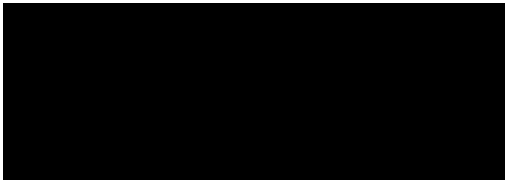


STATEMENT OF COMMON GROUND

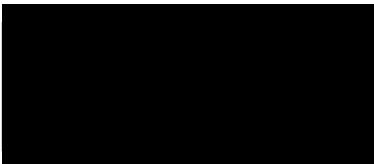
1. List of Parties involved:

- Elmbridge Borough Council (EBC)
- Runnymede Borough Council (RBC)

2. Signatories:



Elmbridge Borough Council
Kim Tagliarini, Head of Planning & Environmental Health



28.08.2023

Runnymede Borough Council
Georgina Pacey, Planning Policy and Climate Change Manager

3. Strategic Geography

The Statement of Common Ground (SoCG) is between the local authorities of Elmbridge Borough Council (EBC) and Runnymede Borough Council (RBC). This SoCG updates the SoCG signed 18 June 2018 which was prepared in support of Examination in Public (EiP) for the Runnymede 2030 Local Plan.

EBC and RBC share a common boundary within the Surrey County Council (SCC) administrative area (see Figure 1).

EBC and RBC lie within separate Housing Market Areas (HMAs). Elmbridge is located in the Kingston and North-East Surrey HMA alongside the Royal Borough of Kingston upon Thames, Epsom & Ewell Borough Council and Mole Valley District Council. Runnymede is located within a HMA alongside Spelthorne Borough Council.

Both EBC and RBC are in the Enterprise M3 Local Enterprise Partnership and are identified as part of the Outer London / North Surrey Functional Economic Market Area (FEMA).

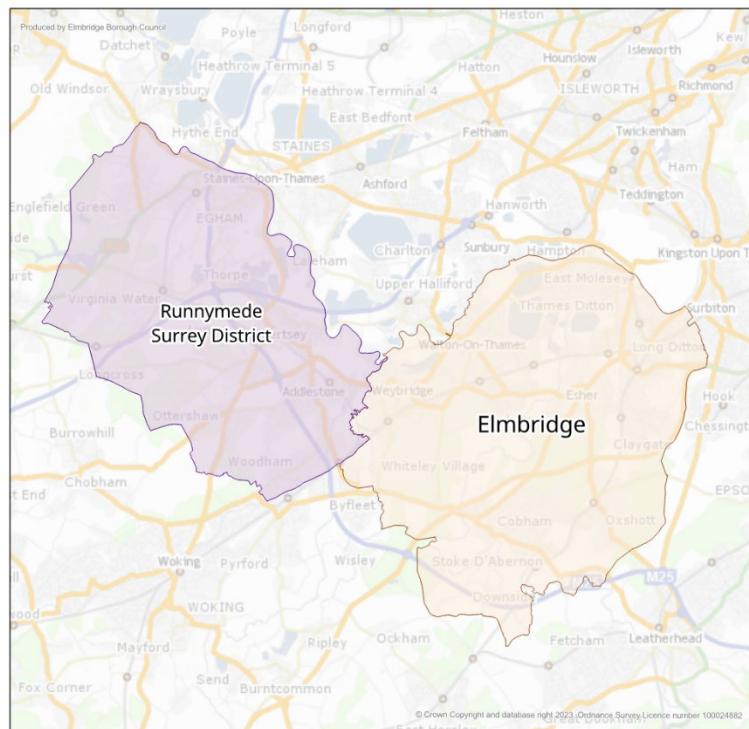


Figure 1: Elmbridge and Runnymede Boroughs

4. Strategic Matters

Duty to Cooperate

EBC and RBC have engaged with one another to discuss duty to cooperate matters throughout the preparation of their respective Local Plans. This has included engagement on their evidence base documents; through meetings; and at the Regulation 18 & 19 Stages.

Both parties agree that the duty to cooperate requirements have been met in respect of the draft Elmbridge Local Plan and the adopted Runnymede 2030 Plan. Their duty to cooperate activities are recorded in the following documents:

- RBC - Duty to Cooperate Scoping Framework (October 2015),
- RBC - Duty to Cooperate Update Statements (from July 2016, May 2017 and January 2018)
- RBC - Duty to Cooperate Review Document (September 2017)
- RBC - Duty to Cooperate Update and Compliance Statement (July 2018)
- EBC - Duty to Cooperate Statement of Compliance (June 2022)

Both authorities agree that the above documents are an accurate record of their engagement up until EBC's Regulation 19 consultation in June 2022.

Neither party has objected to each other's Local Plan for failing to comply with the duty. It is a duty that requires cooperation, not agreement, and the two authorities agree that

they have cooperated in an ongoing and effective manner as set out in their respective Statements of Compliance and associated updates, as well as this SoCG. RBC has however, expressed concern over how EBC has taken into account the comments made under the Duty to Cooperate in developing its spatial strategy and the weight given to the potential unmet housing need arising from within the Kingston & North Surrey HMA and from other neighbouring authorities.

Local Plan Positions

Elmbridge

EBC invited representations on their draft Local Plan (Regulation 19) between 17 June and 29 July 2022. It is the Council's intention to submit its draft Local Plan to the Secretary of State for Levelling-Up, Housing and Communities for independent examination in July 2023.

Runnymede

RBC adopted the 2030 Local Plan on the 16 July 2020.

A review of the Runnymede 2030 Local Plan commenced in January 2021 but was paused in September 2022 due to uncertainty at a national level on potential planning reforms.

At a meeting of the Council's Planning Committee on 28th June 2023, the pause to the Local Plan Review was reconsidered. Following a debate on the options available to the Council, it was agreed that:

1. The work on the next iteration of the Local Plan should be based around the option for preparing a Plan under the new plan-making arrangements that are due to be published by Central Government.
2. Once the Government had published its next iteration of the National Planning Policy Framework (NPPF), a new Local Development Scheme (LDS) be produced based around the option of preparing a Plan under the new plan-making arrangements, and brought back to the Planning Committee, prior to being taken to Full Council for final approval.
3. The Planning Committee would receive a further update on this, ideally at the October 2023 meeting of the Committee.

Elmbridge Local Plan – Regulation 19 Representation Period (June 2022) & Key Strategic Matters:

EBC invited representations on their draft Local Plan (Regulation 19) between 17 June and 29 July 2022. A break down of RBC's representation (dated 29 July 2022) including EBC's response to the points raised is set out in Appendix 1.

From RBC's representation to the draft Elmbridge Local Plan and through on-going discussions, Housing and the Green Belt have been identified as outstanding key strategic matters. The position of each authority in respect of their Local Plans is set out below:

Housing Need

Elmbridge

The local housing need figure, as set by the Government's Standard Method, is 9,705 (647 dwellings per annum) over 15-years.

Elmbridge's proposed growth strategy focuses on delivering development and increasing capacity in its existing urban areas (a 'brown-field' approach). This includes the reallocation and diversification of employment land, encouraging mixed use development and ensuring the potential of sites is optimised.

This approach provides for 6,785 dwellings, 70% of the local housing need figure. This leaves a local unmet housing need of circ. 2,920 dwellings over its plan period. This includes an element of unmet affordable housing need.

Runnymede

RBC's adopted Local Plan 2030, sets out that a minimum of 7,507 net dwellings will be provided across the plan-period in order to meet in full the objectively assessed housing need of the borough. Policies within the plan identify that this will be met through a combination of redeveloping sites in the urban areas, the release of sites from the Green Belt, and the development of Longcross Garden Village.

Green Belt

Elmbridge

EBC has commissioned Arup to undertake two Green Belt Assessments. The first, Green Belt Boundary Review (GBBR) was published in 2016 and examined the performance of the Green Belt in and around Elmbridge against the Green Belt Purposes, as set out in the National Planning Policy Framework (NPPF). The analysis was undertaken at two scales: Strategic Areas and Local Areas.

The 2018 Supplementary Review was a more spatially focused piece of work to better understand the performance of smaller 'sub-areas' against the Green Belt purposes, as well as their context in relation to the wider Green Belt (Local Areas and Strategic Areas, as assessed through the 2016 GBBR).

In addition to the above, the Council has also undertaken further evidence base work on the Green Belt:

- Green Belt Boundary Review – Assessment of Weakly Performing Local Areas 2019: The assessment identifies the extent of development potential within each Local Area considered to be 'weakly performing' as part of the GBBR 2016 and sets out whether there is an opportunity for large / small-scale development or no development.
- Green Belt Boundary Review – Accessibility Assessment, June 2019: This assessment looks at the sustainability of specific Green Belt areas (weakly performing and smaller sub-divisions) using a range of accessibility standards.
- Green Belt Boundary Review – Assessment of Previously Developed Land, June 2019: This assessment looks at the level of Previously Developed Land (PDL) within specific Green Belt areas (weakly performing and smaller sub-divisions).
- Green Belt Site Proforma – Utilising the information from the above documents and other evidence base documents, the pro-forma considers specific areas of land for potential release from the Green Belt.

The evidence base documents set out that alongside further assessments and evidence base documents, they will be used to inform the Council's preferred approach for the Local Plan and site selection. This includes whether exceptional circumstances exist to justify releasing land from the Green Belt.

EBC's rationale for its proposed development strategy is set out in the Topic Paper: How the Spatial Strategy was formed (June 2022). The Paper sets out the options assessed when considering how to address the Borough's housing need and includes the Council's consideration of whether exceptional circumstances are fully evidenced and justified to release land from the Green Belt. The Paper sets the rationale for the Council's recommended spatial strategy within the draft Local Plan; promoting sustainable development and place-making ambition and responding to the Council's commitment to tackle climate change.

Runnymede

As part of the evidence base for the Local Plan, RBC appointed Arup to review Green Belt boundaries in the borough. Two phases of review work were undertaken; the first

was a strategic level review (2014) looking at whether Green Belt within the borough still met its purposes and whether alterations to boundaries could be made. This was followed by a more finely grained assessment of land within defined buffers of the borough's urban settlements in 2017.

To complement the Arup review of the Green Belt, a further review was undertaken by RBC to consider whether villages lying in the Green Belt should continue to be 'washed over' (included) by the Green Belt or excluded and returned to the settlement. A Stage 1 review of Green Belt Villages considered which developed areas of Runnymede lying within the Green Belt could be considered as a 'village' and if so, whether they should remain in the Green Belt or be excluded and returned to settlement. Stage 2 of the process considered where a new detailed village/Green Belt boundary should be placed around the village of Thorpe in accordance with Green Belt policy as set out in the NPPF.

A Technical Review of the current Green Belt boundaries was also undertaken by the RBC. This review was undertaken to consider and, where appropriate, make any minor amendments required to make the Green Belt boundary more logical and/or defensible.

The outcome of these studies alongside the consideration of other technical evidence base document including, the consideration of Exceptional Circumstances, led RBC in their Local Plan 2030 to allocate a number of urban extensions to help meet identified development need. In addition, an area of land was removed from the Green Belt for the provision of a new settlement at the Longcross Garden Village. Thorpe was also inset from the Green Belt.

Current positions:

Elmbridge's draft Local Plan – Runnymede Borough Council's position

- RBC is fundamentally concerned that the housing strategy presented (particularly in policy SS3) fails the tests of soundness contained in the NPPF.
- RBC does not consider that the housing strategy is positively prepared, as it does not provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.
- RBC supports the approach of EBC to maximise the delivery of new homes in its Urban Area. However, RBC considers that there are other spatial strategy options which EBC has presented and discounted, but which perform well through the Sustainability Appraisal, and which would meet EBC's identified needs in full (or would be very close to meeting your needs in full).
- RBC notes that the EBC has produced a significant amount of evidence relating to how land in Elmbridge performs against Green Belt purposes.

- RBC notes that whilst disagreeing with the findings of its Green Belt evidence is a legitimate stance to take, there is concern with this overall position given the intensity of the housing needs in Elmbridge and its Wider Housing Market Area.
- RBC does not support the conclusions drawn by EBC in relation to the intensity of the Objectively Assessed Need in Elmbridge and the surrounding area (especially within its Housing Market Area), and how this has been weighed in the balance in determining whether Exceptional Circumstances exist to release Green Belt land in Elmbridge.
- RBC is of the opinion that a spatial strategy proposing the release of Green Belt land in Elmbridge to meet identified needs is justified.
- RBC is highly unlikely to be able to assist Elmbridge in terms of meeting its unmet housing needs.

Runnymede Local Plan – Elmbridge Borough Council's position

- EBC notes the stage of the Runnymede Local Plan Review and the decision to base their new Local Plan and its preparation on the new plan-making arrangements that are due to be published by Central Government.
- EBC will respond to RBC's consultations in due course.

The parties agree:

1. The proposed development strategy as set out in the EBC draft Local Plan will be investigated through the Examination-in-Public process and it will be for the Planning Inspector to determine whether it is sound.
2. Despite the difficulties of meeting local housing need, the two authorities will continue to discuss any significant development and changes in housing land supply and approach that could enable the issue of unmet housing to be resolved.

Matters not specifically addressed within this Statement of Common Ground

The parties agree:

The following matters are defined in the NPPF as Strategic Matters but are not specifically addressed in the context of this SoCG:

- Gypsies, Travellers, and Traveller Showpeople;
- Employment, retail and leisure;
- Transport;
- Flooding;
- Green & Blue Infrastructure;
- Natural Environment & Thames Basin Heaths Special Protection Area (TBHSPA);
- Climate Change;
- Historic Environment; and
- Heathrow.

The authorities agree that the engagement undertaken on these issues as set out in their respective Duty to Cooperate: Statement of Compliance documents is an accurate record and that there are no unresolved issues.

It is also agreed that the authorities will continue to work on these matters as appropriate.

5. Governance Arrangements

The authorities are committed to working positively together, sharing information and best practice, where appropriate, throughout the plan preparation phase and beyond. This co-operation and collaboration takes place at senior member, chief executive, and senior officer as well as at technical officer level.

Joint working will include the following existing governance arrangements:

- Surrey Leaders;
- Surrey Chief Executives;
- Surrey Futures;
- The Surrey Planning Officers' Association (SPOA);
- Surrey Planning Working Group (PWG); and
- Heathrow Strategic Planning Group (HSPG).

In terms of governance, the authorities agree:

- that in response to any new evidence / changes in circumstances, informal discussions will occur between the two authorities on the cross-boundary issues referred to in this SoCG in the form of officer level meetings with escalation of matters to Member level where necessary;
- that this SoCG will be reviewed at the above meetings or, when required by either authority e.g. for the purpose of their Examination.
- to continue to work collaboratively on plan preparation and evidence, whilst acknowledging others' timetables and timescales;
- to respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities where they would comply with national planning policy; and
- to continue to work with the other Surrey authorities on housing, employment and other strategic issues affecting Surrey as a whole.

Appendix 1: Runnymede Borough Council's Regulation 19 Representation to Elmbridge Borough Council's draft Local Plan - June 2022

Runnymede Borough Council's (RBC) Representation	Elmbridge Borough Council's (EBC) Response
<p>RBC notes that using 2022 as the base year for calculation, the housing need for Elmbridge equates to 647 dwellings per annum and over the plan period 9,705 homes. The Local Plan only commits to delivering a minimum of 6,785 net additional homes over the Plan period, or approximately 70% of the identified needs. A housing target of 452dpa is proposed. This target is 195 units short of the number of homes that would need to be provided in Elmbridge each year to meet identified housing needs in full (as determined by the Government's Standard Methodology).</p> <p>The Local Plan sets out in policy SS2 that the Council seeks to deliver homes for all, yet the plan fails to achieve this by leaving needs unmet, with EBC having no suggestions as to how these needs will be met by another Local Authority. This is acknowledged in para 3.30 which states that, <i>'it is clear that it is highly unlikely there will be any significant opportunities during the plan period to accommodate need outside of the borough boundary'</i>.</p> <p>RBC is fundamentally concerned that the housing strategy presented in your Regulation 19 Plan (particularly in policy SS3) fails the tests of soundness contained in the NPPF. Specifically, we do not consider that your housing strategy is positively prepared, as it does not provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs. From reviewing all of your consultation material and relevant parts of your evidence base, it is our belief that there are other spatial strategy options which you have presented and discounted, but which perform well through your Sustainability Appraisal, and which would meet your identified needs in full (or would be very close to meeting your needs in full).</p>	<p>Comments noted.</p> <p>Comments noted.</p> <p>Comments noted. The concerns raised by RBC in their Regulation 19 representation regarding EBC's housing strategy will be a matter for the planning inspector to consider at the Examination in Public.</p>
<p>RBC supports the approach of EBC to maximise the delivery of new homes in its Urban Area. However, as acknowledged by EBC, the strategy proposed will not meet identified needs in full over the Plan period.</p>	<p>Support and comments noted.</p>

Paragraph 125 of the NPPF is therefore considered relevant. This states that, 'Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies... avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:

- a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;
- b) the use of minimum density standards should also be considered for other parts of the plan area...'

It is noted that the allocations proposed in chapter 9 of the Local Plan are not expressed as minimum requirements, and in light of the expected unmet needs in Elmbridge, it is suggested that the capacity of the allocated sites are expressed as minimums in the hope that the delivery of sites in the Urban Area can be increased over the Plan period.

RBC notes that the Council has produced a significant amount of evidence relating to how land in Elmbridge performs against Green Belt purposes. The 2016 Green Belt Review identified 13 Local Areas which were identified as weakly performing in Green Belt terms. Three of these areas remained under consideration following an analysis of absolute constraints. When consulted on in 2018, as part of the Strategic Options consultation, the option including these 3 Green Belt sites was considered the most sustainable of the options presented and was chosen as the Council's preferred approach. Further strategic options proposing smaller scale Green Belt releases were consulted on in 2019 (option 5-which performed well in the accompanying Sustainability Appraisal (SA)).

EBC's rationale for its preferred spatial strategy for the borough is set out in its Topic Paper: How the spatial strategy was formed (June 2022). This provides a comprehensive audit of how the options for the spatial strategy have evolved / been discounted with reference to the evidence base including the Sustainability Appraisal.

EBC is content that its preferred spatial strategy for the borough is supported by its evidence base and that 'no stone has been left unturned' in meeting its housing need and is in accordance with the NPPF.

This will be investigated thoroughly through the Examination-in-Public process whereby it

This option was further refined later in the process (becoming option 5a). The results of the SA are summarised on page 100 of Topic Paper 1 and show that option 5A also performed strongly.

In Topic Paper 1, EBC sets out that it disagrees with the findings of its Green Belt evidence base (which was produced independently by Arup) in a number of areas. The Council has also set out that even where the Green Belt performance of a site is assessed as weak, this performance remains too great to consider the release of a site from the Green Belt. Whilst, at face value, this is a legitimate stance to take, there is concern with this overall position given the intensity of the housing needs in Elmbridge and its Wider Housing Market Area. This has been touched upon above and is described in more detail later in this letter.

Certainly, in the development of the Runnymede 2030 Local Plan, in light of the pressing housing needs in the Borough which could not be accommodated in a nearby or neighbouring Local Authority area, the Council looked to release some Green Belt land to meet identified needs. In paragraph 69 of the Inspector's letter into the soundness of the Runnymede Local Plan¹, the Inspector concluded that the Council's strategy to only consider sites for release from the Green Belt that could be shown to perform most weakly against the purposes of including land within it was a justified approach, which was consistent with national planning policy by ensuring that maximum protection was given to the Green Belt.

Furthermore, whilst it is accepted that the Inspector examining the Elmbridge Local Plan will need to assess the robustness of the Elmbridge Green Belt Review work independently, and take a view on whether the Council's objections to its findings are well founded, RBC wishes to comment that Arup, who produced EBC's Green Belt Review work, has significant experience in this area of work. They are independent and utilise a methodology broadly agreed by many local authorities in the wider region. At the Examination of the Runnymede Local Plan, the Inspector concluded that Arup's Green Belt Review work in Runnymede was

will be for the Planning Inspector to determine if the strategy is sound.

‘comprehensive, systematic and based on a robust, consistently applied methodology that properly reflected local circumstances and the unique characteristics of the borough in assessing how the Green Belt serves the purposes laid down in national planning policy (para 68)’.

In line with the above commentary, it is considered that the spatial strategy options for the Elmbridge Local Plan should be reconsidered. It is notable that within the tests of soundness for a Local Plan, as set out in the NPPF (para 35), that the strategy chosen by the Council does not have to be the most appropriate, but instead, an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. RBC is of the opinion that, given all the circumstances described in this letter, a spatial strategy proposing the release of Green Belt land in Elmbridge to meet identified needs is justified.

It is noted in paragraph 3.31 of the draft Local Plan that, ‘The council has considered making changes to the Green Belt boundary, and has followed national planning policy, which requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. In making this assessment and informed by the evidence, the council has concluded that exceptional circumstances have not been fully evidenced and justified to make changes to the Green Belt boundaries in the borough’.

However, in its Exceptional Circumstances Paper of 2016, EBC set out the factors that the Council ‘will recommend to the Planning Inspector which it considers are capable of amounting to “exceptional circumstances” that, would justify any amendments to the Green Belt boundary, as part of the preparation and examination of the Elmbridge Local Plan... These are considered to be: Housing Need; House Prices & Affordability Issues; Affordable Housing Need; Starter Homes, Self-Build & Custom Housebuilding; and Imbalance in Housing Mix’ (see chapters 5 and 7).

Topic Paper 1 refers to an Exceptional Circumstances Case: Green Belt from

As part of its Local Plan preparation EBC has consulted upon several options that could have formed the development strategy for the borough including, some that could meet our development need in full.

As set out in the Topic Paper: How the Spatial Strategy was formed (June 2022), the Council’s initial preferred option as identified in the Strategic Options Paper (2016/17) was based on the Government’s national planning policy position at the time and based on the evidence base that had been prepared to support this early stage of engagement.

Upon the publication of the Options Consultation (2019) the Council rescinded its decision regarding a preferred development option.

As the Council’s Local Plan has progressed and its evidence base emerged and read as a whole, it has been determined that exceptional circumstances cannot be fully evidenced and justified to amend the boundaries of the Green Belt in order to meet the Local Housing Need figure in full.

EBC’s approach is considered consistent with the NPPF (paragraphs 11b(i) and (ii)) and will be investigated thoroughly through the

<p>January 2022. In particular, the topic paper states: Prepared by officers, the paper identified and considered whether exceptional circumstances could be fully evidenced and justified to make amendments to the boundary of the Green Belt in accordance with national policy and guidance and case law. Whilst it is up to the elected members at Elmbridge whether they agree with the recommendations of their officers or not, it would be very useful to see the narrative in this latest Exceptional Circumstances paper and have the opportunity to comment on it. RBC is concerned about a lack of transparency and would find it helpful to see the above-mentioned paper if it formed part of the decision making process in relation to Exceptional Circumstances in Elmbridge.</p>	<p>Examination-in-Public whereby it will be for the Planning Inspector to determine if the strategy is sound.</p>
<p>The Council sets out in Topic Paper 1 that it, 'does not consider the acuteness / intensity of the objectively assessed need to be so much so that, this would justify amending the Green Belt'.</p> <p>RBC is surprised by this conclusion given the following information contained within the topic paper:</p> <p>Paragraph 4.8: 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.</p> <p>Paragraph 4.39: Elmbridge is the 4th most difficult place to get onto the property ladder across the UK and 1st across the UK excluding London.</p> <p>The topic paper seeks to downplay the acuteness of its housing needs in the Exceptional Circumstances chapter by stating</p>	<p>EBC agree that this matter regarding the intensity of objectively assessed need and exceptional circumstances will be further scrutinised at the Examination in Public.</p>

in paragraph 6.28 that, 'putting the borough's local housing need into context, the Council does not consider its local housing need any more intense / acute when compared to other neighbouring Local Planning Authorities (LPAs) and those in the wider South East'. However, this is contrary to statements made in the Council's 2016 Exceptional Circumstances Paper which clearly set out why the situation in Elmbridge is unique and different from neighbouring Local Authorities:

'The level of objectively assessed housing need in Elmbridge Borough may not appear to be particularly unique when compared to other local authorities'; with many neighbouring authorities having a greater number of new homes to provide. However, it is perhaps the factors generating the need for new homes in the Borough that make the local authority's circumstances exceptional from its neighbours (para 5.2.5)... it is clear that high house prices and subsequent affordability issues (despite higher than average earnings) within Elmbridge Borough are the worst in the South East and that the degree of the issue places the Borough in the same position as many London Boroughs; thus making the Borough unique in comparison to its neighbouring authorities to the east, south and west (5.3.10)'.

These circumstances do not appear to have changed in more recent times with EBC accepting at para 6.41 of its Topic Paper that, 'Elmbridge has one of the highest average house prices in the South East and that affordability levels are amongst the highest in Surrey'.

It is considered that this is a matter that would benefit from further scrutiny at the Council's Examination in Public given the Council's change of position on whether Exceptional Circumstances exist, and given the contrary information presented within the topic paper itself around the intensity of the Borough's housing needs.

Finally, the performance of EBC in the Housing Delivery Test is considered to be of relevance in assessing the intensity of the Borough's housing need. The results of the Housing Delivery Test for Elmbridge since the test was introduced are set out below:

<p>2018= 62% buffer 2019 = 58% buffer 2020 = 58% presumption 2021= 70% presumption</p> <p>The above indicates that within Elmbridge, insufficient homes are being built, and there is concern that a continued 'Urban Area only' approach moving forwards is unlikely to address the ongoing shortfalls in the delivery of new homes to meet needs.</p>	
<p>In addition to the above, consideration also needs to be given as part of the exceptional circumstances argument for Elmbridge to the level of unmet need in the surrounding area. EBC has estimated that this level of need is likely to be in the region of 11,500 dwellings arising from neighbouring authorities, and those in the Housing Market Area (HMA 3), over a fifteen-year period (see Appendix B of Topic Paper 1). A large part of this is from Elmbridge's HMA partners. Given the predicted large level of unmet need in the HMA, this is considered a pertinent consideration in the Exceptional Circumstances exercise. RBC considers that this factor has been given insufficient weight in the balancing exercise. This is especially true given that no evidence is provided that any of the Local Authorities in Elmbridge's HMA (including Elmbridge itself) have identified a Local Authority partner to meet any unmet needs.</p> <p>In conclusion, RBC does not support the conclusions drawn by EBC in relation to the intensity of the Objectively Assessed Need in Elmbridge and the surrounding area (especially within its Housing Market Area), and how this has been weighed in the balance in determining whether Exceptional Circumstances exist to release Green Belt land in Elmbridge.</p>	<p>RBC's concerns regarding unmet housing needs and the consideration of exceptional circumstances is a matter for the Examination in Public of EBC's draft Local Plan.</p>
<p>In its Exceptional Circumstances narrative, EBC refers to the majority of sites being considered for potential removal from the Green Belt, as not being located within a walkable distance (up to 800m) of key services and facilities including public transport nodes, however this is based on walkability only. This is one reason given to support why sites are not proposed for release from the Green Belt.</p>	<p>The concerns raised by RBC in their Regulation 19 representation regarding the sustainability of Green Belt sites in EBC's draft Local Plan will be a matter for the planning inspector to consider at the Examination In Public.</p>

Para 6.169 of Topic Paper 1 states, 'It is also the Council's view that given the dispersed nature of the Green Belt sites, there will not be the opportunities to provide new or enhanced walking and cycling routes between them'.

However, the SA results for the Option 5 sites, as set out at table 10 of the 2022 Sustainability Appraisal, show that only 1 site has a negative impact on objective 4 of the Sustainability Appraisal which is concerned with accessibility, with all remaining sites having a neutral or minor positive score. For completeness, the relevant SA objective relating to accessibility is set out below:

4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities. Many of the potential Green Belt release sites assessed in the Council's Green Belt Boundary Review-Accessibility Assessment (June 2019) were assessed as either having fair or good accessibility (pages 40-43). Specifically of the 14 sites listed at paragraph 6.66 of Topic Paper 1, 1 has excellent accessibility, 4 have good accessibility and a further 7 have fair accessibility.

Overall, the Council's conclusions drawn on the accessibility of Green Belt sites being considered for release do not appear to be supported by the Sustainability Appraisal. It is also unclear how hard EBC has looked at the potential to make improvements to its cycle network to ensure that local facilities are brought within reach of the potential Green Belt release sites. No evidence has been found of any detailed route based assessment work and/or feasibility work being undertaken which would substantiate the Council's position. This is supported by the comments in paragraph 1.14 of the Green Belt Boundary Review-Accessibility Assessment which states that, 'This assessment has several limitations, for example, it is solely focused on the existing infrastructure and service provision and does not consider mitigation measures or infrastructure improvements that could improve accessibility. Nor does it consider the introduction of new facilities such as new educational facilities. Therefore, the assessment does not conclude whether an individual area would be conducive to

<p>promoting sustainable patterns of development’.</p> <p>RBC agrees with the comments of EBC in paragraph 1.15 of the above-mentioned assessment which states that, ‘In addition, when promoting sustainable patterns of development, is not just about accessibility. To this end, the assessment does not make any recommendations to discount or progress an area for further consideration against the other aspects of sustainable development including, how it performs against constraints or designations which the NPPF seeks to protect’.</p>	
<p>Sensitivity of the landscape is another factor which has been weighed in the balance in deciding whether Exceptional Circumstances exist in Elmbridge to release land from the Green Belt. However, the Council has not explored whether landscape sensitivity is an absolute bar on development occurring. It appears through reading the Landscape Sensitivity Study that it is possible for concerns around landscape sensitivity to be addressed through the careful design of schemes which come forwards. This suggests that the findings should not rule out such sites being removed from the Green Belt.</p>	<p>RBC’s concerns regarding landscape sensitivity and exceptional circumstances is a matter that will be considered by Planning Inspector at the Examination in Public of EBC’s draft Local Plan.</p>
<p>Having reviewed the Elmbridge Land Availability Assessment, we support the various assumptions that have been used (for example the windfall rate and other discounts applied.</p> <p>We have two site specific queries however which are set out as follows:</p> <p>-2017/3822 - Sherwood House, 40 Severn Drive, Walton-On-Thames, KT12 3BH. According to the LAA entry this accounts for an additional 30 C3 units but looking at the plans for the site it does not comprise self-contained units in line with Elmbridge’s stated C2 calculations, and is listed as a C2 development, and thus should only count for an additional 15. Therefore we query whether 15 units should be removed from the supply.</p> <p>-2020/1020 - Upper Court, Portsmouth Road, Esher, KT10 9JH. According to the LAA entry this accounts for a net gain of 111 C3 units but looking at the plans for the site it does not comprise self-contained units in line with Elmbridge’s stated C2 calculations and is</p>	<p>EBC consider RBC’s comments on sites supply are based on the Land Availability Assessment published in 2021, not the most up to date Land Availability Assessment which was published in 2022.</p> <p>The site at Severn Drive is not included in the Land Availability Assessment (LAA) (2022), which means the planning permission has expired and there is not an error in supply.</p> <p>Upper Court, Portsmouth Road is featured in Appendix 1 of the LAA (2022). The site is under construction for 55 net and 56 gross units which takes into account the C2 formula. In the LAA (2021), this site was listed without the formula. In the LAA (2022), a footnote has been added for Upper Court which says: Permission is granted for a 112-bed nursing home. After applying the formula, this would result in a housing supply of 56. Therefore, the site should not be removed from the supply.</p>

<p>listed as a C2 development. The officer report states it would provide 56 rooms, which when multiplied by 0.5 would result in a C3 equivalent of 28 units, and when the extant loss of 1 unit is accounted for, the site would result in a net gain of 27. This is compared to the claimed net gain of 111 units and thus we query whether 84 units should be removed from the supply.</p>	
<p>Whilst the Council relies on the Surrey Place Ambition at paras 6.196 to 6.201 of Topic Paper 1, the Inspector should note that the role of this document is to underpin growth identified in adopted Local Plans in Surrey and align these with the infrastructure priorities of the county council and other strategic infrastructure providers, for example in areas such as transport, education and utilities. It is considered inappropriate to rely on this document to support Elmbridge's arguments that it cannot meet its identified needs in full. For the avoidance of doubt, the Surrey Place Ambition is not intended to become a spatial planning document, and has not yet been agreed in its final form/formally endorsed by all of the Local Authorities in Surrey.</p>	<p>Comments noted.</p>
<p>Overall, for the reasons set out in this letter, it is considered that the Housing Strategy which underlies the EBC Local Plan is unsound, as it fails to be positively prepared in the face of intense housing needs in the Borough and surrounding area. Alternative spatial strategies involving Green Belt release, and which would mean the majority/all of the Council's OAN could be met do exist, and these options scored well in the Council's SA. It is considered that these options should again be reconsidered in order to ensure that no stone has been left unturned in meeting EBC's housing needs.</p> <p>It is considered a relevant consideration that no Local Authority has been identified to meet any unmet needs which arise from Elmbridge. To clarify, RBC does not consider it will be able to assist Elmbridge. RBC has already had to amend its Green Belt boundaries to meet its own needs through the Runnymede 2030 Local Plan.</p> <p>The housing needs in Elmbridge and its HMA are acute. Elmbridge should therefore reconsider its position on Green Belt release, considering the significant value and benefits</p>	<p>Comments noted.</p>

of a small amount of Green Belt release against the potential harm.

Please note that Runnymede Borough Council would like to be given the opportunity to appear in person at your Examination in Public to discuss the matters raised in this letter.