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Legal and Democratic Services



LICENSING AND PLANNING POLICY COMMITTEE

Thursday 15 November 2018 at 7.30 pm

Council Chamber - Epsom Town Hall

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 Graham Dudley (Chairman)
Councillor David Reeve (Vice-Chairman)
Councillor Michael Arthur MBE
Councillor Steve Bridger
Councillor Chris Frost

Councillor Rob Geleit
Councillor Tina Mountain
Councillor Martin Olney
Councillor Humphrey Reynolds

Yours sincerely

A handwritten signature in black ink that reads 'K. Beldan'.

Chief Executive

For further information, please contact Sandra Dessent, tel: 01372 732121 or email: sdessent@epsom-ewell.gov.uk

AGENDA

1. QUESTION TIME

To take any questions from members of the the Public

Please note: Members of the Public are requested to inform the Democratic Services Officer before the meeting begins if they wish to ask a verbal question to the Committee.

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 PREVIOUS MEETING (Pages 3 - 6)

The Committee is asked to confirm as a true record the Minutes of the Meeting of the Committee held on 27 September 21018 (attached) and to authorise the Chairman to sign them.

4. CIL ANNUAL REPORT REGULATION 62 STATEMENT (Pages 7 - 22)

This report has been prepared for the Committee's information. Members are asked to note the content of the latest Regulation 62 report for the year April 2017 until March 2018, which will be published on the Borough Council's website before 31 December 2018.

5. DRAFT INFRASTRUCTURE DELIVERY PLAN 2018 (Pages 23 - 108)

The Committee is asked to review and agree to the publication of the Draft Infrastructure Delivery Plan and recommend to Strategy & Resources Committee that the Kiln Lane Link be removed from the Infrastructure Delivery Plan.

6. DUTY TO CO-OPERATE ENGAGEMENT PLAN (Pages 109 - 116)

The Borough Council is in the process of forming strategic relationships with its neighbours. This report sets out a framework for further developing those relationships so that the Borough Council can submit a sound Local Plan for examination. The Committee is asked to consider the proposed engagement plan and agree to its implementation.

7. EPSOM & EWELL LOCAL PLAN: LONGMEAD & NONSUCH INDUSTRIAL ESTATES CAPACITY STUDY (Pages 117 - 186)

The Committee is asked to note the contents of the Study and agree to it being used to inform the preparation and production of the new Local Plan and the associated Transformation Masterplan.

8. PROGRESS ON THE LOCAL PLAN (Pages 187 - 220)

It is proposed that this report will be a standing agenda item to inform members on the progress being made on the review of the local plan.

**Minutes of the Meeting of the LICENSING AND PLANNING POLICY COMMITTEE
held on 27 September 2018**

PRESENT -

Councillor Graham Dudley (Chairman); ; Councillors David Reeve (appointed as Vice-Chairman with the agreement of the Committee), Michael Arthur MBE, Steve Bridger, Chris Frost, Tina Mountain, Martin Olney, Humphrey Reynolds and Vince Romagnuolo (as nominated substitute for Councillor Rob Geleit)

Absent: Councillor Rob Geleit

Officers present: Damian Roberts (Chief Operating Officer), Amardip Healy (Chief Legal Officer), Ruth Ormella (Head of Planning), Karol Jakubczyk (Planning Policy Manager), Wai-Po Poon (Senior Planning Policy Officer) and Sandra Dessent (Democratic Services Officer)

24 QUESTION TIME

No written questions were submitted and one member the public asked a question at the meeting.

25 DECLARATIONS OF INTEREST

No declarations of interest were made by Councillors regarding items on the agenda.

26 MINUTES OF PREVIOUS MEETING

The Minutes of the Meeting of the Licensing and Planning Policy Committee held on 10 July 2018 were agreed as a true record and signed by the Chairman.

27 THE REVISED NATIONAL PLANNING POLICY FRAMEWORK

The Committee received a report summarising the principle headlines and resulting key messages in the newly published National Planning Policy Framework and the implications for the Borough Council in relation to the emerging Local Plan.

The two key messages were:

- (1) The importance of robust and up-to-date evidence to support and inform local plan policies and decision making

- (2) The necessity of working with other local planning authorities to respond positively to strategic issues, with the objective of ensuring that unmet housing need is met in full

The main features that had the potential to affect the Borough Council's policies and decision making processes were considered and discussed, as follows:

- The government have reinforced the standard methodology for calculating the OAHN which currently stands at 579 units per annum for at least the next 10 years.
- As the definition for affordable housing has changed, the Council will no longer be able to pursue an affordable housing contribution for smaller sites. Whilst there is recognition of the importance of smaller sites in delivering new housing, it was no longer possible to seek affordable housing contributions for developments of 10 dwellings or fewer.

It was recognised that lack of affordable housing had long been an issue in the borough and pressure to increase density was greater some areas compared to others and that had a knock on effect on issues such as parking. The Committee was informed that the Transformation Master plan had the potential to expose issues that hadn't previously been considered.

- Through the Housing Delivery Test the Council will carry the burden of housing delivery in the borough necessitating the need to negotiate with developers to ensure that they don't hold back on building on suitable sites. This will require the Borough to explore all of the available planning tools to secure the delivery of new housing across the Borough.
- The Committee discussed potential mechanisms to facilitate housing delivery including working closely with the Planning Committee to monitor planning applications; reviewing the Council's policies that relate to the length of time developers are allowed to start development following planning approval; investigating the introduction of additional viability assessments and the use of Compulsory Purchase Orders (CPOs).
- The government is committed to delivering more new homes, faster, and places great emphasis on the optimal use of land (particularly brownfield sites) and promotion of increased density and upward extensions.

The prospect of introducing starter homes as part of the housing mix was discussed, however it was noted that their suitability as a form of affordable housing was limited (under 40's only who could only have access to particular mortgages) and unlikely to be affordable for those on the housing register.

- A new approach to viability – The Council is obligated to prepare robust evidence on development viability and set deliverable, affordable housing

targets and policies. Where the proposal is considered viable and supported by evidence the developer will be expected to make contributions towards affordable housing, unless they can clearly establish market changes.

Accordingly, the Committee:

- (1) Received the revised National Planning Policy Framework and noted the possible implications for the Borough Council in terms of the emerging Local Plan and the determination of development proposals considered through the Development Management Process;
- (3) Agreed the future decisions accord with the revised National Planning Policy Framework.

The meeting began at 7.30 pm and ended at 8.45 pm

COUNCILLOR GRAHAM DUDLEY (CHAIRMAN)

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CIL ANNUAL REPORT REGULATION 62 STATEMENT

Head of Service/Contact: Ruth Ormella, Head of Planning
Urgent Decision?(yes/no) No
If yes, reason urgent decision required: N/A
Annexes/Appendices (attached): Annexe 1: Community Infrastructure Levy Regulation 62 Report October 2018
Other available papers (not attached):

Report summary

The Charging Authority is required under Regulation 62 of the Community Infrastructure Regulations 2010 (as amended) to prepare and publish an annual report that sets out how much CIL has been spent or allocated, and how much remains available. This is to ensure the levy is open and transparent. This report serves as an information item to the Committee, enclosing the CIL annual report, prior to it being published on the Borough Council's website.

Recommendation (s)

The Committee are asked to note the content of the latest Regulation 62 Report for the year April 2017/2018

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

- 1.1 The Local Plan provides the spatial planning mechanism for the vision set out in the Sustainable Community Strategy, and it will assist in the achievement of all the Council's Key Priorities. The Community Infrastructure Levy (CIL) is the principle mechanism that will ensure that future developments contribute towards the delivery of community infrastructure that is needed to support growth.

2 Background

- 2.1 The CIL is a local levy on new development that local authorities can choose to introduce to help fund the delivery of new infrastructure across their area. The implementation of CIL is closely guided by the Community Infrastructure Levy Regulations 2010 and subsequent Amending Regulations.
- 2.2 The CIL Regulations state under Part 7 (Regulation 62 (4)) that a charging authority must prepare a report for any financial year that it collects CIL. The Regulations require that such a report must include the following information:
- 2.2.1 the total CIL receipts for the reported year;
 - 2.2.2 the total CIL expenditure for the reported year;
 - 2.2.3 summary details of CIL expenditure during the reported year including –
 - i. the items of infrastructure to which CIL (including land payments) has been applied,
 - ii. the amount of CIL expenditure on each item,
 - iii. the amount of CIL applied to repay money borrowed, including any interest, with details of the infrastructure items which that money was used to provide (wholly or in part),
 - iv. the amount of CIL applied to administrative expenses pursuant to regulation 61, and that amount expressed as a percentage of CIL collected in that year in accordance with that regulation; and
 - 2.2.4 the total amount of CIL receipts retained at the end of the reported year.
- 2.3 The latest Regulation 62 Report covers the period during April 2017 until March 2018. It is our third published Report since the introduction of CIL. A copy is included under Annexe 1.

3 The Regulation 62 Report

- 3.1 Our latest Regulation 62 Report identifies that during the reporting period (April 2017 until March 2018), we raised invoices for payment from liable developments to the total value of £1,396,926.81. This is comparable to the £1,393,214 invoiced during the previous reporting period (April 2016 – March 2017). The liable developments that were invoiced for payment are detailed under Table 1.

3.2 The Report further identifies those development proposals from which CIL receipts remained outstanding (at April 2018). These are identified under Table 2. It is noted that not all of these proposal will be implemented, and that some may be superseded by fresh applications. Nevertheless, this does provide an insight into how many additional Levy receipts may be forthcoming in the short-term.

3.3 Finally the Report sets out how collected Levy monies have been allocated (under Section 4). This was comprised of £73,150 allocated from the 5% administration fee towards Planning Policy Team salaries (directly supporting the implementation of CIL) and CIL advice, and £476,009 allocated from the 80% main CIL fund as top-up funding for the Plan E Epsom Town Centre Major Highway Improvement Scheme.

4 Financial and Manpower Implications

4.1 A staff resource is in place to ensure the day-to-day implementation of our CIL regime. This resource is directly funded from CIL funds, namely the 5% administrative fee.

4.2 Chief Finance Officer's comments: The Regulation 62 Statement at Annexe 1 details the CIL invoiced, collected and spent during 2017/18. Regulations require CIL to be applied to funding local infrastructure projects, although 5% may be used to fund the revenue cost of administering the CIL scheme.

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

5.1 A Charging Authority is required under Regulation 62 of the Community Infrastructure Levy 2010 (as amended) Regulations require that we produce a report for any financial year that we collect CIL and publish it by 31 December. The publishing of the enclosed Regulation 62 Statement will meet this requirement.

5.2 ***Monitoring Officer's comments: None arising from the contents of this report.***

6 Sustainability Policy and Community Safety Implications

6.1 None for the purposes of this report.

7 Partnerships

7.1 None for the purposes of this report.

8 Risk Assessment

8.1 As the CIL Charging and Collecting Authority we are required to be open and transparent in our activities associated with the Levy – particularly, in respect of how we distribute and spend collected monies. The publication of the Regulation 62 Statement will demonstrate transparency, fully minimising any risk that may have arisen from this process.

9 Conclusion and Recommendations

- 9.1 Members of the Committee are asked to note the content of the latest Regulation 62 Report and that it will be published on the Borough Council's website before 31 December 2018.

Ward(s) affected: (All Wards);

Epsom & Ewell Borough Council Community Infrastructure Levy Regulation 62 Report Reporting Period 2017 – 2018

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**Epsom & Ewell Borough Council
Community Infrastructure Levy
Regulation 62 Report Reporting Period 2017 – 2018
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**Epsom & Ewell Borough Council
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Introduction

The Community Infrastructure Levy (CIL) is a local tax on new development that local authorities can choose to introduce to help fund the delivery of new infrastructure across their area. The implementation of CIL is closely guided by the Community Infrastructure Levy Regulations 2010 and subsequent Amending Regulations.

The Borough Council commenced charging CIL from 1 July 2014. [The charges for Epsom and Ewell Borough Council are set out in the Community Infrastructure Levy Charging Schedule.](#) The charge is paid by developers and landowners when new development commences. Without the charge there would be a greater gap in the funding required to deliver essential infrastructure. 15% of the levy collected within a local area is allocated for spending on community infrastructure within that local area.

The Community Infrastructure Regulations state under Part 7 (Regulation 62 (4)) that a charging authority must prepare a report for any financial year that it collects CIL to ensure the Levy is open and transparent. The Regulations require that such a report must include the following information:

- a) the total CIL receipts for the reported year;
- b) the total CIL expenditure for the reported year;
- c) summary details of CIL expenditure during the reported year including –
 - i. the items of infrastructure to which CIL (including land payments) has been applied,
 - ii. the amount of CIL expenditure on each item,
 - iii. the amount of CIL applied to repay money borrowed, including any interest, with details of the infrastructure items which that money was used to provide (wholly or in part),
 - iv. the amount of CIL applied to administrative expenses pursuant to regulation 61, and that amount expressed as a percentage of CIL collected in that year in accordance with that regulation; and
- d) the total amount of CIL receipts retained at the end of the reported year.

The Regulations require that the charging authority must publish the report on its website no later than 31st December following the end of the reported year.

**Epsom & Ewell Borough Council
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Overview of Community Infrastructure Levy 2017 – 2018

1. Total CIL Receipts 2017 – 2018

During the Report Period the Borough Council raised invoices for payment from CIL liable developments totalling **£1,396,926.81**

In previous years the figures within the Regulation 62 report shown as receipts within the period had set out the amount of money collected from the CIL liable developments during the reporting period. To ensure that this report reflects what is reported within Epsom and Ewell’s financial statements for the year the receipts shown indicate the amount that has been invoiced to the various developments within the reporting year.

The table below (Table 1) sets out in detail the CIL liable developments invoiced during the Reporting Period.

Please note that a number of the developments were granted permission during previous Reporting Periods. Invoicing of liable developments takes place when the liable party submits a commencement notice, which notifies the collecting authority of their proposed start date, or when the collecting authority establishes that development has started.

Table 1: Community Infrastructure Levy Invoices Raised 2017 – 2018

Planning Ref	Address	Decision Date	Date invoiced	Amount Invoiced
15/00632 FUL	Epsom Marble 49 High Street Ewell	22/09/2015	06/04/2017	£1,875.00
16/00380/FLH	97 Ruxley Lane West Ewell	03/06/2016	26/04/2017	£1,407.90
14/01036/FUL	2 Elm Way Ewell	09/12/2014	06/04/2017	£6,630.00
0016/00215/FUL and 16/01624/COND	93-95 High Street	07/07/2016	02/05/2017	£4,870.58
14/00795/FUL	RO 72 Stoneleigh Broadway	14/07/2015	15/05/2017	£150.76

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16/00055/FUL	85 Rosebery Road Epsom	12/07/2016	05/05/2017	£9,524.82
16/00585/FUL	45 Manor Green Road	16/09/2016	25/05/2017	£20,484.38
14/01750/RES	57 Woodlands Road	21/04/2015	06/07/2017	£77,946.43
17/00161/FLH	15 Langton Avenue Ewell	05/07/2017	18/07/2017	£16,253.38
16/01693/RES	Land Adjacent Riverside Cottage Old Malden Lane, Worcester Park	08/05/2017	04/08/2017	£46,219.81
16/00166/FUL	37 - 37A Cheam Road	05/04/2017	07/09/2017	£158,225.68
15/01848/FLH	28A Woodcote Park Road	13/05/2016	25/10/2017	£26,889.71
14/01442/FUL	54 Rosebery Road	04/03/2015	31/10/2017	£27,750.00
16/01753/FUL	317 Kingston Road	17/05/2017	08/11/2017	£11,953.67
17/00515/FUL	The Star 2, Cheam Road, Ewell	01/09/2017	21/11/2017	£1,365.83
17/00461/FUL	Mill House, Old Malden Lane, Worcester Park	20/10/2017	05/12/2017	£66,868.73
16/01340/FUL	Epsom Common Working Men's Club 121 - 122 Stamford Green Epsom	06/03/2017	22/12/2017	£995.17
16/01145/FUL	Birchcroft & Hollydene Court Lane Epsom Surrey KT19 8JP	20/09/2017	15/01/2018	£105,670.17
15/00845/FUL	Salesian College Sports Ground	07/06/2016	03/01/2018	£54,966.61
17/00896/FUL	Development Site Rear Of Greenways And The Garth Windmill End Ewell	15/12/2017	11/01/2018	£69,186.49
17/00429/FUL	New Development On NESOCOT Agricultural Land Reigate Road Ewell	06/11/2017	25/01/2018	£522,610.27
17/00686/FUL	86 Reigate Road Ewell	29/09/2017	12/02/2018	£65,040.83
17/01026/FUL	27 High Street Ewell	31/01/2018	12/02/2018	£13,269.40
17/00256/FUL	5 Alexandra Road Epsom	14/09/2017	14/02/2018	£86,771.19
Total Invoiced				£1,396,926.81

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3. Potential Community Infrastructure Levy Receipts from developments granted permission

The following, Table 2, sets out in detail those liable developments that may in the future generate further CIL receipts. At the end of the reporting period (March 2018), the parties involved had yet to assume liability to pay CIL or the proposal had yet to commence. It is possible that some of these proposal will either be unimplemented, or will be superseded by fresh applications. Nevertheless, the data set out in this table provides an indication of how much CIL money may be forthcoming in the next report period (April 2018- March 2019).

Table 2: Outstanding CIL Liable Developments April 2018

Planning Ref	Address	Decision Date	Liability Notice Date	Potential CIL Amount	Status at April 2018
14/00167/FUL	Garages 1-9 Ormonde Avenue	08/01/2015	14/01/2015	£7,375.00	Awaiting Assumption of Liability
14/00857/FUL	2 Windmill Avenue Epsom	05/12/2015	01/05/2018	£12,227.68	Awaiting Assumption of Liability
14/01857/FUL	London Road Lodge, Nonsuch Park	03/06/2015	27/07/2015	£7,633.93	Awaiting Assumption of Liability
15/00377/FUL	RO 35 The Avenue	28/07/2015	13/08/2015	£56,785.71	Awaiting Assumption of Liability
15/00339/FUL	17 Riverview Road	10/08/2015	21/08/2015	£9,100.45	Awaiting Assumption of Liability
15/00336/FUL	RO 44-48 Stoneleigh Broadway	23/11/2015	23/11/2015	£50,198.14	Awaiting Assumption of Liability
15/00686/FUL	15A Upper High Street	23/11/2015	25/11/2015	£3,214.29	Awaiting Assumption of Liability
15/01021/FUL	Second Floor, 69-71 High Street	15/12/2015	12/01/2016	£14598.21	Awaiting Assumption of Liability
15/01388/FUL	Grange Mansions, Kingston Road	24/02/2016	02/03/2016	£44,745.54	Awaiting Assumption of Liability

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15/01514/FUL	11 Danetree Road	15/04/2016	20/04/2016	£8,196.43	Awaiting Assumption of Liability
15/00766/FUL	83 Manor Green Road	25/05/2016	03/08/2016	£6,910.71	Awaiting assumption of liability
15/01870/FUL	16 Kirby Close, Ewell	26/05/2016	05/07/2016	£7,102.94	Awaiting Assumption of Liability
16/00184/FLH	111 Holmwood Road	14/06/2016	20/09/2016	£15,004.96	Awaiting assumption of liability - self build extension exemption received
16/00311/FUL	1 Chestnut Avenue, Ewell	29/07/2016	14/09/2016	£11,669.12	Awaiting assumption of liability
15/00228/FUL	Land at Lord Rosebery Lodge, 6 Elm Grove	26/04/2016	05/07/2016	£28,241.07	Awaiting Commencement Notice
16/00712/FUL	1 Gadesden Road, West Ewell	04/10/2016	19/10/2016	£13,191.18	Awaiting assumption of liability
16/00296/FUL	The Roveries, 59 - 63 Cox Lane	02/03/2017	08/03/2017	£86,177.61	Awaiting Assumption of Liability & Commencement Notice
16/00588/FUL	Sands House, Hook Road, Epsom	16/03/2017	26/05/2017	£9,197.10	Awaiting Assumption of Liability & Commencement Notice
16/01379/FUL + 17/00446/REM	Land To The Rear Of 35 The Avenue Worcester Park	22/05/2017	31/05/2017	£65,745.17	Awaiting Assumption of Liability & Commencement Notice
16/01919/FUL	70 Worple Road Epsom	01/06/2017	08/06/2017	£33,915.06	Awaiting Assumption of Liability & Commencement Notice
16/00595/FUL	25 Alexandra Road	03/07/2017	03/08/2017	£107,900.00	Awaiting Assumption of Liability & Commencement Notice
15/01530/FUL	1 Chase Road Epsom	03/07/2017	06/07/2017	£173,733.59	Awaiting Assumption of Liability & Commencement Notice

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17/00353/FLH	6 Lindsay Close Epsom	10/08/2017	18/08/2017	£10,858.35	Awaiting Assumption of Liability & Commencement Notice
16/01068/FUL	57 Longdown Lane North Ewell	04/09/2017	06/09/2017	£69,520.75	Awaiting Assumption of Liability & Commencement Notice
17/00409/MMA	11 Danetree Road	24/08/2017	06/09/2017	£8,196.43	Awaiting Assumption of Liability & Commencement Notice
16/01564/FUL	80 Rosebery Road Epsom	28/09/2017	03/10/2017	£16,749.17	Awaiting Assumption of Liability & Commencement Notice
17/00188/FUL	Bar XLR 79 East Street Epsom	28/09/2017	11/10/2017	£109,402.99	Awaiting Assumption of Liability & Commencement Notice
17/00530/FUL	Wychwood Epsom Road Ewell	29/09/2017	10/10/2017	£9,586.66	Awaiting Assumption of Liability & Commencement Notice
17/00596/FUL	Antique Restorers 2 Station Approach Stoneleigh	01/11/2017	24/11/2017	£20,460.23	Awaiting Assumption of Liability & Commencement Notice
17/00121/FUL	5 Cox Lane West Ewell	08/11/2017	16/11/2017	£74,274.90	Awaiting Assumption of Liability & Commencement Notice
16/01448/FUL	2 Chase Road Epsom	20/09/2017	21/11/2017	£0.00 ¹	Awaiting Commencement Notice, social housing relief granted
17/00244/FUL	111 East Street Epsom	21/11/2017	24/11/2017	£29,238.42	Awaiting Assumption of Liability & Commencement Notice

¹ During the reporting period this development had been granted relief from the Levy on the basis that it would deliver two new affordable residential units. It is shown as being invoiced for £0 because it had been granted relief.

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17/00385/FUL	Chinese Acupuncture Centre Epsom House 10 East Street Epsom	21/11/2017	19/12/2017	£1,310.74	Awaiting Assumption of Liability & Commencement Notice
16/01325/FUL	13 Ashley Road Epsom	20/12/2017	28/12/2017	£61,993.44	Awaiting Assumption of Liability & Commencement Notice
17/00074/FLH and 17/00818/REM	6 Plantagenet Close	20/10/2017		£0.00 ²	Awaiting Commencement Notice
17/00387/FUL	YoYo DropIn Centre 24 South Street Epsom	22/01/2018	07/02/2018	£11,270.27	Awaiting Assumption of Liability & Commencement Notice
17/00932/FUL	4-5 Market Parade High Street Ewell	08/02/2018	12/02/2018	£38,640.93	Awaiting Assumption of Liability & Commencement Notice
17/00001/FUL	Development Site At Upper High Street Epsom	06/03/2018	21/03/2018	£906,559.07	Awaiting Assumption of Liability & Commencement Notice
17/01321/FUL	Ebbisham Court 34 Dorking Road Epsom	09/03/2018	21/03/2018	£10,867.76	Awaiting Assumption of Liability & Commencement Notice
17/01398/FUL	329 Hook Road Epsom	16/03/2018	21/05/2018	£6,198.65	Awaiting Assumption of Liability & Commencement Notice

² During the reporting period this development was granted relief from the Levy on the basis that it is a self-build house.

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17/01395/RES	Haddad House 91 East Street Epsom	21/03/2018	22/03/2018	£16,176.86	Awaiting Assumption of Liability & Commencement Notice
17/01574/RES	12 - 14 Grosvenor Road Epsom	21/03/2018	04/04/2018	£17,348.17	Awaiting Assumption of Liability & Commencement Notice
Total Potential CIL				£2,191,517.68	

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4. Summary of Allocated CIL Expenditure

During the report period, the Collecting Authority agreed to commit the following CIL expenditure:

- Planning Policy Team salaries and external expert technical advice on CIL= £73,150.00

The breakdown of the above expenditure being comprised of =

Planning Policy Team salaries = £71,550.00; and
Technical advice = £1,600.00

This expenditure was directly allocated from the 5% Administration Fee, which is incorporated with the Levy. Since the introduction of CIL, the Collecting Authority had collected in excess of £4,200,000.00 in CIL receipts. Of the total CIL receipts the 5% Administration Fee stood at around £210,000.00.

During the Reporting Period the allocated monies have been deployed by the Collecting Authority to fund the Planning Policy Administrator role, which sits within the Planning Policy Team. The post holder is responsible for the day-to-day administration and implementation of CIL – in terms of identifying liability, monitoring, reporting, collection and recovery (of unpaid CIL). Funding this post has ensured that the Collecting Authority provides a consistently good level of customer service and that CIL collection is undertaken in an efficient and timely manner.

- Plan E Epsom Town Centre Highway Improvements = £476,009.00
This expenditure was allocated from the main CIL fund (IE the main 80% fund). It is being used as top-up funding to support the delivery of the Plan E Epsom Town Centre Major Highway Improvement Scheme. This is a major highway improvement scheme that has its roots in the Plan E Epsom Town Centre Area Action Plan; which forms part of the Epsom & Ewell Local Plan. In addition to the expenditure allocated from our CIL fund, the Scheme has also received funding from Surrey County Council and the Coast to Capital Local Enterprise Partnership. The Scheme is being implemented by Surrey County Council.

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5. Summary of Unallocated CIL Monies

At the end of the reporting period, the following CIL is awaiting allocation:

- Main CIL (80% of all CIL) – £3,587,403.00
- Local Scheme (15% of all CIL) – £784,813.00
- Administration (5% of all CIL) – £115,304.00

DRAFT INFRASTRUCTURE DELIVERY PLAN 2018

Head of Service/Contact:	Ruth Ormella, Head of Planning
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	
Annexes/Appendices (attached):	Annexe 1: Draft Infrastructure Delivery Plan 2018.
Other available papers (not attached):	Epsom & Ewell Infrastructure Delivery Plan April 2013

Report summary

The Borough-wide Infrastructure Delivery Plan provides an assessment of the additional provision and improvements required to support future growth across the Borough.

The Infrastructure Delivery Plan takes account of evidence prepared in support of the new Local Plan and is also a key supporting document to our Community Infrastructure Levy processes. It helps to inform our charging schedule and identify funding priorities.

It is important that our Infrastructure Delivery Plan is kept up-to-date. The enclosed Draft Infrastructure Delivery Plan has been prepared to take account of our objectively assessed housing need (identified as being 579 new homes per annum) and the latest evidence outlining the Borough's future infrastructure needs.

Recommendations

The Committee is invited to:

- (1) Approve the content of the Draft Infrastructure Delivery Plan; and**
- (2) Recommend to the Strategy and Resources Committee that the Kiln Lane Link be removed from the Infrastructure Delivery Plan.**

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

- 1.1 The delivery and implementation of new development contributes towards all of the Borough Council's Key Priorities. The emerging new Local Plan will play a critical role in setting out how sustainable growth will be delivered over the next twenty years. The Infrastructure Delivery Plan (IDP) is an important piece of evidence that informs how we plan and deliver the Borough's future infrastructure needs.
- 1.2 The IDP also plays a key role in identifying and prioritising how the Borough allocates and spends monies collected through our Community Infrastructure Levy (CIL).

2 Background

What is an IDP?

- 2.1 An IDP provides an assessment of the key infrastructure requirements that will be needed to support new development in the borough over the Local Plan period. This includes physical, social and green infrastructure considered necessary to create and maintain sustainable communities.

Status and purpose of the current IDP

- 2.2 The Borough Council published its existing IDP in April 2013, which was prepared to support the introduction of the CIL. Following its publication, work has commenced on the production of a new Local Plan in order to reflect our objectively assessed housing need. It is therefore appropriate that our IDP be updated to identify the infrastructure improvements that will be needed to support our objectively assessed housing need.
- 2.3 Updating our IDP is an iterative process: as our Local Plan develops, the amount of housing the Borough can sustainably accommodate and where it could be located becomes clearer, so will the infrastructure requirements. Consequently, the draft IDP is considered a 'live' document. This reflects the current stage in the development of the Local Plan, because the Borough Council (as the local planning authority) is yet to confirm the scale of housing the Borough could sustainably deliver during the plan period.
- 2.4 Engagement with infrastructure providers has taken place to inform the preparation of the draft and will continue throughout the Local Plan process. As a 'live' document, the IDP will continue to be updated to reflect any further changes in infrastructure requirements. We anticipate that this require an annual review cycle.

- 2.5 The IDP will also help inform the Borough Council's CIL spending decisions. By providing an overview of the Borough's infrastructure requirements across the Local Plan period, the IDP will help the Borough Council direct CIL funds in a timely manner to the areas of most need. However, it should be noted that the IDP is purely an evidence base document and does not seek to prioritise the infrastructure requirements. It is the role of the Borough Council's Joint Infrastructure Group (JIG) to make recommendations on the prioritisation of need and allocation of CIL funding. Their recommendations are subsequently passed to the Borough Council's Strategy and Resources Committee for decision.
- 2.6 Following the adoption of our new Local Plan, it is intended that our IDP will be refreshed on an annual basis. This will ensure that continues to reflect accurately the Borough's infrastructure requirements.
- 2.7 To summarise, the revision of the IDP has two purposes:
- i) It will be a key piece of evidence to support the new Local Plan through the examination process; where it will demonstrate that necessary infrastructure improvements should be in place to support the identified level of housing growth.
 - ii) It will help inform and guide our CIL spending decisions

Emerging findings

- 2.8 The level of information provided for each of the infrastructure categories in the draft IDP is varied. This reflects the way in which different types of infrastructure is provided and the level of detail the infrastructure providers require for their assessments of need. For example, while a significant uplift in housebuilding will have an impact on the demand for additional school places, this demand will be influenced by the location of new development. Albeit more so at primary level rather than secondary. As such, at this stage in the preparation of our new Local Plan / IDP process, only a broad need can be identified. This will be refined over time as the location of future new development becomes clearer.
- 2.9 There are a number of infrastructure requirements emerging through the draft IDP, which are likely to have significant funding requirements. Many of these requirements will evolve over time as the development of the new Local Plan progresses.
- 2.10 Continued engagement with infrastructure providers and stakeholders is necessary so as to align their strategic requirements in the IDP as our understanding of growth evolves. This may mean that infrastructure projects which have not as yet been identified, come forward, and we need to ensure our CIL prioritisation can facilitate where appropriate.

- 2.11 Similarly, new transport infrastructure improvement schemes will also be dependent on the location of new development. While the scale of new development across the plan period will result in the need for investment in new transport infrastructure, the precise nature of the schemes is difficult to identify at this stage. Again, it will become clearer as the scale of growth and the sites needed to deliver it are allocated.
- 2.12 It is acknowledged that there are some gaps in the draft IDP as information is still being sought and/or there may not be a sufficient level of detail for infrastructure providers to make an assessment. It is anticipated that these gaps will be filled over the forthcoming months as development of our new Local Plan progresses.
- 2.13 The emerging needs identified in the draft IDP are:
- Highways – the latest draft highways modelling work suggests that while the network is already at capacity, the scale of anticipated growth is unlikely to be so significant as to prevent development coming forward. Investment will be required to manage the existing network and provide more sustainable transport choices.
 - Rail – Crossrail 2 will provide additional public transport capacity to increase housing demand. The project is still in its early stages.
 - Waste – housing growth over the past few years has placed significant pressure on the existing fleet of refuse and recycling vehicles. Additional development is highly likely to require additional infrastructure in the form of additional refuse and recycling vehicle(s).
 - Green Infrastructure – numerous schemes have been identified for the Borough's local nature reserves and Epsom Common. This will increase the capacity of existing assets in order to support the anticipated levels of planned-for growth.
 - Education – there is a need to increase capacity in education provision. At the minimum this is likely to require 2/3 additional Forms of entry at the primary level and 6 additional forms at secondary level.
 - Health – It is anticipated that there could be an additional requirement for GPs and their associated surgeries that provide for 9.9 new full time equivalent GPs during the new local plan period.
 - Parks and open spaces.
 - Police - It is anticipated that there could be a need for an additional 27 officers and 16 supporting staff members plus supporting infrastructure during the new local plan period.
 - Fire & Rescue – there is a long-term need for a replacement fire station as the existing station is no longer fit for purpose.

Infrastructure schemes not included in the Draft IDP

- 2.14 A significant scheme, the Kiln Lane Link has not been included in this latest iteration of the IDP. The proposed scheme, comprising a new road crossing under the Epsom to Waterloo Railway Line to link the A24 East Street with Longmead Road, is no longer considered to be deliverable. While the scheme would deliver some benefits these are no longer considered to outweigh the considerable cost of the scheme, which is likely to have risen in excess of the most recent estimate of £25 million (2014).
- 2.15 The Borough Council's Strategy & Resources Committee has previously agreed to reserve a proportion of our CIL funds for the Kiln Lane Link. However, as other significant infrastructure requirements are emerging through the IDP, which will help support future housing growth, it seems inappropriate to continue to reserve funds for a scheme, which is unlikely to be deliverable. It is therefore suggested that the Kiln Lane Link be removed from the IDP. This will allow funds to be redirected towards other infrastructure requirements. Subject to the Committee's agreement, this recommendation will be made to the Borough Council's Strategy & Resources Committee.

3 Financial and Manpower Implications

- 3.1 The preparation, production, examination and implementation of the Borough Council's Local Plan imposes significant demands on staff within the Planning Policy and the wider Planning Department. Those resources are necessary to secure the preparation and production of new policy and the evidence used in its support. Optimising the use of our own internal resources, over the use of external contractors, ensures that our future policies are of high quality and are fully cognizant of local conditions. The IDP is a document that benefits from this approach.
- 3.2 Staff resources have already been allocated to secure the preparation and production of the new emerging Local Plan and the implementation our CIL.
- 3.3 Funds collected through our CIL is already making a valuable contribution towards the delivery of new infrastructure. However, it should be recognised that the Levy principally provides a source of top-up or leverage funding. Consequently, the Borough Council and its partners must be realistic in their aspirations and ensure that other funding streams are secured to ensure that future infrastructure needs are met.
- 3.4 ***Chief Finance Officer's comments: Financial implications have been covered in the body of the report.***

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

4.1 National planning policy requires that the planning system be genuinely plan-led. When preparing new local plans, local planning authorities are required to plan and take full account of strategic issues. This includes planning for the delivery of an appropriate level of infrastructure improvement to support new growth. The preparation of a new IDP is a key milestone in that process. Once published the IDP will serve as a key piece of supporting evidence to be deployed in demonstrating the soundness of the new local plan.

4.2 ***Monitoring Officer's comments: None arising from the contents of this report.***

5 Sustainability Policy and Community Safety Implications

5.1 The IDP will help to deliver sustainable communities through ensuring that the necessary infrastructure required to serve these communities is identified and reflected in the Local Plan.

6 Partnerships

6.1 The Borough Council continues to work closely with infrastructure providers to ensure that the Delivery Plan meets the needs generated by future planned-for growth. On-going partnership working will continue to be important as it is a 'live document' that will continue to be updated as and when new infrastructure demands arise or projects are identified.

7 Risk Assessment

7.1 The IDP requires ongoing engagement with infrastructure providers to identify need, which will be reflected in the Local Plan. It is considered prudent not to make any significant CIL spending decisions until the Local Plan has progressed and the funds can be directed to where they are most needed.

7.2 There is a legitimate perception that community infrastructure capacity serves as a constraint to the delivery of new additional housing. However, experience demonstrates that the lack of infrastructure capacity rarely constrains the delivery of new additional housing. Nevertheless it is considered important that the local planning authority ensures that there is sufficient community infrastructure provision available to meet the needs of residents. The Borough Council will continue to explore this area of risk as the new Local Plan develops and the likely scale of future housing delivery is better understood.

8 Conclusion and Recommendations

- 8.1 The draft IDP has identified a number of emerging infrastructure needs, which will be refined over time and as the Local Plan progresses. It is recommended that the Committee supports the content of the Draft Infrastructure Delivery Plan and agrees to its publication for the purposes of supporting the emerging new Local Plan and the identification of Community Infrastructure Levy funding priorities
- 8.2 Subject to the Committee's agreement; a recommendation be made to the Borough Council's Strategy & Resources Committee that the proposed Kiln Lane Major Highway Improvement Scheme be removed from the IDP and that any funds provisionally allocated to that scheme be redirected to infrastructure improvements that better support the future sustainable growth of the Borough.

Ward(s) affected: (All Wards);

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Draft Infrastructure Delivery Plan



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1) Introduction

- 1.1 National planning policy requires that Local Plans take account and make sufficient provision for new infrastructure required to support sustainable planned-for growth. The Infrastructure Delivery Plan (IDP) is the document, which can help achieve this objective. The IDP seeks to meet this by providing an assessment of what infrastructure will be needed to support the Borough's future population and the anticipated level of growth identified in the Local Plan. This includes a range of physical, social and green infrastructure, which support places, communities, businesses and people.
- 1.2 New development within the Borough needs to be supported by such infrastructure. This may be achieved through the protection and improvement of existing infrastructure and / or through the delivery of new infrastructure alongside new development.
- 1.3 The Borough Council is not solely responsible for the provision and funding of new infrastructure and services. Other agencies, whether public, private, or voluntary, in addition to different tiers of local government all play a critical role in this process. It is the Borough Council responsibility to establish a comprehensive understanding of the Borough's existing infrastructure and the requirements that future development and population changes are likely to bring. Working closely with infrastructure providers ensures that these needs are identified and establishes how any necessary infrastructure improvements will be provided and funded.

The Epsom & Ewell Local Plan

- 1.4 Epsom and Ewell is the smallest Borough in Surrey, albeit the most densely inhabited with a population of around 70,900 residents. It is bounded to the north by Greater London (the London Borough of Sutton and the Royal Borough of Kingston upon Thames) and to the south by Mole Valley and to the east Reigate & Banstead. The Borough is mainly comprised of existing built-up areas, which are concentrated towards the north of the Borough, with the remainder being open space; 42% of the Borough is designated as Green Belt.
- 1.5 The Borough Council is currently preparing a new Local Plan. This new document takes into account changes in national planning policy; particularly in relation to anticipated population growth and housing need. The new Local Plan will be the key spatial planning document setting out how the Borough will evolve and develop over the next twenty years. Ensuring adequate infrastructure is in place and/or can be delivered over the Local Plan period is an integral part of this process. As such it is timely to review the IDP; which was first produced during 2013. The new IDP will inform the development of the

Local Plan by identifying the key infrastructure improvements required to serve the growth envisaged during the plan period.

- 1.6 The IDP also has an important relationship with the Community Infrastructure Levy (CIL). CIL is the primary way in which Councils can raise funds from developers to help contribute towards the infrastructure needed to support new development. The Council has been charging CIL since mid-2014 and produced its first IDP in 2013, to facilitate the introduction of this regime. The IDP provides the justification for CIL by demonstrating the likely infrastructure needs of the Borough as a result of new development. The IDP also informs CIL spending decisions (although it does not prioritise schemes). It helps to ensure funds are allocated in the most efficient manner.
- 1.7 It should be noted that CIL is a source of 'top up' funding, rather than the sole source of funding and can often be used to attract other sources of funding to schemes.
- 1.8 It is emphasised that the IDP can only provide a snapshot in time of the Borough's infrastructure requirements. As such it is intended to be regularly updated. For example as the scale of housing the Borough could sustainably deliver and its location become clearer through progress with the Local Plan, or as new evidence and/or changes to infrastructure provision occur. The IDP should therefore be viewed as a 'living' document.

Stages in the production of the IDP

- 1.9 The preparation and review of an IDP is an iterative process and the main tasks are set out below:
 - 1) Identify the infrastructure types/services the IDP will assess, including their providers.
 - 2) Identify the predicted population growth and demographic changes alongside the anticipated scale of housing and economic growth for the Borough. Sources of information will include the Office for National Statistics (ONS) and information from the Borough's emerging Local Plan.
 - 3) Gather evidence on existing infrastructure provision and identify if it is fit for existing needs. This can be achieved through using readily available evidence from within the Council and infrastructure providers such as business plans and estates strategies. Information from the previous IDP will also be a useful source of reference.
 - 4) Identify future infrastructure requirements to support new development and the Borough's likely future population. This will require liaising with infrastructure providers to identify such needs. Such a process will be iterative; as the Local Plan progresses and

the scale of growth and the sites that will deliver this are identified, the infrastructure requirements and timing of their delivery will become clearer.

- 5) Where possible provide an indication of the potential costs and sources of funding to provide such infrastructure

Current Stage

- 1.10 The Borough Council continues to make progress in preparation and production of the new Local Plan. It is currently at the stage of identifying the amount of housing growth the Borough could sustainability accommodate. To date engagement with infrastructure providers has taken place at a strategic level, i.e. assessing the potential impact on infrastructure if a higher level of growth (reflecting the identified need) was delivered over the Local Plan period. As a result, the information contained in this working draft of the IDP is quite strategic in nature. Further engagement will take place with infrastructure providers as the Local Plan progresses and housing numbers and specific sites are identified. The IDP will be updated to reflect these findings.

2) Infrastructure types and service providers

Types of infrastructure and service providers

2.1 The implementation of new developments and the Borough's growing population will require the delivery of a range of physical, social and green infrastructure in order to meet needs. The types of infrastructure assessed in the IDP are set out below. The list is in no order of priority.

Table 1: Types of infrastructure assessed within the IDP

Infrastructure Sector	Infrastructure Types	Service Provider
Transport Infrastructure	Local Roads	Surrey County Council
	Buses	Surrey County Council
	Rail	Network Rail, South West Railway, Southern Railway, Transport for London (TfL), Crossrail 2
	Walking and Cycle	Surrey County Council Epsom & Ewell Borough Council
	Car Parking	Epsom & Ewell Borough Council
	Electric Vehicle Charging points	Surrey County Council Epsom & Ewell Borough Council
	Utilities and physical infrastructure	Water supply and sewerage
Electricity		National Grid UK Power Networks
Gas		National Grid SGN (Scotia Gas Network)
Flood risk management		Surrey County Council Epsom & Ewell Borough Council
Waste management and disposal		Surrey County Council Epsom & Ewell Borough Council
Social and Community Infrastructure	Early Years Provision	Surrey County Council
	Primary and Secondary education	Surrey County Council
	Post 16 education/ Sixth Form	Surrey County Council

	General Practice (GP) and community health infrastructure	Surrey Heartlands Sustainability and Transformation (STP) Area
	Adult Social care	Surrey County Council Health & Social Care
	Sports facilities	Epsom & Ewell Borough Council
	Community Centres	Epsom & Ewell Borough Council
	Cemeteries	Epsom & Ewell Borough Council
	Community Safety	Epsom & Ewell Borough Council
Emergency Services	Police	Surrey Police
	Ambulance	South East Coast Ambulance Service (SECAmbs)
	Fire Service	Surrey Fire and Rescue Service
Green Infrastructure	Parks and Gardens	Epsom & Ewell Borough Council
	Local Nature Reserves	Epsom & Ewell Borough Council
	Epsom Common	Epsom & Ewell Borough Council

- 2.2 Demand for infrastructure is not always uniform across the Borough. Some infrastructure assets and facilities only serve localised catchments whereas others (e.g. hospitals) have catchments that extend beyond the Borough's administrative boundary. This has been taken into account when assessing and considering overall community infrastructure needs and identifying areas of surplus supply or deficiency.

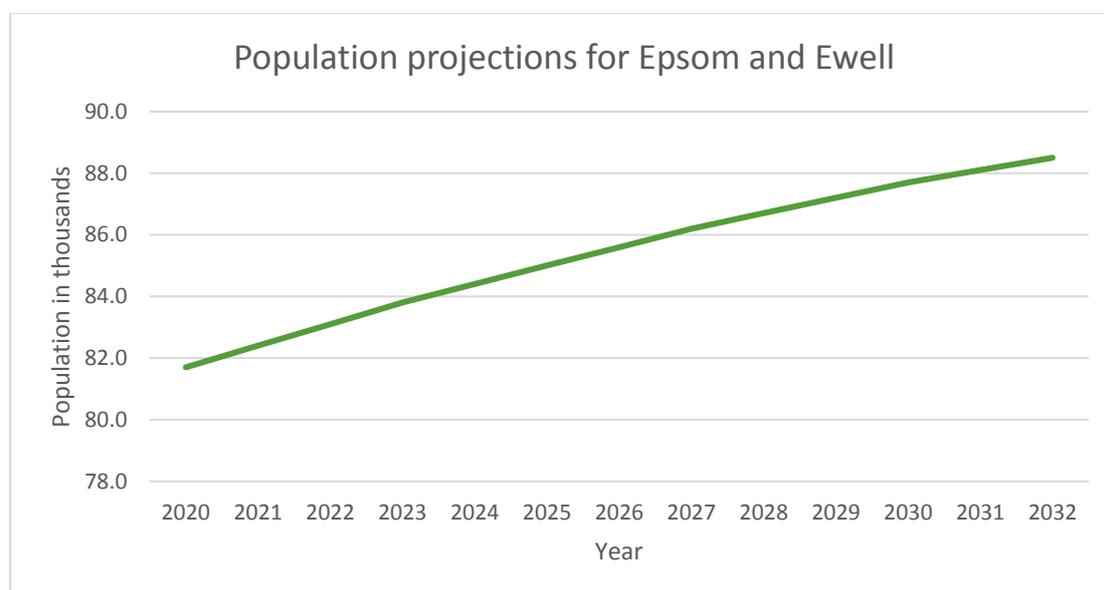
3) Future demographic and development changes affecting infrastructure

3.1 To understand the Borough's future infrastructure requirements it is essential to assess the impacts of demographic change (including changes in population and age); the anticipated levels of development (in particular housing and employment); and the impacts of climate change in the context of current infrastructure. The period that will be assessed extends until 2032. This coincides with the Local Plan period.

Population Growth

3.2 Data from the 2011 Census puts the Borough's population at 75,102 and the latest [subnational population projections \(2016\)](#) estimate this to increase to 88,500 by 2032. Figure 1 shows this data in graphical form estimating that the population will increase by 9,500 from 2018 to 2032. However, it must be noted that these are un-constrained estimates, which do not take into account future development. It is possible that a 'dwelling constrained' population projection would result in a lower figure.

Figure 1: Estimated population growth for the Borough from 2018 to 2032



Data source: ONS subnational population projections 2016

3.3 Any future population increase will need to be supported by infrastructure. Some of this demand is likely to be met through the appropriate existing infrastructure, while some may necessitate entirely new provision. Changes in the population's age group structure can also have a direct impact on some infrastructure service provision. For

example a rise in the birth rate has the potential impact upon the need for increased education infrastructure. In contrast an ageing resident population could result in a demand for more adult social care.

- 3.4 The population projections in 4 year age groupings is set out in Table 2 below. This allows an analysis of how the population age structure will evolve. The data shows that future birth rates are predicted to stabilise while the increased birth rate experienced over the past few years will result in an increase in the 'younger' population aged 10-24 in the future. There is also estimated to be an increase in older age groupings, particularly those in the 80+ age groups. Slight decreases are seen in some groups over a 14 year period, for example in the 25-39 age categories. This suggests that there will be increasing pressure on education infrastructure in the very near future along with potential pressure on health infrastructure and adult social care. Fluctuations in the age groupings will mean that some infrastructure providers will need to be particularly responsive.

Table 2: Estimated population growth (in thousands) shown by age grouping

Age Range	Year								% Change Between 2018 to 2032
	2018	2020	2022	2024	2026	2028	2030	2032	
0-4	5	5.1	5.1	5.1	5.1	5.1	5.1	5	0
5-9	5.4	5.5	5.5	5.5	5.5	5.5	5.5	5.5	+1.8
10-14	5	5.4	5.7	5.9	5.9	5.8	5.8	5.8	+16
15-19	4.7	4.7	5.0	5.3	5.6	5.9	5.9	5.8	+23.4
20-24	4	3.9	3.8	3.8	3.9	4.1	4.4	4.6	+15
25-29	4.1	4.1	3.9	3.9	3.8	3.6	3.7	3.9	-4.9
30-34	4.6	4.6	4.7	4.6	4.5	4.4	4.3	4.2	-8.7
35-39	5.7	5.6	5.6	5.6	5.6	5.6	5.5	5.3	-7
40-44	5.8	6.1	6.4	6.3	6.3	6.2	6.2	6.2	+6.9
45-49	5.9	6.0	5.9	6	6.3	6.4	6.4	6.3	+6.8
50-54	6	5.8	5.8	5.9	5.9	5.8	6.1	6.3	+5
55-59	5.3	5.6	5.8	5.7	5.7	5.6	5.7	5.6	+5.7
60-64	4.1	4.4	4.7	5.1	5.3	5.4	5.3	5.3	+29.3
65-69	4	3.8	3.8	4	4.3	4.6	4.9	5.1	+27.5
70-74	3.8	4.0	3.8	3.6	3.5	3.6	3.8	4.1	+7.9
75-79	2.7	2.9	3.3	3.6	3.6	3.4	3.2	3.3	+22.2
80-84	2.1	2.1	2.2	2.4	2.6	3.0	3.1	3	+42.9
85-89	1.3	1.4	1.4	1.5	1.5	1.6	1.8	2.1	+61.5
90+	0.7	0.8	0.8	0.8	0.9	0.9	1	1.1	+57.1
All ages	80.4	81.7	83.1	84.4	85.6	86.7	87.7	88.5	

Data source: ONS subnational population projections 2016

Household Growth Projections

3.5 The ONS released their [2016 based household projections](#) in September 2018. These projections are published every two years using the latest subnational population projection data available. They provide an indication of the number of additional households that could form if recent demographic trends were to continue. The latest projections are based on the 2016 subnational population projections as set out in the earlier section. The headline outcome from this data that the number of households is projected to increase at a slower rate of growth than previously anticipated.

3.6 For the Borough of Epsom and Ewell the forecasts show the following:

Percentage change in number of households from 2016 to 2041 = 20.2%

Number of households in 2016 = 30,870

Number of households in 2032 = 35,000

Number of households in 2041 = 37,110

Change in number of households (2016 to 2041) = 6,240

3.7 It should be noted that the household projections are not forecasts. They are projections of how many households could form if the population maintained the same level of growth as it did between 2011 and 2016; and kept forming households as it did between 2001 and 2011. The ONS specifically state that the projections should be used as a starting point for calculating the future housing needs of a local area.

3.8 It is noted that that as the latest household projections anticipate a lower level of growth than previous forecasts, it is possible that there will be implications in how the Borough Council plans for future development. The projections are likely to influence the scale of the Borough's housing target. This matter is discussed in more detail below.

Potential Future Development within the Borough

3.9 The emerging new Local Plan takes full account of the changes to national planning policy and in particular the potential for significantly increased housing requirement derived through the government's standard method. The new Local Plan will set out the spatial vision for the Borough, identifying how it will evolve and develop during the plan period. Ensuring adequate infrastructure is in place and/or can be delivered to serve both the existing and expected future population, will be an integral part of the spatial vision. As such, the IDP has an important role in implementing the Local Plan.

- 3.10 Progress is continually being made with the new Local Plan. Currently the capacity of the Borough to sustainably accommodate additional housing is being considered. The government's standard method for calculating objective assessed housing need identifies a housing requirement (for the Borough) of 579 additional homes each year. Set against the Borough's previous housing target to deliver 181 new homes per year the requirement has the potential to translate into a new target that results in a significant step change in housing delivery. Inevitably this will have implications for infrastructure provision.
- 3.11 However, as the government's standard method uses household growth projections as a key component of its formula calculation, the recently published ONS household growth projections may influence the scale of housing requirement. This is because they are lower than the previous forecasts. Regardless of the recent projections the government remains committed to the delivery of more housing faster. As such, it is consider prudent for the Borough Council to await further government announcements, anticipated by the end of 2018, before planning for reduced housing requirement.
- 3.12 Key figures:
Existing Core Strategy housing target = 181 dwellings per annum
2017 Standardised methodology target = 579 dwellings per annum
2018 Standardised methodology target using 2016 based household projections = 372 dwellings per annum
- 3.13 Whatever the resulting target, meeting any increase in the annual housing building target will be challenging. With the Borough being mostly comprised of existing built up areas, strategic open spaces or Green Belt, the supply of available development sites is now extremely limited. In response the Borough Council is considering options for increasing housing delivery.
- 3.14 One of the factors in considering whether an increased housing target can be achieved is the level of infrastructure that would be required to support this increase in housing numbers. This first draft of the IDP considers the higher housing requirement (579 new homes per annum). Engagement with infrastructure providers has helped to identify what impact this level of housing would have on the services they provide. This high-level engagement helps to identify the main areas of infrastructure need.
- 3.15 In economic terms the Borough benefits from the employment opportunities and commercial activity which takes place in and around the main town centre, Epsom and the secondary centres of Ewell Village and Stoneleigh. There are also two industrial estates Nonsuch and Longmead which are the focus of most of the Borough's B2 and B8 commercial activity. Set against the projected significant housing

increase it is unlikely that the Borough will be seeking to allocate additional employment land but rather intensify the existing uses to provide the Borough's economic prosperity. This will be taken into account when identifying the impact on infrastructure requirements.

Calculating Demand from New Development

3.16 In order to estimate the demand for new infrastructure it is necessary to estimate how many people will live in the new homes which will be built in the Borough during the plan period. While the number of new homes that can sustainably be delivered will be set out in the Local Plan, it is proposed to use the Borough's identified housing requirement of 579 new homes per year as a starting point.

3.17 An estimate of the population living in the new development require a number of assumptions to be made. Firstly as the need and demand for housing within the Borough is challenging, it is therefore reasonable to assume that any new houses built within the Borough will be occupied. Estimates of the size of future housing can be made based on the needs identified in the Borough's Strategic Housing market Assessment (SHMA). However the number of people who will live in these new homes is difficult to predict. In order to provide an estimate, data from the 2011 household census has been used. This suggests that the average household size (persons per household) was 2.52. The calculations are set out below in Table 3.

Table 3: Population growth related to new development

Year	Number of dwellings	Cumulative population yield (no of units x average occupancy at 2.52)
2020	579	1,459
2021	579	2,918
2022	579	4,377
2023	579	5,836
2024	579	7,295
2025	579	8,754
2026	579	10,214
2027	579	11,673
2028	579	13,132
2029	579	14,591
2030	579	16,050
2031	579	17,509
2032	579	18,968
Total	7527	18,968

- 3.18 It can be seen that additional housing, delivered at a rate of 579 new homes per year with an assumed occupancy rate of 2.52 would deliver an estimated 18,968 new or additional residents. This is greater than the population increase predicted by the subnational population projections, which forecast an increase of 9,500 additional residents. Therefore it can be seen that the amount of housing that will be built in the Borough in the future will have a significant impact on infrastructure requirements.
- 3.19 It is important to highlight that the above are broad assumptions. It is also worth highlighting that the size of the new homes are likely to be smaller, which could equate to them being occupied by fewer residents. Nevertheless, the forecast from Table 3 provides a useful starting point to assess the levels of infrastructure which could be required in the future. Again, as further details emerge through the new Local Plan process, the target and the infrastructure requirements to accompany the Borough's population will be refined.

Estimating future infrastructure requirements

- 3.20 Although it is possible to estimate the future demand for social and community infrastructure on the basis of a pro-rata calculation against population and household growth, it is important to acknowledge that such an approach has its limitations. Most social and community infrastructure is designed to meet local geographic need and therefore it may be possible to prepare a quantitative assessment of need relative to population. However, it is more difficult to assess and quantify shortfalls/ oversupply associated with transport infrastructure and social and community infrastructure that meet the needs of a strategic catchment area. It is equally difficult to assess infrastructure that is provided by the private sector. Two local examples include Epsom General Hospital, which is part of the Epsom and St Helier University Hospitals NHS Trust, and the University for the Creative Arts; both serve a far wider catchment area than the Borough's administrative boundary. This does not mean that under-provision (for these sectors) is either a viable or recommended option but it is recognition of the limitations of applying ratios to facilities and using simple models to assess infrastructure shortfalls.

- 3.21 As the Borough covers a relatively small geographical area it is inevitable that some infrastructure will be used by residents living in neighbouring areas. Conversely, the Borough's residents are also likely to use infrastructure hosted in neighbouring areas. For example, parental choice has considerably widened the catchment areas of many of the Borough schools, in particular drawing students from the neighbouring London authorities. This influence is most likely to be clearly understood by the infrastructure/ service providers and demonstrates the importance of liaising with providers throughout the IDP and Local Plan process.

4) Assessment of infrastructure capacity and the funding gap

- 4.1 This section of the IDP considers the different types of infrastructure which serves the Borough's population and is structured in the following way.
- 4.2 Where relevant an overview of the existing infrastructure provision is provided alongside the identification of any gaps and whether these are being addressed, whether this is planned, where it is not and the likelihood of delivery. Where possible standards of provision have been identified. It has been compiled through a process of desktop research, which examines the delivery strategies of key partners. The assessment also uses information supplied by key infrastructure providers.
- 4.3 Engagement with infrastructure providers has taken place, reflective of the current stage in the development of the Local Plan. The housing need figure identified by the NPPF standard methodology has been used as starting point for assessing the impact on infrastructure. The need figure being the delivery of 579 new housing units per year (it is acknowledged that this need may be subject to change). Infrastructure providers have been consulted as to how they would respond to this significantly increased need and whether any additional infrastructure or improvements would be required. Annex 1 provides a list of all the identified infrastructure requirements that have been identified to date.
- 4.4 As the Local Plan evolves and the scale of housing provision and associated sites are identified, consultation will be undertaken as necessary with infrastructure providers which will help to further refine the likely infrastructure requirements for the Local Plan period.

Transport Infrastructure

Local Road Network

Lead Agency:

Surrey County Council

Evidence Base:

Draft Strategic Highways Assessment 2018
Epsom & Ewell Local Transport Strategy 2014 and Forward Programme
(updated 2018 and due for full review following the progress of the Local Plan)

Strategic context:

The Borough does not contain any motorways or trunk roads but does have a number of principal A roads. The main highway through Epsom and Ewell is the A24 between Leatherhead (south-west) and the London Borough of Sutton (north-east). The other major highways are the A240 between Banstead (south-east) and Kingston (north west), the Epsom Town Centre one way system, the A232 to Croydon and the B280 radiating to the west of Epsom Town Centre.

Congestion on the highway network leads to vehicle delay. It can also form a barrier to movement and contribute to the potential risk of increased traffic collisions and resultant casualties. Congestion affects air quality and the Borough currently has one designated Air Quality Management Area (AQMA) which is within Ewell Village.

The population has a relatively high level of car ownership, with a large number of car borne trips in the Epsom area being short trips (within 5km). The travel patterns of residents and commuters travelling into the Borough give rise to peak hour traffic congestion on particular parts of the road network in the Borough. This is particularly evident during the morning rush hour.

Existing provision

N/A

Gaps in provision:

Surrey County Council have produced Local Transport Strategies and Forward Programmes for each of the Surrey Boroughs and Districts. These are live documents which are intended to be updated at regular intervals. The Transport Strategy provides a commentary on the transport provision and problems in the borough while the Forward Programme lists the transport infrastructure that the County would like to see implemented, subject to funding. For Epsom & Ewell an updated version is due to be ratified in December 2018 although a full review will be undertaken once the Local Plan has reached a more advanced stage to ensure the schemes help mitigate the impacts of proposed new development. In general, the schemes are not intended to provide additional network capacity but seek to manage the existing network and provide more sustainable transport choices.

Planned Provision:

Within Epsom Town Centre the Plan E highways improvements is a major scheme which is currently underway. The scheme is an element of the Plan E Area Action Plan for Epsom Town Centre, which seeks to improve the balance between vehicles and pedestrians to reduce the dominance and detrimental effect of traffic and reduce the number of vehicles that pass through the town centre thereby improving flow.

Impact of Potential Development Proposals:

The Borough Council commissioned Surrey County Council to assess the highways impact of a number of development options, the findings of which will inform the development of the Local Plan. The County's strategic transport model SINTRAM was used to compare the potential development scenarios and identify their impact on the highways. The study is currently in draft form but its emerging findings provide some useful intelligence on the need for future highways infrastructure.

The study considered the impact of the three development scenarios, against a baseline position (scenario 1 - this included sites under construction and those with planning permission). The development scenarios involved delivering different amount of housing in a variety of locations across the borough.

As anticipated the preliminary findings show that the total vehicle trips are the lowest for scenario 1 and increase with each scenario so that the greatest number of trips are in scenario 4. With total distance and travel time being greater during the AM peak hour, it is more congested than the PM peak hour, as peak commuting and education escort trips coincide. Scenario 4 causes the most congestion for both the AM and PM peak hours although less so for the PM peak as the network is not so congested and can therefore more easily accommodate any change / growth.

The study states that the Borough is already congested and even small changes in total congestion causes road users to change their routes to avoid the delay. As expected the largest junction delay occurs where major roads intersect due to the volume of vehicle flow traversing. However, it was shown that many junctions with particularly large delay values are shown to be operating over capacity in all scenarios.

The study concludes that the impacts of each of the scenarios are not considered sufficiently severe to eliminate any one scenario on highway impact grounds. However mitigation should be sought which reduces the impact of increased housing numbers. A number of roads and junctions have been forecast to be under stress, where road users will be subject to considerable delay and these have been defined as 'hotspots'. These hotspots in particular are likely to require mitigation to reduce the impact of any development in the local area. The majority of these locations already experience congestions issues although this will be exacerbated by additional

trips arising from development sites. However, given the land and severance constraints of the existing highways network within Epsom & Ewell, it is likely that mitigation will predominantly focus on reducing the reliance on the private car. For example this could be improving the connectivity to local amenities which can be reached along pedestrian and cycle networks. It is also recommended that mitigation is not limited to just the occupiers of any new development sites.

Once the development sites emerge as the Local Plan develops, mitigation schemes will be identified and included in this IDP to address the impact of the new developments. This is likely to build upon those schemes being drawn up as part of the Epsom & Ewell Forward Programme (which will be reviewed as the Local Plan develops). This is likely to focus on reducing reliance on the private car.

Costs and Funding Sources:

These are yet to be determined. The potential schemes and their costs will become clearer as the Local Plan progresses and the Epsom & Ewell Forward Programme is updated in line with this process. An indication of costs can be gained from the Epsom & Ewell Forward Programme (interim update 2018). Schemes within this which have been identified as potentially being part funded by CIL total as a minimum approximately £50 million. Other funding sources include the Local Transport Plan capital programme and Local Economic Partnership (LEP) funding.

Bus network

Lead Agency:

Surrey County Council

Evidence Base:

Epsom & Ewell Local Transport Strategy 2014 and Forward Programme (updated 2018 and due for full review following the progress of the Local Plan)

Strategic context:

The local bus network is an integral part of the transport system in Epsom and Ewell providing valuable transport provision across the Borough and supporting the economy. As the Borough borders London it is relatively well served by bus services.

The bus services within the Borough are run by both Transport for London (TfL) and external operators subsidised by Surrey County Council.

Existing provision

The Borough as a whole is considered to have a relatively good bus network providing frequent services to a number of destinations within and outside of the Borough.

With some exceptions, bus services connecting centres within the Borough and cross boundary typically run every 30 minutes and include:

- E5: Langley Vale, Epsom, Longmead and Watersedge
- E9: Epsom, Manor Park, Livingstone Park, Clarendon Park
- E10: Epsom Station to Noble Park
- E16: Epsom, Stoneleigh, Worcester Park
- 406: Epsom, Ewell, Kingston
- 408: Epsom to Cobham (30 mins at am peak, 1 hour intervals after)
- 418: Epsom, West Ewell, Kingston
- 460/480: Epsom, Tadworth, Walton on Thames, Redhill, Gatwick Airport
- 467: Epsom, Ewell, Hook (30 mins at am peak, 1 hour intervals after)
- 470: Epsom, Colliers Wood
- 479: Epsom, Bookham, Leatherhead, Guildford

The Borough benefits from services provided by London Buses, all of which operate the London Oyster Card System. Services offered by London Buses comprise the majority of departures in the Borough.

Gaps in provision:

The Borough is well served in terms of bus frequency and number of destinations. However, journey times of some bus services can be unreliable on the approaches to Epsom town centre due to traffic congestion causing long journey times and unreliable timetables, making travelling by bus less attractive.

Operating hours can be limited, making travelling by bus difficult during the evenings, for example.

Planned Provision:

Surrey County Council have identified a transport package of sustainable measures, which includes bus improvement measures on key corridors between Epsom, Ewell and Banstead. A recent bid to the Coast to Capital LEP for potential funding was unsuccessful. Nevertheless, Surrey County Council will continue to implement improvements to bus infrastructure as funding becomes available.

Improvement measures will include:

- Improvements to bus stop infrastructure along bus corridors including destinations along route – raising kerbing to improve accessibility, provision of seating at bus stops, provision of bus shelters, standardising bus stop layout and alignment to increase reliability and other information and accessibility improvements
- Real Time Passenger Information (RTPI) – equipping bus routes that are not yet on the Surrey RTPI system, installing displays at bus stops, providing information at bus stops on how to obtain RTPI on smart phones/mobile phones or internet
- Surrey-wide smartcard ticketing system working in partnership with bus operators
- Intelligent bus priority and other traffic management measures along bus routes
- Accessibility/safety improvements at railway stations (working in partnership with train operating companies)
- Provision of Community Transport in the area to assist with transport for those who may have mobility problems or other issues, which may mean they cannot access public transport.

Impact of development Proposals:

As the Local Plan progresses, schemes in the Epsom & Ewell forward programme will be identified and updated accordingly.

Costs and Funding Sources:

These are yet to be determined. The potential schemes and their costs will become clearer as the Local Plan progresses and the Epsom & Ewell Forward Programme is updated in line with this. An indication of costs can be gained from the Epsom & Ewell Forward Programme (interim update 2018). Schemes relating to improvements to the local bus networks, which have been identified as potentially being part funded by CIL total approximately £1.55 million (note this figure has also been included in the schemes identified for the local road network so should not be double counted). Other funding sources identified include the Local Transport Plan capital programme and LEP funding.

Rail network (including Crossrail 2)

Lead Agency:

Network Rail
South Western Railways
Southern Railways
Transport for London (TfL)
Cross Rail 2

Evidence Base:

Cross Rail 2 website
Epsom & Ewell Local Transport Strategy 2014

Strategic context:

The Borough is served by four stations; Epsom, Ewell East, Ewell West and Stoneleigh.

Epsom station is directly connected to Wimbledon, Clapham Junction, London Waterloo, London Victoria and London Bridge to the North as well as to Sutton and Croydon to the East, Leatherhead and Dorking to the South and Guildford to the West.

Ewell West and Stoneleigh are connected to Wimbledon, Clapham Junction and London Waterloo. Ewell East is connected to Sutton, Croydon, Clapham Junction, London Victoria and London Bridge.

There is potential for the Borough to be served by Crossrail 2, which is a new railway serving London and the wider South East that could be open by 2030. It may provide a long term solution to the severe overcrowding on the South West Main Line that is forecast to nearly double in the future. Crossrail 2 would free-up capacity on the railway network, helping to reduce congestion, and would enable more local services into central London that bypass the most congested stations. The project is currently at the early stages of planning and a formal decision to build it has yet to be made. Formal permission, via a new Act of Parliament, is expected to be sought from government to build the new line in 2020. That process is anticipated to take around 2 years. Construction could start around 2023 with the new line opening from the early 2030s.

Existing provision

Statistics on station usage in the Borough are set out below:

Station	Annual Usage*					Change 2012- 17(%)
	2012/13	2013/14	2014/15	2015/16	2016/17	
Epsom	3,740,752	3,962,714	4,116,624	4,183,184	4,059,314	+8.5
Ewell West	1,216,888	1,252,868	1,253,530	1,447,484	1,511,266	+24.2
Ewell East	461,768	504,194	528,292	616,606	560,400	+21.4
Stoneleigh	1,164,786	1,176,708	1,183,976	1,119,030	1,069,762	-8.2

*Estimates of station usage consist of the total numbers of people travelling from or to the station (entries and exits)

Source: Office of Rail and Road (2017)

Epsom Station is the busiest railway station in the Borough, with over 4 million passenger movements each year. While this decreased slightly in 2016/17 compared to the previous year, there has been an 8.5% increase over a 5 year period. A number of town centre developments have been completed in recent years, which may have contributed to the increased station usage. Ewell West and East saw a significant increase in users over a 5 year period at 24.2% and 21.4% respectively. This may be due to these stations being located within Oyster Zone 6 (whereas Epsom is outside of the zones). Stoneleigh was the only station to experience a decline (-8.2%).

Epsom Station has recently been refurbished to provide improved passenger facilities. It is important that capacity is maintained on London bound trains and that rail services to and from Epsom Town Centre continue to make it an attractive location for businesses and retail uses. Crossrail 2 has the potential to help deliver such improvements.

Ewell West and Stoneleigh had their platforms lengthened in 2013/14 to facilitate the use of longer 10 car trains.

There are a number of stations immediately outside of the Borough which residents of Epsom and Ewell are likely to use. These stations include Worcester Park, Cheam, Tattenham Corner, Epsom Downs and Ashted. No specific improvements have been identified for these stations.

Gaps in provision:

None identified although Crossrail 2 would potentially address overcrowding issues.

Planned Provision:

Crossrail 2 would free up capacity on the railway network helping to reduce congestion, and enabling more local services to be run to central London that bypass the most congested stations. Trains would run South West of Wimbledon, serving lines to Epsom, Chessington South, Hampton Court and Shepperton.

All stations on the proposed South West branches would benefit from an increased frequency of trains into London. On the Epsom branch, at least 4 Crossrail 2 trains would operate in each direction, calling at Ewell West, Stoneleigh and Worcester Park. This would significantly increase capacity along this section of the route allowing a combination of Crossrail 2 and existing suburban trains to operate. The realisation of Crossrail 2 would capacity for up to 8 trains per hour in each direction – travelling to both Waterloo (as existing) and Euston (utilising Crossrail 2 beyond Wimbledon). Existing services via Sutton to Victoria and London Bridge would also be retained. Some station works would also be required at Epsom to support Crossrail 2 services, including track changes and work to lengthen the existing platforms.

The South Western Railway has made a bid to the Department of Transport's Access for All Programme, seeking funding for a proposal to introduce step-free access at Stoneleigh Railway Station. The Borough Council supports this bid. The proposal will improve access to the Station for the elderly, those with impaired mobility and those using pushchairs and buggies.

Impact of Potential Development Proposals:

It is likely that new development will increase passenger demand and as a consequence improvements will be needed to maintain capacity.

TfL responded to the Local Plan Issues and Options consultation (2017) stating that Crossrail 2 will provide additional public transport capacity to support housing growth along the Epsom, Ewell West, Stoneleigh rail corridor, particularly within the catchment of stations that will benefit from improved services.

The proposed access improvements at Stoneleigh Station will increase its capacity to accommodate more passengers.

Costs and Funding Sources:

Funding for the construction of Crossrail 2 is yet to be identified as the project is still in the early stages.

The Department of Transport's Access for All Programme provides a source of funding for the access improvements at Stoneleigh Station. The Community Infrastructure Levy could make a modest "top-up" contribution to the proposal.

Walking and Cycle provision

Lead Agency:

Surrey County Council
Epsom & Ewell Borough Council

Strategic context:

Epsom and Ewell has a good network of paths and facilities for pedestrians and many community facilities are within reasonable walking distance of railway stations and residential areas. However, some of the infrastructure is ageing and/or requires updating. Some pavements can be narrow making them difficult to use safely. Furthermore, the impact of traffic congestion and carbon emissions can impact on environmental quality and act as barriers to pedestrian movement, for example in Ewell Village and along the A24. Plan E identifies a good pedestrian environment as vital to achieving healthy and successful town centre, and there is a need to maintain and improve pedestrian routes.

Epsom and Ewell has a good level of cycling infrastructure and there are a number of cycle routes across the Borough, providing benefits in leisure, recreation and health. The routes provide inter-urban access to the Green Belt and areas of open countryside which lie to the east, west and south of the borough.

The pedestrian and cycle routes form a valued component of the Borough's emerging Green Infrastructure Network, which is being identified through the emerging Local Plan.

Gaps in provision:

The majority of cycle routes are on road and there are a number of gaps in cycling infrastructure that Surrey County Council have identified in the Forward Programme. This is intended to be updated as sites emerge through the Local Plan process.

Planned Provision:

As above.

Impact of Potential Development Proposals:

This will become clearer as sites emerge through the Local Plan process.

Costs and Funding Sources:

These are yet to be determined. The possible improvement schemes and their costs will become clearer as the Local Plan progresses and the Epsom & Ewell Forward Programme is updated in line with this. An indication of costs can be gained from the Epsom & Ewell Forward Programme (interim update 2018). Schemes relating to improvements to the Borough's cycle / pedestrian networks, which have been identified as potentially being part funded by CIL total approximately £8 million (note this figure has also been included in the schemes identified for the local road network so should not be double counted). Other funding sources identified include the Local Transport Plan capital programme and Local Economic Partnership (LEP) funding.

Car parking

Lead Agency:

Epsom & Ewell Borough Council
 Surrey County Council

Evidence Base:

Epsom & Ewell Borough Parking Strategy 2012

Strategic context:

The Borough's mix of uses, high level of accessibility and car ownership, the presence of historic streets with limited off-street parking provision and the proximity to greater London results in a unique set of parking issues.

Epsom Town Centre and the surrounding areas experience high levels of parking demand.

Evidence shows that unlawful on-street parking at key points on the highway network through Epsom Town Centre are a major cause of congestion and travel delay.

Existing provision:

The Borough Council owns and manages 12 public car parks within the Borough. Over recent years, a number of these car parks have been improved through the introduction of 'barrier controlled' management measures. Other improvements have been introduced in parallel with these measures – including enhancements to access arrangements, lighting and widening of parking bays. These have helped make the public parking provision safer and more attractive to users.

Provision is as follows:

<i>Car Park</i>	<i>Total Spaces</i>	<i>Spaces for Blue Badge Use</i>
Ashley Centre Multi-Storey	660 (Monday to Sunday 24 hours) Spaces for motorbikes and bicycles	38
Depot Road	257 (Monday to Sunday 24 hours) Spaces for bicycles	5
Hook Road Multi-Storey	530 (Monday to Friday (6am to 11pm and Saturday 7am to 8pm)	4
Hope Lodge	68 (Monday to Sunday 24 hours)	3
Sir William Atkins House	177 (Saturday only 7am to 6.30pm)	0
Town Hall (rear)	85 (Monday to Sunday 24 hours)	9

Town Hall (front)	8 (Monday to Sunday 24 hours)	2
Upper High Street	181 (Monday to Sunday 24 hours) 2 bays for motorbikes	5
Bourne Hall	101 (Monday to Sunday 24 hours) Free on Sundays and Bank Holidays Spaces for motorbikes and bicycles	5
Dorset House	68 (Monday to Sunday 24 hours) Free on Sundays and Bank Holidays Spaces for motorbikes and bicycles	3
High Street (Ewell)	46 (Monday to Sunday 24 hours) Free on Sundays and Bank Holidays	2
West Hill	12 (Monday to Sunday 24 hours) Free on Sundays and Bank Holidays	2

Gaps in provision:

None identified.

Planned Provision:

None identified.

Impact of Potential Development Proposals:

With National Planning Policy requiring local authorities to optimise the use of sites, this could result in a reduction in private parking provision within development sites, particularly within sustainable locations such as the Town Centre. This could potentially result in increased demand for public off-street parking provision.

Electric Vehicle Charging Points

Lead Agency:

Surrey County Council
Epsom & Ewell Borough Council

Evidence Base:

Draft Surrey County Council Electric Vehicle Strategy (2018)

Strategic context:

The UK Government has set a target to ban the sales of new petrol and diesel cars by 2032. Ownership of electric vehicles (EVs) has grown significantly in recent years and is expected to grow exponentially moving forwards as technology and affordability improves, meaning that more people can choose to run electric cars. Growth in electric vehicles will reduce tailpipe emissions and is therefore essential in improving air quality on the roads and reducing the harmful effects of nitrous oxides on public health.

Research has predicted the potential in Surrey for the uptake of EV technology. Based on factors including local demographics, Surrey was considered to have a high propensity for EV uptake amongst its population compared to the national average.

Evidence indicates that most plug-in vehicle owners will wish to do the largest proportion of their charging at home. However, this requires dedicated off-street parking in the form of a garage or driveway. For many residents of the Borough this is not an option which presents a barrier to plug in vehicle adoption.

Both Surrey County Council and the Borough Council have a role to play in helping to fill gaps in the private sector led network to provide confidence to EV users and encourage the overall uptake of electric vehicles. How best this demand could be met requires further investigation. Surrey County Council are producing a draft electric Vehicle Strategy, and the Borough Council are investigating potential locations for EV charge points.

Existing provision

There are approximately 200 publicly available charge points across 58 sites in Surrey as of October 2017. The majority of sites are located in off-street locations such as supermarkets, rail stations, business parks and public car parks.

Gaps in provision:

Public charging point provision in the Borough is limited. This type of infrastructure needs to be increased to support the uptake of EV vehicles.

Planned Provision:

Under investigation. Scheme/s likely to evolve during the plan period.

Impact of development Proposals:

New homes should be planned with the capacity to support EV charging. An increased population could increase the uptake of EV vehicles.

Costs and Funding Sources:

The Office for Low Emission Vehicle (OLEV) On Street Residential Chargepoint Scheme offers funding for local authorities to buy and install electric car charge points. This could cover up to 75% of the cost of procuring and installing chargepoints. The grant is available on a first come first served basis.

Utilities and Physical Infrastructure

Water Supply and Sewerage

Lead Agency:

Thames Water (TW)
SES (formerly Sutton and East Surrey Water)

Evidence Base:

Thames Water response to Issues and Options Paper consultation
Thames Water response to IDP consultation (March 2018)

Strategic context:

TW: Thames Water is the statutory sewerage undertaker for Epsom & Ewell and is the statutory water undertaker for part of the Borough. Thames Water state that for all new development it will be critical that development is aligned with the water and wastewater infrastructure required to support it.

TW: The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Existing provision

No information.

Gaps in provision:

TW: Most of the Borough drains to the Hogsmill Sewage treatment Works and the potential increase in housing numbers is not of a concern as far as the capacity of the works is concerned. In relation to water, the Thames Water region is designated to be ‘seriously water stressed’ as such it is considered that policies within the new Local Plan should seek to maximise the water efficiency of new development.

Planned Provision:

TW: Water and wastewater treatment infrastructure upgrades will continue to be funded through water company business plans. Thames Water are currently working on their business plan for AMP7 which will cover the period from 1 April 2020 to the 31 March 2025. The business plan will be informed by details including local authority housing growth projections.

Impact of development Proposals:

TW: It is essential to ensure that adequate water and sewerage infrastructure is delivered prior to development taking place, in order to avoid unacceptable impacts on the environment, such as sewage flooding of residential and commercial property, pollution of land and watercourses, or water shortages with associated low pressure water supply problems.

TW: Water and sewerage undertakers have limited powers under the Water Industry Act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of occupation. Where necessary the use of appropriate planning conditions will be required to ensure that development is aligned with the delivery of any necessary infrastructure.

TW: In relation to specific sites depending on the type and scale of development that ultimately comes forward, there may be capacity issues in relation to the existing water supply network and waste water networks. It should not be underestimated how long it may take to deliver infrastructure. For example local network upgrades can take around 18 months to deliver, sewerage treatment and water treatment works upgrades can take 3 to 5 years to deliver. The requirement for and design of any network reinforcement works necessary will depend on more detailed information and may also be affected by other development proposals both within the Borough and elsewhere within the same water or wastewater catchments.

TW: In order to ensure that infrastructure delivery is aligned with development, Thames Water recommend that developers engage with them at the earliest opportunity to discuss their development proposals. Failure to do so could increase the risk of requiring planning conditions to ensure that development is aligned with any necessary water or wastewater network reinforcement works

Costs and Funding Sources:

TW: Network reinforcement infrastructure will be funded through the Infrastructure Charge which will be set each year. The requirement and design of network upgrades will be dependent on more detail on the location, scale and phasing of development. Water and wastewater treatment infrastructure upgrades will continue to be funded through water company business plans.

Implications for Local Plan & CIL:

Ensure Thames Water and SES are consulted as the Local Plan evolves. Engagement is particularly important in relation to site allocations and the timing of delivery.

Policy DM12 Housing Standards in the adopted Development Management Policies Document requires new housing development to comply with the higher water efficiency standards (Building Regulations Document G: Requirement G2 Water Efficiency).

This type of infrastructure is unlikely to require CIL funding at this stage.

Electricity

Lead Agency:

National Grid (NG)
UK Power Network

Evidence Base:

National Grid response to IDP consultation (March 2018)

Strategic context:

NG: National Grid owns and operates the national electricity transmission network across Great Britain, providing electricity supplies from generating stations to local distribution companies. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. National Grid may also undertake development works at its existing substations to meet changing patterns of generation and supply.

Existing provision

No information.

Gaps in provision:

None identified.

Planned Provision:

None identified.

Impact of development Proposals:

National Grid have no comments to make at this stage but wish to be involved as the plan develops.

Costs and Funding Sources:

Unknown.

Implications for Local Plan & CIL:

Ensure National Grid and UK Power Network are consulted as the Local Plan evolves.

This type of infrastructure is unlikely to require CIL funding at this stage.

Gas

Lead Agency:

National Grid (NG)
Scotia Gas Networks (SGN)

Evidence Base:

National Grid response to IDP consultation (March 2018)
Scotia Gas Networks (SGN) response to IDP consultation (March 2018)

Strategic context:

NG: National Grid owns and operates the high pressure gas transmission system. New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments.

SGN: SGN manages the network that distributes natural and green gas to homes and businesses. SGN's network within the Borough of Epsom & Ewell is predominately fed through one Transmission Regulator Station (TRS) from the Local Transmission System (LTS). Ashtead TRS feeds the borough from the South West, reducing pressure to the Intermediate (IP) and Medium (MP) pressure systems. In some instances pressure is reduced from IP to MP by means of District Pressure Governors (DPG). In turn, the IP MP systems are further broken down to local Low Pressure (LP) systems directly supplying the majority of existing domestic customers

Existing provision

See above.

Gaps in provision:

Currently no identified gaps in provision

Planned Provision:

None identified.

Impact of development Proposals:

NG: No comments to make at this stage but wish to be involved as the plan develops.

SGN: Comments on strategic development: As development has not been specified to exact areas of the Borough, potential demand has been spread out to try and simulate likely demand distribution and pressures. With demand spread out across the network, it is apparent that the network will need to be reinforced to accommodate the additional housing highlighted in the report.

North & North West

The northern section of the network (North and North-West of Longmead Business Park) is resilient to demand and can accommodate close to the full demand (6500 dwellings) of potential housing before reinforcement is required. Should the majority of development be planned for the northern parts of the borough then it is likely reinforcement will be required for the longer term development.

South

The Southern part of the network is sensitive to demand and will start to require reinforcement at around one third (2333 dwellings) of the potential demand. If large scale development should be scheduled for the southern parts of the borough then reinforcement will be needed in the short term to accommodate this.

SGN: Comments on Local Transmission System: Taking into account the highlighted potential demand, the LTS can accommodate this without the need to lay or upsize any pipes. However, if the full potential demand does go ahead then an upgrade of the heating system will be required.

SGN: General comments: Where required, SGN will look to manage the provision of any off site infrastructure improvements, in line with the overall development growth and / or timescales provided. The full extent of these works will be dependent on the nature and location of the requested load(s), potentially requiring LP reinforcement in addition to that required for the IPMP networks, and will only become clear once a developer's request has been received. Reinforcement solutions are likely to involve the provision of a new pipeline in parallel to SGN's existing mains system, but may also include the installation of above ground apparatus involving land purchase.

SGN: Request that, where the Council are in discussions with developers via the Local Plan, early notification requirements are highlighted. Additionally, SGN are aware of the advances being made in renewable technologies, especially those related to the production of biomethane. Should any developer be proposing to include such technology within their development, then we would highlight the benefits of locating these facilities near existing gas infrastructure. Again, where the Borough Council are in discussions with developers via the Local Plan, we would hope that these early notification requirements are highlighted

Costs and Funding Sources:

No comments.

Implications for Local Plan & CIL:

Ensure National Grid and SGN are consulted as the Local Plan evolves, particularly in relation to site allocations.

This type of infrastructure is unlikely to require CIL funding at this stage.

Flood Risk Management

Lead Agency:

Environment Agency
Surrey County Council
Epsom & Ewell Borough Council
Thames Water

Evidence Base:

Surface Water Management Plan (SWMP) (2011)
Strategic Flood Risk Assessment (SFRA) (2018)
Surrey County Council response to IDP consultation (April 2018)

Strategic context:

The majority of the Borough sits within the Hogsmill catchment. While the catchment has been heavily modified and the River Hogsmill itself has been heavily engineered, only a limited part of the Borough is categorised as being at high risk from fluvial flooding.

A greater threat is flooding from surface water / pluvial flooding. The areas at risk from fluvial flooding are identified in the SFRA, while those from pluvial / surface water are identified in the SWMP.

Existing provision

Two balancing ponds have been created near to the Stew Pond in association with the West Park development to address surface water runoff.

Gaps in provision:

Refer to annex.

Planned Provision:

A number of schemes have been identified through the Hogsmill Catchment Partnership (comprised of EEBC and the South East Rivers Trust), the Surrey Flood Risk Management Group and those schemes identified through the Surface Water Management Plan (SWMP). Further details are available in Annex 1

Impact of Potential Development Proposals:

Development proposals within areas identified as being at risk will either be discouraged or required to introduce appropriate levels of mitigation, which may include new flood prevention infrastructure such as SUDS.

Costs and Funding Sources:

Some funding has already been secured towards one of the schemes (the Chambermead Project – refer to Annex 1)

Implications for Local Plan & CIL:

There may be opportunities for CIL to contribute towards larger schemes in the future which help reduce the risk of flooding.

Waste Management and Disposal

Lead Agency:

Surrey County Council
Epsom & Ewell Borough Council

Evidence Base:

Joint Municipal Waste Management Strategy (2014)
Surrey Waste Local Plan (in preparation, due to be adopted in 2019)
Surrey County Council response to IDP consultation (May 2018)
EEBC Operational Services response to IDP consultation (April 2018)

Strategic context:

Epsom & Ewell Borough Council are responsible for the collection of household waste (the Waste Collection Authority), and also for the delivery of recycling and composting schemes based on the separation of suitable materials.

Surrey County Council is the Waste Disposal Authority, which involves arranging for the acceptance of municipal waste collected by the district councils and the provision of facilities for its subsequent treatment and disposal. The County also provides Community Recycling Centres (CRCs) for residents to deliver household waste.

There are 15 CRCs and four waste transfer stations in the County. One of the CRCs and a waste transfer station are located on the same site within the Borough.

The overarching aims of the Surrey Waste Plan is to reduce the level of waste being produced and to ensure that a high percentage of waste that is produced is reused or recycled and where this is not possible that there is sufficient infrastructure to process the waste that is produced effectively.

Some waste could be affected by population changes, other than simply increasing the tonnages available for collection. For example, higher birth rates may affect the quantities of nappy waste.

Existing provision

- Community Recycling Centre and waste transfer station on the Longmead industrial estate
- The Chalk Pit, College Road, Epsom. Waste related businesses – a combination of waste transfer and materials recovery services
- Mid-Surrey Farm, 133 Reigate Road, Ewell – operational waste site engaged in the biological treatment of waste and soil recycling.
- The Borough Council has a fleet of 13 refuse and recycling vehicles.

Gaps in provision:

Modifications have been made to the layout of the Community Recycling Centre to improve its capacity.

Growth in the number of households is placing pressure on the Borough Council's existing fleet of refuse and recycling vehicles.

Planned Provision:

None identified.

Impact of development Proposals:

Community Recycling Centre (CRC)

There has been a significant reduction in total waste brought to Community Recycling Centres across Surrey in the past two years. It has reduced from a total of 140,000 tonnes per year across all 15 CRCs in 2015/16 to around 100,000 tonnes in 2017/18. Therefore it is unlikely that further capacity will be required for some years.

Waste Transfer Station

The opening of an additional transfer station at Earlswood in 2015 has reduced the pressure on Epsom waste transfer station and therefore it is unlikely that further capacity is required for the time being. Additionally the introduction of producer responsibility schemes such as returnable plastic bottles is likely to reduce the amount of waste collected by local authorities, although the impact of this may be minimal.

Refuse collection vehicles

Housing growth over the past few years has placed significant pressure on the existing fleet of refuse and recycling vehicles. Additional development is highly likely to require additional infrastructure in the form of new refuse and recycling vehicle(s).

Costs and Funding Sources:

Unidentified at this stage.

Implications for Local Plan & CIL:

CIL funding could be required to fund new waste infrastructure in the form of new refuse and recycling vehicle(s).

Social and Community Infrastructure

Early Years

Lead Agency:

Surrey County Council

Evidence Base:

Surrey Infrastructure Capacity Study (2017 update)

Surrey County Council are preparing primary evidence that will serve as a response. This will be used to inform a subsequent version of the IDP.

Strategic context:

Early years childcare provision comprises independent nurseries, school nurseries, crèches, after school clubs, playgroups, holiday and weekend schemes and individual childminders. The Childcare Act 2006 places a duty on all local authorities in England to ensure there is enough childcare services for parents that want them.

Many of the Early Years services are provided independently, however Surrey County Council retains a responsibility to audit the statutory standards for learning, development and care from birth to five that all early year providers must meet.

The population forecasts, which informed the Surrey Infrastructure Capacity Study, show a decline in early years age children to 2031. This makes it difficult to forecast future requirements for facilities.

Surrey County Council has the responsibility for providing 15 hours of Free Early Education Entitlement (FEEE) for vulnerable 2 year olds, all 3 and 4 year olds and identifying gaps in Early Years and Childcare provision. From September 2017 SCC have been required to provide 30 hours of childcare for children of working families. This requirement has increased funding requirements for SCC.

Existing provision

Information from the Surrey Infrastructure Capacity Study identifies that the Borough has the following provision:

Nursery / School Nursery / Crèche		School Club / Playgroups		Holiday / Weekend / Other	
<i>Number of Facilities</i>	<i>Total Capacity</i>	<i>Number of Facilities</i>	<i>Total Capacity</i>	<i>Number of Facilities</i>	<i>Total Capacity</i>
28	1,579	41	1,594	14	596

Impact of Potential Development Proposals:

It is acknowledged that major developments will produce increased demand locally, which will need to be addressed.

Primary and Secondary Education

Lead Agency:

Surrey County Council

Evidence Base:

School Organisation Plan 2018 to 2027

Surrey County Council response to IDP consultation (May 2018)

Strategic context:

Surrey County Council has a statutory duty to ensure there are sufficient school places in the County to meet the present and future demand for school places.

The School Organisation Plan sets out, over a ten year period, where the LEA thinks there will be a need to adjust the provision of school places in future.

Births in Epsom & Ewell

Data provided by the Office for National Statistics shows that births in Epsom & Ewell reached a low point in 2001 before increasing steadily to 2007. Since then, the birth rate has fluctuated, with dips in 2009 and 2013, against a general upward trend. The Borough reached a current peak in births in 2015.

It should be noted that there are a number of private independent schools in the Borough which will absorb some of the demand from population growth. It is also recognised that there is substantial cross border activity in this area which can reduce or create pressure on the number of school places needed. For example, schools located in the north of the borough have a significant intake of 'out of county' pupils.

Existing provision

Primary school provision:

There are 19 primary phase schools in the Borough, 7 of which have nursery provision. Epsom and Ewell is made up of 4 individual primary planning areas.

There have been a number of permanent and bulge expansions of primary phase provision in recent years, in order to accommodate growing intakes, and the primary estate is currently running at close to full capacity. In the 2017 admissions round, offers were made to 1,118 pupils, relative to a total capacity of 1,120, leaving a surplus of 0.2%.

Secondary school provision:

There are 4 secondary academies that fall under the aegis of Surrey County Council; acting as local education authority. These are operated by the Bourne Education Trust, the Blenheim Academy and the GLF Schools. All of these schools provide post-16 provision.

There have been no recent actions taken to provide additional secondary places, as there has historically been a small amount of surplus capacity within the system. As the larger primary cohorts transition to secondary, there is likely going to be the need for additional provision in the Borough and the form that this will take is currently the subject of discussion between SCC and the schools concerned.

In addition to the 4 “Surrey” secondary academies, the Borough is also home to the Nonsuch High School for Girls. Whilst this secondary academy falls under the aegis of the neighbouring local education authority (the London Borough of Sutton), it nevertheless meets and supports need generated within the Borough.

Gaps in provision:

Primary school provision:

On the basis of known and forecast birth rates, coupled with projected housing completions, the number of children entering primary education is set to continue to increase over the next 10 years.

The table below gives the forecast numbers¹ of pupils that will require a Reception place in a primary school in Epsom & Ewell from 2018 to 2027. This estimation is compared with the total number of available places in Epsom & Ewell now (the sum of all primary schools’ Published Admission Numbers).

Year	PAN	YR Projection	Projected Surplus
2018/19	1,020	1,007	13
2019/20	1,020	1,032	- 12
2020/21	1,020	1,024	- 4
2021/22	1,020	1,052	- 32
2022/23	1,020	1,057	- 37
2023/24	1,020	1,069	- 49
2024/25	1,020	1,080	- 60
2025/26	1,020	1,087	- 67
2026/27	1,020	1,092	- 72

Primary place planning is determined by forecasting within smaller localities within the borough: Stoneleigh & Worcester Park, Ewell, North West Epsom and South Epsom & Langley Vale comprise the four primary planning areas. There is likely to be some pressure for primary places in all areas, with the final mix of expansions / new provision highly contingent upon where new housing is located (since this is the principal driver of pupil growth).

¹ It should be noted that the above forecasts are based on housing trajectories provided by Epsom & Ewell in 2017.

Secondary school provision:

SCC plans on a borough basis for secondary places and demand for secondary places generally follows primary demand. Forecasts for the future need for secondary places are based on taking the historic transfer ratio from Year 6 to Year 7 in the borough, and applying this to our estimated numbers for future Year 6 cohorts. The table below gives the forecast numbers² of pupils that will require a Year 7 place in a primary school in Epsom & Ewell from 2018 to 2028.

Year	PAN	Y7 Projection	Spare Year 7 places
2018/19	960	943	17
2019/20	960	1,002	- 42
2020/21	960	989	- 29
2021/22	960	1,077	- 117
2022/23	960	1,101	- 141
2023/24	960	1,136	- 176
2024/25	960	1,152	- 192
2025/26	960	1,104	- 144
2026/27	960	1,117	- 157
2027/28	960	1,109	- 149

Planned Provision:

There are no current planned increases in primary or secondary provision. On the basis of the current forecasts, it is anticipated that any capacity deficits will be manageable via the provision of bulge classes, until the more significant jump in demand in 2021/22. Discussions with schools regarding how best to manage future place requirements are ongoing and will be heavily influenced by the plans for new housing development, as these become clearer.

² It should be noted that the above forecasts are based on housing trajectories provided by Epsom & Ewell in 2017.

Impact of development Proposals:

As shown above, there is little latent school capacity in Epsom & Ewell. There is the need for between and additional three and five primary forms of entry, together with between five and eight secondary forms of entry. This is largely driven by the proposed new housing development, although the larger uplift in the secondary sector is also (in part) attributable to historic increases in birth rate.

Costs and Funding Sources:

As the current school estate is at capacity, with limited opportunities for expansion, the cost model for meeting pupil place requirements in Epsom & Ewell is based on the delivery of new provision. It may be possible to reduce these costs, through judicious use of expansions, although it is not possible to gauge the likelihood of this possibility without having a clear understanding of the housing proposals for the Borough, over the course of the IDP. The cost model is summarised in the below table and is based on the higher forecast rates (i.e. those pertaining to the NPFF):

School Type	BB103 Area (m ²)	Cost per m ² (£)	Total Cost (£)
2FE Primary	2,290	2,597	5,947,130
3FE Primary	3,235	2,597	8,401,295
8FE Secondary	9,790	2,597	25,424,630
Total	15,315	N/A	39,773,055

Implications for Local Plan & CIL:

As the Local Plan progresses and sites are identified the need for additional school places / new schools will be clarified.

Post 16 Education

Lead Agency:

Surrey County Council
University for the Creative Arts
NESCOT
School Sixth Forms
Education and Skill Funding Agency (source of funding only)

Evidence Base:

DRAFT Demographics Study 2017 (Surrey County Council)
Surrey Infrastructure Capacity Study (2017 update)
Post-16: Travel to Success (Surrey County Council)
Surrey County Council response to IDP consultation (May 2018)

Strategic context:

Under the Raising the Participation Age legislation, all young people have a duty to continue in education or training until their 18th birthday. They have the choice of remaining in full time education; undertaking an apprenticeship, traineeship or supported internship; if they are employed or volunteering (for 20 hour or more per week), enrolling in accredited part time education or training. Young people will also be considered to be meeting the duty where they are participating in approved activities designed to enable them to progress to one of the options listed above.

According to the last national statistical release, for 2016, the proportion of 16 and 17 year olds described as 'Not in Education, Employment, or Training' (NEET) within Surrey was 1.5% compared to 2.8% nationally. Participation levels, as at June 2017, were 94% for 16 year olds and 90% for 17 year olds.

The total number of 16 to 18 year olds in Surrey is projected to remain static between 2018 and 2019, after which there is steady growth. Overall, there is projected to be growth of 7,600 to 2026, which represents just under 19% of the 2018 cohort.

Existing provision

The further education market within the Borough consists of four state funded school sixth forms (Blenheim High School, Epsom & Ewell High School, Glyn Technology School, Rosebery School), one special school sixth form (Linden Bridge School), one general further education college (NESCOT). As well as full-time further education NESCOT also offer higher education and deliver training for a range of apprenticeships. Nonsuch high School for Girls, which falls under the neighbouring local education authority, also provides sixth form provision.

The University for the Creative Arts (UCA) has a campus in Epsom offering some further education opportunities as well as higher education. Epsom College, an independent school providing education up to the age of 18 is

also available along with Laine Theatre Arts offering courses in the performing arts.

Gaps in provision:

Although the total rise in the number of 16-18 year old in the Borough is predicted to be 600, an increasing proportion of young people are choosing to continue their learning in the workplace, thus reducing the demand on physical sites dedicated to teaching and learning. As a result, most further education providers in Surrey have experienced reduced funding contracts, but have spare capacity and potential growth.

Given the above information it is likely that existing provision will accommodate any population growth between 2018 and 2026.

Planned Provision:

None identified

Impact of development Proposals:

None identified yet.

Costs and Funding Sources:

N/A

Implications for Local Plan & CIL:

This type of infrastructure is unlikely to require CIL funding at this stage.

Health

The Health and Social Care Act 2012 changed the way that primary care services are planned and organised. From April 2013 PCTs were replaced by GP-led organisations called Clinical Commissioning Groups (CCGs). CCGs now commission most of the hospital and community NHS services in the local areas for which they are responsible. Commissioning involves deciding what services a population is likely to need, and ensuring there is provision of these services. The CCGs are overseen by NHS England. In March 2016 NHS England further reorganised into 44 Sustainability and Transformation Plan (STP) areas. These were agreed by NHS Trusts, local authorities and CCGs. There are 44 of these areas covering all of England.

NHS health care resources are funded from central government and fall into three categories, public health, primary health care and secondary health care.

Public health focuses on increased well-being and reducing avoidable illness, injuries, distress and death. The objective is to keep people well to ensure there are fewer requirements for health care services. Public health is undertaken as part of a partnership approach between local government, health providers and commissioners, the police and local voluntary and community groups. This work is important to reduce the burden on existing infrastructure from preventable health issues.

Primary Health Care includes front line services – GPs, dentists, opticians, midwifery and community health visitors. Future needs in relation to public health and primary health care are identified through the Joint Strategic Needs Assessment (JSNA) and Joint Health and Wellbeing Strategies undertaken in partnership by the County Council and the CCGs covering Surrey. These inform commissioning decisions across local services to ensure they are focussed on the needs of service users and communities.

Secondary Health Care comprises acute services (elective and emergency) such as specialist medical care, referrals from GPs, secondary mental health care and ambulance services. The majority of secondary healthcare in the Borough is delivered by the Epsom and St Helier Hospital Trust, which has a wide catchment. Services provided by the hospital are generally commissioned by the CCG.

General Practice (GP) and Community Health Infrastructure

Lead Agency:

Surrey Heartlands Sustainability and Transformation (STP) area

Evidence Base:

Consultation response from Head of Estates Surrey Heartlands Clinical Commissioning Groups
 Surrey Infrastructure Capacity Study (2017 update)

Strategic context:

Epsom & Ewell is contained within the Surrey Heartlands STP area. Surrey Heartlands CCGs have a responsibility for Estate development and planning for community and primary care since April 2017.

Future development in healthcare will aim to consolidate and expand existing sites or replace existing sites with new larger facilities on either NHS owned property or within large development sites. Consolidation will also result in efficient use of land for health care and may reduce the land requirements of the health service.

Existing provision

The Borough currently has 1 Community Hospital at West Park, 2 health centres and 10 GP practices, including branch surgeries.

The Surrey Infrastructure Capacity Study (2017 update) identifies the Borough as having the following provision:

Existing Primary Care Provision 2017			
<i>Number of FTE GP</i>	<i>Patient List Size</i>	<i>Patients per GP</i>	<i>Population per dental practice</i>
43	85,877	1,982	3,300

Source: Primary healthcare capacity and patient list size according to HSCIC 2016 data. Pharmacy and Dental data from HSCIC 2016 data. UK benchmark for GP provision is 1,800 patients to 1 GP, 165sqm per GP provision. UK benchmark for dental provision is 0.57 dentists per 1,000 people, 50sqm per dentist.

Gaps in provision:

None identified yet.

Planned Provision:

None identified yet.

Impact of Potential Development Proposals:

The scale of the Borough's likely future housing requirement suggests a need for at least 9.9 new Full Time Equivalent GPs by 2032. This would, over 20 years, create increased demand of circa 0.5 new FTE GP positions per annum to meet housing growth across existing sites or new consolidated sites.

The Surrey Infrastructure Capacity Study (2017 update) has identified a need for 8 additional dentists. This is based on the application of benchmark standards.

Much of the current healthcare estate is insufficient to meet future needs and Surrey Heartlands propose that EEBC supports the development of the healthcare estate, including the needs of GPs, to meet developing requirements by:

- Mitigating the impact of development on Primary care and Community Health Services by funding healthcare capacity increases through CIL or Section 106 agreements where new facilities of suitable scale can be developed.
- Base the impact assessment of growth and funding on the Surrey County Council Infrastructure Study (2016) that specifies infrastructure requirements and costs associated with new infrastructure such as 1 GP Full Time Equivalent per 1800 new residents.
- Assessments of costs should be index linked to cover the length of the Local Plan
- Enabling new healthcare capacity to be developed in new locations when appropriate, by expansion of existing facilities wherever possible and the closure of existing facilities that are unable to deliver sustainable services in the future.

Costs and Funding Sources:

None identified

Implications for Local Plan & CIL:

This type of infrastructure would be likely to require CIL funding during the plan period.

Adult Social Care

Lead Agency:

Surrey County Council Health and Social Care

Evidence Base:

Surrey County Council Accommodation with Care & Support Strategy
Surrey County Council Health and Social Care response to Local Plan Issues and Options Paper
Surrey Infrastructure Capacity Study (2017 update)

Strategic context:

From 1 April 2009 all health and social care services in England are registered and regulated by the care Quality Commission (CQC), whether provided by the NHS, local authorities, private companies or voluntary organisations.

Residential and nursing homes are provided for by a mixture of these public and private organisations. Adult Social Care client groups include: people with learning disabilities, people with mental health needs, people with physical disabilities, and older people (over 65 years).

Surrey County Council's Strategic intent is to shift from traditional residential and nursing care to jointly commissioned, innovative accommodation with care and support.

Existing provision

The Surrey Infrastructure Capacity Study (2017 update) has identified the following provision in the Borough and future theoretical need:

Nursing				Residential			
<i>Beds</i>	<i>SCC Funded Beds</i>	<i>Beds/1,000 over 75</i>	<i>Beds needed by 2025</i>	<i>Beds</i>	<i>SCC Funded Beds</i>	<i>Beds/1,000 over 75</i>	<i>Beds needed by 2025</i>
184	23	28	69	194	74	30	63

Gaps in provision:

See the need identified above.

The Accommodation with Care & Support (Aw C&S) strategy for older people was looking towards the development of 120 affordable Extra Care Housing flats across key areas within Surrey Downs. However, it is likely that this number will increase.

The Aw C&S strategy for people with mental health problems has also noted the increasing number of people who may need a range of types of supported accommodation, and the current lack of flexibility and responsiveness when people want to move into less supportive settings locally.

The direction of travel for people with learning disabilities is also towards supported living models rather than residential care homes.

Planned Provision:

N/A

Impact of Potential Development Proposals:

The Surrey CC Health and Social Care team have made the following comments:

As a generality, housing should be situated near facilities and infrastructure such as buses and shops.

Housing should be built to be more flexible and meet the needs of the same individual / household through life stages, rather than providing “for families” or “for older people”. Thus, properties could be designed and built for the needs of “cradle to grave”. For example, accessible to people with young families and for people as they age. This could take the form of accommodation with ground floor bathrooms, wide doorways, step-free front and interior doors etc. This would potentially save money currently spent on adaptations to help people as they develop disabilities, or to avoid people needing to relocate to more accessible properties.

At the same time, it would be helpful if the current generation of older people who own large houses were able and supported to downsize easily within their existing community.

Please also consider provision of key worker housing – including ASC staff both public and private

Costs and Funding Sources:

N/A

Implications for Local Plan & CIL:

Consider the housing needs for Adult Social Care against more general housing needs.

Sports Facilities (indoor and outdoor)

Lead Agency:

Epsom & Ewell Borough Council

Evidence Base:

Audit of Open Space, Sport and Recreation Facilities and Assessment of Local Needs (March 2006)

Surrey Infrastructure Capacity Study (2017 update)

EEBC Leisure Developments Strategy 2016 to 2020

Strategic context:

Outdoor sports facilities include natural or artificial surfaces either publicly or privately owned which are used for sport and recreation. Examples include playing pitches, athletics tracks, bowling greens and golf courses. Indoor sports facilities include the main leisure centres, which provide facilities such as sports halls, swimming pools and health and fitness studios. There are also a number of private sports facilities in the Borough which help meet local needs. These include various health clubs (e.g. PureGym and David Lloyd) and golf clubs (e.g. RAC Club, Epsom Downs).

In addition to these there are a number of facilities located in close proximity immediately beyond the Borough's boundaries which will help to meet some of the Epsom & Ewell resident's needs.

Existing provision

The Borough has one local authority owned leisure centre; the Rainbow Centre. It has relatively new facilities and provides a Borough wide service. In relation to outdoor sports facilities, the Borough currently has 98 playing pitches (including mini-soccer, cricket, junior and adult football, hockey and rugby). This includes 21 school sites.

The Surrey Infrastructure Capacity Study (2017 update) identifies the following as being provided within the Borough:

Indoor Community and Leisure Provision

Community Centres	Sports Hall Courts	Swimming Pool Lanes	Squash Courts	Gym Stations	Indoor Bowls Rinks	Indoor Tennis Courts
2	55	34	16	701	1	2

Outdoor Sports and Recreation Provision

Grass Pitches	Artificial grass Pitch	Tennis Courts	Athletic Tracks Lanes	Golf Clubs
149	9	48	6	3

Tables do not differentiate between public and private access.

The Epsom & Ewell Open Space Audit sets a standard for outdoor sports facilities of 3 ha per 1,000 population (excluding golf courses and the race course)

Gaps in provision:

There is a good distribution of outdoor sports facilities, although there appears to be excess demand placed on sports pitches. In qualitative terms survey data has suggested there is a lack of tennis, basketball, cricket and rugby facilities.

The Audit has identified a number of maintenance and capital works to improve existing open spaces to address the identified deficiencies.

The Audit recommends that the Council seeks to; increase the provision of outdoor sports pitches (especially mini soccer) through more grass pitches or development of synthetic turf pitches; provide additional Multi Use Games Areas (MUGAs), increase indoor tennis and bowls provision.

Planned Provision:

As sites are identified through the Local Plan process, schemes for new or improved sports facilities may emerge.

Impact of Potential Development Proposals:

While the Borough is well provided for in terms of the quantity of open space, new additional development is likely to increase the use of these areas / facilities. Qualitative improvements and new facilities may be required to meet this demand and maintain standards of provision.

Costs and Funding Sources:

N/A

Implications for Local Plan & CIL:

It is likely that any larger sites allocated as part of the Local Plan will, where appropriate and practical, include on-site open space provision.

Community Centres

Lead Agency:

Epsom & Ewell Borough Council

Evidence Base:

Community and Wellbeing Centre website
(communityandwellbeingcentreepsom.org)

Strategic context:

Existing provision

The Community and Wellbeing Centre is managed by Epsom & Ewell Borough Council, and offers a range of social and recreational events for people aged 55+. During the evenings and weekends the centre's rooms are available to hire.

The aim of the Wellbeing Centre is to support the Borough's growing elderly population and vulnerable adults with their physical, emotional and mental health wellbeing. The Centre also specialises in supporting people with memory loss, confusion and the early stages of dementia.

Gaps in provision:

With an aging population there is potential for the Centre's services to be in greater demand in the future.

Planned Provision:

Demand for services is high and there is a potential opportunity to enhance/expand the centre in association with the facilities at the neighbouring Rosebery Housing Association owned Norman Collier Court. This opportunity may be considered in more detail in the future.

Impact of Potential Development Proposals:

Additional development is likely to result in additional demand for the Centre's services.

Costs and Funding Sources:

None yet identified.

Implications for Local Plan & CIL:

None yet identified.

Cemetery Provision

Lead Agency:

Epsom & Ewell Borough Council

Evidence Base:

N/A

Strategic context:

Epsom Cemetery is owned and managed by Epsom & Ewell Borough Council. It is located off of Down's Road and Ashley Road, in close proximity to Epsom Downs

Existing provision

There is currently only one active Borough Council managed and maintained cemetery, Epsom Cemetery.

Gaps in provision:

The current lawn section was opened in 2010 and is now almost at full capacity. At the current rate of lawn burial it is anticipated this section will be full by the summer of 2018. Whilst the Cemetery Team continue to manage the older sections of the Cemetery, creating new graves where trees/hedges/old pathways have been removed, an extension into the adjacent field will be necessary to maintain the Cemetery Service and provide burial for the local community for the next 20 to 25 years.

Planned Provision:

The Borough Council is in the process of securing a parcel of land, covering an area of about 1.5 ha, adjacent to the existing Epsom Cemetery for the purpose of expanding provision.

Impact of development Proposals:

N/A

Costs and Funding Sources:

N/A

Implications for Local Plan & CIL:

The extension to the cemetery requires the deployment of CIL funds.

Community Safety

Lead Agency:

Epsom & Ewell Borough Council

Strategic context:

The Borough is regarded as one of the safest places in Surrey to live, work and study. Anti-social behaviour and crime (that occasionally happens locally and from outside of the Borough) that impacts its community is dealt with by a multi-agency approach. The Borough has an established network of CCTV cameras.

The CCTV in Epsom, Ewell and Stoneleigh fulfils 4 principal functions, as follows:

a) Deterrence

The benefit of CCTV as a crime prevention tool is achieved via the criminal's perception that they will be identified, caught and prosecuted. Awareness is raised through the signs distributed across the monitored areas.

b) Reassurance

CCTV provides some general reassurance by making members of the public feel that they are in a "safer" area than would otherwise be the case. Over time residents and visitors will have become used to the presence of CCTV and would probably adversely react to its removal.

c) Response

There is a real-time operational benefit from CCTV given its use in the monitoring of crowds or traffic at key locations during incidents and/or events. This includes Epsom Town Centre during the Derby race meeting and also following the late night closing of the clubs in Epsom.

d) Detection

Surrey Police can cite a number of examples where CCTV footage has been used to evidence offending behaviour and as a tool for enforcement within the Borough. For example within the last three months CCTV images have been used to detect numerous criminal damage offences committed by a group intent on mass graffiti tagging.

Existing provision

Within the Borough there are 20 cameras which are owned and maintained by the Council. Of these, 16 are within Epsom Town Centre, 2 in Ewell Village local centre and 2 within Stoneleigh local centre. Monitoring of the cameras is undertaken by the Surrey Police. The camera technology dates from the 1990s and the units are increasingly requiring significant maintenance.

Gaps in provision:

No identified gaps in provision although due to the age of the infrastructure, periodic upgrading will be required.

Implications for Local Plan & CIL:

The upgrading of the CCTV units could require the use of CIL funds

Emergency Services

Police

Lead Agency:

Surrey Police

Evidence Base:

Surrey Police response to IDP consultation (June 2018)

Strategic context:

Policing is a population based service and therefore the Borough's fast growing population due to additional housing would inevitably place significant additional demands on existing police services.

Surrey Police have a duty to respond to all incidents. They deliver crime prevention, attend and provide a service lead at emergencies for example RTAs or flooding, counter terrorism and community reassurance. They attend all incidents involving deaths, attend crowd and events policing, attend and input into community safety and crime partnerships and provide referral responses when there are expressed concerns about the safety of children, the elderly or those with special needs.

Existing provision

The NSIR Hierarchy report for April 16 to March 17 recorded 11,572 incidents within the Epsom and Ewell administrative area. There has been a notable rise in recorded crimes from 4,157 crimes (April 2015 to March 2016) which has now risen to 4,711 crimes (April 2017 to March 2018).

At present 31,930 households generate an annual total of 11,572 incidents per year that require a police action in Epsom & Ewell over the last year. These are not necessarily all 'crimes' but are calls to the contact centre which all require a police response / action. Taking into account the number of recorded incidents and current population this results in 0.36 incidents per household.

Gaps in provision:

N/A

Planned Provision:

N/A

Impact of Potential Development Proposals:

Where additional development is proposed the police service will seek to deploy additional staffing and infrastructure at the same level that is required to deliver services to the locality. Without additional support, unacceptable pressure will be put on existing staff and capital infrastructure, which will seriously undermine their ability to meet the needs of the Borough and Surrey as a whole. The impacts of the proposed quantum of development in the

Borough is so significant that they cannot be met without additional staff deployed at a level consistent with the current policing of Epsom and Ewell.

The ratio of households to officers in Epsom and Ewell is 260:1 and the number of households to staff is 431:1. The number of additional officers and staff required to meet the growth outline for Epsom and Ewell is 27 officers and a minimum of 16 staff members.

Whilst national and local funding must continue to cover salary and maintenance costs, there would be insufficient funding to provide the infrastructure required for officers to carry out their jobs effectively. This includes things such as equipping staff, increasing the vehicle fleet capacity, additional capacity for staff and officer workspaces and ANPR cameras. Refer to table in Annex 1 for details of infrastructure requirements.

Costs and Funding Sources:

Like many other public sector organisations, Surrey Police have seen a real terms reduction in grant funding in recent years, which has necessitated changes to the policing model. At the same time the demands placed on the police service increase. It remains necessary to secure contributions for policing infrastructure, due to the direct link between the demand for policing services and the changes in the operational environment beyond Surrey Police's control i.e. housing growth

Implications for Local Plan & CIL:

This type of infrastructure is likely to require CIL funding in the future to ensure acceptable standards of provision are maintained.

Fire & Rescue

Lead Agency:

Surrey Fire and Rescue Service (SFRS)

Evidence Base:

SFRS response to IDP consultation (June 2018)

Strategic context:

During 2009/10 there were 181 fires within the Borough with 118 being accidental and 63 being deliberate. The figures from 17/18 show a reduction of approximately 30% (123 fires) in the number of fires compared to the reporting year of 09/10 (181 fires). Of the 123 fires; 44 were deliberate which strongly demonstrates that all the key prevention work that the fire service do in educating people has reduced the number of accidental fires.

There is now a requirement under the Collaboration Agenda to work closer with other agencies and partners to explore options for making efficiencies and streamlining services. Good practice has been demonstrated through the building of combined new stations for both Fire and Ambulance services (even a tri service hub in some locations in the UK). This model could be explored for Epsom as the Epsom Ambulance Station is an aging site built in the 1950s and is in need of a more modern replacement.

Existing provision

Epsom Fire Station has been in place since 1937 and it is well known that there is a need to provide a more modern Fire Station Improved facilities, especially training facilities are needed for its crew as the scope of the fire service widens (road traffic collision rescue, emergency medical response, effecting entry on behalf of Surrey Police and to assist the Ambulance service to free up vital police time). A newer Fire Station will be much more community focused which will be of benefit to the various seasonal community safety campaigns.

Since the last IDP, Epsom Fire Station has been reduced from two pumps to one, the other being stationed in a temporary Fire Station in Banstead since November 2014.

Gaps in provision:

Despite the accepted need for a new fire station development there are still no firm plans in place to replace Epsom Fire Station as of May 2018.

Planned Provision:

None yet although there is an identified need.

Impact of development Proposals:

Fire service infrastructure requirements used to be based on Home Office formula which defined how many pumping appliances a Fire Station had to have. This was dependent on population and the type of buildings on the station ground although the formula related to responses to fires only. However, the 2004 Fire and Rescue Services Act placed new statutory duties and responsibilities on the Fire and Rescue (as discussed above). With this came the ability to set their own response standards based on a tailored risk assessment called an Integrated Risk Management Plan. Services are located and provided in a way that best manages risk, which has led to changes in the way the service has allocated funding and the location of infrastructure across the country. There is also greater attention paid to reducing the incidence of fire and accidents rather than the reactive fire and rescue services.

It may be more favourable to have two stations with one pump each serving an area for a quicker response to incidents rather than have two Fire Engines in one station mobilised to the same call.

Costs and Funding Sources:

Unknown

Implications for Local Plan & CIL:

The need for a new Fire Stations, potentially co-located with the Ambulance Station needs to be considered as part of the Local Plan review.

Ambulance

Lead Agency:

South East Coast Ambulance Service

Strategic context:

Ambulance services are run by the South East Coast Ambulance Service NHS foundation trust.

Demand continues to increase for the ambulance service and the spectrum of patient need is constantly broadening.

The ambulance service are moving to a new operational model – a fleet hub model. This involves a series of centralised garages from which fleet vehicles are resupplied, serviced, stored and maintained. The vehicles travel out from these hubs and effectively operate remotely from hospitals, lay-bys or other appropriate locations.

Existing provision

Epsom Ambulance Station, Church Street, Epsom, KT17 4PW

Due to changes to the ambulance service's operational model, the existing station could be declared surplus in the future.

Implications for Local Plan & CIL:

The release of the ambulance station onto the development market could contribute towards the delivery of the 'fleet hub' model. The site has been allocated in the Council's Plan E (Area Action Plan for Epsom Town Centre) for residential development.

Green Infrastructure

Open Spaces (parks & gardens / children's & young persons / amenity green space, Local Nature Reserves and Epsom Common)

Lead Agency:

Epsom & Ewell Borough Council

Evidence Base:

Audit of Open Space, Sport and Recreation Facilities and Assessment of Local Needs (March 2006)

Horton Country Park Local Nature Reserve Management Plan (2017 to 2117)

Epsom Common Management Plan (2016 to 2116)

Hogsmill Local Nature reserve Management Plan (2017 to 2117)

Strategic context:

An Open Space Audit was conducted in 2006 which provided a set of local quantity, quality and accessibility standards for a variety of types of open space. The open space typologies, quantity and accessibility standards are set out below:

Parks & gardens: Epsom and Ewell quantity standard – 0.35ha per 1000 population, Accessibility standard – 14 minute walk (1.2km)

Natural & semi-natural open space: Quantity standard – 11ha per 1000 population, Accessibility standard – 15 to 19 minute walk (1.6km)

Amenity green space: Quantity standard – 2ha per 1000 population, Accessibility standard – 5 to 9 minute walk (0.4km)

Provision for children & young people: Quantity standard – 0.35 ha per 1000 population, Accessibility standard – 10 to 14 minute walk (1.2km),

Sports facilities: Outdoor sports facilities: Quantity standard – 3ha per 1000 population, Accessibility standard – 15 to 19 minute drive (8km)

Allotments & community gardens: Quantity standard – 0.16ha per 1000 population, Accessibility standard – 20 to 24 minute drive (10km)

Cemeteries & churchyards and green corridors: No local standards set.

There are also qualitative standards for each typology which are set out within the open space audit.

It is also recognised that the Borough's Green Infrastructure provides a very important reservoir for biodiversity. The Council is in the process of identifying potential improvements to areas of green infrastructure which will provide a strategic open space / biodiversity enhancement function.

Existing provision

In quantitative terms the Borough is generally well provided for in terms of open space, although there are pockets of deficiency for a number of open space types.

In qualitative terms the Open Space Audit recommended a number of improvements which will help ensure local qualitative standards are met. Borough Officers have identified a number of improvements to the Borough's open spaces which will help maintain and improve their capacity.

Gaps in provision:

A number of quantitative deficiencies for some of the open space typologies were identified across the Borough. Deficiencies were identified for children & young people, amenity green space, parks & gardens and natural & semi natural greenspace. These are discussed in detail in the Open Space Audit.

Numerous improvements to existing open spaces have been identified which will help to ensure the qualitative standards are met and will help increase capacity.

In addition a number of improvements could be made to the Borough's green infrastructure to enhance its biodiversity / strategic open space function.

There are waiting lists for allotments within the Borough, which may indicate that further provision is required.

Planned Provision:

It is likely that qualitative improvements to the Borough's open spaces will be identified over the plan period.

Impact of Potential Development Proposals:

New developments and population growth will increase the intensity of use of existing open spaces and may require the provision of new facilities.

Costs and Funding Sources:

Unknown

Implications for Local Plan & CIL:

Qualitative improvements to the Borough's open spaces are likely to require CIL funding during the plan period.

Annex 1: Table of Identified Infrastructure Schemes

Transport Infrastructure: Local roads, buses, rail, walking and cycling, car parking, electric vehicle charging points

Utilities and Physical Infrastructure: Water supply and sewerage, electricity, gas, flood risk management, waste management and disposal

Social and Community Infrastructure: Early years provision, primary and secondary education, post 16 education, general practice (GP) and community health infrastructure, adult social care, sports facilities, community centres, cemeteries, community safety

Emergency Services: Police, fire service, ambulance

Green Infrastructure: Parks and gardens, Local Nature Reserves, Epsom Common

Transport Infrastructure

Scheme	Evidence	Lead delivery agency/ contact	Cost	When	Does scheme help mitigate impact of new development ?	Funding Sources	Risks and Contingencies
Multiple schemes identified through the Epsom & Ewell Forward Transport Programme.	Local need	Surrey County Council	£50 million as a minimum	Over the Local Plan period	Yes	CIL / Local Economic Partnership (LEP) / Local Transport Plan LTP	An interim update is currently underway for the Epsom & Ewell Forward Programme, although as the Local Plan progresses it will be subject to a full review to ensure schemes are responsive to new development.
Crossrail 2	Regional project	Crossrail 2 team	Unknown	Potential to be delivered by 2030	Yes	Unknown	Scheme is still in the early stages.

Utilities and Physical Infrastructure

Flood Risk Management

Scheme	Evidence	Lead delivery agency/ contact	Cost	When	Does scheme help mitigate impact of new development ?	Funding Sources	Risks and Contingencies
Chambermead Project: Diversion of the Green Lanes stream across the Chambermead grass meadow	Hogsmill Catchment Partnership	EEBC South East Rivers Trust	Approx. £100k	2018 to 2020	Scheme will help to alleviate flood risk and bring biodiversity benefits	£10k from South East Rivers Trust, Thames Water	
Store surface water runoff in a series of detention basins, ponds or wetlands to reduce the runoff rate and volume. Interrupt surface water sewer upstream of Stoneleigh allotment gardens to reduce downstream volumes, the risk of sewer flooding and attenuate flows to reduce peak runoff	Surface Water Management Plan	EEBC / LB Sutton	Unknown	2013 to 2017	Yes. Will help reduce the risk of flooding	EEBC / LB Sutton / CIL	No further action but still assumed to be a valid scheme.

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Ewell Town Centre and South Horton Flood Alleviation Scheme	Surrey Flood Risk Management Group	Surrey CC	£1,000,000	Project parked until 2023	Yes. Will help reduce the risk of flooding	Approx £30k allocated from Surrey Flood Risk Management Group	Still a valid scheme.
Flood alleviation schemes at Wet Spots locations throughout the Borough: Eps037 Reigate Road, Ewell (91) Eps028 College Road / Reigate Road, Nork (70)	Surrey Wet Spot data. These are a mixture of Quick fix projects that can be resolved with only minor works and cost between £500 to £5000 and	Surrey CC	Various	Unknown. These schemes are ranked in priority order across the whole of Surrey.	Yes. Will help reduce the risk of flooding	SCC	While there are actually 38 wetspots recorded in the Borough only 2 score

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Waste

Scheme	Evidence	Lead delivery agency/contact	Cost	When	Does scheme help mitigate impact of new development ?	Funding Sources	Risks and Contingencies
Additional refuse collection vehicle(s)	Local need	Epsom & Ewell Borough Council	£140,000 per vehicle, per year	2019/20 or 2020/2021	Improves the capacity of existing infrastructure	EEBC / CIL	

Annex 1
Agenda Item 5

Social & Community Infrastructure

Primary and secondary schools

Scheme	Evidence	Lead delivery agency/contact	Cost	When	Does scheme help mitigate impact of new development ?	Funding Sources	Risks and Contingencies
Primary provision need of 3 to 5 additional forms (3 if housing target is 418 and 5 if 579)	Local need	Surrey County Council	New provision of 2 FE £5,947,130 3 FE £8,401,295	Anticipated to be 2021/22	Improves the capacity of existing infrastructure	CIL	The estimated cost is based on the delivery of new provision. It may be possible to reduce these costs although a greater certainty of housing location is required.
Secondary provision need of 5 to 8 additional forms (5 if housing target is 418 and 8 if 579)			New provision of 8FE school £25,424,630	Anticipated to be 2021/22			The estimated cost is based on the delivery of new provision. It may be possible to reduce these costs although a greater certainty of housing location is required.

Health Care GP Provision

Scheme	Evidence	Lead delivery agency/ contact	Cost	When	Does scheme help mitigate impact of new development ?	Funding Sources	Risks and Contingencies
9.9 full time GPs will be required by 2032 to serve the increased population	Response to IDP consultation		unknown	To mitigate an addition al 7,106 homes over the plan period	Yes	CIL	CIL is unlikely to fund revenue costs but could fund some supporting capital costs.

Cemetery Provision

Scheme	Evidence	Lead delivery agency/ contact	Cost	When	Does scheme help mitigate impact of new development ?	Funding Sources	Risks and Contingencies
Epsom Cemetery extension	Local need	Epsom & Ewell Borough Council	£654k	2018	Improves the capacity of existing infrastructure	EEBC / CIL	

Community and Wellbeing Centre

Scheme	Evidence	Lead delivery agency/ contact	Cost	When	Does scheme help mitigate impact of new development ?	Funding Sources	Risks and Contingencies
Potential expansion / enhancement of Community and Wellbeing Centre	Local need	Epsom & Ewell Borough Council	?	2019	Improves the capacity of existing infrastructure	EEBC / CIL	Scheme is yet to be explored in detail.

Emergency Services

Police

Scheme	Evidence	Lead delivery agency/contact	Cost	When	Does scheme help mitigate impact of new development ?	Funding Sources	Risks and Contingencies
Equipping additional staff (start-up equipment, recruitment and training cost)	Response to IDP consultation	Surrey and Sussex Police	£263,717 (officer) £50,336 (support staff)	To mitigate an addition al 7,106 homes over the plan period	Yes	CIL	Other sources of funding are limited for this infrastructure cost. Staffing costs should be covered by national and local funding
Increasing vehicle fleet capacity	Response to IDP consultation	Surrey and Sussex Police	£332,845	To mitigate an addition al 7,106 homes over the plan period	Yes	CIL	Other sources of funding are limited for this infrastructure cost. Staffing costs should be covered by national and local funding
Workplace accommodation for additional officers and staff	Response to IDP consultation	Surrey and Sussex Police	£604,107	To mitigate an addition	Yes	CIL	Other sources of funding are limited for this infrastructure cost. Staffing

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				al 7,106 homes over the plan period			costs should be covered by national and local funding
Additional ANPR cameras	Response to IDP consultation	Surrey Police	TBC	To mitigate an addition al 7,106 homes over the plan period	Yes	CIL	Other sources of funding are limited for this infrastructure cost. Staffing costs should be covered by national and local funding The number and location of cameras is driven by the scale and location of the proposed development

Fire and Rescue

Scheme	Evidence	Lead delivery agency/contact	Cost	When	Does scheme help mitigate impact of new development ?	Funding Sources	Risks and Contingencies
Development of a replacement Fire Station	A longstanding need to replace the existing fire station	Surrey County Council Surrey Fire and Rescue Service	Unknown	During the Local plan period	Yes and will help facilitate new housing development	CIL	This need is longstanding.

Green Infrastructure

Open Space

Local Nature Reserves and Epsom Common

Scheme	Evidence	Lead delivery agency/contact	Cost	When	Does scheme help mitigate impact of new development ?	Funding Sources	Risks and Contingencies
Various schemes listed in the management plan to maintain and enhance Horton Country Park	Horton Country Park Local Nature Reserve Management Plan 2017 to 2117	Epsom & Ewell Borough Council	Annual cost of delivering the plan: approximately £93k. £933k over a 10 year period.	Mostly ongoing with a number of one off projects	Yes. Helps to maintain an important piece of open space including its function as a biodiversity reservoir	Up until 2020 Horton CP and Epsom Common will receive funding from the Environmental Stewardship Higher level Scheme (approx. £36k per annum). Agri Environment Scheme basic payments are received on an ad hoc	A number of schemes are dependent on volunteers. After 2020 Horton CP will not qualify for the Environmental Stewardship Higher Level Scheme. Brexit has cast uncertainty over the future of the Agri Environment Scheme payments.

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						basis £8 to 10k per year for both Horton CP and Epsom Common.	
Various schemes listed in the management plan to maintain and enhance Epsom Common	Epsom Common Management Plan 2016 to 2116	Epsom & Ewell Borough Council	Annual cost of delivering the plan: approximately £49k. £493k over a 10 year period.	Mostly ongoing with a number of one off projects	Yes. Helps to maintain an important piece of open space including its function as a biodiversity reservoir	Up until 2020 Horton CP and Epsom Common will receive funding from the Environmental Stewardship Higher level Scheme (approx. £36k per annum). Agri Environment Scheme basic payments are received on an ad hoc basis £8 to 10k per year for both Horton CP	A number of schemes are dependent on volunteers

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						and Epsom Common.	
Various schemes listed in the management plan to maintain and enhance the Hogsmill Local Nature Reserve	Hogsmill Local Nature Reserve Management Plan 2017 to 2117	Epsom & Ewell Borough Council	Annual cost of delivering the plan: approximately £35k. £347k over a 10 year period.	Mostly ongoing with a number of one off projects	Yes. Helps to maintain an important piece of open space including its function as a biodiversity reservoir	There are currently no funding streams for Hogsmill Local Nature Reserve	A number of schemes are dependent on volunteers
Epsom Common: Installation of a hard surface pathway from Great Pond to the hard surface bridleway	Epsom Common Management Plan	EEBC Countryside Team	£15k-£20k	2018 to 2020	Helps improve access to a form of infrastructure	CIL?	No other sources of funding identified?
Epsom Common: Breeding Bird Survey on Epsom & Ashtead Common	Epsom Common Management Plan	EEBC Countryside Team	£2.5k - £3k	Annually	Helps to maintain an existing piece of infrastructure	CIL?	No other sources of funding identified?
Epsom Common & Horton Country Park: Veteran Tree Management Plan	Epsom Common and Horton Country Park Management Plan	EEBC Countryside Team	£5k per year	Annually	Helps to manage an existing piece of infrastructure	Funding from Natural England is available on an ad hoc basis	Existing source of funding is intermittent
Horton Country Park: Resurfacing of paths	Horton Country Part	EEBC Countryside Team	£100k	2018 to 2028	Helps improve access to a	CIL?	No other sources of funding identified?

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	Management Plan				form of infrastructure		
Horton Country Park: Dam maintenance and desilting at Meadow Pond	?	EEBC Countryside Team	£20k	?	Helps to manage an existing piece of infrastructure	CIL?	No other sources of funding identified?
Hogsmill LNR: Hard surface pathway along the Hogsmill	Hogsmill LNR Management Plan	EEBC Countryside Team	£15k to £20k or up to £75k if the whole stretch were to be resurfaced	?	Helps improve access to a form of infrastructure	CIL?	No other sources of funding identified?
Hogsmill LNR: Ewell Court Wetland Scheme – diverting the river to create a wetland	Hogsmill LNR Management Plan	EEBC Countryside Team	£100k	2018 to 2023	Scheme will help to alleviate flood risk and bring biodiversity benefits	CIL?	No other sources of funding identified?

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DUTY TO CO-OPERATE ENGAGEMENT PLAN

Head of Service/Contact: Ruth Ormella, Head of Planning

Urgent Decision?(yes/no) No

Annexes/Appendices (attached):

Other available papers (not attached): The Localism Act 2011
The National Planning Policy Framework July 2018
Kingston & North East Surrey Strategic Housing Market Assessment September 2016

Report summary

Meeting the duty to co-operate is a key requirement of national planning policy. In the absence of a strategic planning tier, the government is placing increasing emphasis upon local authorities working together to address the major planning issues that impact upon their areas. In particular, they consider this a key mechanism that will help local planning authorities meet their housing needs in full; through a process of voluntary redistribution.

The Borough Council is already in the process of forming strategic relationships. This report sets out a framework for further developing those relationships so that the Borough Council can submit a sound Local Plan for examination.

Recommendation (s)

That the Committee considers the proposed engagement plan and subject to any suggested additions and amendments agrees to its implementation.

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

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

2 Background

- 2.1 The Localism Act 2011, under Section 110, introduced the requirement that local planning authorities must co-operate with all relevant parties, particularly neighbouring local planning authorities, in planning for sustainable development. The requirement is specific to the preparation of local plans; especially in relation to strategic matters that have cross-administrative boundary impacts.
- 2.2 The duty to co-operate was introduced by the previous coalition government to fill the strategic-planning vacuum left in the aftermath of the revocation of the regional planning tier. The intention was that local planning authorities could apply the duty as a loose framework around which they could work to “willingly” co-operate and make decisions on strategic issues. The duty has failed to function as intended. The guidance prepared to support it is vague and although it is intended to form the basis of strategic decision making, it lacks any requirement that the parties involved arrive at any form of agreed position. After seven years, strategic planning is a rarely encountered phenomenon.
- 2.3 Since its introduction the anticipation, from government and the Planning Inspectorate, has been that the duty be used as a key part of the local plan making process. On a basic level it had been assumed that local planning authorities would willingly enter into “memorandums of understanding” or “statements of common ground” on important cross-boundary issues. The above mentioned statements would; along with a catalogue of meetings, minutes and notes; serve to demonstrate a strategic narrative that could be placed before an Inspector to evidence that the duty had been discharged.
- 2.4 Over time this understanding has evolved. The experience from recent local plan examinations is that Inspectors expect local planning authorities to utilise the duty as a mechanism to collectively meet the housing need, of their housing market area, in full. This was the case with the Castlepoint¹ examination, where the Inspector criticised (in his interim report) the authority and all its neighbours due to their failure to prepare a coherent collective strategy for meeting their housing need in full.

¹ Castlepoint is a local authority in South Essex. Their new local plan was the subject of an examination in public during 2017. Following the publication of the Inspector’s interim report, their local plan submission was withdrawn.

- 2.5 In order to address the strategic planning deficit the revised National Planning Policy Framework (the NPPF) places an enhanced emphasis upon local planning authorities working together to deliver sustainable growth. The expectation is that local planning authorities will willingly coalesce into strategic groupings under which they can prepare strategic policies relating to growth – specifically in relation to meeting housing and infrastructure needs. In the absence of any requirement that partners must reach agreement, it is assumed that the scale of housing need (both met and unmet) will serve as sufficient encouragement for local planning authorities to “work together co-operatively”.

3 Proposals

- 3.1 When considered alongside other national planning policy requirements; most notably those relating to the preparation of a housing strategy² and on-the-ground housing delivery³; it is clear that meaningful engagement with our neighbours will be of critical importance to our new Local Plan being found sound⁴. Evidence to date suggests that it will not be possible for our new Local Plan to identify sufficient sources of available, deliverable and developable sources of housing land supply to meet our objectively assessed housing need in full. Consequently, our housing strategy will in part be dependent upon additional sources of housing land supply being made available, to meet our needs, beyond our administrative boundary. Engaging with our neighbours, even if we cannot reach agreement with them, will be a necessary part of the evidence base supporting our emerging housing strategy.
- 3.2 We already have established relationships with some of our neighbours. We have successfully worked with some of them⁵ in the preparation and production of our Strategic Housing Market Assessment (SHMA). We have already begun active engagement with these partners and even mooted the possibility of a combined housing strategy. Together we have met with representatives from the Greater London Authority in an attempt to make them understand the unique challenges that we face. The latter meeting took place during February 2018.
- 3.3 Although our work to date demonstrates a level of co-operation it is believed that it will not be enough to meet the tests of soundness, or the expectations of the examining Inspector. At the least we will be required to have agreed statements of common ground prepared and maintained between ourselves and our neighbours. Whilst these will demonstrate on-going joint working, it is unlikely that they will, by themselves, lead to agreements on the re-distribution of housing across our sub-region.

² NPPF Paragraphs 20, 24 -27, 60 and 65.

³ NPPF Paragraphs 73 – 76.

⁴ Local plans are tested for their “soundness”. The four tests of soundness are set out under NPPF Paragraph 35. Meeting the duty to co-operate is considered to fall under all four tests; to a greater or lesser extent.

⁵ For the purposes of our SHMA, our housing market area partners are the Royal Borough of Kingston; Elmbridge and Mole Valley.

- 3.4 We propose to arrange regular meetings with our neighbours during Autumn 2018. The first meetings will be with those partners that we have already formed a relationship with, namely, the Royal Borough of Kingston; Elmbridge; and Mole Valley. In parallel, we will seek to meet with other relevant neighbours. We envisage that these could include the London Borough of Sutton; Reigate & Banstead; and Guildford.
- 3.5 It is anticipated that the initial meetings will identify and confirm the strategic issues that connect us to these neighbouring authorities. We believe that these issues include – housing land supply; the Green Belt; education infrastructure; the race horse training industry; and strategic transport infrastructure. This will provide a baseline position from which we can prepare statements of common ground. Once these have been prepared in draft form they will come before this Committee for consideration. It is projected that this could happen by early Summer 2019.
- 3.6 Securing agreed statements of common ground with our neighbours will be a positive step forward in demonstrating that we have met the duty to co-operate. However, none of our neighbours are currently preparing local plans that seek to accommodate a greater amount of growth than that identified for them through the Standard Method⁶. Some of neighbours have stated that they do not have sufficient capacity to meet either their own needs or those of any of their neighbours.
- 3.7 In order to address this matter we are seeking the Committee's agreement that, when necessary, we will undertake a strategy of actively identifying opportunities to meet our unmet housing need on sites beyond our administrative boundary. **This approach may require the Borough Council to make formal objections to local plans being prepared by our neighbours.** It may also require us to identify sites beyond our boundary to specifically meet our unmet housing need. These proposed measures are extraordinary and may not be well received by our neighbours. However, within the context of national planning policy and the government's approach to housing growth such actions may prove necessary if we are to meet the requirements set out in national planning policy in order to secure a sound Local Plan.
- 3.8 The following table provides an overview of the progress being made by our neighbours in preparing their local plans.

⁶ The Standard Method is the approach that national planning policy requires local plans use to determine the minimum number of homes needed within their area over the plan period. This is set out under NPPF Paragraph 60.

Local Planning Authority	Standard Method OAHN	Most Recent Stage	Next Stage of Local Plan Process	Submission to Secretary of State for Examination
Epsom & Ewell Borough Council	579 new homes p/a	Issues & Options Consultation 2017	Draft Local Plan Pre-submission consultation Autumn 2019	End of 2019/ early 2020
Elmbridge	612	Strategic Options Consultation 2016/17	Published timetable now out of date	Published timetable now out of date
Mole Valley	441	Issues & Options Consultation 2017	Draft Local Plan Pre-submission consultation Spring 2019	End of 2019
Reigate & Banstead	644	Core Strategy Adopted 2014		
Royal Borough of Kingston	1527	Awaiting outcome of London Plan	Published timetable now out of date	Published timetable now out of date
London Borough of Sutton	1774	Adopted new Local Plan 2018		
Guildford	789	Main Modifications consultation following examination		

4 Financial and Manpower Implications

- 4.1 The preparation and implementation of our new Local Plan imposes significant demands on staff in the Planning Policy Team and the wider Planning Department. The preparation of a duty to co-operate engagement plan sets out a process that can be synchronised with the Local Plan Programme in order to provide performance indicators for monitoring progress. These can be utilised to identify whether additional resources will be required.
- 4.2 Securing a positive response to our objectively assessed housing need, by sustainably optimising future housing growth, provides the Borough Council with an opportunity to significantly increase receipts from the Community Infrastructure Levy and Council Tax. These can be redeployed to help fund infrastructure improvements and services to our residents.

4.3 ***Chief Finance Officer's comments: None for the purposes of this report.***

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

5.1 The Localism Act 2011 requires the Borough Council to engage with relevant partners when addressing the strategic elements of our Local Plan. Meeting the duty to co-operate is a key requirement within the tests of soundness.

5.2 ***Monitoring Officer's comments: comments have been included within the content of the report.***

6 Sustainability Policy and Community Safety Implications

6.1 None for the purposes of this report.

7 Partnerships

7.1 The government has envisaged that the duty to co-operate provides an alternative partnership framework to replace the now historic regional planning structures. However, the duty to co-operate is not fully supported by any statutory governance structures. It is a framework predicated on a willingness between partners to positively work together to meet shared objectives. The government (through the DCLG and MHCLG) has frequently stated it is not a duty to reach agreement. Consequently, the partnerships built through this process can prove fragile and potentially divisive.

7.2 This report sets out the justification for forming partnerships with our neighbours on strategic planning matters through the duty to co-operate.

8 Risk Assessment

8.1 Meeting the duty to co-operate is a key requirement in securing a sound local plan. We will need to demonstrate a clear narrative of how our engagement with our neighbours has shaped the development of our Local Plan. We will also require agreed statements of common ground between relevant neighbouring authorities and ourselves. The supporting narrative will need to identify where we have diverged from our neighbours and the reasons why we may not have been able to reach agreement. The strengthening of the Duty, as a strategic planning mechanism, means that we can no longer justify unmet housing through a statement that outlines our best endeavours. Rather it is evolving into a strategic process that secures new housing growth and associated infrastructure.

- 8.2 Should the Borough Council decide to pursue a housing strategy that is dependent upon the delivery of sources of housing land supply beyond our administrative boundary (to meet unmet need), then it will need to take appropriate action to promote such an approach. There is a risk that this could undermine relationships with some of our neighbouring authorities. It should be noted that parties that may be promoting sites in our Borough could also be the parties who are seeking to promote sites in adjoining Boroughs that may not have been prioritised. Where these opportunities arise there are strong rationale for working together.
- 8.3 However, the risk of not having a sound Local Plan is not acceptable and it is from this position that the proposed approach is recommended..

9 Conclusion and Recommendations

- 9.1 That the Committee considers the proposed engagement plan and subject to any suggested additions and amendments agrees to its implementation.

Ward(s) affected: (All Wards);

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EPSOM & EWELL LOCAL PLAN: LONGMEAD & NONSUCH INDUSTRIAL ESTATES CAPACITY STUDY

Head of Service/Contact:	Ruth Ormella, Head of Planning
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	
Annexes/Appendices (attached):	Annexe 1: The Longmead & Nonsuch Industrial Estates Capacity Study
Other available papers (not attached):	Strategic Housing Land Availability Assessment (June 2017) Strategic Housing Land Availability Assessment (March 2009)

Report summary

The Longmead & Nonsuch Industrial Estates Capacity Study has been prepared to explore and assess the potential opportunities that these areas may provide as sources of housing land supply. This latest Study positively contributes to our developing narrative that explains how we have “looked under every stone”.

Recommendation (s)

- (1) That the Committee notes the contents of the Study and agree to it being used to inform the preparation and production of the new Local Plan and the associated Transformation Masterplan.**

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

- 1.1 The delivery and implementation of the Epsom & Ewell Local Plan contributes towards all of the Council’s Key Priorities. Our emerging new Local Plan will set out how we will meet our objectively assessed housing need through sustainable growth over the next twenty years. The Longmead & Nonsuch Industrial Estates Capacity Study is an important piece of evidence that will sit alongside other documents that inform the preparation and production of our new Local Plan.

2 Background

- 2.1 The government's National Planning Policy Framework (NPPF) requires local planning authorities to identify land for new homes. Specifically the NPPF requires that we have a clear understanding of "...the land available in our area through the preparation of a strategic housing land availability assessment. From which planning policies should identify a sufficient supply and mix of sites..." (NPPF Paragraph 67).
- 2.2 In the course of identifying new site allocations to meet our housing need the Borough Council has already prepared two Strategic Housing Land Availability Assessments. These have sought to identify potential sources of housing land supply that are genuinely available, deliverable and developable – namely, sites that can come forward straightaway to meet our housing need. The most recent of these Assessments came before this Committee during June 2017, whilst the earlier came before the Borough Council's Planning Policy Sub-Committee during 2009. Both are considered comprehensive and robust pieces of evidence, and have informed the development of the new Local Plan.
- 2.3 The Borough Council may not have fully considered every piece of existing urban land that could become available as sources of housing land supply. The Borough's large employment areas could provide a source of housing land supply – through comprehensive redevelopment delivering a mix of employment (on the ground and lower levels) and residential (on the upper floors).
- 2.4 In order to ensure that we have a clear understanding of the land that is genuinely available for future housing we have carried out additional assessments of all possible sources of housing land supply located within the Borough's existing urban area. The first of these assessments focusses on the possible housing land supply opportunities that may exist on the Longmead and Nonsuch Industrial Estates. A copy of the Study is included under Annexe 1.

3 The Longmead & Nonsuch Capacity Study

- 3.1 The Longmead & Nonsuch Capacity Study considers the potential housing land supply capacity that could be available from these two important employment sites. The Study examines the landownership parcels within these sites and assesses their ability to become available, deliverable and developable sources of housing land supply during the new Local Plan period. In simple terms it asks the question; could these sites come forward with certainty during the next twenty years and if so how many new homes might they deliver?
- 3.2 The Study objectives are as follows:
 - Identify existing on-site and adjacent uses to the industrial areas

- Gather intelligence relating to occupation, investment, potential constraints or opportunities, aspirations of landowners and accessibility
- Explore scenarios as to how the sites could evolve in the future to deliver a varying degree of housing alongside a mix of employment uses
- Conduct a SWOT analysis (strengths, weaknesses, opportunities and threats) of these scenarios and make conclusions and recommendations.

3.3 A desktop review and site visits were carried out and the findings were analysed to create three potential scenarios for housing development on the site. These importantly all included the retention of as much commercial floorspace as possible to maintain the economic vitality of the Borough. In order to ensure that the resulting development mix remained financially viable, and therefore deliverable; the three scenarios focussed upon high density housing types.

3.4 The three potential redevelopment scenarios are summarised below:

1. Retention of the majority of the site as employment land

This scenario envisages the retention of the majority of the site as Employment Land, broadly in accordance with its current uses. It welcomes the opportunities for new residential uses on an ad-hoc basis, if and when they arise.

This scenario requires the minimum level of intervention from the local planning authority. As a consequence it would result in piecemeal loss of employment sites as and when the market dictates. This is similar to our current approach but would require a change in policy to allow for the loss of some employment floorspace in the identified employment area. It is anticipated that the delivery of this option would only deliver a modest number of new homes – approximately 100 units.

2. Redevelopment of a proportion of the area as high density residential accommodation

This scenario envisages the redevelopment of a significant proportion of the site. Primarily those that fall within one or a limited number of landownerships. Again this scenario envisages mixed-use development including high density residential uses to the upper storeys. It is assumed that the second scenario would seek the retention of the remainder of the site for intensified employment land uses but would welcome residential opportunities on an ad-hoc basis

The Study concludes that this approach is more likely to be implemented in the long-term. That is beyond the new local plan period (post 2032). The Study makes this conclusion on the basis that there is no evidence that any of the existing landowners (including long leaseholders) are looking to redevelop or re-locate. This option would require intervention from the Borough Council. It is also concluded that it would require a change in the commercial land market to make the scenario viable¹.

3. *Comprehensive Transformation*

This final scenario envisages the comprehensive redevelopment and transformation of both Industrial Estates in their entirety. The Study envisages that this scenario would be comprised of high density residential and intensified employment uses provided in the most appropriate locations across both Industrial Estates.

The Study concludes that this approach is more likely to be implemented in the long-term. As with the second scenario, implementation would be beyond the new local plan period (post 2032) as there is no evidence currently that any landowners are looking to redevelop or re-locate. This option would require significant intervention from the Borough Council and a change in the commercial land market to make the scenario viable. This option would inevitably result in the loss of a considerable amount of employment floorspace. This would have a negative effect on the economic vitality and viability of the Borough.

4 **Conclusions**

- 4.1 The main purpose of the Study was to evaluate the two industrial estates as potential sources of housing land supply. The Study concludes that the three emerging scenarios could yield between 100 to 2700 additional new homes.
- 4.2 However, the Study concludes that there is no certainty to any of these approaches. The Study has found no evidence to indicate that any of the sites across both Industrial Estates are genuinely available for redevelopment for non-commercial uses. The evidence does demonstrate that there are very few vacant units across both Industrial Estates; that there is a diverse range of well-established commercial activities; and that there is strong evidence of recent and on-going investment in the existing commercial uses and operations. The Study concludes that the evidence demonstrates that both Industrial Estates are economically vibrant and viable as commercial/ employment locations.

¹ The example landowner we have used is purely indicative and we have no reason to believe that they are looking to redevelop/ re-locate or any other information.

- 4.3 The Study identifies some significant constraints to the prospect of mixed-use development coming forward on this site during the Local Plan period. These constraints include practical operational matters, such as lack of land for temporary relocation; development viability constraints, namely that existing uses are very successful, so accordingly land prices and value remain very high; and 'industrial/bad neighbour' uses, which suggest that satisfactory living conditions for future residential uses would not be met.
- 4.4 It is noteworthy that the National Planning Policy Framework 2018 Paragraph 121 states that employment land should only be used for housing if it would not undermine key economic sites. The Study concludes that the redevelopment of the two industrial estates for a mix of commercial and residential uses would undermine their offer as economic sites, and would have an adverse impact on the economy of the Borough.
- 4.5 It is highlighted that the first scenario, comprised of modest ad-hoc residential development, would only deliver a small number of new homes. The Study also notes that it would result in piecemeal development for a relatively small housing yield. The potential housing yield from this scenario would have little impact on the Borough's identified housing need whilst having a negative impact on the overall economic vitality of the site.
- 4.6 The Study concludes that the re-development of the Nonsuch and Longmead Industrial Estates is not a viable option for housing delivery within the new local plan period. There are currently no market drivers indicating that this will be the case. Both Industrial Estates function well with the existing commercial uses. Together they serve as the principle economic/ industrial hub for the Borough. Any loss of economic activity would seriously undermine the economic vitality of the Borough. This consequential impact is a significant consideration to any proposals to identify either as housing allocation sites.
- 4.7 The Borough Council has recently commissioned the preparation of a Borough-wide Transformation Masterplan. It will consider how housing delivery within the existing urban area will be optimised through the application of high quality design, higher residential densities and where appropriate taller buildings. It is recommended that the Masterplan includes how existing commercial and employment sites could be incorporated across the Borough as it transforms.

5 Financial and Manpower Implications

- 5.1 The preparation, publication, examination and implementation of our new Local Plan imposes significant demands on staff in the Planning Policy Team and the wider Planning Department. Since the preparation of our latest Local Plan Programme additional staff resources have been secured and successfully deployed.

- 5.2 However, given the increasing level of complexity to the local plan process (introduced through the new NPPF), particularly in relation to reviewing the local plan every five years, meeting our objectively assessed housing need and the Duty to Co-operate, it may prove necessary to deploy further resources.
- 5.3 Any requests for further resources, to meet our required responsibilities, would need to be referred to the Strategy & Resources Committee for approval.

5.4 ***Chief Finance Officer's comments: None for the purposes of this report.***

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

- 6.1 The new Local Plan will need to demonstrate that it meets the four tests of soundness set out in national planning policy. By providing evidence that we have considered all reasonable and available sources of housing land supply we will be able demonstrate that our new Local Plan has been positively prepared and is justified.
- 6.2 ***Monitoring Officer's comments: None arising from the contents of this report.***

7 Sustainability Policy and Community Safety Implications

- 7.1 The preparation of a new Local Plan will contribute towards delivering the Council objectives for maintaining and enhancing the Borough as a sustainable place to live, work and visit by providing guidance to new development proposals.
- 7.2 The new Local Plan will be subject to a full Sustainability Appraisal report. This will be subject to public consultation at an appropriate time in the process.

8 Partnerships

- 8.1 The Duty to Co-operate requires that Local Planning Authorities engage with partners and neighbouring authorities on strategic issues, including provision of housing land and meeting housing need in full.
- 8.2 We continue to engage with our neighbours as we seek to discharge our Duty to Co-operate. Demonstrating that we have explored all reasonable housing land supply opportunities within the Borough will provide evidence to that process and may influence the identification of an appropriate strategy to respond to housing need.

9 Risk Assessment

- 9.1 The Council is currently unable to demonstrate a five year supply of housing land to meet its objectively assessed housing need and, as such, our Local Plan is considered out of date. Work is progressing to prepare a new Local Plan that will include a new housing target to deliver sustainable growth and respond to our objectively assessed housing need.

- 9.2 Failure to produce a new housing target and the necessary 5 year housing supply could lead planning applications for residential development need to be determined in accordance with Paragraph 49 of the National Planning Policy Framework. This states that without a five year supply adopted Council policies on the supply of housing cannot be considered up-to-date. Without a five year supply there is a presumption in favour of granting planning permission to applications for new housing unless the development can be shown to cause demonstrable harm to other factors that outweigh the need to provide new housing.
- 9.3 By proactively planning for future growth identifying where it should and should not go, we will place ourselves in a stronger position to resist unsustainable levels of growth in the wrong locations. Providing evidence that we have considered all reasonable and available sources of housing land supply supports this approach.

10 Conclusion and Recommendations

- 10.1 That the Committee notes the contents of the Study. The Committee are asked to especially note that there is no evidence that the two Industrial Estates can provide available, viable, deliverable and developable sources of housing land supply, to meet our immediate objectively assessed housing need during the new local plan period.
- 10.2 It is recommended that the Study be used to inform the preparation and production of the new Local Plan and the associated Transformation Masterplan.

Wards affected: Court Ward and Town Ward

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The Longmead and Nonsuch Industrial Estates Capacity Study



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1. Introduction

- 1.1.1 This focused report applies an urban capacity and feasibility study approach to the consideration of the potential of the existing Longmead and Nonsuch Industrial areas for delivering future housing growth. This objective is set against the Borough's significantly increased housing need figure of 579 units per year; as calculated through the government's standard methodology introduced by the Revised National Planning Policy Framework (NPPF) (July 2018). As a key part of developing the new Epsom & Ewell Local Plan, the Borough Council is investigating every opportunity for potential sources of housing supply by 'looking under every stone'. The opportunities offered by these two employment areas is one such stone.
- 1.1.2 The Borough's capacity to deliver new housing is constrained by a number of factors. Being comprised of existing urban areas or Green Belt, the supply of available development sites is now extremely limited. Equally, much of the Green Belt and large areas of the existing urban area are further constrained by primary constraints. These are explored in detail in [the Epsom & Ewell Local Plan Constraints Study \(June 2017\)](#).
- 1.1.3 In the past, the Borough Council has always met its housing targets, although these were considerably lower at 181 units per annum (Core Strategy Policy CS 7 July 2007). A significant source of housing land supply came from the redevelopment of five of former hospital sites in the Green Belt, which has now been completed. Across the rest of the Borough, high housing values have meant that most sites are developed for residential uses as soon as they become available. As a result there are now very few readily available development opportunities and few of any significant size.
- 1.1.4 The government's NPPF requires local planning authorities to identify land for new homes. Specifically the NPPF requires that they have a clear understanding of "*...the land available in our area through the preparation of a strategic housing land availability assessment. From which planning policies should identify a sufficient supply and mix of sites...*" (NPPF Paragraph 67).
- 1.1.5 In the course of identifying the new sites that could come forward to meet the Borough's housing need the Borough Council has already prepared [two Strategic Housing Land Availability Assessments \(2009 and 2017\)](#).¹ These seek to identify potential sources of housing land supply that are genuinely available, deliverable and developable. To summarise, they are sites that can come forward immediately to meet housing need. Both these documents are considered comprehensive, robust pieces of evidence, and show that there are very limited sites to set against our future housing requirements.

¹ The most recent of these Assessments came before the Borough Council's Licensing & Planning Policy Committee during June 2017, whilst the earlier came before the Planning Policy Sub-Committee during 2009.

- 1.1.6 With a dwindling land supply and a significant need for new homes, the Borough Council is now considering other options to deliver new housing. Potential opportunities, which may have not been considered in the past due to the existing on-site uses or policy designations are being explored. The rationale is to leave 'no stone unturned' in a bid to ensure where possible, housing supply is maximised to help meet the identified need. The Longmead and Nonsuch industrial areas are therefore being examined for their future housing potential.

1.2 Planning Policy Context

- 1.2.1 Historically the Local Plan has taken a very cautious approach towards the possible loss of any employment land. This reflects the Borough Council's strategy of optimising the use of existing employment and other commercial (including retail) sites. This approach has largely been successful, demonstrated by the strong performance of these sites throughout recent recessions.
- 1.2.2 The Longmead and Nonsuch Industrial Estates have been protected for employment uses only. These estates were intended to be the primary location for industrial and warehouse development within the Borough. Over the past two decades there has been very little new commercial development within the Borough and both the previous and current policy strategy is to protect the existing employment land provision against losses. The Core Strategy Policy CS 11 (adopted in 2007) reads *"losses of employment land will be resisted in the strategic employment areas of the Longmead and Nonsuch Industrial Estates"*. It goes on to state *"regeneration of employment premises and intensification of employment uses will be encouraged in these locations."*
- 1.2.3 The application of such policies has ensured employment uses on the industrial sites remain. However the nature of these uses have evolved over time and the estate has become more retail focussed with a shift away from pure B2/B8 use classes and an influx of a large number of car sales / repair units and trade warehouses, particularly on the Nonsuch side.
- 1.2.4 The Borough Council is currently producing a new Local Plan, which will guide the development of the Borough up until 2032. Informed by evidence, the Local Plan will respond to the Borough's increased housing need, alongside other competing needs. It will set out a variety of policies and allocations for housing / other various land uses.
- 1.2.5 The recently revised NPPF places great importance on increasing the rate and speed of housing delivery; however, it also states that "significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development". The industrial estates are the focus of a significant proportion of the Borough's employment activity and therefore play an important role in the economic prosperity, vitality and viability of the Borough. These competing needs must therefore be carefully balanced.

1.2.6 Since the adoption of the Core Strategy in 2007 the Council has consulted on employment land allocations as part of an 'Other Sites Consultation Paper' (October 2013). That document proposed the retention of the Longmead and Nonsuch Employment Areas. It was considered that these areas continue to serve as a source of employment land/ floorspace for the Borough. This being provision that cannot be met elsewhere; either at other existing employment sites or upon new employment site allocations. It is particularly noteworthy that both Employment Areas remain viable and fit-for-purpose with high levels of occupancy. They continue to meet the needs of existing and emerging business sectors. The responses made during the Other Sites Consultation process generally supported this proposal.

1.3 Study Objectives

1.3.2 The Study evaluates the potential of the industrial estates for housing. It will take into account recent national policy changes and other up to date information. Its findings will be considered against other evidence to inform the Local Plan and ensure that it strikes an appropriate balance between competing land use needs across the Borough.

1.3.3 The Study considers the potential of the industrial areas to deliver future housing and how this may contribute to the emerging Local Plans housing target. In summary the study objectives are to:

- Identify existing on-site uses and uses adjacent to the industrial areas
- Gather intelligence relating to occupation, investment, potential constraints or opportunities, aspirations of landowners and accessibility
- Explore scenarios as to how the sites could evolve in the future to deliver a varying degree of housing alongside a mix of employment uses
- Conduct a SWOT analysis (strengths, weaknesses, opportunities and threats) of these scenarios and make recommendations.

1.4 Methodology

1.4.1 The first action undertaken by the Study was to identify the extent of the assessment. The geographical area covered by the Study is comprised of the land that falls within the designated Longmead and Nonsuch industrial areas, including the area occupied by the Sainsbury's food store on the Kiln Lane side. This is shown on Figure 1.

Desktop Review

1.4.2 The next action for the assessment was to undertake a desktop review of the existing information available. This included;

- A review of the relevant planning history on the site (for example applications for change of use/ significant refurbishment signalling investment in the site).
[See Annex 1.](#)

- A review of the Geographical Information System (GIS) data layers available; inclusive of the creation of maps showing the information to help guide appropriate locations/ densities and restrictions. Available information includes: land ownership/ Flood Zones and Critical Drainage Areas/ Planning Constraints such as Conservation Areas, Article 4 Areas, Listed Buildings/ Historic landfill Site/ Cycle Routes/ Road Network/ Footpaths and Bridleways
- Kiln Lane Link investigative work. Two documents prepared by 'Economic Growth Management' for Surrey County Council. 1) Economic case for the Kiln Lane Link Road- findings from interviews with Freeholders and Major Site Leaseholders. 2) Findings from interviews with Commercial Property Agents. (2014)
- Discussions with the Borough Council's Head of Property
- Review of commercial market conditions; this included online searches for vacancies. See [Annex 2](#) for the two available marketing papers for the site.

Site Visit

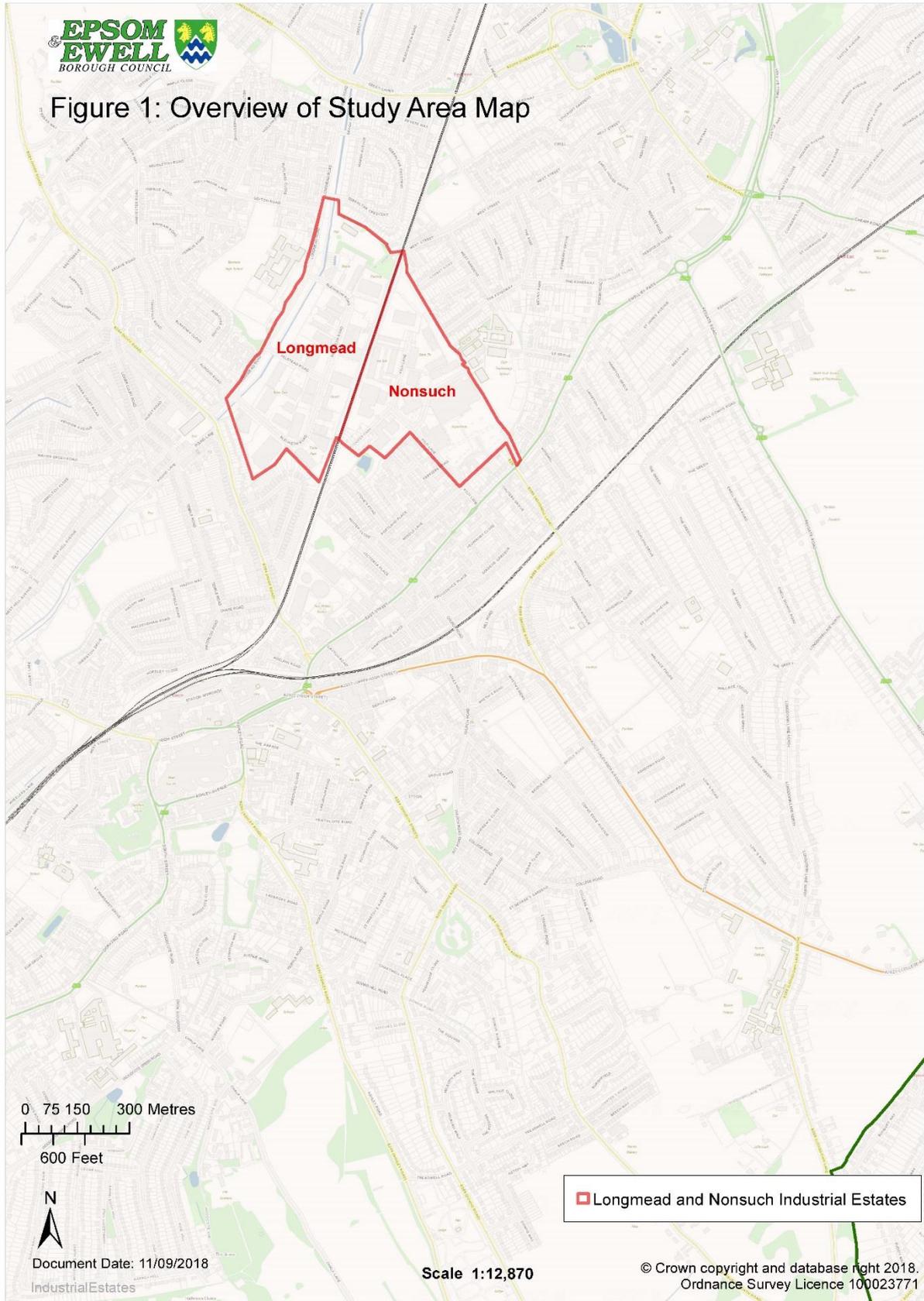
- 1.4.3 A site visit was carried out in July 2018 to appraise the existing on-site uses, condition of units, vacancies, quality of the environment, evidence of recent investment, and obvious opportunities for intensification / mix of uses. A photographic record was made where possible.

Analysis of findings

- 1.4.4 The background data was collated into our GIS and subject to further analysis. This was used to create three potential deliverable scenarios. A summary of these scenarios is provided alongside a Strengths, Weaknesses/ Opportunities/ Threats (SWOT) analysis of each.
- 1.4.5 The Study concludes by drawing all of the above actions to provide the Borough Council with a series of Conclusions & Recommendations.

2. Overview of Study Area

- 2.1.1 The Longmead and Nonsuch Industrial Estates are located to the north of Epsom Town Centre, between the B284 Hook Road and the A24 Epsom Road. They are dissected by the north/ south Waterloo mainline railway line with no direct vehicular access, across the railway line, to each other. The entire site covers an area of approximately 35 hectares. A location plan is included under Figure 1 below.
- 2.1.2 The Longmead Industrial Estate or Employment Area is located to the west of the railway line and is accessed via the Longmead Road. The site is approximately 20 hectares of industrial and warehouse units varying in size from small start-up units to large storage centres.
- 2.1.3 The Nonsuch Industrial Estate or Employment Area is located to the East of the railway line and is approximately 15 hectares. The site includes a large Sainsbury's Superstore, a Halfords and a Wickes. There are a number of smaller scale industrial units set in their own 'business parks' and a variety of car dealership franchises. Again these are of varying sizes and use classes. The site is accessed via Kiln Lane from the junction with the main A24 that runs through the entire Borough. The Industrial Estate is in a highly sustainable and accessible location.



2.2 Existing Uses across the Study Area

- 2.2.1 There is a diverse range of employment uses across the study area, which are housed in a wide variety of different sized units. The units and their occupiers are identified on a map and list that are included under [Annex 4](#). The resident uses mostly fall within the B2 or B8 use class. Many of them have a strong retail element including retail warehouses, units selling trade paints, tyres, blinds and domestic hire shops. For town planning purposes these uses are mostly classified as falling within the Sui Generis Uses class due to their mixed-use nature.
- 2.2.2 There is also a prevalence of motor vehicle sales and repair facilities across both industrial estates. For town planning purposes these fall under both the Sui Generis and B2 uses descriptions. Figure 2 shows a broad overview of the types of uses in different parts of the sites.
- 2.2.3 There are two residential buildings located within the study area, which are the temporary homelessness prevention accommodation units and the new affordable housing units at Maritime Court.



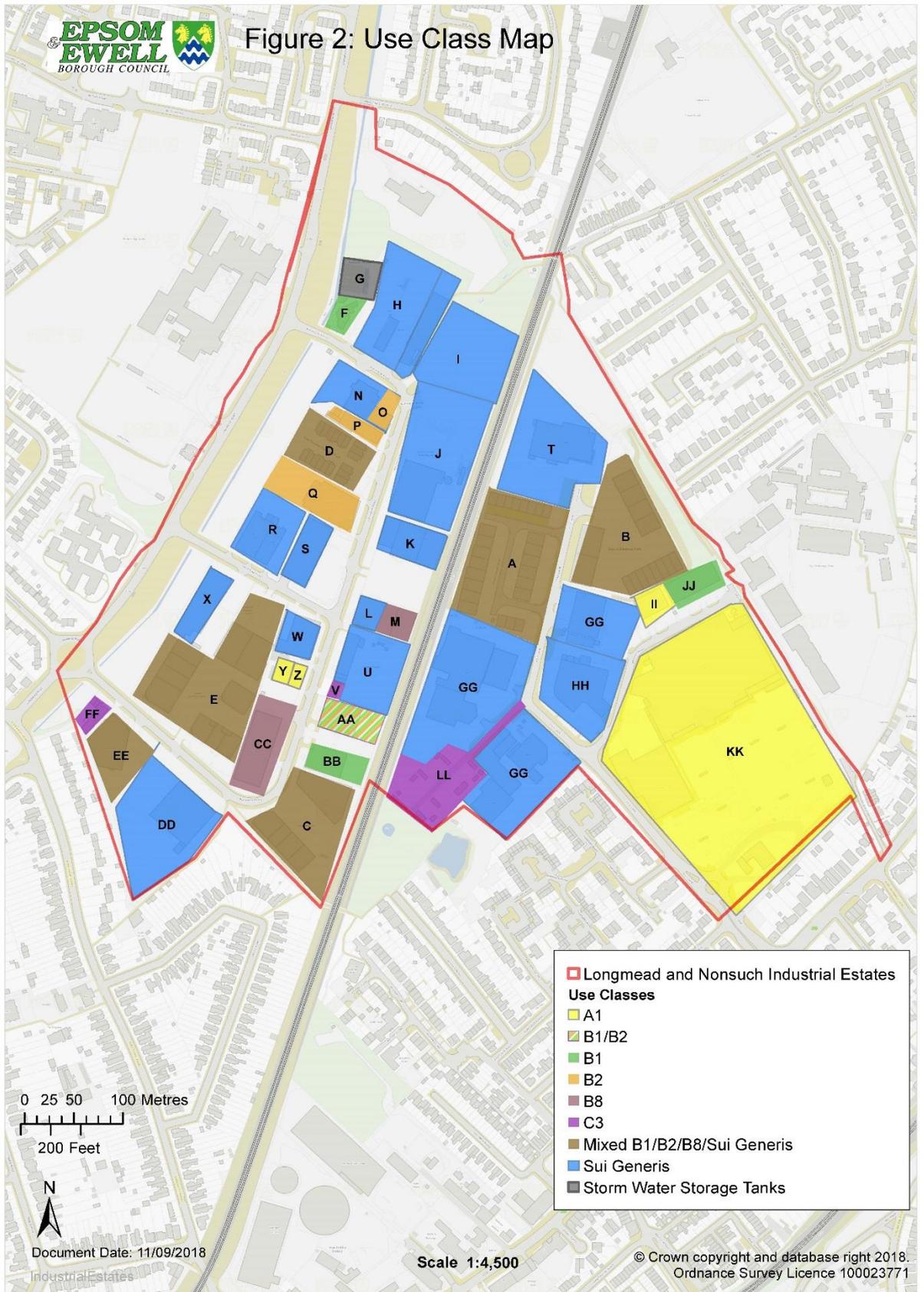
Temporary homelessness prevention accommodation situated on the Longmead Industrial Estate



Vacant Industrial Unit on the Nonsuch Industrial Estate

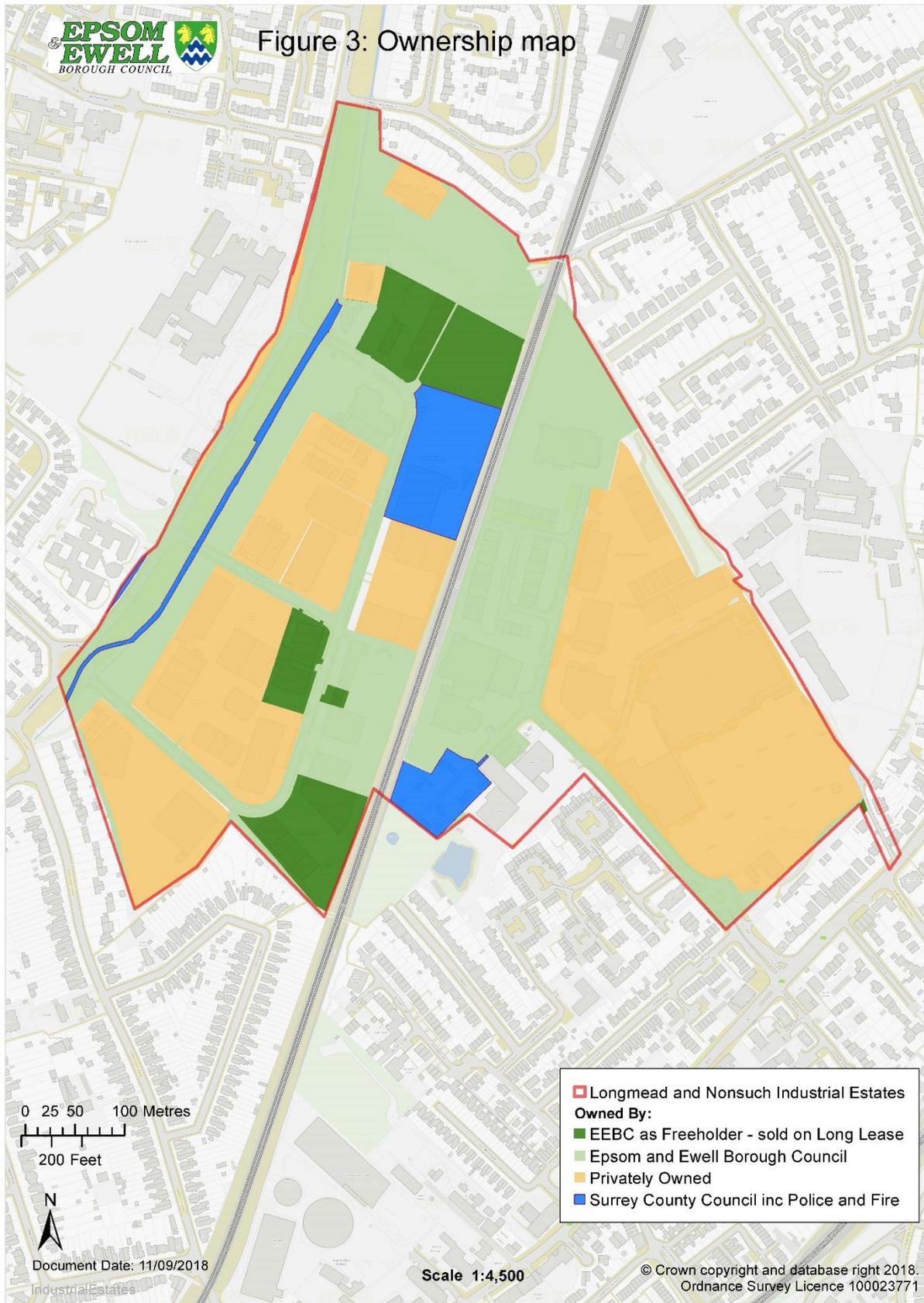
2.2.4 At the time of the site visit there were three vacant industrial units. One of these was located on the Nonsuch Industrial Estate. The other two were located on the First Quarter Business Park.

2.2.5 It was noted that there were also several units being marketed as vacant/available within Blenheim House; this being a mixed-use office and commercial unit building.



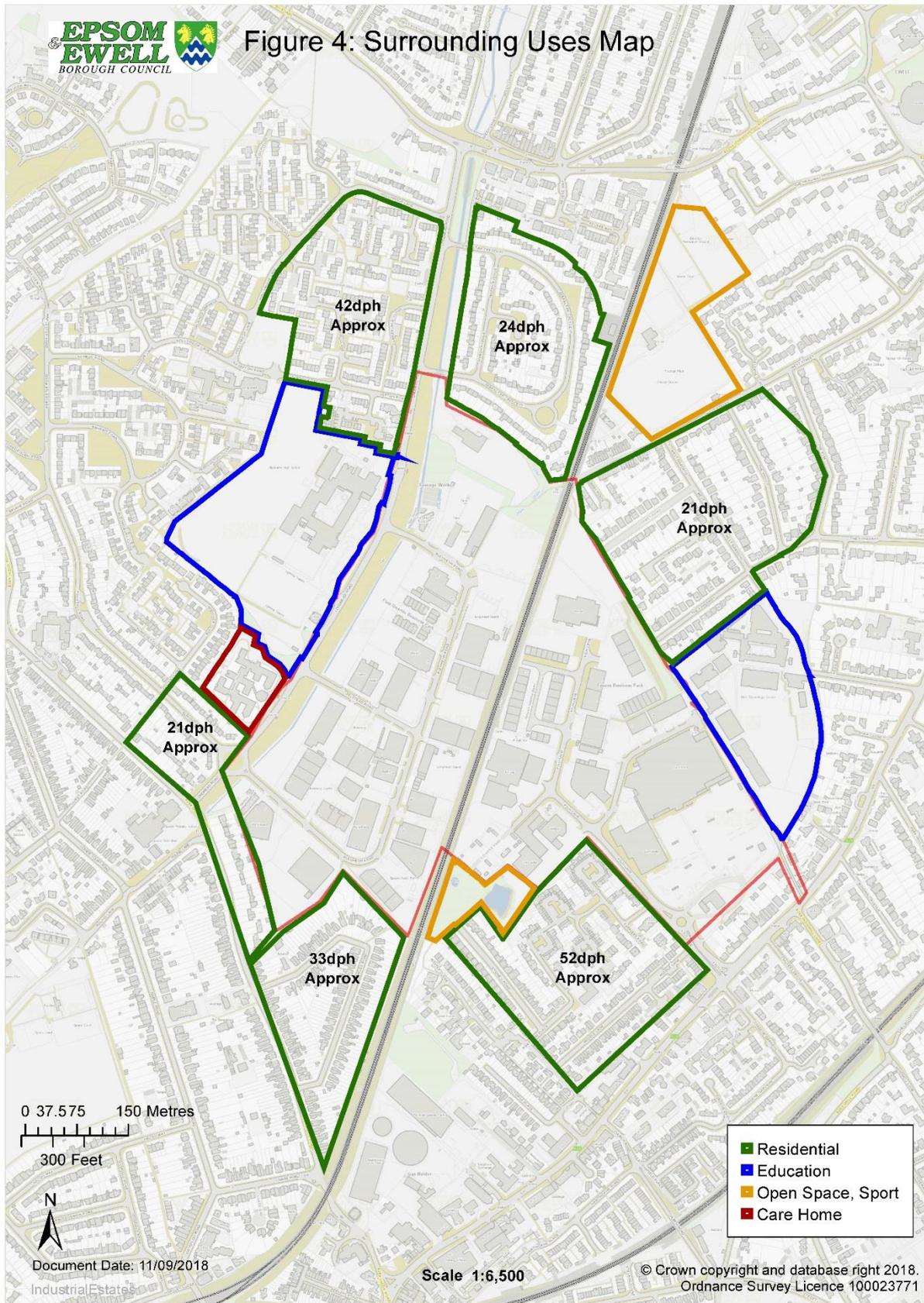
2.3 Landownership

- 2.3.1 The Industrial Estates are in mixed land ownership including Private Landowners/ freeholders/ leaseholders, the Local Authority and Public Sector (Housing Association). The distribution of landowners is shown on Figure 3 (ownership map).
- 2.3.2 Some landownerships are extensive in and contiguous in coverage across the Industrial Estates. This appears to suggest that subject to interest from these landowners comprehensive redevelopment across meaningful portions of the study area could take place. However, the medium-long term status of these ownerships needs to be carefully considered. Whilst relatively large areas of the study area may fall under a single freeholder, these areas may be subject to long leases, which could serve as a significant constraint to their release for redevelopment.



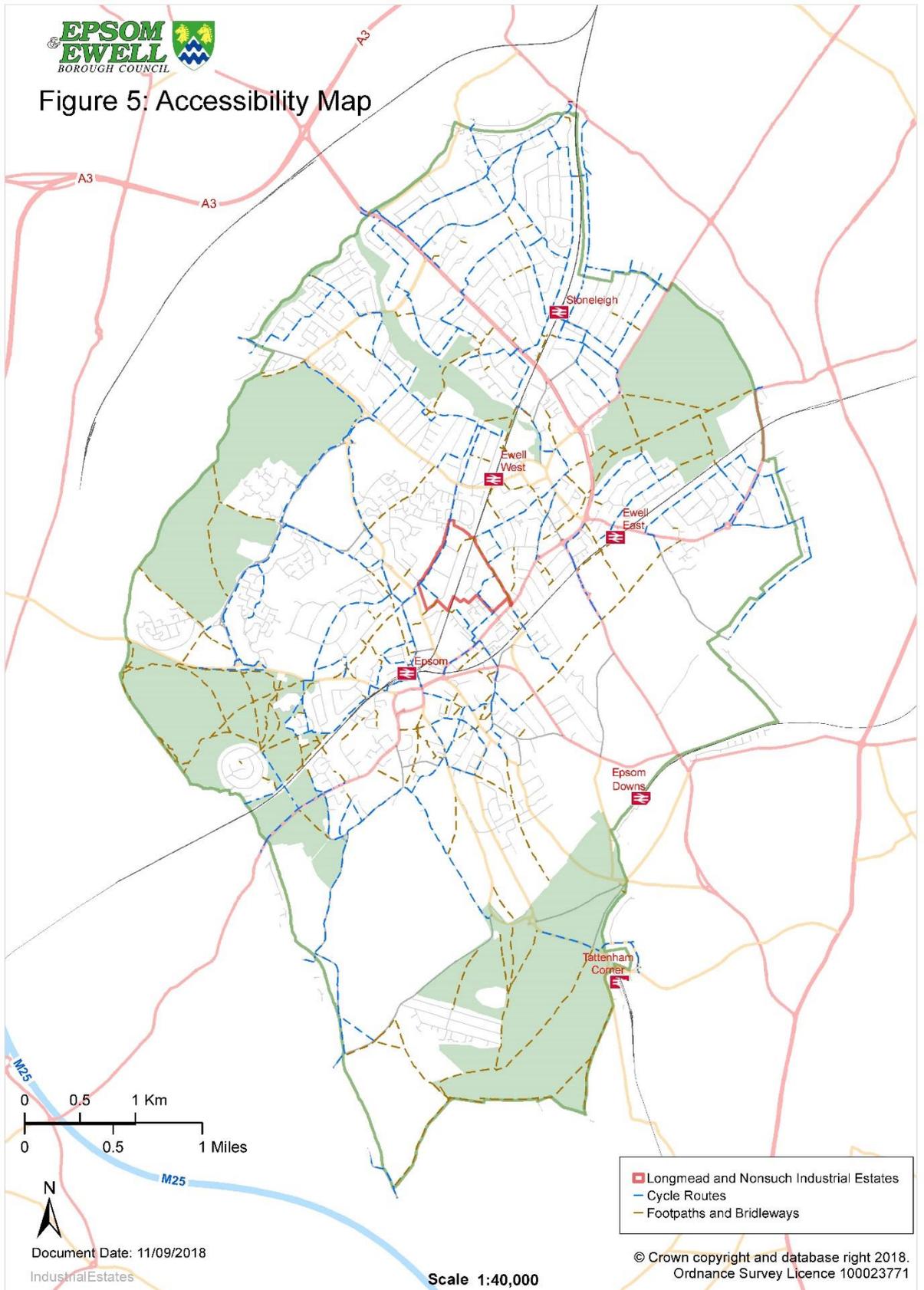
2.4 Neighbouring Land Uses

- 2.4.1 The study area is mainly surrounded by relatively low density residential accommodation, which is comprised mostly of houses with some flats. Surrounding development densities range from 20 dwellings per ha to about 50 dwellings per ha.
- 2.4.2 Two Secondary Schools, a residential care home and open space uses are adjacent to the site. The Ewell Village Conservation Area lays to the north east of the site but has no directly adjoining boundaries (it is separated by the railway line). Figure 4 shows the breakdown of the adjacent land uses and approximate housing densities.



2.5 Accessibility

- 2.5.2 The Industrial Estates remain popular with businesses due to their easy access to the M25, A3 and airports. The train services and frequency of these to Waterloo, London Bridge and Victoria also make the site an easily accessible location.
- 2.5.3 The Longmead Industrial Estate has good access for Heavy Goods Vehicles, particularly in relation the A3 and M25 via the Malden Rushett junction. However, road access from the north and south (via the A24) is constrained by a combination of factors – namely, the road networks through Epsom Town Centre and Ewell Village, and the limited number of bridges/ tunnels crossing the Waterloo railway line. This is an established issue that has generated a variety of proposed solutions, including a major highway improvement ‘the Kiln Lane Link’, the delivery of which is unlikely.
- 2.5.4 There is further stress to the road network from on-street parking by both employees and customers. Although the study area is well served by pedestrian cycle networks, the nature of the commercial activity has resulted in a culture where most vehicle journeys are car borne – as evidenced by the preponderance of on-street parking across the whole study area. The networks linking the site are shown under Figure 5.



2.6 Potential Land Use Constraints

- 2.6.1 The desktop review and subsequent site visits have identified two potential land use constraints that are fixed or could result in antisocial/ bad-neighbour impacts to any future scenarios involving new residential accommodation. These are the Thames Water Storage Storm Tanks facility and the Community Recycling Centre and waste transfer station.
- 2.6.2 The Thames Water Hogsmill (Epsom & Ewell) Storm Tanks are located in the north east of the Longmead Industrial Estate. The tanks function as temporary storage during heavy rainfall, for untreated sewage as it travels through the network of pipes towards the Hogsmill Sewage Treatment Works. Although as yet unconfirmed by Thames Water, the Study assumes a worse-case position that this is not a use that can easily be relocated. The Study makes this assumption because of - its location adjacent to the Green Lanes Stream for occasional discharge purposes. In summary, the facility is already in an ideal location and relocation could be prohibitive in cost.



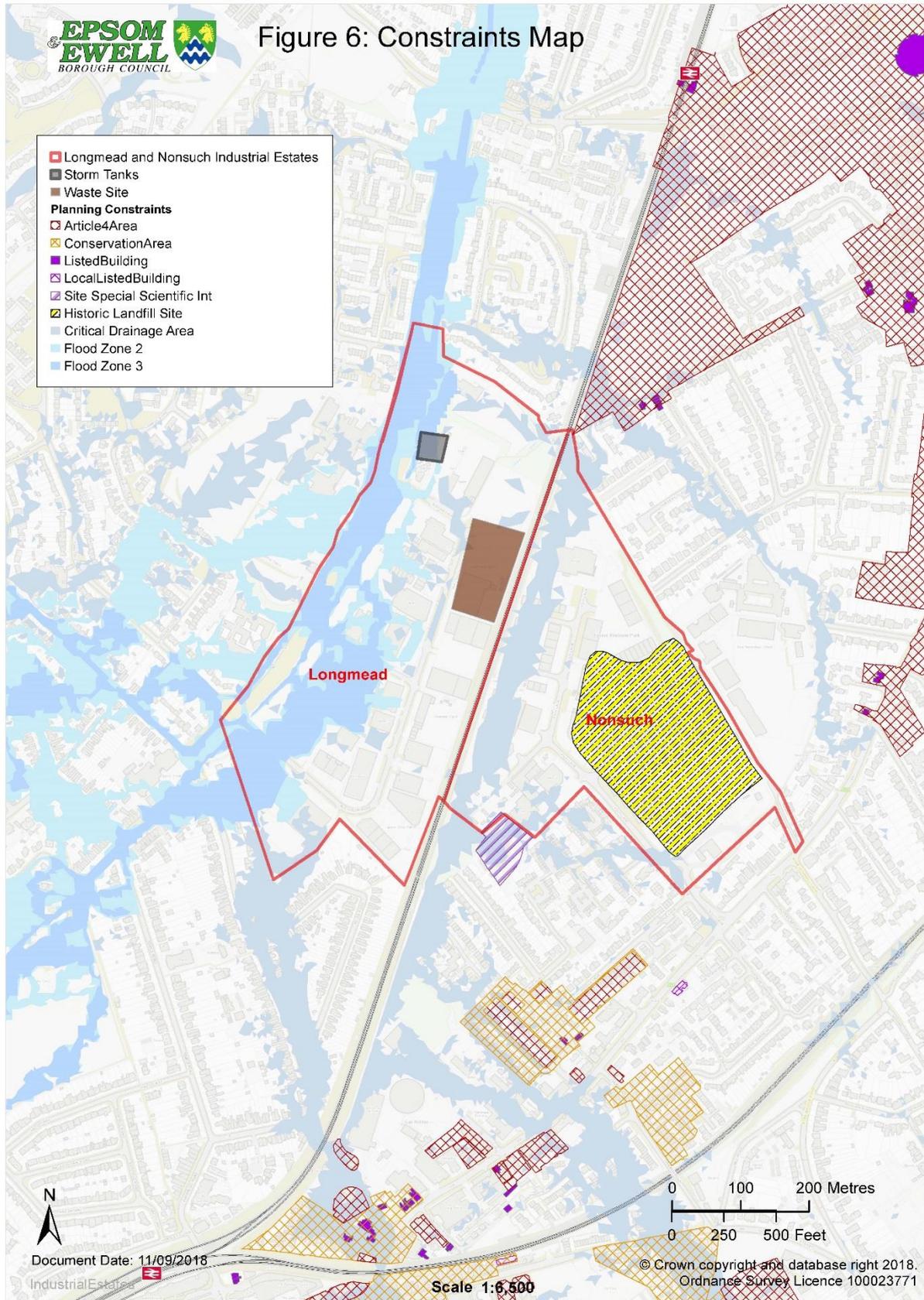
Thames Water sewage storm tanks site

- 2.6.3 A combined Community Recycling Centre (CRC) and waste transfer station are located within the Longmead Industrial Estate. A number of years ago this site was considered as being operationally no longer fit for purpose and a larger alternative site was being sought for waste uses. However, changes to the layout of the existing site, a reduction in the demand by the public for the CRC facility (due to changes in doorstep waste collections) along with a lack of finance and a suitable alternative site have rendered the proposed relocation untenable. Any future redevelopment of the two Industrial Estates will therefore need to consider this use, the difficulties in relocating it and the potential implications it will have as a 'bad neighbour' alongside residential uses.

- 2.6.4 The Study has identified other additional planning and development constraints. These are shown under Figure 6 (constraints map).
- 2.6.5 Much of the west of the site, along the boundary with Longmead road and the Green Lanes Stream is designated as Flood Zones 2 or 3. Some of the flood zone extends through Felstead Road and the Longmead Business Centre. National planning policy requires the application of a sequential approach to site allocation- seeking development sites within areas of lowest flood risk in the first instance (Flood Zone 1). In simple terms this requires that future residential sites are identified within areas of lowest flood risk in the initial instance. Only if it can be demonstrated that there are no suitable sites within these areas (of low risk) should alternative sites (possibly in areas of higher risk) be contemplated.



Open space adjacent to the Green Lanes stream



Summary of Findings

- The commercial activities across the two Industrial Estates are visibly thriving.
- There are very few vacant units and a wide range of successful occupants.
- The commercial representation across the Industrial Estates is diverse; being comprised of employers operating at local, national and international scale. This is a strong indicator of the positive vitality and viability of both Estates as commercial locations.
- Many of the buildings have clearly had recent investment to improve their facilities. This indicates that many current occupiers intend to remain on the site for the foreseeable future.
- There are some areas of the site that are in single ownership which could mean that they are more likely to come forward for redevelopment in the shorter term.
- Landownership, particularly in terms of the legal status of long leases (and their associated break clauses) may not provide a panacea for the rapid comprehensive redevelopment of the Industrial Estates.
- The Industrial Estates are well located in relation to the highway network with a good level of accessibility to the A3 and M25 via the Malden Rushett junction. However, highway access from the north and south (from A24) is relatively constrained; especially for heavy goods vehicles. Nevertheless, there is no evidence that latter constraint has not adversely impacted upon the demand for commercial accommodation within either Industrial Estate.
- There is stress on the road network from on-site parking
- Two 'bad neighbour' uses have been identified. These are the Sewage storm tanks and the waste facility. The relocation of these uses is problematic as both uses are already in established sustainable locations.

3. Assessment of Findings and Development of Site Options

3.1.2 The above assessment has highlighted a number of issues, which will inform and influence any potential redevelopment (for new residential accommodation) on the two Industrial Estates. The Study applies the outputs from the assessment to guide the future development options in terms of what could be potentially achieved on the sites. These findings and their implications for the development of potential future options for the industrial sites are considered below.

3.2 *The Quantum of Retained Commercial Floorspace*

3.2.2 It is clear from the evidence that both the Longmead and Nonsuch Estates are performing well, as indicated by the low vacancy rates (only 3 vacant units at the time of the site visit) and recent investment in a number of the units across the site. Other evidence also supports this position. The Economic Growth Survey (2014), carried out on behalf of Surrey County Council, also supports this through testimonial evidence from a number of the businesses, who expressed that the Industrial Estates provide them with a successful trading area, and as a consequence they state that they have no plans to relocate. On the basis of this evidence the two Industrial Estates still appear to fulfil their roles as the Borough's primary location for industrial / warehouse/ storage uses.

3.2.3 However, it is noteworthy that over time the industrial focus of the two Estates appears to have become diluted. This is demonstrated through the significant number of sui-generis uses currently trading across the two Estates. Annex 1, shows a number of these which have been permitted. Most of the Sui-Generis uses on the sites fall into two categories, being either uses which are a mix of B2 (general industrial) or B8 (storage and distribution) but have a greater retail focus (such as trade counters), or are car related uses such as showrooms. The latter are highlighted as becoming particularly visible and numerous across the sites. It is important to emphasise that these sui-generis uses retain a strong employment focus and make a valuable contribution to the economic vitality and viability of the Borough. It is also noteworthy that planning permission would be required for a change of use, even to another sui-generis use. However, these new Sui Generis uses have effectively replaced the B2 uses that had previously traded from the two Estates.



Mercedes Benz located on the Nonsuch Industrial Estate (Sui Generis)

3.2.4 While the uses on the industrial sites have diversified over time, it is clear that there is still strong market demand for commercial accommodation across both Industrial Estates. On that basis it is reasonable to conclude that if the commercial floorspace offer on the two Industrial Estates were to be significantly scaled down in the future, both commercial activity and employment opportunities would be reduced. This is likely to harm the economic vitality of the Borough. Such harm could be minimised through relocating the industrial uses elsewhere within the Borough. However, given the general lack of development sites and the industrial/'bad neighbour' nature of some of the uses, this would be extremely challenging. It is reasonable to conclude that should such a scenario come forward, the majority of the commercial uses would be forced to relocate outside of the Borough, which would be detrimental to the Borough's economic sustainability.

3.2.5 Consequently, it is recommended that a proportion of commercial floorspace is retained in all of the future redevelopment scenarios under consideration by the Study. Such scenarios could range from retaining the vast majority of the existing commercial floorspace, through to a more intensively used but smaller amount of commercial floorspace, which reflects the needs of the users. Such space would also need to be flexible, being able to adapt to changing business needs in the future.

3.2.6 It is noteworthy that some forms of development, involving changes of use do not require planning permission and will come forward under the 'permitted development' regime. This includes a change of use from B2 or B8 to B1 (business) uses up to a scale of 500m². It also includes temporary permitted development rights in respect of change of use of B8 to C3 (residential) uses under 500m² in scale, subject to prior approval. In respect of the latter the prior approval date must be before 10 June 2019 and the development must be completed within three years. To date there have been no such

applications that we are aware of on the Industrial Estates, perhaps being another indication of the performance of the Estates.

3.3 *Development Viability*

3.3.2 Evidence shows that there is investor demand for commercial employment sites within industrial employment areas like the Longmead and Nonsuch estates. In contrast, investment in other commercial sectors such as the office market, has fallen in recent years, while investment in industrial estates has remained buoyant, driven by occupier demand.

3.3.3 It is generally understood that the changing national retail market has resulted in more retailers wanting to locate in industrial estates, which may better meet their business needs (such as providing greater space, the ability to store/display a larger range of goods and customer vehicle access). This is evidenced on the Estates through the high occupancy rates and the increase in the number of trade counters operating from the site in recent years. In the long term should employment uses remain on site, investor and occupier demand is likely to result in the natural intensification of the employment uses on the sites without local authority intervention.

3.3.4 The Industrial Estates are therefore likely to have a high existing use value in property valuation terms. This could significantly affect the viability of any redevelopment. In simple terms, a high existing use value makes it unlikely that the use will change (for example to a new residential use). This is because the existing use is already sufficiently valuable to its landowner and a change of use is unlikely to result in an uplift in value.

3.3.5 To counter this any redevelopment would need generate a considerable increase in value. This could equate to new developments being built at a far greater density with taller buildings. It is recommended that this be reflected in the scenarios tested through the Study. However, building at a higher density could negatively impact on the surrounding fairly low density residential areas. This is a further matter that would need to be addressed through the scenario testing.

3.3.6 Finally, it is highlighted that should development viability be marginal, it may not be possible to meet the full range of usual policy requirements. For example meeting the affordable housing requirement in full, or achieving the desired standards for open space provision. Consequently the local planning authority would need to make a balanced judgement as to what is considered acceptable. It is likely that bespoke viability studies would be required to ensure policy requirements are maximised should any of the scenarios considered by the Study be investigated further.

3.4 *Densities, Residential Mix and Space Standards*

3.4.2 As both of the Industrial Estates border existing residential uses, the principle of introducing new residential uses onto the Industrial Estates may be considered acceptable in respect of the impact on adjoining uses. Being a

highly accessible location, close to public transport opportunities/local conveniences, higher density residential uses may be considered to be more appropriate. The application of higher densities could also have a positive impact on the viability of any proposed scheme.

- 3.4.3 It is recommended that the scenarios also consider the mix of residential units which could be accommodated. For example, in a scenario where only a small proportion of the site is released for residential use, smaller one or two bed apartments would be more appropriate. However, alternative scenarios that release a greater proportion for residential use could accommodate a greater mix of differently sized residential units with a proportion of family homes; although these may not be in the traditional format but more apartment style. This would reflect the demand for different types of units as set out in the Kingston & North East Surrey Strategic Housing Market Assessment (SHMA). However, viability may be a significant influence on the ultimate mix of units in any scheme.
- 3.4.4 In order to meet local housing needs, the scenarios must take account of the need for new affordable homes as this is a considerable area of need highlighted in the SHMA. The inclusion of affordable homes may also help make the loss of any commercial floorspace more palatable, although this will be subject to numerous other considerations.
- 3.4.5 Securing new affordable housing provision will inevitably be subject to development viability. It is anticipated that this could be a significant issue. Consequently, it is recommended that all relevant parties explore all reasonable opportunities for external funding to maximise the provision of affordable homes. For example the government's recent announcement (September 2018) of a £2 billion fund to increase the supply of homes for social rent highlights that such opportunities are available.
- 3.4.6 To ensure the wellbeing of future residents and the long-term sustainability of any potential residential development, national space standards should be met. This is in accordance with current Local Plan policy. The application of this policy has proven successful and does not appear to affect the delivery of new housing. Securing the national space standards (as a minimum) is considered a key component of sustainable development and as such this requirement is considered non-negotiable.

3.5 *Building Height*

- 3.5.2 In light of the revised NPPF (July 2018) and the shortage of available sources of housing land supply within the Borough, the local planning authority has stated that it is acutely aware of the need to optimise the use of available development land. Indeed [a recent report](#) to the Borough Council's Licensing & Planning Policy Committee (May 2018) highlighted this issue. It is noteworthy that the local planning authority has acknowledged that this approach is likely to result in some sites being developed at higher densities with taller buildings than current adopted policy would allow (Development Management Policies DM11 and DM13 respectively).

- 3.5.3 In terms of possible redevelopment scenarios, it is considered that taller buildings are likely to be required to some degree to assist with viability and to deliver the scale of new housing that would help justify the loss of commercial floorspace. The number and specific location of any taller buildings could vary depending on the amount of residential uses each scenario was seeking to deliver. It is also recognised that unit build costs increase with the height of buildings, so there may be a viability 'limit' as to how tall buildings could be.
- 3.5.4 Retro fitting higher density development within an existing low density suburban setting is challenging. It is suggested that taller buildings would be more suitable towards the centre of the sites. This would enable a graduation of building heights towards the residential areas which are mostly two storey. A range of building heights can also help to moderate the impact of taller buildings.

3.6 *Open Space Provision*

- 3.6.2 By their very nature the Industrial Estates contain little open space. However, there is an area of open space to the north of the site, which provides some separation between the Longmead industrial site and the adjacent residential area. Additionally, a strip of open space runs along the west of the Longmead industrial site which acts as a buffer to the Green Lanes stream and is mostly designated as flood zones 2 and 3.
- 3.6.3 Introducing residential uses onto the Estates, particularly those at a higher density will require additional open space provision. The greater the amount of residential uses, the greater the amount of open space that is likely to be required to serve the development. This additional provision may take the form of private communal open space or public open space; both making a positive visual contribution to the public realm and townscape.
- 3.6.4 It is unlikely that any of the possible scenarios would secure new houses with private gardens as this would reduce the number of units which could be accommodated, and negatively affect development viability. Nevertheless, private open spaces such as balconies should be incorporated into any apartment style buildings. Open space could also be utilised to provide a level of separation between the residential and commercial uses, particularly those of an 'industrial/bad neighbour' nature.

3.7 *Light and Building Separation*

- 3.7.2 As mentioned above, there needs to be some consideration as to how the residential and commercial uses on site will be separated. In particular, taller buildings will require greater building separation to ensure suitable living / working conditions for future occupants. This could be achieved through the utilisation of open spaces or a graduation in building heights. The NPPF suggests that local authorities take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit

making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

3.8 Transport Infrastructure

- 3.8.2 As set out in the overview of the study area, the two Industrial Estates benefit from a good level of accessibility. They are relatively well connected to the highway network and within easy reach of both Epsom and Ewell West Stations. However, the railway line, which transects the site, can function as a constraint to vehicle movements; particularly in respect of larger commercial vehicles. This could be addressed as part of any redevelopment. Equally, whilst major highway schemes (such as the Kiln Lane link) are unlikely to be viable or deliverable, improvements could be made to the existing pedestrian and cycle access.
- 3.8.3 Vehicle parking is also a major consideration. Given the sustainable location and accessibility of the two Industrial Estates, it is suggested that future redevelopment scenarios could consider a flexible application of residential parking standards. As car use and ownership changes over time, it is conceivable that future scenarios could explore the potential for genuinely car-free residential developments. However, in spite of these possibilities many of the remaining commercial uses will continue to require on-site parking provision and space for deliveries by heavy goods vehicles. Future redevelopment scenarios must incorporate such provision if such mix-use redevelopment proposal are to be successful.
- 3.8.4 The redevelopment scenarios must incorporate provision for sustainable transport improvements, such as safe cycle (including secure cycle parking) and pedestrian routes within the development. Such improvements will need to be separated from commercial road traffic, such as HGVs, which will also need to access the site.

3.9 Availability

- 3.9.2 During 2014 Surrey County Council, in conjunction with the Borough Council commissioned primary research to be undertaken by the external consultants Economic Growth Management. The purpose of their study was to establish an initial evidence base to support a revised economic case in support of the Kiln Lane Link Road major highway improvement scheme. This involved interviewing a significant number of the landowners, freeholders and major leaseholders on the Longmead and Nonsuch Industrial Estates to establish their aspirations for the future. They were asked whether there were any known plans for relocation or expansion of the organisation/ business at the site. Although this information is no longer fully representative of the site (as some of the parties involved no longer operate from the Industrial Estates), it does provide valuable intelligence in relation to market demand for commercial space across the two Industrial Estates.
- 3.9.3 It is notable that none of the organisations interviewed were seeking to relocate or comprehensively redevelop (beyond that required for their own

commercial purposes) but some were considering expansion. More detailed responses can be found under Appendix 5.

- 3.9.4 This provides strong evidence that the site is functioning well as an employment site and that some of the site owners are planning to invest further to maintain the site in commercial use. There is further evidence to support this position; namely in the form of investment that has occurred on some sites over the past couple of years, such as the SGN and Ford Transit sites.
- 3.9.5 It is noted that the Local Planning Authority has made contact with a number of commercial operators who have recently implemented mixed-use schemes that may provide a template for some of the redevelopment scenarios considered by the Study. Typically, these mixed-use schemes are comprised of industrial, manufacturing or bulk storage uses on the ground/ lower floors, with high density accommodation on the upper floors. In most of the examples that had been implemented, the buildings were in excess of ten storeys in height, a requirement largely necessitated by development viability.
- 3.9.6 It is noteworthy that in most cases the upper floor accommodation was not conventional market or affordable housing but specialised accommodation (frequently student housing). This suggests that the housing market remains nervous and is not entirely comfortable with developments that mix housing with industrial or manufacturing activities. As already noted there is a propensity for the latter activities to be perceived as bad neighbours. This suggests that house builders and buyers may not be ready for this type of housing.
- 3.9.7 Contact with the development industry also revealed other key considerations. In event that a willing commercial operator comes forward with a proposal to develop their operational site they will require a new site, in close locality to their existing site, onto which they can temporarily relocate. Within the context of this process, an operator could require that temporary site for at least two years, whilst their permanent home is transformed into its new mixed-use form. This requirement demands comparable/ suitable sites to be available in the locality. Businesses cannot suspend their commercial activities – they need to remain seamlessly operational.
- 3.9.8 The Study has already noted that the two Industrial Estates have low site vacancy rates. It is tempting to assume that a landowner could redevelop an unoccupied site speculatively, offering a generic commercial site at the ground and lower floors. However, this type of solution may only attract a limited customer base as those commercial operators seeking out mixed-use opportunities will want a bespoke property that meets their precise needs. On that basis, the inability to meet these key requirements will serve as a significant constraint to mixed-use developments being implemented during the forthcoming Local Plan period.



SGN Headquarters on the Longmead Industrial Estate

3.10 Summary of recommendations for development scenarios

- A quantum of commercial floorspace should be retained in all of the development scenarios. Losing a large amount of floorspace could have a significant negative effect on the economic vitality of the Borough. Where possible, efforts should be made to intensify the commercial uses taking into account the needs of future users.
- Viability will be a key consideration. With the likely high existing use value of the commercial uses the viability of residential development will be under pressure.
- As a result, residential development will need to be of a higher density, with taller buildings. However, to ensure the wellbeing of future residents, the national space standards should be adhered to.
- Where possible, a mix of dwelling sizes should be incorporated. While it is recognised that viability constraints may result in a greater proportion of smaller units, there should be a proportion of family sized homes to meet the needs identified in the Strategic Housing Market Assessment.
- Affordable homes should be included, although viability issues may make this challenging.
- Open space will need to be provided to serve the residential units, improve the public realm and, where possible, provide some degree of separation from the commercial uses.
- Some level of parking for private vehicles should be provided, although this should be minimal due to the sustainable location of the sites.

4. Potential Redevelopment Scenarios

4.1 Scenario 1 - Retention of the majority of the site as Employment Land



4.1.1 This scenario envisages the retention of the majority of the site as employment land, broadly in accordance with its current uses. Opportunities

for new residential uses may arise on an ad-hoc basis and the commercial uses may naturally intensify over the years.

4.2 Key Components to this Approach

- Possible redevelopment of a series of smaller sites for commercial uses at ground floor with residential uses above
- Residential uses are likely to be comprised of smaller one and two bed units
- Likely to deliver lower housing yields, possibly 10 to 15 units per 'site'
- Overall residential yield of approximately 100 to 150 units
- Very limited affordable housing provision as many of the sites are likely to be under the national policy threshold of 10 units
- No direct intervention over the intensification of commercial uses

4.3 SWOT analysis Scenario 1

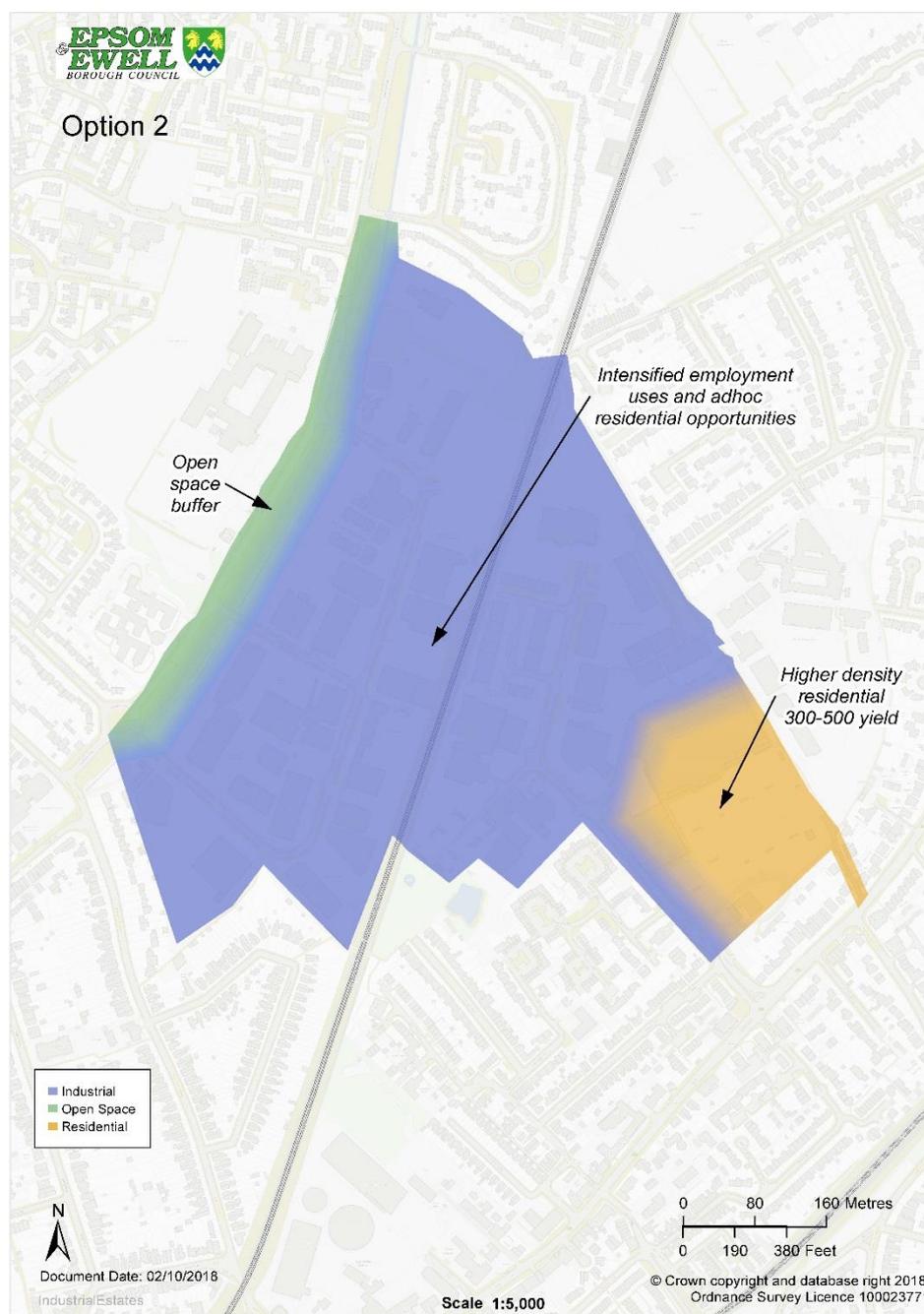
STRENGTHS	WEEKNESSES	OPPORTUNTIES	THREATS
Retains a large proportion of successfully performing commercial floorspace in a highly accessible location.	Lack of intervention may delay the intensification of the commercial uses on site (site may still not meet its full potential).	Retains the long-term opportunity for natural intensification	Limited residential development does little to help meet the Borough's significant housing need.
Commercial land continues to be available to meet market demand.	Housing delivery is severely limited – likely to be on smaller sites and through an on an ad hoc basis.	Council could pre-actively work with land owners to intensify specific sites in individual ownership.	Limited amount of affordable housing (due to less housing and smaller piecemeal development).
Leaves the market to deliver residential units where viable.	Piecemeal residential development within an existing industrial estate is unlikely to result in comprehensive redevelopment that includes the desired high quality living conditions. This could include developments lacking in amenity space/ parking/ landscape due to limited space.	Retains the potential for the Borough to support the changing retail demand for more space/ access/ trade counter style shopping that industrial sites can offer and traditional High Streets are struggling to meet.	Leaving delivery to the market has no certainty.
Market forces are likely to lead to the intensification of the commercial site over time.	Less opportunity for a mix of size and type of units desired- more likely to be smaller units.		Residential development coming through the permitted development route may result in sub-standard size units/ amenity/ infrastructure (as is happening with some office buildings).
The provision of adequate floorspace helps to maintain the economic viability of the Borough.	This option does not optimise the residential or commercial potential of the site due to the lack of masterplan.		
Retains suitable sites for otherwise difficult to locate 'bad neighbour' uses.			
The impact on surrounding residential areas in minimal (no wholesale development).			

Reduced risk of complex and costly site land assembly process.	Residents would be living within a commercial area that would not necessarily be conducive of high quality living.		
A more deliverable scenario.			

4.4 Scenario 1 Conclusion

- 4.4.1 This scenario could be implemented with minimum intervention from the local planning authority. The only significant action that would be necessary for this happen would be the revocation or softening of the Local Plan’s employment policies.
- 4.4.2 The scenario would result in a significant quantum of employment land being maintained which would help meet the needs of the economy and safeguard the economic vitality of the Borough. Given that the Estates are currently well performing it is likely that this will continue into the foreseeable future. Allowing market forces to influence the Estates means they will continue to evolve, probably intensifying the land uses over time. This may happen at a slower rate and in a more ‘unplanned’ fashion without intervention but it would be in response to natural market forces.
- 4.4.3 However, the Study concludes that an approach that allows market forces to be the sole driver for delivering new housing on the Estates would result in a very limited number of housing units being brought forward. This is because of the likely high existing (commercial) The high existing commercial land values do not incentivise changes in uses – as such changes would provide marginal uplift in land value. This scenario is therefore unlikely to make a meaningful contribution to housing land supply. Additionally, the introduction of residential uses in an unplanned way could result in the gradual erosion of the Estate’s commercial nature. This could restrict the type of commercial operations to those that could operate alongside residential uses.
- 4.4.4 The Study concludes that this approach could result in the piecemeal loss of viable, occupied and fit-for-purpose employment floorspace. This position is supported by evidence of what happened to the Borough’s office floorspace portfolio following the changes to the permitted development regime. Those changes generated a rapid loss of viable, occupied and Grade A office stock across Epsom Town Centre, which triggered the need for the urgent serving of Article 4 Directions in order to manage the potential for such change.

4.5 Scenario 2 – Redevelopment of a proportion of the area as high density residential accommodation



4.5.1 This scenario envisages the redevelopment of a proportion of the site that is within one landownership for high density residential use. The rest of the site would be retained as employment land where the intensification of commercial uses would be encouraged and residential opportunities could arise on an ad-hoc basis.

4.6 Key Components to this Approach

- Larger site for residential redevelopment, possibly around four or five hectares.

- Density would need to respect surrounding development patterns (for example lower densities adjacent to existing residential uses graduating to higher densities in the centre of the site) .
- This could deliver a range of housing with denser buildings towards the centre of the site, perhaps up to 6 storeys (at approximately 300 dph)
- Possible overall average density across site could range from 70 units/ha to 120 units/ha (NB densities will vary across site)
- Possible yield could range from 334-574 units
- Affordable housing yield at 40% could range between 133 units to 230 units
- Limited car parking due to site’s proximity to town centre
- Provide some degree of separation from the industrial uses to the north
- Opportunities for high quality landscaping and public realm

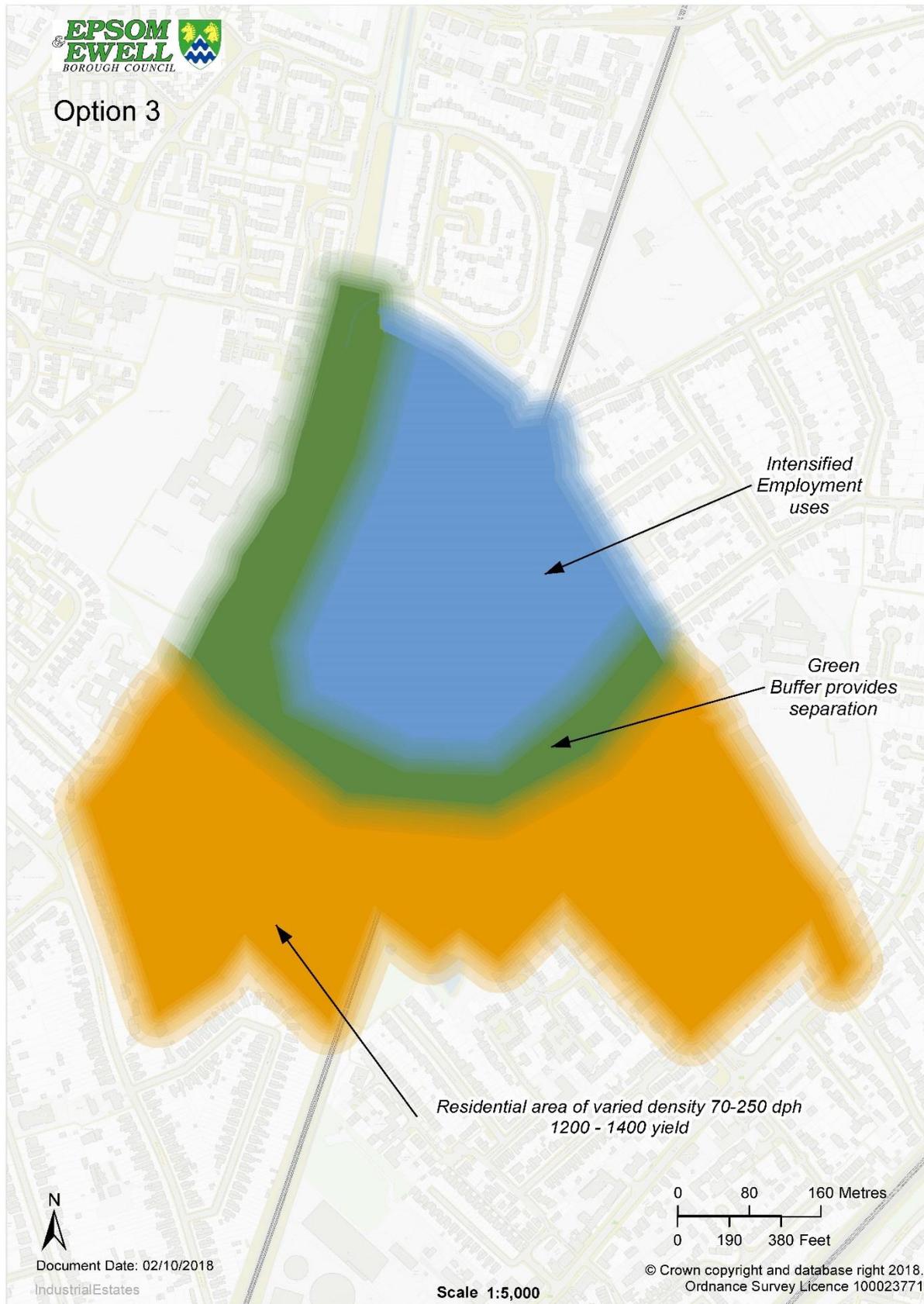
4.7 SWOT analysis of Option/ Scenario 2

STRENGTHS	WEAKNESSES	OPPORTUNITIES	THREATS
<p>Land in a single ownership could potentially make the process simpler.</p> <p>A masterplanning approach provides a more comprehensive redevelopment of the site to include infrastructure/ amenity/ open space etc.</p> <p>Retains the majority of successfully performing commercial floorspace in a highly accessible location.</p> <p>Continues to provide for high market demand for commercial units on part of the site.</p> <p>Leaves the market to deliver residential units where viable in the commercial part of the site.</p> <p>Helps to maintain the economic viability of the Borough through providing adequate floorspace- which has been shown to be in high demand.</p> <p>Retains suitable sites for otherwise difficult to locate ‘bad neighbour’ uses.</p>	<p>Losing a proportion of currently well performing commercial floorspace. This means the loss of some economic activity in the Borough and employment opportunities.</p> <p>Would require intervention to deliver this scenario in the short term. This would be at a high cost and with significant risk.</p> <p>Limited potential for taller/ higher density buildings compared to larger scale redevelopment.</p> <p>Limited potential to provide open space provision.</p> <p>Limited housing numbers in comparison to scenario 3.</p> <p>Less opportunity for a mix of size and type of units desired- more likely to be smaller units.</p>	<p>Potentially easier to deliver due to single land ownership.</p> <p>Opportunity for comprehensive masterplan allowing for planning for amenity space/ access/ open space/ landscaping and higher standards.</p> <p>More opportunity for affordable housing delivery</p> <p>Higher density could provide a range of units types.</p>	<p>Potentially harmful to the economic vitality of the Borough through the loss of important and currently well-performing employment floorspace that is unlikely to be replaced.</p> <p>A moderate level of housing delivery would still result in unmet housing need. Other options to meet this need would need to be considered (such as Green Belt sites).</p>

4.8 Scenario 2 Conclusion

- 4.8.1 The Study concludes that this scenario is more likely to be implemented in the long term; beyond the forthcoming Local Plan period. There is currently no evidence that suggests that any of the major landownerships, across the two Industrial Estates are exploring opportunities to dispose of their assets or relocate. On the basis of the available evidence, this scenario would require a significant change in the commercial land market for it to be delivered. For example, the Study envisages that this could occur if businesses transferred their operations to on-line/ warehouse style shopping format and as a consequence trade counters were no longer viable. Equally a similar shift could be generated by significant changes within the motor industry, particularly in relation to motor car ownership and usage. It is possible that this could happen during the life of the new Local Plan but there is great uncertainty as to how such changes in these industries would impact on their land use requirements. For example it is equally possible that a move away from private car ownership (to an app-based culture) would still require a significant land-take; for the storage and maintenance of an app-provided fleet.
- 4.8.2 Nevertheless, if the Borough Council were committed to delivering this scenario it could still be possible to do so. However, the Study concludes that the delivery of this scenario during the new Local Plan period is likely to require significant intervention and investment by the Borough Council and its partners. This would not be without risk.
- 4.8.3 The piecemeal loss of employment land that could still happen under this option across the two Industrial Estates would, in the absence of any alternative provision elsewhere in the Borough, have an adverse impact upon the local economy.

4.9 Scenario 3 – Comprehensive Transformation



4.9.1 This scenario envisages the comprehensive redevelopment and transformation of both Industrial Estates in their entirety. This scenario would be comprised of high density residential and intensified employment uses provided in the most appropriate locations across the sites.

4.10 Key Components to this Approach

- A masterplan approach for the comprehensive redevelopment of the Estates
- Density would need to respect surrounding development patterns (for example lower densities adjacent to existing residential uses graduating to higher densities in the centre of the site).
- This could deliver a range of housing with greater densities towards the centre of the site, perhaps up to 8 storeys (at approximately 400 dph)
- Possible overall average density across site could range from 70 units/ha to 250 units/ha (NB densities will vary across the site)
- Possible yield could range from 1260 units to 2700 units
- Affordable housing yield at 40% could range between 500 units to 1080 units
- Adequate open space would need to be provided on site and could also provide some degree of separation from the industrial uses
- Limited car parking provision due to site’s sustainable location
- Wholesale redevelopment could provide opportunities for high quality landscaping and public realm
- Opportunities for improved pedestrian and cycle access across the site.

4.11 SWOT analysis of Option/ Scenario

STRENGTHS	WEAKNESSES	OPPORTUNITIES	THREATS
<p>Delivery of high quality commercial units in line with market demand</p> <p>Would deliver a significant number of housing units</p> <p>A masterplanning approach provides a more comprehensive redevelopment of the site to include infrastructure/ amenity/ open space etc.</p>	<p>There are many parts of the site that have already been subject to significant investment making them unlikely to be viable or desirable to redevelop</p> <p>Losing a large proportion of currently well performing commercial floorspace would be likely to have a significant impact on the Borough economic activity levels and employment opportunities.</p> <p>High land values making such an option costly to deliver could result in desirables such as affordable housing or space</p>	<p>Proactively redevelop existing commercial to a higher intensity to meet modern business needs.</p> <p>Opportunity for comprehensive masterplan allowing for planning for amenity space/ access/ open space/ landscaping and higher standards.</p> <p>Opportunity for separation between industrial and residential resulting</p>	<p>Potentially serious harm to the economic vitality of the Borough by losing important and currently well- performing employment floorspace that can never be replaced.</p> <p>Delivery would involve intervention and significant costs/ risk.</p> <p>Land hungry commercial uses would be pushed out potentially against the market wishes.</p> <p>Industrial/bad neighbour commercial uses are likely to find it difficult to</p>

	<p>standards being compromised.</p> <p>Challenging to deliver due to complicated mix of landowners/ freeholders/ leaseholders</p> <p>Would require significant intervention to deliver. This would likely be at high cost and come with risks on public sector money.</p>	<p>in a better standard of living for new residents.</p> <p>More opportunity for affordable housing delivery</p> <p>Higher density could provide a range of units and taller buildings could be graduated.</p>	<p>relocate to an alternative site.</p> <p>There is still likely to be a shortfall in meeting our housing need.</p>
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4.12 Scenario 3 Conclusion

4.12.1 This scenario results in a fully comprehensive redevelopment of the site, including infrastructure, amenity space and other master planning components. However this scenario could only be implemented in the long term; which is likely to be beyond the forthcoming Local Plan period as there is no evidence that suggests that any of the major or smaller landownerships, across the two Industrial Estates are exploring opportunities to dispose of their assets or relocate. The evidence shows that all sites are performing well as employment sites and that the economic activity is thriving. As with scenario 2 this scenario would require a significant change in the commercial land market for the occupiers/ owners to actively seek to vacate the area. Although commercial uses would be intensified on site it is highly unlikely that all commercial uses could be re-provided. This would have a negative impact on the local economy as these businesses are unlikely to find any other suitable site in the borough and to move elsewhere. In land availability terms, for any operational site to redevelop their site they will require a new temporary site in close locality to the existing site to allow them to remain operational.

4.12.2 If the Borough Council were committed to delivering this scenario during the plan period it would require significant intervention, investment and complicated land assembly which would likely come at a high cost to the public sector in the current market. This significantly reduces the deliverability of this scenario.

5. Conclusions and Recommendations

- 5.1.1 The main purpose of this study is to evaluate the potential of the industrial estates for housing. The three emerging scenarios could provide a range of housing from approximately 100 units up to 2,700 units, while retaining varying degrees of commercial floorspace.
- 5.1.2 However, the Study concludes that there is no certainty to any of these approaches. No evidence has been found to indicate that any of the sites across both Industrial Estates are genuinely available for redevelopment for non-commercial uses. The evidence demonstrates that there are very few vacant units across both Industrial Estates; there is a diverse range of well-established commercial activities; and that there is strong evidence of recent and on-going investment in the existing commercial uses and operations. The evidence demonstrates that both Industrial Estates are economically vibrant and viable as commercial/ employment locations. They make a very positive contribution towards the Boroughs economic vitality and viability that would be difficult to replace or replicate elsewhere during the Local Plan period.
- 5.1.3 It is particularly noteworthy that the National Planning Policy Framework 2018 Paragraph 121 states that employment land should only be used for housing if it would not undermine key economic sites. On the basis of the evidence the Study concludes that the possible redevelopment of the two industrial estates for a mix of commercial and residential uses would undermine the commercial offer of the Estates as employment sites. This would have an adverse impact on the economy of the Borough. Given the scale of demand for housing land across South West London and North East Surrey the Study concludes that it will be difficult to identify viable alternative sites for any displaced employment uses. This would have a profound long term impact upon the local economy.
- 5.1.4 The Study identifies a number of significant constraints to the prospect of mixed-use development coming forward on this site during the Local Plan period. These constraints include practical operational matters, such as lack of land for temporary relocation; development viability constraints, namely that existing uses are very successful, so accordingly land prices and value remain very high; and 'industrial/bad neighbour' uses, which suggest that satisfactory living conditions for future residential uses would not be met. The Study concludes that the necessary mitigation measures that would be required to respond to this matters, in order to introduce new housing development across both Estates, would be costly and problematic to put in place.
- 5.1.5 It is highlighted that the first scenario, comprised of modest ad-hoc residential development, would only deliver a small number of new homes. This scenario would result in piecemeal development for a relatively small housing yield. The potential housing yield from this scenario would have little impact on the Borough's identified housing need whilst having a negative impact on the overall economic vitality of the site.

- 5.1.6 This study concludes that the re-development of the Nonsuch and Longmead Industrial Estates is not a viable option for housing delivery within the new local plan period. There are currently no market drivers to suggest that there is any desire or ambition to comprehensively redevelop these two sites for mixed-use development. On that basis the Study concludes that the mixed-use redevelopment of the two Estates is currently not viable and unlikely to happen during the life of the new Local Plan.
- 5.1.7 Although a possible scenario involving aggressive intervention to realise a comprehensive mixed-use development may appear attractive, the Study concludes that under current market conditions this would prove an extremely costly exercise. The outcomes from such an intervention are uncertain. There is no evidence of demand from the local commercial markets for mixed-use employment typologies and as a consequence intervention (by the local planning authority) would be loaded with significant risk. More tellingly, the Study demonstrates that the overall scale of new housing that could be realised through such mixed-use development would not make significant inroads into the Borough's housing requirement. In conclusion, the Borough Council would still have to consider other sources of housing land supply to meet the bulk of the Borough's objectively assessed housing need.
- 5.1.8 Both Industrial Estates function well in terms of their existing commercial uses. Together they serve as the principle economic/ industrial hub for the Borough. Any loss of economic activity would seriously undermine the economic vitality and viability of the Borough. This consequential impact is a significant consideration to any proposals to identify either as housing allocation sites. Given the comparatively modest scale of new housing that could theoretically be delivered through the mixed-use redevelopment of the two Estates, the loss of the existing commercial and the consequential impact on the local economy is considered too high a price to pay.

Recommendations

- 5.1.9 The Study recommends that the emerging Local Plan continues to designate and safeguard the two Estates as strategic employment sites. As such, future site allocation policies should seek to optimise and intensify the employment and commercial activities across both sites. It is recommended that proposals for new purely non-commercial uses, including residential accommodation be actively discouraged as being inappropriate for the long term economic viability of the two Estates. Proposals that seek to introduce mixed-use development; possibly comprised of commercial uses at the lower levels and residential accommodation to the upper floors, should be considered on their individual merits. It is recommended that such proposals provide a full economic assessment of the impact of the new residential uses upon the long-term economic vitality and viability of the two industrial estates. At the very least these assessment should demonstrate a neutral long-term impact.
- 5.1.10 Given some of the significant land-use constraints present across the two Estates, the Study recommends that the mixed-use proposals must demonstrate that they can deliver appropriate mitigation measures, in addition to being policy compliant. The Study considers this a critical consideration. The redevelopment of the Estates as mixed-use sites should not be sought at any cost – to either the Borough’s economy, the provision of affordable housing, or the delivery of high quality building design.
- 5.1.11 In parallel with the above approach, the Study recommends that the new Local Plan actively encourages industrial/ employment sites located outside of the town centre and employment areas to relocate to these more suitable locations. This approach supports to intensification of these uses in these areas and further strengthens their role as strategic employment sites. This will help to release alternative and more appropriate land for housing. The Study considers that this approach will maintain the employment areas for industrial/ economic uses and free up essential land for high density housing development.
- 5.1.12 A Borough-wide Transformation Masterplan is currently being prepared. It will consider how the Borough will seek to optimise housing delivery through higher density, taller and well-designed buildings in the future. The Masterplan will need to assess potential policy approaches to the industrial sites that could be called upon if ad-hoc applications were to come forward in the future. This could also be used if the market was to change and the industrial/ employment floorspace become less economically strong and the sites became more viable as housing developments. The Study recommends that the Masterplan take full account of the evidence, conclusions and recommendations set out herewith.

Appendices

Annex

1. List of planning history
2. Marketing booklets
3. Spreadsheet of units and map
4. Sample of landowner aspirations 2014

Annex 1

Longmead and Nonsuch Industrial Estates- Sample of planning applications

08/01038/FUL

Allam Motors

Unit 12

Felstead Road

Change of use of front part of Unit 12 from B2 (General industrial) use to a motor car showroom (Sui generis use)

PERMITTED 01/09

13/00882/CLP

Unit 24 & 25

Nonsuch Industrial Estate

Certificate of Lawful Development for proposed B8 (Storage and Distribution) use with ancillary retail.

PERMITTED 12/13

13/00950/COU

Citilink

5 Roy Richmond Way

Change of Use from B8 (Storage or Distribution) to Motor Vehicle Showroom/Workshop (Sui Generis).

REFUSED (Insufficient detail on loss of employment land)

14/00384/FUL

The Pavilions

1 Weston Road

Demolition of office building (B1) and the construction of a new car servicing centre (B2) including ancillary office space (B1) and car showroom (sui generis) with ancillary infrastructure works and new landscaping.

PERMITTED 9/14

14/00995/COU

Unit 18

Nonsuch Industrial Estate

Change of use from B1(c) to B1c/B2/B8 Class of Use for installation of MOT test bay.

PERMITTED 12/14

15/00263/FUL

Longmead Industrial Estate

2 - 3 Blenheim Road (Ford)

Change of use including partial demolition and refurbishment of existing B8 distribution warehouse building to sui generis motor dealership including showroom, parts storage, workshop for vehicle servicing and maintenance, MOT testing, offices and ancillary staff and customer facilities, external vehicle display, car parking, wash bays and plant room, fencing and landscaping.

PERMITTED 07/15

15/01623/FUL

Wilsons Automobiles and Coachworks

Kiln Lane

Erection of two-storey showroom extension to existing car dealership.

PERMITTED 4/16

15/01700/ADV

Howdens

Unit D1

Longmead Business Centre

Two non-illuminated fascia signs and one non-illuminated freestanding sign.

PERMITTED 12/15

15/01844/FUL

SGN Depot

Unit 21D

5 Roy Richmond Way

Refurbishment and alterations to existing building including demolition of lean-to structure, internal alterations/layout changes, upgrading external cladding, alterations to door and window openings, creating ramp access, external boundary, drainage, surfacing, storage and parking works.

PERMITTED 5/16

16/00641/ADV

Unit D2

Longmead Business Centre

Blenheim Road

Replacement of old signage with 6 fascia signs and 1 post sign.

PERMITTED 9/16

16/00772/FUL

Dagenham Motors

Kiln Lane

Erection of new car wash facility, alterations to elevations including new cladding, installation of new roller doors and other minor alterations to fenestration. Installation of two fascia panels on west elevation (non-illuminated) over front entrance.

Permitted 11/16

16/00126/COU

Dagenham Motors

Kiln Lane

Change of use from sale of motor vehicle parts and repairs/servicing (sui generis) to sale of motor vehicles, motor vehicle parts and repairs/servicing (sui generis).

Permitted 7/16

16/00517/FUL

Sainsburys

Kiln Lane

The construction of a new retail concession pod to west of store entrance and the erection of two no. trolley shelters adjacent to existing trolley shelters.

PERMITTED 8/16

16/01109/FUL

Sainsburys

Kiln Lane

Erection of first floor mezzanine for storage associated with retail concession at ground floor

PERMITTED 12/16

16/01832/FUL

Units 1 - 2 Felstead Road

Alterations to interior layout, creation of new opening to the external wall to make a new shop entrance. Installation of a new external Canopy over an external entrance and alterations to parking layout

PERMITTED 5/17

Annex 2
Marketing information

Our Ref: DK/1Q

SUBJECT TO CONTRACT

DATE AS POSTMARK

Dear Sir/Madam,

FIRST QUARTER, EPSOM, SURREY, KT19 9QN

www.firstquarterepsom.co.uk

Please find attached the details of several modern office, production/storage units which are now available for occupation.

The units comprise modern 2 storey business units offering a mix of high quality offices to the first floor and warehouse business space to the ground floor. Facilities include car parking, three phase power, roller shutter loading door, gas central heating and an eaves height of 10' 4".

The units are available on new full repairing and insuring leases for a term to be agreed.

UNIT	SQ FT	SQ M	RENT PA	CAR PARKING	RATEABLE VALUE / RATES PAYABLE (18/19)	STATUS
13	1,544	143.43	£27,500	3 (plus loading bay)	£21,000 / £10,080	Available
15	1,544	143.43	£27,500	3 (plus loading bay)	£21,000 / £10,080	Available

Energy rating: Unit 13 – D (88) Unit 15 E (101)

For further information or specifications please do not hesitate to contact David Keates of Cattaneo Commercial on 020 8546 2166 or our joint agents Bridger Bell.

Yours faithfully,

CATTANEO COMMERCIAL

Enc

FIRST QUARTER
1Q

EPSOM, SURREY KT19 9QN

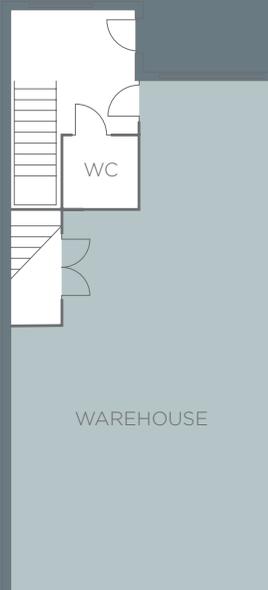
**MODERN HIGH QUALITY
FLEXIBLE BUSINESS UNITS
TO LET**

FIRST QUARTER 1Q

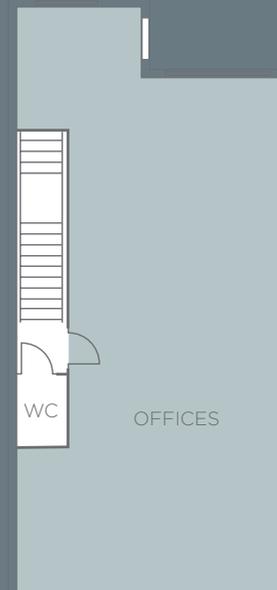
A development of modern 2 storey business units offering a mix of high quality offices and warehouse business space

First Quarter is less than half a mile from Epsom Town Centre and is situated on Blenheim Road in the Longmead Estate, Epsom's premier business location.

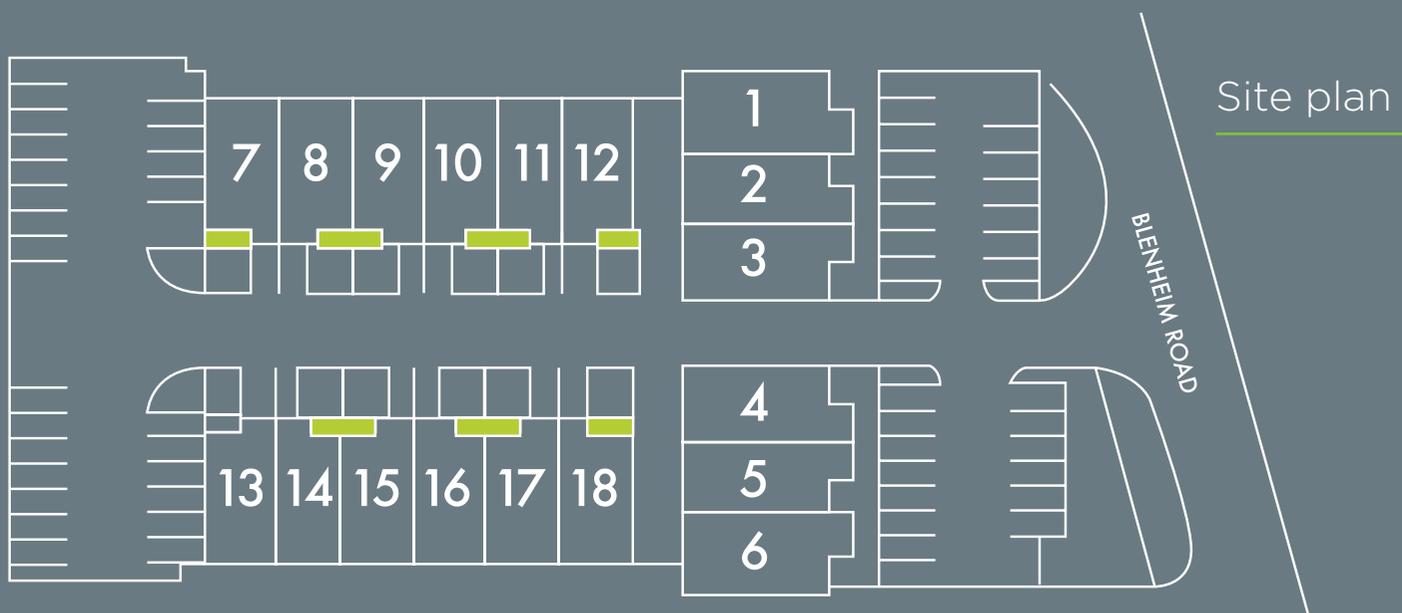
Epsom is ideally situated for access to the M25, the A3, central London, Heathrow and Gatwick Airports. Epsom Station has a regular service to Waterloo, Victoria and London Bridge.



Page 173
Typical ground floor plan.



Typical first floor plan.



Description

The accommodation comprises refurbished first floor offices with open plan ground floor warehouse / light industrial space which benefits from the following:

Amenities Warehouse

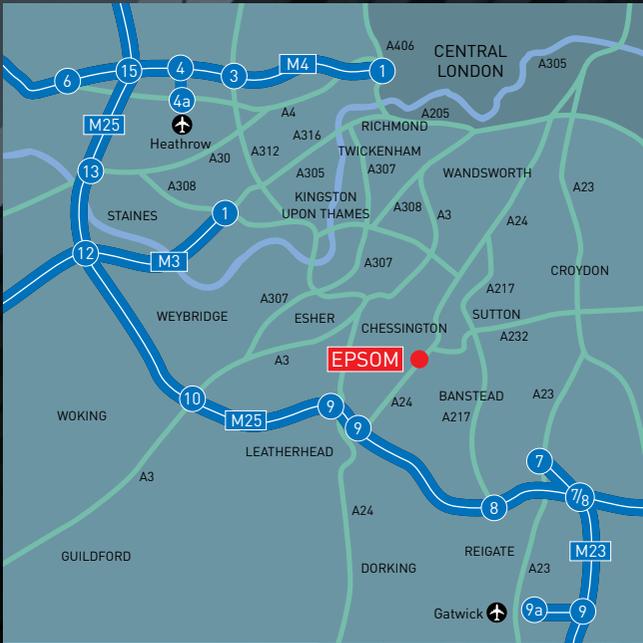
- 3 phase power
- Fluorescent lighting
- Roller shutter loading door
- Gas central heating
- Eaves height of 10' 4" (3.15 m)
- Accessible toilet
- Loading bay

Amenities First Floor Offices

- Fully carpeted
- 3 compartment perimeter trunking
- Suspended ceiling
- Recessed fluorescent lighting
- Ceiling mounted comfort cooling unit
- Gas fired central heating
- Tea station
- Double glazed windows throughout
- Toilet
- On-site parking

FIRST QUARTER 10Q

BLenheim ROAD, EPSOM, SURREY KT19 9QN



Agenda Item 7
Annex 1

Good communications to Central London and M25 motorway.

By Road

Ewell West Station	0.8 miles
Epsom Town Centre	0.9 miles
Epsom Station	1.2 miles
A3	4.0 miles
M25 motorway	5.4 miles
Central London	13 miles
Gatwick Airport	19.4 miles
Heathrow Airport	26 miles

By Rail

From Epsom	
Clapham Junction	21 mins
Guildford	29 mins
London Victoria	35 mins
London Waterloo	36 mins
London Bridge	44 mins
From Ewell West	
Wimbledon	15 mins
London Waterloo	33 mins

TERMS

New full repairing and insuring leases are available for terms to be agreed.

VIEWING

Strictly by appointment through the joint agents.

firstquarterepsom.co.uk



For Sale or To Let Modern Light Industrial/ Trade Counter Premises

263.22 sq m (2,833 sq ft)

Unit 10 Epsom Business Park, Kiln Lane, Epsom,
Surrey KT17 1JF



Accommodation: The premises have the following approximate floor areas:

Ground Floor	142.61 sq m	1,535 sq ft
Mezzanine	120.61 sq m	1,298 sq ft

Total Gross Internal Floor Area: 263.22 sq m 2,833 sq ft

All dimensions and measurements are approximate, however these are based upon the principles laid down in accordance with the RICS Code of Measuring Practice.

Description: The modern mid-terrace property is of steel framed construction and offers ground floor warehouse and production space with mezzanine offices/storage.

Mid-Day Court 30 Brighton Road Sutton Surrey SM2 5BN

Centro Commercial Limited believe these particulars to be correct. However, measurements are approximate and some details are collected from external sources and cannot be guaranteed. Accordingly, neither Centro Commercial Limited nor the vendor whose agent they are can be liable in respect of any inaccuracy in these particulars or in any other information, written or oral, supplied to the intending purchaser. Any items quoted do not include VAT where applicable.

The property described in these particulars is subject to availability and to formal contract.



Amenities:

- 3 Phase power
- Roller shutter door
- Eaves height 2.53m
- 500lbs per sq ft floor loading
- WC facilities
- Kitchenette
- On-site parking

Important Note: Centro Commercial have not tested any services, heating system, electrical system, appliances, fixtures and fittings, that may be included in this property and would advise interested parties to satisfy themselves as to their condition or investigating the presence of any deleterious materials.

Location: Epsom Business Park is located off Kiln Lane, opposite Nonsuch Industrial Estate and close to Sainsbury's Superstore. The Business Park is accessed from East Street (A24), and in close proximity to Epsom Town Centre and Mainline BR Station.

The M25 (Jct 9) and the A3 (Tolworth) are approximately 4.5 miles.

Terms: The premises are either available Freehold for sale with full vacant possession, or to let on a new Full Repairing and Insuring Lease for a term to be agreed.

Rental: The commencing rental is **£32,500 per annum exclusive**.

Price: We are instructed to seek **offers in excess of £475,000** for the Freehold interest.

Rates: To be reassessed.

NB: Please note that the rates actually payable may be subject to transitional relief. For a more accurate assessment of rates payable for the current year, please contact the Local Authority.

EPC: The property has a current rating of C (70).

Legal Costs: Each party is to be responsible for their own costs in this transaction.

Viewing: Strictly by appointment through Joint Sole Agents

Centro Commercial Limited
020 8401 1000

Bridger Bell Commercial
01372 730 000



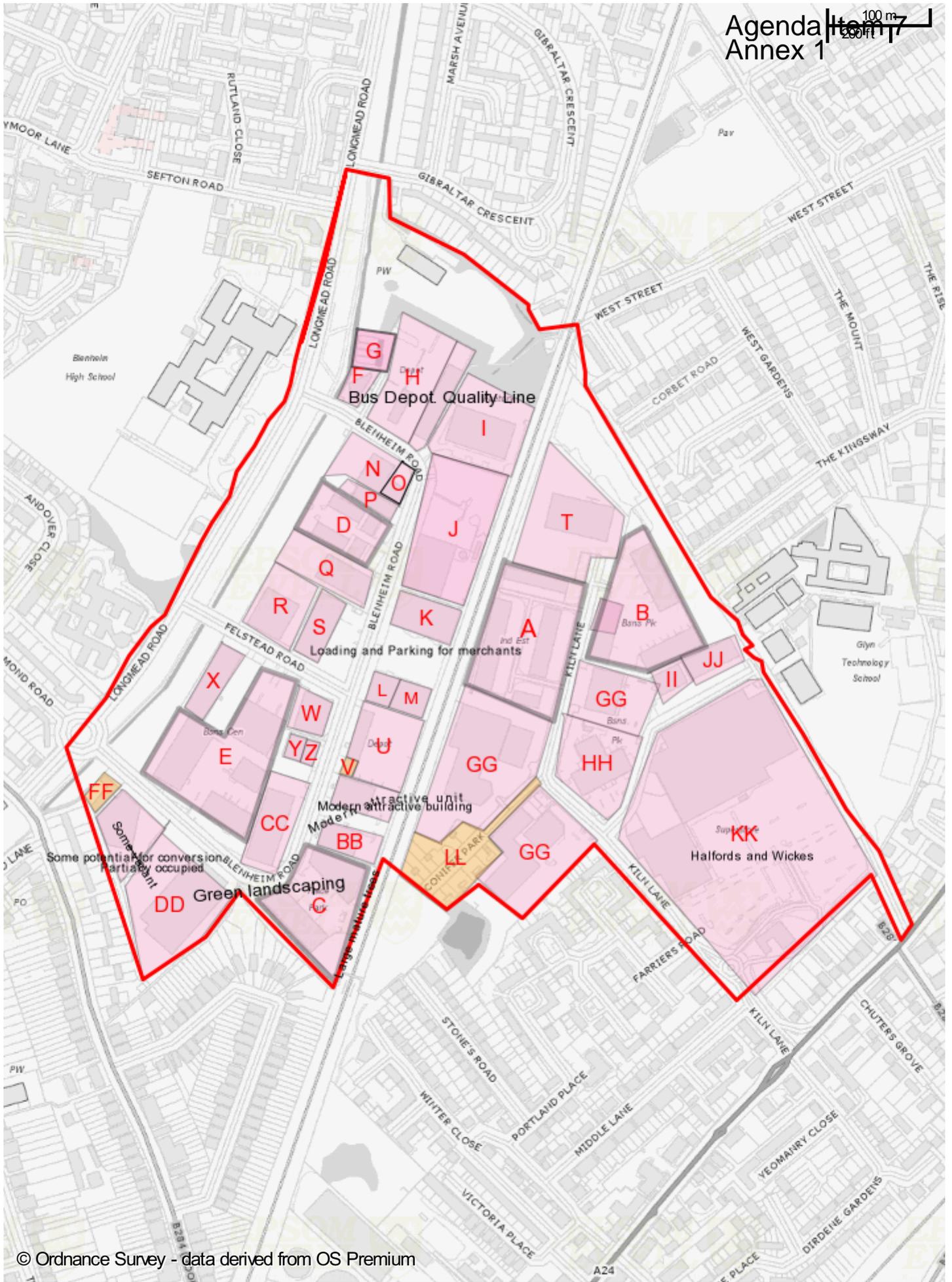
Code of Practice: Applicants should be aware that the Code of Practice for Commercial Leases in England and Wales strongly recommends you seek professional advice from a qualified Surveyor, Solicitor or Licensed Conveyancer before agreeing or signing a Business Tenancy Agreement. The Code is available through professional institutions or through the web site <http://www.leasingbusinesspremises.co.uk>.

Mid-Day Court 30 Brighton Road Sutton Surrey SM2 5BN

Centro Commercial Limited believe these particulars to be correct. However, measurements are approximate and some details are collected from external sources and cannot be guaranteed. Accordingly, neither Centro Commercial Limited nor the vendor whose agent they are can be liable in respect of any inaccuracy in these particulars or in any other information, written or oral, supplied to the intending purchaser. Any items quoted do not include VAT where applicable.

The property described in these particulars is subject to availability and to formal contract.

Annex 3
Spreadsheet of units and map



© Ordnance Survey - data derived from OS Premium

EEBC Map
Scale: 1:5000



Map Ref	Organisation	Address/ Freeholder or Leaseholder	2014 Tenure/ Lease info	Notes from site visit	Photo					
A	1-4 Norden Heating Supplies	Nonsuch Industrial Estate, Kiln lane	Picton property Freeholder 25 units leased to various tenants with leases ranging from 6 months to 10 years	1 unit to let (no 22)						
	5 The Tyre Store Ltd									
	6 Marcus Export Ltd									
	7 National blood Service									
	8 Electroco Ltd									
	9 Epsom All Class MOT Service Centre									
	10 Atkins Limited									
	11 Dunraven Manufacturing Ltd									
	12 CS Flooring Contractors									
	13 Star Sign Ltd									
	14 Freedom Flying Ltf									
	15 Marcus Export Ltd									
	16 Harris Carpentry									
	17 Four Seasons Blinds									
	18-19 Miller Autocare									
	20 Electric Center									
21 Boyden & Co Ltd										
22 vacant										
23 TBS Applications Ltd										
24-25 Toolstation										
B	A1 The Amico Studio	Epsom Business Park, Kiln lane. Various freeholders including AXA	13- Griffield are freeholder and occupier. 14- Simon Smith Flowers are freeholder and occupier. 3,4 and 7 Trade Paints are the freeholders.	The Dialysis Centre is also on this Site. No vacant units and high intensity uses						
	A2 Reliable Fire Sprinkler Co									
	3 Trade Paints									
	4 FLG Services									
	5 Tucker French Plumping and Heating merchants									
	6 Exponent UK Ltd									
	7 Rowcolour Printing									
	8-9 European Process Plant Ltd									
	10-11 Target One Field Sports Ltd									
	12b IntraLAN Group PLC									
	13 Griffield Ltd									
	14 Simon Smith Flowers									
	C					1 HSS Hire	Epsom Trade Park, Blenheim Road	No info	large trees along the railway line and footpath through to residential	
						2 Automatove Trade Supplies Ltd				
3 HPS heating Plumping Supplies Ltd										
4 Screwfix										
5&6 Storage King										

[Photo](#)[Photo](#)[Photo screwfix](#)[Photo Storage King](#)

D	1-3 Stulz UK	First Quarter Business Park, Blenheim Road	Canada Life Investments freeholder for all 18 units	2 units to let	Photo
	4 Interactive Media Group				
	5 Direction Fire				
	6 Trafag Sensors and controls				
	7 Intrepid Group				
	8 & 9 Clover Environmental				
	10 MDSI Europe Ltd				
	11 Bidatask Ltd				
	12 Stego UK				
	13 To Let				
	14 Zestan UK				
	15 To Let				
	16 Metrel UK Ltd				
	17 Blenheim				
18 Fairlight Designs Ltd					
E	A1 Graham Plumbing and heating	Longmead Business Centre, Felstead Road		No vacant units. Large communal parking and turning area	Photo
	A2 Ford Retail Ltd				
	A3 Mould Growth Consultants Ltd				
	A4 Sartorius Mechantronics UK Ltd				
	B1 Ergonomic Solutions				
	B2 Majestic Solutions				
	B3 City Plumbing				
	C Addex Group				
	D1 Howdens Joinery				
	D2 Kitchens and Joinery				
F	Marial Arts Centre/ Boxing Club/ Youth Centre	The Stephen Woods Centre, Roy Richmond Way		Adjacent to sewage storm tanks. These uses are compatible with residential and the building if of lower quality than some newer buildings nearby. These uses may be easier to re-locate than manufacturing/ industrial uses.	Photo
G	Thames Water Sewage Storm Tanks	Blenheim Road		Not compatible with residential uses	Photo
H	Quality Line RATP Group- Bus garage/ Depot	Roy Richmond way		Was Epsom Coaches	Photo

[Photo
Stulz](#)

[Photo
Howdens](#)

I	Scotia Gas Networks	Roy Richmond way		Modern building that has had lots of recent investement	Photo
J	SCC Civic Amenity Site	Blenheim Road. SCC owned.		Not compatible with residential uses	
K	Hitchcock and King	Blenheim Road		This part of the estate serves three timber merchants and requires large turning and loading areas and large storage areas	Photo
L	Flooring Specialists	Blenheim Road			
M	Travis Perkins	Blenheim Road			
N	Kitchens and bathrooms	Blenheim Road			
O	MoT Centre	Blenheim Road			
P	Epsom Car Care Centre	Blenheim Road			Photo
Q	Accident Repair centre	Blenheim Road			
R	Allams Skoda	Felstead Road	Freeholder and Occupier		
S	Wolsley	Felstead Road			
T	Wilsons Bargain Buys	Kiln Lane			
U	Longmead Depot (EEBC)	Blenheim Road			
V	EEBC Temporary Accomodation	Blenheim Road			Photo
W	Joinery Showroom	Blenheim Road/ Felstead Road		More run down unit than most on the site, low density. If looking at the site on its own it may have some potential but small site adjacent to high intensity industrial uses	Photo
X	Shelley Motors	Felstead Road			
Y	WECS Tools	Blenheim Road			
Z	Tens care	Blenheim Road			Photo
AA	Photo-Me	Blenheim Road		Modern Attractive unit. This site may have more potential to be compatable as a residential mixed use site	Photo
BB	Awe 'state of the art' HQ	Blenheim Road		Modern Attractive unit. This site may have more potential to be compatable as a residential mixed use site	Photo
CC	Tchibo Coffee International Ltd	Units 7 and 8 Blenheim Road	Warehouse and Premises (VO)	Very large warehouse unit	Photo

DD	Ford	Blenheim Road			
EE	Blenheim House- various uses including King Fu and Book Co	Blenheim Road		Some vacant units here (1 or 2). This is a more B1 focused building with some potential for conversion or redevelopment- residential flats at Maritime Court next door.	Photo
FF	Maritime Court (residential)	Blenheim Road		Residential	
GG	Wilsons (Used cars)	Kiln Lane	50 years lease		
HH	Mercedes Benz	Kiln lane (The Pavillions).	New site at the Pavillions		Photo
II	Domex Appliances				
JJ	Capita			Offices (at first we thought these were vacant)	
KK	Sainsburys, Halfords and Wickes		Wickes is a tenant and lease expires 2034. Halfords expires 2029		
LL	Gypsy and Traveller Site	Conifer Park, Kiln Lane	SCC- pitches rented individually	Fully Occupied with additional pitches required over next 15 years.	

Annex 4

Economic Growth Management
Study on behalf of Surrey County Council into the Kiln Lane Link (2014)

Responses from landowners/freeholders and major leaseholders on the Longmead and Nonsuch industrial estates when questioned as to their future aspirations for their sites.

Summary of responses:

Allams Motors (R): Business would consider adding another floor to add value to the property.

AXA (B): The organisation would consider redevelopment if they were able to act as the master planner or in collaboration with another party, or as part of a consortium. The properties are held in a long-term fund to meet the financial expectations of policyholders and over the course of the next few decades the fund will be closed in order to pay out to them.

Canada Life Investments (D): The estate has been purchased to provide income for a commercial property fund, the criteria for which dictates that income must derive from industrial property. It is emphasised that the site was not bought with any intention of redevelopment. Canada Life emphasised that the tenants are the priority. Should several units be vacant for a period of time, with no interest shown from the type of tenants the estate currently attracts, the organisation would willingly consider redevelopment for higher end employment use. It would need to be led by market demand, and meet the criteria of the commercial property fund.

Griffith Ltd (B): No plans to expand or relocate

Picton Property (A): Considered to be a very successful trading area with high demand.

Sainsburys: Some inner London stores do incorporate space for other business uses on top of the retail store

Trade Paints (3B): See the only option to expand would be vertically.

Wilsons (GG/ T): Wilsons admitted that their business, as with others in the motor trade, is 'space hungry', and consequently has also contemplated the idea of a multi-storey car park for display purposes, although it is not aware of any previous examples of this and therefore is unsure whether it is feasible.

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PROGRESS ON THE LOCAL PLAN

Head of Service/Contact:	Ruth Ormella, Head of Planning
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	
Annexes/Appendices (attached):	Annex 1: Technical Consultation on Updates to National Planning Policy and Guidance Annex 2: Draft Response to Consultation Questions
Other available papers (not attached):	Epsom & Ewell Local Plan Programme July 2018 Office for National Statistics Household Projections for England 20 September 2018

Report summary

During July 2018 the Borough Council adopted and published its latest Local Plan Programme which sets out the Council's timetable for progressing its Plan. That document signals that our new Local Plan will be submitted to the Secretary of State for examination during Autumn 2019. In order to keep members informed and to help the Committee meet that objective it is proposed to have a standing item that reports on the progress towards that target. This report provides an introduction to this approach.

The publication of a regular Local Plan item also provides a mechanism to report relevant planning policy issues to the Committee which might not otherwise merit a report of their own. Within this context, the report provides an overview of the Office for National Statistics new household growth projections and its implications for the standard method for assessing local housing need as published in national planning policy guidance.

As an addendum item, a draft response to the Ministry of Housing, Communities & Local Government recently published consultation on proposed changes to planning practice guidance on the standard method has been prepared for consideration by the Committee.

Recommendation (s)

- (1) The Committee takes note of the overview of the Office for National Statistics new household growth projections;**
- (2) The Committee notes the recently published consultation ‘Technical consultation on updates to national planning policy and guidance’ and subject to any changes agrees the Council’s draft responses to the consultation as set out in the Annex 1**

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

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

2 Background and Proposal

- 2.1 During July 2018 the Committee received and agreed a new Local Plan Programme, which sets out a timetable for the preparation, production and consultation of the new Local Plan and its associated supporting evidence. The timetable for progressing our new Local Plan is ambitious. It requires continuous progress to be made for the remainder of 2018 and throughout 2019. It identifies key milestones throughout the process, which will be used to monitor the performance of our Programme.
- 2.2 It is proposed to provide the Committee with a standing agenda item that will provide them with regular updates of progress against our adopted Local Plan Programme. The standing item will also provide opportunities to consider and inform the development of the new Local Plan as it moves forward.
- 2.3 The standing item will take the form of a brief report that will provide a brief overview of the progress being made. Where appropriate it will cross-reference to other reports being made to the Committee that cover specific issues relating to the Local Plan in greater detail. It will also provide advance notice of relevant forthcoming reports and their importance to the Local Plan process.

- 2.4 The introduction of the standing item also provides a mechanism to report other relevant planning policy matters to the Committee as they arise, which might not otherwise merit a report of their own. For example, this could encompass minor changes in national planning policy advice, or news of emerging local plans coming forward in neighbouring authorities. As such this mechanism provides the Committee with an early opportunity to engage in wider issues that may have a tangential impact on our emerging Local Plan.

3 Progress on our Local Plan

- 3.1 The Council is making good progress in reviewing the Borough's Local Plan and is currently preparing a number of technical studies to inform the next stage in the process. Some of these studies will be separately reported to this committee.
- 3.2 The Council's Local Plan will provide the overall approach to managing development within the borough and will be the key mechanism to ensure the Council's delivers the needs of community including housing and infrastructure requirements.
- 3.3 A report was taken to the Committee 27 September 2018 which informed members of the publication of the revised NPPF and outlined the key implications this has on the Borough. This included the confirmation that strategic policies should be informed by housing needs assessment as calculated by the standard method set out in national planning guidance. The objectively assessed housing need (OAHN) for Epsom and Ewell Borough Council was calculated to be 579 dwelling per annum. However, following the recent (September 2018) publication of 2016-based household projections, the OAHN is now calculated to be 372 dwellings per annum for the Borough. The implications for the updated household projections are discussed in more detail in the next section.
- 3.4 The Borough Council continues to assess possible opportunities for housing land supply necessary to meet our OAHN through the delivery of new homes. This process has included the preparation of two strategic housing land availability assessments and an on-going call-for-sites exercise. This work will help identify new sources of supply that are available for housing and discount those that are not.
- 3.5 The Borough Council seeks to respond positively to the challenge of its housing need and explore innovative approaches to significantly boost housing supply. The latest work in this area includes the Kiln Lane & Nonsuch Industrial Estate Capacity Study (that is the subject of a report to this Committee) and the forthcoming Urban Capacity Study, which will be reported to the January 2019 Committee.

- 3.6 The next step in the process of identifying sources of housing land supply will take the form of the Transformation Masterplan. It is envisaged that document will help to significantly boost the supply of housing through the application of high quality design, higher density residential development and in appropriate locations taller buildings within the existing urban areas. We are in the process of completing the commissioning of the master planning, urban design and architectural work. The Masterplan will take about twelve months to complete. During that period there will opportunities for Members, and others, to engage directly with the master planning process. Members will be informed when those opportunities arise.
- 3.7 On the basis of the above milestones, the Borough Council continues to make positive progress against the timetable set out in the current Local Plan Programme.
- 3.8 The revised NPPF introduced the new Housing Delivery Test, which the government considers will be a key mechanism for achieving rapid housing delivery. The burden of the test falls upon local planning authorities and focusses upon their ability to demonstrate a five year housing land supply calculated against their objectively assessed housing need. Failure to demonstrate a five year housing land supply can result in the government applying buffers, of values between 5% - 20% of their OAHN, to boost housing delivery.
- 3.9 The government are in the process of assessing our performance against their Housing Delivery Test. The outcomes and implications are anticipated during late 2018/ early 2019. A full report to this Committee will be prepared accordingly.

4 Office for National Statistics Household Growth Projections September 2018

- 4.1 The government's Office for National Statistics regularly publishes projections relating to future population changes. During September 2018 the Office published new household projections for England covering the period between mid-2016 to mid-2041.
- 4.2 These specifically relate to the number of households that may be created during that period of time. The Office specifically defines a household as:

"... one person living alone, or a group of people (not necessarily related) living at the same address who share cooking facilities and share a living room, sitting room or dining area. A household can consist of a single family, more than one family, or no families in the case of a group of unrelated people". (Families and Households 2017 ONS November 2017)

- 4.3 The government's standard method formula uses household growth projections as a baseline for its calculation. When household growth projections go down, it is reasonable to assume that the scale of OAHN calculated through the standard method could also fall. Equally, should the growth projections rise, then the OAHN calculated through the standard method could also be expected to rise. It is the nature of these projections that they can fluctuate as they are influenced by a variety of external factors. As a consequence, many statisticians would not necessarily interpret a single change (either upwards or downwards) in data as evidence of a new trend.
- 4.4 Early exercises carried out by external commentators that have applied the new household data appear to promise marked reductions in objectively assessed housing need for many housing market areas, including Epsom and Ewell. Theoretically the new projections could lead to an initial reduction in the Borough's OAHN from 579 new homes per annum to 372 new homes per annum. It is therefore tempting to assume that such a reduction would signal a change in the Borough Council's approach to housing delivery. Such a conclusion would be premature particularly given the recently published consultation on proposed updates to planning policy and guidance (Annex 1).
- 4.5 The new household projections are influenced by a number of factors including previous trends (i.e. the adverse financial conditions that came with the economic crash and resulting recessions), lower population growth estimates (released in May 2018) and revised assumptions regarding household formation. The consequence of this, as one experienced commentator noted, is that the projections "bake in" the adverse impacts of housing under-delivery over the last decade.
- 4.6 It is recommended that the Borough Council should approach any updated OAHN figures that apply the new household growth projections with caution. Whilst an updated calculation theoretically reduces the Borough's housing requirement from the need from 579 new homes per annum to 372 new homes per annum, this remains more than double the adopted housing target set out in the Core Strategy. Fundamentally, the scale of the Borough's objectively assessed housing need remains challenging.
- 4.7 The key consideration for the Borough Council is that the government has only recently published its revised national planning policy. A key part of that revision is the introduction of the standard method. The government themselves have emphasised in the planning practice guidance their commitment to significantly boosting the supply of new homes and have alluded to adjusting the standard method accordingly to reflect this position. They have subsequently published a 'Technical consultation on updates to national planning policy and guidance' published 26 October 2018 (Annex 1).

- 4.8 Further caution is counselled. It is likely that the forthcoming application of the new Housing Delivery Test could see the government impose additional housing “buffers” to address our potential shortfall in delivery. This would render any reduction in need, introduced through the application of the new projections, a temporary respite.
- 4.9 In conclusion, it is recommended that the Committee notes the publication of the latest household growth projections. The Committee are also asked to note that subject to a formal decision from government, the application of the new growth projections to their standard method could result in a reduction in the scale of the Borough’s OAHN. Nevertheless in real terms, the implications of the new projections on day to day planning decisions remains unchanged. Consequently, the Borough Council must continue to plan positively for housing growth of the Borough in line with the decision made by the Committee on 8 May 2018.
- 4.10 In relation to this it is also recommended that that committee agree the Council’s draft response to the subsequent ‘Technical consultation on updates to national planning policy guidance’ published by MHCLG on 26 October. An overview of this and the Borough Council’s draft response is set out in Annex 2.

5 Financial and Manpower Implications

- 5.1 The preparation and implementation of our new Local Plan imposes significant demands on staff in the Planning Policy Team and the wider Planning Department. The Local Plan Programme provides a relevant and appropriate series of performance indicators that can be utilised to monitor progress and identify whether additional resources will be required.
- 5.2 Responding to further public consultation on the government’s standard method was not factored into our Local Plan Programme. It had legitimately been assumed that this recently introduced mechanism would remain fit-for-purpose into the medium-term future. The Borough Council will seek to engage with the government’s proposed consultation, utilising the Planning Policy Team’s existing resources. Should this be insufficient, additional resources from with the wider Planning Department will be deployed. The necessity to deploy external expertise will be minimised.
- 5.3 ***Chief Finance Officer’s comments: None for the purposes of this report.***

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

- 6.1 There are no legal implications arising from the recommendations of this report.
- 6.2 ***Monitoring Officer’s comments: None arising from the contents of this report.***

7 Sustainability Policy and Community Safety Implications

7.1 None for the purposes of this report.

8 Partnerships

8.1 None for the purposes of this report.

9 Risk Assessment

9.1 Having an up-to-date Local Plan Programme is a key measure in mitigating possible risk of direct intervention by the government. Ensuring that our agreed milestones towards Submission and examination are met is important. Should we fail to meet our targets we are likely to face criticism and the possibility of intervention. The proposed standard item provides the Committee with a mechanism to monitor and engage in the process progressing towards the Submission stage. In particular it provides an early warning system in identifying possible areas of risk – including delay – and the mitigation measures that could be deployed in response.

9.2 National planning policy requires that we identify the scale of our objectively assessed housing need through the Standard Method¹. Local planning authorities may only consider deviating from the Standard Method in exceptional circumstances. Should the Borough Council take the decision to deviate from the Standard Method, even by applying different metrics, there is a risk that our Plan will be considered unsound.

10 Conclusion and Recommendations

10.1 The Committee are requested to note of the overview of the Office for National Statistics new household growth projections;

10.2 The Committee notes the recently published consultation 'Technical consultation on updates to national planning policy and guidance' and subject to any changes agrees the Council's draft responses to the consultation as set out in the Annex 2.

Ward(s) affected: (All Wards);

¹ This is set out under National Planning Policy Framework Paragraph 60 and under National Planning Practice Guidance Paragraph 002 Reference ID 2a-002-20180913.

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Ministry of Housing,
Communities &
Local Government

Technical consultation on updates to national planning policy and guidance



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Scope of the consultation

Topic of this consultation:	This consultation seeks views on: <ul style="list-style-type: none"> • Changes to planning practice guidance relating to the standard method for assessing local housing need • Policy clarifications relating to housing land supply, the definition of deliverable and appropriate assessment.
Scope of this consultation:	The Ministry of Housing, Communities and Local Government is consulting on changes to planning practice guidance and policy clarifications, which will involve amendments to the National Planning Policy Framework.
Geographical scope:	These proposals relate to England only.
Impact Assessment:	N/A

Basic Information

To:	This consultation is open to everyone. We are keen to hear from a wide range of interested parties from across the public and private sectors, as well as from the general public.
Body/bodies responsible for the consultation:	Ministry of Housing, Communities and Local Government
Duration:	This consultation will begin on Friday 26 October 2018 and will close at 23.45 on Friday 7 December 2018.
Enquiries:	For any enquiries about the consultation please contact: planningpolicyconsultation@communities.gov.uk
How to respond:	<p>Consultation responses should be submitted by online survey: https://www.surveymonkey.co.uk/r/technicalplanningconsultation</p> <p>We strongly encourage responses via the online survey, particularly from organisations with access to online facilities such as local authorities, representative bodies and businesses. Consultations on planning policy receive a high level of interest across many sectors. Using the online survey greatly assists our analysis of the responses, enabling more efficient and effective consideration of the issues raised for each question.</p>

We have listened to concerns about the use of online surveys in the past and have made a number of adjustments ahead of this consultation. The online survey will allow respondents to: save and return to the survey later; and submit additional information or evidence to support their response to this consultation.

Further advice on how to use these new features is available on the home page of the online survey. Should you be unable to respond via the online survey we ask that you complete the pro forma found on the webpage. Additional information or evidence can be provided in addition to your completed pro forma.

In these instances you can email your pro forma to:
planningpolicyconsultation@communities.gov.uk

Or send to:
Planning Policy Consultation Team
Ministry of Housing, Communities and Local Government
3rd floor, South East Fry Building 2 Marsham Street LONDON
SW1P 4DF

Introduction

1. This consultation is seeking views on changes to planning practice guidance on the standard method for assessing local housing need.
2. The Government's priorities are to deliver more and better-designed homes, and to do so faster. This has been the theme of reforms undertaken over the last 18 months, from the White Paper [Fixing the broken housing market](#), to the revision of the [National Planning Policy Framework](#), which have been about delivering the homes this country needs, in the places people want to live. This includes supplying homes to meet the diverse needs of our communities, such as homes for first time buyers, homes suitable and accessible for older people, high quality rental properties and well designed social housing.
3. A key aim of these reforms is to ensure local planning authorities plan for the right homes in the right places, in an open, transparent and sustainable way, and to ensure the debate in each area can focus on how to deliver more, better homes, rather than spending unnecessary time on how many homes are needed. To do so the Government introduced a standard method for assessing housing need to ensure local authorities and the communities they serve have a consistent starting point when understanding how many homes are needed in their local area.
4. Last year over 217,000 new homes were supplied, the highest number for more than ten years. This is a good start, and means more people have a choice when it comes to deciding where to live. But more must be done. The average house in England costs almost eight times average earnings, making home ownership unaffordable for many people.
5. The recent household projections release, published by the Office of National Statistic (ONS), has led some areas to reconsider the number of homes they were planning for. However, as the ONS has [confirmed](#), lower household projections do not mean fewer homes need to be built. If more homes are planned for and delivered, more people will be able to own or rent their own home. This consultation therefore proposes changes to the standard method to ensure consistency with the objective of building more homes, whilst providing the stability communities need.
6. This consultation also proposes minor clarifications to national planning policy on housing land supply, the definition of deliverable sites and appropriate assessment for habitats sites.

Local housing need assessment

Revising the standard method for assessing housing need to be consistent with increasing housing supply

7. At Budget 2017 the Government announced that it would enable the housing market to deliver 300,000 homes a year on average by the mid-2020s. In March 2018 the draft National Planning Policy Framework was published for consultation. This included a proposal for a standard method of assessing local housing need. Using data published in September 2017 as part of the [Planning for the right homes in the right places](#) consultation, this would, in aggregate, plan for around 266,000 homes across England (based on 2014 household projections and Spring 2017 local ratios of median house prices to median earnings). The draft Framework also made clear that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed¹.
8. In October 2017 the ONS published new national population projections, based on the latest data for mortality, fertility and migration. These project that, nationally, the population of England will grow less rapidly (3.0 million between 2018-19 and 2028-29) than forecast in 2014 (3.8 million 2018-19 to 2028-29). This suggested that the Government might need to review both its aspirations for housing supply and how this is reflected in planning policy.
9. The final version of the revised National Planning Policy Framework, published in July this year, confirmed that strategic policies should be informed by a local housing need assessment conducted using the standard method. The method is set out in [planning practice guidance](#) published alongside the revised Framework. Given that the ONS would need to produce new local authority level household projections based on the 2016 population projections, the Government's response to the consultation on the draft Framework included a clear commitment to keep the standard method under review;

"In the housing White Paper the Government was clear that reforms set out (which included the introduction of a standard method for assessing housing need) should lead to more homes being built. In order to ensure that the outputs associated with the method are consistent with this, we will consider adjusting the method after the household projections are released in September. We will consult on the specific details of any change at that time. It should be noted that the intention is to consider adjusting the method to ensure that the starting point in the plan-making process is consistent in aggregate with the proposals in Planning for the right homes in the right places consultation and continues to be consistent with ensuring that 300,000 homes are built per year by the mid 2020's."

¹ Paragraph 60: [National Planning Policy Framework: Draft text for consultation](#)

10. The ONS published the latest household projections on 20 September 2018. These reduce the projected rate of household formation compared to the previous projections by 53,000 a year between 2018 and 2028². These lower projections of household growth result in the national minimum annual housing need calculated using the standard method falling significantly; from approximately 269,000 homes prior to the publication of the updated household projections, to approximately 213,000 based on the updated data. This is below the 217,350 homes delivered last year³.
11. The Government has considered whether it needs to change its aspirations for housing supply in light of the new household projections, and in particular whether these imply that 53,000 fewer homes are needed each year than previously thought. It has decided it is not right to change its aspirations. First, the annual change in household projections comprises two aspects: a reduction of 29,000 arising from the lower population projections, and a reduction of 23,000 arising from changes in the method for converting population change into estimates of household formation – (reducing the historic period of household formation on which the projections are based from five census points to two, which focuses it more acutely on a period of low household formation where the English housing market was not supplying enough additional homes). Methodological changes are not a reason why the Government should change its aspirations. In addition;
1. Household projections are constrained by housing supply. If new, additional homes are not supplied, then households cannot form as there would be nowhere for them to live. This means that actual household growth cannot exceed the number of additional homes which are actually supplied. The ONS household projections show that the average household size is projected to be 2.33 by 2028 compared to 2.27 in the 2014 based household projections; this means that in order to just keep household size constant at the 2014 based projected level, 64,000 additional homes per year would be needed in excess of the current projections;
 2. The historic under-delivery of housing means there is a case for public policy supporting delivery in excess of household projections, even if those projections fall. Cheshire⁴ estimated that “between 1994 and 2012, building fell short of what was needed by between 1.6 and 2.3 million houses”. Given that households cannot form if new houses are not built for them to move into, this undersupply will have resulted in pent-up demand;
 3. Other things being equal a more responsive supply of homes through local authorities planning for more homes where we need them will help to address the effects of increasing demand, such as declining affordability, relative to a housing supply that is less responsive. Published econometric research⁵ consistently finds that in the UK supply is less responsive to demand relative to other countries.
 4. The above factors have led to declining affordability, as evidenced by the decrease in the number of people living in an area with an affordability ratio of 4

² [2016-based household projections in England](#)

³ [Housing supply: net additional dwellings](#)

⁴ [Turning houses into gold: the failure of British planning](#)

⁵ [The Barker Review of Housing Supply](#), Interim Report

or less: from 23 million (47% of the population) in 2000, to 395,000 (less than 1% of the population) in 2017. Similarly, there has been an increase in those living in areas with an affordability ratio of more than 8: from 2.8 million (around 6% of the population) to 28 million (nearly 50% of the population) over the same period. This indicates that the Government should not be less ambitious for housing supply.

12. Furthermore, population changes are only one aspect of the driver for housing supply. Rising incomes, changing social preferences and factors such as real interest rates and credit availability contribute to demand for housing. In summary, the Government's judgment is that these factors combine to indicate that there is no need to change its aspirations for increasing housing supply. This is consistent with the argument in the [housing White Paper](#) that the ambition of delivering more homes should be about both keeping pace with population growth and looking to address worsening affordability through tackling the previous undersupply of homes.

13. The ONS has made the following statements about the updated household projections:

“They do not take account of how many people may want to form new households, but for whatever reason aren't able to, such as young adults wanting to move out of their parents' house, or people wanting to live on their own instead of in a house share. Therefore, household projections are not a measure of how many houses would need to be built to meet housing demand; they show what would happen if past trends in actual household formation continue.”

“Although the latest household projections are lower than the previously published projections, this does not directly mean that fewer houses are needed in the future than thought. This is because the projections are based on recent actual numbers of households and are not adjusted to take account of where homes have been needed in recent years but have not been available. Therefore, if more homes are built, the increased availability of homes may result in more households forming. The opposite is also true – if fewer homes are built then fewer households are able to form.”⁶

14. There is wider consensus that a significant increase in housing delivery compared to current levels is required. KPMG and Shelter⁷ reported that to just meet rising future demand a minimum of 250,000 new homes are needed per year. The House of Lords Select Committee on Economic Affairs report '*Building more homes*'⁸ found that “to meet this demand and have a moderating effect on house prices, at least 300,000 homes a year need to be built for the foreseeable future”. The Chartered Institute for Housing report that ‘the current backlog of households with housing need is four million in England’.⁹

⁶ [What our household projections really show](#)

⁷ [KPMG and Shelter, Building the homes we need](#)

⁸ [The House of Lords Select Committee on Economic Affairs report 'Building more homes'](#)

⁹ [Chartered Institute of Housing:2018 UK Housing Review](#)

15. The issue then arises of how the Government supports delivery of this through planning policy. The standard method for assessing minimum housing need was designed to identify an appropriate level of need in a straightforward, transparent way. It does not represent a mandatory target for local authorities to plan for, but the starting point for the planning process. Local planning authorities may decide that exceptional circumstances justify the use of an alternative method, but they will need to identify these reasons and can expect them to be tested by the Planning Inspectorate during the examination of their plans. Local authorities may also not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere.
16. Given the projected household growth and local affordability pressures at the time, the *Planning for the right homes in the right places* consultation specified that the affordability adjustment at the level proposed ‘achieves the overall level of delivery that most external commentators believe we need, while ensuring it is delivered in the places where affordability is worst’. It was specified that the uplift for affordability was applied to be consistent with the level of delivery identified in the [housing White Paper](#).
17. In view of the forthcoming revisions to household projections a commitment to ensuring that this remained the case was made in the [Government response](#) to the *Planning for the right homes in the right places* consultation as follows:
- ‘The standard method is a key part of the Government’s ambition to deliver the right number of homes in the right places. The methodology is based on population growth projections which can change. We propose to keep the methodology under review to ensure that quantity and approximate distribution of need that is established by the standard methodology remains appropriate.’*
18. As noted above, this commitment was reiterated in the Government’s response to the consultation on the draft National Planning Policy Framework. Given this, the Government considers that planning policy should respond flexibly and support the aspiration of supporting a market that delivers 300,000 homes. In doing so its principles are:
- providing stability and certainty for local planning authorities and communities;
 - ensuring that planning responds not only to movements in projected households but also to price signals; and
 - ensuring planning policy supports a housing market that works for everyone.

The Government’s proposed approach

19. The Government considers that the best way of responding to the new ONS household projections and delivering on the three principles in paragraph 18 above is to make three changes:
1. For the short-term, to specify that the 2014-based data will provide the demographic baseline for assessment of local housing need.

2. To make clear in national planning practice guidance that lower numbers through the 2016-based projections do not qualify as an exceptional circumstance that justifies a departure from the standard methodology; and
 3. In the longer term, to review the formula with a view to establishing a new method that meets the principles in paragraph 18 above by the time the next projections are issued.
20. All other elements of the standard method of assessing housing need would, for now, remain unchanged. The use of the standard method applies to plan-making for plans submitted on or after the 24 January 2019. Any period specified for using the 2014-based projections would use this as the start date. As specified in existing planning practice guidance the relevant housing need figure can be relied upon for the purposes of plan examination for 2 years. For decision making, any proposed revisions would apply from the day of publication of the revised planning practice guidance, unless otherwise stated. This change can be implemented by changes to national planning practice guidance.

Stability and certainty

21. This approach meets the principles above as follows. In terms of stability and certainty, based on published Local Development Schemes there are approximately 50 plans that will be submitted for examination in 2019. Any of these plans that are submitted on or after the 25 January 2019 will be required to use the standard method to inform strategic housing policy. The proposed change would provide certainty and stability to these authorities and avoid the need to restart the planning process. The Government has heard from a number of authorities that the extent of change associated with 2016-based household growth projections, when compared to 2014-based projections, is already resulting in delays and uncertainty in the plan-making process.
22. There are also 62 strategic plans currently at examination. Under the transitional arrangements set out in the revised National Planning Policy Framework, these plans do not need to be informed by a housing need assessment using the standard method. However, in cases where the minimum annual housing need figure calculated using the standard method, is identifying a number below the proposed figures being taken forward by plan-making authorities, the standard method is being used as the basis to challenge previous conclusions. Considering this challenge is likely to have resource implications and has the potential to cause delays.
23. The Government notes that using the new household projections and leaving the formula unchanged means that 146 local authorities would see changes in their local housing need of more than 20 per cent (when compared to the figures at the point of consultation in September 2017). By adopting the approach above only 16¹⁰ authorities see their local housing need change by more than 20%.

¹⁰ Based on comparing the 2014-based consultation figures to the updated plan numbers and affordability ratio and 2014-based figures.

Maintaining price signals

24. In terms of maintaining price signals, this approach retains all other elements of the standard method of assessing housing need established in planning guidance. Where affordability as specified by the ratio of local median house prices to local median earnings exceeds four, the formula will continue to increase local housing need above household projections.

Consistency with our aspirations

25. In terms of consistency with the Government's aspirations for housing supply, using the 2014-based population projections, current affordability estimates and current plan status, the Government estimates that it would deliver 269,000 homes – within 3,000 of the estimates produced by the previous formula. The Government notes that the number of homes delivered through the standard methodology is lower than its aspirations for 300,000 homes. However, the number of homes permitted generally exceeds that provided for in plans, while the gap can also be bridged by ambitious authorities going above their local housing need, including through housing deals with the Government, in regions like the Cambridge-Milton Keynes-Oxford corridor where significant national infrastructure investment to support productivity growth should also enable increased housing supply and through homes delivered through permitted development rights.

Q1: Do you agree that planning practice guidance should be amended to specify that 2014-based projections will provide the demographic baseline for the standard method for a time limited period?

26. Options for changing the standard method using the 2016-based data have been considered. However all options that rely on the 2016-based data as the demographic baseline would lead to significant change at a local level (when compared to using the 2014-based data as the baseline). The Government considers that the impact this will have in delaying plan-making would represent an unacceptable consequence and therefore short term options relying on the use of the 2016-based data have been discounted.

Clarifying that 2016-based projections are not a justification for lower housing need

27. The Government considers that this is a reasonable approach in the short term because:
1. Basing the assessment of local housing need on 2016-based household projections, would either not support the Government's objective of significantly boosting the supply of homes (if other variables were unchanged) or produce major distributional changes that would produce instability for local planning authorities in general (if other variables were changed to produce an aggregate consistent with other estimates). For example, if the Government were to change the parameters of the formula to ensure the level of minimum local

housing need is consistent with previous levels¹¹ 151 local authorities would see changes in excess of 20%.

2. Although the Government generally recommends the use of the latest data in producing assessments of housing need, in this case there have been substantial changes in the method for producing the projections that have resulted in major changes in the distribution of households nationally, and the Government would like to see the new method settling down before making a decision on whether this data provides the best basis for planning; and
3. Local housing need does not represent a mandatory target – it is simply a starting point for planning, and local authorities may either choose to plan in excess of this or to conclude that they are not able to meet all housing need within their boundaries, for example due to constraints such as protected designations and Green Belt, or whether that need is better met elsewhere. This means there is flexibility for local authorities to manage movements in local housing need locally.

Q2: Do you agree with the proposed approach to not allowing 2016-based household projections to be used as a reason to justify lower housing need?

Applying the cap to spatial development strategies

28. Where the standard method for assessing local housing need is used to calculate the minimum housing need for the purposes of informing a spatial development strategy, current planning practice guidance does not specify how the cap in the standard method should be applied.

29. It is proposed to clarify in guidance that the cap should be applied to the total plan requirement figure, as opposed to capping based on the requirement figure of the individual constituent local authorities. Applying the cap to a single figure increases the simplicity of calculation.

Q3: Do you agree with the proposed approach to applying the cap to spatial development strategies?

¹¹ For example, by adjusting the affordability adjustment factor from 0.25 to 0.55 and the cap from 40% to 75%

Housing land supply

30. The revised National Planning Policy Framework uses the standard method for assessing local housing need as the baseline for housing land supply calculations where plans are considered to be out of date, as well as providing the foundation for plan-making. Minor clarifications to the relevant policy wording in the Framework, and to the glossary, are proposed to remove any ambiguity about how this aspect of national policy is intended to be applied.
31. Subject to the outcome of this consultation, the Government intends to publish updated planning guidance on housing need assessment, and a new version of the National Planning Policy Framework incorporating the policy clarifications that are proposed (including those on the definition of deliverable and appropriate assessment set out later in this consultation).
32. The basis for determining an authority's five year housing land supply requirement (as set out in paragraph 73 of the Framework) is either:
- an up to date housing requirement set out in strategic policies (where these are less than five years old, or older if they have been reviewed within the five years and do not need updating); or
 - local housing need. Using this as the baseline where policies are out of date is intended to simplify the planning application and appeals process by ensuring a consistent approach.
33. Paragraph 60 of the Framework and the definition of 'local housing need' in the glossary allow authorities to use a justified alternative approach to the standard method for calculating housing need, in exceptional circumstances. This is intended to apply only when strategic policies are being produced, rather than inviting alternative approaches and calculations of need in the determination of applications and appeals where housing land supply is a relevant matter.
34. To make this clear, we propose making two minor amendments to the text of the Framework, as follows:
- Amend footnote 37, to add at the end: "Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance".
 - Amend the definition of local housing need in the glossary to: "The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework)".

Q4: Do you agree with the proposed clarifications to footnote 37 and the glossary definition of local housing need?

The definition of deliverable

35. Paragraph 73 of the Framework expects local planning authorities to identify and update annually a supply of specific 'deliverable' sites sufficient to provide a minimum of five years' worth of housing against their housing requirement.
36. The new Framework published in July this year set out a revised definition of 'deliverable' (contained in the glossary at Annex 2 of the Framework). Early experience of applying this definition has suggested that it would benefit from some clarification of the wording. In particular, the existing text could be clearer that sites that are not major development, and which have only an outline planning consent, are in principle considered to be deliverable. The relationship between the first sentence of the definition (which sets out general considerations in terms of deliverability), and the remainder that explains how particular circumstances should be approached, also needs to be clear. The specific circumstances cited in the definition are intended to indicate how the general considerations in the first sentence apply to the types of development referred to in the text that follows.
37. Consequently, we propose to amend the definition of deliverable to clarify its intended application. The revised definition would be:

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
 - b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
38. To further support the application of this policy, and subject to the outcome of the present consultation, we will produce additional national planning guidance to provide further information on the way that sites with different degrees of planning certainty may be counted when calculating housing land availability.

Q5: Do you agree with the proposed clarification to the glossary definition of deliverable?

Development requiring Habitats Regulations Assessment

39. Following the ruling of the European Court of Justice on case C323/17 (*People over Wind, Peter Sweetman v Coillte Teoranta*), we propose to make one additional clarification to national planning policy.
40. The effect of the ruling is that appropriate assessment of habitats impacts is required in plan-making and decision-making whenever there is a potential impact on a habitats site, regardless of any mitigation measures proposed.
41. One of the measures which the National Planning Policy Framework takes to protect habitats sites is to disengage the presumption in favour of sustainable development where there is potential for harm to these sites. However the judgment means that sites with suitable mitigation are now excluded from the application of the presumption, which was not the intention of the policy.
42. To rectify this we propose to amend paragraph 177 of the Framework to make clear that the presumption is disapplied only where an appropriate assessment has concluded that there is no suitable mitigation strategy in place. The revised paragraph would read:
177. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that there will be no adverse effect from the plan or project on the integrity of the habitats site.
43. The European Court judgment was delivered after the consultation on the revised Framework was published in March this year. Although some consultation responses asked for an amendment to the Framework in the light of the ruling, there was not an opportunity for all interested parties to comment at the time. Alongside the minor change to paragraph 177 that we are now proposing to make, we are considering what other changes to regulations and guidance may be necessary following the European Court's ruling¹².

Q6: Do you agree with the proposed amendment to paragraph 177 of the National Planning Policy Framework?

¹² On 23 June, the EU referendum took place and the people of the United Kingdom voted to leave the European Union. Until exit negotiations are concluded, the UK remains a full member of the European Union and all the rights and obligations of EU membership remain in force. During this period the Government will continue to negotiate, implement and apply EU legislation. The outcome of these negotiations will determine what arrangements apply in relation to EU legislation in future once the UK has left the EU.

About this consultation

1. This consultation document and consultation process have been planned to adhere to the Consultation Principles issued by the Cabinet Office.
2. Representative groups are asked to give a summary of the people and organisations they represent, and where relevant who else they have consulted in reaching their conclusions when they respond.
3. Information provided in response to this consultation, including personal data, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018 (DPA), the General Data Protection Regulation, and the Environmental Information Regulations 2004).
4. If you want the information that you provide to be treated as confidential, please be aware that, as a public authority, the Department is bound by the Freedom of Information Act and may therefore be obliged to disclose all or some of the information you provide. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.
5. The Ministry of Housing, Communities and Local Government will process your personal data in accordance with the law and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties. A full privacy notice is included at Annex A.
6. Individual responses will not be acknowledged unless specifically requested.
7. Your opinions are valuable to us. Thank you for taking the time to read this document and respond.
8. Are you satisfied that this consultation has followed the Consultation Principles? If not or you have any other observations about how we can improve the process please contact us via the [complaints procedure](#).

Annex A

Personal data

The following is to explain your rights and give you the information you are be entitled to under the Data Protection Act 2018.

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the data controller and contact details of our Data Protection Officer

The Ministry of Housing, Communities and Local Government (MHCLG) is the data controller. The Data Protection Officer can be contacted at dataprotection@communities.gsi.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

The Data Protection Act 2018 states that, as a government department, MHCLG may process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

We will not share your personal data with organisations outside of MHCLG without contacting you for your permission first.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for three years from the closure of the consultation.

6. Your rights, e.g. access, rectification, erasure

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:

- a. to see what data we have about you
- b. to ask us to stop using your data, but keep it on record
- c. to ask to have all or some of your data deleted or corrected
- d. to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. The Data you provide directly will be stored by Survey Monkey on their servers in the United States. We have taken all necessary precautions to ensure that your rights in terms of data protection will not be compromised by this.

8. **Your personal data will not be used for any automated decision making.**
9. **Your personal data will be stored in a secure government IT system, which will be transferred from Survey Monkey shortly after the consultation closes.**

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1. Introduction

- 1.1 The recent publication of new household growth projections, by the Office of National Statistics (ONS), has opened up the possibility of reductions in the housing requirements being generated through the government's standard method for objectively assessing need.
- 1.2 In response the government has published a consultation on proposals to update planning practice guidance. The consultation closes on 7 December 2018. The key purpose of the consultation is to seek views on proposals to make changes planning practice guidance relating to the standard method for assessing local housing need, so that it aligns with the government's objective of increasing housing delivery.
- 1.3 In addition to the above, the consultation also seeks views on proposals to clarify national planning policy on:
- Housing land supply
 - The definition of deliverable; and
 - Appropriate assessment
- 1.4 The timing of the publication of the government's consultation has meant that this report has been prepared as an addendum to another report to the Licensing & Planning Policy Committee. The Committee are asked to consider the proposals set out in the consultation and the draft responses, which are enclosed. Subject to the Committee's agreement it is proposed that the responses serve as the basis for the Borough Council's formal response to the consultation.

2. The Proposed Changes to the Housing Need Assessment

- 2.1 The government's standard method formula uses household growth projections as a baseline for its calculation. When household growth projections go down, it is reasonable to assume that the scale of Objectively Assessed Housing Need (OAHN) calculated through the standard method could also fall. Equally, should the growth projections rise, then the OAHN calculated through the standard method could also be expected to rise.
- 2.2 Following the publication of the latest household growth projections in September 2018, there have been calls for clarity on the government's approach to OAHN. In response, the government has published this consultation that reinforces their commitment to deliver more homes and therefore proposes changes to the NPPF and Planning Practice Guidance that reflect their aspirations. They clearly state that

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methodological changes are not a reason to change their policy approach or aspirations. They provide four reasons for this conclusion:

- Household projections are constrained by housing supply;
- Historic under-delivery means that there is a case for public policy supporting delivery that exceeds the household projections;
- A more responsive supply of new homes will help address the effects of increasing demand; and
- The above factors have led to declining affordability – which the government believes is good reason for them to not be less ambitious for housing supply.

2.3 As further justification for maintaining its approach, the government states that population changes are only one aspect of housing supply. They cite rising incomes, changing social preference, real interest rates and credit availability as all contributing towards demand for new housing. Furthermore, the government has quoted the ONS position on the recent household growth projections, which itself distances the projections from any possible consequential reduction in housing need or demand. In short, the government believes that lower household growth projections does not equate to a reduced housing requirement.

2.4 The government states that it will respond flexibly and maintain its aspiration of supporting a housing market that delivers 300,000 new homes per annum. In order to achieve this aspiration it will apply its principles of –

- Providing stability and certainty for local planning authorities and communities;
- Ensuring that the planning system responds not only to projected population growth but also price signals; and
- Ensuring that planning policy supports a housing market that works for everyone.

2.5 In order to meet these three principles the government have identified three changes –

- For the short-term (time unspecified), the 2014-based data will provide the demographic baseline for calculating OAHN. In short, this means that for the time being the government propose to disregard the recently published household growth projections;
- To clarify, the lower numbers that potentially emerge from the new household growth projections (the 2016-based projections) do not qualify as exceptional circumstances and do not constitute a justification to depart from the standard method. In short, local

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planning authorities are not to use the new projections to come up with their own OAHN.

- In the longer term (time unspecified), the government will review the formula used in the standard method – with a view to identifying a new standard method by the time the next projections are issued. This suggests a time line of between two – four years before a new/ revised standard method is consulted upon.

3. The Consultation Questions and Draft Answers

- 3.1 The Consultation Paper poses six questions. The first two questions address the key issues that will be of interest to most local planning authorities – in that they relate to the base line data used by the standard method to set our housing requirement.
- 3.2 In preparing a draft response to these questions, the Borough Council has considered the soundness of the government’s proposed approach in the same way that a Planning Inspector would consider evidence presented at a Local Plan examination. In conclusion, the Borough Council considers that the government cannot build a sound housing strategy based on a combination of out of date evidence and supposition. If the Borough Council were to take such an approach with the Local Plan it would be found unsound.
- 3.3 The third question seeks comments on the proposal to provide further clarity on the application of the cap (to housing growth) when preparing spatial development strategies. This is an academic question for the Borough Council as the scale of objectively assessed housing need calculated through the standard method is so high that could not possibly be delivered within the Borough during the local plan period.
- 3.4 The fourth question is more relevant to the Borough Council as it relates to the potential application of “exceptional circumstances” to justify the use of alternative mechanisms (to the standard method) in calculating objectively assessed need.
- 3.5 The remaining questions primarily concern themselves with introducing further clarity to the national policy framework.
- 3.6 The following have been prepared as draft responses to the consultation questions:

Q1: Do you agree that planning practice guidance should be amended to specify that 2014-based projections will provide the demographic baseline for the standard method for a time limited period?

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Whilst the Council appreciates the principles of providing certainty. No, it does not agree with this proposal. National planning policy requires that Local Plans be justified and based upon sound up-to-date evidence. It is therefore counterintuitive for the government to suggest that the latest evidence of population growth should effectively be discounted in the short. The government has failed to present a compelling case, in consultation documentation that supports the continued use of population growth projections that are now out of date old.

Furthermore, the government's calculation and justification for setting an arbitrary national housing delivery target of 300,000 new homes per annum is itself unclear. The Borough Council understands and accepts that population projections fluctuate and that consequently a target needs to take account of other factors. However, the consultation provides no metrics to justify the admitted disparity in 31,000 new homes per annum that falls out of the standard method when the 2014 projections are applied. The only justification provided is that delivery will exceed projections and "bridge the gap".

On that basis the government's proposed target cannot be considered sound – as it is not justified by evidence. This does not inspire confidence in the government's. If the 2014-based projections are to be used by the standard method then the national housing target can only be 269,000 new homes per annum. Any additional delivery should be considered as a windfall and counted against subsequent annual targets. That approach is consistent with housing monitoring methodologies used across the country.

Q2: Do you agree with the proposed approach to not allowing 2016-based household projections to be used as a reason to justify lower housing need?

No, the Borough Council disagrees with this proposal. As set out above, national planning policy requires that local plans be justified and prepared using robust up-to-date evidence. The government's discounting of the 2016 population projections and the recent household growth projections appears counter intuitive and is not supported by robust evidence.

This consultation process does not add any clarity on the potential nature of scenarios where local planning authorities could demonstrate "exceptional circumstance". Indeed, if anything the government's latest proposals appear to severely restrict any potential consideration of "exceptional circumstances". In that respect it would be helpful for the government to provide further definition on the criteria that could help define the situations where "exceptional circumstances" could legitimately be deployed.

Whilst the Borough Council fully supports the objective of meeting housing need, in particular meeting the acute needs of the people of the Borough's

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Housing register, it cannot support a national housing strategy that is based on unsound evidence and supposition.

Q3: Do you agree with the proposed approach to applying the cap to spatial development strategies?

The Borough Council welcomes all attempts by the government to provide further clarity to the recently published national planning policy framework.

Q4: Do you agree with the proposed clarifications to footnote 37 and the glossary definition of local housing need?

The Borough Council welcomes all attempts by the government to provide further clarity to the recently published national planning policy framework.

However, the Borough Council believes that the government needs to provide further clarity on the criteria that will be deployed to determine when “exceptional circumstances” are justified.

The Borough Council disagrees with the implication that “exceptional circumstances” can only occur within a strategic planning context. The government has provided no evidence to support this assumption. By their very nature “exceptional circumstances” may arise in unique and unlikely circumstances and clearly cannot be arbitrarily be restricted. If the government wishes the standard method to be the only mechanism for calculating objectively assessed need then it should say so – rather than providing phantom solutions that will ultimately be discounted through the local plan examination process.

Q5: Do you agree with the proposed clarification to the glossary definition of deliverable?

The Borough Council welcomes all attempts by the government to provide further clarity to the recently published national planning policy framework. However, the Borough Council believes that the proposed wording is unclear and needs reviewing.

Q6: Do you agree with the proposed amendment to paragraph 177 of the National Planning Policy Framework?

The Borough Council welcomes all attempts by the government to provide further clarity to the recently published national planning policy framework.

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