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Democratic Services



LICENSING AND PLANNING POLICY COMMITTEE

Thursday 15 June 2023 at 7.45 pm

Place: Council Chamber, Epsom Town Hall

Link for public online access to this meeting:
Council Chamber - Epsom Town Hall,
<https://www.youtube.com/@epsomandewellBC/playlists>

The members listed below are summoned to attend the Licensing and Planning Policy Committee meeting, on the day and at the time and place stated, to consider the business set out in this agenda.

Councillor Steven McCormick (Chair)
Councillor Peter O'Donovan (Vice-Chair)
Councillor Steve Bridger
Councillor Shanice Goldman

Councillor Julie Morris
Councillor Phil Neale
Councillor Kieran Persand
Councillor Clive Woodbridge

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sing'.

Chief Executive

For further information, please contact Democratic Services, email: democraticservices@epsom-ewell.gov.uk or tel: 01372 732000

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- You should proceed calmly; do not run and do not use the lifts;
- Do not stop to collect personal belongings;
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- Do not re-enter the building until told that it is safe to do so.

Public information

Please note that this meeting will be held at the Town Hall, Epsom and will be available to observe live on the internet

This meeting will be open to the press and public to attend as an observer using free GoToWebinar software, or by telephone.

A link to the online address for this meeting is provided on the first page of this agenda and on the Council's website. A telephone connection number is also provided on the front page of this agenda as a way to observe the meeting, and will relay the full audio from the meeting as an alternative to online connection. A limited number of seats will also be available in the public gallery at the Town Hall. For further information please contact Democratic Services, email: democraticservices@epsom-ewell.gov.uk, telephone: 01372 732000.

Information about the terms of reference and membership of this Committee are available on the [Council's website](#). The website also provides copies of agendas, reports and minutes.

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Exclusion of the Press and the Public

There are no matters scheduled to be discussed at this meeting that would appear to disclose confidential or exempt information under the provisions Schedule 12A of the Local Government (Access to Information) Act 1985. Should any such matters arise during the course of discussion of the below items or should the Chairman agree to discuss any other such matters on the grounds of urgency, the Committee will wish to resolve to exclude the press and public by virtue of the private nature of the business to be transacted.

Questions from the Public

Questions from the public are permitted at meetings of this Committee. Any person wishing to ask a question at a meeting of this Committee must register to do so, as set out below.

Up to 30 minutes will be set aside for written or oral questions from any member of the public who lives, works, attends an educational establishment or owns or leases land in the Borough on matters within the Terms of Reference of the Licensing and Planning Policy Committee which may not include matters listed on a Committee Agenda.

All questions whether written or oral must consist of one question only, they cannot consist of multi parts or of a statement.

The question or topic may not relate to a specific planning application or decision under the Planning Acts, a specific application for a licence or permit of any kind, the personal affairs of an individual, or a matter which is exempt from disclosure or confidential under the Local Government Act 1972. Questions which in the view of the Chairman are vexatious or frivolous will not be accepted.

To register to ask a question at a meeting of this Committee, please contact Democratic Services, email: democraticservices@epsom-ewell.gov.uk, telephone: 01372 732000.

Written questions must be received by Democratic Services by noon on the tenth working day before the day of the meeting. For this meeting this is **Noon, 1 June 2023**

Registration for oral questions is open until noon on the second working day before the day of the meeting. For this meeting this is **Noon, 13 June 2023**

AGENDA

1. QUESTION AND STATEMENTS FROM THE PUBLIC

To take any questions or statements from members of the Public.

2. DECLARATIONS OF INTEREST

Members are asked to declare the existence and nature of any Disclosable Pecuniary Interests in respect of any item of business to be considered at the meeting.

3. MINUTES OF THE PREVIOUS MEETING (Pages 5 - 8)

The Committee is asked to confirm as a true record the Minutes of the Meeting of the Committee held on **30 January 2023** (attached) and to authorise the Chair to sign them.

4. TAXI AND PRIVATE HIRE EMISSIONS POLICY (Pages 9 - 22)

The Committee are asked to agree in principle the proposal for amending the Hackney Carriage and Private Hire Licensing Policy and to authorise public consultation.

5. PLANNING FEE INCOME REPORT (Pages 23 - 28)

The report identifies the adverse variance in planning-related fees for the financial year 2022/23 and outlines measures to address reduced forecast planning income and mitigation options.

6. LOCAL PLAN UPDATE (Pages 29 - 60)

Public consultation on the Draft Local Plan (2022-2040) was undertaken between 1 February 2023 and 19 March 2023. Following the closure of the public consultation an extraordinary Council meeting was held on the 22 March 2023 where the decision was made to pause the Local Plan to enable specified tasks to be undertaken.

This report provides an update on the work undertaken following the decision on the 22 March by Council and makes recommendations on the work that can progress prior to a decision being made at a future committee on a revised timetable for producing the Local Plan.

**Minutes of the Meeting of the LICENSING AND PLANNING POLICY COMMITTEE
held at the Council Chamber, Epsom Town Hall on 30 January 2023**

PRESENT -

Councillor Steven McCormick (Chair); Councillor Peter O'Donovan (Vice-Chair); Councillors Steve Bridger, Neil Dallen, Liz Frost, Rob Geleit, Julie Morris, Barry Nash, Phil Neale, and Peter Webb

In Attendance: Councillor Kate Chinn

Officers present: Victoria Potts (Interim Director of Environment, Housing and Regeneration), Ian Mawer (Planning Policy Manager), Harry Burchill (Senior Planning Policy Officer), Sue Emmons (Chief Accountant), Susie Legg (Policy Planner), Tim Richardson (Democratic Services Manager) and Stephanie Gray (Data Protection Officer)

28 QUESTION TIME

The Committee received three oral questions from members of the public. An oral response was provided to each question.

Three supplementary oral questions were asked. The Chair, the Interim Director of Environment, Housing and Regeneration, and the Planning Policy Manager provided oral responses to these questions.

29 DECLARATIONS OF INTEREST

No declarations of any Disclosable Pecuniary Interests in respect of any item of business to be considered at the meeting were made by Members.

30 MOTION REFERRED FROM COUNCIL

The Committee received a report which provided a basis for debate to the motion submitted to the meeting of Full Council on 06-12-2022 by the Labour Group about the Council's affordable housing specified in the new Local Plan.

The following matters were considered by the Committee:

- a) **Viability assessment:** Officers confirmed that any viability assessment submitted by a developer, would be subject to an independent check. This check would be commissioned by the Council, with costs to be borne by the developer.

- b) **Homelessness:** Members considered that homelessness was one of the biggest risks faced by the Council, but that Council also needed to be realistic regarding the calls on its purse.

Following consideration, it was resolved (6 voting in favour, 2 voting against, 1 abstention, and the Chair not voting) to:

- (1) Reject the motion as Local Plan Policy must be evidence based and as such the draft Local Plan provides a robust and more refined approach to maximise the delivery of affordable housing across both brownfield and greenfield sites.**

31 EPSOM AND EWELL LOCAL PLAN 2022-2040

The Committee received a report seeking approval to publish the Draft Local Plan (2022-2040) for public consultation for a period of six weeks commencing on the 1st February 2023 in accordance with our adopted Local Development Scheme (the Local Plan timetable).

This is the first stage of public consultation as the Local Plan progresses towards adoption.

The following matters were considered by the Committee:

- a) **Local Plan Made easy Guide and Frequently Asked Questions (FAQ) document:** Officers confirmed that the FAQ document will be a living document on the website which will be added to as the consultation period unfolds.
- b) **Process leading up to Local Plan:** the Chair confirmed that a robust process had taken place in terms of preparation, member briefings and discussions, in the lead up to the production of the Local Plan.
- c) **Social responsibility to provide housing:** A Councillor asked about the Council's social responsibility to provide housing. It was explained that as a housing authority, we regularly assess the housing need, and look to meet these needs.
- d) **Health and Wellbeing:** a Councillor expressed a concern that if Epsom is becoming an aging population, it was important that sufficient provision is made for spaces for independent as well as team sports, and that there may be more of a call for appropriate outdoor spaces for such activities. Officers confirmed that there was some evidence base relating to formal sports pitches as well as regarding the provision of more secure spaces. It was pointed out that Epsom is very fortunate to have such extensive outdoor space available, and the Local Plan will look to improve the linkages and connectivity to these open spaces.

- e) **Call for Sites:** A Councillor asked whether if additional sites were identified through the Call for Sites process, this could possibly mitigate against the use of certain green belt sites. An Officer confirmed that this could well be the case, although there were other needs that also need to be met (not just the housing need).
- f) **Amendments to Local Plan:** it was indicated that the Local Plan would be published “as is”, although a schedule of amendments would be drawn up and Members were invited to email any amendments through to Officers.
- g) **Comments received during Consultation period:** Officers explained that following the Consultation period, all comments received would be incorporated into a Statement of Consultation. This Statement would also document how the comments have been addressed. The Statement would also be brought back to the Committee.
- h) **Methods for public to comment on Local Plan:** Officers explained that there were various methods available to the public to comment on the Local Plan. The preferred method was to comment using the consultation software which enabled comments to be made online at relevant places in the Plan. Other methods to comment include writing a letter or sending an email. Along with being available online, hard copies of the Plan will also be available in the Town Hall and in libraries. A pdf version of the Plan will also be available. Members of the public would also be able to fill out a Comment Form. Anonymous comments will not be accepted.

Following consideration, it was unanimously resolved to:

- (1) **Approve the publication of the Draft Local Plan (2022-2040) for public consultation to commence 1 February 2023 at noon and conclude on 15 March 2023 at midnight.**

32 REVENUE BUDGET 2023/24

The Committee received a report setting out budget estimates for income and expenditure for Licensing & Planning Policy services in 2023/24.

Following consideration, it was resolved to:

- (1) **recommend the 2023/24 service estimates for approval at the budget meeting of full Council in February 2023.**

The meeting began at 7.30 pm and ended at 9.29 pm

COUNCILLOR STEVEN MCCORMICK (CHAIR)

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HACKNEY CARRIAGE AND PRIVATE HIRE EMISSIONS POLICY

Head of Service:	Rod Brown, Head of Housing & Community
Wards affected:	(All Wards);
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	
Appendices (attached):	Appendix 1 Proposed wording for consultation

Summary

The Committee are asked to agree in principle the proposal for amending the Hackney Carriage and Private Hire Licensing Policy and to authorise public consultation.

Recommendation (s)

The Committee is asked to:

- (1) Agree in principle the proposal for amending the Hackney Carriage and Private Hire Licensing Policy to phase in a requirement that licensed vehicles meet the same emissions requirements as the London Ultra-Low Emissions Zone, as set out in section 8 of this report.**
- (2) Agree the policy be subject to public consultation with the results of the consultation and any policy modifications being brought back to the Committee prior to recommendation to full Council for adoption.**

1 Reason for Recommendation

- 1.1 On 27 October it was considered by the Committee that a report on hackney carriage ('HC') and private hire vehicle ('PHV') emissions as a matter of high priority be brought to a meeting of the Committee, following public consultation and the consideration of the Climate Change Working Group.
- 1.2 Initial engagement work with members of the trade and the Climate Change Working Group has been completed and a set of proposals to be consulted on have been drafted. Agreement is sought to formally consult on the proposals with all licence holders and the public.

- 1.3 It had been intended to obtain agreement from the Committee on 30th March 2023 so as to comply with the intention of the Committee that this matter be treated as a high priority. However, the Council's Monitoring Officer recommended the report and consultation be delayed until after the election as the subject matter was potentially a sensitive topic that should not be allowed to interfere with the pre-election period.

2 Background

- 2.1 There are many similarities in the how HC and PHV work, however there are also important differences. The key differences between the vehicles is that a PHV, unlike a taxi, cannot ply for hire, which means that all journeys must be pre-booked in advance through a licensed operator. Locally licensed HC can be immediately hired and can be found at the hackney carriage stands around Epsom and they can be hailed in the street.
- 2.2 The purpose of the licensing of HC and PHV is to protect the public. In licensing vehicles and their drivers we seek to ensure a safe and reliable service for the public, providing confidence to residents, businesses and visitors to the borough.
- 2.3 On the 23 July 2019 Epsom & Ewell Borough Council committed to tackling Climate Change and addressing carbon emissions. Controlling the emissions of vehicles licensed in the borough is reasonable in this context, however, this must be balanced against the need to ensure licensed vehicles remain readily accessible to all service users.
- 2.4 Any significant reduction in supply of licensed vehicles and drivers could result in the increased risk of the public using unlicensed and unvetted vehicles and drivers, or using vehicles and drivers licensed remotely that this Licensing Authority has no control over. Those intending to visit the town centre at night might be put off visiting if they can not be confident of being able to get home at night, and wheelchair users will be marginalised if wheelchair accessible vehicles are not easily available.

3 Measuring Emissions

- 3.1 When considering the likely impact on air quality of a vehicle the simplest measure is their Euro Standard. Since 1992, European Union regulations have been imposed on new cars, with the aim of improving air quality.
- 3.2 This means a vehicle has to meet a certain Euro emissions standard when it is made.
- Euro 4- car newly registered from 1 January 2006
 - Euro 5- car newly registered from 1 January 2011
 - Euro 6- car newly registered from 1 September 2015

- 3.3 Because petrol and diesel engines produce different types of emissions, they are subject to different standards.
- 3.4 Diesel vehicles are considered more polluting than the equivalent petrol car, particularly with respect to the increased levels of nitrogen dioxide and the fine particulate matter they produce. It is based on this rationale that the Transport for London's ('TFL') London Ultra Low Emissions Zone ('ULEZ') require petrol vehicles to be Euro Category 4 compliant, whilst diesel vehicles have to be Euro Category 6 compliant.
- 3.5 Beyond the Euro emissions categories vehicles can be classed as Zero and Ultra Low Emission Vehicles ('ULEV'). ULEVs are currently defined as having less than 75 grams of CO₂ per kilometre (g/km) from the tail pipe. There are currently no ULEV purpose-built taxis available.
- 3.6 Zero Emission Capable ('ZEC') vehicles are defined as being capable of being operated with no (zero) exhaust emissions for a minimum range (defined by TFL as 10 miles).

4 Current position in EEBC

- 4.1 Currently EEBC's licensing policy only specifies an emissions limit with respect to hackney carriages; -

'All hackney carriages which are being presented for first licensing by the Authority should be Euro 5 compliant. An exception is made for vehicle proprietors who have held a Hackney Carriage Vehicle Licence issued by the Authority prior to January 2013, who are entitled to renew/transfer their vehicle to a Euro 4 standard vehicle.'

The exception provided to holders of a licence issued prior to January 2013 effectively means that all HC can be licensed if they meet the Euro 4 standard.

- 4.2 EEBC do not have an emissions policy with respect to PHV however it does have a maximum age policy for new private hire vehicles.

'All private hire vehicles which are being presented for first licensing by the Authority may be no older than six years old as of the date of application. An exception may be made for older vehicles if considered by an Authorised Officer to be in exceptional condition i.e., bodywork which is in immaculate condition, with a full service history and no advisories.'

In practice the exemption criteria has been extended to include vehicles that have been specially adapted to carry wheelchairs.

- 4.3 EEBC currently charges a reduced licence fee for the licensing of hybrids/all Electric vehicles (£250 compared with the usual £320)

- 4.4 By using the vehicle registration number as a guide to the year the vehicle was registered, it is possible to estimate the following breakdown of EEBC licensed vehicles:

	Total number	Euro 6	Euro 5	Euro 4
PHV	723	310 (43%)	232 (32%)	181 (25%)
HC	35	5 (14%)	12 (34%)	18 (51%)

- 4.5 As a legacy of hackney carriages in the borough previously being licensed under the metropolitan authority, all current hackneys are required to be London-style cabs, and these run entirely on diesel (bar one ZEC taxi that has been licensed).
- 4.6 The London-style HC are all wheelchair accessible vehicles ('WAV'), so currently 100% of our licensed HC's are WAV.
- 4.7 It is not possible to specify the number of PHV that are petrol or diesel as this information is not recorded.
- 4.8 EEBC has a disproportional high number of licensed PHVs when compared to other boroughs of a similar size. This is as a result of the Council's progressive decision to issue restricted 'school run only' licences. This has also resulted in a disproportionately high number of PHV being licensed that are wheelchair accessible – at least 220 of the 723 PHV are WAV (30%).

5 Current challenges facing the trade

- 5.1 Whilst the cost-of-living crisis is effecting all areas of the economy, there are additional factors that creating particular challenges for locally licensed trade members, especially hackney carriage owners and their drivers. This is evident in the number of licensed HC declining steeply in recent years - in 2019 there were 74 licensed HC, and currently there are only 35. Contributing factors in this decline may include -
- Increased competition from out of area mobile platform operators.
 - The covid lockdowns and absence of financial support to taxi drivers.
 - The continuing reduction in commuter numbers resulting from changes in working patterns (EEBC HC rely heavily on commuters using the taxis standing outside the station for short journeys and are less likely to be hailed in the street or used for longer journeys than their TFL licensed equivalent).

- The local requirement to licence purpose-built taxis, that are considerably more expensive than other vehicles, when potential EEBC HC earnings are not comparable with their high annual mileage TFL equivalents.

5.2 It has been widely reported that current problems with importing vehicles and parts from Europe has caused a restricted supply of vehicles for sale, with resultant delays in orders of new vehicles and prices increases for all vehicles. It has further been reported that these supply problems are more acute with respect to vehicles that are specially modified to carry wheelchair users, as this was already a limited market before the current problems developed.

5.3 Reduced earnings combined with increased cars prices will make the purchase of newer, cleaner vehicles more difficult. Drivers approaching or considering retirement may decide the purchase of a new vehicle is not viable. Again, this this problem may be felt more acutely amongst the HC trade due to their age demographic range (approx. 24% of EEBC HC drivers are aged 65+, 33% are aged 60-64).

6 Comparison of age and emission standards with other local licensing authorities

6.1 A table summarising the policies of TFL and Surrey authorities with respect to age limits and emissions limits when licensing vehicles is produced below; -

Licensing Authority	Age	Emissions
Transport for London	Vehicle must be no older than 10 years (PHV) or 15 years (HC) at time of re-licensing	All new licensed vehicle must be Zero Emissions Capable. New HC cannot be diesel.
Guildford and Surrey Heath	New vehicles must be less than 5 years old, on renewal must not be 10 years+	All new vehicles must be Euro category 6 min, from January 2025 renewal vehicles must meet Euro 6 category. From Jan 2030 all licensed vehicles must be ULEV.
Elmbridge	No age limit	All new HC cannot be diesel. From Jan 2025 will not licence any diesel vehicle, and all petrol vehicles must be Euro 6 compliant
Waverley	New vehicles must be under 4 years old. From Jan 2024 renewal vehicle	From Jan 2024 New vehicles must be ULEV, from 2031 all vehicles must be ULEV

	must be less than 10 years old.	
Woking	Maximum 12 years old	Euro 6
Spelthorne	Maximum 10 years old	No emissions limit
Reigate & Banstead	Maximum 7 years old (9 for WAV)	No emissions limit
Mole Valley	New vehicles maximum 6 years old, renewal vehicles maximum 9 years old	No emissions limit
Epsom & Ewell	PHV new must be under 6 years old.	New HC must be Euro 5 compliant
Runnymede and Tandridge	No age limit	No emissions limit

- 6.2 Whilst commonplace, the setting of maximum age limits for the licensing of vehicles can appear arbitrary provided the vehicles meet the latest euro emissions category. It is perfectly possible for an older vehicle to be maintained in good condition. Having a maximum age limit can create an unnecessary restriction on access to the trade, and it is submitted that setting a minimum euro emissions standard is a better method of ensuring suitable vehicles are licensed.
- 6.3 TFL has imposed a requirement that new licensed vehicles must be Zero Emissions Capable. Through our initial engagement with the trade, we received anecdotal information that due to a lack of charging infrastructure ZEC vehicles in practice mostly drive using their traditional fuel engines. This results in the vehicles being less efficient when compared to a standard Euro 6 vehicle, as they are transporting an unused alternative propulsion system within the bonnet.
- 6.4 Guildford, Surrey Heath and Waverley Councils have specified a timeframe for moving to the licensing of ULEV only vehicles. Within EEBC there are currently no ULEV licensed, and the appeal/viability of these operating locally is unknown. It is submitted that the licensing of these vehicles should be encouraged so that advocates for their benefits and wider adoption can develop before a mandatory licensing requirement is imposed.
- 6.5 Effecting all road users in the London area, the ULEZ is expanding from 29 August 2023 to cover all Greater London. Anyone driving a vehicle within the ULEZ that does not meet the emission standards (euro 4 min. standard for petrol, euro 6 for diesel) could face a daily charge of £12.50. Private hire operators and hackney carriage drivers of vehicle that did not meet the ULEZ standard would be entitled to pass the additional charge onto the customer.

7 Conclusions

- 7.1 There is not a consistent approach to restricting emissions in licensed vehicles across Surrey and London.
- 7.2 The current EEBC licensing policy allows the continued licensing of polluting Euro 4 and 5 diesel vehicles, and the licensing of these vehicles should be phased out. The removal of the most polluting Euro 4 diesel vehicles from licensed fleet should be the priority. Engagement with the trade has shown some support for this phased approach.
- 7.3 In the absence of any scrappage scheme or grants to support the trade, the enforced rapid replacement of Euro 4 and 5 diesel vehicles would likely have a significant impact on the availability of licensed vehicles if the imposition of this requirement was too hastily applied, with potentially serious impact on public safety.
- 7.4 The expansion of the ULEZ to roads areas adjacent to Epsom & Ewell borough will indirectly affect some licensed drivers, however initial engagement with the trade has not established that this in itself will sufficiently motivate owners of Euro Standard 4 and 5 diesel vehicles to replace them.
- 7.5 The advantage of setting an emissions policy for licensed vehicles that matches the general emissions policy for vehicles entering the ULEZ is that it is clear, well-advertised and consistent. On the TFL website it is possible to quickly [check whether your vehicle meets the ULEZ requirements](#) by simply entering the registration number.
- 7.6 In order to protect access to transport for wheelchair users any changes in policy should include consideration of an exemption for WAV.
- 7.7 It is recommended that steps should be taken to promote the licensing of ULEV, particularly with respect to hackney carriages. It should be considered whether all restriction on specification (including that the requirement the vehicle should be WAV) should be removed for a limited number of vehicles in order to promote their use while industry catches up with the production of reasonably priced fully electric wheelchair accessible vehicles. Any proposed reduction in the number of WAV will require an Equalities Impact Assessment.
- 7.8 To support the hackney carriage trade through the transition to less polluting vehicles, the requirements for all hackneys to be London style cabs should be reviewed.

8 Recommendation

8.1 Following engagement with members of the trade and the Climate Change Working Group, it is proposed to consult on the following changes to the licensing policy

1. EEBC will phase in a requirement that all licensed private hire and hackney carriages meet or exceed the same emissions standards as set by the Ultra-Low Emissions Zone as follows; -
 - a) From 1 January 2024 licences will normally only be granted to vehicles being licensed for the first time that meet the TFL Ultra Low Emission Zone requirements (Petrol: Euro 4 (NOx) Diesel: Euro 6 (NOx and PM). This policy will apply to vehicles replacing existing licensed vehicles. The requirement that new private hire vehicle must be under 6 years old unless in exceptional condition will remain.
 - b) From 1 July 2024 licences will not normally be renewed in respect of any licensed diesel vehicle that does not meet or exceed Euro 5 emission standards (Euro 5 compliant being registered on or after 1 January 2011).
 - c) From 1 July 2025, licences will normally only be granted to vehicles (including renewal of existing licences) that meet the TFL Ultra Low Emission Zone requirements (Petrol: Euro 4 (NOx) Diesel: Euro 6 (NOx and PM).
2. EEBC will provide an exception to the emissions requirements for the licensing of vehicles that have been specially adapted [i.e., post manufacture] to carry wheelchair users.
3. The EEBC requirement that new hackney carriages be purpose built/London style 'black' cabs will be removed. It will remain a requirement that hackney carriages must be wheelchair accessible. To help with the identification of these new vehicles as hackney carriages they will be required to display an illuminated roof box displaying "Taxi - licensed by Epsom & Ewell Borough Council"
4. EEBC will licence up to 5 electric hackney carriages that will be exempt from the requirement to be wheelchair accessible.

8.2 It is proposed the public consultation will be run for 6 weeks with details published on the Consultations page of the Councils website. Licence holders will be written to inviting comment, and there will be a press release supported by social media messaging. The proposed text to be used as part of the consultation is attached at Appendix 1.

9 Timeline for Implementation

- 15 June LPPC to agree to the consultation
- 19 June consultation opens for 6 weeks
- 30 July consultation closes
- 26 September LPPC to receive report on outcome of the consultation and agree any amendments)
- 12 December Council to adopt the changes to policy
- 1 January 2024 earliest practical start date for phased introduction of licensed vehicle emissions policy, if agreed.

10 Risk Assessment

Legal or other duties

10.1.1 Equality Impact Assessment: The proposal to encourage the take up of electric hackney carriages by allowing 5 non-WAV will require an equalities impact assessment to be completed after the consultation responses have been received.

10.1.2 The proposal is to strictly limit the number of non-WAV hackney carriages is intended to ensure minimal impact on wheelchair users. The proposal to remove the requirement for London style cabs may be of benefit to wheelchair users, as it would allow a more diverse fleet of WAV, possibly including vehicles with electric ramps that can more easily accommodate the larger heavy wheelchair.

10.2 Crime & Disorder

10.2.1 If hackney carriage numbers reduced significantly as a result of a revised policy on emissions this could result in users of the night-time economy not being able to immediately hire a vehicle, increasing the risk that a vehicle not licensed locally could be used.

10.3 Safeguarding

10.3.1 None identified

10.4 Dependencies

10.4.1 None identified

10.5 Other

10.5.1 None identified

11 Financial Implications

- 11.1 Owners of vehicles that do not meet the proposed requirements may licence a new vehicle ahead of schedule, bringing forward the related licence fee, or may decide not to renew their licence. Electric or hybrid vehicles pay a lower licence fee, and increased applications for these vehicles may eventually result in lower total licence fees being collected. Should the emissions proposals become policy licence fee recovery would need to be kept under review, however it is likely the impact of these changes will be negligible.
- 11.2 **Section 151 Officer's comments:** Finance officers will work alongside Licensing colleagues to monitor income from taxi licensing.

12 Legal Implications

- 12.1 The Local Government (Miscellaneous Provisions) Act 1976 allows any person aggrieved by conditions imposed on a licence granted to them, a right of appeal under sections 47(3) for Hackney Carriages, and s48(7) for Private Hire Vehicles. Sections 48 and 60 of the same Act provides an appeal against the refusal to renew a vehicle licence.
- 12.2 **Legal Officer's comments:** The legal implications are contained in the body of this report.

13 Policies, Plans & Partnerships

- 13.1 **Council's Key Priorities:** The following Key Priorities are engaged:
- 13.1.1 Green & Vibrant: If implemented the proposal will help reduce the impact of licensed vehicle on the environment.
- 13.1.2 Safe & Well: If implemented the proposal will help improve the air quality for residents and visitors to the borough.
- 13.2 **Service Plans:** The matter is included within the current Service Delivery Plan.
- 13.3 **Climate & Environmental Impact of recommendations:** If implemented the proposal aim is to benefit the climate and local environment.
- 13.4 **Sustainability Policy & Community Safety Implications:** If implemented the proposal would increase the use of vehicles that were less impactful on the environment. If access to suitable licensed vehicles (e.g., WAV) reduced significantly as a result of a revised policy on emissions this could increase the risk that a vehicle not licensed locally could be used, or access to services by vulnerable people reduced.
- 13.5 **Partnerships:** None identified

14 Background papers

14.1 The documents referred to in compiling this report are as follows:

Previous reports:

- [Licensing and Planning Policy Committee - Thursday, 27th October, 2022 7.30 pm](#)

Other papers: None

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Proposed wording to appear on the Council's 'Consultations' webpage

Consultation on Taxi and Private Hire Proposed Emissions Policy

Epsom & Ewell Borough Council has committed to tackling Climate Change and reducing pollution in the Borough, and is proposing to phase in a requirement that all licensed private hire and hackney carriages licensed in the borough meet or exceed the same emissions standards as set by the London Ultra-Low Emissions Zone.

To assist the trade with the cost of transitioning to greener vehicles it is further proposed to remove the requirement for all hackney carriages to be purpose build taxis. It is proposed it will remain a requirement that all hackney carriage are wheelchair accessible, except for a very limited number of hackney carriages that will zero emissions (e.g. electric), so as to encourage the use of these vehicles until suitable zero emissions wheelchair accessible vehicles are available.

Epsom & Ewell Borough Council wants to hear what the licensed trade, residents and local organisations think about the proposals. A 6-week public consultation runs from 19 June until 30 July 2023. Details of the proposal, including the timescale for implementation, can be viewed via [this link](#)

Hard copies of the draft policy can be viewed at libraries in the Borough and the Town Hall.

To give feedback on the proposed licensed vehicle emissions policy please email: licensing@epsom-ewell.gov.uk or write to the Licensing Team, Epsom & Ewell Borough Council, Town Hall, The Parade, Epsom, Surrey, KT18 5BY

[The link above will provide details of the proposed emissions policy as shown in section 8 of the main report]

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PLANNING FEE INCOME REPORT

Head of Service:	Justin Turvey, Interim Head of Place Development
Wards affected:	(All Wards);
Urgent Decision?	No
If yes, reason urgent decision required:	N/A
Appendices (attached):	

Summary

The report identifies the adverse variance in planning-related fees for the financial year 2022/23 and outlines measures to address reduced forecast planning income and mitigation options.

Recommendation (s)

The Committee is asked to:

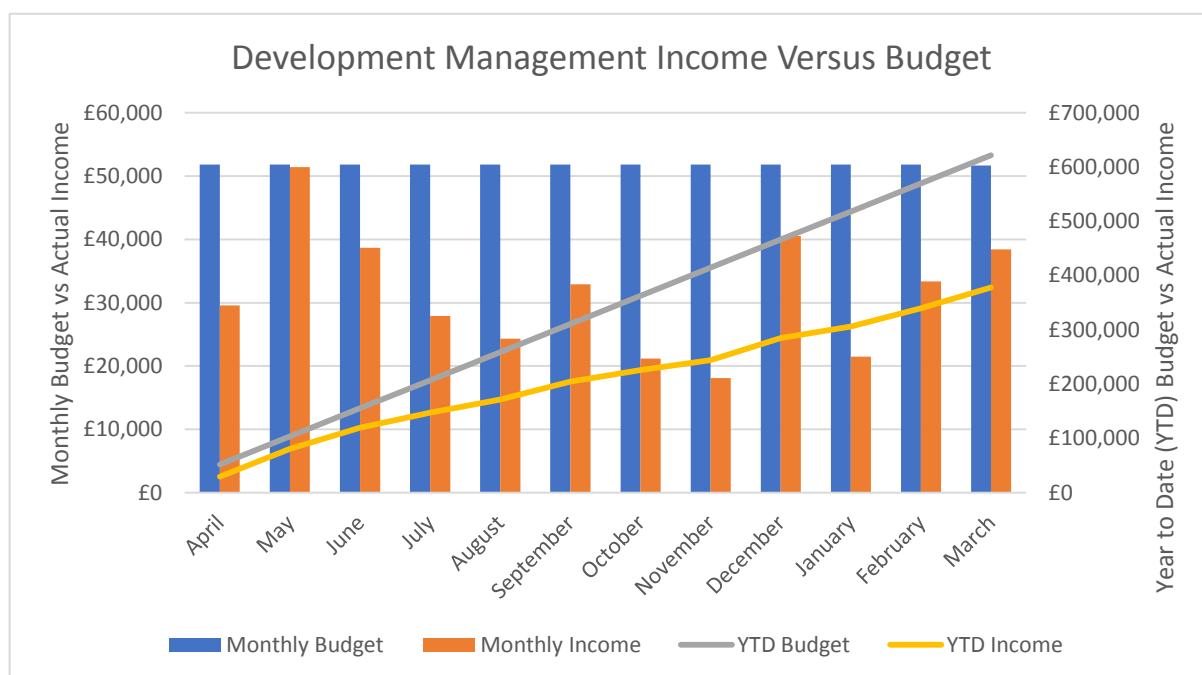
- (1) Agree that the reasons for the reduction in planning related fees is for reasons outside of the Council's control.**
- (2) Note the reduction in planning-related fees and the measures taken to address this, noting the limited opportunities for mitigation measures for income that is market led.**
- (3) Agree that future budget setting will take into account the outcome of government's technical fee consultation and officer knowledge of development in the pipeline.**

1 Reason for Recommendation

- 1.1 The recommendation will enable the Council to meet its statutory duty to set a balanced budget for 2023/24.

2 Background

- 2.1 The February meeting of the Audit and Scrutiny Committee were presented with the forecast revenue outturn position for the financial year 2022/23. The report identified reduced income from areas such as car parks and planning, and Audit and Scrutiny Committee requested that a report was prepared for Licensing & Planning Policy Committee to address reduced forecast planning income and identify mitigation options.
- 2.2 For 2022-23, the budgeted income from Development Management Services was £625,191. The actual income received based on provisional outturn was c. £380,000, an adverse variance of c.£245,000.



- 2.3 There are a number of reasons for the reduced income, which are set out below. It should be noted that the majority of these are issues outside of the control of the Council and are affecting most local authorities:

- After a short and rapid increase post-Covid, there has been a reduction in the overall number of planning applications submitted to the Council and accordingly reduced fee income. The total number of applications submitted nationally was 13% lower in Q3 2022-23 compared to Q3 2021-22, and this reduction has been reflected in the reduced number of applications received by Epsom & Ewell, which was 15% lower over that period.
- The reduction in applications particularly affects Major applications for residential development (10 or more dwellings) which attract a larger planning fee. This has largely been a consequence of wider economic issues.

- Nationally, uncertainty regarding government policy has been likely to have had an impact on the number of applications submitted, as have delays to the Council's Local Plan at a more local level, as a move towards adoption of a Local Plan tends to encourage larger sites to come forward to pre-application and application stage.
- Fees for planning applications are set nationally. The last revision was January 2018, and they have not been updated since, nor do the fees allow for indexation. Accordingly, planning application fees have not increased for 6 years. Although pre-application fees are set locally, they represent a small amount of the overall total planning income and cannot be raised significantly as it would discourage pre-application discussions which are discretionary.

2.4 The following mitigation actions will largely address the shortfall:

- A government consultation proposing an increase in planning fees titled: *'Increasing planning fees and performance: technical consultation'* closed in April 2023. The consultation included proposals to increase planning fees by 35% for major planning applications (which includes schemes of 10 or more homes) and 25% for all other applications. The fee for a householder planning application, for example, would increase from £206 to £258, and for a new dwelling from £462 to £624. Over the last financial year this would have resulted in an additional fee income of at least £95k, and looking forward with the potential for more Major planning applications being submitted this figure would be over £100k. Subject to the outcome of the consultation and parliamentary approval, the intention is to introduce this fee increase during 2023 according to DLUHC.
- The government consultation recognises that planning fees have not kept up with inflation, having last been set in 2018 and 2012 before that. As well as increasing fees, the government consultation also proposes that fees are adjusted annually in line with the CPI index rate.
- The consultation would also introduce other measures that would increase planning fee income to a lesser extent, such as doubling the relevant application fee for retrospective applications (i.e. applications where work on the development has already commenced) and removing the 'free go' for resubmitted planning applications. Removal of the free go for an application where the first application has been refused or withdrawn is likely to encourage more applicants to use the Council's pre-application service.

- As part of the work to improve the performance of the Development Management Service, a number of measures have been undertaken to improve efficiency (such as recruitment of an officer to validate planning applications which enables planning officers to focus on applications), investment in IT and improved ways of working. As part of the improvements, consideration is being given to ways to increase income generation, such as the provision of a paid for duty service and the addition of a 'fast-track' application service. However, measures such as this would require the provision of additional resource to ensure that the good work to improve performance was not undone by additional demands on resource. It would require a business case to be submitted for the additional resource and is not currently considered to be feasible.
- Given the costs involved in the preparation and submission of planning applications, larger developers tend to seek certainty before submission. Progression of the Local Plan gives developers more certainty regarding the acceptability of sites, and therefore tends to encourage the submission of larger planning applications which attract a higher fee.
- Pre-application and Planning Performance Agreement fees are set locally, and have been increased by inflation in recent years. The fees and charges for 2023/24 were completely overhauled to simplify them and ensure they were fit for purpose. A review of the Council's pre-application advice undertaken by the Planning Advisory Service (PAS) this year did advise that the fees were above average and therefore any further increase above inflation may discourage the submission of pre-application schemes. Pre-application submissions are generally welcomed as they enable officers to advise on the likely acceptability of schemes, allow presentations to local residents and Members and given the benefits, the price of pre-application advice and Planning Performance Agreements should be kept at the current level to ensure that applicants are not deterred from submitting schemes for pre-application advice to the Council.

3 Risk Assessment

Legal or other duties

3.1 Equality Impact Assessment

3.11 Increased fees and charges could have a negative effect on take up for some service areas. The current economic crisis has resulted in some instances in reduced revenue from fees and charges.

3.2 Crime & Disorder

3.2.1 None for the purposes of this report

3.3 Safeguarding

3.3.1 None for the purposes of this report

3.4 Dependencies

3.4.1 None for the purposes of this report

3.5 Other

3.5.1 None for the purposes of this report

4 Financial Implications

4.1 4.1 At its meeting in July 2022, Strategy & Resources Committee sought additional budget savings or income generation opportunities from committees to help address the budget deficit for 2023/24, which is forecast to reach £2.6m by 2025/26. Savings identified within this committee were an additional £25k of income within Development Management service. As identified above, the reduced planning fee income is largely outside of the control of the Council and has been caused by wider economic uncertainty.

4.2 **Section 151 Officer's comments:** The current government consultation is expected to result in higher statutory planning fees, which should partially mitigate the service's income shortfall. The outcome of this consultation, alongside officer knowledge of the development pipeline, will need to be taken into account for 2024/25 budget setting.

4.3 Where additional staff resource has previously been recruited on the basis of generating income that is no longer achievable, the resource should be reviewed to ensure it is still appropriate.

5 Legal Implications

5.1 5.1 There are no specific issues arising from this report, but the Council's resources will need to be applied to ensure that it fulfils its statutory obligations.

5.2 **Legal Officer's comments:** None arising directly from this report.

6 Policies, Plans & Partnerships

6.1 **Council's Key Priorities:** The following Key Priorities are engaged: Not relevant to this report.

6.2 **Service Plans:** The matter is included within the current Service Delivery Plan.

6.3 **Climate & Environmental Impact of recommendations:** None for the purposes of this report.

6.4 **Sustainability Policy & Community Safety Implications:** None for the purposes of this report.

6.5 **Partnerships:** None for the purposes of this report.

7 **Background papers**

7.1 The documents referred to in compiling this report are as follows:

Previous reports:

- Audit and Scrutiny Committee report February 2023

Other papers:

- None

LOCAL PLAN UPDATE

Head of Service:	Justin Turvey, Interim Head of Place Development
Wards affected:	(All Wards);
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	N/A
Appendices (attached):	Appendix 1 – Council Motion 22 March 2023 Appendix 2 – Standard Housing Method Calculations Appendix 3 – Local Development Scheme (November 2022)

Summary

Public consultation on the Draft Local Plan (2022-2040) was undertaken between 1 February 2023 and 19 March 2023. Following the closure of the public consultation an extraordinary Council meeting was held on the 22 March 2023 where the decision was made to pause the Local Plan to enable specified tasks to be undertaken.

This report provides an update on the work undertaken following the decision on the 22 March by Council and makes recommendations on the work that can progress prior to a decision being made at a future committee on a revised timetable for producing the Local Plan.

Recommendation (s)

The Committee is asked to:

- (1) Agree to the progression of specific workstreams prior to a revised Local Development Scheme (Local Plan timetable) being considered at a future committee meeting and note the work that has been undertaken since and in line with the decision by full Council to pause the Local Plan.**
- (2) To note that we have written to the Council in its capacity as landowner to check the availability of additional sites for promotion through the call for sites process.**

- (3) **Agree to request additional information regarding the deliverability of the Council owned Town Centre sites in preparation of Regulation 19 Local Plan.**
- (4) **Agree to pause with progressing the Local Heritage List in parallel to the Local Plan whilst we prioritise workloads and consider any implications.**

1 Reason for Recommendation

- 1.1 The Council is required by legislation to review its Local Plan every five years. The Council's current development plan consists of three Epsom and Ewell Borough Council documents all of which were adopted more than five years ago. The Epsom and Ewell Core Strategy (2009) and Plan E (2011) both predate the introduction of the National Planning Policy Framework and National Planning Practice Guidance. In the absence of an up-to-date Local Plan, there is risk to the Council, including the continued absence of a 5-year housing land supply and the additional measures introduced through the Housing Delivery Test. The NPPF's presumption in favour of sustainable development is currently engaged.
- 1.2 A substantive delay to the Local Plan timetable risks missing any future transitional arrangements that may come as part of a revised NPPF. It is therefore essential that work continues developing the Local Plan and its supporting evidence base.

2 Background

- 2.1 The current Epsom and Ewell Development Plan consists of three locally produced documents detailed below: -
- Core Strategy (adopted 2009)
 - Plan E Area Action Plan (2012)
 - Development Management Policies (2015)
- 2.2 It is important to note that two of the above development plan documents adopted by the borough pre-date the introduction of the National Planning Policy Framework and Planning Practice Guidance, which have been updated several times since their introduction. Local Plans must be prepared to be in general conformity with National Planning Policy.
- 2.3 The Government introduced a legal requirement for all local planning authorities to review their local plans at least every five years in January 2018. The Council's existing Development Plan documents are therefore considered to be out of date which has implications for the determination of planning applications in the borough.

Draft Local Plan Consultation

- 2.4 Following agreement by this committee on the 30 January 2023, consultation on the Draft Epsom and Ewell Local Plan (2022-2040) was undertaken between the 1 February and 19 March 2023.
- 2.5 The Draft Local Plan contained the strategy and sites to guide how the borough will change and develop over the plan period up until 2040 as well as detailed development management policies. This formed stage 2 of the 7-stage process to adopting a Local Plan (see figure 1).
- 2.6 The Local Plan consultation was advertised / promoted through a range of methods including posters and flyers, social media advertising, a large static display in the Ashley Centre shopping centre in Epsom and six consultation events (totalling 30 hours) where Council officers were available to speak to the public and answer questions.

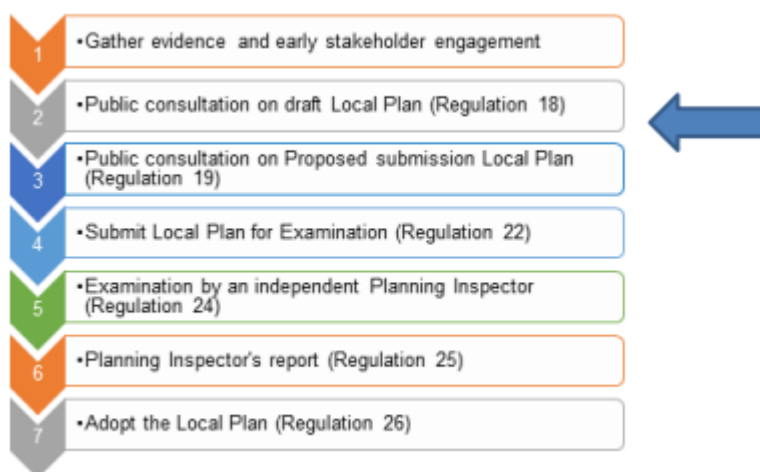


Figure 1: seven core stages of Local Plan production

- 2.7 The draft Local Plan that was consulted on between 1 February 2023 and 19 March 2023 set out a proposed growth strategy for the borough, to provide a minimum of 5,400 homes over the Local Plan Period (average of 300 dwellings per annum). The proposed growth strategy reflects the need to balance the provision of new homes (including affordable housing) with environmental and policy constraints such as land designated as Sites of Special Scientific Interest, Sites of Nature Conservation Importance, Local Nature Reserves and Green Belt.
- 2.8 During the Local Plan consultation period we received over 1,650 responses from individuals or organisations. This included responses from Statutory Consultees such as Surrey County Council, Historic England and neighbouring planning authorities.

- 2.9 Officers are currently processing all of the representations received during the consultation period and will be publishing the comments on our consultation platform in due course with personal information redacted (such as email addresses and postal addresses). As part of this process all responses are reviewed to see whether they contain abusive or defamatory comments, such comments will be redacted or where this is not possible, the representation rejected.
- 2.10 The Local Plan needs to balance different needs, such as the need for housing (including affordable housing), the need for commercial floorspace and the environment to deliver sustainable development.

The Council Motion

- 2.11 At an Extraordinary meeting of the council on Wednesday 22 March 2023, a motion was considered under CR 14 of Part 4 of the Council's Constitution (Appendix 1). The motion that was Carried was that the Council agrees that:
- i) Other than for the purpose of analysing the responses of the public consultation to capture residents' views and any new information, the Local Plan process be paused to enable:
 - a) further work on brown field sites, including information arising out of the Regulation 18 consultation
 - b) further options to be considered that do not include green belt sites
 - c) an analysis of Epsom and Ewell's required future housing numbers based on 2018 data
 - d) a clearer understanding of the Government's legislative intentions in regard to protections for the green belt and the current mandatory target for housing numbers.
 - ii. Write to the MP for Epsom and Ewell calling on him to use his influence to get the Government to abandon its use of 2014 data to calculate housing need and accept that all planning and housing policies must reflect the latest data if they are to be effective as well command the respect of the people they affect.

Work undertaken since the motion was carried

Representations made on the Local Plan

- 2.12 Since the motion was carried work has continued processing and analysing the responses received on the consultation Draft Local Plan, which will be published in due course (see para 2.9).

Brownfield Land

- 2.13 We have continued to encourage additional sites to be put forward for consideration through the Local Plan process, with a call for sites being undertaken alongside consultation on the Local Plan and subsequently left open to enable new sites to be submitted and we have again written to landowners requesting confirmation of availability.
- 2.14 The Draft Local Plan detailed sources of housing supply in Table 3.1. This Table includes capacity (1,042 dwellings) from urban sites which do not benefit from a specific site allocation. These sites were detailed in Appendix 2 of the Draft Local Plan and for most of these 46 sites the availability of the sites was unknown, despite the council contacting the freeholder(s) in 2022. Most of these sites were identified through a desktop review exercise undertaken by EEBC officers to identify additional land that may be suitable for development within the urban area and therefore they have not been promoted by the landowner.
- 2.15 Following the consultation on the draft Local Plan we have written again to the freeholders of these sites including the Council to determine whether the sites are available. This is because to be included in the housing supply of future iterations of the Local Plan, the availability of the sites needs to be confirmed by the landowner (freeholder). Following this second round of targeted engagement, as of 24 May 2023 only 2 sites listed within Appendix 2 sites have been confirmed as available through the submission of a call for sites form.
- 2.16 In addition, the landowner of the Former Dairy Crest Site at 4 Alexandra Road (COL002) has confirmed that the site is available for retail use but not for residential use. This site was detailed in Appendix 2 of the Local Plan as having some potential capacity for residential development (20 units) and this potential supply has been lost.
- 2.17 We will continue to proactively approach landowners however, to progress the Local Plan, we will have to close the call for sites process to new submissions at the end of July 2023 so that we have a clear idea of the sites we have available for development over the Local Plan period. If, the number of sites confirmed as being available remains limited once the call for sites closes, our housing capacity from urban sites will reduce from that detailed in the Draft Local Plan.

Further work on non-green belt options

- 2.18 As noted above, we are continuing to identify the availability of urban sites for development to assist in meeting development needs over the Local Plan period. It is important to note that the Interim Sustainability Appraisal accompanying the Draft Local Plan identified different options (reasonable growth scenarios) which proposed different levels of growth. Two of the reasonable growth scenarios didn't propose the release of any green belt land to meet development need.
- 2.19 Through the public consultation, some respondents referenced the option that had been promoted by Chris Grayling MP regarding the redevelopment of Kiln Lane and Longmead Industrial Estates. This is addressed below.

Kiln Lane / Longmead brownfield option

- 2.20 Within the two employment sites a small number of sites have been promoted for development for a mix of uses, through the call for sites process, despite landowners being written to in 2022 and subsequently following the publication of the Draft Local Plan. At the time of writing, no additional sites have been promoted through the call for sites process since the second round of proactive engagement.
- 2.21 Although few sites are being promoted for housing development within these two industrial estates, the Council undertook work to investigate the feasibility of a comprehensive redevelopment for a housing led scheme. This included the current economic value of the businesses to the Local and wider economy and the likely costs of land assembly in the absence of landowner consent.
- 2.22 Kiln Lane and Longmead Industrial Estates are the boroughs two largest employment areas supporting approximately 130 companies and 1,900 jobs across a diverse range of sectors. The units on the site are well occupied with very low vacancy rates which may be impacting on the willingness of landowners to put the sites forward for development as their assets are performing well financially.
- 2.23 It is widely acknowledged that industrial and warehouse accommodation continued to perform strongly during the covid pandemic and subsequent recovery. Demonstrating the demand for modern warehousing floorspace, the council has recently consented a new development for a builders merchants that will replace an aging bus depot at the Longmead Industrial Estate. This demonstrates that there is demand for accommodation and investment in industrial locations.

- 2.24 We have looked at the opportunity to make more efficient use of land and Kiln Lane and Longmead employment sites, and Draft Local Plan Policy S11 provides the hook for the redevelopment of the site, with criteria 3 of the policy stating *'that at the Kiln Lane Strategic Employment Site (as defined on the policies map), mixed use proposals that result in no net loss of employment floorspace will be supported where the proposal is in conformity with a comprehensive masterplan for the site that has been approved by the Council'*.
- 2.25 The Housing and Economic Development Needs Assessment (HEDNA) identifies a need for additional employment land / floorspace over the Local Plan period and recommends that the Council should continue to secure the warehousing and general industrial floorspace supply in key industrial estates of the Borough.
- 2.26 To conclude, currently there remain limited sites being promoted actively by landowners through the call for sites process within the Longmead and Kiln Lane site for development. The two employment sites are well occupied and support a wide range of businesses and there is a need for land to accommodate additional employment floorspace (including uses suited to an industrial estate location) over the Local Plan period.
- 2.27 To date the council has invested substantial resource investigating opportunities relating to the redevelopment of the industrial estates.
- 2.28 Further work would only be reasonable from a planning policy perspective if a substantial proportion of the land became formally available with land promoted through the call for sites process. It is therefore proposed to formally ask the Council if it would consider making its land available for redevelopment. A formal response through the call for sites process would provide key evidence to support any future approach taken in the Local Plan to the location of development.

Urban Site capacity

- 2.29 We are continuing to review the capacity and density of sites within the urban area that have been confirmed as being available through the call for sites process.
- 2.30 The emerging Epsom Town Centre Masterplan is a core piece of evidence that has informed Proposed Allocations SA1 to SA4 of the Local Plan. We are currently considering the comments received from site promoters during the consultation on the Local Plan and engaging with site promoters. Landowners of these sites will need to prepare detailed work to justify any amendments to the future site allocation policy and capacity and to demonstrate deliverability as part of the Regulation 19 Local Plan. This includes those town centre sites owned by the Council.

- 2.31 Other evidence or emerging designations may also impact the ability of the urban area to accommodate additional development. One such designation is Local Listing; this is discussed further in paragraphs 2.54 to 2.57.
- 2.32 The potential housing supply from urban areas remains fluid, with work ongoing, and will only become clear once the current call for sites has closed. Whilst we might be able to secure additional housing supply from those sites that are confirmed as being available, at this time these 'gains' are likely to be offset by the 'losses' from sites that are not confirmed as being available and therefore cannot feature in the supply in future iterations of the Local Plan.

Housing figures base on 2018 data

- 2.33 The National Planning Policy Framework requires the use of the standard method for calculating housing needs. The standard method (as set out in the Planning Practice Guidance) requires all local authorities in England to utilise ONS Household Growth Projection data from 2014. As of April 2023, this generates a minimum housing need figure of 573 dwellings per annum for Epsom and Ewell.
- 2.34 The ONS published revised forecasts in 2018, which predict much lower household growth nationally and within Epsom and Ewell Borough. If we were to put these figures into the standard method (as opposed to the 2014 data) this would generate a minimum housing need figure of 253 dwellings per annum for Epsom and Ewell.
- 2.35 The calculations for the standard method using both 2014 and 2018 ONS data are contained in Appendix 2.
- 2.36 It is important to note that the government made it clear in its recent consultation on proposed changes to the National Planning Policy Framework that it will not be amending the standard methodology to utilise 2018 data. The government indicated that the standard method would be updated in 2024 to be based on census data. We anticipate that the government will amend the methodology in its entirety at this time and we would express caution in assuming that the methodology would remain unchanged other than the population projection utilised.

Government's legislative intentions

- 2.37 As part of the governments Levelling up-and regeneration Bill: reforms to national policy consultation a track changed version of the NPPF was consulted upon with the government due to respond to this consultation and publishing the framework revisions by spring 2023.
- 2.38 As noted in the January 2023 report to this committee, the core changes for Plan Making related to the standard method for housing becoming advisory and the clarification of the point that local authorities do not need to review their Green Belt if it is the only way to meet housing needs.

- 2.39 The proposal that the housing requirements generated by the standard method becoming advisory, would not impact the approach to the Epsom and Ewell Local Plan. The Draft Local Plan that was subject to public consultation set a housing requirement of 300 dwellings per annum, compared to the standard method minimum housing need (April 2022) of 576 dwellings per annum. The Council is therefore not proposing to meet the governments housing requirements as we do not consider that doing so would deliver sustainable development in the borough.
- 2.40 At a recent Levelling Up, Housing and Communities Select Committee (April 2023), it was implied that the revised NPPF is not going to be published in Spring 2023 as initially intended and no indication of timescales for publication were discussed. During the committee it was stated that the government are considering approximately 26,000 responses that they received to the consultation.
- 2.41 The Levelling up and Regeneration Bill is currently at the Committee Stage in the House of Lords. It is important to note that during the committee stage, every clause of the Bill has to be agreed to and votes on any amendments can take place. All suggested amendments have to be considered.
- 2.42 It is important to note that the recent consultation on changes to the National Planning Policy system the government did not propose any changes to the standard method for calculating minimum housing needs but stated that the government will review the implication on the standard method of new household projections data based on the 2021 Census, which is due to be published in 2024.
- 2.43 It is unclear when the revised standard method will be published in 2024. It may be the case that the government decide to implement changes to the standard method as part of the more fundamental reforms to national policy to be introduced following the Levelling up and Regeneration Bill receiving royal assent.

The Importance of progressing the Local Plan

- 2.44 The Local Plan is a statutory requirement, and the Government has made it clear that all local authorities must have an up-to-date plan. Failure to do so could lead to intervention whereby the Government writes our Local Plan and policies. Without a new plan we could find ourselves unable to resist unacceptable development or refused applications being allowed on appeal. This could result in unplanned development in unsustainable locations
- 2.45 An up to date Local Plan is key to delivering other corporate priorities of the Council, including reducing homelessness through the delivery of more homes, and delivering additional affordable housing in the borough.

- 2.46 The next step to progress the Local Plan towards adoption is the production of a Submission Draft Local Plan (Regulation 19) which will be subject to a consultation process after which all comments submitted are forwarded to the Secretary of State for consideration by the Planning Inspectorate alongside the Submission Draft Plan.
- 2.47 A Local Plan examination will follow afterwards allowing an opportunity to comment on the Plan. The Planning Inspectorate will be looking to determine if the Plan is sound. This means that the Plan should be:
- Positively prepared – the plan should provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – the plan should provide an appropriate strategy when considered against reasonable alternatives based on proportionate evidence;
 - Effective – the plan should be deliverable over the plan period up to 2040 and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies of the Framework or other statement of national policy, where relevant.
- 2.48 The Local Development Scheme (Local Plan Timetable) that was adopted by this committee in November 2022 (Appendix 3) sets out the timescales for progressing the Local Plan through the stages detailed above which are summarised below:
- Publication of Submission Draft Local Plan (Regulation 19) – public consultation scheduled for February to March 2024.
 - Submission and Examination of the Local Plan (June 2024)
 - Adoption of the Local Plan (expected Spring 2025)
- 2.49 This timetable is no longer achievable and will need revising at a future meeting of this committee.

Additional workstreams to progress in the short term

- 2.50 It is recommended that the planning policy team make progress with the following workstreams over the summer to support the development of the Local Plan to reduce the length of the delay once the Local Plan is un-paused:
- Continued engagement with willing landowners / site promoters to ensure that we are making the most efficient use of land in the urban area.
 - Work towards finalising the Epsom Town Centre Masterplan having had regard to the comments received during the Draft Local Plan consultation process, including those from the site promoters.
 - Following the closure of the call for sites process, update the Land Availability Assessment and baseline housing land supply position.
 - Update the Strategic Flood Risk Assessment to reflect updated National Policy and Guidance and amendments to Flood Zone boundaries published by the Environment Agency.
 - Continue to prepare for the introduction of mandatory biodiversity net gain in November 2023.
 - Consider the feedback received on those Local Plan policies that do not impact the spatial strategy (i.e. sites) and to update these policies as necessary.
 - Continuing to respond to government consultations and keeping a watching brief on potential changes to legislation, national policy and guidance.
- 2.51 In addition, due to the changes in councillors following the local elections, officers propose to hold a series of member briefings during the summer in relation to the Local Plan. These briefings will be held prior to a future report being considered by this committee on the Local Plan timetable.
- 2.52 It is important to note that the longer the delay in progressing the local plan increases the risk of some of the existing evidence base becoming out of date before we submit our Local Plan to the planning inspectorate, such as evidence relating to development needs or development viability.
- 2.53 In addition, delays have budgetary implications for resourcing the planning policy team. The resourcing of the Planning Policy Team is currently dependent upon two fixed term contract posts that were approved by the Strategy and Resources Committee on the 30th March 2021. The Principal Policy Officer Postholder contract expires in early May 2024 and the Planning Policy Officer Postholders contract expires early December 2024.

Local Heritage List Review

- 2.54 Following the receipt of government funding, Surrey County Council has worked with Epsom and Ewell and five other Surrey Boroughs to update the local heritage assets list (also known as the Local List). The County Council have recently completed this project and are in the process of handing over data to EEBC.
- 2.55 Each existing building or structure on the local list in addition to any assets nominated through the consultation process undertaken between October and November 2021 have now been assessed against selection criteria based upon national guidance to determine whether it qualifies for inclusion on the local list.
- 2.56 This committee will need to consider the revised Local List at a future meeting to approve undertaking consultation with the owners of any new buildings or structures proposed to be locally listed and those that submitted responses (note: individuals or organisations that submitted responses to the Local List will need to make themselves known to EEBC to be formally consulted for GDPR reasons).
- 2.57 Due to other work commitments related to the progressing the Local Plan (see paragraph 2.50) in addition to the roll out of new software systems in Planning Policy, it is recommended that the Local List Review is paused whilst we await receipt of all the information and consider the implications for progressing the Local Plan and other supporting evidence.

3 Risk Assessment

Legal or other duties

3.1 Equality Impact Assessment

- 3.1.1 An Equality Impact Assessment (EqIA) of the Draft Local Plan was published as part of the consultation materials. The purpose of the EqIA is to ensure that the plan promotes equality and does not discriminate. The EqIA concluded that there the Draft Local Plan will not impact negatively on specific groups.

3.2 Crime & Disorder

- 3.2.1 None arising from this report.

3.3 Safeguarding

- 3.3.1 None arising from this report.

3.4 Dependencies

- 3.4.1 The delivery of key corporate objectives/actions are dependent on progressing the Local Plan, including

- Actions identified in the Affordable Housing Audit
- Homelessness and Rough Sleeper Strategy and supporting action plan
- Climate Change Action Plan

3.5 Other

3.5.1 None arising from this report.

4 Financial Implications

4.1 The budget envelope for the delivery of the Local Plan was agreed by Strategy & Resources in March 2021. Any delay in delivering the Local Plan is likely to have budgetary implications.

4.2 **Section 151 Officer's comments:** Wherever possible, the service should aim to produce the Local Plan within the budget envelope agreed by Strategy and Resources Committee. As the project progresses, any request for additional resources should be supported by a robust business case for members to consider and scrutinise.

5 Legal Implications

5.1 There are no direct legal implications as a result of this report. The Local Plan must be prepared within the legal planning framework.

5.2 **Legal Officer's comments:** none for the purposes of this report

6 Policies, Plans & Partnerships

6.1 **Council's Key Priorities:** The new Local Plan will contribute towards delivering the Council's Vision and priorities in its Four-Year Plan.

6.2 **Service Plans:** The matter is included within the current Service Delivery Plan.

6.3 **Climate & Environmental Impact of recommendations:** The Local Plan will play a key role in implementing our Climate Change Action Plan.

6.4 **Sustainability Policy & Community Safety Implications:** The Local Plan itself has a key role in delivering sustainable development.

6.5 **Partnerships:** The Council has a duty to cooperate with relevant stakeholders in the preparation of a Development Plan. The Council notified Duty to Cooperate bodies of the Draft Local Plan consultation and invited comments on the draft document.

7 Background papers

7.1 The documents referred to in compiling this report are as follows:

Previous reports:

- Licensing and Planning Policy Committee 30 January 2023 – Epsom and Ewell Local Plan 2022-2040
- Licensing and Planning Policy Committee 21 November 2022 – Local Plan – Revised Local Development Scheme
- Licensing and Planning Policy Committee 21 June 2022 –Local Plan Funding Update

Other papers:

- Equality Impact Assessment of the Draft Local Plan (January 2023)

<https://www.epsom-ewell.gov.uk/sites/default/files/documents/residents/planning/planning-policy/epsom-and-ewell-local-plan/EIA-%20Draft%20local%20plan%20Final.pdf>

- Interim Sustainability Appraisal of the Draft Local Plan (January 2023)

<https://www.epsom-ewell.gov.uk/sites/default/files/Epsom%20and%20Ewell%20Local%20Plan%20SA%20-%20Interim%20SA%20Report%20230131.pdf>

Local Development Scheme

(Timetable for preparing the Local Plan)

November 2022

Epsom & Ewell Borough Council

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1.0 Introduction

1.1 Epsom and Ewell Borough Council is required to prepare and maintain a Local Development Scheme (LDS) in accordance with the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011).“(2) The scheme must specify—

- a) The local development documents¹ which are to be development plan documents².
- b) The subject matter and geographical area to which each development plan document is to relate;
- c) Which development plan documents (if any) are to be prepared jointly with one or more other local planning authorities
- d) Any matter or area in respect of which the authority has agreed (or propose to agree) to the constitution of a joint committee under section 29.

e) The timetable for the preparation and revision of the development plan documents”.

Planning and Compulsory Purchase Act 2004 (Section 15)

1.2 The LDS is a project plan that sets out the timetable to produce new or revised Development Plan Documents which will form the Council’s statutory Development Plan³. This LDS, which supersedes all previous versions, sets out a planning work programme for the Council over a three-year period to 2025. It will be reviewed annually through the Authority Monitoring Report which can found [here](#).

2.0 The current adopted Development Plan

- 2.1 The current adopted statutory development plan for Epsom and Ewell Borough Council is made up of:
- Epsom & Ewell Core Strategy 2007
 - Plan E Epsom Town Centre Area Action Plan 2011
 - Epsom & Ewell Development Management Policies Document 2015
 - Surrey Waste Plan 2008
 - Surrey Minerals Plan Core Strategy 2011

¹ As defined in Regulation 5 of The Town and Country Planning (Local Planning) (England) Regulations 2012. E.g., Local Plan, Supplementary Planning Document, Area Action Plan

² Development Plan Documents are for example Local Plans, Area Action Plans. They refer to the development and use of land, the allocations of sites and development management and site allocation policies.

³ The statutory Development Plan is made up of all adopted Development Plan Documents, e.g., any local plan, area action plan both at the borough level and at the county level.

3.0 Other relevant documents

Statement of Community Involvement

- 3.1 The current [Statement of Community Involvement](#) (SCI) was adopted in July 2022 to support the preparation of the Local Plan. The Statement of Community Involvement (SCI) describes how the public, businesses and interested groups within Epsom and Ewell Borough can get involved in the creation of local planning policy, neighbourhood planning and the planning application decision making process.

Authority Monitoring Report

- 3.2 The Council publishes up-to-date authority monitoring information on its website. This focusses on assessing progress against the LDS and current planning policies that include annual numbers for new homes (including affordable homes). It also includes information about Neighbourhood Plans, the Community Infrastructure Levy (CIL) and the Duty to Co-operate.
- 3.3 The Authority Monitoring Report webpage can be viewed [here](#).

Policies Map

- 3.4 Finally, the Council is required to produce a Policies Map which shows the location of proposals in all current, adopted local development documents on an ordnance survey-based map. The map is web based and is kept up-to-date and reflects current adopted policies within the borough.

Community Infrastructure Levy (CIL)

- 3.5 The Community Infrastructure Levy (CIL) raises funds from new development for essential infrastructure. It primarily replaces the older system of financial contributions and planning obligations ('Section 106 agreements'). Under the CIL regulations limitations have been placed on the ability of councils to use S106 monies to provide for infrastructure beyond the mitigation of specific developments.
- 3.6 The Council adopted its CIL charging Schedule on the 29 April 2014 with an implementation date of 1 July 2014. The CIL charging rates are supported by evidence of development viability.

Supplementary Planning Documents

- 3.7 Although part of the development framework, Supplementary Planning Documents⁴ (SPDs) no longer need to be identified in the LDS. The Council currently has the following SPD's.
- Upper High Street, Depot Road and Church Street Development Brief 2012
 - Revised Developer Contributions Supplementary Planning Document 2014
 - Parking Standards for Residential Development 2015
 - Revised Sustainable Design Supplementary Planning Document 2016.

4.0 The emerging Development Plan

Local Plan 2040

- 4.1 The Local Plan 2040 will set the vision and framework for future development of the borough to 2040. This will include addressing local housing need, the economy, environmental considerations, community infrastructure as well as strategic infrastructure needs. The geographical area covered by the Local Plan 2040 is the borough of Epsom and Ewell.

Stages of Local Plan 2040 preparation

- 4.2 There are several key stages in the preparation of the Local Plan, each are subject to the Strategic Environmental Assessment (SEA) Directive⁵ which will be incorporated into the Sustainability Appraisal⁶:

Pre-publication stage (Regulation 18)

This initial stage involves extensive evidence gathering, engaging with the local community, businesses and stakeholders on emerging issues and options, consulting with statutory environmental consultees on the scope of the sustainability appraisal, and infrastructure providers with regards to development options. This is scheduled for February – March 2023.

Publication of Submission Draft Local Plan (Regulation 19)

Following Regulation 18, the next stage is for the Council to publish a draft version of the Local Plan 2040 and invite representations in accordance

⁴ Supplementary Planning Documents are a type of Local Development Document, but they only concern any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land. Anything else is a Development Plan Document.

⁵ The SEA Directive applies to a wide range of public plans and programmes (e.g., on land use, transport, energy, waste, agriculture, etc.). An SEA is mandatory for plans/programmes which are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste/ water management, telecommunications, tourism, town & country planning, or land use. An SEA can be summarized as follows: an environmental report is prepared in which the likely significant effects on the environment and the reasonable alternatives of the proposed plan or programme are identified.

⁶ A sustainability appraisal is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic, and social objectives.

with Regulation 19. These representations will be based on whether the draft plan is legally compliant and/or sound when assessed against the requirements contained in the National Planning Policy Framework (NPPF). This is scheduled for February – March 2024.

Submission and Examination of the Local Plan (Regulation 22)

Following Regulation 19 stage, the next stage is for the Council to formally submit the draft Local Plan 2040 and evidence base to the Planning Inspectorate for examination on behalf of the Secretary of State. An Independent Planning Inspector will assess the Plan against the tests of soundness contained in the NPPF, taking account of any representations (comments) received. This is scheduled for June 2024.

Adoption

If the Plan is found to be 'sound', the Council may adopt the Plan as soon as practicable following receipt of the Inspector's report unless the Secretary of State intervenes. Once adopted, the Local Plan 2040 will form the main part of the statutory development plan for the borough. This is expected by Spring 2025.

- 4.3 The complete timetable and 'key milestones' to produce the Local Plan 2040 are set out in Appendix 1.

Neighbourhood Plans

- 4.4 There is currently one Neighbourhood Plan Area Designation in the borough. Once adopted, Neighbourhood Plans form part of the Development Plan. These are not programmed by the local authority and therefore are not included within this LDS project timetable. More information can be found [here](#).

5.0 Delivery and Implementation

Joint working - The Duty to Co-operate

- 5.1 The Council has a proven track record of working with neighbouring authorities (including those outside the County) and with Surrey County Council. Where appropriate, inter-authority working groups will be established during the preparation of the Local Plan 2040. The Council will work in partnership with neighbouring authorities where necessary to prepare various evidence base documents.

Resources available for the production of the Local Plan

- 5.2 In preparing the Local Plan, the Council's Planning Policy Team will utilise 'specialist officers', and other strands of expertise from within the Council, other organisations and bodies as appropriate.
- 5.3 The Council also makes provision for the need to use certain expert consultants to assist in producing various elements of the technical background work. This may occur where either the necessary expertise is not available within the Council or insufficient resources exist to be able to bring forward the necessary work within

the required timescale. Consultant facilitators may also be used to assist with focus group work and community participation exercises.

Council Procedures

- 5.4 For matters relating to the new Local Plan, the following reporting protocols will apply:
- Licensing and Planning Policy Committee will be responsible for the preparation, production, and completion of the draft local plan (Regulation 18); and
 - Full Council will be responsible for the Proposed Submission Local Plan (Regulation 19) and the formal adoption of the local plan following consultation and examination.

Risk Assessment

- 5.4 The production of a local plan requires consideration of the potential risk involved in its preparation. These vary from local matters, such as changes in staffing levels or political/administrative changes, to those of national significance including revised government guidance.
- 5.5 In preparing this LDS, it was found that the main areas of risk relate to:

Problems with joint working or compliance with the duty to co-operate: Close working with other authorities and organisations will continue to detect issues early in the process.

Capacity of the Planning Inspectorate (PINS) and other agencies to cope with demand nationwide: Advance notification of our programme will be given to assist in the development of PINS/other agencies work programmes' to address the requirements of the LDS.

Revisions to national planning policy and guidance: Revisions are anticipated to the NPPF. Changes to national planning policy and guidance at a more advanced stage in local plan preparation can cause delay. Close monitoring of national changes will be required alongside liaison with the Department for Levelling Up, Housing and Communities (DLUHC) where required.

Full Council fails to agree Local Plan: Officers will work closely with all Councillors to raise awareness of the Local Plan and seek to achieve 'buy-in' of its proposals at an early stage.

Programme Slippage: An exceptionally high level of response during public consultation on a Development Plan Document could lead to programme slippage.

Legal Challenge: The Council will aim to minimise this by ensuring that Development Plan Documents are 'sound' and founded on a robust evidence base and well-audited stakeholder and community engagement processes.

Monitoring and Review

- 5.6 The Council's Monitoring Report will monitor the progress of the LDS on an annual

basis.

- 5.7 The Monitoring Report will monitor the delivery of policies when they have been adopted.

6.0 Appendix 1 - LDS timetable

6.1 Local Plan 2040- timetable to 2025/26

2022/23	Q3	Oct	
		Nov	
		Dec	
	Q4	Jan	
		Feb	Reg 18 - Public Consultation
Mar			
2023/24	Q1	Apr	
		May	
		Jun	
	Q2	Jul	
		Aug	
		Sep	
	Q3	Oct	
		Nov	
		Dec	
	Q4	Jan	
		Feb	Reg 19 - Public Consultation
		Mar	
	2024/25	Q1	Apr
May			
Jun			Reg 22 – Submission of document
Q2		Jul	
		Aug	EIP
		Sep	
Q3		Oct	
		Nov	
		Dec	
Q4		Jan	
		Feb	
		Mar	
2025/26	Q1	Apr	R
		May	A
		Jun	
	Q2	Jul	
		Aug	
Sep			

Key

	Regulation 18 - Evidence base gathering, early engagement, and initial consultations
	Regulation 19 - Public Consultation – Publication of draft Local Plan
	Regulation 22 - Submission of document; EIP - Examination hearings; R - Inspector's final report
	A Adoption of Local Plan

Appendix 2 - Standard Method Calculation and the implications of using 2018 Household projections

This appendix is split into two chapters:

- Chapter 1 - How housing need is calculated using the standard method set out in national planning practice guidance
- Chapter 2 - The implications of inputting 2018 household projection data into the standard method as opposed to the 2014 data required by national planning practice guidance.

1 Standard Method Calculation (April 2023) as required national policy and guidance

Step 1: Setting the baseline

- 1.1 The standard method uses the 2014-based household projections in England to set the demographic baseline from which the Housing Need Figure is calculated.
- 1.2 This is the annual average household growth over 10 years with the current year being the first year. As this document is being published in 2023, the period examined is 2023-2033.
- 1.3 As set out in the table below there is expected to be a 4,091 unit growth in households in Epsom & Ewell from 2023 to 2033 or 409 households per annum. This equates to a 11.8% increase in households over the same period.

Table 1 - Household growth in the borough 2023-2033 (2014 household projections)

Group	Number
Households 2023	34,665
Households 2033	38,756
Change in households	4,091
Per annum change (step 1)	409
% change	11.8

Step 2: Adjustment to take into account affordability

- 1.4 The purpose of Step 2 is to adjust the demographic baseline based on local affordability. The purpose of the adjustment is to increase the housing need figure where house prices are high relative to workplace incomes.

- 1.5 The market signal used to test this is the median workplace-based affordability ratio (MWAR) published by ONS in the most recently published year.
- 1.6 The adjustment increases the housing need derived from the household projections by 0.25% for every percentage point the affordability ratio is above four (4.0). The basis for this is that four is the typical multiple of household income mortgage providers use when calculating the maximum they are prepared to lend. The equation is as follows:

$$\text{Adjustment factor} = ((\text{Local affordability ratio} - 4)/4) \times 0.25$$

- 1.7 In 2022 (the most recent year for which this metric was recorded), the MWAR was 20 in Epsom & Ewell. This means that median house prices were 20 times the median earnings of those working in the local authority area.
- 1.8 As set out in the table below this results in an adjustment factor for the Borough of 100%. This is calculated as follows: $((20.00 - 4) / 4) \times 0.25 = 100\%$.

Table 2 - Affordability Uplift (2014 household projections)

Group	Number
Per annum change (Step 1)	409
Affordability ratio (2022)	20
Uplift to household growth	100%
Total need (per annum)	818

- 1.9 To this point, the housing need in Epsom & Ewell would be 818 per annum. This is the Council's need before any capping has been applied (Step 3).

Step 3: Capping the level of any increase

- 1.10 The third step in the standard method is to cap the market signals uplift. This limits the increases an individual local authority can face.
- 1.11 How the cap is applied depends on the age of the adopted Local Plan and the scale of household growth. The first is where an authority has reviewed its plan (including developing an assessment of housing need) or adopted a plan (including a spatial development strategy) within the last five years the need may be capped at 40% above the requirement figure set out in this plan.
- 1.12 The second is where plans are more than five years old. Here, the cap is calculated at 40% above either the projected household growth

calculated in Step 1 or the housing requirement in the most recent plan (where this exists), whichever is higher.

- 1.13 The second approach is what applies to Epsom and Ewell as the Core Strategy which sets out the housing requirement dates from 2007.

Table 3 – Cap calculations (2014 household projections)

Cap Methods (plan more than 5 years old)	Output
1. 40% above stage 1 requirement (409dpa)	573
2. 40% above existing Local Plan requirement (181dpa)	253

- 1.14 The capped figure is less than the figure arrived at in Step 2 (818dpa).

- 1.15 The Local Housing Need Figure for the borough as of April 2023 is capped at **573dpa** at Step 3 of the standard method.

2 Calculation (April 2023) utilising 2018 household projection data

- 2.1 This section provides details on the implications of using 2018 Household Projections as opposed to 2014 household projections in the standard methodology. Please note that this approach is not compliant with national policy and guidance and for illustrative purposes only.

Step 1: Setting the baseline

- 2.2 Using the 2018-based household projections for the period 2023-2033, there is expected to be a 1,477 unit growth in households in the borough or 148 households per annum. This equates to a 4.6% increase in households over the same period.

Table 4 - Household growth in the borough 2023-2033 (2018 household projections)

Group	Number
Households 2023	31,876
Households 2033	33,353
Change in households	1,447
Per annum change (step 1)	148
% change	4.6

Step 2: Adjustment to take into account affordability

- 2.3 As set out in Chapter 1, median house prices were 20 times the median earnings of those working in the local authority area therefore the uplift against stage 1 outputs remains 100%.

Table 5 - Affordability Uplift (2018 household projections)

Group	Number
Per annum change (Step 1)	148
Affordability ratio (2022)	20
Uplift to household growth	100%
Total need (per annum)	296

- 2.5 To this point, the housing need in Epsom & Ewell would be 296 per annum based on 2018 ONS household projections. This is the Council's need before any capping has been applied (Step 3).

Step 3: Capping the level of any increase

- 2.6 As set out in Chapter 1, our adopted Local Plan that sets the housing strategy is more than 5 years old, therefore the cap is calculated at 40% above either the projected household growth calculated in Step 1 or the housing requirement in the most recent plan, whichever is higher.

Table 6 – Cap calculations (2018 household projections)

Cap Methods (plan more than 5 years old)	Output
1. 40% above stage 1 requirement (148dpa)	207
2. 40% above existing Local Plan requirement (181dpa)	253

- 2.7 The above demonstrates that if 2018 household projections were accepted as opposed to 2014 household projections, with no other changes being made to the standard methodology for calculating housing needs, the minimum housing need for the borough would be **253dpa**.

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Motions to Council

Motion 1	
Proposer	Cllr Eber Kington
Seconder	Cllr Christine Howells
Motion	<p>This Council notes that:</p> <ol style="list-style-type: none"> 1. Extensive green areas, especially the green belt, and the absence of high-level development in our urban areas makes Epsom and Ewell a distinctive, green and an excellent place to live. 2. Under the existing legislation Local Planning Authorities are being required to draft Local Plans on the basis of out of date, 2014, data that does not reflect Epsom and Ewell's housing need, as shown in more recently available 2018 data. 3. The Government's recently proposed legislative changes to the planning process, whilst welcome in several aspects, are not yet enacted and the current legal position has not changed. <p>These factors suggest that a pause in progressing the Draft Local Plan in its current form would provide an opportunity to assess the Government's draft proposals as well as the 2018 data on housing need in the borough.</p> <p>This Council therefore agrees that:</p> <ol style="list-style-type: none"> i. Other than for the purpose of analysing the responses of the public consultation to capture residents' views and any new information, the Local Plan process be paused to enable:

	<ul style="list-style-type: none"> a) further work on brown field sites, including information arising out of the Regulation 18 consultation b) further options to be considered that do not include green belt sites c) an analysis of Epsom and Ewell’s required future housing numbers based on 2018 data d) a clearer understanding of the Government’s legislative intentions in regard to protections for the green belt and the current mandatory target for housing numbers. <p>ii. Write to the MP for Epsom and Ewell calling on in him to use his influence to get the Government to abandon its use of 2014 data to calculate housing need and accept that all planning and housing policies must reflect the latest data if they are to be effective as well command the respect of the people they affect.</p>
<p>Relevant Committee and Chair of the Committee</p>	<p>Licensing and Planning Policy Committee</p> <p>Chair: Councillor Steven McCormick</p>