



Local Development Framework

Core Strategy Pre-Submission Consultation Statement

June 2006



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PRE-SUBMISSION CONSULTATION STATEMENT (REGULATION 28 STATEMENT) INTRODUCTION

The community and those with an interest in the future of the Borough of Epsom and Ewell have been involved in the preparation of the Core Strategy from the outset. The Council has actively sought to maintain an ongoing dialogue with local groups and organisations to ensure that local issues have been considered in the planning process.

The comments received from the 'Issues and Options' Paper and the results of the initial sustainability appraisal were used to inform the second stage in the preparation of the Core Strategy - the 'Preferred Options'. Again the responses from this statutory consultation, along with the second sustainability appraisal, have been used to feed into the preparation of the submitted version of the Core Strategy. Any comments or suggestions received as a result of discussions with interested parties, outside of the formal consultation periods have also been considered.

The Council's Statement of Community Involvement (SCI) was adopted in April 2006. Although the regulation 25 and regulation 26 consultation was conducted prior to the adoption of this document, the Council has endeavoured to involve the public in accordance with the draft SCI and the procedures identified in the Town and Country Planning (Local Development) (England) Regulations 2004.

Pre-Submission Consultation under Regulation 25: Core Strategy Issues and Options Stage

This statement sets out details of the initial consultation conducted by Epsom & Ewell Borough Council in relation to the development of the Core Strategy at the Issues and Options stage. The consultation was carried out in accordance with regulation 25 of The Town and Country Planning (Local Development) (England) Regulations 2004.

This statement identifies:

- 1) Who were consulted
- 2) The method(s) of consultation
- 3) A summary of the main issues raised in the consultation and how these issues have been addressed

Who were consulted

To inform the early stages of the Core Strategy, we consulted with a number of bodies (listed in Appendix 1), to gather their views on issues that were pertinent to our area. Included in the consultation were the statutory consultees, these being the Regional Planning Body, the Highways Agency, all adjacent Local Planning Authorities, Surrey County Council, and adjoining Parish Councils. There were also many general consultees. The Council has since maintained a consultation database which is updated when requests are made for consultees to be included or removed.

General Consultees included the following groups:

- Residents Associations
- Political Parties
- Local Strategic Partnership Members
- Local Conservation Associations
- Developers active locally
- Schools / Colleges
- The general public and other identified stakeholders

Methods of consultation

For this consultation, the Council produced an Issues & Options paper, highlighting various issues that affect the Borough with the aim of encouraging debate and providing the opportunity for stakeholders to give opinions. Consultees were invited by letter to comment on the paper, also being encouraged to express any wider views they may have. The consultation period ran for 6 weeks from 3 June to 15 July 2005. The Issues & Options paper and associated questionnaire were additionally made available on the Council's website, at the Town Hall and at libraries throughout the Borough, and was publicised at various locations.

An initial sustainability appraisal supported this document, demonstrating the Council's commitment to making sustainability an important part of the development of the Local Development Framework from the earliest possible stage.

Additionally, an Open Evening was held in the Town Hall on 16th July 2005 to inform residents and other interested parties about the Local Development Framework, providing details and information on the current documents, particularly the development of the Core Strategy. The event was publicised in the local Guardian newspaper and on the Council's website, and letters of invitation were sent to the stakeholders included in the consultation database (refer to Appendix 1). Notices were displayed on numerous public notice boards throughout the Borough. Copies of the Issues & Options paper, its sustainability appraisal and surveys were made available.

Comments were received from 44 consultees, with 42 making specific comments. These comments were used to inform the preparation of the subsequent 'Preferred Options' document.

Main issues arising from the consultation and how they were addressed:

As set out in the Issues and Options consultation paper, the main issues are organised under the following themes:

Sustainability

A number of respondents requested to see the issue of sustainability as an overarching principle. In response to this the Council set out sustainability in the introduction as an overarching theme for the Preferred Options paper. Also commented upon was the importance of recognising that sustainability relates to environmental, social and economic issues. Consequently, as an overarching principle, sustainability was incorporated into all sections of the document. Additionally the Council cross checked the preferred options against the aims set out in the Government's 1999 Sustainable Development Strategy to ensure all aspects of sustainability were covered.

Comments were received stressing the importance that Council policies are supported by National and Regional guidance. Consequently, each objective in the Preferred Options document contains a 'Policy Context' section.

Within the Issues & Options paper the 'environment' was dealt with under the Sustainability chapter. Many consultees suggested the 'environment' should have a separate chapter as it was felt to be an important topic, covering numerous issues. A Natural Environment chapter was therefore included in the Preferred Options document encompassing many of the consultees' suggestions.

The issue of infrastructure drew a number of comments, with concerns that development should be co-ordinated with the infrastructure it demands. In response Objective 21 was introduced which specifically deals with infrastructure issues. Requests were also made relating to the environmental standards of new developments and consequently Objective 17 was introduced to address these issues.

Green Belt

Many respondents supported the option of retaining the Green Belt and its boundaries while others called for the Council to consider amending these. In response the Council addressed these issues under Objective 9 and its associated alternative option. Concerns were raised that any development in the Green Belt should be minimal, strictly controlled and of an exceptional standard. Again this was incorporated into Objective 9.

Housing

Affordable housing was recognised to be an important issue within the Borough with many consultees offering opinions as to the levels that should be specified. Objective 3 in the Preferred Options paper assessed the level of affordable housing provision, with the Council taking consultees comments on board and justifying its reasons for selecting the preferred option. Again opinions on residential densities were varied and these were dealt with in a similar fashion with alternatives being considered and suggestions being made to limit any potential negative impacts.

Consultees felt it was important that the size and type of dwellings provided are suitable for needs. Objective 5 in the Preferred Options paper relates to this, also being informed by the Borough's 2004 Housing Needs Survey.

Many respondents objected to the use of open space (parks & large gardens for example) for housing and stated a preference for the use of previously developed land. This was incorporated into the document with previously developed land being the identified as the first choice for development. Numerous consultees wished to highlight the requirement that new development should respect the quality of the Borough's built and natural environment. The Urban Design & Built Environment and the Natural Environment chapters of the Preferred Options document serve to protect and enhance the quality of these.

Travel

Support was strong for prioritising sustainable modes of travel, which is reflected in Objective 19. Comments were also received which suggested locating development in areas with good travel links, thus reducing the need to travel. The Preferred Options document aimed to focus development on previously developed land the majority of which is sustainability located.

Many comments were made on the issue of car parking with the general consensus being that standards should be realistic and not less than Government proposed limits.

Employment

Respondents recognised the importance of retaining employment land to meet the needs of the economy. The preferred option for Objective 6 supported this, aiming to maintain a suitable mix of employment premises to provide for both existing and future requirements. Locating employment land in areas with excellent transport links was also considered important as was encouraging mixed use developments. Objective 22 encouraged a suitable mix of uses within the Town Centre which is a sustainable location.

Community / Retail / Cultural Facilities

Respondents were keen to promote the retention of existing facilities, especially those catering for the young and elderly. This has been reflected in Objective 24.

A number of more detailed comments received were felt to be more applicable to future Development Plan Documents. These comments will be kept on file and considered when these documents are produced.

A table containing a more detailed summary of responses from the consultation and how they were addressed in the Preferred Options document is located in Appendix 2.

Pre-Submission Public Participation under Regulation 26: Core Strategy Preferred Options Stage

This statement sets out details of the consultation conducted by Epsom & Ewell Borough Council in relation to the development of the Core Strategy at the 'Preferred Options' stage. This consultation was carried out in accordance with regulation 26 of The Town and Country Planning (Local Development) (England) Regulations 2004.

This statement contains the following information:

- 1) Who were consulted and the number of representations made
- 2) A summary of the main issues raised and how they have been addressed in the submission version of the Core Strategy
- 3) A table containing a more detailed summary of responses from the consultation and how they have been addressed in the submitted Core Strategy

Who were consulted and the number of representations made

On 17 January 2006, the Council wrote to over 250 'stakeholders' to invite their comments on the Preferred Options document. These stakeholders comprised the statutory consultees (Specific Consultation Bodies as identified in Annex E, PPS12) along with Government departments/agencies, national/regional organisations, service/utility providers, a wide range of community/interest groups, a variety of local organisations and residents together with anyone else who had requested to be added onto the Council's consultation database. The formal consultation period ran from 17 January – 28 February 2006 (6 weeks).

Consultees were sent a copy of the 'Preferred Options' document and an associated questionnaire (a copy of the questionnaire can be found in Appendix 3). The questionnaire requested respondents to indicate their preference for the various options identified by the Council while also providing space for additional comments. The covering letter informed consultees that the sustainability appraisal for the 'Preferred Options' was available on the Council's website, at the Town Hall and the Borough's libraries. Hard copies were available on request. All the consultation documents for the regulation 26 stage were made available for inspection at those places mentioned above. In addition the consultation was publicised through a notice in the local Guardian newspaper, on the Borough's notice boards and on the Council's website.

Of the 251 forms mailed out, a total of 55 responses were received, which equates to a return rate of 22%. The vast majority of respondents made specific comments. Thirty chose to complete the questionnaire, while a number commented generally or on specific options. A small number responded out of courtesy, not making any detailed comments. All responses were recorded, considered and acted upon if deemed relevant as part of the preparation of the final version of the Core Strategy, submitted to the Secretary of State in July 2006.

Responses were received from the following organisations / individuals:

Specific Consultees:

South East England Regional Assembly (SEERA)
Thames Water
Royal Borough of Kingston Upon Thames
Highways Agency
Surrey County Council
English Heritage
Environment Agency
English Nature

Government Department:

Government Office for the South East (GOSE)

National / Regional Organisations:

Disability Rights Commission
British Waterways

Tourism South East
Commission for Architecture and the Built Environment (CABE)
The Theatres Trust
Home Builders Federation
Sport England
Countryside Agency
Campaign for Real Ale (CAMRA)

Local Groups:

Ewell Grove School
Epsom Primary School
St Joseph's Catholic School
Ewell Village Residents Association
Epsom and Ewell's History and Archaeology Society (two individual responses)
Epsom Protection Society
Mole Valley and Epsom Green Party
Surrey Wildlife Trust
Stamford Ward Residents Association
Age Concern Epsom and Ewell
Ewell Downs Residents Association
East Surrey Badger Protection Society
College Ward Residents Association
Environment Forum
Town Ward Residents Association
Woodcote Residents Association
Local Committee for Epsom and Ewell

General:

Local MP
5 responses from residents
Lambert Smith Hampton (on behalf of the National Offender Management Service)
Barton Wilmore Partnership (on behalf of the Racecourse Holding Trust)
Tree Officer (Epsom and Ewell)
RPS (on behalf of Fairview Homes Ltd)
Elmbridge Borough Council
Waverley Borough Council
Atkins (on behalf of Mr R. Shafter)
GVA Grimley (on behalf of English Partnerships)
John Sharkey & Co (on behalf of the University College for the Creative Arts)
Mono Consultants (on behalf of the Mobile Operators Association)
King Sturge (on behalf of Helical Bar Plc)
Member, Surrey County Council
The Planning Bureau Limited (on behalf of McCarthy and Stone)

The respondents can be broken down into the following groups:

Groups	Number of Responses	% of Total
Specific Consultees	8	15
Government Departments	1	2
National/regional agencies and organisations	9	16
Local Groups and Bodies	18	33
General Public / other interested parties	19	34
Total	55	100

It can be seen that a most of the groups were represented in the responses, with local groups & bodies and the general public & other interested parties providing over half of the feedback.

A summary of the main issues raised and how they have been addressed in the submission version of the Core Strategy

This section assesses the comments received as a result of the statutory 6 week consultation period. Firstly the results from the questionnaire are interpreted, followed by a brief summary of the main issues raised and comments as to how these have been addressed.

As not all respondents chose to complete the questionnaire, the statistics provided from this method are not representative of all opinions received and therefore should be read in conjunction with the other comments. It should also be noted that many organisations only commented on those options that were of interest to them, resulting in some options receiving more 'votes' than others.

Survey Statistics (using data from the questionnaire responses)

Respondents were provided with a questionnaire which asked them to indicate their level of agreement/disagreement with the preferred and alternative options. Of those respondents who indicated an opinion on the preferred options, on average 91% agreed or strongly agreed with these options, while 5% disagreed or strongly disagreed. For the alternative options, of those who marked a preference, 24% agreed or strongly agreed, while 63% disagreed or strongly disagreed. A more detailed breakdown of the survey statistics can be found in Appendix 4.

Issue	Preferred / Alternative Options (number of options in brackets)	% Strongly Agree / Agree	% Disagree / Strongly Disagree
Housing	Preferred Options (5)	83	12
	Alternative Options (5)	24	69
Employment	Preferred Options (3)	86	5
	Alternative Options (2)	18	69
Natural Environment	Preferred Options (5)	93	2
	Alternative Option (1)	28	68
Urban Design and the Built Environment	Preferred Options (5)	96	0
	Alternative Option (1)	48	32
Transport and Infrastructure	Preferred Options (3)	84	9
Town Centre and other Local Shopping Centres	Preferred Options (2)	95	0
	Alternative Option (1)	10	81
Community, Recreational and Cultural Facilities	Preferred Options (2)	87	6
	Alternative Options (2)	26	41

General Comments on the Core Strategy Preferred Options

A number of general comments were received, many which were positive towards the document. There were also some suggestions.

- Support was generally given to the preferred options and it was suggested that some options should be given priority over others.
- The document was criticised for not containing specific policy wording as it was considered that this reduced the number of opportunities for stakeholders to comment on.
- It was suggested that the Key Diagram be improved to contain more detail for the submission version.
- A recommendation was made that the spatial nature of the Core Strategy document be explained, as should the role of Surrey County Council.

The final version of the Core Strategy was adapted accordingly. As indicated by the level of support, the 'preferred options' were taken through to the final version and developed into specifically worded policies. The Key Diagram has been enhanced, and further explanation added to the document as to the spatial nature of the Core Strategy and the County Council's role.

A number of comments suggested specific issues that respondents felt should be covered within the Core Strategy. These included; promoting tourism, provision for future prison requirements, consideration of higher education facilities, a telecommunications policy and the contribution of public houses to the community. Where appropriate these comments were reflected in the final document although a number were felt to be more suited to subsequent Development Plan Documents (DPDs) and will therefore be considered during the preparation of these.

A volume of suggestions related to the detail of specific wording, which has now been adapted.

Few comments related to the sustainability appraisal, although it was suggested that the objectives be updated to reflect the Government's 'Securing the Future' document which was produced in March 2005. Since the 'Preferred Options' document was appraised, the sustainability scoping report has been subject to review and now incorporates the objectives from the 'Securing the Future' document. The proposed changes are currently being considered by the statutory consultees and will be adopted following their approval.

Comments Relating to Specific Objectives

Housing

The housing section received the greatest volume of comments.

With regard to the amount of land identified, support was broadly given for the identification of sufficient land to provide for the Borough's South East Plan housing target allocation. However, a number of respondents felt that a lesser amount should be identified or allocation should be 'as and when required' (due to windfalls and environmental constraints), while others felt a greater amount should be provided for (due to possible increases in future reviews of the strategic plan). It was noted that currently the South East Plan figures are not mentioned and that provision should be made until at least 2017 with consideration also being given to the period beyond.

The submission version of the Core Strategy now states that provision will be made for housing development over the period to 2022 in accordance with the figures provided in the South East Plan (Policy CS 9). There is a commitment to reviewing this position, particularly once the South East Plan has finally been approved.

Development on previously developed land (PDL) was supported although there were a number of concessions suggested. It was suggested that PDL should include the reuse of buildings and 'major developed sites' within the Green Belt, especially as a large volume of the Borough's housing has been, and will be, derived from the hospital cluster sites. Restrictions should be made to the release of PDL located in the flood plain. Some considered the volume of PDL insufficient to satisfy the housing requirement, so urban extensions may be required. There were many who disagreed and were concerned this would be contrary to the South East Plan, Surrey Structure Plan and other environmental protection policies.

The submitted Core Strategy now has the objective of focussing development within the built up areas, particularly previously developed land, including the reuse of conversion of existing buildings (Policy CS 10). The three remaining 'hospital cluster' sites within the Green Belt have been identified as of strategic importance for the delivery of housing. The Council is satisfied that the Borough can accommodate development requirements within the built up areas.

A mixture of support was given to the preferred option relating to affordable housing and it was considered an important but difficult issue. The general consensus was that there was a need to increase the level of provision. However, care should be taken to ensure policies are based on robust evidence and are flexible for individual developments to help ensure site development viability. There was a concern that the levels intended were not specified and that too much affordable housing may change the character of the Borough.

The Council has confirmed its objective to ensure that at least 35% of all new housing completions in the Borough are affordable. The Council has opted to lower the threshold where affordable housing would be required, to increase the amount of provision. However, policy CS 11 requires a lower percentage from smaller sites compared to larger sites, to help ensure more sites contribute, while remaining viable. Further details will be set out in a Supplementary Planning Document (SPD). The design policy CS 7 within the Core Strategy reflects the concerns relating to affordable housing and high density building and will help ensure that developments positively contribute to the built environment.

Increasing densities in the town centre and at other sustainable locations was welcomed by many although there were exceptions. This option was seen as helping to protect the Green Belt and maximising land use efficiency. It was felt that not all locations were suitable for high densities and good design would play an important role. Some considered high density living to be unhealthy, although it was acknowledged that it may result in the more efficient use of resources.

In the submission document, higher densities are to be directed to central, more sustainable locations, which will enable relatively lower densities (in line with draft PPS3) to be applied to other areas to help retain their character and local distinctiveness (Policy CS 10). Good design is seen as an essential requirement in all future developments.

With regard to the size and types of dwellings, it was felt that developers should be encouraged to deliver housing that is suitable for local needs, especially taking into account the needs of the ageing population. However, there were concerns that the preferred option would inhibit the ability of developers to respond to the market and may result in the production of dwellings that the market does not demand.

In Policy CS 11 the Council has continued to require that new housing developments should provide a mix of dwelling types and sizes to help meet the identified housing needs and this forms an important component of developing and sustaining mixed communities

It was noted that the needs of gypsy and traveller groups had not been specifically referred to. There is now a dedicated chapter and policy (CS 12) to provide for the needs of these groups.

Employment

There was recognition of the need to regulate losses of employment land in an attempt to balance the provision of homes and jobs. Some felt that a flexible approach should be adopted; blanket protection should be avoided and sites should receive a level of protection according to their individual attributes. The re-use of employment land was seen as helping to safeguard the Green Belt and support was given for mixed use developments on those sites that retain an element of employment use. It was suggested that some employment centres are in need of revitalisation.

These comments were considered when developing the employment provision policy in the submitted Core Strategy. The resulting policy CS 13 is flexible, allowing for some losses of employment land, while protecting those sites in the most sustainable locations. The modernisation of existing sites is supported.

The importance of maintaining an up-to-date Employment Land Review study was highlighted, with a clear definition of employment uses. Specific sites should also be mentioned such as the Nonsuch Business Park, which has been identified in the Surrey Waste Plan as a potential site for accommodating waste. These comments were noted and the document has been amended accordingly.

Support was given for homeworking due to the perceived benefits of reduced travel congestion. However it was suggested that evidence for the demand for live-work units needs to be provided. The submitted Core Strategy contains a commitment to

supporting 'smart growth', including homeworking; further policy detail will be provided in subsequent DPDs.

Natural Environment

There was strong support for the Natural Environment preferred options, although it was commented that the section did not adequately promote the landscape quality of the Borough, especially within the urban areas. The quality and importance of the landscape has been given greater emphasis in the Open Space and Landscape Character section, and is also promoted in the Built Environment section.

Many were in favour of protecting the Green Belt with the preferred option receiving plenty of support. However, there were some suggestions that allowances should be made for selected releases to provide for sustainable housing development and that certain areas, such as the race course and hospital cluster, should be designated as 'major developed sites'. This would allow for any future refurbishments or potential extensions of these areas over the lifetime of the Core Strategy. It was suggested that policies should allow for the required infrastructure for recreational use of the Green Belt.

Policy CS 2 in the submitted Core Strategy ensures that the general extent of the Green Belt will be maintained. Further detailed policies are to be included in later DPDs to control development within the Green Belt, while its extent and the designation of any 'major developed sites' will be dealt with in the Site Allocations DPD. It was felt that as the Borough's housing allocation could be accommodated within the built up areas for the foreseeable future, there was no requirement for Green Belt releases.

With regard to the protection and management of open spaces, the preferred option was generally supported although concerns were raised relating to planning obligations. It was suggested that contributions should be assessed on a case by case basis and that they must be relevant, necessary and directly related to the development in planning terms. Any policies developed in relation to open space should be based on proven need. Some felt that new development can help to enhance the condition of the environment and that the provision of open space can help attenuate storm water run off. The creation of a Supplementary Planning Document relating to new open space following PPG17 guidelines was recommended.

The Core Strategy aims to maintain a suitable level of provision of open space and the Council will seek to address any shortfall in provision in line with the information contained in the Open Space audit. A new policy CS 15 has been introduced, which relates to developer contributions towards open space, sport and outdoor recreation. Further details will be set out in an SPD.

With regard to the protection of areas of nature conservation interest, there was concern over conflict between recreational uses and nature conservation. However, the preferred option was strongly supported. It was suggested that clarification be made to distinguish between the designations and that ancient woodlands also be included.

The Core Strategy now clearly distinguishes between the different designations of protected areas, and ancient woodlands are included. Policy CS 3 ensures that any

development which may harm these areas will be avoided, with the level of protection an area receives being in accordance with its level of importance.

There was a general appreciation that climate change will increase the flood risk and therefore measures should be taken to reduce / mitigate this and protect the floodplain. The inclusion of a buffer zone around rivers and discouraging the paving of front gardens were suggestions.

This preferred option has been incorporated into Policy CS 8 relating to sustainability in new developments. Additional information has been incorporated into the pre-amble, while an SPD will provide further detail.

Biodiversity was also considered important and some respondents were encouraged by the aim to integrate biodiversity into developments through S106 agreements. Biodiversity on brownfield sites, ecological surveys and the development of a local Biodiversity Action Plan were also considered important.

The protection and enhancement of biodiversity is provided for in the submitted Core Strategy through a dedicated policy, CS 5.

Urban Design and the Built Environment

The majority of the preferred options in this section were unanimously supported. There was recognition of the need to protect Epsom's heritage and retain the historical character. The majority of comments related to the incorporation of sustainable elements into new developments. This was accepted as a positive option, with many championing high sustainability standards and zero carbon developments. However, there were many concerns regarding how the policy would be delivered. A number stated that by making sustainability requirements mandatory, additional costs would be passed on to developers making some schemes unviable. Again, it was felt that sites should be considered on a case by case basis and that the design of a scheme will play an essential role.

The Core Strategy contains policies to protect and enhance the historic and built environment, while also striving to increase the sustainability of new developments Policies CS 6 - 8. Sustainability is a key theme throughout the Core Strategy, as demonstrated by the new overarching Policy CS 1. The Council is committed to reduce the impact of development on the environment and this policy therefore applies to all new developments. Further details will be provided in an SPD where the issue of development viability will be carefully considered.

Transport and Infrastructure

The preferred options were supported and it was felt that alternative forms of transport, such as walking and cycling, and the use of public transport should be encouraged. Many respondents felt the car was here to stay and that reducing traffic congestion should be an objective in itself. Parking was considered a main issue which needs to be addressed, as should the provision of cycle paths. Travel plans received support as did improving highway safety generally, although it was questioned as to how the planning process can contribute towards this.

Transport and travel is now an independent policy within the Core Strategy (Policy CS 19) which has been developed to reflect the comments received. The Council is committed to supporting the objectives of the second Surrey Local Transport Plan,

one of which is to tackle congestion and reduce delays. The Core Strategy policy seeks to ensure that new development proposals promote alternative forms of transport and do not increase traffic problems.

Substantial support was given for infrastructure being provided alongside associated development, and it was highlighted by some that the provision must be required by the development. All types of infrastructure need to be considered and the cumulative impacts of smaller developments were regarded as important, both in terms of transport and infrastructure.

Policy CS 14 is a new policy relating to developer contributions to community infrastructure. This covers a range of infrastructure and will ensure that the service and community infrastructure necessary to serve a development is available or will be provided for. Further detail will be set out in an SPD.

Town Centre and other Local Shopping Centres

Maintaining the mix of uses in Epsom Town Centre and safeguarding it as an important retail centre was supported. One respondent commented that growth should be actively planned for, based on an assessment the need for new floorspace for retail, leisure and other main town centre uses. There was a suggestion to increase the residential capacity of the town centre, and concern about the number of hot food 'takeaways'. An approach which safeguards local centres was supported and it was suggested that policies should provide a framework for new local centres to come forward where there is an identified need.

The Core Strategy Policy CS 17 sets out key objectives for the Town Centre and is committed to creating a diverse balance of uses. An Area Action Plan for the Town Centre is planned, which will be informed by a retail capacity study. The Council will resist proposals that undermine the retail function of local centres and will consider the need for the establishment of new local centres. Ewell village centre has been highlighted as an area that is particularly in need of support to encourage its revitalisation.

Community, Recreational and Cultural Facilities

There was a general appreciation that more should be done for young people to help discourage anti social behaviour. Additionally it was felt that both the young and old have limited access to facilities and therefore, where possible, these should be provided within a short distance of homes. Currently no reference is made to higher education establishments which are also community facilities. Operational requirements of facilities also need to be taken into account and it should be recognised that maximising use may not always be popular with local residents.

Policy CS 16 resists losses of community facilities, particularly those catering for the young and old, unless it can be clearly demonstrated there is no longer a need for such a facility. The importance of the Borough's educational establishments has now been highlighted as has the accessibility of facilities.

A table containing a more detailed summary of responses from the consultation and how they have been addressed in the submitted Core Strategy is located in Appendix 5.

Appendix 1: List of Consultees

General & Statutory Contacts

Age Concern	DPDS Consulting
Atkins	EDF Energy
BAA Heathrow	Elmbridge Borough Council
Barton Willmore Planning	English Heritage
British Gas plc (North Thames)	English Nature
British Geological Survey	English Partnerships
BT Group plc	Environment Agency
British Wind Energy Association	Equal Opportunities Commission
Broadway Malyan	Fairview New Homes Ltd
Business Link for Surrey Ltd	Federation of Small Businesses
Commission for Architecture and the Built Environment (CABE)	Forestry Commission England
Cable and Wireless	Freight Transport Association
Campaign for Real Ale (CAMRA)	Friends of the Earth
Church Commissioners	Greater London Authority
Civil Aviation Authority	Greenpeace UK
Coal Authority	Groundwork South East
Commission for Racial Equality	Guildford Borough Council
Confederation of British Industry	GVA Grimley
Council for the Protection of Rural England (CPRE)	Headley Parish Council
Department for Culture, Media and Sport	Health and Safety Executive
Department for Education & Skills	Heathrow Airport Ltd
Department for Health	Help the Aged
Department for Trade and Industry	Highways Agency
Department for Transport	HM Prison Service Headquarters
Department for Work and Pensions	Home Office
Department of Constitutional Affairs	House Builders Federation
DevPlan UK	Housing Corporation
Dialogue	Institute of Directors
Diocese Board of Finance	Institute of Logistics and Transport
Disability Rights Commission	John Sharkey & Co
Disabled Persons Transport Advisory Committee	Jones Day
DP9	King Sturge

Lambert Smith Hampton	Sport England South East
Learning and Skills Council	Strategic Rail Authority
Learning and Skills Council - Surrey	Surrey Ambulance Service NHS Trust
Levvel	Surrey and Sussex Health Authority
London Borough of Sutton	Surrey and Sussex Strategic Health Authority
London United Busways	Surrey Business Enterprise Agency
Malcolm Judd & Partners	Surrey Chamber of Commerce
Ministry of Defence	Surrey Community Development Trust
Mole Valley District Council	Surrey County Council
Mobile Operators Association	Surrey Economic Partnership
Nathaniel Lichfield & Partners	Surrey Education Business Partnership
National Grid	Surrey Fire and Rescue Service
National Playing Fields	Surrey Heath Borough Council
Network Rail	Surrey Playing Fields Association
NTL	Surrey Police
O2 Ltd	Sutton and East Surrey Water Services
Office of Government Commerce	T Mobile (UK)
Orange	Tandridge District Council
Peacock and Smith	Telewest Communications plc
Rail Freight Group	Tetlow King Planning
Rapleys LLP	Thames Water
Reigate and Banstead Borough Council	The Countryside Agency
Road Haulage Association	The Crown Estate
Royal Borough of Kingston-upon-Thames	The Development Planning Partnership
Runnymede Borough Council	The Gypsy Council
Rushmon New Homes	The Planning Bureau Limited
South East England Development Agency (SEEDA)	The RSPB
South East England Regional Assembly (SEERA)	The Theatres Trust
South East Regional Housing Board	Transport for London
South West Trains Ltd	Traveller Law Reform Coalition
Southern Electric	Tourism South East
Southern Gas Networks	Virgin Mobile
Southern Railway	Vodafone Corporate Communications
Spelthorne District Council	Waverley Borough Council

Westbury Homes
West Waddy ADP
Woking Borough Council

Women's National Commission
WWF UK

Local Contacts

Ashley Shopping Centre
Auriol County Junior School
Bellway Homes (Planning Manager)
Blenheim High School
The Lintons Centre
CDC 2020 Plc
Central Surrey Council for Voluntary
Service
Churches Together
Citizens Advice Bureau
Clarendon Park Residents Association
College Ward Residents Association
Connexions
County Councillor
Council for the Protection of Rural
England (CPRE) Surrey
Cuddington County Primary School
Cuddington Croft County Primary School
Cuddington Residents Association
Danetree County Junior School
Downsend School - Epsom Lodge
East Elmbridge & Mid Surrey Primary
Care Trust
East Surrey Badger Protection Society
Environment Forum
Epsom & Ewell Access Group
Epsom & Ewell Conservative Party
Epsom & Ewell History & Archaeology
Society
Epsom & Ewell Islamic Society
Epsom & Ewell Labour Party
Epsom & Ewell Liberal Democrats
Epsom & St Helier Hospitals Trust

Epsom and Ewell High School
Epsom Coaches
Epsom College
Epsom Primary School
Epsom Protection Society
Ewell Castle School
Ewell Court Residents Association
Ewell Downs Residents Association
Ewell Grove County Infant School
Ewell Village Residents Association
Gleeson Homes
Glyn School
Green Party
Howell Hill Residents Association
Job Centre Plus
Kingswood House School
Langley Vale Village Association
Linden Bridge School and The Spring
Centre
Malcolm Scott Consultants Ltd
(representing RAC Club)
Malcolm Judd & Partners
McCarthy & Stone
National Trust
North East Surrey College of Technology
(NESCOT)
Nonsuch High School for Girls
Nonsuch Park & District Residents
Association
North Surrey Division
Parkridge Developments
Persimmon Homes
Racecourse Holdings Trust

Ramblers' Association
Riverview County Primary School
Rosebery Housing Association
Rosebery School
Royal Automobile Club
Ruskin Homes Ltd
Sparrow Farm Community Junior School
St Christopher's School
St Clement's RC Aided Primary School
St Joseph's Catholic Primary School
St Martin's CE Junior School
Stamford Green County Primary School
Stamford Green Residents Association
Stamford Ward Residents Association
Stamford Ward Residents Association
Stoneleigh First School
Stoneleigh & Auriol Residents Association
Surrey Chambers of Commerce
University College for the Creative Arts at
Farnham
Surrey and Borders Partnership NHS
Trust
Surrey Social Services
Surrey Wildlife Trust
Surrey Youth Offending Team
The Mead County Infant School
Thurley Associates
Town Ward (Epsom) Residents
Association
Try Homes
Vale Primary School
Valuing People Group
Wallace Fields County Junior School
Wallace Fields First School
West Ewell & Ruxley Residents
Association
West Ewell County Infant School
White Young Green*

Woodcote (Epsom) Residents Society
Woodcote Residents Association

Interested Parties

Mrs Blake
Mr Barker
Mr Bellinger
Mr Cottrell
Councillor Frost
Mr Gee
Mr Grayling MP
Ms Hughes
Mrs Joyce
Mr Martin
Mr Patton
Mrs & Mrs Pettifer
Mr Taylor
Mr Tyler
Mr Bentall
Mr Joyce

Appendix 2: Detailed summary of responses from the Issues and Options consultation and how they were addressed in the Preferred Options document

Source of Comment	Summary of Comment	Council's Response
South East England Development Agency	Important to retain employment sites in the Borough. Balance the number of residents and the number of jobs. Where possible aim to increase the number of residents who work in the Borough.	Noted. This was dealt with in the Employment section
Elmbridge Borough Council	No specific comments	
South East England Regional Assembly	Ensure preferred options stage is prepared with reference to RPG9 (the current RSS) and the emerging South East Plan policies and the London Fringe sub-regional strategy.	Reference was made to influencing policies in the 'Policy Context' section under each option
Thames Water	Development should be co-ordinated with the infrastructure it demands. Considering the PPS 12 infrastructure comments, Thames Water support option 4. Increases in population place strain on water resources . Important to increase water efficiency, develop new sources, protect of river quality and ensure the sewerage treatment infrastructure can cope. New development should allow for sustainable provision of water and timely investment in sewage treatment & discharge systems. Thames Water advise OFWAT of the funding required to accommodate growth and require a 3-5 year lead in time for the provision of extra capacity (may be 5-10 years if completely new systems are needed).	Met through Objectives 21 (infrastructure) and 17 (sustainable development principles to maximise energy efficiency and limit waste)
Thames Water	For the LDF to meet the Soundness tests it is essential the Core Strategy includes the following policy / sub policy: PROPOSED POLICY - WATER AND SEWERAGE INFRASTRUCTURE CAPACITY: Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:1) sufficient capacity already exists or 2) extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected. When there is a capacity problem and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to the occupation of the development.	Met through Objective 21. Policy wording will be developed at the submission stage.
Thames Water	PROPOSED NEW POLICY SUPPORTING TEXT: The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by Thames Water, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development.	Met through Objective 21. Policy wording will be developed at the submission stage.

Thames Water	Sewage and water treatment works by their nature are frequently located on the periphery of urban areas or in rural locations away from developed or residential areas and fall within tracts of land identified as Green Belt. Therefore it will be inevitable that some of the new utilities facilities infrastructure to support new development will need to be located in the Green Belt where existing facilities exist. This must be recognised in the Core Strategy - a policy which allows essential utilities development in the Green Belt.	Noted
Highways Agency	Agency's interest relates specifically to motorways & trunk roads - nearest to EEBC is the M25. Therefore only have general comments to make. Support options which: 1) locate development at sustainable sites with good access to public transport 2) give greater priority to public transport, walking and cycling facilities 3) reduce reliance on the car and promote alternative forms of transport.	The supported options were incorporated into the Transport section, as well as general location objectives in Housing, Employment and Town Centre sections
Highways Agency	PPG13 promotes sustainable transport choices while reducing the need to travel. The options in section d) have less emphasis on reducing the need to travel so this strand of policy could be strengthened.	Noted
Surrey County Council	Option 1) New development should be required to incorporate energy efficiency measures and utilise sustainable construction, as set out in Structure Plan Policies SE2 & SE4. (Current wording of option 1 is misleading - costs may initially be higher but in terms of sustainability, the benefits will accrue over the lifetime of the development. Capital costs should not be identified as an issue in isolation). New development should be required to achieve a certain 'Ecohomes' or 'BREEAM' rating very good. Policies could require a minimum proportion of energy demand to be generated from on-site renewable resources and for SUDS to be included as part of all developments. Developments over a certain threshold could be required to include a sustainability statement, possibly as part of a design statement. Option 3) This option should be more specific, stating what is meant by 'environmental resources'. Policies should also be included to encourage conservation of the historic environment. Option 4) Policies should encourage water resource conservation and measures to control runoff including the use of SUDS. Option 5) New development should make maximum use of PDL and buildings in urban areas, in accordance with Structure Plan Policies LO1 & LO2. In areas with good public transport, the LDF should encourage new development to be of a higher density.	Noted. Comments partly met through Objective 17. A sustainability statement requirement will be added to Development Control policies DPD. Other comments were met through Objectives 14 (historic environment), 2 (maximise previously developed land), 4 (densities) and 17 (sustainable development principles in construction)
Surrey County Council	Should be an option that considers amending the Green Belt boundary to meet general development needs (if only to be rejected in favour of concentration on urban areas). The LDF should encourage the enhancement of the landscape and the need for more positive use of land in the Green Belt for access and recreation. There is a need to address land management issues in the rural/urban fringe.	Covered in Natural Environment Objective 9

Surrey County Council	<p>There should be third issue identified as to the size and type of housing required to meet needs. New housing should contribute towards meeting known and predicted local housing needs. In particular, in addition to affordable housing the need for smaller accommodation to meet the needs of 1 and 2 person households, for key worker housing (ideally defined in relation to the local economy and market) and for housing suitable for younger disabled people and the elderly should be addressed. Given the projected significant increases in the very elderly, there will be implications for the provision of alternative housing options to meet their needs (and also affordable housing for social and health care workers). Extra Care Housing can cater for this. The Government is due to publish guidance on assessing gypsy and traveller housing need .This will enable the Council to assess the scale of need and make provision accordingly. Consideration should be given to the need for a requirement for new housing to be built to 'Lifetime Homes' standards. Also essential that the LDF has in place a mechanism to deliver the necessary infrastructure to support all new housing development, taking into account the Infrastructure Good Practice Guide. Option 1) New housing development should have regard to the higher densities required by Government and to the requirements of the Structure Plan for higher densities in Town centres. Emphasis on making best use of PDL however, density should be determined by the overall design and layout of the scheme, with reference to the character of the surrounding areas and infrastructure implications. Emphasis should be on delivering high quality residential environments, which can generate higher density. Option 2) Emphasis on location should be on the use of PDL and buildings within the urban area. This could include the redevelopment of employment sites , land in existing residential use, some infill and mixed use, particularly in and around town centres. Infill will need to be carefully controlled to ensure no adverse impact on the character of areas and that it doesn't result in overloading of infrastructure. There should be no provision for development on urban open space which is valued by the local community, in line with Structure Plan Policy LO2. Options 3&4) Support the provision of affordable housing at 40%, providing it is justified by the Local Housing Needs Survey. The LDF should consider the scope to reduce thresholds below the 15 dwellings / 0.5ha threshold, where this can be justified by need and the economics of development on a site. This would accord with policy DN11 in the Structure Plan & the provisions of draft PPG3. Option 5) Sheltered housing development should not be exempt from an affordable contribution. As with other residential development, the presumption should be in favour of onsite provision. Where this cannot be delivered, a commuted sum could be sought. The LDF should seek contributions from commercial development, particularly where such a development can be seen to have an impact on the local demand for housing.</p>	<p>The size and type of housing required comment has been addressed in Objective 5, including homes for the elderly. Objective 4 addressed densities, Objective 16 - development that complements the character of the area, Objective 21 - infrastructure, Objective 3 - affordable housing, Objective 2 - use of PDL. Gypsy and traveller housing needs will be addressed in the Core Strategy and Site Allocations DPD</p>
Surrey County Council	<p>All of the options proposed are supported, but they should be considered to be an interrelated package of measures with the sustainability option to concentrate development in areas with good access to public transport and on previously developed land. Any transport policies and proposals should take into account the provisions of the Structure Plan, the Surrey Local Transport Plan and work in preparation on the LTP2. Also have regard to the Surrey Design Guide, the Infrastructure Good Practice Guide and the Parking Strategy for Surrey. A provisional version of LTP2 is due out in July with the final version expected in March next year. This is broadly similar to those in the existing LTP, but with greater emphasis on tackling congestion, improving air quality and accessibility. Important that these objectives are reflected in the Core Strategy. There is no reference to safety and security for all transport users in the Travel section. This is an important factor.</p>	<p>Noted. Highway safety was dealt with in Objective 20.</p>

Surrey County Council	The issues and options in this section are confusing. The LDF needs to ensure that sufficient employment land is retained/available to meet the needs of the economy and that any change of use to housing will not prejudice future economic prosperity. Redevelopment of suitably located existing commercial sites at accessible locations should continue to contribute to new office and other commercial development, but there may be scope to promote more sustainable growth by encouraging mixed use redevelopment at accessible locations. There also needs to be an emphasis on smart economic growth and initiatives to change behaviour such as flexible working and company travel plans.	Employment was given has its own dedicated section, with clear objectives.
Surrey County Council	LDF should promote the retention of existing facilities, where a continuing need can be demonstrated, but allow for new and replacement /improved facilities, required as a result of new housing development or to improve service provision and general quality of life in the Borough. The Borough should consider the need for facilitates jointly with service providers, including the County Council. Surrey CC is seeking to deliver its services more effectively including libraries & drop in centres for young people. There is a growing need for childcare for children aged 0-14 (16 for those with special needs) ,SCC is looking to develop a number of Children's Centres in the Borough between now & March 2008. In accordance with SSP policy LO2, the LDF should retain existing public open space and recreational provision in urban areas. Where possible, additional open space should be sought as part of new residential and other development. It is important for the LDF to put in place a mechanism to help secure developer contributions to deliver the necessary services and facilities required to support all new housing development. The LDF should seek contributions towards the cost of new community/recreational and cultural facilities where new development creates additional demand.	Objective 24 related to the protection and improvement of community facilities and the protection of open spaces were dealt with in Objective 10.
Surrey County Council	The Structure Plan identifies Epsom as a major commercial, retail and leisure centre. The LDF should set out a detailed vision for the Town Centre that looks to support its economic, retail and leisure base and to increase the diversity of retail, leisure, commercial & residential activities to best serve the local catchment population having regard to the emerging South East Plan and the relationship with the metropolitan centres in London. Concentrating development in and around town centres is consistent with national and structure plan polices. Higher density residential development & mixed use development that provides both housing and employment opportunities should be encouraged. PPS6 advises local authorities to develop a positive approach to strengthen local centres and planning for local shops and services that involves & retailers to ensure equality of access to local shopping & other facilities that serve people's day to day needs.	Noted. Objective 22 sought to maintain and encourage a suitable mix of uses in Epsom Town Centre

Surrey County Council	Quality of design of new developments is crucial as is a need to encompass sustainable construction. Design statements should be a prerequisite of all development. The installation of fire sprinklers in new developments and also in the conversion of existing premises should be encouraged in DC & design guides. In relation to waste collection & recycling regimes, there may be opportunities to reduce arson through design. The LDF should recognise the importance of the historic environment as part of the quality of life and therefore have conservation policies to protect it where appropriate.	The quality of design was a feature throughout the Urban Design and the Built Environment sections. There was a particular focus on incorporating sustainability features into new build.
Environment Agency	The EA supports the inclusion of an overall Issue relating to Sustainability but are extremely concerned that the Core Strategy does not include an Issue relating to either the Environment or Flood Risk. At the moment the environment is located as a series of sub-objectives scattered through the paper which does not ensure the highest standard of protection and enhancement of local biodiversity. If the environment and flooding are not to be covered as distinct topics within the Core Strategy then the EA seeks reassurance that they will be covered in other LDF documents and wish for confirmation of this. Additionally climate change has not been addressed as the highest priority in tackling water shortages, flooding and environmental degradation. It is essential we both limit and adapt to climate change, and inappropriate development can exacerbate the problems associated with flood risk and limited water supply.	Introduction set out how sustainability is the overarching factor for all sections and objectives. A new chapter on the Natural Environment was introduced and a flood risk objective added.
Environment Agency	Development and Flood Risk The risk of flooding is a material planning consideration that should be considered by planning authorities, developers and the construction industry for a wide range of locations and development types, and not merely in obvious floodplain areas. Less widely appreciated is the possibility that the development of a particular site may increase the risk of flooding elsewhere. PPG 25 sets out the national guidance. An issue should be included in accordance with this: 'Flood risk should be considered at all stages of planning and development process in order to reduce future damage to property and loss of life'. PPG25 outlines how flood risk issues should be addressed in regional planning guidance, development plans and in the consideration of planning applications. Also states: LPA's should therefore consider the information available on the nature of flood risk and its potential consequences and accord it appropriate weight in the preparation of development plans and in determining applications. An issue should therefore be included to be worded as follows: To adopt a risk based approach to development in flood risk areas and promote sustainable surface water drainage. The following options should be included: (i) to consider potential flood risk on a catchment wide basis, at all stages of the planning and development process in order to reduce risk to human health and safety and reduce future damage to property. (ii) To apply precautionary approach, recognising that flood risk is likely to increase as a result of climate change and to have an expectation that flood risk is likely to increase as a result of climate change. (iii) Ensure floodplains are used for natural purposes, functioning efficiently and protected from inappropriate development. (iv) Within the area liable to flood, development will not normally be permitted for new residential or non-residential development, unless it can be demonstrated to the satisfaction of the Environment Agency and the LA that the proposal would not, itself or cumulatively with other development: impede the flow of water or, reduce the capacity of the flood plain to store water or, increase the number of people or properties at risk from flooding.	Reducing flood risk was covered in Objective 12. These comments were considered further when drafting policy wording at the submission stage

Environment Agency	<p>Environment : Request the inclusion of an Issue relating to the environment. The following options should be addressed: (i) Development & Flood Risk (as mentioned above) (ii) Sustainable Drainage Systems, this is in accordance with PPG2 and would utilise sustainable drainage systems to control surface water runoff in order to protect ground water quality and reduce the risk of flooding. (iii) Land contamination and remediation: making the best use of brownfield sites will help protect green spaces and improve the wider environment. The EA seeks to ensure that new development proceeds where it does not : adversely affect river corridors and the natural water environment or, pose an unacceptable risk of contamination to air, land and ground and surface waters or, require additional water resources beyond those available for industrial and public supply. The following option should be included: 'Ensuring contaminated land is identified and that the effects are minimised and remediated.' This is in accordance with PPS 1. (iv) Groundwater protection and pollution prevention: The policy point should include the following - 'improve water quality avoiding activities that pollute waterways' & 'ensuring adequate water resources and infrastructure is available in new developments. (v) Sustainable construction and design: Policy point should contain 'ensuring quality built environments where development/redevelopment takes place and maximising use of land.' This is in accordance with PPS1. (vi) Policy to Protect the environment (pg 3 Option 2): Policy point should be amended to ensure the highest standard of protection and enhancement of local biodiversity. (vii) Air Quality: The EA plays a central role in protecting air quality and holds data on permitted emissions from certain processes that may or may not be operating within the Town Centre boundary. (viii) Waste: The principles of the waste hierarchy should be put into practice in all new development during the construction phase and throughout the life of the development. Building & landscape designs should incorporate space and facilities for the collection and separation of waste on site in order to facilitate recycling. Core Strategy should also indicate the need to contact the EA to check requirements in accordance with current waste management for storage and transfer of waste.</p>	<p>A Natural Environment section was introduced. i) met through Objective 12 (flood risk) ii) Objective 17 iii) was a consideration for Objective 2 iv) was covered by the saved Local Plan policies DC3 and DC4 v) Objective 17 vi) Objective 13 vii) covered in saved policy DC4 viii) to be covered in Development Control policies DPD. Also covered in PPS 10.</p>
Environment Agency	<p>Pleased that in accordance with PPS1 this aims to achieve environmental protection and enhancement as well as economic and social improvements. However, this issue should be firmly committed to achieving sustainability as well as minimising the impact of development on the environment. Words such as 'demonstrate' and 'encourage' do not provide an acceptable level of protection for the environment.</p>	<p>Noted</p>
Environment Agency	<p>Request that this issue focuses on environmentally sustainable planning and design to ensure new development adopts the highest standards of sustainable construction in accordance with PPS1. The issue should include the following: To ensure all new development respects the distinctive quality of Epsom's built and natural environment to be achieved through principles that incorporate: sustainable construction and design, pollution prevention and remediation, groundwater protection, and protection and enhancement of local biodiversity. Options should include the following: Retention of ecologically important features; Naturalisation of waterways and open spaces to be encouraged; The provision of a semi-natural buffer strip alongside any new development that lies close to a watercourse (buffer zone).</p>	<p>Met through Objective 17 - sustainable construction and Objective 13 - protecting and enhancing biodiversity</p>

Environment Agency	Strongly agree that other modes of travel other than car usage should be promoted. Walking, cycling and public transport should be highlighted as the preferred modes of travel. The need to travel should be minimised with the promotion of employment, cultural & leisure facilities within the Borough.	Noted. These issues were dealt with in Objectives 19, 24 & 25
Environment Agency	Request that this issue promotes the following: (i) Promotes recreation associated with water, including access to water and associated land (ii) Promotes and extend facilities on navigations for which it has responsibility (iii) Actively seek an increase in access to water and associated land for all users (iv) Actively seek an increase in the quantity and quality of access arrangements and agreements for all water and waterside users.	Noted
Countryside Agency	1) The Countryside 2) The Countryside in and around towns 3) The environment - greenspace and biodiversity	Covered in the Natural Environment section
Countryside Agency	Consider 'whole life' costs for resource efficient developments. Consider how new development can use modern methods of construction but also be locally distinctive.	Noted. Mentioned in the Urban Design and Built Environment chapter
Countryside Agency	Any development in the Green Belt should be of an exceptional standard in terms of design and resource efficiency.	Only necessary if Green Belt development is permitted in principle
Countryside Agency	Consider using Landscape Character Assessment to ensure new development sits well in the form of the landscape & respects the character of the countryside. Conduct biodiversity and access audit of brownfield land.	Noted. Requirement within Development Control policies DPD for specific locations
Countryside Agency	Public transport should link well to green spaces and recreational opportunities as well as housing, jobs and shops.	
Countryside Agency	Is there a Town Design Statement?	
Countryside Agency	Use tools like Landscape Character Assessment, Village and Town Design Statements and concept statements to promote high quality & locally distinctive new development.	
English Nature	Protected Habitats and Natura 2000 Policy Requirements: Government target that 95% of SSSI's will be in favourable (or unfavourable recovering) by 2010. The LPA must have regard to this legislation in the production of all their LDF policies. In particular the housing allocation and DC strategies must ensure they include policies which are compatible with the requirements of their Section 28G duty (Countryside and Rights of Way Act 2000 - protecting and enhancing flora and fauna in SSSIs).	Objective 11 dealt with this. Management of and improvements to SSSIs are dealt with by other Council departments

English Nature	<p>Protected Species Policy Requirements: Planning policies and framework must take account of the habitat requirements of protected species as well as applying the legislation at the planning application stage. Protected species could be considered simply at the strategic planning level by having an overarching policy to ensure protected species are given due consideration in the DC system. In DC, a specific policy which sends out a checklist to all potential planning applicants with simple criteria identifying when a protected species survey is likely to be required prior to an application. A policy should be instated that the planning documents will not be accepted without a correct survey if one is identified on the planning checklist. Section 106 should not be used to meet the need for surveys which should be carried out before the application is submitted. English Nature will be making advice sheets for use by LAs available shortly.</p>	A checklist can be produced as part of the Development Control policies DPD
English Nature	<p>Objectives and Indicators - Biodiversity: Would welcome the inclusion of objectives to conserve and enhance biodiversity within the plan area, supported by relevant and useful biodiversity indicators.</p>	Objective 13 related to biodiversity. English Nature were also consulted on the Scoping Report indicators which included ones on biodiversity.
English Nature	<p>Baseline Data & Monitoring SSSIs & BAP Targets: Surrey Biological Records Centre is a good central source of biodiversity data. Council can download SSSI condition from the English Nature website. Every site is assessed at least once every 6 years. Info on national trends on populations of wild birds can be obtained from the British Trust of Ornithology.</p>	Noted
English Nature	<p>Accessible Natural Greenspace & Biodiversity Action Plans: English Nature would expect to see inclusion of clear policies that ensure the following: (i) No loss or damage to designated sites (ii) No loss or damage of Ancient Woodland (iii) No loss of water quality to river catchments (iv) Where protected species are likely to be present (e.g. brownfield sites, barn conversions) appropriate protected species survey to be carried out and submitted with the planning application. If protected species are present, English Nature should be consulted. (v) No loss of hedgerows. Furthermore opportunity should be sought within new development schemes to enhance the condition of designated sites, ancient woodland, BAP habitat & habitat that supports BAP species and the water quality of river catchments</p>	Natural Environment objectives covered the first two points (i&ii), while point iii was considered in the policy wording in the submission document. Point iv will be dealt with by the Development Control DPD. Point v was covered by Objective 11 where opportunities will be sought to enhance such areas.

English Nature	Ancient Woodland: Accurate info on the Ancient Woodland resource is an essential component of the baseline data to determine what currently exists and how policies in the LDF contribute to sustainable development.	Ancient Woodlands are protected by policy and are managed and maintained by other departments of the Council
English Nature	Wood fuel / Renewable Energy Policy: A policy promoting wood fuel sourced from local woodlands would help fulfil renewable energy responsibilities as well as ensure the continued management of the woodlands that adds to EEBC's landscape character & biodiversity resource.	Objective 17 encouraged the use of various types of renewable energy sources. Wood fuel could be investigated along with those listed.
English Nature	Veteran Trees: EEBC has an unusually high Veteran Tree resource. It is essential that all Veteran Trees in the Borough are adequately mapped and all owners of land with Veteran Trees are educated to ensure there are no inappropriate tree works undertaken.	Trees with Protection Orders (TPOs) are mapped and will be made available to the wider public on the Council's GIS based system in due course.
The Theatres Trust	Theatre buildings provide a venue for creative and cultural activities. The Council should have ideally undertaken a cultural strategy for the area that specifically identifies theatrical use as part of it. The Core Strategy should include policies identifying and encouraging cultural provision and have policies protecting existing cultural assets, drawing from the cultural strategy. See advice note (comments in Core Strategy file) for specific DC policies.	Objective 24 dealt with this point. Also covered by saved policy OSR9
Home Builders Federation	The Council can best achieve its objectives by working with developers and house builders to achieve mutually agreeable outcomes rather than imposing hard and fast requirements. As all sites and all developments are different hence planning policy should be formulated in such a way that recognises these differences. Policy should be clear that developers know what is expected of them but sufficiently flexible to take into account unique site specific and market considerations. The solutions which can achieve sustainability and biodiversity gains will need to be tailored in recognition of the specific conditions as they prevail at the time a planning application is being considered. On the provision of infrastructure, development should be required to provide only the infrastructure made necessary by the development itself. However, the Council should take great care not to seek to impose excessive demands as this may be counter productive if it deters development. Anything which prevents identified needs being met is not a sustainable way forward.	Noted. The Site Allocations DPD and a Housing Delivery Action Plan will be developed in liaison with developers, providing more certainty to all parties concerned.

Home Builders Federation	As affordability is a real issue for EEBC, one way of addressing this is to increase the supply of housing overall. This not only addresses housing need and demand in itself but a percentage target of a larger number provides a greater benefit than the same percentage target of a smaller number. It may therefore be reasonable for the Council to argue for more housing in the consultation on the SE Plan in order to address the affordability issue and this may well necessitate the development of greenfield sites and the Green Belt. The development industry is arguing there needs to be a review of Green Belt boundaries to meet housing requirements. This may well have knock on effects on local reviews of the Green Belt boundaries through the LDF processes. This should be factored into the preparation of the Core Strategy at this stage and into the sustainability assessment (not just the negative sustainability effects of developing what was previously undeveloped land).	Not accepted - unsuitable in many other ways and not in accordance with the Surrey Structure Plan and Regional Spatial Strategy policies
Home Builders Federation	The Council must undertake the necessary research in order to ensure that the policies it pursues are sound. This means carrying out a detailed assessment of urban capacity alongside robust assessments of housing need and the demand for housing overall through a local housing market assessment. If after conducting these it materialises that the Council is not providing sufficient housing to meet identified demands, then it cannot expect to provide sufficient affordable housing to meet housing need. The issue of affordable housing is inextricably linked to that of the provision of housing overall and this should be better reflected in the Core Strategy than it is in the issues paper at present. At the very least the Core Strategy will need to look beyond 2016 in order to comply with the requirement of PPG3 that LDFs make sufficient provision for housing for a period of at least 10 years after the anticipated date of adoption of the LDF. While the HBF would support those in the commercial sector being required to make provision for their own workers in terms of the provision of affordable housing, there can be no justification for lowering the site thresholds for residential development until the Council has carried out a local housing market assessment.	Noted. The Core Strategy looks to 2022. the Council has undertaken a Housing Needs Assessment.
Sport England	Advocate the need for a positive and robust approach towards sport/recreation facility provision in the Core Strategy. Sport England's Land Use Planning Policy Statement (LUPPS) 'Planning Policies for Sport' (Nov 1999) provides guidance on the issues that should be addressed in local plans. This statement is currently being reviewed to reflect the changes in the planning system and LPAs will be notified when this is available. In the interim, the current LUPPS document should continue to be used for guidance. One of the issues that should be addressed in these documents is providing sport/recreation facilities through new development. It is important these are made in conjunction with new communities. To assist local authorities to successfully secure such provision, Sport England has published a good practice guide 'Providing for Sport and Recreation through New Housing Development' (2001). Sport England would support the preparation of an SPD related to and including sport recreation and have guidance which would be useful for assisting in the production of this.	Noted.

The British Wind Energy Association	As stated in PPS22, LDDs should contain policies designed to promote and encourage, rather than restrict, the development of renewable energy resources. BWEA believes the LDF should briefly outline the different renewable energy technologies, and equally encourage and promote all forms of renewable energy. BWEA considers that an 'Area of Search' type of policy for renewables is not necessary if clear, robust criteria based policy is implemented. This takes pressure away from areas that would otherwise be identified and allows other feasible schemes that will contribute to renewable energy target to come forward. It is important that the LDF presents a positive, objective and robust approach to renewable energy, rather than a restrictive policy. The criteria to be considered for renewable energy developments within the LDF could fall under three main headings: (i) Residential Amenity - includes many common issues that arise through renewable energy developments (ii) Environmental Effects - covered by the EIA (iii) Landscape Effects. BWEA also emphasises the contribution that small renewable systems can make, and urges the Council to consider a policy for the mandatory requirement of onsite renewables for all new buildings and renovations to provide electricity for at least 10% of the building's needs.	Covered by Objective 17 with further detail to be provided in Development Control policies DPD and Supplementary Planning Document.
Network Rail	Emphasising the use of planning obligations for protection and enhancement of public transport infrastructure: Network Rail is not in a position to provide enhanced capacity or improved specifications without the benefit of third party funding. It is therefore essential that other sources of funding are obtained, including the use of planning obligations from surrounding developments wherever possible, if it can be demonstrated that such schemes will result in increased passenger demand or unacceptable safety of efficiency issues. EEBC should consider establishing a list or 'Project Bank' of schemes or services that could be funded by planning obligations from appropriate developments. This would aid potential applicant's negotiations with the Council regarding likely S106 implications for their schemes. Transport infrastructure & interchange improvements should be included in such a list. Area-based pooling of funds should also be employed so that part-contributions can be obtained from a wider range of developments and other sources, when it may not be possible to obtain the necessary funds from any single party.	Noted. A Developers Contributions SPD will be produced in 2006/07
Network Rail	Review of defined settlement boundaries; policy towards redevelopment or brownfield sites; affordable housing: Where land is no longer required for operational railway use there is often potential for redevelopment, including housing or mixed use schemes. The LDF process provides an opportunity to review LPA policies on redevelopment of brownfield land and the positioning of defined settlement boundaries. Up to date information to include in such a review should consider the following: (i) Assessment of current housing priorities, at national, regional and sub-regional level (ii) Housing provision shortfall (iii) Sustainability of sites under consideration (iv) Realistic assessments of demand & supply of existing & potential/proposed uses. EEBC should note the following a) Affordable housing is only one of a number of calls on planning gain, in addition to requirements such as transport improvements and infrastructure etc b) Sites may require exceptional costs to be taken forward for housing, such as decontamination, access constraints etc. This may reduce the level of Affordable Housing possible if a scheme is to remain viable. c) Not all developments will be eligible for Social Housing Grant d) If landowners are not confident that they can achieve a certain value for a site they may not develop at all in the hope that conditions change at a later stage or may develop a non residential scheme instead.	Noted. Network Rail will be consulted on Site Allocation DPD to put forward any suitable landholdings for development

Network Rail	Station Car Parking: People are more likely to use the national rail network if they are able to leave their cars at the station in a safe, secure environment and continue their remaining journeys by train. This is preferable to completing the whole journey by car and the Council also needs to recognise that commuting is an important part of people's lives. Station car parking plays an important role in securing national and local sustainable transport objectives.. Railway car parking should not be subjected to the stringent and inflexible policies often adopted for commercial development schemes where the objective is to reduce the amount of car borne traffic.	Noted. Car parking standards will be reviewed as part of the LDF preparation
Nonsuch Watch	Warmly support the option of planning for biodiversity. Would like to see the strategy include a strong emphasis on quality of life as it relates to the enjoyment of nature. This not only applies to the Green Belt but to the open spaces within the built up areas, which are often oases of peacefulness and beauty for residents. The pressure for development must not be allowed to take away or diminish in quality these precious green spaces, even the small areas which may support important wildlife. Request all such sites to be investigated for their ecology and local amenity value before development upon them is considered.	New chapter on the Natural Environment was incorporated into the Preferred Options
Epsom & Ewell History & Archaeology Society	Other issues to be included: The protection of the historic environment (in view of the large number of historic buildings in Epsom & Ewell). Also, Archaeology. There should be a commitment to ensure that the recommendations of PPG16 are fully implemented when planning applications are dealt with.	Met through Objectives 14 & 15
Ewell Village Residents' Association	Suggest that the 'Issues Box' should contain a third 'stanza' on the lines of: 'is there sufficient infrastructure to support it?'. This would then match the phrasing in the list on Page 2	Noted
Ewell Village Residents' Association	Suggest the addition of the words 'including the ancient village of Ewell and the 1930 centre at Stoneleigh', at the end of Para 3 on pg 9, would properly emphasize the importance of these two local centres.	Noted. There is an objective to protect local centres (which would include Ewell Village and Stoneleigh)
Stamford Ward Residents Association	The SWRA would like to see over the next ten years: a) Protection of pleasant residential environment b) Raising of residential densities in existing areas in very limited circumstances only c) Protection of the Green Belt d) Protection of Epsom Common e) Flourishing town centre; restriction of new out town shopping f) Convenient local shopping g) Reduction in congestion h) Reduction in travel by car to school i) Promotion of walking, cycling and public transport; consideration of the extension of the Chessington railway line into West Park j) Lower speed limits outside schools	The first 9 points have been incorporated into the Preferred Options. Extension of the Chessington railway has been dismissed by the Railway Authorities. Speed restrictions are a highway issue

Stamford Ward Residents Association	Add consideration of water run-off/flooding problems	Met through Objective 12
Stamford Ward Residents Association	Car parking standards should be realistic	Noted
Mole Valley Green Party	Cancel Option 2	Not necessarily appropriate
Mole Valley Green Party	Agree with options 1, 4 & 5. Also part of option 2 - Vacant or under utilised office premises. Do not agree with option 3 or part of 2 - Keep open spaces & preserve the character of Epsom	Noted
Mole Valley Green Party	Agree with options 1, 2 & 3a	
Mole Valley Green Party	Option 2 - the Council should promote youth facilities. Option 4 - Ease restrictions and charges	Objective 24 seeks to protect and enhance community facilities with a particular focus on those catering for the young and old
Mole Valley Green Party	Stop further supermarket development e.g. in Upper High Street	
Mole Valley Green Party	Agree with options 1 & 3. Disagree with option 2.	Noted
	There should be a specific topic on climate change prevention with the following options: 1) Restore local facilities such as Post Offices 2) Promote car sharing, renewable energy 3) Congestion charge - particularly for heavy goods lorries & 4x4's	Sustainability has been set out in the introduction as the overarching theme of the Core Strategy
East Surrey Badger Protection Society	Agree with Option 1. As for Option 2, the example of race horse training facilities is a very specific exception, limited to one part of the Borough and has already been accommodated once such a provision was allowed in. All sorts of other exceptions could be argued for by way of special pleading.	Noted
East Surrey Badger Protection Society	Agree with options 1, 3, 4 & 5 and some of 2. However, deplore the thought of including infill sites - the partial development of large gardens as an option. This is a pressure to be resisted at all costs. Suggesting it as an example suggests a weakness that greedy householders and developers would jump to exploit.	Noted
East Surrey Badger Protection Society	All of the options are reasonable points for consideration. Disappointed that still more takeaways would be suggested as preferable to shop units remaining vacant, unless there is to be a radical change in the attitude of Surrey Police to the problems the existing takeaways cause.	Noted

West Ewell & Ruxley Residents' Association	Agree with the points but very concerned about higher densities and new technology. Use of brownfield sites is acceptable but only if consideration is given to nearby dwellings which allows space to live. Serious consideration must be given to the phase new technology; this has been used many years ago in London and other cities which has resulted in increases in crime and anti-social behaviour.	Noted
West Ewell & Ruxley Residents' Association	Whilst boundaries must be fully protected there may be very small areas of land designated as Green Belt but play no part in containing the spread of urban built up areas; these may be considered for development. Support the use of Green Belt land for the location of race horse training but with clear guidelines in respect of its use for this purpose. Concerned about the phrase 'some users cannot operate within the urban area'.	Noted. Regarding the phrase 'some users cannot operate within the urban area', the policy surrounding this will be detailed.
West Ewell & Ruxley Residents' Association	Believe the Borough's target of about 200 dwellings is about right and any increase should be resisted - although there is a considerable amount of green land there is also high housing density. This is not a growth area and there will be no major development by industry. Also believe 40% affordable housing on all sites is unrealistic due to cost; suggest 25-40%. Cannot support high density building.	Noted
West Ewell & Ruxley Residents' Association	Has to be realism - people will not give up their cars and more car parking spaces should be allowed. The unrealistic limits for dwellings results in more on street parking. Provision of walking and more cycle ways are unnecessary; you cannot go shopping or to a party on a bike. The solution is a substantial increase in bus services to shops, stations etc with links to long distance travel. This will be costly but effective.	The location of new development is an important factor for transport options. This is to be focused on previously developed areas which are likely to have better public transport links
West Ewell & Ruxley Residents' Association	In the main Epsom is well served with these services. With an aging population, perhaps one or two additional day centres may be required with good transport between homes and centres. More must be done to retain Epsom hospital. Council should take a greater interest in secondary schools and resist the development of their playing fields, to safeguard them for future generations.	Noted

West Ewell & Ruxley Residents' Association	Agree with the exception of option 5. Too many takeaways/restaurants will be detrimental to retail shops which are badly needed.	Noted. There is an objective to protect local centres
West Ewell & Ruxley Residents' Association	Agree, providing any development is in keeping with the character of Epsom & Ewell	Noted. Carried forward in objective 16
CPRE Surrey - Epsom & Ewell District	Found that the 'options' were in the majority of cases, not really options but sensible suggestions for policies to support the stated issue. They were generally not mutually exclusive. Have decided to comment in terms of the important issues which need to be raised in production of further Development Plan Documents.	Noted
CPRE Surrey - Epsom & Ewell District	Seems to be a mish mash. Prefer to see sustainability given a narrower definition, excluding topics such as utilities. Would like to see the issue of light pollution added to the types of pollution that damage the character and vitality of our local area. The issue should be re-worded to state: 'How can the Council make development more economically, socially and environmentally sustainable?'. Option 1&2 Support. Option 3 - the term 'environmental resources' is very vague. Should be expanded to explain that it includes water, timber, use of local building materials & encouragement of buildings with the lowest embodied energy in their construction. Should also include reducing waste generation and the need for waste disposal.	Sustainability has been set out in the introduction as the overarching theme. With regard to light pollution, this will be included in the policy wording or in a future SPD. Objective 17 encompasses all sustainable construction elements including features that will remain sustainable during the lifetime of the development (demonstrated by the requirement for a very high BREEAM rating). This will be more specifically worded in the submission version, or an SPD.

CPRE Surrey - Epsom & Ewell District	Support strongly the retention of the Green Belt. Do not feel the wording of the Issue is correct. It should read 'How can the Green Belt be best protected and enhanced'. Support Option 1) - Do not wish to obstruct the racing industry from small, necessary improvements of their premises, but would not support loss of Green Belt for new racehorse training facilities. Option 2) Must be opposed as it opens the gate to a range of possible forms of development.	Noted. Wording was altered in the Preferred Options document
CPRE Surrey - Epsom & Ewell District	Option 2 is a question and therefore the same as the first issue. Oppose the concept of new housing being built in open spaces (wording in option 2). Also concerned about the development of large gardens as this has a negative impact on the more leafy areas of the Borough and the setting for older buildings. Support options 1, 3, 4 & (almost identical) 5. There should be a mention under the housing section, the need for high environmental standards for building and for the buildings in use. These should include energy efficiency and resource efficiency as in the sustainability section.	Noted. Objective 17 requires high environmental standards in new developments
CPRE Surrey - Epsom & Ewell District	Suggest the wording of the first option be changed to: 'What can the Council do to improve accessibility to necessary infrastructure, without use of the car, within the Borough?' Support the three options but do not agree with option 3b), suggesting the provision of fewer parking spaces than the government's maximum limits. Though desirable in principle, levels of car ownership mean such policies remain unworkable while our travel habits remain as they are now.	Noted. There is now an objective which seeks to encourage non-motorised forms of travel
CPRE Surrey - Epsom & Ewell District	Option 5 could open the door to a lot of development in the Green Belt, which CPRE would oppose.	Noted
CPRE Surrey - Epsom & Ewell District	Unhappy about the reference in the 2nd bullet point to 'if necessary, on the edge of town'. It does not clarify whether this is on already developed land (as in the Upper High Street) or on open spaces. Would oppose such development in open spaces. There is no reference to the limitations placed on the development of Epsom by the traffic congestion, which is already at high levels. Further concentration of the town centre, runs the danger of worsening this. Support the encouragement of local centres to reduce the pressure on the town centre, while providing facilities close enough to people's homes to allow non-car travel.	Noted. The objectives in the preferred options document were carefully worded and reflected many of these statements
CPRE Surrey - Epsom & Ewell District	Note there is little mention of Open Space in the document, In contrast to the old local plan. Suggest the addition of a separate category in the Core Strategy, to cover green spaces. Have discussed this with the Epsom & Ewell Environment Forum, and are in agreement this is a significant omission of the current document. Issues would be: 'How can the Borough best safeguard the extent and quality of our open spaces?'. 'What needs to be done to protect both public access and enjoyment, while also conserving natural habitats and biodiversity?'	Noted. The Natural Environment chapter was introduced. The Site Allocation DPD and Proposals Map will state specific policies on open space and identify actual

		sites.
The Environment Forum	Would like to see the issue of sustainability as an overarching principle, stated as such in a preamble to the document, and underpinning the thinking for all the categories within the Core Strategy. Sustainability is so wide, covering environmental, social & economic aspects, and cannot always be covered under one heading. Would like to see environmental sustainability given its own separate category. Currently only one issue under sustainability - believe there should be others. Think the first question should be rephrased to say 'How can the Council make residential and commercial development more socially, economically and environmentally sustainable?'	This approach was adopted in the preferred options document
The Environment Forum	Energy: As climate change is of such importance, would like to see an Issue to focus exclusively on that. Could be worded 'How will maximum energy efficiency for all new buildings be achieved?'. Very much support the implementation of policies to encourage energy efficient developments. These should include solar water heating, passive solar gain, photo-voltics and use of local biomass where possible. Believe there should be policies to increase the energy efficiency of building & when the building is in use. Increase the use of materials derived locally & use only timber from certified FSC sources. As the concept of the 'ecological footprint' is now well known an issue incorporating this concept could be worded - 'How can the overall ecological footprint of the Borough, especially of new development, be minimised?'. The issue of waste and recycling also needs to be mentioned.	Dealt with in Objective 17
The Environment Forum	Open Spaces: open spaces are barely mentioned. The needs to be a separate section to cover green spaces which is separate from the Green Belt. The issue would be - 'How can the open spaces of the Borough be maintained and improved to protect habitats and to provide recreation space for residents?'	Noted. Natural Environment section added.
The Environment Forum	Biodiversity: This needs to be listed as a separate topic as it currently only has a small mention. The issue should be - 'How can biodiversity best be protected and enhanced within the Borough?'	Met through Objective 13
The Environment Forum	Strongly support the retention of Green Belt & are against its use for development. Would support only small increases in existing horse racing establishments.	Noted

The Environment Forum	Would like to see the need for energy efficiency, high environmental building standards, high resource efficiency standards etc...for all building, as stated in the sustainability section. Agree that at least 40% of new housing should be affordable and that housing should be concentrated close to existing facilities and infrastructure. Do not agree that Epsom should continue to build more and more market accommodation. Already have a dense Borough and should not be aiming to exceed SSP targets. Meeting targets is not a justification for building on green spaces or for developing large gardens. Support the use of brownfield sites and oppose the development of school playing fields.	Objective 17 required high environmental standards. Other comments - noted.
The Environment Forum	Support measures to reduce car use & the need to travel. Another issue could be - 'How can all new development be sited to avoid car use, and encourage walking, cycling or use of public transport?'	Noted. Development is to be focused on previously developed land (PDL) which is likely to have better existing transport links
The Environment Forum	Incorporate the need to reduce the need to travel	As above, development on pdl is more likely to be near existing facilities
The Environment Forum	Currently no mention of the importance of peace and quiet, of open spaces and access to natural areas of biodiversity, or of access to recreation space. Clean air, dark skies at night, quiet residential streets, sense of local identity, and pride of community are not mentioned. An objective should be everyone's access to areas of green space, as under PPG17. Issue would be - 'What measures can be taken to ensure the maintenance of green spaces, and a pleasant leafy environment within the built areas?'	The Natural Environment section sought to provide an appropriate level of open space, protection to areas of nature conservation and aimed to improve the Borough's biodiversity
Epsom & Ewell History & Archaeology Society	The care of the archaeological remains, as Epsom Town Centre and other local centres emerge. That the scheduled and historic buildings in these be maintained and not demolished.	Met through Objective 15
	More local buses for local people.	
	Ensure the centres restore a sense of community rather than shopping areas only.	
	Under Community / Recreational / Cultural: Cultural should be spelled out and defined, perhaps - Library, arts, museum and other cultural facilities	
Epsom Protection Society	'Quality of Life' is an overarching concept that includes a range of topics as described in the first paragraph of section H, i.e. community. recreational/cultural facilities in addition to urban renaissance and the built environment. It therefore seem inappropriate to use 'Quality of Life' to refer only to the latter two features. Would be preferable to head section h 'Urban Design and the Built Environment'. The first paragraph could then describe that these topics are additional features of the quality of life.	Noted. Topics were separated amongst the Preferred Options

Epsom Protection Society	Do not agree with the relaxation of Green Belt boundaries and Option 2 is therefore not acceptable to us. However, do favour the regeneration of horse racing facilities on existing Green Belt sites.	Noted
	Disagree with option 4. Do not believe it is appropriate to lower the current threshold that applies.	Noted
	Do not agree that Option 3b should be included as it would further exacerbate the serious parking situation in the town.	Noted
	These are a series of questions and not options	Noted
	2g) Epsom Town: Option 6 - Seek to reduce traffic in the town centre by e.g. redirecting the A24.	
Town Ward Residents Association	Concerned that option 2 needs to be strictly controlled - not a licence to build in the Green Belt.	Noted. Detailed policy wording will be included in the submission version
	The should be an option that accepts that cars are a fact of life even if you live and work in the town centre. They will be used for social activities. Therefore option 3 car parking standards should exceed government guidelines.	Noted
	For Travel section, there should be an additional option - 'additional car park spaces to government guidelines'.	Noted
The Gypsy and Traveller Law Reform Coalition	Provided a link to a guidance document which gives advice on Gypsy & Traveller accommodation needs and the new planning system.	Will be addressed in the Site Allocation DPD
Rosebery Housing Association	Believe the Issues and Options document, broadly covers the key issues in the Borough.	Noted
	Agree with and support this section. It is vital the Council ensures that all resulting policies are supported by national and regional guidance. Also important to consider the adoption of the South East Plan and the guidance given regarding the provision of sustainable communities. Option 1 - Yes, 'encourage' but not at any cost. Option 2 - Yes. Option 3 - Yes, but not at any cost. Option 4 - planning policies alone cannot ensure the delivery of services, they can assist in planning for them. Option 5 - Yes, development should take place on PDL, but the rigid application of the sequential approach should be avoided. There will be cases where it is more sustainable to bring forward a greenfield site out of sequence where this would result in the provision of a significant amount of affordable housing. Other aspects of Sustainability: Sustainable development is about more than the environmental issues raised. Providing affordable homes is a key element of ensuring social progress is made; one of the 4 sustainable development aims of the government.	Policy Context' section added to each objective. Other comments noted.

Rosebery Housing Association	Agree it is important to preserve the Green Belt for the reasons set out in PPG2. However, consideration should be given to the possibility of small scale development adjoining settlements in the Green Belt for affordable housing where the need can be demonstrated. Options 1 - Yes, but consider amending to allow a limited amount of development where it would contribute to higher levels of affordable housing. Option 2 - As for option 1	Noted
	Agree with and support this section. The lack of affordable housing in the Borough is clearly a major problem and needs to be addressed with continued vigour to ensure households have a decent home and to ensure economic objectives can be realised. Important that a high proportion of all new housing built is affordable and remains affordable in the future - the Core Strategy should indicate the best way of achieving this is by the involvement of an RSL. It is important that a study is carried out identifying appropriate sites for housing development and how each can contribute to the supply of affordable housing. Also need a study to identify the types of housing requirements. It is vital that a wide range of housing needs can be met and the ability of development opportunities to deliver affordable housing should be a priority. Also agree with seeking new homes to be built to accommodate changing lifestyles. It is important that the Council considers issues of housing management when selecting sites and determining planning applications for housing. Option 1 - Yes, promote higher densities but care must be taken to ensure at scheme level, management issues are considered. Also recognise that the requirements for general market housing, in terms of unit size, may not be the same for those requiring affordable homes. Option 2 - All sources should be considered given the housing need position. Option 3 - Aim for 40% affordable housing on individual sites but accept this will not always be possible to achieve. Expect developers to demonstrate why 40% is not viable. Option 4 - Consider reducing the threshold to 10 units. Option 5 - Yes, no reason why market sheltered accommodation should not contribute towards affordable housing provision, on site (in separate block) if possible but as financial contribution last resort.	Objective 3 related to the provision of affordable housing. The Site allocations DPD will address the issue of identifying appropriate sites and the SPD will cover the detailed mechanisms for achieving affordable housing contributions.
	Agree with options. Option 3 - Introduce maximum standards and be willing to listen to the experience of the developer as suggested in PPG13.	Noted
	Believe there should be greater links between this section and the Sustainability & Housing sections of the Core Strategy. The Council should be seeking to encourage mixed use developments in order to promote sustainable development. This would include the provision of affordable housing in the town centres to help create a sustainable community. This employment section needs to promote the links with the sustainability section in order to avoid a contradiction between future policies that will hinder the provision of affordable housing. Option 2 - Yes, but also in other areas where harm would not result. Other options - the Council should explore and identify any outworn industrial areas and consider their suitability for affordable housing.	Sustainability is an overarching theme throughout the Core Strategy. The employment and housing section seek to find a balance between the correct amount of provision.
	Other options - An assessment should be made as to the value of existing facilities. Are there opportunities for providing some development, e.g. affordable housing, on part of some sites enabling the remainder to be enhanced?	The Council would seek to retain, improve and enhance existing facilities. Proposals to redevelop such facilities would be

		considered on a case by case basis.
Rosebery Housing Association	Would support the preparation of area action plans that would proactively support the town centres. Option 4 - Yes, but recognise that protection policies should not be applied without regard to the market.	Noted
	It is important to consider crime and disorder in design guidelines to ensure safer places. Option 3 - Not necessary in every case.	Met through Objective 18
Adults and Community Care Mid Surrey	General comment - In order to make the strategy more inclusive, more direct reference could be given to the needs of disabled people living in the Borough - especially since census data shows 27% of households having at least one person with a long term illness.	Met through Objective 25
Anon	Under Employment : where can we target training opportunities in order to recruit people into key posts where there are shortages e.g. Care Assistants? Under Community / Recreational / Cultural Facilities : Do we need to do more to ensure disabled people have access to good quality leisure facilities e.g. ensuring total compliance with the Disability Discrimination Act. Housing : Are we using existing sheltered housing schemes at optimum level to cater for the increasing number of older people with escalating needs in the Borough?	Planning can help to provide a range of employment opportunities and objective 3 aims to increase the amount of affordable housing which would be suitable for key workers. Objective 25 seeks to maximise accessibility to community facilities. Objective 5 seeks to ensure new housing is suitable for local needs which would include the elderly population.
Anon	Option 5 is outside the scope of circular 1/97. The Council may want to take legal advice on whether this option is feasible.	Noted
Anon	Option 6 does not appear to be an option, more an opinion or a statement of fact.	Noted
Anon	Options 1 - 4 appear to be questions not options	Noted
Anon	Whether to provide new sites for gypsies and travellers	Noted
Anon	Agree with option 1 only. Minimum development (if any) on Green Belt land.	Noted

Anon	Very large developments within the Town Centre area i.e. the main station plan & the old Iceland shop. Are these plans in line with keeping the Town Centre 'alive'? Over large store developments will decimate local shops, affecting employment and changing the nature of the Town Centre.	Noted. Objectives have been put in place with the aim of protecting local centres and maintaining and encouraging a suitable mix of uses in Epsom Town centre.
Anon	Specific sites should be allocated and reserved for categories of special need - particularly sheltered accommodation for the elderly. There should be a policy for the currently homogenous character of areas such as Stoneleigh and the development of large gardens should be discouraged.	Noted
Anon	Under housing on Green Belt topics there should be a presumption against the sale and subsequent development of school playgrounds and playing fields. This is currently a 'sore point' in Stoneleigh.	Noted. More detailed policies will be included in later Development Plan Documents
Anon	Under option 4 add, the need for highway works and parking associated with new developments	Covered in Transport and Infrastructure chapters.
Anon	Agree with Option 2	Noted
Anon	Option 2 - avoid infill sites. Option 4 - leave policy as it is, overcrowded developments will lead to social problems in the future. Option 5 - add in 'and other infrastructure needs'.	Noted
Anon	Option 3 - Agree with 3a) not 3b). 3b will just lead to more clogging up of the streets.	Noted
Anon	Option 4 - working from home needs no encouragement & is leading to new problems such as increased traffic & parking in residential areas as clients visit the 'home office'.	Noted
Anon	Option 1 - agree. Option 2 - Youth Centres. Option 3 - Town Centre, Ewell & Stoneleigh. Option 4 - Location / public transport is key. Option 5 - disagree. Developments often received planning permission with conditions as to opening hours, car parking, wider use - would breach these conditions.	Noted
Anon	Generally there is very little in the way of background on the issues and how the options came about. This makes the document difficult to understand. The following issues appear to be missing from the document: health, education, waste, noise.	Noted and addressed.
Anon	Clear reference to waste (policy of reduce, re-use, recycling) is missing.	This will be included in the policy wording under Objective 17
Anon	Development of Green Belt land must be resisted at all costs.	Noted
Anon	It is not clear which options relate to which issues. Option 2 is not worded properly as there are a number of options in it.	Noted

Anon	Obvious option missing in co-location of housing and jobs to reduce the need to travel.	Noted. Development is to be focused on the more sustainable locations which should help reduce the need to travel
Anon	Not sure which options relate to which issues. Agree that employment development should be located in areas with good access to public transport. Option 6 is badly worded. Should it be 'encourage further hotel accommodation in the Borough and with it new jobs'? Obvious option missing is the location of housing and jobs.	Noted
Anon	Options should be possible solutions, not questions. There is a lack of quality recreational grounds for children in the existing parks.	Noted
Anon	There is more to quality of life than a handful of design principles and measures to decrease the levels of anti-social behaviour. Does quality of life only apply to new development? What about quality of life in existing urban areas, crime and fear of crime?	Noted
Anon	Housing: Option - high density development in the centre of Epsom. Travel: Option - Improve public transport interface at railway station. Creation of frequent bus units along main roads in Borough. Option - Refurbishment and new shops located at Epsom railway station.	Noted
GVA Grimley on behalf of English Partnerships	Additional option - 'Policies to increase the supply of overall housing, and affordable housing particularly, to give everyone the opportunity of a decent home.'	Dismissed - unsuitable in many other ways
	Additional option - 'Selected Green Belt release in sustainable locations to meet the need for new housing.'	Noted. If residential development ceases to come forward on previously developed land, alternative sites may be considered through the Site Allocations DPD and review of the Core Strategy
	In Option 2, 'selected release of Green Belt in sustainable locations' should be added to the list of alternatives in brackets.	As above
Level Ltd	In terms of housing, the options paper is considered to fail to present a sufficient range of options to allow any genuine choices to be made, there is a distinct lack of an evidence base nor is adequate detail provided to enable consultees to make a meaningful response which is sufficient to inform the Core Strategy.	Noted

Levvel Ltd	PPS12 is clear that the options presented for consultation should be of sufficient detail to enable a meaningful response to be made based upon a genuine choice of options (para 4.12 PPS12 & Section 8.3 Companion Guide). The options put forward for consideration by the Council in relation to housing are not considered to present consultees with a range of options, nor are the supported by sufficient detail. The information presented fails to offer genuine choice. Consultees are restricted to either agreeing or disagreeing with a series of absolute statements. The paper in its current format is not therefore considered to present a sufficient basis for the consideration of options in terms of housing issues locally as required by government guidance.	Noted
Atkins (on behalf of Mr Shafer)	Option 5 - to be amended to read "Development should be located in the most sustainable location based on a sequential approach to land allocation"	Sequential tests will be undertaken where required including for the Site Allocation DPD
	Option 1 - to be amended to read "Review Green Belt designations in key locations with access to public transport and services, in order to assess whether the alteration of Green Belt boundaries is necessary to meet the Borough's future development needs in a sustainable way"	Noted. If residential development ceases to come forward on previously developed land, alternative sites may be considered through the Site Allocations DPD and review of the Core Strategy
	Option 2 - to be amended to read "Sites for housing will be allocated after a thorough assessment of urban capacity. A sequential approach to land allocation will be adopted in accordance with the guidance given in PPG3 to ensure that the most sustainable locations for future housing development are identified"	Noted
Barton Willmore Partnership (on behalf of Racecourse Holdings Trust)	Sustainability section dwells on environmental and social issues, but neglects economic sustainability (see 2e below)	Preferred Options paper was reconfigured
	Seek an amendment to the Green Belt boundary to exclude the main complex of structures at the racecourse, or at the very least for this area to be allocated as a Major Developed Site (MDS) in the Green Belt	Noted. Previously dismissed at Local Plan Inquiry by Inspector; a view also supported by many local residents and stakeholders. Will be reconsidered at Site Allocations DPD stage

	Racecourse should be identified as a location for business as well as horseracing, as a link exists between its future and its economic viability	Noted.
	Council should recognise the limitations of the town centre in terms of the availability of suitable sites	Noted. The Council aims to maintain and encourage a suitable mix of uses. The range of objectives should help to identify the most suitable sites
	Support good design, though Council should be realistic in its expectations as developers seeks to deliver viable schemes	Noted
RPS Planning (on behalf of Fairview New Homes Ltd)	The cost of energy efficient homes is normally borne by the end purchaser increasing house prices. If borne by the developer, this may effect the viability of the scheme, stifling regeneration	Noted
	Provision of affordable housing should be calculated for each individual site to reflect other costs/constraints, again to prevent appropriate developments coming forward	Noted
	Again car parking should be decided on a site by site basis, in line with location, design, housing type and local demographics (age, income and household type which can effect car ownership)	Noted
Bellway Homes	The provision of smaller units will also allow people to enter the housing market	Covered in Objective 5
Rapleys (on behalf of Wm Morrison Supermarkets plc)	Council should adopt flexible retail policies to reflect increases in the number of households	Noted
King Sturge	Option 1 needs to recognise that the use of renewable energy is not appropriate in all development proposals. Therefore, whilst the overall objective is sound, it should be amended to read "Policies should be introduced to encourage energy efficient developments/use of renewable energy where appropriate, even if they cost more"	Noted
	Option 5 tries to deal with 2 of the most important ways in which the planning system can contribute towards the sustainability objectives and should therefore be expanded. As worded currently, option 5 simply refers to all forms of development, whereas Government Guidance is quite explicit that it is those which attract large numbers of trips which need to follow the sequential approach. Preference explicitly needs to be given to the town centre if it is to comply with national policies. PPS6 makes it clear that sustainable development is the core principle underlying planning, with Paragraph 1.3 of PPS6 as being promoting the vitality and viability of town centres, by planning for their growth and development and actively promoting and enhancing existing centres by focusing development in them. It encourages a wide range of services in a good environment, accessible to all. The re-use of previously developed land is a key objective which should stand on its own, rather than just be bolted on at the end. The option	Comments noted and covered within the Town Centre section

	<p>could be broken down and amended to read: "Option 5 - Best use of previously developed land should be made to help meet future development needs". Option 6 - Proposed development which would attract large numbers of trips should follow the sequential approach, whereby first preference is given to town centres, followed by edge-of-centre locations. Only then can out-of-centre sites, which are well served by a choice of means of transport, be considered. Option 7 - encourage a full range of shops and services to locate within the main centres, together with employment and leisure opportunities</p>	
	<p>The Core Strategy is right to include Epsom Town Centre as one of the main topics within the Issues & options document, in view of its key role within the Borough. It needs to be recognised that the retail function has the single most important role in maintaining the vitality and viability of the town. Yet its future health cannot be taken for granted and indeed, since 2000 the following major retailers have all closed their town centre stores: Sainsburys, Currys, Dixons, Top Shop, Laura Ashley, Mothercare and Gap. Government Guidance is quite clear that Councils should actively plan for growth and development of existing centres to promote their vitality and viability. To do so makes a significant contribution towards the sustainability objectives. It is therefore suggested that Option 1 be split to specifically address the retail function of the town centre, being going on to promote other uses. The following wording is suggested: "Option 1a - strengthen the retail function of Epsom Town Centre, by actively planning and encouraging a full range of shops and services. Option 1b - Promote a mix of other uses in the town centre, including offices, residential, leisure and other community facilities"</p>	<p>Objective 22 seeks to maintain and encourage a suitable mix of uses in Epsom Town Centre.</p>

Appendix 3: Preferred Options Questionnaire

CORE STRATEGY: Preferred Options



Your feedback from these questions will help shape the submission version of the Core Strategy: part of the Local Development Framework – the replacement of the existing Local Plan. Please complete this questionnaire and return to the Town Hall by **Tuesday 28 February 2006** at the latest.

If you have any queries, please contact Susie Peck on 01372 732393

1) Please state your name and, if appropriate, organisation:

2) Please indicate your level of agreement / disagreement with the Council’s Preferred and Alternative Options:

Issue		Objectives and Options	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Housing	Amount of land to be identified for new housing provision	1) Preferred: Aim to identify sufficient land to deliver the Borough’s housing allocation					
		Alternative: Identify land over and above the Borough’s housing allocation requirement					
	Location of new housing provision	2) Preferred: Focus housing development on previously developed land					
		Alternative: Allow for urban extensions in areas with good transport links and other community facilities					
	Affordability	3) Preferred: Increase the proportion of affordable housing in new developments with the objective that a significant percentage of all new housing provision within the Borough should be affordable					
		Alternative: Retain the threshold for affordable housing as identified in the current Local Plan (2000)					
	Density of new dwellings	4) Preferred: Encourage higher densities in town centres and sustainable locations					
		Alternative: Encourage higher densities in all new developments					
	Size and types of new dwellings	5) Preferred: Aim to achieve a balance between the range of housing available in relation to the size and types of new dwellings according to local needs					
		Alternative: Allow developers to decide the size and types of new dwellings					

Issue		Objectives and Options	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Employment	Maintaining a suitable employment mix within the Borough, providing for existing and future business needs	6) Preferred: Maintain mix of employment uses and different sized employment premises to provide for existing and future businesses, where appropriate					
		Alternative: Adopt a flexible approach allowing the market to dictate what is required in terms of employment space, permitting changes of use and redevelopments to alternative uses					
	Protecting employment sites in sustainable locations	7) Preferred: Protect and preserve well located employment sites (in sustainable locations)					
		Alternative: Adopt a flexible approach of permitting employment uses to come forward for other redevelopment to other uses, such as residential					
Supporting sustainable methods of working	8) Preferred: Aim to support new working methods that limit the need to travel, including working from home where appropriate						
Natural Environment	Protection and enhancement of the Green Belt	9) Preferred: Continue to exercise strict control over development and maintain Green Belt boundaries					
		Alternative: Allow for selected Green Belt releases in sustainable locations to meet the need for new housing					
	Protection and management of open spaces	10) Preferred: Provide and protect the required quantity, and improve the quality of open spaces for residents, workers and visitors to the Borough, and improve access to them					
		11) Preferred: Protect and enhance areas that are nationally, regionally or locally designated as sites of nature conservation interest					
	Flooding	12) Preferred: Adopt a risk based approach to development in flood risk areas					
Safeguarding and improving biodiversity	13) Preferred: Seek to protect important habitats and species, and where possible aim to provide opportunities to enhance biodiversity						

Issue		Objectives and Options	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Urban Design and the Built Environment	Protection and enhancement of Conservations Areas, listed buildings and archaeological remains	14) Preferred: Seek to protect and enhance Conservation Areas and the setting of listed buildings					
		15) Preferred: Provide appropriate protection for sites of archaeological importance, scheduled ancient monuments and future discoveries of archaeological interest					
	Ensuring high quality design	16) Preferred: Ensure all aspects of new development complement and positively contribute to the character of the area					
		17) Preferred: Aim to use good design to incorporate a variety of sustainable elements and principles into new developments					
		Alternative: Encourage developers to introduce sustainable elements into new developments					
	18) Preferred: Aim to use good design to help create safer environments						
Transport and Infrastructure	Mode of transport used	19) Preferred: Encourage non-motorised forms of travel					
	Highway safety	20) Preferred: Implement highway safety measures					
	Infrastructure requirements	21) Preferred: Ensure infrastructure is provided in advance of, or at least in parallel with, the associated development					
Town Centre & other Local Shopping Centres	Maintaining and enhancing the vitality and viability of Epsom town centre	22) Preferred: Maintain and encourage a suitable mix of uses in Epsom Town Centre					
		Alternative: Allow the market to direct uses within the town centre					
		23) Preferred: Safeguard and promote retail facilities in local centres					

Issue		Objectives and Options	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Community, Recreational and Cultural Facilities	Mix of community, recreational and cultural facilities	24) Preferred: Protect, improve and provide community facilities, especially ones that specifically cater for young and old people					
		Alternative: Seek to protect, enhance and provide community facilities, but have no particular focus on any age or people group					
	Maximising use and accessibility	25) Preferred: Maximise use and accessibility of all community, recreational and cultural facilities, both indoor and outdoor, so all facilities are made as widely available and accessible as possible to all residents and other Borough users					
		Alternative: Permit organisations to utilise their own facilities, and not make them available to the wider public					

Please state reasons, where appropriate, for your choices, particularly if you disagree or strongly disagree with the preferred option objective (continue on a separate sheet if required)

3) **Please state any other comments you have with regard to the document in the space provided (continue on a separate sheet if required)**

Thank you for taking the time to read the document and complete this questionnaire.

Please return completed questionnaires to the Council by **Tuesday 28 February 2006** at the latest.

Return to: *Susie Peck, Planning Department, Epsom & Ewell Borough Council, Town Hall,
The Parade, Epsom, Surrey, KT18 5BY*

Your name and contact details will not be used for any other purpose except for use by the Council’s Planning and Consultation departments to contact you regarding future consultation for the preparation of the Local Development Framework. Anonymised responses may be made available to partner agencies and other interested parties

Appendix 4: Quantified Questionnaire Responses

Issue		Objectives and Options	% Strongly Agree / Agree	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	% Disagree / Strongly Disagree
Housing	Amount of land to be identified for new housing provision	1) Preferred: Aim to identify sufficient land to deliver the Borough's housing allocation	89	16	9	0	1	2	11
		Alternative: Identify land over and above the Borough's housing allocation requirement	19	2	3	0	7	14	81
	Location of new housing provision	2) Preferred: Focus housing development on previously developed land	92	15	9	1	0	1	4
		Alternative: Allow for urban extensions in areas with good transport links and other community facilities	27	3	4	2	7	10	65
	Affordability	3) Preferred: Increase the proportion of affordable housing in new developments with the objective that a significant percentage of all new housing provision within the Borough should be affordable	69	6	14	2	3	4	24
		Alternative: Retain the threshold for affordable housing as identified in the current Local Plan (2000)	33	4	3	3	9	2	52
	Density of new dwellings	4) Preferred: Encourage higher densities in town centres and sustainable locations	80	9	15	2	2	2	13
		Alternative: Encourage higher densities in all new developments	17	2	2	3	8	8	70
	Size and types of new dwellings	5) Preferred: Aim to achieve a balance between the range of housing available in relation to the size and types of new dwellings according to local needs	88	15	8	1	1	1	8
		Alternative: Allow developers to decide the size and types of new dwellings	22	1	4	0	7	10	77

Issue		Objectives and Options	% Strongly Agree / Agree	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	% Disagree / Strongly Disagree
Employment	Maintaining a suitable employment mix within the Borough, providing for existing and future business needs	6) Preferred: Maintain mix of employment uses and different sized employment premises to provide for existing and future businesses, where appropriate	83	13	7	3	1	0	4
		Alternative: Adopt a flexible approach allowing the market to dictate what is required in terms of employment space, permitting changes of use and redevelopments to alternative uses	22	1	4	4	8	6	61
	Protecting employment sites in sustainable locations	7) Preferred: Protect and preserve well located employment sites (in sustainable locations)	93	14	11	1	1	0	4
		Alternative: Adopt a flexible approach of permitting employment uses to come forward for other redevelopment to other uses, such as residential	14	1	2	2	8	9	77
	Supporting sustainable methods of working	8) Preferred: Aim to support new working methods that limit the need to travel, including working from home where appropriate	82	13	10	3	2	0	7
Natural Environment	Protection and enhancement of the Green Belt	9) Preferred: Continue to exercise strict control over development and maintain Green Belt boundaries	82	20	3	4	0	1	4
		Alternative: Allow for selected Green Belt releases in sustainable locations to meet the need for new housing	28	3	4	1	3	14	68
	Protection and management of open spaces	10) Preferred: Provide and protect the required quantity, and improve the quality of open spaces for residents, workers and visitors to the Borough, and improve access to them	100	21	10	0	0	0	0
		11) Preferred: Protect and enhance areas that are nationally, regionally or locally designated as sites of nature conservation interest	90	20	6	1	2	0	7
	Flooding	12) Preferred: Adopt a risk based approach to development in flood risk areas	96	15	12	1	0	0	0
	Safeguarding and improving biodiversity	13) Preferred: Seek to protect important habitats & species, & where possible aim to provide opportunities to enhance biodiversity	97	15	13	1	0	0	0

Issue		Objectives and Options	% Strongly Agree / Agree	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	% Disagree / Strongly Disagree
Urban Design and the Built Environment	Protection and enhancement of Conservations Areas, listed buildings and archaeological remains	14) Preferred: Seek to protect and enhance Conservation Areas and the setting of listed buildings	97	21	7	1	0	0	0
		15) Preferred: Provide appropriate protection for sites of archaeological importance, scheduled ancient monuments and future discoveries of archaeological interest	93	13	12	2	0	0	0
	Ensuring high quality design	16) Preferred: Ensure all aspects of new development complement and positively contribute to the character of the area	93	20	8	2	0	0	0
		17) Preferred: Aim to use good design to incorporate a variety of sustainable elements and principles into new developments	100	18	11	0	0	0	0
		Alternative: Encourage developers to introduce sustainable elements into new developments	48	5	7	5	6	2	32
		18) Preferred: Aim to use good design to help create safer environments	96	14	11	1	0	0	0
Transport and Infrastructure	Mode of transport used	19) Preferred: Encourage non-motorised forms of travel	67	16	3	3	3	2	19
	Highway safety	20) Preferred: Implement highway safety measures	84	10	11	2	2	0	8
	Infrastructure requirements	21) Preferred: Ensure infrastructure is provided in advance of, or at least in parallel with, the associated development	97	20	9	1	0	0	0
Town Centre and other Local Shopping Centres	Maintaining and enhancing the vitality and viability of Epsom town centre	22) Preferred: Maintain and encourage a suitable mix of uses in Epsom Town Centre	93	15	11	2	0	0	0
		Alternative: Allow the market to direct uses within the town centre	10	0	2	2	10	7	81
		23) Preferred: Safeguard and promote retail facilities in local centres	96	16	11	1	0	0	0

Issue		Objectives and Options	% Strongly Agree / Agree	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	% Disagree / Strongly Disagree
Community, Recreational and Cultural Facilities	Mix of community, recreational and cultural facilities	24) Preferred: Protect, improve and provide community facilities, especially ones that specifically cater for young and old people	96	12	13	1	0	0	0
		Alternative: Seek to protect, enhance and provide community facilities, but have no particular focus on any age or people group	25	2	3	6	7	2	45
	Maximising use and accessibility	25) Preferred: Maximise use and accessibility of all community, recreational and cultural facilities, both indoor and outdoor, so all facilities are made as widely available and accessible as possible to all residents and other Borough users	78	12	9	3	3	0	11
		Alternative: Permit organisations to utilise their own facilities, and not make them available to the wider public	26	0	5	7	4	3	37

Appendix 5: Detailed summary of responses from the Preferred Options consultation and how they have been addressed in the submitted Core Strategy

General Comments

Source of Comment	Summary of Comment	Council's Response
South East England Regional Assembly	Unable to comment in detail. Ensure DPD's are in general conformity with the current Regional Spatial Strategy (RPG9) and the Emerging Draft South East Plan	Noted. SEERA consulted again informally, prior to submission of Core Strategy
Disability Rights Commission	Do not have the resources to respond	-
St Joseph's Catholic School	Epsom would be greatly enhanced if there was not so much traffic congestion. Given that it is unrealistic in the short term to expect traffic levels to fall, the Council should do more to improve the flow of traffic. Concerned about a particular junction - Chase Road, where there may be problems with the traffic light sequencing.	A general policy on transport and travel is included in the Core Strategy which will help to ensure that new development does not exacerbate existing congestion but where possible, provides for alternative methods of travel to the car.
British Waterways	No comments as BW does not own or manage any land or waterways within the Borough	-
Ewell Village Residents Association	It is not difficult to agree with the preferred options or disagree with the alternative options because they make good sense in terms of local development. Wish for the options to be prioritized as consider some to be far more important than others, for example those concerned with maintaining the Green Belt, matching infrastructure to any new development and permitting housing only according to the needs of the Borough. These should receive the highest priority in terms of policy, effort and funding.	Noted. All the policies contained within the Core Strategy have been identified as being particularly important issues within the Borough and will contribute towards its long term sustainability.
Tourism South East	TSE have provided a range of sector specific paragraphs for the LDF. The comments emphasize that tourism is important to the regional and local economy and should specifically feature in any 'Economic Development' chapter. Policy should protect the environment but there should be a balanced view between the need to protect the environment and the benefits that tourism initiatives can bring to the area. Priority should be given to improving the quality of existing attractions and provide high environmental standards. TSE considers that high quality accommodation is an essential component for the overall improvement of the local tourism product. Existing visitor accommodation should be protected, particularly where there is pressure from a loss to other uses. the development of 3/4 star hotels is a particular priority for investment within the region - TSE suggests a flexible approach which would encourage the location of new hotel development at specified locations, but would also permit hotel development at alternative sites. Recognition needs to be given in planning policy to the potential benefits that conference facilities can provide. The	These matters will be addressed in subsequent Development Plan Documents – particularly the Development Control Policies DPD and Site Allocations DPD.

	LDF should make adequate provision for new or existing significant regional sporting venues to redevelop or expand in order to meet future needs.	
Commission for Architecture and the Built Environment (CABE)	Insufficient resources to deal with all the consultation documents they receive. Therefore have no comments. This should not be interpreted as tacit endorsement of the document)	Noted
Epsom Protection Society	Suggest a sentence to be added within the first paragraph on page 8 - for example 'The Secretary of State agrees that the Council can meet their Structure Plan housing requirement without encroaching on the Green Belt' (This is lifted from the ODPM letter dated 30 November 2005 regarding the South Hatch Stables appeal)	Core Strategy reflects housing allocations required under the Regional Spatial Strategy; land availability is considered sufficient to ensure no release of Green Belt
Mole Valley & Epsom Green Party	Extract from Friends of the Earth 'Big Ask' provided containing policy examples. For example LB of Merton are intending to include 'The Council will require all developments, either new build or conversion, with a floor-space of 500m sq, or one or more residential unit, to incorporate on-site renewable energy equipment to reduce predicted CO2 emissions by at least 10%'. Other examples and advice are included.	The Council has included a policy on sustainability in new developments, with further detailed guidance to be provided in an SPD.
Thames Water	Housing: Thames Water investment programme is based on development plan allocations, which form the clearest picture of the shape of the community. Once Thames Water has an indication of the specific areas that are being considered for development, they are able to consider any of the issues associated with infrastructure.	The Council will maintain an ongoing dialogue with Thames Water to ensure that infrastructure issues are dealt with; specific sites will be allocated in later Site Allocations DPD.
	Thames Water would prefer to plan for a small number of large sites rather than a large number of small sites. They will need to investigate the impact of the new development sites within the local plan on the existing water and wastewater network. Developers must be required to demonstrate that there is adequate infrastructure capacity on and off the site and that proposed developments will not have an adverse impact on existing customers	Noted. Core Strategy contains a policy to ensure developers demonstrate that the service and community infrastructure necessary to serve the development is available.
	Even small infill development and brownfield redevelopment can have significant impact on the infrastructure. If necessary, developers would be required to fund impact studies and upgrading of the network. On brownfield sites there may be Thames Water Utilities assets crossing the site. In such cases the developers would be required to pay for any mains diversions and new off-site infrastructure.	Noted. This is covered in Core Strategy policy
Epsom & Ewell History and Archaeology Society	The development of site granary site in Ewell Village is open to the strongest criticism. Conservation areas require more consultation than has been given to this case.	Noted. The Council is conducting Conservation Area Appraisals, and has issued an 'Options Paper' on Site Allocations which invites views on Conservation Area boundaries

Anon	It is a pointless exercise having a Local Plans when there is something the councillors are not sure about, the planning officers are not forth coming with a solution seeming to push it through regardless and if challenged, delight in saying if you don't pass it, the government inspector will.	Noted.
Lambert Smith Hampton (on behalf of National Offender Management Service)	While there are no specific proposals for new prison development in Epsom and Ewell at present, nor specific sites identified, in line with Government guidance NOMS requests that the council consider the inclusion of a criteria based policy to deal with a firm prison proposal should it arise during the plan period. Would be pleased to propose a detailed policy for inclusion in the Council's DPD and would welcome views on how this proposal should be taken forward.	Noted
Waverley District Council	No comments	-
Highways Agency	The first point of contact of interest for the Highways Agency is the M25. Look to the Council's LDF to promote strategies, policies and land allocations that will reduce the need to travel particularly by the private car.	This is a main objective of the Transport and Travel section.
	Wish to highlight the importance of linking the provision of infrastructure to the development proposed in the LDF, as set out in PPS12 Appendix B	Noted
	Suggest that potential traffic and transport effects of all proposed development locations should be considered as a proactive input to the sustainable planning process. Strategies should take the opportunities to reduce the need to travel and reliance on the private car, reduce the distance travelled, encourage travel by sustainable modes and address any local air quality issues	Noted
	Pleased to note that emphasis is given to transport matters but would suggest that on page 32, the first numbered point ('mode of transport used') should be amended to read 'Identification of opportunities to reduce the need to travel and encourage the use of sustainable transport modes'. This would be better aligned with PPG13	Noted
	The HA note that transport sustainability is mentioned in the sustainability appraisal	Noted
Resident	Feel it is essential for all infrastructure to be in place before or alongside new developments. Presumably utility companies have been invited for their input	Utility companies have been involved in preparing the Core Strategy. There is a specific policy to help ensure that the infrastructure required by a new development will be provided
	Scarcity of water brings serious doubts as to whether future housing developments are sustainable	Noted. New developments will be required to make the most efficient use of this scare resource, recycling and reducing usage where ever possible.
	Countryside needs to be preserved, particularly SSSIs, AGLVs and other valuable open spaces	Designated areas are given protection in the Core Strategy.
	The Green Belt needs to be maintained. There is a need to curtail speculators purchasing designated Green Belt land for inappropriate developments and in the meantime allowing the land to deteriorate. Measures must be taken to improve the management of such land	Noted. The Core Strategy contains a policy dedicated to the Green Belt where it is stated that its general extent will be maintained. Management initiatives are also supported.

	Development in areas of flood risk should not be permitted, especially with the threat of global warming	Noted. Covered in policy
EEBC Employee - Tree Officer	Should there be any consideration to biomass volumes in view of the Kyoto Protocol	There is the potential for developers to be required to contribute towards offset schemes such as local afforestation programmes.
John Sharkey & Co on behalf of the University College for the Creative Arts	It would be useful to mention early on in the document that the LDF must adopt a spatial approach. PPS 12 Para 1.8 states this and also mentions that 'where other means of implementation are required, these should be clearly identified in LDDs'. JS emphasize the word 'clearly'	The spatial nature of the Core Strategy has been clearly emphasised, and implementation mechanisms identified
	It is disappointing that consultation comments and the Council's response from the previous stage have not been made available. The publication of this would have resulted in better informed comments being made on the Preferred Options document	Noted
	It is stated in the document that specific policy wording is not included. This seems to be in contravention of PPS12 (specifically Para 4.12). Feels that communities and stakeholders are not being given reasonable opportunity to comment on the actual or alternative policies. The document therefore loses some of its usefulness	In accordance with government advice, the specific policy wording has been included in the submission version. The earlier consultation documents were vital in developing the correct objectives for the Borough. These objectives have then been developed into policies in the submission document.
	Suggested amendment to page 3, final paragraph, change to '.....those who live, work and study in the Borough by.....'	Noted. Reference to those that study now included
	Comment relating to the Introduction. There is no reference in this section that the matters in the document will be dealt with under 7 headings (housing, employment etc.....), nor is there any clear link drawn between the five objectives set out in the Community Strategy and those seven headings.	The introduction now contains more specific detail as to how the objectives relate to the Community Strategy, and describes the relationship between these two key documents.
	In the Community Facilities section, the range of uses listed should be widened to include 'Higher Education'. It should be noted that the University College for the Creative Arts has a campus in Epsom. This has been omitted	The importance of education facilities has now been included.
	Core Diagram: Does not seem to be in accordance with PPS12 which states that 'general locations for strategic development, major transportation issues and main patterns of movement' which should illustrate the broad strategy for the area in diagrammatic format. the key diagram provides an opportunity to show links and relationships with other strategies and plans in the neighbouring areas	The Key Diagram has been amended and is considered to be in accordance with the Regulations
	The document does not seem to be in accordance with PPS 12 Para 2.10. The CS should comprise; a spatial vision (it is assumed that the final paragraph on pg 3 contains this), Strategic objectives for the area, A spatial strategy, Core Policies (not contained), A monitoring and implementation framework (not contained)	These matters are contained in the submission document.

Surrey County Council	The CS needs to include an explanation as to the County's role as the minerals and waste planning authority for Surrey and the requirement for a Minerals and Waste LDF. Also need to address the issue of providing additional waste management capacity to handle increased recycling as well as waste that is increasingly diverted from landfill and the need to relocate the Epsom Civic Amenity Site identified in the Surrey Waste Plan	The role of Surrey County Council is referred to in the submission document.
Countryside Agency	Landscape: Recommend the Borough carries out a landscape character assessment (LCA) to protect the quality of the landscape. If this is absent, the LDF should develop these policies based on an understanding of landscape character, replacing the need of local landscape designations (PPS7 para 24-25). Recommend the use of SPD so as to provide character analysis at an appropriate level of detail to inform planning policies and decisions. A guide for sustainable design would also be useful	A chapter in the Core Strategy has the over arching objective to 'Conserve and Enhance Open Space and Landscape Character'. The council will consider whether to undertake a landscape character assessment as part of a future review of its LDS
	Rural Urban Fringe: LDF should; promote the management of the RUF as a multifunctional resource; protect and expand networks of green spaces, foot and bicycle path through good management arrangements; conserve attractive landscapes and enhance damaged ones; consider opportunities for rural-urban initiatives. Recommend the use of Area Action Plans.	Noted. The Council will support initiatives which contribute towards improving green spaces such as the Lower Mole Countryside Management Project and the Green Arc. These are referred to in the Core Strategy.
	Design: Recommend that LDFs encourage development that enhances local distinctiveness and contribute to a sense of place by; identifying areas of existing sense of place to be protected (a design guide could become an SPD); considering how development can help restore and strengthen an area; promoting good design in future development	The Council considers the quality of the Borough's built environment and its landscape to be extremely important. Policies are included to protect and enhance this. The Council will produce further guidance in Supplementary Planning Documents
	Recreation: LDF should contain and promote a spatial countryside recreation network. This should allow easy access to the countryside; promote the management of recreation opportunities; recognize the need for formalized rural recreation activities.	Noted. Policy is included to support Green Belt Management initiatives
	Access: Ensure existing and potential rights of way networks are protected and recognize links to other local documents like Local Transport Plans and to other policies.	Noted, and references are included
	Transport: Transport infrastructure must be planned, designed and maintained in a way that respects the landscape character; integrate first rate alternatives to car travel; promote improved walking and cycling networks	Noted. Alternatives to the private car are promoted and the importance of inclusive design which takes account of accessibility by sustainable travel means is emphasised.
Mono Consultants on behalf of the Mobile Operators Association	Suggest that telecommunications policy be contained within a main statutory Local Development Document as a stand alone policy. Policy wording suggested: <i>Refer to original consultation response</i> . Any background information should be contained within a separate LDD or SPD	Noted. A telecommunications policy will be included in the Development Control Policies DPD
English Heritage	The section on sustainability states that the Core Strategy has been cross-checked with the Government's 1999 Sustainability Strategy. This needs to be updated to reflect the government's review of that strategy 'Securing the Future..... (March 2005).	Noted

	English Heritage has some concern with the word 'balance' when considering economic, social and environmental factors. This implies a straight choice between conflicting demands on land resources. PPG15 refers to 'reconciling' development with the need to protect the natural and historic environment. Welcome the reference on page 4 to the need to improve the quality of the natural and built environment	Noted
English Heritage	Welcome the reference on page 8 to the need for care in redeveloping areas and the maintenance of the character of surrounding areas. Draw attention to the RSS policy BE2 that calls upon LDFs to incorporate clear planning and design guidance in relation to intensification of predominantly residential neighbourhoods and the use of character appraisal. The general introduction on page 26 is along the same lines and the ref to quality of life is appropriate.	Noted. The Council is conducting Conservation Area Appraisals / Management Plans and will produce further design guidance in future SPDs. These issues are covered in policies aimed at enhancing the built environment.
Environment Agency	Overall the Environment Agency is encouraged to see 'a protected and improved environment' as one of Epsom and Ewell's main objectives	Noted
	You should be undertaking your own Strategic Flood Risk Assessment (SFRA) which will give you a better understanding of flood risk within the Borough. Contact at the EA for more info on this.	Noted. The Council will consider undertaking this as part of the Site Allocations DPD
Campaign for Real Ale (CAMRA)	Disappointed that the contribution that public houses make to community life is not recognized in this document. Some protection against the loss of public houses as an amenity should be afforded, particularly where there is no other within walking distance.	Public houses are considered to be a community facility and are therefore included in the policy for the protection of recreation, community and cultural facilities.
English Nature	Sustainability Appraisal: The SA should compare and contrast different options and highlight which of these is most sustainable. However many options have no alternative so this has not been possible in many instances. Preferred Option 1) EN does not agree that this option will make a positive sustainable contribution towards biodiversity in the short term and may have a negative impact. However, agree that the alternative option would negatively affect biodiversity. When the Core Strategy is published EN anticipate finding specific reference to preservation of the natural environment within the housing objectives.	Noted. Reference is made in policies to the importance of protecting (and enhancing) the natural environment
	Sustainability Appraisal: Preferred Option 9) The preferred option may not necessarily bring positive benefits for wildlife as brownfield sites may be more biodiverse than greenfield, especially those that are intensively farmed.	Noted.

Comments Relating to Specific Options

Housing Comments		
Government Office of the South East	Objective Housing) Omission of objective from housing section; document currently makes no mention of the Council's approach towards site provision for gypsies and travellers. Circular 01/2006 states that the CS should set out criteria for the location of G&T sites to guide the allocation of site in other relevant DPD's. These criteria should also be used to meet unexpected demand. It would appear that the housing needs survey 2004 did not consider the need for site provision for these groups. Strongly encouraged to rectify this omission before submission stage.	A section and policy has been introduced which details the Council's approach towards site provision for gypsies and travellers.
Resident	Objective Housing) Preferred options agreed with but doubts with sustainability. High rise buildings should be avoided as these would be totally out of character. New housing requires adequate garage/parking facilities. Some recent developments fail in this respect.	Noted. Design policies require development to reinforce local distinctiveness. Further specific policies will be included in later Development Plan Documents
English Nature	Objective Housing) Housing can have a dramatic effect on wildlife either direct or diffuse and these impacts can be assessed more thoroughly if a plan showing the layout of proposed development is included with the Core Strategy. EN would therefore like to see a housing allocations map which incorporates locally and nationally designated sites in order to assess the degree of impact on the sites.	A map detailing development sites will be produced as part of the Site Allocation Development Plan Document. The Core Strategy directs the broad locations for new development, rather than specific sites. A policy is included to protect locally and nationally designated sites
Local Committee for Epsom and Ewell	Objective Housing) There is a need for new development to be of a high standard of design and layout and supported by necessary infrastructure. An important element within the Borough is the provision of open space. The density requirement across the urban area should be capable of delivery without detrimental impacts on the urban environment and residential amenity.	Noted. These issues are dealt with in several policies in the Core Strategy. Further details will be provided in later DPDs / SPDs
Objective 1: Identification of Land for the Borough's Housing Allocation		
Epsom Protection Society	Objective 1) Would prefer that no alternative Objective is identified. Land will need to be identified as and when required to meet existing or increased targets	The preferred option has been taken forward. The Council's approach is to provide for the number of homes required by the South East Plan, and to monitor the position regularly to ensure the required provision is made.
Home Builders Federation	Objective 1) Housing target should be viewed as a minimum given the likely outcome of the South East Plan and the Government's commitment to increase housing supply in the South East	Noted. The Core Strategy reflects the South East Plan requirement
Ewell Downs Residents Association	Objective 1) This does not allow for 'windfalls' so should be less than sufficient. It implies acceptance of yet undecided allocation	Windfalls have been accounted for when calculating the Borough's housing allocation identified in the South East Plan
Highways Agency	Objective 1) Supported if the alternative option would result in an extra pressure on the trunk road network	Noted

Government Office of the South East	Objective 1) PPS 12 stipulates the time horizon of the core strategy should be for a period of at least 10 years from the date of adoption. As the estimated date for adoption is 2007, GOSE would expect provision to be made for housing at least until 2017. Please ensure this is taken account of. To strengthen the soundness and robustness of the CS, you may wish to consider an approach to housing provision after the end date of the Surrey Structure Plan, for example; 1) what yield do you think your strategy will provide after 2016? 2) What completions will part implemented developments provide after 2016? 3) What about PDL after 2016? 4) What do household projections and work on the emerging South East Plan tell you about the likely requirements after 2016?	The Core Strategy covers a 15 year period from 2007 – 2022. The Council is committed to provide housing in line with the figures provided in the South East Plan during this period. The Council will adopt a 'Plan, Monitor, Manage' approach, keeping the situation under review to ensure targets are being met.
Environment Forum	Objective 1) Do not agree that the Borough should have to identify enough land to satisfy very high levels of housing imposed from the outside. If the allocation is excessive, the Borough should not be required to fulfil these targets. The Borough should identify some land but the amount of new housing should not be beyond the capacity of the environment or infrastructure to support it. Preferred option might be reworded to state: 'Aim to identify sufficient land for reasonable growth in housing, within the limits of environmental and infrastructure constraints'. Very much disagree with the alternative option. If there is not enough water then continuing growth of housing is unsustainable.	Noted. The overarching policy of sustainable development will ensure that development within the Borough remains within its environmental, social and economic limits. Supporting policies will ensure that the impact of development is reduced and that the necessary infrastructure will be in place.
John Sharkey & Co on behalf of the University College for the Creative Arts	Objective 1) There is no reference to the emerging South-East plan, even though there is such reference in the equivalent paragraphs for other Preferred Options	The South East Plan is now referred to
Surrey County Council	Objective 1) There should also be reference to the emerging South East Plan under the preferred option. The alternative would add to existing pressures on infrastructure and could require the release of greenfield sites.	Noted. The South East Plan is now referred to
Atkins on behalf of Mr R.L Shafter	Objective 1) Strongly disagrees with the preferred option. Consider it likely that the Structure Plan requirement for 3000 dwellings will be increased as a result of the SEP examination in public and report expected in 2007. In light of this uncertainty and the current unknown quantity of PDL it would be prudent to identify an additional number or 'reserve quota', of housing at this stage in the LDF preparation. If the numbers do increase, this will avoid the need for additional resources to undertake further SA later in the process if it has already been addressed. This approach was adopted by Hampshire Local Authorities following a requirement in the Hampshire County Structure Plan and in response to the plan, monitor, and manage system. This is even more implicit in Epsom and Ewell due to the uncertainty of housing requirements and the need to subject the policies and proposals of all LDD's to the SA process. The reserve housing provision and any reserve housing sites identified in the proposed Sire Allocations DPD could be removed or held in 'reserve' should they not be required following the adoption of the SEP. Therefore strongly agree with the alternative option but not with the negative statement 'placing extra pressure on open spaces and limited infrastructure' (pg 7).	Noted. The position of the Core Strategy with regards to provision of housing will be reviewed when the housing targets in the South East Plan are finally approved. Until then the Council will make provision for the current allocations from the South East Plan. A Housing Delivery Action Plan will be prepared to set out the overall strategy, identify barriers to housing delivery and, potentially phase larger sites.

English Nature	Objective 1) EN supports the preferred option. However both options only specify variation in the amount of housing allocated within the Borough. The preferred option should also give information on how EEBC intend to allocate that housing and on how wildlife and protected species are to be safeguarded. Also a need to incorporate information on how the Council intends to protect designated sites from the impacts of development. All these factors need to be included in the Core Strategy and be subjected to a sustainability appraisal.	Specific sites for housing development will be identified in the Sites Allocations DPD. The Core Strategy sets out the broad locations for development. Policies are included to protect areas particularly valuable for their wildlife conservation.
Objective 2: Housing Development on Previously Developed Land		
MP	Preferred Option 2) The Local Plan needs to place clear restrictions on appropriate infill development where it is clearly detrimental to the surrounding area, either through over-intensity of development or through issues such as traffic growth	Noted. Policies encourage high quality inclusive design which complements the surrounding area, and minimises impacts on traffic congestion. Further policies containing guidance on this will be included in later Development Plan Documents
Ewell Downs Residents Association	Objective 2) Urban extensions are inappropriate. Good transport links are important	Noted. The Council's approach is to focus development in sustainable, built up locations
Highways Agency	Objective 2) Support development in urban areas, particularly where development is situated around key transport hubs that have the greatest potential to minimize the impact on the wider highway network. Would support the application of the sequential test for the development of new land use, as this will minimize the potential impact on the trunk road network. Out of town locations may generate more car trips	Noted. Views reflected in general principle of concentrating development in built up areas
Environment Forum	Objective 2) Agree with the preferred option but would like to see the wording altered to state: 'Focus housing development on previously developed land with good transport links'	The Core Strategy policy is line with these suggestions.
GVA Grimley on behalf of English Partnerships	Objective 2) The supporting text should recognize that PDL can (and does) include Major Developed Sites in the Green Belt. This has been an important source of housing supply in the District over recent years. St Ebbas and West Park are now available for development	The hospital sites are referred to specifically in the Core Strategy. The Site Allocations DPD will identify 'major developed sites'.
John Sharkey & Co on behalf of the University College for the Creative Arts	Objective 2) Alternative option: Given the Council is questioning the desirability of high densities (bullet point in preferred option); it would be useful to acknowledge that the rejection of this alternative will result in higher density developments in those parts of the Borough where development will be permitted.	Noted. In principle, the Council's strategy will be to direct higher density development to central locations, with lower densities being applied to other parts of the built up area.
Surrey County Council	Objective 2) Option is supported as the alternative would be contrary to both the SEP and SSP	Noted.
English Heritage	Objective 2) this could be broadened to include PDL and buildings. The stock of historic housing represents a substantial investment of resources. Retaining and reusing existing buildings reduces waste and increases resource productivity.	The section now refers to built up areas which would include historic buildings
Environment Agency	Objective 2) Support the preferred option, with the following proviso; PDL, which lies in the floodplain, should not have additional development which could increase flood risk in line with PPG25.	The Core Strategy specifies that new development should avoid increasing the risk of, or from, flooding. Further detail will be provided in later DPDs and SPDs.

Atkins on behalf of Mr R.L Shafter	Objective 2) Strongly disagrees with the preferred option. Do not agree with the presumption that there is sufficient PDL to accommodate the Borough's entire housing requirement within the plan period. The capacity of the Borough's urban areas to accommodate large numbers of housing could be significantly reduced by factors including residential amenity, local character, higher development costs, traffic impact and the need for larger affordable family accommodation on sometimes smaller plots. Without the results of a recent and thorough assessment of the availability of PDL or an assessment of the housing market it cannot be assumed that there is a sufficient amount of appropriate PDL. The preferred option should allow some flexibility for residential development in suitable greenfield locations. PDL should not always be the first choice for residential development as recognised in PPG3, paragraph 32. This is further stated in draft PPS3. All new sites should meet the following criteria: be available, suitable & viable. Strongly agree with the alternative option. It is likely that some well-connected greenfield sites will achieve a high level of sustainability and it is therefore important that the Core Strategy document recognises all of the potential sources of land that could meet future housing requirements in a sustainable way.	The Council is satisfied that the Borough can accommodate its South East Plan allocation within the plan period, from the development of the remaining hospital cluster sites and from sites within the built up areas. The 'Plan, Monitor, Manage' approach will ensure that targets are being met.
Objective 3: Affordable Housing		
Stamford Ward Residents Association	Objective 3) A difficult issue and the Borough is likely to be constrained by the PPS and the South East Plan. However, affordable housing is a tax on new housing and must therefore encourage higher house prices, which makes them less affordable, which is undesirable in Epsom and Ewell.	Noted. Requiring a percentage of new homes to be affordable is in line with Government policy and clear guidance enables developers to factor-in costs e.g. as part of land purchase.
Home Builders Federation	Objective 3) Premature to increase the affordable housing target / lower the threshold in advance of a full and proper HMA having been carried out and in absence of any assessment of viability implications and subsequent effects on overall housing supply	The Housing Needs Study (conducted in 2004) has informed the development of this section and the policy is in line with the requirements of the South East Plan. The Council will, negotiate on individual schemes and take into account the individual characteristics of the site and other circumstances An SPD will contain further details.
Royal Borough of Kingston Upon Thames	Objective 3) The provision of sufficient affordable housing is a very important issue in the South East, especially in those areas that border London Boroughs. It is important that the authorities in the South East all contribute towards providing adequate affordable housing	Noted. The policy is in line with the South East Plan requirements
College Ward Residents Association	Objective 3) We must increase the availability of affordable housing within the Borough	Noted. The policy will help to achieve this.
RPS on behalf of Fairview New Homes Ltd	Objective 3) FNH consider that setting specific targets would be unjustified. Guidance in Circular 6/98 clearly states, policies for affordable housing should set 'indicative' targets for specific sites and that the level should be negotiated having regard to site specific circumstances. Request that the level of affordable housing in schemes is determined with regard to individual site characteristics (such as site costs, constraints etc) as well as financial viability. PPG3 confirms that these issues should be taken into consideration.	Government advice requires policy wording to be detailed in the submission stage of the Core Strategy. The Core Strategy refers to site characteristics and viability issues. An SPD will set out further details of the affordable housing definitions and requirements.

John Sharkey & Co on behalf of the University College for the Creative Arts	Objective 3) No specific percentages or thresholds are set out. Not giving consultees the chance to comment until the last stage. The Council could take this opportunity to confirm that purpose built student residential accommodation falls within the definition of affordable housing so far as this document is concerned. The University College is not asking the Council to give priority to this development, but rather acknowledge that if a scheme were to come forward offering student accommodation as the affordable housing element of a larger scheme, this would be acceptable to the Council.	Noted. Thresholds and percentages are included in the policy. Further details will be set out in the SPD
Surrey County Council	Objective 3) This reflects the approach in the SSP and is in line with PPS3. The Council should consider the approach being proposed in Runneymede and Woking, requiring on-site provision of affordable housing on sites over 15 dwellings, but seek a commuted sum on all housing sites under 15 dwellings. This approach is supported by the Knight Frank report into the Economics of Affordable Housing in Surrey. The alternative option is rejected.	Noted.
Member, Surrey County Council	Objective 3) Too much affordable housing will change the character of Epsom which is not what residents want	Noted. Design policies will ensure that all aspects of a new development positively contribute and enhance the environment.
The Planning Bureau Limited on behalf of McCarthy & Stone	Objective 3) McCarthy and Stone support the need to deliver affordable housing within the Borough but ask the Council to consider carefully the site size threshold it would seek to recommend together with the percentage of affordable housing in order that the flow of land for redevelopment is not stifled. It is important to consider the viability of developments where, given that most of the land will be already in existing use with substantial existing use values, the requirement for affordable housing should not stifle the redevelopment of such sites. Would therefore object to the lowering of thresholds on windfall sites compared to allocated sites on the proviso that such may well restrict the flow of windfall opportunities within the Borough to deliver all forms of housing needs. The issue of site viability is raised in draft PPS3.	The Council has considered this issue carefully. In view of the limited potential land supply, the lowest reasonable threshold for securing affordable housing has been selected. The Core Strategy refers to site characteristics and viability issues.
Atkins on behalf of Mr R.L Shaffer	Objective 3) Agree with the preferred option as this approach is broadly consistent with Planning Circular 06/98. Draft SEP policy H4 echoes this guidance. It is possible that the provision of affordable housing in the Borough could be greatly facilitated by other initiatives. One such initiative would be to include the planned release of larger sites which will meet and exceed the current threshold (without the need for off-site affordable provision). The allocation of larger sustainable sites could enable the development of a greater mix of housing sizes and tenures.	Noted.
Objective 4: Housing Densities		
Epsom Protection Society	Objective 4) Add to preferred Objective 'provided developments are not in conflict with the character of the surrounding area'	Design policies will ensure that all aspects of a new development positively contribute and enhance the environment and that development is appropriate for its context
Mole Valley & Epsom Green Party	Objective 4) The necessity to increase housing density in order to preserve the Green Belt from development should be shared equally among all situations in the Borough, not just central locations.	Noted. However, in sustainability terms it is more desirable to build at higher densities in accessible, central locations.

	Objective 4) Disagree with high densities as people in the 21st Century should not be living on top of one another (bad for health), also there is a lot of land that is not being worked since cutting down the farming community	Good design is an important factor helping to mitigate any negative impacts from high density living. Quality design is an important focus of the Core Strategy. An appropriate level of provision of open space can also help mitigate impacts
Stamford Ward Residents Association	Objective 4) Not every available site is suitable for high density or redevelopment; e.g. much of Stamford Ward would be environmentally damaged. The housing stock should continue to offer variety including relatively low density. Some 'suitable sites' (whatever this means) are suited to lower densities	A Design policies will ensure that all aspects of a new development positively contribute and enhance the environment and that development is appropriate for its context
Sport England	Objective 4) Building at higher densities will minimize take up of greenfield / open space sites. This should not be at the expense of valuable urban open space e.g. playing fields	Noted. Open playing spaces are protected in the Core Strategy
Highways Agency	Objective 4) New developments focused within existing centralised locations tend to be the most sustainable in transport terms as it is likely there is an established, sustainable transport infrastructure in place.	Noted
Environment Forum	Objective 4) Agree that housing density should be high in town centres. Have mixed opinions about whether housing density in other developments - less close to the centre of town - should be high. High densities are economical of land, and can assist with energy conservation and cost effective use of services. However, they can cause town cramming, excess traffic, crowding and loss of local character.	Noted. Good design will play an important role in helping resolve these issues
RPS on behalf of Fairview New Homes Ltd	Objective 4) Support an option that would seek to maximize housing densities, in some cases above 50 dwellings per hectare to maximize and efficiently develop the use of land as well as to meet government housing targets.	Noted
GVA Grimley on behalf of English Partnerships	Objective 4) If the Council is to focus high density housing in town centres and sustainable locations, then a 'sustainable location' needs a relatively detailed definition for the policy to work effectively	Sustainable locations are now more clearly defined in policies and supporting text
Surrey County Council	Objective 4) Neither the preferred or alternative option address the issue adequately. To accord with the SSP, SEP and government guidance, the LDF needs to encourage densities between 30 and 50 dwellings per hectare across the urban area, with higher densities in town centres and sustainable locations. While higher densities may offer more opportunities to require affordable housing, higher density developments might not be suitable for on-site provision of affordable housing in that the size of units may not meet the need profile.	In principle, the Council's strategy is to direct higher density development to central locations, allowing for lower densities in other parts of the built up area. The Council will negotiate with developers to ensure that affordable housing provision will meet the housing need.
The Planning Bureau Limited on behalf of McCarthy & Stone	Objective 4) Support the provision of higher density housing in town centres and sustainable locations subject to the criteria that such a development should meet the requirements of PPS1 in terms of its design and impact upon the character of existing areas and uses	Noted
Atkins on behalf of Mr R.L Shafter	Objective 4) Strongly disagrees with the preferred option. Allowing high densities in all new residential developments is not consistent with national policy guidance. A blanket approach to high density would in some cases be unsympathetic to local landscape and built character. Also strongly disagree with the alternative option.	The policy does not take a 'blanket approach' to density levels but allows a more flexible approach within the policies and principles described elsewhere in the Core Strategy. In principle higher densities are to be directed to more sustainable locations.

Objective 5: Range of Housing		
Home Builders Federation	Objective 5) It is developer's who take all the risks associated with delivering sites for development. Whilst LA's may seek to influence development on a site through negotiation they should not dictate or prescribe mix to developers unless they are willing to compensate developers for the additional risk of possibly providing dwellings consumers do not want	Noted. The Council will negotiate with developers as to the mix of housing within the context provided by the Core Strategy and Local Housing Needs Assessment
Royal Borough of Kingston Upon Thames	Objective 5) It is also very important that housing provided is suitable for local needs, not just within the local authority area but within the entire region. Some areas will require smaller units, others will need more family sized dwellings	Noted.
Environment Forum	Objective 5) Developers need to be encouraged to produce what is needed locally, not merely what sells for the greatest profit.	Noted.
RPS on behalf of Fairview New Homes Ltd	Objective 5) In terms of specifying mix, FNH considers that LPA's should not have significant influence on this important commercial issue. The objection relates to the potential control of the type and size of private housing. The concept imposes wholly unacceptable, unjustified & unprecedented level of control on the house building industry for a number of reasons: 1) It takes away the ability of the private sector to respond to market demands (the need for responsiveness was highlighted in the Barker report) 2) It erodes the ability of the private sector to appropriately assess market demand in an area & respond with innovation and initiative 3) It takes away the ability of house builders to assess the viability of individual schemes, completely undermining the economics of supply & demand. Complex decisions are handed to LPAs who are not in the best position to make such decisions 4) If sizes & types of housing are specifically defined in a policy in a LDD there is limited scope to react or respond quickly to the changes in the market 5) There are already policies in development plans that seek a broad mix of housing on certain sites. There can be no justification for imposing further controls.	Noted. The policies do not define specific dwelling mixes. The Council will negotiate with developers as to the mix of housing within the context provided by local Housing Needs Assessments and other policies within the Core Strategy.
Surrey County Council	Objective 5) Policy options should also include specific recognition of the ageing population and the need for sheltered / extra-care housing and for a proportion of all housing to be built to Lifetime Homes standards. In order to help meet the need for more extra care housing identified by the Mid Surrey Extra Care Housing Strategy Group options could look to re-modelling or redeveloping some of the Borough's current surplus and outdated sheltered housing stock. There is also a need to address needs for gypsy and traveller groups in line with Circular 01/2006 although it will be for the SEP to consider traveller pitch requirements per district, based on local housing needs assessment (County Council is working jointly with Districts looking at provision and needs on a countywide basis). The alternative option is not supported.	Housing needs include those of the elderly; this is particularly relevant to the Borough which has an ageing population. A section for the housing needs of gypsies and travellers has been introduced.
The Planning Bureau Limited on behalf of McCarthy & Stone	Objective 5) The Housing needs survey 2004 highlighted the significant increase in the retired population by 2021 and therefore the Core Strategy should provide a policy aspiration to meet the needs of a significant element of the population in terms of new specialized development for this age group	Noted. The needs of the ageing population are specifically mentioned.
Atkins on behalf of Mr R.L Shafter	Objective 5) Strongly agree with the preferred option as this is in line with policy H6 of the draft SEP.	Noted.

Employment Comments		
Resident	Objective Employment) Agree with preferred options although some centres within Epsom and Ewell need some revitalization. There is scope for the injection of more both small and large businesses	The Core Strategy provides for regeneration of employment areas and for the development of additional floorspace.
Surrey County Council	Objective employment) Options are broadly supported. Mixed use redevelopment should be encouraged in and around town centres with some employment use retained. The issue should be whether the loss of employment land at sustainable locations is acceptable and where losses occur, the aim should be to retain some employment use. Objective 7) should be amended to reflect this. The identification of Nonsuch Business Park in the Surrey Waste Plan Preferred Option 2005 as a potential site for accommodating waste development should be acknowledged.	Mixed use developments are promoted although the loss of employment land in sustainable locations is resisted. This is in line with the Council's Employment Land Review. The Nonsuch business park is referred to.
Local Committee for Epsom and Ewell	Objective Employment) The Surrey Waste Plan Preferred Option 2005 refers to Nonsuch Business Park as a potential site for accommodating waste development. Any reference in the LDF should refer to the more general Kiln Lane industrial area.	Both the Nonsuch Business Park and the Kiln Lane area are mentioned.
Objective 6: Maintain Mix of Employment Uses		
Home Builders Federation	Objective 6, 7 & 8) Paragraph 42A of PPG3 requires authorities to adopt a flexible approach to re-use of employment land. Specially designated areas should only be protected to a degree in accordance with the weight of the designation. They should not all be treated as of equal importance.	The policies have been designed to be flexible whilst achieving protection of the desired amount of employment floorspace.
Highways Agency	Objective 6, 7 & 8) HA is generally supportive of an approach whereby every effort is made to balance the provision of homes and employment either through the strategic location of development sites or through the identification of sites with the potential for mixed use. Also support home working.	The Council is supporting 'smart growth' which includes initiatives such as home working. Employment sites in the most sustainable locations are offered protection.
John Sharkey & Co on behalf of the University College for the Creative Arts	Objective 6) Would be useful to provide a definition of 'employment uses'. On the assumption that the Council's definition is the traditional one, this seems not to accord with government guidance in 'Employment Land Reviews: Guidance Note 2004'	The employment section has been informed by the Council's Employment Land Review, which relates to B1, B2 and B8 floorspace. However, it is also noted that many employment opportunities within the Borough are offered within the education, healthcare, retail and hospitality industries.
John Sharkey & Co on behalf of the University College for the Creative Arts	Objective 6) Alternative Option. While the University College support this, it seems there is a tension between the preferred options in different parts of the document. On the one hand the Council does not want to build on Green Belt land, yet seems to have concerns with new development being at higher densities. To keep densities at more 'acceptable' levels, the re-use of employment land that is not demanded could help achieve this.	The policy is flexible, allowing for some losses of employment land while protecting those sites in the most sustainable locations.
Objective 7: Protect and Preserve Well Located Employment Sites		
Government Office of the South East	Objective 7) Assume that the approach to protect and preserve well located employment sites in sustainable locations is underpinned by an up-to-date review of employment land?	A Employment Land Review has been conducted
King Sturge on behalf of Helical Bar Plc	Objective 7) This policy represents a blanket restriction across all employment uses, it should just relate to identified employment sites	The policy does not provide blanket protection to all employment sites. It is flexible allowing for losses whilst providing protection to sites

		in sustainable locations.
Objective 8: Support New Working Methods		
Highways Agency	Objective 6, 7 & 8) HA is generally supportive of an approach whereby every effort is made to balance the provision of homes and employment either through the strategic location of development sites or through the identification of sites with the potential for mixed use. Also support home working.	The Council is supporting 'smart growth' which includes initiatives such as home working. Employment sites in the most sustainable locations are offered protection.
Government Office of the South East	Objective 8) Support this objective as it should reduce traffic congestion and the need to travel by private car. This is consistent with PPS1 and PPG13	Noted
Environment Forum	Objective 8) This option is supported as it will reduce the need to travel as well as providing more custom for local services	Noted
GVA Grimley on behalf of English Partnerships	Objective 8) While a policy regarding new working methods is supported, it is important for any fixed requirement for live-work units (such as percentage of new housing schemes) to be justified by a strong evidence base that such units are needed. It is also important to specify exactly what constitutes a live-work unit as definitions vary across the country.	The Core Strategy does not introduce a fixed requirement for live / work units. Definitions and examples will be provided in Supplementary Planning Documents.
Atkins on behalf of Mr R.L Shafter	Objective 8) Strongly agree with the preferred option which is in accordance with policy RE5 of the draft SEP	Noted

Natural Environment Comments		
Resident	Objective Natural Environment) Strongly support the preferred options	Noted
EEBC Employee - Tree Officer	Objective Natural Environment) Feel this section is a little weak in promoting the landscape quality of the Borough. The Community Strategy and the Council's Key Priorities include improving the visual appearance of the Borough and improving the quality of the life for people who reside and work here. There are currently specific objectives to protect Open Space and the Green Belt, although landscaping within our townscape seems to have been omitted. Towns are essentially an artificial environment and quality landscape helps to humanise this, for example limiting some of the harmful aspects such as air and noise pollution. Feel we need to bolster this aspect with an objective that seeks to enhance and improve the aesthetic value of the landscape, which will then become a greater consideration in development.	The importance of the quality of the landscape is now referred to. It is recognised that this plays an important role in defining the character of the Borough and forms part of the policy relating to the quality of the built environment.
Objective 9: Control Over Green Belt Boundaries		
College Ward Residents Association	Objective 9) Must protect the Green Belt at all costs. Hence College Ward's RA's high profile opposition to commercial building on South Hatch racing stables (to finance improvement at the stables) which are in the Green Belt	Noted
Sport England	Objective 9) In general the Green Belt is a valuable recreational resource. However, the policies should not prevent the provision of supporting infrastructure which supports the recreational use of the Green Belt e.g. pavilions, changing rooms etc	It is recognised that the Green Belt is a valued recreational resource. The policy does not preclude development within the Green Belt, although this will be strictly controlled in line with Government policy. Details of this will be contained in later Development Plan Documents.
Barton Wilmore Partnership on behalf of the Racecourse Holding Trust	Objective 9) Object to this option in so far as it applies to EDR. RHT consider that the Epsom Downs Racecourse is a Major Developed Site and should be defined as such, in accordance with paragraph C1 of PPG2 in that it pre dates the introduction of the Town and Country Planning Act and the Green Belt designation and is a large site. It is also comparable to some of the examples of major developed sites given in PPG2. RHT consider that EDR will be subject to redevelopment proposals, refurbishment and potential extension, infill or rationalisation over the lifetime of the CS. Feel that developments at the racecourse would be in accordance with Para C3 of PPG2 which, to secure jobs and prosperity, allows LPAs to identify the site, defining the boundary of the present extent of the development and setting out a policy for limited infilling for the continuing use within this boundary. RHT are aware that a similar approach has been taken at Wolverhampton racecourse where it has been removed from the Green Belt.	The Site Allocations Development Plan Document will identify the 'major developed sites' within the Green Belt

GVA Grimley on behalf of English Partnerships	Objective 9) Important that policies are provided for Major Developed Sites in the Green Belt where there is a principle acceptance that redevelopment is not inappropriate if certain criteria are satisfied. It is currently stated that developments will be expected to be of an 'exceptional standard' - this goes beyond the requirements of PPG2. Design quality and energy efficiency should be an objective of all development, not just schemes in the Green Belt. Objective 16 reflects the latter approach so there should not be an additional reference in the Green Belt chapter. In the supporting text for the alternative option, the term 'urban areas' should be replaced by 'brownfield land' since a large part of the District's housing requirement has in the past, and is expected in the future, to come forward on Major Developed Sites in the Green Belt Hospital Cluster which are not 'urban'.	The Site Allocations Development Plan Document will identify the 'major developed sites' within the Green Belt. Design quality and energy efficiency are objectives of all development. The document now refers to 'built up areas'.
Environment Agency	Objective 9) Strongly supported. Should also encourage the redevelopment of PDL	Noted. Development is to be focussed on previously developed land.
Atkins on behalf of Mr R.L Shafter	Objective 9) Strongly disagree with the preferred option as this approach does not allow for selected Green Belt releases in sustainable locations where there is an identified housing need. This is not consistent with policy BE4 of the draft SEP. PPG2 recognises the valuable role of the Green Belt and policy CC10 of the draft SEP supports their retention. However the draft SEP also states that there may be cases where small scale Green Belt releases are appropriate and this should be pursued through the LDF process. Atkins considers there is justification for review of the Green Belt boundary around Epsom due to the current uncertainties regarding the availability of 'suitable' and 'economically viable' PDL becoming available from appropriate forms of residential development over the Plan period. The availability of PDL for new housing will also be reduced by the need to safeguard land for continued or future employment uses. This approach would also be generally consistent with PPG3 which recognises that there may be a strong requirement to revise some Green Belt boundaries in the interests of sustainable settlement growth. Therefore strongly agree with the alternative option.	Releases of Green Belt land for development are not necessary and the alternative option was rejected.
Objective 10: Provide and Protect a Suitable Quantity and Quality of Open Spaces		
RPS on behalf of Fairview New Homes Ltd	Objective 10) Contributions should be relevant, necessary and directly related to the development in planning terms. They should be assessed on a case by case basis and it must be demonstrated that there would be a need for contributions as a result of a proposed development.	Noted. A policy now relates specifically to open space contributions has been informed by the Council's Open Space Audit and further details will be set out in a Supplementary Planning Document.
John Sharkey & Co on behalf of the University College for the Creative Arts	Objective 10) The reference to 'residents, workers and visitors' should be extended to include those who study in the Borough. While the University College supports provision of infrastructure generally, this policy dealing with open space would be more effective if it were clearly based on proven need.	Noted

The Planning Bureau Limited on behalf of McCarthy & Stone	Objective 10) Object to the quote that 'all proposals for new residential development should be required to make a contribution to the provision of new or improved open space, outdoor sport and recreational facilities'. Such an objective would be wholly contrary to Circular 05/05 and PPG17 especially when one considers the potential impacts on infrastructure by specialized groups such as the elderly or the disabled. It is suggested that this paragraph is amended to provide flexibility in such requirements for housing designed for specialized groups.	Noted. The Open Space and Recreational Facilities SPD will set out specific requirements.
Environment Agency	Objective 10) Support the preferred option. The provision of open space and public access must be balanced with the need to protect wildlife. It is important to recognise that open spaces can have a multi-functional role in terms of providing green space for recreation purposes, amenity value and enhancing biodiversity. Open spaces can accommodate vast numbers of the public, but care must be taken to incorporate wildlife refuges and areas free from access. This ensures the integrity and function of the local wildlife, especially along river corridors which by their nature are susceptible to intrusion. New parks could be positioned where possible to form a missing link between existing parks. It is important to consider the role of parks and new open spaces with regard to their potential to help attenuate storm water run off through SUDS schemes as well as providing flood storage space when planned effectively to fit in with river restoration schemes. This is of particular importance in this Borough due to the presence of a number of rivers with stretches that have been identified as potential sites for river enhancement or restoration. This is outlined within the South London River Restoration Strategy and it would be useful to reference this document within the LDF.	Noted. The open space audit is instrumental in helping to inform policies. The Council is supporting Green Arc initiatives which will help to improve the management and accessibility of the Green Belt, bearing in mind the variety of functions it has. The South London River Restoration Strategy is now referred to.
English Nature	Objective 10) EN supports the preparation of a new SPD to create new open space and when designing the document, care should be taken to follow the guidelines in PPS17. EN have produced their own guidelines for accessible natural green space and recommend that EEBC, like many other authorities, incorporate these targets into their Local Plans. Furthermore opportunity should be sought within new development schemes to enhance the condition of designated sites, ancient woodland, BAP habitat and the quality of river catchments.	Noted. Opportunities to improve biodiversity / habitats from new developments will be sought and specific requirements will be included in forthcoming SPDs.
Objective 11: Protect and Enhance Areas that are Nationally, Regionally or Locally Designated as Sites of Nature Conservation Interest		
Surrey Wildlife Trust	Objective 11) Ancient semi-natural woodlands should be included in policy wording (see PPS 9 section 10)	Ancient woodlands are now included in the policy wording.
Ewell Downs Residents Association	Objective 11) Use alternative designation to avoid confusion with SNCI	Sites that are designated are now clearly distinguished
Sport England	Objective 11) Some development which supports recreational activities in the countryside where there may also be nature conservation issues should be permitted. Activities may include fishing, riding, water based sports etc	Noted. The need for a proposed development will be weighed against the area's importance for nature conservation
Environment Forum	Objective 11) Feel the last word should be changed from 'nature conservation interest' to 'nature conservation importance'	The importance of a site for its nature conservation interest has been referred to in the policy

John Sharkey & Co on behalf of the University College for the Creative Arts	Objective 11) It would be useful for the Council to produce an initial Proposals Map at this stage	A Key Diagram has been produced. The detailed boundaries of designated areas will be defined in the Site Allocations Development Plan Document and proposals map.
Environment Agency	Objective 11) Strongly support this option. Support the protection and enhancement of designated areas and the significance of PPS9, which is complemented by Objective 13	Noted.
English Nature	Objective 11) The commitment to protect and enhance designated sites is welcomed, however further clarification is required on the policies which would 'be introduced to distinguish between designations'. The Council's statutory duties towards designations SAC, SPA, SSSI & SNCI are laid out in law. the enhancement of designated sites could be achieved through working with the Surrey Wildlife Trust. EN are happy to provide periodic (e.g. annual) updates on the condition of the Borough's SSSIs.	The policy provides some information as to the level of protection afforded to the designated sites. Further more specific detail will be contained in a later Development Plan Document. The Council will work with Surrey Wildlife Trust to ensure the designations are correct and the sites managed appropriately.
Objective 12: A Risk Based Approach to Development in Flood Risk Areas		
Mole Valley & Epsom Green Party	Objective 12) Climate change will increase the flood risk considerably. Epsom road drainage systems are a disgrace at present. What does the future hold?	The issue of flooding is covered in a policy referring to sustainability in new developments. This will ensure that new developments do not increase the risk of flooding, effectively manage the water resource (for example through sustainable urban drainage systems) and that the necessary infrastructure required by a new development is adequately provided for.
Environment Forum	Objective 12) Measures should be taken to reduce flooding, including the prevention of water drainage problems from the tarmacing of front gardens	Noted. Developments are required not to increase the risk of flooding. Further guidance will be included in later Development Plan Documents.
Environment Agency	Objective 12) Strongly support the preferred option. The protection of floodplains is important. An 8 meter buffer zone must also be maintained from main rivers within the district which are namely the Hogsmill, although three of the Hogsmill tributaries are due to become main rivers with their urban catchment in April 2006	Noted. The creation of a buffer zone is now mentioned.
Objective 13: Seek to Protect Important Habitats and Species & Provide Opportunities to Enhance Biodiversity		
Surrey Wildlife Trust	Objective 13) Recommend that an ecological survey should accompany any planning application that could affect a known site of nature conservation interest or green field site. Up to date surveys should be carried out to support this policy. Is Epsom and Ewell aware of the Surrey Biodiversity Action Plan? Welcome the intention to develop a local BAP, the biodiversity officer at Surrey Wildlife Trust would be able to assist with this - Sue Webber	Noted. The option for requiring ecological surveys has been provided for. The Epsom and Ewell Environment Forum is in the process of producing a Local Biodiversity Action Plan.
Environment Forum	Objective 13) Support the option but would like the wording changed to read 'To protect important habitats and species, and maintain and enhance biodiversity'	The policy has been worded to provide for the maintenance and enhancement of biodiversity.

<p>Environment Agency</p>	<p>Objective 13) Strongly support the preferred option. Although the EA recognises the need to use and develop brownfield sites, the loss of this important habitat should be mitigated for, for example by the provision of green roofs. Some sites such as car parks or other sites entirely covered in hard standing may have a lower nature conservation value and should be targeted first for redevelopment. The aim to integrate biodiversity into developments e.g. through section 106 agreements is encouraging. This could be achieved by including natural features within developments such as bird or bat boxes, the creation of new habitats (e.g. ponds, wetlands) and green / brown roofs. PPS9 should steer this objective, as well as objective 11. Green buffer strips are sought alongside watercourses. Where such a buffer strip does not currently exist, we normally seek that it is established. These serve a number of purposes.</p>	<p>Noted. The policy requires development to contribute positively towards the Borough's biodiversity, which may include measures such as green roofs. Issues such as these will be dealt with in an SPD. The Council will aim to integrate biodiversity features into new developments wherever possible.</p>
<p>English Nature</p>	<p>Objective 13) The recognition of biodiversity is welcomed. EN have drafted a list of suggested LDF Biodiversity indicators for Sussex and Surrey. (Refer to comments for full list). EN agrees that brownfield sites can be extremely valuable for wildlife and that planning decisions should always be based on rigorous surveys carried out by a qualified ecologist. It should be noted that Section 106 agreements should not be used to obtain these surveys and the onus is on the developer to provide the survey and any mitigation with the planning application. In DC, a specific policy which sends out a checklist to all potential planning applicants with simple criteria identifying when a protected species survey is likely to be required prior to an application. A policy should be instated that the planning documents will not be accepted without a correct survey if one is identified on the planning checklist. If protected species are present, EN should be consulted. Objective 13 should also refer to ancient woodlands as EEBC has an unusually high veteran resource. These trees should receive specific protection in the LDF. Where appropriate, woodland in the Borough should be managed as a wood fuel resource, which will help to fulfil the Council's renewable energy responsibilities and also improve biodiversity within the woodland.</p>	<p>Noted. The option for requiring ecological surveys has been provided for in policy. Ancient Woodlands are now specifically mentioned.</p>

Urban Design and the Built Environment Comments		
Resident	Objective Urban Design) Support the preferred options. Epsom and especially Ewell are in danger of losing their historical character. There is an urgent need to preserve their heritage	An overriding goal of the Core Strategy is to conserve, protect and enhance the quality of the built environment. This is reflected throughout the policies.
Objective 14: Seek to Protect and Enhance Conservation Areas and the Setting of Listed Buildings		
Epsom Protection Society	Objective 14) Suggest re-wording 'Seek to protect and enhance Conservation Areas and listed buildings and their settings'. In points for consideration 'Consider how to strengthen the protection of areas and buildings etc..'	Protecting the settings of such areas is considered important and is now mentioned in the policy wording.
Ewell Downs Residents Association	Objective 14) Include listed buildings as well as settings	Noted
Objective 15: Provide Appropriate Protection for Sites of Archaeological Importance		
Epsom Protection Society	Objective 15) Hope that the present practice of examining new developments for archaeological remains will be continued	Noted. Policies providing for this will be included in the Development Control Policies DPD
Surrey County Council	Objective 15) Needs to include a requirement for archaeological assessment and possibly evaluation prior to development on all sites over 0.4ha in size and include provision for investigation and recording regimes, should preservation of remains not be possible or reasonable.	Noted. Policies providing for this will be included in the Development Control Policies DPD
Objective 16: Ensure all Aspects of New Development Complement and Positively Contribute to the Character of the Area		
Mole Valley & Epsom Green Party	Objective 16) The Green Party supports Friends of the Earth 'Big Ask' campaign to stop climate change by promoting 'zero carbon emission regulations for new developments. 'Big Ask' literature attached to comments detailing what should be included in LDFs. Recommends; the adObjective of a zero waste & zero carbon standard, minimum of EcoHomes 'excellent', minimum of BREEAM 'excellent', the development of onsite renewable energy generation capacity.	Sustainability is a core issue throughout the Core Strategy. A policy relating to sustainability in new developments has been included with further details to be set out in an SPD.
Sport England	Objectives 16, 17, 18 & 19) Sport England supports well designed communities. Of particular concern is the integration of sports and recreational facilities into the community which provide attractive, safe and convenient locations for recreation. Refer Council to Sport England Guidance on this 'Active Design'	Noted. Developer contributions will be sought to provide for recreational facilities. Where possible, such facilities will be included within a new development where there is an identified need. The Core Strategy places an emphasis on the quality of design.
Environment Forum	Objective 16) Believe the retention of the character areas of the Borough is of great importance. This should not be lost merely to meet excessive housing targets	Noted. Policies reflect the importance the Council places on protecting the character and appearance of the Borough.

Objective 17: Use Good Design to Incorporate a Variety of Sustainable Elements and Principles into New Developments		
Epsom Protection Society	Objective 17) A slavish following of efforts to conserve energy should not conflict with good design and appearance	Noted.
Stamford Ward Residents Association	Objective 17) High sustainability standards should be a requirement. West Park in this ward is due to be developed; this sort of development should lead the way for future sustainability needs	The Council is committed to sustainable development. The Core Strategy requires that proposals for development should result in a sustainable environment. Further details will be set out in an SPD.
Ewell Downs Residents Association	Objective 17) Design Guide essential and needed	Noted. The Council will provide further design guidance to help create better environments
Sport England	Objectives 16, 17, 18 & 19) Sport England supports well designed communities. Of particular concern is the integration of sports and recreational facilities into the community which provide attractive, safe and convenient locations for recreation. Refer Council to Sport England Guidance on this 'Active Design'	The policy applies to all facilities
Barton Wilmore Partnership on behalf of the Racecourse Holding Trust	Objective 17) Object to this option for the reasons included under 'points to consider'. Therefore the alternative option is supported.	This relates to the viability of schemes. The Council will examine such issues on a case by case basis.
Environment Forum	Objective 17) Strongly supported but remove the wording 'Aim to'. When the new Code for Sustainable Homes is introduced, EEBC should be seeking a standard better than their 'minimum' for every new building. This needs to be mandatory and not something that developers are merely encouraged to do	The wording of the policy seeks that proposals for new developments should result in a sustainable environment. The policy applies to all developments and further details will be set out in an SPD
RPS on behalf of Fairview New Homes Ltd	Objective 17) Whilst it is correct that energy and sustainable issues are considered, they should not stifle regeneration. Such initiatives impose an additional cost on developers and together with the section 106 requirements this could make some schemes unviable. The option should make it clear that such sustainability measures are encouraged by the Council rather than imposed on the developer.	It is important that all development contributes in some way towards combating and adapting to climate change. The Core Strategy establishes the basic policy. Further details will be set out in an SPD.
GVA Grimley on behalf of English Partnerships	Objective 17) The incorporation of sustainable elements and principles into new developments is supported, however, it is important these are not set so high as to make schemes on marginal sites unviable. Policies will need to be carefully worded.	It is important that all development contributes in some way towards combating and adapting to climate change. The Core Strategy establishes the basic policy. Further details will be set out in an SPD.
John Sharkey & Co on behalf of the University College for the Creative Arts	Objective 17) The explanatory text states that 'developments of a certain threshold may be required to produce a sustainability statement'. The threshold should be defined in this document.	It is intended to produce an SPD which will contain more detailed information

Surrey County Council	Objective 17) Where possible, the Borough Council should aim to adopt the higher EcoHomes/BREEAM 'excellent' standard. There should be specific reference to SSP policy SE2 (Renewable Energy and Energy Conservation) 10% renewable energy requirement. The supporting text should emphasise that the objective in reducing power consumption is to reduce the carbon burden and contribute to tackling climate change.	It is intended to produce an SPD which will contain more detailed information.
King Sturge on behalf of Helical Bar Plc	Objective 17) Alternative option. Agree that the policy should be flexible to recognize that the use of renewable energy is not appropriate in all development proposals and that other methods to reduce carbon emissions may be more effective.	Noted.
Environment Agency	Objective 17) Support the preferred option. With increasing development there will have to be a greater emphasis on SUDS - all new developments should be incorporating aspects of SUDS. Restriction of discharge flows to that of pre-development flows for both greenfield and brownfield sites is essential in order to ensure there is no increase in surface water flooding. Redevelopment of existing brownfield sites should ensure that a nominal reduction in flow from the site is achieved.	Sustainable urban drainage is mentioned specifically in the policy. It is also required that new developments avoid increasing the risk of, or from, flooding
Atkins on behalf of Mr R.L Shafter	Objective 17) The alternative option places less emphasis on the role of design in achieving the widespread incorporation of sustainable elements into new developments, but could still be a viable option if accompanied in the LDD's by relevant design guidance and strategies for achieving these aims. Therefore strongly agree with the preferred option and agree with the alternative.	The design of new developments is considered important. An SPD will contain more detailed information.
Objective 18: Aim to use Good Design to Help Create Safer Environments		
Sport England	Objectives 16, 17, 18 & 19) Sport England supports well designed communities. Of particular concern is the integration of sports and recreational facilities into the community which provide attractive, safe and convenient locations for recreation. Refer Council to Sport England Guidance on this 'Active Design'	Noted

Transport and Infrastructure Comments		
Resident	Objective Transport and Infrastructure) Whilst supporting the preferred options there is a need for improvements to the maintenance of roads. Current parking facilities are hardly adequate. The need for traffic calming measures has always been an important issue.	Surrey County Council is responsible for road maintenance issues. The Council will maintain effective working links with the County Council. Developers will be required to contribute towards highways issues where there is an identified need.
Local Committee for Epsom and Ewell	Objective Transport and Infrastructure) It is very important that the Core Strategy has regard to the cumulative impact of small scale developments.	Noted. This has been taken into account and specific references to this are made.
Objective 19: Encourage Non-motorised Form of Travel		
Epsom Protection Society	Objective 19) Traffic congestion is highlighted as a significant problem and despite Objective 19, it is predicted that car usage will increase leading to further congestion. Therefore suggest within the 'Transport and Infrastructure' Objectives an additional Preferred Objective entitled 'Seek to reduce traffic congestion in Epsom Town centre'. The measures to support this could include 'Encourage non-motorised forms of travel' and 'productive discussions between Borough and County Councils either to increase traffic flows or to redirect traffic from the High Street'	The section recognises that traffic congestion is a significant problem and the policy seeks to ensure that new development will not add to this problem and will encourage more sustainable forms of transport. The relationship between Epsom and Ewell Borough Council and the County Council has been highlighted with a commitment to joint working. The second Local Transport Plan identifies reducing traffic congestion as a main priority. Reference is made to the Kiln Lane link
Mole Valley & Epsom Green Party	Objective 19) Regarding provision of cycle paths, these should be extended around roundabouts. The parking of cars on cycle paths should also be prohibited - Ashley Road on a Sunday is a bad example. Imposing a congestion charge in Epsom would reduce traffic. The size of commercial lorries should be restricted to a lower level. Political action to increase tax on cars and petrol and to introduce free public transport would help. Cancel hypermarket.	Noted. Many of these issues are the responsibility of the County Council as Highway Authority. However, in partnership with the County, the Borough Council will strive to ensure that new development will not increase traffic congestion and will actively promote more sustainable means of transport. Policy CS 19 specifically refers to joint working opportunities
-	Objective 19) You can encourage other forms of travel, but the car is here to stay	Noted.
Resident	Objective 19) Please note: Lack of public transport - bus services run as commercial services, not public services; costs of bus services - often high, cheaper to use the car; low levels of service - frequently one or two hours between buses; frequently no service after 7pm, Sundays and Public Holidays; Total lack of night bus services. Other comments as to the bus services that should be reintroduced.	Noted. Comments passed to County Council
Age Concern Epsom & Ewell	Objective 19) Strongly agree to the provision of non-motorised transport because many older people can no longer drive and are absolutely dependent on public transport.	Noted.

Home Builders Federation	Objective 19) While alternatives to motorised transport should be encouraged, this should not be the sole focus of transport policy. Will still need to plan and make provision for the car and lorries etc but alongside alternatives. Balance is lacking in the way the question is phrased.	Noted. The second Surrey Local Transport Plan aims to create a sustainable transport system, managing the demand for travel and getting the best out of the existing transport network
Royal Borough of Kingston Upon Thames	Objective 19) An Objective missing from the transportation issues is the need to improve public transport provision, especially improving services linking residents with jobs and major trip generators such as shopping and leisure attractions, both within and beyond the Borough	Noted. The aim of the Core Strategy is to focus development within the urban areas in sustainable locations. Where appropriate, developer contributions will be sought towards public transport provision and facilitating alternative means of transport
Sport England	Objective 19) Non motorised travel encourages healthier modes of transportation e.g. walking and cycling	Noted.
Highways Agency	Objective 19) Support the promotion of travel plans. The requirement should apply to all types of development, including residential sites. Travel Plans should specifically require the consideration of targets, monitoring, incentives for compliance and a funding stream to maximize their potential for success.	Travel Plans are mentioned specifically in the policy wording
John Sharkey & Co on behalf of the University College for the Creative Arts	Objective 19) The Council presumably means 'private motor car' when using the term 'non-motorised'	The section is now more specific in its references to 'non-motorised'
Surrey County Council	Objective 19) cannot be supported, as currently wording excludes encouraging the use of public transport. To accord with SSP the objectives need to be re-worded so as to encourage travel by non-car modes. Travel plans have also been successful in new residential developments and not just businesses and schools	The remit for Travel Plans is now wider. Policy wording now supports public transport
Objective 20: Implement Highway Safety Measures		
	Objective 20) Highway safety measures would not be required if roads were built properly in the first place. For example, if people want to cross the road there should be sub-ways. Cyclists should have independent tracks of their own, which needs to be tied up with the infrastructure of the future	Noted. Where appropriate, developers will be required to contribute towards necessary infrastructure.
Highways Agency	Objective 20) HA wishes to be involved in early discussions of proposed development which is likely to have significant impact on the strategic network.	Noted
Government Office of the South East	Objective 20) Objective seems a little vague, particularly as the supporting text points out; it is Surrey County Council that is responsible for highway issues. Would it be possible to express more clearly what this objective is intended to achieve through the planning system. Would it also help to refer to the Surrey LTP here?	Noted. The section now makes specific reference to the Local Transport Plan. The Council supports the objectives of this plan, one of which is to improve road safety and security. The policy now specifically states that new development must be consistent with and contribute to the implementation of, the Surrey Local Transport Plan.
Environment Forum	Objective 20) Support the implementation of highway measures but are concerned that some measures in the past have inconvenienced pedestrians and disfigured the streetscape. For example, the junction of Epsom High Street with South Street	Noted.

John Sharkey & Co on behalf of the University College for the Creative Arts	Objective 20) The word 'encourage' should also be included, on the basis that the Council will presumably want to encourage other authorities which have a responsibility for highway safety measures	Noted
Surrey County Council	Objective 20) Requires rewording if it is to be supported. Better wording 'Implement highway safety measures and ensure that new development does not compromise highway safety'.	The policy is now more specific and relevant
Objective 21: Ensure Infrastructure is Provided with Associated Development		
Thames Water	Objective 21) Thames Water is satisfied that the term 'infrastructure' takes into consideration the provision of water supply, sewerage and waste management. The comments under 'Infrastructure Requirements' are Preferred Objective 21 are therefore supported	Noted.
Sport England	Objective 21) This is one of Sport England's key objectives to secure investment into sport and recreation infrastructure to meet the needs of new populations. SE has a number of planning tools and advice on how to achieve this e.g. Sports Facility Calculator which estimates demand generated. Active Places Power is a strategic planning tool which can be used to plan for future growth / trends. It is a database of sports facilities for the whole of England covering 10 types of facility: www.activeplaces.com . Registration is free	Noted.
Highways Agency	Objective 21) Support policies that require developers to mitigate against any transport impact that may be caused as a result from development, after every effort has been made to reduce demand through sustainable initiatives. Fro the HA point of view, new road infrastructure provision would be a last resort.	Noted. The Transport section requires development to be appropriate for the Highways network. Non motorised forms or transport are also encouraged.
Environment Forum	Objective 21) Support this option. It is highly regrettable that many people moved into the hospital cluster before local shops, public transport, surgeries etc were available. This encouraged the use of cars.	Noted. Policy requires developers to be able to demonstrate that the service and community infrastructure necessary to serve the development is available
John Sharkey & Co on behalf of the University College for the Creative Arts	Objective 21) This wording should be amended so the Council makes it clear it will also encourage and work with others (who have responsibility for infrastructure provision) to work towards the same objective. In the 'points for consideration, when dealing with education, the document indicates the provider is Surrey County Council. This is not correct as in the field of higher education the University College for the Creative Arts (an independent institution) is one such 'responsible body'.	Noted. It is stated that developers are expected to consult with facility / infrastructure providers to ensure the needs of the development are being met. The core Strategy is a spatial planning document and the Council will continue to work with other agencies and service providers to ensure that the Core Strategy objectives are met.
Surrey County Council	Objective 21) Supported. As development in Epsom and Ewell is likely to be on small scale sites, their cumulative impact could places as much pressure on infrastructure and services in the area as one major development. The CS needs to have regard to this cumulative impact.	Noted. The Developer Contributions SPD will provide further details
King Sturge on behalf of Helical Bar Plc	Objective 21) Although developers should liaise with the various authorities to ensure delivery of the necessary infrastructure required to serve any proposal, this policy and subsequent SPDs should not be used as a development tax to solve existing problems within the Borough. Contributions should be relevant to planning, necessary, directly related to the development proposed, fair and reasonable in scale and other respects, as set out in Circular 05/2005 Planning Obligations. The LDF should reflect this in national policy	Any DPDs / SPDs will be prepared in accordance with the most recent national policy

Town Centre and Local Centre Comments		
Local Committee for Epsom and Ewell	Objective Town Centre and Local Centres) Important to maintain the mix of uses in the town centre, however, there is concern over the growing number of restaurants and takeaway facilities. Epsom Town centre's role as a major retail centre in the county should be safeguarded.	Noted. The policy aims to maintain the role of the town centre and the balance of services it provides. Key objectives are incorporated in the Policy CS 17. The Council will prepare an Area Action Plan, to provide further details
Objective 22: Maintain and Encourage a Suitable Mix of Uses in Epsom Town Centre		
Sport England	Objective 22) SE encourages mixed use developments which make it more convenient to access recreation facilities in town centres	This is a main focus of the Epsom Town Centre policy
Highways Agency	Objective 22 & 23) Supports policies which primarily locate retail development where there are alternative transport modes available.	Noted. This is reflected in the concentration of uses in Epsom Town Centre
Government Office of the South East	Objective 22) PPS 6 states that LPAs should assess the need for further main town centre uses and ensure that there is the capacity to accommodate them. It is unclear from the document whether there has been any assessment undertaken of the need for new floorspace for retail, leisure and other main town centre uses. This is something that might be usefully clarified prior to the submission stage.	The Council will commission a Retail Capacity study to inform the policies in the proposed Area Action Plan and other SPDs
Environment Forum	Objective 22) Support this and also believe it is desirable to increase the residential capacity of the town centre.	Noted
King Sturge on behalf of Helical Bar Plc	Objective 22) It is important that the CS reflects the 1999 Sustainability Strategy and PPS1 (namely bringing forward sufficient land of suitable quality and appropriate locations, to meet the expected needs for housing, industrial, retail , commercial and leisure development. PPS6 says that LPAs should actively plan for growth by selecting appropriate existing centres to accommodate the identified need for growth, by making better use of existing land and buildings (including redevelopment) as well as extending the centre where necessary. The sequential approach for identifying suitable sites should give first preference to town centres due to their sustainable location. The CS therefore needs to acknowledge that the retail function has the single most important role in maintaining the vitality and viability of the town. This has been previously recognised by the Council in the formally adopted planning guidance (SPG) for Epsom Town Centre dated April 2003. Objective 22 should therefore be split to specifically address sustainability objectives and the retail function of the town centre before going on to promote other uses. The following wording is suggested: '22a Maintain and encourage a suitable mix of uses in Epsom Town Centre and strengthen its function by supporting new retail development which meets a proven need, increases the quality and range of shopping, and creates a safe, attractive and accessible environment. 22b Actively seek the re-use of previously developed land and identify suitable large development in the town centre to contribute to the enhancement of the vitality and viability of the town centre.'	Although the town centre will be the focus for retail development, PPS6 specifically encourages a mix of uses. The Town Centre policy aims to protect and reinforce the role of the town centre. A retail capacity study will be commissioned which will be used to inform the Area Action Plan.
Objective 23: Safeguard and Promote Retail Facilities in Local Centres		
Stamford Ward Residents Association	Objective 23) Support local centres, but what about out of town retail parks?	The Core Strategy, in line with PPS6 does not promote the development of out of town

		retail development. Support is provided for local centres
Highways Agency	Objective 22 & 23) Supports policies which primarily locate retail development where there are alternative transport modes available.	Retail development is to be focussed in the town centre which is a highly sustainable location
GVA Grimley on behalf of English Partnerships	Objective 23) As well as protecting existing local centres, the policy should also provide a framework for new local centres to come forward in appropriate locations to serve local needs such as the hospital cluster.	The option for identifying and creating new local centres where there is clearly a need has been provided for.

Community, Recreational and Cultural Facilities Comments		
Surrey County Council	Objectives Community, recreational and Cultural Facilities) Supported although there should be some qualification that account needs to be taken of operational requirements.	Noted.
Objective 24: Protect, Improve and Provide Community Facilities, Especially Ones That Cater for Young and Old People		
The Theatres Trust	Objective 24) Pleased to see this Objective will 'protect, improve and provide community facilities' and that this policy is linked with DN12 and 13 in the Surrey Structure Plan. However, the policy could be made more robust by the insertion of the words 'recreational and cultural' after the word 'community'. We hope you will agree this will make the policy clearer.	Noted. This wording is now included in the policy.
College Ward Residents Association	Objective 24) More must be done for young people in the Borough to discourage antisocial behaviour, much of which has its genesis in boredom	The policy places a particular emphasis on facilities for young people.
Environment Forum	Objective 24) Agree that the young and old have more limited access to community facilities and so it is right to focus provision with these in mind. Facilities should be provided within a short distance from the users homes to reduce the need to travel	This is recognised and is reflected in the Core Strategy's approach.
John Sharkey & Co on behalf of the University College for the Creative Arts	Objective 24) No reference is made to higher education. The Council does not seem to value 'life long learning'. This is a glaring omission as the Community Strategy has part of the section on 'A caring society and thriving economic community' titled 'Life Long Learning'. It would be useful for the CS to contain a specific part dealing with Higher Education; and for that part to recognise explicitly, that Higher Education Institutions are major contributors to the local economy and have particular need that should be addressed. Top up fees are more likely to increase competition between HEI's. Would be useful to designate sites where Higher Education is the main preferred user. Additionally, given that recently there has been a tendency to request developers to make contributions to 'local infrastructure/community facilities etc' the University College feels the Core strategy should recognise that HEI's are themselves community facilities and not the same as commercial developers	The contribution of educational institutions to providing local jobs is recognised, and specific mention is made of their key role in ensuring opportunities are available for life long learning.
Objective 25: Maximise Use of Accessibility of all Community, recreational and Cultural Facilities, Both Indoor and Outdoor		
Stamford Ward Residents Association	Objective 25) This may not always be popular with local residents (e.g. around Rosebery School)	Noted
Environment Forum	Objective 25) Do not feel this is the Environment Forum's area of expertise but would very much support the subsidy for disadvantaged people to use facilities	Noted