unavailable for interview clearly created a significant level of uncertainty, which is reflected in the pitch requirement of between 2 and 9 pitches. It was noted that only one interview was achieved with Gypsy and Traveller households living in bricks and mortar accommodation, and was therefore considered to present a gap in the council's understanding of needs arising from households who might retain a cultural preference for caravan dwelling.

However, it was recognised that this work was conducted at a particularly challenging time and that the change in the Planning Policy for Traveller Sites (PPTS) definition had created a great deal of sensitivity and uncertainty within Gypsy and Traveller communities, which was likely to have contributed to the low response rate.

It was also note that the GTAA analysed the needs of "unknown" households as far as is realistically possible and that it also contained an assessment of the needs of those who do not meet the travelling requirements of the 2015 PPTS. On that basis, it was stated that it would appear that the GTAA provided a pragmatic assessment of needs during the Local Plan period, based on the evidence which is available.

An update on their Local Plan position including evidence relating to the Strategic Matter of Travellers was also provided.

- Reigate & Banstead Borough Council – advised that they had no comment to make at the time.
- Royal Borough of Kingston upon Thames – noted that the figure on the number of pitches required had altered significantly downwards between the two GTAAs (2013 and 2017). However, it was recognised that this was largely due to the changes in the Government's definition of a Gypsy, Traveller and Travelling Showperson for the purposes of planning policy. It was also noted that the need figures have been assigned to members of the community not meeting the new definition. Therefore, the main findings of the report were accepted.

An update on their Local Plan position including evidence relating to the Strategic Matter of Travellers was also provided.

- Runnymede Borough Council – confirmed that they had no comment to make beyond what the report contained at page 27 under 'Runnymede Borough Council'. The Council requested that it be kept informed of further progress with

the GTAA.

- Surrey County Council – confirmed that they had no comment to make on the draft report.
- Tandridge District Council – stated that the GTAA was considered to be consistent in its approach and methodology to that taken by Tandridge DC as the same consultants have been used for both studies.

Minor amendments were made to the Final Draft Report to reflect the updates provided by local authorities in regard to:

- the position of their Local Plan and assessments of need; and
- updates on pitch provision.

4. Elmbridge Local Plan - Local Plan: Options Consultation (2019)

The consultation took place between 19 August and 30 September 2019.

No comments were received regarding the Strategic Matter of Travellers.

5. Local Plan Evidence Base Preparation (2019 – 2020)

- **The Gypsy, Traveller and Traveller Accommodation Assessment (GTAA) 2020**

As part of the council's commitment to prepare a Local Plan and ensure that its evidence base informing the policies and allocations is up to date, a review of the 2017 GTAA was undertaken in order to inform the preparation of the draft Plan (Regulation 19).

As national planning policy and guidance remained the same as when the 2017 methodology and assessment was jointly commissioned / produced, engagement on the update was limited to cross-boundary issues and updates associated with neighbouring authorities Local Plans', need figures and opportunities for provision.

Included within the GTAA 2020 (Chapter 5) is the conclusions of the stakeholder engagement which again, was completed through telephone interviews.

A total of three interviews were undertaken with officers from the study area (Elmbridge Borough) and from Surrey County Council. In addition, ORS interviewed officers from:

- Epsom and Ewell Borough Council
- Guildford Borough Council
- London Borough of Richmond upon Thames
- Mole Valley District Council
- Runnymede Borough Council

- Royal Borough of Kingston upon Thames
- Spelthorne Borough Council
- Woking Borough Council

These authorities represent those within the same Housing Market Area (HMA) and / or neighbouring authorities.

6. Elmbridge Local Plan - Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

The consultation took place between 27 January and 9 March 2020.

No comments were received regarding the Strategic Matter of Travellers.

7. Meeting accommodation needs

The needs of those residing in the borough

How the council intends to meet the identified need for new pitches in the borough is set out in the Gypsy, Roma and Traveller Site Assessment Update (2022).

Contributing to the Assessment Update has been discussions with Surrey County Council (date) who have confirmed that two additional (permeant) pitches will be made available at the public site (The Oaks, Woodstock Lane South) subject to legal proceedings being resolved. Surrey County Council manages the site on behalf of Elmbridge Borough Council.

The GTAA 2020 did not identify a need to provide a transit site however, recommended that the situation relating to levels of unauthorised encampments should continue to be monitored.

Work to provide a network of transit sites has however occurred during the preparation of the draft Local Plan to ensure that accommodation needs can be met across the wider-County area.

On 24 February 2021, the Council ratified the Cabinet decision to contribute the capital costs in respect of the establishment of a transit site in the east of the County and thereafter contributing to the ongoing management and maintenance costs of the site. It is envisaged that subject to receiving planning permission, the 10-pitch transit site would be developed in 2022/23.

The accommodation needs of Travellers from outside of the borough

In preparing the draft Local Plan, the council has considered if there is any unmet need for pitches / plots arising from neighbouring authorities. Through on-going discussions and from their own evidence base work and local plan preparation, the following conclusions have been made:

- Epsom & Ewell Borough Council – the 2017 GTAA did not identify a need for new pitches for Travellers that met the PPTS definition. EEBC is currently reviewing their evidence base in order to take forward the preparation of their Local Plan.
- Guildford Borough Council - since the last GTAA (2017), GBC has allocated 57 (net) Traveller pitches and 8 Travelling Showpeople plots within the Local Plan 2019. The need for pitches and plots within Guildford Borough (who meet the planning definition) is therefore being met in both the short and longer term.
- London Borough of Richmond upon Thames - LBR liaises with and asked the Richmond Housing Partnership to undertake surveys of occupants on sites in 2013 and 2015 to understand existing and future needs. The research (2016) found there is no unmet need for Gypsies and Travellers in the borough; the adopted Local Plan protects the existing pitches as needs will be met through the existing site.
- Mole Valley District Council – the latest assessment of need (March 2021) suggests that 32 pitches and 6 plots are requirement. MVDC’s draft Local Plan which has been submitted for examination, seeks to deliver 34 pitches on large residential sites (of over 100 bricks and mortar homes) and through appropriate intensification of existing sites. Proposals for Travelling Showpeople accommodation will be supported on previously developed land.
- Royal Borough of Kingston upon Thames – a GTAA was completed in September 2018 which identified that current provision does not meet need. It is intended that the outcome of the study will be used by the council to identify sufficient sites through the preparation of their new Local Plan. RBK is still considering options for its development strategy and is at the Regulation 18 Stage.
- Runnymede Borough Council - the last GTAA was used to inform the Local Plan which indicated the need for 83 pitches for Gypsies and Travellers and 19 Travelling Showpeople plots, up to 2030. The Local Plan was able to make provision for all 83 pitches. RBC have also allocated 10 Showpeople plots in the Local Plan. RBC is working through the review of its Local Plan (which commenced upon adoption) of how it can meet its future development needs including the need to provide the residual 9 plots for Travelling Showpeople.
- Spelthorne Borough Council – the latest GTAA (April 2018) identified a need for 3 pitches up until 2041 (who met the definition) and 15 plots for Travelling Showpeople. The draft Local Plan (Policy H3) states that SBC will make provision for the number of additional pitches / plots identified in the GTAA.
- Woking Borough Council – the latest GTAA identified a need for 19 pitches up until 2027 and a further 11 pitches up to 2040. Since the last GTAA, Woking have adopted the Site Allocations Plan. The Plan allocated several sites to provide 23 pitches up to 2027 and states that the residual need for up to 2040 will be provided for through a future review of the Site Allocations Plan or the Core Strategy.

On the basis of on-going cooperation and the issue of Travellers also being discussed at meetings with HMA partners and other neighbouring authorities (as set out in Strategic Matter 1), it is not considered that there is unmet need arising from neighbouring authorities that needs to be planned for and accommodated within Elmbridge. The need for new pitches / plots in neighbouring authorities, has been or will be addressed through their respective Local Plans.

8. Other Engagement Activities

Other Local Authorities' GTAA's

To assist neighbouring authorities with the preparation of their Local Plans including the evidence base, the council, where invited has provided comments on other GTAA's and requests as to the availability of pitches / plots within the borough. This includes for the following authorities:

- Guildford Borough Council
- Mole Valley District Council
- Reigate & Banstead Borough Council
- Runnymede Borough Council
- Spelthorne Borough Council
- Tandridge District Council

9. Boat-dwellers

As part of the evidence base to support the draft Local Plan and an assessment of the accommodation needs of all our communities, the council commissioned an assessment of the needs of boat-dwellers. In regard to Elmbridge this is principally in relation to those residing along the stretch of the River Thames from Weybridge to Thames Ditton.

In seeking to provide additional moorings to meet the level of need identified, the council has engaged with:

- London Borough of Richmond upon Thames
- Royal Borough of Kingston upon Thames
- Spelthorne Borough Council
- Surrey County Council
- Environment Agency

The list of Strategic Partners reflects those neighbouring authorities with a stretch of the River Thames within their borough or, as a potential owner of land along the Thames Riverbank. A summary of the responses received is provided below.

- Royal Borough of Richmond upon Thames – stated in an email dated 11 May 2022, that the Local Plan includes a presumption against new proposals for houseboats (Policy LP19) and that within Richmond borough, the River Thames is

designated Metropolitan Open Land (MOL) and therefore the character and openness of the river are safeguarded from inappropriate uses. It was highlighted that the London Plan 2021 further provides the policy framework in Policies SI 16 and Policy SI 17, and the issue was considered at the Examination in Public. The council's attention was drawn to paragraphs 537 and 538 in the Panel Report 2019. LBR also highlighted the London Mooring Strategy, produced by the Canal and River Trust, which has identified zones for potential additional moorings elsewhere in London.

- Royal Borough of Kingston upon Thames – stated in an email dated 10 May 2022, that officers were not aware of any land owned by Kingston Council that could be available for additional permanent moorings, therefore the RBK was unable to assist in meeting this identified need.
- Spelthorne Borough Council – advised in an email date 26 May 2022, that the council own a number of riverside landholdings adjacent to the Thames and that there have been a number of issues in the past with moorings generally and residential ones in particular (including enforcement action either from Planning or Neighbourhood Services). It was stated that there are also a range of complexities around access to such sites, landing stages and the facilities that need to be provided for such residential moorings. The view of SBC was therefore that it would be very difficult to accommodate any of their own demand let alone from an adjoining borough, so did not believe they were in a position to assist.
- Surrey County Council – advised in an email dated 18 May 2022, that they are not aware of any appropriate opportunities in terms of the County Council's landholdings to accommodate permanent residential moorings. It was stated that currently, there is also a particular need to avoid compromising other County Council needs/service requirements affecting identified County Council owned riverside opportunities, for example land that could be part of the River Thames Scheme.
- Environment Agency – stated in an email dated 10 May 2022, that they currently we do not have land within their ownership available for permanent residential moorings on the River Thames in Elmbridge Borough or neighbouring areas. The responses stated that if in the future the EA were undertaking a review of their land assets and the situation changes, they would update the council.

Category	Details
Summary of outcomes from strategic working:	<ol style="list-style-type: none"> 1. A robust methodology for the assessment of the accommodation needs for Travellers which is widely used by Surrey authorities, providing a consistent approach. 2. A robust and credible assessment of accommodation need which has been informed via the engagement of neighbouring authorities.

	<p>3. Opportunities to meet additional need for pitches on The Oaks, Claygate.</p> <p>4. The agreement to provide a transit site in the east of the County and the council's commitment to the capital cost and on-going management and maintenance costs of the site.</p> <p>5. A robust methodology for, and the assessment of, the accommodation needs of Boat dwellers.</p>
Links to the draft Local Plan:	<ul style="list-style-type: none"> • The Vision – Elmbridge 2037 • Principle 3 – Delivering homes for residents • Policy SS2 – Sustainable place-making • Policy SS3 – Scale and location of growth • Policy HOU2 – Optimisation of sites • Policy HOU7 – Gypsy, Roma, Traveller and Travelling Showpeople accommodation • Policy INV6 – River usage
On-going cooperation:	<p>1. The council will continue to work with Surrey Authorities and the County Council to provide a transit site within Surrey and contribute towards the capital cost and on-going management and maintenance costs of the site.</p> <p>2. Statements of Common Ground (SoCGs) or updated SOCGs will be sought with each HMA Partner and neighbouring authorities to cover all relevant Strategic Matters including Travellers and Boat Dwellers.</p>

Strategic Priority A) Housing (including affordable housing), employment and retail, leisure and other commercial development

Strategic Matter 3: Employment, retail and other commercial development

Category	Details
Strategic Planning Issue:	Delivering Economic Growth - Planning for the jobs / floorspaces needed in Elmbridge and the wider area, allocating employment land and working cooperatively to drive economic growth and ensure that our strategy does not undermine those of neighbouring authorities.
Strategic Partners:	<ul style="list-style-type: none"> • Greater London Authority • Guildford Borough Council • Heathrow Strategic Planning Group • London Borough of Richmond upon Thames • M3 Enterprise LEP • Mole Valley District Council • Royal Borough of Kingston upon Thames • Runnymede Borough Council • Spelthorne Borough Council • Surrey County Council • Surrey Futures Board • Woking Borough Council
Key Evidence Base:	<ul style="list-style-type: none"> • Elmbridge Economic Strategy 2019-2023 • Commercial Property Market Study (2014) • Baseline and Functional Economic Area (2016) • Elmbridge Retail Assessment (2016) • Elmbridge Commercial Property Report (2017) • Local Market Appraisal (2020) • Retail Centres Boundary Review (2021) • Strategic Employment Land Review (2021) • SA/SEA • Surrey's 2050 Place Ambition

This section is set out as follows:

- 1. Local Plan Evidence Base Preparation (2015 – 2016)**
- 2. Elmbridge Local Plan - Local Plan: Strategic Options Consultation (2016/17)**
- 3. Elmbridge Local Plan - Local Plan: Options Consultation (2019)**
- 4. Elmbridge Local Plan - Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)**
- 5. Local Plan Evidence Base Preparation (2019 – 2020)**
- 6. Other engagement activities**

Actions:

The above Strategic Partners have been engaged throughout the preparation of the new Elmbridge Local Plan including at the Regulation 18 consultation stages and in the preparation of the council's evidence base. Key activities have been set out below.

1. Local Plan Evidence Base Preparation (2015 – 2016)

• **Functional Economic Area and Baseline (2016)**

In 2015, the council commenced work on the above report with the aim of establishing the functional economic area (FEA) within which Elmbridge is located and the boroughs and districts that the council would need to work in order to ensure an effective supply of employment land to meet the needs of business.

On 11 March 2016, the council approached adjacent local authorities and other Strategic Partners to obtain their feedback in relation to the methodology used in the FEA and Baseline Review. This was to enable Strategic Partners the opportunity to suggest amendments to the methodology, make comments and highlight any areas of disagreement or inconsistency.

The council received feedback from six of the bodies consulted, the majority of them concurring with the council's findings and methodology. The key points raised were:

- Mole Valley District Council concurred with the conclusion of the methodology and report that the closest links are with Runnymede and Spelthorne and agreed that there are some linkages with Mole Valley but that Mole Valley does not form part of the FEA.
- Runnymede Borough Council noted in the conclusions of the report in relation to Runnymede, in particular that the borough is one of the primary authorities that Elmbridge Borough Council needs to work with in relation to cross boundary strategic matters relating to employment moving forwards.
- Surrey County Council generally supported the report's conclusions as to the extent of the FEA in which Elmbridge is located and the relevant local planning authorities with which the Borough Council must work in order to fulfil the Duty to Cooperate. It was raised that it was also important to continue to consult with the County Council and the Enterprise M3 LEP and also the GLA on analysing economic and employment trends.

- Spelthorne Borough Council concurred with the conclusions set out in the report which find that Elmbridge, Epsom and Ewell, Mole Valley and Richmond all sit within the same HMA. The strongest commuter links between Elmbridge and the surrounding London and Surrey authorities, including Spelthorne, were also acknowledged. The links identified between Elmbridge and Staines upon Thames town centre for comparison shopping were noted. Overall it was believed that the draft FEA report takes account of the relevant factors for determining a FEA.
- Richmond Borough Council stating support for the conclusions to progress economic work through joint working but that officers had no further detailed comments to raise at the time.
- Royal Borough of Kingston upon Thames sought clarification within the baseline report that the borough was not a Strategic Industrial Location (SIL), but that the borough contains two SILs. A number of questions regarding our existing employment policies were also raised to assist the council in preparing their own Local Plan.
- **Retail Needs Assessment (2016)**

In preparation of the above Assessment, on 5 June 2015 the council approached the adjacent local authorities and other Strategic Partners to see if they were interest in commissioning a joint Assessment. The email stated that joint working would allow consistency in approach and would clearly show how we have worked together across a wide area.

Guildford, Runnymede and Spelthorne Borough Councils and the London Borough of Richmond upon Thames confirmed that their own work looking at retail needs had either been completed recently or was near completion. Thus, not in a position to enter into joint working. There was, however, a recognition of the strategic nature of retailing that requires cooperation. Mole Valley District Council stated they would be interested in joint working although following informal discussions, this was not progressed.

As part of the preparation of the Assessment, the council engaged Strategic Partners on the draft methodology between 28 July and 12 August 2015. The purpose of this activity was to provide Strategic Partners the opportunity to provide feedback on the proposed approach, allowing any potential deficiencies or inconsistencies to be addressed before the study is at an advanced stage of preparation.

Surrey County Council responded to state they had no comments. Epsom & Ewell Borough Council, London Borough of Richmond upon Thames, Mole Valley District Council and Spelthorne Borough Council all responded stating that the proposed approach appears reasonable, consistent with national policy and guidance and, where relevant, their own assessments.

Runnymede Borough Council also responded stated that the approach by and large looked to be compliant with national policy. A number of specific questions were raised, and the council responded to these. A summary is set out below:

- Comment - there is no specific mention of the nighttime economy per se.
Response - the council clarified that leisure elements of the survey would cover this.
- Comment - from the information provided it was not clear whether the extent of town centres and primary shopping areas based on a clear definition of primary and secondary frontages in designated centres, would be provided. As such, it was

assumed that officers would undertake this work themselves.

Response – the council advised that officers would undertake the required work to define these boundaries and the Retail Assessment was not looking to do this, just to provide the required evidence base.

The council sought comments on the draft retail assessment from neighbouring authorities and relevant Strategic Partners between 8 and 29 April 2016. This allowed any potential deficiencies or inconsistencies to be raised prior to the Assessment being finalised. Comments were received from the following:

Mole Valley District Council – stated they had no substantive comments to make confirming, the document would be considered when preparing their own Local Plan. It was suggested that the section related to the 'Transform Leatherhead' project be updated to reflect recent progress.

Spelthorne Borough Council response: stated that overall the study provided a comprehensive overview of the planning policy background and general trends within the retail and leisure sectors. It was stated that the conclusions drawn appeared logical.

Surrey County Council response: stated they had no comments to make.

2. Elmbridge Local Plan - Local Plan: Strategic Options Consultation (2016/17)

The consultation took place between 16 December 2016 and 24 February 2017.

Regarding the Strategic Matter of employment, retail and other commercial development, responses were received from the following Strategic Partners:

- Greater London Authority stated that it would be useful to explore relevant economic linkages with London to understand and plan for the role of Elmbridge in the shared market area for industrial and logistics provision.
- London Borough of Richmond upon Thames noted that Elmbridge was commissioning further evidence to take account of the new Local Plan timescales and to consider changing economic circumstances, such as the decision to leave the European Union. It was also noted that in previous Duty to Co-operate discussions the two authorities had not identified any strategic or cross boundary issues on this matter, and that the two authorities share a similar approach to protecting employment areas.
- Runnymede Borough Council welcomed further discussions around any potential amendment of the Green Belt boundary in the Brooklands area to accommodate further economic development.
- Spelthorne Borough Council stated that although at an early stage of development, initial consideration should be given to the various impacts of the possible expansion of Heathrow Airport, such as increases in employment and that this could potentially reduce the amount of employment land required in the borough and subsequently free up space for other uses.

3. Elmbridge Local Plan - Local Plan: Options Consultation (2019)

The consultation took place between 19 August and 30 September 2018.

Only the response from the Spelthorne Borough Council raised issues relating to the Strategic Matter of employment, retail and other commercial development. Their response stated that further consideration should be given to the relationship between each option and employment needs, as well as how other development needs will be met in the borough.

The response also stated that Spelthorne Borough Council remained committed to the continued positive partnership working with Elmbridge Borough Council and other partners through the Heathrow Strategic Planning Group to identify how the employment needs in the area surrounding Heathrow Airport will be met in future years.

4. Elmbridge Local Plan - Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

The consultation took place between 27 January and 9 March 2020.

Regarding the Strategic Matter of employment, retail and other commercial development, responses were received from the following Strategic Partners:

- Mole Valley District Council noted that in parallel with Elmbridge, Mole Valley's economy and services are reliant on an in-commuting workforce. Their responses supported Elmbridge's approach that future commercial floorspace needs will be accommodated through the redevelopment / intensification of existing employment land in the borough. Mole Valley sought clarification that Elmbridge Borough Council was not looking to Mole Valley to provide for any unmet employment land need.
- Royal Borough of Kingston upon Thames stated that whilst promoting employment in mixed-use development, this should not preclude the incorporation of housing as part of the mixed-use scheme, where compatible and feasible.

5. Local Plan Evidence Base Preparation (2020 – 2022)

- The Local Market Appraisal 2000

The Local Market Appraisal (LMA) assessed the existing industrial and commercial sites, and the office and retail use in our town centres. The LMA included policy recommendations for the draft Local Plan for economic growth and development whilst considering local market conditions.

In preparing the assessment, the appointed consultants looked at comparable data e.g. trends, vacancy rates and floorspace rental rates, from neighbouring boroughs and districts.

6. Other Engagement Activities

Surrey 2050 Place Ambition

In July 2019 the Surrey Future Steering Board launched "Surrey's 2050 Place Ambition" to facilitate good growth and published for consultation 'Our approach to place leadership, infrastructure and good growth'.

The Ambition is an agreed growth strategy for Surrey which sets out four long term strategic priorities and eight identified Strategic Opportunity Areas, which will be shaped and delivered within the context of the shared growth vision, principles and values.

As part of its evolution, the Place Ambition has been looked at to reflect the current planning context, especially the challenges around economic recovery (post Covid-19 pandemic) and the increasing weight being given nationally to climate change, biodiversity, health and well-being and improving the quality of developments.

In December 2021, on behalf of Surrey Future, Surrey County Council published and sought comments on Surrey's 2050 Place Ambition - Spatial Framework: A Strategic Vision for Place Leadership, Infrastructure & Good Growth Draft Version 2. Published alongside Draft Version 2 of the Surrey 2050 Place Ambition, is an Implementation Framework which was also the subject of this consultation.

Under Strategic Priority 2: Enhancing the place offer of Surrey's towns, the Ambition states that our urban areas will continue to be where most of Surrey's homes, services and jobs are located. It has identified that focusing growth in these areas will provide the greatest opportunity to support access to services and cultivate changes in the way that we travel, both within urban areas and between different places. With three quarters of the land in Surrey being covered by Green Belt and national and international environmental designations there is a need to make effective use of our urban areas.

The Ambition identifies the larger centres of Guildford, Reigate/Redhill, Staines and Woking in particular, as areas which will continue to provide the greatest potential for delivering a strong residential and economic offer, and will be key in enhancing Surrey's transport connectivity.

The Ambition then identifies 25 towns of strategic significance. Nine of these are primary centres that serve the wider regional economy and are the focus of development in Local Plans and emerging plans or are also the focus of LEP activity given their strategic role. None of the nine towns are within Elmbridge borough.

Walton-on-Thames, Weybridge, Esher & Cobham are however, in the list of 25 towns of strategic importance but are secondary centres that play a significant function but serve a less extensive catchment. The Ambition identified that the growth potential of these towns is set out in the local plans and many of the centres have the potential to accommodate growth which will enable residents to meet many of their retail and leisure needs without having to travel to larger neighbouring centres.

Strategic Priority 3: Maximising the potential of our Strategic Opportunities Areas (SOA), identifies those areas with the greatest long-term potential for delivering 'good growth' across Surrey by investing in places that offer opportunities to boost productivity by maximising the value of strategic assets such as universities, transport hubs and strategic employment sites / centres to support our economic strengths and priority industrial sectors.

The Woking Hub incorporates areas of Woking, Guildford and Elmbridge boroughs. It comprises much of the borough of Woking but also the Brooklands employment area (part in Elmbridge Borough) and the strategic new settlement at the former Wisley airfield.

In regard to Elmbridge Borough, the Ambition identified the A245 corridor as an important route economically as it provides access from the A3 to the Brooklands Business Park in Elmbridge. This is a sub-regional, strategic employment centre, home to some 200 businesses in a mix of premises ranging from high quality international headquarters to large format warehousing and distribution centres and light industrial buildings on the Brooklands Industrial Estate. The broader Weybridge economic cluster is also identified as it supports an additional 8,000 jobs and Brooklands Further Education College (Weybridge campus) provides valuable training in technical skills.

To deliver the priority outputs identified for the SOA, the council is working with the County Council, Guildford & Woking Borough Councils and other delivery partners e.g. infrastructure providers and regulatory bodies.

Category	Details
Summary of outcomes from strategic working:	<ol style="list-style-type: none"> 1. The identification of our FEMA and neighbouring authorities for which the council needs to engage. 2. Evidence base on strategic and local employment markets including emerging trends and demand for office and retail accommodation. 3. Identification of Walton-on-Thames, Weybridge, Esher and Cobham as important towns within the County. 4. Identification of Brooklands, Weybridge as part of the Woking Hub SOA and plans for future investment in order to deliver the priorities for the area.
Links to the draft Local Plan:	<ul style="list-style-type: none"> • The Vision – Elmbridge 2037 • Principle 4 – Growing a prosperous economy • Policy SS2 – Sustainable place-making • Policy SS3 – Scale and location of growth • Policy EC01 – Supporting the economy • Policy EC02 – Strategic employment land • Policy EC03 – Supporting our town, district and local centres • Site allocations
On-going cooperation:	<ol style="list-style-type: none"> 1. Continued joint working with Surrey County Council, Guildford & Woking Borough Councils and other delivery partners to develop and implement the priority outcomes for the Woking Hub SOA. 2. Statements of Common Ground (SoCGs) or updated SOCGs will be sought with each HMA Partner and neighbouring authorities to cover all relevant Strategic Matters including Employment / Retail.

Strategic Priority B) Infrastructure for transport; telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)

Strategic Matter 4: Transport

Category	Details
Strategic Planning Issue:	<p>Whether the additional demand on the road network (both strategic and local), as a result of new development planned for within the borough and in our neighbouring authorities' areas, can be accommodated and / or mitigate.</p> <p>Enabling a modal shift towards more sustainable modes of travel (including walking and cycling).</p>
Strategic Partners:	<ul style="list-style-type: none"> • Epsom & Ewell Borough Council • Guildford Borough Council • National Highways • London Borough of Richmond upon Thames • Mole Valley District Council • Network Rail • Royal Borough of Kingston upon Thames • Runnymede Borough Council • South Western Railway • Spelthorne Borough Council • Surrey County Council • Surrey Futures Board • Transport for London (TfL) • Transport for the South East • Woking Borough Council
Key Evidence Base:	<ul style="list-style-type: none"> • Surrey Strategic Infrastructure Study (2017) • Infrastructure Delivery Plan (2018, 2019, 2022) • Transport Assessment (2022) • SA/SEA • Surrey's 2050 Place Ambition

This section is set out as follows:

- 1. Surrey Strategic Infrastructure Study (2017)**
- 2. Elmbridge Local Plan - Local Plan: Strategic Options Consultation (2016/17)**
- 3. Local Plan Evidence Base Preparation (2018 – 2019)**
- 4. Elmbridge Local Plan - Local Plan: Options Consultation (2019)**
- 5. Local Plan Evidence Base Preparation (Summer 2019 – January 2020)**

6. Elmbridge Local Plan - Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

7. Local Plan Evidence Base Preparation (2020 – 2022)

8. Summary of the latest position with Surrey County Council, National Highways and TfL

9. Other Engagement Activities

Actions:

The above Strategic Partners have been engaged throughout the preparation of the new Elmbridge Local Plan including at the Regulation 18 consultation stages and in the preparation of the council's evidence base. Key activities have been set out below.

In addition, SCC in 2017 published the Surrey Strategic Infrastructure Study as part of initial work undertaken on the Surrey Local Strategic Statement (LSS). The details of the Study insofar as Elmbridge Borough have been summarised below for context as, this formed part of the early evidence informing the first Regulation 18 consultation.

1. Surrey Strategic Infrastructure Study (2017)

The council has worked in partnership with the County Council and other Surrey boroughs and districts to produce the Surrey Strategic Infrastructure Study 2017.

Each of the boroughs and districts has an existing or emerging local plan that sets out the planned development across its area and the infrastructure needed to support it in the short to medium term. This Study brings these plans together to provide a 'snap-shot' reflecting the position as at June 2017 and presents an overview of growth and infrastructure at the strategic level across Surrey and to highlight to government, infrastructure providers, developers, local communities and businesses the scale of investment required.

A wide range of stakeholders were engaged to inform the study including county and district council service providers, transport operators, utility companies, higher education providers, Clinical Commissioning Groups, the Environment Agency, Surrey Nature Partnership and the Coast to Capital and Enterprise M3 Local Economic Partnerships.

In regard to the Strategic Matter of Transport, the Study identified three priority areas for the borough:

- A3 between Esher and M25 Junction 10 traffic congestion
- Current trends indicate that the A3 from Hook to Guildford is likely to be more highly congested.
- South West Mainline capacity increases planned for peak AM times requires station platform lengthening.

2. Elmbridge Local Plan: Strategic Options Consultation (2016/17)

The consultation took place between 16 December 2016 and 24 February 2017.

Regarding the Strategic Matter of Transport, responses were received from:

- Epsom & Ewell Borough Council – stated that the provision and delivery of an appropriate level of infrastructure to support future growth is imperative for ensuring that sustainable development is achieved. Noted the existing capacity issues and welcomed further discussion between the councils and with the Royal Borough of Kingston upon Thames and relevant parties in relation to this strategic issue.
- Greater London Authority / Transport for London – highlighted the potential benefit from the additional capacity and connectivity provided by Crossrail 2 which could assist in delivering higher levels of growth in appropriate locations. The response highlighted those areas of the road and bus network extending into Elmbridge but operated by Transport for London (TfL). It was stated that the impacts of new development on travel demand for both road and rail including train, station, bus and road junction capacity will need to be assessed and the effects of cross boundary travel within London be considered.

In general terms TfL stated it would support an overall approach that aimed to maximise the benefits from planned rail investment by focusing new development and increasing development densities in locations that are highly accessible to rail stations. Following good practice, it was stated that any large-scale growth proposed in places without direct rail access will have to be carefully planned and supported by bus and cycle routes to the nearest stations in order to reduce new car trip generation. The potential development of Local Area 58 and its proximity to the London Boundary was raised. It was stated that a rigorous assessment of the transport impacts on all modes of transport including cross boundary impacts within London would be required.

It was highlighted that TfL is looking at options for the A3 junction with the A243 Hook Road and A309 Kingston Bypass and that to enable these works some land may need to be safeguarded.

- National Highways – set out their responsibilities and areas of interest in terms of the Strategic Road Network and the development of the Local Plan. It was noted that the Consultation Document refers to the impact of additional development on both the local and strategic road networks (SRN) and that this will be considered through detailed modelling and a Transport Assessment. It was stated that the council will need to provide sufficient evidence to demonstrate the proposals have no residual severe impacts on the operation of the SRN or provide proposals to mitigate such impacts to an acceptable level.

Reference to previous meetings between the council, County Council and National Highways (November 2016) were referenced and the update of the SINTRAM model in this timeframe, and that a new updated methodology for the model will be implemented so there is a more collaborative approach to Local Plans with the Surrey County Council area.

- Mole Valley District Council – highlighted that two Strategic Areas identified for potential development sat to the north of the boundary with Mole Valley. It was stated that development in these areas may put additional pressure on the local road network (including the A244 and A245), which is especially relevant given that there is a relationship between Elmbridge and Mole Valley in terms of commuters travelling to work in both directions. The Council looked forward to seeing further evidence about strategic highways issues, which included consideration of cross boundary impacts.
- Network Rail – stated that development in and around railway stations in the area is encouraged with a high population density. Requested to be informed of any such

development to ensure that it does not negatively impact upon the railway station or any other assets they may have in the area.

- Royal Borough of Kingston upon Thames – it was noted that infrastructure, particularly for transport, does not respect borough boundaries and this should be acknowledged and addressed. It was stated that the Royal Borough was looking to work closely with Elmbridge as well as Transport for London to find strategic, cross-boundary solutions to the traffic and local environmental issues arising from the A3. These strategic solutions will involve both Kingston and Elmbridge, including the funding. The potential development of Local Area 58 was highlighted and that the two authorities will need to work together to ensure that impacts are mitigated.
- Surrey County Council – stated that the impact of new development including congestion and air pollution should be addressed by encouraging more sustainable travel patterns including modal shift through increased walking and cycling. Existing policies to protect and improve infrastructure such as footpaths, bridleways and cycle paths and the requirement for major development to prepare travel plans was therefore encouraged. It was suggested that these should include modal shift targets with behavioural change indicators to measure and monitor success.

It was noted that initial strategic transport modelling was underway and that this will help to inform the approach to be taken forward in the Local Plan, following the current strategic options consultation. The need for more detailed transport modelling at the next stage in taking forward the local plan: when the preferred option for development is decided, was highlighted. It was also commented that it will be important to ensure that developers properly contribute to the provision of appropriate infrastructure, including towards additional transport infrastructure mitigation, which will be required because of additional pressures generated by their developments.

3. Local Plan Evidence Base Preparation (2018 – 2019)

- **Infrastructure Delivery Plan (IDP) 2018**

The IDP (December 2018) identified the current baseline in relation to existing infrastructure in the borough. It also identified main areas of responsibilities and where possible, details of planned provision and potential provision required as a result of the Local Plan.

The IDP was prepared with the involvement of relevant stakeholders and based on information that the council managed to obtain from a range of sources including meetings with stakeholders, feedback received during previous consultations (pre-2018) and through direct stakeholder consultation between 30 April and 1 June 2018.

The IDP identified know improvements to the strategic and local road networks and stated that the council was working with National Highways and Surrey County Council to prepare a Transport Assessment that would inform and support the preparation of the new Local Plan. At this stage in the process it was highlighted that the assessment would utilise the County Council's Transport Model and will be split into the following stages:

- Stage 1 – 2031 Do Minimum (with committed development but without Local Plan allocations)
- Stage 2 – 2031 Do Something (with committed development and Local Plan allocations but no mitigation)
- Stage 3 – 2031 Transport Mitigation (with committed development and Local Plan

allocations and transport mitigation)

- **Transport Assessment**

In support of the draft Local Plan, including policies directly relating to the provision of infrastructure and also the allocation of sites, a Transport Assessment has been prepared by WSP. The decision to commission consultants was made on the basis of the capacity of Surrey County Council (as the Highway Authority) to support the preparation of the Elmbridge Local Plan at the time. The County Council have been an active partner in the process and engaged with the council and WSP throughout.

In regard to the Transport Assessment, the following key activities took in 2018 – Summer 2019.

Agreeing on the extent of the study area

Towards the end of 2018 early discussions were held between the council and WSP as to the extent of the study area that should be covered by the transport modelling. Defining the study area is an important part of the process as the boundaries would be used to cordon the SINTRAM model to the area of interest and used to carry out the Local Plan Transport Assessment.

From discussions with the consultants and in line with guidelines set by Transport for London, the study area was drafted as the borough of Elmbridge and a 2km buffer around the borough boundary.

Following engagement with the County Council and National Highways, further adjustments were then made to the boundary, so the study area would include areas and junctions of importance:

- An inception meeting was held with the County Council on the 12th December 2018 at which it was suggested that the study area boundary was extended to account for the northern part of the M25 Junction 9. The County Council highlighted the importance of this junction, as the A243 acts as a cut-through between the M25 Junction 9 and the A3 near Chessington.
- A following meeting was held with National Highways on the 14th December 2018. It was proposed at the meeting that the study area boundary was extended further north to encompass the M3 Junction 1, also north up to the A316 Country Lane laybys. Highways England highlighted the importance of this junction, and the A316 for which they also hold responsibility.

On 11 April 2019, both the County Council and National Highways were formally consulted on the proposed study area. Following further comments from National Highways received 17 April the study area was extended to include Junction 11 of the M25 as well as Junctions 9 and 10.

Agreeing the approach to the base year local model refinement

Following the agreement of the study area, the council and WSP worked with the County Council and National Highways to agree the approach to the base year local model refinement.

On 3 June 2019, WSP circulated a technical note which described the approach to the

base year sub-area model validation, seeking comments from National Highways. Following an initial meeting in June to discuss the details of the technical note, a series of emails were exchanged between WSP and National Highways England throughout June, July and August 2019. The principal issues raised and discussed were:

- the inclusion of committed Local Plan growth arising from relevant neighbouring authorities;
- the inclusion of windfalls in the appropriate development scenarios for the borough which were to be tested (Scenarios 2-5);
- how internalised trip rates would be calculated and how these would apply to different geographies in the borough; and
- the trip rate assumptions proposed related to the housing mix assumptions being made in the emerging Local Plan.

4. Elmbridge Local Plan: Options Consultation (2019)

The consultation took place between 19 August and 30 September 2018.

Regarding the Strategic Matter of Transport, the following comments were made:

- Greater London Authority – highlighted that Elmbridge is located within the new London Plan’s Strategic Infrastructure Priority “South West Mainline, Cross Rail 2 South West (London -Surrey / Southern Rail Access to Heathrow)”. It was stated that Cross Rail 2 could present additional capacity on the network and encouraged the council to consider the opportunities presented by this additional capacity including optimising development around stations that will benefit from investment. It was also stated that given the proximity of the borough to London, consideration should be given to extending the objectives of the Mayor’s Transport Strategy including rebalancing the transport system towards walking, cycling and public transport improving air quality and reducing road danger.
- National Highways – no particular comments were made in regard to the spatial strategy options within the current consultation. The on-going dialogue with the council concerning the assessment methodology of the potential impacts upon the SRN was acknowledged. It was stated that the council may wish to examine the relative impacts of different spatial strategies upon the SRN as this may assist in determining the relative merits of the different options. Their main interest however was stated as the impacts and mitigation (if necessary) of the detailed spatial strategy that the council intend to progress to Examination in Public in the coming months.

Finally, it was highlighted that one of their growing concerns was air quality and the impact of development traffic contributing to emissions from traffic on the SRN. It was stated that they shall be paying particular attention to air quality matters in future and stress the need for appropriate monitoring.

- Mole Valley District Council – identified the Options under which sites would be developed close to the boundary of the two authorities. It was stated that the development of these sites would put additional pressure on the local road network (including the A244 and A245). It was stated that the council would like to be assured that cross-boundary highways impacts relating to these potential site allocations have or will be explored in full, to ensure that congestion is not made any worse and that any opportunities to improve highway capacity are secured.
- Royal Borough of Kingston upon Thames – highlighted that some Options would see

the allocation of large development sites on the boundary of the two authority areas and that this could impact on their residents. Welcomed continued discussions on how each authority could meet its development needs in accordance with the principle of sustainable development and other policies of the NPPF.

- Spelthorne Borough Council – welcomed further engagement regarding strategic transport and infrastructure issues, in addition to ongoing discussions across the surrounding area to increase understanding regarding the implications of the Heathrow expansion. Highlighted that as set out in the shared Statement of Common Ground, Spelthorne looks forward to working with Elmbridge to improve transport movements through Walton Bridge and the A244. Once the transport modelling for both Local Authorities' Local Plans is complete, engagement on this matter will progress.
- Surrey County Council – stated that once the sites to be taken forward are identified, modelling and analysis work can be undertaken to review the implications of proposed development on the provision of county council infrastructure and measures that may be required to mitigate any specific impacts. The County Council welcomed the reference in the consultation document to the use of developer contributions to ensure the timely delivery of the infrastructure to support the planned growth.

It was acknowledged that the County Council as the Local Highway Authority for Surrey had been working closely with the borough council's transport consultants commissioned to undertake the highway assessment, specifically on the modelling methodology and providing access to the county transport model. This had included taking part in discussions with National Highways. The current liaison was appreciated, and it was requested that this continued into the output analysis and mitigation identification stages, including ensuring the relevant mitigation meets National England requirements. It was stated that it was important to ensure that a Statement of Common Ground relating to transport impacts and appropriate mitigation is agreed by relevant parties at the Regulation 19 stage and well in advance of the Examination process to avoid any delays to the current timetabled targets.

It was also noted that the document states that some options will increase pressure on highways, particularly at peak times. The County Council stated it would want to see the impact of development proposals on air quality quantified, whilst also including mitigation to help prevent poor air quality.

- Transport for London – it was noted that the Local Plan will have an impact on road networks in adjoining London boroughs such as Kingston and Richmond, particularly where growth is proposed close to the borough boundaries e.g. at Long Ditton, and that this could put pressure on the public transport system within Kingston / Surbiton as they present quicker connections to Central London. As such, it was stated that developer contributions may be required to provide improvements to the road network and improved public transport connectivity or increased capacity.

Comments made previously regarding Crossrail 2 and the potential benefits / opportunities were re-iterated as well as extending some of the Mayor's strategic transport policy objectives set out in the Mayor's Transport Strategy.

Finally, it was stated that transport authorities for adjacent boroughs should be referred to in the Infrastructure Delivery Plan (IDP) and suggested additions to the IDP were made.

5. Local Plan Evidence Base Preparation (Summer 2019 – January 2020)

• Infrastructure Delivery Plan (IDP) 2019

The council updated and published the IDP in August 2019. In updating the IDP, the council asked infrastructure providers to consider the impact of delivering 623 every year during the plan period and sought comments on the document between 14 November and 16 December 2019.

Responses were received from the following:

- National Highways – confirmed they had no comments to make.
- Transport for London (TfL) – in regard to the proposed route and implementation of Cross Rail 2, two sites were identified that would need to be safeguarded from development.
- Network Rail – stated they were not in a position to provide a detailed response in regard to the specific infrastructure improvements that may be required as a result of the Borough's proposed housing growth. It was stated that when strategically planning the proposed housing growth within the Borough, it was key that the developments are assessed to understand their impact on railway stations and level crossings. For instance, the potential intensification of the urban setting around Summer Road Level crossing could potentially affect the safety risk at the crossing.

It was stated that in certain cases, Network Rail may require future developers of the residential sites to make financial contributions (via Section 106 process) to mitigate against the impact of their developments on stations and/or level crossings.

Through on-going discussions with Surrey County Council, it was confirmed that the infrastructure requirements to support the delivery of the Local Plan would be born out of their engagement in the Transport Assessment.

• Transport Assessment

In regard to the Transport Assessment, the following key activities took in Summer 2019 to January 2020.

Agreeing the forecasting approach

Over the summer of 2019 up until October, discussions took place in regard to the forecasting approach. In June 2019, WSP provided a Forecast Methodology document for comment which had been drawn together following discussions held with National Highways, Surrey County Council and Elmbridge Borough Council.

The principal issues raised and discussed were:

- the forecasting considering previous work completed by the County Council for Runnymede (2017) and Tandridge (2018);
- how the trip rates for Wisely Airfield were to be incorporated into the model; and
- whether the updated trip rates using the 2018 surveys and uploaded into the TRICS database.

As a consequence of the COVID-19 pandemic and resulting restrictions, progress on the

Transport Assessment slowed with the capacity of WSP significantly reduced. A draft report was prepared over the Summer of 2020 and provided to the Council in September 2020.

The Phase 1 Transport Assessment (P1TA) assessed a maximum growth scenario for homes and jobs in Elmbridge, having regard to available and future deliverable transport capacity. The P1TA was based on an agreed set of development assumptions and was prepared using the agreed assessment methodology with SCC and National Highways following the engagement outlined above.

6. Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

The consultation took place between 27 January and 9 March 2020.

Regarding the Strategic Matter of Transport, comments were received from:

- Epsom & Ewell Borough Council – it was stated that the identification of a preferred option in order to fully understand and discuss potential strategic cross boundary issues would be welcomed.
- Surrey County Council – it was stated that the aspiration to provide well connected homes and opportunities for sustainable travel be increased. It was suggested that consideration is given to the healthy planning principles set out in the recent guidance: Creating Healthier Built Environments - Guidance for health and local planning in Surrey (Jan 2020).

7. Local Plan Evidence Base Preparation (2020 – 2022)

• Transport Assessment

In regard to the Transport Assessment, the following key activities took place between 2020 and June 2022.

Engagement on the modelling

WSP, Elmbridge and SCC met to discuss the P1TA on 23 November 2020, focusing on the outcomes of the report (i.e. the modelling of the high growth scenario). In order to finalise the modelling of mitigation option, it was agreed that SCC would update the amalgamated list of transport schemes (active travel and highways) identifying those which were strategic improvements to be run through the transport model.

SCC were sent this request on 27 November 2020 and asked to populate the mitigation list with clarification on the status (e.g. committed with funding in place, committed with no funding in place, ambition etc.) and delivery timescale of the schemes. It was also requested that SCC indicate if any should be tested as 'strategic improvements' where they may effect journey times or lead to additional queue lengths on the network.

On 18 January 2021, WSP; the council; SCC and National Highways met to discuss the progress made with the TA and the latest phase of the modelling. The meeting focused on the approach to the assessment using SINTRAM, the results of the assessment, and mitigation measures.

During the meeting the following issues were raised by National Highways:

- Consideration of the M25 J11 improvements within the Elmbridge Local Plan forecast scenarios;
- Assessment of merges and diverges using DMRB approach and possibly LinSig modelling for the Strategic Road Network junctions.

In addition, SCC and National Highways requested to see the Base Year Model Refinement Report. The Report was finalised at the beginning of 2020 and its refinement followed the approach agreed with SCC & National Highways previously (as set out above). The Report was sent to both SCC & HE on 21 January 2021.

There were on-going discussions between WSP with the council, SCC and National Highways regarding the potential inclusion of the M25 J11 improvements within the forecast scenarios. In an email from WSP to National Highways dated 10 March 2021, the position of SCC and the council on the matter were outlined as follows:

SCC position:

“Given:

- a) we do not have an agreed scheme yet; and
- b) the difficulty of modelling the operation of the junction in a strategic model I suggest you exclude the scheme.

Please note, we did have an agreed scheme with Highways England’s (now National Highways) Spatial Planning team in the context of the Runnymede Local Plan, but this was when the design for the M25 J10-16 smart motorway was unknown. We are now working with the Smart Motorway project team and as a result the scheme may change we are unlikely to know whether a change will be required and if so, what the new scheme will be for some weeks.

However, this means that both SCC and Highways England will still need to know what the impact is forecast at the junction. Consequently, as Highways England has stated, a detailed model of the junction is likely to be necessary along with a DMRB merge and diverge assessment. By that time, we may know what the scheme will be and so the scheme will be able to be modelled with the change in forecast flows from your strategic work. We might be able to assist with LinSig / microsimulation models, but I would need to confirm this first.”

Elmbridge BC position:

“From the Council’s position we are being told by the Government not to delay the production of Local Plans and be proportionate in our approach to the evidence base. We are currently in the final stages of completing the evidence base and will then be moving forward with the Reg.19 representation period on a draft plan. At this current time we have been advised by SCC and WSP that there is a lack of detail to enable this scheme to be adequately modelled in the final stages of the scenario testing for the TA, and there are no confirmed timescales or clarity as to when more scheme details would be available. We will continue with the production of the Local Plan, however, should more details emerge as we progress the plan we will revisit this and discuss with WSP, SCC and National Highways how to proceed”.

A response from National Highways dated 11 March 2021, stated “the A320 HIF can be considered a committed scheme although the J11 element may not be advanced enough yet. Although for the purposes of your assessment as long as the adopted Runnymede Local Plan growth is assessed as committed, your assessment will likely be robust. But

you may have worst results as the J11 scheme (part of the A320 HIF) mitigates Runnymede LP growth at J11”.

The council's final position (at the time) was shared with National Highways and was as follows:

“The approach to forecasting was discussed and agreed between EBC, National Highways and SCC in October 2019, at the time of testing the High Growth Scenario (that stage preceded the current stage testing stage). The approach assumed that in Scenario 1 (Reference Case) the trip end growth for neighbouring planning authorities, where a Local Plan was adopted, would be based on the Local Plan targets rather than DfT's projections accessible via Temprow. At that time the status of the Local Plans in the adjacent to Elmbridge local authorities was reviewed.

In most cases the Local Plans were not adopted. Guildford and Richmond had their Local Plans adopted and for these the planning projections included within Temprow were superseded with the adopted growth targets. Runnymede did not have its Local Plan adopted at that time.

Therefore Scenario 1 includes Temprow planning projections for Runnymede, which assumes a growth of 6,188 dwellings and 5,866 jobs between 2014 and 2036. This falls slightly short of the level of growth included within the adopted Runnymede Local Plan: 7,920 dwellings and 99,000 sqm (between 2015 and 2030), which translates into circa 8,250 jobs.

Having considered the additional time and cost to update Runnymede LP assumptions within Scenario 1, Elmbridge BC concluded that that would not, at that stage, be proportionate and cost effective in relation to the production of the plan.

Therefore, the latest version of Scenario 1 allows for growth in Runnymede, which is slightly short of the Local Plan projections”.

On 10 March 2021, WSP also emailed National Highways setting out the proposed methodology to undertake an assessment of merges and diverges on the SRN using DMRB calculations (TD22/06). This was initially raised at the meeting on 18 January 2021.

National Highways responded on 8 April 2021 stating that the methodology generally sounds okay but asked for clarification:

- If the merge or diverge with Local Plan growth can be accommodated within the existing configuration then no action is required
- If the merge or diverge with Local Plan growth is below standard the issue becomes how much traffic the Local Plan is adding and what will mitigate this additional traffic. This is the nil-detriment requirement.
- You will need to examine the merges and diverges at M25 Junction 11. The scheme at this junction is for the roundabout and approaches, not the main carriageway merges and diverges.

On 5 May 2021, WSP followed-up previous informal discussions with TfL regarding the Transport Assessment. Previous correspondence from the 2016/17 and 2019 Regulation 18 consultations were re-sent, setting out the key issues of: Crossrail 2, Kingston Bypass,

and bus provision.

In regard to the key issues, WSP set out the current situation / position on each:

- The Crossrail 2 scheme is currently on pause and there has been no further progress in developing the scheme or securing funding. Regardless, the council is keen to continue to work with TfL should they commence further work on the scheme.
- There is reference within the correspondence to the A3/ A243/ Hook Roundabout, which adjoins the TfL Transport for London Road Network (TLRN). The correspondence refers to existing congestion at the junction, and that the Elmbridge Council, Surrey County Council and Kingston Council have been working on options for this junction, and the connections to it. WSP confirmed they would be able to share the modelling outputs from the Local Plan, which illustrated the impacts of growth at the junction. It was highlighted that the council's and WSP's current position on this is that whilst delay may increase in the future, this is generally due to holistic network growth, and is manageable. WSP noted the location of one of the potential site designations (GB25) at Ditton Hill, which is close to the TfL network, and stated more detailed site-specific discussions about the impacts of this site would be undertaken, to ensure any impacts are understood and mitigated should the option be pursued.
- Buses – WSP noted that a number of TfL bus services do enter the borough, and that they will ensure that these are considered.

It was requested that any further updated information on the above key issues be provided and stated that the council would consult with the GLA / TfL over the Summer (2021) as the plan progressed.

On 17 June, WSP and the council met with SCC to discuss the measures required to mitigate the latest modelling work. A similar meeting was held with National Highways and SCC on 6 July 2021. Following the meetings, WSP provided the latest Assessment and detailed modelling work for comment.

Prior to running the modelling for the draft Local Plan, the council wrote to both Surrey County Council and National Highways seeking clarification on the mitigation measures at Junction 11 of the M25 as proposed as part of the Runnymede 2030 Local Plan (adopted July 2020). In a letter dated 18 October 2021, the council requested that in order to ensure its modelling is based on the most up to date information, the latest detailed scheme drawings and a copy of the junction modelling be provided. This information was requested by 25 October 2021 (see Appendix 20).

Receiving no formal response to the above request for information on the Junction 11 of the M25 scheme, the council contacted both the County Council and National Highways and informally discussed the latest position. This was followed by an email from the council to the County Council and National Highways summarising the informal discussions that had taken place and setting out the council's position. The email dated 27 October 2021, stated:

“As discussed, as neither Surrey County Council nor National Highways are able to provide the requested details for the scheme / do not consider these have changed since provided in February 2021, the Council in consultation with WSP, has decided to proceed with the Transport Assessment for our Local Plan without including the detailed mitigation for this junction.

The overall intention / aim of the scheme and the commitment to its delivery is however noted and we will reflect this in our Assessment / Local Plan where appropriate.

Nevertheless, should further details on the proposed Junction improvements materialise, I would be grateful if you could provide these at the earliest opportunity so the Council and WSP can consider how we respond”

A response from National Highways dated 27 October 2021 was received and stated:

“The key thing is that a scheme M25 J11 was identified to facilitate growth set out in the Runnymede Local Plan. In parallel Surrey CC developed the A320 HIF scheme that will also develop proposals for M25 J11 which has been subsequently taken forward as one scheme. Therefore, this is now a Surrey CC scheme and any details/progress should be sought from them”.

Engagement on the draft Local Plan Transport Assessment

Following further work modelling, the council engaged with the County Council, National Highways and TfL on outcomes and proposed mitigation.

A meeting with the County Council took place on 14 December 2021, to provide an update on the Local Plan process and to discuss a Briefing Note (previously circulated) that set out a high-level summary of the latest modelling inputs and outcomes (without mitigation). A similar meeting was held on 17 December 2021, with National Highways. The County Council attended this meeting also. The outcomes of the Briefing Note including those junctions where the potential impact of growth within the borough required further consideration, were noted. It was agreed that further detailed comments would be provided in due course however, that the key focus would be on those junctions that required mitigation and the details of this.

Rather than a meeting with TfL to discuss the latest modelling inputs and outcomes (without mitigation), these were emailed by WSP on 15 December 2021. It was requested that as part of the duty to co-operate, TfL looked at the information and provided a response from a strategic transport perspective.

On 14 January 2022, WSP emailed the County Council, National Highways and TfL informing them that the mitigation modelling was now completed and attached a Briefing Note (dated 12 January 2022) setting out a summary of the proposed mitigation and a spreadsheet summarising the modelling results. A down-load to access all the supporting modelling output files was also provided. It was stated that the council would be in contact to arrange a meeting to discuss the mitigation proposals in more detail.

A meeting with TfL to discuss the mitigation modelling took place on 3 February 2022 and with Surrey County Council and National Highways on 4 February 2022.

There were two key outcomes from the meeting:

- A3/ Hook Road grade-separated junction

This junction falls principally within the jurisdiction of TfL. It is sited close to the section of A3 within the control of National Highways. Both TfL and National Highways expressed an interest in the suggested mitigation measures for the junction.

WSP has proposed signalisation of the junction's circulatory carriageway. However, TfL are opposed to mitigation which provides additional traffic capacity: their position is ensuring that there is no detriment to the passage of buses through the junction.

TfL mentioned that they have previously considered a number of junction improvement schemes to date.

WSP, as requested, has forwarded traffic demand flows for the Hook Road junction to TfL for them to validate these flows against TfL's own Saturn traffic model. If the flow information is agreed, the process of agreeing appropriate mitigation for the junction can begin.

- A3/ Copsem Lane grade-separated junction

WSP has proposed the partial signalisation of the junction's circulatory carriageway to mitigate the impact of growth. However, the County Council expressed doubt as to the effectiveness of this measure. The County Council suggested that slow moving traffic tails back from the Milbourne Lane traffic signals (located approx. 1.5km to the north) into the Copsem Lane junction. This tailing back would remove the benefit gained from partial signalisation.

The County Council stated that the issue needed to be considered further and that ideally, the Copsem Lane and Milbourne Lane junctions would be considered in conjunction using a local traffic model that would allow appropriate mitigation measures to be identified.

In regard to the A3/ Hook Road grade-separated junction, WSP has requested a response from TfL on their validation of the flows against their own Saturn traffic model on 25 February, 24 March and 11 & 27 May 2022. A response is still outstanding. WSP are confident that a positive response will be received on shortly and, the council will provide an update in the Supplementary Statement covering activities from June 2022 onwards.

On 21 February 2022, National Highways provided the following formal comments following the meeting on 4 February 2022 and the Briefing Note (dated 12 January 2022):

- “1. We note that there is an impact at M25 J9 (PM peak only), however it is advised in the accompanying spreadsheet that no mitigation is proposed. We are content that no additional detailed modelling is required to rule out a severe impact at the junction as a result of the forecast growth.
3. In terms of M25 J11, the Notes advises “Improvements are being considered (by others) for M25 Junction 11. It is understood that improvements are at an early stage of design and no details of the proposed junction improvement scheme are available to WSP. It is suggested that the designers of the Junction 11 scheme should be provided with the traffic flow information relating to Scenario 5 and that they should modify their junction designs to suit. Are you proposing to engage with the designers directly? Do you consider any potential improvements are necessary to facilitate the LP growth?
3. Turning to the proposed mitigation measures (Table 1), we are content with the Area of Interest identified through the study work. Going forward, critical to National Highways requirements is ensuring the safe and efficient operation of the SRN. Ensuring the scale, footprint and delivery mechanism, and phasing, of appropriate mitigation on the SRN will be critical. I appreciate at this stage, there is a direction

towards the type of mitigation proposed and we would be keen to continue to work with you and the LHA to develop those proposals to the appropriate level of detail”.

In an email dated 25 February 2022, WSP responded to National Highways noting points 1 and 3 of their email. In regard to point 3 it was stated that proposals to look at this junction in more details would be provided. Regarding point 2, WSP confirmed that the joint position of the council and WSP was that the design should accommodate all anticipated growth, including growth that would arise from the Elmbridge local plan. To that end, WSP would provide the designers of the J11 improvements with traffic flows from local plan modelling. It was stated that the council and WSP would look to National Highways and the County Council to coordinate the junction design process.

In an email dated 25 February 2022, the County Council confirmed they did not have more detailed modelling of the Copsem Lane grade-separated junction. As such, it has been necessary for the council and WSP to prepare their own model of the Copsem Lane junction and surrounding environments which has required surveys of turning movements, queue lengths and journey times in order to ensure the model can be properly validated. The County Council did however comment on the advanced stage of the M25 Junction 11 design and the availability of modelling.

In an email dated 2 March 2022, WSP requested from the County Council the Linsig model stating it would be helpful to all parties if the Linsig model could be used to establish whether the emerging design for J11 can accommodate the predicted Elmbridge flows. Emails to the County Council following up the original request for the Linsig model were sent on 25 March and 11 May 2022.

On 30 May 2022, officers from the County Council and the Borough Council discussed the availability of the Linsig model. It was confirmed by the County Council officer that the mitigation for Elmbridge would require the full signalisation of the roundabout controlled by National Highways and that if more green lights were required for vehicles to exit the junction from the M25 this would hold vehicles on the A317. It was confirmed that as long as emergency vehicles could still get passed stationary vehicles on the A317, then the County Council would not be overly concerned.

On 23 May 2022, WSP emailed the County Council and National Highways the scope for the surveys of the additional modelling work. A response from National Highways was provided on 23 May 2022. This sought clarification on ‘stop lines’ (arrivals and departures) and the type of analysis or modelling that is envisaged. The County Council responded on 27 May 2022, concurring with the comments made by National Highways. Details comments were also received relating to the timings of the surveys and geographical area.

- **Infrastructure Delivery Plan (IDP) 2022**

In support of the draft Local Plan, the council has prepared an updated IDP to reflect the level of development, including locations and timings, as set out in the council’s preferred spatial strategy and the additional infrastructure required to accommodate / mitigate this. The council engaged infrastructure providers in August / September 2021.

In regard to Transport, the IDP includes the mitigation required to support the delivery of the draft Local Plan as set out in the Transport Assessment 2022.

8. Summary of latest position with Surrey County Council, National Highways and TfL

Following the engagement process with NH, SCC and TfL as outlined above, it is understood that all three authorities:

- Agree with the use of the SINTRAM traffic model,
- Agree with the geographical area included within the model,
- Agree with the modelling results for the Scenario 1, Scenario 5 and “With mitigation” scenarios,
- Agree in principle that mitigation should be limited to the five junctions identified and
- Agree that no further mitigation measures are required for the draft Local Plan spatial strategy.

As discussed above, the County Council has suggested that the problems at the A3/ Copsem Lane junction arise from traffic queuing back from nearby junctions located to the north and south. This matter is currently being progressed with Surrey County Council and National Highways.

Discussions with TfL are ongoing with respect to proposals to signalise the Hook Junction. TfL is concerned that signalisation would improve capacity for general traffic using the junction, to the detriment of bus services. The development of mitigation measures which would address this matter is a subject of ongoing discussion with TfL. WSP are confident that a positive response will be received on shortly and, the council will provide an update in the Supplementary Statement covering activities from June 2022 onwards.

Agreement in principle has been reached that the impact on the road networks from the growth set out in the draft Local Plan can be mitigated.

9. Other Engagement Activities

Surrey 2050 Place Ambition

In July 2019, Surrey’s Place Ambition (Our approach to place leadership, infrastructure and good growth) was published (Appendix 16). It is an agreed growth strategy for Surrey which sets out three long term strategic priorities and eight identified Strategic Opportunity Areas, which will be shaped and delivered within the context of the shared growth vision, principles and values.

As part of its evolution, the Place Ambition has been looked at to reflect the current planning context, especially the challenges around economic recovery (post Covid-19 pandemic) and the increasing weight being given nationally to climate change, biodiversity, health and well-being and improving the quality of developments.

In December 2021, on behalf of Surrey Future, Surrey County Council published and sought comments on Surrey’s 2050 Place Ambition - Spatial Framework: A Strategic Vision for Place Leadership, Infrastructure & Good Growth Draft Version 2. Published alongside Draft Version 2 of the Surrey 2050 Place Ambition, is an Implementation Framework which was also the subject of this consultation (see Appendix 17).

There are four strategic priorities with the first being to improve connectivity both within Surrey and between strategically important hubs. Under this priority it is recognised that the availability of public sector funding for infrastructure continues to decline nationally, and therefore it is vital that there are a clear and agreed set of shared strategic infrastructure priorities which offer the best opportunity to improve movement within and

between our existing urban centres, and between Surrey and other key national and international destinations.

It is also recognised that these shared priorities help address changing mobility and the long-term impacts of climate change. The first priority of the Ambition will therefore be to work together with our partners to develop a coherent long-term infrastructure investment strategy which aims to:

- Ensure that investment in strategic infrastructure is focused in areas where it can unlock development opportunities or support better connectivity between Surrey's main economic centres and key hubs, and between Surrey and other key destinations within the wider South East and nationally.
- Ensure a more reciprocal relationship with London on common interests, recognising that Surrey's proximity to the capital will remain one of its greatest economic assets and continue to work with the Mayor of London, Transport for the South East and partners across the Wider South East to address regional challenges and deliver strategic infrastructure priorities.
- Build on existing measures and develop new measures that align with the "avoid, shift, improve" approach of LTP4.
- Improve rail connectivity between Surrey's main towns and other key economic centres by securing investment in the North Downs Line, capacity improvements at Woking and Guildford Stations and Southern Rail access from Heathrow Airport to Surrey and beyond.
- Focus on improving stations within Surrey so they benefit local communities and support sustainable local economic growth. Develop stations by improving access to them by public transport and active modes and enhance overall quality of services, for example through use of digitalised signalling and better timetabling.
- Enhance the quality of bus services through investing in infrastructure to allow faster journeys by bus, improving the coverage of the network, providing more coordinated bus services which integrate with other transport modes and improving service frequencies, reliability, fares and customer experience.
- Support the provision of a high-quality network to increase walking/cycling uptake. The network would serve and link urban and rural built-up areas to public transport connections. Where possible this would involve the development of active travel and green corridors and making improvements to rights of way.
- Promote the operational efficiency (and in some cases safety) of our transport network through securing improvements along our strategic movement corridors and junctions, including the Strategic Route Network, the Major Road Network, and key transport hubs. Develop new and innovative infrastructure funding solutions and ensure that we are in the strongest position to compete for new infrastructure funding and investment opportunities. Maximise the opportunities provided by technological advances in mobility.
- Develop county-wide digital infrastructure through working with commercial and public sector partners to enable access to fibre and gigabit capable services.
- Build on the potential for digital technology to enhance connectivity, helping to reduce congestion on our roads and improve the vitality of our urban areas including those rural communities that face the greatest connectivity challenges. This will increase our ability to address the impacts of climate change and improve the overall health and well-being of our residents.

Strategic Priority 3: Maximising the potential of our Strategic Opportunities Areas (SOA), identifies those areas with the greatest long-term potential for delivering 'good growth' across Surrey by investing in places that offer opportunities to boost productivity by

maximising the value of strategic assets such as universities, transport hubs and strategic employment sites / centres to support our economic strengths and priority industrial sectors.

The Woking Hub incorporates areas of Woking, Guildford and Elmbridge boroughs. It comprises much of the borough of Woking but also the Brooklands employment area (part in Elmbridge Borough) and the strategic new settlement at the former Wisley airfield. In regard to Elmbridge Borough, the Ambition identified the A245 corridor as an important route economically as it provides access from the A3 to the Brooklands Business Park in Elmbridge. This is a sub-regional, strategic employment centre, home to some 200 businesses in a mix of premises ranging from high quality international headquarters to large format warehousing and distribution centres and light industrial buildings on the Brooklands Industrial Estate.

The deliver the priority outputs identified for the SOA, the council is working with the County Council, Guildford & Woking Borough Councils and other delivery partners.

Local Transport Plan 4 (LTP4)

The County Council is currently in the process of working with appointed consultants to prepare in cooperation with local authorities and other relevant stakeholders the next Local Transport Plan for Surrey.

The Local Transport Plan will provide a road map / policy direction for transport planning across Surrey and will look to assist with the implementation of the Surrey 2050 Place Ambition and the concept of 'good growth'. The Plan is looking to provide the first step on the path to zero carbon and look to address inequality in social mobility and pockets of deprivation experienced across Surrey.

In preparing the Plan, the County Council have hosted a series of workshops on the streams / components of the vision – low carbon, economy, health & well-being, quality of life, environment. Officers participated at these workshops.

Public consultation on the draft Transport Plan ran from 5 July to 24 October 2021. The council submitted a formal response.

Given the timings of the development of LTP4, the council has ensured that its draft Local Plan follows the principle of good growth and encompasses the components of the vision for the delivering sustainable development and active travel. However, any detailed policy requirements or potential schemes to be implemented in Elmbridge that emerge from the Plan and the more detailed Local Transport Strategies, will be reflected in future versions of the Elmbridge Local Plan and incorporated into the Community Infrastructure Levy (CIL) Strategic Priority Programme (SPP) List where appropriate.

Local Cycling & Walking Improvement Plan (LCWIP) March 2022

The council has worked with Surrey County Council and their appointed consultant to develop a LCWIP for the borough. Based on latest guidance and best practice, the main outputs for an LCWIP are network plans to identify key walking and cycling corridors, initial high-level concept proposals, and a prioritised programme of infrastructure improvements.

The LCWIP report is the first step in the process for identifying priorities for future active travel investment. Future stages will examine potential schemes in more detail and, if

appropriate, advance them through subsequent design and delivery stages as funding is available. The primary objective for the LCWIP is to increase the number of people walking and cycling in the Borough, particularly for short utilitarian journeys.

Improvements to cycling and walking networks will be incorporated into the Community Infrastructure Levy (CIL) Strategic Priority Programme (SPP) List where appropriate.

M25 / J10 Improvement Scheme, Development Consent Order (DCO)

In December 2014 the Department for Transport (DfT) published the Road Investment Strategy (RIS) for 2015-2020. The RIS sets out the list of schemes that are to be delivered by National Highways over the period covered by the RIS (2015 – 2020).

The RIS identified improvements to M25 J10/A3 Wisley Interchange as one of the key investments in the SRN for the London and South East region. The proposed improvements being as follows: “improvement of the Wisley interchange to allow free-flowing movement in all directions, together with improvements to the neighbouring Painshill interchange on the A3 to improve safety and congestion across the two sites”. Throughout the preparation of the draft Local Plan, the council has been working with National Highways and their appointed consultants, Surrey County Council, Guildford Borough Council and other interested parties to comment on the potential options for the scheme (initial engagement) right through to the examination of the DCO and implementation plans.

A decision on the application for a DCO was taken on 12 May 2022 and has now been issued. The council will continue to work with the above Strategic Partners as the scheme is delivered considering any potential impact this may have on the delivery of allocated development sites and other improvement measures that the council / highways authority may dovetail off the scheme.

Cross Rail 2

As set out in the summary of responses received to the Regulation 18 Consultations, Crossrail 2 would improve capacity and connectivity to stations in Elmbridge (Hampton Court and Thames Ditton) as well as in surrounding areas.

The latest update in regard to the scheme was given in November 2020, when the Government announced that due to current finances and the lack of a viable funding package for the scheme at the moment, it was no longer developing the scheme. The latest position of the Mayor of London is that the proposed route will be safeguarded in case work could begin again in the future.

The council will continue to monitor the progress of the scheme with any potential benefits and opportunities being considered as part of future Local Plans.

Heathrow Southern Access

Heathrow Southern Railway (HSR) is a privately financed proposal for Southern Access to Heathrow Airport (SATH). HSR is all about allowing fast, easy and relaxing access to Heathrow Airport through the construction of up to 8 miles of new railway from the west end of the existing Terminal 5 station, linking with the existing South Western network.

HSR would open up access to and through Heathrow from the south west and south east of England by enabling trains to operate between Heathrow and Waterloo via Clapham

Junction, Putney, Hounslow, Twickenham, Richmond, Staines and other intermediate stations; and between Heathrow, Woking, Guildford, Farnborough and Basingstoke. The new railway will also improve connectivity between Surrey and London for commuters, creating a new route from Basingstoke, Guildford and Woking via Heathrow Airport to Old Oak Common (for HS2 and the Elizabeth Line) and London Paddington.

Delivery of the scheme was first estimated to be 2027/28 however, due to uncertainty surrounding the potential funding of the scheme and as civil aviation recovers from the Covid-19 pandemic, there are delays.

As part of the Heathrow Strategic Planning Group, the council has worked with its partners to set out a Position Paper regarding SATH (see Strategic Matter 14).

The council will continue to monitor the progress of the scheme with any potential benefits and opportunities being considered as part of future Local Plans.

Transport for the South East

Transport for the South East was established in 2017 to determine what transport infrastructure is needed to boost the region's economy. The partnership is made up of 16 local authorities, five local enterprise partnerships plus representatives of district & borough authorities, protected landscapes and national delivery agencies.

The role of Transport for the South East is to add strategic value by making sure that funding and strategy decisions about transport in the South East are informed by local knowledge and priorities. At the heart of this is the transport strategy, which was published in Summer 2020 and sets out the partnership's shared vision for a better connected, more prosperous and more sustainable South East by 2050.

Turning the vision into reality, on-going work is taking place with key partners and stakeholders across the region to determine what the South East's priority transport schemes, initiatives and policies should be. This is being undertaken through a series of area studies (five in total).

Each study will investigate the issues, challenges and opportunities identified in the transport strategy in more detail and, ultimately, identify a shortlist of interventions to make life better for people, for businesses and for the environment. The outcomes of these studies will form the basis of the strategic investment plan – a blueprint for investment which Transport for the South East want to deliver with government and national bodies like Network Rail and Highways England.

Elmbridge is located in two study areas:

1. The inner orbital
2. South West radial

The council has fed into these Studies working in partnership with the County Council, other relevant local authorities and interest parties / stakeholders. Initially this has been through a series of workshops held in early 2021 and 2022 and commenting on draft proposals.

The draft investment plan is due to be published for consultation in summer 2022 with the aim of submitting the final plan to government in early 2023.

Category	Details
<p>Summary of outcomes from strategic working:</p>	<ol style="list-style-type: none"> 1. An understanding of the wider plans and strategies that needed to be taken into consideration when preparing the draft Local Plan. 2. A robust and credible evidence base which sets out the potential impact of growth within the borough on the local and strategic road networks. 3. Agreement in principle that the impact on the road networks from the growth set out in the draft Local Plan can be mitigated. 4. Detailed policies drafted and allocations identified taking into consideration recommendations made by Strategic Partners that seek to ensure development is located in sustainable places and active travel is promoted. 5. Working with Strategic Partners to identify infrastructure needs arising from new development to be placed on the council's Strategic Priority Programme List for CIL funding and to regularly update the Infrastructure Delivery Plan as required.
<p>Links to the draft Local Plan:</p>	<ul style="list-style-type: none"> • The Vision – Elmbridge 2037 • Principle 1 – Tackling Climate Change • Principle 5 – Providing infrastructure and connectivity • Policy SS1 – Responding to climate change • Policy SS2 – Sustainable place making • Policy SS3 – Scale and location of growth • Policy CC4 – Sustainable transport • Policy ENV8 – Air quality • Policy ENV9 – Urban design quality • Policy HOU2 – Optimising sites • Policy INF1 – Infrastructure delivery • Policy INF3 – Health and wellbeing of communities
<p>On-going cooperation:</p>	<ol style="list-style-type: none"> 1. The council will continue to engage with Surrey County Council, National Highways and Transport for London on the details of the mitigation required to support the delivery of the draft Local Plan. 2. Statements of Common Ground (SoCGs) or updated SOCGs will be sought with each HMA Partner and neighbouring authorities to cover all relevant Strategic Matters including Transport. 3. Several of the 'Other Engagement Activities' are on-going, and the council will continue to work with its Strategic Partners on the preparation of wider strategies and plans taking into considering how these may affect the council's continued plan-making process.

Strategic Priority B) Infrastructure for transport; telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)

Strategic Matter 5: Flooding

Category	Details
Strategic Planning Issue:	Ensuring that development is located away from areas at the highest level of flood risk and does not increase the risk of flooding elsewhere
Strategic Partners:	<ul style="list-style-type: none"> • Enterprise M3 LEP • Environment Agency • Epsom and Ewell Borough Council • Greater London Authority / Transport for London • Guildford Borough Council • Highways Agency / Highways England • Historic England • Homes and Communities Agency / Homes England • London Borough of Richmond upon Thames • Mole Valley District Council • Natural England • Reigate & Banstead Borough Council • Royal Borough of Kingston upon Thames • Royal Borough of Windsor & Maidenhead • Runnymede Borough Council • Spelthorne Borough Council • Surrey County Council • Surrey Futures Board • Surrey Heath Borough Council • Tandridge District Council • Thames Water • Waverley Borough Council • Woking Borough Council
Key Evidence Base:	<ul style="list-style-type: none"> • Surrey Strategic Infrastructure Study (2017) • Review of Absolute Constraints (2016, 2019, 2021) • Strategic Flood Risk Assessment (SFRA) (2019) • Strategic Flood Risk Assessment (SFRA) Addendum (2022) • Infrastructure Delivery Plan (2018, 2019, 2022) • SA/SEA

This section is set out as follows:

- 1. Surrey Strategic Infrastructure Study (2017)**
- 2. Local Plan Evidence Base Preparation (2015 – 2016)**
- 3. Elmbridge Local Plan - Local Plan: Strategic Options Consultation (2016/17)**

4. **Local Plan Evidence Base Preparation (2018 - 2019)**
5. **Elmbridge Local Plan - Local Plan: Options Consultation (2019)**
6. **Local Plan Evidence Base Preparation (2019 – 2020)**
7. **Elmbridge Local Plan - Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)**
8. **Local Plan Evidence Base Preparation (2020 – 2022)**
9. **Other Engagement Activities**

Actions:

The above Strategic Partners have been engaged throughout the preparation of the new Elmbridge Local Plan including at the Regulation 18 consultation stages and in the preparation of the council's evidence base. Key activities have been set out below.

In addition, SCC in 2017 published the Surrey Strategic Infrastructure Study as part of initial work undertaken on the Surrey Local Strategic Statement (LSS). The details this Study insofar as Elmbridge Borough have been summarised below for context as, this formed part of the early evidence informing the first Regulation 18 consultation.

1. Surrey Strategic Infrastructure Study (2017)

The council worked in partnership with the SCC and other Surrey boroughs and districts to produce the Surrey Strategic Infrastructure Study 2017.

A wide range of stakeholders were engaged to inform the study including county and district council service providers, transport operators, utility companies, higher education providers, Clinical Commissioning Groups, the Environment Agency, Surrey Nature Partnership and the Coast to Capital and Enterprise M3 LEP.

In regard to the Strategic Matter of Flooding, the Study assessed the demand for, and improvements required to support growth. A programme of projects and investments to reduce flood risk to communities were identified and in part, some have already received monies from the Community Infrastructure Levy (CIL) to support their implementation. However, the scheme identified that will have the biggest benefit to the borough is the River Thames Scheme (further information on this project is set out below).

The Study formed part of the evidence base for the Surrey Local Strategic Statement (LSS) 2016 – 203. However, is now being updated to in support of the Surrey 2050 Place Ambition. The council continues to be actively involved in this work through Surrey Futures.

2. Local Plan Evidence Base Preparation (2015 – 2016)

- **Review of Absolute Constraints (2016)**

In 2016 the council published a document identifying the 'absolute constraints' to development within the borough. In regard to the Strategic Matter of Flooding, land within Flood Zone 3b (1 in 20-year flood outline –undeveloped land) was identified as an absolute constraint.

As part of the preparation of the document, on 16 July 2015, the council consulted on a draft methodology. Responses were received from:

- Environment Agency
- Epsom & Ewell Borough Council
- Greater London Authority
- Mole Valley District Council
- Natural England
- Runnymede Borough Council
- Spelthorne Borough Council
- Surrey County Council

On 14 August 2015, the council was contacted by Historic England stating that they had missed the consultation deadline and asked if comments were still being accepted. The council responded on 17 August 2015, sending a copy of the responses received and how the council intended to address them. It was stated that if their comments had not already been addressed, then these could be provided. The council received no further response.

A summary of the comments received and how the council responded is set out in Appendix 6.

In 2019, the Review was updated to date account of the Strategic Flood Risk Assessment (SFRA, 2019) that provided updated of the flood risk zones across the Borough including the extent of Flood Zone 3b. In 2021, the Review was updated further to take account of the SFRA Addendum (2021) which took account of Climate Change allowances and updated work on the Flood Zone 3b extent (see below for further information).

3. Elmbridge Local Plan: Strategic Options Consultation (2016/17)

The consultation took place between 16 December 2016 and 24 February 2017.

Regarding the Strategic Matter of Flooding, responses were received from the Environment Agency and London Borough of Richmond upon Thames.

The Environment Agency expressed support for the recognition of flood plains as 'absolute constraints' when reviewing areas of land that may be performing weakly against the purposes of the Green Belt.

The Environment Agency also stated they were pleased that flood risk was considered throughout the document and that the council are committed to ensuring that the areas at the highest flood risk are protected from inappropriate development. The response also highlighted the directive of directing development to the lowest appropriate area of flood risk and that all development at risk of flooding must be designed to minimise risk, ensure it is safe and does not increase the risk of flooding elsewhere.

Finally, the Environment Agency stated that if it was deemed that a policy is necessary for addressing the impact of cumulative small-scale development then they would like to work closely with the council in creating it.

The London Borough of Richmond upon Thames identified that through previous duty to co-operate discussions, the importance of the River Thames, its Corridor and its

Tributaries has been identified as a cross-boundary issue.

4. Local Plan Evidence Base Preparation (2018 - 2019)

- **Infrastructure Delivery Plan (IDP) 2018**

The IDP (December 2018) identified the current baseline in relation to existing infrastructure in the borough. It also identified main areas of responsibilities and where possible, details of planned provision and potential provision required as a result of the Local Plan.

The IDP was prepared with the involvement of relevant stakeholders and based on information that the council managed to obtain from a range of sources including meetings with stakeholders, feedback received during previous consultations (pre-2018) and through direct stakeholder consultation between 30 April and 1 June 2018.

The Environment Agency, SCC as the LLFA, and Thames Water were consulted. No responses were received in regard to the Strategic Matter of Flooding.

- **Strategic Flood Risk Assessment (2019)**

The council commissioned consultants (AECOM) to produce the Strategic Flood Risk Assessment (SFRA). Prior to commencing the Assessment, the council approached neighbouring authorities to see if a joint assessment could be undertaken.

Unfortunately, due to the differing stages that each local authority was at with their Local Plan preparation this was not possible. Nevertheless, neighbouring authorities were consulted during the preparation of the Assessment. This included providing data and information on development schemes proposed in their respective areas which may impact on water courses included within the Elmbridge SFRA area. In producing the Assessment, the Environment Agency were engaged throughout the process and the council agreed a cost-recovery framework to ensure they were able to input effectively into the Assessment including providing the required data and information and providing comments on the draft Assessment. The Environment Agency also attended a number of joint meetings with the council and AECOM.

SCC as the LLFA and Thames Water were also involved in the process, and were engaged in the draft methodology and draft report.

5. Elmbridge Local Plan: Options Consultation (2019)

The consultation took place between 19 August and 30 September 2019.

Only the response from the Environment Agency raised issues relating to the Strategic Matter of Flooding.

The response from the Environment Agency stated all of the options should fully consider the content of the SFRA and the NPPF in relation to flood risk, climate change and the sequential test. Comments made in response to the Strategic Options Consultation (2016/17) were repeated in regarding flood risk being recognised as an 'absolute constraint', with the extent of Flood Zone 3b – Functional Floodplain appearing on the associated absolute constraints mapping accompanied by a description of Flood Zone 3b.

The response encouraged the council to undertake a flood risk sequential test and to

allocate sites with the lowest risk of flooding. It was stated that if it was determined that sites within the floodplain have to be allocated, a level 2 strategic flood risk assessment (SFRA) will be required. It was highlighted that consideration must be given to climate change allowances when looking at site viability for allocations.

6. Local Plan Evidence Base Preparation (2019 – 2020)

• Infrastructure Delivery Plan (IDP) 2019

The council updated and published the IDP in August 2019. In updating the IDP, the council asked infrastructure providers to consider the impact of delivering 623 every year during the plan period and sought comments on the document between 14 November and 16 December 2019.

On 16 December 2019, the Environment Agency provided detailed comments relating to the Strategic Matter of Flooding and points for the council to consider. Their response stated that:

“In order to determine the location of development, including roads, you should consider the following in the very early stages:

- We encourage you to undertake a flood risk sequential test and allocate sites with the lowest risk of flooding.
- Areas of Flood Zone 3b – functional floodplain, as defined by your Strategic Flood Risk Assessment (SFRA), should not be considered for development.
- Consideration must be given to climate change allowances. More guidance can be found on the Gov.uk website <https://www.gov.uk/guidance/climate-change>
- All of the options should fully consider the content of the National Planning Policy Framework (NPPF) in relation to flood risk. Any future development should not result in an increase in flood risk elsewhere”.

7. Elmbridge Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

The consultation took place between 27 January and 9 March 2020.

Only the response from the Environment Agency raised issues relating to the Strategic Matter of Flooding. The Environment Agency highlighted that the SFRA should define areas at risk of flooding within the borough and that strategic allocations and policies should be informed by the Assessment. It was highlighted that following the release of the new River Thames (Hurley to Teddington) 2019 model, the SFRA must be updated to reflect any changes in flood risk.

The response stated that the Sequential Test must be applied, considering the current and future impacts of climate change, to guide development to the areas of lowest flood risk in order to avoid flood risk to people and property. It was stated that if it is determined that sites within the floodplain have to be allocated, a level 2 SFRA would be required.

The Environment Agency stated that should development be permitted within flood risk areas, a sequential approach to the layout must be followed. It would need to be clearly demonstrated that occupants would remain safe, whilst ensuring that flood risk is not increased elsewhere, for the lifetime of the development. Where possible development should provide additional flood storage.

Finally, it was stated that providing space for flood water storage should be approached positively. If development incorporates land that is to be used for storing flood water, the land should be recognised as an integral part of the development proposal. For example, it was said, flood storage areas do not have to be for single use, they can be used as public open space or for recreation and be designed to store water only in times of flood.

8. Local Plan Evidence Base Preparation (2020 – 2022)

• Site Assessments / the consideration of development options

In developing the draft Local Plan, SCC as the LLFA and the Environment Agency have both provided detailed comments on potential options for site allocations either during the consultation process or as part of the preparation of the IDP whereby the council engaged Infrastructure Providers on different development scenarios and the implications these may have on infrastructure capacity and the potential mitigation required.

In November 2020 as part of a review of the IDP and the assessment of development options, the Environment Agency provided comments on individual sites. These were incorporated into the Land Availability Assessment (LAA) 2021 where appropriate.

• Strategic Flood Risk Assessment (SFRA) Addendum 2022

In response to the comments made by the Environment Agency during previous engagement activities, the council sought to review the SFRA to ascertain whether an update was required. It was discussed in a series of emails with the Environment Agency in July 2021, that the council would consider the updated information and discuss with the Environment Agency how to move forwards.

Having reviewed the data, the council produced an Addendum to outline the implications of the changes in data and set out why it considered an update was not required.

The Environment Agency were provided with a copy of the Addendum on 8 October 2021 and asked to provide comments by 1 November 2021. The process of engaging the Environment Agency on the Addendum is as outlined below:

- Email notification received from the Environment Agency on the 8 October 2021 to say that the council's contact had left and to resend to a generic email address. The council resent the same day.
- Emails and telephone calls made to the Environment Agency to ensure that the information had been received on 15 October and 3 November 2021.
- Email sent to the Environment Agency dated 16 November 2021. A response was requested by 30 November 2021. The end to the email stated "On the basis of no comments being received by 30 November, we will consider that the EA are in acceptance of our SFRA Addendum. This will then be recorded in our duty to co-operate Compliance Statement and we will form part of Statement of Common Ground (SoCG) with you".
- No response was received from the Environment Agency by the extended deadline of 30 November 2021.

- The Environment Agency contacted the council on 21 December 2021 asking that the information be resent. This was actioned the same day and a deadline for comments given of 4 January 2022.
- No response was received from the Environment Agency by the extended deadline of 4 January 2022.
- The council chased a response from the Environment Agency on 11 January 2022.
- The Environment Agency responded 12 January 2022 stating:

“Thank you for consulting us on the SFRA addendum dated July 2021. It is explained that as part of the consideration of sites for allocation, you have identified undeveloped land in Flood Zone 3b as an ‘absolute constraint’ to development. All sites will be reviewed following this update in the data set in addition to the publication of updated Flood Mapping. Providing the sequential testing and potential level 2 SFRA’s use the latest flood data to inform decision making, we have no preference with respect to whether changes are included in the main document or as an addendum to the main report. The addendum includes updated mapping in the appendix, which we welcome. It would be helpful to include details of the updated data sets within the addendum for clarity.

We recommend re-wording para. 2.13. This reference changing weather patterns over the last couple of years without making reference to evidence. We would recommend this is updated to make reference to climate change if the intention is to discuss changing weather patterns. As it is currently written it could be considered anecdotal only describing weather over that period. The same paragraph states ‘Flood Zone 3b is only modelled on the presence of a flood event.’ This is not an accurate definition as Flood Zone 3b is based on a defined return period, which we understand from the SFRA Level 1 2019 document as 5% annual flood (1:20). You could say something like in this borough (and could be more specific and list catchments) during this return period we experience flooding. You could make reference the section in the main report where Flood Zone 3b is defined, and the appendix in this addendum where it shows the new flood extent.

Where you include internal flooding records in the appendix of this addendum, we would recommend that you consider firstly, whether it is necessary to include this. Secondly, where you are including this that it meets General Data Protection Regulation (GDPR) requirements so recommend you discuss with your data team”.

- The council acknowledged the response from the Environment Agency that same day (12 January 2022) and sought clarification on the point regarding the need to review all sites. It was stated that at this stage of preparing the draft Local Plan, all sites being considered are in the urban areas and not in the functional floodplain which would otherwise require necessary sequential testing. It was stated that a previous Environment Agency contact had reviewed all the sites for the council that were now being considered for allocation. A meeting to discuss was requested.
- The council sent emails date 18 and 24 January following-up from the email sent 12 January 2022 requesting a meeting to discuss the points raised.
- The Environment Agency sent a response dated 24 January 2022, stating advisors would liaise and respond shortly.

- The council chased for a response on 1 February 2022. An advisor responded the same day providing contact details for an alternative Environment Agency Advisor.
- The council email the alternative contact on 3 February 2022. Between the 3 and 4 February 2022, the council spoke to the Environment Agency contact. Following up in an email dated 4 February 2022, the council requested written confirmation that the council is not required to undertake a Level 2 SFRA due to the housing allocations under consideration being located away from the functional floodplain.
- The council chased the Environment Agency for a response on 10 February 2022.
- The Environment Agency responded on 15 February 2022 stating a response would be provided 'next week'.
- The council chased the Environment Agency for a response on 23rd February and 15 March 2022. In the email dated 15 March, it was stated that a response from the Environment Agency was now critical to our Local Plan process. A response was requested by 24 March 2022.
- No response was received from the Environment Agency by 24 March 2022. In response to the comments received from the Environment Agency dated 12 January 2022, the council has made the suggested changes to the Addendum where appropriate. In response to the telephone conversation with the Environment Agency on 3 / 4 February 2022, the council has not undertaken a Stage 2 SFRA.

- **Infrastructure Delivery Plan (IDP) 2022**

In support of the draft Local Plan, the council has prepared an updated IDP to reflect the level of development, including locations and timings, as set out in the council's preferred spatial strategy and the additional infrastructure required to accommodate / mitigate this. The council engaged infrastructure providers in August / September 2021. No specific mitigation was identified as being required as part of the draft Local Plan.

9. Other Engagement Activities

The River Thames Scheme

As set out in Section 5 of this Statement, the River Thames Scheme is promoted by the EA and seeks to reduce flood risk to people living and working near the Thames, enhance the resilience of nationally important infrastructure, contribute to a vibrant local economy and maximise the social and environmental value of the river.

The scheme involves the building of a new flood channel alongside the River Thames to reduce flood risk to 15,000 properties and 2,400 businesses in communities along the river including Weybridge, Molesey, and Thames Ditton. The channel will be built in 3 sections including the widening of the Desborough Cut (Elmbridge Borough) and increasing the capacity of the weir at Molesey (amongst others) by installing additional weir gates. Other benefits of the scheme include the increased resilience of the road, rail, power and water networks as well as the creation of 106 hectares of new public open space and 23 km of new pathways. Biodiversity for wildlife will also improve through the creation of 250 hectares of new habitat.

In response to flooding, flood risk and the RTS a number of groups have been set up. The

main groups are the Lower Thames Planning Officers Group, the Programme Board and a Consents & Authorisations Project Board. These groups comprise officers from the local authorities of Elmbridge, Kingston, Richmond, Runnymede, Spelthorne, Windsor & Maidenhead as well as Surrey County Council. In addition to the Environment Agency, the scheme is also being delivered in partnership with the Thames Valley Berkshire and Enterprise M3 LEPs, Thames Water, Thames Regional Flood and Coastal Committee (RFCC) and the Department for Environment Food and Rural Affairs (Defra).

The Programme Board has recently considered the preferred mechanism to gain planning consent for all aspects of the scheme and how local authorities across the Lower Thames can consistently reflect the RTS in their Local Plans. A Service Level Agreement (SLA) has been agreed detailing joint working.

Through the preparation of the draft Local Plan the council has ensured the safeguarding of Desborough Island and reflected where relevant the ambitions of the Scheme within its emerging policies.

Category	Details
Summary outcomes from strategic working:	<ol style="list-style-type: none"> 1. An understanding of the wider plans and strategies that needed to be taken into consideration when preparing the draft Local Plan. 2. A robust and credible evidence base which sets out the areas least / most likely to flood in the borough which has informed the selection of sites for allocation. 3. Detailed policies drafted taking into consideration recommendations made by Strategic Partners that seek to ensure that the overall and local risk of flooding is reduced including ensuring development is located, designed and laid out to ensure that it is safe; the risk from flooding is minimised whilst not increasing the risk of flood elsewhere; and that residual risks are safely managed. 4. Land at Desborough Island is safeguarded in support of the implementation of the River Thames Scheme. 5. Mechanisms in place to assist in securing funding for improvements through the Community Infrastructure Levy (CIL) for local alleviation projects / improvements if / when required.
Links to the draft Local Plan:	<ul style="list-style-type: none"> • The Vision – Elmbridge 2037 • Principle 1 – Tackling Climate Change • Principle 2 – Protecting and enhancing the quality of the environment • Principle 5 – Providing infrastructure and connectivity • Policy SS1 – Responding to the climate emergency • Policy SS2 – Sustainable place-making • Policy SS3 – Scale and Location of growth • Policy CC5 – Managing flood risk • Policy ENV1 – Green and blue infrastructure

	<ul style="list-style-type: none"> • Policy INF1 – Infrastructure delivery • Policy INF6 – Rivers
<p>On-going cooperation:</p>	<ol style="list-style-type: none"> 1. Working with its Strategic Partners, the council will continue to support the implementation of the River Thames Scheme. 2. The council is working with the County Council and other Surrey boroughs and districts and identified Stakeholders to update the Surrey Infrastructure Study in support of the Surrey 2050 Place Ambition. 3. Working with Strategic Partners to identify infrastructure needs arising from new development to be placed on the council's Strategic Priority Programme List for CIL funding and to regularly update the Infrastructure Delivery Plan as required. 4. Statements of Common Ground (SoCGs) or updated SOCGs will be sought with each HMA Partner, neighbouring authorities and other Strategic Partners to cover all relevant Strategic Matters including Flooding. 5. The council will continue to work in partnership with the EA and the County Council as the Lead Local Flood Authority (LLFA) to update the Flood Risk Supplementary Planning Document (SPD) to provide further guidance on the application of the draft Local Plan policy. 6. In determining planning applications, the council will continue to consult its Strategic Partners and implement the Standing Advice and respond appropriately to the detailed comments received. To assist in this area, the council will continue to appoint consultants to provide specialist advice to the council on large-scale, more complex planning applications. 7. Working with the EA and Surrey County Council as the LLFA, the council is exploring the use of Article 4 directions to remove some permitted development rights from existing developments located in Flood Zone 3b. This work is to ensure that any proposed development and its likely impact on flooding is appropriately considered through the planning process.

Strategic Priority B) Infrastructure for transport; telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)

Strategic Matter 6: Minerals, Waste & Other Utilities

Category	Details
Strategic Planning Issue:	Understand the capacity of our existing infrastructure network and to identify whether improvements are required to support our growth strategy or, if our growth strategy and ambitions including, where new development is located, are limited by the infrastructure network (or any existing waste / minerals designation) and / or other planned development in neighbouring areas.
Strategic Partners:	<ul style="list-style-type: none"> • Affinity Water Services • British Telecommunications PLC / Openreach • Environment Agency • London Borough of Richmond upon Thames • National Grid • Royal Borough of Kingston upon Thames • Southern Gas Network (SGN) • SSE • Surrey County Council (SCC) • Sutton & East Surrey (SES) Water • Thames Water Utilities Ltd • UK Power Networks
Key Evidence Base:	<ul style="list-style-type: none"> • Surrey Strategic Infrastructure Study (2017) • Surrey Waste Local Plan 2019 – 2023 • Surrey Minerals Plan Core Strategy Development Plan Document (DPD) (2011) • Water Cycle Study: Phase 1 Scoping (2018) • Water Cycle Study: Phase 2 Outline Report (2019) • Infrastructure Delivery Plan (2018, 2019, 2022) • SA/SEA

This section is set out as follows:

- 1. Surrey Strategic Infrastructure Study (2017)**
- 2. Elmbridge Local Plan - Local Plan: Strategic Options Consultation (2016/17)**
- 3. Local Plan Evidence Base Preparation (2016/17 – 2019)**
- 4. Elmbridge Local Plan - Local Plan: Options Consultation (2019)**

5. Elmbridge Local Plan - Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

6. Local Plan Evidence Base Preparation (2020 – 2022)

7. Other Engagement Activities

Actions:

The above Strategic Partners have been engaged throughout the preparation of the new Elmbridge Local Plan including at the Regulation 18 consultation stages and in the preparation of the council's evidence base. Key activities have been set out below.

In addition, SCC in 2017 published the Surrey Strategic Infrastructure Study as part of initial work undertaken on the Surrey Local Strategic Statement (LSS). The details of this Study insofar as Elmbridge Borough have been summarised below for context as, this formed part of the early evidence informing the first Regulation 18 consultation.

1. Surrey Strategic Infrastructure Study (2017)

The council worked in partnership with the SCC and other Surrey boroughs and districts to produce the Surrey Strategic Infrastructure Study 2017.

A wide range of stakeholders were engaged to inform the study including county and district council service providers, transport operators, utility companies, higher education providers, Clinical Commissioning Groups, the Environment Agency, Surrey Nature Partnership and the Coast to Capital and Enterprise M3 Local Economic Partnerships.

In regard to the Strategic Matter of utilities, the Study assessed the demand for, and improvements required to support growth in electricity; gas; broadband; water including wastewater treatment works; and waste.

In regard to Elmbridge Borough and this Strategic Matter, the Study also identified the Weylands Treatment Works in Hersham as a potential allocation for the expansion of waste processing.

2. Elmbridge Local Plan: Strategic Options Consultation (2016/17)

Only Thames Water responded to the Strategic Options Consultation raising points relating to minerals, waste and other utilities. However, they responded in their capacity as a landowner; identifying several sites within their property portfolio that could be developed for residential use.

3. Local Plan Evidence Base Preparation (2016/17 – 2019)

To inform its draft Local Plan policies including the consideration of the spatial strategy for the borough and the allocation of sites, the council has undertaken a series of activities including preparing a several evidence base documents.

Relating to minerals, waste and utilities this included:

- **Infrastructure Delivery Plan (IDP) 2018**

The IDP (December 2018) identified the current baseline in relation to existing infrastructure in the borough. It also identified main areas of responsibilities and where possible, details of planned provision and potential provision required as a result of the Local Plan.

The IDP was prepared with the involvement of relevant stakeholders and based on information that the council managed to obtain from a range of sources including meetings with stakeholders, feedback received during previous consultations (pre-2018) and through direct stakeholder consultation between 30 April and 1 June 2018.

In regard to electricity supply, UK Power Networks and SSE confirmed that there were no 'constraints areas' for accepting new generation or load, with the electricity supply demand technically available from the grid supply capacity. Further consideration would however be given to the potential impact of growth within Elmbridge Borough once the exact location and number of new developments was known.

In regard to gas supply, Southern Gas Networks (SGN) confirmed that network reinforcement is determined on an application by application basis when new loads connect to the network, rather than planned for in advance. Therefore, necessary capacity will be developed on a reactive basis by the SGN.

Telecoms providers confirmed that they will deploy FTTP (Fibre To The Premise), free of charge, into all new housing developments of 30 or more homes, this new policy took effect for all new sites registered from November 2016. Meanwhile any developments with two or more homes would have access to the existing or planned fibre infrastructure.

In regard to water supply, the IDP noted that the council is producing a Water Cycle Study (WCS) (see below) and would work with key stakeholders including the borough's water suppliers (Sutton and East Surrey Water, Thames Water and Affinity Water) and the Environment Agency to produce.

Sewerage in the borough is provided and managed by Thames Water. Thames Water indicated that whilst there are no constraints on the capacity of the Esher works (which serves the majority of the borough), requirements to the Hogsmill works are required to support both existing and future growth and that this would be further clarified in the WCS.

- **Water Cycle Study: Phase 1 Scoping & Water Cycle Study: Phase 2 Outline Report (2019)**

The overall objective of the Elmbridge WCS was to identify any constraints on housing and employment growth planned for the borough that may be imposed by the water cycle and how these can be resolved i.e. by ensuring that appropriate water infrastructure is provided to support the proposed development. Furthermore, the Study sought to provide a strategic approach to the management and use of water which ensures that the sustainability of the water environment in the borough is not compromised.

The study has been undertaken following engagement with the several Strategic Partners, via discussions and/or using data provided by:

- Affinity Water Services;
- Environment Agency;
- Surrey County Council
- Sutton & East Surrey (SES) Water; and
- Thames Water Utilities Ltd.

In completing the Studies, the council alongside its appointed consultants formed a Steering Group alongside the Environment Agency (established 14 November 2018).

The WCS provided a site-specific assessment of the potential constraints on each of the proposed major development sites in the two housing scenarios (Scenario 1 – circ. 7,000 dwellings, Scenario 2 – circ. 20,000 dwellings) as well as an allowance for circ. 1,600 jobs over the plan period. These comments have been considered through the assessment of sites for allocation and followed up with more detailed comments and assessment by Strategic Partners as part of the preparation of the IDP (2019 and 2022).

- **Infrastructure Delivery Plan (IDP) 2019**

The council updated and published the IDP in August 2019. In updating the IDP, the council asked infrastructure providers to consider the impact of delivering 623 every year during the plan period and sought comments on the document between 14 November and 16 December 2019.

The responses received from Strategic Partners in regard to electricity, gas, telecoms, water supply and sewage were the same as those recorded in the 2018 IDP as set out above.

4. Elmbridge Local Plan: Options Consultation (2019)

The consultation took place between 19 August and 30 September 2019.

In response to the Options Consultation in 2019, several comments were made from Strategic Partners on issues relating to minerals, waste and utilities.

In their response, British Telecommunications PLC listed a number of their property assets that were still in operation and were unlikely to be available for development until between 2025/27 and 2035/37 at the earliest.

SCC highlighted that Option 3 included the potential release of the Former Weylands Sewage Treatment Works site from the Green Belt and for the site to be allocated for housing accompanied by the preparation of a masterplan. SCC's responses stated that the release from the Green Belt was supported however, this would be on the basis to facilitate waste development as the site was safeguarded and identified in the emerging Waste Plan as an allocated site.

The County Council were extremely concerned that the site could be lost for waste facilities and welcomed further discussions on the issues as the Local Plan progressed to achieve an appropriate long-term development solution which safeguards opportunities for the development of additional waste management capacity together with environmental improvements.

The County Council also raised that the Norwood Farm site, which has been identified in the Options Consultation as 'potential development to be master planned' under Option 3, is located within a Minerals Safeguarding Area (MSA) for concreting aggregate. SCC stated that if this option is pursued further, they would wish to be consulted at the earliest opportunity to ensure that the intensification of residential development on this land considers the requirement not to sterilize the underlying mineral resource.

Thames Water submitted sites for potential development as a landowner.

5. Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

In response to the Vision & Development Management Policies Consultation in 2020, comments were received from Thames Water and UK Power Networks insofar as the strategic matter of minerals, waste and utilities.

Thames Water states that the development management policies should ensure that the matters raised in response to previous consultations are addressed and that developers are encouraged to engage in pre-application discussions with Thames Water ahead of the submission of their applications.

UK Power Networks stated that they do not anticipate any impact on their assets.

6. Local Plan Evidence Base Preparation (2020 – 2022)

Building on its earlier evidence base preparation, the council undertook the following activities in support of the preparation of the draft Local Plan.

- **Infrastructure Delivery Plan (IDP) 2022**

In support of the draft Local Plan, the council has prepared an updated IDP to reflect the level of development, including locations and timings, as set out in the council's preferred spatial strategy and the additional infrastructure required to accommodate / mitigate this. The council engaged infrastructure providers in August / September 2021.

UK Power Networks responded stating that the electricity supply demand needed is technically available from the grid supply capacity, with no planned upgrades to the grid as a result of proposed development required.

SGN confirmed that based on the Network Analysis Model of the sites, at this current time, no development triggers the requirement to reinforce the Intermediate or Medium Pressure gas infrastructure. It was stated that analysing the impact on the Low-Pressure network was far more difficult than on the higher-pressure tiers, due to multiple connection options for the development and their varying impact to the gas infrastructure and, that whilst it did look likely that some sites will trigger the requirement to reinforce the Low-Pressure gas infrastructure, the process is reactive and the impact can only be determined once the developers make initial site connection enquiry.

The responses received from Strategic Partners in regard telecoms were the same as those recorded in the 2018 & 2019 IDPs as set out above.

In the comments received from Affinity Water there was no one site identified as a

concern, only a cumulative increase in demand from the proposed development, and it was highlighted that the pressures at some of the critical points in the network due to the new developments are such that reinforcements in the network in the Elmbridge area will be required (normally meaning new local pipelines). However, it was stated that there was sufficient water supply in the region to meet additional demand requirements.

The assessment of the sites by Thames Water has identified that on all but one of the sites (River Mole Business Park, Esher) there are currently no infrastructure concerns envisaged regarding water and wastewater networks in relation to the development/s, however it is recommended that developers liaise with Thames Water Development Planning team at the earliest opportunity to advise of the developments phasing.

It was recommended for all sites, but especially for the site indicated, that council liaise with Thames Water regarding the certainty of the sites being allocated and timelines for delivery as the draft Local Plan moves through the process, with a final update coming once the Local Plan has been adopted.

7. Other Engagement Activities

Waste Matters

The Surrey Waste Plan 2019 – 2033, was adopted by Surrey County Council on 8 December 2020. The borough council was actively involved in the preparation of the Plan, attending several officer meetings to discuss potential allocation sites within the borough and how these had been assessed, as well as responding to the Regulation 18 Consultation (November 2017) and the Regulation 19 Representation Period (January 2019). In addition, the officers and Councillors attended the Examination in Public presenting evidence on the potential allocation of sites (September 2019).

Policy 10 – Areas suitable for development of waste management facilities, identifies 'Industrial Land Area of Search (ILAS)' where waste facilities could be delivered alongside employment generating uses. In Elmbridge borough this includes opportunities at:

- Molesey Industrial Estate, West Molesey – suitable for a range of uses including
- Hersham North and Lyon Road / North Weylands, Walton on Thames; and
- Brooklands Industrial Park, Wintersells Road Industrial Park and Byfleet Industrial Estate.

All three areas were identified as potentially being suitable for a range of uses including a small-scale (<50,000 tpa) thermal treatment facility.

In addition, under Policy 11 – Strategic Waste Site Allocations, the Former Weylands Sewage Treatment Works, Walton on Thames, is allocated as suitable for a range of potential waste management facilities including a small-scale thermal treatment facility.

In regard to Strategic Waste Sites, the Plan states that the County Council, having demonstrate exceptional circumstances to the allocation of such sites in the Green Belt, will encourage relevant LPAs to consider making appropriate alterations to the Green

Belt's boundaries as their local plans are reviewed.

Officers from the county and borough council met on 20 July 2020 to discuss the approach to Weylands and the progress being made on the Local Plan including, the option to remove the site from the Green Belt. It was noted that this request would need to be considered in light of the borough council's emerging evidence base including the Green Belt Boundary Review and that a decision would be presented in the draft Local Plan (Regulation 19).

Minerals & Aggregates

The Surrey Minerals Plan Core Strategy Development Plan Document (DPD) forms part of the Surrey Minerals Plan and provides strategic policies and site-specific proposals for the extraction of silica sand and clay for the period to 2026. The Core Strategy is supplemented by two further DPDs, the Surrey Minerals Plan Primary Aggregates DPD and the Aggregates Recycling Joint DPD. These documents identify the preferred areas and sites for primary aggregate extraction and aggregates recycling. Policy MC6 & MC7 of the Core Strategy safeguard several sites across the borough for potential mineral extraction.

Following the Standing Advice Note – Minerals Safeguarding published by the County Council, the council has consulted the County Council when assessment potential development options with the aim of ensuring that sites (allocations) avoid the Mineral Safeguarding Areas (MSAs) as far as possible or, that if an allocation is proposed, the MSA is highlighted and the need for mitigation measures to ensure the sterilisation of the resource is avoided is included.

This was discussed in detail at a meeting between borough and County officers on 6 May 2021. Formal written advice followed on 21 May 2021 and was incorporated into the council's assessment of potential development options.

Surrey Minerals & Waste Local Plan

The County Council has started the preparation of its joint Minerals and Waste Local Plan (MWLP). The MWLP will replace the Surrey Minerals Plan 2011 (and associated development plan documents) and the Surrey Waste Local Plan 2019, and be used to guide decisions about future minerals and waste management planning applications. It will also be a material consideration for Surrey's district and borough councils in preparing their local development plans and making their planning decisions.

As a first formal stage, SCC published an Issues and Options document for consultation between November 2021 and March 2022. The council submitted a response. The principal point being the request that the waste allocation at the Former Weylands Sewage Treatment Works, Walton on Thames being revisited.

SCC are seeking to adopt the new MWLP early 2024.

Category	Details
<p>Summary of outcomes from strategic working:</p>	<ol style="list-style-type: none"> 1. An understanding of the wider plans and strategies that needed to be taken into consideration when preparing the draft Local Plan. 2. A robust and credible evidence base which sets out the requirements for utilities in regard to our growth strategy. 3. Determination of areas / sites within the borough that may cause capacity issues with the information being utilised to inform site assessments. 4. Detailed policies drafted taking into consideration recommendations made by Strategic Partners e.g. 'optional requirement plus retrofit scenario' for water efficiency and in regard to specific site allocations. 5. Working with Strategic Partners to identify infrastructure needs arising from new development to be placed on the council's Strategic Priority Programme List for CIL funding and to regularly update the Infrastructure Delivery Plan as required.
<p>Links to the draft Local Plan:</p>	<ul style="list-style-type: none"> • The Vision – Elmbridge 2037 • Principle 1 – Tackling Climate Change • Principle 2 – Protecting and enhancing the quality of the environment • Principle 5 – Providing infrastructure and connectivity • Policy SS1 – Responding to the climate emergency • Policy SS2 – Sustainable place-making • Policy SS3 – Scale and location of growth • Policy CC2 – Minimising waste and promoting a circular economy • Policy CC3 – Sustainable design standards • Policy ENV7 – Environmental quality • Policy ENV9 – Urban design quality • Policy INF1 – Infrastructure delivery • Policy INF5 – Communications
<p>On-going cooperation:</p>	<ol style="list-style-type: none"> 1. The council is working with the County Council and other Surrey boroughs and districts and identified Stakeholders to update the Surrey Infrastructure Study in support of the Surrey 2050 Place Ambition. 2. The council will work with Strategic Partners to identify infrastructure needs arising from new development to be placed on the council's Strategic Priority Programme List for CIL funding and to regularly update the Infrastructure Delivery Plan as required. 3. The council will also work with the County Council to consider any future application(s) relating to the Strategic Waste Allocation Sites or ILAS located within Elmbridge Borough.

	<p>4. Statements of Common Ground (SoCGs) or updated SOCGs will be sought with each HMA Partner, neighbouring authorities and other Strategic Partners to cover all relevant Strategic Matters including minerals, waste and other utilities.</p>
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Strategic Priority C) Community facilities (such as health, education and cultural infrastructure)

Strategic Matter 7: Health

Category	Details
Strategic Planning Issue:	Understand the capacity of our existing health facilities and to identify whether improvements are required to support our growth strategy individually or in combination of that of our neighbouring authorities.
Strategic Partners:	<ul style="list-style-type: none"> • London Borough of Richmond upon Thames • Royal Borough of Kingston upon Thames • Surrey Heartlands Health and Care Partnership Integrated Care System (ICS) • Surrey County Council (SCC)
Key Evidence Base:	<ul style="list-style-type: none"> • Surrey Infrastructure Study (2017) • Surrey Health & Well-Being Strategy (2019) • Infrastructure Delivery Plan (2018, 2019, 2022) • SA/SEA

This section is set out as follows:

1. **Surrey Strategic Infrastructure Study (2017)**
2. **Elmbridge Local Plan - Local Plan: Strategic Options Consultation (2016/17)**
3. **Local Plan Evidence Base Preparation (2018 – 2019)**
4. **Elmbridge Local Plan - Local Plan: Options Consultation (2019)**
5. **Local Plan Evidence Base Preparation (2019 – 2020)**
6. **Elmbridge Local Plan - Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)**
7. **Local Plan Evidence Base Preparation (2020 – 2022)**
8. **Other Engagement Activities**

Actions:

The above Strategic Partners have been engaged throughout the preparation of the new Elmbridge Local Plan including at the Regulation 18 consultation stages and in the preparation of the council's evidence base. Key activities have been set out below.

In addition, SCC in 2017 published the Surrey Strategic Infrastructure Study as part of initial work undertaken on the Surrey Local Strategic Statement (LSS). The details of the Study insofar as Elmbridge Borough have been summarised below for context as, this formed part of the early evidence informing the first Regulation 18 consultation.

1. Surrey Strategic Infrastructure Study (2017)

The council has worked in partnership with the County Council and other Surrey boroughs and districts to produce the Surrey Strategic Infrastructure Study 2017.

Each of the boroughs and districts has an existing or emerging local plan that sets out the planned development across its area and the infrastructure needed to support it in the short to medium term. This Study brings these plans together to provide a 'snap-shot' reflecting the position as at June 2017 and presents an overview of growth and infrastructure at the strategic level across Surrey and to highlight to government, infrastructure providers, developers, local communities and businesses the scale of investment required.

A wide range of stakeholders were engaged to inform the study including county and district council service providers, transport operators, utility companies, higher education providers, Clinical Commissioning Groups, the Environment Agency, Surrey Nature Partnership and the Coast to Capital and Enterprise M3 Local Economic Partnerships.

In regard to the Strategic Matter of health, the Study identified the need for additional floorspace for primary care and dentists across Surrey up to 2031 and for additional acute hospital bed space and mental health space.

The Study formed part of the evidence base for the Surrey Local Strategic Statement (LSS) 2016–2031. However, it is now being updated to in support of the Surrey 2050 Place Ambition. The council continues to be actively involved in this work through Surrey Futures.

2. Elmbridge Local Plan: Strategic Options Consultation (2016/17)

The consultation took place between 16 December 2016 and 24 February 2017.

Regarding the Strategic Matter of health, responses were received from the following Strategic Partners:

- NHS Property Services – advised that when planning for new settlements, the council should ensure that they work with NHS commissioners and providers to ensure that adequate healthcare infrastructure is provided to support new residential development. It was stated that healthcare facilities are essential infrastructure and where new facilities are required; they should be delivered alongside additional housing units to mitigate the impact of population growth on existing infrastructure. The response continued that the council should therefore work with NHS commissioners and providers to consider the quantum and location of healthcare facilities that will be required to ensure that new settlements are sustainable
- Surrey County Council – stated that they would not expect the document to address in detail the challenges relating to health and social care in detail, but from the County Council's perspective these issues are of strategic importance. It was stated the County Council anticipates that there will be full appraisal of future sites to consider the impacts on all groups in the community relating to health and social care.

3. Local Plan Evidence Base Preparation (2018 - 2019)

- **Infrastructure Delivery Plan (IDP) 2018**

The IDP (December 2018) identified the current baseline in relation to existing infrastructure in the borough. It also identified main areas of responsibilities and where possible, details of planned provision and potential provision required as a result of the Local Plan.

The IDP was prepared with the involvement of relevant stakeholders and based on information that the council managed to obtain from a range of sources including meetings with stakeholders, feedback received during previous consultations (pre-2018) and through direct stakeholder consultation between 30 April and 1 June 2018.

At the time of the consultation, the key Strategic Partners were the Surrey Downs Clinical Commissioning Group (CCG) and the North Surrey CCG. In a response from joint director, it was stated that based on the 612 dwellings per annum figure provided, the CCG project this to equate to 13.2 new full-time equivalent GPs required by 2036.

The CCGs requested future funding through the Community Infrastructure Levy or Section 106 agreements when future facilities can be developed. The CCGs also requested that the council assist in allowing future developments to be built in any future identified locations and allow the expansion of existing facilities wherever possible.

It was agreed that the council will continue to engage with the CCGs and reconsult once the exact location and number of new developments was known.

4. Elmbridge Local Plan: Options Consultation (2019)

The consultation took place between 19 August and 30 September 2019.

Regarding the Strategic Matter of health, the following comments were received:

- NHS Property Services – repeated the comments made in response to the Strategic Options Consultation and took the opportunity to provide site specific comments on some of their assets including opportunities for redevelopment for alternative uses due to ‘surplus’ capacity. It was stated that when considering the appropriate option for housing delivery within the new Local Plan, the authority should ensure that priority is given to making the optimum use of existing previously developed sites, including supporting higher densities in appropriate locations.
- Surrey County Council – stated that once the sites to be taken forward are identified, modelling and analysis work can be undertaken to review the implications of proposed development on the provision of county council infrastructure and measures that may be required to mitigate any specific impacts. The County Council welcomed the reference in the consultation document to the use of developer contributions to ensure the timely delivery of the infrastructure to support the planned growth. In regard to public health and option 1, it was stated that if pursued and open spaces such as allotments and playing fields were relocated for development, then the council / Local Plan should ensure that local communities that lose existing open space can easily access alternative open spaces within reasonable proximity to their own settlements.

5. Local Plan Evidence Base Preparation (2019 – 2020)

- **Infrastructure Delivery Plan (IDP) 2019**

The council updated and published the IDP in August 2019. In updating the IDP, the council asked infrastructure providers to consider the impact of delivering 623 every year during the plan period and sought comments on the document between 14 November and 16 December 2019.

The response received from the CCGs repeated the comments made and incorporated into the 2018 IDP.

6. Elmbridge Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

The consultation took place between 27 January and 9 March 2020.

Surrey County Council's response suggested that consideration be given to the healthy planning principles set out in the recent guidance: Creating Healthier Built Environments - Guidance for health and local planning in Surrey (Jan 2020).

7. Local Plan Evidence Base Preparation (2020 – 2022)

Building on its earlier evidence base preparation, the council undertook the following activities in support of the preparation of the draft Local Plan.

- **Infrastructure Delivery Plan (IDP) 2022**

In support of the draft Local Plan, the council has prepared an updated IDP to reflect the level of development, including locations and timings, as set out in the council's preferred spatial strategy and the additional infrastructure required to accommodate / mitigate this. The council engaged infrastructure providers in August / September 2021.

Regarding Primary Health Care, the Surrey Heartlands Health & Care Partnership Integrated Care System (ICS) responded identifying that a whole health planning model had been developed and used to assess the impact of the proposed local plan development on the primary care health infrastructure (further details are set out below under 'Other Engagement Activities'). Information relating to the likely distribution of housing growth across the four Primary Care Networks (PCNs) was provided including the additional clinical rooms required and anticipated cost based on the site locations provided and population projections.

It was stated that proportionate funding toward the additional capacity would need to be secured through development from either a S106 directly tied to specific development(s) and the mitigation measures required or, through funding from the council's CIL and the addition of projects / funding requirements to the Strategic Priority Programme (SPP) List.

The Surrey Heartland Health & Care Partnership ICS also provided similar information relating to impact, mitigation and cost in regard to Acute Care Health Infrastructure. Again, it was stated that proportionate funding would be required with reference to S106, CIL and the council's SPP list.

8. Other Engagement Activities

SidM Health

Between 2020 and 2022, the council worked with the Surrey Heartland Health & Care Partnership ICS and Coplug D&t Ltd on a digital platform (SidM Systems) that will support the cyclical stages of planning of healthcare through spatial and predictive analytics of population, housing growth and health data under one cloud-based platform.

As a pilot for the project in Surrey, council officers worked jointly with the ICS having several meetings to help shape the programme. This also included workshops and training sessions to test and learn how to use the system.

The outcome of the project was a detailed report setting out likely need for new health infrastructure based on the level, location and timeframes for development as set out in the draft Local Plan. The report was produced by CoPlug for the ICS and was submitted as their response to the council's consultation on the preparation of the 2022 IDP.

Surrey County Council – Pharmaceutical Needs Assessment 2022

Public Health at Surrey County Council are writing a Pharmaceutical Needs Assessment on behalf of the Health and Wellbeing Board for Surrey. This is in the early stages however, the council has been working with Surrey colleagues to provide information relating to larger scale developments that have taken place since 2018 and are identified within the draft Local Plan.

Site Allocations

Consultation throughout the preparation of the Local Plan with the relevant Health Service Estates Teams, has also enabled the council to identify and assess development opportunities. There are several allocations within the draft Local Plan that seek to reprovide existing medical practices on-site alongside new residential development. These listed in the draft Local Plan and identified on the Policies Map with additional detail included in the Land Availability Assessment.

Category	Details
Summary of outcomes from strategic working:	<ol style="list-style-type: none"> 1. An understanding of the wider strategies that needed to be taken into consideration when preparing the draft Plan. 2. A robust and credible evidence base which sets out the requirements for health care in regard to our growth strategy. 3. Mechanisms in place to assist Health Care providers in securing funding for improvements through the Community Infrastructure Levy (CIL). 4. Detailed policies drafted that seek to prevent the loss or change of use of existing social and community uses, and which seek to support the provision of new facilities. 5. Site allocations for mixed uses for Health Care provision and new residential development.
Links to the draft Local Plan:	<ul style="list-style-type: none"> • The Vision – Elmbridge 2037 • Principle 5 – Providing infrastructure and connectivity • Policy SS3 – Scale and Location of growth

	<ul style="list-style-type: none"> • Policy ECO3 – Supporting our town, district and local centres • Policy INF1 – Infrastructure Delivery • Policy INF2 – Social and community uses • Policy INF3 – Health and wellbeing of communities • Site allocations
<p>On-going cooperation:</p>	<ol style="list-style-type: none"> 1. The council is working with the County Council and other Surrey boroughs and districts and identified Stakeholders to update the Surrey Infrastructure Study in support of the Surrey 2050 Place Ambition. 2. The council will continue to work with Public Health at Surrey County Council, assisting in the preparation of the Pharmaceutical Needs Assessment on behalf of the Health and Wellbeing Board for Surrey. 3. The council will continue to work with Strategic Partners to identify infrastructure needs arising from new development to be placed on the council's Strategic Priority Programme List for CIL funding and to regularly update the Infrastructure Delivery Plan as required. 4. Where appropriate, the council will address the issue of the health in the SoCGs to be drafted following the Regulation 19 Stage.

Strategic Priority C) Community facilities (such as health, education and cultural infrastructure)

Strategic Matter 8: Education

Category	Details
Strategic Planning Issue:	Understand the capacity of our existing education facilities and to identify whether improvements are required to support our growth strategy individually or in combination of that of our neighbouring authorities
Strategic Partners:	<ul style="list-style-type: none"> • London Borough of Richmond upon Thames • Royal Borough of Kingston upon Thames • Surrey County Council • Department for Education • Education Funding Agency
Key Evidence Base:	<ul style="list-style-type: none"> • Surrey Infrastructure Study (2017) • Surrey School Organisation Plan 2020 – 2030 • Infrastructure Delivery Plan (2018, 2019, 2022) • SA/SEA

This section is set out as follows:

1. **Surrey Strategic Infrastructure Study (2017)**
2. **Elmbridge Local Plan - Local Plan: Strategic Options Consultation (2016/17)**
3. **Local Plan Evidence Base Preparation (2018 – 2019)**
4. **Elmbridge Local Plan - Local Plan: Options Consultation (2019)**
5. **Local Plan Evidence Base Preparation (2019 – 2020)**
6. **Elmbridge Local Plan - Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)**
7. **Local Plan Evidence Base Preparation (2020 – 2022)**
8. **Other Engagement Activities**

Actions:

The above Strategic Partners have been engaged throughout the preparation of the new Elmbridge Local Plan including at the Regulation 18 consultation stages and in the preparation of the council's evidence base. Key activities have been set out below.

In addition, SCC in 2017 published the Surrey Strategic Infrastructure Study as part of initial work undertaken on the Surrey Local Strategic Statement (LSS). The details of the Study insofar as Elmbridge Borough have been summarised below for context as, this formed part of the early evidence informing the first Regulation 18 consultation.

1. Surrey Strategic Infrastructure Study (2017)

The council has worked in partnership with the County Council and other Surrey boroughs and districts to produce the Surrey Strategic Infrastructure Study 2017.

Each of the boroughs and districts has an existing or emerging local plan that sets out the planned development across its area and the infrastructure needed to support it in the short to medium term. This Study brings these plans together to provide a 'snap-shot' reflecting the position as at June 2017 and presents an overview of growth and infrastructure at the strategic level across Surrey and to highlight to government, infrastructure providers, developers, local communities and businesses the scale of investment required.

A wide range of stakeholders were engaged to inform the study including county and district council service providers, transport operators, utility companies, higher education providers, Clinical Commissioning Groups, the Environment Agency, Surrey Nature Partnership and the Coast to Capital and Enterprise M3 Local Economic Partnerships.

In regard to the Strategic Matter of education, the Study identified the need for, and opportunities for providing places in early year & childcare, primary education, secondary education, higher education and Special Educational Needs and Disabilities (SEND) provision. For Elmbridge the priorities were:

- 1FE primary expansion in Walton.
- New Secondary Free School required in north of the borough.
- Rebuilding of Three Rivers Academy (Formerly Rydens Enterprise School).

Given the need for these facilities in the short-term, the council has worked with the County Council and ElmWey Learning Trust to secure planning permission for a new 900-pupil secondary school (Heathside Walton-on-Thames) in the north of the borough. The school will be open to students from September 2022.

The former Rydens Enterprise School moved to their new building in February 2018 and changes to the Three Rivers Academy.

The Study formed part of the evidence base for the Surrey Local Strategic Statement (LSS) 2016–2031. However, is now being updated to in support of the Surrey Place Ambition. The council continues to be actively involved in this work through Surrey Futures.

2. Elmbridge Local Plan: Strategic Options Consultation (2016/17)

The consultation took place between 16 December 2016 and 24 February 2017.

Regarding the Strategic Matter of education, responses were received from the following Strategic Partners:

- Education Funding Agency (EFA) – noted that the significant growth in the housing stock expected in the borough (some 9,500 new homes) would place significant pressure on social infrastructure such as education facilities. It was stated that whilst the need for primary places is considered to be met to 2026, the Consultation document confirms this level of growth will give rise to the need for three additional primary and two secondary schools during the plan period. It was noted that this was based on a number of assumptions that would need to be considered in more detail as

the Local Plan progressed and the details clarified.

The EFA supported the approach of consulting on sites at a later date, supported by an Infrastructure Delivery Plan (IDP). The EFA supported the principle of safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the (then) NPPF. Support was also given for the siting of schools within allocated sites in locations that promote sustainable travel modes for pupils, staff and visitors. It was highlighted that when new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary.

In light of the above, the EFA encouraged close working during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places.

Reference was also made to the EFA already working proactively with the council to discuss potential site opportunities to meet the more immediate need for secondary school places in the north of the borough through the proposed Heathside Walton-on-Thames School.

- Surrey County Council – stated that they were aware of the general public concern throughout Surrey relating to the infrastructure delivery implications for new Local Plan development, particularly with regard to transport and education provision. The County Council acknowledged that under the duty to cooperate, authorities must work closely to identify the additional need and distribution for infrastructure and services.

With regard to future school capacity within the borough over the next ten years, it was stated that some extra provision at both primary and secondary phases will be required, especially if development need is to be met in full. The County Council stated that they may need to either expand existing schools or build new schools or undertake a mixture of both options. However, it was noted that the yield cannot be precisely estimated because additional need will depend on the size of units, their dispersal and location in terms of proximity to existing provision. As well as yield, the County Council would also need to consider the latent capacity in existing schools at the time of the new development being delivered.

3. Local Plan Evidence Base Preparation (2018 - 2019)

- **Infrastructure Delivery Plan (IDP) 2018**

The IDP (December 2018) identified the current baseline in relation to existing infrastructure in the borough. It also identified main areas of responsibilities and where possible, details of planned provision and potential provision required as a result of the Local Plan.

The IDP was prepared with the involvement of relevant stakeholders and based on information that the council managed to obtain from a range of sources including meetings with stakeholders, feedback received during previous consultations (pre-2018) and through direct stakeholder consultation between 30 April and 1 June 2018.

As set out in the IDP, the County Council modelled three scenarios for primary school provision based on a new housing trajectory of 600 homes per year for the next ten years. The first looked at the spread of new homes evenly across all ward in the borough. The two other scenarios looked at a larger concentration of homes geared

towards Cobham and the Dittons based on the identification of Key Strategic Areas within these communities.

The County Council confirmed that under each of the scenario the level of growth could be accommodated without the need for an additional school. This could be via bulge classes or, in the case of Cobham, it was stated that the County Council would probably consider a school re-organisation project within the existing Cobham schools to provide a small number of additional places, including more junior places.

In terms of secondary school provision, the County Council looked at the impact of 600 homes spread evenly across the borough (the only relevant scenario as there is only one secondary planning area which is coterminous with the Borough boundary). The County Council predicated a 3 FE shortage of places i.e. up to 90 additional Year 7 places required. It was stated that this could be created in the existing schools as well as additional places in other year groups.

Regarding Further Education Provision, information provided by Brooklands College and the County Council confirmed that an increasing proportion of young people are choosing to continue their learning in the workplace, thus reducing the demand on physical sites dedicated to teaching and learning. As a result, most further education providers in Surrey have experienced reduced funding contracts but have spare capacity and potential growth. Considering this, it was stated that it was likely that existing provision will accommodate any population growth between 2018 and 2026.

4. Elmbridge Local Plan: Options Consultation (2019)

The consultation took place between 19 August and 30 September 2019.

Regarding the Strategic Matter of education, the following comments were received:

- Department for Education – comments submitted largely repeated those made by the Education Funding Agency (EFA) to the previous consultation. It was stated that the next version of the Local Plan should seek to identify specific sites (existing or new) which can deliver the school places needed to support growth, based on the latest evidence of identified need and demand in the Infrastructure Delivery Plan (IDP). Furthermore, it was stated that the site allocations and/or associated safeguarding policies should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary.

The need to consider viability in the appraisal of options was highlighted as well as the need to be clear on mechanisms for delivery including funding. It was stated that Development Management policies should not be too onerous and have significant cost, timing and design implications on existing and new schools.

- Surrey County Council – stated that once the sites to be taken forward are identified, modelling and analysis work can be undertaken to review the implications of proposed development on the provision of county council infrastructure and measures that may be required to mitigate any specific impacts. The County Council referred back to their response to the previous Regulation 18 Consultation but added that there are currently local variations in the availability of school places across the borough. Under the duty it was acknowledged that officers will continue to liaise with the borough council on

implications for education provision as the Local Plan progresses.

5. Local Plan Evidence Base Preparation (2019 – 2020)

• Infrastructure Delivery Plan (IDP) 2019

The council updated and published the IDP in August 2019. In updating the IDP, the council asked infrastructure providers to consider the impact of delivering 623 every year during the plan period and sought comments on the document between 14 November and 16 December 2019.

The response received from Surrey County Council repeated the comments made and incorporated into the 2018 IDP.

DfE welcomed the opportunity to comment on the infrastructure needs in relation to what could arise from increases in housing growth over the plan period, and was pleased that the council was consulting relevant stakeholders early on in the plan-making process. DfE noted the outcome of the IDP updated based on the information provided and highlighted the importance of the need to continue to review the outcomes ensuring they are based on the most up to date information. Guidance was also provided on potential funding options for new schools.

6. Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

The consultation took place between 27 January and 9 March 2020.

The DfE added to previous comments made to the Options Consultation (2019) stating that policies regarding the safeguarding of schools' sites may need to be flexible given the requirements may change and they become surplus to requirement.

7. Local Plan Evidence Base Preparation (2020 – 2022)

Building on its earlier evidence base preparation, the council undertook the following activities in support of the preparation of the draft Local Plan.

• Infrastructure Delivery Plan (IDP) 2022

In support of the draft Local Plan, the council has prepared an updated IDP to reflect the level of development, including locations and timings, as set out in the council's preferred spatial strategy and the additional infrastructure required to accommodate / mitigate this. The council engaged infrastructure providers in August / September 2021.

Surrey County Council provided information relating to early years; Special Educational Needs (SEN) and Disability (SEND); primary; secondary and Further Education provision.

Regarding early years provision it was noted that 80% of the sector is Private, Voluntary and Independent (PVI) settings and therefore, difficult for the County Council to predict availability of Early Years places across the time frame of the Local Plan. It was suggested that in some areas there may be a deficit in provision however, this would need to be reviewed.

Surrey County Council identified a number of SEN and SEND schemes that were at various stages of delivery. This included provision at existing school sites and at new sites (e.g. Former Hurst Park Primary School which, has subsequently been removed from the council's list of allocations for residential provision). The County Council considered the delivery of these schemes to increase provision as vital infrastructure to meet current as well as long-term sufficiency needs - including arising from housing growth in Elmbridge.

In terms of primary provision, SCC reviewed the sites and the impact that the proposed scale of development would have on the primary education planning areas both in terms of the numbers, locations and anticipated timeframe for delivery of new homes. It was confirmed that the forecasts show that there are sufficient primary school places with surplus forecast in most planning areas.

It was stated that the latter years of the forecasts are based on the trends of birth rates falling and the planned housing, and therefore could change if birth rates increase, pupil movement changes or more housing comes through. It was stated that as the Local Plan timeline progresses, this will be monitored and if the forecast changes and there was a need for additional school places the County Council would look at bulge classes.

The County Council undertook the same process of reviewing sites and identifying the impact on secondary school provision. It was stated that the forecasts show there is a need for additional secondary school places. However, with the Heathside Walton-on-Thames school it is expected that there will be sufficient school places across secondary schools in Elmbridge to meet the pupil yield of the development proposed in the draft Local Plan.

Regarding Further Education, it was again noted that increasing proportion of young people are choosing to continue their learning in the workplace, thus reducing the demand on physical sites dedicated to teaching and learning. It was stated that as a result, most further education providers in Surrey have experienced reduced funding contracts but have spare capacity and potential growth to accommodate pupil yields.

8. Other Engagement Activities

Site Allocations

Throughout the preparation of the draft Local Plan, the County Council has been engaged as an Infrastructure Provider as well as a landowner. As a result of on-going discussions, the council is aware of proposed development schemes within the borough and has for example, removed the proposed allocation of the Former Hurst Park Primary School for residential development as the site is now identified as an opportunity to provide SEND provision.

In addition, the council has discussed opportunities with Brooklands College and DfE to regenerate their site to provide further education provision including a range of apprenticeships.

Surrey School Organisation Plan (2020 - 2030)

Surrey County Council has a statutory duty to ensure that there are enough school places in the county to meet demand. The County Council must therefore plan, organise and commission places for all state-funded schools in Surrey so that high standards are

maintained, diverse school communities created, and fluctuating pupil numbers are managed efficiently.

Working with the County Council to ensure that this requirement is met, the council provides housing data twice a year to feed into the County's modelling work. This includes data on sites with planning permission, sites under construction, recently completed and sites anticipated to come forward over the plan-period (the housing trajectory). Where relevant, the data given in relation to these sites includes the location; the number of units proposed; the types, size and tenure of the units; and the anticipated delivery timeframes.

Published in March 2021, the latest Organisation Plan covering the period 2020 – 2030 has been used by the County Council to inform its responses to the borough council in regard to school place provision.

Category	Details
Summary of outcomes from strategic working:	<ol style="list-style-type: none"> 1. An understanding of the wider strategies that needed to be taken into consideration when preparing the draft Plan. 2. A robust and credible evidence base which sets out the requirements for education in regard our growth strategy. 3. Options for addressing the potential additional need in primary school places in the north of the borough should the forecast decline in birth rates not materialize. 4. The removal of the Former Hurst Park Primary School as an opportunity to provide residential development so that SEND provision can be made. 5. The identification of Brooklands College as an area to provide Further Education provision.
Links to the draft Local Plan:	<ul style="list-style-type: none"> • The Vision – Elmbridge 2037 • Principle 5 – Providing infrastructure and connectivity • Policy SS3 – Scale and Location of growth • Policy ECO3 – Supporting our town, district and local centres • Policy INF1 – Infrastructure delivery • Policy INF2 – Social and community uses
On-going cooperation:	<ol style="list-style-type: none"> 1. The council will continue to provide housing data on a bi-annual basis, feeding into the County's modelling of the need for education places and likely areas of surplus / deficit. This will be used to update the County Council's Organisation Plan and the borough council's IDP. 2. Working with Strategic Partners to identify infrastructure needs arising from new development to be placed on the council's Strategic Priority Programme List for CIL funding and to regularly update the Infrastructure Delivery Plan as required.

	<ol style="list-style-type: none"><li data-bbox="621 178 1372 325">3. The council will continue to work with education providers in the consideration of any potential options for the delivery of education provision including as part of the planning application process.<li data-bbox="621 325 1372 474">4. Statements of Common Ground (SoCGs) or updated SOCGs will be sought with each HMA Partners, neighbouring authorities and other Strategic Partners to cover all relevant Strategic Matters including education.
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Strategic Priority D) Conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure, and planning measures to address climate change mitigation and adaption

Strategic Matter 9: Green & Blue Infrastructure

Category	Details
Strategic Planning Issue:	To protect and enhance our established network of green and blue spaces that stretches across the borough and into neighbouring authority areas in order to improve biodiversity, connectivity and access.
Strategic Partners:	<ul style="list-style-type: none"> • Environmental Agency • Greater London Authority • Guildford Borough Council • Historic England • Local Nature Partnership (Surrey Wildlife Trust) • London Borough of Richmond upon Thames • London Nature Partnership • Mole Valley District Council • Natural England • Open Space Society • Royal Borough of Kingston upon Thames • Royal Society for the Protection of Birds • Runnymede Borough Council • Spelthorne Borough Council • Sport England • Surrey County Council • Thames Landscape Strategy Partnership • Woking Borough Council
Key Evidence Base:	<ul style="list-style-type: none"> • Open Space & Recreation Assessment (2014) • Surrey Strategic Infrastructure Study (2017) • Play Pitch Strategy (2019) • Play Strategy (2020) • Green & Blue Infrastructure Study (2021) • Local Green Space Assessment (2022) • Play Strategy (2020) • SA/SEA • Surrey's 2050 Place Ambition

This section is set out as follows:

- 1. Local Plan Evidence Base Preparation (2014 – 2016)**
- 2. Surrey Strategic Infrastructure Study (2017)**
- 3. Elmbridge Local Plan - Local Plan: Strategic Options Consultation (2016/17)**
- 4. Local Plan Evidence Base Preparation (2018)**
- 5. Elmbridge Local Plan - Local Plan: Options Consultation (2019)**
- 6. Local Plan Evidence Base Preparation (2019)**
- 7. Elmbridge Local Plan - Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)**
- 8. Local Plan Evidence Base Preparation (2020 – 2022)**
- 9. Other Engagement Activities**

Actions:

The above Strategic Partners have been engaged throughout the preparation of the new Elmbridge Local Plan including at the Regulation 18 consultation stages and in the preparation of the council's evidence base. Key activities have been set out below.

1. Local Plan Evidence Base Preparation (2014 – 2016)

• **Local Green Space Assessment**

As part of the preparation of the Local Green Space Assessment, the council produced and consulted on a draft methodology (March 2014). Those engaged were identified on the basis of the council's Duty to Cooperate Scoping Statement (see 'Scoping the Matters' in Section of this document for more information) and consisted of:

- London Borough of Richmond upon Thames.
- London Nature Partnership¹⁶.
- Mayor of London / Greater London Authority.
- Open Space Society.
- Royal Borough of Kingston upon Thames.
- Sport England.
- Surrey Nature Partnership (Surrey Wildlife Trust).
- Royal Society for the Protection of Birds (RSPB)¹⁷.

The council asked if it had correctly interpreted Government Policy & Guidance, in drafting the methodology, if there was any other guidance the council should consider in reviewing the methodology and whether they were aware of any sites / areas which should be considered for designation.

Comments received including wider strategies to be considered and reflected in the criteria and scoring including for example, Natural England's 'Nature Nearby: Accessible Natural Greenspace Guidance' (March 2010).

Comments received and sites submitted have been considered / assessed and various iterations of the Local Green Space Assessment produced. In support of the draft Local Plan, the latest assessment is dated 2022.

2. Surrey Strategic Infrastructure Study (2017)

In 2017, SCC published the Surrey Strategic Infrastructure Study as part of initial work undertaken on the Surrey Local Strategic Statement (LSS). The details of this Study insofar as Elmbridge Borough have been summarised below for context as, this formed part of the early evidence informing the first Regulation 18 consultation.

The council worked in partnership with the SCC and other Surrey boroughs and districts to produce the Surrey Strategic Infrastructure Study 2017.

A wide range of stakeholders were engaged to inform the study including county and district council service providers, transport operators, utility companies, higher education providers, Clinical Commissioning Groups, the Environment Agency, Surrey Nature Partnership and the Coast to Capital and Enterprise M3 Local Economic Partnerships.

In regard to the Strategic Matter of Green & Blue Infrastructure, the Study assessed the demand for, and improvements required to support growth. This included the need to protect Biodiversity Opportunity Areas, provide for Suitable Alternative Natural Green Space (SANG) (see Strategic Matter 11) and increase access / connectivity to the countryside.

3. Elmbridge Local Plan: Strategic Options Consultation (2016/17)

The consultation took place between 16 December 2016 and 24 February 2017.

Regarding the Strategic Matter of Green and Blue Infrastructure, the following comments were received from the council's Strategic Partners:

- Environment Agency – noted that Elmbridge Borough Council is a partner in the delivery of the River Thames Scheme (RTS); a combination of flood risk measures along with environmental enhancements from Datchet to Teddington. It was recommended that any flood risk and other relevant policies, such as environmental policy, reflects this partnership and the need to safeguard land to deliver the RTS.

The EA stated they would welcome the continued protection of all open spaces and would recommend when considering the status of these locations that attention is given to the additional roles that Local Green Spaces can provide; for instance, flood plain, wildlife habitat and corridors as a vital part of green and blue infrastructure.

Support was given for the identification of river and canal banks, and the wider river and canal corridor, as an important part of Green Infrastructure. It was stated that watercourses are an important environmental asset and an undeveloped 8 metre buffer

¹⁶ The London Nature Partnership was not originally consulted on the Council's Duty to Cooperate Scoping Statement (February 2014). The Partnership was added to the list of those organisations to engage with in response to a comment received from another body.

¹⁷ RSPB was not originally identified as an organisation to be consulted on Local Green Space Designation as part of the Duty to Cooperate Scoping Statement (February 2014). The RSPB was added to the list of those organisations to engage with in response to a comment received from another body.

zone on both sides of a watercourse should be provided to promote green infrastructure, water quality and biodiversity.

- London Borough of Richmond upon Thames – noted that through previous Duty to Cooperate discussions the two authorities had identified the importance of the River Thames and the protection of designated open space and land for biodiversity value.
- Natural England – stated that a strategic approach to green infrastructure networks would also support a strategy for the ecological network. It was recommended that the policies be underpinned by evidence including a Green Infrastructure Strategy and that a specific policy be included in the Local Plan or, alternatively, integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.
- Surrey Wildlife Trust / Local Nature Partnership – gave their support for the council continuing to give a high level of protection to all open spaces, and to the designation of those spaces that meet the criteria for Local Green Spaces. The commitment to support biodiversity conservation and maintaining an effective and multi-functional network of Green Infrastructure was also welcomed.

4. Local Plan Evidence Base Preparation (2018)

- **Infrastructure Delivery Plan (IDP) 2018**

The IDP (December 2018) identified the current baseline in relation to existing infrastructure in the borough. It also identified main areas of responsibilities and where possible, details of planned provision and potential provision required as a result of the Local Plan.

The IDP was prepared with the involvement of relevant stakeholders and based on information that the council managed to obtain from a range of sources including meetings with stakeholders, feedback received during previous consultations (pre-2018) and through direct stakeholder consultation between 30 April and 1 June 2018. No responses were received in regard to the Strategic Matter of Green & Blue Infrastructure.

5. Elmbridge Local Plan: Options Consultation (2019)

The consultation took place between 19 August and 30 September 2019.

Regarding the Strategic Matter of Green & Blue Infrastructure, the following comments were received from the council's Strategic Partners:

- Natural England – highlighted elements of the Green & Blue Infrastructure network that should be protected for their biodiversity value e.g. ancient woodland, aged and veteran trees. Stated that a strategic approach for Green Infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the then NPPF. It was highlighted that Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery.

It was stated that evidence of a strategic approach can be underpinned by a Green Infrastructure Strategy. Natural England encouraged the provision of Green Infrastructure to be included as a specific policy in the Local Plan or alternatively

integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.

6. Local Plan Evidence Base Preparation (2019)

• Infrastructure Delivery Plan (IDP) 2019

The council updated and published the IDP in August 2019. In updating the IDP, the council asked infrastructure providers to consider the impact of delivering 623 every year during the plan period and sought comments on the document between 14 November and 16 December 2019.

On 16 December 2019, the Environment Agency provided comments relating to the Strategic Matter of Green & Blue Infrastructure and points for the council to consider. Their response stated:

“We encourage the protection and enhancement of the natural environment through blue and green infrastructure, buffer zones and designated sites. We welcome the inclusion of water bodies in Green Infrastructure. This could be expanded to include Blue Infrastructure and make reference to main rivers...”

When determining sites, you should consider the following in the very early stages:

- Sites that contain, or are adjacent to, watercourses should consider the impact that development can have on them. In order to protect and enhance watercourses, we require an undeveloped buffer zone, measuring a minimum of 10m from the top of the riverbank, on both sides of the watercourse.
- We would not support options that will require culverting of watercourses or hard bank revetment or prevent future opportunities for de-culverting and naturalisation of river banks.”

7. Elmbridge Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

The consultation took place between 27 January and 9 March 2020.

Regarding the Strategic Matter of Green & Blue Infrastructure, the following comments were received from the council's Strategic Partners:

- Environment Agency – stated that in order to ensure natural assets can be conserved and enhanced, the plan should define green and blue infrastructure. Advice was provided as to the benefits of green and blue infrastructure and linking assets for natural conservation, biodiversity and climate change mitigation.
- Surrey County Council – recommend that the vision could be extended to include the protection and enhancement of biodiversity.

8. Local Plan Evidence Base Preparation (2020 – 2022)

• Green & Blue Infrastructure Study (2021)

This Green and Blue Infrastructure Study recognises that well- planned, managed and delivered Green and Blue infrastructure is vital to the health and wellbeing of the

borough's residents and physical environment. This study provides an overview, at a strategic level, of the green and blue infrastructure network which currently exists in Elmbridge and presents opportunities for how green and blue infrastructure can be incorporated into new development typologies.

The Study also seeks to establish links with other wider Strategies including for example, Surrey's Climate Change Strategy (2020) which includes an ambition to see 1.2 million new trees planted within the county by 2030. The County has prepared a supporting Tree Strategy which the Green & Blue Infrastructure Study builds upon; identifying how the council through its draft Local Plan can contribute towards the delivery of the County Council's ambition. The Study identifies that the council will need to work in partnership with the County Council as well as other landowners and developers.

- **Infrastructure Delivery Plan (IDP) 2022**

In support of the draft Local Plan, the council has prepared an updated IDP to reflect the level of development, including locations and timings, as set out in the council's preferred spatial strategy and the additional infrastructure required to accommodate / mitigate this. The council engaged infrastructure providers in August / September 2021.

In regard to open space and recreation, Natural England stated the need to ensure sufficient SANG capacity is identified and provided general advice as to the need to consider the potential impacts and opportunities in relation to environmental conservation, protection and enhancement, including provision of green infrastructure (GI) and net gain.

9. Other Engagement Activities

The River Thames Scheme

As set out in Section 5 of this Statement, the River Thames Scheme is promoted by the EA and seeks to reduce flood risk to people living and working near the Thames, enhance the resilience of nationally important infrastructure, contribute to a vibrant local economy and maximise the social and environmental value of the river.

The scheme involves the building of a new flood channel alongside the River Thames to reduce flood risk to 15,000 properties and 2,400 businesses in communities along the river including Weybridge, Molesey, and Thames Ditton. The channel will be built in 3 sections including the widening of the Desborough Cut (Elmbridge Borough) and increasing the capacity of the weir at Molesey (amongst others) by installing additional weir gates. Other benefits of the scheme include the increased resilience of the road, rail, power and water networks as well as the creation of 106 hectares of new public open space and 23 km of new pathways. Biodiversity for wildlife will also improve through the creation of 250 hectares of new habitat.

In response to flooding, flood risk and the RTS a number of groups have been set up. The main groups are the Lower Thames Planning Officers Group, the Programme Board and a Consents & Authorisations Project Board. These groups comprise officers from the local authorities of Elmbridge, Kingston, Richmond, Runnymede, Spelthorne, Windsor & Maidenhead as well as Surrey County Council. In addition to the Environment Agency, the scheme is also being delivered in partnership with the Thames Valley Berkshire and Enterprise M3 LEPs, Thames Water, Thames Regional Flood and Coastal Committee (RFCC) and the Department for Environment Food and Rural Affairs (Defra).

The Programme Board has recently considered the preferred mechanism to gain planning

consent for all aspects of the scheme and how local authorities across the Lower Thames can consistently reflect the RTS in their Local Plans. A Service Level Agreement (SLA) has been agreed detailing joint working.

Through the preparation of the draft Local Plan the council has ensured the safeguarding of Desborough Island and reflected where relevant the ambitions of the Scheme within its emerging policies.

Thames Landscape Strategy

Informing elements of the draft Local Plan is the Thames Landscape Strategy (TLS) (2012) and Action Plan 2017 – 2020 that has been prepared by the TLS coordinator and agreed by the TLS Executive Review Group, Officers Steering Committee and Community Advisory Group. The purpose of the Action Plan is to set out how the aims of the Thames Landscape Strategy Partnership will be achieved.

Actions relevant to Elmbridge Borough are encompassed in Reach 1- 2: Bushy / Hurst Park / Hampton Court and Reach 13 – 16: Weybridge to Hurst Park and includes elements which have already been implemented e.g. improved sign-posting along the Tow Paths which have been provided with the assistance of Community Infrastructure Levy (CIL) funding. Other Actions are linked to the River Thames Strategy such as the safeguarding of Desborough Island.

Category	Details
<p>Summary of outcomes from strategic working:</p>	<ol style="list-style-type: none"> 1. An understanding of the wider strategies that needed to be taken into consideration when preparing the draft Local Plan. 2. A robust and credible evidence base which identifies the Green & Blue Infrastructure network across the borough that needs to be protected and enhanced including the designation of Local Green Space. 3. The requirement for proposed development sites to ensure that important wildlife corridors are maintained and connectivity with / access to the wider countryside beyond the site to be provided. 4. A local set of criteria for how the Council will seek to implement the County Council’s tree planting ambitions.
<p>Links to the draft Local Plan:</p>	<ul style="list-style-type: none"> • The Vision – Elmbridge 2037 • Principle 1 – Tackling Climate Change • Principle 2 – Protecting and enhancing the quality of the environment • Principle 5 – Providing infrastructure and connectivity • Policy SS1 – Responding to the climate emergency • Policy SS2 – Sustainable place-making • Policy CC5 – Managing flood risk • Policy ENV1 – Green and blue infrastructure • Policy ENV2 – Landscape, trees and woodlands • Policy ENV3 – Local Green Spaces • Policy ENV5 – Thames Basin Heaths Special Protection Area

	<ul style="list-style-type: none"> • Policy ENV6 – Protecting, enhancing and recovering biodiversity • Policy INF1 – Infrastructure delivery • Policy INF3 – Health and wellbeing of communities • Policy INF4 – Play and informal recreation spaces • Policy INF6 – Rivers
<p>On-going cooperation:</p>	<ol style="list-style-type: none"> 1. The council will continue to explore how connections in the Green & Blue Infrastructure network can be improved between authority areas. 2. The council is working with the County Council and other Surrey boroughs and districts and identified Stakeholders to update the Surrey Infrastructure Study in support of the Surrey 2050 Place Ambition. 3. Working with Strategic Partners to identify infrastructure needs arising from new development to be placed on the council's Strategic Priority Programme List for CIL funding and to regularly update the Infrastructure Delivery Plan as required. 4. Statements of Common Ground (SoCGs) or updated SOCGs will be sought with each HMA Partner, neighbouring authorities and other Strategic Partners to cover all relevant Strategic Matters including Green & Blue Infrastructure.

Strategic Priority D) Conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure, and planning measures to address climate change mitigation and adaption

Strategic Matter 10: Green Belt & Landscape

Category	Details
Strategic Planning Issue:	<p>Protecting the integrity of the Metropolitan Green Belt and the borough’s natural landscape – the Local Plan seeks to protect the Green Belt and its natural landscape from within Elmbridge from inappropriate development that would undermine its integrity and purpose. The council must also however, explore all opportunities for meeting its development needs and consider whether there are the exceptional circumstances for amending the Green Belt boundary.</p>
Strategic Partners:	<ul style="list-style-type: none"> • Epsom and Ewell Borough Council (EEBC) • Guildford Borough Council (GBC) • London Borough of Richmond upon Thames (LBR) • Mole Valley District Council (MVDC) • Reigate & Banstead Borough Council (RBBC) • Royal Borough of Kingston upon Thames (RBK) • Runnymede Borough Council (RBC) • Spelthorne Borough Council (SBC) • Surrey County Council (SCC) • Surrey Heath Borough Council (SHBC) • Tandridge District Council (TDC) • Waverley Borough Council (WaBC) • Woking Borough Council (WBC) <p>The above authorities are those that share a boundary with the borough and / or form part of the Surrey boroughs and districts that are located in neighbouring HMAs.</p> <p>The council has also sought to engage with the Greater London Authority (GLA) given that the Green Belt within Elmbridge falls within the wider Metropolitan Green Belt around London.</p> <p>During the early stages of the evidence base review on this Strategic Matter, the council also engaged with the South London Partnership and West London Alliance as they represent the interests of groups of London Authorities that have been identified through our initial work (in regard to the HMA) as having links with Elmbridge. The council also sought to engage the Enterprise M3 LEP, Highways Agency / Highways England and Homes and Communities Agency (HCA) / Homes England (HE) insofar as meeting housing need and the potential option of amending Green Belt boundaries to do so.</p>

	<p>In regard to Landscape, in addition to those Strategic Partners identified above, the council has also engaged with:</p> <ul style="list-style-type: none"> • Historic England (HE) • Natural England (NE) • Surrey Wildlife Trust (SWT)
Key Evidence Base:	<ul style="list-style-type: none"> • Review of Absolute Constraints (2016, 2019, 2021) • Green Belt Boundary Review (2016) • Green Belt Boundary Review Supplementary Work - (2018) • Landscape Sensitivity Study (2019) • The Strategic Views Study (2019) • How the Spatial Strategy was formed (2022) • SA/SEA

This section is set out as follows:

- 1. Local Plan Evidence Base Preparation (Late 2014 – 2016)**
- 2. Elmbridge Local Plan - Local Plan: Strategic Options Consultation (2016/17)**
- 3. Local Plan Evidence Base Preparation (2017 - 2019)**
- 4. Elmbridge Local Plan - Local Plan: Options Consultation (2019)**
- 5. Elmbridge Local Plan - Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)**
- 6. Local Plan Evidence Base Preparation (2021 – 2022)**
- 7. Other Local Authorities Green Belt Reviews**
- 8. A strategic approach to Green Belt**

Actions:

To inform its draft Local Plan policies including the consideration of the spatial strategy for the borough and the allocation of sites, the council has undertaken a series of activities including, engagement at the Regulation 18 consultation stages and in the preparation of the council's evidence base.

Key activities relating to the Green Belt & Landscape have been set out below.

1. Local Plan Evidence Base Preparation (Late 2014 – 2016)

- **Review of Absolute Constraints (2016)**

In 2016 the council published a document identifying the 'absolute constraints' to development within the borough. Whilst Parks and Gardens of Special Historic Interest and their settings are designated as heritage assets, they are also important

in contributing to the natural environment and landscape of the borough.

In the Review document, our Registered Parks and Gardens (Claremont, Oatlands and Painshill) are identified as an 'absolute constraint' as they are fragile features and a finite resource that can easily be damage beyond repair.

As part of the preparation of the document, on 16 July 2015, the council consulted on a draft methodology. Responses were received from:

- Environment Agency
- Epsom & Ewell Borough Council
- Greater London Authority
- Mole Valley District Council
- Natural England
- Runnymede Borough Council
- Spelthorne Borough Council
- Surrey County Council

On 14 August 2015, the council was contacted by Historic England stating that they had missed the consultation deadline asking if comments were still being accepted. The council responded on 17 August 2015, sending a copy of the responses received and how the council intended to address them. It was stated that if their comments had not already been addressed, then these could be provided. The council received no further response.

A summary of the comments received and how the council responded is set out in Appendix 6.

- **Green Belt Boundary Review (2016)**

On 26 November 2014, the council approached those authorities in the HMA area to gauge interest in the commissioning of a joint assessment of the Green Belt within the HMA area. The council considered there to be significant value in undertaking the Review jointly across the HMA area; ensuring consistency in approach and would clearly joint working to look at both objectively assessed need and how we have sought to meet it across the area as a whole.

Through formal and informal responses, the outcome was that the council commissioned this work individually although continued to engage the HMA partners and other relevant Stakeholders in the process.

Having commissioned the Review, the council held a Workshop on 19 May 2015. The purpose of the Workshop was to:

- share and discuss the identification of land parcels for assessment and the methodology that will be used to assess land currently designated as Green Belt;
- discuss emerging ideas on strategic Green Belt areas across Surrey and the London Fringe Area; and
- explore neighbouring authorities' different approaches to Green Belt in more detail, including any confirmed or potential release of Green Belt or major Green Belt developments planned in these areas.

Following the Workshop, discussions were held again with EEBC about the council joining the Review and the implications for LBK given that Elmbridge and Epsom & Ewell boroughs do not adjoin. EEBC confirmed that they were not intending to join the Review.

In addition to the Workshop, the council formally consulted on the draft Methodology (28 May 2015). Responses were received from:

- Epsom & Ewell Borough Council
- Greater London Authority
- Guildford Borough Council
- Homes Communities Agency (Homes England)
- Mole Valley District Council
- Royal Borough of Kingston upon Thames
- Runnymede Borough Council
- Spelthorne Borough Council
- Tandridge District Council

In response to the consultation, a number of amendments were made to the draft methodology which, when finalised was sent to all Strategic Partners (27 July 2015). The council also sent a Summary of Consultation Responses that set out all the responses to the consultation and how the council and Consultants had addressed each one (see Appendix 7).

Prior to the publication of the draft Review, the council first engaged (8 September 2015) the neighbouring boroughs and districts whereby Local Areas had been identified that cross over into their authorities. This included:

- Guildford Borough Council
- Mole Valley District Council
- Royal Borough of Kingston upon Thames
- Runnymede Borough Council
- Spelthorne Borough Council
- Woking Borough Council

The purpose of this exercise was to ensure consistency with similar studies undertaken by neighbouring authorities and to address any issues as early as possible and prior to a more formal consultation on the draft Review with all appropriate Strategic Partners.

Comments were received from:

- Guildford Borough Council
- Mole Valley District Council
- Runnymede Borough Council
- Spelthorne Borough Council

A summary of the comments received and how they were addressed by the council and consultant is set out in Appendix 8.

The draft report was sent to appropriate Strategic Partners on 18 December 2015. Comments were received from:

- Greater London Authority
- Mole Valley District Council
- Richmond upon Thames
- Royal Borough of Kingston upon Thames
- Runnymede Borough Council
- Spelthorne Borough Council

Comments received were considered and informed the finalisation of the Review. A summary of the comments received and how they were addressed by the council and consultant is set out in Appendix 9.

The outcome of this Review was an assessment of the Green Belt within Elmbridge Borough and its strategic-purpose in terms of the contribution it makes to the wider Metropolitan Green Belt and well as an individual assessment of Local Areas of Green Belt against the Purposes (those relevant as set out in the National Planning Policy Framework). The Review identified areas that were strongly, moderately and weakly performing against the Green Belt purposes and a number which, subject to further consideration could be identified for future development.

Alongside other evidence base work completed, the Review informed the preparation of the Local Plan: Strategic Options Consultation.

2. Elmbridge Local Plan: Strategic Options Consultation (2016/17)

The consultation took place between 16 December 2016 and 24 February 2017.

Regarding the Strategic Matter of Green Belt and Landscape, the following comments were received from the council's Strategic Partners:

- Greater London Authority – noted the objections raised by the Royal Borough of Kingston upon Thames (the identification of site in the Green Belt for potential release / future development on the shared boroughs boundary).
- Historic England – noted the options under consideration and suggested that it might be worth looking at a combination of some options.
- London Borough of Richmond – agreed with the significant weight to be placed on the protection of Green Belt and the overall integrity and function in accordance with the NPPF and stance of the GLA.
- Mole Valley District Council – acknowledged that Option 2 (the preferred option at the time) struck a balance between meeting need in the urban area and the protection of Green Belt.
- Royal Borough of Kingston upon Thames – strongly objected to the identification of land at Long Ditton as a Key Strategic Area.
- Runnymede Borough Council – sought further discussions on the reference to amending Green Belt around Brooklands to meet employment need if the opportunity was pursued.
- Spelthorne Borough Council – wished to be fully satisfied that all options in regard to meeting housing need, including density increases, had been fully considered before the release of any Green Belt. Some concerns as to the methodology of the

Green Belt Boundary Review were raised.

- Surrey County Council – advanced the strong support for the continued protection of the Green Belt but that if the council considered there were the exceptional circumstance to amend the boundary, it would look at its land holdings.

3. Local Plan Evidence Base Preparation (2017 – 2019)

In response to comments received to the Local Plan: Strategic Options Consultation, the council commissioned a Green Belt Boundary Review – Supplementary Work. The council also commissioned a Landscape Sensitivity Assessment (2019) to help inform the council's consideration of the development options.

• Green Belt Boundary Review – Supplementary Work (2018)

In 2017 the council embarked on a further Green Belt evidence base document which looked at the Local Areas identified in the Green Belt Boundary Review 2016 in further detail, breaking these down to sub-areas and assessing these against the purposes of Green Belt as well as whether their removal would undermine the wider integrity.

As this work was a continuation of the 2016 Review, the work was commissioned for the borough as opposed to a joint evidence base with neighbouring authorities. As with the previous Review, Strategic Partners were engaged in the process starting with seeking comments on the draft methodology (5 December 2017).

Responses were received from:

- Highways England (HE)
- Royal Borough of Kingston upon Thames
- Surrey County Council
- Reigate and Banstead Borough Council
- Tandridge District Council
- Richmond and Wandsworth Councils
- Epsom and Ewell Borough Councils
- Runnymede Borough Council

In response to the consultation, a number of amendments were made to the draft methodology. How the council and Consultants addressed the comments received is set out in Appendix 10.

The draft report was sent to appropriate Strategic Partners in December 2018. No comments were received.

The outcome of this Review was an assessment of the Green Belt within Elmbridge Borough at a finer grain against the Green Belt Purposes as well as the overall integrity of the Green Belt. The Review identified areas that were strongly, moderately and weakly performing against the Green Belt purposes as well as the level of importance they play in maintain the integrity of the Green Belt.

• Landscape Sensitivity Assessment (2019)

Assesses the extent to which the character and quality of the landscape in the Borough is sensitive to change from the introduction of a development scenario, in this case large scale residential and mixed-use development. Included within the assessment

was the consideration of the cultural and historic character of the area. In assessing this criterion, heritage designations (both statutory and local including Conservation Areas and Historic Parks) and Historic Landscape Characterisation (HLC) data was utilised.

In preparing the Assessment, the appointed consultants (ARUP) prepared a draft methodology for consultation. This was shared with Strategic Partners as part of duty to co-operate requirements, on 20 September 2018.

Responses were received from:

- MVDC (2 October 2018) – stating that they had no comments on the methodology which seems comprehensive and logical.
- RBC (27 September 2018) – stating that they had no comments to make at this time.
- SCC (1 October 2019) – stating that the source material looks comprehensive and the only additional source recommended to include being the Biodiversity Opportunity Areas (BOAs). A list of relevant BOAs to Elmbridge were provided.
- SWT (1 October 2019) – stating that GIS data should also include (under Ecology designations), non-statutory Local Sites (i.e. Sites of Nature Conservation Importance in Surrey) and BOA. Links were provided to where this information could be sourced.

The council subsequently provided additional GIS layers to the consultants and BOAs and other ecology designations were referred to in the Assessment where relevant.

- **The Strategic Views Study (2019)**

Linked to the above assessment, this Study looked at the existing Strategic Views designations contained within the Core Strategy 2011 and assessed whether there was still the justification for its retention and of the seven views.

The methodology for the Study was combined with the Landscape Sensitivity Assessment methodology, which was shared with adjacent local authorities as part of duty to co-operate requirements, on 20 September 2018.

As set out above, those Strategic Partners that responded considered the methodology to be comprehensive and logical. No specific comments were received relating to the approach to the assessment of strategic views.

4. Elmbridge Local Plan: Options Consultation (2019)

The consultation took place between 19 August and 30 September 2019.

Regarding the Strategic Matter of Green Belt and Landscape, the following comments were received from the council's Strategic Partners:

- Epsom & Ewell Borough Council, Mole Valley District Council, Surrey County Council, Waverley Borough Council and Woking Borough Council – all broadly agreed or supported the Options which would seek to meet development need

(Options 3 & 5) which both included the potential use of land currently designated as Green Belt to meet development need to varying extents.

- Richmond and Wandsworth Councils – emphasised the need to demonstrate exceptional circumstances prior to the consideration of amending Green Belt boundaries.
- Royal Borough of Kingston upon Thames – strongly objected to the identification of land at Long Ditton as a Key Strategic Area.
- Spelthorne Borough Council – supported the approach to only releasing weakly performing Green Belt and that which is not essential for the wider strategic Green Belt to function. It was stated that all land that is deemed to perform weakly should be fully considered to ensure that suitable alternative options for meeting the development needs of the Borough are maximised. It was noted that none of the options that included Green Belt release appeared to include any parcels located immediately adjacent to Spelthorne’s boundary with Elmbridge, as such, this approach was supported.

5. Elmbridge Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

The consultation took place between 27 January and 9 March 2020.

Regarding the Strategic Matter of Green Belt and Landscape, the following comments were received from the council’s Strategic Partners:

- Historic England – welcomed the inclusion of ‘protecting and enhancing the borough’s historic and cultural assets and natural landscape.

6. Local Plan Evidence Base Preparation (2021 – 2022)

How the Spatial Strategy was formed (2022)

This paper explains how the council has developed its recommended preferred strategy; using a range of factors to inform the development and consideration of reasonable options and, how these have been narrowed down prior to the selecting of a preferred option as set out in the draft Local Plan.

As set out in the document, the council has considered the Strategic Matter of Green Belt and Landscape in examining the options. Discussions with neighbouring authorities have also shaped the council’s plan-making process, as set out in the paper.

This document has been published alongside the draft Local Plan (June 2022). Should any comments from neighbouring authorities be received on the document, these will be recorded in the Supplementary Statement to be prepared outlining duty to cooperate activities from June 2022 onwards.

7. Other Local Authorities’ Green Belt Reviews

To assist neighbouring authorities with the preparation of their Local Plans including the evidence base, the council, where invited has provided comments or taken part in workshops on other Green Belt reviews. This includes for the following neighbouring

authorities:

- Epsom & Ewell Borough Council
- Guildford Borough Council
- Royal Borough of Kingston upon Thames
- Runnymede Borough Council
- Spelthorne Borough Council
- Surrey Heath Borough Council
- Woking Borough Council

The council has sought to provide constructive comments focusing on the extent to which the approach of other LPAs to assessing Green Belt is consistent with that taken by the council. The council has also sought to ensure that the findings of assessments are consistent e.g. where areas of Green Belt straddle borough boundaries.

8. A strategic approach to Green Belt

The council has long advocated a strategic approach to the consideration of options for meeting development needs including the consideration of Green Belt.

As the Green Belt within Elmbridge forms part of the Metropolitan Green Belt around London, the council has lobbied the Mayor / GLA to undertake a comprehensive review of the Green Belt as opposed to individual assessments (EBC's Response, Draft London Plan 2019 – 2041 Consultation). To date this has not been undertaken and the Mayor has stated that there is no intention to do so and (previously) stated it will not support individual London Boroughs from amending Green Belt boundaries through their Local Plans.

Category	Details
Summary of outcomes from strategic working:	<ol style="list-style-type: none"> 1. A robust methodology for the assessment of Green Belt against the purposes (as set out in the NPPF) which is consistent with that of neighbouring boroughs. 2. A robust methodology for the assessment of the natural Landscape within Elmbridge and its sensitivity to change. 3. A comprehensive assessment of Green Belt and natural Landscape within Elmbridge. 4. A clear audit of how the council has considered the issue of Green Belt and Landscape when considering the spatial strategy options and how the duty to cooperate has informed this process. 5. The maintenance of the Green Belt boundary.
Links to the draft Local Plan:	<ul style="list-style-type: none"> • The Vision – Elmbridge 2037 • Principle 2 – Protecting and enhancing the quality of the environment • Policy SS2 – Sustainable place-making • Policy ENV2 – Landscape, trees and woodlands • Policy ENV4 – Development in the Green Belt • Policy ENV9 – Urban design

On-going cooperation:	<ol style="list-style-type: none">1. The council will continue to co-operate with neighbouring boroughs and districts to ensure that integrity of the wider- Metropolitan Green Belt is maintained as well as the importance of our shared natural landscape.2. Through joint working on the Surrey 2050 Place Ambition, the council will continue to work with the County Council and Surrey Authorities to see how a long-term strategic approach could be taken to accommodating the development needs and ambitions of Surrey.3. Statements of Common Ground (SoCGs) or updated SOCGs will be sought with each HMA Partner, neighbouring authorities and other Strategic Partners to cover all relevant Strategic Matters including Green Belt & Landscape.
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Strategic Priority D) Conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure, and planning measures to address climate change mitigation and adaption

Strategic Matter 11: Natural Environment including the Thames Basin Heaths Special Protection Area (SPA)

Category	Details
Strategic Planning Issue:	Ensuring that the council's growth strategy can be accommodated without undermining the integrity of the Thames Basin Heaths SPA, including through the identification and provision of appropriate mitigation.
Strategic Partners:	<ul style="list-style-type: none"> • Environment Agency • Epsom & Ewell Borough Council • Greater London Authority • Guildford Borough Council • Joint Strategic Partnership Board (JSPB) • London Borough of Richmond upon Thames • Mole Valley District Council • Natural England • Royal Borough of Kingston upon Thames • Runnymede Borough Council • Spelthorne Borough Council • Surrey County Council • Surrey County Council • Woking Borough Council
Key Evidence Base:	<ul style="list-style-type: none"> • Thames Basin Heaths SPA Delivery Framework (12 February 2009) (Thames Basin Heaths JSPB) • Review of Absolute Constraints (2016, 2019, 2021) • Infrastructure Delivery Plan (IDP) (2018, 2019, 2022) • Habitats Regulation Assessment of the Regulation 18 Local Plan Options Consultation (2019) • Habitats Regulation Assessment / Appropriate Assessment of the draft Local Plan (2022) • Thames Basin Heaths Special Protection Area Avoidance and Mitigation Strategy (2022) • SA/SEA • Surrey's 2050 Place Ambition

This section is set out as follows:

- 1. Thames Basin Heaths SPA Delivery Framework (2009)**
- 2. Local Plan Evidence Base Preparation (2015 – 2016)**
- 3. Elmbridge Local Plan - Local Plan: Strategic Options Consultation (2016/17)**
- 4. Local Plan Evidence Base Preparation (2016/17 - 2018)**

- 5. Elmbridge Local Plan - Local Plan: Options Consultation (2019)**
- 6. Local Plan Evidence Base Preparation (2019)**
- 7. Elmbridge Local Plan - Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)**
- 8. Local Plan Evidence Base Preparation (2020 – 2022)**
- 9. Other Engagement Activities**

Actions:

The above Strategic Partners have been engaged throughout the preparation of the new Elmbridge Local Plan including at the Regulation 18 consultation stages and in the preparation of the council's evidence base. Key activities have been set out below.

In addition, as set out in Section 5 of this Statement, a number of mechanisms were in place to ensure co-operation on the Strategic Matter of the Thames Basin Heaths SPA prior to the commencement of the new Local Plan. These mechanisms and outputs have therefore been utilised in addressing this Strategic Matter and ensuring that the development strategy for the borough can be accommodated without undermining the integrity of the SPA, including the identification and provision of appropriate mitigation.

These mechanisms have been summarised below for context.

1. Thames Basin Heaths SPA Delivery Framework (2009)

As part of the Thames Basin Heaths SPA Delivery Framework (2009), NE has agreed a three- pronged approach to overcome the adverse effects on the SPA which arise mainly from the recreational use of the SPA by local people and the effects of urbanisation. The three prongs are:

- The provision of Suitable Alternative Natural Greenspace (SANG) to attract people away from the SPA
- Monitoring of the SPA and access management measures to reduce the impact of people who visit the SPA
- Habitat management of the SPA to improve the habitat for the ground nesting birds.

The third prong is delivered by NE. The second prong is delivered by the JSPB and NE, although the council collects the funds through appropriate development schemes to enable the work.

As part of its preparation of the draft Local Plan, it is the first prong that has been the council's focus in regard to addressing this Strategic Matter in co-operation with other Strategic Partners. That is, the council having the responsibility for ensuring that SANG avoidance is provided when granting permission for new residential developments that would have an impact on the SPA and that sufficient SANG capacity can be identified to mitigate the emerging development strategy.

2. Local Plan Evidence Base Preparation (2015 – 2016)

- **Review of Absolute Constraints (2016)**

In 2016 the council published a document identifying the 'absolute constraints' to development within the borough. In regard to the Strategic Matter of the Natural Environment, the Thames Basin Heaths SPA, RAMSAR sites and SANG were all identified as absolute constraints.

As part of the preparation of the document, on 16 July 2015, the council consulted on a draft methodology. Responses were received from:

- Environment Agency
- Epsom & Ewell Borough Council
- Greater London Authority
- Mole Valley District Council
- Natural England
- Runnymede Borough Council
- Spelthorne Borough Council
- Surrey County Council

On 14 August 2015, the council was contacted by Historic England stating that they had missed the consultation deadline and were comments still being accepted. The council responded on 17 August 2015, sending a copy of the responses received and how the council intended to address them. It was stated that if their comments had not already been addressed, then these could be provided. The council received no further response.

A summary of the comments received and how the council responded is set out in Appendix 5.

In 2021, the Review was updated to expand the list of absolute constraints to include Lowland Fens which is classified as an irreplaceable habitat in the NPPF.

3. Elmbridge Local Plan: Strategic Options Consultation (2016/17)

The consultation took place between 16 December 2016 and 24 February 2017.

Only NE responded to the Strategic Options Consultation raising points related to the Thames Basin Heaths SPA. In their response, NE commented that it may necessary to outline avoidance and/or mitigation measures at the plan level, including a clear direction for project level Habitat Regulation Assessment (HRA) work to ensure no adverse effect on the integrity of internationally designated sites.

In addition, NE stated that it might be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one LPA, such as the Thames Basin Heath SPA.

It was stated by NE that the use of SANGs is a strategic solution approach for the Thames Basin Heaths SPA which has been agreed across LPA areas in order to mitigate recreational impacts of development in close proximity to the designated site. NE confirmed their agreement with this approach to ensure that development does not have a likely significant effect on the SPA.

4. Local Plan Evidence Base Preparation (2016/17 – 2018)

To inform its draft Local Plan policies including the consideration of the spatial strategy for the borough and the allocation of sites, the council has undertaken a series of activities

including preparing a several evidence base documents.

Relating to the Thames Basin Heaths SPA this included:

- **Identification of addition SANG – early discussions with NE**

Working in collaboration with NE commenced in 2016/17 when, as part of the Strategic Options Consultation, it was first identified that depending on the preferred growth strategy for the borough, the potential impact of new development on the SPA was unlikely to be mitigated through the existing SANG sites.

Through a series of emails and meetings with NE potential SANG sites were discussed. This included sites previously considered as part of the preparation of the Local Plan: Core Strategy (2011) but not required at the time and, additional sites that had been identified as potential options subsequent to this.

Joint site visits with NE Advisors and officers from the council were undertaken in January 2018. NE provided advise as to the suitable of the areas as SANG. The council also revisited previous advice provided by the SCC as some opportunities were identified as Mineral Safeguarding Areas.

- **Infrastructure Delivery Plan (IDP) 2018**

The IDP (December 2018) identified the current baseline in relation to existing infrastructure in the borough. It also identified main areas of responsibilities and where possible, details of planned provision and potential provision required as a result of the Local Plan.

The IDP was prepared with the involvement of relevant stakeholders and based on information that the council managed to obtain from a range of sources including meetings with stakeholders, feedback received during previous consultations (pre-2018) and through direct stakeholder consultation between 30 April and 1 June 2018.

No responses were received in regard to SANG and biodiversity.

- **Habitats Regulation Assessment of the Regulation 18 Local Plan Options Consultation (2019)**

In support of the preparation of the Local Plan, the council has prepared a HRA. The first stage of the HRA was undertaken in 2018/19, in support of the Local Plan: Options Consultation (2019).

The objective of the Assessment was to identify any aspects of the Options that might be screened in for Appropriate Assessment (AA) and may lead to adverse effects on the integrity of Natura 2000 sites.

5. Elmbridge Local Plan: Options Consultation (2019)

The consultation took place between 19 August and 30 September 2019.

In their response, under each Option, NE stated that for residential dwellings within 5km of the SPA, mitigation in the form of SANG and SAMM would be required. The potential impact on the SPA and other habitats was also highlighted under each Option on the basis of the location of the relevant sites.

In addition, their responses stated their agreement with the conclusions of the HRA (2019) and would welcome discussions and a consultation on future HRA and SEA documents as the Plan progressed and it is likely that a full Appropriate Assessment (AA) will be required at a later stage.

6. Local Plan Evidence Base Preparation (2019)

• Infrastructure Delivery Plan (IDP) 2019

The council updated and published the IDP in August 2019. In updating the IDP, the council asked infrastructure providers to consider the impact of delivering 623 every year during the plan period and sought comments on the document between 14 November and 16 December 2019.

On 16 December 2019, the Environment Agency provided comments relating to the Strategic Matter of SANG and biodiversity and points for the council to consider. Their response stated that:

“We support and promote policies set out in the NPPF, which contribute towards conserving and enhancing the natural environment. We also support the Government’s 25 year Environment Plan which seeks to achieve an environmental net gain principle for development, including housing and infrastructure. All of the options should fully consider the content the NPPF in relation to biodiversity and net gain. The Government’s 25 Year Environment Plan should also be considered”.

7. Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

The consultation took place between 27 January and 9 March 2020.

In response to the consultation, no comments were received that related to the Thames Basin Heaths SPA.

8. Local Plan Evidence Base Preparation (2020 – 2022)

Building on its earlier evidence base preparation, the council undertook the following activities in support of the preparation of the draft Local Plan.

• SANGs Option Assessment (2022)

Through on-going monitoring of SANG and the Habitats Regulation Assessment of the Regulation 18 Local Plan Options Consultation (2019), the council was aware that between 14.69 and 118.33 hectares of additional SANG capacity would be required to mitigate the delivery of new development at varying scales / distributions.

Looking to provide additional SANG capacity, the council has looked at several options and discussed these with NE. Regarding the duty to cooperate, this has included:

- Exploring with neighbouring authorities as to whether they have spare SANG capacity, and
- Looking at providing additional SANG on a site(s) within public / private ownership in Elmbridge Borough.

The council has worked closely with NE on the consideration of options. Key activities with NE have included:

- 16 July 2020 – email discussion with NE regarding the progress made on the emerging Local Plan and evidence base. The focus was on the council re-checking its SANG baseline and seeking clarification from NE on several points. NE provided a response to all queries allowing the council to progress.
- 30 October 2020 – email to NE requesting a meeting to discuss progress at looking at SANG options and the input required from NE. An update on work undertaken (establishing the baseline) and an initial list of SANG sites being considered was provided. The council also sought clarification on whether SANG need to be located within 5km of the SPA.
- 11 December 2020 – email response from NE received. This provided some initial thoughts on the list of SANG sites being considered and a response to query raised.
- 11 January 2021 – meeting with NE to discuss the proposed assessment of SANG options. This was also attended by AECOM the consultants appointed to prepare the HRA & Appropriate Assessment for the Local Plan. NE generally agreed with the approach, provided an update with the work it was undertaking with neighbouring authorities, and provided a steer in terms of the latest templates to use for the assessment work.
- 12 January 2021 – email from NE following previous meeting. Provided clarification regarding the need to identify SANG across the plan-period and the level of certainty required as to where this will be.
- 10 March 2021 – meeting with NE to discuss emerging findings from the assessment of options for SANG. Email dated 11 March 2021 following-up points discussed and seeking written confirmation.
- 9 August 2021 – meeting with NE to discuss emerging findings from the assessment of options for SANG. It was noted that if the council were to look at its own sites and extending onto land covered by other habitats, site visits from NE would be required as well as visitor and habitat / species surveys. NE suggested a call for sites (SANG) be undertaken.
- 20 September 2021 – joint visits between the council and NE to several sites in the borough looking at potential options for additional SANG.
- 5 October 2021 – NE provided written comments on the sites visited on 20 September 2021 identifying those areas likely to be acceptable and additional work required to continue to consider other remaining options.
- 17 December 2021 – email from the council requesting a meeting following the emerging preferred option for a SANG site no longer being available.
- 5 January 2022 – email from NE in response to the council's previous email requesting a meeting. The email set out initial thoughts on options remaining and reiterated comments previously made.
- 12 January 2022 – meeting with NE to discuss assessment of Oxshott Common as

a potential SANG site. Guidance provided as to the surveys required and the times

Given the positioning of the Thames Basin Heaths SPA within Elmbridge Borough and catchment areas that surround SANG, the council has also co-operated with neighbouring boroughs to explore opportunities for other LPAs to mitigate the impact of future development in Elmbridge Borough. Those LPAs engaged are those where the provision of SANG within their borough would be located within an area capable of providing mitigation in Elmbridge e.g. the mitigation buffers would extend into Elmbridge where development is proposed.

Through duty to cooperate discussions with RBC, it was previously noted that they may have additional SANG capacity within their borough. The council therefore contacted RBC on 1 March 2021, to enquire if this was the case. In their response dated 2 March 2021, RBC confirmed that:

- the Franklands Drive SANG is a private SANG for that development and does not have any spare capacity that could be shared.
- the remaining capacity at Chertsey Meads is required for a combination of prior approval applications and two Local Plan allocations (Vet Labs & Pycroft Road).

In addition, it was confirmed that the Runnymede Local Plan had not identified sufficient SANG to deliver the housing target and thus they would also be seeking additional capacity as part of their immediate review of their Local Plan.

Following discussions with NE, the council was informed that in regard to Woking Borough, that they did not have any additional SANG capacity and were in a position of granting planning permission with Grampian Conditions whereby developments can only commence once SANG provision has been secured. NE informed the council that they had been working with WBC to identify new SANG.

Nevertheless, the council contacted WBC on 1 March 2021 to enquire whether they had any spare SANG capacity. On 5 March 2021, WBC confirmed that their emerging Site Allocations Development Plan Document identified sufficient SANG to meet their development need over the plan period but that there was no surplus capacity to meet any need arising from Elmbridge.

In regard to Guildford Borough, they have identified within their Infrastructure Delivery Plan (IDP) (2017) a number of options for bringing forward SANG to mitigate the impact of development within their borough. These areas are not however allocated within the Local Plan as SANG could suitably be provided in alternative locations to those set out. From discussions with NE it was understood that they were working with GBC and other parties to bring forward SANG options.

GBC was therefore also contacted on 1 March 2021. Their response dated 2 March 2021 confirmed that the position regarding Effingham Common SANG which, is within sufficient proximity to potentially mitigate development within Elmbridge Borough, has not moved forward. GBC confirmed that they would like to deliver a car park which would expand the current area of mitigation beyond 400m however, they were currently no realistic candidate site(s). If a car park was provided, officers from GBC stated that they did not see an in-principle issue with the idea of sharing capacity at Effingham Common (or other SANGs) with other boroughs. However, this would need to be agreed by the Council through its formal decision-making process.

In July 2021, the council asked GBC whether there had been any progress in

identifying a site for a carpark and whether they had considered using a Compulsory Purchase Order (CPO). It was confirmed that no further progress had been made. On 3 November 2021, the council followed up with GBC again. Their response was that no further progress had been made.

- **Avoidance & Mitigation Strategy (2022)**

The council has worked closely with NE to ensure the quantum and distribution of growth identified in the draft Local Plan is deliverable, demonstrating there is sufficient (additional) SANG across the borough (as set out in the Avoidance & Mitigation Strategy 2022).

Informing the Strategy has been the series of meetings and email exchanges with NE (as set out above).

- **Habitats Regulations Assessment of the Elmbridge Local Plan (Regulation 19) (2022)**

Produced by AECOM, the Assessment utilised information objected from several sources included on-going engagement of NE and neighbouring boroughs. It also considered future development proposed (and, where available, HRAs) for the adjoining authorities of Spelthorne, Richmond upon Thames, Kingston upon Thames, Mole Valley, Guildford, Woking and Runnymede.

The Assessment highlights the need to continue to liaise with NE to ensure the suitability of any proposed SANG solutions.

- **Infrastructure Delivery Plan (IDP) 2022**

In support of the draft Local Plan, the council has prepared an updated IDP to reflect the level of development, including locations and timings, as set out in the council's preferred spatial strategy and the additional infrastructure required to accommodate / mitigate this. The council engaged infrastructure providers in August / September 2021.

In regard to open space and recreation, Natural England stated the need to ensure sufficient SANG capacity is identified and provided general advice as to the need to consider the potential impacts and opportunities in relation to environmental conservation, protection and enhancement, including provision of green infrastructure (GI) and net gain.

9. Other Engagement Activities

The River Thames Scheme

As set out in Section 5 of this Statement, the River Thames Scheme is promoted by the EA and seeks to reduce flood risk to people living and working near the Thames, enhance the resilience of nationally important infrastructure, contribute to a vibrant local economy and maximise the social and environmental value of the river.

The scheme involves the building of a new flood channel alongside the River Thames to reduce flood risk to 15,000 properties and 2,400 businesses in communities along the river including Weybridge, Molesey, and Thames Ditton. The channel will be built in 3 sections including the widening of the Desborough Cut (Elmbridge Borough) and increasing the capacity of the weir at Molesey (amongst others) by installing additional weir gates. Other benefits of the scheme include the increased resilience of the road, rail,

power and water networks as well as the creation of 106 hectares of new public open space and 23 km of new pathways. Biodiversity for wildlife will also improve through the creation of 250 hectares of new habitat.

In response to flooding, flood risk and the RTS a number of groups have been set up. The main groups are the Lower Thames Planning Officers Group, the Programme Board and a Consents & Authorisations Project Board. These groups comprise officers from the local authorities of Elmbridge, Kingston, Richmond, Runnymede, Spelthorne, Windsor & Maidenhead as well as Surrey County Council. In addition to the Environment Agency, the scheme is also being delivered in partnership with the Thames Valley Berkshire and Enterprise M3 LEAs, Thames Water, Thames Regional Flood and Coastal Committee (RFCC) and the Department for Environment Food and Rural Affairs (Defra).

The Programme Board has recently considered the preferred mechanism to gain planning consent for all aspects of the scheme and how local authorities across the Lower Thames can consistently reflect the RTS in their Local Plans. A Service Level Agreement (SLA) has been agreed detailing joint working.

Through the preparation of the draft Local Plan the council has ensured the safeguarding of Desborough Island and reflected where relevant the ambitions of the Scheme within its emerging policies.

District Level Licensing

The council has been working with Natural England to establish a District Level Licensing (DLL) scheme in Elmbridge Borough.

Natural England has collated Great Crested Newt (GCN) data from local records centres to include in the modelling and produced risk zone maps. These indicate locations where suitable habitat for GCN is likely or unlikely to be present, categorised into three zones. Natural England is working to identify the number of ponds required and to identify options for ponds to be created / restored.

Category	Details
Summary of outcomes from strategic working:	<ol style="list-style-type: none"> 1. The preparation of a credible and robust evidence base on the potential impacts of development on the Thames Basin Heaths SPA and other important SPA / Ramsar sites. 2. Continued conservation and enhancement of the borough's biodiversity value, contributing towards a national network of wild-life rich places to restore nature. 3. Continued designation of SANG at Esher Commons & Brooklands. 4. Thorough assessment of options for the identification of SANG capacity to support the implementation of the draft Local Plan. 5. Identification of Oxshott Common as a potential option to provide future SANG with a programme of work and timetable in place.

<p>Links to the draft Local Plan:</p>	<ul style="list-style-type: none"> • The Vision – Elmbridge 2037 • Principle 1 – Tackling Climate Change • Principle 2 – Protecting and enhancing the quality of the environment • Principle 5 – Providing infrastructure and connectivity • Policy SS1 – Responding to the climate emergency • Policy CC5 – Managing flood risk • Policy ENV1 – Green and blue infrastructure • Policy ENV2 – Landscape, trees and woodlands • Policy ENV3 – Local Green Spaces • Policy ENV5 – Thames Basin Heaths Special Protection Area • Policy ENV6 – Protecting, enhancing and recovering biodiversity • Policy ENV7 – Environmental quality • Policy INF1 – Infrastructure delivery • Policy INF6 – Rivers
<p>On-going cooperation:</p>	<ol style="list-style-type: none"> 1. The council continues to work with NE to assess the suitability of Oxshott Common as a potential SANG with a programme of work and timetable in place. 2. Work continues with NE to establish a DLL scheme for the borough. 3. Continued monitoring of SANG capacity through the development management process alongside the collection of SAMM. 4. Continued joint working ensuring the sharing of best practice through membership of the JSPB. 5. Continued working with Strategic Partners to deliver the River Thames Scheme including the delivery of Desborough Island as a biodiversity habitat. 6. Statements of Common Ground (SoCGs) or updated SOCGs will be sought with each HMA Partner, neighbouring authorities and other Strategic Partners to cover all relevant Strategic Matters including the Natural Environment and Thames Basin Heaths SPA.

Strategic Priority D) Conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure, and planning measures to address climate change mitigation and adaption

Strategic Matter 12: Climate Change

Category	Details
Strategic Planning Issue:	Supporting the transition to a low carbon future and taking a proactive approach to mitigating and adapting to climate change.
Strategic Partners:	Climate change is specified as one of the strategic matters that may need to be subject to the duty to cooperate, but it is also the case that climate change is a global rather than local issue, and it is therefore difficult to define a limit to where the duty-to-cooperate should end. Therefore, as a practical solution, the council has linked this strategic matter to and co-operated with those authorities and organisations which seek to address the causes of, and seek to mitigate and adapt to, the effects of climate change.
Key Evidence Base:	<ul style="list-style-type: none"> • Air Quality Action Plan 2021 – 2026 • Air Quality Assessment Phase 1 - 2019 • Air Quality Assessment Phase 2 – 2021 • Strategic Flood Risk Assessment (SFRA) 2019 & Addendum 2022 • Viability Assessment (2022) • Transport Assessment (2022) • SA/SEA • Surrey’s 2050 Place Ambition

This section is set out as follows:

- 1. Elmbridge Local Plan - Local Plan: Strategic Options Consultation (2016/17)**
- 2. Local Plan Evidence Base Preparation (2018 - 2019)**
- 3. Elmbridge Local Plan - Local Plan: Options Consultation (2019)**
- 4. Elmbridge Local Plan - Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)**
- 5. Local Plan Evidence Base Preparation (2020 – 2022)**
- 6. Other Engagement Activities**

Actions:

To inform its draft Local Plan policies including the consideration of the spatial strategy for the borough and the allocation of sites, the council has undertaken a series of activities including, engagement at the Regulation 18 consultation stages and in the preparation of

the council's evidence base.

Tackling climate change is at the centre of the council's draft Local Plan. As set out in this Compliance Statement, there are several Strategic Matters that demonstrate the council has sought to work with Strategic Partners to address the causes / consequences of climate change. For example, promoting a modal shift in transport options away from the private vehicle (Strategic Matter 4), ensuring development is directed away from areas liable to flood (Strategic Matter 5) and promoting the provision and enhancement of Green & Blue Infrastructure (Strategic Matter 9).

As tackling climate change is a cross-cutting theme that is influenced and affected by other Strategic Matters, the council has not repeated those activities relevant to Climate Change in this section from Strategic Matters 4, 5 and 9. Rather, it has focused on those 'additional' key activities not previously covered.

1. Elmbridge Local Plan: Strategic Options Consultation (2016/17)

The consultation took place between 16 December 2016 and 24 February 2017.

The council received comments from Surrey County Council, the Environment Agency, Historic England and Natural England regarding the Strategic Matter of Climate Change.

- Surrey County Council – identified air quality and the potential impact of air pollution to be a consideration when assessing and allocating sites for development. The response also noted the need for new homes to be designed with energy efficiency in mind and the latest standards.
- The Environment Agency – welcomed the proposed replacement of Policy CS26 of the Core Strategy Flooding, to reflect the updated evidence base for flood risk. However, noted there was no reference to the updated climate change allowances that changed in February 2016 within this section. It was stated that this needs to be included as part of the new flood risk policy.
- Historic England – sets out relevant section of the NPPF insofar as climate change and how the council will need to consider these points when assessing sites for future development / allocation.
- Natural England – stated that the Local Plan should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change.

2. Local Plan Evidence Base Preparation (2018 – 2019)

Air Quality Assessment 2019

In support of the draft Local Plan, Cambridge Environmental Research Consultants (CERC) have prepared two Air Quality Assessments (2019 & 2022).

The 2019 Assessment (Phase 1) produced air dispersion modelling to identify the baseline air quality profile across the area and to assess two future (2035) scenarios, with and without proposed developments in the Elmbridge Local Plan in place. In regard to 'with proposed development', Option 3 from the 2019 Consultation (urban optimisation and large-scale Green Belt release).

The aim of the modelling was to ascertain whether or not the development associated with

the Local Plan has the potential to cause air quality issues, i.e. approaching or exceeding air quality standards for nitrogen oxides (NO_x and NO₂) or particulate matter (PM₁₀ and PM_{2.5}) and the impacts on human health and habitats.

Road traffic emissions input to the dispersion model were calculated from traffic flows provided from the Surrey Traffic Model (which take account of growth from neighbouring authorities), supplemented by Department for Transport (DfT) count data. The Emission Factor Toolkit version 8.0.1, published by Defra, was used to calculate emissions from traffic flows. All other emissions data were taken from the National Atmospheric Emissions Inventory (NAEI) 2015.

Surrey County Council also provided AM peak, PM peak and inter-peak traffic flows and speeds, by vehicle type, from the Surrey Traffic Model for major roads across Elmbridge. The AM and PM peak flows were used to derive Annual Average Daily Traffic (AADTs) using conversion factors provided by Surrey County Council.

Strategic Flood Risk Assessment 2019

The council commissioned consultants (AECOM) to produce the Strategic Flood Risk Assessment (SFRA). Prior to commencing the Assessment, the council approached neighbouring authorities to see if a joint assessment could be undertaken.

Unfortunately, due to the differing stages that each local authority was at with their Local Plan preparation this was not possible. Nevertheless, neighbouring authorities were consulted during the preparation of the Assessment. This included providing data and information on development schemes proposed in their respective areas which may impact on water courses included within the Elmbridge SFRA area.

In producing the Assessment, the Environment Agency were engaged throughout the process and the council agreed a cost-recovery framework to ensure they were able to input effectively into the Assessment including providing the required data and information and providing comments on the draft Assessment. The Environment Agency also attended a number of joint meetings with the council and AECOM.

SCC as the LLFA and Thames Water were also involved in the process, and were engaged in the draft methodology and draft report.

The assessment utilised the latest climate change allowances available as requested by the Environment Agency in response to the Local Plan: Strategic Options Consultation and raised in our joint working.

3. Elmbridge Local Plan: Options Consultation (2019)

The consultation took place between 19 August and 30 September 2019.

Regarding the Strategic Matter of Climate Change, the council received comments from Surrey County Council, Natural England and the Environment Agency.

- Surrey County Council – it was noted that the document states that some options will increase pressure on highways, particularly at peak times. The county council stated they would therefore want to see the impact of development proposals on air quality quantified, whilst also including mitigation to help prevent poor air quality.

- Natural England – stated that the Local Plan should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change.

Regarding air pollution it was stated that Natural England would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable.

Natural England advised that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment. Local Air Quality modelling was identified as being required.

- Environment Agency – stated that consideration must be given to climate change allowances when looking at site viability for allocations.

4. Elmbridge Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

The consultation took place between 27 January and 9 March 2020.

Regarding the Strategic Matter of Climate Change, responses were received from Surrey County Council and the Environment Agency.

- Surrey County Council – stated that the incorporation of minimum parking standards appears to be contrary to the statutory duty to include policies in the Local Plan that are designed to tackle climate change and its impacts, referred to in the section on Responding to climate change.
- Environment Agency - welcomed the inclusion of the commitment to tackle climate change and its impacts. Specifically, the Adaptation Actions listed in page 16 of the consultation document. The need to consider the most up to date flood mapping including climate change allowances was also highlighted.

5. Local Plan Evidence Base Preparation (2020 – 2022)

Viability Assessment 2022

As part of the Viability Assessment, the appointed consultants (DSP) included a 5% addition above base cost considering the likely update to building regulations following the Government's Future Homes Standard Consultation.

When establishing the assumptions to go into the viability modelling and testing, the consultants on behalf of the council, engaged with neighbouring authorities and representatives of the development industry. Engagement was undertaken in May – July 2020 and consisted of survey being distributed via email.

The council received limited response from local authorities, mostly setting out their

current positions and approaches as opposed to commenting on the council's intended approach and the assumptions being made.

A similar stakeholder consultation with the development industry was undertaken in January – February 2022, this invited stakeholders to provide observations on their most recent experiences of the latest market context generally (particularly given the continuing economic influences of the Covid-19 pandemic and Brexit) alongside continuing to raise awareness of the assessment in advance of the Regulation 19 representation stage.

Strategic Flood Risk Assessment Addendum 2022

In response to the comments made by the Environment Agency during previous engagement activities, the council sought to review the SFRA to ascertain whether an update was required. It was discussed in a series of emails with the Environment Agency in July 2021, that the council would consider the updated information (in particular that relating to Climate Change allowances) and discuss with the Environment Agency how to move forwards.

Having reviewed the data, the council produced an Addendum to outline the implications of the changes in data and set out why it considered an update was not required.

The Environment Agency were provided with a copy of the Addendum on 8 October 2021 and asked to provide comments by 1 November 2021. The process of engaging the Environment Agency on the Addendum is outlined under Strategic Matter 5: Flooding.

Transport Assessment 2022

The council appointed WSP to prepare a Transport Assessment in support of the draft Local Plan.

In addition to modelling the level of growth set out in the draft Local Plan, the Assessment also considered base line / planned growth arising from neighbouring boroughs and districts within a set distance. The outputs from the assessment were used to generate air quality data which was used by CERC to update the Air Quality Assessment 2022.

The Transport Assessment was scoped out and agreed with Transport for London, Surrey County Council and National Highways.

Air Quality Assessment 2022

This is the second part of the assessment, in which levels of NO₂, PM₁₀ and PM_{2.5} in the scheme area have been assessed for three future (2037) scenarios: Scenario 1, the future baseline; Scenario 2, the Urban Growth Strategy scenario; and Scenario 3, Urban Growth Strategy scenario with mitigation. Scenario 1 will be used as the 'do nothing' scenario against which Scenario 2 and Scenario 3 will be assessed.

Air quality modelling was carried out using ADMS-Urban software to determine concentrations of each modelled pollutant. The model set-up and emissions data, including traffic data and traffic emission factors relevant to modelling air quality, were updated to 2037. Emissions from other roads and sources across Surrey were updated to 2037. All other emissions and model inputs were the same as for the current baseline (2017) modelling.

The modelling used transport activity data provided by Elmbridge Borough Council,

together with emission factors from the EFT (Emission Factor Toolkit) version 10.1, published by Defra and the CREAM (Calculator for Road Emissions of Ammonia), published by Air Quality Consultants. Emissions from traffic flows across Surrey, used as input into the current baseline (2017) modelling, were projected to 2037 and modelled as part of the aggregated grid source. Emissions data from other sources were taken from the National Atmospheric Emissions Inventory (NAEI). Additional emissions from planned developments were included for Scenario 2 and Scenario 3.

6. Other Engagement Activities

Air Quality Action Plan 2021 – 2026

The council has produced an Air Quality Action Plan (AQAP) as part of its statutory duties required by the Local Air Quality Management framework. It outlines the action the council will take to improve air quality in Elmbridge between 2021 and 2026.

As well as providing actions to combat poor air quality, the AQAP provides useful baseline and contextual data and information as to the key causes and key areas. This has helped shape and inform the Local Plan both in terms of its overall strategic policies, development management policies and the allocations of sites.

In developing the AQAP, the council has worked with other local authorities, agencies, businesses, and the local community to improve local air quality. For example, the council established an Air Quality Action Plan Steering Group in August 2020 with the purpose of overseeing the formulation of the Plan by identifying new policies or actions that could positively affect air quality, as well as assisting with the implementation of the AQAP.

The Steering Group included the following stakeholders:

- Guildford Borough Council
- Mole Valley District Council
- Reigate and Banstead Borough Council
- Runnymede Borough Council
- Spelthorne Borough Council
- Surrey Air Alliance (SAA) representatives
- Surrey County Council – Public Health Team
- Surrey County Council Highways
- Surrey Heath Borough Council
- Waverley Borough Council
- Woking Borough Council

Two Steering Group Workshops were held in August 2020 to review and assess the viability of AQAP measures.

Schedule 11 of the Environment Act 1995 requires local authorities to consult with the Secretary of State; the Environment Agency; the highways authority; neighbouring local authorities; other public authorities as appropriate e.g. SCC Public Health Team; and bodies representing local business interests and other organisations as appropriate. Consultation on the AQAP took place prior to finalising the Plan.

Surrey 2050 Place Ambition

Central to the Place Ambition is the delivery of 'good growth', which includes building resilience to the impacts of climate change and flooding.

The Place Ambition has been developed by the Surrey Future partnership and is informed by and will be implemented through various local and countywide plans and strategies including district and borough local plans, climate change strategies, economic strategies, and the local transport plan. It does not replace any local proposals and priorities but is intended to promote a long term, co-ordinated and cross boundary approach to planning and managing the impacts of growth. The Place Ambition will be used to help shape projects we are working on together as well as to seek the support of our wider sub-national partners and Government, particularly in relation to accessing additional funding and investment opportunities for infrastructure and to support a zero-carbon future.

Surrey's Climate Change Strategy (2020) & Climate Change Delivery Plan (2021)

The shared ambition of Surrey's 12 local authorities (boroughs, districts and the County Council) is that our residents live in clean, safe and green communities, where people and organisations embrace their environmental responsibilities. In support of this ambition – the County Council has published a Climate Change Strategy that sets out our collective commitment to do our part to tackle climate change.

A key component of the Strategy is that it establishes the approach for how Surrey's local authorities and other partners will work together to put the county on the path of achieving net zero carbon emissions by 2050. The Strategy reflects that our success lies in us all taking action to shift our behaviour and to live more sustainable lives to help safeguard our communities and the environment.

The strategy was developed through engaging with academic partners, residents, businesses, schools and emergency services through workshops, focus groups, resident panels, and commissioning groups. It contains:

- 8 themed chapters
- 19 targets
- 164 actions

The actions are a mixture of those to be implemented by the County Council, authority organisations and our business and communities.

The council has worked in partnership to prepare the Strategy and has endorsed the strategic ambitions and priorities. Therefore, where relevant, the council has sought to reflect the overarching aims, targets and actions in the draft Local Plan.

After the publication of the Surrey Climate Change Strategy in April 2020, Surrey County Council published a 5-year Climate Change Delivery Plan (November 2021).

The Delivery Plan is the first phase of a 30-year plan to realise the ambitions set out in Surrey's Climate Change Strategy.

The Delivery Plan includes 'Local Authority Priorities by 2025' that the council has reelected in its draft Local Plan. For example, planning authorities and developers ensuring that everything built is fit for a low carbon future, by designing net-zero developments which are adaptable to the impacts of climate change, and achieving biodiversity net-gain.

Surrey Climate Change Risk & Opportunity Assessment and Adaptation Planning Study

Building on the Surrey Climate Change Strategy (2020) the County Council has commissioned a Climate Change Risk Assessment and Adaptation Planning Study.

Working with JBA Consulting, the first part of the Plan is the preparation of the evidence base, analysing the relevant climate projections to identify the key risks for Surrey. The second part is developing a full Risk Assessment and Adaptation Plan recognising that climate change can present opportunities as well as challenges, and also looking more widely at the adaptation planning stage to consider mitigation measures that help contribute towards reducing carbon emissions and moving towards the Net Zero target as well as enhancing resilience.

The final outputs will be focused on the specific climate change impacts for Surrey's key sectors (business, health and wellbeing, building and infrastructure, agriculture, and the natural environment), prioritise risks and opportunities and develop a sectoral adaptation plan that helps Surrey achieve its 2050 ambition of Good Growth.

The council is working closely with County colleagues, the appointed consultants, Surrey boroughs and districts, and other Strategic Partners e.g. the M3 LEP, to feed into the Plan. This has been via officers from Planning and Environmental Services (Carbon Reduction & Sustainability Officer).

Once finalised, the Plan will be used to inform the detailed guidance relating to its sustainability / climate change resilience, mitigation and adaptation policies as set out in the proposed Climate Change & Renewables Supplementary Planning Document (SPD).

Surrey Renewables and Estates Study

Again, building on the Surrey Climate Change Strategy (2020) the County Council has commissioned a Renewable and Estates Study.

Appointing Buro Happold and working via the Surrey Energy and Sustainability Partnership, the Study aims to identify opportunities across the County to provide renewable energy technologies e.g. solar and / or windfarms, across the County on publicly owned land.

To date, the council has been involved in the Partnership through our Carbon Reduction & Sustainability Officer, with the council providing GIS data and other information as to land within our ownership; constraints to the location of renewable energy e.g. SSSIs, Flood Zones; and also, potential allocation sites for which there would be competing land uses if identified as suitable.

The outputs and data remain unpublished however, the council aims to utilise the outcomes of the Study and work in partnership to deliver more sustainable forms of energy generation to support our existing and expanding communities.

Category	Details
Summary of outcomes from strategic working:	<ol style="list-style-type: none"> 1. An understanding of the wider plans and strategies that needed to be taken into consideration when preparing the draft Plan. 2. A robust and credible evidence base which establishes the key causes of reduced air quality and areas most likely to flood etc., and where development within the borough should be avoided / mitigated. 3. Strategic, development management and allocations policies drafted taking into consideration recommendations made by Strategic Partners and the outcomes of the evidence base prepared with key stakeholders.
Links to the draft Local Plan:	<ul style="list-style-type: none"> • The Vision – Elmbridge 2037 • Principle 1 – Tackling Climate Change • Principle 2 – Protecting and enhancing the quality of the environment • Policy SS1 – Responding to the climate change emergency • Policy SS2 – Sustainable place-making • Policy SS3 – Scale and location of growth • Policy CC1 – Energy efficiency, renewable and low carbon technology • Policy CCS2 – Minimising waste and promoting a circular economy • Policy CC3 – Sustainable design standards • Policy CC4 – Sustainable transport • Policy CC5 – Managing flood risk • Policy ENV1 – Green and blue infrastructure • Policy ENV7 – Environmental quality • Policy ENV8 – Air Quality
On-going cooperation:	<ol style="list-style-type: none"> 1. The council will continue to explore how connections in the Green & Blue Infrastructure network can be improved between authority areas. 2. The council is working with the County Council and other Surrey boroughs and districts and identified Stakeholders to update the Surrey Infrastructure Study in support of the Surrey 2050 Place Ambition. 3. Statements of Common Ground (SoCGs) or updated SOCGs will be sought with each HMA Partner, neighbouring authorities and other Strategic Partners to cover all relevant Strategic Matters including Climate Change.

Strategic Priority D) Conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure, and planning measures to address climate change mitigation and adaption

Strategic Matter 13: Historic Environment

Category	Details
Strategic Planning Issue:	Conservation and enhancement of the historic environment – Consideration of the impact of planned development on designated and non-designated heritage assets.
Strategic Partners:	<ul style="list-style-type: none"> • Environment Agency • Gardens Trust / Surrey Gardens Trust • Greater London Authority (GLA) • Guildford Borough Council (GBC) • Historic England (HE) • Local Nature Partnership / Surrey Wildlife Trust (SWT) • London Borough of Richmond (LBR) • Mole Valley District Council (MVDC) • Natural England • Royal Borough of Kingston upon Thames (LBK) • Runnymede Borough Council (RBC) • Spelthorne Borough Council (SBC) • Surrey County Council (SCC) • Thames Landscape Partnership • Woking Borough Council (WBC)
Key Evidence Base:	<ul style="list-style-type: none"> • Review of Absolute Constraints (2016, 2019, 2021) • Heritage Strategy (2015) • Landscape Sensitivity Study (2019) • Strategic Views Study (2019) • Heritage Impact Assessment (2022) • SA/SEA

This section is set out as follows:

- 1. Local Plan Evidence Base Preparation (2015 - 2016)**
- 2. Elmbridge Local Plan - Local Plan: Strategic Options Consultation (2016/17)**
- 3. Local Plan Evidence Base Preparation (2018 - 2019)**
- 4. Elmbridge Local Plan - Local Plan: Options Consultation (2019)**
- 5. Elmbridge Local Plan - Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)**
- 6. Local Plan Evidence Base Preparation (2021 – 2022)**
- 7. Other Engagement Activities**

Actions:

The above Strategic Partners have been engaged throughout the preparation of the new Elmbridge Local Plan including at the Regulation 18 consultation stages and in the preparation of the council's evidence base.

Key activities are as follows:

1. Local Plan Evidence Base Preparation (2015 – 2016)

• Review of Absolute Constraints (2016)

In 2016 the council published a document identifying the 'absolute constraints' to development within the borough.

In the Review document, our Registered Parks and Gardens (Claremont, Oatlands and Painshill) were identified as an 'absolute constraint' as they are fragile features and a finite resource that can easily be damage beyond repair.

As part of the preparation of the document, on 16 July 2015, the council consulted on a draft methodology.

Responses were received from:

- Environment Agency
- Epsom & Ewell Borough Council
- Greater London Authority
- Mole Valley District Council
- Natural England
- Runnymede Borough Council
- Spelthorne Borough Council
- Surrey County Council

On 14 August 2015, the council was contacted by Historic England stating that they had missed the consultation deadline and were comments still being accepted. The council responded on 17 August 2015, sending a copy of the responses received and how the council intended to address them. It was stated that if their comments had not already been addressed, then these could be provided. The council received no further response.

A summary of the comments received and how the council responded is set out in Appendix 6.

2. Elmbridge Local Plan: Strategic Options Consultation (2016/17)

The consultation took place between 16 December 2016 and 24 February 2017.

Only HE responded to the consultation raising points related to the Historic Environment. In their response, HE noted that options under consideration and set out that their concern that any heritage assets and the wider historic environment are fully considered in the selection and allocation of strategic sites.

For the three Key Strategic Areas set out in the consultation document, HE provided the relevant historic environment issues for each based on their initial assessment;

highlighting areas that needed to be protected / safeguarded.

HE also highlighted that a 'positive strategy in terms of the NPPF is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development including within their setting that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness'.

3. Local Plan Evidence Base Preparation (2018 – 2019)

To inform its draft Local Plan policies including the consideration of spatial strategy for the borough and the allocation of sites, the council prepared a series of evidence base documents.

Relating to the Historic Environment this included:

- **The Landscape Sensitivity Assessment (2019):**

Assesses the extent to which the character and quality of the landscape in the Borough is sensitive to change from the introduction of a development scenario, in this case large scale residential and mixed-use development. Included within the assessment was the consideration of the cultural and historic character of the area. In assessing this criterion, heritage designations (both statutory and local including Conservation Areas and Historic Parks) and Historic Landscape Characterisation (HLC) data was utilised.

In preparing the Assessment, the appointed consultants (ARUP) prepared a draft methodology for engagement. This was shared with Strategic Partners as part of duty to co-operate requirements, on 20 September 2018.

Responses were received from:

- MVDC (2 October 2018) - stating that they had no comments on the methodology which seems comprehensive and logical.
- RBC (27 September 2018) – stating that they had no comments to make at this time.
- SCC (1 October 2019) – stating that the source material looks comprehensive and the only additional source recommended to include being the Biodiversity Opportunity Areas (BOAs). A list of relevant BOAs to Elmbridge were provided.
- SWT (1 October 2019) – stating that GIS data should also include (under Ecology designations), non-statutory Local Sites (i.e. Sites of Nature Conservation Importance in Surrey) and BOA. Links were provided to where this information could be sourced.

The council subsequently provided additional GIS layers to the consultants and BOAs and other ecology designations were referred to in the Assessment where relevant.

- **The Strategic Views Study (2019)**

Linked to the above assessment, this Study looked at the existing Strategic Views designations contained within the Core Strategy 2011 and assessed whether there was

still the justification for its retention and of the seven views.

The methodology for the Study was combined with the Landscape Sensitivity Assessment methodology, which was shared with adjacent local authorities as part of duty to co-operate requirements, on 20 September 2018.

As set out above, those Strategic Partners that responded considered the methodology to be comprehensive and logical. No specific comments were received relating to the approach to the assessment of strategic views.

4. Elmbridge Local Plan: Options Consultation (2019)

The consultation took place between 19 August and 30 September 2019.

In response to the consultation, only HE and SCC made comments that related to the Historic Environment.

In their response, HE advised that they did not wish to express a formal opinion on the preferred option(s) for development set out in the consultation document, in view of the widespread and diverse nature of the sites and areas presented. HE went on to state that whichever option(s) is selected they must be robustly evidenced in relation to impacts on the historic environment, and that a comprehensive heritage assessment should be carried out as part of the exercise to determine the suitability of options and sites for housing development.

SCC stated that Policy DM12 Heritage of the Development Management Plan was still in accordance with the NPPF, but suggestions were made that the council's approach could be amended to ensure that opportunities for enhancement were identified.

5. Elmbridge Local Plan: Creating our vision, objectives and the direction for the Development Management Policies (2020)

The consultation took place between 27 January and 9 March 2020.

In response to the consultation, only HE made comments that related to the Historic Environment.

In their response, HE welcomed the inclusion of 'protecting and enhancing the borough's historic and cultural assets'. Opportunities for making more explicit reference to the historic environment with the vision and policies were highlighted.

6. Local Plan Evidence Base Preparation (2021 – 2022)

In response to the point made by HE at the Local Plan: Options Consultation Stage, the council prepared a:

- **Heritage Impact Assessment (2022)**

The purpose of the Assessment is to ensure that the council fulfils the requirements of implementing historic environment legislation, the relevant policies in the NPPF and Guidance, when preparing and seeking to implement the policies in the draft Local Plan. Importantly, it seeks to ensure that the historic environment plays a positive role in allocating sites for development.

Strategic Partners, as well as the Gardens Trust and Historic Royal Palaces, were engaged on a draft methodology on 5 August 2021. In addition, a list of sites to be assessed were provided.

Responses were received from:

- SCC (10 September 2021) – the county Historic Environment Record (HER) should be used as a source of information to complete the proformas as it contains detailed information about heritage assets and features / discoveries nearby that the other sources will not, which would add significant clarity to the assessment process regarding the heritage sensitivity of sites.
- Historic Royal Palaces (10 August 2021) – welcomed the council's consideration of the potential impact of development on the borough's heritage assets and agreed that the proposed methodology and the sources it references looked appropriate. Comments relating to specific sites were made and an Assessment relating to one particular site was provided.
- Surrey Gardens Trust (16 August 2021) – stated that the methodology looks to be commensurate with paragraphs 194 – 208 of the NPPF but, should not obviate the requirement for proportionate heritage documentation from applicants at the submission of planning applications. It was also stated that the HER should be added as a source of information. Reference to one particular site subject to a current planning application was also made.
- Historic England (6 September 2021) - welcomed the council's consideration of the potential impact of development on the borough's heritage assets. Highlighted the need to use the HER as part of the assessment and that these should be undertaken by a suitably, qualified person.

In response the council has appointed a suitably, qualified consultant to peer-review the Heritage Impact Assessment. This is the same consultant employed by SCC to update the Local List (see Other Engagement Activities below) for several Surrey boroughs and districts as part of the Government's Local List Heritage Campaign. In addition, the council and appointed consultant has utilised the HER to undertake the assessments.

7. Other Engagement Activities

Local List Update

As part of the Government's 'Build Back Better' initiative, the Ministry of Housing, Communities and Local Government (now the Department for Levelling Up, Housing and Communities) in association with Historic England provided funding to 22 areas to develop local heritage asset lists. Surrey is one of the areas to have received this funding.

Over the last year (2021 / 22) a Surrey County Council-based project team has been working with the council to update the local heritage assets list for the borough. The council is aiming to consult on the draft Local List Update in Autumn / Winter 2022.

Once adopted, the lists will be used to inform the planning process and guide future decisions around the use and custodianship of local heritage assets. The information captured as part of this project will also be added to the Surrey Historic Environment Record (HER) managed and maintained by Surrey County Council.

Category	Details
Summary of outcomes from strategic working:	<ol style="list-style-type: none"> 1. A robust and credible evidence base that sets out the heritage assets within the borough that need to be protected. 2. The evidence has been used to inform the selection of sites for allocation within the draft Local Plan and identify mitigation where appropriate. 3. Local Plan policies which seek to protect and enhance heritage assets.
Links to the draft Local Plan:	<ul style="list-style-type: none"> • The Vision – Elmbridge 2037 • Principle 2 – Protecting and enhancing the quality of the environment • Policy SS2 – Sustainable place-making • Policy SS3 – Scale and location of growth • Policy ENV9 – Urban design quality • Policy ENV10 – Heritage assets • Policy ENV11 – Strategic views • Policy EC04 – Promoting visitor attractions and arts and cultural venues
On-going cooperation:	<ol style="list-style-type: none"> 1. The council will continue to work with Historic England and other Strategic Partners to ensure that issues relating to the historic environment are addressed in the Local Plan and in future planning documents. This includes engagement on a Master Plan for large scale development e.g. Whiteley Village, and in the determination of planning applications. 2. The council will continue to work with the County Council and other Strategic Partners as part of the Government’s Local List Heritage Campaign, to update Elmbridge’s Local List and consider the potential implications for any proposed allocation /application in due course. 3. Where appropriate, the council will address the issue of the Historic Environment in the SoCGs to be drafted following the Regulation 19 Stage.

Other Strategic Priorities

Strategic Matter 14: Heathrow

Category	Details
Strategic Planning Issue:	Understand and influence the potential impact of airport expansion – minimise the potential harmful impacts and maximise the potential benefits of expansion through collaborative working
Strategic Partners:	<p>Membership of the Heathrow Strategic Partnership Group (HSPG):</p> <ul style="list-style-type: none"> • London Borough of Ealing • London Borough of Hounslow • Runnymede Borough Council • Slough Borough Council • Spelthorne Borough Council • Surrey County Council • Enterprise M3 LEP, • Thames Valley Berkshire LEP • Buckinghamshire Thames Valley LEP <p>Other organisations participate in many of the activities of various Working Groups with ‘Observer’ status, including:</p> <ul style="list-style-type: none"> • Buckinghamshire Council • Colne Valley Regional Park Community Interest Company (CIC). • Department for Transport (Aviation Team and others) • Environment Agency • Highways England • Independent Commission on Civil Aviation Noise • London Borough of Hillingdon • London Borough of Richmond upon Thames • Natural England • Public Health England • Royal Borough of Windsor and Maidenhead • Strategy Aviation Special Interest Group (of the Local Government Association) • Transport for London • West London Alliance (of West London Boroughs) • West London Businesses
Key Evidence Base:	<p>HSPG has published multiple evidence base documents in support of its on-going work with and response to Heathrow Airport Limited’s (HAL) plans for the future expansion of Heathrow Airport.</p> <p>Documents have been published under the following topic areas: business & economy; natural environment; public health; spatial planning; and transport.</p>

	Where relevant Elmbridge Borough Council has fed into the evidence base documents and formal consultation responses (as well as submitting its own).
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<p>Actions:</p> <p>Member of the Heathrow Strategic Planning Group</p> <p>Due to the unique scope of potential impacts from the proposed expansion of Heathrow, a partnership, the Heathrow Strategic Planning Group (HSPG) with host and adjacent authorities of the airport in the region was formed in 2015. The understanding of the Group was that collaborative working will lead to greater understanding and influence over the potential impact of airport expansion on the wider area and help authorities to minimise the potential harmful impacts and maximise the potential benefits of expansion through joint representation to Government, Heathrow Airport Limited and other key stakeholders.</p> <p>In 2018 Elmbridge Borough Council became a Full Member of the Group. Prior to this, the council was an ‘observer’ but still participated in many of the Group’s activities. This included feeding into the evidence base documents, providing base line information, borough / local plan context, and commenting of documentation.</p> <p>The council continues to be an active member of HSPG and attends meetings on a range of topics on a regular basis. This includes the two regular officer group meetings. A Chief Officers Group attended by Chief Executives or nominees to give strategic direction to support the Leaders Board (established in October 2017) which meets quarterly and a monthly Officers Group which essentially steers the work HSPG day to day. In addition, specialist sub-groups meet from time to time focusing on a range of technical aspects, including: Transport, Spatial Planning, Environment - Natural Environment, Environment - Public Health, and Business and Economy; these are attended by specialist lead technical officers from the council and other member groups.</p> <p>Key evidence base documents the council has fed into alongside its Strategic Partners are set out below:</p> <p>Joint Evidence Base & Infrastructure Study (JEBIS) (2018) (updated Report August 2019)</p> <p>The purpose of this work was to provide an evidence base for the Local Authorities around the airport (including Elmbridge) on the potential economic development, labour market and housing needs arising from the proposed expansion of the airport and how that relates to the background growth for which the authorities are already planning. It also assessed associated infrastructure requirements to support this level of development.</p> <p>Although this summary report provided some broad conclusions as to the types of issues and options facing the Authorities in developing planning policy – both strategic and local – it is not intended to suggest any particular conclusions. Instead the Authorities and other partners can use the evidence base to develop the approach in the context of their own priorities and wider strategic and national policy guidance.</p> <p>Joint Strategic Planning Framework (February 2020)</p> <p>The HSPG has produced a Joint Spatial Planning Framework (JSPF) for the sustainable development of the sub-region, to address the implications of both ‘baseline growth’ and</p>
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the additional growth demand forecast to result from the expansion of Heathrow Airport over the next 30 years.

The JSPF sets out four vision statements that set a strategic trajectory for the sub-region. Taken together, these statements form the vision of how the HSPG wish the sub-region to perform and be experienced in 2050. The statements are:

- A thriving and prosperous economy;
- Connectivity as an enabler of growth, innovation and inclusion;
- An attractive and suitable environment; and
- Livable neighbourhoods with a strong sense of place.

The JSPF was finalised immediately before a legal challenge to the Airports National Policy Statement (27 February 2020) and the rapidly unfolding impacts of the COVID-19 crisis. HSPG have therefore decided to publish the finalised documents as they stand and ‘to draw a line’ under this phase of the JSPF work, and then commence a new phase of work when the circumstances and way forward becomes clearer. This may require some significant changes to the content of the existing documents to respond to new forecasts, evidence, national policies and priorities.

The JSPF should therefore be read alongside the HSPG Position Statement and draft Statement of Common Ground (SoCG) - <http://www.heathrowstrategicplanninggroup.com/>

Economic Development Vision & Action Plan (March 2020)

In 2020 HSPG, supported by Arup, produced an Economic Development Vision and Action Plan (EDVAP) - an action-focused Plan to maximise the economic productivity, skills, jobs and business development in the HSPG area.

Given the impacts of the last year, a major programme to refresh this document is currently underway. A new position statement - Heathrow 360: Gateway to the UK has been produced - [Heathrow 360 - Gateway to UK](#).

HSPG Position Paper on Southern Access to Heathrow (October 2021)

The paper sets out how the Southern Access to Heathrow (SATH) scheme could be integrated with a holistic consideration of regeneration, housing, innovation, and economic development strategies across a wide arc to the south of the airport.

It is explained how SATH can be a platform for sustainable growth that allows this region to enhance its role as a major contributor to the long-term economic success of the nation – fully capitalizing on its unique assets and global relevance.

The sets out why it is the right time to deliver the SATH scheme.

Category	Details
Summary of outcomes from strategic working:	<ol style="list-style-type: none"> 1. Understanding and influence of the potential impact of airport expansion. 2. Publication of the JEBIS and JSPF establishing the potential opportunities and vision for the sub-region.
Links to the draft Local Plan:	There is no specific policy within the draft Local Plan that references Heathrow. As the borough sits on the very edge

	<p>of the sub-region potentially impacted by the expansion of Heathrow, many of the impacts / benefits are indirect. Nevertheless, the council has sought to reflect the statements (vision) from the JSPF and align this with its own vision and guiding principles.</p>
<p>On-going cooperation:</p>	<p>Given the current Covid 19 crisis, HSPG has refocused its objectives and priorities. A new Accord was agreed for HSPG in July 2020 and steers the work of the Group towards the recovery from the Covid-19 pandemic and economic downturn, to ensure local communities and businesses reliant on the airport can quickly get back on their feet, whilst ensuring a better environment is also created. The Accord also focuses on a 'green recovery'.</p> <p>Therefore, whilst the plans for the expansion of Heathrow Airport have yet to be confirmed it has not been possible for the draft Local Plan to fully address the potential implications. This will be reconsidered at the first review of the Local Plan when there should be a much greater degree of certainty.</p> <p>In the interim the council will continue to work within the HSPG to deliver the refocused objectives and priorities.</p>

7. Conclusion

7.1 This statement outlines the active and ongoing cooperation that has led up to and informed the preparation of the draft Local Plan (June 2022). This has included a range of activities, including:

- at the three Regulation 18 consultations;
- on evidence base documents including briefs and draft reports;
- at individual meetings with local authorities and other Strategic Partners;
- as an active member of groups covering a range of Strategic Planning Matters e.g. Surrey Futures (Surrey's 2050 Place Ambition), Housing Market Area (HMA) Partnership and Heathrow Strategic Planning Group (HSPG) meetings; and
- through correspondence and other communications

7.2 As set out in Section 1 of this Statement, cooperation will continue throughout the Regulation 19 stage up until the submission of Local Plan for Examination in Public (EiP) and, the council will prepare a Supplementary Statement that sets out activities undertaken between June 2022 and the submission of the draft Local Plan (expected Autumn 2022). This will also include updates on any new issues arising and issued resolved and will be supported by a series of Statements of Common Ground (SoCGs).

7.3 To date, this Statement sets out how the council has cooperated with prescribed bodies, neighbouring authorities and other organisations relevant to the duty to cooperate and the individual Strategic Matters. The Compliance Statement demonstrates that the council has complied with duty to cooperate requirements in Section 110 of the Localism Act, Section 33A of the Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework when preparing the draft Local Plan.