

LOCAL PLAN PROGRAMME

Head of Service/Contact: Karol Jakubczyk, Planning Policy Manager
Urgent Decision?(yes/no) No
If yes, reason urgent decision required:
Annexes/Appendices (attached): Draft Local Plan Programme June 2018
Other available papers (not attached): National Planning Policy Framework
Town & Country Planning (Local Planning)
(England) Regulations 2012

Report summary

A new Local Plan Programme has been prepared to set the process and timetable for the new Epsom & Ewell Local Plan.

Recommendation (s)

That subject to the Committee's consideration and any changes that they introduce, the draft Local Plan Programme June 2018 be adopted taking immediate effect and be published on the Borough Council's website.

(1)

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

- 1.1 The delivery and implementation of the Epsom & Ewell Local Plan contributes towards all of the Council's Key Priorities. The new Epsom & Ewell Local Plan is critical because it will set out how sustainable growth, particularly in relation to new housing, will be delivered during the plan period.

2 Background

- 2.1 The purpose of the Local Plan Programme is to set out the processes and timetable for the preparation and production of the Borough Council's Local Plan. We have always envisaged our Programmes providing a rolling three-year project plan - that seeks to inform both the process and all of the interested parties and partners about how and when the Local Plan will be brought forward.

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- 2.2 Progress against the Local Plan milestones identified in the Programme is monitored through our Local Plan Annual Monitoring Report. In the past we have amended and revised our Local Plan programme to take account of circumstances that have brought about a change in our plans. Previous Local Plan Programmes have typically been reviewed after being in place for two years or so. Revisions have normally been triggered by changes in national planning policies, such as the revocation of regional plans and the publication of the NPPF; and consequential changes in our approach to plan-making.
- 2.3 Our last Local Plan Programme was published during July 2017. It was our eighth Programme. At the time of its publication we had thought that we were entering a period of certainty and that the level of risk to our timetable was relatively low. In contrast to previous years the Planning Policy Team was fully staffed and the prospect of government making significant changes to national planning policy appeared unlikely. On that basis, we believed that the timetable set out in the Local Plan Programme July 2017 would remain current for some time. We were confident that we would be able to make good progress against the objectives included within that Programme.
- 2.4 However, our expectations have not been met and the Local Plan Programme is now out-of-date. Whilst the adopted Local Plan Programme had been on-target until March/ April 2018, the critical milestone of pre-submission consultation has now passed.
- 2.5 The analysis of responses to our Issues & Options Consultation has revealed that meeting either our original SHMA objectively assessed housing needs figure or the Government's standard methodology calculation will be challenging. There are simply not enough deliverable and developable sites available to meet either level of projected housing need within the confines of the Local Plan period. It is important that we respond positively to this issue to ensure that we can submit a plan that can be found sound.
- 2.6 Furthermore, the proposed changes to the national planning policy framework merit further consideration prior to the publication of a pre-submission draft. This is particularly important in relation to the changes relating to housing delivery, development viability and cross-boundary planning.
- 2.7 In order to respond positively to these matters a new draft Local Plan Programme has been prepared, which takes account of our available resources, the changes to national planning policy and the anticipated scale of future housing need. We are confident that the new draft Programme will help us meet our ambitions. A draft version is included under Annexe 1.

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3 Local Plan Programme

- 3.1 The draft Local Plan Programme builds upon the July 2017 document. It sets out a timetable for the preparation, production and consultation of the new Plan and associated supporting evidence. The timetable identifies key milestones during document production. We will use these milestones to monitor the performance of our Programme.
- 3.2 The timetable remains ambitious, seeking continuous progress during the second half of 2018 and the first half of 2019. Our success will rely upon a proportionate deployment of resource; in terms of internal staff, external expertise where necessary and financial support. The adoption and delivery of this timetable will help us reduce the risk of government intervention and unsustainable speculative approaches seeking the development of sites in unsustainable locations. Critically it ensures that we set the Borough's housing strategy.
- 3.3 The key milestones over the next twelve months are those associated with the preparation of the new Local Plan's Housing Strategy, which will set out how and where we will deliver new homes. That process will be supported and informed a series of new technical documents; including the Borough-wide Masterplan and the strategic viability assessment. The Local Plan Programme identifies when we these documents will come before this Committee for consideration.
- 3.4 Given the scale of future growth anticipated by the government's standard methodology and the amount of additional evidence required we believe that the Pre-Submission Draft Local Plan could be ready to come before this Committee during September 2019. The first opportunity for pre-submission consultation would be during October 2019, with submission following during December 2019.

4 Financial and Manpower Implications

- 4.1 The preparation and implementation of the Council's local plan imposes significant demands on staff in the Planning Policy Team and the wider Planning Department. The recruitment of a new Senior Planning Policy Officer is proceeding positively. It is anticipated that the new post-holder will make a valuable contribution towards meeting the milestones set out in the new Programme.
- 4.2 However, it may prove necessary to deploy other corporate resources, such as the Communications Team and/ or Senior Officers of the Borough Council, in order to maintain progress. Contributions from these sources may be particularly sought during the public consultation and Duty-to-Cooperate stages of the process, when their input can be best deployed.
- 4.3 **Chief Finance Officer's comments:** None for the purpose of this report

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

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5.1 All statutory Local Plan documents are subject to public examination. Our “Your Involvement in Planning” document addresses those equality issues related to consultation and engagement.

5.2 ***Monitoring Officer’s comments: None arising from the contents of the report***

6 Sustainability Policy and Community Safety Implications

6.1 The new Local Plan will contribute towards delivering our objectives for maintaining and enhancing the Borough as a sustainable place to live, work and visit by providing guidance to new development proposals.

6.2 A Sustainability Appraisal of the policy options will form an integral part of the plan-making process. The Sustainability Appraisal Report will be subject to public consultation at an appropriate point in the process.

7 Partnerships

7.1 The Localism Act and national planning policy state that public bodies have a duty-to-cooperate on planning issues that cross administrative boundaries. We will seek to meet this duty by working collaboratively with our partners in neighbouring boroughs and districts on issues of common interest. Potential partners in this process may include neighbouring local planning authorities; more distant authorities that either are or may become connected to our housing market in the future, the County Council and other strategic infrastructure providers.

7.2 This is a continuous and evolving process that will help guide future policy development. Where it is necessary and appropriate we will seek the active involvement of the Committee in order to secure agreement on strategic cross-boundary issues.

8 Risk Assessment

8.1 In the absence of an up-to-date Local Plan we face a number of risk areas. These include the absence of a 5 year housing land supply; the additional pressure on housing need arising from the new Housing Delivery Test; and the absence of strategic co-operation with neighbouring planning authorities. Should we fail to respond to these factors we could face direct intervention by the Secretary of State.

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- 8.2 Having an up-to-date Local Plan Programme is a key measure in mitigating the possible risk of direct government intervention. In our case, we have made good progress against the previous Programme and we are now seeking to respond positively to our objectively assessed housing need¹. A key part of our response is to set out a realistic and deliverable timetable for the remainder of the process.
- 8.3 We are not alone in having to respond to this situation. Many local planning authorities in the South East of England face similar risks associated with changes in national policy. We are seeking to manage these risks through a number of channels. We have already introduced new approaches to housing delivery that seek to optimise the number of new homes coming forward. For example, our new policy approach towards the consideration of development proposals involving higher housing densities and taller residential buildings.
- 8.4 The other notable risk to our Local Plan Programme is the retention of experienced staff, and the recruitment of their replacements. The Planning Policy Team is small and resilience has been a longstanding issue. The loss of one or more experienced members of this Team will have implications for the Local Plan timetable. Recent experiences demonstrate that recruiting new staff, regardless of their experience, may prove challenging. Retaining the existing Team complement is strongly encouraged.

9 Conclusion and Recommendations

- 9.1 The Committee are asked to consider the draft Local Plan Programme and subject to any additions or amendments agree to its publication and implementation.

Ward(s) affected: (All Wards);

¹ For the purposes of this report it is assumed that Borough Council will need to respond to the government's standard methodology. It is anticipated that the government will publish the new National Planning Policy Framework during July 2018.