

Statement of Common Ground

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

1) Constituent parties to this SOCG

Epsom & Ewell Borough Council (EEBC)
National Highways (NH)

2) Background

This SOCG sets out the agreed position as at May 2025 in relation to strategic highways matters and Epsom and Ewell Borough Council's (EEBC) Proposed Submission Local Plan.

National Highways (NH) was appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such, NH works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as providing effective stewardship of its long-term operation and integrity.

NH is therefore concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. In relation to the administrative area of EEBC, there is no part of the SRN which passes through the borough.

The M25 lies to the south, with most of the traffic from the borough that use the SRN being likely to pass through M25 J9, with some potential small impacts on M25 J8.

3) Local Plan engagement and outcomes

EEBC has engaged NH during the preparation of the Local Plan. This has included engagement on the evidence base, specifically the Strategic Highways Modelling Assessment Report (2024) as well as consultation at the Regulation 18 and 19 formal consultation stages. Details of this are provided below:

Regulation 18 Draft Local Plan

NH responded to the Regulation 18 consultation. The response highlighted that the closest junction of the strategic road network (SRN) to the borough is the M25 J9. It confirmed that no part of the SRN is within EEBC's administrative area. NH stated that a robust evidence base is required to enable them to constructively engage in the local plan making process and provide sound advice in relation to the appropriateness of proposed development and the impact on the SRN. Overall NH were in support of the relevant policies within the Regulation 18 draft Local Plan.

Strategic Highways Modelling Assessment Report (SHMAR)

Following the Regulation 18 consultation, EEBC commissioned Surrey County Council to undertake a strategic highways assessment of the potential impacts of the emerging Local Plan on the highways network. NH were sent the resulting Strategic Highways Assessment Report in November 2024 for review and responded with queries/comments. SCC and NH engaged on these queries/comments, which were resolved in April 2025.

Regulation 19 Proposed Submission Local Plan

The Regulation 19 Proposed Submission Local Plan consultation was undertaken from 20 December 2024 to 5 February 2025. NH responded to the consultation, key points from which are set out below. The full response is provided in appendix 1.

“Transport Policies:

Policy S19 relating to transport contains the necessary requirements for Transport Assessments and Travel Plan to be included for new development proposals. We would highlight that where development is likely to place significant numbers of trips through SRN junctions, they should also assess the impact they may have on the SRN within the Transport Assessment.

National Highways welcomes the demand management measures included within this policy including the promotion of car-free development in appropriate locations. We recognise that reducing levels of vehicle parking at source can have a significant impact on reducing the impact on the highway network, therefore we encourage development in locations which are well-connected by public transport to take account of this when setting parking levels.

Housing Allocations:

As per policy S1, we note that the plan has allocated sites to achieve at least 4,700 new dwellings during the plan period. The housing allocations are varied in both size and location, with approximately one third being provided on urban brownfield sites. There are five new greenfield sites proposed,

providing a total of 1,580 dwellings out of the 4,700 total. These are mostly focused on the north of the borough, furthest away from the SRN. National Highways would nonetheless expect these to be sustainable sites which encourage a modal shift away from car travel to limit the impact on the highway network, through enabling active and sustainable public transport.

Should any Supplementary Planning Documents be produced regarding any of the larger development sites containing elements that could affect the SRN, National Highways would expect to be consulted.

Employment Allocations:

There are no specific, large employment sites allocated within the Local Plan. Instead, policy DM7 allocates two existing industrial estates in the borough as Strategic Employment Sites which have the highest level of protection for employment uses. No significant expansion of these sites is proposed, and they are both over 5 miles from the SRN. National Highways therefore does not have any comment to make regarding proposed employment allocations.

It should nonetheless be ensured that any application for significant amounts of new employment floorspace, whether on new sites or expansions to existing sites, includes a comprehensive assessment of the impact of the proposals on the road network and where close to a SRN junction, includes full turning movements. Junction capacity assessments may be required for proposals which place a larger number of development trips through SRN junctions. This is particularly likely to be the case for any large new employment sites which may come forward in the south of the borough, outside of existing employment areas.

Transport Evidence Base & Infrastructure Delivery Plan:

A Strategic Highways Modelling Report (SHMR) dated October 2024 is included within the Regulation 19 consultation. This work forms a key piece of evidence to demonstrate that the Local Plan is sound, therefore it is important that any identified mitigation which the plan or its allocations are reliant upon has a reasonable prospect of delivery within the timescales of when the identified growth is planned. As noted above, National Highways have already had discussions with Epsom & Ewell Borough Council about this report and we will continue to liaise with the Council to resolve our outstanding requests for information.

Having reviewed the updated Infrastructure Delivery Plan (IDP) dated November 2024, there are no significant transport schemes proposed which will have a significant impact on the SRN. Should this change due to any further work undertaken on the Strategic Highways Modelling Report (SHMR), we would expect that an updated IDP would be prepared.”

The response does not highlight any significant concerns with the Proposed Submission Local Plan and confirms that NH, the planning authority (EEBC)

and the Highways Authority (SCC) are still liaising over the supporting transport evidence (the Strategic Highways Modelling Assessment Report).

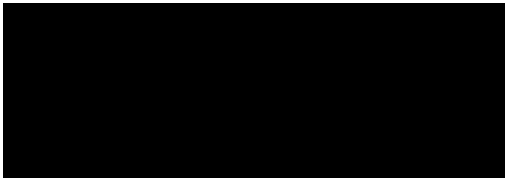
4) Positions of the parties

Both parties agree:

- NH do not have any significant concerns in relation to the Proposed Submission Local Plan
- NH raised a number of queries/points of clarification in relation to the Strategic Highways Modelling Assessment Report, which have now been resolved.

5) Signatories

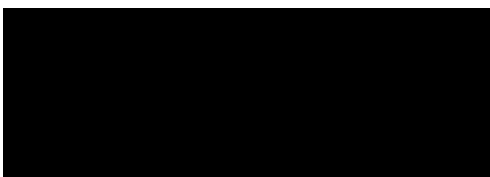
Epsom & Ewell Borough Council



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

Date: 7 May 2025

National Highways



Janice Burgess
Spatial Planner

Date: 2 May 2025

Appendix 1: NH Regulation 19 Representation

Dear [REDACTED]

NH/24/09489

Proposed Submission Epsom and Ewell Local Plan Consultation (Regulation 19)

Thank you for inviting National Highways to comment on the Epsom & Ewell Local Plan 2040 Pre-Submission Draft (Regulation 19).

National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. In relation to the Epsom & Ewell borough area, the SRN comprises the M25 south of the borough. In particular, the majority of traffic from the borough using the SRN is likely to pass through M25 J9, with some potential small impacts on M25 J8. No part of the SRN passes through the borough, therefore we do not have any boundary concerns.

Overall, in accordance with national policy, we look to your Local Plan to promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. We welcome the Council's vision in chapter 2 of the plan to provide sustainable development with a focus on reducing carbon emissions whilst promoting active travel and public transport use to limit car journeys and congestion locally, and on the wider network.

We would be concerned if any material increase in traffic were to occur on the SRN or at its junctions because of planned growth within the borough, without careful consideration of mitigation measures. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure being in place. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN.

National Highways are currently liaising with the Council regarding the Strategic Highways Modelling Report which we received in November 2024. The council have recently responded to our comments in January 2025 and have provided additional information including additional flow diagrams which we requested. Work is currently underway to review this additional information

and a response will be provided separately. It is recommended that a Statement of Common Ground (SoCG) should be agreed between National Highways and the Council to determine and agree the scope of any outstanding work necessary to assess the impact of the Local Plan on the SRN.

Our responses to Local Plan consultations are guided by relevant policy and guidance including the DfT Circular 01/2022 and National Planning Policy Framework (December 2023) (NPPF). We have reviewed the available information regarding policies contained within the Local Plan, our comments are set out below:

Transport Policies:

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Statement of Common Ground

We are still liaising with the Council and have requested further information that we will review alongside the supporting transport evidence base going forwards. It will be essential for National Highways and the Council to agree a statement of common ground following our review of the modelling, setting out any potential concerns and agreed next steps in advance of an Examination in Public. I look forward to receiving a draft SOCG in due course.

We look forward to continuing our constructive engagement.

If you have any questions with regards to the comments made in this response, please do not hesitate to contact us via PlanningSE@nationalhighways.co.uk.

Regards,

