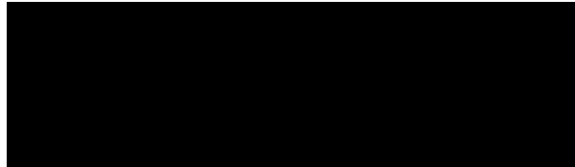


STATEMENT OF COMMON GROUND

1. List of Parties involved:

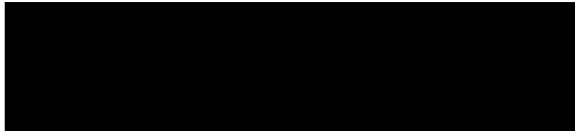
- Elmbridge Borough Council (EBC)
- Guildford Borough Council (GBC)

2. Signatories:



18.07.2023

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



04.07.2023

***Guildford Borough Council
Stuart Harrison, Policy Lead – Planning Policy***

3. Strategic Geography

The Statement of Common Ground (SoCG) is between the local authorities of Elmbridge Borough Council (EBC) and Guildford Borough Council (GBC).

EBC and GBC share a common boundary within the Surrey County Council administrative area (see Figure 1). In terms of planning, both authorities have Green Belt and a range of environmental designations/assets. They also have flood risk, conservation areas and heritage assets which constrain development.

EBC and GBC do not sit within the same housing market area. Guildford is located in the West Surrey Housing Market Area (HMA) alongside Woking and Waverley Borough Councils. 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. Both EBC and GBC are in the Enterprise M3 Local Enterprise Partnership.

Figure 1 identifies the strategic geography considered for cooperation on strategic matters as part of the preparation of our respective Local Plans.

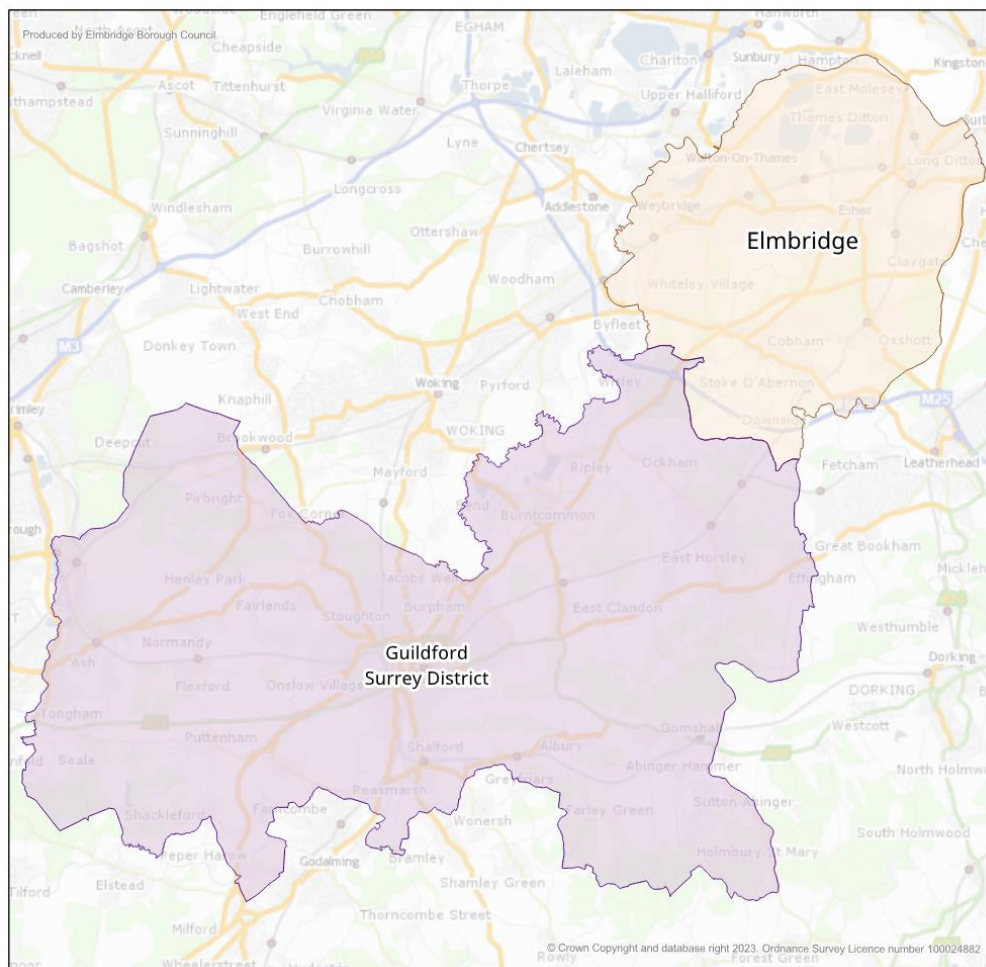


Figure 1: Elmbridge and Guildford Boroughs

4. Strategic Matters

Duty to Cooperate

EBC and GBC 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 their respective Regulation 18 & 19 Stages.

Both parties agree that the duty to cooperate requirements have been met. Their duty to cooperate activities are recorded in the following documents:

- GBC's Topic paper: Duty to Cooperate (December 2017) to accompany Guildford borough Submission Local Plan: strategy and sites
- Guildford Borough Submission Local Plan: Development Management Policies Consultation and Duty to Cooperate Statement (June 2022)
- EBC's 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 latest Local Plan stage 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 and associated updates, as well as this SoCG.

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.

Guildford

GBC adopted their Part 1 - Local Plan: Strategy & Sites 2015 – 2034 on 25 April 2019. The Plan contains strategic policies for development across the borough and the allocation of sites for development. On 5 April 2022, GBC took the decision not to undertake an early review of the Local Plan but instead, carry out the Formal Review towards the end of the statutory 5-year period within which the plan must be formally reviewed.

The Local Plan: Development Management Policies (part 2 of the Local Plan) was adopted on 22 March 2023. The Plan contains detailed policies that supplement the policies in the Local Plan Part 1. It also updates parts of Policy D2 of the Local Plan: Strategy and Sites.

Key Strategic Matters:

Through their on-going discussions and their representations at the Regulation 19 stages, issues relating to Housing, Traveller accommodation, Green Belt and the future new settlement at Wisley airfield have been identified as outstanding strategic matters. The position of each authority in regard to these matters is as follows:

Housing Needs

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.

Guildford

Part 1 of the Local Plan meets identified housing need in full and provides for the delivery of at least 10,678 additional homes by 2034. A total of approximately 14,600 units are allocated in the plan to help ensure a rolling five-year supply of homes and to enable sufficient flexibility should sites not deliver as planned. The preferred location for this development is existing brownfield sites. Approximately 6,500 units will be located in the urban areas, which take advantage of the existing infrastructure and services, reduce the need to travel and offer alternative modes of transport to the private car. This includes sites that were already within

the urban area and further allocated urban extensions. A further approximate 1,300 units are allocated in and around villages, some of which are now inset from the Green Belt, with 2,000 allocated at a new settlement at the former Wisley Airfield.

Travellers:

Elmbridge

The need for Gypsy, Roma and Traveller pitches during the plan period has been informed by the Gypsy and Traveller Accommodation Assessment (ORS, 2020) that sets out the current and future accommodation needs. The assessment looks at the needs of Travellers that meet the planning definition as set out in the Government's Planning Policy for Traveller Sites 2015. It also assesses those that are undetermined in terms of the definition and those that do not meet the definition.

The Gypsy, Roma and Traveller Site Assessment Study (2022) identified sites to meet the borough's needs for Travellers as set out in the GTAA. Taking into account the recommendations of the GTAA and the grant of permission for 8 pitches since the 2020 GTAA was published, the council has not allocated sites. Rather, it will permit alternatives such as additional pitches on existing sites and windfall pitches, provided these meet the criteria set out in the policy.

There are no sites proposed in the draft Local Plan for transit or short-term site provision within the borough. Surrey County Council has been working closely with Surrey Police and other district and borough councils to identify a transit or short-term site and reduce the impact of unauthorised encampments across the county. A site has been identified in Tandridge and work is progressing on its delivery.

Guildford

GBC's Part 1-Local Plan Policies S2 and H1 sets out how it will meet the needs for Gypsy, Traveller and Travelling Showpeople accommodation. These policies have been informed by GBC's Traveller Accommodation Assessment (TAA) (2017). The TAA found that there was an accommodation need for Gypsies, Travellers and Travelling Showpeople for a mix of tenures for both public and private sites.

The relevant policies allocate sufficient sites to meet the target for 4 permanent pitches for Gypsies and Travellers and 4 plots for Travelling Showpeople up to 2034. There are also sufficient allocated sites to make provision for 8 permanent pitches to meet potential additional need of households of unknown planning traveller status. These allocated sites are for a mix of tenures and provided on a number of small sites and as part of larger development sites to help create sustainable and mixed communities.

The needs of Gypsies, Travellers and Travelling Showpeople who do not meet the Planning Policy for Traveller Sites planning policy definition fall outside this target. However, in order to meet their assessed needs, as demonstrated through the TAA, GBC will seek to provide 41 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople who do not meet the planning policy definition.

In addition to Local Plan site allocations, Gypsy, Traveller and Travelling Showpeople accommodation is required within development sites of 500 homes or more, whilst there remains a need in Guildford borough, to help create sustainable, mixed communities with suitable accommodation for all.

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 Areas 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 evidence 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.

Guildford

Most of GBC's open countryside is designated as part of the Metropolitan Green Belt that surrounds London and, following adoption of Local Plan - Part 1, covers 83.5% of the Borough. As part of the preparation of their Local Plan – Part 1, GBC considered that exceptional circumstances existed to justify the amendment of Green Belt boundaries in order to facilitate

the development that is needed and promote sustainable patterns of development. Whilst the general extent of the Green Belt has been retained, land has been removed from the Green Belt in order to enable development around Guildford urban area, selected villages, and at the former Wisley airfield. In total, 1.5% of Green Belt land has been removed and allocated for development during the plan period.

Wisley Airfield / Infrastructure / Transport

The former Wisley Airfield has been allocated as a strategic site in GBC's Local Plan (2019) and will deliver a new mixed-use development in the borough including the provision of up to 2,000 new homes.

The potential impact on local infrastructure of the proposed development was assessed as part of Guildford's Local Plan – Part 1, with the mitigation required to off-set the impact identified as part of the Plan and associated evidence base documents. Mitigation identified in the site allocation includes a new primary school, a new secondary school should this be needed at the time the planning application is determined and a significant bus network to serve the site, as well as other areas including Cobham. This site along with other strategic sites are supported by the Guildford Strategic Development Framework SPD (adopted 2020). This includes detailed expectations for the delivery of the site including for example, a movement framework; what is expected from a Transport Strategy and other infrastructure requirements.

EBC has raised concerns regarding the potential impact of the new settlement at Wisley airfield on the nearby villages of Cobham and Oxshott (in Elmbridge Borough) at both the Local Plan and planning application stages, responding to the concerns of its residents.

As part of its Local Plan preparation, EBC has considered the impact of development at Wisley Airfield alongside the proposed level of growth set out in the draft Elmbridge Local Plan. This has been considered as part of the Elmbridge Local Transport Assessment 2022, taking into account the upgrade to the M25 Junction 10 (A3 Wisley Interchange) to reduce congestion, improve safety and create more reliable journeys. The Assessment identified that no further mitigation on the road network (strategic and local) around the two boroughs is required. This has been agreed with National Highways and Surrey County Council.

In addition, EBC has also prepared an Infrastructure Delivery Plan (IDP) to support the preparation of the draft Local Plan and identify any mitigation required to off-set the impact of the proposed development strategy for the borough. In preparing the IDP, EBC engaged with infrastructure providers who, in submitting their response, would have taken into account any cross-boundary issues such as for example, health and education provision. As set out in the IDP, no cross-boundary issues are identified.

Current positions:

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

- GBC notes that the draft Elmbridge Local Plan does not meet objectively assessed needs in relation to housing based on the Government's standard methodology.
- GBC notes that EBC does not consider that exceptional circumstances exist to justify amending Green Belt boundaries.
- As with the case of the Guildford Local Plan, GBC considers that housing need can and should form part of the exceptional circumstances test.
- GBC consider that a thorough and robust approach will be necessary in demonstrating at Examination that EBC's housing needs cannot be met in full. Particularly, as having unmet

housing need places increased pressure on neighbouring authorities whom all have similar constraining factors as Elmbridge.

- GBC has raised concerns that EBC is not planning on meeting their full need for Traveller accommodation / pitches and, for the accommodation needs of 'non-travellers', which may result in cross boundary impacts and result in increased pressure on traveller sites within other boroughs.
- GBC adopted the Local Plan: Strategy and Sites in April 2019. This plan allocates sufficient homes to meet Guildford's full housing need with an appropriate level of supply over and above the minimum requirement to ensure that the housing need can actually be delivered over the plan period and a rolling five-year land supply can be maintained. The headroom is not surplus supply and cannot therefore contribute towards meeting unmet needs from elsewhere. GBC is not in the same housing market as EBC and GBC considers that, if EBC has unmet needs, this housing should ideally be met by local authorities within EBC's own housing market area.

Guildford Local Plan – Elmbridge Borough Council's position

- EBC notes the stage of the Guildford Local Plan and the intention to undertake a Formal Review towards the end of the statutory 5-year period.

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.
3. The two authorities will continue to work together and with other relevant infrastructure providers e.g., Surrey County Council and National Highways, to ensure that the identified infrastructure mitigation for the Strategic Site at the Former Wisley Airfield is provided.

Matters not specifically addressed within this Statement of Common Ground

The parties agree:

The following matters are defined in the National Planning Policy Framework as strategic matters but are not specifically addressed in the context of this Statement of Common Ground (the authorities continue to work together on these matters as appropriate).

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

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); and
- Surrey Planning Working Group (PWG).

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; and
- to continue to work with the other Surrey authorities on housing, employment and other strategic issues affecting Surrey as a whole.