

**Town and County Planning Act 1990
Section 78 (As Amended)**

**PLANNING STATEMENT OF COMMON
GROUND**

Prepared by:

**Woolf Bond Planning Ltd
for Fairfax Aspire Ltd**

and

Epsom & Ewell Borough Council



Farm View, Langley Vale Road, Epsom, KT18 6AP

**PINS Ref: 6006971
LPA Ref: 25/00846/OUT
WBP Ref: 9204**

July 2026

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1.0. INTRODUCTION

- 1.1. This Statement of Common Ground (“SoCG”) relates to a Town and Country Planning Act 1990 Section 78 Planning Appeal lodged by Woolf Bond Planning Ltd on behalf of Fairfax Aspire Ltd, against Epsom & Ewell Borough Council’s decision to refuse outline planning permission for up to 110 dwellings, with all matters reserved except for access from Langley Vale Road (LPA Ref: 25/00846/OUT) (“the Application Scheme”, now “the Appeal Scheme”) on land at Farm View, Langley Vale Road (the “Application Site”, now the “Appeal Site”). All matters other than access are reserved.
- 1.2. The Statement records the matters upon which the parties have agreed with the intention of leading to the preparation of more focused proofs of evidence.
- 1.3. Additional Topic-based Statements of Common Ground. will be prepared between the Appellant and the LPA as follows: (i) Affordable Housing, (ii) Heritage; (iii) Ecology; and (iv) Landscape. A separate Highways SoCG will be prepared with Surrey County Council as the Local Highway Authority.

2.0. DESCRIPTION OF THE APPEAL SITE AND SURROUNDING AREA

- 2.1. The Appeal site extends to approximately 5.2ha.
- 2.2. The Site comprises agricultural land that generally rises from west to east up towards the settlement boundary of Langley Village.
- 2.3. The village of Langley Vale is located to the immediate east of the Site, whilst a scheme for 20 dwellings is currently under construction to the west. The south east corner of the Appeal Site abuts an area of Ancient Woodland known as 'The Warren'
- 2.4. The Appeal Site is served by existing vehicular access via Bridleway 33 on its western boundary. A further access from bridleway 127 is located on the Site's southern boundary. Both points operate as vehicular and pedestrian access to the Site.
- 2.5. The Appeal Site is within the Green Belt. The site forms part of the Langley Bottom Farm Site of Nature Conservation Importance (SNCI). The parties disagree as to whether the Site is within the Surrey Hills Area of Great Landscape Value (AGLV).
- 2.6. The Site is not located within a Conservation Area. However, there are statutory listed buildings within the vicinity of the Site. The nearest heritage assets to the Site are:
 - The Grade II listed Wall Bordering North West and South Sides of The Warren (entry number 1213778) which is to the immediate south east of the Appeal Site.
 - The Grade II listed Boundary Wall to Woodcote Park Extending from Opposite Pumping Station to Corner with Chalk Pit Road (entry number 1232240) which is located on the north side of Langley Vale Road to the immediate north west of the Appeal Site.
 - The Grade II listed Coal Tax Post to South East of Langley Bottom Farm (entry number 1277034) which is approximately 250m to the south of the Appeal Site.
- 2.7. Ashted Park Local Nature Reserve (LNR) is approximately 1.2km to the northwest of the Appeal Site, and Epsom Common LNR is approximately 1.3km to the north of the Appeal Site.
- 2.8. The Site is located wholly within Flood Zone 1 whilst the northwestern end of the Site, fronting onto Langley Vale Road, is subject to surface water flooding in the 1 in 30-year event.
- 2.9. On 14 July 2022, planning permission was granted on appeal on land near to site (Langley Bottom Farm) for 20 dwellings (PINS Ref: 3280881). It is located further from Langley Vale than the subject Appeal Site and was found by the Inspector to be a sustainable location. The same finding was made in relation to appeal APP/P3610/W/25/3359376.

- 2.10. One of the main issues considered by the Inspector in that appeal was whether the site was in a sustainable location. The Inspector found that whilst the development at the appeal site would not be significant development, it would provide opportunities for residents to take up sustainable transport modes, which is the essential element of paragraph 110 of the NPPF.
- 2.11. On 18 July 2025, an appeal was dismissed for a single dwelling at Langley Bottom Farm (PINS Ref: 3359376). In considering whether the appeal site was in a sustainable location, the Inspector concluded that given the evidence before them, including the appeal decision for Langley Bottom Farm, the appeal site would be in a sustainable location.
- 2.12. The parties agree the decisions are material to this Appeal.

The Appeal Site

- 2.13. Matters of disagreement relating to the characteristics of the Appeal Site are outlined at Section 6.
- 2.14. The Appeal Site adjoins the settlement of Langley Vale. A parcel of land to the south of the Appeal Site is being developed for 20 dwellings, which was allowed at appeal¹.
- 2.15. The Appeal Site has been assessed by the Council as comprising a weakly-performing Green Belt Site with regards to purposes a) and b). It makes no contribution to purpose (d).
- 2.16. The adopted Proposals Map indicates that the site is not covered by any statutory designations for landscape character or quality. The site is located within the Green Belt as defined in the Core Strategy.
- 2.17. Although public access to the Site is limited, there is an existing bridleway (BW13) that runs adjacent to the Site's western boundary, offering a connection to the wider public footpath network. New public access routes through the Site will be created, with permissive footpath routes to be formalised and the public to be provided with access to publicly accessible open space and recreational areas.
- 2.18. There are a limited number trees within the site with only a few sparse trees fronting onto Langley Vale Road present within the site. None are subject to a TPO or identified as veteran trees by the Council. A patch of Ancient Woodland, known as The Warren, neighbours the site to the east and forms a green buffer between the eastern end of the Site and Langley Vale.
- 2.19. The arboricultural impact assessment provides an assessment of the conditions of the trees and their amenity values. The submitted Parameters Plan (no. 2503/PL03 Rev C) shows that suitable landscape buffers to protect the integrity of the Ancient Woodland are accommodated within the development proposal. Whilst this is an outline scheme, the Parameters Plan highlights the landscaping and structural planting to be provided.

¹ PINS Ref: APP/P3610/W/21/3280881

- 2.20. The Site falls entirely within Flood Zone 1 of the Environment Agency (EA) Flood Map for Planning. EA mapping also confirms that the site is predominantly at very low risk of flooding from surface water save for a small section in the northwest corner of the Site along the frontage with Langley Vale Road. The Site is also at very low risk from river and reservoir sources of flooding.
- 2.21. As to the assessment of landscape considerations, the site forms an open piece of land between the settlement of Langley Vale and an under construction development for 20 homes allowed at Appeal².

² PINS Ref: APP/P3610/W/21/3280881

3.0. THE APPEAL SCHEME

The Appeal Scheme Description

3.1. The Appeal Scheme description is as follows:

“Outline application for up to 110 dwellings including affordable homes (all matters reserved except access from Langley Vale Road)”

3.2. Only the principle of developing the Site for up to 110 dwellings and the means of access are to be determined as part of this outline application/Appeal.

3.3. The Appeal Scheme secures 50% affordable housing.

3.4. Appearance, landscaping, layout and scale are reserved for subsequent determination.

3.5. The Appeal Scheme is set out on the following plans:

The Scheme

- Site Location Plan No. 2503/PL.01 Rev B
- Parameters Plan No. 2503/PL.03 Rev C
- Proposed Site Access Arrangements No. ITB200788-GA-002 Rev E
- As planning permission is sought for the principle of the proposed uses and the means of access, the plans to be ‘approved’ as part of the appeal comprise (i) Site Location Plan No. 2503/PL.01 Rev B, (ii) Parameters Plan No. 2503/PL.03 Rev C, and (ii) Proposed Site Access Arrangements No. ITB200788-GA-002 Rev E

3.6. It is suggested that the Parameters Plan No. 2503/PL.03 Rev C will be subject to a ‘general conformity’ condition to be imposed upon the grant of planning permission.

3.7. As detailed within the DAS, storey heights are proposed at predominantly 2-storey.

The Submitted Application Plans and Particulars

General

3.8. The planning application submitted to the LPA included a number of plans and particulars, the details of which are set out below.

Application as Originally Submitted (August 2024)

Forms & Technical Documents

- Application Form
- CIL Form
- Cover Letter (Boyer)
- Planning Statement (Boyer)

- Affordable Housing Needs Assessment (Boyer)
- Agricultural Land Classification and Considerations (Kernon)
- Arboricultural Impact Assessment (Arbortrack Systems)
- Archaeological Desk-Based Assessment (ASE)
- Design & Access Statement (Paul Hewitt)
- Ecological Impact Assessment (Ecology Co-op)
- Biodiversity Impact Calculation (Ecology Co-op)
- Enhanced Sustainable Transport Strategy (i-Transport)
- Flood Risk Assessment & Outline Drainage Strategy (Aqua Terra)
- Framework Travel Plan (i-Transport)
- Geo-Environmental Desk Study (Aqua Terra)
- Green Belt Assessment (Fabrik)
- Heritage Statement (ASE)
- Landscape & Visual Impact Assessment (ASE)
- Landscape Statement (Fabrik)
- Energy & Sustainability Assessment (Pinnacle)
- Statement of Community Involvement (Fairthorne)
- Transport Assessment (i-Transport)

Plans

- Site Location Plan No. 2503/PL.01 Rev B
- Parameters Plan No. 2503/PL.03 Rev C
- Proposed Site Access Arrangements No. ITB200788-GA-002 Rev E

Additional Information – September 2025

- Developer Response to 3rd Party Comments (Boyer)

4.0. PLANNING POLICY

The Development Plan

- 4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out a requirement that planning applications are to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 4.2. The approved Development Plan comprises the following:
 - Epsom & Ewell Core Strategy (Adopted 2007)
 - Development Management Policies Document (Adopted 2015)
- 4.3. The settlement boundaries in the adopted Core Strategy were identified to provide for a net increase of 3,620 dwellings in the period 2006 to 2026 (181dpa). The Green Belt boundaries were not reviewed as part of the spatial strategy.
- 4.4. In so far as the Core Strategy is more than five years old, and in accordance with the requirements in paragraph 78 and footnote 39 of the NPPF, the housing requirement falls to be determined by the local housing need derived from the application of the standard method.
- 4.5. The current housing need for the Borough, derived from the application of the standard method, is 834 dwellings annually. A 20% buffer is then added (to reflect the Housing Delivery Test results).
- 4.6. This results in an annual need in the Borough for 1,001dpa. This substantially exceeds the 181dpa housing requirement identified in the Core Strategy.
- 4.7. It is agreed that the settlement boundaries associated with the Development Plan area are out of date as they need to be breached if the housing requirement is to be met. Separately, the Council is not able to demonstrate a five-year supply of deliverable housing land. Either position engages the presumption in favour of sustainable development at paragraph 11(d) of the NPPF.
- 4.8. Applicable Core Strategy (2007) policies comprise:
 - CS1: Sustainable Development
 - CS2: Green Belt
 - CS3: Biodiversity & Designated Nature Conservation Areas
 - CS4: Open Spaces & Green Infrastructure
 - CS5: Historic Environment
 - CS6: Sustainable Construction & Design
 - CS7: Housing Provision
 - CS8: Spatial Strategy
 - CS9: Affordable Housing
 - CS12: (Infrastructure Delivery
 - CS16: managing Transport and Travel

4.9. Applicable Development Management Policies Document (2015) comprise:

- DM1: Extent of the Green Belt
- DM3: Replacement and extensions of buildings in the Green Belt
- DM4: Biodiversity and New Development
- DM5: Trees and Landscape
- DM6: Open Space Provision
- DM7: Footpath, Cycle and Bridleway Network
- DM8: Heritage Assets
- DM9: Townscape Character and Local Distinctiveness
- DM10: Design Requirements for New Developments
- DM11: Housing Density
- DM12: Housing Standards
- DM13: Building Heights
- DM17: Contaminated Land
- DM19: Development & Flood Risk
- DM21: Meeting Local Housing Needs
- DM22: Housing Mix
- DM23: Gypsy and Traveller Sites
- DM35: Transport and New Development
- DM36: Sustainable Transport for New Development
- DM37: Parking Standards

4.10. The following documents are also material considerations relevant for the determination of this appeal:

- Parking Standards for Residential Development Supplementary Planning Document 2015
- Sustainable Design Supplementary Planning Document 2016
- Surrey Transport Plan 2022–2032
- Surrey County Council Vehicular, Electric Vehicle and Cycle Parking Guidance for New Developments 2023
- Surrey County Council's Local Transport Plan 4 (LTP4)
- Natural England Guide to Assessing Development Proposals on Agricultural Land 2021
- Green Belt Study Update, November 2024
- Emerging Local Plan Site Assessment Methodology September 2024
- Emerging Local Plan Land Availability Assessment September 2024
- The NPPF and PPG

4.11. The MHCLG published a major draft revision of the NPPF for public consultation, which concluded in March 2026. The parties agree that as of the date of this SoCG, the draft text does not constitute Government policy or guidance. As a consultation document, it may also be subject to change. Accordingly, whilst the parties have taken the draft text into account, presently it attracts limited weight.

4.12. Additional national planning policy and guidance considered relevant to the appeal proposals include:

- National Planning Practice Guidance (“PPG”)
- Conservation of Habitats and Species Regulations 2017, as amended.
- Environment Act 2021

Five Year Housing Land Supply

4.13. The Council cannot currently demonstrate a five-year supply of deliverable housing land for the five-year period 1st April 2026 to 31st March 2031.

4.14. The agreed five-year housing land supply position is as follows:

Annualised Requirement	834
Five year Requirement	4,170
20% Buffer	834
Total Five Year Requirement:	5,004 (1,001dpa)
Supply	1,602
Shortfall	-3,402
Yrs Supply	1.60

4.15. In preparing this SoCG, the Council has not agreed the weight to be ascribed to the benefit of affordable housing and market housing with the Appellant, stating that it is a matter for evidence because the parties disagree on whether this is a combined benefit or separate benefits. The Appellant considers the approach to be unreasonable and not helpful.

Green Belt

The Five Green Belt Purposes

4.16. Paragraph 143 of the NPPF sets out the five Green Belt purposes.

4.17. The parties agree that the Appeal Site does not strongly contribute to purposes (a), (b), or (d) of the Green Belt.

Grey Belt

4.18. Paragraph 155 of the NPPF introduces the concept of ‘grey belt’ land, which enables the development of homes, commercial or other development in the Green Belt not to be regarded as inappropriate if specified conditions are met.

4.19. ‘Grey belt’ is defined in the Glossary to the NPPF as land in the Green Belt that does not strongly contribute to any of purposes (a), (b) or (d) in paragraph 143 of the NPPF. However, it excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing development.

- 4.20 The specific conditions at paragraph 155 of the NPPF that would need to be satisfied by the Appeal Scheme are as follows:
- a) The development would need to utilise grey belt land and would not fundamentally undermine the purpose (taken together) of the remaining Green Belt across the area of the plan;
 - b) There is a demonstrable unmet need for the type of development proposed;
 - c) The development would be in a sustainable location; and
 - d) The development meets the 'Golden Rules' requirements set out in paragraphs 156 and 157 of the NPPF.
- 4.21 Having regard to paragraph 155, it is agreed that (a) the Appeal Site constitutes Grey Belt land; (b) there is a demonstrable unmet need for the Appeal Scheme (due to the lack of a five year supply of deliverable housing land); and (d) the Appeal Scheme complies with the Golden Rules at paragraphs 156 and 157 of the NPPF.
- 4.22 Accordingly, the only dispute between the Appellant and the Council with regard to paragraph 155 is as to whether the Appeal Site is not inappropriate development is whether the Appeal Scheme would be in a sustainable location (paragraph 155 (c)).
- 4.23 In accordance with paragraph 156 of the NPPF, the Appeal Scheme makes the following contributions:
- Affordable housing (50%)
 - Secures monetary contributions through the S106 towards local infrastructure; and
 - Provides publicly accessible open space
- 4.23 In accordance with paragraph 157 of the NPPF, the Appeal Scheme secures 50% affordable housing (subject to receipt of a signed S106 Agreement).
- 4.24 In the circumstances, it is agreed that the Appeal Scheme satisfies the 'Golden Rules' at paragraphs 156 and 157 of the NPPF. Part (d) above refers.
- 4.25 In accordance with the approach set out at paragraph 158 of the NPPF, compliance with the Golden Rules attracts significant weight in favour of the grant of planning permission.
- 4.26 Although there is disagreement between the Council and the Appellant in relation to the locational sustainability of the Appeal Site, it forms no part of the Council's case that there are any footnote 7 considerations (save for Green Belt (if the Site is found not to comprise grey belt land)) that would otherwise represent provide a strong reason to refuse the proposed development.
- 4.27 If the Inspector concludes the Appeal Site/Scheme is sustainably located and it accords with the Golden Rules, the Appeal Scheme represents appropriate development and should be positively determined in accordance with the presumption in favour of sustainable development at paragraph 11(d)(ii) of the NPPF.

- 4.28 However, if the Inspector concludes the Appeal Site would not accord with paragraph 155(c), the Appeal Scheme would represent inappropriate development and should only be approved in very special circumstances. This is the paragraph 153 balance.
- 4.29 These matters will be addressed in evidence.

Inappropriate Development

- 4.30 Paragraph 153 of the NPPF explains that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. It adds that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 4.31 The parties agree that none of the exceptions at paragraph 154 of the NPPF are engaged by the Appeal Scheme.
- 4.32 If the Appeal Scheme is not found to meet all the requirements of paragraph 155, the merits of the proposal would fall to be determined under the approach at paragraph 153 of the NPPF.
- 4.33 In that scenario, the Appeal Scheme would constitute definitional harm to the Green Belt. It would also result in spatial and visual harm to the openness of the Green Belt; and conflict with purpose (c) (encroachment) (paragraph 143 of the NPPF). The parties will ascribe weight to openness harm and conflict with purpose c) in their respective proofs.
- 4.34 Whether the Green Belt harm and any other harm resulting from the proposal is clearly outweighed by other considerations is a matter to be addressed in evidence.

5.0. MATTERS NOT IN DISPUTE

Presumption in Favour of Sustainable Development

- 5.1 It is accepted that the Council is not currently able to demonstrate a five-year supply of deliverable housing land against the Standard Method.
- 5.2 The development policies for the supply of housing are out of date and it is agreed that paragraph 11(d) of the NPPF is as such initially engaged. Whether 11(d) is subsequently disengaged due to being determined to be inappropriate development in the Green Belt is a matter for the parties evidence.
- 5.3 It is agreed that the Appeal Site does not make a strong contribution to Green Belt purposes (a), or (b) at paragraph 143 of the NPPF. It is also agreed that purpose (d) is not a relevant consideration, as Langley Vale is not a historic town. It is also agreed that there is no significant conflict with purpose (e).

Green Belt

- 5.4 Having regard to paragraph 155 of the NPPF, and for the reasons explained in section 4 above, it is agreed that (a) the Appeal Site constitutes Grey Belt land, (b) there is a demonstrable unmet need for the Appeal Scheme (due to the lack of a five year supply of deliverable housing land); and (d) the Appeal Scheme complies with the Golden Rules at paragraphs 156 and 157 of the NPPF.
- 5.5 If the Inspector concludes the Appeal Site/Scheme is sustainably located, accords with the Golden Rules and as such accords with para 155, the Appeal Scheme represents appropriate development and should be positively determined in accordance with the presumption in favour of sustainable development at paragraph 11(d)(ii) of the NPPF.
- 5.6 However, if the Inspector concludes the Appeal Site/Scheme is not in accordance with para 155, the proposal represents inappropriate development and should only be approved in very special circumstances. This is the paragraph 153 balance.

Other Matters

- 5.7 It is agreed that the Appeal Site is not within a valued landscape.
- 5.8 It is agreed that the Appeal Site is not within a Conservation Area nor are there any statutory or locally listed buildings upon the Site itself. The parties agree that in having regard to paragraph 215 of the NPPF, the public benefits of the proposed development would outweigh any purported harm to the setting of nearby Grade II listed buildings.
- 5.9 It is the Council's case that the Appeal Scheme would result in less than substantial harm to the Wall Bordering North West and South Sides of The Warren, to a limited level on the spectrum. The Appellant's case is there will be no harm.

- 5.10 Notwithstanding the 215 position above, in a circumstance where the development is concluded to be inappropriate development in the Green Belt, this harm needs to be ascribed weight as “other harm”.
- 5.11 It is agreed that the Appeal Scheme is acceptable in drainage terms and can be made safe for its lifetime.
- 5.12 It is agreed that the Appeal Scheme is acceptable in relation to ecological matters, subject to ensuring the necessary mitigation.
- 5.13 If the Inspector finds that the Appeal Site is sustainably located, the Scheme falls to be positively determined under paragraph 11(d)(ii) of the NPPF.
- 5.14 It is accepted that Epsom & Ewell is a CIL Charging Authority and financial contributions will be secured at the reserved matters stage once the amount of chargeable floorspace is fixed.

Planning Balance

Benefits

- 5.15 The parties agree that the following are the benefits of the scheme in planning terms, and will attribute weight to these benefits within their respective proofs.
- Provision of up to 110 new homes including 50% affordable housing.
 - Economic benefits including job creation during construction and economic spend of residents into the local economy.
 - Proposed delivery of public open space, children’s play area and landscaping.
 - Enhancement of Langley Bottom Farm Site of Nature Conservation Importance.
 - Delivery of biodiversity net gain.

6.0. MATTERS IN DISPUTE

6.1 The planning matters presently in dispute, to be addressed in evidence, comprise as follows:

- a) Whether the Site is sustainably located with respect to Section 9 and paragraph 155 c) of the NPPF (Reason for Refusal 1)
- b) Whether the proposal would strongly contribute to purpose c) of paragraph 143 of the NPPF (Reason for Refusal 2). The Officer Report to Committee identifies the contribution as 'moderate'. The Council do not consider the Officer Report to be a part of their appeal case but recognise it is a material consideration for the Inspector.
- c) Whether the proposal is inappropriate development within the Green Belt. If the Appeal Site is found to be unsustainably located and so does not benefit from the exception of paragraph 155, whether the proposal is therefore subject to the paragraph 153 balance, and whether potential harm to the Green Belt and any other harm is clearly outweighed by other circumstances, so as to amount to very special circumstances to justify the grant of planning permission (Reason for Refusal 2).
- d) Whether the proposal would harm Green Belt openness.
- e) The extent to which the development would have an adverse impact on the landscape and the surrounding area (Reason for Refusal 3).
- f) The extent to which the AGLV is an active local landscape designation (Reason for Refusal 3).
- g) The impact of the Scheme upon the character and appearance of the area (Reasons for Refusal 2 and 3)
- h) The weight to be ascribed to the agreed benefits of the proposal, including whether weight ascribed to affordable housing provision is distinct from the weight ascribed to contribution to housing supply.
- i) The scale to be used to ascribe weight to benefits.

7.0. HEADS OF TERMS FOR LEGAL AGREEMENT

- 7.1. It is agreed between the parties that the Appellant will provide planning obligations, in the form of an undertaking under Section 106 of the Town and Country Planning Act (1990) in favour of Epsom and Ewell Borough Council and Surrey County Council.
- 7.2. The legal agreement will ensure the financial contributions and other compliant obligations to enable the proposed development to go ahead are provided in accordance Regulation 122(2) of the Community Infrastructure Levy Regulations and the content at paragraphs 56, 57 and 58 of the NPPF.
- 7.3. Subject to meeting the necessary tests at paragraph 58 of the NPPF, it is considered that the following may be provided for in a legal agreement:
 - Affordable Housing (50%) (up to 55 dwellings)
 - On-site public open space provision
 - Sustainable Transport/Travel Plan
- 7.4. The legal agreement will be completed during the Inquiry.

8.0. CONDITIONS

- 8.1. It is agreed that there should be a schedule of conditions agreed between the parties, for discussion with the Inspector during the Inquiry. The schedule will be compiled and submitted to the Inspector prior to the Inquiry.

9.0. CORE DOCUMENT LIST

- 9.1. It is agreed that there should be a common list of reference documents and these are to be referenced as Core Documents to the Inquiry. The list will be compiled, and a full set of the documents will be provided for the Inspector.

10.0. AGREEMENT: SCHEDULE OF COMMON GROUND

- 10.1. This document is accepted as the agreed Statement of Common Ground for the Appeal being considered under PINS Ref: 6006971.
- 10.2. It has been duly signed by representatives of the Appellant (Fairfax Aspire Ltd.) and Epsom & Ewell Borough Council.

Signed: *Steven Brown*..... on behalf of Fairfax Aspire Ltd (the Appellant).

Steven Brown (BSc Hons DipTP MRTPI)

4th August 2026

NAME

DATE

Signed...  on behalf of Epsom & Ewell Borough Council

Christopher Whitehouse MRICS BSc (Hons)

...04.08.26

NAME

DATE