

Consultation Statement

Summary of responses received at Regulation 18

December 2024

Epsom and Ewell
Local Plan 2022-2040



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Introduction

1. The consultation statement sets out how Epsom and Ewell Borough Council (EEBC) undertook engagement and consultation in preparation of Epsom and Ewell's Local Plan.
2. The document describes key issues raised in EEBC's draft Local Plan 2022-2040 Regulation 18 consultation which took place between 1st February and 19th March 2023 and how these have been taken account of in preparation for Regulation 19.
3. The Regulation 18 consultation, which was undertaken by the Council, is part of the statutory requirements for consultation and engagement is set out in the Town and Country Planning (Local Development) (England) Regulations 2012 the Regulations). The Regulation 18 consultation stage provided the opportunity for residents, interested parties and relevant organisations to be included in EEBC's local plan. The council sought views and comments on the draft local plan which provided an opportunity for individuals to consider and contribute their comments on key planning issues within EEBC's draft local plan.

Engagement

4. The Council has engaged with stakeholders continuously during the preparation of the Local Plan and as part of the duty to cooperate. EEBC's draft Local Plan 2022-2040 Regulation 18 consultation took place between 1st February and 19th March 2023. That plan contained the strategy and sites to guide how the borough will change and develop over the plan period up until 2040 as well as detailed development management policies.
5. The draft Local Plan set out a proposed spatial development strategy (the "what", "where" and "when") including the level and location of development. It also proposed the allocation of 9 sites to contribute towards meeting development needs as well as offering high level and detailed guidance on important matters such as economic development, the provision of housing and the protection and enhancement of the environment over the plan period. This consultation summary statement details the Regulation 18 consultation that took place between the 1st of February and 19th of March 2023.

Publicising the consultation

6. The Council publicised the Regulation 18 consultation in a variety of ways. This included;
 - Advertising the consultation on community notice boards, posters and leaflets in key locations within the borough (e.g., libraries, shops, cafes) and high footfall venues;
 - A sizable 23m long static display in the Ashley Centre in Epsom Town Centre;
 - Social media (including targeted Facebook and Instagram advertising);
 - Traditional media, including a newspaper notice and multiple media releases in advance of, and during the consultation period.
 - The Local Plan Consultation was the main article in the January and March editions of e-Borough Insight, as well as being mentioned in the introduction and ‘featured in this issue’ section, which is shown on every page;
 - Council Website pages including the planning policy webpages and the council’s corporate webpages.
7. The social media posts through the Council’s channels had a total reach of approximately 40,462 users (while the reach numbers represent unique users for each platform, there may be some overlap of users between platforms).
8. In addition, the Council sent a formal notification to all stakeholders who had registered for updates on EEBC’s local plan on the planning policy consultation database. Stakeholders included individuals as well as organisations. A list of specific and general consultation bodies who were consulted is documented in Appendix B.
9. Examples of how the consultation was publicised and photos from the consultation events are set out in Appendix A.

Regulation 18 Consultation

10. During the consultation period the Local Plan documents and all the supporting evidence base could be accessed from the council’s [website](#) and [consultation platform](#). The evidence base that informed the Draft Local Plan (Regulation 18) can still be accessed on our webpage, however since this time additional or updated evidence base has been published.

11. Six drop-in sessions attended by planning officers totalling 30 hours were held during the six-week Regulation 18 consultation period where all members of the local community were invited to attend to find out more about the Draft Local Plan. The events were attended by approximately 600 people and enabled them to answer questions of council officers in attendance.

12. At the drop-in sessions, material was presented on display boards with hard copies of all supporting documents (including the full suite of evidence base) made available. Details of the six drop-in sessions are detailed below:

Venue	Date and Time
Bourne Hall, Azalea Room	Monday 13 February 14:30 – 19:30
Ashley Centre, Central Square	Thursday 16 February 12:00 – 17:00
Bourne Hall, Azalea Room	Tuesday 21 February 14:30 – 19:30
Community & Wellbeing Centre	Wednesday 22 February 10:30 – 15:30
Ashley Centre, Central Square	Saturday 25 February 11:00 – 16:00
Community & Wellbeing Centre	Tuesday 28 February 10:30 – 15:30

13. In addition to the consultation events, officers were available to attend meetings with external organisations (either in person or virtually) upon request.

14. For the duration of the consultation at the Epsom, Ewell Court, Ewell, Stoneleigh local libraries and Town Hall, the following documents were available to view during opening hours:

- Draft Local Plan 2022-2040
- Draft Local Plan Reg 18 -Policies map

- Interim Sustainability Appraisal Report
- Interim Sustainability Appraisal Non Technical Summary
- Habitats Regulations Assessment
- Local Plan - Schedule of Changes
- Local Plan Frequently Asked Questions
- Local Plan Made Easy Guide

15. In addition to the above, hard copies of the questionnaire supporting the consultation and a shorter feedback form were available to complete and return to the council.

16. Consultees were able to keep up to date on the preparation of the local plan by:

- Signing up for emails on future consultations using our consultation platform: <https://epsom-ewell.inconsult.uk/system/register>; and
- Contacting the Planning Policy team by email (localplan@epsom-ewell.gov.uk) stating their wishes to be kept informed of future consultations or telephone 01372 732000.

Next steps: following the Regulation 18 Consultation

17. Following the close of the consultation on the Draft Local Plan, on the 22 March 2023 an [Extraordinary Council Meeting](#) was held where a Motion was debated, with the Council agreeing that:

Other than for the purpose of analysing the responses of the public consultation to capture residents' views and any new information, the Local Plan process be paused to enable:

- a) further work on brown field sites, including information arising out of the Regulation 18 consultation
- b) further options to be considered that do not include green belt sites
- c) an analysis of Epsom and Ewell's required future housing numbers based on 2018 data
- d) a clearer understanding of the Government's legislative intentions in regard to protections for the green belt and the current mandatory target for housing numbers.

18. On the 15 June 2023 a Local Plan Update Report was considered by the [Licensing and Planning Policy Committee](#) (LPPC) to provide an update on the work undertaken following the decision on the 22 March by Council. The report made recommendations on the work that could progress prior to a decision being made at a future LPPC on a revised timetable for producing the Local Plan.

19. On the 24 October 2023, at an extraordinary Council meeting, the decision was made to un-pause the Local Plan and subsequently on the 22 November 2023 a revised Local Development Scheme (LDS) was approved by the Licensing and Planning Policy Committee. Since this time the council has kept its planning policy webpages up to date and has published a [Frequently Asked Questions](#) document which is a live document.

Stakeholders notified

20. Specific and general consultees that were notified about the Draft Local Plan 2022-2040 (Regulation 18) consultation were:

Neighbouring Authorities	<p>Elmbridge Borough Council Reigate and Banstead Borough Council Mole Valley District Council London Borough: Sutton London Borough: Kingston Runnymede Borough Council Waverley Borough Council Tandridge Council Surrey Heath Spelthorne Borough Council Guildford Borough Council Woking Borough Council</p>
County	<p>Surrey County Council</p>
Infrastructure	<p>The Coal Authority Transport for London National Gas Transmission owns and operates the gas transmission system (National Grid gas are no longer responsible for the national gas transmission system) National Grid National Gas Thames Water UK Power Networks National Highways (previously Highways England and Highways Agency) Gatwick Airport Civil Aviation Authority Southern Gas Network SES Water Network Rail Southern Gas Southwestern Railways Mobile UK</p>

	Surrey Police and Crime commissioner
House building	Home Builders Federation Homes England
Natural & Historic Environment	Environment Agency Historic England The Woodland Trust Natural England
Residents Associations / Local Interest Groups / Political Parties	Surrey Wildlife Trust Go Epsom London Plan/ Greater London Authority Surrey Coalition of Disabled People Epsom & Ewell Families Epsom Islamic Society Sustainable Epsom & Ewell Central Surrey Volunteer Association Sensory Services Age Concern Chair of Stamford and Horton Wards Residents' Association (SHoRA) Member of Parliament for Epsom and Ewell (Chris Grayling at the time the consultation was undertaken) CPRE Surrey The Jockey Club Civic Society Association of Ewell Downs Residents NHS Surrey Heartlands Integrated Care Board (ICB), (NHS Property Services Ltd) NHS England Nonsuch Residents Association Stoneleigh & Auriol Neighbourhood Forum Liberal Democrats Epsom Common Association Green Party
Other groups	Surrey Police Gatwick Diamond Partnership

The responses

21. In total, 1,736 responses were received from individuals and organisations during the Regulation 18 consultation on the Draft Local Plan.

The breakdown of consultation responses submitted through the available methods were:

- Consultation platform only: 1,064 responses
- Email / letter / hard copy of questionnaire only: 583 responses
- Multi-channel: 89 responses

22. People were able to respond by completing the questionnaire online on the consultation platform, completing a paper feedback form, emailing, or sending a letter containing their feedback in the post to the council.

23. The comments submitted to the consultation covered various sections, sites, and policies in the plan. Some parts of the plan attracted a proportionately higher number of responses. These were primarily:

- Vision and Objectives
- Policy S1 – Spatial Strategy
- Policy SA6 – Horton Farm
- Policy SA8 – Land adjoining Ewell East Station
- Policy SA9 – Hook Road Arena
- Policy S16 – Infrastructure

24. In addition, a petition was submitted to the Council by the Epsom & Ewell Green Belt Group. The petition did not meet the Council's Petition Scheme criteria, and as a result we were unable to accept it. Our Petition Scheme can be found on our website ([Petitions | Epsom and Ewell Borough Council \(epsom-ewell.gov.uk\)](#)) and the relevant section is Paragraph 1.6(g):

“1.6 The following petitions will not be accepted by this Council:

(g) petitions about a planning decision, including a development plan document, any matter relating to a licensing decision.”

25. However, the petition has been counted as a single response to the Local Plan consultation attributed to Epsom & Ewell Green Belt Group.

Publication of the responses

26. A summary of the responses received, to the Regulation 18 consultation and subsequent actions, is presented in Appendix B.
27. All of the responses from individuals or organisations that were received during the consultation period are available on the Councils digital consultation platform at: https://epsom-ewell.inconsult.uk/connect.ti/draftlocalplan2022_2040/consultationHome
28. Any comments that were received during the consultation period, which were considered to be inflammatory, offensive or otherwise inappropriate have been redacted. Whilst the comments have gone through a redaction process to remove offensive comments from the published responses, it is possible that some comments remain publicly viewable that may be offensive to some people. Such comments are not the views of Epsom and Ewell Borough Council, and the council does not condone the use of potentially offensive language and/or remarks. If you come across any comments which you or others may find offensive, please email localplan@epsom-ewell.gov.uk and we will consider redacting them.

Call for sites

29. Alongside the consultation on the Draft Local Plan (2022-2040), a call for sites was undertaken. Information was received about LAA sites to provide up to date information about availability. Additional site suggestions were received, and information was also received about LAA sites to amend site boundaries and provide up to date information about availability. The Local Plan consultation closed on the 19 March 2023, however the deadline for responses to the Call for Sites consultation was extended to the end of July 2023. The information received during the 2023 call for sites has informed the 2024 version of the Land Availability Assessment (LAA).

Appendix A – Consultation materials

Press advert

Advertised in the Epsom Comet on the 9th of February

PUBLIC NOTICE
Epsom & Ewell Borough Council
PLANNING AND COMPULSORY PURCHASE ACT 2004
TOWN AND COUNTRY PLANNING ACT (LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012
REGULATION 18 DRAFT LOCAL PLAN CONSULTATION

Epsom & Ewell Borough Council has published a Draft Local Plan for public consultation. When adopted, this will replace the existing Local Plan and will shape development in the Borough up to 2040.

This notice is being made in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which requires that various bodies and stakeholders be notified that the Council is preparing a Plan and invite them to comment on it.

Where to view the documents

The Draft Local Plan, supporting documents and response form are available on the Council's website and consultation platform:

- <https://epsom-ewell.gov.uk/local-plan>
- <https://epsom-ewell.inconsult.uk/>

Copies of the draft Local Plan and supporting documents are also available for inspection at:

- Epsom & Ewell Borough Council, Town Hall, The Parade, Epsom, Surrey, KT18 5BY, between the hours of 9:00am and 5:00pm Monday to Friday
- all main libraries in the borough (please check individual library websites for opening hours)


Consultation period

The consultation period will run from 1 February 2023 to 19 March 2023, and you are invited to make representations at the earliest opportunity and no later than by the end of the Consultation Period.

Representations:

Formal written representations on the draft Local Plan are invited to be made in the following ways:

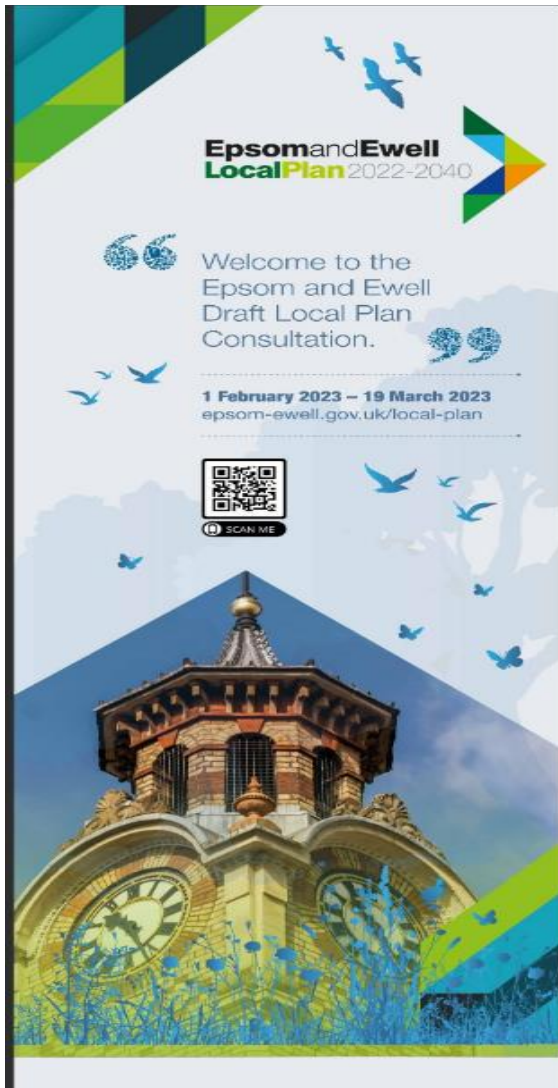
- Via the consultation portal <https://epsom-ewell.inconsult.uk/>
- By email with your comments to lplan@epsom-ewell.gov.uk
- By post to the Planning Policy Team at Epsom & Ewell Borough Council, Town Hall, The Parade, Epsom, Surrey, KT18 5BY



**EPSOM
& EWELL**
BOROUGH COUNCIL

Banners/Hoardings:

Banners that were displayed at the officer manned Local plan consultation events.



Epsom and Ewell Local Plan
 Regulation 19 Consultation

SITE ALLOCATIONS

**Epsom and Ewell
 Local Plan 2022-2040**

Strategic sites that make a significant contribution towards delivering our development needs.

- S41 Hook Road Car Park and SGN Site
- S42 Town Hall, Hope Lodge & Epsom Clinic
- S43 Depot Road and Upper High Street
- S44 Ashley Centre & Global House
- S45 Land at West Park Hospital
- S46 Horton Farm (Greenfield)
- S47 Land at Chantilly Way (Greenfield)
- S48 Land adjoining Ewell East Station (Greenfield)
- S49 Hook Road Arena (Greenfield)

Epsom and Ewell Local Plan
 Regulation 19 Consultation

HOW TO COMMENT

**Epsom and Ewell
 Local Plan 2022-2040**

Draft Local Plan Consultation.

1 February 2023 – 19 March 2023

- If you want to be informed or take part in this and future consultations, you can complete our online form epsom-ewell.inconsult.uk
- Alternatively, please email us at: localplan@epsom-ewell.gov.uk
- By writing to:
**Planning Policy,
 Town Hall, The Parade,
 Epsom KT18 5BY**

epsom-ewell.gov.uk/local-plan

Flyer:

Epsom and Ewell
Local Plan 2022-2040

Draft Local Plan Consultation.
1 February 2023 – 19 March 2023

We want you to have your say

Hard copies of the Draft Local Plan are available to view at the Town Hall and in Epsom and Ewell's libraries during opening hours. We will be holding six drop in events during the consultation period where you can speak to council officers and find out more about the Local Plan. The events are detailed below:

- **Monday 13 February 14.30 – 19.30:** Bourne Hall, Azalea Room
- **Thursday 16 February 12.00 – 17.00:** Ashley Centre, Central Square
- **Tuesday 21 February 14.30 – 19.30:** Bourne Hall, Azalea Room
- **Wednesday 22 February 10.30 – 15.30:**
Community & Wellbeing Centre, Sefton Road
- **Saturday 25 February 11.00 – 16.00:** Ashley Centre, Central Square
- **Tuesday 28 February 10.30 – 15.30:**
Community & Wellbeing Centre, Sefton Road

epsom-ewell.gov.uk/local-plan


e-BOROUGH INSIGHT

Keeping you informed

Issue 98: January 2023

Search Go

- This Issue
- News
 - Prepare to give your views when the Draft Local Plan Consultation launches
 - New Chief Executive recommended for Epsom & Ewell Borough Council
 - Epsom & Ewell residents need photo ID to vote at elections in May
 - Epsom & Ewell Borough Council implements a Public Space Protection Order to combat nitrous oxide use
 - Epsom & Ewell Borough Council to mark Holocaust Memorial Day
 - Cost of Living Support
 - Help your business thrive by completing our 2023 Business Survey
 - Surrey Fire and Rescue Service want to hear your views
 - Own Your Impact: Food Waste Recycling
 - Help with illness this winter
 - Jobs at Epsom & Ewell Borough Council
- What's On
- Your Council

Subscribe to receive regular updates 

Useful Links

www.epsom-ewell.gov.uk

Prepare to give your views when the Draft Local Plan Consultation launches

Comments (0)

Epsom & Ewell's Local Plan will set the vision and framework for future development in the borough. Our public consultation on the Draft Local Plan (Regulation 18) goes live on Wednesday 1 February and runs for six weeks.

It focuses on supporting businesses, creating jobs, infrastructure improvements, environmental protection and leisure development, alongside sites for new homes including affordable accommodation.


It is really important that these big decisions are informed by those who live, work, visit, shop or study in Epsom & Ewell. Responses we receive through the consultation will be critical in shaping the Local Plan and development in the borough up to 2040.

You can find out more about why it's so important we progress with our Local Plan, and how you can have your say, at <https://www.epsom-ewell.gov.uk/residents/planning/planning-policy/epsom-and-ewell-local-plan/emerging-new-local-plan>.

Once the consultation is live, you will be able to comment on the Draft Local Plan via our website. There will also be information and the opportunity to respond in local libraries. If you want to find out more about the Local Plan, there are local community events being organised and more information will be on our website.



Featured in this Issue



Get ready to have your say. The Epsom & Ewell Draft Local Plan Consultation launches on 1 February.

The Consultation on the Draft Local Plan is launching on 1 February. [Find out more here.](#)



This Issue

News

- Have your say on the Draft Local Plan Consultation
- Epsom & Ewell Borough Council OSA on the Draft Local Plan
- Meeting of Full Council renews Jackie King as Chief Executive at Epsom & Ewell Borough Council
- Could you be a community leader?
- Epsom & Ewell residents need photo ID to vote at elections in May
- 2023/24 Budget set for Epsom & Ewell Borough Council
- Jobs at Epsom & Ewell Borough Council
- Open Your Impact: Food Waste Recycling

Spotlight on

What's On

Your Community

Your Council

Subscribe to receive regular updates 

Useful Links

www.epsom-ewell.gov.uk

Follow us on:



UK Government
www.gov.uk

NHS UK
www.nhs.uk

Have your say on the Draft Local Plan Consultation

Comments (0)

We want everyone who lives, works, visits or studies in the borough to give their views on the Draft Local Plan.

The Local Plan will set the vision and framework for future development in the borough up to 2040. It focuses on a wide range of aspects designed to support the borough to grow in a strong and positive way, including supporting businesses, environmental protection, leisure development and new homes including affordable accommodation.

The consultation has been open for five weeks so far, and closes on Sunday 19 March. Those wanting to respond or find out more about the Local Plan can visit www.epsom-ewell.gov.uk/local-plan, and hard copies of the Local Plan and response forms are also available in the borough's libraries and Epsom's Town Hall. A Q&A is included in the next article to answer common questions.

Cllr Steven McCormick, Chair of the Licensing and Planning Policy Committee, said: "This consultation on the Draft Local Plan is a very early stage in an extensive process to produce a final Local Plan. What we want is for all those interested in the future of the borough to give us their feedback by responding to the consultation. All feedback will be carefully considered and the Plan will be honed and adopted before going out for a second public consultation."

"Through the public events we have run we have seen certain questions appearing and we are keen to answer these for residents, businesses and stakeholders. We hope this Q&A will be helpful and will encourage people to give us their views."

The key milestones for the Local Plan are as follows:

- February – March 2023 – Draft Local Plan public consultation (Regulation 18) - **we are at this stage**
- Consultation feedback and any further evidence gathered is reviewed, and the next version of the Local Plan is created.
- February – March 2024 – Further Public Consultation (Regulation 19)
- June 2024 – Submission to the Secretary of State
- Spring 2025 – Estimated date of Adoption

For more information and to give your views, visit the Draft Local Plan Consultation webpage on our website: epsom-ewell.gov.uk/local-plan



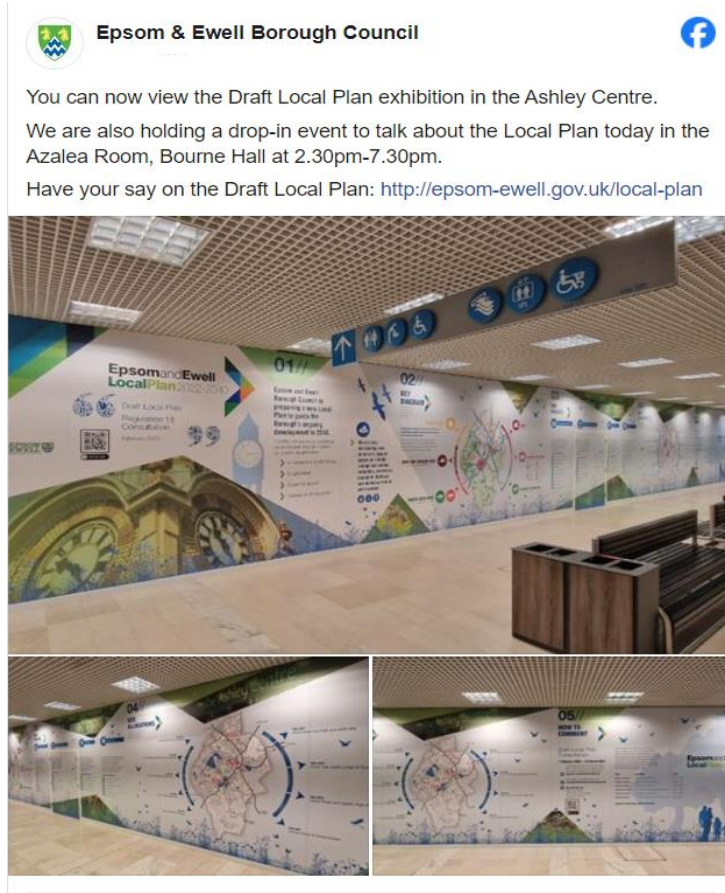
Featured in this Issue

Have your say
The Epsom & Ewell Draft Local Plan Consultation is live until 19 March.

Have your say on the Draft Local Plan. The Consultation is live until 19 March. Find out more here: epsom-ewell.gov.uk/local-plan

Social media:

Posts were released on social media platforms throughout the Regulation 18 consultation including Instagram, Facebook, Twitter, Nextdoor. A sample of the types of the social media posts released between the 1st of February and the 19th March 2023 were:



Don't forget you have 1 more week to submit your feedback for Epsom & Ewell's Draft Local Plan.

Like 2 1



We want everyone with an interest in the borough's future to give us feedback on the Draft Local Plan.

You can do that online: www.epsom-ewell.gov.uk/local-plan

You can also find hard copies of the Draft Local Plan at the Town Hall, and in Epsom and Ewell's libraries during opening hours. ... See more

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Q: Have the borough's brownfield sites been given priority consideration for housing development?

A: The Draft Local Plan takes a 'brownfield first' approach and seeks to make as much use as possible of existing suitable brownfield sites.

Extensive work has been done to find and engage with developers and land owners. A call for sites was made last year, along with research by the Council to find further suitable land. ... See more

👍 Like 💬 6 ➡ Share



Do you have questions for us about the new Draft Local Plan?

Council Officers will be available to speak to you in person on Tuesday 28 February, 10.30am - 5.30pm at the Community & Wellbeing Centre, Sefton Rd.

For a full list of events, please check here: <https://www.epsom-ewell.gov.uk/local-plan>

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Q: Have decisions already been made about what land will be developed?

A: No, the Draft Local Plan is exactly that – a draft. It has been based on a robust evidence-based approach, but we are at very early stages and a critical part of the process is to hear what all those who will be impacted by the plan think of the proposals, through this consultation.

Every response to the consultation will be read and carefully considered, and the responses will help us to amend and dev... See more

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Q: Where does the data about the borough's housing need come from?

A: The Draft Local Plan has to be developed in accordance with current national planning policy and guidance.

Current national policy requires that the starting point for determining housing need is using a government process called the Standard Methodology, which uses 2014 data from the Office of National Statistics. ... [See more](#)

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You don't have to feed back on the whole Draft Local Plan, you can pick the elements that are relevant to you and just feed back on those.

All the information on how to reply to the Draft Local Plan Consultation is on our website at www.epsom-ewell.gov.uk/local-plan, or you can pop into your local library or the Town Hall.

Over the next week we'll post the answers to some of the common questions that came up when Council officers met with people at our Draft Local Plan Consultation drop in sessions. Follow our page to see every post.

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Consultation response portal pages:

Draft Local Plan (Regulation 18) 2022-2040



Welcome to the consultation

Epsom and Ewell are preparing a new Local Plan and want you to have your say. On this page you will find links to the consultation documents and questionnaire. You can view both the desk top published version (pdf) and structured document (with questions embedded) below. In order to give us your feedback on the Plan please visit the "structured document" where you will see a series of questions related to each policy. You do not have to answer them all.

You can also open the questionnaire

Introductory video



Have questions for us?

Council Officers will be available to speak to you in person at the following places

- Monday 13 February 14:30 – 19:30 Bourne Hall, Azalea Room

separately and answer whilst viewing the desk top published version.

You will find a selection of the core evidence base documents that have informed the Local Plan at the bottom of this consultation page. The full suite of evidence base documents that have informed the Local Plan can be accessed on our [evidence base webpage](#).

For further information about the Local Plan process and planning in general please visit our Council web page.

- Thursday 16 February 12:00 – 17:00, Ashley Centre, Central Square
- Tuesday 21 February 14:30 – 19:30, Bourne Hall, Azalea room
- Wednesday 22 February 10:30 – 15:30, Community & Wellbeing Centre, Sefton Road
- Saturday 25 February 11:00 - 16:00, Ashley Centre, Central Square
- Tuesday 28 February 10:30 - 15:30, Community & Wellbeing Centre, Sefton Road

IMPORTANT UPDATE 3.3.23

Due to essential maintenance work being carried out by our third party software provider, Inovem, the Draft Local Plan consultation platform will be unavailable for a short period from 17:30 GMT on Friday 10 March. Inovem has informed us that the platform will be restored **after 12:00 GMT on Saturday 11 March. Please ensure that you save any answers to the questionnaire within the consultation platform before 17:30 on Friday 10 March.**

The Draft Local Plan, supporting documents and evidence base will still be available on our website <https://www.epsom-ewell.gov.uk/local-plan> and you can still respond by email and letter during this period.

We apologise for any inconvenience this

We apologise for any inconvenience this causes. Should you require any clarification about this disruption please contact us by emailing localplan@epsom-ewell.gov.uk or calling 01372 732000.

Consultation Ends

5 **9** **32**
days hours minutes

Consultation Material

The Draft Local Plan, Draft Policies Map and Sustainability Appraisal – interim report can be accessed under consultation documents below.

The core evidence base documents that have informed the Draft Local Plan, in addition to an FAQ document and Draft Local Plan – Made Easy Guide, can be accessed under supporting documents below.

The full suite of evidence that has informed our Draft Local Plan can be accessed on our [evidence base webpage](#).

UPDATE 3/2/23

Draft Local Plan consultation period to be extended

Epsom and Ewell Borough Council (EEBC) is extending the deadline of the Draft Local Plan Consultation to Sunday

19 March 2023. The decision has been made after a small number of inconsistencies were discovered between the version of the Draft Local Plan that can be accessed through the consultation platform and the PDF versions on EEBC's website. The extension will ensure that respondents to the consultation are not disadvantaged. EEBC have now amended the PDF versions on the website and published a schedule of the changes made to the document.

UPDATE 2/2/23

Please note the following text was omitted in error from the PDF available on the website and consultation platform on 1 and 2 February. The current version in both of these locations now includes this text:

End of Paragraph 3.1

The scale and location of growth proposed has been informed by careful consideration of the evidence and the balancing of the social, economic and environmental positive and negative effects which could arise from growth and development in the borough.

The above text is in the Draft Local Plan approved by the Licencing and Planning Policy Committee on 30 January 2023.



Opened
1 Feb 2023 at 12:00

Closes
19 Mar 2023 at 23:59

Consultation Documents



Draft Local Plan 2022-2040



Draft Local Plan 2022-2040



Draft Local Plan Reg 18 - Policies Map



Sustainability Appraisal



Sustainability Appraisal Non Technical Summary



Schedule of Changes

Supporting Documents



Local Plan Made Easy Guide



Local Plan Frequently Asked Questions



Habitats Regulations Assessment



Draft Local Plan - Viability Assessment 2022



Housing and Economic Needs Assessment (HEDNA)



Longmead and Kiln Lane Industrial Estates Economic Value Report



Gypsy and Traveller Accommodation Assessment



Land Availability Assessment 2022



Methodology for Land Availability Assessment 2022



Climate Change Study Stage 1



Green Belt Study Part 1

Respond

Respond by making comments on the consultation document

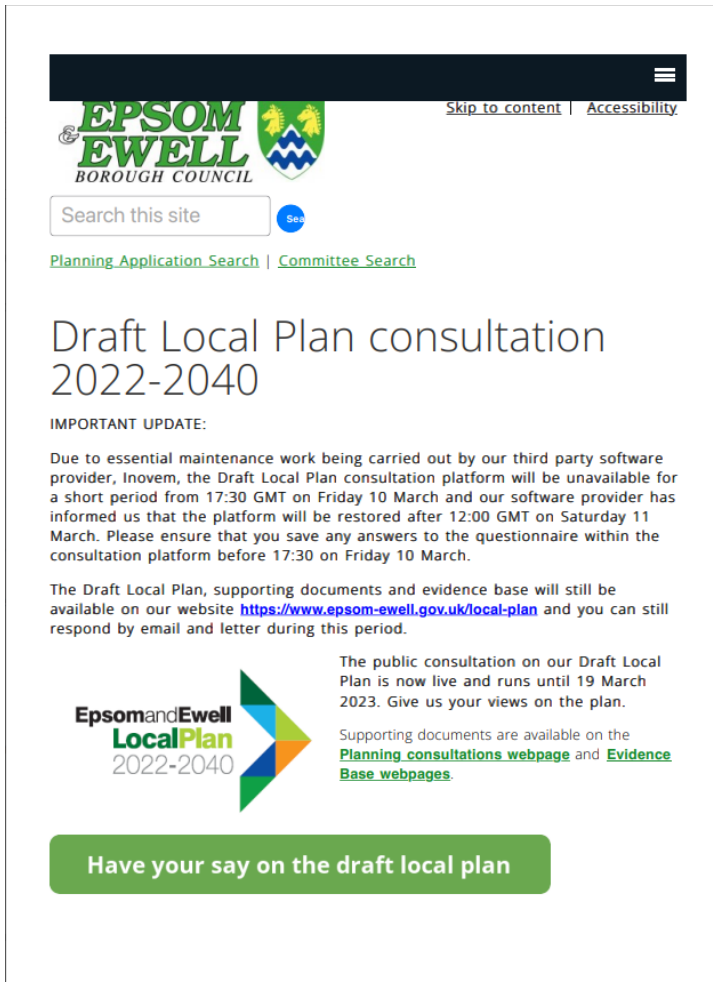
Respond by filling in the online questionnaire

Links


- [Sign up for notifications about this consultation](#)

Epsom and Ewell borough council webpages:

Planning policy webpages:



The screenshot shows the top navigation bar of the Epsom and Ewell Borough Council website. It includes the council's logo, a search bar, and links for 'Skip to content' and 'Accessibility'. Below the navigation bar, there are links for 'Planning Application Search' and 'Committee Search'. The main heading is 'Draft Local Plan consultation 2022-2040'. An 'IMPORTANT UPDATE:' section states that the consultation platform will be unavailable for a short period on Friday 10 March and Saturday 11 March. A section titled 'The Draft Local Plan, supporting documents and evidence base will still be available on our website' provides the URL <https://www.epsom-ewell.gov.uk/local-plan>. A graphic with the text 'Epsom and Ewell Local Plan 2022-2040' is shown, along with a call to action button that says 'Have your say on the draft local plan'. Text to the right of the graphic states: 'The public consultation on our Draft Local Plan is now live and runs until 19 March 2023. Give us your views on the plan. Supporting documents are available on the [Planning consultations webpage](#) and [Evidence Base webpages](#).'



The screenshot shows a video player with a red play button in the center of a black frame. Below the video player, the heading is 'A New Local Plan'. The text explains that the Council is preparing a new Local Plan to strengthen the borough's future, while also delivering new homes, jobs, improved transport and green spaces. It mentions that the new Local Plan will put in place a clear strategy to bring investment, growth and prosperity to the borough. A section titled 'The importance of an updated Local Plan' discusses recent announcements by central government and states that the Draft Local Plan is ready for public consultation. A final sentence states: 'It is vital that we address critical issues in the borough such as affordable housing. The Draft'.

Local Plan will provide a significant number of affordable homes for current residents including local families and keyworkers, and it will protect the ability of our young people to afford homes in the future. Not only that; it will help us to meet the needs of residents who are homeless or at risk of homelessness.

The Plan also focuses on supporting businesses, creating jobs, infrastructure improvements, environmental protection and leisure development, all of which are essential to allow our borough to thrive.

Green Belt

The Draft Local Plan takes a 'brownfield first' approach and seeks to make as much use as possible of existing suitable brownfield sites. However, these alone do not provide sufficient sites and therefore the Draft Plan does propose a small percentage of Green Belt release. This has not been an easy decision, but without following this course of action, we would not be doing enough to help meet the housing needs of local people now and in the future. The sites proposed lie adjacent to existing residential areas, lowering the risk of adverse impacts on the landscape, and the focus will be on empathetic design, quality builds and environmentally sustainable homes.

Shaped by you

The Draft Local Plan is our starting point. We need our residents, businesses and local stakeholders to tell us if we've got it right or not across all the topics covered by the Local Plan, and if not, how should the draft Local Plan be changed. The public consultation is critical in the development of the Local Plan and we urge you to give your views. After the consultation there will doubtless be changes and refinements needed before the next iteration of the Plan is released.

Consultation on the draft Local Plan (2022-2040) opened on the 1 February 2023 and concludes on 19 March 2023.

Have your say on the draft local plan

You can find hard copies of the Draft Local Plan at the Town

Hall, and in Epsom and Ewell's libraries during opening hours.

Epsom & Ewell Borough Council Q&A

Have decisions already been made about what land will be developed?

No, the Draft Local Plan is exactly that – a draft. It has been based on a robust evidence-based approach, but we are at very early stages and a critical part of the process is to hear what all those who will be impacted by the plan think of the proposals, through this consultation. Every response to the consultation will be read and carefully considered, and the responses will help us to amend and develop the proposals which will then go out for a

second consultation.

Is it easy to provide feedback on the Draft Local Plan?

Our consultation is open until 19 March and you can give us feedback in writing in a range of ways:

- Online: www.epsom-ewell.gov.uk/local-plan(<http://www.epsom-ewell.gov.uk/local-plan>)
- By email: localplan@epsom-ewell.gov.uk([link sends e-mail](mailto:localplan@epsom-ewell.gov.uk))
- By letter: Planning Policy, The Old Town Hall, The Parade, Epsom, KT18 5BY
- Please provide your contact details, eg name and organisation, if replying by email or letter.

You don't have to feed back on the whole Plan, you can pick the elements that are relevant to you and just feed back on those. All the information on how to reply to the consultation is on our website at www.epsom-ewell.gov.uk/local-plan(<http://www.epsom-ewell.gov.uk/local-plan>), or you can pop into your local library or the Town Hall.

Where does the data about the borough's housing need come from?

The Draft Local Plan has to be developed in accordance with current national planning policy and guidance. Current national policy requires that the starting point for determining housing need is using a government process called the Standard Methodology, which uses 2014 data from the Office of National Statistics. The Council would welcome the government implementing an updated methodology to establish housing need based upon up-to-date data as soon as possible. But at present, we need to develop the Draft Local Plan under current law and policy requirements.

Have the borough's brownfield sites been given priority consideration for housing development?

The Draft Local Plan takes a 'brownfield first' approach and seeks to make as much use as possible of existing suitable brownfield sites. Extensive work has been done to find and engage with developers and land owners. A call for sites was made last year, along with research by the Council to find further suitable land. This resulted in 163 sites identified within urban areas, each of which was carefully assessed. Ultimately, there are currently insufficient suitable urban sites to get near to our housing need number. A further call for sites is currently being made, having started when the Draft Local Plan consultation opened.

You can see our Land Availability Assessment (2022) at www.epsom-ewell.gov.uk/housing-evidence-base(<http://www.epsom-ewell.gov.uk/housing-evidence-base>).

Have Kiln Lane and the Longmead Industrial Estate been considered for housing development?

The Local Plan needs to balance housing need with economic need in the borough. Kiln Lane and Longmead Industrial Estate are home to about 130 businesses across a wide range of sectors, employing approximately 1,900 people. The Draft Local Plan proposes safeguarding this land for employment use, and intensifying it to provide additional employment floorspace,

particularly for industrial and warehouse use. There are very limited opportunities elsewhere in the borough for this type of development, or to move displaced businesses were these areas to be developed for other uses.

Some small parcels of land within these sites were put forward for development by the respective landowners, or their agents, through our initial call for sites. If further parcels of land are put forward during our current call for sites, these will also be considered.

There isn't much detail about supporting infrastructure for new housing in the plan, is this being considered?

Sufficient and appropriate infrastructure, such as schools, GP surgeries and transport links, is vital when new housing is developed. We are only at initial consultation stage, so it is currently too early to provide detailed infrastructure proposals. Through the current consultation, infrastructure providers can respond and advise us of the requirements that are needed for the current proposals. Detailed planning for the required infrastructure will take place following this consultation, to inform the next iteration of the Local Plan (Regulation 19).

Evidence base

- [Housing evidence base I](#)
- [Economic evidence base I](#)
- [Social evidence base I](#)
- [Natural environment evidence base I](#)

Statement of Community Involvement

Local development scheme

Local Development Scheme

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z

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<http://www.twitter.com/EpsomEwellBC>



Corporate webpages:

The first page was the council's homepage and the second page is the corporate consultation webpage

The screenshot shows the homepage of Epsom & Ewell Borough Council. At the top left is the council's logo. To the right is a search bar with the text "Search this site" and links for "Planning Application Search" and "Committee Search". Below the search bar is a navigation menu with links for HOME, RESIDENTS, BUSINESS, VISITORS, and COUNCIL. The main content area features a grid of service tiles: Coronavirus, Pay for it, Planning, Council Tax, Waste and recycling, Parking, Apply for it, and Report it. Below this is a "Where I live" section with a postcode input field and a "Submit" button. To the right is a "Have your say" banner for the "Draft Local Plan Consultation" which is live until 19 March. The footer contains contact information, social media icons, and a copyright notice for Epsom & Ewell Borough Council.

The screenshot shows the "Consultations" page on the council's website. It features the same header and navigation menu as the homepage. The main heading is "Consultations" with a sub-heading "Council Consultations". Below this is a paragraph explaining the council's commitment to consultation. The section "Open consultations" highlights the "Draft Local Plan 2022 - 2040 - Public Consultation". A large graphic for the "Epsom & Ewell Local Plan 2022-2040" is displayed. The text explains that the council is in the process of creating a new Local Plan and is seeking public input. It provides a link to the consultation portal: <https://epsom-ewell.inconsult.uk/>. The footer is consistent with the homepage.

Appendix B – Summary of Responses

This summary of responses provides a general high-level summary of the responses received and key issues raised for each Policy/Site Allocation/Section of the Draft Local Plan (2022-2040) Regulation 18. It sets out how the findings of the consultation have been considered in preparation of the Regulation 19.

Points to note:

Responses were submitted on behalf of landowners/site promoters. These generally are long, detailed, and technical. Key points have been picked up in the summaries where possible.

The summaries present the information that was received – for example, comments have not been amended in terms of their factual accuracy and have been summarised on this basis. Therefore, if a summary is considered not to be factually correct, it is simply that it is a summary of the comment received.

No qualification of the comments has been added. For example, a comment may be factually incorrect, but there has been no qualification or validation of that in the summaries. The text in this document does not list new site suggestions received during the Call for Sites process. This information has been included in the 2024 version of the Land Availability Assessment (LAA).

In addition, comments relating to the Appendices of the Draft Local Plan and Evidence base supporting the draft Local Plan are detailed, these comments were predominantly made under Q48 of the Consultation Questionnaire which asked, ‘Are there any other comments you wish to make about this draft Local Plan or the Sustainability Appraisal’.

In addition, we have also detailed other comments received, such as those relating to the consultation process, policies recommended for inclusion and comments on omission sites (sites not allocated in the local plan but promoted for inclusion).

In instances where comments were submitted through means other than the online questionnaire or hard copy (e.g. emails or letter) these have not been attributed to a question in the questionnaire unless it was explicitly stated which option a consultee would have chosen within the email / letter.

Not all the individual points raised are included in the summaries. The summaries identify key themes raised. The references in this table (e.g. policy numbers, sections etc) refer to the Draft Local Plan 2022-2040 that was subject to public consultation in February and March 2023. The regulation 18 Local Plan consultation with consultation responses can be viewed via the consultation portal: https://epsom-ewell.inconsult.uk/connect.ti/draftlocalplan2022_2040/consultationHome

Each of the 8 Chapters of the Local Plan and the relevant policies within it are summarised in the following tables;

Plan Policy/ Chapter	<u>Main Issues raised</u>	<u>Council Response</u>	<u>Council Action</u>
<p>Chapter 1 Introduction</p>	<p>Government bodies and statutory undertakers</p> <p>N/A</p> <p>Other organisations/ businesses/groups</p> <p><i>Stoneleigh & Auriol Neighbourhood Forum (SANF)</i> - Does not support the release of Green Belt for new homes and welcomes recognition of green spaces such as Nonsuch, Auriol Park and green adjacent to designated area.</p> <p>Individuals</p> <p>Several respondents were concerned about allocating Green Belt sites for development, pressure on infrastructure, increased population, road congestion, flooding, tall buildings and impact on the character of the borough. A number questioned the rationale behind the plan, particularly the use of the standard method for calculating housing need and outdated population projections as its basis of calculation.</p>	<p>The Introduction sets out the key aspects of Epsom and Ewell's local plan preparation. This includes context which relates to the Local Plan process, facts and information about Epsom and Ewell and what is included in the Local Plan.</p> <p>It introduces key information underpinning the preparation of the Local Plan.</p> <p>Amendments to the introduction are related to factual updates in respect of the content.</p>	<p>The introduction has been slightly updated where information has been superseded and edited to be more concise.</p>
<p>Chapter 2 Vision and Objectives</p>	<p>Government bodies and statutory undertakers</p> <p><i>The Environment Agency (EA)</i> - welcomed reference to delivering environmentally sustainable homes in para 11 but suggested setting out in more detail how this could be achieved, e.g. by adapting to and mitigating flood risk posed by climate change. It also made specific suggestions for the objectives.</p> <p><i>Historic England</i> - Welcomed references to 'conservation of its heritage' and references to Epsom and Ewell's unique character.</p> <p><i>Surrey County Council</i> - suggested that the plan does not acknowledge health and wellbeing as a core theme, and hinted how it could through the use of Health Impact Assessments. It welcomed reference made to liveable neighbourhoods and Local Transport Plan 4, but suggested the plan could do more to promote sustainable travel.</p> <p><i>Sport England</i> – agreed with objectives but wanted health opportunities to be strengthened.</p>	<p>The Vision and Objectives are intended to be high level and succinct to communicate the Council's aspirations clearly. The Plan is meant to be read as a whole and details of implementation are found in later policies.</p> <p>After review, the Council believe that the plan strikes the right balance between issues, and this is communicated well through vision and objectives (informed by the evidence base). How the plan achieves these aspirations are detailed in the policies. Therefore, it is considered no major change is required.</p>	<p>The Vision and Objectives has been amended minimally including some minor consolidation of information to support more concise wording.</p> <p>Amended relevant objective to refer to green and blue infrastructure</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p><i>Reigate and Banstead Council</i> – Suggested the plan should mention housing for ageing population as a main challenge and alignment with future 40 vision.</p> <p>Other organisations/ businesses/groups</p> <p><i>Liberal Democrats</i> - consider that greater emphasis should be made regarding enhancement of the environment and biodiversity and housing need for graduates, key workers and young adults. They consider the current wording is insufficiently detailed. Suggestions were made to improve definitions around statements including Borough's journey towards carbon neutral, defining 'environmentally sustainable homes' to bring together various strands of the vision.</p> <p><i>Green Party</i> – Concerned about the lack of consideration of the green economy, cost of biodiversity and infrastructure.</p> <p><i>CPRE Surrey</i> - Considered that the plan lacked ambition and that clearer objectives were needed, particularly in relation to wildlife and biodiversity. Considered that the vision statement of a 'very green' borough contradicted the plan proposals to build in the Green Belt. Specific recommendations were made for each objective.</p> <p><i>Crest Nicholson</i> - Considered that the evidence on housing need meant that development would be required on greenfield land/Green Belt.</p> <p><i>Rapleys (on behalf of the Jockey Club)</i> - supported the recognition of Epsom Downs Racecourse as a significant part of the Borough's unique identity and supporting a thriving equestrian sector.</p> <p><i>Stoneleigh and Auriol Neighbourhood Forum (SANF)</i> – suggested that there is little opportunity to "infill" Stoneleigh and Auriol and that there is not enough mention of infrastructure.</p> <p><i>Epsom Common Association</i> – suggested that the natural world and climate change are too peripheral to the vision.</p> <p><i>Nonsuch Residents' Association</i> – objected to development at Priest Hill / Ewell East Station.</p> <p><i>Epsom Civic Society</i> – Considers the vision vague and unconnected with policies and not clear enough about the unique character of places. They also suggested the town centre should be limited to 20mph and that active travel should be mentioned in para 9. On objectives, they suggested housing growth should not be based on 2014 projections.</p> <p><i>SCoRA</i> – recognises the needs of the borough and concerned about affordable housing but have reservations about the scale of development proposed.</p>	<p>Justification behind level of growth (e.g. on housing numbers), is based on standard method and confirmation that calculation should be made using 2014 projections, or on employment/commercial/retail needs assessments. It is important to note that the number of homes planned for is approximately 1/3 of the starting figure.</p>	

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p><i>SHoRA</i> – recognises to meet the needs of the borough but have reservations about the scale of development.</p> <p><i>Woodcote Epsom Residents Association</i> – affordable housing should be specifically recognised if it is a priority.</p> <p><i>GLF Schools</i> – would like vision to mention high quality schools.</p> <p><i>The Woodland Trust</i> – suggests nature recovery be included in the vision and objectives as an emerging statutory requirement.</p> <p><i>Ewell Village RA</i> – Supports majority of vision and objectives but that there should be an “ambitious but achievable” caveat – particularly in light of population projections on surrey website.</p> <p><i>Laine Theatre Arts</i> - Supports the vision</p> <p>Individuals</p> <p>Several respondents were concerned the plan would make the borough less attractive, develop too quickly, result in overpopulation and lack affordable housing. Some suggested a need for greater emphasis on the economy and doubted the plan’s ability to deal with related issues, such as retail provision. Some suggested the plan should be weighted more towards the environment and biodiversity, sustainable homes, health and wellbeing etc. On the other hand, some considered the plan had a contradictory rather than complementary relationship between environmental and development goals. Some considered that the scale and type of development proposed, particularly on Green Belt, is inappropriate. Some suggested the plan is too town centre focused and does not sufficiently consider other local centres. Whilst others think the town centre requires further consideration, e.g. in relation to impact of parking in the town centre. Some felt that there was not enough consideration given to specific heritage – e.g. its connection to equestrian identity, the industry for which has received notable support among responses. Many comments related to site allocations (discussed below) and raised concern about the ability of the borough’s infrastructure to cope with the scale of growth.</p>		
<p>Chapter 3</p> <p>S1</p> <p>Spatial Strategy</p>	<p>Government bodies and statutory undertakers</p> <p><i>The Environment Agency (EA)</i> - raised the issue of flood storage areas within the proposed areas of development to align with paragraph 159 of the NPPF which requires there to be ‘no increase in flood risk elsewhere’.</p> <p>Other organisations/ businesses/groups</p>	<p>The spatial strategy has been informed by a variety of evidence and follows the approach outlined in the NPPF.</p> <p>A brownfield first approach has been taken. The Land Availability Assessment (LAA) identified that approximately one third of the need calculated by the standard method could be met within the urban area. The council has since updated the LAA. This</p>	<p>The spatial strategy has been amended insofar as it no longer has an eastern component as the site at Ewell East Station is no longer available.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p><i>Woodland Trust</i> broadly support policy to focus on urban areas in order to preserve existing mature trees and protect habitats, but that high density housing should also accommodate trees along boundaries, paths and areas of public space.</p> <p><i>Green Party</i> - consider the plan hierarchy to be logical but question its meaning and that language should be more specific.</p> <p><i>Liberal Democrats</i> - raised questions about the order suggested of facts and the suggestion of challenging the standard method.</p> <p><i>Epsom Common Association</i> – consider the proposal to be a rational attempt to meet the (Housing) target though consider much of greenbelt development proposed would be damaging.</p> <p><i>Epsom Civic Society</i> – reiterate their objection to using 2014 population projection data.</p> <p><i>Girl Guides</i> – brownfield must be prioritised.</p> <p><i>GLF Schools</i> – Would like to see schools rebuilt at Glyn and Rosebery rather than housing in the Green Belt.</p> <p>Individuals</p> <p>Several respondents emphasised the spatial strategy should consider brownfield land first, many referring to the possibility of Kiln Land and Longmead Industrial Estate being allocated for housing (many using MP Chris Grayling’s Plan as an example). Many objected to the principle of developing in the Green Belt, some of which were specific in which allocations (see below) and others suggested that the level of housing growth proposed is not sustainable for reasons such as pressure on roads and other infrastructure. Some suggested alternative ways of accommodating housing need by mandating the reuse of dilapidated and second homes. Others did not support the idea of high density in the town centre. Some suggested that the key diagram did not include enough detail.</p>	<p>involved conducting another ‘call for sites’ exercise, identifying additional sites which have emerged through the development management process, contacting landowners again to confirm availability, and seeking to optimise the available sites considering their individual context. The findings were that the amount of housing which could potentially be accommodated within the urban area remains at around a third of the standard method figure.</p> <p>Consideration has been given to the redevelopment of the industrial estates, which has been suggested by many respondents. However, the Council’s economic evidence has highlighted the significant value of these areas to the local and wider economy. As such, the strategy seeks to protect and intensify these areas. The strategy also seeks to retain and reinforce the vitality and viability of Epsom Town Centre , Ewell and Stoneleigh local centres and the numerous neighbourhood parades which exist in the borough.</p> <p>The Council has engaged with its neighbouring local authorities, and those within the local housing market area, those within Surrey and authorities beyond the extend of the Green Belt to seek assistance in delivering the borough’s unmet housing need. None of the authorities who were engaged are in a position to offer assistance. Evidence of this is documented in the Council’s Statement of Compliance.</p> <p>Given the shortfall of housing the plan would deliver against the standard method, the Council has had to consider whether exceptional circumstances exist to enable a limited proportion of Green Belt to be allocated for housing. The</p>	<p>The overall number of allocated sites has increased from 9 to 35.</p> <p>The remaining trajectory comprises the windfall allowance</p> <p>The overall number of dwellings being proposed has reduced from 5,889 (57%) of need to 4,916 (48%) of need due to updated evidence (see the LAA).</p> <p>In the preamble, paragraph 17 has been added highlighting the need for consolidation rather than growth for comparison and convenience retail use in the borough.</p> <p>The hierarchy has been slightly amended to explain how each area should be developed to align better with the spatial strategy.</p> <p>It also explains why some land will be inset from the Green Belt.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
		<p>viability evidence has also shown that greenfield sites can deliver a greater proportion of affordable homes in comparison to brownfield sites, for which there is a significant need. Several development options have been considered through the sustainability appraisal process, with their impact on social, economic and environmental objectives being assessed. On balance it is considered that the release of a modest amount of Green Belt will assist in increasing the amount of housing which will be delivered over the plan period to just under 50% of the current standard method.</p> <p>Infrastructure needs have been considered through direct engagement with infrastructure providers and documented through the Infrastructure Delivery Plan (IDP). The IDP will be regularly updated.</p>	<p>An amended table SA1 shows the amended trajectory.</p> <p>Reference to meeting retail needs at Ewell East has been removed from the policy.</p> <p>Policy remains “S1”</p>
<p>Policy S2 Sustainable and Viable Development</p>	<p>Government bodies and statutory undertakers</p> <p><i>The Environment Agency (EA)</i> recommended that reference should be made to the pre-planning advice services offered by them to result in a better quality and more environmentally sustainable and sensitive development.</p> <p><i>Surrey County Council</i> suggested specific reference is made to LTP4, the transport hierarchy, and Healthy Streets, and more specific examples of change mitigation and adaptation.</p> <p>Other organisations/ businesses/groups</p> <p><i>CPRE Surrey</i> supports the text in paragraphs 3.37 to 3.41 emphasising the importance of delivering affordable housing and infrastructure.</p> <p><i>Epsom Civic Society</i> suggest wording amendments to paragraph 3 proposing circumstances where development restrictions should apply relating to local reasons. Paragraph 5 should not provide the opportunity to reduce standards but welcomed the open book requirement.</p>	<p>The policy is supportive of sustainable development to meet the needs of the borough. The policy sets out the criteria that future proposals will need to provide to justify that it is not viable to deliver policy compliant development.</p> <p>The Local Plan is intended to be read as a whole. Meetings were held with Surrey County Council to unpack comments, where it was agreed that the principles of LTP4 and Healthy Streets are reflected throughout plan without being specifically referenced.</p> <p>Whilst sustainable and viable development has implications within various policy areas in the local plan, the policy sets out the strategic focus for development in the borough. Specific aspects of</p>	<p>The viability component has been strengthened in relation to the steps applicants must follow when they present development which they state cannot meet Local Plan policy requirements due to viability.</p> <p>Policy Remains “S2”</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p><i>Green party</i> consider that the plan does not go far enough towards the climate’s ecological crisis.</p> <p><i>Sustainable Epsom and Ewell</i> welcomes the published open book requirement where viability of development is contested by the developer.</p> <p>Individuals</p> <p>Some respondents considered that the policy is to ambiguously worded. Others reiterated their concerns that the scale of growth is unsustainable due to lack of infrastructure proposed. Some respondents also reiterated their objection to building on the Green Belt. Some suggested ambiguity over what Council considers to be “viable” and the policy is too “developer focused”. Some considered that the policy Should be more prescriptive on Climate Change. Some suggested that businesses should have opportunities to have more influence over the plan.</p>	<p>development are intended to be dealt with via specific development management policies included in the Local Plan.</p>	
<p>S3 – Making efficient use of land</p>	<p>Government bodies and statutory undertakers</p> <p><i>Surrey County Council</i> recommends reference is made to LTP4 and Healthy Streets.</p> <p>Other organisations/ businesses/groups</p> <p><i>Liberal Democrats</i> concerned about criteria 3- developers should be required to meet a density target.</p> <p><i>Woodcote Residents Association</i> considered that policy S3 is far too prescriptive.</p> <p><i>SCoRA</i> – Suggests changing from maximum to minimum density targets conflicts with other policies such as design, and is too prescriptive.</p> <p><i>Epsom Civic Society</i> - would like policy to set height limits of 6/7 storeys for the town centre and ¾ storeys elsewhere.</p> <p><i>CPRE</i> – Strongly support policy s3 and paragraphs 3.42 and 3.49 and propose measures to ensure rational areas can be comprehensively redeveloped</p> <p><i>Green Party</i> – comments do not support homes on Horton Farm</p> <p><i>Liberal Democrats</i> – comments don’t support all site allocations and policy wording around density standards.</p> <p>Individuals</p>	<p>The Local Plan supports making efficient use of land for development within the borough.</p> <p>Design is an important way to incorporate the principles of efficient use of land which should be considered as part of the development process. As such, densities have been included with the Design policy (S11) to support design considerations for major development.</p>	<p>The policy S3 (Making efficient use of land) has been integrated into the design policy S11.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p>Several commentators stated requirements are either; too prescriptive/ too high / too low/ too ambiguous. Some also noted that the policy was silent on the height of buildings. Others recognised that efficient use of land would help maximise brownfield sites. Some comments referred to the term "efficient" not being clearly defined in the policy but that there was an implicit presumption towards development in its use.</p>		
<p>S4 Development in the Green Belt</p>	<p>Government bodies and statutory undertakers</p> <p><i>Elmbridge Borough Council (EBC)</i> are concerned as to the potential misinterpretation of purpose 4 ('Preserve the setting and special character of historic towns') in the Green Belt evidence, which 22 parcels of Green Belt land have been identified as either performing highly, moderately or lower against. In line with PAS Guidance, the Elmbridge Green Belt Boundary Review (GBBR) has not applied purpose 4. It is generally felt that this criteria will only apply to very few settlements in practice due largely to the pattern of modern development that often envelopes historic towns today.</p> <p>Other organisations/ businesses/groups</p> <p><i>Stoneleigh & Auriel Neighbourhood Forum (SANF)</i>: does not support the release of green belt for new homes.</p> <p><i>Woodcote Epsom Residents' Society (WERS)</i> supports the policy though opposes the loss of 3 existing 'high performing' Green Belt sites.</p> <p><i>CPRE Surrey</i> considers the housing target of 300 dwellings per annum is unjustifiably high and should accommodate future housing within the Kiln Lane and Longmead 'industrial' areas. It suggests the Council has disregarded evidence from its own Green Belt studies due to the inclusion of high scoring Green Belt sites.</p> <p><i>NESCOT</i> consider that redevelopment and expansion at NESCOT is essential.</p> <p><i>Savills</i> consider that the LPA should release more Green Belt land in order to meet the housing needs. They cite the Duty to Cooperate document (2023) which illustrates the unmet housing needs in Epsom & Ewell and nearby LPAs. They also cite an example of a Local Plans that has been found 'unsound' at Examination and which the Inspector states require more Green Belt release in order to meet housing needs.</p> <p><i>Epsom Common Association</i> – are concerned that criteria for Green Belt does not include nature conservation and biodiversity.</p> <p><i>Epsom Civic Society</i> – oppose development in the Green Belt.</p> <p><i>Sustainable Epsom and Ewell</i> – opposed site allocations in the Green Belt.</p>	<p>It is considered that whilst the sentiment of responses against Green Belt release is understood, the questions about this policy were about the criteria for when development in the Green Belt should be considered (which is generally reflective of national policy).</p> <p>It is, however, recognised, that as originally drafted, the policy could have been more clearly worded to reflect national policy.</p> <p>References to site allocations in the Green Belt and the Local Plan evidence base on Green Belt are covered within the spatial strategy, individual site allocations and the evidence base.</p>	<p>Policy S4 Development in the Green Belt has changed to DM15 Green Belt</p> <p>Wording has been consolidated to support more concise wording dealing with proposals within the greenbelt which aligns with National planning Policy.</p> <p>Further investigation into the meaning of criteria 4 has been sought. For the purposes of an updated Green Belt Paper, this criteria is no longer used.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p><i>Montreaux</i> - Suggests level of Green Belt release is insufficient to meet housing need.</p> <p><i>Lichfields</i> – agree that exceptional circumstances exist to release Green Belt. They further suggest that the Council has not demonstrated strong reasons why the site promoted at Downs Farm should not be released from the Green Belt.</p> <p><i>Carter Jonas</i> believes the policy is unclear, does not accord with national policy and suggests Land off Cuddington Glade should be released from the Green Belt.</p> <p><i>Epsom Green Belt Group</i> – Submitted a petition objecting to the release of Green Belt.</p> <p>Individual comments</p> <p>Several respondents expressed the view that too much Green Belt Land was being released, though some suggested not enough. Many re-stated their objections to sites proposed to be allocated in the Green Belt. Some shared concern with methodology of Green Belt Assessments (e.g. application of historic towns). Some expressed concerns with chronology of Green Belt study (i.e. part 2 being completed after publication of draft plan) and others had concerns over Green Belt definition and interpretation of national policy (e.g. “infill”).</p>		
<p>S5 Climate Change and mitigation</p>	<p>Government bodies and statutory undertakers</p> <p><i>The Environment Agency (EA)</i> recommend that the policy should be further strengthened to include reference to the necessity of managing flood risk for the lifetime of any new developments. They were pleased to see the importance of biodiversity in tackling the climate crisis being acknowledged. Further policy wording included: ‘increasing the potential for blue-green infrastructure and habitats through biodiversity net gain and prioritisation of nature-based solutions’.</p> <p><i>Surrey County Council (SCC)</i> supported the commitment to ‘direct development to locations that will minimise the need to travel and maximise the use of sustainable modes of transport including cycling, walking and public transport, promoting a modal shift away from private car use’ and recognised alignment with the ambitions of LTP4 and the Plan’s Sustainable Travel Hierarchy. They suggested that reference is made to the requirement for the provision of waste management plans to be submitted as part of suitable planning applications. Further comments were made relating to all buildings being designed to be operationally net zero carbon but that the policies set out do not have clear targets or standards. There was also a need for a carbon offset fund to be developed and delivered as per section 106 agreements.</p> <p><i>Reigate and Banstead Borough Council</i> support the climate change and mitigation strategy and would be willing to work with on a combined approach.</p> <p>Other organisations/ businesses/groups</p>	<p>The policy provides a strategic focus that is complemented by a series of Development Management Policies within the Local Plan.</p> <p>The policy as written provides the appropriate balance of demonstrating how through development climate change and adaptation can be delivered without impacting the delivery of development.</p>	<p>Policy S5 Climate Change mitigation and adaptation has changed to S3 Climate Change and Mitigation</p> <p>Liaison with SCC has been ongoing where SCC have been developing further guidance on climate change which would cover countywide considerations.</p>

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	<p><i>Epsom Civic Society</i> commented that Policy S5 should provide more details and prescriptive requirements.</p> <p><i>The Woodland Trust</i> recommended setting a tree canopy cover target.</p> <p><i>CPRE Surrey</i> – would like the Council to be more proactive on the issue and suggest a mandatory requirement that all commercial buildings should have solar panels.</p> <p><i>Liberal Democrats</i> – suggests policy should include specific requirements regarding renewable energy sources and allotments.</p> <p><i>Epsom Common Association</i> – states that we need to reduce emissions more quickly than the policy suggests.</p> <p><i>Sustainable Epsom and Ewell</i> – suggests that this policy should be prioritised over others; that it should be prescriptive in requiring a proportion of renewable energy per development and should include more information on the role of green infrastructure.</p> <p>Individuals</p> <p>Respondents had mixed views about whether the policy was too strong (for viability reasons) or not strong enough (e.g. should be aiming for zero carbon rather than low carbon home, requiring a more stringent limit on water usage (110lp/d), mandatory percentage of renewable per development, the IEMA management hierarchy, SBTi processes). Others pointed to the need to emphasise rainwater collection as a measure in the policy. Some emphasised the connection between biodiversity and this policy. Some respondents pointed to ambiguity on definitions (e.g. net zero). Some suggested the policy should apply to refurbishment as well as new build. Some suggested that this policy was undermined by others in the plan, such as site allocations or by the general growth orientated nature of the plan. Others reiterated their objection to certain site allocations.</p>		
<p>SA1 Hook Road Car Park and SGN Site</p>	<p>Government bodies and statutory undertakers</p> <p><i>Surrey County Council</i> - LTP4 promotes a policy of demand management for cars, and thus does not view the loss of car parking as a site constraint.</p> <p><i>Historic England</i> - The policy should require a Heritage Impact Assessment as part of any proposals for the site that identifies the significance of the heritage assets affected by the development, the harm that may</p>	<p>Comments from SCC are noted.</p> <p>In response to Historic England a Heritage Impact Assessment has been prepared and within the site</p>	<p>Heritage Impact Assessments produced and a Heritage Topic Paper will be prepared to support the Regulation 19 consultation</p> <p>Site allocation wording updated to identify SPZ a</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p>arise from the proposals, and any avoidance or mitigation, including enhancement of the significance of the heritage assets, that may be appropriate.</p> <p><i>Environment Agency</i> - The site is located upon a Source Protection Zones (SPZ) and/or have other groundwater protection designations.</p> <p><i>Thames Water</i> - A high level review of the potential impacts has been undertaken. The scale of development/s in this catchment is likely to require upgrades of the water supply and wastewater network infrastructure. Recommended that the developer and local authority liaise with Thames Water early in the process to agree a housing phasing plan to ensure necessary infrastructure upgrades are delivered ahead of the occupation of development.</p> <p>Other organisations/ businesses/groups</p> <p><i>Epsom Civic Society</i> – net zero should be required for all new dwellings, demolition of Car Park should be synchronised with re-provision. Height Policy needed (6/7 storeys max in TC).</p> <p><i>Ewell Village RA</i> – buildings should be limited to 6 storeys.</p> <p><i>SANF</i> – Infill development needs to be in keeping with character of area</p> <p><i>Liberal Democrats</i> – Parking provision not clear, public car parking should be maximised.</p> <p><i>Town and Country Homes</i> – Rate of build out likely lower than planned for.</p> <p><i>SCORA</i> – Supports regeneration of area though reservations about viability.</p> <p><i>Laines Theatre Arts Centre</i>: believes this site to be an ideal location for Laine to thrive. It is in close proximity to their current campus and believe this will support the town’s hope for a new urbanised community arts space. The allowance for the number of student bedrooms they believe is too low given the student population in the borough and the shortage of suitable purpose-built student accommodation. Would like the ability to hold community events, showcases and performances for the community.</p> <p><i>Big Yellow Storage</i> - It is Big Yellow’s aspiration to redevelop 31-37 East Street to construct a new self-storage facility (Class B8) with flexible office space (Class E(g)(i)), and a full application is currently pending</p>	<p>allocation makes reference to the consideration of local heritage assets.</p> <p>EAs comments are noted and acknowledged in the land availability assessment. Policy wording to be updated to identify the SPZ.</p> <p>In relation to the Laines’ comments about insufficient student housing proposed, there is opportunity to deliver additional student accommodation in Epsom Town centre or other highly accessible locations to meet development needs.</p> <p>The planning consent for the big yellow storage facility received planning consent (on appeal) and the development has now commenced and this part of the site is not be included as a site allocation in the Regulation 19 version of the Local Plan.</p>	<p>consideration as part of a planning application.</p> <p>The site allocation has been split into to smaller site allocation (SGN and Hook Road Car Park).</p> <p>As permission has been granted and construction commenced 31-37 East Street is not allocated in the Reg 19 Local Plan.</p> <p>The site allocation has been split into to smaller site allocation (</p> <p>SA1 (southern Gas Network Site)</p> <p>SA2 (Hook Road Car Park)</p> <p>SA3 (Solis House, 20 Hook Road)</p> <p>SA4 (Bunzl, Hook Road)</p> <p>The allocation for the SGN site aligns with the planning application that is awaiting determination.</p>

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	<p>determination (E&E Ref: 22/01518/FUL) by Epsom and Ewell Council. These aspirations have been outlined in detail to the Council's Planning officers over the past 15 months.</p> <p><i>Southern Gas Network (SGN)</i>- The land uses and overall quantum of development proposed would require minimal parking for residents and users and would be wholly in accordance with national and local policy; consequently, the impact on the highway network would be minimal, meaning limited mitigation will be required. The adjacent MSCP site (Hook Rod Car Park) as a future redevelopment phase that is unfettered by the emerging development proposals for the SGN site, Indeed, the need for the MSCP in a town centre location is reducing and the car park is currently underutilised, which may inform future development appraisals of the adjacent site.</p> <p><i>The Woodland Trust</i> recommend setting a tree canopy cover target for the site, noting that an increase in canopy cover will only be achieved if existing trees are maintained.</p> <p>Individuals</p> <p>Several respondents supported the allocation in general, being brownfield site. Various prescriptive requirements suggested (e.g. Net Zero carbon requirement for all development). Some suggest a specific height policy needed (7 storeys too high) whilst some suggested there is insufficient detail provided to understand how the proposed 2-7 storey buildings would be arranged and whether these achieve the optimal site efficiency. Others pointed out that the density does not align with proposed policy S3. Others suggested density should be maximised commensurate with the location of these sites within the town centre. Some respondents expressed concerns about viability, others over loss of parking and traffic generated from site. Some pointed that the Car Parks were used at weekends for users of the nearby leisure facilities and Laine Theatre arts and that any demotion of the Hook Road car park would need to be synchronised with the new car parking provision in Depot Road. Some pointed out that large strategic sites tend to be delivered at a far slower rate than anticipated in the Local Plan, therefore the supply of homes is likely to be below what is planned for. Some suggested that the level of affordable homes and flats required too high / too low. A number pointed to the lack of Infrastructure to support or concerns about impact of development on the borough's infrastructure including highways, rail services, schools and health. Some suggested that there is plenty of empty office space already near town centre and questioned why more was needed. Some encourage and support any expansion of the ability to cross the railway which can be facilitated through this development. Some had concerns over traffic impacts. Some suggested that development should be removed due to traffic impacts.</p>	<p>To reflect different land ownerships the wider site allocation as set out in the draft Local Plan has been split, with the SGN site forming its own allocation.</p> <p>The Neighbouring Hook Road Car Park has its own allocation.</p> <p>We note the comments on reduced parking provision and note that there is live planning application (awaiting determination) for the SGN site.</p> <p>The Local Plan viability study (2022) identified that net zero on urban sites was unlikely to be viable. However, more recent evidence indicates that all new residential development in the borough can meet higher sustainability standards (Policy S3 Climate Change and DM10 (Building Emissions Standards)).</p> <p>With regards to comments about building heights The Epsom Town Centre Masterplan identifies potential development options for the site and identifies that taller developments would need to be justified by townscape and heritage analysis.</p> <p>In accordance with the NPPF the council needs to demonstrate efficient use of land.</p>	

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		<p>The viability of the site will be impacted by the costs of contamination remediation and therefore higher density scheme is likely to be required to meet policy requirements.</p> <p>Parking surveys were undertaken as part of the town centre masterplan which indicate that the car park is under utilised and there is sufficient capacity within other town centre car parks. It is proposed to increase car parking capacity by decking other surface level car parks in the town centre in advance of the site being redeveloped.</p> <p>There is a live planning application for the SGN part of the site (awaiting determination) and the council has produced a detailed phasing trajectory as part of the Local Plan.</p> <p>Affordable housing requirements will need to be in accordance with the Local Plan policy requirements unless it can be demonstrated that this would not be viable.</p> <p>The Council has worked with infrastructure providers to understand needs arising from the Local Plan. We have published a Transport Assessment and Infrastructure Delivery Plan.</p> <p>No commercial (office) floorspace is proposed as part of the allocation.</p>	

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		<p>We recognise the value that urban trees and planting can contribute in development schemes.</p> <p>Any future planning application for the site(s) will be supported by a Transport Assessment.</p>	
<p>SA2 Town Hall, Hope Lodge & Epsom Clinic</p>	<p>Government bodies and statutory undertakers</p> <p><i>Environment Agency</i> - Site is in a Source Protection Zone (SPZ1).</p> <p><i>Historic England</i> - Site is adjacent to the Church Street and Epsom Town Centre conservation areas and a number of listed buildings, and is partly within an area of high archaeological potential. Policy should require a Heritage Impact Assessment as part of any proposals for the site.</p> <p><i>Thames Water</i> - A high level review of the potential impacts has been undertaken. On the information available to date, we do not envisage infrastructure concerns regarding water supply/wastewater network infrastructure in relation to this development/s.</p> <p><i>NHS Property Services</i> - Support this allocation. As part of a planned service reprovision, the services currently on the site are planned be relocated to more modern fit for purpose accommodation within the borough. The site will then be declared surplus to the operational healthcare requirements of the NHS by local healthcare commissioners. The site could achieve 13 dwellings (at 80 dwellings per hectare), although final capacities will be subject to detailed design work.</p> <p>Other organisations/ businesses/groups</p>	<p>EAs comments are noted and acknowledged in the land availability assessment. Policy wording to be updated to identify the SPZ.</p> <p>A Heritage Impact Assessment has been prepared and within the site allocation makes reference to the consideration of local heritage assets.</p> <p>Higher densities / different redevelopment options for the sites have been considered through the Epsom Town Centre Masterplan</p> <p>A higher density option for the site has been considered through the Town Centre Masterplan to reflect the planning consent for a care home on the adjoining former police and ambulance station site.</p>	<p>Allocation split into 4 sites (SA5, Epsom Town Hall, SA6 Hope Lodge Car Park, SA7 Former Police and Ambulance Stations Sites and SA8 Epsom Clinic) to reflect different ownerships and sites coming forward at different times. This approach is aligned with the Epsom Town Centre Masterplan.</p> <p>Densities increased following additional work through the Epsom Town Centre Masterplan.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p><i>Epsom Civic Society</i> – Should be net zero requirement for all dwellings as well as height policy (6/7 storeys for town centre). Site can accommodate more than 90 homes.</p> <p><i>Sustainable Epsom and Ewell</i> – Does not meet proposed policy S3. Not clear what type of homes are proposed, should be limited to 2-4 storeys and net zero.</p> <p><i>Stoneleigh and Auriol Neighbourhood Forum</i> – Infil should be in keeping with the character of the area.</p> <p><i>Ewell Village RA</i> – Heights should be limited to 5/6 storeys in Epsom Town Centre. Town Hall façade should be preserved.</p> <p><i>Woodcote Residents Association</i> – Concerned about level of re-provided parking</p> <p>The Woodland Trust – Protected trees are close by the site and should be protected. Policy should set a tree canopy target for site.</p> <p>Liberal Democrats – Clarification on kind of parking needed.</p> <p>SCORA – Not accurately described. Concerned about level of re-provided parking.</p> <p>Individuals</p> <p>Support in general being brownfield site. Site specific issues such as historic buildings and protected trees drawn attention to. Specific height policy needed. Density does not align with policy S3. Concern over loss of parking / traffic generated from site. Level of affordable homes and flats required too high / too low. Lack of Infrastructure to support.</p>	<p>The updated site allocations for the sites will identify considerations such as historic environment.</p> <p>The Town Centre Masterplan provides guidelines for potential development heights and revised densities for the sites which will broadly be in line with the minimum density requirements.</p> <p>The level of affordable housing will need to be in conformity with the Local Plan requirements. On previously developed sites the requirement is 30% affordable housing from major schemes.</p> <p>The Council has worked with infrastructure providers to understand needs arising from the Local Plan. We have published a Transport Assessment and Infrastructure Delivery Plan.</p>	
<p>SA3 Depot Road and Upper High Street</p>	<p>Government bodies and statutory undertakers</p> <p><i>Environment Agency</i> - Site is in a Source Protection Zone (SPZ1).</p> <p><i>Historic England</i> - Site is adjacent to the Church Street and Pikes Hill conservation areas and a number of listed buildings. Policy should require a Heritage Impact Assessment as part of any proposals for the site.</p>	<p>EA's comments are noted and acknowledged in the land availability assessment. Policy wording to be updated to identify the SPZ.</p> <p>A Heritage Impact Assessment has been prepared and within the site allocation makes reference to the consideration of local heritage assets.</p>	<p>Policy reference changed to Policy SA9 (Depot Road and Upper High Street) and updated to contain more detail on issues that will need to be considered at the planning application stage.</p>

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	<p><i>Thames Water</i> - A high level review of the potential impacts has been undertaken. On the information available to date, we do not envisage infrastructure concerns regarding water supply/wastewater network infrastructure in relation to this development/s.</p> <p><i>Surrey County Council</i> - LTP4 does not support the building of new car parking facilities and does support a reduction in car parking. The guidance also states that it is essential to strike a balance on providing an appropriate level and type of parking, protecting highway safety and promoting transport sustainability. SCC is concerned about providing for car parking demand in areas already heavily congested and are near to public transport facilities. Recommend parking facilities are provided alongside secure cycle parking for both standard and non standard cycles.</p> <p>Other organisations/ businesses/groups</p> <p>The Woodland Trust recommend an exercise to complete the Ancient Tree Inventory (ATI) across the site and setting a tree canopy cover target for the site, noting that an increase can only be achieved if existing trees are maintained.</p> <p><i>Epsom Civic Society</i> – Should be net zero requirement for all dwellings as well as height policy (6/7 storeys for town centre). Parking needs to be synchronised with Hook Road plans.</p> <p><i>Sustainable Epsom and Ewell</i> – Not clear what type of homes proposed, buildings should be limited to 2-4 storeys and questions why not net zero.</p> <p><i>Ewell Village RA</i> – Heights should be limited to 6 storeys.</p> <p>CPRE Surrey – considers whether other sites for parking (such as on Kiln Lane) have been considered.</p> <p><i>Stoneleigh and Auriol Neighbourhood Forum</i> – Infil should be in keeping with the character of the area.</p> <p>Liberal Democrats – Clarification on kind of parking needed.</p> <p>SCoRA – Pedestrian connectivity with town centre should be upgraded.</p> <p>Individuals</p> <p>Specific height policy needed. Varying views on density and height expressed, with some feeling the allocation proposes were too dense or high and others considering the density could be increased along with building heights. Mixed views on the type of housing that should be provided on the site, with some respondents</p>	<p>We consider that LTP4 has been interpreted too literally on comments for town centre sites, with no regard to context or the economic importance of providing parking to support the town centre.</p> <p>Justification for parking is based on parking strategy and to offset demand created by the re-use of car parks elsewhere in the town centres.</p> <p>demolishing elsewhere.</p> <p>EEBC are committed to sustainability and aspirations of LTP4 are reflected throughout the Local Plan. It is therefore considered that no amendments are needed re: parking proposal.</p> <p>All other issues considered and original evidence (e.g. viability assessment, site promoter info, masterplan work) deferred to. For allocation purposes, no amendments to this policy are considered necessary.</p> <p>The Allocation has been informed by the Town Centre Masterplan which identifies that the site could accommodate approximately 100 homes (mix of apartments of houses) and a decked car public car park. The policy is not prescriptive on the exact mix, this will need to have regard to the housing mix policy in the local plan and development viability.</p>	

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p>considering that there are too many flats in the town centre and more focus should be on family homes, with others considering that the site would be better suited to apartments. Concerns about lack of affordable homes. Lack of Infrastructure to support. Concerns about the loss of public car parking, impacts upon the highway network.</p>	<p>Any planning application submitted will be expected to deliver affordable housing in accordance with the Local Plan policies.</p> <p>The Council has worked with infrastructure providers to understand needs arising from the Local Plan. We have published a Transport Assessment and Infrastructure Delivery Plan.</p> <p>The allocation includes for the provision of a multi-storey car park which will retain public car parking provision on the site to serve the town centre, whilst freeing up part of the site to deliver residential development.</p> <p>Any future planning application will need to be supported by a transport assessment and travel plan.</p> <p>The Local Plan contains a Policy on Trees, Woodlands and Hedgerows (Policy DM17) in addition to a policy on Biodiversity Net Gain (Policy S14) which will be considerations in the redevelopment of the site.</p>	

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<p>SA4 Ashley Centre and Global House</p>	<p>Government bodies and statutory undertakers</p> <p><i>Environment Agency</i> - The site is located in Source Protection Zone (SPZ1)</p> <p><i>Historic England</i> - The site is adjacent to Epsom Town Centre conservation area and a number of listed buildings and is within an area of high archaeological potential. The policy should require a Heritage Impact Assessment as part of any proposals for the site.</p> <p><i>Transport for London</i> - There is an existing offside bus stand for 5 buses in a segregated slip road on Ashley Avenue outside the Ashley Centre which will need to be retained as part of any redevelopment</p> <p><i>Surrey County Council</i>- LTP4 promotes a policy of demand management for cars and thus does not view the loss of car parking as a site constraint.</p> <p><i>Thames Water</i> - from the information available to date we do not envisage infrastructure concerns regarding water supply /waste water network infrastructure in relation to this development/s.</p> <p>Other organisations/ businesses/groups</p> <p><i>Land Owner</i> - In summary, the Ashley Centre SARL are very supportive of the inclusion of the allocation, although suggest that the allocation cannot overly limit future development coming forward on the site. Acknowledge the need for the modernisation of the Ashley Centre, which was designed and built 40 years ago. Consider there is potential to redevelop global house (approx 5,000sm office) to accommodate residential development upto 15 stories. Have considered other options including the demolition of the car park, Waitrose store and Playhouse to deliver a more comprehensive scheme. Consider it is not appropriate for an allocation to mandate the retention of the Ashley Centre. Allocations are meant to facilitate forms of development that require planning permission.</p>	<p>EA comments are acknowledged and issue in the land availability assessment. Policy wording to be updated to identify the SPZ.</p> <p>A Heritage Impact Assessment has been prepared and within the site allocation makes reference to the consideration of local heritage assets.</p> <p>The site allocation has been amended to refer to Global House only. The segregated slip road is located outside of the site boundary.</p> <p>The site allocation has been amended to refer to Global House only. There are no plans to redevelop the car park at the Ashley Centre.</p> <p>The policy has been revised to only allocate Global House for residential development.</p> <p>This is because the car park and Playhouse Theatre are in the council's ownership and are not available for redevelopment.</p> <p>A new Epsom Town Centre Policy (Policy S4) has been introduced into the Regulation 19 Local Plan to reflect the aspirations of the town centre masterplan.</p>	<p>Policy Amended to only cover Global House and policy reference changed to Policy SA12 and updated to contain more detail on issues that will need to be considered at the planning application stage.</p> <p>New strategic allocation on Epsom Town Centre included in the Local Plan which encourages diversification of the town centre offer and will apply to the Ashley Centre.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p><i>Epsom Civic Society</i> – Should be net zero requirement and has reservations about 8 storeys. Suggests height policy (6/7 storeys for town centre). Refurbishment should be prioritised. Site can accommodate more than 90 homes.</p> <p><i>Stoneleigh and Auriol Neighbourhood Forum</i> – Infil should be in keeping with the character of the area.</p> <p><i>Woodland Trust</i> – No objection to the allocation, suggests updating the Ancient Tree Inventory and setting a tree canopy cover target for site.</p> <p><i>Sustainable Epsom and Ewell</i> – Does not meet proposed policy S3. Not clear whether will be demolished or refurbished.</p> <p><i>Ewell Village RA</i> – Heights should be limited to 6 storeys.</p> <p>Liberal Democrats – Clarification on kind of parking needed.</p> <p>SCORA – Support Allocation.</p> <p>Individuals</p> <p>Support the development of this brownfield site. These offices should be retained and used to encourage and support local business and economy. The retention re-use and adaptation of existing building stock should be the starting point as a means of achieving sustainable development. Where development is being carried out, the existing building fabric and materials should be re-used where possible. Suggestions for a wide range of uses other than housing (community use) and the need to retain existing and attract new stores to the Ashley Centre. Specific height policy needed, concern about heights of up to 8 stories. Concerns about highways impacts and that the gyratory area is dangerous for cyclists.</p> <p>Consider including a dedicated area for cycle parking in the Ashley Centre Car Park. Concerns about loss of parking at the site and its economic implications. Concerns about the loss of the Playhouse. Concerns about lack of infrastructure.</p> <p>Consideration that the site should deliver at least 50% affordable housing. Concerns about infrastructure provision</p>	<p>There is a modest demand for office floorspace in the borough over the Local Plan period and we consider that vacant floorspace will make a contribution to this supply. However, the site owner states that demand for floorspace at the site is low and therefore redevelopment / conversion of housing is considered appropriate.</p> <p>Policy on Epsom Town Centre and policies in relation to the primary shopping areas and retail frontages will encourage enable greater diversification of the town centre, whilst protecting the retail core.</p> <p>The Epsom Town Centre masterplan has informed the allocation. The Masterplan was informed by a townscape and heritage assessment which concluded the upto 8 stories would be acceptable in this location.</p> <p>Any future planning application will need to be supported by a transport assessment and travel plan.</p> <p>The allocation has been amended so that is relates to Global House only. There are no plans to redevelop the car park.</p> <p>The allocation has been amended so that is relates to Global House only. There are no plans to redevelop the Playhouse.</p>	

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
		<p>The Council has worked with infrastructure providers to understand needs arising from the Local Plan. We have published a Transport Assessment and Infrastructure Delivery Plan</p> <p>The Councils Local plan viability assessment indicates that on sites such as this, 30% affordable housing can be achieved without impacting development viability.</p> <p>The Council has worked with infrastructure providers to understand needs arising from the Local Plan. We have published a Transport Assessment and Infrastructure Delivery Plan.</p>	
<p>SA5: Land at West Park Hospital</p>	<p>Government bodies and statutory undertakers</p> <p><i>Thames Water</i> - The scale of development/s in this catchment is likely to require upgrades of the water supply and wastewater network infrastructure.</p> <p><i>Environment Agency</i> - Site is in a Source Protection Zone (SPZ1).</p> <p><i>Historic England</i> - Site is adjacent and partly within West Park conservation area. Policy should require a Heritage Impact Assessment as part of any proposals for the site.</p>	<p>SPZ designation added to allocation criteria.</p> <p>A Heritage Impact Assessment has been prepared and within the site allocation makes reference to the consideration of local heritage assets.</p> <p>A strategic transport assessment has been prepared for the Local Plan and the findings of this work have been shared with RBK following Duty to Cooperate discussions.</p>	<p>Policy reference changed to Policy SA32, and updated to contain more detail on issues that will need to be considered at the planning application stage.</p> <p>SA5 has been split into 2 sites- SA31 and SA32 for the Regulation 19.</p>

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	<p><i>Royal Borough of Kingston Upon Thames</i> - Concerned that the sites (and other green belt allocations) will add pressure to the local road network, including the key stress points of Tolworth and Hook junctions of the A3.</p> <p>Other organisations/ businesses/groups</p> <p><i>Ewell Village RA</i> – Heights should be limited to 6 storeys.</p> <p><i>Town and Country Housing</i> – Objects to self/custom building being required as not funded by Homes England and can therefore hinder affordable housing delivery.</p> <p><i>Liberal Democrats</i> – Considers allocation a “missed opportunity” and can be higher density and notes the allocation has the endorsement of the NHS.</p> <p><i>Epsom Civic Society</i> – no objection due to land being previously developed land, on condition of development being tasteful. Suggests a height policy be introduced (3/4 storeys), and specify Green Infrastructure.</p> <p><i>SCORA</i> – Supports allocation as PDL and questions why E&E Cottage Hospital is excluded as understands it is also being relocated. Essential that infrastructure is supported.</p> <p><i>Stamford & Horton Residents Association (SWRA)</i> – support allocation being PDL, also question why Cottage Hospital is excluded, that infrastructure is needed and suggest public adoption of private roads.</p> <p><i>Epsom Common Association</i> – sensitive redevelopment reasonable. Green Infrastructure should be maintained. Impact on Epsom Common must be assessed.</p> <p><i>Green Party (Mole Valley & Epsom and Ewell)</i> – Site should remain in the Green Belt.</p>	<p>Policy will be amended to split the site into two distinct areas and include the New Epsom & Ewell Community Hospital.</p> <p>Reference to self and custom build removed from the policy criteria, however a self and custom build policy has been included in the plan (Policy DM2). The policy provides flexibility where there is limited demand for plots.</p> <p>The allocation(s) will effectively inset the site(s) from the Green Belt.</p> <p>The allocation for the Northern land parcel has been amended to include the New Epsom & Ewell Community Hospital.</p> <p>The allocation for the Northern land parcel has been amended to include the New Epsom & Ewell Community Hospital.</p> <p>These areas do not form part of the site allocation(s).</p> <p>Noted – criteria to policy?</p>	

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	<p><i>Woodland Trust</i> - recommend an exercise to complete the Ancient Tree Inventory (ATI) across the site and setting a tree canopy cover target for the site, noting that an increase can only be achieved if existing trees are maintained.</p> <p><i>Surrey Wildlife Trust</i> – Protect Horton Country Park from direct and indirect impacts from development.</p> <p><i>Sustainable Epsom and Ewell</i> – Inconsistent terminology – homes are dwellings? No mention of green infrastructure in Green Corridor description.</p> <p><i>Stoneleigh and Auriol Neighbourhood Forum</i> – Infil should be in keeping with the character of the area. Impact on biodiversity should be considered.</p> <p><i>British Horse Society</i> – Draws attention to bridleways bordering the site and must not be impacted. Sustainable transport should include provision for equestrians.</p> <p><i>Agent representing the landowner</i> considers the site is capable of accommodating around 200 dwellings. Development is likely to comprise mostly flats of low rise mansion block style at around 30 dwellings per hectare. Do not consider self/custom build appropriate, which is generally suited to lower density sites. The operational requirements of the West Park Hospital are still emerging and any development will need to accommodate needs. The flexibility of the policy is therefore welcomed. Timescale of development is supported.</p> <p><i>NHS Property Services Ltd.</i> - Consider that the site should be removed from the Green Belt as it does not perform against those purposes set out in national planning policy and the site was identified as performing poorly in the Council's 2017 Green Belt study. It objects to the omission of the New Epsom & Ewell Community Hospital (NEECH).</p> <p>Individuals</p> <p>Question why the New Epsom & Ewell Cottage Hospital is excluded from the northern site parcel as it is understood that this facility is relocating to Epsom general hospital. The belt of vegetation along the B280 both shelters the housing from traffic and buffers Epsom Common SSSI from the housing. These act as wildlife corridors and should be carefully preserved during and after development. Horton Country Park,</p>	<p>The site allocation(s) will enable the efficient use of land and comprehensive masterplanning to deliver high quality development.</p> <p>As the sites are previously developed land it is important that efficient use of land is made, having regard to the sites.</p> <p>The Council have commissioned and published an updated Strategic Flood Risk Assessment (SFRA). A Level 2 SFRA has been produced for the sites identifying mitigation measures. The revised allocations refer developers to the site specific guidance in the Level 2 SFRA.</p> <p>Any future planning application will be supported by a site specific flood risk assessment.</p> <p>NHS have promoted site as part of a programme of estate consolidation.</p> <p>Consider any impact can be mitigated through design. The bridleways do not lie within the site boundary.</p> <p>The site(s) contain previously developed land.</p> <p>Assessments on impact on natural environment determined at application stage if allocated.</p>	

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	<p>which the site abuts, is a Local Nature Reserve and contains Habitats of Principal Importance and it will be important to protect such features from both direct and indirect impacts. Many comments that development must be kept to the previously developed part of the site and not exceed the existing footprint. West Park brief from 2005 suggests options for further development while retaining the constraints, such as the parkland setting and open land to the south. Range of comments on the size and types of houses to be provided. Mix of comments on density. Some thinking they will be too high, others thinking too low.</p> <p>Concerns that the area is prone to flooding and what mitigation will be in place. Suggestion of provision of a small retail unit. Concern about loss of NHS facilities at the site. Impact on nearby bridleways (equestrian use). Principle of building on Green Belt unacceptable. Concerns over scale. Impact on wildlife corridors and access to Horton Country Park. Concerns about impact on road network. Public transport would need improving with reference made to the E10 service. Site has limited sustainable travel options.</p>	<p>The Habitats Regulation Assessment (HRA) has not raised particular concerns with regards to this site.</p> <p>The Council has worked with infrastructure providers to understand needs arising from the Local Plan. We have published a Transport Assessment and Infrastructure Delivery Plan.</p> <p>There may be opportunities to secure improved bus services to the site as the allocations are considered through the planning application process.</p>	
SA6 Horton Farm	<p>Government bodies and statutory undertakers</p> <p><i>Natural England</i> – this is the largest allocation needing a high level of justification to pass requirements of GB release. It would need a very high-quality mix of green infrastructure and biodiversity net gain (if possible). An appropriate screen in place to ensure that the local area doesn't suddenly feel as though it's entirely subject to urbanisation.</p> <p><i>Thames Water</i> – scale of development likely to require upgrades to supply and wastewater infrastructure. Liaise with Thames Water early in application process.</p> <p><i>Historic England</i> – Grade II Listed building on site and draw attn to Long Grove and St Ebbas. HIA would be required for any proposal.</p> <p><i>Surrey County Council</i> - Scores highly in GB study. Convincing justification to exceed density of surrounding area. Landscape and visual impact assessment, masterplan and design code needed.</p>	<p>The number of dwellings anticipated on the site has been reduced to approximately 1,250 from a minimum of 1,500 and further detail provided on the amount of open space anticipated to be provided in the site, including a new public open space to the North of the site that is at the highest risk of surface water flooding.</p> <p>Justification for releasing relatively high scoring Green Belt based on exceptional circumstances and sustainability (accessibility of site to services and facilities) appraisal and NPPF tests.</p> <p>No strong evidence as to why self-build or Gypsy sites cannot be accommodated on the site, part of creating mixed and inclusive communities.</p>	<p>Policy renamed as Policy SA35 and updated to provide further details on considerations for the developing the site including capacity and guidance on the development that will be acceptable.</p> <p>Transport assessment undertaken to assess the cumulative impacts of local plan development.</p> <p>SFRA updated including a Level 2 for the site</p>

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	<p><i>Royal Borough of Kingston Upon Thames</i> – close to RNKC boundary and scores poorly in Transport Assessment. Concerned about pressure to local road network including Tolworth and Hook junctions of A3.</p> <p>Other organisations/ businesses/groups</p> <p><i>CPRE</i> suggest Horton Farm should be removed from the plan as a better performing parcel under the 2017 Green Belt Study. Understands there could be drainage issues and strain on infrastructure.</p> <p><i>Town and Country Housing</i> – may be delivered slower than planned. Custom build requirement could undermine affordable housing delivery as not grant funded by Homes England.</p> <p><i>Epsom Common Association</i> – site has no public access, raises possibility of rare species on site and concerned about impact on biodiversity. Impact on Horton Country Park and Epsom Common must be considered.</p> <p><i>Nonsuch Residents Association</i> – Horton and nonsuch do not have representation on planning committee.</p> <p><i>Stoneleigh and Auriol Neighbourhood Forum</i> – Do not support release of Green Belt.</p> <p><i>Green Party</i> - Logical in some respects but asks if necessary. If it goes ahead there needs to be more detail.</p> <p><i>Woodland Trust</i> - recommend an exercise to complete the Ancient Tree Inventory (ATI) across the site and setting a tree canopy cover target for the site, noting that an increase can only be achieved if existing trees are maintained.</p> <p><i>Epsom Civic Society</i> – do not support the allocation. If it is agreed, should take account of surface water run-off, Green infrastructure and sustainable modes of transport.</p>	<p>Areas of flooding risk isolated within site, and site can be designed so that buildings are not in areas of high risk. Have also published an updated SFRA, including a Level 2 assessment for the site.</p> <p>A sizable proportion of the site is proposed to be retained as public open space, including a substantive area to the North.</p> <p>Impact on infrastructure to be assessed by TA. No objections from infrastructure providers received to reg 18.</p> <p>RDA will not be lost a result of the proposal</p> <p>Development will be required to provide at least 20% BNG in accordance with the Local Plan policy.</p>	

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	<p>SCORA Concerned that site will be removed from Green Belt as high scoring, impact in infrastructure</p> <p>.</p> <p><i>Stamford and Horton Residents Association (SWRA)</i> – considers allocation disproportional to housing need in borough, concerned about removing higher scoring Green Belt and impact on infrastructure.</p> <p><i>Woodcote Epsom Residents' Society</i> – Points out this is a high scoring Green Belt site.</p> <p><i>Liberal Democrats</i> – It is unnecessary to build on Green Belt Site</p> <p><i>Sustainable Epsom and Ewell</i> – questions meaning of net zero homes commitment, suggests all developments should be designed to Green field run off rate, sustainable travel and a minimum Green Infrastructure requirement.</p> <p><i>Ewell Village RA</i> – Does not support greenfield development.</p> <p>Surrey Wildlife Trust – Must retain wildlife corridor functions.</p> <p>Individuals</p> <p>Listed Building and proximity to conservation areas not mentioned. Various prescriptive requirements suggested (e.g. Net Zero, green field run off rate, Heritage impact assessment etc.). High scoring Green Belt Site. Access concerns. Principle of building on Green Belt unacceptable. Self build requirement can hinder affordable housing delivery. Impact on wildlife corridors and access to Horton Country Park. Site not suitable for Gypsy and travellers. Concerns over scale of homes.</p> <p>Loss of stabling facilities. Density does not align with policy S3. Concerns about impact on road network. Lack of Infrastructure to support. Risk of flooding. Loss of equestrian facilities. Impact on biodiversity. Site promoter supports allocation. Concerns about impact on road network. Contradicts sentiment of policy DM6 on retaining equestrian (result in loss of RDA). The viability of the Horton Farm and Chantilly Way Greenbelt sites has not been adequately assessed and they should not be taken forward for development.</p>		
SA7 Land at Chantilly Way	Government bodies and statutory undertakers	The Council acknowledges concerns about release of Green Belt sites and that some comments	Now SA33. Site allocation wording updated to provide

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	<p><i>Historic England</i> - Highlighted that Grade II Listed Horton Farmhouse is nearby and policy should require a Heritage Impact Assessment to be submitted as part of any application.</p> <p><i>Royal Borough of Kingston Upon Thames</i> - Was concerned about accessibility and poor scores on Transport Modelling which will add pressure to local road network including Stress Points of Tolworth and Hook junctions.</p> <p>Other organisations/ businesses/groups</p> <p><i>Town and Country Housing</i> - Would like affordable housing considered on site and warns against unjustified infrastructure contributions.</p> <p><i>Liberal Democrats</i> - Believe it is not necessary to build on Green Belt but out of all sites suggested, this is the least damaging. And if it is necessary then supports 25 net zero homes.</p> <p><i>Epsom Civic Society</i> - Supports development on this site, helpfully providing historical context and suggesting flood mitigating measures and sustainable transport measures.</p> <p><i>SCORA</i> - Has no objection to the allocation.</p> <p><i>Cuddington Residents' Association</i> - Objects to building on Green Belt Land.</p> <p><i>Green Party (Mole Valley & Epsom and Ewell)</i> - Objects to greenfield development and drainage issues on the site.</p> <p><i>Stoneleigh and Auriol Neighbourhood Forum</i> - Objects to the release of Green Belt.</p> <p><i>Woodland Trust</i> - Has no objection to the allocation and suggests an Ancient Tree Inventory for Area may be incomplete.</p> <p><i>Sustainable Epsom and Ewell</i> – Explain what net zero homes means.</p> <p><i>Ewell Village RA</i> – Does not support greenfield development.</p> <p><i>Woodcote Epsom Residents Association</i> – does not agree with allocation on basis of high scoring Green belt parcel.</p> <p>Individuals</p>	<p>suggested this was relatively more acceptable than others (as well as historic context provided by Epsom Civic Society). The council maintains this site is low scoring Green Belt and that exceptional circumstances (acute housing need) exist to release it.</p> <p>It is grateful to Historic England for raising the proximity to Horton Farm House and whilst it was been considered, has heeded advice and will conduct a Heritage Impact Assessment of the site.</p> <p>With regards to impact on the highway network, overall the transport modelling does not show an un-mitigable impact.</p> <p>Infrastructure and affordable housing considerations will be considered in line with policy for others. The local plan viability assessment does not flag any viability issues in this area.</p> <p>It acknowledged concerns regarding flooding but a Level 2 Strategic Flood Risk Assessment has considered that, subject to details of a site specific FFR on application, there is good potential to mitigate flooding.</p> <p>The Council is still of the opinion that quantum suggested in allocation is acceptable and can be accommodated by design.</p>	<p>further detail on expectation of development of the site.</p> <p>A Heritage Impact Assessment has been undertaken.</p> <p>Updated SFRA published including a Level 2 assessment of the site.</p> <p>Safe access will need to be provided to the site, this will be considered at the planning application stage.</p>

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	<p>A number raised concern about the development potential of the site given flooding and proximity to a busy junction. A number also suggested the number of homes suggested were too many, linked to suggestions about how build form should be low rise and in keeping with surroundings. Other objections include lack of infrastructure and the risk of flooding to the site given its current use as a storm water retention pond. Some comments suggested the site would have a detrimental impact on biodiversity. A number of comments related to the perceived strain this would put on the highway network and safety of any access to and from the site.</p>		
<p>Policy SA8</p> <p>Land Adjoining Ewell East Station</p>	<p>Government bodies and statutory undertakers</p> <p><i>Natural England</i> - commented on allocation SA8 Notes Green Belt location and adjacent Priest Hill SNCI, which would have to be carefully considered when any proposal.</p> <p><i>Sport England</i> - Highlights para 99(b) of NPPF and Sports England's Exception test (E4) which states that the area of playingfield must be replaced.</p> <p><i>Thames Water</i> - No objection following high level review of impacts on sewers.</p> <p><i>Environment Agency</i> - Corrects allocation policy that non is in flood zone 3, but a special protection zone – principle bedrock aquifer.</p>	<p>Following representations from the Sutton and Ewell RFC and further discussions with the land promoter, the Council has concluded that the site is no longer available for development.</p> <p>It notes the observations from Natural England about proximity to SNCI and nature reserve, and concerns of other consultees on this matter, but for allocation purposes, believes in the potential of design to mitigate impacts and the development management process to scrutinise them more thoroughly. For the purposes of allocation in the plan, however, it is not considered reason enough to discount the site.</p> <p>It maintains that the re-provision of the sports facilities at Hook Road Arena will demonstrate</p>	<p>Allocation removed from Proposed Submission Local Plan as the majority of the site is subject to a long lease with no break clauses. The council therefore considers that the site is not deliverable over the local plan period.</p>

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	<p><i>Surrey County Council</i> - Concerned about densities proposed on site, and impact on Priest Hill Nature Reserve.</p> <p>Other organisations/ businesses/groups</p> <p><i>CPRE</i> - Objects to allocation because it is in Green Belt, nature reserve and lack of justification for retail floorspace.</p> <p><i>Epsom Common Association</i> - Suggests setting up a buffer zone between development and Nature Reserve.</p> <p><i>SANF</i> - Does not support release of Green Belt for New Homes.</p> <p><i>Liberal Democrats</i>- Do not support building on Green Belt site and concerned about impact on nature reserve. Sees some merit in re-provisioning derelict buildings near station.</p> <p><i>Green Party</i> - States site is high scoring Green Belt site and is close to SSSI.</p> <p><i>Woodland Trust</i> - Has no objection as no ancient woodland will be affected. It points out that no reference to established trees is mentioned, and recommends a tree canopy cover target and an updated Ancient Tree Inventory be undertaken.</p> <p><i>Surrey Wildlife Trust</i> - Objects to allocation due to impact on SNCI and BOA ND04 Epsom Downs and Nonsuch Park. Suggests smaller development along A232 would be more appropriate.</p> <p><i>Epsom Civic Society</i> - Does not support allocation as inappropriate location and will result in loss of playing field (Hook Road Arena too far away to be a viable replacement). Allocation will require a better train service and improved Green Infrastructure.</p>	<p>compliance with Para 99 of the NPPF and Sport England Policy E4.</p> <p>It also admits error in suggesting that the site is in “Flood Zone 3” in the plan and apologises for confusion caused. It notes the Environment Agency’s comments and separately notes an area designated at risk of Surface Water Flooding encroaches slightly into the red line area to the east, but the impact of this is considered mitigable in principle.</p> <p>With regards to objections over quantum and density, a meeting was held with SCC on 21/11/23 to unpack concerns raised. EEBC suggested there was a slight contradiction in SCC’s response insofar as it points to LTP4 and the general push towards directing development towards sustainable transport hubs on the one hand, but is objecting to higher density around this particular transport hub, on the other. No further evidence was put forward by SCC other than comments were based professional judgement, and so it was agreed that the success of how the density was accommodated would ultimately depend on the details of the application put forward.</p> <p>The Council recognises the general concerns from consultees on this matter and that prescribing a height limit of 6 storeys may have been too detailed for the allocation policy. It does however, consider that the suggested quantum (including retail) would still have been appropriate.</p>	

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	<p><i>SCORA</i> - States that exceptional circumstances will be required and site is high scoring GB site. Concerned about loss of playing fields. Heights inappropriate.</p> <p><i>Woodcote Epsom residence Association</i>. - Suggests there is no justification for release from Green Belt. Impact on playing fields and nature reserve and that proposed heights would be inappropriate.</p> <p><i>Sustainable Epsom and Ewell</i> - Recommends minimum % Green Infrastructure and questions loss of playingfields.</p> <p><i>Sutton and Epsom RFC</i> - Who uses playing fields, objects to the proposals and states that no prior engagement has taken place.</p> <p><i>Carter Jonas (representing Land Owner)</i> support the proposal on the grounds it will deliver objectives of the local plan.</p> <p><i>Ewell Village RA</i> – Does not support greenfield development.</p> <p>Individuals</p> <p>Several responses objected to the allocation on the grounds that it is in the Green Belt, citing its score in the evidence base among other reasons. Though the residential element was the main reason (with some conceding that a smaller scale development would be acceptable), a proportion also objected to the associated retail element.</p> <p>Several also objected to the scale and quantum of development based on perceived impact on character of the area and lack of infrastructure to support (or lack of evidence to show it). A high proportion of these objections were on the grounds of the indicative 6m height threshold. On transport, a high degree of concern was raised mainly regarding the potential exacerbation of traffic in the area. Several objected to the loss of playing fields and sports facility, questioning the practicality for existing users of re-locating provision to Hook Road Arena. Many noted that part of the site was in flood zone 3 and concerned about flooding on and from the site. Several people noted that the site was adjacent to a local nature reserve and the perceived consequential impacts the development might have for biodiversity in the area.</p>	<p>On matters of Green Belt, the Council believes exceptional circumstances (acute housing need) exist.</p> <p>Comments about infrastructure are also acknowledged, and addressed through infrastructure delivery plan. The County Council have conducted transport modelling based on the site allocation and the applicant will be expected to demonstrate appropriate access. It is also considered that the allocation would align well with SCC LTP4 insofar as it would capitalise on a sustainable transport hub.</p>	

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	<p>Other comments included some site specific suggestions (e.g. CCTV and lighting) and alternative sites (e.g. the Toby Carvery opposite or Longmead/Kiln Lane).</p>		
<p>SA9 Hook Road Arena</p>	<p>Government bodies and statutory undertakers</p> <p><i>Natural England</i> - Notes close relationship with adjoining residential development along its eastern edge and proximity to Epsom RDA.</p> <p><i>Thames Water</i> - Raises no concern after conducting high level review regarding wastewater.</p> <p><i>Sport England</i> - Objects to allocation subject to more detailed discussions about the proposed replacement provision.</p> <p>Other organisations/ businesses/groups</p> <p><i>Woodland Trust</i> - No objection as no ancient woodland will be affected. Critical that no reference to established trees is mentioned, recommends a tree canopy cover target and an updated Ancient Tree Inventory be undertaken.</p> <p><i>Surrey Wildlife Trust</i> - Considers the allocation will have an impact on the southern boundary of the site and requires that a wildlife corridor is maintained, and supports 20% BNG.</p> <p><i>CPRE</i> - Objects to the allocation on basis of high scoring Green Belt. Sports facility may be acceptable, but housing not appropriate.</p> <p><i>Epsom Civic Society</i> - Objects to allocation on Green Belt Grounds and access, and questions why net zero isn't a requirement as others in plan.</p> <p><i>Liberal Democrats</i> - Agrees with potential for sports/leisure provision but unconvinced by housing provision to enable it. Could also support provision for Travellers.</p>	<p>Though the site capacity has been altered to approximately 100 dwellings the proposed leisure facility remains part of the proposal. It will not be a substitute for Priest Hill (as the two rugby clubs have long leases on the site - see SA8 above).</p> <p>Comments about trees are noted and impact will be considered on application.</p> <p>The policy has been amended to require 20% BNG.</p> <p>Comments about the principle of Green Belt are noted, but it is considered that exceptional circumstances (acute housing need) exist to release the site.</p> <p>Specific reference to net zero homes has been removed but the site will be subject to energy efficiency and climate change policies in the local plan.</p> <p>Whilst housing may not or may not be necessary to enable the sports facility, the need for housing still exists. Traveller need has been proposed on other sites.</p>	<p>Now Policy SA34 Capacity reduced from 150 to approximately 100 dwellings.</p> <p>More prescription added to policy (e.g. access, landscaping, BNG and SUDs)</p>

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	<p><i>Green Party (Mole Valley & Epsom and Ewell)</i> - Surface Water Run Off needs to be managed. Objects to housing only but addition of leisure would be compromise.</p> <p><i>SOCRA</i> - Highlights high scoring Green Belt (and poplar trees on northern boundary) but suggests part redevelopment may not fully undermine purposes of it. Has reservations about access from eastern part of site.</p> <p><i>Woodcote Epsom residents society</i> - Questions ability to provide access from East.</p> <p><i>Cuddington Residents Association</i> - Highlights community events that happen on site and concerned about implication for Epsom Rising for Disabled.</p> <p><i>SANF</i> - Objects to allocation on principle.</p> <p><i>Epsom and Ewell Football Club</i> - Supports leisure use and suggests ideal location Epsom and Ewell football club. Highlights requirements of the club (level and type of pitch) and multi-functionality it would offer.</p> <p><i>Sutton and Epsom RFC</i> - Objects to allocation because it will be facilitated by the loss of their existing site.</p> <p><i>Cardinals Netball</i> - Supports new sports facility and highlights wealth of benefits it would bring.</p> <p><i>Surrey County Netball Association</i> - Supports use of site as a sports hub.</p> <p><i>GLF Schools</i> - Concerned about exacerbation of traffic.</p>	<p>The site is not within a flood zone but the policy will require SUDs to be incorporated into the scheme owing to surface water.</p> <p>Comments about infrastructure are also acknowledged, and addressed through infrastructure delivery plan. The County Council have conducted transport modelling based on the site allocation and the applicant will be expected to demonstrate appropriate access.</p>	

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	<p><i>Sustainable Epsom and Ewell</i> – Why not net zero homes?</p> <p><i>Ewell Village RA</i> – Does not support greenfield development.</p> <p>Epsom Common Association – Impacts UrBOA_3b on southern boundary – wildlife function must be retained.</p> <p>Individuals</p> <p>Several comments objected the allocation on the principle of it being Green Belt, it's related score and exceptional circumstances not existing. Some of these also objected to the scale of development and the loss of community space, including for events, horse riding and dog walkers, contrary to existing covenants. A significant amount of comments related to the leisure provision proposed in the allocation, some suggesting it should not simply be for the reprovisioning of fields lost at Priest Hill, but in addition, and that housing was not necessary to enable it.</p> <p>Others pointed to potential constraints which would hinder the provision, such as the shape of the site or drainage issues. Though there were some support for housing on the site, subject to affordable provision and suitable and green design, a number of comments expressed the contrary. Reasons included a perceived lack of infrastructure (particularly on transport) to support and flooding.</p>		
<p>Policy S6 Housing Mix and Type</p>	<p>Government bodies and statutory undertakers</p> <p>N/A</p> <p>Other organisations/ businesses/groups</p> <p><i>Liberal Democrats</i> - Plan lacks information about how affordable housing will be addressed and a target should be set.</p> <p><i>Iceni projects</i> - support the housing mix particularly for family homes, considers there to be higher than average proportion of households with dependent children.</p> <p><i>McCarthy and Stone</i> support the housing mix identified. Older people's housing is generally on small brownfield town centre sites and consist of a mix of one and two bedroomed apartments. Given the large need for older persons housing and benefits it can bring the policy should be amended to provide flexibility in housing mix to older persons housing and other specialist schemes.</p>	<p>The policy sets out the policy tenure recommendation to support development in the borough. This is informed by the most recent HEDNA (2023).</p> <p>The policy allows flexibility for development to respond to changes in evidence to adapt tenure provision accordingly. Whilst tenures proposed for development should reflect the housing mix recommended, as with all development, this will be balanced against other material considerations of the development site.</p>	<p>Policy changed from S6 to S5</p> <p>Policy wording amendments have been made to consolidate wording to be more concise.</p>

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	<p><i>WSP</i> considered the housing mix to be overly prescriptive and should not be applied rigidly but act as a guide and that it should be assessed on a site by site basis.</p> <p><i>House Builders' Federation (HBF)</i> notes that the policy assumes that some flexibility is clearly intended in the mix but suggests that the policy provides greater clarity to the decision maker that some circumstances may require different mix. Reference should be made to any future HEDNAs to account for any changes. Comments that HEDNA's are snapshots in time.</p> <p><i>Planning Potential</i> – welcomes approach but believe there should be more flexibility – e.g. suburban locations more suitable for family housing, urban for smaller types.</p> <p><i>Abri</i> – Supports intention to deliver range of accommodation but does not want policy to be too rigid.</p> <p>Individuals</p> <p>Some comments indicate general support for approach to mix. Other suggest that targets should be set out, whilst on the other hand others believe there should be more flexibility. Some felt that there was nothing addressing under occupation. There were varying comments indicating there should be either; more/less flats/homes/student accommodation/affordable homes/keyworker homes/sheltered housing.</p> <p>Some consider that tenure split should be shown. Some suggested the mix may influence population demographics. Some comments consider housing mix that is dominated by flats/smaller units would stagnate the market and that there is low demand for this type of housing. Some comments refer to prescriptive recommendations on design of new builds (space standards, density, etc.). Some question if the proposed housing allocations met the proposed housing tenures outlined. Various comments refer to individual design preferences for housing e.g.; lower density, communal gardens, development sympathetic to surroundings, no buildings taller than 4 storeys, eco homes etc.</p>		

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<p>S7 Affordable Housing</p>	<p>Government bodies and statutory undertakers</p> <p><i>Elmbridge Council</i> – Supports policy and notes viability reasons for discounting from small sites.</p> <p>Other organisations/ businesses/groups</p> <p><i>NHS Property Services Ltd Surrey Heathlands</i> emphasises the need to make provision for affordable housing for key workers- potential for first homes to meet this need. However the ICB would welcome further consultation on a range of affordable housing tenure e.g. shared ownership.</p> <p><i>Town and Country Housing</i> consider that the amount of social rented should be set out and enforced on applications- any ambiguity may be challenged and result in an undersupply of truly affordable homes and do not support 25% First homes.</p> <p><i>The Planning Bureau for McCarthy and Stone</i> commented on the requirement for a ‘review mechanism’ set out in point 5 of the policy, it is not supported by evidence or justification and therefore should be deleted.</p> <p><i>Planning Potential</i> supported the two tiered approach to affordable housing i.e. 30% on brownfield, 40% on greenfield, however raise caution that some sites might straddle the definition. They further proposed that viability testing should be considered more readily to ensure sites come forward and were supportive of a site-by-site approach to the tenure mix.</p> <p><i>Carter Jonas comments</i> referred to the proposed housing numbers as not meeting the need and therefore having a significant impact on affordable housing delivery. They suggested that the housing requirement needed to be increased and highlighted that there was a need to update the viability assessment due to higher development costs of recent times</p> <p>Individuals</p>	<p>The policy supports affordable housing in the borough which is informed by the HEDNA 2023 and the viability assessment 2023.</p> <p>The policy sets out the affordable housing expectation from future development in the borough and the requirements to provide justification should development not provide policy compliant affordable housing provision.</p> <p>Viability study update note will be produced.</p>	<p>Policy S7 has changed to S6</p> <p>The requirement for 25% of affordable housing provision to be First Homes has been removed as a prescriptive policy provision. This is due to the greatest need in the borough being for affordable home ownership products in the borough being for shared ownership product. These products are accessible to a broader range of the borough’s residents.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p>Comments consider that social rented housing should be mandated, others challenged the “review mechanism” in point 5. Some raised general concerns over the meaning of affordable housing. Other that that the policy should be more specific about who a/h should be for e.g. key workers/local people/young people.some referred to the need for commuted sums being ringfenced. Some that viability arguments may defeat a/h or that trade-offs will be detrimental to other “public goods”. Some had concern that First Homes will have little impact in the Borough. Some suggested the policy should be for local people. Some supported maximising truly affordable housing on brownfield sites. Some reiterated concerns that there is a lack of provision for homeless families in the Borough. Some refer to the requirement for housing to be net zero impacting affordability- and may impact viability. Some raised that there are too many caveats/opportunities for developers to challenge requirements. Some suggested that the current economic climate will mean the policy is not deliverable. Some question why there is a lower requirement for affordable housing on brownfield sites. Some object to the delivery of the housing in high rise blocks</p>		
<p>Policy DM1 Residential Standards</p>	<p>Government bodies and statutory undertakers</p> <p><i>Surrey County Council</i> - would like water efficiency standards to be more ambitious.</p> <p>Other organisations/ businesses/groups</p> <p><i>Town and Country Housing</i> – M4(3) requirement should be considered on a case by case basis.</p> <p><i>SCORA</i> Concerned about non compliance, disagrees with reducing space standards from previous plan to current (70 to 20sqm), does not support minimum densities and suggests density on movement corridors is contrary to S12 and S17.</p> <p><i>Home Builders Federation (HBF)</i> commented that national described space standard may not be always appropriate and can in some instances impact upon affordability issues and reduce customer choice. If evidence cannot be demonstrated to adopt optional space standards, then the policy should be deleted. Reference to M4(2) being made mandatory by Government in recent consultation. Suggests removing it to avoid an unnecessary repetition of building regulations in planning policy. In regard to 20% affordable units meeting M4(3) on major schemes, considered to be arbitrary uplift to evidence in the HEDNA and is therefore unjustified.</p> <p><i>Planning Potential</i> – considers requirement for 20% of affordable units to be wheelchair adaptable not practical.</p> <p><i>Abri</i> – Future Homes Standard should not be adopted because Government have not adopted it.</p>	<p>The policy sets out the space standards criteria for future development aligning with nationally described space standards. It is supportive of future developments that can exceed these.</p> <p>Conditions will secure building regulations requirements aligning with planning practice guidance.</p>	<p>The policy has been condensed and remains DM1.</p> <p>There are two new policies on Buildings Emissions Standards (DM10) and water (DM11). This policy is now shorter. Consideration given to building regs and space standards concerns. Maintain that each is has been viability tested.</p> <p>Whilst the minimum private garden space figures have been removed, a new requirement for a separation distance of 20 metres have been included within policy S12: Amenity protection.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p><i>WERS</i> Objects to decrease in private garden space.</p> <p>Individuals</p> <p>Some respondents had concerns that requirements aren't on a case-by-case basis. Others object to reduction in private amenity space for 3 bed houses (from 70 to 20 sqm) as insufficient to be functional or provide BNG. Others about flood risk, and suggested that it include surface water needs. Some respondents were concerned about relaxation of density standards (maximum to minimum). Some objected to nationally prescribed space standards. General support on repetition of building regs standards but need for flexibility. Particular objections to 20% affordable units meeting M4(3) standard on major schemes. Some suggested policy was not strong enough in requiring zero carbon, e.g, solar panels, heat pumps, EV charging, induction etc. One suggested the inclusion of solar panels/pv, heat pumps, electric charging, induction hobs, high efficiency insulation, suds and grey water harvesting systems should be a requirement. Some say the policy is weak with no commitment to adhere to actual sustainability standards and no demonstration the policy will minimise the impact on the environment. Others said policy doesn't go far enough, the Borough should be exceeding minimum standards One said para 5.36 does not consider huge amount of sewage overflow into the Hogsmill river every year. Some refer to utilities needing to be improved to meet demand</p>		<p>Where the market will allow, garden space can be higher. However, reducing garden space provides the flexibility to allow higher density.</p>
<p>Policy S8 Specialist Housing</p>	<p>Government bodies and statutory undertakers</p> <p><i>Elmbridge Borough Council</i> were supportive of the policy to deliver suitable specialist needs to cater for the most vulnerable members in society.</p> <p><i>Surrey County Council</i> suggested amendments: 1b of the policy should state 'and appropriate tenure and affordability mix is provided. Further suggest: Para 5.42 should reference extra care housing rather than the current wording of 'sheltered housing with care support'. Para 5.42 suggest referring 'Supported Independent Living'</p> <p>Other organisations/ businesses/groups</p> <p><i>Lichfields</i> supports the policy but suggests some flexibility to allow for local evidence to demonstrate the need at a specific point in time, suggests rewording to: 'Larger-scale new residential developments will be expected to consider the incorporation of specially designed housing / specialist accommodation, in line with the above criteria and based on local evidence of need at the time'. Supports the policy in principle however considers there to be too much focus on provision for older people. Student housing is not mentioned. S8 should adopt a broader definition of specialist housing. The glossary should be updated.</p>	<p>The policy is supportive of future development for specialist housing to meet the needs of a range of people in the borough. The policy encourages development for specialist accommodation to be located where there is good access to facilities, services, and public transport. The need for specialist accommodation is informed by the HEDNA 2023 and takes account of Surrey County council guidance for accommodation with care for older people and Planning Profile for accommodation with care for older people, Epsom and Ewell 2024.</p> <p>The policy focus has been broadened to acknowledge the demographics owing to educational establishments within the borough which includes student accommodation provision.</p>	<p>Policy S8 has now changed to S7.</p> <p>The policy has been worded with a broader reference to those included within specialist accommodation provision.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p><i>Epsom Civic Society</i> – requires further clarification on numbers, suggests elderly shouldn't be housed in isolation, and does not support high rise schemes for the elderly.</p> <p><i>UCA</i> supports the policy though considers there to be too much focus on provision for older people. Student housing is not mentioned. S8 should adopt a broader definition of specialist housing. The glossary should be updated.</p> <p><i>House Building federation</i> consider that the Council should allocate specific sites to ensure the delivery of older people. If sites cannot be allocated then the policy should provide an effective mechanism where decisions can be made on a need and supply basis. There should therefore be a commitment to monitoring the supply against the need. The policy should set out the need to help the decision maker.</p> <p><i>WERS</i> Concerned that the Guild Living proposal reflect the tenure mix set out in policy.</p> <p><i>McCarthy and Stone</i> emphasise the need to understand how the aging population affects housing need and make provision for older people. Offering older people a better choice of accommodation to suit their changing needs which can help them live independently for longer considering accessible and adaptable needs. They consider that older people's housing should not be required to demonstrate need.</p> <p>Individuals</p> <p>Comments made a number of suggestions on definitions e.g. Extra care rather than sheltered housing", "Supported Independent living, housing for younger people. Comments refer to flexibility with evidence requirements. Some comments refer to lack of reference to mental health care. Too much/too little provision for elderly. Some comments refer to the need for affordable specialist provision. Some comments considered that there was too much focus of provision for the elderly compared with other specialist accommodation provision/</p>	<p>The borough is heavily constrained and is the smallest in terms of geographical area. It is also the densest in surrey. The policy as set out is supportive of the aim to meet as much of the areas housing need as possible which includes an appropriate mix of housing types.</p>	
<p>DM2: Loss of housing</p>	<p>Government bodies and statutory undertakers</p> <p>N/A</p> <p>Other organisations/ businesses/groups</p> <p><i>Epsom Civic Society</i> commented that they would like to be consulted before houses are lost.</p>	<p>The policy sets out the criteria which should be met for development in the borough where the loss of housing is proposed. The policy has some flexibility within it to account for material considerations of each development to be judged on its merits.</p>	<p>Policy DM2 changed to DM3</p> <p>The policy has had minor changes to wording to reflect stronger protection to resist the loss of affordable housing.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p><i>Woodcote Epsom Residents Association</i> believes replacement criteria is too inflexible re: density.</p> <p>Other consultees:</p> <p>Replacements should be on brownfield sites. Redevelopments should be in keeping with surrounding area. Policy too vague. Clarifications needed whether all criteria (a-d) need to be met or only a subset. Higher density would not be a better standard. Housing should be condensed into tower blocks in the town centre. Should consider the impact on infrastructure. No loss of affordable housing should be allowed. Policy should be more rigid and specifically require “no net loss” of housing. No consideration given to environmental impact of demolishing a building. Specific suggestions re; parking reprovision, areas for increased housing, emphasis on refurbishments rather than rebuilds. A stock condition of the private rented sector (PRS) undertaken (not in HEDNA)</p>		
<p>S9 Gypsy and Travellers</p>	<p>Government bodies and statutory undertakers</p> <p><i>Reigate and Bansted</i> – Will be unable to accommodate any unmet need.</p> <p><i>Surrey County Council</i> - Supports policies. The provision of transit accommodation on well-travelled routes across Surrey, can help reduced incidences of unauthorised encampments.</p> <p>Other organisations/ businesses/groups</p> <p><i>Ewell Village RA</i> – Do not support pitches at Horton Farm but a review of sites on Kiln Lane is needed.</p> <p><i>Epsom Civic Society</i> Supports policy.</p> <p>Individuals</p> <p>Most comments deal specifically with allocations, specifically the proposed allocation at Horton Farm (see allocations).</p> <p>There is an overprovision of Gypsy and Traveller Sites in the Borough. There are currently vacant plots on the two existing sites that should be brought back into use. There is under provision of Gypsy and Traveller sites in the borough. The existing sites could be intensified to accommodate additional plots. Policy should prioritise Traveller families from Epsom. Questioning of evidence and the needs generated from it. Should require conditions of environmental responsibility.</p>	<p>The policy includes criteria to assess proposals for transit accommodation.</p> <p>The Council is required to plan for the needs of travellers, which are a protected group under the equalities act.</p> <p>The Council commissioned a Gypsy and Traveller Accommodation Needs Assessment to understand the needs for Gypsy and Traveller Accommodation over the Local Plan period.</p> <p>A core part of this process was interviewing the residents of the boroughs two traveller sites.</p> <p>The Council has engaged with Surrey County Council to understand the opportunity for intensification of existing public sites and it has been confirmed that the sites are currently at</p>	<p>Policy now S8 has been amended to include a requirement for new traveller pitch provision on appropriate large unallocated sites (windfall). This will assist in meeting the current unmet need.</p> <p>Produce a topic paper to document how meeting traveller needs has been addressed.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
		<p>capacity and that there is no opportunity to intensify the use.</p> <p>No new sites were identified for traveller pitches through the Call for Sites exercises.</p> <p>The policy seeks to protect the borough's existing traveller sites and provides a criteria based approach for considering new sites.</p> <p>Due to the scale of the unmet need (18 pitches) we have required 10 gypsy and traveller pitches at the Horton Farm strategic allocation. The requirement for traveller provision as part of sizable local plan allocation is not uncommon and is a key mechanism for assisting local authorities in meeting needs.</p> <p>The existing use value of land within the urban area limits the likelihood of traveller accommodation being deliverable.</p>	
S10 Retail Hierarchy and Network	<p>Government bodies and statutory undertakers</p> <p>N/A</p> <p>Other organisations/ businesses/groups</p> <p>UCA – Would like definition of main town centre uses to include education facilities.</p> <p><i>Stoneleigh and Auriol Neighbourhood Forum</i> – Agree with the hierarchy.</p> <p>Individuals</p>	<p>This is a strategic policy, which defines the hierarchy of the retail centres in the borough and directs town centre uses towards these. Stoneleigh and Ewell village centres contain a more limited amount/range of town centre uses in comparison to Epsom town centre and are therefore defined as local centres. This is supported by the Council's retail evidence.</p>	<p>No changes to policy</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p>Many comments consider the state of retail in general, and issues perceived to be damaging their vitality, e.g. expensive parking, transport issues. Some suggestions to move Ewell and Stoneleigh to “tier” 1 as currently too town centre centric. Some suggestions to change tier approach, e.g. “within 1 sqm of residents” or remove. Request for education to be a town centre policy.</p>		
<p>DM3 Primary Shopping Areas and Retail Frontages</p>	<p>Government bodies and statutory undertakers</p> <p>N/A</p> <p>Other organisations/ businesses/groups</p> <p>N/A</p> <p>Individuals</p> <p>Comments on the ambiguity and vagueness of policy. P162- markings for primary and secondary frontages too similar in colour. Frontages should be more extensive, more flexible, more prescriptive, respect the historic environment. Class E should be defined. Stoneleigh and Ewell not given enough priority in the policy. More control over signage</p>	<p>Further clarity could be achieved through identifying designations/policy requirements specific to Epsom Town Centre and Stoneleigh/Ewell local centres.</p> <p>The policy is in accordance with national policy and the current use classes order. Being too prescriptive could result in the policy becoming prematurely out of date.</p> <p>The policy seeks to maintain the vitality and viability of the town and local centres.</p> <p>The local plan contains a specific policies on signage and the historic environment.</p>	<p>Policy now DM4</p>
<p>DM4 Edge of Centre Proposals</p>	<p>Government bodies and statutory undertakers</p> <p>N/A</p> <p>Other organisations/ businesses/groups</p> <p><i>Liberal Democrats</i> Does not support the policy – sequential test does not work.</p> <p><i>Epsom Civic Society</i> – Suggests an image should be changed</p> <p>Individuals</p> <p>Policy is vague. Clarity of definition needed (town centre/out of centre). Many comments on lack of infrastructure to support. General sentiment against out of centre development as well as supportive of edge of centre development.</p>	<p>Town centre, edge of centre and out of centre all clearly defined in proposals maps, in policy and annexe 2 of the NPPF.</p> <p>Infrastructure policies are included elsewhere in the plan.</p> <p>The retail element which was proposed to be included as a requirement of the Ewell East allocation is considered suitable. This included</p>	<p>Policy Now DM5. No changes to policy.</p>

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	<p>Policy should emphasise that proposals should demonstrate need not just that there is no space within a town centre.</p> <p>Site allocations conflict with this policy (namely that there is a retail element for Ewell east). General comments about the need to support independent businesses.</p>	<p>small scale retail units (a neighbourhood parade) in a well connected location.</p> <p>The policy is seeking to maintain the vitality and viability of the existing town/local centres. Independent businesses are likely to seek to locate within these areas.</p>	
DM5 Neighbourhood Parades and Isolated Shops	<p>Government bodies and statutory undertakers</p> <p>N/A</p> <p>Other organisations/ businesses/groups</p> <p><i>Sustainable Epsom and Ewell</i> – Supports policies and believes cycle provision should be part of policy.</p> <p><i>Epsom Civic Society</i> - supports 15-minute city concept</p> <p>Individuals</p> <p>Generally supportive. Policy should require infrastructure to support. Policy is vague. Class F should be defined so that definition does not change if GDPO changes. Marketing requirements not tight enough. Parade at Manor Green should be extended. Restrict certain type of uses. Some local centres should be emphasised over others.</p>	<p>The policy is considered to contain an appropriate level of detail for neighbourhood parades and isolated shops and is in accordance with national policy.</p> <p>Infrastructure requirements are dealt with elsewhere in the local plan.</p> <p>Further detail could be added as to the definition of class F.</p>	<p>Policy now DM6. Clarification added to supporting text as to what F2(a) use class is.</p> <p>Review boundary of Manor Green Road</p>
S11 Economic Development	<p>Government bodies and statutory undertakers</p> <p>N/A</p> <p>Other organisations/ businesses/groups</p> <p><i>CPRE Surrey</i> considered that there is no case made for a Parade close to Ewell East Station. They considered the description of Kiln Lane and Longmead as “Industrial Estates” misleading as its predominantly wholesale, offices, retail and showrooms. They consider that there should be comprehensive redevelopment including affordable housing.</p>	<p>S11 is a strategic policy which supports the borough’s economic development for the future prosperity of Epsom and Ewell. The policy has been updated to provide flexibility for future development to adapt by supporting regeneration whilst protecting, safeguarding and intensifying uses. The policy should be considered against the local plan’s development management policies. The local plan contains policies that deal with development in particular economic areas.</p>	<p>Policy S11 has changed to S9</p> <p>The policy has been updated to provide a broader focus across economic industry areas in the borough as a whole.</p> <p>A new policy DM7: Employment land has been created to support future</p>

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	<p>WSP/SARL believes policy protecting loss of employment should not apply to allocated sites.</p> <p>SCORA – Supports policy</p> <p>Epsom Civic Society – Supports retention of strategic employment sites. Policy should explain use classes is referring to them.</p> <p>Individuals</p> <p>Many comments questioned what the focus of the policy should be (e.g. shopping parades, biodiversity, sustainability, supporting local workforce, Night Time Economy, reducing gap between rich and poor, hybrid working).</p> <p>A significant number of comments suggested that Kiln Lane and Longmead should be diversified to allow other uses, including housing. Some comments referred to the Vagueness of the policy, e.g. what does “highest protection and safeguarding” mean?</p>	<p>Protection for Kiln Lane and Long Mead for industrial purposes has been supported due to the economic value which they contribute to the borough. This is one of the key priorities contributing to sustainable development in the borough.</p> <p>The policy is informed by the HEDNA 2023 and Longmead and Kiln Lane Industrial Estate Economic Value report 2022.</p>	<p>employment land development providing protection, safeguarding and intensification focus for employment generating uses within Epsom and Ewell’s strategic employment sites to support its economy.</p>
<p>DM6 Equestrian and Horse Racing Facilities</p>	<p>Government bodies and statutory undertakers</p> <p>N/A</p> <p>Other organisations/ businesses/groups</p> <p><i>The Jockey Club</i> (own Epsom Downs Racecourse and Epsom Downs Training Grounds) highlights importance of the Racecourse industry. They suggest changes to paragraphs 1.44 and 2.4. They suggest changes to policies S1 (identify racecourse in Key Diagram & new words suggested), S11 (new words suggested). They broadly support DM6, however, they have various areas of concern:</p> <p>Non-racing vs. racing industry differentiation; no support for <i>racecourse</i>; Protection for training facilitates & establishments do not go far enough; Housing need not addressed; protection against development that impact on sustainability of industry; they further suggest new policies, related to: New development in the Racecourse Policy Area; Safeguarding the racehorse training industry; Protection against developments that impact industry; Training establishments</p>	<p>The policy supports and protects development for horse racing purposes. Epsom and Ewell’s racehorse training industry associated with Epsom Downs Racecourse sporting venue is unique to the borough and makes a positive contribution to the borough’s economy.</p> <p>The policy strikes the balance in supporting racehorse industry development. Due to its location, development will be subject to greenbelt policy considerations.</p>	<p>Policy DM6 Equestrian and Horse Racing Facilities has changed to DM8 Racehorse training industry.</p> <p>The policy has been focussed and condensed</p>

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	<p>Individuals</p> <p>Comments consider that the policy should retain equestrian facilities at Horton (Riding for the Disabled (RDA) Polo Club/Livery Stables) (more emphasis on RDA); Horton Farm allocation contradicts this policy; policy should be redefined as a more general rural sporting activities one; allocated equestrian sites should be more evenly spread through the Borough; equestrian is not just about racing – policy should support a wider and more equitable range of equestrian activities; Para 1 should read that developments should be designed sensitively; the policy is not required and that other things should be prioritised; the policy should expressly prohibit redevelopment of equestrian for housing; the industry perpetuates cruelty to animals and that it is a sport in decline; the protected zone too large and that run down facilities indicates lack of investment from horseracing community whilst other comments consider that the should be an increase in the size of the zone; traditional bus routes should be reconnected; question the need for policy focused on such specific activity.</p>		
<p>DM7 Visitor Accommodation</p>	<p>Government bodies and statutory undertakers</p> <p><i>Reigate & Banstead Borough Council</i> commented that; whilst they would support the proposed policy, they noted that the Surrey Futures Visitor Accommodation Study is eight years old and since then Air BnB and other platforms have expanded. Questions regarding the evidence being revisited in time for the Local Plan Examination?</p> <p>Other organisations/ businesses/groups</p> <p><i>Liberal Democrats</i> - Suggests the policy is too prescriptive.</p> <p><i>Epsom Civic Society</i> - Commented that they considered that encouragement & provision should be given for a camping, caravanning motor home recreational facility probably in the Horton Country Park/ Hook Road Arena location</p> <p>Individuals</p>	<p>Visitor accommodation in the borough supports the visitor economy in the borough. The policy sets out the approach to visitor accommodation development in sustainable locations in the borough whilst justification for any loss in visitor accommodation is sought via requirements to market the existing use.</p>	<p>Policy number changed from DM7 to DM9.</p> <p>Very minimal changes to the policy.</p>

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	<p>A significant number of respondents stated that there are already too many hotels in the borough; noted that there was Vagueness in the policy (more prescriptive evidence requirements to justify need); that there was no commitment in the policy; Should specify not on Green Belt; that the policy should emphasises links with sustainable transport; policy should support both high end visitor and low budget visitor accommodation.</p>		
<p>S12 Design</p>	<p>Government bodies and statutory undertakers</p> <p><i>National Grid (NGET)</i> pointed to Utilities Design Guidance; the pressure for development is leading to more development sites being brought forward on land that is crossed by National Grid Electricity Transmission (NGET).</p> <p><i>National Gas Transmission (NGT)</i> stated similar about National Gas Transmission infrastructure.</p> <p>NGET and NGT both advocate the high standards of design and sustainable development and that to ensure that Design Policy S12 is consistent with national policy they would request the inclusion of a policy strand that includes taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.</p> <p><i>Surrey County Council (SCC)</i> noted that in paragraph 7.7 that the council may produce development briefs and design codes that provide more prescriptive description for particular areas and opportunity areas. A prescribed approach in terms of ensuring improving health and wellbeing is a core aspect of any future design codes. The note The Office for Health Improvement and Disparities (OHID) will be producing guidance in Spring 2023 on this following DLUHC policy mandating of design codes. Surrey CC recommend including a reference to Healthy Streets in this policy.</p>	<p>The design policy encourages the highest standards of design balanced against the unique character of the borough without compromising on making efficient use of land. The policy includes flexibility within it whilst providing alignment with the National Design Guide and National Planning Policy. Provisions are made available to include design codes in the future.</p> <p>Design is an important way to incorporate the principles of efficient use of land which should be considered as part of the development process. As such, densities have been included within the Design policy (S11) to support design considerations for major development.</p> <p>Consideration of the impacts of development on residential amenity have been afforded separate consideration within the policy S12, however, the interaction between built form and the impacts of it</p>	<p>Previous Policy S12 has been split into two policies:</p> <p>S11: Design</p> <p>S12: Amenity Protection</p> <p>Design policy S11 integrates previous policy S3 (Making efficient use of land), therefore major development densities have been included to support development in line with the Town and Country Planning Act. Specific reference to the National Design Guide, has been included with additional flexibility to include further prescriptive elements within design codes in the future.</p>

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	<p><i>Reigate and Banstead</i> suggest providing a hook to any future design coding the Council may undertake, given that government is seeking local planning authorities to have a design code. Several Surrey authorities, including Reigate and Banstead are developing design codes and are willing to share their experience.</p> <p><i>Sport England</i> - would like policy to mention how design supports healthy lifestyles. Signpost to Active Design Guidance.</p> <p>Other organisations/ businesses/groups</p> <p><i>Woodland Trust</i> recommend amending; ‘<i>Preserve and enhance soft landscaping</i>’ by adding wording ‘<i>and maximise the opportunity to increase tree canopy cover</i>’. It is considered ‘this will support the Council’s Climate Action Plan and contribute to the delivery of mandatory Biodiversity Net Gain.</p> <p><i>Stoneleigh & Auriol Neighbourhood Forum (SANF)</i> state that any development within the designated area should be in keeping with the character of the area and conform to the SANF design codes for the designated area.</p> <p><i>NHS Property Services Ltd Surrey Heathlands</i> suggested further consideration on healthy design which recognises the wider determinants of health and promotes healthy and green lifestyle choices through well designed places</p> <p><i>NHS Property Services</i> suggest that the policy be amended to include healthy design aspects. They provide context to the connection between planning and health and the important role the planning system has in creating healthy communities.</p> <p><i>Green Party</i> – Question the need for a strategic design policy.</p> <p><i>Liberal Democrats</i> – would like policy to be accretive, residential property should meet BREEAM standards, flats should avoid overheating.</p>	<p>should be considered holistically when designing new development.</p> <p>Development design will also need to consider the planning policies of the local plan as a whole when designing development in the borough.</p>	<p>Policy S12: Amenity protection has been added to emphasise the consideration of health and well-being within future development proposals.</p>

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	<p><i>SCORA & Stamford and Horton Residents Association</i> – insufficient guidance on what high quality design means and in their experience development rarely complies with design policy. Requests a height policy of 8 storeys in the Town Centre 6 Storeys in transport hubs and 4 storeys elsewhere.</p> <p><i>Epsom Civic Society</i> - request a building heights policy; design codes, mention of net zero homes and question why only commercial properties are required to meet BREEAM standards.</p> <p><i>Sustainable Epsom and Ewell</i> – All development should meet BREEAM standards; mention net zero; request design codes and briefs to complement policy; height guidance and no fossil fuel heating.</p> <p>Individuals</p> <p>Some respondents suggest inserting policy hooks for further guidance e.g. design codes and health and wellbeing; concerned about vagueness/scope for interpretation and lack of prescription for some criteria e.g. climate change mitigation requirements and heights of buildings; general support for the importance of a design policy in the Local Plan; tall buildings in general and reference to proposing height limitations for new development; previous developments exhibiting poor design; areas should not be 'overdeveloped'; importance of sustainable design and materials used in new development. Specific renewable and low-carbon tech suggested for new builds; refurb and re-use prioritised over demolition and rebuild; 'passive house energy conservation'; good design is too subjective to be enforceable; a vision for Epsom Town Centre, Ewell Village and Stoneleigh local centres needs to be drawn up; emphasis should be put in this policy to require the contribution to the overall movement in the area, not just the development itself; there should be focus on people friendly spaces; prioritise pedestrians and cyclists over cars; new residential development should meet the specified BREEM standard, rather than requiring this for non-residential development only.</p>		
<p>S12 Protecting the Historic Environment</p>	<p>Government bodies and statutory undertakers</p> <p><i>Historic England</i>- Initial response suggested draft plan would comply with paragraph 190 of NPPF insofar as its vision and strategic objectives demonstrated a positive strategy for the historic environment. Subject to the specific inclusion of HEAN 12 in the text. However, despite support for policies the response highlighted a lack of evidence published with the consultation material (as required by para 31 and 193 of the NPPF) to convincingly show how the historic environment had been taken into account. It also suggested that the selection of sites had not been appropriately informed by a robust understanding of the historic environment, and pointed to Historic Environment Advice Note 3 for further advice. It then highlighted some heritage</p>	<p>Whilst Council maintains historic environment was a key consideration in the plan and site allocations, it acknowledges that evidence to demonstrate this was not published.</p> <p>Responses also prompted a thorough review of policy, and caused officers to reflect on length compared to others in the plan as well as amount of duplication of national policy in it.</p>	<p>Now S13. Policy reworded to be more "holistic". Sent to Conservation Officer, Historic England and SCC 7/2/24.</p> <p>Heritage Topic Paper drafted and Heritage Impact Assessments conducted on all proposed allocated sites in</p>

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	<p>constraints for SA1,2, 3, 4, 5, 6 and 7, concluding that heritage impact assessments should be required for any proposals (on application) on these sites. However, following actions taken by the Council a follow up response was received 2/10/24 from Historic England confirming it was satisfied that with the up to date information produced, the draft plan overcame all of the above concerns.</p> <p><i>Surrey County Council</i> - Suggested that certain features of the historic environment were omitted in a description of heritage assets in the policy, and that some of the content (such as repetition of NPPF and Heritage Statements) would be better placed in a DM policy. Anomalies and inaccuracies with the definition of buildings at risk were highlighted as well as the questioning of method for monitoring (suggesting a more general approach than the loss of Listed Buildings).</p> <p>Other organisations/ businesses/groups</p> <p><i>Stoneleigh & Auriol Neighbourhood Forum (SANF)</i> - Support the policy and a commitment to support neighbourhood plans.</p> <p><i>Woodcote Epsom Residents' Society</i> - Suggests that the policy largely repeats national planning policy,</p> <p>Individuals</p> <p>Several comments supported the spirit of the policy in protecting the historic environment and highlighted examples of important heritage assets in the borough, and instances where they had been "defended". Some expressed the view that the Council had not done enough to protect heritage assets to date, the general erosion of heritage assets, and that some site allocations will contradict the policy. Others expressed views that some minor impact may be required to achieve other objectives, or drew attention to the benefit that could come with allowing more development in conservation areas which otherwise would be appropriate for more dense development. In a similar vein, some suggested that the Council should re-think its approach to conservation, particularly the synergy between well-designed modern buildings and heritage assets as opposed to replicants of them. Some made comments on specific parts of the policy, arguing that instances where the loss of a heritage might be considered were too lenient (suggesting no demolition should be allowed until replacement plans approved. This was similar to sentiment expressed about the policy being too vague and doubt about its general compliance with other national policy and guidance.</p>	<p>Council acknowledges that there may be some outstanding disagreement with the County at the level of prescription in the policy, but believes that the inclusion of an appendices providing further guidance strikes a good balance between prescriptive advice "of Epsom" and keeping the plan itself focused and concise as per PPG Paragraph: 002 Reference ID: 61-002-20190315</p> <p>The Council does not agree with including reference to specific documents in main body of policy or preamble, but will reference "supporting documents" of each policy.</p> <p>It welcomes comments from those who believe the council has done a good job of protecting heritage assets to date, and acknowledges those who think the Council needs to do more.</p> <p>The policy as drafted can be clearer and strike a balance between protecting assets and allowing creative approaches to adapting them.</p> <p>On site allocations, the impact of heritage assets have been considered, demonstrated by Heiritage Impact Assessments and requirement for further detailed assessments to be required as applications come forward.</p>	<p>accordance with process set out in Historic Environment Advice Note 3 and 12.</p> <p>Proximity to Listed Buildings, Conservation Areas and Areas of Archaeological Potential entered as variables in site assessment methodology paper.</p> <p>Meeting with SCC held on 28/2/24 to discuss draft amended policies.</p> <p>Heritage appendix written to address concerns regarding lack of detail.</p> <p>Draft Heritage Topic Paper, Appendix and amended policies S13 and DM8 circulated to Conservation Officer, Development Management, SCC and Historic England 17/2/24.</p> <p>Response received from Historic England 2/10/24 (see Main issues raised for response)</p>

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			<p>NB: Further amendments made to S13 following HE response, following final comments from Head of Place that S13 should “read more like a policy”.</p> <p>Additional HIAs conducted on additional allocations.</p>
<p>DM 8 Heritage Assets</p>	<p>Government bodies and statutory undertakers</p> <p><i>Historic England</i> - As drafted HE requested the policy specifically reference to Registered Parks and Gardens and the national Register of Heritage at Risk. Please read in conjunction with summary of response to S13.</p> <p><i>Surrey County Council (SCC)</i> - raise concern about a number of perceived inaccuracies, such as conflating Listed Buildings and Locally Listed Buildings, and suggested some wording was inappropriate in its vagueness, leniency or presumption in favour of development. It reiterated HE’s highlighting of the omission of Historic Parks and Gardens and made specific suggestions about when Archaeological Assessments should be required.</p> <p>Other organisations/ businesses/groups</p> <p><i>Epsom Civic Society</i> - Would like policy to mention reviewing and introducing new Conservation Areas.</p> <p><i>SANF</i> - Wanted more detail in the policy as to how it will be implemented.</p> <p><i>Iceni Projects on behalf of Kingswood School</i> acknowledged heritage significance of Kingswood House School buildings and appreciate wording to facilitate sensitive infill development.</p> <p>Individuals</p> <p>Several respondents supported the policy as proposed and the principle of protecting heritage assets. Some took opportunity to bring attention to assets they thought worthy of protection. Some suggested the principle of some site allocations were intrinsically contradictory to the policy. Some raised doubts about the ability of the policy to be enforced/implemented. On the other hand, others suggested that the policy would hinder necessary adaptation and development (e.g. for sustainability reasons). Many expressed a desire to better democratise the management of heritage assets (e.g. access to information and involvement in designation).</p>	<p>The Council considered these responses in tandem with responses to policy S12, which have prompted a thorough review of both policies and re-writes. Broadly the council will seek to make the preamble and policy more concise, focused and not duplicative of national policy or guidance. It has also considered that some content (such as qualification trigger for an archaeological assessment) be better placed in the Council’s planning application validation checklist.</p> <p>It welcomes general support for the spirit of the policy and heritage assets in general.</p> <p>The policy neither prevents or commits to specific conservation area reviews or new designations but the strategic policy opens the door for this during the plan period (though not required to do so).</p> <p>Criticism of heritage’s perceived impediment to sustainability is recognised but it is considered sensitive adaptation would align with the policy.</p>	<p>Policy now DM13. See process for redrafting of S12, as this policy was considered with it.</p> <p>The policy is now more concisely worded.</p> <p>In recognition of a call for more guidance within policy as to what “is” and “isn’t” acceptable in proposals, an appendix to the local plan has been drafted.</p>

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		<p>On site allocations, the impact of heritage assets have been considered, demonstrated by Heritage Impact Assessments and requirement for further detailed assessments to be required as applications come forward.</p>	
<p>DM9 Shopfronts and Signage</p>	<p>Government bodies and statutory undertakers</p> <p><i>Surrey County Council (SCC)</i> would resist signage located on or over the highway for highway safety and/or capacity reasons. There are locations where projecting signs have been accepted historically and it is unlikely like-for-like replacements would be objected to.</p> <p><i>Reigate & Banstead</i> suggested the council consider making reference to any future design code work.</p> <p>Other organisations/ businesses/groups</p> <p><i>Liberal Democrats</i> commented on the council's staff capacity to enforce standards of design and size in the past without adequate resourcing.</p> <p>Epsom Village RA – Policy must be enforceable.</p> <p><i>The Green Party</i> considers that this could be dealt with in an Annex with reference made to it rather than being in the Local Plan. They suggest the Local Plan is not a document to propose changes to existing policies such as this or to repeat existing policy, as this detracts from core elements of the Plan itself.</p> <p>Individuals</p> <p>Many respondents expressed support for the policy without specific issues or concerns; some suggested policy include more prescriptive requirements; some that shopfront signage detracts from character of buildings and whether policy should be applied retrospectively; some that primary and secondary retail areas have a more cohesive appearance such as; Ewell Village should have more cohesive signage. Some</p>	<p>The policy focuses on the key considerations for shopfront development supportive of design which positively contributes to the character of the area.</p> <p>The policy cannot address poor shopfront design which has occurred in the past though it can seek to address improvements in shopfront design through future development proposals that come forward.</p> <p>Particular aspects of shopfront design are dealt with in further detail within the council's Shopfront Design Guide. Site specific requirements concerning development affecting heritage assets should be considered against Appendix 6 Guidance for proposals impacting heritage assets and 7 Heritage impact assessments as well as the NPPF.</p>	<p>Policy DM9 is now DM14 Shopfronts</p> <p>The policy has been condensed acknowledging provisions made within the 'Shopfront Design Guide'</p>

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	<p>expressed a dislike of 'garish' neon signage, large 'tv style hoardings, Estate Agents Sale boards. There were concerns about sign clutter causing hazards for people with disabilities / excessive use/ inappropriate siting. Some highlighted specific existing shopfronts and/or signage including being out of character/too large & prominent. There were concerns about the monitoring & enforcement of 'unlawful' signage in the borough. Some comments consider that policy should include 'skilled design and stakeholder involvement'. One proposed a 'minimum energy requirement'. Another suggested that illuminated shopfronts or signage should be turned off when premises is closed to the public.</p>		
<p>DM10 Landscape Character</p>	<p>Government bodies and statutory undertakers</p> <p><i>Surrey County Council (SCC)</i> recommends 'developers must submit a Landscape and Visual Impact Assessment (LVIA) to consider the landscape and visual impact of the proposal on the immediate and wider area'. They would suggest that a review is carried out of the recently published statutory public consultation by Natural England on proposed boundary changes to the Surrey Hills AONB.</p> <p><i>Natural England</i> highlights importance of landscape in allocation policies particularly given they are in or close to AGLV.</p> <p>Other organisations/ businesses/groups</p> <p><i>Liberal Democrats</i> – policy too focused on visual aspect of landscape and not its biodiversity value.</p> <p><i>Stoneleigh and Auriol neighbourhood forum (SANF)</i> suggests all green spaces should be designated areas.</p> <p><i>WERS</i> - Support policy without changes.</p> <p><i>Surrey Wildlife Trust</i> – Makes specific policy amendment suggestions to strengthen protection of ancient woodlands and biodiversity.</p> <p><i>Woodland Trust</i> - suggests additional landscapes including woodland pasture, historic parklands and ancient hedgerows.</p> <p><i>Vistry Group</i> – considers this a “proactive” policy.</p> <p>Individuals</p> <p>Suggested prescriptive requirements and changes to wording suggested to strengthen policy and widen its scope beyond the visual function (e.g. biodiversity, climate change); suggest that site allocations are not compliant with this policy; suggest that trees and/or hedges should be planted along/adjacent to roads to</p>	<p>The policy is considered to strike the right balance in addressing the impacts of development on landscape character when future development comes forward and should be read in conjunction with the wider policies within the local plan.</p> <p>The council has considered the potential impacts on landscape character within the sustainability appraisal. This has assessed sensitive landscape areas in the borough as part of the wider considerations. Landscape character is one of many planning considerations in the assessment of a site allocation being considered suitable. The local plan evidence base provides further supporting documents that has helped to shape the Local Plan.</p> <p>The Council has reviewed the AONB review, which discounted Epsom. EEBC' agrees with the findings of the review.</p> <p>The Council has been consulted in the AONB boundary review, which does not include extending into Epsom and Ewell.</p>	<p>Policy DM10 now changed to DM16</p> <p>The policy has been condensed removing duplication within the policy and with other policies in the local plan.</p> <p>Suggestion possibility that the requirements for LVIA is dealt with through validation checklist.</p> <p>LVIAs are now in the policy wording</p>

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	<p>protect landscape views from new development; raised about previous perceived lack of perception of particular sites and their landscape characters; e.g. Lack of protection for trees & tree roots during Ewell Bypass widening and Horton Lane widening/straightening. ; referred to wording that ‘the north and central core are more urban in character’; suggests that West Ewell is ‘green and quiet’. Inequity concerns; that more affluent people in south of borough are prioritised. Some general comments considered that nature, the environment, biodiversity, wildlife & open spaces should be prioritised over new development; raised that there is no mention of ‘carbon storage’ in the policy. Comments referred to taller buildings and their impact on the borough’s landscape character. Suggestions were made that the policy is expanded and incorporates no adverse impacts to important habitats, such as, but not limited to Sites of Special Scientific Interest and Ancient Trees.</p>		
<p>Policy S14 Biodiversity</p>	<p>Government bodies and statutory undertakers</p> <p><i>Natural England</i> welcomed the recognition of investment in areas with the greatest ecological potential (Biodiversity Opportunity Areas) and explained their role in securing BNG.</p> <p><i>Environment Agency</i> Satisfied with policy but request buffer zone for rivers as “blue” and “green” biodiversity are cumulative. Suggests requirements for ecological surveys should be included within policy.</p> <p><i>Surrey County Council</i> makes prescriptive suggestions to policy and recommended 20% requirement.</p> <p>Other organisations/ businesses/groups</p> <p><i>Sustainable Epsom and Ewell</i> - Support policy and emphasise need for allocations to consider impact on designated areas, use nature corridors and allotments to help promote Biodiversity.</p> <p><i>Liberal Democrats</i> – Suggests most developments will have an adverse impact on biodiversity, 10% BNG not sufficient and should be secured in the borough. Suggests plan needs to be subject to EIA.</p> <p><i>Surrey Wildlife Trust</i> – Makes prescriptive suggestions including 20% requirement.</p> <p><i>SANF</i> Suggest all applications should consider impact on biodiversity.</p> <p><i>Epsom Common Association</i> - suggests policy is piecemeal, reminds council of its own nature sites, and little evidence of the Council to improve the condition of them.</p> <p><i>Epsom Civic Society</i> – Highlights allocations next to sensitive biodiverse sites and makes various prescriptive suggestions to change the policy.</p>	<p>The policy supports development where it protects biodiversity and geodiversity</p> <p>The original policy has been separated to deal with biodiversity net gain within it’s own policy (S14). 10% biodiversity net gain has been set as a minimum aligning with NPPG and the Environment Act 2021.</p> <p>Buffer from rivers is dealt with in flood risk policy.</p>	<p>The policy remains S14 Biodiversity and Geodiversity</p> <p>A new policy has been created; S14 Biodiversity Net Gain.</p>

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	<p><i>Town and Country Housing</i>: suggest the council could consider a biodiversity credit/off setting scheme, whereby contributions are calculated per biodiversity unit and given to the council to provide net gain elsewhere. They say that this has worked successfully in the past on development sites they have worked on in Tunbridge Wells LA</p> <p>Individuals</p> <p>Some respondents wanted specific wording changes and additions requested; calls for various strategies to complement policy; general concerns expressed about biodiversity on site allocations; questioned various aspects of Statutory BNG requirements; General support for the policy and importance of promoting biodiversity but concerned about the loss of biodiversity & wildlife nationally. Some view proposals to be in contradiction to the UKs Biodiversity and Environment objectives; BNG allocations need to be protected and maintained for a sufficient period. Noted that the areas would need at least 30 years, which is difficult 'in view of likely funding problems of maintenance, climate change, droughts and other human pressures. Also there were concerns about the Site Allocations in the draft Local Plan and impact on biodiversity and wildlife; on existing Green Belt; particularly: Horton Farm, Ewell East Station (and adjacent Priest Hill Nature reserve), Hook Road Arena (concerns about the artificial pitch).</p>		
<p>DM11: Trees, woodland and hedgerows</p>	<p>Government bodies and statutory undertakers</p> <p><i>Surrey County Council (SCC)</i> recommended that in the supporting text make reference to the benefits of underground cellular systems. Suggestions for the key supporting documents section include national policy on trees outlined within Paragraphs 131 and 180 of the NPPF.</p> <p><i>Natural England</i> welcomed the policy. Seeing the promotion of tree lined streets is a good thing as this has been shown to be beneficial in a changing climate to help counter-act the impact of the urban heat island effect.</p> <p>Other organisations/ businesses/groups</p> <p><i>Surrey Wildlife Trust (SWT)</i> suggest policy should be clearly crossreferenced with policy on biodiversity.</p> <p><i>The Woodland Trust</i> did not support the policy as written and made comments/suggestions. They were concerned that it was basic. Concerns included that it appeared to refer solely to urban trees with no mention of woods or hedgerows. They recommended wording regarding developments that caused harm/loss to ancient woodland or to protected trees or hedgerows, buffer zones for areas of protected woodland in addition to the wording in on root protection areas for individual trees. They also proposed a presumption in</p>	<p>Certain trees are protected in the borough by Tree Preservation Orders. Whilst it is not possible to protect all trees within the borough, the draft Local Plan policy seeks to introduce a policy approach that retains and enhances existing woodland, trees and hedgerows that make a significant contribution to area whilst protecting ancient woodland and ancient and veteran trees. It also seeks to encourage the inclusion of trees within public spaces.</p>	<p>DM11 is now DM17. Policy wording strengthened to focus policy wording to align with national policy</p>

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	<p>favour of the retention of existing trees and hedgerows on development sites unless demonstrated to be unviable, replacement trees, canopy cover, natural drainage solutions boundary treatments, preference for planting native broadleaf species.</p> <p><i>Town and Country Housing</i> supported the policy but considered that wording should include; 'To be dealt with on a site by site basis with the support of an independent Arboricultural report provided by the applicant'.</p> <p><i>Liberal Democrats</i> – Supports policy with changes as does not differentiate between species, which provide different levels of carbon capture.</p> <p><i>Green Party</i> – would like the council to better explain how site allocations meet the objectives of this policy. It makes specific suggestions including to base replacement on a tree valuation method such as CAVAT or i-Tree Eco.</p> <p><i>Cuddington Residents Association</i> – Does not support policy as written and points to trees with TPOs that have been removed in the past.</p> <p><i>Sustainable Epsom and Ewell</i> – Support but with caveats e.g. hedgerows are not addressed in policy despite title.</p> <p><i>Epsom Civic Society</i> Support the policy with caveats – e.g. it does not support hedgerows. Very similar to Sustainable Epsom and Ewell.</p> <p><i>SANF</i> – concerned about the impact of infill development on trees.</p> <p><i>Epsom Common Association</i> – concerned that replacements cannot just be saplings.</p> <p><i>Surrey Doormouse Group</i> - trees must be included in any new development.</p> <p><i>CPRE Surrey</i> - suggests policy be complemented by proposals to increase tree cover in the borough.</p> <p>Individuals</p> <p>Many respondents were in support of principle of policy but significant concern of wording and ability to enforce.; considered that the policy is misleading (i.e. nothing about hedgerows); concerns were raised about the loss of green belt as a result of the draft local plan, particularly on the greenbelt site allocations; raised concern about loss of trees due to developments; (TPOS) should be less stringent when located in people's properties and some TPOs were not appropriate; tree lined streets were not a good solution whilst others suggested more trees on high streets; hedgerows need more protection due to being a habitat for bird species; concerns about the impact of trees on pavements and trip hazards</p>		

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<p>S15 Flood Risk and Sustainable Drainage</p>	<p>Government bodies and statutory undertakers</p> <p><i>The Environment Agency (EA)</i> recommend the inclusion of setback requirement of 8 metres from riverbanks and existing flood defence infrastructure. With the upcoming BNG metric, any developments within 10m will be penalised on their score within the metric. Referring to this in the supporting text of this policy may be pertinent to ensure that all developers are aware of the multiple benefits of increasing the distance away from main rivers. The EA also make recommendations on finished floor levels, flood storage compensation, functional floodplain (FZ3b) culverted main rivers and EA responsibilities and non-EA responsibilities (i.e. emergency planning such as access and egress)</p> <p><i>Natural England</i> considers SuDs key to ensuring new development are designed to mitigate the impacts as wholly as possible on site. Having a well interlinked network of SUDS within the borough will be a beneficial thing in future with the increased rainfall events and also higher temperatures as these habitats can help to mitigate these issues.</p> <p><i>Thames Water</i> support policy S15 in principle. They consider that the policy should make it clear that the policy relates to all forms of flooding including sewer flooding. In some instances it will be necessary for upgrades to the sewerage network to be delivered ahead of the occupation of new development to avoid the risk of sewer flooding either on or off site. In relation to delivery of SuDS, the policy should require that developments should aim to achieve run off rates as close as possible to greenfield run-off rates in line with guidance produced by CIRIA.</p> <p><i>Surrey County Council</i> suggested updating the 2018 SFRA and specific policy wording.</p> <p>Other organisations/ businesses/groups</p> <p><i>Woodland Trust</i> – made specific policy wording suggestions to enforce SUDs.</p> <p><i>Epsom Common Association</i> – policy must stipulate “no net increase in surface water” essential.</p>	<p>Has uncovered ambiguity as to meaning of “critical drainage areas” which inform the SFRA after the now outdated Surface Water Management Plan.</p> <p>This will be addressed in new SFRA.</p> <p>Will ensure approach to surface water flooding aligns with NNPF and NPPG.</p>	<p>Policy is now S16. The SFRA has been Updated to support the Local Plan</p> <p>All EA requirements now in policy including</p> <ul style="list-style-type: none"> ● 8m set backs ● 300mm floor level ● Culverting ● FZ 3b definition (See SFRA)

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	<p><i>Epsom Civic Society</i> – Raise the importance of sewer limitations, incremental impacts and some specific policy wording.</p> <p><i>Town and Country Housing</i> - suggest flooding should be dealt with on a case-by-case basis.</p> <p><i>Sustainable Epsom and Ewell</i> – raise the importance of SuDs, infrastructure and cumulative impact on flooding of smaller developments. Suggest that Epsom and Ewell Green Infrastructure Study 2013 should be a key supporting document.</p> <p>Ewell Village RA – Policy must be enforced.</p> <p><i>Town and Country Homes</i> – each site should be dealt with on a site-by-site basis via FRA</p> <p>Individuals</p> <p>General Support for policy. General concern about cumulative impact of new development on flooding, particularly on certain development sites, around main rivers (and contrarily, that the plan only considers fluvial flooding). More enforcement of SuDs is needed. Policy should require householder storage for rainwater, make driveways and patios porous. Policy does not provide enough guidance as to when a site specific FRA is required, Some concern over ambiguity of wording. Policy omits reference to Southeast Rivers trust Wetlands project on Chamber Mead and doesn't emphasise a Natural Flood Management approach enough.</p>		
DM12 Pollution and Contamination	<p>Government bodies and statutory undertakers</p> <p><i>Environment Agency</i> – Pleased with policy and believe well written re: controlled waters and acknowledgement of Surrey Waste Plan. Makes suggestions about application process (e.g. pre app advice), improving capacity to deal with waste water, water resource planning, (including more stringent water capacity standards of 110/l/p/d), it's duty as a consultee in the case of non mains foul sewage.</p>	Satisfied that stat consultees are mostly happy with the policy. All wording amendments considered but mindful of balancing prescription with the need for policy to be focused and concise.	Typos corrected Moved survey requirements to validation checklist.

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	<p><i>Thames Water</i> – Supports policy but raise odour as an issue related to air quality, and lighting.</p> <p><i>Natural England</i> expects the plan to address the impacts of air quality on the natural environment. It should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. They refer to substantial changes in air pollution policy, including European judgements such as the Dutch Nitrogen case and People Over Wind. Natural England released detailed advice on the procedure for air quality assessment in 2018.</p> <p>Other organisations/ businesses/groups</p> <p><i>The Woodland Trust</i> make specific reference to including “natural solutions” within the policy.</p> <p><i>Sustainable Epsom and Ewell</i> Support the policy. Raise concerns about spillages / discharges into the Hogsmill River, lack of reference to groundwater source protection sources and lack of prescription on light levels.</p> <p><i>Epsom Civic Society</i> – Support with changes. Also raised concern about spillages in Hogsmill. Questions how AQMA declaration has been measured. Believes policy should better relate to ground water protection sources and define what an acceptable level of light is for biodiversity.</p> <p><i>CPRE</i> Concerned about sewage discharge into the Hogsmill.</p> <p><i>Epsom Common Association</i> – Also concerned about sewage into the Hogsmill.</p> <p>Individuals</p> <p>General support for policy, and concern about increases in pollution arising from development proposed in the plan. Some pointing to a perceived contradiction between allocating sites for development and reducing</p>	<p>Will also “tighten up” where ambiguities exist.</p> <p>Acknowledges concerns with current pollution emitters in the borough, and whilst policy seeks to address issue in general, is not itself an enforcement plan, and so alleged breaches etc. is dealt with through other means.</p> <p>We are continuing to engage with water suppliers and waste water infrastructure providers through the IDP and other means to secure infrastructure.</p>	<p>Stand alone water policy created.</p> <p>Preamble amended to avoid duplication. Reference to water stress included (as per EA request).</p> <p>All policy wording tightened up.</p> <p>Pathways given own letter to differentiate between them.</p> <p>Introduced requirements more stringent than BR for 110 L/P/D rather than 124L/P/D in housing standards policy.</p> <p>Reference to technical docs. Added.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p>pollution. Some believe the policy should be more stringent, or it should be tapered more depending on scale of development. Sewage spilling into the Hogsmill also an issue. And perceived specific emitters of pollution in the borough. Some suggested specific policy wording to tighten it up including reference to SUDs requirements, RADON, charging points and expanding ULEZ.</p>		
<p>S16 Infrastructure delivery</p>	<p>Government bodies and statutory undertakers</p> <p><i>Mole Valley District Council</i> – Notes SEND and Early Years need are yet to be quantified.</p> <p><i>Thames Water timescales</i> points to necessity for developers to engage early with Thames Water as they have limited powers to prevent connections to their networks.</p> <p>Other organisations/ businesses/groups</p> <p><i>SANF</i> – concerned about impact on infrastructure from Green Belt Sites and Stoneleigh and Auriol becoming “Cut throughs”</p> <p><i>Ewell Village RA</i> – suggests more emphasis on consultation and engagement at early stages of planning process</p> <p><i>NHS Surrey Heartlands</i> – supports policy and requests Council to continue to engage with health providers.</p> <p><i>NHS Surrey Heartlands</i> - Council should continue to seek S106 and CIL contributions for health services and collaborate through IDP.</p> <p><i>WERS</i> – Infrastructure is important to mitigate impact on communities.</p> <p><i>Epsom Civic Society</i> – Policy is broad-brush and should address cumulative developments.</p> <p><i>Woodland Trust</i> – Suggests contribution should include to Green Infrastructure.</p> <p><i>CPRE Surrey</i> Questions whether funds are available to accommodate infrastructure for level of population growth proposed.</p> <p>Individuals</p> <p>General concern about the impact of development proposed on infrastructure, predominantly on highway network. Many roads specifically named. Other issues include, but not limited to, schools and healthcare. General concern about ability of Council to deliver (funding, dependency on utility providers/county etc.) Concerns about the prematurity of plan when infrastructure issues not sufficiently covered. Comments</p>	<p>Concerns acknowledged.</p> <p>Policy intends to deal with how infrastructure will be considered, but gist of feedback is about the capacity of the borough to accommodate development in general.</p> <p>Observed a general misinterpretation of the chronology of the plan making process in that:</p> <p>We have gone as far as we can for a reg 18 plan by showing spatial strategy, which is informed by need, not necessarily current capacity.</p> <p>Once strategy to deal with need is established and agreed (post reg. 18), and shown to infrastructure providers through this consultation, we will then update the Infrastructure Plan to provide evidence as to what is required and how to support delivery.</p> <p>Comments will also help to inform these discussions.</p>	<p>Policy now S17. Typos corrected.</p> <p>Conducting Transport Assessment to determine needs following spatial strategy.</p> <p>Continue to engage with infrastructure providers and update Infrastructure Delivery Plan.</p> <p>Amended policy as necessary.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p>emphasising need for sustainable transport infrastructure and EV charging. Vagueness of policy. Lack of evidence to inform what is needed. Comments on past performance of council e.g. 6 years to deliver retail infrastructure at former hospital site.</p>		
<p>S17 Green Infrastructure</p>	<p>Government bodies and statutory undertakers</p> <p><i>Natural England</i> - Consider the policy includes a good level of detail and supportive of the policy as written.</p> <p><i>Environment Agency</i> - Would like policy to cover blue as well as green infrastructure (e.g. main rivers).</p> <p><i>Surrey County Council</i> - Consider that the policy should define blue and green infrastructure in line with SCC definition, reference case studies document by SCC and refer to health benefits of policy.</p> <p>Other organisations/ businesses/groups</p> <p><i>CPRE</i> Commends policy but suggests that plan as a whole conflicts with it due to site allocations. Also suggests policy should be more positively worded and highlight role of gardens, allotments and farmland to green infrastructure.</p> <p><i>Green Party</i> - Believes that the policy partly contributes to delivering sustainable development but the plan as a whole should go further.</p> <p><i>Stoneleigh and Auriol Neighbourhood Forum (SANF)</i> - Supports the policy.</p> <p><i>Epsom Civic Society</i> - Would like wording to be more committal (rather than “encourage” or “consider”) and the policy safeguarding local green amenity sites and preventing hard surfacing and artificial grass, requiring green roofs.</p> <p><i>Ewell Village RA</i> – the policy must be rigorously enforced.</p> <p><i>Sustainable Epsom and Ewell</i> - vague polices,, should include ref to gardens, inconsistent with the Green Infrastructure Strategy 2013 (re Green Belt), should reference Green Roofs.</p> <p><i>Woodcote Epsom Residents’ Association</i> - Is concerned that the policy does not safeguard existing green spaces.</p> <p><i>Epsom Civic Society</i> – Policy is vague and should be specific about safeguarding and including back gardens.</p>	<p>The Council acknowledges the general support people have for the spirit of the policy.</p> <p>It agrees that “Blue Infrastructure” should be incorporated as part of it, and can add reference to SCC’s case studies in the supporting documents section of the policy, but will stop short of replicating an SCC definition verbatim because there is not a concise version and also because the policy is not contradictory to SCC’s definition.</p> <p>We will include reference to wider examples of Green and Blue Infrastructure in the preamble.</p> <p>Whilst the preamble speaks in more general terms about what G&B infrastructure can encourage, on re-reading the policy it is considered that it is strong enough to require compliance.</p> <p>It is considered that to include a prescriptive list of what G&B I measures should be required or what should be “banned” would narrow the scope of the policy too much.</p>	<p>Changed to Policy S18. Policy amended to include Blue Infrastructure.</p> <p>Preamble amended to reflect more specific examples and benefits of G&B infrastructure.</p> <p>Policy wording amended slightly e.g. by removing reference to Green Infrastructure Strategy.</p> <p>SCC Supporting Doc. added.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p><i>Woodland Trust</i> - LNRS should be included and suggests some specific amendments.</p> <p>Individuals</p> <p>Several respondents used opportunity to reiterate their objection to releasing Green Belt land for development, some drawing parallels between the benefits of Green Infrastructure and Green belt, and the consequences of their loss. Some made very similar comparisons with biodiversity gain and loss. Some requested the policy be much more prescriptive in requiring or restricting features in development e.g. trees or (in the latter case) fake grass or generally that the policy be more ambitious in requiring mandatory compliance. Some comments referred to concerns about the uncommittable wording (“encourage”, “should” etc.) as well as prescriptive suggestions on improvements. Many of these were about “strengthening” the policy e.g. when and where off-site measures will be accepted. Others raised concern about the unintended consequences of the policy on issues such as viability (cost of implementation and maintenance) and design (suggesting that features such as Green Roofs can be unsightly). There we a number of positive comments about the spirit of the policy. Comments were raised about the definition of Green Infrastructure and several echoed the County’s request to include “blue” infrastructure in the policy. Some comments considered that the site allocations are intrinsically at odds with the policy, by for example, negatively impacting Green Infrastructure at Horton Farm and Hook Road Arena.</p>	<p>Concerns about viability of requirements are addressed strategically through the viability assessment of the local plan, which includes this policy.</p> <p>The Council acknowledges the perceived contradiction in allocating sites with seeking to preserve G&B Infrastructure, but all development will be subject to this policy if the plan is adopted.</p>	
<p>DM13: Community and Cultural Facilities</p>	<p>Government bodies and statutory undertakers</p> <p>SCC believes that provision will be needed for early years but because 80% of the sector is private or voluntary, it is difficult to predict what the need is or will be over the plan period.</p> <p><i>Reigate and Bansted Council</i> – Policy should include public art.</p> <p>Other organisations/ businesses/groups</p> <p><i>SANF</i> supports the policy and likes the idea of hubs in para 9.23, suggesting examples exist in Stoneleigh and Kingston parade.</p> <p><i>Laines Theatre Arts</i> – Maximise potential of Epsom Playhouse.</p> <p><i>Theatres Trust</i> – Would like the criteria for removal based on economic viability to be removed because it can be manipulated.</p> <p>Individuals</p> <p>There is a support for cultural facilities but a general concern about the lack of them in the borough. A number of comments alluded to a perception of vagueness in the policy, e.g. how is need for such a policy worked out and how is a cultural use defined (re; diversity of facility including for young people)? Others had views about</p>	<p>A meeting was held on 21/11/23 with SCC to discuss response. No further information on early years provision was given.</p> <p>The Council acknowledges the strong feeling of affinity to community and cultural facilities expressed by respondents.</p> <p>It has considered possible alternatives to the wording, so the policy does not appear as vague. It does consider that all the uses described are appropriate in this policy, particularly in the interests of keeping the plan “focused and concise” as required by the NPPF.</p>	<p>Changed to DM20.</p> <p>Additional paragraphs have been added to the preamble to emphasise how the Council will deliver community and cultural facilities as well as signposting to “marketing requirements” in new appendix 3.</p> <p>No other amendments have been made.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p>the rigidity of the policy. E.g. that it should be worded in the negative (e.g. when development should be refused) and all proposals should meet all conditional criteria in the policy rather than some. Some suggested that the policy conflated critical services (e.g. education / healthcare) with entertainment facilities (theatres/pubs). Some comments suggested that site allocations contradict this policy (e.g. loss of Hook Road Arena and Priestfield are essentially the loss of community facilities). A number of respondents were concerned about the level of provision of existing facilities and the emphasis on improving provision as a condition of development. A number highlighted existing facilities they know about which they felt should be afforded some level of specific protection e.g. Epsom Playhouse, the Horton Centre and the Wells Centre. A number of respondents used this question to reiterate their opposition to building on Green Belt Land.</p>	<p>The Council does not agree that the policy should be worded negatively as this would be contrary to the spirit of the NPPF which expects a positive and proactive approach to delivering sustainable development.</p> <p>The Council is satisfied that all three criteria 1 a, b, and c should be met when considering community facilities in the interests of sustainable development and does not think that 2 a-c should be accretive as b and c are alternative to each other.</p> <p>The Council acknowledges the perceived contradiction in allocating sites with community facilities on them for other uses, but these have been considered on a site by site basis, weighed against other strategic needs, which are discussed in the LAA and other site selection appraisals.</p> <p>The well-known community facilities mentioned specifically by respondents would be protected by this policy and it is not considered necessary to introduce policies safeguarding each individual site. Keeping the plan focused and concise is one reason for this.</p> <p>Issues regarding protection of Green Belt land are dealt with in the relevant section of this statement, as the purposes of Green Belt do not include safeguarding for community or cultural use.</p>	

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
<p>DM14: Education Infrastructure</p>	<p>Government bodies and statutory undertakers</p> <p><i>Surrey County Council (SCC)</i> indicate population growth in Epsom will require school places. Demand for reception places expected to reduce, year 7s will increase but fluctuate. Suggests SCC will continue to liaise with EEBC on case by case basis, funding new places through CIL.</p> <p>Other organisations/ businesses/groups</p> <p><i>SANF</i> would like infrastructure for education to be considered proactively.</p> <p><i>University for Creative Arts (UCA)</i> welcomes support for education but points our minor error in name. GLF Schools would like the plan to maximise existing school provision. This is echoed by Kingswood school who also support opening facilities up for wider community use.</p> <p><i>Woodcote Epsom Residents Association</i> – plan should make provision for new facilities, not extend new ones.</p> <p><i>Epsom Civic Society</i> – Should give consideration to private and pre school provision.</p> <p>Individuals</p> <p>A general concern about the current lack of schools, educational facilities and childcare places and lack of evidence to suggest current capacity has ability to expand to meet growth ambitions of the plan (e.g. no sites safeguarded for this purpose, not identified on the key diagram and the policy could be more prescriptive about numbers). A notable proportion more concerned about access to nursery places with others referring to adult education too. A number of comments are more focused on facilities associated with schools such as playing pitches, suggesting, for example, a contradictory approach by promising expansion on the one hand and removing existing sites on the other (presumably reference to Hook Road Arena). Negative impact of new schools raised include anti social behaviour and traffic. Some positive aspects of the policy recognised as, for example, UCA helping to sustain the town centre, drawing younger people in and enhancing the economy.</p>	<p>SCC's comments on education suggests no objection to plan on lack of school capacity.</p> <p>Meeting with SCC colleagues held on 21/11/23 and confirmed no further information on early years. Recommended looking at Elmbridge's infrastructure policy for reference.</p> <p>The impact of new development on infrastructure, such as education facilities will be considered under policy S16: Infrastructure Delivery</p>	<p>Now DM21. 3 paragraphs added in preamble including use of facilities for wider community use. Wording of policy remains unchanged.</p> <p>Minor corrective amendment to the establishment name to: University for the Creative Arts</p>
<p>DM15: Open Space, Sport and Recreation</p>	<p>Government bodies and statutory undertakers</p> <p><i>Natural England</i> consider that policy DM15 Open Space, Sport and Recreation is a key dual role (along with policy s17 green infrastructure) in providing open areas to recreate in and play sport but also to allow for safe flooding and will play into flood risk management equally. Sports sites are often dual role locations in that</p>	<p>The Local Plan sets out the approach to Epsom and Ewell's open space, sport and recreation which seeks the enhancement, improvement and increase in access to open space, sport and recreation facilities.</p>	<p>Policy number changed from DM15 to DM19</p> <p>Policy has included clarity on the open space expectation</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p>they will be capable of holding water during heavy rainfall or flooding events and preventing it from having a much greater impact locally.</p> <p><i>Elmbridge Borough Council</i> noted that in Chapter 7 Built and Natural Environment, that there was no reference to local green spaces and wondered about the possibility of allocation of any local green spaces in the borough through the Local Plan process</p> <p>Other organisations/ businesses/groups</p> <p><i>Woodcote Epsom Residents' Association</i> – policy doesn't safeguard existing open space.</p> <p><i>SANF</i> supports and recognise the importance of this policy in the designated area, and as the population grows that access and maintenance to such facilities is not only maintained/improved but increases in line with the number of residents. The lack of such facilities in many urban areas is highlighted by the number of out of area people utilising the limited facilities within our designated area (specifically Auriol Recreation Ground).</p> <p><i>Liberal Democrats</i> - Allotments should be included in the policy.</p> <p><i>Epsom Civic Society</i> – Would like Epsom Football Team back in the Borough.</p> <p><i>Woodland Trust</i> - Policy is silent on natural Green Spaces & Recommends specific changes.</p> <p>Individuals</p> <p>Some comments included concern that proposed development will not be accompanied by proportional increase in these facilities; There was general concern about the loss of open space, particularly at Hook Road Arena; the policy should be more prescriptive in requirements e.g. biodiversity enhancements, age</p>	<p>Open space, sport and recreation provision is provided on a mixture of private as well as public land and the Local Plan cannot require new development to become responsible for the existing funding and access arrangements of existing provision available elsewhere in the borough. However, the Local Plan and future development will be informed by the Open space audit (2024) and the Playing pitch strategy (2021)</p> <p>Whilst development in the borough will need to be considered against the plan as a whole and national policy, the policy expectation for development should adhere to the Fields in trust benchmark standard. This has been provided as a further level of clarity to support provision.</p> <p>The policy protects local green space, aligning with national policy regarding the special protection it affords.</p>	<p>against the Fields in trust benchmark to support the level of provision when development is proposed.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p>ranges, financial contributions. Respondents support of the Council's intention to improve access to open space and opportunity to partake in sport and recreation; the principle of mitigating the loss of sports pitches for residential development through providing replacement sports pitches of a higher quality at more appropriate sites. A number raised about the existing access, condition and lack of maintenance of existing open space, sport and recreation in the borough before development of new ones.</p>		
<p>Policy S18 Transport</p>	<p>Government bodies and statutory undertakers</p> <p><i>Surrey County Council (SCC)</i> support the policy and appreciate the alignment with LTP4. SCC are supportive of the ambition to provide car free development where appropriate and recognise that sites near to existing public and active travel infrastructure are most suitable for this.</p> <p><i>National Highways</i> support the preparation of sound documents which enable the delivery of sustainable development. They consider that development should prioritise active, efficient, and sustainable transport choices. They welcome measures to reduce private car traffic generation in the first instance and the provision of sustainable transport measures. For National Highways, it is measures such as public transport or improved integration of these services that would affect the number of vehicle trips that would otherwise travel on the network. They recognise the continuing need for journeys on the national strategic highway network for both commercial and private purposes.</p> <p><i>Elmbridge Borough Council</i> supports the emphasis on sustainable modes of transport including public transport, walking and cycling. They are interested to understand a Local Plan Transport Assessment and if there were any potential cross boundary impacts for Elmbridge at the A243, Rushett Lane and Fair Oak Lane junction</p> <p><i>Mole Valley District Council</i> – looks forward to further TA work from SCC and interested on impact on A24 Southbound, J9 M25. Should also consider cycling links from Epsom to Ashted and Mole Valley.</p> <p>Other organisations/ businesses/groups</p> <p><i>Transport For London (TFL)</i> asks if EEBC can extend some of the Mayors sustainable transport principles into policy. TFL considers that proposals in the Local Plan will have an impact on road networks in adjoining London boroughs such as Kingston and Sutton, particularly where growth is proposed close to the borough</p>	<p>The policy's focus is towards sustainable transport, this aligns with Surrey County Council's LTP4s framework for transport which has a focus on sustainable modes of transport. Where new development occurs within the borough, SCC, EEBC and developers will support sustainable modes of travel as part of the development.</p> <p>Whilst the Local Plan cannot require new development to fund pre-existing inadequate infrastructure, new development will need the existing transport infrastructure to be considered when determining if new infrastructure will be required.</p> <p>Transport assessments or Plans will consider the impacts of development so that these can be addressed as part of development.</p>	<p>Meetings with Surrey County Council and neighbouring Local authorities have been undertaken in the preparation of the Local Plan . Reference to LCWIP has been integrated into the policy supporting text</p> <p>Policy amendments have been worded with a collaborative approach on consideration of transport issues affecting the borough.</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p>boundaries. Where there are cross boundary transport impacts, developer contributions may be required to provide improved public transport or active travel connectivity or increased capacity.</p> <p><i>Ewell Village RA</i> – would like Epsom included in Zone 6</p> <p><i>Sustainable Epsom and Ewell</i> – LCWIP should com before plan, should included minimum standards for walking and cycling. A;; new dev't should be within 10mins of public transport. 15 min city concept should be supported.</p> <p><i>Woodcote Epsom Residents' Association</i> - IDP is important.</p> <p><i>Laine Theatre Arts</i> - Would like more frequency of train services.</p> <p><i>Liberal Democrats</i> – EEBC doesn't control public transport, affordable public transport is key.</p> <p><i>Epsom Civic Society</i> – LCWIP should com before plan, should included minimum standards for walking and cycling. A;; new dev't should be within 10mins of public transport. 15 min city concept should be supported.</p> <p><i>SANF</i> - Considers council should defend parking standards.</p> <p>Individuals</p> <p>There were a significant number of concerns about the existing condition, quality and provision of the road and pavement infrastructure in the borough are raised as barriers to sustainable travel access. Equally many respondents were concerned about public transport availability, frequency, coverage and cost across the borough and beyond raised as barriers to sustainable travel access. Other concerns included about reduced parking availability in the town centre and levels of traffic on the other hand. A significant number highlighted</p>		

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	the importance of sustainable transport modes but no specific changes suggested. There were some concerns that the policy is “anti-car”		
DM16 Digital Infrastructure and Communications	<p>Government bodies and statutory undertakers</p> <p>N/A</p> <p>Other organisations/ businesses/groups</p> <p><i>The HBF</i> supports the Council's desire for such infrastructure, though raises the issue of policy duplication with Part R of the Building Regulations. This requires all development to be able to have giga bit ready physical infrastructure to enable homes to be connected to FTTP where it is in place. The HBF consider it unnecessary to set this out in local plan policy. Part 1 of DM16 should therefore be deleted.</p> <p><i>Stoneleigh & Auriol Neighbourhood Forum (SANF)</i>: agrees that any infrastructure within the scope of the policy definition can have a detrimental impact on the character and visual and should be placed in appropriate areas to minimise visual impact.</p> <p>Individuals</p> <p>Suggested policy should set target over coverage, suggested thresholds for acceptability (e.g. telecoms masts) should be tightened and suggested some of the policy duplicated part R of building regulations.</p>	<p>Communication equipment is covered within the General permitted development order. The policy approach provides the criteria for planning future digital infrastructure and communications.</p> <p>In order that policy is concise, duplication of other existing legislation has been addressed.</p>	<p>Policy number changed from DM16 to DM23</p> <p>Policy wording which duplicates part R of the building regulations has been removed</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
<p>Other Comments or Sustainability Appraisal</p>	<p>Government bodies and statutory undertakers</p> <p>SCC – Would like policies maps to show SNCI.</p> <p><i>Environment Agency</i> - Include SDGs, Environment Plan, Environmental Improvement Plan, Water Environment Regulations in SA.</p> <p>Other organisations/ businesses/groups</p> <p><i>Ewell Village RA</i> – Housing numbers too high based on Surrey.gov.uk population projections</p> <p><i>Sustainable Epsom and Ewell</i> – Define net zero, require net zero for all (not just GB), improve requirements for greenfield runoff, LCWIPs should be prior to LP.</p> <p><i>Woodcote Epsom Residents’ Association</i> – Supports plan in principle but has reservations about scale of housing based on outdated projections. Objects to any GB release around Langley Vale. Objects to reduction in garden space requirements, would like height policy included.</p> <p><i>Icon Planning and Environmental</i>, representing COU028 Land south of West Cottage, believe it should be allocated and object to it not being included in the plan.</p> <p><i>Sutton and Epsom RFC</i> – object to loss of Priest Fields.</p> <p><i>Lichfields</i> (on behalf of Dandara) – Objects to omission of “Downs Farm” Site and SA does not justify growth scenario it has adopted (i.e. why not growth scenario 5?)</p> <p><i>SARL</i> – continued comments from Ashley Centre/Global House – Support allocation but that redev could yield more homes than stipulated in allocation.</p> <p><i>Liberal Democrats</i> – Commend officers for progressing plan but point to a lack of ambition and aspiration, and clarity on how it will be implemented.</p> <p><i>Woodland Trust</i> – would like to comment on the revision</p> <p><i>Stoneleigh and Auriol Neighbourhood Forum (SANF)</i> – AUR001, AUR0004, ST0004 should not exceed yields specified.</p> <p><i>Epsom Green Belt</i> – Housing would destroy Environment, add pressure to infrastructure and be unsustainable.</p> <p><i>Gatwick airport</i> – referred to Gatwick safeguarding zone relating to Instrument Flight Procedures (IFPs) being extended and will include the Epsom & Ewell Borough area. They refer to buildings/structures over 200m (to</p>		<p>SA has been updated following consultation.</p> <p>Policies maps now show SNCI’s</p> <p>Reference to LCWIPs have been included in the transport policy</p> <p>Net zero policy requirements have been updated</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p>be confirmed) needing to be referred to them for consultation and propose an aerodrome safeguarding policy. They also refer to Epsom and Ewell's position within the 30km wind turbine notification area.</p> <p>Individuals/Organisations</p> <p>On Sustainability Appraisal (S/A) a - A number of respondents are supportive of conclusions of SA. Others less so, suggesting it is too subjective and contains errors. E.g, scoring criteria for sustainability variables, lack of reference to other studies (e.g. Green Belt study), assessment of sites in growth options, and questioning the expertise of its authors.</p> <p>On Habitats Regulation Assessments (HRA) – Some respondents suggested that the ecological significance of Priest Hill had not been considered sufficiently.</p> <p>On Equalities Impact Assessment – does not include mention of any specific consultations with people of protected characteristics.</p> <p>The plan is not neutral towards race or women because people in those groups are less able to afford homes.</p> <p>On HEDNA – it is too long to be considered in the consultation period; its affordable housing calculation (850 for plan period/47 per annum) should be baseline housing number. Points to a discrepancy between the Homeless & Rough Sleeping Strategy 2022-2027 that 50% of homeless are single people, and the HEDNA identifies that 75% of social housing should be 1-2 bedroom homes, though asserts that most social housing should be 1 person.</p> <p>On Land Availability Assessment - Some questioned the robustness of the assessments e.g. broad-brush conclusions of unavailability and unsuitability of brownfield sites, no infrastructure assessment for each,</p> <p>On Viability - A comment suggested it was too weighted towards developer profit.</p> <p>On Green Belt Technical Note – A respondent said that the study doesn't provide justification on whether or not openness can be maintained.</p> <p>Gypsy and Traveler Accommodation Assessment – A respondent suggested that the GTTAA gives insufficient justification as to why Horton Farm had been chosen for Traveller sites.</p> <p>Infrastructure Baseline Assessment – A respondent suggests it confirms infrastructure has been insufficiently planned for.</p> <p>Transport Assessment – Respondents suggested methodology should be refined, e.g. condition of cycle routes, capacity of schools, frequency of train services and busses.</p>		

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p>On Local Plan Process - Some welcomed progress, reflecting on difficulties a lack of local plan has caused. Others pointed to policies needing to be more aspirational.</p> <p>On policies map – Responses included that SNCIs should be shown and Nonsuch Park is in the wrong place.</p> <p>On additional Policies – suggested additional policies include basements, aerodrome safeguarding, Epsom Hospital and Green Space designation.</p>		
Appendix 1 Glossary	<p>Individuals</p> <p><i>Comments from respondents included a need to provide definition for net zero, Specify definition for “active travel,” ‘Flood Zones’ should include consideration of areas of surface water flooding, define ‘protected species ‘Acts’ and ‘Regulations’.</i></p>		<p>The definition for net zero has been updated</p>
Appendix 2 Urban LAA Sites	<p>Other organisations/ businesses/groups</p> <p>Stoneleigh and Auriol Neighbourhood Forum - Sites AUR001, AUR0004, ST0004 should not exceed yield specified in LAA.</p>		<p>LAA has been updated</p>

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p>Individuals</p> <p>A respondent was concerned about the inclusion of AUR001 – Land rear of Rowe Hall. Anoth suggested that STA006 – Kingwood House would unlikely be available for development as it will likely be granted a new 15 year lease in the near future, and objected to its inclusion because the School is a long-standing feature of the local community, highly successful and has no wish to relocate. However the owner is supportive of the site being formally allocated as a mixed educational and residential allocation with an indicative capacity of 30 dwellings. A respondent questioned the location of TOW044 - 107-111 East Street and TOW043 – Corner of Kiln Lane and East Street. In relation to <u>CUD002 – Garages Morland Court</u> respondent were concerned about potential of impact on neighbours. With regards to <u>COL002 – Former Dairy Crest Site</u> this has been confirmed by landowner as not being available for residential but retail. Another suggested it is ideally suited to residential development.</p>		
<p>Appendix 3 Housing Trajectory</p>	<p>Individuals</p> <p>Some respondents were concerned about 12 years of continuous development, that the trajectory delivers excessive housing numbers for the area, and that Greenbelt sites should not be developed.</p>		<p>Housings trajectory amended to reflect latest LAA.</p>
<p>Appendix 4 Guidance on Marketing Requirements for Change of Use</p>	<p>Individuals</p> <p>Some respondents suggested period should be increased from 12 to 18 months minimum , some 24 months. Others suggested only marketing period for DM6 (equestrian and Horseracing) should be increased, (24 months and 36 months as minimums). On suggested that more than one commercial agent should be required to market the property and another that The Council should undertake independent assessments of the viability and not leave it to applicants to prove.</p>		
<p>Appendix 5 Parking Standards</p>	<p>Individuals</p>		

Plan Policy/ Chapter	Main Issues raised	Council Response	Council Action
	<p><u>Parking Standards</u></p> <p>Some respondents suggested that standards encourage people to own more than one car. Some suggested alternative standards, e.g, dev't in town centre should have disabled, car pooling and short term facilities only. Elsewhere a maximum of one space should be allowed, that the maximum for any dwelling should be 2 spaces, not 3 or in some cases that Parking standards should be removed from the Local Plan, in order for improved public transport services to be viable. Others suggested the standards seem about right, it's just how these can be provided. Some have Concern that the standards allow for car free developments, need to plan for people having cars. Others suggest that the standards underestimate the number of parking spaces needed in the borough, including visitor parking and that residential standards should be set as minimums not maximums.</p> <p><u>Electric Vehicle Infrastructure</u></p> <p>A number suggested that Electric vehicle charging infrastructure should be prioritised, especially for dwellings without off street parking (apartments) and concern was expressed as to whether adequate public EV will be provided. Others Considered that 20% EV charge points may be too low and should be increased to meet future needs.</p> <p><u>Size of spaces and garages</u></p> <p>Some respondents suggested that minimum parking space sizes and garage sizes are too small for modern vehicles, others that garage spaces should not count towards the minimum number of parking spaces. Some respondents pointed to the need for off-street parking should be constructed to minimize water run off.</p> <p><u>Cycle parking</u></p> <p>Some respondents considered that cycle parking standards were too low for 2 bed dwellings, there was no consideration of specialist cycle parking such as accessible bikes for the disabled and cargo bikes or electric bike charging. And some expressed concern that cycle parking will not be utilised.</p>		

