

Statement of Common Ground

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

1) Constituent parties to this SOCG

Epsom & Ewell Borough Council (EEBC)
Historic England (HE)

2) Background

This SOCG sets out the agreed position as of May 2025 in relation to EEBC's Submission Local Plan. Historic England (HE) are the governments advisor on the historic environment and seek to ensure that the protection of the historic environment is fully taken into account at all stages of the plan making process.

HE has been engaged at key stages throughout EEBC's Local Plan process, the details of which are provided below.

Regulation 18 Draft Local Plan

HE responded to the Regulation 18 Draft Local Plan consultation (February to March 2023), which was supported by an Interim Sustainability Appraisal. The response focused on the draft heritage policies within the Local Plan and the consideration of heritage in the selection of sites. A summary of the representation is detailed below:

- 1) Site selection not appropriately informed by a robust understanding of the historic environment of the Borough, in accordance steps associated with Historic Advice Note 3.
- 2) Request to reference Historic Advice Note 12 when referring to Heritage Statements (Policy S13/S2)
- 3) Policy on Heritage Assets (DM8) should ensure full compliance with the NPPF. It should also address heritage at risk.
- 4) Definition of Archaeological Potential should be included in glossary.
- 5) Plan supported by limited evidence for the historic environment. E.g. no heritage specific documents have been produced. Evidence should be published as per para 193 of NPPF. A heritage SPD or Heritage conservation strategy can be useful.

Post Regulation 18 Consultation

Following the receipt of the comments on the Regulation 18 Local Plan EEBC and HE have worked together to address the issues raised during the Regulation 18 consultation stages from all respondents.

In February 2024, EEBC sent draft revised Local Plan policies to Historic England and Surrey County Councils Historic Environment Planning Team. Comments on the draft policies were received from Historic England.

In September 2024, EEBC sent the final heritage policies and draft Topic Paper / Strategy to HE for comment. A response was received in October 2024 stating that the approach EEBC are taking is consistent with the NPPF and would likely, therefore, to be judged to be sound when assessed at EIP.

Regulation 19 Proposed Submission Local Plan

The Council consulted HE on the Regulation 19 Local Plan on 20 December 2024 and a response was received on the 3 February 2025 stating that HE's comments on the Regulation 18 stage draft Local Plan have largely been addressed in the current Publication version of the Local Plan or are, in their view, not now likely to affect the soundness of the Local Plan.

A copy of HE's Regulation 19 response is provided in Appendix 1.

3) Positions of the parties

Both parties agree:

- The Local Plan 2022-2040 sets out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats, in accordance with para 196 of the NPPF.
- The Local Plan process has fully considered matters of the historic environment, evidenced by:
 - a) An audit and evaluation of heritage through the heritage topic paper;
 - b) The inclusion of the historic environment as a key element of the vision and strategic objectives of the Local Plan;
 - c) Heritage Impact Assessment of all site allocations in the plans;
 - d) The Consideration of Conservation Areas and Listed Buildings in the Site Selection Methodology.
 - e) The development of policies in collaboration with Historic England and Surrey County Council.

4) Signatories

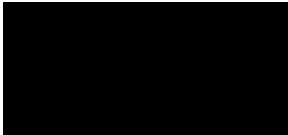
Epsom & Ewell Borough Council:



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

Date: 14/05/2025

Historic England:



Alan Byrne - Historic Environment Planning Advisor

Date: 13/05/2025

Appendix 1: Historic England Regulation 19 Representation



Planning Policy
Epsom and Ewell Borough Council
Town Hall, The Parade
Epsom
Surrey, KT18 5BY

Our ref: PL00039550

Your ref:

Telephone
Email



By email only to localplan@epsom-ewell.gov.uk

Date 3 February 2025

Dear Sir or Madam

Epsom and Ewell Local Plan 2022-2040 Regulation 19 Consultation

Thank you for your email of 20 December 2024 inviting comments on the above consultation document.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.

There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. In our previous comments (by letter dated 16 March 2023), Historic England focused on the objective of the National Planning Policy Framework to set out a positive strategy for the conservation and enjoyment of the historic environment (Paragraph 196, NPPF); and contain policies to sustain and enhance the significance of the heritage assets (Paragraph 196 a, NPPF).

Our comments on the Regulation 18 stage draft Local Plan largely have been addressed in the current Publication version or are, in our view, not now likely to affect the soundness of the Local Plan.

We welcome the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the NPPF. We note also the significant progress that has been made on preparing a proportionate evidence base for the local plan heritage policies in the form of a draft heritage topic paper. The key test of the soundness of the plan and the achievement of sustainable development as defined in the



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Historic England

NPPF in respect of the elements that relate to the historic environment (paragraph 196), in our view, have been met.

We should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. We hope that these comments are useful.

Yours sincerely

Alan Byrne
Historic Environment Planning Adviser



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