

# The West Surrey Functional Economic Market Area for Guildford, Waverley and Woking Borough Councils

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## 1 Introduction

1.1 Planning Practice Policy Guidance (PPG) published in March 2014 recommends a consideration of the wider property market area, also referred to as the Functional Economic Market Area (FEMA), in assessing the employment land needs of a given location (see in particular paragraphs 012 and 030-032 of the guidance).

1.2 Paragraph 012 of the PPG, copied below, identifies methods for determining appropriate functional economic market areas:

***“How can functional economic market areas be defined?”***

*The geography of commercial property markets should be thought of in terms of the requirements of the market in terms of the location of premises, and the spatial factors used in analysing demand and supply – often referred to as the functional economic market area. Since patterns of economic activity vary from place to place, there is no standard approach to defining a functional economic market area, however, it is possible to define them taking account of factors including:*

- *extent of any Local Enterprise Partnership within the area;*
- *travel to work areas;*
- *housing market area;*
- *flow of goods, services and information within the local economy;*
- *service market for consumers;*
- *administrative area;*
- *Catchment areas of facilities providing cultural and social well-being;*
- *transport network.*

*Suggested Data Source: Office of National Statistics (travel to work areas)”.*

1.3 Taking each of these bullet points in turn, this paper will set out why Guildford, Woking and Waverley boroughs combined make a logical FEMA.

1.4 All three local authorities have agreed on the extent of the West Surrey FEMA.

## 2 Extent of any Local Enterprise Partnership within the area

2.1 Local Enterprise Partnerships (LEPs) are key drivers of economic development at the sub-national level. They bring business and civic leaders together to drive sustainable economic growth and create the conditions for private sector job growth in their communities. There are 39 local enterprise partnerships operating across the country.

2.2 Figure one illustrates the extent of the Enterprise M3 (EM3) LEP, within which the three councils sit. The area covered by the LEP runs along the lines of the M3 motorway to the New Forest and South Coast, taking in several towns in Hampshire and Surrey (including Basingstoke, Camberley, Aldershot, Andover, Guildford and Woking) and the city of Winchester. The LEP is located in

close proximity to London, the key international gateways of Heathrow and Gatwick airports, and sea routes from Southampton.



**Figure 1: Geographic area covered by the Enterprise M3 LEP.** Source: <https://www.enterprisem3.org.uk/static-map>

### 3 Housing Market Area (HMA)

- 3.1 The West Surrey Strategic Housing Market Assessment (SHMA) prepared for Guildford, Waverley and Woking Borough Councils (September 2015) by GL Hearn defines this area as the same Housing Market Area (HMA). The PPG describes an HMA as a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. Planning Practice Guidance indicates that local planning authorities can use a combination of approaches to identify relevant housing market areas, recognising that there is not a single comprehensive source of information.
- 3.2 The SHMA considers existing national and regional research including the 2010 Geography of Housing Market Areas published by the Government (CLG), which sought to consider the geographies of housing markets across England. The CLG research defined Guildford, Waverley and Woking Local Authorities as falling within the London Strategic Housing Market Area. Within these defined strategic market areas, the CLG research also defined a number of local housing market areas (LHMAs) (based on 2001 Census analysis). The Guildford LHMA covers all of Woking, all but one ward in the borough of Guildford and one ward in Waverley. The LHMA also covers parts of Rushmoor, Surrey Heath, East Hampshire, Elmbridge and Runnymede.

- 3.3 A regional study was undertaken by DTZ for the South East England Regional Assembly and Homes and Communities Agency in 2004 to define housing market areas across the South East. These were subsequently incorporated into the now revoked South East Plan (2009). The DTZ study identified a total of 21 housing markets across the South East which were agreed on by local authorities and other stakeholders. One of the identified housing market areas was named the Guildford/Woking HMA. The area covered the majority of authorities in West Surrey, including Waverley, Guildford, Woking, Surrey Heath, Runnymede and Elmbridge. The influence of the housing market also extended further south into East Hampshire.
- 3.4 In line with Planning Practice Guidance, the SHMA analyses three key data sources (price trends and dynamics, commuting flows and migration patterns) in order to define the extent of the relevant HMA. Looking at average house prices and price trends, GL Hearn found reasonably strong market comparability between Guildford and Waverley as well as with some parts of Woking.
- 3.5 The SHMA also emphasises that migration patterns clearly confirm the strength of relationships between Guildford, Waverley and Woking as a core HMA. Whilst there are also links between Guildford, Waverley and Woking with other authorities around each of them (for instance between Guildford and Rushmoor, Waverley and East Hampshire, and Woking and Runnymede), an analysis of the flows from these neighbouring authorities suggests that their strongest relationships are in fact with other authorities (para 2.34).
- 3.6 Section two of the SHMA concludes (para 2.53 -2.55);
- “There are clearly a complex set of relationships at play; however, data across all three primary sources clearly demonstrates significant integration between Guildford, Waverley and Woking. This is borne out in all of the strands of analysis. The triangulation of the sources strongly supports defining these three authorities within the same Housing Market Area. We therefore consider the definition of a Guildford centric HMA covering these three authorities as a core area to be appropriate”.*
- 3.7 The Planning Advisory Service’s July 2015 Technical Advice Note on ‘Objectively Assessed Need and Housing Targets’ clarifies that on a practical basis it is appropriate to define housing market areas on the basis of local authority boundaries. In the SHMA GL Hearn agree that this approach is sensible, not least as key demographic data and projections are not published below local authority level.
- 3.8 The Planning Advisory Service’s Technical Advice Note (2015) contains a section on HMA and economic market areas (para 5.31-5.35). It sets out the expectation that HMAs and economic market areas will be geographically similar because both are largely determined by the link between where people live and work. Households’ location decisions are largely driven by access to jobs and services and business location decisions are largely driven by access to the workers that fill jobs. The Note states;
- “For this reason, and also for convenience, it is helpful if HMAs and economic market areas are coterminous. This makes both analysis and policy-making more manageable: the alternative of working with two larger-than-local areas, one for*

*housing and one for economic land uses, adds layers of complexity. It also makes it possible to plan for alignment of jobs and workers – something which is very difficult to do at the level of individual authorities, precisely because labour markets are larger than local” (para 5.35).*

#### **4 Travel to work areas**

4.1 The West Surrey SHMA contains information about travel to work areas as part of defining the HMA. The report considers Travel to Work Areas (2011 census data analysed by ONS) and data on commuting flows between local authorities. The SHMA highlights a notable commuting flow to Greater London from authorities within Surrey. However, to understand local relationships, the analysis considers flows between individual local authorities.

4.2 The SHMA notes a particularly strong relationship between Waverley and Guildford with over 7,700 people per day travelling from Waverley to Guildford for work (and 3,722 in the other direction). The strongest commuting flow from Woking is to Guildford (4,626 persons), albeit if London Boroughs are considered together, this would result in a stronger flow. The SHMA summary of Commuting Flow Analysis (para 2.51 and 2.52) concludes:

*“Commuting flows indicate a relatively complex pattern of relationships across West Surrey and into Hampshire with labour markets within authorities seemingly integrating to different degrees at different spatial levels.*

*There is once again clear confirmation of the strong functional interactions between Guildford and both Woking and Waverley with the three sharing the highest flows of the authorities studied. The analysis also suggests a strong set of interactions between Rushmoor, Surrey Heath and Hart. As with migration, the analysis suggests secondary interactions between Rushmoor and Guildford; Woking and Runnymede; and Waverley and East Hampshire. Strong relationships with London are also evident”. (Emphasis added).*

4.3 An analysis of 2011 Census data also highlights secondary links between West Surrey and Elmbridge and West Surrey and Chichester District. In 2011, more than 2,800 people commuted from Woking to Elmbridge whilst over 2,200 residents of Chichester District travelled to work within Waverley or Guildford. Furthermore, a significant proportion of people employed in Chichester District are known to reside in, and commute from, Waverley.

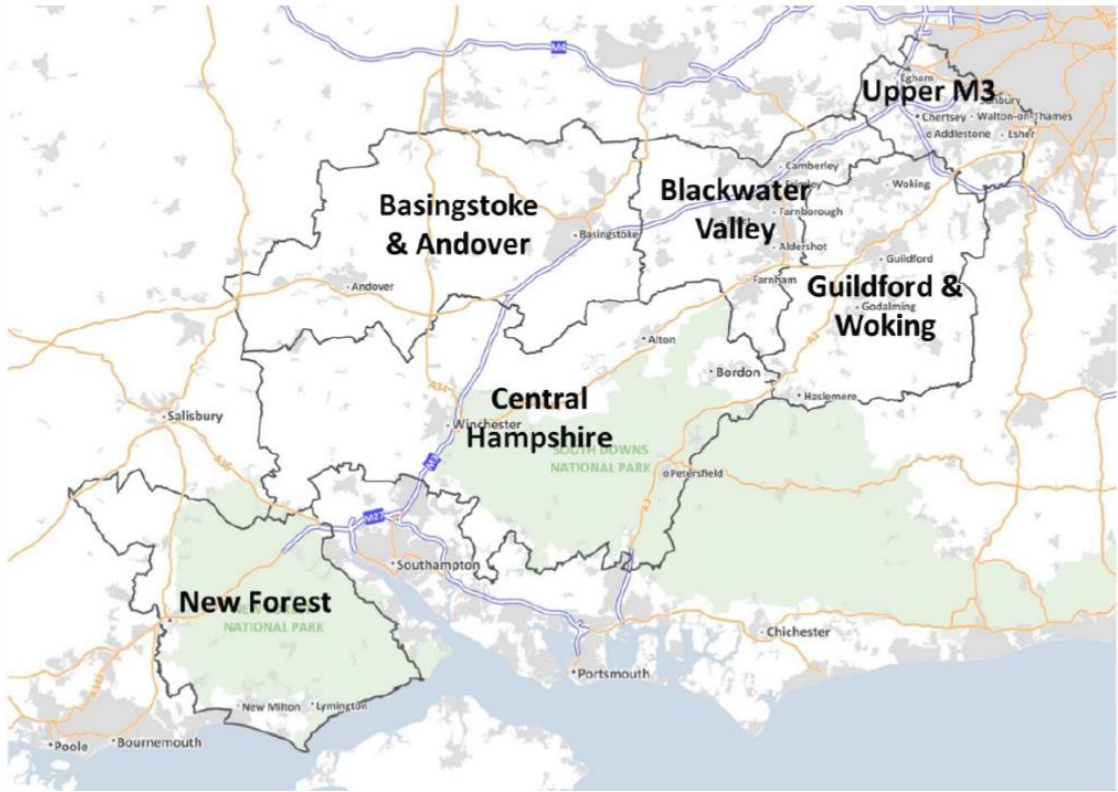
4.4 A comparison of 2001 and 2011 ONS Travel to work maps is also useful in identifying the extent to which commuting patterns have changed over time. Whilst the north-eastern corner of the Guildford and Aldershot Travel to work area identified in 2001 (which included Guildford, Waverley and Woking and extended further east and north) was incorporated into the newly formed Slough and Heathrow Travel to work area in 2011, the majority of the 2001 designation remained intact; indicating that commuting patterns in the region have remained relatively consistent.

Residence	Workplace	Commuters	% of Residents
Waverley	Guildford	7,730	17.6%
Elmbridge	Westminster, City of London	7,005	14.1%
Rushmoor	Surrey Heath	4,693	11.1%
Hart	Rushmoor	4,675	12.5%
Woking	Guildford	4,626	11.2%
Elmbridge	Kingston upon Thames	3,947	8.0%
East Hampshire	Waverley	3,866	8.7%
Guildford	Waverley	3,722	6.7%
Rushmoor	Guildford	3,579	8.4%
Woking	Westminster, City of London	3,273	7.9%
Rushmoor	Hart	3,238	7.6%
Guildford	Westminster, City of London	3,207	5.8%
Guildford	Woking	3,093	5.6%
Hart	Surrey Heath	2,972	8.0%
Woking	Runnymede	2,957	7.2%
Waverley	Westminster, City of London	2,947	6.7%
Runnymede	Elmbridge	2,908	8.9%
Woking	Elmbridge	2,831	6.8%

**Table 1: Commuting flows between Local Authorities, 2011.** Source: West Surrey Strategic Housing Market Assessment 2015 (originally taken from 2011 census).

## 5 Commercial Property Market Area

- 5.1 In 2013, Enterprise M3, through its Land and Property Action Group, carried out a major study of employment land (sites and premises) to help understand the characteristics of the commercial property market in the M3 corridor. Part of the brief was to determine the most appropriate sub-division of the LEP area. Based on the characteristics of the local labour market, the nature of the current supply of employment land, and market indicators such as rental values, the document identified six commercial property market areas in the Enterprise M3 LEP region.
- 5.2 Members of the Land and Property Action Group discussed and agreed the use of these market areas *“as a means of reflecting the practical operation of the property market and to enable discussion about the performance of different sub-markets within the LEP area”* (p14). The study highlighted the difficulties with matching different datasets and information which is only available for particular geographies.



**Figure 2: Commercial Property Market Areas in 2013.**  
 Source: Enterprise M3 Commercial Property Market Study July 2016



**Figure 3: Guildford and Woking Market Area as Defined in Enterprise M3 Commercial Property Market Study.**

Source: Enterprise M3 LEP Commercial Property Market Study 2013 (Appendix 7)



- 5.3 As illustrated in Figures two and three above, the 2013 Commercial Property Market Study defined a market area (known as the Guildford and Woking Market Area) encompassing the entire administrative area of the borough of Woking, the majority of the borough of Guildford, and a large part of the borough of Waverley (including the central and eastern parts of the borough<sup>1</sup>). Farnham, located in the borough of Waverley and Ash, Tongham and Normandy, all situated within the borough of Guildford, were considered to fall within the Blackwater Valley Market Area rather than the Guildford and Woking Market Area.
- 5.4 Due to a change in market conditions, the Enterprise M3 LEP decided to refresh the 2013 study and Regeneris Consulting published an update in July 2016. In contrast to the original study, the document (Enterprise M3 Commercial Property Market Study, July 2016) suggests that Guildford and Woking belong to separate commercial property market areas. Whilst the towns are both large, office based employment centres located in the highly skilled London commuter belt, well connected by rail to the capital, have a similar industrial mix with an economy centred around highly skilled professional services and increasingly ICT, Guildford is recognised to be a more sought after location for office space and thus attracts higher rents. Supply in the town is low (a potential constraint to future investment). Conversely, the report identifies Woking as having a good supply of office space.
- 5.5 The significant difference in demand and resulting rental prices in Guildford and Woking was sufficient for commercial property agents to conclude that increasing supply in Woking could not be used to address a shortfall in office space in Guildford. Accordingly, the Study has recommended that Guildford and Woking are divided into separate commercial property market areas.
- 5.6 Retaining consistency with the 2013 report, the reformed Guildford commercial property market area incorporates large parts of the borough of Waverley, including the towns of Godalming and Haslemere. These towns are recognised in the study as much smaller office centres and therefore play a secondary role to the main office centre of Guildford in the market area. Guildford's importance as a source of employment for these areas is evidenced by the large commuting flows from Waverley to Guildford.
- 5.7 Paragraph 5.11 of the Enterprise M3 Commercial Property Market Study (July 2016) suggests that:
- “given the small scale of the office markets in Waverley, these mostly serve local SMEs and are not appropriate locations for major office occupiers who are attracted to Guildford”.*
- However, the strategy for future employment space in Guildford, Waverley and Woking will be determined by the spatial strategies and policies set out in each Council's emerging Local Plans, informed by all of the evidence base documents upon which they hinge, including the respective Employment Land Needs Assessments.

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<sup>1</sup> See Appendices to main report: accessed in July 2014 from landing page: <http://www.enterprisem3.org.uk/commercial-property-market-study>



**Figure 4: Revised Commercial Property Market Areas.** Source: Enterprise M3 Commercial Property Market Study July 2016

5.8 Whilst the sub-division of the former Guildford and Woking commercial property market area is significant, paragraph 5.12 of the 2016 Study importantly highlights that:

*“this conclusion relates to the commercial property market area of Guildford and Woking and not the functional economic market area (FEMA), which LPAs are required to define in NPPF. Although commercial property markets are one criteria that LPAs need to consider when defining their FEMA, PPG states that a number of other criteria should be considered including the housing market area (e.g. migration and travel to work patterns), service markets for consumers and the catchment areas of facilities providing cultural and social well-being. None of these factors have been considered when determining the commercial property market area for Guildford and Woking”.*

5.9 Given the above statement and the conclusions drawn from the analysis of other factors, the Councils are comfortable that the split of the former Guildford and Woking commercial property market area does not have significant implications for the identification of Woking, Waverley and Guildford boroughs as the West Surrey FEMA.

## **6 Flows of goods, services and information within the local economy**

- 6.1 KPMG's Tech Monitor UK Report 2013 provides a useful overview of economic clustering in the country. The document identifies areas where technology based jobs are clustered and highlights the South East as a key location for such companies. Woking is listed as the Local Authority with the ninth highest concentration of technology based jobs in the country.
- 6.2 Alongside Basingstoke and Farnborough, the towns of Guildford and Woking are identified in M3 Enterprise LEP's Local Strategic Economic Plan (March 2014) as 'Growth Towns'. The four towns currently account for approximately a third of jobs and Gross Value Added in the LEP area and are recommended as areas for substantial future growth (between 2014 and 2019 GVA is expected to increase by 14% across the growth towns). Notable growth packages identified by the LEP in the growth towns include projects to ease congestion, deliver housing and provide specific infrastructure investment to grow the business visitor economy. Improvements to the Guildford A3 Strategic Corridor are identified as important infrastructure upgrades required to support the growth of the LEP area as whole. However, it should be noted that the level of economic and housing growth and supporting infrastructure planned in both Guildford and Woking will be determined by the respective local planning authorities through their individual local plans.
- 6.3 NOMIS data can also provide a useful platform for identifying and comparing the key sectors of the local economy. An analysis of the latest (2014 and 2015) NOMIS data available has highlighted various similarities between the administrative areas of Guildford, Waverley and Woking. The following sectors are considered to be the most prominent in each of the West Surrey Local Planning Authority areas:
- 1) Wholesale and Retail trade
  - 2) Education
  - 3) Professional, scientific and technical activities
  - 4) Human health and social work activities
- 6.4 2011 Census data, copied in table 2 below for information, highlights similar findings. NOMIS (IDBR) data from 2015 also indicates that the proportion of micro, medium and large enterprises in the three boroughs is very similar. As Table 3 illustrates, over ninety percent of businesses located within Waverley employ fewer than ten people; a trend closely mirrored in Guildford and Woking.

Industry	Total no. jobs Guildford	Guildford % of total	Total no. jobs Waverley	Waverley % of total	Total no. jobs Woking	Woking % of total
Agriculture forestry and fishing	219	0.3	340	0.6	90	0.2
Mining and quarrying	220	0.3	141	0.2	191	0.4
Manufacturing	3,820	5.5	3,072	5.2	3,038	5.9
Electricity gas steam and air conditioning supply	243	0.3	206	0.3	180	0.4
Water supply sewerage waste management and remediation activities	373	0.5	222	0.4	272	0.5
Construction	4,901	7.0	4,376	7.4	3,275	6.4
Wholesale and retail trade	9,818	14.0	8,105	13.7	7,593	14.8
Transport and storage	2,521	3.6	1,917	3.2	2,787	5.4
Accommodation and food service activities	3,432	4.9	2,508	4.2	2,089	4.1
Information and communication	5,341	7.6	4,438	7.5	4,217	8.2
Financial and insurance activities	3,560	5.1	3,241	5.5	2,970	5.8
Real estate activities	1,078	1.5	1,008	1.7	688	1.3
Professional scientific and technical activities	7,526	10.7	6,998	11.8	5,509	10.7
Administrative and support service activities	3,414	4.9	3,131	5.3	2,937	5.7
Public administration and defence; compulsory social security	4,179	6.0	2,639	4.5	2,714	5.3
Education	7,964	11.4	7,212	12.2	4,222	8.2
Human health and social work activities	7,404	10.6	6,058	10.2	5,321	10.4
Arts entertainment and recreation	3,823	5.5	3,332	5.6	3,087	6.0
Undifferentiated goods and services	151	0.2	203	0.3	119	0.2
Activities of extraterritorial organisations and bodies	34	0.0	31	0.1	42	0.1

**Table 2: Key industries by authority area.** Source: Census 2011

Employment Size band	Guildford (total number)	Guildford (as % of total)	Woking (total number)	Woking (as % of total)	Waverley (total number)	Waverley (as % of total)
Total Enterprises	7,105		4,715		7,900	
Micro (0 to 9)	6,360	89.5%	4,215	89.4%	7,200	91.1%
Small (10 to 49)	620	8.7%	385	8.2%	595	7.5%
Medium-sized (50 to 249)	105	1.5%	90	1.9%	95	1.2%
Large (250+)	20	0.3%	25	0.5%	15	0.2%

**Table 3: Business counts by authority area.** Source: Inter Departmental Business Register (ONS) 2015

## 7 Catchment areas of facilities providing cultural and social wellbeing and service market for consumers

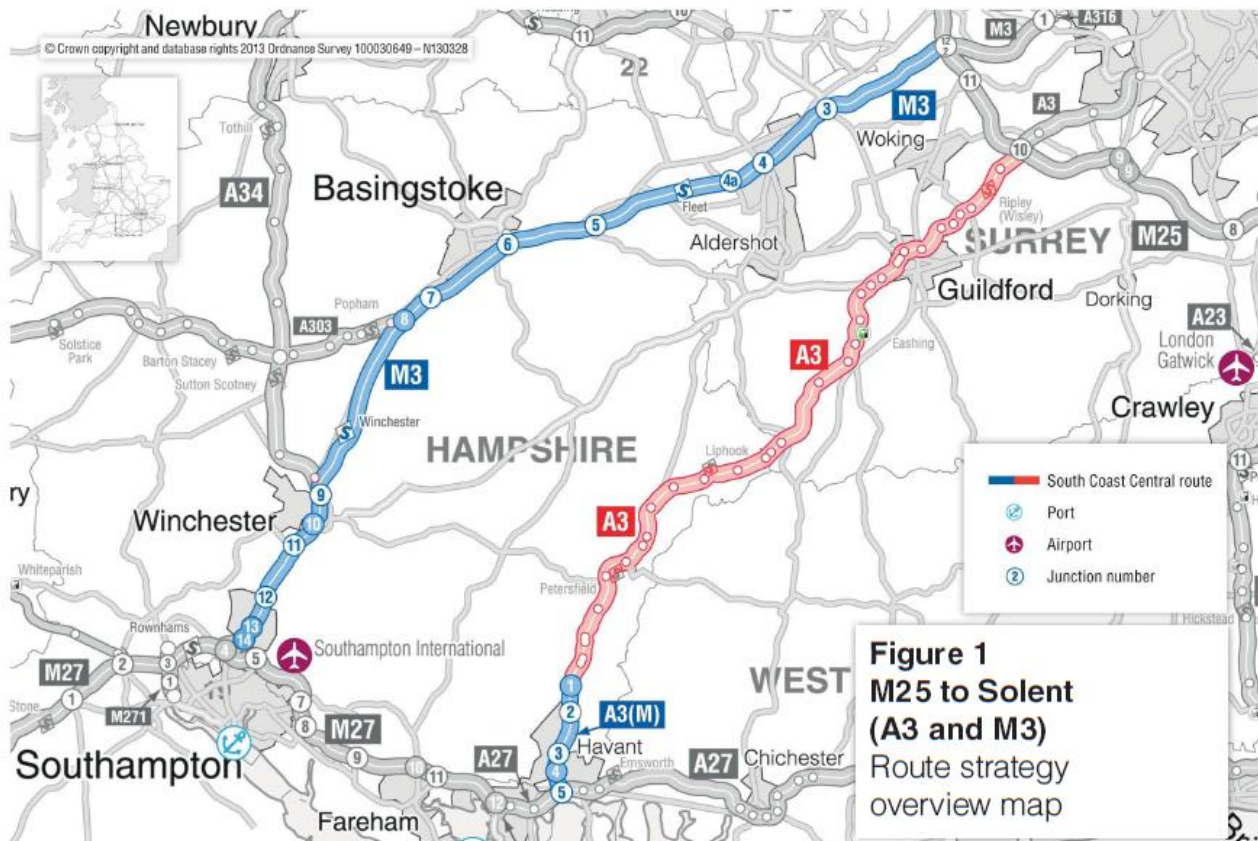
7.1 Guildford Borough Council's Retail and Leisure Study Update 2014 identifies a number of further links between the three authorities. Guildford town centre is considered to have a strong retail

and leisure offer, which has contributed to its status as one of the top 50 shopping centres in the UK, and attracts people to the borough from Woking, Waverley and other nearby local authorities. The report notes that stores in the borough have increased their market share of comparison goods expenditure across the study area (an area which includes Woking, Waverley and large areas of Surrey Heath, Elmbridge, Runnymede, Mole Valley and Horsham) since 2010, whilst the town cinema captures a third of all cinema visits in the same area. However, the draw of the town centre reduces as distance from it increases, as other regional competitors come into play. Woking and Godalming also attract some comparison expenditure from residents in the study area. Links between Guildford, Waverley and Woking are therefore considered to be the strongest.

- 7.2 Woking Borough Council's Town, District and Local Centres Study Report (2009) identifies similar links between the authorities. The report concludes that Guildford and Woking are by far the most popular destinations for visits (from study area residents) to restaurants, cafés, bars, pubs and nightclubs. Guildford is noted as a popular destination for residents wishing to make use of health and fitness, cinema and family entertainment facilities.
- 7.3 The Waverley Town Centre Retail Study update 2013 also highlights significant connections between the borough and Guildford. The document notes that regional centres such as Guildford exert considerable influence over Waverley residents' shopping behaviour, particularly in regards to comparison goods. A large proportion of expenditure on such goods is made within Guildford.
- 7.4 The retail and leisure patterns described within the aforementioned studies highlight a complex web of connections between Local Authorities in Surrey. However, the strongest links appear to be between Guildford, Waverley and Woking; further justifying the boundaries of the FEMA selected.

## **8 Transport Network**

- 8.1 Significant road infrastructure passes through Guildford, Waverley and Woking, making the boroughs highly accessible and an attractive location for both large and small employers. The M25 (London orbital) runs through the north east of the borough of Guildford and east of Woking, providing easy access to London and the wider South East. The M3 motorway also runs to the north of Woking, connecting London and the M25 to the port of Southampton. The A3, which links London to Portsmouth, and the A31, which provides a direct connection between Guildford and Winchester, also pass through large parts of the West Surrey area.
- 8.2 The West Surrey area is also well connected by rail infrastructure, making it an attractive location for London commuters and businesses. London Waterloo can be reached from Woking in 24 minutes, Guildford in 34 minutes and Godalming in 48 minutes. Direct connections are also available from Guildford or Woking to Southampton, Basingstoke, Reading and other towns across Surrey, Berkshire and Hampshire. Residents in Guildford, Woking and Waverley can quickly and conveniently reach the other two boroughs by train.



**Figure 5: West Surrey Road infrastructure.** Source: Highways England M25 to Solent (A3 and M3) route strategy April 2015.

## 9 Cross boundary issues

9.1 The complexity of cross-boundary issues in the region is also recognised. In relation to travel to work areas, the West Surrey SHMA emphasises that there are a:

*“strong set of interactions between Rushmoor, Surrey Heath and Hart. As with migration, the analysis suggests secondary interactions between Rushmoor and Guildford; Woking and Runnymede; and Waverley and East Hampshire. Strong relationships with London are also evident”.*

9.2 Both the 2013 and 2016 Commercial Property Market Studies also identified areas of Waverley and Guildford, including Farnham, Ash, Tongham and Normandy, as falling within the Blackwater Valley market area; demonstrating the strong links between West Surrey and the boroughs of Rushmoor and Hart. There are also secondary links between Guildford and Waverley with Chichester District. Such trends highlight the importance of the duty to cooperate as each local authority continues to prepare their respective Local Plans.

## 10 Conclusion

10.1 We believe that the boroughs of Guildford, Woking and Waverley combined make a logical Functional Economic Market Area. The Functional Economic Market Area will cover all of each authority's administrative area and become known as the West Surrey FEMA. The FEMA has been defined based on a number of key considerations identified in planning practice guidance.

10.2 Whilst the Councils are confident that the boroughs of Guildford, Waverley and Woking form an appropriate FEMA, the complexity of cross-boundary issues in the region is also recognised. In relation to travel to work areas, the West Surrey SHMA emphasises that there are a:

*“strong set of interactions between Rushmoor, Surrey Heath and Hart. As with migration, the analysis suggests secondary interactions between Rushmoor and Guildford; Woking and Runnymede; and Waverley and East Hampshire. Strong relationships with London are also evident”.*

10.3 The 2013 Commercial Property Market Study also identified areas of Waverley and Guildford, including Farnham, Ash, Tongham and Normandy, as falling within the Blackwater Valley market area; demonstrating the strong links between West Surrey and the boroughs of Rushmoor and Hart. There are also secondary links between Guildford and Waverley with Chichester District. Such trends highlight the importance of the duty to cooperate as each local authority continues to prepare their respective Local Plans.

10.4 The boroughs of Guildford, Waverley and Woking all fall within the Enterprise M3 LEP area. The 2013 Commercial Property Market Study produced by the LEP defined a commercial property market area encompassing the whole of the borough of Woking and the majority of the boroughs of Guildford and Waverley. Whilst the 2016 updated study proposes that Woking and Guildford are in different commercial property market areas and recognises that each council has different roles in the market area, various other considerations suggest that the three authorities combined form a suitable FEMA.

10.5 The West Surrey Strategic Housing Market Assessment, published in 2015, was prepared on behalf of Guildford, Waverley and Woking Borough Councils. In line with Planning Practice Guidance, GL Hearn analysed three key data sources (price trends and dynamics, commuting flows and migration patterns) in order to define the extent of the relevant Housing Market Area (HMA). They found a strong set of relationships between the boroughs of Guildford, Waverley and Woking. Following the advice provided in the Planning Advisory Service's Technical Advice Note that on a practical basis it is appropriate to define housing market areas on the basis of local authority boundaries, the SHMA defines the West Surrey HMA as comprising the whole of Guildford, Waverley and Woking boroughs. This was considered sensible given that key demographic data and projections are not published below local authority level.

10.6 The Planning Advisory Service's Technical Advice Note (2015) contains a section on HMAs and economic market areas (para 5.31-5.35). It sets out the expectation that HMAs and economic market areas will be geographically similar because both are largely determined by the link between where people live and work.

- 10.7 When defined the FEMA will be used in the Employment Land Needs Assessment/Employment Land Assessment (ELNA/ELA). The lowest level which the employment projections and floor space data to be used as part of the ELNA are available is at a local authority level. On a practical basis it is therefore sensible to define the FEMA on the lines of local authority boundaries.
- 10.8 An analysis of the local economy, the catchment areas of cultural and social facilities in each of the Local Authorities and the local transport network also illustrates strong links between the boroughs of Guildford, Waverley and Woking. Accordingly, it is considered appropriate to align the FEMA with the West Surrey Housing Market Area.
- 10.9 Whilst the Councils are confident that the boroughs of Guildford, Waverley and Woking form an appropriate FEMA, the complexity of cross-boundary issues in the region is also recognised. Interactions between Guildford and Rushmoor; Woking and Runnymede; and Waverley and East Hampshire are evident along with the region's strong relationship with London. Areas of Waverley and Guildford fall within the Blackwater Valley market area and have close links to other neighbouring authorities including Rushmoor, Surrey Heath and Hart, whilst secondary links between Guildford and Waverley with Chichester District are also recognised. Such trends highlight the importance of the duty to cooperate as each local authority continues to prepare their respective Local Plans.