



Dr Michael Bingham OBE
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Ministry of Housing, Communities &
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Dear Dr Bingham,

North East Surrey Authorities – Local Plan preparation

Despite the delays due to Covid-19 to the Local Plan timetables for the North East Surrey Authorities (Elmbridge Borough Council, Epsom & Ewell Borough Council and Mole Valley District Council) we are all making progress towards draft plans that we are seeking to present to our respective Committees for approval over the next six months. One of the key factors for Members when agreeing these will be the growth strategy for their area and the housing target derived from the Standard Methodology.

We have all studied the Government's proposed changes to the Standard Methodology (Changes to the current planning system) and the wider planning reforms proposed in the White Paper – Planning for the Future. Our responses to these consultations will be submitted in due course however, we would like to take this opportunity to raise our shared concerns as to how some of these changes could significantly delay our respective Local Plans and we seek a meeting with you to discuss these in more detail.

Since the publication of the 2018 household projections, we have received increased calls from our Members and communities to explore the potential implications that applying them may have on our housing numbers and growth strategies. Each local authority has written to their local MPs and / or the Secretary of State for Housing, Communities and Local Government setting out the implications of their use and seeking confirmation as to the Government's intended approach. These letters are attached for information.

To an extent, the Government's consultations address some of the concerns raised. However, we envisage further challenges to delivering an increased housing target and delay to the preparation of our Local Plans as a result of the proposals. As background, set out below are the changing housing targets for each authority.

	Current LP Target	Current Standard Method	Proposed Standard Method	Average delivery (3 years)
Elmbridge	252 dwellings	623 dwellings	774 dwellings	272 dwellings
Epsom & Ewell	181 dwellings	577 dwellings	604 dwellings	211 dwellings
Mole Valley	188 dwellings	453 dwellings	563 dwellings	306 dwellings

The Government's proposed changes to the Standard Method represent an increase from the current method of between 27 and 151 dwellings per annum for our three authorities, and 288 dwellings per annum collectively. The key driver of these changes is not the 2018 household projections (which would have seen a considerable decrease in the number of homes required) and a reflection of need but, proposed changes to the affordability ratio calculation (step 2) and the removal of the cap in order to continue to meet the Government's overarching ambition of providing 300,000 homes per annum.

This continued increase in housing target means it is impossible to deliver outside of the Green Belt. However, the Government's plans to "factor in land constraints including Green Belt" (page 23 of the White Paper) to the binding housing targets demonstrates a current disconnect in the Government's proposals and creates uncertainty in the planning system.

Many residents and Members view the text on page 23 of the White Paper as proof that the Government is going to reduce our housing numbers, as such we cannot see our respective Committees agreeing to a growth strategy and sites for housing before the Government's response to the White Paper consultation and consequent changes to the NPPF. This will delay the production of our Local Plans. The knock-on effect of this would be around the transitional arrangements of a new system. By our calculations, there is the real possibility that if we do not consult and submit our Local Plans before March next year we unlikely to fall under the transitional arrangements for examination and we will have to restart the production of our Local Plans in line with the new system set out in the White Paper. This would be a step backwards for our ambition of getting Local Plans in place.

Furthermore, by taking into account constraints including Green Belt alongside the Government continuing to seek to deliver 300,000 homes per annum, it is implied that an element of redistribution will be involved. Coupled with the proposed changes to Duty to Cooperate, it is unclear as to how this would be achieved and at what spatial level this will be led. Again, this adds to uncertainty in the process.

We therefore ask that the Government gives a clear and speedy direction to LPAs to prevent slippage in our Local Plan timetables. Our shared concern is that any changes to how housing numbers are derived will require further investigation, causing further delay to preparation of Local Plans in North East Surrey.

In order to deliver our local plans, we need clarification and certainty over the housing targets. We believe a meeting with MHCLG representatives would be beneficial for all, providing an opportunity to fully understand the implications for any potential changes in housing targets for places like Elmbridge, Epsom & Ewell and Mole Valley and our Local Plan preparation.

We look forward to hearing from you.

Yours sincerely,



Kim Tagliarini
Head of Planning Services
Elmbridge Borough Council



Viv Evans
Head of Planning
Epsom & Ewell



Piers Mason
Executive Head of Service
(Planning & Regulation)
Mole Valley District Council