



Submission Surrey Heath Local Plan
(2019 – 2038)

STATEMENT of COMMON
GROUND SCG09

with Runnymede Borough Council



December 2024

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I. Introduction

- I.1. This Statement of Common Ground (SCG) has been prepared jointly between **Surrey Heath Borough Council (SHBC)** and **Runnymede Borough Council (RBC)**. It sets out the agreed position as at December 2024 in relation to relevant cross boundary strategic planning matters and particularly Green Belt matters and the needs of Gypsies and Travellers and Travelling Showpeople. It has been prepared to support the Submission Surrey Heath Local Plan (2019 – 2038) (Local Plan) and has been agreed by both SHBC and RBC and demonstrates ongoing cooperation between the two parties in line with the requirements set out below.
- I.2. Under Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended by Section 110 of the Localism Act 2011) and in accordance with paras. 24-27 of the National Planning Policy Framework (NPPF 2023), it is a requirement under the duty to cooperate for a local planning authority to engage constructively, actively and on an ongoing basis in the preparation of development plan documents and other documents. This is a test that local authorities need to satisfy prior to the local plan examination stage and is an additional requirement to the test of soundness.
- I.3. The duty to cooperate applies to strategic cross boundary matters (those that might apply are set out in para. 20 of the NPPF). The statutory requirements of the duty to cooperate are a legal obligation although it is not a duty to agree. Cooperation should produce effective and deliverable policies on strategic cross boundary matters in accordance with national planning policy, as further explained in National Planning Practice Guidance (NPPG).
- I.4. The Council published a Duty to Cooperate Statement of Compliance, July 2024 alongside the Pre-Submission Surrey Heath Local Plan setting out how the duty had been met to date. An update to this Duty to Cooperate Statement has been prepared for Submission of the Surrey Heath Local Plan setting out how the Council has continued to engage with relevant duty to cooperate bodies since July.



2. Background

2.1. Runnymede Borough adjoins Surrey Heath on the eastern boundary. Like Surrey Heath it has a significant area of the Borough designated as Green Belt and is affected by the Thames Basin Heaths Special Protection Area. There are a range of potential strategic cross boundary matters that affect the two authorities. The Surrey Heath Duty to Cooperate Scoping Framework identifies all strategic cross boundary matters as being relevant, other than flooding:

- Matter 1: Meeting Housing Needs
- Matter 2: Gypsies and Travellers and Travelling Showpeople
- Matter 3: Economic Growth
- Matter 4: Thames Basin Heaths Special Protection Area
- Matter 5: Natural and Historic Environment and Green Belt
- Matter 7: Transport
- Matter 8: Social Infrastructure
- Matter 9: Utilities
- Matter 10: Climate Change

2.2. Runnymede Borough Council adopted their Local Plan in July 2020. A timetable for updating the Runnymede Local Plan was agreed in October 2024 with formal commencement to take place on 1 September 2025.



3. Cooperation to date

Record of engagement

- 3.1. Table 6 of the Council's Duty to Cooperate Compliance Statement, July 2024 and subsequent Duty to Cooperate Statement of Compliance Update together set out cooperation with each relevant duty to cooperate body during the Plan making process. In summary, engagement with RBC has entailed:
- June 2018 - Consultation on the Surrey Heath Local Plan Issues and options;
 - December 2020 - Letter to RBC regarding potential unmet housing needs and the need for Suitable Alternative Greenspace (SANG) capacity;
 - July 2021 – virtual officer meeting;
 - October 2021 – Letter to RBC regarding identified unmet general housing needs and unmet gypsy and traveller and travelling showpeople needs and whether RBC is able to help meet those needs and RBC response;
 - Spring and Summer 2022 Draft Regulation 18 Local Plan consultations;
 - Spring and Summer 2022 – RBC response to Draft Local Plan consultations;
 - August 2022 – Letter to RBC regarding meeting unmet Gypsy and Traveller and Travelling Showpeople Needs and RBC response;
 - September 2023 – Briefings attended by RBC on the Strategic Highway Assessment Report (SHAR) and Gypsy and Traveller and Travelling Showpeople needs;
 - September 2023 – draft SHAR sent to RBC for comment;
 - October 2023 Letter sent to RBC regarding unmet Gypsy and Traveller and Travelling Showpeople Needs and RBC response;
 - June 2024 – Virtual officer meeting;
 - July 2024 – Letter from SHBC Portfolio Holder to RBC Portfolio holder regarding help with unmet Gypsy and Traveller and Travelling Showpeople Needs;
 - August 2024 – RBC response to July Portfolio letter;
 - August 2024 – Publication of the Surrey Heath Pre-Submission Local Plan;
 - September 2024 – RBC response to the Pre-Submission Local Plan;
 - October 2024 – virtual officer meeting to discuss Pre-Submission representations and the Statement of Common Ground.
- 3.2. In addition to the above, RBC is part of the Thames Basin Heaths Joint Partnership Board and Surrey Planning Working Group.



- 3.3. In response to letters referenced above regarding unmet housing needs and unmet Gypsy and Traveller and Travelling Showpeople needs, RBC identified that they were unable to meet any unmet needs arising from Surrey Heath.

Regulation 18 Representations

- 3.4. RBC responded to the Draft Surrey Heath Local Plan Regulation 18 and to the Gypsy and Traveller Additional Site Allocations consultations in 2022. Fuller summaries of the representations along with SHBC's response can be found in Appendices 4 and 5 of the Consultation Statement, July 2024.
- 3.5. Key cross boundary matters raised by RBC were:

Draft Surrey Heath Local Plan (2019 – 2038)

- Support the delivery of local housing needs in the Borough with unmet need being met from Hart.
- Support Employment needs being met.
- Supports the positive approach to climate change and supports work on cross boundary matters.
- Supports the approach to partnership working on Green Infrastructure and welcome the opportunity to work together to ensure an integrated approach to infrastructure provision.
- Suggested that the part of the Longcross employment site that was in Surrey Heath be removed from the Green Belt given that the substantial part of the site which is located in Runnymede is now in the urban area.
- Looks forward to reviewing the Transport Assessment once it is completed to assess any cross boundary impacts.

Gypsy and Traveller Additional Site Allocations

- Set out that RBC would be unable to meet any unmet Gypsy and Traveller and Travelling Showpeople needs.
- Noted the proposed additional Gypsy and Traveller and Travelling Showpeople sites and the potential shortfall if they were not all deliverable. None of the sites raise any cross boundary issues.



- 3.6. In response to the above, the Green Belt boundary at Longcross was amended to remove the part of the site that lies within Surrey Heath Borough from the Green Belt. The Strategic Transport Assessment was shared with RBC at a briefing session and then the Draft SHAR shared for comment. As set out in the outcomes below no strategic cross boundary highway concerns were identified.
- 3.7. In June 2024 a virtual officer meeting was held to discuss the representations made by RBC on the Draft Local Plan and the emerging Pre-Submission Plan. The outcomes of this meeting summarise the agreed position on strategic cross boundary planning matters prior to pre-submission.

Outcomes – SHBC and RBC virtual officer meeting 10 June 2024

- SHBC updated RBC on their Local Development Scheme and SHBC noted that RBC intend to prepare a new Local Plan under the new '30 month' plan-making arrangements.
- In relation to the forthcoming publication of the Surrey Heath Local Plan Pre-submission version, it was noted that:
 - ◆ no unmet needs for housing supply in Surrey Heath, as the shortfall has been agreed to be addressed via an agreement with Hart DC.
 - ◆ no request from SHBC for RBC to support Surrey Heath in supply of employment floorspace, as residual forecast need for industrial and logistics floorspace is relatively modest and residual forecast need for office floorspace is not considered to be representative of actual market demand
 - ◆ no request from SHBC for SANG capacity to be provided by RBC
 - ◆ whilst it is recognised that there are unmet needs, the flexible Policy approach explained in the Gypsy and Traveller and Travelling Showpeople briefing is welcomed
 - ◆ the Transport Assessment concluded that there are no significant adverse effects on the highways network in Runnymede, arising from Surrey Heath site allocations.
 - ◆ the Habitat Regulations Assessment including Appropriate Assessment, concluded no adverse impact on the Thames Basin Heaths SPA.
- SHBC and RBC agreed that at the current time there are no outstanding cross boundary issues that would affect the SHLP, with the exception of meeting needs for Gypsy and Travellers.
- A Statement of Common Ground will be drafted later in 2024 [this Document], prior to SHBC's submission of the plan to the Inspector for RBC to review.



4. Pre-Submission Surrey Heath Local Plan Representations

- 4.1. Table 1 below sets out a summary of the representations raised by RBC to the Pre-Submission Local Plan and SHBC’s response.
- 4.2. In addition, RBC also responded that they considered that the Local Plan was legally compliant and had complied with the Duty to Cooperate. However, it was considered that the Plan was unsound for the reasons set out below. This was discussed at a virtual officer meeting on 21st October 2024.

Table 1: RBC Pre-Submission representations

RBC Representation	SHBC Response
<p>Paragraph 3.9/Policy HA1/05 Sir William Siemens Square</p> <p>Do not consider that this has been positively prepared in doing all it can to meet unmet needs of gypsies and travellers and travelling showpeople. It is considered that the Policy should set out the minimum number of pitches/plots that can be accommodated on site in the same way as for housing numbers.</p>	<p>Planning permission was granted for demolition of the existing buildings and construction of 170 residential dwellings (Ref: 24/0116/FFU) on 9th August 2024. No Gypsy and Traveller pitches or Travelling Showpeople plots were incorporated into the scheme and this was not considered a reason to refuse the application, taking account of current planning policy and the limited weight which could be attached to emerging planning policy in the determination of the planning application.</p> <p>In view of the stage that this site has reached it is not considered appropriate to include an additional criterion relating to pitches/plots.</p>



RBC Representation	SHBC Response
<p>RBC also adds that it has extremely high needs for gypsy and travellers and travelling showpeople pitches/plots and is unable to take any unmet needs from adjoining areas so wants to make sure Surrey Heath does all it can to meet its own needs.</p> <p>Suggest that the Inspector will need to decide if this unmet need goes to the heart of the soundness of the Plan.</p>	<p>SHBC notes the response from RBC and would reiterate the extensive work that has been undertaken to seek to identify suitable sites to meet needs. This has included a number of letters to adjoining local authorities to ask whether any other authority is able to help meet unmet needs, and holding a briefing session for local authorities to set out the work undertaken and the inclusion of a more flexible policy approach to determine future planning applications. It is not proposed that any changes are made as a result of these comments.</p>



5. Outcomes

5.1. Officers held a virtual meeting on the 21st October 2024. The key outcomes of this meeting were:


- Update on the Surrey Heath Local Plan timetable;
- Constructive discussion on the RBC Pre-Submission representations, which confirmed that planning permission was granted for the re-development of Sir William Siemens Square in August 2024 and that accordingly it was not considered that Gypsy and Traveller provision could be secured through the development.
- As a result, both authorities agree that:
 - There are no unresolved cross boundary strategic matters that affect the delivery of the Surrey Heath Local Plan 2019 – 2038.
 - Surrey Heath has complied with the legal duty to cooperate.
 - Both authorities note the draft transitional arrangements and proposed uplifted housing need for SHBC.

Constructive joint working will continue on relevant cross boundary matters including the Thames Basin Heaths Special Protection Area and in progressing future Local Plans.

- Agreement in principle to an updated SCG.



Signatories

Runnymede Borough Council	
Name	Georgina Pacey
Position	Planning Policy and Climate Change Manager
Date Agreed	2 nd December 2024
Signature	

Surrey Heath Borough Council	
Name	Gavin Chinniah
Position	Head of Planning, Housing, Corporate Enforcement and Parking (interim)
Date Agreed	02/12/24
Signature	