

Epsom & Ewell Local Plan Programme



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1. Introduction

The form and content of the Local Plan Programme

- 1.1 The Local Plan Programme sets out a rolling project scheme for the production of the new Epsom & Ewell Local Plan. It identifies a timetable for the preparation and production of the new Local Plan that serves as a framework for monitoring and managing progress. The Programme identifies and allocates proportionate resources necessary to achieve our targets; and possible risks and constraints.
- 1.2 The Programme is designed to provide a rolling three-year project plan - that informs the process and all of the interested parties and partners¹ about how and when the Local Plan will be brought forward. We periodically review and revise the Programme in response to circumstances necessitating a change in our plans.
- 1.3 Previous Local Plan Programmes and Development Schemes have typically been reviewed after being in place for two years or so. Revisions have normally been triggered by significant changes in national planning policies, such as the revocation of regional plans and the publication of the National Planning Policy Framework (NPPF); and consequential changes in our approach to plan-making. Our progress against the milestones in the Programme is monitored each year in the [Annual Monitoring Report \(AMR\)](#).
- 1.4 In accordance with good project management practise we continue to monitor and review the Local Plan Programme annually and update it accordingly. It is this monitoring process that has triggered this current review of the Programme.

The current statutory Development Plan for the Borough

- 1.5 The Development Plan for the Borough is comprised of the following documents:

The Local Plan

- Epsom & Ewell Core Strategy 2007
- Plan E Epsom Town Centre Area Action Plan 2011
- Epsom & Ewell Development Management Policies Document 2015
- Upper High Street, Depot Road and Church Street Development Brief 2012
- Revised Developer Contributions Supplementary Planning Document 2014
- Parking Standards for Residential Development 2015
- Revised Sustainable Design Supplementary Planning Document 2016

Surrey-wide Documents

- Surrey Waste Plan 2008
- Surrey Minerals Plan Core Strategy 2011

¹ Our partners in this process may include neighbouring local planning authorities, more distant authorities that either have or will in the future have an interaction with our housing market area, the County Council and strategic infrastructure providers.

- 1.6 In addition to the above documents we have also prepared and produced a number of useful and valued supplementary planning guidance documents. These amplify the policies and proposals of the Local Plan. Such additional local guidance is considered necessary and for that reason is believed to be consistent with national planning policy. The main role of these documents is to clarify and support local policy and it may be taken into account as a material consideration in relation to the determination of planning applications. These include the following documents:
- Single plot and other types of residential infill development 2003
 - Householder Applications 2004
 - Solar Panel Guidance for Domestic Installation 2011
 - Biodiversity and Planning in Epsom & Ewell 2012
 - Shopfront Design Guide 2012
- 1.7 In parallel to our new Local Plan we have prepared a Masterplan for Epsom & Ewell that explores how the Borough could positively transform to respond to the significantly higher scale of housing demand calculated through the government's standard method. It will initially sit alongside our emerging Local Plan – providing supporting evidence and information during the examination in public process. It is possible that following the adoption of our new Local Plan that it could provide a supplementary planning framework that will contribute towards the sustained transformation of the Borough into the 2040s.

2. The new Epsom & Ewell Local Plan

Proposed Content

2.1 We anticipate that the new Epsom & Ewell Local Plan will include the following policy components:

- A Borough-wide growth strategy that brings together how we will positively plan for growth across all of our land uses – including new housing, employment, retail, green infrastructure, sustainable travel and other essential infrastructure networks. The emerging strategy will also incorporate six key principles that have been identified as being essential for securing sustainable growth;
- An appropriate approach to housing that responds to the government's assessment of objectively assessed housing need²;
- Revision of the Borough wide housing target to take account of objectively assessed housing need³; taking account of the relevant constraints affecting the ability of the development industry to deliver the scale of housing during the plan period;
- An overview of how the Borough Council will work with its housing market area partners and others to address unmet need⁴;
- A strategic review of the Green Belt⁵;
- A review of our affordable housing delivery policy⁶;
- New policies setting out our approach towards heritage assets – specifically in relation to the identification and designation of locally listed buildings and structures;
- An approach to economic development which encompasses the continued evolution of Epsom Town Centre and the Borough's other retail centres;
- An appropriate approach to infrastructure that responds and complements the scale of new housing identified by the government's objectively assessed housing need calculation. This will seek to bridge the gaps in capacity and funding that currently serve to constrain the necessary scale of new housing delivery required to meet the government's assessment of need⁷.

2.2 We also anticipate that the new Local Plan will include new site allocation policies relating to:

- Green Infrastructure⁸

² As set out in Core Strategy Policy CS8, which currently states that new housing will be located within the defined built up area and within the then remaining Hospital Cluster development sites, which have subsequently been largely built-out.

³ As currently set out in Core Strategy Policy CS7.

⁴ It is anticipated that this will take the form of a separate strategy or agreement siting outside of the Local Plan

⁵ As currently set out in Core Strategy Policy CS2.

⁶ As currently contained within Core Strategy Policy CS9

⁷ A new policy that will replace the approaches set out under Core Strategy Policies CS12 and CS16.

⁸ Green Infrastructure is a term we use to describe a wide variety of assets that among other things contribute to our local biodiversity, our visual character and appearance, help to mitigate the adverse impacts of climate change and provide vital open space for our residents and those of adjoining areas.

- Housing delivery
- Employment sites
- Retail centres
- Education infrastructure
- Sustainable transport networks

2.3 Some of these policies and site allocations were originally intended for inclusion within the Site Allocations Document⁹, which was subject to pre-submission public consultation during 2015/ 2016. It is anticipated that the draft policies and site allocations that formed part of that earlier process, and which remain sound and relevant, will be brought forward through the new Local Plan.

Coverage

2.4 The document covers the whole of the Borough. To date the Local Plan period has been identified as starting during 2015 and ending during 2032. This period was derived from [the Kingston and North East Surrey Strategic Housing Market Assessment \(June 2016\)](#), which provided an initial calculation of the Borough's objectively assessed housing need (in advance of the standard methodology). That document used 2015 as the baseline date for calculating objectively assessed housing needs. The Local Plan period has been reset to start at 2017, which is the baseline date for the government's standard methodology; which identifies a Local Plan period end date during 2037.

Conformity

2.5 The new Local Plan will be in conformity with the NPPF. It will set out the scale of local housing need and the broad areas and the specific sites across the Borough that will be brought forward to deliver future housing. It will also set out our approach to meeting local affordable housing need through the development process.

⁹ That document comprised non-housing site allocations.

Timetable

- 2.6 The review of the Local Plan Programme has introduced an additional Regulation 18 Consultation, which seeks to build-upon earlier consultation conducted during 2017. The proposed scope of the Regulation 18 Part 2 consultation will be focussed on confirming a Borough-wide growth strategy; an appropriate housing strategy; and the specific sites required to deliver its outcomes. The Final Issues & Options Consultation will also consider other aspects of growth – including economic development, retail, infrastructure provision and ensuring that our future growth is embedded with quality. At the conclusion of the proposed consultation period, we anticipate that the process will move towards the pre-submission stage.

<i>Key Stages</i>	<i>Dates</i>
Issues & Options and Call for Sites Consultations (Regulation 18 Part 1)	September – December 2017
Consideration of Consultation Responses	December 2017 – March 2018
Preparation and Production of the Masterplan for Epsom & Ewell	June 2018 – June 2019
Preparation of the Epsom & Ewell Duty to Co-operate Engagement Plan	September – October 2018
Final Issues & Options Consultation (Regulation 18 Part 2)	November - December 2020
Consider consultation responses and prepare revised draft Local Plan	January – June 2021
Report to LPPC Reg.19 Publication Version of the Draft Local Plan	June 2021
Pre-Submission Public Consultation	July – September 2021
Date of Submission to Secretary of State	October 2021
Pre-Examination Meeting	December 2021
Public Hearing	January 2022
Estimated Date for Adoption	December 2022

Arrangement for Production

Organisational Lead
Head of Planning

Political Management

- 2.7 The review process will be managed by our Licensing & Planning Policy Committee, who are responsible for approving draft policy options for public consultation and the subsequent Pre-submission stages.
- 2.8 Full Council approval will be required for the final adoption stage.

Internal Resources

The Planning Policy team comprises of the following roles:

Planning Policy Manager x 1 FTE (vacant post)

- Senior Planning Policy Officer x 1 FTE
- Planning Policy Officers x 1.2 FTE
- Planning Policy CIL Officer x 0.7 FTE (approx. 20% time on Planning Policy administration)

Other resources as required – likely to be deployed from within the wider Planning Department, and as necessary from across the organisation.

External Resources

- 2.9 Consultants are engaged in the production of the necessary technical evidence base documents. External expertise has already been deployed in relation to housing need, an assessment of the Borough's Green Belt, retail needs and economic development. Internal knowledge and other resources will be deployed in order to optimise the value of external resources. Further studies will be produced, either in-house or by external consultants, as necessary.

Stakeholder Resources

- 2.10 We will work closely with neighbouring planning authorities and other strategic partners who have a tangible functioning relationship with the Borough to discharge our duty to co-operate. In a scenario where our Housing Strategy clearly and robustly demonstrates that it will not be possible to deliver our objectively assessed housing need in full during the plan period (potentially because of insufficient housing land supply or infrastructure capacity) we will work with our neighbours and other strategic partners to identify solutions as to how this could be addressed across a wider area. It is anticipated that this will form a critical part of the new Local Plan and will require the deployment of relevant resources from across the organisation.
- 2.11 We will work closely with local partners to ensure that the emerging policies contribute positively to meeting our strategic objectives. Specifically we will seek to ensure that future community infrastructure needs are taken into account during the preparation of new policies.
- 2.12 We will work closely and positively with landowners and the development industry to deliver the appropriate housing strategy that will be identified by the new Local Plan. Whilst we, as the local planning authority, carry the responsibility for securing housing delivery in response to the challenge of the government's objectively assessed housing need calculation, the industry is expected to shoulder some of this burden. In particular, we will require the industry to positively respond to the scale of growth in timely manner (during the plan period).
- 2.13 We will engage directly with key local community groups, local political party groupings and other local interest groups, such as the Epsom Civic Society and the Campaign to Protect Rural England. Representatives of stakeholder groups will be invited to attend regular meetings or surgery sessions

throughout the process, where they can informally discuss issues and options raised in the consultation. In order to comply with government safety guidance due to COVID-19, meetings and communications will be replaced by virtual meetings where appropriate.

Community and Stakeholder Involvement

- 2.14 The local community, specific consultation bodies and key stakeholders, including developers, will be invited to take part in the consultation process, with a view to identifying issues and working up suitable deliverable and developable options that accord with the NPPF. In order to comply with government safety guidance due to COVID-19, consultation procedures may need reviewing, specifically the Statement of Community Involvement document.

3. The Evidence Base

- 3.1 Our new Local Plan is supported and informed by new evidence and a refresh of existing technical studies. This work conforms to national planning policy and guidance. It also takes account of relevant existing technical evidence that is available across north east Surrey and south west London.

Timetable

Documents	Publication Dates
Strategic Housing Market Assessment ¹⁰	October 2016
Green Belt Study Stage 1	February 2017
Strategic Housing Land Availability Assessment (SHMA) ¹¹	July 2017
Traveller Accommodation Assessment	July 2017
Constraints Study	July 2017
Strategic Flood Risk Assessment Update	June 2018
Green Belt Study Stage 2	July 2018
SHMA version 2	September 2019
Draft Masterplan	September - October 2019
Retail Needs Study and Centre health Check	February 2020
Spatial Economic Development Strategy	February 2020
Scoping Report on the Racecourse and Equestrian Sector in Epsom & Ewell Borough	March 2020
Indoor & Outdoor Sports Facilities Assessment and Playing Pitch Strategy	September 2020
Open Space Audit Review	September 2020
Strategic Viability Assessment	November 2020 (alongside the Reg 18 consultation)
Habitats Regulations Assessment	November 2020 (alongside the Reg 18 consultation)

- 3.2 The preparation and production of the above technical studies has/will include proportionate and necessary stakeholder engagement. This is most likely to relate to the methodology used by the technical study in question, rather than the outputs or conclusions. Any party who wishes to challenge the outputs from these technical studies may do so through the Local Plan process, where they have an opportunity to present alternative evidence.

¹⁰ Originally prepared in partnership with Royal Borough of Kingston, Elmbridge and Mole Valley Borough Councils.

¹¹ Previous Local Plan Programmes have referred to Strategic Housing and Employment Land assessments. We already undertaken significant work on establishing our future employment needs into the future, so a joint study is no longer considered necessary.

4. Supporting Statement

Monitoring

- 4.1 Monitoring continues to be an important part of the planning-making process and will help gauge the effectiveness of policies and proposals. We will monitor a range of indicators to assess whether the policies and proposals are meeting the objectives set out in our Local Plan. The key findings will be published in the Annual Monitoring Report (AMR). The most recent, and previous AMRs are available to view on the Borough Council's website. The Local Plan AMR is normally the subject of a report to the Council's Licensing & Planning Policy Committee, following which it is published on the Council's website.

Reviewing the Programme

- 4.2 We will continuously monitor progress on the implementation of the Local Plan Programme. Progress will be monitored against the proposed timetable for our new Local Plan. Where milestones have not been reached, we will consider appropriate actions to ensure that positive momentum is maintained. When appropriate we will amend the Programme.

Strategic Environmental Assessments & Sustainability Appraisals

- 4.3 Strategic Environmental Assessments of policies, proposals and plans are required under the European Strategic Environmental Assessment Directive 2001/42/EC. These are required for plans and proposals that are likely to have significant effect on the environment. The UK left the EU on 31 January 2020, it is now in a transitional period up to 1 January 2021. It is anticipated that the requirements of the EU Directive will be maintained and incorporated into British law. The Environmental Bill is making its way through Parliament but due to Covid-19 the committee due to consider the Bill has been suspended with a new date scheduled for September 2020.
- 4.4 Sustainability Appraisals differ in that they are a social, economic and environmental assessment. We believe it is important to take an integrated approach towards both the Strategic Environmental Assessment and Sustainability Appraisal and to consider the implications and alternatives at an early stage. This will ensure that our Local Plan documents reflect sustainable development objectives. The requirements of a Strategic Environmental Assessment will be incorporated into the Sustainability Appraisal, which will be undertaken on the emerging policies when bringing forward our new Local Plan.

Resources

- 4.5 In the past funding from the Housing Planning Delivery Grant was allocated to assist in the plan making process. This has helped fund external expertise to undertake specialist work on technical papers. It has been proposed that remaining Housing Planning Delivery Grant monies and other sources of funding will be used to finance future work.

- 4.6 Staffing resources for the timely production of the Local Plan remain a critical issue (see Risk Management section below). At present, the following in-house resources can be drawn upon during the period covered by the Programme:
- Planning Policy Manager x1 (vacant post)
 - Senior Planning Policy Officer x1
 - Planning Policy Officers x 1.2 FTE¹²
 - Planning Policy CIL Officer x 0.7 FTE (approx. 20% time on Planning Policy administration)
 - Other occasional staff resources to be deployed either from with the Planning Service or from other corporate services as required
- 4.7 We will continue to use external sources of expertise where appropriate, such as on specialist topics or where there is no existing capacity. It is anticipated that Surrey County Council will continue to provide assistance with transport, education and other infrastructure capacity matters. Additionally the Planning Policy Team continues to promote joint working initiatives, whenever these are practicable and relevant, with the other Local Authorities in East Surrey to help bridge the potential staff resource gap. This has worked in the preparation of technical evidence.
- 4.8 Members are kept informed of progress on the Local Plan primarily through Licensing & Planning Policy Committee meetings. Throughout the Local Plan process we will continue to run special evening sessions/ workshops for Members. These will impart additional information and opportunities for Members to feed-in their comments into the plan making process. The outputs of the sessions/ workshops will be reported to the Licensing & Planning Policy Committee.

Joint Working – The Duty to Co-operate

- 4.9 There are no proposals to set up a joint planning board with neighbouring authorities. Whilst such initiatives may provide value to the process elsewhere, there is no evidence to suggest that a joint planning board is required in northeast Surrey.
- 4.10 Nevertheless, we continue to work with other Surrey Districts and with Surrey County Council on sharing best practice, undertaking Sustainability Appraisals and where appropriate undertaking other initiatives. We have also been actively involved in joint projects with neighbouring authorities on subjects such as establishing a methodology for preparing Traveller Accommodation Assessments, preparing Strategic Housing Market Assessments, and managing flood risk (specifically in relation to the Hogsmill River). We continue to work effectively with colleagues across Surrey on strategic infrastructure planning.
- 4.11 We continue to explore meaningful mechanisms by which we can discharge our Duty to Co-operate with neighbouring local planning authorities and other

¹² There are current two post holders in part time roles that collectively comprise the equivalent of 1.2 full time posts.

key partners. We are already working closely with our immediate neighbours in the East Surrey local authorities, and have a positive relationship with Surrey County Council and the wider Surrey local authorities. We believe that we can build upon these existing relationships to achieve a broad consensus on future plan making. We will explore the opportunities that may be available to meet the objectives of the Duty to Co-operate through our membership of the Coast to Capital Local Enterprise Partnership and Gatwick Diamond groups.

- 4.12 Many of the Surrey local planning authorities are signatories to the County-wide Local Strategic Statement. This document provides a framework for discussing, considering and potentially reaching an agreed position on strategic planning matters. It is anticipated that this will soon be expanded to include planning for infrastructure, housing growth and consideration of Green Belt related issues.
- 4.13 Our relationship with the Greater London Authority and the London boroughs that neighbour us to the north and northwest, have historically been less developed. We are forging new relationships with our neighbours to the north through continued active involvement in the London Plan process. The first stage of the Duty to Co-operate process¹³ has developed our strategic planning relationship with our immediate neighbours in Greater London. This will be evidenced in detail in the Duty to Co-Operate Position Statement, which we anticipate publishing at the Regulation 18 Part 2 stage of the process.
- 4.14 However, we highlight that the differences in national planning policy relating to London actively serve to distance us from our colleagues in London. Indeed, the strategic status of the London Plan could be interpreted as a disincentive to positive co-operation. As a consequence, whilst we may strive for a positive relationship with our neighbours to the north, the desire for fruitful co-operation may not be fully reciprocated. This continues to be an area of significant risk that lies beyond our ability to influence.
- 4.15 Finally, recent local examination reports are forcing us to reconsider how we respond to specific strategic issues through the Duty. It is becoming clear that the Duty, and how it is discharged, continues to evolve. Previous approaches to discharging the Duty no longer appear to have currency with Local Plan Inspectors – who now appear to require that neighbouring authorities prepare and adopt agreed strategies to address key issues. In particular we anticipate that we will be required to demonstrate how we will work collectively with our neighbours (including within our housing market area) to address unmet housing need. We will seek to meet this possibility.

Project Management

- 4.16 The new Local Plan is a corporate priority for the Borough Council. Consequently the Local Plan Programme is an important project management document. Progress on the Local Plan will be reported regularly to the Chief Executive, Committee Chair and the Borough Council's Leadership Team.

¹³ The Borough Council's Licensing and Planning Policy Committee considered a [Duty to Co-operate Engagement Plan](#) on 15 November 2018. This noted that initial meetings, starting from Autumn 2018, with the Royal Borough of Kingston; Elmbridge; Mole Valley; the Greater London Authority; the London Borough of Sutton and Reigate & Banstead would identify and confirm the strategic issues relevant to that discussion.

Council Procedures

4.17 For matters relating to the new Local Plan, the following reporting protocols will apply:

- Licensing and Planning Policy Committee will be responsible for the preparation, production and completion of all local plan documents; and
- Full Council will be responsible for the formal adoption of all local plan documents following consultation and examination.

Risk Management

4.18 The main areas of risk are considered to be:

- **Legal Challenge:** We will ensure that Local Plan documents are sound, positively prepared, justified, effective and consistent with national planning policy. However, on the basis of recent developments elsewhere in Surrey there is a risk, particularly post-examination, that our new Local Plan becomes the subject of legal challenge; such as a judicial review.
- **Staff Retention, turnover and capacity:** This continues to be an area of significant risk to the Local Plan process. The loss of experienced members of staff continues to be an issue. Nationally, there is a shortage of experienced planning policy Officers. This position is particularly acute in relation to Officers at management and senior level. There are a diminishing number of Officers with local plan inquiry or examination experience – in respect of preparing and presenting evidence to the Inspector. We remain mindful that the loss of our experienced planning policy staff will have an impact on our ability to meet our Local Plan Programme. Where it is not possible to recruit to vacant posts promptly, resources will inevitably be stretched with wider implications on timeframes likely Staffing capacity has been affected due to the COVID-19 implications on time as a result of restrictions. In the near future, it is anticipated that where lock down restrictions ease, there are still likely to be implications on staffing capacity if staff have to self-isolate or become unwell due to COVID-19 or if lockdowns need to be locally re-imposed.
- **Changes in government:** The short lifespan of our previous Local Plan Programme serves to remind us of unanticipated and extraordinary areas of risk. The currently fluid nature of national politics is an area of risk. The continued rise of populism could result in reactionary measures that impact upon our plan-making process. By its nature this area of risk is unpredictable.
- **Changes in national Legislation:** Due to COVID-19, government legislation and guidance in England has undergone significant unanticipated adaption with respect to the economy, environment, health, social and community facilities and infrastructure. This includes changes to some planning practices and procedures and the introduction of new or proposed legislation to temporarily change of use of restaurants and cafes to allow takeaway food, extending time limits on unimplemented permissions, and fast-tracking applications to amend conditions relating

to operating hours on construction sites. Further regulations have been published that introduces new permitted development right to allow blocks of flats to be extended upward by two storeys to create new homes, effective from 1 August. In addition, other changes to planning are proposed to come in by September 2020 including;

- Amendments to the Use Class order to allow more commercial buildings to change use without requiring planning permission. For example a building used for retail could be able to be permanently used as a café or office without requiring a planning application and local authority approval
- A wider range of commercial buildings allowed to change to residential use without the need for a planning permission which can bypass aspects such as space standards
- A planning application will not be needed to demolish and rebuild vacant and redundant residential and commercial buildings if they are rebuilt as homes

Further reforms to the planning system are expected to be outlined imminently by the end of July 2020 (detail are yet to be published at the time of writing this document). This is following the Budget announcements and the 'Planning for the Future' paper where government committed to modernising the planning system. The recent pandemic has likely prompted more consideration of the level of reform.

It is important that we maintain forward momentum and prepare our new Local Plan in accordance with national policy. However, amendments to national planning policy may necessitate a change of direction. We will seek to minimise any collateral impacts by consulting with Members on possible solutions, which may include revisiting the Local Plan Programme.

- **Availability of Planning Inspectors:** Early notification of our new Local Plan Programme will forewarn the Planning Inspectorate of our anticipated timetable. The Programme will be passed to the Planning Inspectorate to aid their project management of future examinations. The Inspectorate will then enter into Service Level Agreements with us to ensure that they make adequate resources available for future stages of the process. This will help minimise the risk of delays to adoption dates.
- **High Levels of Response to Public Consultation Stages:** Experience from elsewhere in Surrey has shown that this can have an impact on the Programme timetable – due to the number of responses involved. We will seek to manage this risk by ensuring that an appropriate level of resource can be deployed to manage significant number of responses. Other areas of risk associated with this issue are difficult to predict and manage. We will seek to address some of these areas by adopting a clear communication strategy, which will seek to set out the challenges that the Borough Council faces. In light of the impacts of COVID-19, it anticipated that our approach will need to be adjusted to comply with government guidance to ensure that staff and consultee engagement practices are COVID-19 safe.

- **A wildly evolving Duty to co-operate:** The absence of firm guidance and regulation relating to the Duty has always made it an aspect of the process where risk thrives. In the past an exchange of anodyne communications between authorities has proved sufficient to placate Inspectors. This is no longer the case – recent decisions suggest that Inspectors are seeking greater certainty that local planning authorities are genuinely working together to address strategic issues. We believe that this constitutes sound planning and consequently we will rise to this challenge. However, in the continued absence of guidance and regulation risk remains as the Duty may evolve in new and unexpected directions. Our proximity to greater London and the entirely different strategic regime that functions there suggests that risk from that area is high. We will continue to monitor and engage in the development of local plans in both the London Borough of Sutton and the Royal Borough of Kingston. We will try to understand and accommodate the developments in the Duty that spring from those processes. We will continue to seek to work with our partners in London – trying to establish and maintain the best relationship possible under these circumstances.
- **Unsettled economic climate:** The COVID-19 global pandemic has resulted in a sequence of rapid changes globally with immediate fundamental impacts on people's everyday lives. In the short term, lock down restrictions have had implications on most aspects of society and whilst longer-term impacts are uncertain, it is likely that the pandemic will have lasting effects on the economy. Changes to planning legislation and the planning system have begun and future significant reform has been announced by government.

There is further risk from the period following Brexit which may result in another period of uncertainty. The UK left the EU in 31 January 2020 and the UK is in a transitional period before new rules come in from 1 January 2021. Consequently, we may need to prepare new evidence and re-draft policy alongside any developments in this area. This will have an impact upon the proposed timetable. Given the unknown nature of this risk there is little that we can introduce as mitigation.