

## **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.

# Licensing and Planning Policy Committee

## 5 March 2020

### 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 18<sup>1</sup> 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 tests<sup>2</sup> 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).

---

<sup>1</sup> Of the Town & Country Planning Regulations.

<sup>2</sup> 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**,

# Licensing and Planning Policy Committee

## 5 March 2020

- 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.

## Licensing and Planning Policy Committee

### 5 March 2020

- 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.

# Licensing and Planning Policy Committee

## 5 March 2020

- 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.

# Licensing and Planning Policy Committee

5 March 2020

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.

# Licensing and Planning Policy Committee

## 5 March 2020

### **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);