

LICENSING AND PLANNING POLICY COMMITTEE

Thursday 5 March 2020 at 7.00 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 David Reeve (Chair)
Councillor Clive Woodbridge (Vice-Chair)
Councillor Monica Coleman
Councillor Neil Dallen
Councillor Chris Frost

Councillor Liz Frost
Councillor Rob Geleit
Councillor Lucie McIntyre
Councillor Julie Morris
Councillor Humphrey Reynolds

Yours sincerely



Chief Executive

For further information, please contact Democratic Services, tel: 01372 732121 or email: democraticservices@epsom-ewell.gov.uk

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Written questions must be submitted to the Council's Chief Legal Officer, who can be contacted via the following email address: Democraticservices@epsom-ewell.gov.uk. The written question must arrive by noon on the tenth working day before the day of the meeting. For example, for a meeting on a Tuesday, the request must therefore arrive by noon on the Tuesday two weeks before the meeting.

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 Servicers 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 5 - 12)

The Committee is asked to confirm as a true record the Minutes of the Meeting of the Committee held on 23 January 2020 (attached) and to authorise the Chairman to sign them.

4. DUTY TO CO-OPERATE - RESPONSE TO ELMBRIDGE BC AND MOLE VALLEY DC LOCAL PLAN CONSULTATIONS (Pages 13 - 24)

Elmbridge Borough Council (EBC) and Mole Valley District Council (MVDC) are currently holding public consultations on their emerging Local Plans. The consultations provide an opportunity for all to make comments on their emerging Local Plans. It is important that Epsom & Ewell Borough Council make comments and raise any particular strategic cross boundary issues with the relevant authorities.

A response has been drafted to the respective authority's consultation document. This report summarises the contents of the consultation and sets out draft responses.

5. EPSOM & EWELL LOCAL PLAN - OVERVIEW OF PROPOSED HOUSING STRATEGY (Pages 25 - 32)

This Report seeks to provide the Committee with an advance overview of the proposed Housing Strategy, which will form a key part of the forthcoming public consultation on the emerging new Local Plan.

6. EPSOM & EWELL LOCAL PLAN - OVERVIEW OF PROPOSED INFRASTRUCTURE STRATEGIES (Pages 33 - 40)

This Report seeks to provide the Committee with an advance overview of the proposed Strategies relating to new infrastructure, which will form a key part of the forthcoming public consultation on the emerging new Local Plan.

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**Minutes of the Meeting of the LICENSING AND PLANNING POLICY COMMITTEE
held on 23 January 2020**

PRESENT -

Councillor David Reeve (Chair); Councillor Clive Woodbridge (Vice-Chair); Councillors Neil Dallen, Liz Frost (from 7.25pm), Rob Geleit, David Gulland (as nominated substitute for Councillor Julie Morris), Steven McCormick (as nominated substitute for Councillor Chris Frost), Lucie McIntyre and Humphrey Reynolds

In Attendance: Councillor Bernie Muir

Absent: Councillor Monica Coleman, Councillor Chris Frost and Councillor Julie Morris

Officers present: Amardip Healy (Chief Legal Officer), Ruth Ormella (Head of Planning), Karol Jakubczyk (Planning Policy Manager) and Sandra Dessent (Committee Administrator)

22 QUESTION TIME

No questions were submitted by members of the public

23 DECLARATIONS OF INTEREST

The following declarations were made:

Declarations of Interest

Councillor Lucie McIntyre, Other Interest: Declared she was a member of the Epsom & Walton Downs Conservators and TGMB (Training Ground Management Board).

Declarations of Interest

Councillor Neil Dallen, Other Interest: Declared he was a member of the Civic Society and TGMB (Training Grounds Management Board).

Declarations of Interest

Councillor Steven McCormick, Other Interest: Declared he was a member of Epsom Civic Society, Epsom & Ewell Tree Advisory Board, Woodcote (Epsom) Residents Society, Epsom & Walton Downs Conservators and the TGMB (Training Grounds Management Board)

24 MINUTES OF PREVIOUS MEETING

The Minutes of the meeting of the Licensing and Planning Policy Committee held on 14 November 2019 were agreed and signed by the Chair as a true record.

25 ANNUAL MONITORING REPORT 2018-2019

The Committee received the AMR (Annual Monitoring Report) for the reporting period 1 April 2018 to 31 March 2019 which is the principal means of monitoring the performance and implementation of the Local Plan, and is fundamental to providing a sound factual basis for decision-making and plan preparation.

It was reported that 165 additional homes had been completed during the plan period, equating to 28% of the Borough's objectively assessed housing need. It was noted that Epsom & Ewell have a 1.14 year supply of housing and the housing trajectory predicted a housing shortfall of 8,484 over the period 2017 – 2037

It was further noted that performance in other areas remained strong i.e. Green Belt and Design Policies.

The following points were raised by the Committee:

- Officers clarified that parking free developments identified in the report were such as they were well located in terms of access to public transport, other sustainable travel modes, services, facilities and amenities. It was suggested for future AMRs that the methods for monitoring Parking Standards be reviewed.
- It was agreed to amend the details for Global House to reflect its use as an office. (page 33 under Plan E site allocations)

Having considered the AMR the Committee noted the contents.

26 HOUSING DELIVERY TEST 2019

The Housing Delivery Test is an annual assessment by the Government setting out the performance of the local planning authorities in delivering their identified need over the previous three years.

Whilst the actual results were yet to be published, the Committee noted that the anticipated outcome was a further deterioration in performance from 22nd to 13th worst achieving Borough nationwide.

The first test results, in 2018, had reported that 57% of the Borough's housing need had been delivered which resulted in the preparation of an Action Plan and the imposition of a 20% buffer. As it was improbable that performance would improve the further penalty of presumption in favour of sustainable development was likely.

Accordingly, the Committee noted the forecasted result for Epsom & Ewell in the government's forthcoming Housing Delivery Test 2019 and the implications for the local planning authority's plan-making and decision making process.

27 LOCAL PLAN DESIGN POLICIES

The Committee received a report setting out the extent of proposed design policies for the new Local Plan, and the need for planning balance to be exercised when determining planning applications.

Officers restated the conclusion of the Licensing & Planning Policy Committee in May 2018 i.e. the decision to acknowledge the National Planning Policy Framework (NPPF) and the local considerations of housing need alongside the consequential need to optimise use of the land. It was agreed that due weight would be given to these matters when assessing proposals against current policies.

Members raised the following points and suggestions:

- It was agreed to circulate the three annexes attached to the report to the Planning Committee to inform their decision making
- Additional training to be provided for Members, details of which would be circulated by the Head of Planning
- It was emphasised that the design guidance could be used to support the Council's adopted policies

Having considered the National Design guidance the Committee:

- (1) Noted the publication of the National Design Guidance and associated 10 characteristics which are used when assessing and determining planning applications
- (2) Agreed the key areas of focus of proposed policies being prepared for Regulation 18 consultation for the draft Local Plan as set out in paragraph 3.7 of the report.

28 BIODIVERSITY: LOCAL PLAN BACKGROUND PAPER

A Local Plan background paper regarding Biodiversity had been prepared detailing the biodiversity of the Borough including Sites of Specific Scientific Interest (SSSI); Non-statutory designations; Ancient Woodlands and Sites of Nature Conservation Importance (SNCI's). Biodiversity Opportunity Areas (BOA's) in the borough were also identified.

It was noted that biodiversity makes a positive contribution towards the Borough's visual character and appearance, and in terms of mitigating the adverse impacts of climate change.

The following points and suggestions were made:

- It was agreed to incorporate related issues of climate change, and health and wellbeing into the background paper

- It was noted (Page 212 Paragraph 5.1) that some of the Borough's open spaces were already at risk from overuse. Without extending areas of biodiversity or increasing the capacity of those open spaces that act as buffers (to protected sites/habitats) there was a risk that future growth would have an adverse impact in the borough's biodiversity. It was agreed that paragraph 5.1 be amended to reflect this.

The Committee recognised the amount of work that had gone into compiling the biodiversity information and thanked them for such a thorough and informative report.

The Committee:

- (1) Noted the content of the Biodiversity Background paper attached at Annex 1
- (2) Endorsed the approach as set out in section 8.0 of Annex 1 for the preparation of the Local Plan, subject to amendments agreed in the meeting.

29 LOCAL PLAN EVIDENCE BASE: SPATIAL ECONOMIC DEVELOPMENT STRATEGY

The Committee received the Draft Spatial Economic Development Strategy, a technical study commissioned by the Council to inform the emerging new Local Plan on the provision of employment to meet the economic growth opportunities and options.

It was conveyed that overall the Borough was a great place to do business especially for entrepreneurs, start-ups and young businesses.

Sustaining the conditions that maintained and enhanced the Borough's local economy was reported as a key objective for the Local Plan and an important part of preparing the borough-wide growth strategy.

The Strategy aimed to identify solutions for the provision of employment space to meet the borough's needs for economic growth and change within the plan period. It also identified possible interventions, local plan policy changes and approaches required to deliver the solutions.

The following amendments were agreed:

- Page 249, paragraph 6.1.1 should read 'In order to **strengthen** the borough's longer term economic prospects...'
- Page 253, project no. 4 – It was agreed to provide additional detail and clarity to the text relating to 'Scope' – Epsom & Ewell Walking and Cycle Network to highlight the specific objective to improve the connectivity of the sustainable travel networks linking Kiln Lane and Longmead Employment sites.

The Committee:

- (1) Noted the contents of the Spatial Economic Development Strategy 2020 as a technical study that will form part of the evidence based for the emerging new Local Plan
- (2) Authorised the Head of Planning to amend the strategy in line with the suggestions made in the meeting (above).

30 RACE TRAINING & EQUESTRIAN INDUSTRY: LOCAL PLAN BACKGROUND PAPER

With Epsom being the home of the Derby the racecourse and equestrian sector have long been recognised as a key part of the identity of the Borough and to that end the Council had commissioned a Scoping report on the Racecourse and Equestrian sector which would be used to form part of the evidence base for the new Local Plan.

The Scoping report identified interventions that could form the basis of enabling policies for the new Local plan including:

- Establishing a racing or recreation area
- Enabling investment into the racecourse
- Key workers accommodation
- Capital investment and enabling development
- Inward investment into the sector
- Growing the visitor economy
- Building on Epsom 'Home of the Derby'

The following amendments and suggestions were made:

- Page 272 paragraph 6.2 – suggest amending the heading of the paragraph to read, '**Investment in** the Racehorse Training Sector'
- Page 273 paragraph 8.1 – suggest amending heading to read '**Equine Training** and Racing Zone'. It was also suggested that the Background Paper include an additional reference to the proposals for an Enterprise Zone as set out in the Spatial Economic Development Strategy
- Page 274 paragraph 8.2 – It was agreed to explore the Jockey Club's utilisation of the Conference Centre outside of racing fixtures and amend the paragraph if considered applicable

- Page 275 paragraph 8.6 – amend paragraph cross-reference from 7.4 to 8.5

The Committee welcomed and acknowledged the report which identified the huge potential for working with the racing industry.

Accordingly, the Committee noted the contents of the Scoping Report on the Racecourse & Equestrian Sector as a technical study that will form part of the evidence base for the emerging new Local Plan.

31 LOCAL PLAN EVIDENCE BASE: RETAIL NEEDS ASSESSMENT AND TOWN CENTRES HEALTH CHECKS

The Committee received the Draft Borough-wide Retail Needs Assessment and Town Centres' Health Checks a technical study commissioned by the Council to inform the new emerging Local Plan.

The study stated that there was evidence to demonstrate that Epsom & Ewell was a great place to shop and the retail centres provided a focus for the different communities across the Borough. It was highlighted that sustaining the conditions that maintain and enhance the borough's retail centres was a key objective for the Local Plan.

The following amendments were suggested and agreed:

- Page 320 – paragraph 5.65 final sentence should read 'The focus should **now** shift to the Church Street/East Street...'
- Page 322 final bullet point to read Church **Street**
- Page 358 Recommendations for Epsom Town Centre – clarification required as to how the primary retail frontage will be measured

Accordingly, the Committee noted the contents of the Draft Borough-wide Retail Needs Assessment and Town Centres' Health Checks as a technical study that will form part of the evidence base for the emerging new Local Plan, subject to minor amendments agreed at the meeting.

32 REVISED LOCAL PLAN PROGRAMME

The Committee received a revised Local Plan programme setting out the processes and timetable for the new Local Plan.

The key milestones included:

Spring 2020 – *Final Issues and Options Consultation (Regulation 18 Part2)*

Summer 2021 – *Pre submission Public Consultation*

Autumn 2021 – *Submission to the Secretary of State*

Winter 2021 – *Public Hearing*

Autumn 2022 – *Estimated date of adoption*

The following amendment was agreed:

- Page 404 paragraph 5.65 first sentence should read ‘In parallel to our new Local Plan ***we have prepared*** a Masterplan for Epsom & Ewell...’

The potential for future judicial reviews was discussed and it was agreed that any relevant articles/papers outlining recent judicial reviews of Local Plans (in Surrey Guildford or Waverley) would be circulated to Members.

The evolution of Duty to Cooperate was explained and the requirement that neighbouring authorities will be obliged to adopt agreed strategies to address key issues. The Council should be able to demonstrate clearly how they will work collectively with their neighbours to address unmet housing need.

Members requested that that sufficient staffing resources be made available to ensure the Local Plan meets its delivery timetable.

The Committee considered and approved the draft Local Plan Programme January 2020.

33 VOTE OF THANKS

It was announced that this was the final meeting for Sandra Dessent – Democratic Services Officer. The Committee thanked her for her support and hard work administering the Committee and wished her all the best for the future.

The meeting began at 7.00 pm and ended at 9.20 pm

COUNCILLOR DAVID REEVE (CHAIR)

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DUTY TO CO-OPERATE - RESPONSE TO ELMBRIDGE BC AND MOLE VALLEY DC LOCAL PLAN CONSULTATIONS

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

Urgent Decision?(yes/no)

If yes, reason urgent decision required:

Annexes/Appendices (attached): Annex 1; Draft response to Elmbridge BC
Annex 2: Draft response to Mole Valley DC

Other available papers (not attached):

Report summary

Elmbridge Borough Council (EBC) and Mole Valley District Council (MVDC) are currently holding public consultations on their emerging Local Plans. The consultations provide an opportunity for all to make comments on their emerging Local Plans. It is important that Epsom & Ewell Borough Council make comments and raise any particular strategic cross boundary issues with the relevant authorities.

A response has been drafted to the respective authority's consultation document. This report summarises the contents of the consultation and sets out draft responses.

Recommendation (s)

The Committee considers the proposed draft responses and subject to any changes or additions agrees the submission to the respective authority's consultation.

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

- 1.1 As part of Plan Making process, strategic policy making authorities are required to cooperate with each other on the preparation of policies on strategic matter. Epsom and Ewell will be fulfilling that duty in responding to the formal consultations of Elmbridge Borough Council (EBC) and Mole Valley District Council (MVDC) emerging Local Plan consultations.

- 1.2 It is expected that these authorities will make responses to the emerging Epsom and Ewell Local Plan in due course.

2 Background

- 2.1 As part of the Plan Making process, Strategic Planning authorities are required¹ to cooperate with each other and identify relevant strategic matters. Plans need to be shaped by early, proportionate and effective engagement with a range of stakeholders including plan makers, local residents, businesses, and infrastructure providers.
- 2.2 As Local Plans progress to the final stages, authorities will be required to detail the cooperation in a statement of common ground.
- 2.3 EBC are currently holding a public consultation on their vision and objectives for their emerging plan. The consultation is due to close on the 9 March 2020. MVDC are also consulting on their draft Local Plan and this is due to close on 23 March.

3 Proposals

Elmbridge Borough Council

- 3.1 EBC are currently consulting on their visions and objectives for their local plan and development management policies. The consultation is titled '[Creating our vision, objectives and the direction for development management policies 2020](#)'. Representations on the documents are being accepted between 27 January 2020 until 9 March 2020.
- 3.2 The current consultation is part of a number of consultations EBC have held on their emerging Plan, the chronology is set out in one of their supporting documents published alongside this consultation.
- 3.3 The formal stage the consultation falls under is Regulation 18 in The Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.4 The Consultation sets out three key themes under which there are five objectives. The themes and objectives are:

Themes:

- Our natural environment
- Growing a prosperous economy
- Ensuring health and wellbeing for all

¹ This forms part of the tests of soundness, as set out under National Planning Policy Framework Paragraph 35.

Objectives:

- Deliver sustainable development and vibrant places that are excellently designed to achieve a better quality of life, a prosperous economy and a healthy built and natural environment for the benefit of existing residents and future generations.
 - To adapt to, and mitigate, the effects of climate change; to reduce carbon dioxide emissions, minimise energy use; improve air quality and protect and enhance our natural environment.
 - To provide the environment and opportunities to foster a prosperous economy with modern, flexible and well-connected workspaces where industries and businesses can thrive. Where our locally distinctive centres offer a vibrant place to live, work and socialise, continuing to be the heart of our communities.
 - To deliver quality homes for all to create inclusive communities, promoting healthy lifestyles and positively contribute to the physical and mental health and wellbeing of those that live, work and visit the borough.
 - Ensure the delivery of the right infrastructure in the right place and at the right time to support growth.
- 3.5 The consultation is generally high level, seeking views on the themes and objectives. Whilst it sets out the general principles their policies may take, the detail behind their policy proposals and options is largely absent. It is assumed that there will be further consultation at a later stage. EBC have indicated this will form part of their Regulation 19 consultation.
- 3.6 The Borough Council has prepared a draft response that reflects the high level nature of the consultation, which as a consequence does not have any specific comments to make regarding the themes and objectives. However, given that this may be the last opportunity to comment on their emerging Local Plan before it is drafted and published for Regulation 19 consultation, it is considered important for the Borough Council to formally set out that it will not be able to meet any of Elmbridge's unmet objectively assessed housing need (OAHN).
- 3.7 The Borough Council's draft response is set out in Annex 1

Mole Valley District Council

- 3.8 MVDC are currently consulting on their draft Local Plan. The consultation is titled '[Future Mole Valley \(Local Plan 2018-2033\)](#)'. Representations on the documents are being accepted between 3 February 2020 until 23 March 2020.

- 3.9 The consultation is on their proposed draft Local Plan. The formal stage the consultation falls under is Regulation 18 in The Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.10 The document sets out MVDC's spatial strategy, policies and proposed site allocations- structured in that order within the document. The policies are divided into different categories Housing, Economy, Environment and Infrastructure. Published alongside the draft Local Plan is the Policies Map which illustrates the proposed policies spatially on an Ordnance Survey map.
- 3.11 The consultation is on their draft Local Plan. Overall, it is a comprehensive document that sets out its growth strategy and policies clearly. MVDC are committing to meeting the housing need for their area in full and have set out the distribution of these in the sites being proposed for allocation. There are a few sites proposed for allocation close to the Borough boundary. These include SA04 Marsden Nurseries, Pleasure Pit Road and SA01 and SA02 Land South of Ermyn Way and Ermyn House. Our draft response draws attention to these sites and includes relevant comments.
- 3.12 In particular, it is highlighted that their proposed housing development densities are generally low. It is also noted that their draft Local Plan housing trajectory appears to suggest that housing delivery would result in Mole Valley exceeding their OAHN – if all of their proposed site allocations came forward during their Plan period at their identified development yields. Given our spatial relationship with Mole Valley and the constraints to housing land supply present in Epsom & Ewell, it is suggested that the Borough Council explore this matter further with MVDC.
- 3.13 The consultation is advertised as Regulation 18. Comments received at this stage will inform whether any revisions to the draft Local Plan will be needed to be published for Regulation 19 consultation before it is submitted for independent Examination.
- 3.14 The Borough Council's draft response is set out in Annex 2.

4 Financial and Manpower Implications

- 4.1 Responding to other authorities Local Plan consultations on cross boundary issues is a requirement of the Duty to Cooperate. Responses are resourced through the Planning Policy Team.
- 4.2 ***Chief Finance Officer's comments:*** none for the purposes of this report.

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

- 5.1 Strategic policy-making authorities are required to cooperate with each other (and other bodies) when preparing policies which address strategic matters.

- 5.2 Local Plans are examined to assess whether they are prepared in accordance with legal and procedural requirement and whether they are sound. The test of soundness include whether it has been: *positively prepared; justified, effective and consistent with national policy*.

- 5.3 **Monitoring Officer's comments:** *none arising from the contents of this report.*

6 Sustainability Policy and Community Safety Implications

- 6.1 Local Plans are required to achieve sustainable development through the three overarching objectives of economic, social and environmental². Plans are required to be supported by Sustainability Appraisals

7 Partnerships

- 7.1 As part of the Plan Making process, Strategic Planning authorities are required to cooperate with each other and identify relevant strategic matters and will be required to detail the cooperation in a statement of common ground.

8 Risk Assessment

- 8.1 As part of the Plan Making process, Strategic Planning authorities are required to cooperate with each other and identify relevant strategic matters. Failure to demonstrate this could result in Local Plans being unsound.

9 Conclusion and Recommendations

- 9.1 The Committee is asked to review the proposed draft responses and subject to any changes and additions agree their submission to the respective consultations.

Ward(s) affected: (All Wards);

² These are set out National Planning Policy Framework Paragraph 8.

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Elmbridge BC's 'Creating our vision, objectives and the direction for development management policies 2020'
Consultation. 27 January to 9 March

Draft response

Epsom & Ewell Borough Council welcomes the opportunity to comment on Elmbridge Borough Council's consultation "Creating our vision, objectives and the direction for development management policies 2020", which will inform your draft local plan. The Borough Council is aware that Elmbridge Borough Council has previously held a number of consultations on its emerging plan. The Borough Council notes that it has made representations to those consultations at their appropriate periods of engagement.

Overall the Borough Council has no particular comments to make in relation to the themes and objectives set out in the latest consultation document. The identified themes appear to be consistent with national planning policy and the objectives of achieving sustainable development. The Borough Council will support neighbours with draft Local Plan's that demonstrably meet the four tests of soundness.

However, the Borough Council notes that the scope and contents of the current consultation is rather broad. Notably the current consultation does not offer a preferred approach or strategy for delivering future growth. In that respect it would be helpful for us to understand what Elmbridge's preferred approach towards future growth will be. In its absence we are not currently able to comment constructively on any strategic cross boundary issues. This may present a problem for your Local Plan process should you wish to proceed directly to the pre-submission consultation under Regulation 19.

The paper published alongside this consultation 'Useful Summary: Plan preparation to date' is a helpful chronology of the plan preparation to date. However, it implies that this may be the last consultation period before Elmbridge Borough Council publishes its "Draft Plan" for pre-submission consultation. We respectfully question whether this will allow for sufficient time to address strategic cross boundary issues. This is a matter for yourselves to consider.

Whilst Elmbridge's preferred growth strategy is not the subject of your current consultation, in the context of your outlined timetable, it is important that Elmbridge Borough Council are fully aware that Epsom & Ewell does not have the capacity to accommodate any additional housing need that cannot be met within your Borough. You will appreciate that the Borough Council is currently working on its own new Local Plan. Our evidence demonstrates that meeting our own objectively assessed housing need (set by the national standard method) will be challenging and as such supporting our neighbours by meeting any of their external unmet need is not a deliverable option.

Nevertheless, we will continue to positively engage and welcome future opportunities to work with Elmbridge Borough Council on strategic cross

boundary issues either during a formal consultation period or directly, as part of our ongoing duty to cooperate. Please keep the Borough Council informed on the progress being made on your new Local Plan and any other consultations that are important for strategic cross boundary working.

Mole Valley Consultation (Local Plan 2018-2033)

3 February and 23 March 2020.

Draft response

Epsom & Ewell Borough Council thanks Mole Valley for the opportunity to comment on your emerging Local Plan 'Future Mole Valley 2018-2033'. The Borough Council is an adjoining authority to Mole Valley and therefore it is a requirement that we positively engage and cooperate on cross boundary issues. We have reviewed your draft Plan and have the following comments:

- i) We have no specific comments in relation to your draft policies. The overall structure and policy approaches appear to be logical and broadly consistent with national planning policy and the objectives of achieving sustainable development.
- ii) On the basis of your proposals under **S2 Strategy 2, we understand** that Mole Valley District Council intends on meeting its objectively assessed housing need in full by taking a 'brownfield first' approach. The Borough Council supports this proposed approach and would emphasise the need to make effective use of land as required by national planning policy.
- iii) However, we note that upon reviewing your proposed sites allocation that the overall densities appear fairly low; with an average housing development density of around 24 dwellings per hectare. Within the context of national policy and the limited land availability (across Mole Valley District) this may be considered an inefficient, or ineffective use of land. We suggest that it may be necessary to provide further justification for the development densities that you have proposed.
- iv) It is also noted that some of the proposed housing site allocations are very modest in scale and yield – identifying potential development sites of only one or two houses. We suggest that you review whether it is necessary to allocate sites of such modest size or whether treat them as "identified" sources of windfall supply.
- v) We note that you have a summarised housing trajectory included under Appendix 6. We believe that it would be helpful, both for your own and for strategic purposes, to have a more detailed housing trajectory in the subsequent version of your plan.
- vi) It is also noted that the Housing Trajectory included under Appendix 6 projects the delivery of a total of 7,827 new additional houses during the plan period. We note that this could amount to an additional 16% above Mole Valley's identified minimum objectively assessed housing need. The Mole Valley SHELAA 2020 indicates that this total does not include windfalls. On that basis we suggest that the inclusion of windfall supply could increase the scale of projected delivery by a further 2% to 18% above the minimum housing need. Bearing this in mind and the comments made above regarding densities, there is a possibility that Mole Valley could help meet some of the unmet housing need generated from those adjoining authorities that have a genuine spatial

relationship with the District. The Borough Council welcomes the opportunity to discuss this further with Mole Valley. There are potential incentives for such discussions – notably in respect of infrastructure investment and economic development.

With regards to proposed site allocations, the following comments are made:

SA04 Marsden Nurseries, Pleasure Pit Road, Ashtead

The site lies adjacent to the south-western edge of the Epsom and Ewell Borough administrative boundary. It is an operating nursery site (Ashtead Garden Centre) located within the Green Belt and a sensitive location. It is within a Conservation Area and in the vicinity of statutory listed buildings. The loss of the existing garden centre would presumably be a further material planning consideration.

The Borough Council has previously objected to specific proposals on the site due to the harmful impact on the openness of the Green Belt. Although it is understood that Mole Valley District Council intends to remove it from the Green Belt boundary as part of the Local Plan process. The Borough Council directs Mole Valley to the two Green Belt Studies prepared and produced in support of the emerging new Epsom & Ewell Local Plan. The Marsden Nurseries site is identified as being located immediately adjacent to Parcels 12 and 13 within the two Green Belt Studies. These parcels score a moderate to high score against the main purposes of the Green Belt. Mole Valley District Council will be aware of National Planning Policy Paragraph 136, which states that Green Belt boundaries should only be altered in exceptional circumstances when updating plans. Furthermore Paragraphs 137-138 of the Framework emphasise that all reasonable options for meeting the identified objectively assessed need on brownfield land and through optimising density in locations well served by public transport must be explored before Green Belt is released. We take this opportunity to restate these points in relation to this proposed site allocation and suggest that there will be a harmful impact to the openness of wider Green Belt.

SA01 Land South of Ermyn Way and SA02 Ermyn House, Ashtead

These two sites lie adjacent to each other to the south of Ashtead.

SA01 falls within the Green Belt. The proposed site allocation seeks the development of the land for 250 dwellings, two gypsy and traveller pitches and open space. It is proposed that the land be removed from the Green Belt.

SA02 Ermyn House, Ashtead is an existing industrial estate which lies on the edge of the settlement, outside of the Green Belt boundary. The site is currently safeguarded for industrial and commercial purposes. The proposed allocation is for mixed use development including 200 dwellings, two gypsy and traveller pitches and reduced office space.

It is noted that the site is no longer being safeguarded for employment uses and Mole Valley District Council will need to ensure that their evidence supports reduced employment provision in this location.

In respect of possible harmful impacts on (the neighbouring) Epsom & Ewell Borough; the scale of development on these two sites has the potential to impact one of the key A roads (the A24) that serves the Borough. We suggest that the traffic impacts need to be fully assessed; both alone and in combination with Epsom & Ewell's growth strategy. Appropriate mitigation measures will need to be incorporated where necessary. This may involve further cross boundary engagement through the Duty to Cooperate.

Epsom & Ewell Borough Council will continue to positively engage and welcome future opportunities to work with Mole Valley District Council on strategic cross boundary issues. Please keep us informed on the progress being made on your Local Plan and any other consultations that are important for cross boundary working.

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EPSOM & EWELL LOCAL PLAN - OVERVIEW OF PROPOSED HOUSING STRATEGY

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

Urgent Decision?(yes/no) No

If yes, reason urgent decision required:

Annexes/Appendices (attached):

Other available papers (not attached): [L&PPC 14 November 2019 Item 5: Local Plan – Growth and Housing Strategy](#)

Report summary

This Report seeks to provide the Committee with an advance overview of the proposed Housing Strategy, which will form a key part of the forthcoming public consultation on the emerging new Local Plan.

Recommendation (s)

That the Committee:

- (1) Notes the overview content of the proposed Housing Strategy; and**
- (2) Subject to any changes endorses the Strategy approach that will be used in the preparation of the Local Plan Regulation 18 public consultation.**

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.
- 1.2 The emerging new Local Plan will include a Borough-wide Housing Strategy.

2 Background

- 2.1 The emerging new Local Plan will comprise strategies, planning policies and site allocations. It will present a hierarchy of strategies, starting with a Borough-wide Growth Strategy, and then expanding to cover key areas that will include – housing; employment; retail; and infrastructure. These strategies are proposed to be delivered through the combination of planning policies and site allocations.
- 2.2 The latest Local Plan Programme (January 2020) includes public consultation on the emerging new Local Plan under Regulation 18¹ during late Spring until early Summer 2020. It is envisaged that the draft Consultation Paper will come before the Committee during April 2020. This Report seeks to provide the Committee with an initial overview of the proposed Housing Strategy.
- 2.3 During November 2019 the Committee received a Report on six principles that set the strategic direction of the emerging new Local Plan's growth strategy. That Report detailed the implications of national planning policy; specifically in relation to the scale of the Borough's objectively assessed housing need (OAHN).
- 2.4 National planning policy requires that Local Plans include an appropriate strategy for meeting the demands of future growth. New Local Plans are examined in order to assess whether they have been prepared in accordance with legal and procedural requirements – specifically to determine whether they (and their strategies, policies and site allocations) are sound. New plans are found sound if they meet the four tests² of soundness as set out by national planning policy. A key test of soundness is that new Local Plans provide a strategy that as a minimum seeks to meet an area's OAHN. The proposed Housing Strategy aims to meet the tests of soundness.
- 2.5 National planning policy and guidance also sets out the mechanism by which all local planning authorities must use in order to identify their OAHN. The standard method has identified an OAHN for Epsom & Ewell of at least 579 new additional homes per annum. This amounts to a total of 11,580 new additional homes to be delivered during the Local Plan period (2017 – 2037).

¹ Of the Town & Country Planning Regulations.

² The four tests of soundness are set out in the National Planning Policy Framework under Paragraph 35. The tests of soundness require that local plans are 1) **Positively** prepared and as a minimum meet an area's objectively assessed needs; 2) **Justified**, identifying an appropriate strategy for growth; 3) **Effective**, being deliverable over the plan period and demonstrating joint working on strategic issues; and 4) **Consistent with national policy**,

- 2.6 In addition to the above requirements, national planning policy also requires new local plans set out and identify conditions to secure the delivery of at least five years' supply of housing. For clarity, in order to meet the test of soundness it is not enough for local planning authorities to simply identify a portfolio of sites that meet the OAHN. That portfolio of sites must also be available, deliverable and developable with the objective of securing a steady stream of housing that at the least equals five years of supply.
- 2.7 There is no evidence to demonstrate that local planning authorities submitting local plans for examination that do not meet at least their identified OAHN or secure a five year housing land supply are found to be acceptable. In all cases, such plans have either been found unsound – with the authorities being required to withdraw their proposals or subject them to major modifications; in order for their plans to be found sound.
- 2.8 The Borough Council's proposed approach to the Housing Strategy is based on and informed by a wide variety of technical evidence studies, which have already come before the Committee for consideration. These include the Strategic Housing Market Assessment (September 2019); the Strategic Housing Land Availability Assessment (June 2017); and the draft Epsom & Ewell Masterplan (September 2019). Other technical evidence that has been used to inform the proposed Strategy is included under the Local Plan Evidence Base.
- 2.9 The Strategy has also been informed by previous public consultation . The comments that have been made to date have indicated that a spatial approach that optimises the growth and housing potential of the Borough's existing urban area is favoured by those that have responded. The details of previous public consultations, summaries of responses and subsequent reports are published on our website.

3 Proposal

The Proposed Strategy

- 3.1 The proposed new approach to the Housing Strategy will replace the existing Core Strategy Policy CS7 Housing Provision and Policy CS8 Broad Locations for Housing Development. It will set out the scale and nature of future housing demand and how we will seek to meet those challenges. It will set out how many new additional homes we propose to deliver during the Plan period. It will identify sustainable and appropriate locations to meet that demand. The Strategy will apportion how many new homes will be delivered at these locations and sites. For example, it will clearly state how new homes will be delivered in Epsom Town Centre. The scale of housing that could be delivered on these locations will be informed by the forthcoming Regulation 18 public consultation.

- 3.2 The Strategy is driven by a number of objectives. The first being that it will respond positively to the challenge of our OAHN, as identified and required by the Government. By identifying appropriate and sustainable locations and sites for future housing the Strategy will seek to deliver at least 579 new additional homes per annum during the Local Plan period. As stated above, the key aspect of this part of the Strategy will be to demonstrate that these locations and sites will secure at least a five year supply of new additional homes. The Strategy will clearly signal the locations and sites that are anticipated to come forward early in the Plan period in order to contribute towards securing five year housing land supply.
- 3.3 The above will be achieved through the comprehensive change of highly accessible and sustainable locations and sites across the Borough. This approach will prioritise and optimise potential sources of housing supply located within the existing urban area; as informed by the previous Issues & Options Consultation during 2017. These are Epsom Town Centre; the other local centres; around the railway stations; transport corridors; and other sustainable locations identified within the existing urban area. This part of the Strategy is supported by evidence from a variety of sources most notably that contained within the draft Epsom & Ewell Masterplan. This approach reflects the six agreed principles that provide the strategic direction for the emerging new Local Plan's growth strategy.
- 3.4 The proposed Strategy will also set out the other planning policies that will guide future housing development. These policies will cover key issues including design quality, building height, the intensity of development and green infrastructure. This approach reflects the six agreed principles.
- 3.5 The proposed Strategy is positive about the prospect of securing good quality sustainable housing growth through the optimisation of locations and sites within the existing urban area. However, the Strategy acknowledges that our evidence suggests that in spite of this optimism there is a risk that our new Local Plan will be unable to demonstrate at least a five year supply of housing. Consequently, the Strategy reluctantly concedes that the new Local Plan will have to consider the release of a small number of large sites located in the Green Belt in order to satisfy the Government's planning policy requirements.
- 3.6 The Strategy will seek to optimise the value of any large sites being released from the Green Belt so that schools, healthcare, employment, shopping, green infrastructure, open spaces and transport infrastructure are integral and planned for along with housing. By taking this approach the development on these sites will make a positive contribution to the changes taking place across the whole borough.

- 3.7 Although we are being required to concentrate the direction of our new policies to meet the OAHN identified by the Government, our proposed Strategy is ultimately positive in securing wider goals. The future new homes being built will come with a proportionate level of infrastructure investment that the Borough needs. This will include greener environments, with more trees and open spaces within the townscape. Well designed new housing will be supported by new and improved sustainable transport networks that will not only enable residents to live full and healthy lifestyles but will also provide them with genuine alternatives to having to travel by car. The Borough will be a place that continues to be attractive to a wide range of people.
- 3.8 The Strategy will be supported by a key diagram that identifies the locations and sites that will collectively come forward to meet the Borough's needs. The forthcoming consultation paper will provide the public with an opportunity to comment on the soundness of the proposed strategy.

4 Financial and Manpower Implications

- 4.1 The proposed Housing strategy has been prepared by the Planning Policy Team. This work has also been informed by technical evidence prepared in support of the emerging new Local Plan.
- 4.2 **Chief Finance Officer's comments:** none for the purposes of this report.

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

- 5.1 National planning policy requires that new Local Plans include strategic policies that set out the pattern, scale and quality of development, making sufficient provision for new growth, necessary supporting infrastructure, community facilities and the natural and built environment. Subject to agreement the proposed Housing Strategy will be included in the new Local Plan.
- 5.2 New Local Plans are required to meet the tests of soundness. This means that as minimum they meet the identified OAHN. The Housing Strategy will need to demonstrate how our OAHN will be met. A strategy that results in unmet OAHN will need to demonstrate how any unmet housing will be delivered.
- 5.3 The policies within local plans also need to meet the test of being justified in terms of the evidence used to support their introduction and that reasonable alternatives have been considered. Should the Borough Council find itself considering more than one justifiable growth strategy, it will need to ensure that its preferred approach is defensible.

- 5.4 When preparing growth strategies that look beyond the existing urban areas to deliver housing, local planning authorities are required to have first considered all opportunities available within existing urban areas and on previously developed land. The Borough Council can demonstrate that it has met this requirement through a sequential evidence approach that includes the SHLAA, the call-for-sites consultation exercise, the urban housing Capacity Study, the Strategic Employment Sites Capacity Study and the draft Epsom and Ewell Masterplan.

- 5.5 ***Monitoring Officer's comments:*** none arising from the contents of this report.

6 Sustainability Policy and Community Safety Implications

- 6.1 The proposed Housing Strategy is subject to the wider Local Plan sustainability appraisal reporting process.

7 Partnerships

- 7.1 Our Local Plan will need to satisfy all of the tests of soundness, including demonstrating that it is effective. Any strategic policies will need to demonstrate a level of broad support from our partners in neighbouring local planning authorities. Engagement with neighbouring authorities will be secured through the on-going duty to cooperate process. This will be evidenced through a statement of common ground between partners.

8 Risk Assessment

- 8.1 The areas of risk which need to be managed with the emerging new Local Plan include:
- the emerging growth strategy will need to be sound so as to meet the requirements of the Secretary of State at examination. The Secretary of State will not identify additional or alternative sites or strategies for us; meeting our OAHN is key to securing a sound Local Plan, the absence of a sound housing strategy could lead to costly delays as modifications and further evidence is produced;
 - our existing evidence base will become dated if delays occur as a result, which could stall the whole process;
 - delays in securing a five year housing land supply will have the potential for the Borough to not be plan led, rather planning application and appeal led;
 - reputational damage from having an unsound Local Plan may have far reaching consequences;
 - not all growth strategies deliver the infrastructure that the Borough needs.

9 Conclusion and Recommendations

- 9.1 The Committee are asked to note the content of the proposed Housing Strategy.
- 9.2 Subject to any changes the Committee endorses the proposed Strategy approach to be taken forward in the preparation of the Local Plan Regulation 18 public consultation.

Ward(s) affected: (All Wards);

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EPSOM & EWELL LOCAL PLAN - OVERVIEW OF PROPOSED INFRASTRUCTURE STRATEGIES

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

Urgent Decision?(yes/no) No

If yes, reason urgent decision required:

Annexes/Appendices (attached):

Other available papers (not attached): Epsom & Ewell Local Plan: Other Sites Pre-Submission Draft (Winter 2015/16)

Report summary

This Report seeks to provide the Committee with an advance overview of the proposed Strategies relating to new infrastructure, which will form a key part of the forthcoming public consultation on the emerging new Local Plan.

Recommendation (s)

That the Committee:

- (1) Notes the content of the proposed Strategies relating to new infrastructure; and**
- (2) Subject to any changes endorses them in respect of the preparation of the Local Plan Regulation 18 public consultation.**

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.
- 1.2 The emerging new Local Plan will include a series of Borough-wide strategies relating to the provision of new and enhanced infrastructure that will serve and support the growth taking place during the Plan period.

2 Background

- 2.1 The emerging new Local Plan will be a whole or complete Local Plan. Namely, it will be comprised of strategies, planning policies and site allocations. The proposed Borough-wide Growth Strategy, and the six principles that guide it, was the subject of a Report to the Committee during November 2019. The Committee received Reports on the emerging evidence behind future employment and retail growth during January 2020. The proposed Housing Strategy is the subject of a Report also before the Committee during March 2020.
- 2.2 This Report provides an overview of the infrastructure strategies that will collectively support the planned-for growth in housing, employment and retail during the Plan period (2017 – 2037). These improvements will benefit both our existing residents and communities, in addition to those who will come to live and work in the Borough over the next twenty years. Investment in new and improved infrastructure is a key component of our future growth. These infrastructure improvements will be integrated into future growth and a significant benefit for all.

3 Proposals

- 3.1 It is proposed that the following infrastructure strategies will sit alongside the overall Growth, Housing and Retail strategies in the forthcoming Local Plan Regulation 18 public consultation document.

Green Infrastructure

- 3.2 Green infrastructure can include a wide variety of different assets. This can include our Green Belt; Sites of Special Scientific Interest; Sites of Nature Conservation Interest, Local Nature Reserves; Ancient Woodland; and our parks and open spaces. Green Infrastructure is an essential part of what makes Epsom and Ewell a special and unique place. It not only serves to make the borough look beautiful but it also helps make it a place that is healthy, safe and connected to the natural world. Within the context of the climate emergency, our green infrastructure needs to be protected, enhanced and extended to secure it for our future generations. These new assets will form part of our expanding network and will be identified on the Proposals Map. They will also have appropriate levels of protection from development.
- 3.3 Our new Strategy will replace Core Strategy Policy CS3 Biodiversity and Designated Nature Conservation Areas and Policy CS4 Open Spaces and Green Infrastructure. The new policy is an updated version of the Green Infrastructure Strategy that we have already tested and consulted upon through our Other Sites Pre-Submission Draft during 2015/16.

- 3.4 Our Strategy seeks to secure a green infrastructure network that will provide strong tangible links between those areas that will accommodate future growth. The network will be a key visual characteristic of the borough ensuring the borough evolves as a unified and cohesive place. The links will correspond to direct, identifiable routes on the ground, such as paths, alleyways, bridleways or roads. However, in many parts of the borough (particularly within predominantly residential areas) the links will be less distinct.
- 3.5 Enhancements and additions to the green infrastructure network will be delivered through the new growth that will take place in the areas identified in our Borough-wide Growth Strategy. These will embed green infrastructure in much the same way that transport and utilities have been incorporated in the past. The site specific policies for our strategic sites and the locations that we will identify for positive change, will require the delivery of improvements that will enhance and extend the green infrastructure network. Our emerging Viability Assessment suggests that our approach to Green Infrastructure investment is a viable and cost effective mechanism for securing these improvements across the Borough. It is unlikely that we would be able to achieve these improvements in the absence of growth.

Transport

- 3.6 The ability to travel freely, in order to access homes; jobs; shops; schools and leisure activities, has been an important part of the daily lives of residents and those who work in the Borough. However, it is becoming increasingly apparent that the ways that we choose to travel need to evolve to respond to prominent issues such as our changing climate, deteriorating air quality and mounting congestion. Our emerging new Local Plan Transport Strategy seeks to positively address these issues in order to secure a sustainable future for Borough. Our new strategy will replace Core Strategy Policy CS16 Managing Transport and Travel. It will be supported by a Key Diagram (map) that will identify the opportunities for investment and how they relate to the locations that will accommodate future growth.
- 3.7 The new Strategy will prioritise improvements to rail, bus, cycle and pedestrian networks. It will seek to provide everyone with access to a range of transport options to the places and facilities that they need to travel to locally, which will help provide genuine alternatives to the private car. Over the life of the new Local Plan, this will secure a change in the way people travel. This will secure tangible benefits, improving safety, boosting health and wellbeing and potentially allowing for additional green infrastructure. The strategy will be illustrated through a Transport Key Diagram.

- 3.8 Our evidence shows that many parts of the Borough's existing highway network are at capacity, particularly at pinch points around junctions. No amount of investment in these particular areas is likely to make any difference to the capacity. However, investing in sustainable alternatives provides the opportunity for delivering a genuine choice of transport options.
- 3.9 The new developments that will provide our future growth will promote change, providing and attracting investment into the area. Without them we will not secure the considerable sums of money needed to upgrade our travel networks. Larger sites will have sustainable transport options embedded into them from the outset, with the benefits spreading to the adjoining areas. This shift to more sustainable transport networks will gather momentum throughout the Plan period and beyond.
- 3.10 The prospect of improvements to our railway networks provides a further opportunity for our growth strategy. The Strategy will take advantage of those opportunities to ensure that our railway stations are fully supported and integrated into the sustainable travel networks that link them into our new and existing residential areas, employment areas, retail centres and the wider borough.
- 3.11 Our evidence highlights that congestion on our highway network is having an adverse impact on the Borough's environment and on the personal health of our residents. It is also expensive – in terms of cost to residents (petrol, road tax, insurance and wear and tear) and on our local economy. The Strategy seeks to take account of the advances in technology, artificial intelligence and the changes in car ownership models that will take place during the life of the new Local Plan. Facilitating this evolution that complements the expansion of our sustainable travel networks will have a positive effect that could help free significant parts of the highway network for other uses – for example providing opportunities to further expand and embed Green Infrastructure.

Education

- 3.12 Securing proportionate improvements to our education infrastructure networks is an essential part of planning for future growth. Currently many of our existing schools are at, or near capacity. New provision will be required to meet both future demand and from a historic increase in birth rates.

- 3.13 Our evidence demonstrates that pressure is particularly acute for secondary school place provision. Discussions with the local education authority and with school operators indicate that demand for new school places to be between 3 & 5 forms of entry (FE) at primary level and between 5 & 8 FE at secondary level. However, this is a high-level calculation and the requirements are likely to vary depending on the amount of housing to be delivered, the location of housing sites and the size of housing units delivered. The requirements will be refined as the Local Plan progresses. It is anticipated that there will be greater certainty following the Regulation 18 consultation.
- 3.14 The forthcoming Local Plan Regulation 18 consultation paper will consider a number of options for meeting future growth. These will appear as potential site allocation options, which will either propose new education provision by itself or as part of a wider development opportunity. We anticipate that the Growth Strategy key diagram will identify the location of these options. The possible locations will feature within the site allocation options section of the Regulation 18 consultation paper. Respondents will be invited to comment on the soundness of the proposed options and identify any alternative options for securing improvements to our education infrastructure.

Infrastructure Delivery Plan

- 3.15 In addition to the above, the Borough Council is also in the process of preparing an updated Infrastructure Delivery Plan (IDP) that will sit alongside and complement the emerging new Local Plan. The updated IDP will identify and seek to prioritise specific infrastructure improvement schemes for delivery. For example, it will identify the detail behind specific sustainable transport network improvements – such as new bus, cycle and pedestrian routes. It will also address other areas of infrastructure investment that do not explicitly feature in the Local Plan Regulation 18 consultation, such as the prerequisite improvements to our water supply and sewage networks.
- 3.16 The IDP will form the basis for on-going work with our infrastructure delivery partners and those bringing development sites forward. It will also provide an essential link between our new Local Plan and how we spend our Community Infrastructure Levy receipts, and bid for infrastructure grant funding.

4 Financial and Manpower Implications

- 4.1 The proposed suite of infrastructure strategies has been prepared by the Planning Policy Team, taking into account on-going discussion with infrastructure partners and those promoting sites. This work has also been informed by technical evidence prepared in support of the emerging new Local Plan.
- 4.2 **Chief Finance Officer's comments:** none for the purposes of this report.

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

5.1 National planning policy requires that new Local Plans include strategic policies that set out the overall strategy for the pattern, scale and quality of development, making sufficient provision for new growth, necessary supporting infrastructure, community facilities and the natural and built environment. The proposed infrastructure strategies and site allocation options referenced in this report are offered as a sound response to 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 The proposed suite of infrastructure strategies and any associated site allocation options are subject to the wider Local Plan sustainability appraisal reporting process.

7 Partnerships

7.1 Our Local Plan will need to satisfy all of the tests of soundness, including demonstrating that it is effective. Any strategic policies will need to demonstrate a level of broad support from our partners in neighbouring local planning authorities. Engagement with neighbouring authorities will be secured through the on-going duty to cooperate process. This will be evidenced through a statement of common ground between partners.

8 Risk Assessment

8.1 The areas of risk which need to be managed with the emerging new Local Plan include:

- Ensuring that our emerging growth strategy and its supporting strategies are sound so as to meet the requirements of the Secretary of State at examination. The Secretary of State will not identify sites or strategies for us;
- Our existing evidence base will become dated if delays occur as a result, which could stall the whole process;
- Reputational damage from having an unsound Local Plan may have far reaching consequences;
- Not all growth strategies deliver the infrastructure that the Borough needs. For example. Smaller sites are unlikely to secure meaningful investment in infrastructure.

9 Conclusion and Recommendations

- 9.1 The Committee are asked to the content of the proposed Strategies relating to new infrastructure.
- 9.2 Subject to any changes the Committee endorses the proposed Strategies in respect of the preparation of the Local Plan Regulation 18 public consultation.

Ward(s) affected: (All Wards);

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