

LOCAL PLAN - GROWTH AND 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): Annex 1: MHCLG Letter 9 October 2017
Annex 2: MHCLG Letter 6 September 2019
Annex 3: MHCLG Letter 2 October 2019

Other available papers (not attached):

Report summary

The National Planning Policy framework has been amended and a new way of calculating the housing requirement for local areas has been nationally implemented. This has had implications for the Borough, and the work programme for the new Local Plan. In addition, communications from the Ministry of Housing, Communities and Local Government have both informed and confused the national policy position.

To help to shape the strategic direction on key questions in the Borough, this report seeks to clarify key matters that are relevant in the production of the new Local Plan for the Borough.

Recommendation:

The Committee is asked to agree:

- (1) the Six Principles setting the strategic direction for the new Local Plan's growth strategy, and**
- (2) they will revisit these Principles in light of any further changes relating to the National Planning Policy Framework or new evidence coming forward through the Local Plan process.**

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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 as it will set out how sustainable growth, particularly in relation to new housing, will be delivered during the plan period.

2 Background

- 2.1 In 2016 the Borough Council commenced the production of a new Local Plan as the existing Core Strategy was no longer sound. Critically this is because the Core Strategy's overall growth¹ and housing strategies² are not based on an objective assessment of housing need. For that reason, our current Local Plan is unsound – not being positively prepared, justified or consistent with national policy³.
- 2.2 In the absence of an up-to-date Local Plan, national planning policy requires decisions to be taken with a presumption in favour of sustainable development⁴. Within the context of our Core Strategy's out-of-date growth strategy and associated housing strategies, this could lead to proposals for development of a scale and upon sites that our current Local Plan does not consider appropriate. Without an up-to-date local plan the Borough Council may find it difficult to defend decisions that refuse such proposals – subject to them demonstrating that they constitute sustainable development as defined by national planning policy. With that possibility, the Borough Council has actively pursued the preparation and production of a new Local Plan that, once submitted, could be found sound at examination and be subsequently adopted.
- 2.3 National planning policy requires that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence⁵. Securing an up-to-date evidence is key in demonstrating that a new local plan's growth strategy and policies are justified.

Steps taken

- 2.4 Our first step in this process was to jointly commission, along with our housing market area partners⁶, the preparation of a new Strategic Housing Market Assessment (SHMA).

¹ Core Strategy Policy CS1 Creating Sustainable Communities in the Borough.

² Core Strategy Policy CS7 Housing Provision and Core Strategy Policy CS8 Broad Location of Housing Development.

³ As set out under the National Planning Policy Framework Paragraph 35.

⁴ As set out under National Planning Policy Framework Paragraph 11 c) and d).

⁵ As set out under National Planning Policy Framework Paragraph 31.

⁶ These included the Royal Borough of Kingston, Elmbridge and Mole Valley.

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- 2.5 The new SHMA (2016) was the subject of a report [to the Committee on 6 September 2016](#). The SHMA (2016) was prepared in accordance with national planning policy that was current at the time⁷. It used its own bespoke methodology to calculate need and drew upon the then recent Communities and Local Government household projections 2012. The new SHMA (2016) identifies an objectively assessed housing need (OAHN) of 418 additional new homes per annum.
- 2.6 On [23 February 2017 the Licensing & Planning Policy Committee](#) received a verbal report on the government's Housing White Paper "Fixing our Broken Housing Market". The White Paper was significant because it signalled the government's intent to have a standard methodology for calculating OAHN that all planning local authorities would be required to use. The Committee were informed that all Members would receive a detailed briefing on the implications of the White Paper on 30 March 2017.
- 2.7 [The April 2017 Licensing & Planning Policy Committee](#) received a full report on the proposals contained in the government's White Paper. The report stated that in order to secure a rolling supply of housing land the White Paper proposes significant changes to how local planning authorities plan and manage housing demand. This placed the emphasis on local planning authorities to facilitate a significant increase in housing delivery at all costs. The report stated concern that the White Paper envisages urban areas in England becoming more densely populated than ever, with cities expected to build upwards rather than outwards, and for homes to get smaller.
- 2.8 The [April 2017 Committee also received a report on the Local Plan Annual Monitoring Report for period 2015/16](#). This was the last time the Borough's local plan performance was assessed against the delivery of the Core Strategy growth and housing strategies. This was the last Annual Monitoring Report that was able to demonstrate at least a five year supply of housing land based upon 181 dwelling units per annum. Subsequent reports have shown progressively diminishing supply.
- 2.9 During [July 2017 the Licensing & Planning Policy Committee](#) received a report on the Borough-wide Strategic Housing Land Availability Assessment (SHLAA). This is a key document that forms part of the evidence base that informs the preparation and production of the new Local Plan. The SHLAA seeks to identify and account for future potential sources of housing land supply and identify a five year supply of specific deliverable sites. The SHLAA was able to identify a 5.7 years of supply when assessed against the target identified by Core Strategy Policy CS 7. However, it was only able to identify 1.3 year supply when assessed against the OAHN identified within the recently published SHMA.

⁷ The National Planning Policy Framework 2012 and associated planning practise guidance.

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- 2.10 The report on the SHLAA is significant because it provided the Committee with a clear insight into the scale of the challenge facing Borough in terms of meeting the OAHN and at the same time securing at least a five year supply of housing land. The Committee agreed the publication of the SHLAA; that subsequent Local Plan Annual Monitoring Reports would assess housing delivery against the OAHN and that the outputs of the SHLAA would inform the emerging new Local Plan.
- 2.11 The [July 2017 Licensing & Planning Policy Committee also received a report on the Primary Constraints](#) present across the Borough. This was an important report as it identifies the specific constraints that influence plan making and in particular the supply of new housing land.
- 2.12 [The Licensing & Planning Policy Committee considered the Local Plan Issues & Options Paper on 14 September 2017](#). On the same day, the Government published its proposals for revisions to national planning policy. This included their proposals for a standard method for calculating OAHN. The proposals included an OAHN calculation for all local planning authorities. In contrast, to the outputs of the Borough Council's SHMA, the standard method using more recent data⁸ identified a housing requirement of 579 new additional homes per annum for the Borough. Furthermore, the government signalled that the OAHN calculated through the standard method would serve as an "at least" starting point. Previously it had been thought that OAHN could be managed downwards to take account of local constraints (to housing land supply).
- 2.13 [On 26 October 2017 the Licensing & Planning Policy Committee received a report entitled "Planning for the right homes in the right places – the Council's response"](#). This report set out the Council's response to the government's proposed changes to national planning policy. This included the Borough Council's position on the standard method for calculating OAHN, and signalled the challenge of meeting the Borough's identified OAHN in full.
- 2.14 [During January 2018 the Committee received a report setting out the responses submitted to the Local Plan Issues & Options Consultation](#). It highlighted that the responses were broadly supportive of Option 4, a balanced approach to accommodation future growth through intensification and modest use of land currently located in the Green Belt. Detailed reading of the responses shows that support for urban intensification was widespread among all respondents. The responses also confirmed the importance of green infrastructure, open spaces, transport networks, education provision and design quality as key elements of the plan making process that many believed needed to be incorporated as part of a future growth strategy. The responses from the consultation exercise have informed the preparation of the new emerging Local Plan – specifically in relation to the growth and housing strategies.

⁸ Specifically the 2014 Population Projections.

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- 2.15 In response to changes in national planning policy; specifically in relation to meeting housing demand, development densities and building; the Licencing & Planning Policy Committee received a report entitled [“Making efficient use of land – optimising housing delivery”](#). Changes to national policy now had major implications for the Borough Council’s adopted policies on housing development density and building height. The Committee had to acknowledge the need to optimise development land and that due weight be attached to these matters when assessing planning applications against current adopted local policies.
- 2.16 As a result of all the national changes around driving growth, by the Summer 2018 the Borough Council was required to undertake additional work in order to demonstrate that all possible growth options; particularly in relation to development land supply; had been explored.
- 2.17 Two strands of evidence would explore this area further – those being the Urban Housing Capacity Study and the Epsom & Ewell Masterplan. The commissioning of the latter document was the subject of a [report to the Licensing & Planning Policy Committee on 7 June 2018](#). The report set out the importance of the Masterplan, in the context of preparing a new Local Plan, and sought the Committee’s agreement that a further report be set before [the Strategy & Resources Committee to secure funding for this work](#).
- 2.18 The objective of the work was to identify an appropriate strategy and mechanisms that responded to the Borough’s OAHN. The Masterplan was also then tasked with providing a visualisation of how the Borough could change. That visualisation exercise took full account of responses from residents⁹, which highlighted the importance of green infrastructure, open spaces and design quality in respect of the Borough’s future growth.
- 2.19 Following the publication of the revised national planning policy the Licensing & Planning Policy Committee received [a report on 27 September 2018](#) that set out the implications for planning and decision taking in the absence of a five year housing land supply. The Committee was required to agree that future decisions would accord with revised national planning policy.
- 2.20 During [November 2018 the Licensing & Planning Policy Committee received two reports](#):
- 2.20.1 One setting out the findings of a study that assessed the potential housing capacity of the Borough’s two strategic employment sites.

⁹ These were responses made in respect of both the Local Plan Issues & Options Consultation and the Future40 Visioning exercise.

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- 2.20.2 The second confirming that a new Infrastructure Delivery Plan would be prepared to take account of the Borough's OAHN and sought to identify the scale of new infrastructure investment that would be required and come from that level of growth.
- 2.21 [On 24 January 2019 the Licensing & Planning Policy Committee received Epsom & Ewell Urban Housing Capacity Study](#). The study concluded that the Borough could achieve 49% of its OAHN within the existing area at its optimal level. This outcome suggests that at least half of the OAHN need will need to be met elsewhere.
- 2.22 During February 2019 the Borough Council were informed by Ministry of Housing, Communities and Local Government that it had only delivered 57% of its housing requirement and as a consequence it had failed the Housing Delivery Test. As a result a report was required to be taken to set out how the Borough Council was intending to address this. This report went to the [12 September 2019 Licensing & Planning Policy Committee](#) .
- 2.23 The Committee received a report on [the Draft Epsom & Ewell Masterplan on 23 September 2019](#). The draft masterplan set out an appropriate strategy for meeting half of the Borough's OAHN by focussing growth at sustainable and accessible locations across the Borough. It was agreed that a future report to the Committee would identify potential site options that would respond to the residual unmet need.

Implications of National Policy Changes

- 2.24 The chronology of reports evidences the pressures the Borough Council has been under to meet the Government's constantly changing policy framework.
- 2.25 By drawing out key aspects for particular attention, a clear picture of these pressures emerges:
- National planning policy identifies a standard method for calculating OAHN. That calculation is the minimum starting point for identifying a location's housing requirement. The government's expectation is that the housing requirement will be no less than the OAHN identified through the standard method;
 - National planning policy requires a local plan's growth strategy explore and assess all available and deliverable options for meeting OAHN and other components of development need;
 - National policies require Local Plans to identify at least a five year supply of housing. The Borough can currently only identify just over one year of supply.

In terms of the evidence bases:

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- The majority of those responding to the Borough Council's Local Plan Issues & Options Consultation expressed a view that the balanced option for growth, utilising urban and greenfield sites, be pursued. The consultation responses also demonstrated that a sample of our residents supported intensification within the urban area;
- The evidence from the SHLAA, Urban Housing Capacity Study and the Call-for-Sites exercise demonstrates that available, deliverable and developable sites within the existing urban area can only deliver between about 40 – 50% of our OAHN; subject to the capacity of those sites being optimised;
- The Epsom & Ewell Masterplan identifies an appropriate and sustainable strategy for growth and housing delivery. That strategy seeks to optimise and prioritise the delivery of growth at sustainable locations across the existing urban area;
- The Borough Council has followed a sequential process of assessing all available, deliverable and developable options for meeting our growth requirements.

3 Messages from the Ministry for Housing, Communities and Local Government

- 3.1 During the time period covered by the above chronology, the Ministry for Housing, Communities and Local Government (MHCLG) has published a suite of letters that have sought to expand upon national policy. These being responses from the Minister to specific questions posed either directly by local planning authorities to the MHCLG or indirectly as a consequence of their plan-making. In almost all cases the messages included in the letters from the MHCLG have been opaque. This has led to confusion and mixed messages as to the technical and legal interpretation of national planning policy, which has caused unease and concern among our residents and communities.
- 3.2 For example, one of the earliest communications was a letter from the then Minister (the Rt Hon Sajid Javid) to the local MP, dated 9 October 2017 (see Annex 1). Within this letter, the Minister explained that the OAHN calculated through the government's standard method formula was not a housing target but the "starting point in the plan-making process, not the end" and that would be for local planning authorities to determine how much need they could meet

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- 3.3 The letter fails to address that national planning policy considers the OAHN to be a baseline level of need; with an assumption that authorities deliver more new homes, rather than less than their OAHN. That position is an implication of the government's commitment to deliver 300,000 additional new homes per annum, which is only possible if local planning authorities exceed their OAHN. The Minister did not expand upon the requirement that local planning authorities prepare appropriate strategies for delivering new housing that also address any resulting unmet need. That message was only clarified through the Castlepoint Local Plan examination clarified in December 2016, which failed due to the local planning authority (and neighbouring authorities) not having an agreement as to how unmet need would be delivered.
- 3.4 This letter, and subsequent communications, also stressed the government's commitment to national Green Belt policy. The Minister (and his successor) noting that national planning policy places the responsibility for reviewing Green Belt boundaries with local planning authorities, subject to there being exceptional circumstances that justify such decisions. For clarity, national planning policy states that meeting housing need in full falls under the definition of "exceptional circumstances".
- 3.5 A letter from an MHCLG officer (dated 6 September 2019), provides a response to a question posed to the Rt Hon Robert Jenrick MP (see Annex 2). In the letter reiterates the point that the OAHN that emerges from the standard method is not a target but a starting point that local planning authorities use to identify their housing need. As with the previous letter, this letter does not clarify the position that national planning actually requires. This failing has led to confusion and for some to misinterpret the policy position set out in this letter.
- 3.6 The letter continues by reiterating that Green Belt boundary may only be reviewed in exceptional circumstances. It is regrettably silent on the fact that an area's inability to meet their housing requirement in full constitutes an exceptional circumstance for such a review. Again this omission has caused confusion and concern.
- 3.7 Most recently, the current Minister (the Rt Hon Ester McVey), contacted Broxstowe Borough Council following the Inspector's fact check report of their recent local plan examination. [In her letter dated 2 October 2019](#) (Annex 3) the Minister stated that the government believes that local councils and their communities are best placed to take decisions on planning matters in their area without unnecessary interference from government. This letter could be read as a license for local planning authorities to pursue agendas that are not in accordance with national policy.

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- 3.8 In this case, the Minister has provided some clarity in highlighting that prior to considering sites currently designated as Green Belt land, local planning authorities must first demonstrate that they have fully explored “sequentially preferable locations outside of the Green Belt”. This clarification reinforces the often quoted – “look under every stone” analogy that Inspectors apply within this context. The chronology set out in the section above provides evidence of how we have sought to meet that requirement.
- 3.9 With all of the letters referred to in this report MHCLG are silent on the penalties which could be imposed on Authorities that do not have a five year housing land supply, omitting to mention the housing delivery test, the requirement for a Housing Delivery Action Plan and the imposition of the 20% buffer. The 20% buffer imposes the penalty of needing to deliver more housing, taking the OAHN figure to 695 units per annum until there is a five year housing land supply.

4 Infrastructure Needed for the Borough

Education

- 4.1 There is an identified need for an additional five primary forms of entry and eight secondary forms of entry. However, the larger uplift in the secondary sector is in part attributable to historic increases in the birth rate. Provision to meet this need would be likely to take the form of a new ‘all the way through’ school, comprising two forms of entry at primary level and eight forms of entry at secondary level. Additionally a new three form of entry primary school or fully utilising the existing capacity in four of the Borough’s existing primary schools would be required.
- 4.2 Future investment in our education provision will be heavily influenced by our strategy for future housing growth. The determining factor in whether the Borough needs new addition schools, or whether demand can be absorbed through expansion of existing schools, will be the scale of housing to be delivered through the new Local Plan. It is noted that early engagement with providers identifies a need for an additional three primary forms of entry and five secondary forms of entry based on delivering of a lower growth scenario. This infrastructure would need to be funded from the development.

Transport

- 4.3 The Borough is fortunate in being a highly accessible place, with a comprehensive highway network, excellent rail links (particularly into London) alongside an abundance of local facilities. However, it is becoming increasingly apparent that our travel habits need to evolve to respond to prominent issues such as the adverse impact of climate change; deteriorating air quality; and mounting highway congestion. The emerging new Local Plan provides an opportunity to address these issues and an important element will be the inclusion of a transport strategy.

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- 4.4 Evidence has shown that many parts of the existing highway network are at capacity, particularly at pinch points around junctions. It is clear that no amount of further investment in these particular areas is likely to have a positive impact on their capacity. As such, the main focus of the transport strategy is likely to be on the provision of genuine sustainable transport options and capturing the opportunities and benefits from evolving technology.
- 4.5 The level of investment into the Borough's transport infrastructure is likely to be primarily driven by development in terms of site-specific investments and CIL contributions. For example the accessibility improvements planned for Stoneleigh Station are to be part funded by CIL contributions which were successfully used to attract significant match funding from the Network Rail Access for All programme.

Other Infrastructure

- 4.6 The commitment to deliver more homes over the new Local Plan period will require investment in other areas of infrastructure. Although healthcare and the emergency services are continually making efficiencies and streamlining services, an increased population will generate additional demand.
- 4.7 The Surrey Heartlands Clinical Commissioning Group have identified that 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. The delivery of our OAHN in full potentially requires an increase in provision of about 0.5 new full time equivalent GP positions per annum, which would equate to 10 new GP's over the 20 year plan period.

5. Effects on the Borough

- 4.8 As a result of the implications of the changing national growth strategy, it was both anticipated and felt necessary that the Borough Council's Local Plan Programme (June 2019) would require the draft Local Plan to be the subject of a further public consultation¹⁰ during Autumn 2019.
- 4.9 The increasing level of local public awareness and understanding of the possible implications for the Borough – particularly in respect of visual impact of higher intensity development upon the Borough – has led to public calls for the Borough Council to reconsider how it brings forward an appropriate strategy for future growth.

¹⁰ In accordance with the Town & Country Planning (Local Planning) Regulations (2012), under Regulation 18.

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- 4.10 In an effort to ensure the Local Plan development process aligns with local context, the Committee are asked to agree a set of principles which will drive the strategic direction on key questions affecting the Borough. This will then inform the growth strategy for the production of the new Local Plan for the Borough.

5 Key Principles

Principle 1 – Character of the Borough

- 5.1 Planning policies should support the “desirability of maintaining an area’s prevailing character and setting” (NPPF para 122(d)). In addition developments should ‘function well and add to the overall quality of the area [be] visually attractive ... sympathetic to local character, including the surrounding built environment and landscape setting ... [and] create places ..with a high standard of amenity for existing and future users’ (NPPF para 127).

Principle 2 – The focus for Development

- 5.2 As outlined in the approved draft Masterplan, we will focus housing development in the following locations:
- Epsom Town Centre
 - Other centres and stations
 - Principal movement corridors
 - Strategic employment sites
 - Intensification of the urban area
 - Urban edge of green belt

Principle 3 Design

- 5.3 Design Policies will require developers to deliver design quality with an emphasis on green and family friendly, and which ensures that each development is ‘of Epsom’ reflecting the local character and setting.

Principle 4 – Heights and Density

- 5.4 Policies will also address the density and height of developments and place a height restriction [storeys] which reflects each localities character and setting based on the NPPF.

Principle 5 – Climate Change

- 5.5 The Local Plan policies will reflect the Council’s commitments in the Environmental Action Plan (Climate Change Action Plan).

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Principle 6 - Infrastructure

- 5.6 The Local Plan policies will address the issues of necessary infrastructure to ensure that new developments are sustainable.

6 Delivering the Growth and Housing

- 6.1 The Borough is currently without a five year housing land supply. In its absence, national planning policy requires that decision-taking presume in favour of sustainable development. This means proposals that are now coming before the planning authority that accord with the national planning policy objectives of sustainable development should be granted. There is a genuine risk that development proposals that the Borough Council considers to be of inappropriate nature and in unsustainable locations will be granted. The most defensible act of mitigation against this risk is to prepare and submit a sound Local Plan that meets our OAHN in full and secures at least a five year housing land supply. On the basis of our evidence, the securing of a five year housing land supply will require the identification of at least one major site.
- 6.2 A strategy that concentrates new growth within the existing urban area is likely to take longer to deliver. This position is established by evidence that demonstrates that previously developed sites, and sites with urban areas are more complex and consequently take longer to deliver. The implication is that such strategy will not be able to demonstrate at least a five year housing land supply. The evidence prepared in support of our new Local Plan suggests that this is an area of high risk.
- 6.3 The Local Plan has sought to meet local housing needs through new development. The greatest area of housing need being for additional new affordable housing provision. Changes in national planning policy have progressively made securing new affordable housing through new housing development challenging. Significantly, the Borough Council can no longer seek contributions towards affordable provision from minor developments, neither can it seek contributions in situations where they render development financially unviable. A strategy that relies upon sites within the existing urban area will invariably be based upon smaller sites. When considered alongside a possible lower growth scenario it is likely that future affordable housing delivery will be significantly reduced.
- 6.4 The possible implications for future infrastructure investment have been set out above. It is envisaged that the opportunities to secure investment in our transport networks, education facilities and green infrastructure (among others) will be limited by a low growth scenario. This would have long term consequences for the Borough.

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7 Financial and Manpower Implications

- 7.1 There continues to be a requirement to prepare a sound local plan that is positively prepared, justified, effective and consistent with national planning policy. Our new Local Plan will need to have an appropriate strategy that delivers future growth. The Planning Policy team are focussed on the preparation and production of the Regulation 18 Consultation paper and evidence base.
- 7.2 The Six Principles set out a strategic approach towards future growth. Further understanding on the soundness of the approach will emerge as the work towards a new Local Plan continues.
- 7.3 **Chief Finance Officer's comments:** *A £156k budget for producing the Local Plan was agreed by S&R Committee in July 2019, funded from the Planning Delivery Grant Reserve. A further £75k budget for a public consultation was approved by S&R in September, funded from additional 2019/20 planning income in the first instance, with the remaining balance met from the Corporate Projects Reserve.*

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

- 8.1 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 environment¹¹. The Six Principles could form the basis for the strategic policies included in the new Local Plan.
- 8.2 New Local Plans are required to meet the tests of soundness. This means that as minimum they meet the identified OAHN. Any potential strategy that comes out of the proposed Six Principles 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.
- 8.3 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 with more than one justifiable growth strategy, it will need to ensure that its preferred approach is defensible.

¹¹ This is set out under NPPF Paragraph 20.

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- 8.4 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 land¹². The Borough Council can demonstrate that it has met this requirement through a sequential evidence building process that includes the SHLAA, the call-for-sites consultation exercise, the Urban housing Capacity Study, the Strategic Employment Sites Capacity Study and the Epsom and Ewell Masterplan.
- 8.5 **Monitoring Officer's comments:** None arising from the contents of this report.

9 Sustainability Policy and Community Safety Implications

- 9.1 Any strategic policies that emerge from the subsequent development of the proposed Six Principles will be subject to the wider Local Plan sustainability appraisal reporting process.

10 Partnerships

- 10.1 Our Local Plan will need to satisfy all of the tests of soundness, including demonstrating that it is effective. Any strategic policies that emerge from the proposed Position Statement will need to demonstrate a level of broad support from our partners in neighbouring local planning authorities, with the expectation that we will deliver the Borough's OAHN. Engagement with neighbouring authorities will be secured through the on-going duty to co-operate process. This will be evidenced through a statement of common ground between partners.
- 10.2 For clarification, the Surrey authorities that did submit local plans with lower housing targets (than their OAHN) did so during the transitional period permitted by national planning policy. Our new Local Plan will not benefit that transitional period. It is worth noting that local plans submitted under those arrangements will have short lifespans.

11 Risk Assessment

- 11.1 The areas of risk which need to be managed with the emerging new Local Plan, these include:
- the emerging growth strategy will need to be sound so as to meet the requirements of the Secretary of State at examination, they won't make additions to the sites;
 - 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;

¹² The MHCLG has recently brought this requirement to the attention of local planning authorities through the form of an open letter to Broxstowe

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- our existing evidence base will become dated if delays eventuate, which could stall the whole process;
- delays in securing a five year housing land supply, through a sound Local Plan will have the potential for the Borough to be planned by planning applications and appeals rather than policies in our control;
- reputational damage from having an unsound Local Plan may have far reaching consequences;
- not all growth strategies deliver the infrastructure that the Borough needs.

12 Conclusion and Recommendations

12.1 The Committee are asked to consider the key matters that have been identified as being relevant to the production of the new Local Plan.

Ward(s) affected: (All Wards);