

Epsom & Ewell Local Plan Annual Monitoring Report 2016 - 2017

Report of the/contact:	Interim Head of Planning, Viv Evans
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	N/A
Annexes/Appendices (attached):	Annexe 1: Local Plan Annual Monitoring Report 2016 – 2017 Annexe 2: AMR Supporting Appendices
Other available papers (not attached):	None Stated

Report summary

The Local Plan Annual Monitoring Report (AMR) assesses the performance of adopted planning policies and tracks the Council's progress against the Local Plan Programme. The Council is required to publish this information on an annual basis.

Recommendation (s)

- (1) That the contents of the Local Plan Annual Monitoring Report be noted and approved for publication on the Council's website; and**
- (2) That future AMRs adopt a streamlined approach, which focusses upon key themes rather than reporting on individual policies and indicators.**

1 Implications for the Council's Key Priorities, Service Plans and Sustainable Community Strategy

- 1.1 The Local Plan provides the spatial planning mechanism for the delivery of the vision which is set out in the Sustainable Community Strategy, and will assist in the achievement of the Council's Key Priorities. Monitoring the performance of our adopted Local Plan policies is an important process that informs the successful development and evolution of an up-to-date and sound local plan.

2 Background

- 2.1 This Annual Monitoring Report (AMR) covers the period from 1 April 2016 to 31 March 2017. It is the twelfth full AMR. The AMR covers the full range of indicators the Council has identified for its Core Strategy; the Plan E Epsom Town Centre Area Action Plan; the Development Management Policies Document; and our Economic Development Strategy.

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2.2 The Local Plan AMR 2016/ 2017 is comprised of the following elements:

- A summary of the housing completions this reporting year (April 2015- March 2016) and completions in the Borough since 2006
- The Housing Trajectory and Housing Land Supply Statement
- A summary of the 'affordable' housing completions this reporting year and future projections.

3 Main Headlines

- 3.1 During the reporting period, the Council published its Strategic Housing Market Assessment (SHMA), which identifies and objectively assessed housing needs figure (OAHN) for the Borough. National planning policy states that in the absence of an up-to-date local plan, local planning authorities must monitor housing delivery against their OAHN figure. This is why Officers have substituted the housing target identified in our Core Strategy (Policy CS7) with the OAHN identified in the Council's SHMA.
- 3.2 The Council has not met its annualised OAHN figure this year. 308 new were delivered, which would have been considered a success against the Council's Core Strategy target.
- 3.3 The requirement to use the Council's OAHN as a de facto housing target has an impact on both the Council's Housing Trajectory and Land Supply Statement. Both show that the Borough does not have sufficient sites, either available or in the pipeline, to demonstrate a five year supply of housing. This is unsurprising given the substantial difference between the Council's Core Strategy target and the OAHN.
- 3.4 Given the Council's current housing land supply strategy, the availability of sites, market conditions and the readiness of the development industry (to build substantial numbers of new homes) there is little that the Council can do to transform its housing trajectory and land supply statement in the short term. Even adopting an approach to permit all new housing development proposals is unlikely to result in a steeper trajectory or significantly increased housing land supply position. The Council can provide a positive response through its Local Plan by adopting a new strategy for growth – one that increases densities and identifies appropriate sites for new housing. Nevertheless, such an approach is unlikely to provide an instant response to our situation – it may still take a couple of AMR reporting cycles to arrive at a positive trajectory and compliant housing land supply position.
- 3.5 The Council has an overall target of 35% of new dwellings to be provided as affordable (Core Strategy Policy CS9). In 2016/2017, 18.5% of all completions were classified as 'affordable housing'. This equated to 57 affordable units. The delivery of affordable housing has proved challenging over recent years. Developers' use of viability assessments

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and the reinstatement of the written ministerial statement restricting the ability to seek contribution from housing developments comprised of 10 units or fewer have had an impact. However, positive action has been taken to address this through the publication of the Position Statement on the Exemption of Small Sites from Development Contributions (approved by the LPPC Committee in December 2017), which clearly sets out the Council's case for continuing to seek such contributions. The existing affordable housing policy will be considered as part of the Core Strategy review to ensure it remains achievable and relevant.

- 3.6 Progress in delivering the objectives and improvements identified within Plan E Epsom Town Centre Area Action Plan during the reporting period has been noteworthy. Funds have successfully been obtained to deliver a number of the highways/environmental improvements identified in Plan E, and the works are currently underway. Retail wise Epsom appears to be performing well with a consistently low vacancy rate. The policies to protect retail frontages are well used, helping to preserve the core retail function of the primary shopping area. Monitoring has highlighted the need to ensure more frequent surveys of shopping frontages/parades to ensure the policies are being correctly implemented.
- 3.7 There has been some progress with regard to the opportunity sites identified in Plan E, with the Comrades Club receiving permission for redevelopment. Activity also occurred in relation to the emergency services site, although there appears to be limited interest from landowners in redeveloping the remainder of the Utilities Site (as allocated under Plan E Policy E15). The Council may need to be more proactive in facilitating the development of such a sustainably located site.
- 3.8 As part of changes to the permitted development regime, introduced in May 2013, changes from B1 office use to C3 residential use are now permissible without consent subject to a prior approval process covering flooding, highways and transport issues and contamination. Evidence demonstrates that this has had a negative impact on the supply and availability of office space, particularly in Epsom Town Centre. The general trend for employment land to be lost to residential uses continues. However, where non PDCOU applications are made, the Plan E policies (alongside the Core strategy and Development Management policies) are ensuring any losses are fully justified. Additionally, the Article 4 direction issued on a number of key office buildings is helping to retain the higher quality office buildings in the town centre.
- 3.9 This is the first AMR to report on the performance of the Council's Development Management Policies. Analysis shows that a number of the policies are particularly well used, although their performance can be challenging to meaningfully monitor.
- 3.10 Well used policies include DM9 Townscape Character and local Distinctiveness and DM10 Design Requirements which are frequently cited in reports. Their performance at appeal is varied due to the very

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subjective nature of design and character. Other well used policies are the more niche policies such as those relating to the Green Belt (DM1 to 4), DM8 Heritage Policy, DM14 Shopfronts and DM19 Flood Risk, which appear to be performing well.

- 3.11 The policies relating to density, space standards and height again are well used, but may need to be reconsidered as part of the Core Strategy review in light of the pressing need for housing land and ensuring its most efficient use. Policy DM16 Backland Development could also fall into this category. While the policy offers a degree of flexibility, as demonstrated by three applications being permitted during the reporting year for development on garden land, it is likely to have prevented a number of applications for such development from coming forward. Again, this is very difficult to monitor.
- 3.12 One policy which appears to not be performing well is DM22 Housing Mix, which requires developments of four or more units to include at least 25% a three bed units or larger. Monitoring shows that this policy requirement is not being met. This appears to be partly due to the number of smaller sites coming forward, but is also heavily influenced by the market which is seeking to deliver smaller units.
- 3.13 Since the introduction of the AMR regime Officers have sought to improve the scale and content of Reports. To both streamline the process of production of the AMR as well to enable the AMR to be more accessible, it is proposed that the AMR for the next reporting period be streamlined, focussing on key themes such as housing delivery and economic development rather than seeking to report on each individual policy and its associated indicator. It is anticipated that this will result in a more meaningful data, which is easier to monitor and analyse. The Core Strategy review, will provide an excellent opportunity to identify key themes for monitoring.

4 Financial and Manpower Implications

- 4.1 There is an ongoing requirement to monitor the performance of our Local Plan policies, to produce the data which is reported annually in the AMR.
- 4.2 Additional staff resources have been secured to ensure that our monitoring regime meets the requirements set out in national planning policy. Up to 5% of monies secured through the Community Infrastructure Levy can be allocated for administration purposes associated with the Levy. We are currently deploying some of this money to help meet our monitoring requirements.
- 4.3 **Chief Finance Officer's comments** *Additional funding from the 5 percent admin fee element of Community Infrastructure Levy receipts was agreed to fund up to £80,000 in total over two years to support the delivery of the Local Plan. Any request for the use of any additional funding will need to be agreed by the Strategy and Resources Committee.*

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5 Legal Implications (including implications for matters relating to equality)

- 5.1 Section 113 of the Localism Act 2011 requires every authority to produce a series of reports containing information on the implementation of the Local Development Scheme and the extent to which the planning policies set out in the Local Plan are being achieved. This enables the effects of a policy to be monitored transparently to enable a plan to respond quickly to changing circumstances and to implement change where a policy may not be working as anticipated.
- 5.2 Provisions of the Town and Country Planning (Local Planning) (England) Regulations 2012, which came into effect on the 6th April 2012, require local planning authorities' monitoring reports to contain key information.
- 5.3 This monitoring information is to be made available to their communities on-line in the AMR. Councils are no longer required to submit the AMR to Government Office.

6 Sustainability Policy and Community Safety Implications

- 6.1 The Local Plan AMR provides a mechanism with which to assess the impact of our planning policies. The planning policies within the Core Strategy, the Plan E Epsom Town Centre Area Action Plan and the Development Management Policies Document have been subject to sustainability appraisal.

7 Partnerships

- 7.1 The Planning Policy Team has worked with a number of internal partner services and departments to ensure that the relevant data is accurate and consistent. These include the Development Management Team, the Finance Department and the Economic Development Officer.

8 Risk Assessment

- 8.1 We are required by government to produce an annual monitoring report reporting on the performance and delivery of our Local Plan.

9 Conclusion and Recommendations

- 9.1 It is recommended that the AMR be approved for publication on the Council's website.
- 9.2 It is recommended that future AMRs adopt a streamlined approach that focusses upon key themes rather than reporting on individual policies and indicators. The Core Strategy review will help to identify the themes.

Ward(s) affected: (All Wards);