



## LICENSING AND PLANNING POLICY COMMITTEE

Monday 30 January 2023 at 7.30 pm

Place: Council Chamber, Epsom Town Hall

Link for public online access to this meeting:

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The members listed below are summoned to attend the Licensing and Planning Policy Committee meeting, on the day and at the time and place stated, to consider the business set out in this agenda.

Councillor Steven McCormick (Chair)  
Councillor Peter O'Donovan (Vice-Chair)  
Councillor Steve Bridger  
Councillor Neil Dallen  
Councillor Liz Frost

Councillor Rob Geleit  
Councillor Julie Morris  
Councillor Barry Nash  
Councillor Phil Neale  
Councillor Peter Webb

Yours sincerely

A handwritten signature in black ink, appearing to read "J. King".

Interim Chief Executive

For further information, please contact Democratic Services, email: [democraticservices@epsom-ewell.gov.uk](mailto:democraticservices@epsom-ewell.gov.uk) or tel: 01372 732000

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- Do not re-enter the building until told that it is safe to do so.

## Public information

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A link to the online address for this meeting is provided on the first page of this agenda and on the Council's website. A telephone connection number is also provided on the front page of this agenda as a way to observe the meeting, and will relay the full audio from the meeting as an alternative to online connection. A limited number of seats will also be available in the public gallery at the Town Hall. For further information please contact Democratic Services, email: [democraticservices@epsom-ewell.gov.uk](mailto:democraticservices@epsom-ewell.gov.uk), telephone: 01372 732000.

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## Exclusion of the Press and the Public

There are no matters scheduled to be discussed at this meeting that would appear to disclose confidential or exempt information under the provisions Schedule 12A of the Local Government (Access to Information) Act 1985. Should any such matters arise during the course of discussion of the below items or should the Chairman agree to discuss any other such matters on the grounds of urgency, the Committee will wish to resolve to exclude the press and public by virtue of the private nature of the business to be transacted.

## Questions from the Public

Questions from the public are permitted at meetings of this Committee. Any person wishing to ask a question at a meeting of this Committee must register to do so, as set out below.

Up to 30 minutes will be set aside for written or oral questions from any member of the public who lives, works, attends an educational establishment or owns or leases land in the Borough on matters within the Terms of Reference of the Licensing and Planning Policy Committee which may not include matters listed on a Committee Agenda.

All questions whether written or oral must consist of one question only, they cannot consist of multi parts or of a statement.

The question or topic may not relate to a specific planning application or decision under the Planning Acts, a specific application for a licence or permit of any kind, the personal affairs of an individual, or a matter which is exempt from disclosure or confidential under the Local Government Act 1972. Questions which in the view of the Chairman are vexatious or frivolous will not be accepted.

To register to ask a question at a meeting of this Committee, please contact Democratic Services, email: [democraticservices@epsom-ewell.gov.uk](mailto:democraticservices@epsom-ewell.gov.uk), telephone: 01372 732000.

Written questions must be received by Democratic Services by noon on the tenth working day before the day of the meeting. For this meeting this is **Noon, 16 January 2023**.

Registration for oral questions is open until noon on the second working day before the day of the meeting. For this meeting this is **Noon, 26 January 2023**.

## **AGENDA**

### **1. QUESTION TIME**

To take any questions from members of the Public.

### **2. DECLARATIONS OF INTEREST**

Members are asked to declare the existence and nature of any Disclosable Pecuniary Interests in respect of any item of business to be considered at the meeting.

### **3. MOTION REFERRED FROM COUNCIL (Pages 5 - 8)**

The report provides a basis for debate to the motion submitted to the meeting of Full Council on 06-12-2022 by the Labour Group about the Council's affordable housing specified in the new Local Plan

### **4. EPSOM AND EWELL LOCAL PLAN 2022-2040 (Pages 9 - 222)**

The purpose of this report is to seek approval to publish the Draft Local Plan (2022-2040) for public consultation for a period of six weeks commencing the 1 February 2023 in accordance with our adopted Local Development Scheme (the Local Plan timetable).

This is the first stage of public consultation as the Local Plan progresses towards adoption.

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## MOTION REFERRED FROM COUNCIL

<b>Head of Service:</b>	Victoria Potts, Interim Director of Environment, Housing and Regeneration
<b>Wards affected:</b>	(All Wards);
<b>Urgent Decision?(yes/no)</b>	No
<b>If yes, reason urgent decision required:</b>	
<b>Appendices (attached):</b>	None

### Summary

The report provides a basis for debate to the motion submitted to the meeting of Full Council on 06-12-2022 by the Labour Group about the Council's affordable housing specified in the new Local Plan

### Recommendation (s)

#### The Committee is asked to:

- (1) To reject the motion as Local Plan Policy must be evidenced based and as such the draft Local Plan provides a robust and more refined approach to maximise the delivery of affordable housing across both brownfield and greenfield sites.

## 1 Reason for Recommendation

- 1.1 To enable the Committee to debate the motion and make a decision.

## 2 Background

- 2.1 A Motion was submitted to the Council at its meeting on 6<sup>th</sup> December 2022 proposed by Cllr Kate Chinn and Seconded by Cllr Debbie Monksfield as follows:
- 2.2 *We as the Labour Group move that in the Local Plan Epsom and Ewell Borough Council will specify a minimum requirement of 40% of affordable housing in each new housing development of 10 or more units (Use Class C3) of which at least 25% will be reserved for social rent and comply with the vacant building credit.*
- 2.3 At Council, this item was referred to the Licencing and Planning Policy Committee as the relevant policy committee to debate the motion.

**2.4 Local Plan Policy**

- 2.5 If the Committee agrees, Regulation 18 of the Local Plan will be released for consultation on 1st February 2023. This document contains draft policies relating to affordable housing
- 2.6 The Local plan policies need to be evidenced based. Affordable Housing policies cannot be made without regard to evidence in regard of both the proportion of affordable housing but also the tenure split.
- 2.7 The Housing and Economic Needs Assessment (HEDNA) is the key piece of evidence and this identifies the need for affordable housing across the borough to inform the local plan policies. In addition to the HEDNA, another key piece of evidence is The Viability Study that has been undertaken and that identifies the level and mix of development that is viable.
- 2.8 Policies in the local plan cannot and must not undermine the delivery of new development. For example, if a policy in the local plan requires targets that cannot be met while enabling a development to be viable, the site would be unlikely to come forward undermining the deliverability of the plan
- 2.9 Brownfield sites carry additional costs to develop such as decontamination costs and also can have additional constraints. They have less viable than greenfield sites which can more readily enable a greater proportion of affordable homes to be delivered.
- 2.10 The draft local plan policy has taken the above into account to ensure that sites can be delivered. The draft local plan therefore includes 30% urban areas/brownfield and 40% on greenfield sites.
- 2.11 The tenure mix also has a significant impact on the viability for the scheme. For example, the delivery of social rented accommodation will carry a significantly greater cost to the developer than shared ownership or units with a lower proportion of discount against market rent.
- 2.12 In line with the requirement that local plan policies must not undermine the delivery of new development the Draft local plan. Therefore, the draft local plan affordable housing policy states that of 25 % of affordable housing should be first homes and the remaining allocation must reflect local needs and must be affordable having regard to local income and rents/prices. This is a starting point and will be subject to evidence at the time that sites come forward.
- 2.13 The affordable housing policy contained in the Draft Local Plan states that the Council will promote the reuse of buildings for affordable housing by applying Vacant Housing Credit.

2.14 **Summary**

- 2.15 In summary, local plan policies must be evidence based and must not undermine delivery of development in terms of viability that would restrict development sites coming forward. The proposal contained in the motion could undermine this delivery rendering sites not viable. In the event that the motion is carried, it will be reflected in a future iteration of the Local Plan.

**3 Risk Assessment**

Legal or other duties

3.1 Equality Impact Assessment

- 3.1.1 The motion would undermine the delivery of affordable housing in the borough as it would make much of the development in the urban area unviable and new housing would therefore not be brought forward.

3.2 Crime & Disorder

- 3.2.1 Not applicable.

3.3 Safeguarding

- 3.3.1 Not applicable.

3.4 Dependencies

- 3.4.1 The successful adoption of the Local Plan.

3.5 Other

- 3.5.1 The risks of the motion are outlined in the body of the report.

**4 Financial Implications**

- 4.1 The motion if carried would undermine the successful adoption of the Local Plan, which could result in a significant amount of resource, including financial resource, being wasted.
- 4.2 **Section 151 Officer's comments:** None arising from the contents of this report.

**5 Legal Implications**

- 5.1 **Legal Officer's comments:** None arising from the contents of this report.

**6 Policies, Plans & Partnerships**

- 6.1 **Council's Key Priorities:** The following Key Priorities are engaged:

- 6.2 **Service Plans:** The Local Plan delivery is included within the current Service Delivery Plan.
- 6.3 **Climate & Environmental Impact of recommendations:** The adoption of the motion could undermine the delivery of sustainable development and the ability of development proposals to incorporate climate change objectives and remain viable.
- 6.4 **Sustainability Policy & Community Safety Implications:** Not applicable.
- 6.5 **Partnerships:** None.

## 7 Background papers

- 7.1 The documents referred to in compiling this report are as follows:
- 7.2 The Draft Local Plan Regulation 18
- 7.3 The Housing and Economic Development Needs Assessment
- 7.4 The Local Plan Viability Report

## **EPSOM AND EWELL LOCAL PLAN 2022-2040**

<b>Head of Service:</b>	Victoria Potts, Head of Place Development
<b>Wards affected:</b>	(All Wards);
<b>Urgent Decision?</b>	No
<b>If yes, reason urgent decision required:</b>	
<b>Appendices (attached):</b>	Appendix 1 – Local Development Scheme (November 2022) Appendix 2 – Draft Epsom and Ewell Local Plan 2022-2040 Appendix 3 – Draft Local Plan Policies Map Appendix 4 – Sustainability Appraisal – Non-technical Summary

### **Summary**

The purpose of this report is to seek approval to publish the Draft Local Plan (2022-2040) for public consultation for a period of six weeks commencing the 1 February 2023 in accordance with our adopted Local Development Scheme (the Local Plan timetable).

This is the first stage of public consultation as the Local Plan progresses towards adoption.

### **Recommendation (s)**

**The Committee is asked to:**

- (1) Approve the publication of the Draft Local Plan (2022-2040) for public consultation to commence 1 February 2023 at noon and conclude on 15 March 2023 at midnight.**

## **1 Reason for Recommendation**

- 1.1 The Council is required by legislation to review its Local Plan every five years. The Council's current development plan consists of three Epsom and Ewell Borough Council documents all of which were adopted more than five years ago. The Epsom and Ewell Core Strategy (2009) and Plan E (2011) both predate the introduction of the National Planning Policy Framework and National Planning Practice Guidance. In the absence of an up-to-date Local Plan, this poses a few risk areas. These include the continued absence of a 5-year housing land supply and the additional measures introduced through the Housing Delivery Test.
- 1.2 The government will expect to see progression against their target date of all local planning authorities having an up-to-date Local Plan by the end of 2023.

## **2 Background**

- 2.1 The current Epsom and Ewell Development Plan consists of three locally produced documents detailed below:
  - Core Strategy (adopted 2009)
  - Plan E Area Action Plan (2012)
  - Development Management Policies (2015)
- 2.2 It is important to note that two of the above development plan documents adopted by the borough pre-date the introduction of the National Planning Policy Framework and Planning Practice Guidance, which have been updated several times since their introduction. Local Plans must be prepared to be in general conformity with National Planning Policy.
- 2.3 The Government introduced a legal requirement for all local planning authorities to review their local plans at least every five years in January 2018. The Council's existing Development Plan documents are therefore considered to be out of date which has implications for the determination of planning applications in the borough.
- 2.4 Local Plans must be evidence based and therefore we have undertaken a significant amount of work to ensure that the Draft Local Plan is informed by a suite of up-to-date evidence base documents.
- 2.5 The draft Local Plan is a single (all in one) Local Plan that contains the strategy and sites to guide how the borough will change and develop over the plan period up until 2040 as well as detailed development management policies.

- 2.6 The draft Local Plan sets out the spatial development strategy (the what, where and when) including the level and location of development. It also proposes the allocation of 9 sites to contribute towards meeting development needs as well as offering high level and detailed guidance on important matters such as economic development, the provision of housing and the protection and enhancement of the environment over the plan period.

#### Draft Local Plan

- 2.7 The draft Local Plan is structured into 8 Chapters with a glossary and other appendices (such as a housing trajectory) contained at the back of the plan. Chapter 1, the introduction, sets out the context and purposes of the Local Plan. Chapter 2 sets out the overarching long-term spatial vision of how the borough will be in 2040 (the end of the plan period) and accompanying strategic objectives. Chapter 3 sets out the spatial strategy determining the amount and location of new development and the key diagram. Chapter 4 sets out how places will change during the plan period and includes 9 proposed site allocations. Chapters 5-9 set out policies in relation to housing, economy, the environment and infrastructure.
- 2.8 Chapters 5 – 9 make it clear which policies are strategic in nature and which are detailed development management policies. Guidance on the strategic policies and how to use and interpret them is included in the Local Plan. The reason for this structure is in part to address the requirements of the National Planning Policy Framework but more importantly to make it clear to Neighbourhood Forums which policies are strategic as these are what any future neighbourhood plans prepared in the borough must be in conformity with.
- 2.9 The draft Local Plan has been written and structured in a way that makes it more user friendly; particularly for the non-planning professional. Each Policy is organised as follows:
- Why we need the policy
  - The policy itself
  - Implementing the policy
  - Key supporting documents (where applicable)
  - What existing policy does it replace
  - Monitoring the policy

#### Strategy and Sites

2.10 The draft Local Plan sets out our proposed growth strategy for the borough, which is to provide a minimum of 5,400 homes over the Local Plan Period (average of 300 dwellings per annum). In determining the proposed growth strategy for the borough, the Council has taken into account the need to balance the provision of new homes (including affordable housing) with environmental and policy constraints such as land designated as Sites of Special Scientific Interest, Sites of Nature Conservation Importance, Local Nature Reserves and Green Belt.

2.11 Development will first be directed to the most sustainable locations, making the best use of previously developed land in the urban area. In sequential order these locations are:

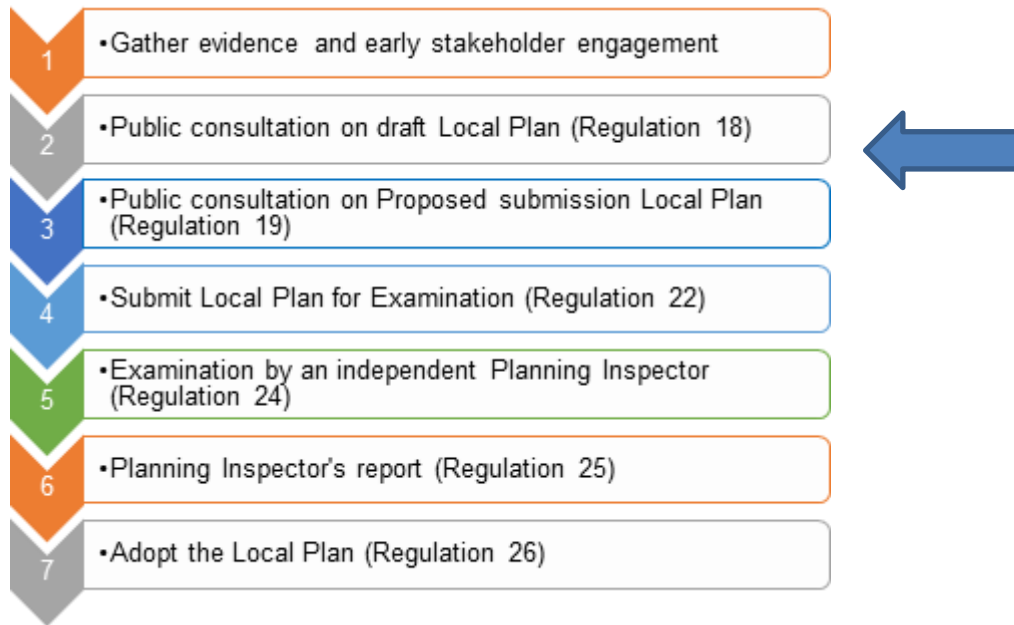
- **Epsom Town Centre** - Epsom town centre is the most sustainable location in the borough to accommodate new high density housing development due to its greater access to public transport, services and amenities. The town centre is the most sustainable location for other uses such as new retail, leisure and office development.
- **Kiln Lane and Longmead Industrial Estates** – most appropriate for employment uses to continue to play an important economic role for the borough and wider region.
- **Other centres and train stations within the urban area** - These centres fulfil several important functions for the borough including providing a distinct place identity and a hub for the community through convenience shopping and other commercial services such as professional services, restaurants and public services like libraries. Infill and redevelopment opportunities should be taken to increase the numbers of residents served by these centres. This will help to make them more viable in the long term.
- **Principal Movement corridors within the urban area** – Principal movement corridors present good opportunities for growth given their accessibility and existing mix of use and scale.
- **The wider urban area** - Between the borough's network of centres; between the pedestrian catchments of its railway stations; away from the borough's principal road corridors, opportunities will arise for the redevelopment of sites. It is important these sites that come forward for housing growth accommodate development that makes efficient use of available land.



- 2.12 Whilst these sustainable locations are our preferred locations for new development, they do not deliver adequate housing to meet our social responsibilities for providing housing, in particular affordable housing. For this reason, the Spatial Strategy incorporates appropriate previously developed land within the existing built-up area currently designated as Green Belt and green field land in the most sustainable locations adjacent to the existing built-up areas that is currently designated as Green Belt.
- 2.13 Taking into account the borough's constraints, the council is not planning on meeting its local housing need figure (as set by the Government's Standard Methodology). The Draft Local Plan sets a housing requirement of a minimum of 5,400 dwellings over the Local Plan period, which is approximately 5,000 dwellings less than the standard method output. The Draft Local Plan identifies a supply of housing that exceeds the housing requirement by approximately 500 dwellings, this buffer is to provide flexibility should sites not deliver as expected over the plan period. The council considers its position to be in accordance with paragraph 11b(i) and (ii) of the National Planning Policy Framework (NPPF, 2021).
- 2.14 The Strategy contained within the Local Plan has been assessed along with five other growth scenarios (reasonable alternatives) through the Sustainability Appraisal that is published alongside the Local Plan (Non-technical summary attached as Appendix 4). We consider that the Local Plan Strategy (scenario 4 in the Sustainability Appraisal) provides the optimal balance when assessed against social, environmental, and economic objectives.
- 2.15 During the Local Plan consultation, we will be undertaking a call for sites exercise to identify whether there are any additional potential development sites within the borough that could be suitable and available for development. Therefore, future iterations of the Local Plan may contain sites that do not currently feature in the Local Plan.

#### Local Plan Process

- 2.16 The diagram below illustrates the Local Plan process and shows that we are about a third of the way through the process of producing a Local Plan. This is the first formal opportunity to comment on the recommended strategy for guiding development across the borough over the plan period up until 2040.



2.17 We are intending to run a six-week consultation process in line with the legal requirements and our adopted Statement of Community Involvement (2022). After this consultation we will review all comments and representations that were made. We will then produce a Proposed Submission Draft Local Plan (“the Submission Draft”).

2.18 The Submission Draft will also be subject to a consultation process after which all comments submitted are forwarded to the Secretary of State for consideration by the Planning Inspectorate alongside the Submission Draft Plan. A Local Plan examination will follow afterwards allowing an opportunity to comment on the Plan. The Planning Inspectorate will be looking to determine if the Plan is sound. This means that the Plan should be:

- Positively prepared – the plan should provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – the plan should provide an appropriate strategy when considered against reasonable alternatives based on proportionate evidence;
- Effective – the plan should be deliverable over the plan period up to 2040 and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies of the Framework or other statement of national policy, where relevant.

Additional Information

- 2.19 We intend to produce a Local Plan made Easy Guide in addition to a Frequently Asked Questions (FAQ) document alongside the Draft Local Plan to encourage participation in the consultation process.

Proposed Changes to National Planning Policy and Legislation

- 2.20 On the 22<sup>nd</sup> December the government published a consultation on proposed reforms to national planning policy, essentially this is the prospectus for revising the National Planning Policy Framework that the government committed to publishing before Christmas. Alongside the core consultation document, the government published proposed National Planning Policy Framework (NPPF) Revisions. The consultation on both documents closes on the 2 March 2023 and the government says it will respond to this consultation by Spring 2023, publishing the framework revisions as part of this.
- 2.21 The government has also committed to a wider review of the NPPF, to follow Royal Assent of the Levelling Up and Regeneration Bill (the Bill). The government expects these plan making reforms to be implemented from late 2024.
- 2.22 The two core changes to the NPPF that are proposed are:
- The addition of text clarifying that the outcome of standard method for calculating housing need is a starting point for setting a local housing requirement. It is important to note that this has always been the case where evidenced, and as noted above the Council is proposing a housing requirement within the Local Plan that is significantly less than the housing need generated by the standard method as we do not consider that meeting this need will deliver sustainable development having regard to local constraints.
  - The addition of new text in the section on reviewing Green Belt which states that 'Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period'. It is important to note that the proposed revisions do not remove the ability of Local Planning Authorities to review Green Belt boundaries, this is because the only way amendments can be made to Green Belt boundaries is through the Local Plan process.

- 2.23 It is important to note, prior to any national policy or legislative amendments coming into force, the framework for plan preparation remains the NPPF (July 2021) and the established legislative framework. The governments consultation document also states that it is critical that work should continue on local plans before the new system is in place.

The need to progress the Local Plan

- 2.24 The Local Plan is a statutory requirement and the Government has made it clear that all local authorities must have an up-to-date plan. Failure to do so could lead to intervention whereby the Government writes our Local Plan and policies. Without a new plan we could find ourselves unable to resist unacceptable development or refused applications being allowed on appeal. This could result in unplanned development in unsustainable locations.
- 2.25 An up to date Local Plan is key to delivering other corporate priorities of the Council, including reducing homelessness through the delivery of more homes, and delivering additional affordable housing in the borough.
- 2.26 The Local Plan is not just about housing, it will include up-to date policies to secure higher environmental standards and better-quality design from development, in addition to setting out policies for shaping development in our town and local centres.

Summary

- 2.27 The draft Local Plan is intended to be fit for public consultation as per the Town and Country Planning (Local Plan) (England) Regulations 2012 and has been produced in conformity with the National Planning Policy Framework and the National Planning Practice Guidance. The draft Plan is informed up by a suite of evidence that has supported the development of policy. The evidence base will continue to develop until the plan is submitted to the Secretary of State and we will keep it up to date thereafter to ensure that it remains relevant.

Legal or other duties

2.28 Equality Impact Assessment

- 2.28.1 An Equality Impact Assessment has been prepared to appraise the Draft Local to ensure that the plan itself promotes equality and does not discriminate. The work concludes that there the Local Plan will not impact negatively on specific groups.

2.29 Crime & Disorder

- 2.29.1 None arising from this report.

2.30 Safeguarding

2.30.1 None arising from this report.

2.31 Dependencies

2.31.1 The delivery of key corporate objectives/actions are dependent on progressing the Local Plan, including:

2.31.2 Actions identified in the Affordable Housing Audit

2.31.3 Homelessness and Rough Sleeper Strategy and supporting action plan

2.31.4 Climate Change Action Plan

2.32 Other

2.32.1 None arising from this report.

**3 Financial Implications**

3.1 There are no direct financial implications as a result of this report. Local Plan funding has already been secured in terms of staffing within the Planning Policy team and funding for specialist external support in the preparation of technical evidence base documents.

3.2 **Section 151 Officer's comments:** None arising from the contents of this report.

**4 Legal Implications**

4.1 The draft Local Plan will be eventually examined for soundness after submission to the Secretary of State. There are various potential risks to the plan being found sound, and it may be vulnerable to a legal challenge by way of judicial review on grounds such as procedural defect or flaw, or failure to take into account any relevant material consideration.

4.2 In either case, it is essential that we can show that we have observed the procedural steps and requirements set out in the relevant regulations. These include not only the Town and Country Planning (Local Planning) (England) Regulations 2012, but also the Environmental Assessment of Plans and Programme Regulations 2004 and the Conservation of Habitats and Species Regulations 2017 (as amended). During its preparation, the draft Local Plan has been the subject of Strategic Environmental Assessment in accordance with the Environmental Assessment of Plans and Programme Regulations 2004 and an Appropriate Assessment in accordance with the Conservation of Habitats and Species Regulations 2017.

- 4.3 We will need to show that we have prepared our Local Plan in accordance with National Planning Policy (currently the NPPF, 2021) and the National Planning Practice Guide (digital resource), as well as creating and maintaining an up to date and proportionate evidence base to inform our policy decisions. The evidence base includes the documents that show objectively assessed need within the borough for all land uses but specifically housing (including for Gypsy and Travellers and Travelling Showpeople) and employment.
- 4.4 **Legal Officer's comments:** Under section 110 of the Localism Act 2011 a local planning authority has a duty to co-operate in relation to planning of sustainable development. The duty requires the local planning authority to engage constructively, actively and on an ongoing basis in the preparation of the development plan documents. This would include the preparation of the Local Plan.
- 4.5 Under Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 local planning authorities must review a local plan every five years from the date of their adoption.
- 4.6 Public consultation is required under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The people and bodies to be consulted are "specific consultation bodies", "general consultation bodies" and "such residents and other persons carrying on business in the area that the local planning authority considers it appropriate to invite representations from." Regulation 18 (3) of the Regulations requires the local planning authority to take into account any representation made during the consultation.
- 4.7 Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 states that the local planning authority before submitting a local plan must (a) make a copy of each of the proposed submission documents and as statement of the representations procedure and (b) ensure that a statement of the representations procedure and a statement of fact is sent to each of the specific consultation bodies invited to make representations under regulation 18(1).

## 5 Policies, Plans & Partnerships

- 5.1 **Council's Key Priorities:** The following Key Priorities are engaged:
- 5.2 The new Local Plan will contribute towards delivering the Council's Vision and priorities identified in its Four-Year Plan.
- 5.3 **Service Plans:** The matter is included within the current Service Delivery Plan.

- 5.4 **Climate & Environmental Impact of recommendations:** The Local Plan will play a key role in implementing our Climate Change Action Plan, specifically Objective 4 which requires the development and delivery of a Local Plan and associated policies that contribute positively and demonstrate the Council's commitment to climate change.
- 5.5 **Sustainability Policy & Community Safety Implications:** The Local Plan itself has a key role in delivering sustainable development.
- 5.6 **Partnerships:** The Council has a duty to cooperate with relevant stakeholders in the preparation of a Development Plan. The Council has consulted relevant stakeholder on a Duty to Co-operate Framework. Following consultation this document was revised and published.

## 6 Background papers

- 6.1 The documents referred to in compiling this report are as follows:

### **Other papers:**

- Sustainability Appraisal Scoping Report (2022)
- Sustainability Appraisal of the Epsom and Ewell Draft Local Plan 2022-2040, Non-Technical Summary (2023)
- Habitats Regulation Assessment (2023)

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# Local Development Scheme

(Timetable for preparing the Local Plan)

November 2022

Epsom & Ewell Borough Council

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## 1.0 Introduction

1.1 Epsom and Ewell Borough Council is required to prepare and maintain a Local Development Scheme (LDS) in accordance with the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011).“(2) The scheme must specify—

- a) The local development documents<sup>1</sup> which are to be development plan documents<sup>2</sup>.
- b) The subject matter and geographical area to which each development plan document is to relate;
- c) Which development plan documents (if any) are to be prepared jointly with one or more other local planning authorities
- d) Any matter or area in respect of which the authority has agreed (or propose to agree) to the constitution of a joint committee under section 29.

- e) The timetable for the preparation and revision of the development plan documents”.

*Planning and Compulsory Purchase Act 2004 (Section 15)*

- 1.2 The LDS is a project plan that sets out the timetable to produce new or revised Development Plan Documents which will form the Council’s statutory Development Plan<sup>3</sup>. This LDS, which supersedes all previous versions, sets out a planning work programme for the Council over a three-year period to 2025. It will be reviewed annually through the Authority Monitoring Report which can found [here](#).

## 2.0 The current adopted Development Plan

- 2.1 The current adopted statutory development plan for Epsom and Ewell Borough Council is made up of:
- Epsom & Ewell Core Strategy 2007
  - Plan E Epsom Town Centre Area Action Plan 2011
  - Epsom & Ewell Development Management Policies Document 2015
  - Surrey Waste Plan 2008
  - Surrey Minerals Plan Core Strategy 2011

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<sup>1</sup> As defined in Regulation 5 of The Town and Country Planning (Local Planning) (England) Regulations 2012. E.g., Local Plan, Supplementary Planning Document, Area Action Plan

<sup>2</sup> Development Plan Documents are for example Local Plans, Area Action Plans. They refer to the development and use of land, the allocations of sites and development management and site allocation policies.

<sup>3</sup> The statutory Development Plan is made up of all adopted Development Plan Documents, e.g., any local plan, area action plan both at the borough level and at the county level.

## 3.0 Other relevant documents

### Statement of Community Involvement

- 3.1 The current [Statement of Community Involvement](#) (SCI) was adopted in July 2022 to support the preparation of the Local Plan. The Statement of Community Involvement (SCI) describes how the public, businesses and interested groups within Epsom and Ewell Borough can get involved in the creation of local planning policy, neighbourhood planning and the planning application decision making process.

### Authority Monitoring Report

- 3.2 The Council publishes up-to-date authority monitoring information on its website. This focusses on assessing progress against the LDS and current planning policies that include annual numbers for new homes (including affordable homes). It also includes information about Neighbourhood Plans, the Community Infrastructure Levy (CIL) and the Duty to Co-operate.
- 3.3 The Authority Monitoring Report webpage can be viewed [here](#).

### Policies Map

- 3.4 Finally, the Council is required to produce a Policies Map which shows the location of proposals in all current, adopted local development documents on an ordnance survey-based map. The map is web based and is kept up-to-date and reflects current adopted policies within the borough.

### Community Infrastructure Levy (CIL)

- 3.5 The Community Infrastructure Levy (CIL) raises funds from new development for essential infrastructure. It primarily replaces the older system of financial contributions and planning obligations ('Section 106 agreements'). Under the CIL regulations limitations have been placed on the ability of councils to use S106 monies to provide for infrastructure beyond the mitigation of specific developments.
- 3.6 The Council adopted its CIL charging Schedule on the 29 April 2014 with an implementation date of 1 July 2014. The CIL charging rates are supported by evidence of development viability.

## Supplementary Planning Documents

- 3.7 Although part of the development framework, Supplementary Planning Documents<sup>4</sup> (SPDs) no longer need to be identified in the LDS. The Council currently has the following SPD's.
- Upper High Street, Depot Road and Church Street Development Brief 2012
  - Revised Developer Contributions Supplementary Planning Document 2014
  - Parking Standards for Residential Development 2015
  - Revised Sustainable Design Supplementary Planning Document 2016.

## 4.0 The emerging Development Plan

### Local Plan 2040

- 4.1 The Local Plan 2040 will set the vision and framework for future development of the borough to 2040. This will include addressing local housing need, the economy, environmental considerations, community infrastructure as well as strategic infrastructure needs. The geographical area covered by the Local Plan 2040 is the borough of Epsom and Ewell.

### Stages of Local Plan 2040 preparation

- 4.2 There are several key stages in the preparation of the Local Plan, each are subject to the Strategic Environmental Assessment (SEA) Directive<sup>5</sup> which will be incorporated into the Sustainability Appraisal<sup>6</sup>:

#### **Pre-publication stage (Regulation 18)**

This initial stage involves extensive evidence gathering, engaging with the local community, businesses and stakeholders on emerging issues and options, consulting with statutory environmental consultees on the scope of the sustainability appraisal, and infrastructure providers with regards to development options. This is scheduled for February – March 2023.

#### **Publication of Submission Draft Local Plan (Regulation 19)**

Following Regulation 18, the next stage is for the Council to publish a draft version of the Local Plan 2040 and invite representations in accordance

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<sup>4</sup> Supplementary Planning Documents are a type of Local Development Document, but they only concern any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land. Anything else is a Development Plan Document.

<sup>5</sup> The SEA Directive applies to a wide range of public plans and programmes (e.g., on land use, transport, energy, waste, agriculture, etc.). An SEA is mandatory for plans/programmes which are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste/ water management, telecommunications, tourism, town & country planning, or land use. An SEA can be summarized as follows: an environmental report is prepared in which the likely significant effects on the environment and the reasonable alternatives of the proposed plan or programme are identified.

<sup>6</sup> A sustainability appraisal is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic, and social objectives.

with Regulation 19. These representations will be based on whether the draft plan is legally compliant and/or sound when assessed against the requirements contained in the National Planning Policy Framework (NPPF). This is scheduled for February – March 2024.

### **Submission and Examination of the Local Plan (Regulation 22)**

Following Regulation 19 stage, the next stage is for the Council to formally submit the draft Local Plan 2040 and evidence base to the Planning Inspectorate for examination on behalf of the Secretary of State. An Independent Planning Inspector will assess the Plan against the tests of soundness contained in the NPPF, taking account of any representations (comments) received. This is scheduled for June 2024.

### **Adoption**

If the Plan is found to be 'sound', the Council may adopt the Plan as soon as practicable following receipt of the Inspector's report unless the Secretary of State intervenes. Once adopted, the Local Plan 2040 will form the main part of the statutory development plan for the borough. This is expected by Spring 2025.

- 4.3 The complete timetable and 'key milestones' to produce the Local Plan 2040 are set out in Appendix 1.

## **Neighbourhood Plans**

- 4.4 There is currently one Neighbourhood Plan Area Designation in the borough. Once adopted, Neighbourhood Plans form part of the Development Plan. These are not programmed by the local authority and therefore are not included within this LDS project timetable. More information can be found [here](#).

## **5.0 Delivery and Implementation**

### **Joint working - The Duty to Co-operate**

- 5.1 The Council has a proven track record of working with neighbouring authorities (including those outside the County) and with Surrey County Council. Where appropriate, inter-authority working groups will be established during the preparation of the Local Plan 2040. The Council will work in partnership with neighbouring authorities where necessary to prepare various evidence base documents.

### **Resources available for the production of the Local Plan**

- 5.2 In preparing the Local Plan, the Council's Planning Policy Team will utilise 'specialist officers', and other strands of expertise from within the Council, other organisations and bodies as appropriate.
- 5.3 The Council also makes provision for the need to use certain expert consultants to assist in producing various elements of the technical background work. This may occur where either the necessary expertise is not available within the Council or insufficient resources exist to be able to bring forward the necessary work within

the required timescale. Consultant facilitators may also be used to assist with focus group work and community participation exercises.

## Council Procedures

- 5.4 For matters relating to the new Local Plan, the following reporting protocols will apply:
- Licensing and Planning Policy Committee will be responsible for the preparation, production, and completion of the draft local plan (Regulation 18); and
  - Full Council will be responsible for the Proposed Submission Local Plan (Regulation 19) and the formal adoption of the local plan following consultation and examination.

## Risk Assessment

- 5.4 The production of a local plan requires consideration of the potential risk involved in its preparation. These vary from local matters, such as changes in staffing levels or political/administrative changes, to those of national significance including revised government guidance.
- 5.5 In preparing this LDS, it was found that the main areas of risk relate to:

**Problems with joint working or compliance with the duty to co-operate:** Close working with other authorities and organisations will continue to detect issues early in the process.

**Capacity of the Planning Inspectorate (PINS) and other agencies to cope with demand nationwide:** Advance notification of our programme will be given to assist in the development of PINS/other agencies work programmes' to address the requirements of the LDS.

**Revisions to national planning policy and guidance:** Revisions are anticipated to the NPPF. Changes to national planning policy and guidance at a more advanced stage in local plan preparation can cause delay. Close monitoring of national changes will be required alongside liaison with the Department for Levelling Up, Housing and Communities (DLUHC) where required.

**Full Council fails to agree Local Plan:** Officers will work closely with all Councillors to raise awareness of the Local Plan and seek to achieve 'buy-in' of its proposals at an early stage.

**Programme Slippage:** An exceptionally high level of response during public consultation on a Development Plan Document could lead to programme slippage.

**Legal Challenge:** The Council will aim to minimise this by ensuring that Development Plan Documents are 'sound' and founded on a robust evidence base and well-audited stakeholder and community engagement processes.

## Monitoring and Review

- 5.6 The Council's Monitoring Report will monitor the progress of the LDS on an annual

basis.

- 5.7 The Monitoring Report will monitor the delivery of policies when they have been adopted.



## 6.0 Appendix 1 - LDS timetable

### 6.1 Local Plan 2040- timetable to 2025/26

2022/23	Q3	Oct	
		Nov	
		Dec	
	Q4	Jan	
		Feb	Reg 18 - Public Consultation
		Mar	
2023/24	Q1	Apr	
		May	
		Jun	
	Q2	Jul	
		Aug	
		Sep	
	Q3	Oct	
		Nov	
		Dec	
	Q4	Jan	
		Feb	Reg 19 - Public Consultation
		Mar	
2024/25	Q1	Apr	
		May	
		Jun	Reg 22 – Submission of document
	Q2	Jul	
		Aug	EIP
		Sep	
	Q3	Oct	
		Nov	
		Dec	
	Q4	Jan	
		Feb	
		Mar	
2025/26	Q1	Apr	R
		May	A
		Jun	
	Q2	Jul	
		Aug	
		Sep	

#### Key

	Regulation 18 - Evidence base gathering, early engagement, and initial consultations
	Regulation 19 - Public Consultation – Publication of draft Local Plan
	Regulation 22 - Submission of document; EIP - Examination hearings; R - Inspector's final report
A	Adoption of Local Plan



# Draft Epsom and Ewell Local Plan

## Regulation 18

### Licensing & Planning Policy Committee Version - January 2023

**Please note:** This version of the Draft Local Plan has been produced for the consideration of the Licensing & Planning Policy Committee. The final version of the plan published for consultation will be a graphic designed version of this document to improve readability with the aim to encourage greater participation during the public consultation period. Whilst the written content will be the same, it will be presented differently with more images and infographics contained within the document. As a result, paragraph numbering will differ in the final version.

# Foreword

by Councillor Steven McCormick

The challenge is to produce a Local Plan that provides homes and jobs but also protects and enhances the area's character, natural and built environment, wildlife, and heritage assets for future generations to enjoy.

A home for everyone is the challenge we face as a society. We are determined to play our part in providing those homes. We want to make sure that high quality homes, of the right type and size are fit for today's needs and ready for the future with supporting infrastructure and amenities modern living demands.

The borough of Epsom & Ewell is a very special, unique, and beautiful place for all who live and work here. We want to keep it this way for generations to come, to help manage the future of the area and outline the direction we are heading. This Local Plan sets out how we propose to meet these sometimes-conflicting demands and offers a vision for the borough as a prosperous, safe, and healthy place where people from all communities want, and are able, to live and work.

We have developed a strategy which we believe will not only provide a significant number of affordable homes for current residents, our children and our grandchildren, but which also addresses several other challenges we are facing.

Growing families struggle to find suitable and affordable homes to move to. Our healthcare providers and schools struggle to recruit key workers. We aim to deliver homes local families can afford, as well as a greater variety of smaller homes and apartments to help young people get on the property ladder and others to downsize if they choose.

For the majority of our residents the Local Plan will deliver benefits and it will be good news. For those who will be most impacted we are committed to working with you to do everything we can to minimise the impact.

We believe our Local Plan provides a framework for the borough to grow in a strong and positive way so everyone will have the opportunity to live in an affordable, vibrant area with a strong growing economy.

Putting the plan together is a huge, complicated task, and finding the right balance for the borough is challenging and some decisions have not been easy.

The Local Plan will be made available on the 1st February 2023 for six weeks, for you to tell us if we have done enough, not done enough or maybe done too much. It is your chance to input and influence the plan for the borough.

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# 1 About this consultation

- 1.1 This draft Local Plan is available for public consultation for a period of six weeks between midday on 1 February 2023 and midnight on 15 March 2023.
- 1.2 You can find out how to respond to the consultation online by visiting our website at: <https://www.epsom-ewell.gov.uk/residents/planning/planning-policy/epsom-and-ewell-local-plan/emerging-new-local-plan> or for those without access to the internet, hard copies of the document are available to view at the Town Hall and the borough's libraries during opening hours.
- 1.3 You can also reach the website quickly by scanning the following QR code:



- 1.4 There are a series of consultation questions. The best way to submit your response is by using our online portal: <https://epsom-ewell.inconsult.uk/system/login>
- 1.5 If you are having difficulty registering to use the portal, please do contact us using the email below.
- 1.6 Alternatively, a questionnaire can be downloaded from our webpage, or requested by phone and completed and sent to us:  
**By email:** [localplan@epsom-ewell.gov.uk](mailto:localplan@epsom-ewell.gov.uk)  
**By writing to:** Planning Policy, The Old Town Hall, The Parade, Epsom KT18 5BY
- 1.7 Please note that the council will not accept anonymous, abusive or defamatory comments.
- 1.8 The comments received during this consultation cannot be treated as confidential so please do not include any personal information within your comments. Responses will be published on the council's website, together with the name and/or organisation name of the respondent.
- 1.9 If you have any further queries regarding any of the issues raised in this document, please contact the Planning Policy Team.
- 1.10 All documents will be held at the council and representations will be published online. All responses will be publicly available and identifiable by name and organisation (where applicable). Please note that any other personal information provided will be processed by the council in line with the Data Protection Act 2018.



## 2 Introduction and context

### Introduction

- 2.1 Epsom and Ewell Borough Council is preparing a new Local Plan, which will guide the location, scale, and type of development in the borough up to 2040.
- 2.2 The Local Plan:
- sets out a long-term vision and objectives;
  - provides a strategy for growth, new homes, employment, facilities and infrastructure to meet the area's needs; and
  - determines how the council will manage the built and natural environment.
- 2.3 This consultation is the first statutory stage (Required under Regulation 18 of the Town and Country Planning (Local Plan) Regulations 2012) of the new Local Plan. The council aims to adopt the new Local Plan by Spring 2025.
- 2.4 This Local Plan builds on the consultation undertaken in late 2017 when the council consulted on [four potential options](#)<sup>1</sup> for meeting the borough's development needs identified at the time. The four options were:
1. Urban Intensification;
  2. Release some Green Belt land for new homes;
  3. Significant Green Belt release to meet housing need and more; and
  4. Finding the Balance.
- 2.5 The responses received to the consultation were finely balanced in terms of support for Option 4.

### Why is the council preparing a new Local Plan?

- 2.6 The existing Local Plan comprises three documents that have been produced by the council. These are:
- The Core Strategy 2007
  - Plan E – An Area Action Plan for Epsom Town Centre 2011
  - The Development Management Policies 2015
- 2.7 The government has introduced a legal requirement for Local Plans to be reviewed every five years from the date of adoption. Since these documents were prepared national planning policy and practice guidance have changed. This means that the policies contained in the above three documents need to be reviewed to ensure that they are up to date. Having up to date policies means that they will have the most weight possible in making planning decisions.

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<sup>1</sup> Local Plan Core Strategy Review – Issues and Options (2017)

### **Which existing policies will be replaced by the new Local Plan?**

- 2.8 This is the first full review of the Local Plan and therefore all existing policies in the documents referenced above, will either be replaced by the new Local Plan or deleted.
- 2.9 Until the new Local Plan is adopted, the weight that can be attached to the existing Local Plan policies and to policies that emerge as part of the new Local Plan, will be dependent on several factors, including:
- the existing and proposed policy's consistency with national policy; and
  - the level of support or objection to proposed policies and the stage that it is at within the adoption process.

### **What is the purpose of this consultation?**

- 2.10 The council is seeking comments and information that will help us to further develop the strategy, site allocations and policies in the Local Plan. Some areas are less advanced than others. With regards to the possible site allocations, as part of this consultation, the council would like to hear your comments about the sites themselves, as well as what benefits the local community would like to see delivered as part of the sites being developed. The council has done a lot of work, and continues to collect and develop evidence, including this consultation, to inform the next iteration of the Local Plan (Regulation 19).

### **National Planning Policies**

- 2.11 Whilst the Local Plan reflects the aspirations and choices of its local community. The Plan must comply with specific requirements set out in current national planning policy and legislation. It must:
- reflect national planning policies set out in the National Planning Policy Framework and associated National Planning Practice Guidance;
  - contribute to the achievement of sustainable development and be supported by a Sustainability Appraisal and Habitat Regulations Assessment;
  - aim to meet housing and infrastructure requirements;
  - have regard to the other strategies of the council and its partners;
  - demonstrate joint working on cross-boundary issues;
  - take into account evidence of environmental constraints on development and the need to conserve the built and natural heritage; and
  - be deliverable within the Plan period taking account of identified constraints, infrastructure requirements and viability considerations.

### **Challenges facing Epsom and Ewell**

- 2.12 The most important challenge facing the Local Plan is to deliver growth to meet local needs and to consider any needs that cannot be met in adjoining areas. The aim is to maintain and reinforce our communities' sense of place while, wherever possible, enhancing the borough's character, environment and heritage. More specifically, the Local Plan needs to:
- deliver a sustainable level of housing growth having regard to the borough's constraints, to meet future housing needs;

- provide a range of housing that meets needs, for example related to size, tenure (including affordable housing) and specialist accommodation;
- provide space to enable local businesses to grow and to support and diversify the local economy;
- ensure that new or improved infrastructure is delivered to support the population increases and planned new development, including transport improvements, utilities and measures to reduce potential adverse environmental impacts;
- plan for improved local and cultural facilities to meet the needs of the growing and ageing population;
- provide for new and improved open space and green infrastructure;
- achieve high quality design and encourage innovation;
- preserve outstanding heritage and historic assets;
- protect and enhance the area's biodiversity and habitats and positively plan for addressing the implications of climate change; and
- help improve health and wellbeing.

### **What new work is being undertaken?**

- 2.13 Several studies provide evidence for developing the Local Plan's strategy and policies. Further studies and evidence work will be undertaken at later stages of the Local Plan process. Key evidence to support the Local Plan to this point includes:

- Housing and Economic Development Needs Assessment (2022) (HEDNA)
- Land Availability Assessment (2022) (LAA)
- Sustainability Appraisal (2023) (SA)
- Habitats Regulations Assessment (2023) (HRA)
- Local Plan Viability Study (2022)
- Green Belt Study – Part 1 (2022)
- Emerging Epsom Town Centre Masterplan (2022) (ETCMP)

### **Sustainability Appraisal and Habitats Assessment**

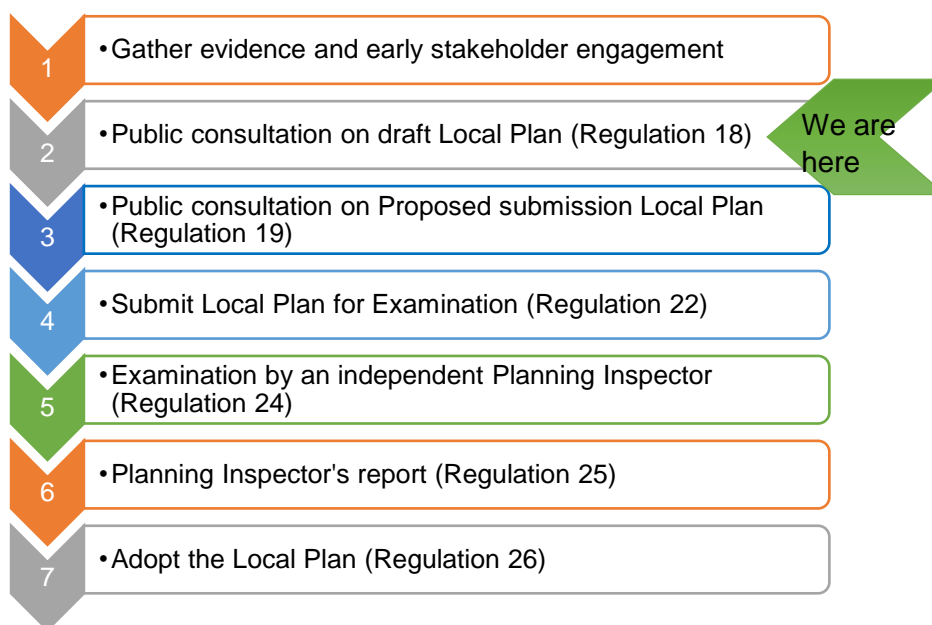
- 2.14 The Sustainability Appraisal (SA) is a key element in developing the Local Plan strategy and policies. The council is legally required to carry out an appraisal of the sustainability of all proposals. This assesses how the Local Plan will encourage sustainable development, by contributing to our economic, social and environmental objectives.
- 2.15 The council is also required to carry out a Habitat Regulations Assessment (HRA) to protect specific habitats and wildlife of European importance, notably Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).
- 2.16 These assessments will be consistent with the statutory regulations related to Strategic Environmental Assessment (SEA) and Habitat Regulations Assessments (HRA).

### **What are the next steps?**

- 2.17 The council will consider all representations received to this consultation and will group, summarise and publish them for information. Taking account of the consultation responses and further evidence work, the council will prepare and publish a Proposed Submission Local Plan (Regulation 19) for consultation. This

Local Plan will set out the council's preferred strategy, sites and policies and will be the Local Plan the council would ideally want to adopt.

- 2.18 The council will hold a consultation on the Proposed Submission Local Plan that will run for at least six weeks. This is anticipated to take place in the February / March 2024.
- 2.19 At that stage, the council will consider representations and then decide whether it should make any amendments to the Local Plan. All representations and any proposed amendments to the Local Plan will be submitted to the Secretary of State for examination by an independent planning inspector. The inspector will determine if the submitted Local Plan meets the required legal and procedural requirements, and when judged against national planning policy requirements the strategy and policies are 'sound'. If the Local Plan is found sound, the council will then adopt it.
- 2.20 The key stages in the preparation of the new Local Plan review are shown in Figure 2.



**Figure 2:** Local Plan process

### The Plan Period

- 2.21 The Local Plan will need to focus on a defined period of time. The National Planning Policy Framework (NPPF) suggests Local Plans should be drawn up over an appropriate time scale, preferably a minimum of 15 years. The plan period for the new Local Plan has therefore been set as 2022 to 2040. The start is when work initially commenced on evidence base and the end is 15 years from the potential date of formal adoption, allowing for some flexibility in the programme.

### The Duty to Co-operate

- 2.22 The Local Plan must be prepared in accordance with the Duty to Cooperate. This sets a legal duty for the Epsom and Ewell Borough Council as the local planning authority and other public bodies. They must engage constructively, actively and on an ongoing basis on planning issues which affect more than one local planning authority.

- 2.23 Epsom and Ewell Borough Council continues to work with neighbouring local planning authorities, Surrey County Council, statutory advisory bodies (the Environment Agency, Natural England and Historic England) and other infrastructure providers to ensure that the Local Plan addresses cross-boundary issues and reflects wider strategic priorities, including considering any needs that cannot be met in adjoining areas. The council has published a Duty to Co-operate Framework that will be updated as the Local Plan progresses towards adoption. The council continues to consult with residents and businesses, including working with neighbourhood planning groups.

### **Implementing the Local Plan Policies**

- 2.24 National planning law requires that decisions concerning planning applications must be made in accordance with the 'development plan' unless material considerations indicate otherwise. In this context, the 'development plan' for the Epsom and Ewell area includes all the policies of this (once adopted) Local Plan together with other 'development plan' documents (such as the Surrey Minerals Development Plan and Surrey Waste Development Plan). These policies must therefore be read as a whole.
- 2.25 The Local Plan should also be read as a whole. The individual policies and proposals must not be considered in isolation from each other. Often several different policies will be applicable to a single development proposal. Proposals that may comply with one policy may not necessarily comply with others. In reaching decisions on planning applications, the council and others involved in decision-making (such as the Planning Inspectorate) will consider all the relevant plan policies, together with other material considerations to reach a decision based on a planning balance.
- 2.26 For this reason, cross referencing of policies in the Local Plan is considered unnecessary and inappropriate. The repetition of standard planning criteria in every policy has similarly been avoided.

### **Structure and form of the new Local Plan**

- 2.27 The primary role of a Local Plan is to provide clarity for all on what the council considers will be acceptable development. It can also fulfil other roles. It can be regarded as a promotional document to attract inward investment, or to support the ambitions of existing residents or businesses. It can support bids for funding from central government.
- 2.28 The Local Plan has the potential to be a dynamic document addressing things that enhance the quality of life and improve how a place works. It addresses a wide range of issues from a spatial perspective. It can provide and encourage a more 'joined up' approach in the council's and other organisations' decision making and actions. This will steer decisions on how to allocate resources and encourage co-operation on important social, environmental and economic issues.
- 2.29 Many Local Plans however have ended up being documents that are 'dry', unnecessarily long, full of technical language and not user friendly; particularly for the non-planning professional. This new Local Plan provides the opportunity for Epsom and Ewell Borough Council to make the Local Plan a better presented and structured document.
- 2.30 The Local Plan includes various parts that are to be read as a whole. This starts with a vision and objectives setting out what the Local Plan aims to achieve.

- 2.31 To deliver the vision and objectives, there are a suite of policies and land designations. These are divided into high level policies called 'strategic policies' and 'site allocations', which set the strategy for the Local Plan and provide the high-level principles that development must adhere to. Specific land designations are detailed on the Policies Map which accompanies the Local Plan.
- 2.32 Then there are the detailed policies called 'Development Management' policies, which provide the detailed design and technical criteria and standards which proposed development will be assessed against.

### **The Strategic Policies**

- 2.33 A Local Plan should make clear which policies are strategic policies. They should be limited to those necessary to address the strategic priorities of the area to provide a starting point for any detailed policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through non-strategic policies. Non-strategic policies can be addressed elsewhere within a Local Plan or a Neighbourhood Plan.
- 2.34 The strategic policies start with the prefix 'S...'. For emerging neighbourhood plans it is important to note that policies in a neighbourhood plan must be in line with the strategic policies within the adopted Local Plan.
- 2.35 These policies are broken down by a series of headings:
- Why we need the policy: This sets out the justification for the strategic policy. For instance, to deliver national policy objectives or to support the delivery of partners' strategies and local priorities (e.g., other council strategies).
  - The strategic policy: The draft strategic planning policy.
  - Implementing the policy: This section sets out further detail on how the policy will be implemented. Historically such information in a development plan was referred to as supporting text.
  - Key supporting documents: This section sets out the information that has informed the policy, such as the published evidence base.
  - What existing policy does this supersede?: This identifies which current development plan policies that the policy will replace or if it is a new policy.
  - Monitoring the policy: This sets out the monitoring indicator and the sources of data. These will be used to inform and produce the Authority Monitoring Report.

### **The Detailed Policies**

- 2.36 Detailed policies start with the prefix 'DM...'. These policies are there to support the implementation of the strategic policies and are also broken down by the same series of headings.
- 2.37 Non-strategic policies in this Local Plan may be superseded by any policies identified in future Neighbourhood Plans. Not all communities wish to prepare a Neighbourhood Plan, so it is important for the Local Plan to cover these detailed matters. This does not preclude Neighbourhood Plans from being prepared and covering the non-strategic policies for their areas.



**Key facts about the borough****Population**

- 2.38 Epsom and Ewell borough is currently the home for 80,900 people (2021 census). It is the smallest borough in terms of geographical area in Surrey. Whilst it is the smallest in size, the population is relatively high and is also the most dense borough in Surrey. The borough is situated on Surrey's northern border adjacent to London. Its adjoining neighbours include the London Boroughs of Kingston and Sutton, and the Surrey authorities of Mole Valley and Reigate & Banstead.
- 2.39 The population of Epsom and Ewell borough has grown from 75,102 people to 80,900 people between 2011 to 2021. That is an increase of 7.7%. This is higher than the overall growth in Surrey of 6.2%. The population has appeared to increase quicker than the number of households and therefore household sizes have seen an increase. The average size in Surrey is 2.5 persons per household with the highest level found in the borough at an average of 2.58 persons per household.
- 2.40 The fastest growing group is the over 70s in Surrey. This trend is expected to continue in the next plan period, with a projected increase of 38% of those aged 65 years and over between 2022 to 2040 (HEDNA, 2022).
- 2.41 The proportion of households with dependent children is slightly higher than the England average. This suggests that the borough is a relatively attractive place to bring up children (HEDNA, 2022).

**Employment**

- 2.42 The borough supports a wide range of businesses, with two sizable employment sites that adjoin each other (Kiln Lane Industrial Estate and Longmead Industrial Estate) that predominantly cater for businesses requiring light industrial / manufacturing units and these two sites support over 160 businesses across a range of sectors that provide approximately 1,900 jobs.
- 2.43 The number of people employed in the borough is forecast to increase by over 9,300 jobs over the Local Plan period (HEDNA, 2022),
- 2.44 The borough has a successful equestrian sector that is concentrated outside the urban area including Epsom Downs Racecourse and its associated training grounds and stable complexes.
- 2.45 The borough is fortunate that the level of unemployment is low among the highest rate of economically active people of working age (84.2% in June 2022) in the country. Approximately 1.8% of working age adults in the borough are unemployed and claiming benefits (as of September 2022) compared to 3.7% of working age adults across Great Britain. However, the borough does have a skills shortage in some sectors, such as hospitality, and many workers are unable to afford homes close to work. This creates additional pressure to make sure that adequate provision is made for affordable housing.
- 2.46 Epsom Town Centre is the borough's primary retail area. Ewell and Stoneleigh are local centres and all have access to public transport including rail links.
- 2.47 Educational establishments, the University for the Creative Arts and Laines Theatre Arts are located within the borough. Levels of educational attainment in the borough

(NVQ4+, degree level and above) for 16-64 years olds are higher than the national average where the proportion of people with no qualifications is lower than the national average.

### **Deprivation**

- 2.48 Average gross weekly pay in the borough in 2021 (£702.8) was 14% higher than the average for Great Britain (£613), however there are pockets of deprivation including Court Ward which is one of the most deprived wards in Surrey. Epsom is one of the least affordable places to live in Surrey when comparing median household incomes to median property prices.

### **Housing**

- 2.49 Housing is an issue of great significance to the borough and forms a major theme of this Local Plan. The council has devoted considerable effort to understanding what the borough's housing needs are and have demonstrated this through our Housing and Economic Development Needs Assessment (HEDNA). The council has also identified the land available to meet development needs through our Land Availability Assessment (LAA). These documents form a key part of our evidence base.
- 2.50 The LAA has helped us to consider where new homes could be built by assessing the suitability, availability and viability of land to provide additional dwellings. The document is an audit of land at a point in time and does not decide where new homes or other types of development will be built or grant planning permission. The LAA helps to inform the process of deciding how many new homes and the amount of other development that may be delivered and when.

### **Natural Environment**

- 2.51 There are Sites of Special Scientific Interest (SSSI), Local Sites of Nature Conservation Importance and nature reserves.
- 2.52 The borough is the home to a variety of habitats and species particularly in natural/semi-natural landscapes of Epsom Common and Horton Country Park Nature Reserve. Other valuable green spaces include Hogsmill Park and Nonsuch Park which has historic links to Henry VIII, where his former palace was located.
- 2.53 Some areas of our borough, including Epsom Town Centre, are at risk of fluvial and surface water flooding. Flash flooding can cause severe disruption to people and businesses, closing main roads and damaging homes.

### **Heritage**

- 2.54 Our borough has a particularly rich and varied architectural heritage with 246 nationally listed buildings, over 50 locally listed buildings and 21 conservation areas. It also contains a registered park and garden.
- 2.55 Epsom has a rich history, including the home of the Epsom Downs racecourse and the world-famous Derby. It also where Epsom salts originated, found naturally from the area's water source.



**Infrastructure**

- 2.56 Pressure on existing infrastructure and additional stress caused by planned growth must be addressed to maintain and enhance the borough's prosperity and quality of life.
- 2.57 There are 19 primary phase schools in the borough, seven with nursery provision. There are four secondary schools, all of which also have post-16 education provision for academic and some vocational courses. Epsom has a further education college (NESCOT) offering vocational post-16 education with some adult education and part time course provision. The University for the Creative Arts (UCA) is also based within the borough offering higher education courses in creative industries.
- 2.58 Education provision for children and young people with special educational needs (SEND) is provided by education providers within and beyond the borough although depending on the SEND provision required, SEND provision may also be accessed in neighbouring boroughs, county wide or out of county.

**Transport and Accessibility**

- 2.59 The borough is well connected by a variety of travel modes, including four railway stations and a number of others nearby outside of its borders with trains taking less than 30 minutes to get to central London. There are also good road links to the A3 and M25. A network of bus services links destinations both within and outside the borough. Active travel routes such as cycle and pedestrian routes connect with public transport and road networks to provide opportunities for carbon neutral travel, although there is the opportunity to improve cycle infrastructure in the borough.
- 2.60 Whilst the transport infrastructure in the borough provides residents and visitors with a good variety of travel options, there are pockets of areas in the borough where the level of accessibility to regular bus services, direct train services and active travel routes with key amenity locations such as Epsom town centre remain limited.

**Competing and conflicting demands**

- 2.61 The Local Plan needs to protect our attractive and valued environment whilst reconciling the need to accommodate our development needs. The balance between protecting our environment and enabling development and supporting infrastructure, is at the centre of our spatial strategy.
- 2.62 It is the role of the Local Plan to balance the borough's competing and conflicting demands for land. The council has sought to achieve this through a controlled realignment of the Metropolitan Green Belt boundary and development of strategic sites, which will allow us to provide for mixed and inclusive communities supported by new infrastructure.

### 3 Vision and Objectives

- 3.1 To provide clarity on the type of place the borough is anticipated to be, and what it will seek to achieve from development, the Local Plan should set out a vision. The vision should be ambitious, but achievable. In addition, to support this vision strategic objectives will prioritise outcomes and provide a reference point that ground and justify policies in the Local Plan.
- 3.2 A new vision for Epsom and Ewell has been developed through the largest engagement exercise ever undertaken in the borough (Future40). The five key themes have been used to develop a Local Plan vision and set of strategic objectives that set out how plan-making and decision-taking can contribute towards achieving this overarching Future40 vision for the borough.

#### Vision

- 3.3 The new vision for the borough up to 2040 is:

In 2040 Epsom and Ewell will continue to provide a high quality of life and be an attractive place to live, work, study and visit. At the centre of its identity will continue to be the market town of Epsom, the University of Creative Arts, the Epsom Downs Racecourse and the conservation of its heritage.

New development will have delivered a range of new homes of varying sizes, meeting the needs of our changing population including those in specialist housing need, and from students through to older people.

New development will have been focussed on urban sites with the role of Epsom Town Centre of paramount importance having seen the most exciting and significant opportunities for growth.

New vibrant communities with their own identities will be centred around previously underdeveloped transport hubs and principal movement corridors.

The economy will be thriving, benefiting from high-speed digital infrastructure, and performing to its full economic potential, attracting new, and supporting existing businesses, from start-ups to larger companies.

The Epsom Downs racecourse will continue to be a significant part of the borough's unique identity and support a thriving equestrian sector.

Epsom Town Centre will have remained the principal urban centre in the borough and new development will have reflected and enhanced its urban qualities, with a rich collection of uses, compact neighbourhoods and safe streets. There will be more people living in the centre helping to support it as a prosperous market town, and support the existing shops, leisure cultural uses, public transport services and community facilities that are so valued by existing residents.

New development here will have secured investment in wider public realm improvements, providing more trees to help to cool streets in the summer and provide a more attractive place and new habitat for birds and other wildlife. It will be a place where people naturally choose to walk and cycle to and around, because the surrounding environment is even more pleasant.

The town centre will attract the best students and academic staff with modern facilities housing the University of Creative Arts and the Laine Theatre Arts School, who in turn contribute to the local economy. Graduates will have access to

affordable space within the town centre to make and sell their creations, making Epsom town centre even more distinctive from other nearby centres.

Ewell Village and Stoneleigh Broadway centres will continue to provide a distinct place identity and a hub for the community through convenience shopping and other commercial services such as professional services, restaurants, and public services like libraries. Infill and redevelopment opportunities will have been taken, increasing the number of residents served by these centres, helping to make them more viable in the long term.

Development across the borough will have been supported by improvements in community and transport infrastructure, with active travel networks having been a core part of growth in the borough improving air quality and benefiting the health and well-being of residents.

Epsom and Ewell will have remained a very green borough, valued by those who live in, work in and visit. Its network of green spaces that is embedded within communities will have been strengthened by development having delivered new public open spaces as well as enhancing the borough's existing streets and green spaces, improving habitats for wildlife, and providing better links to, from and between existing green infrastructure, securing amenity for both new and existing residents.

Growth will have been different from what has gone before, with a greater emphasis on design and built quality and on the delivery of environmentally sustainable homes and communities for families and new residents who want to contribute positively to Epsom and Ewell's unique character. New development will have helped to redress past mistakes by replacing poorly designed buildings and spaces with higher quality development.

The borough's identity will have been strengthened, with the existing character of places in the borough having played an important role in shaping development proposals in terms of building materials, proposed built form, retention of important views and vistas and improvements to the public realm.

## Strategic Objectives

### 3.4 The nine Strategic Objectives of this Local Plan are:

1. To provide a sustainable level of housing growth having regard to the borough's constraints, to meet future housing needs by identifying and maintaining a supply of land for housing ensuring this is of the right size, right type, provides the right tenure and is in the right location and provides a choice of housing for people at all stages of life.
2. To enhance the vitality and viability of Epsom Town Centre and the Local centres by supporting their diversification, and enhancement of the cultural offer and public realm.
3. To provide a sustainable level of economic growth to ensure that local people of all ages can find employment and remain in the borough by:
  - a. ensuring that existing and new businesses can thrive whilst supporting growth sectors and the continued success of the borough's education establishments and equestrian sector; and
  - b. supporting the creative industries, including start-ups through the provision of appropriate business accommodation.
4. To ensure that development is supported by the necessary physical, social and green infrastructure to meet people's current and future needs.
5. To maximise opportunities for those living, visiting, working and studying in the borough to access the diverse green infrastructure network.

6. To ensure that development does not have a detrimental impact on the borough's environmental assets including designated national sites, landscape character, water quality and biodiversity and that new development provides opportunities to provide for biodiversity net gains.
7. To support measures that prioritise active and sustainable travel modes including improved facilities for pedestrians and cyclists and improvements to public transport.
8. To deliver high quality and sustainable buildings and places that integrate into their surroundings and respond to local heritage.
9. To support action on climate change and reduction of the borough's carbon emissions, aiding the transition to net zero through a combination of mitigation and adaptation measures.

## 4 Spatial Strategy

- 4.1 The following strategic policies set out the Local Plan's spatial strategy. At its heart is a commitment to responding to the climate emergency and to deliver sustainable place-making, contributing towards the achievement of sustainable development. The scale and location of growth proposed has been informed by careful consideration of the evidence and the balancing of the social, economic and environmental positive and negative effects which could arise from growth and development in the borough.

### **Why we need a spatial strategy policy**

#### Housing

- 4.2 Significantly boosting the supply of homes is a key government objective. To achieve this, it is important that a sufficient amount and variety of land can come forward where it is needed, the needs of groups with specific housing requirements are addressed and, that land with planning permission is developed without necessary delay.
- 4.3 The scale of change required to boost housing supply across Epsom and Ewell is very significant. The borough must plan positively for this change.
- 4.4 The location of development in the borough is driven by the principle of sustainable development as set out in national policy. The council has therefore taken a 'brownfield first' approach and the Local Plan seeks to make as much use as possible of existing suitable brownfield sites, including all publicly owned assets and landholdings.
- 4.5 The priority will continue to be ensuring that identified urban sites are developed in such a way that they make a significant contribution to future housing provision.
- 4.6 National Planning Policy requires that to determine the minimum number of homes, Local Plans should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The housing need for Epsom and Ewell generated by the standard method is 576 dwelling per annum, which equates to 10,368 dwellings over the Local plan period. The Councils Housing and Economic Development Needs Assessment (2022) confirms there is no justification to increase the housing need figure over that generated by the standard method.
- 4.7 The urban areas of the borough were assessed, identifying the amount of development that could sustainably be accommodated. However, these sites will only provide approximately 3,700 dwellings (approximately 36% of the identified need for housing within the borough based on the governments standard methodology). This is based on the assumption that the urban sites identified as being suitable for development can be delivered over the plan period.
- 4.8 The council has therefore had to look at other options to boost housing supply. This has included exploring the potential for meeting the borough's local housing needs outside of Epsom and Ewell. However, based on current information, it is highly unlikely there will be any significant opportunities during the plan period to accommodate need outside of the borough boundary.

- 4.9 The council is therefore proposing to make changes to the Green Belt boundary, and has followed national planning policy, which requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process.
- 4.10 The council considers that the scale of unmet development / housing needs in the borough that would result from pursuing a brownfield only approach provides the exceptional circumstances and justification to make changes to the Green Belt boundaries in the borough.
- 4.11 Through the release of less than 3.6% of the boroughs Green Belt, the council will be able to deliver an additional 2,175 dwellings over the plan period, which combined with the urban area supply equates to approximately 56% of the need established by the standard methodology. This is the council's preferred spatial strategy which balances social, economic and environmental objectives.

#### Gypsy, Traveller and Travelling Showpeople accommodation

- 4.12 Gypsies, Travellers and Travelling Showpeople are recognised as ethnic groups and are protected from discrimination by the Equality Act 2010. The council is required to assess and plan for their specific needs for cultural appropriate accommodation.
- 4.13 The need is identified through the Epsom and Ewell Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA), 2022.

#### Employment

- 4.14 Building a strong and competitive economy is a government objective and as part of plan making, the council is required to positively and proactively encourage sustainable economic growth.
- 4.15 The council has carried out a robust and objective assessment of its employment needs which is detailed in the Housing and Economic Development Needs Assessment (2022). This assessment takes account of economic and job growth forecasts over the Local Plan period, but also local intelligence on demand for employment floorspace to meet the needs of established businesses.
- 4.16 Epsom and Ewell's principal industrial sites play an important economic role for the borough and wider region. Their continued commercial activity is essential with opportunities for intensification. Longer term opportunities for intensification for mixed use could be explored in time.
- 4.17 Modern employment accommodation that is compatible with residential uses will be provided to support the regeneration of Epsom Town Centre.

#### Retail and leisure

- 4.18 The NPPF states that the council should assess the quantitative and qualitative needs for land or floorspace for retail and leisure development over the next 10 years as a minimum. When planning for growth in its town and local centres, the council should allocate a range of suitable sites to meet the scale and type of retail and leisure development needed. It is important that the needs for retail, leisure and other main town centre uses are met in full and not compromised by limited site availability.



## The Spatial Strategy

- 4.19 This is the beginning of a new period of growth for the borough. The council is ambitious and determined that this will strengthen and enhance the character of the borough. Growth must be different from what has come before, with a greater emphasis on design and built quality and on the delivery of environmentally sustainable homes and communities for families and new residents who want to contribute positively to Epsom and Ewell's unique character.
- 4.20 Our development strategy for the plan period recognises the environmental constraints, the availability of land for development, the viability of development and the need to balance matters such as supporting the local economy and providing for affordable housing.
- 4.21 Development will first be directed to the most sustainable locations, making the best use of previously developed land in the urban area. In sequential order these locations are:
- **Epsom Town Centre** - Epsom town centre is the most sustainable location in the borough to accommodate new high density housing development due to its greater access to public transport, services and amenities. The town centre is the most sustainable location for other uses such as new retail, leisure and office development.
  - **Kiln Lane and Longmead Industrial Estates** – most appropriate for employment uses to continue to play an important economic role for the borough and wider region.
  - **Other centres and train stations within the urban area** - These centres fulfil several important functions for the borough including providing a distinct place identity and a hub for the community through convenience shopping and other commercial services such as professional services, restaurants and public services like libraries. Infill and redevelopment opportunities should be taken to increase the numbers of residents served by these centres. This will help to make them more viable in the long term.
  - **Principal Movement corridors within the urban area** – Principal movement corridors present good opportunities for growth given their accessibility and existing mix of use and scale.
  - **The wider urban area** - Between the borough's network of centres; between the pedestrian catchments of its railway stations; away from the borough's principal movement corridors, opportunities will arise for the redevelopment of sites. It is important these sites that come forward for housing growth accommodate high density development that makes best use of available land.
- 4.22 Whilst these sustainable locations are our preferred locations for new development, they do not deliver adequate housing to meet our social responsibilities for providing housing. For this reason, the Spatial Strategy incorporates appropriate previously developed land within the existing built-up area currently designated as Green Belt and green field land in the most sustainable locations adjacent to the existing built-up areas that is currently designated as Green Belt.

### Policy S1: Spatial Strategy

During the plan period (2022-2040), provision has been made for at least 5,400 new homes which equates to 300 dwellings per annum.

Employment needs (office, light industrial, industrial and warehousing) will be met through the intensification of existing strategic employment sites and the delivery of additional employment floorspace that is compatible with residential use in Epsom Town Centre.

Retail needs will be met within existing centres and through the provision of retail facilities within the Ewell East Station strategic allocation.

Provision will be made for at least 18 permanent pitches for Gypsies and Travellers over the plan period. This will be achieved through the allocation of a minimum of 10 pitches, with additional provision to be provided by permitting planning permission on suitable sites.

### Implementing the policy

- 4.23 Focusing additional housing and commercial needs within the borough's urban area is a continuation of the spatial strategy contained within the Epsom Core Strategy (2009). Further intensification of residential development within the established urban area represents a more efficient use of the land in accessible and well served locations in accordance with National Policy.
- 4.24 The Local Plan contains four strategic allocations within Epsom Town Centre which have been informed by the emerging Epsom Town Centre Masterplan. The regeneration of these sites will deliver new housing and additional commercial, education and leisure floorspace.
- 4.25 Epsom is the principal urban centre in the borough and new development should reflect and enhance its urban qualities – a rich collection of uses, compact neighbourhoods, safe streets. More people living in the centre will help to support Epsom as a thriving and prosperous market town, and support the existing shops, leisure cultural uses, public transport services and community facilities that are so valued by existing residents. This principle of supporting higher density developments in the more accessible and better served locations in the borough extends proportionately to Epsom and Ewell's other centres
- 4.26 There are exciting opportunities to create new vibrant communities in the borough, centred around currently underdeveloped transport hubs or through the development of larger sites. These developments will form new communities and grow to be distinct places with their own identities. They will need to be supported by appropriate investments in community and transport infrastructure to ensure existing and new residents are supported in terms of movement, health, education and other services.
- 4.27 The Local Plan contains five site allocations that will make a substantial contribution towards housing supply over the Plan period on land that is currently designated as Green Belt.
- 4.28 In addition to the allocated sites, the source of supply detailed in Table S1a below includes capacity from urban sites which do not benefit from a specific site allocation



within the plan with the sites detailed in Appendix 2. However, it is important to note that some of these sites have not been confirmed by the landowner as being available, despite the council contacting the freeholder. To be counted in the supply in future iterations of this Local Plan, the council needs the availability of these sites to be confirmed by the landowner.

- 4.29 In addition, as part of this consultation, the council is proactively seeking additional sites to be put forward for development within the urban area. If you are aware of additional sites that could be suitable and where the land is known to be available for development, please complete and submit a call for sites form.
- 4.30 A windfall allowance is included within our housing supply for sites that will deliver 4 or less dwellings which is based on past delivery trends.
- 4.31 The Local Plan housing requirement has been set as a minimum of 5,400 dwellings over the plan period. How the council will achieve this minimum requirement is set out in Table S1a below. It should be noted that supply exceeds the requirement by approximately 500 dwellings, this is to provide flexibility over the Local Plan period should sites fail to be delivered. Further information on when the different sources of supply are anticipated to deliver housing is contained in the Housing Trajectory (Appendix 3)

**Table S1a: Sources of supply over the Local Plan period: 2022-2040 (net number of new homes)**

<b>Housing Requirement</b>	5,400
Commitments (permissions as of March 2022)	1,041
Town Centre Site Allocations	1,070
Urban LAA sites	1,042
Windfall	561
Allocations beyond current urban area (Green Belt)	2,175
Total supply over the plan period	5,889
Buffer for non-delivery	489

- 4.32 Further details of the sites that are key to delivering the strategy are detailed in the site allocations policies of the Local Plan and shown on the Policies Map.

#### Employment

- 4.33 As detailed in the HEDNA (2022), there is demand for additional employment floorspace in the area to meet the needs of existing businesses and to cater for new businesses. To ensure that a range of employment sites and premises are available the objective is to safeguard existing strategic employment sites and encourage the implementation of both extant planning permissions and the delivery of additional office accommodation within the town centre strategic allocations.

#### Retail

- 4.34 In accordance with the National Planning Policy, the Local Plan defines a hierarchy of centres and ensures new main town uses are focused within these centres to maintain vitality and viability. The existing stock of premises will have a role to play in accommodating any projected retail growth.

**Key supporting documents**

- Housing and Economic Development Needs Assessment (2022)
- Land Availability Assessment (2022)
- Gypsy and Traveller Accommodation Assessment (2022)
- Retail and Commercial Leisure Needs Assessment (2021)
- Green Belt Study (Part 1) (2022)

**What existing policy does this supersede?**

- Core Strategy Policy CS7 – Housing Provision
- Core Strategy Policy CS8 – Broad Location of Housing Development

**Monitoring the Policy**

- 4.35 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
The number of new homes permitted and completed each year	Planning decisions and appeals Monitoring data
The number of Traveller pitches plots permitted and completed each year	Planning decisions and appeals Monitoring data
The amount of net employment floorspace permitted and completed each year	Planning decisions and appeals Monitoring data
The amount of net retail floorspace permitted and completed each year	Planning decisions and appeals Monitoring data

## Policy S2 - Sustainable and viable development

### Why we need the policy

- 4.36 Councils are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. This policy meets this requirement and adopts the model wording suggested.

### Policy S2: Sustainable and viable development

#### Sustainable development

- 1) When considering development proposals, the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The council will always work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
- 2) Planning applications that accord with the policies in the Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
- 3) Where there are no policies relevant to the application or they are out of date at the time of making the decision then the council will grant permission unless material considerations indicate otherwise – taking into account whether:
  - a) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
  - b) specific policies in that Framework indicate that development should be restricted.

#### Viable development

- 4) The council will be proactive in working with developers to identify ways in which their schemes can be made financially viable, including the use of other sources of funding and alternative models of delivery.
- 5) Where a developer seeks to negotiate a reduction in standards that would normally apply to development, or a form of development that would not normally be acceptable, on grounds of financial viability, the developer must supply evidence as to the financial viability of the development. This will normally take the form of a published open book financial appraisal of the proposed development, demonstrating the full range of costs to be incurred by the development including the initial purchase of the land, the financial return expected to be realised, and the profit expected to be released. The level of detail required in such an appraisal will always be proportionate to the scale and complexity of the development proposed. In cases where the council needs to

undertake an independent assessment of the appraisal, the developer will have to pay for this

### **Implementing the policy**

- 4.37 The NPPF emphasises that all Local Plans should be based upon and reflect the presumption in favour of sustainable development. The principle informs both the policies and site allocations contained within the Local Plan and will be used to guide decision makers.
- 4.38 To facilitate an efficient decision-making process, any financial viability report/appraisal must be in compliance with the HCA Development Appraisal Tool (DAT). If this is not provided it will delay the application or lead to the refusal of planning permission.
- 4.39 Where proposals have been tested and concluded to be viable through the Local Plan viability assessment, the applicant will need to use the Local Plan viability assessment as the benchmark and state what has changed to make the proposal unviable.
- 4.40 In assessing the information supplied in a financial appraisal, the council will always seek to ensure that its decision represents the appropriate balance between the desirability of securing delivery of the development, and that of providing in full for the standards set out in planning policy. However, a financial appraisal submitted in support of a development is only current at the time it is prepared. Financial viability will vary over time with the changing economic and property markets. Therefore, the council will require viability review mechanisms through s106 agreements where policy requirements are not met in full at the time permission is granted.
- 4.41 On large sites that are expected to be built out over a period of time or in phases, viability may need to be re-assessed at different points (such as prior to the commencement of each phase). In order to ensure that appropriate affordable housing provision is secured in circumstances where there is a change in viability of a development scheme during its implementation, the associated Section 106 agreement will contain a requirement for reassessment at later stages in its construction. The council's position for reviewing viability is that all major developments, including residential development, include at least, an outturn retest 75% of the way through the development to compare actual costs and values with those assessed at the application stage. If viability has improved, allowing for additional affordable housing to be provided on site or in exceptional circumstances a in-lieu contribution to off-site affordable housing, will be required.

### **Key supporting documents**

- Local Plan Viability Study (2022)

### **What existing policy does this supersede?**

- New Policy

**Monitoring the policy**

- 4.42 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Number of planning applications refused	Planning decisions and appeals

**Policy S3: Making Efficient Use of Land****Why we need the policy**

- 4.43 Planning policies should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 4.44 Due to the constrained nature of the borough, the council must maximise the use of previously developed or brownfield land with the urban area to assist in meeting the housing requirement and other development needs over the plan period, for example by supporting the development of under-utilised land and buildings.
- 4.45 Optimising the density of development will concentrate development in the most sustainable locations, assist in reducing private car use, promote shifts to sustainable modes of transport and support the commercial viability of local services and facilities.

**Policy S3 – Making Efficient Use of Land**

- 1) Development must make efficient use of land by following a design-led approach to optimise the capacity of sites within the borough's urban area as defined on the Policies Map.
- 2) Site allocations will be expected to deliver the minimum number of homes specified within Policies SA1- SA9 of the Local Plan. Proposals for all other major residential developments are expected to achieve the following minimum net densities, based on the areas below that are defined on the Policies Map:
  - a) Epsom Town Centre a minimum density of 80 dwellings per hectare (dph);
  - b) Principal movement corridors and transport hubs beyond Epsom Town Centre boundary – a minimum density of 60dph; and
  - c) Remaining urban area – minimum density of 40dph

- 3) Proposals for major development<sup>2</sup> that do not meet these density standards will only be permitted where it has been demonstrated that development at the identified density would be inappropriate.
- 4) Proposals for residential development of fewer than ten homes are expected to demonstrate how they have achieved efficient use of land.

### **Implementing the policy**

- 4.46 The site allocations detailed within Policies SA1 – SA9 contain minimum housing requirements that are expected to be delivered by development at the sites following consideration of the sites location, the need to accommodate a mix of uses (where relevant), housing mix and environmental and policy constraints affecting the site.
- 4.47 For major sites not allocated within the Local Plan, the policy identifies densities that apply to three geographical areas in the borough which are defined on the policies map, with higher densities being sought in locations where there are more opportunities for sustainable travel and proximity to services and facilities.
- 4.48 A design-led approach to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth to determine the appropriate form of development. The optimum capacity for a site does not mean the maximum capacity. In some instances, a lower it may be that a lower density development is the optimum capacity for the site. Considerations in this regard may include physical, environmental and policy constraints affecting the site, consistency with Design Guidance/Codes and development viability.
- 4.49 Planning applications will not be supported where it is considered that they fail to make efficient use of land and no robust justification for the deviation from the council's density requirements has been provided.
- 4.50 To avoid piecemeal development, proposals for a site adjacent to another site with development potential (as identified in the latest Land Availability Assessment or equivalent land supply evidence base document) should demonstrate that all reasonable attempts to develop the sites comprehensively have been exhausted. Development proposals that impede the potential for developing an adjoining site will not be supported.

### **Key supporting documents**

- National Design Guide

### **Which existing policy / policies does this supersede?**

- New Policy

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<sup>2</sup> Defined as “ten or more homes, sites of 0.5 ha or more and non-residential developments of 1,000 square metres or more”

## Monitoring the Policy

The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Number of residential schemes that comply with the minimum density standards	Planning decisions and appeals

## Policy S4: Development in the Green Belt

### Why we need the policy

- 4.51 Most of our countryside beyond the boroughs urban areas is designated as part of the Metropolitan Green Belt that surrounds London. The main aim of Green Belt is to prevent urban sprawl by keeping land permanently open. Green Belt also provides opportunities for people to access the countryside, to protect land for agriculture, forestry, and similar land uses, and for nature conservation.
- 4.52 National Policy states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt. Those that do not should be inset, or removed, from the Green Belt and other development management policies used to restrict any inappropriate development. Whilst not villages, a similar approach is applicable to major previously developed sites in relation to whether they should remain washed over or be inset from the Green Belt.
- 4.53 National policy requires that land which it is unnecessary to keep permanently open should not be included in the Green Belt. If major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt.
- 4.54 Within the borough there are several areas that are currently designated as Metropolitan Green Belt but are predominantly developed and urban in character. These include parts of the NESOT college campus (excluding the playing fields) and the five hospital sites which were allocated for residential development in the Core Strategy.
- 4.55 The Green Belt Study Part 1 (2022) breaks the councils Green Belt into 53 land parcels which cover relatively sizable geographical areas. A future revision to the Green Belt Study Part 2 will undertake a detailed assessment of Green Belt boundaries in the borough, the proposed methodology for which is contained in the Part 1 Study (2022).
- 4.56 National Policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. The council considers that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and to promote sustainable patterns of development.



- 4.57 Whilst the general extent of the Green Belt has been retained, land is proposed to be removed from the Green Belt in order to enable development around the boroughs urban area, notably site allocations at Land at West Park Hospital (Policy SA5), Horton Farm (Policy SA6); Land at Chantilly Way (Policy SA7); Land Adjoining Ewell East Station (Policy SA8) and Hook Road Arena (Policy SA9). These five allocations will result in approximately 55.6 hectares of land which accounts for 3.6% of the land within the borough that is designated as Metropolitan Green Belt being de-designated to facilitate development.

### **Policy S4 – Development in the Green Belt**

- 1) Land which is designated as Green Belt on the Policies Map will be protected against inappropriate development in accordance with National Planning Policy. Inappropriate development will not be permitted unless very special circumstances can be demonstrated. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm is clearly outweighed by other considerations.
- 2) The construction of new buildings in the Green Belt will constitute inappropriate development, unless the buildings fall within the list of exceptions identified by National Planning Policy.
- 3) Certain other forms of development are also considered not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it, and these are listed in National Planning Policy.

### **Implementing the policy**

- 4.58 National planning policy advises that most forms of development in the Green Belt are ‘inappropriate development’. National policy lists out those developments which are considered to be not inappropriate. For the purposes of interpreting those exceptions which result in alteration, extension or replacement of an existing building in the same use, the ‘original building’ refers to the building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally after this date. In assessing how a proposal relates to the original building, a comparative assessment of footprint and volume will be made.

For the purpose of this policy, the following definitions will apply to those exceptions:

#### Extensions or alterations

(a) The “original building” shall mean either:

- i. the building as it existed on 1 July 1948; or
- ii. if no building existed on 1 July 1948, then the first building as it was originally built after this date

#### Replacement buildings

(b) A new building will only constitute a “replacement” if it is sited on or in a position that substantially overlaps that of the original building, unless it can be clearly



demonstrated that an alternative position would not increase the overall impact on the openness of the Green Belt.

#### Limited infilling

(c) “limited infilling” shall mean:

Limited infilling in developed areas within the Green Belt may also be appropriate, where it can be demonstrated that the site ought to be considered to be within the urban area.

- 4.59 Where a proposed basement would be wholly subterranean; does not exceed the footprint of the building and is served only by discreet lightwells; ventilation systems or means of escape; its footprint and volume will not contribute towards this assessment.
- 4.60 Applicants are encouraged to take opportunities to improve the openness of, and access to, the Green Belt where this is possible. This could involve focusing development in a less conspicuous or open part of the site or removing a sprawl of buildings in favour of a single mass which leaves the remainder of the site open. The provision of public access to Green Belt land is also encouraged.

#### **Key supporting documents**

- Green Belt Study (Part 1) (2022)

#### **Which existing policy / policies does this supersede?**

- Core Strategy - Policy CS2: Green Belt

#### **Monitoring the Policy**

The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Number of planning decisions, including appeals, granting permission for inappropriate development in the Green Belt	Planning decisions and appeals

## Policy S5: Climate Change and Mitigation

### Why we need the policy

- 4.61 Climate change will present major challenges affecting people's lives, homes and businesses, which need to be considered in the delivery of new development. Mitigating against and adapting to climate change is an international, national and local priority.
- 4.62 The council has an important role in shaping new and existing developments in ways that reduce carbon emissions and positively build community resilience to problems such as flood risk or heat stress. Policies in the Local Plan must ensure that development within the borough contributes to the mitigation of, and adaptation to climate change. The council is committed to tackling climate change and this policy sets out the overarching policy approach to climate change, drawing on the evidence from the Epsom and Ewell Climate Change Study – Stage 1 (2022).

<b>Policy S5 – Climate Change and Mitigation</b>	
<b>Climate Change Mitigation</b>	
1)	<p>New development will be permitted which helps build communities that mitigate the impacts of climate change by:</p> <ul style="list-style-type: none"> <li>a. addressing climate change through low/zero carbon design and improving the energy efficiency of buildings;</li> <li>b. supporting renewable and low carbon energy and heating schemes for major development proposals;</li> <li>c. directing development to locations that will minimise the need to travel and maximise the use of sustainable modes of transport including cycling, walking and public transport, promoting a modal shift away from private car use;</li> <li>d. ensuring that trees are protected, and that there is no net loss in the carbon storage capacity provided by the borough's trees;</li> <li>e. increasing the potential for green infrastructure and habitats through biodiversity net gain;</li> <li>f. supporting the low carbon economy; and</li> <li>g. adopting a circular economy approach to building design and construction to reduce waste, to keep materials and products in use for as long as possible, and to minimise embodied carbon.</li> </ul>
<b>Climate Change Adaptation</b>	
2)	<p>New development will be permitted which helps build communities that are resilient to climate change and contribute to healthy living by:</p> <ul style="list-style-type: none"> <li>a. being designed so as to maximise the potential for climate change adaptation, to ensure that new development minimises vulnerabilities and provides resilience to impacts arising from climate change;</li> <li>b. maximising sustainable water use;</li> <li>c. addressing existing and future flood risk;</li> </ul>

- d. maximising the potential of green infrastructure in the design of new development to facilitate adaptation to climate change;
- e. planting trees and other vegetation, where appropriate as part of the landscape scheme, to provide shading of buildings, streets and open spaces / amenity areas;
- f. delivering biodiversity net gain and avoiding the loss of biodiversity; and
- g. minimising the potential for heat stress, through innovative design.

### **Implementing the policy**

- 4.63 It is important that buildings are designed to be resilient not just in the short term but throughout their anticipated lifetime. This should include designing buildings to keep cool without using power through the use of appropriate construction materials, layout and building orientation and the use of green infrastructure for urban cooling and shading. Consideration should also be given to the need for water conservation through a range of water efficiency measures.
- 4.64 The likelihood of flooding is predicted to increase because of climate change causing more extreme weather events. A Strategic Flood Risk Assessment (SFRA) has been produced which identifies the areas at highest risk of flooding (Flood Zones 2, 3a and 3b). It is important to ensure that new development avoids areas of high flood risk and is designed to minimise surface water flooding through the use of Sustainable Drainage Systems (SUDS).
- 4.65 The use of renewable energy rather than fossil fuels will help to reduce carbon emissions and thus reduce climate change.
- 4.66 Successful adaptation to climate change requires a holistic approach, which includes everything from flood risk to heat stress. Green infrastructure plays an important role in climate change mitigation, contributing to climate change adaptation, including through reducing heat stress and the potential for surface water flooding.
- 4.67 The Local Plan Viability Study has tested the requirements detailed in the policy and associated supporting policies to ensure that they do not undermine the delivery of the Local Plan by making development unviable.

### **Key supporting documents**

- Epsom and Ewell Climate Change Study – Stage 1 (2022).
- Local Plan Viability Study (2022)

### **Which existing policy / policies does this supersede?**

- New Policy

**Monitoring the Policy**

- 4.68 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source
Number of residential schemes that comply that do not comply with the policy requirements	Planning decisions and appeals

## 5 Planning for places

### Introduction

- 5.1 This chapter sets out how the Spatial Strategy (Policy S1) will be delivered and includes nine strategic allocation policies. These sites are those that make the greatest contribution towards delivering policy S1, are sites that have been confirmed as available for development and will deliver a net gain of 25 new homes or more.
- 5.2 The site allocations in this chapter are informed by a range of evidence base that supports the Local Plan, including the findings of the Land Availability Assessment ('LAA') and the Sustainability Appraisal. Development is directed to the most sustainable locations, making the best use of previously developed land in the first instance.
- 5.3 Policies SA1- SA4 set out site-specific development requirements for the strategic sites located in Epsom Town Centre that have been informed by the emerging Epsom Town Centre Masterplan. Regard has been had to securing a viable and vibrant future for the town centre. Ensuring accessibility and protection of its unique heritage assets is part of this, as is the provision of new, high-quality homes for a range of households
- 5.4 Policies SA5 – SA9 - set out the residential-led site allocations outside of Epsom Town Centre and on land that is proposed to be inset from the Green Belt. The Local Plan contains numerous other policies, which also apply to these sites in addition to the specific requirements set out in the site allocation policies. Where site allocation policies set out requirements that are more stringent than those in another policy within the Local Plan, the site allocation policy will take precedence.
- 5.5 Together, the site allocations seek to deliver a significant proportion of the Local Plan's housing requirement. The remainder of the borough's housing requirement will be delivered on non-allocated sites as set out in the Spatial Strategy (Policy S1) and these sites are sourced from the LAA and are detailed in Appendix 2 of this document).
- 5.6 The council is working with key infrastructure providers, including Surrey County Council as the Highway Authority and Education Authority, Clinical Commissioning Groups and utility providers to determine exactly what infrastructure is required to support the site allocations. Additional information will become available as the Local Plan progresses, however where specific infrastructure requirements have been identified for specific sites they are detailed.
- 5.7 Each proposed allocation is considered by a series of headings:
  - What is the site to be allocated for? This identifies the use and quantum of development.
  - Summary reason for allocation: This explains why the site is being proposed as an allocation.
  - When will the site be developed? This identifies when the site will be delivered in line with the phasing policy.
  - Key information: This identifies the Land Availability Assessment reference, Ward, site area and current land use.

- Site map: This identifies the site boundary.
  - Site Constraints and mitigation: This identifies key constraints and how they can be overcome
  - Infrastructure requirements: This identifies any site-specific infrastructure requirements known at this stage.
  - Availability: This identifies if confirmation of site availability has been received.
  - Deliverability: This identifies any known issues which might affect the site being developed.
  - Key supporting documents: This section sets out the information that has informed the policy, such as the published evidence base.
  - What existing policy does this supersede? This identifies which current development plan policies that the strategic policy will replace or if it is a new policy.
  - Monitoring the policy: This sets out the monitoring indicator and the sources of data. These will be used to inform and produce the Authority Monitoring Report.
- 5.8 Further sites for any land use can be suggested to the council during this consultation. Any suggestions received will need to be assessed and considered further and could result in a change to the proposed sites.
- 5.9 If you have a site to suggest, please complete the 'Call for sites' form which is available alongside this consultation.

## Site SA1 – Hook Road Car Park and SGN Site

### What is the site to be allocated for?

- 5.10 The site is allocated for a comprehensive residential led mixed use development, comprising:
- At least 640 new homes
  - Student Accommodation (potential for about 400 student rooms)
  - Mixed use ground floor active frontages accommodating space for office, retail and creative start-ups
  - Performing Arts Centre
  - Café
  - Building heights ranging between 2 and 7 storeys
  - Two-level podium parking with smart technology solution allowing different users to access spaces at different times of the day/evening
  - Provision of a new public square adjacent to the leisure centre entrance
  - A neighbourhood park in the heart of the development with direct connection to the existing Public Rights of Way network
  - Relocated SGN infrastructure
  - Improved public realm and connectivity within the site and to adjoining areas

### Summary reason for allocation

- 5.11 To regenerate this brownfield site in a highly sustainable location that is currently unattractive and underutilised. Its successful regeneration is important for the success and attractiveness of the town centre.
- 5.12 There is the opportunity to redevelop the site into a prominent, high-density, mixed-use development, which would result in an improved, attractive and better utilised environment to the eastern gateway of the town centre. New development would offer the opportunity for a better connected and rejuvenated area that would attract new residents and businesses to Epsom Town Centre.

### When will the site be developed?

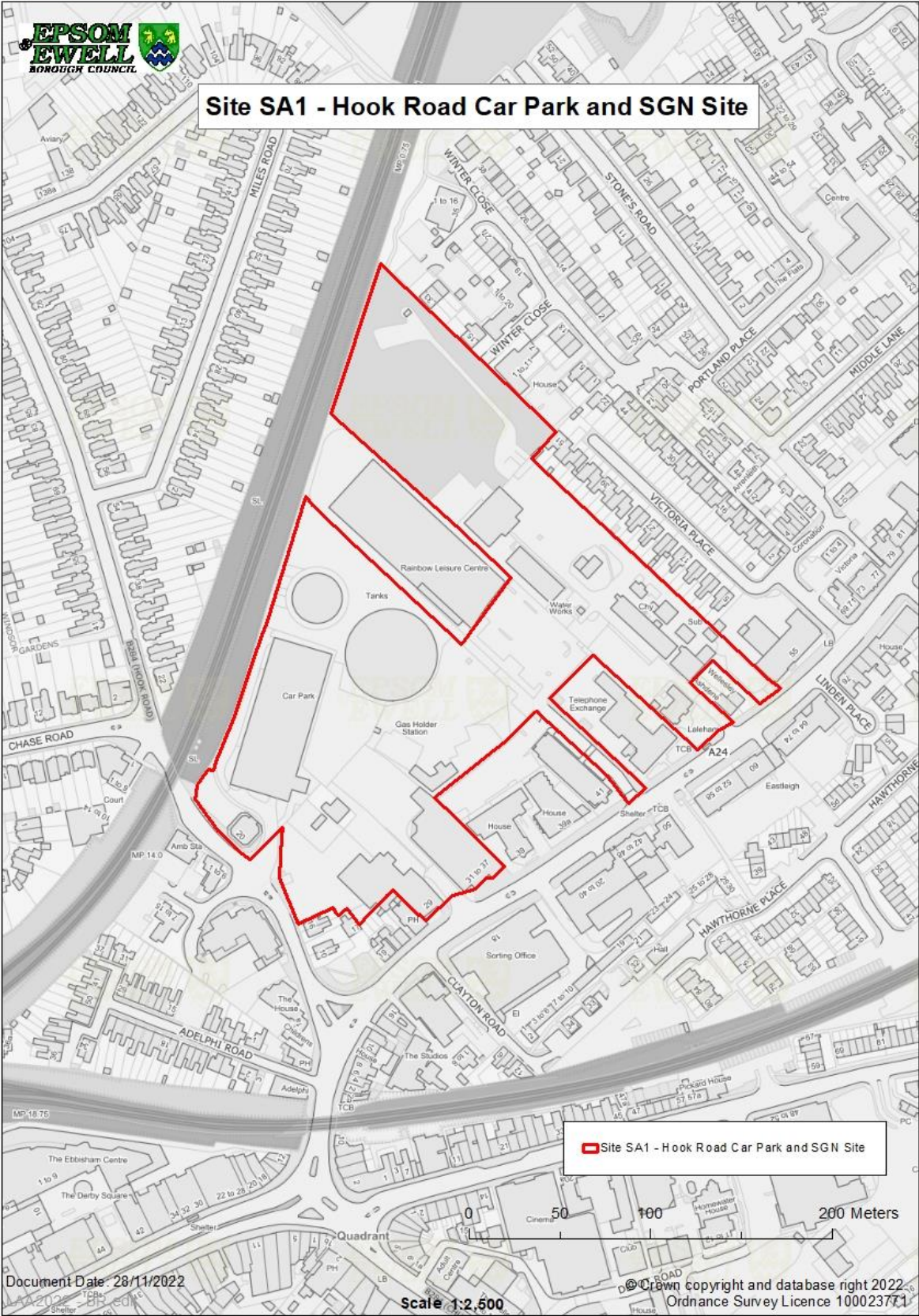
- 5.13 It expected that a planning application will be submitted for the comprehensive redevelopment of the main site in the early part of the plan period with development likely to start by 2029.

### Key information

- LAA Reference(s): TOW001, TOW014, TOW022, TOW023, TOW055, TOW056
- Site size: 4.57 ha (calculated from LAA sites, areas combined)
- Ward: Town
- Existing uses: Public Car park, retail units, education establishment, and utilities infrastructure site containing redundant gas holders.



Site map





## Site Constraints and mitigation

- The rationalisation and relocation of the existing SGN infrastructure
- The wider site adjoins Adelphi Road and Linton Lane Conservation Area. It is also in the vicinity of a number of listed buildings. Therefore, any new development should be sensitively designed taking this into account.
- The site boundary to the north adjoins the railway line, therefore noise disturbance will need to be considered and addressed.
- Part within Area of High Archaeological potential, therefore this need to be investigated.
- Potential ground contamination to be investigated and adequate remediation to enable mixed use development including residential use.
- Loss of public car parking.
- Potential to improve pedestrian and cycle connectivity including from the site to the town centre and leisure uses to the East.
- Any development proposal will need to incorporate mitigation relating to surface water flooding for those parts of the site that are susceptible.
- Retained warehouse in the middle of the scheme creates a 'void' in the development, and does not allow for even height distribution

## Specific Infrastructure requirements

5.14 The development of the site will require:

- the rationalisation and relocation of the existing Southern Gas Networks Infrastructure within the site boundary
- the rationalisation of water utilities infrastructure
- the re-provision of some vehicle parking public parking that utilises smart technology to manage demand and usage
- provision of a new public square and neighbourhood park

## Availability

5.15 The site is available now.

## Deliverability

- 5.16 The Hook Road Car Park site is owned by the council and is being promoted for development.
- 5.17 The neighbouring utilities sites is owned by Southern Gas Networks who have a development partner appointed.

## Key supporting documents

- Emerging Epsom Town Centre Masterplan (2022)
- Land Availability Assessment (2022)
- Sustainability Appraisal (2023)
- Habitats Regulations Assessment (2023)
- Local Plan Viability Study (2022)

**What existing policy does this supersede?**

- Plan E, Epsom Town Centre Area Action Plan. Policy E15, The Utilities Site

**Monitoring the policy**

Indicator	Data source(s)
Number of residential dwellings permitted and completed	Planning decisions and appeals
Amount of employment floorspace permitted and completed	Monitoring data

**Site SA2 –Town Hall, Hope Lodge & Epsom Clinic****What is the site to be allocated for?**

- 5.18 The site is allocated for residential development, comprising:
- A new residential area focussed around Dulshot Green
  - At least 90 new homes
  - The total redevelopment of Town Hall, Hope Lodge Car Park and Epsom Clinic
  - Building heights ranging between 2 and 4 storeys
  - The re-provision of some public parking on the Town Hall site

**Summary reason for allocation**

- 5.19 The sites provide the opportunity of making a more efficient use of land in a highly sustainable location that is currently underutilised. Its successful regeneration will attract new residents and businesses to the town centre.

**When will the site be developed?**

- 5.20 It is expected that the redevelopment of the area will involve several planning applications based on a comprehensive scheme for the whole area. Planning applications are likely to be submitted early in the plan period with development likely to start by 2028.

**Key information**

- LAA Reference(s): TOW006, TOW009, TOW011, TOW021
- Site size: 1.61 ha (calculated from LAA sites, areas combined)
- Ward: Town
- Existing use: Town Hall and surface level public car parks



### **Site Constraints and mitigation**

- The site lies adjacent to Church Street and Epsom Town Centre Conservation Areas. It is also in the vicinity of several listed buildings. Therefore, sympathetic design is required.
- Some of the trees within and very near site are protected by Tree Preservation Orders.
- The site is within an Area of High Archaeological potential.
- Potential to improve pedestrian and cycle connectivity including from the site to the town centre.
- Any development proposal will need to incorporate mitigation relating to surface water flooding for those parts of the site that are susceptible.

### **Specific Infrastructure requirements**

5.21 The development of the site will require:

- Improvements to Dulshott Green public open space
- Public realm improvements within the site boundaries and beyond that incorporate improved pedestrian and cyclist infrastructure
- The provision of public vehicle parking

### **Availability**

5.22 The site is available.

### **Deliverability**

5.23 The Town Hall and Hope Lodge Car Park is owned by the council and is being promoted for development. The Epsom Clinic and parking lot to rear is owned and being promoted for development by NHS Property Services, while the former Epsom Police Station and Ambulance Station is under private ownership.

### **Key supporting documents**

- Emerging Epsom Town Centre Masterplan (2022)
- Land Availability Assessment (2022)
- Sustainability Appraisal (2023)
- Habitats Regulations Assessment (2023)
- Local Plan Viability Study (2022)

### **What existing policy does this supersede?**

- Plan E, Epsom Town Centre Area Action Plan. Policy E17, Other Opportunity sites: Site g: Emergency Service Uses, Site j: Town Hall Square and car park.

**Monitoring the policy**

Indicator	Data source(s)
Number of residential dwellings permitted and completed	Planning decisions and appeals

**Site SA3 –Depot Road and Upper High Street****What is the site to be allocated for?**

- 5.24 The site is allocated for residential development, comprising:
- At least 100 new homes
  - The re-provision of public parking by the provision of a decked car park including 1x basement level and 4x above ground levels on Depot Road.
  - New access road
  - Building heights ranging between 2 and 4 storeys

**Summary reason for allocation**

- 5.25 There is an opportunity to make more efficient use of well-located town centre land by re-providing car parking in a decked structure, releasing land for new homes.
- 5.26 Its successful regeneration will attract new residents and businesses to the town centre.

**When will the site be developed?**

- 5.27 It is expected that a planning application will be submitted for the comprehensive redevelopment of the main site in the early part of the plan period with development likely to start by 2027.

**Key information**

- LAA Reference(s): TOW004
- Site size: 1.24 ha
- Ward: Town
- Existing use: Surface level public car parks



Site map



**Site Constraints and mitigation**

- The site lies adjacent to Pikes Hill Conservation Area and near Church Street and Epsom Town Centre Conservation Areas. It is also in the vicinity of several listed buildings. Therefore, sympathetic design is required.
- While there are no trees within the site protected by Tree Preservation Orders (TPOs), there are two TPO trees in close proximity. Proposals should seek to limit the impact on these trees.
- A small portion of the site (to the south-west) is within an Area of High Archaeological potential, therefore this needs to be investigated.
- Potential to improve pedestrian and cycle connectivity within and beyond the site.
- Any development proposal will need to incorporate mitigation relating to surface water flooding for those parts of the site that are susceptible.

**Specific Infrastructure requirements**

5.28 The development of the site will require:

- Public realm improvements within the site boundary and beyond that incorporate improved pedestrian and cyclist infrastructure
- The provision of a decked public car park

**Availability**

5.29 The site is available.

**Deliverability**

5.30 The Upper High Street and Depot Road Car Parks are owned by the council and is being promoted for development.

**Key supporting documents**

- Emerging Epsom Town Centre Masterplan (2022)
- Land Availability Assessment (2022)
- Sustainability Appraisal (2023)
- Habitats Regulations Assessment (2023)
- Local Plan Viability Assessment (2022)

**What existing policy does this supersede?**

- Plan E, Epsom Town Centre Area Action Plan. Policy E17, Other Opportunity sites: Site g: Emergency Service Uses, Site j: Town Hall Square and car park.

**Monitoring the policy**

Indicator	Data source(s)
Number of residential dwellings permitted and completed	Planning decisions and appeals

## Site SA4 – Ashley Centre & Global House

### What is the site to be allocated for?

- 5.31 The site is allocated for mixed use development, comprising:
- The retention and refurbishment of the Ashley Centre
  - The redevelopment of Global House to provide at least 70 homes
  - Building heights between 5-8 storeys
  - Retention of the Playhouse
  - Maintaining existing planting and green verge along Ashley Avenue
  - Retention of the Multi Storey Public Car Park
- 5.32 There is the opportunity for the comprehensive refurbishment of the Ashley Centre, the shopping centre in Epsom Town Centre. The redevelopment of Global House to the south of the site alongside the refurbishment of the Ashley Centre offers the potential for an upgraded retail environment, improved facilities, and a better utilised site, with the provision of housing.

### Summary reason for allocation

- 5.33 The site provides an opportunity to make more efficient use of land in a highly sustainable location. The Ashley Centre makes a valuable contribution towards the town centres retail offer and the council wishes to encourage the refurbishment of the centre to attract new tenants and maintain its vitality and viability. The redevelopment of Global House to provide additional housing will make a valuable contribution towards meeting housing needs. The successful regeneration of this site will attract new residents and businesses to the town centre.

### When will the site be developed?

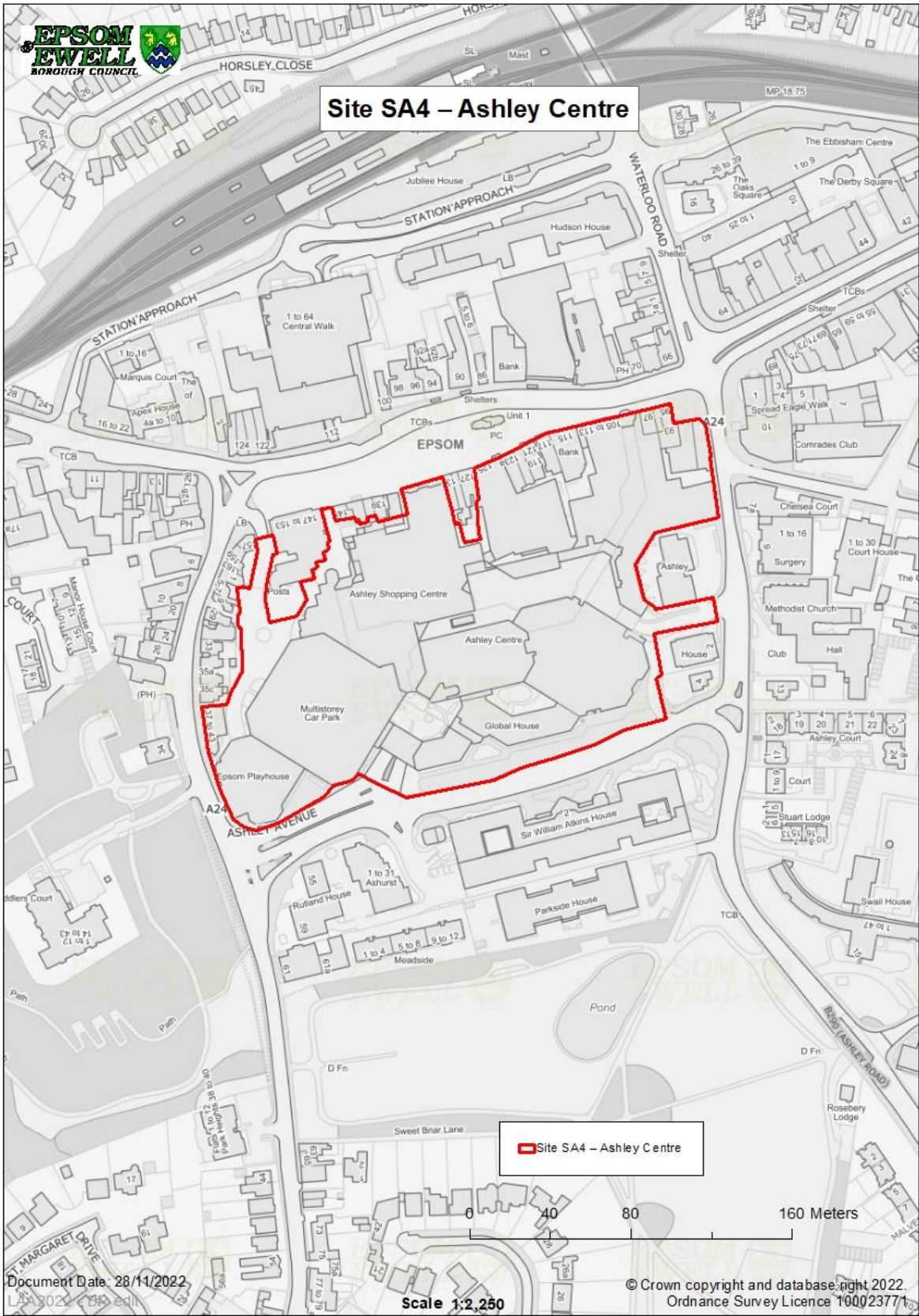
- 5.34 The council expects that a planning application will be submitted in the early part of the plan period. The development of new housing is expected to start in 2027.

### Key information

- LAA Reference(s): TOW024
- Site size: 3.19 ha
- Ward: Town
- Existing use: Mall, multistorey car park and offices to the rear.



Site map



**Site Constraints and mitigation**

- The site adjoins the Town Centre Conservation Area and several Listed buildings. Therefore, sympathetic design is required.
- The site is within Area of High Archaeological potential, therefore this need to be investigated.
- The site includes a well used multistorey car park that serves the town centre and may be required to be re-provided. This will need to be investigated.
- The site will likely need to continue operating throughout any construction stage(s), development will need to be carefully phased, and retail use, parking, servicing issues carefully coordinated.
- Potential ground contamination to be investigated and adequately mitigated for residential development
- Potential to improve pedestrian and cycle connectivity including from the site to the town centre

**Specific Infrastructure requirements**

5.35 The development of the site will require:

- Public realm improvements along Ashley Avenue that enhance the existing green infrastructure.

**Availability**

5.36 The site is available.

**Deliverability**

5.37 The site is part owned by the council and part privately owned and is being promoted for redevelopment.

**Key supporting documents**

- Epsom Town Centre Masterplan (2022)
- Land Availability Assessment (2022)
- Sustainability Appraisal (2023)
- Habitats Regulations Assessment (2023)
- Local Plan Viability Study (2022)

**What existing policy does this supersede?**

- Plan E, Epsom Town Centre Area Action Plan. Policy E17, Other Opportunity sites: Site 17e Global House, Ashley Avenue

**Monitoring the policy**

Indicator	Data source(s)
Number of residential dwellings permitted and completed	Planning decisions and appeals

## Site SA5 – Land at West Park Hospital

### What is the site to be allocated for?

- 5.38 The site is allocated for residential development, comprising:
- approximately 150 dwellings
  - A target of 5% of homes to be provided through the provision of serviced plots of land for self-build and/or custom-build homes
  - Floorspace to support NHS services (if required)

### Summary reason for allocation

- 5.39 The site will contribute towards meeting the need for housing in the borough.
- 5.40 The site comprises of two parcels north and south of existing West Park Hospital residential area. The areas are currently previously developed land within the Green Belt, consisting of buildings that are currently in use as part of the original West Park Hospital operation which are no longer fit for purpose.
- 5.41 The site lies adjacent to existing residential creating a suitable context for residential development and lowering the risk of adverse landscape impacts.

### When will the site be developed?

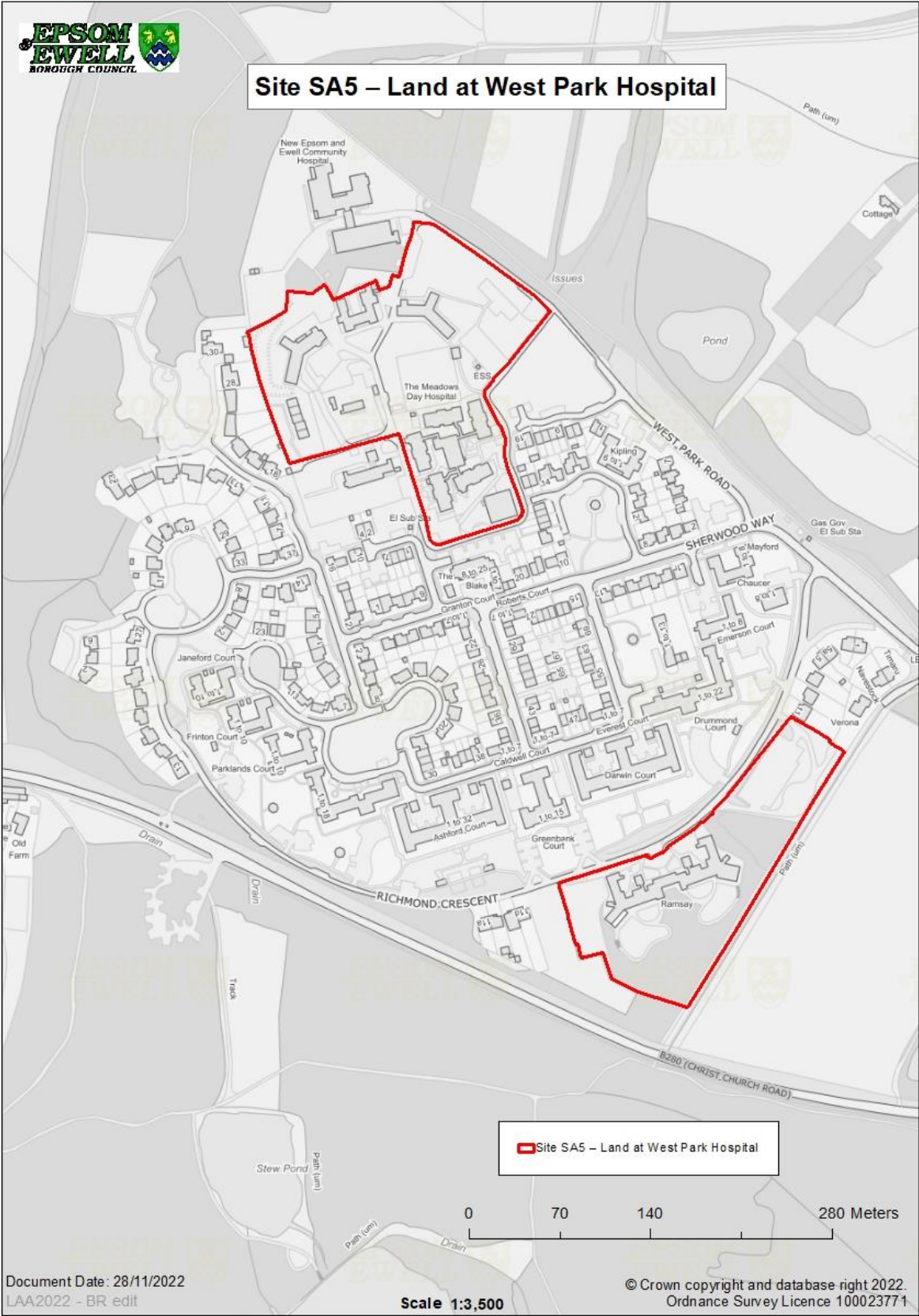
- 5.42 It expected that a planning application will be submitted in the early part of the plan period with development likely to start by 2027.

### Key information

- LAA Reference: STA017 and STA018
- Site size: STA017 (1.93 ha) and STA018 (3.11 ha)
- Ward: Stamford
- Existing use: West Park Hospital operations



Site map



**Site Constraints and mitigation**

- Northern parcel is adjacent West Park Conservation Area and Southern parcel is within the Conservation Area therefore any proposal should ensure it is sensitively designed to reflect the parkland setting
- Maximise the linkages between the site and surrounding area; and provide opportunities for walking and cycling.
- Development should not adversely affect the Protected Trees within and on the boundaries of the of the site.
- Work with the topography of the site to ensure that visual impacts of development are minimised.
- Development proposal to focus the built form to the north of the site to preserve the undeveloped (open) land to the south.
- Any development proposal will need to incorporate mitigation relating to surface water flooding for those parts of the site that are susceptible.

**Specific Infrastructure requirements**

- 5.43 The NHS may require the provision of some floorspace for healthcare needs, however there is currently no certainty as to whether there will be a need for such floorspace.

**Availability**

- 5.44 The site is confirmed as available.

**Deliverability**

- 5.45 The site is in single ownership
- 5.46 A Local Plan viability assessment has been prepared to support the draft Local Plan. The initial findings of this work indicate that the development of this site is viable when taking account of potential sales values and costs associated with development (including the provision of affordable housing). Further detailed viability work will be undertaken as the Local Plan progresses.
- 5.47 The site is considered to be developable as it is located in a suitable location for housing development, the site is confirmed as available and could be viably developed at the point envisaged.

**Key supporting documents**

- Land Availability Assessment (2022)
- Sustainability Appraisal (2023)
- Habitats Regulations Assessment (2023)
- Local Plan Viability Study (2022)
- Green Belt Study (Part 1) (2022)

**What existing policy does this supersede?**

- Development Management Policies Document - Policy DM2: Infilling within the boundaries of Major Developed Sites

**Monitoring the policy**

Indicator	Data source(s)
Number of residential dwellings permitted and completed	Planning decisions Monitoring data

**Site SA6 – Horton Farm (Greenfield)****What is the site to be allocated for?**

- 5.48 The site is allocated for a residential led development, comprising:
- A minimum of 1,500 net zero carbon dwellings
  - A target of 5% of homes to be provided through the provision of serviced plots of land for self-build and/or custom-build homes
  - A minimum of 10 serviced gypsy and traveller pitches
  - Public open space
  - Green corridor / habitat enhancements

**Summary reason for allocation**

- 5.49 The site will contribute towards meeting the need for housing in the borough, including making a significant contribution towards the delivery of affordable housing and in meeting the needs of the boroughs Gypsy and Traveller population to create a new community.
- 5.50 The site has well defined boundaries and lies adjacent to existing residential areas, creating a suitable context for residential development and lowering the risk of adverse landscape impacts. The site is also located close to local services and facilities and to bus and rail transport connections. Vehicular access can be achieved without detriment to the character of the local area.

**When will the site be developed?**

- 5.51 The site is expected to be developed from 2028/29.

**Key information**

- LAA Reference: COU023
- Site size: 37.89 ha
- Ward: Court
- Existing use: Agricultural, farm, riding school and stables (open space)

Site map



## **Site Constraints and mitigation**

- The majority of the site is bordered by existing residential areas. New access points should maximise the opportunities for improved connectivity and linkages in and around the area, in particular for walking and cycling.
- Development should not adversely affect any protected trees within and on the boundaries of the site.
- The design of development would need to minimise impacts on the Site of Nature Conservation Importance (SNCI) located to the north-west of the site.
- Any development proposal will need to incorporate mitigation relating to surface water flooding for those parts of the site that are susceptible.
- Development should work with the topography of the site to ensure that visual impacts of development are minimised.
- Horton Farm House is a listed building in the south-east of the site. Therefore, sympathetic design is required.

## **Specific Infrastructure requirements**

5.52 The development of the site will require:

- New highways access to the West and East
- Improved pedestrian and cycle infrastructure

## **Availability**

5.53 The site is confirmed as available

## **Deliverability**

5.54 The site is in single ownership and a developer has an option on the land.

5.55 A Local Plan viability assessment has been prepared to support the draft Local Plan. The initial findings of this work indicate that the development of this site is viable when taking account of potential sales values and costs associated with development (including the provision of affordable housing). Further detailed viability work will be undertaken as the Local Plan progresses.

5.56 The site is considered to be developable as it is in a suitable location for housing development, the site is confirmed as available and could be viably developed at the point envisaged.

## **Key supporting documents**

- Land Availability Assessment (2022)
- Sustainability Appraisal (2023)
- Habitats Regulations Assessment (2023)
- Local Plan Viability Study (2022)
- Green Belt Study (Part 1) (2022)

## **What existing policy does this supersede?**

- New Allocation.



**Monitoring the policy**

Indicator	Data source(s)
Number of residential dwellings permitted and completed	Planning decisions Monitoring data

**Site SA7 – Land at Chantilly Way (Greenfield)****What is the site to be allocated for?**

- 5.57 The site is allocated for a residential development, comprising at least 25 net zero carbon dwellings

**Summary reason for allocation**

- 5.58 The site will contribute towards meeting the need for housing in the borough and lies adjacent to the Strategic Allocation at Horton Farm (Policy SA6).
- 5.59 The site has well defined boundaries and lies on a transport corridor adjacent to existing residential area, creating a suitable context for residential development. The site is also in relatively close proximity to local services and facilities and to public transport connections.

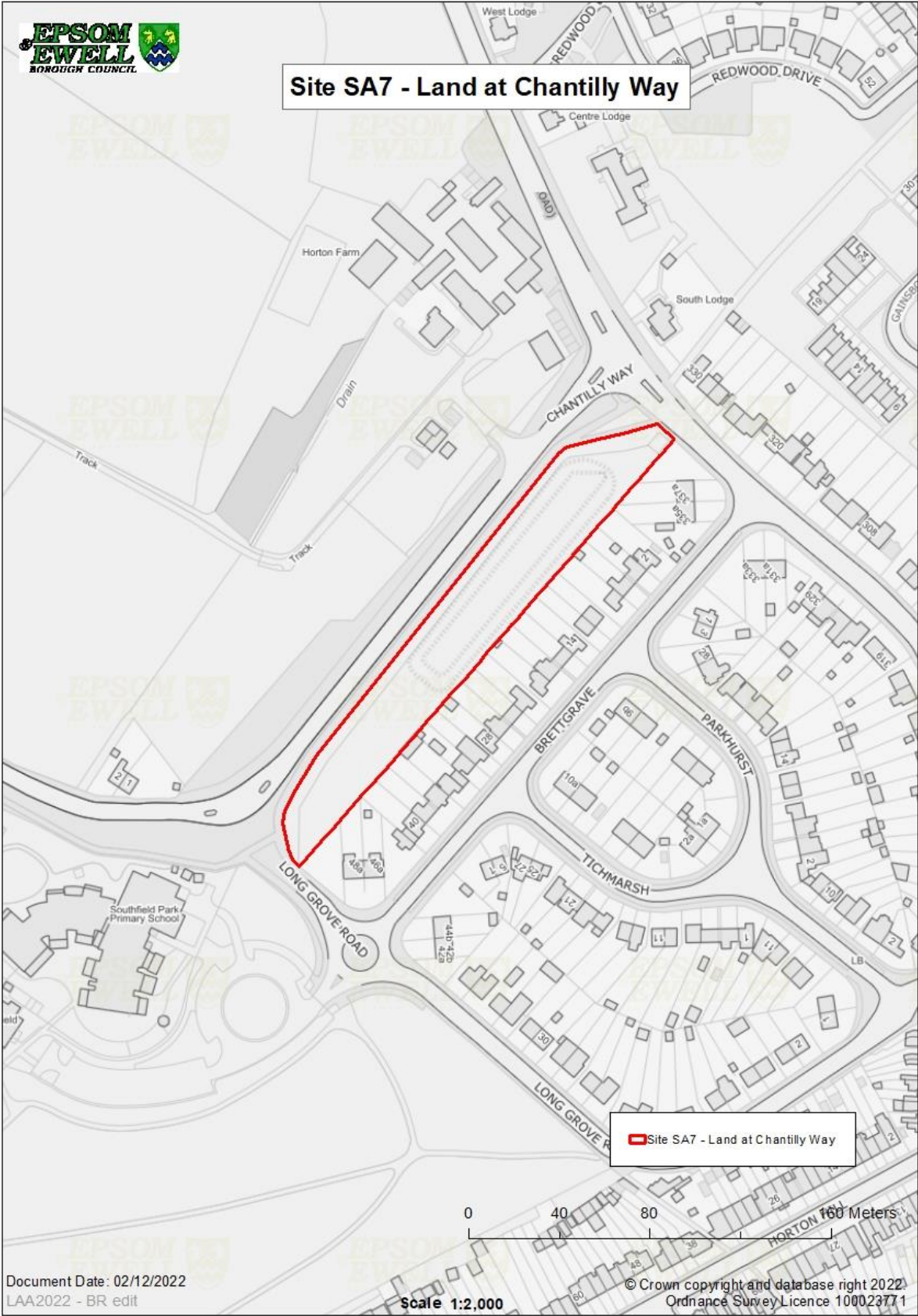
**When will the site be developed?**

- 5.60 It expected that a planning application will be submitted in the early part of the plan period with development likely to start by 2028.

**Key information**

- LAA Reference: COU024
- Site size: 0.7ha
- Ward: Court
- Existing use: Open field / grazing land

Site map



**Site Constraints and mitigation**

- Development should not adversely affect any protected trees near the boundary of the site.
- Any development proposal will need to incorporate mitigation relating to surface water flooding for those parts of the site that are susceptible.

**Infrastructure requirements**

- 5.61 The council is working with key infrastructure providers, including Surrey County Council as the Highway Authority and Education Authority, Clinical Commissioning Groups and Utility providers to determine exactly what infrastructure is required to support the proposed development.

**Availability**

- 5.62 The site is confirmed as available.

**Deliverability**

- 5.63 The site is in single ownership and the developer of this site is promoting it for redevelopment.
- 5.64 A Local Plan viability assessment has been prepared to support the draft Local Plan. The initial findings of this work indicate that the development of this site is viable when taking account of potential sales values and costs associated with development (including the provision of affordable housing). Further detailed viability work will be undertaken as the Local Plan progresses.
- 5.65 The site is considered to be developable as it is in a suitable location for housing development, the site is confirmed as available and could be viably developed at the point envisaged.

**Key supporting documents**

- Land Availability Assessment (2022)
- Sustainability Appraisal (2023)
- Habitats Regulations Assessment (2023)
- Local Plan Viability Study (2022)
- Green Belt Study (Part 1) (2022)

**What existing policy does this supersede?**

- New Allocation.

**Monitoring the policy**

Indicator	Data source(s)
Number of residential dwellings permitted and completed	Planning decisions Monitoring data

## **Site SA8 – Land adjoining Ewell East Station (Greenfield)**

### **What is the site to be allocated for?**

5.66 The site is allocated for a residential led development, comprising:

- At least 350 net zero carbon dwellings
- Building heights up to 6 storeys
- New local retail provision at ground floor
- The re-provision of the playing pitches at Hook Road Arena

### **Summary reason for allocation**

5.67 The site will contribute towards meeting the need for housing in the borough and ancillary community infrastructure.

5.68 The site has well defined boundaries and lies adjacent to existing residential areas and adjoining Ewell East railway station, creating a suitable context for residential development and lowering the risk of adverse landscape impacts. The site is also in relatively close proximity to local services and facilities and to bus and rail transport connections. Vehicular access can be achieved without detriment to the character of the local area.

### **When will the site be developed?**

5.69 It expected that a planning application will be submitted in the middle of the plan period with development likely to start by 2031 once new sports pitches have been provided.

### **Key information**

- LAA Reference: NON013
- Site size: 8.63 ha
- Ward: Nonsuch
- Existing use: Sports pitches and open space



Site map



## **Site Constraints and mitigation**

- Development proposals must identify ways of improving pedestrian access to Ewell East Station and maximise the linkages between the site and surrounding area, and provide opportunities for walking and cycling.
- The design of development would need to minimise impacts on Priest Hill Nature Reserve (Site of Nature Conservation Importance (SNCI)) located on the Southern Boundary of the site.
- Part of the site to the east along Cheam Road is within Flood Zone 3. Any development proposal will need to take this into account.
- The development proposal will need to work with the topography of the site to ensure that visual impacts of development are minimised

## **Specific Infrastructure requirements**

- 5.70 Provision of new retail unit(s) to provide convenience retail to meet local needs.
- 5.71 The loss of playing pitches will require re-provision at the Hook Road Arena site (Policy SA9). The developer will be expected to re-provide the playing pitches off site prior to development commencing to ensure that the scheme is acceptable in planning terms.

## **Availability**

- 5.72 The site is confirmed as available.

## **Deliverability**

- 5.73 The site is in single ownership and the developer of this site is promoting it for redevelopment.
- 5.74 A Local Plan viability assessment has been prepared to support the draft Local Plan. The initial findings of this work indicate that the development of this site is viable when taking account of potential sales values and costs associated with development (including the provision of affordable housing). Further detailed viability work will be undertaken as the Local Plan progresses.
- 5.75 The site is considered to be developable as it is in a suitable location for housing development, the site is confirmed as available and could be viably developed at the point envisaged.

## **Key supporting documents**

- Land Availability Assessment (2022)
- Sustainability Appraisal (2023)
- Habitats Regulations Assessment (2023)
- Local Plan Viability Study (2022)
- Green Belt Study (Part 1) (2022)

## **What existing policy does this supersede?**

- New Allocation.

**Monitoring the policy**

Indicator	Data source(s)
Number of residential dwellings permitted and completed	Planning decisions Monitoring data

**Site SA9 – Hook Road Arena (Greenfield)****What is the site to be allocated for?**

- 5.76 The site is allocated for residential and sports and recreation development, comprising:
- A new sports hub for the borough to include playing pitches (grass and artificial) a new pavilion and changing facilities on 9.5ha of the site that will be retained within the Green Belt.
  - At least 150 net zero carbon homes on the eastern part of the site that will be inset from the Green Belt

**Summary reason for allocation**

- 5.77 This site has the potential to deliver recreational sports facilities and playing pitches. The allocation of this site will mitigate any losses of playing pitches (rugby) resulting from the allocation of site SA8 - Land adjoining Ewell East Station. It may also help to meet additional playing pitch needs for 'secure provision' (i.e. community use is protected through a legal agreement) both now and in the future.
- 5.78 The site will contribute towards meeting the need for housing in the borough.

**When will the site be developed?**

- 5.79 It is expected that a planning application will be submitted early in the plan period, with development likely to start in 2027.

**Key information**

- LAA Reference: COU026
- Site size: 14 ha Ward: Court
- Existing use: Open Space/Events venue for car boot sales & fireworks displays

Site map





**Site constraints and mitigation**

- Any development proposal will need to incorporate mitigation relating to surface water flooding for those parts of the site that are susceptible.

**Infrastructure requirements**

- 5.80 The site could deliver playing pitches and potentially other supporting infrastructure such as changing facilities and a club house.

**Availability**

- 5.81 The site is confirmed as available

**Deliverability**

- 5.82 The site is owned by the council.
- 5.83 As yet, no viability assessments have been undertaken by the council to develop the site for this use.

**Key supporting documents**

- Land Availability Assessment (2022)
- Sustainability Appraisal (2023)
- Habitats Regulations Assessment (2023)
- Local Plan Viability Study (2022)
- Green Belt Study (Part 1) (2022)
- Playing Pitch Strategy (2021)

**Monitoring the policy**

Indicator	Data source(s)
Number of playing pitches provided	Planning decisions Monitoring data

## 6 Homes for all

### Policy S6: Housing Mix and Type

#### Why we need the policy

- 6.1 Providing an appropriate mix of housing types and tenures is a vital part of creating sustainable communities and meeting the diverse needs of all people within the borough. The council must plan for a mix of housing, based on current and demographic trends, market trends and the needs of different groups in the community, including older people, people with disabilities and those wishing to build their own homes.
- 6.2 Housing needs have been assessed through the Housing and Economic Development Needs Assessment (HEDNA) (2022). Household needs within the borough are varied and include requirements for singles, couples, families, the young, older people, as well as a requirement for affordable housing.
- 6.3 The HEDNA (2022) identifies that the proportion of households with dependent children in the borough is slightly higher (2.78%) than the England average. This suggests the borough is a relatively attractive place to bring up children. In addition, there is expected to be an increase in the number of households with dependent children, especially with three or more children. Given the tendency for family households to occupy 3-bedroom housing, it is reasonable to expect continued strong demand for 3+ bedroom homes in the borough. There is, however, widespread (72%) under-occupation of homes (occupancy rating of 2 or more bedrooms) in the borough for households aged 65 and over. Finally, there is a greater proportion of households in the borough living in smaller units in the private rented and Social Rented sectors than the England average.
- 6.4 The borough will have to plan for a growth in the number of elderly households and this will commensurately increase the need for both housing to accommodate such households, as well as potentially residential care solutions. There are also various households with special needs including disabled people with physical and/or sensory impairments, learning difficulties and mental health needs.

#### Policy S6: Housing mix and type

- 1) Proposals for new housing will be permitted where they meet a range of accommodation needs in the borough through the provision of a mix of tenure, type and size of dwellings that:
  - a) reflects the housing need, set out in Table S6a below or any subsequent update to the HEDNA (2022); and
  - b) has regard to the size, characteristics and location of the site.

**Implementing the policy**

- 6.5 To provide a balanced housing market and to deliver the right homes addressing our local need, this policy will be applied to all housing developments.
- 6.6 Based on the latest evidence Housing and Economic Development Needs Assessment (HEDNA), it is important that new housing development focuses on providing an appropriate mix of affordable and market homes. The HEDNA (2022) recommends the following mix of affordable and market homes for future developments in the borough:

<b>Table S6a: Housing Mix</b>				
<b>Tenure</b>	<b>1-bedroom</b>	<b>2-bedrooms</b>	<b>3-bedrooms</b>	<b>4+ bedrooms</b>
<b>Market</b>	10%	35%	35%	20%
<b>Affordable home ownership</b>	20%	40%	30%	10%
<b>Affordable housing (rented)</b>	40%	35%	20%	5%

**Key supporting documents**

- Housing and Economic Development Needs Assessment (2022)

**Which existing policy / policies does this supersede?**

- Development Management Policies Document - Policy DM 22: Housing Mix

**Monitoring the Policy**

<b>Indicator</b>	<b>Data source(s)</b>
Number of dwellings provided by type	Planning decisions and appeals Monitoring data
Size of dwellings (number of bedrooms) for completed dwellings with a split by tenure type	

## Policy S7: Affordable Housing

### Why we need the policy?

- 6.7 Housing affordability is a significant issue for Epsom and Ewell and is a key priority for the council.
- 6.8 The ratio of median wages to median house prices is amongst the highest in England, leading to people working in Epsom and Ewell having difficulty in affording to rent or buy a home in the same area.
- 6.9 As a result, too many young people and families are moving out of the borough to have a realistic prospect of owning or renting their own home. Our older residents struggle to downsize affordably in a way that enables them to continue to live independently or with care packages, and to remain in their communities.
- 6.10 The cost of housing and reliance on people travelling into the borough is also making it difficult for local business and valued services to attract and retain employees, including essential key workers, such as teachers and health care providers. In-commuting also places added pressure on the road network impacting on congestion and air quality, the causes of climate change.
- 6.11 A robust affordable housing policy is required in order to ensure the development of balanced and integrated communities and to deliver good quality, affordable housing for local people for present and future generations.

### Policy S7: Affordable Housing

- 1) The council will require proposals to provide affordable homes on all residential developments comprising self-contained units, as follows:
  - a. On brownfield sites of 10 or more new units or where the site has an area of 0.5 hectares or more, on-site provision of 30% affordable housing of the gross number of dwellings;
  - b. On greenfield sites of 10 or more new units or where the site has an area of 0.5 hectares or more, on-site provision of 40% affordable housing of the gross number of dwellings;
- 2) Where a development meets the criteria detailed in 1), affordable housing shall be delivered in accordance with the following criteria:
  - c. 25% of affordable housing will be provided as First Homes with a minimum discount of 30% below market prices;
  - d. The mix of tenure for the remaining 75% of affordable housing must reflect local needs and must be affordable having regard to local incomes and house rents and/or prices;

- e. Commuted sums will be charged for any fractional number of affordable units to be provided on site equivalent to that part of the residential dwelling;
- f. On site affordable housing should be dispersed throughout the site, unless there are specific circumstances or benefits that would warrant a different approach. Market and affordable homes on sites should be indistinguishable and achieve the same high-quality design.
- g. Affordable housing shall be provided on-site. Only where it can be demonstrated that exceptional circumstances exist will provision off-site be allowed or the payment of a financial contribution made (equivalent in value to it being provided on-site).
- h. Where a site has been sub-divided or is not being developed to its full potential, so as to circumvent the affordable housing threshold for on-site provision, the council will seek a level of affordable housing provision that would have been achieved on the site as a whole had it come forward as a single scheme
- i. Viability will only be considered a constraint in exceptional circumstances and where there are significant additional costs not anticipated through the Local Plan process. In order to demonstrate viability constraints to the council's satisfaction, proposals must be supported by an independent viability assessment on terms agreed by the local planning authority and funded by the developer/applicant. If it can be justified that the affordable housing requirements set out in this policy cannot be met the council may include a review clause in a s106 agreement.

#### **Vacant building credit**

- 3) The council will promote the re-use or redevelopment of existing buildings by applying a vacant building credit such that affordable housing requirements will only apply to the net increase in gross floor space resultant from development of buildings which have been:
  - j. vacant for a period of at least eighteen months prior to the granting of planning permission; and
  - k. marketed for their lawful use (or uses which could be lawful under the Town and Country Planning (General Permitted Development) (England) Order 2015 or subsequent Order) throughout the period they have been vacant.

#### **Implementing the policy**

- 6.12 Affordable housing is defined in Annex 2 of the NPPF as (headline summary) - "housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)"
- 6.13 It is national policy that a minimum of 25% of all affordable housing units must be First Homes. First Homes are a specific kind of discounted market sale housing available for first time buyers which must be discounted by a minimum of 30%

against the market value. The discount is to be retained in perpetuity through a restriction registered on the title at HM Land Registry and the first sale of the property must be at a price no higher than £250,000 once the discount has been applied.

- 6.14 In order to purchase a First Home, buyers must meet the following eligibility criteria in addition to any local connection criteria adopted by the council:
- 1) All purchasers must be first time buyers as defined in paragraph 6 of Schedule 6ZA of the Finance Act 2003 for the purpose of Stamp Duty Relief.
  - 2) Purchasers must have a combined annual household income of no more than £80,000.
  - 3) Purchasers should have a mortgage or home purchase plan to fund a minimum of 50% of the discounted price.
- 6.15 The exact tenure mix should be informed by and be compatible with the latest government guidance, the Housing and Economic Development Needs Assessment (2022) or any subsequent update, any other relevant information (such as housing waiting lists for affordable housing) and be informed by discussion with the council.
- 6.16 Affordable homes must be integrated within proposed developments to help build and maintain balanced and mixed communities in Epsom and Ewell. However, the feasibility of managing and maintaining the affordable homes will also be given consideration when assessing the acceptability of their siting and distribution.
- 6.17 It is strongly recommended that applicants and developers use the council's Pre-application Service as an opportunity to work with the council to understand the affordable housing needs in the borough in greater detail. This will be informed by the National Policy requirement for First Homes and the HEDNA and supplemented by data from the local authority's Housing Register and information provided to the council from registered social housing providers operating in the area. The additional evidence obtained through this exercise should be used to help inform the mix of affordable housing sizes and tenures in the proposal, reflecting up-to-date needs in the borough.
- 6.18 Where a developer considers that meeting the affordable housing target percentages or apportionments in this policy will be unviable, robust evidence demonstrating why it is unviable must be provided in the form of an independent viability appraisal. The evidence will be published online by the council, to ensure transparency. Where developers raise viability concerns with providing the required percentages or apportionments of affordable housing, they will be expected to meet the costs of any financial appraisals commissioned by the council, as well as their own. The council may include a review mechanism in planning obligations to ensure that viability on site can be reviewed over time.
- 6.19 In cases where viability concerns are raised, it will be necessary for negotiations between the council and the developer to take place to understand what has impacted the development's reduced viability or non-viability. As part of this process, the developer may be required to provide an independently commissioned assessment which applies the government's Development Appraisal Tool<sup>1</sup> or other equivalent tools agreed with the council in advance of the assessment.
- 6.20 In exceptional circumstances where it can be robustly demonstrated that the level of affordable housing being sought would be unviable, alternative tenure mixes and levels of affordable housing provision may be considered. In the first instance this

should seek to provide 25% First Homes and retain the same number of homes in the Subsidised Rented Affordable Housing category, with priority given to social rent, and vary the type or reduce the number of homes in the Affordable Intermediate housing category. This is because current evidence indicates that the greatest local need is for Subsidised Rented Affordable Housing.

- 6.21 The council will not accept the subdivision of sites into smaller development parcels that it considers are being partitioned in order to circumvent the affordable housing requirements of this policy, or any other policy requirements within this Local Plan. In determining whether two or more pieces of land in close proximity to each other should be considered as one site, the council will have regard to relevant information about the land, including:
1. the sites' present and historic land ownership;
  2. the planning history of the land; and
  3. whether there is a reasonable prospect of developing both sites together
- 6.22 This policy will also apply to specialist housing where the site is delivering a net gain of 10 or more self-contained units (In Use Class C3 or C2). Self-contained units are defined as 'where all the rooms (including kitchen, bathroom and toilet) in a households accommodation are behind a single door which only that household can use'. Developments that consist of single bedroom units such as purpose-built student accommodation and traditional care or nursing homes, will not be required to contribute towards affordable housing.
- 6.23 The policy should ensure that only genuinely vacant buildings benefit from the vacant building credit and thus encourage their return to use.
- 6.24 Buildings that have been made intentionally vacant, including those made redundant through estate rationalisation will not benefit from the vacant building credit.
- 6.25 Vacant building credit does not apply to abandoned buildings. There is no planning definition of abandoned buildings; however, an abandoned building cannot be marketed.
- 6.26 The threshold for a similar proposal is set to prevent applications for developments with marginal increases or decreases in floor space, or changes of use or reduction in size of non-residential floor space avoiding providing needed affordable housing.
- 6.27 Likewise, a two-year period as the definition of a recently expired permission is set to provide a disincentive to simply let an existing permission expire so that vacant building credit can be applied for thus reducing the amount of affordable housing provided.
- 6.28 Where vacant building credit is applicable to a development proposal, the full affordable housing requirements set by this policy will apply to the net increase in floor space. This means that the council will negotiate for the net increase in floor space to be for affordable housing and the current minimum requirements will apply in full.

### **Key supporting documents**

- Housing and Economic Development Needs Assessment (2022)
- Local Plan Viability Assessment (2022)

**Which existing policy / policies does this supersede?**

- Core Strategy Policy CS9 – Affordable Housing and Meeting Housing Needs

**Monitoring the Policy**

- 6.29 The following indicators and data sources will be used to monitor the effectiveness of the policy:

<b>Indicator</b>	<b>Data source(s)</b>
Number of affordable dwellings granted consent	Planning decisions and appeals
Number of planning decisions including appeals allowing a lower provision	Monitoring data
Number of affordable home completions (and as a % of total net completions)	Monitoring data
Number of households on the Housing Register	Housing register



## Policy DM1: Residential Standards

### Why we need the policy

- 6.30 It is important that new homes are built to a high standard that meet the needs of the diverse needs of the borough's residents. New homes should be comfortable, functional and adaptable. They should also minimise the impact they have on the environment and be designed to address the forecast impacts of climate change.

Policy DM1: Residential Standards
<p>Proposals for new dwellings (Use Class C3) will be permitted where:</p> <ul style="list-style-type: none"> <li>a) the internal space complies with or exceed the nationally described space standards or any future equivalent.</li> <li>b) the minimum requirements for private outdoor space as set out below are satisfied:             <ul style="list-style-type: none"> <li>i. a 5 sq m balcony within flatted development accessible from the main habitable room</li> <li>ii. a dedicated garden of 20 sq m for houses</li> </ul> </li> <li>c) major greenfield developments (10 or more units) will be designed to achieve net zero carbon</li> <li>d) all other developments will meet the Future Homes Standard (or any future standard)</li> <li>e) The building achieves a water efficiency standard of no more than 110 litres per person per day to be secured through Part G of the Building Regulations, unless it can be demonstrated that doing so is not technically feasible or would make the scheme unviable; and</li> <li>f) On sites of 10 or more new dwellings:             <ul style="list-style-type: none"> <li>a. a minimum of 10% of new market dwellings will be required to meet Building Regulations wheelchair adaptable dwellings standard (M4(3)(2)(a)); and</li> <li>b. a minimum of 20% of new affordable dwellings will be required to meet Building Regulations accessible compliance standard (M4(3)b).</li> </ul> </li> </ul>

### Implementing the policy

- 6.31 New housing should have sufficient internal space to cater for a variety of different needs. National space standards set the minimum requirements.
- 6.32 New housing will be required to provide good-quality, useable private outdoor space in the form of gardens, balconies, and/or roof terraces in accordance with the minimum requirements. Where buildings utilise roofs to provide private outdoor amenity space, the proposal should take into consideration issues of design,

overlooking and crime prevention. Where practicable, all new residential developments and residential conversions should provide step-free access and a level threshold from homes to private outdoor space. All balconies and other private external spaces must have a minimum depth and width of 1500 mm.

- 6.33 In exceptional circumstances, where site conditions make it impossible to provide private open space for dwellings, additional internal living space equivalent to the private open space requirement may be added to the minimum GIA of the dwelling, as outlined in the nationally described space standards or any future equivalent.
- 6.34 It is important that new buildings reduce the impact on climate change. The Building Regulations (Amendment) (England) Regulations 2021. *Approved Document L, Conservation of fuel and power Volume 1: Dwellings*, came into effect from 15 June 2022 and substantially increased the energy performance standards that new dwellings must adhere to. These recent uplifts to the regulations, will be further enhanced from 2025 when all new dwellings will need to meet the Future Homes standard. The council's viability study identifies that greenfield developments in the borough could deliver net zero carbon homes without impacting the deliverability of the scheme, having regard to other policies in this Plan and therefore the council is seeking these higher standards from greenfield development.
- 6.35 The Environment Agency's water stressed areas 2021 update report confirms that both water companies (Thames Water and Sutton & East Surrey Water) serving Epsom and Ewell have 'serious' water stress issues. This supports the incorporation of the tighter building regulations optional water efficiency standard. Developments should include measures to minimise water use where feasible, examples include smart metering, water saving and recycling measures, rainwater harvesting and greywater recycling.
- 6.36 New homes should be designed to be accessible to a diverse range of needs and adaptable to changing needs over time. The HEDNA (2022) recognises that there is a growing number of older people in the aging population in the borough who may have mobility issues, and need greater accessibility and support needs. It is therefore important to plan for these needs.
- 6.37 Building regulations include a mandatory requirement M4(1) Category 1 which sets out minimum access standards. In addition, there are optional requirements for higher access standards: M4(2) Category 2 for accessible and adaptable dwellings and M4(3) Category 3 for wheelchair user dwellings. Within Category 3, there is a differentiation between wheelchair adaptable dwellings (M4(3)(2)(a)) and wheelchair accessible dwellings (M4(3)(2)(b)). Building Regulation M4 (3)(2)(b) 'accessible wheelchair user dwellings' only applies to affordable housing where the council is responsible for allocating or nominating a person to live in that dwelling. The HEDNA (2022) recommends that 10% of all new market homes to be M4(3)a (adaptable) compliant and, in the affordable sector, 20% M4(3)b (accessible) compliant. Higher numbers may also be considered but in all cases, the numbers applied in policy should be viability tested.

### Key supporting documents

- Local Plan Viability Study (2022)
- Technical housing standards- nationally described space standards
- The Building Regulations Approved Document G, Sanitation, hot water safety and water efficiency

- The Building Regulations Approved Document L, Conservation of fuel and power Volume 1: Dwellings
- The Building Regulations Approved Document M, Access to and use of buildings
- Future Homes Standard

### Which existing policy / policies does this supersede?

- Development Management Policies Document – Policy DM12 Housing Standards

### Monitoring the Policy

- 6.38 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Number of schemes for residential development that do not satisfy the policy requirements	Planning decisions and appeals

## Policy S8: Specialist Housing

### Why we need the policy

- 6.39 It is important for the Local Plan to deliver suitable specialist forms of accommodation to cater for the needs of more vulnerable members of society inclusive of people with disabilities, mental health problems and long-term conditions, including those who have developed or may develop care needs as they become older.
- 6.40 By 2040 the number of those aged 65 or over in Epsom & Ewell borough is projected to be 21,107. This represents a 38% increase on 2022 figures, with the expected rate of increase of the 75 or over and 85 or over groups in the population projected to be higher, at 35% and 73% respectively. The Local Plan seeks to ensure that additions to the future housing stock reflect local need and provide housing choice.

### Policy S8: Specialist Housing

1) Development proposals for specialist accommodation, such as homes for older people, people with disabilities, or homes for other specific groups will be permitted where;

- a) there is clear and robust evidence that demonstrates a local need for the new accommodation and the type and level of care it offers;
- b) an appropriate tenure mix is provided;

- c) sites are appropriately located in terms of access to facilities, services and public transport;
- d) it will not lead to a concentration of similar uses that would be detrimental to the character and function of an area and/or residential amenity;
- e) it will not significantly impact on the capacity of public services, including health and social care;
- f) it can be demonstrated that the development is designed and managed to provide the most appropriate types and levels of support to its target resident; and
- g) it can be demonstrated that revenue funding can be secured to maintain the long-term viability of the scheme.

2) Larger-scale new residential developments will be expected to consider the incorporation of specially designed housing/specialist accommodation, in line with the above criteria.

3) Proposals that may result in the loss of specialist housing or accommodation will not be considered acceptable unless it can be demonstrated that there is no longer a need for such accommodation in the borough, or alternative provision is being made available locally through replacement or new facilities.

4) Any deviations from the above requirements will only be given favourable consideration where a developer has clearly demonstrated that such requirements will render any development proposals unviable.

### Implementing the policy

- 6.41 Provision for specialist housing (not including C3 Uses) will be welcomed within the borough where it can be shown to be contributing towards meeting an identified local need, unless this is contrary to other planning policies. Specialist housing may be required, but not limited to, meeting the needs of older people, people with physical disabilities, people recovering from mental illness, people with limited mobility, and people with a learning disability. This could be achieved by providing a range of different types of housing including sheltered housing with care support, staffed hostels, residential care homes, wheelchair accessible housing or housing that is easily adaptable for wheelchair use, and generally homes for older persons, children and other groups with particular specialist housing needs.
- 6.42 Given the nature of the uses and the projected increase in the need for specialist housing, proposals for specialist housing must demonstrate their long-term sustainability and financial viability.
- 6.43 The borough faces a demographic challenge in the coming decades, with a substantial rise forecast in its older population and whilst some of the housing needs of older people will in future continue to be met through the provision of general needs accommodation (e.g. mainstream housing, bungalows, step free apartments), there will be an increasing need for specialist accommodation types to cater for this demographic change.

- 6.44 The existing supply and pipeline of specialist accommodation will also be taken into account to ensure that there is not an over provision of an accommodation type.

### Key supporting documents

- Housing and Economic Development Needs Assessment (2022)
- Dementia and Town Planning, RTPi (2017)

### Which existing policy / policies does this supersede?

- Development Management Policies Document - Policy DM 21 Meeting Local Housing Needs

### Monitoring the Policy

- 6.45 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Number of planning decisions including appeals allowing specialist accommodation	Planning decisions and appeals
Number of specialist dwellings lost	Monitoring data
Number of additional specialist dwellings and bedrooms	Monitoring data

## Policy DM2: Loss of Housing

### Why we need the policy

- 6.46 Limited housing land within the borough means it is important that the existing housing stock is protected. The incremental loss of housing would undermine the provision of new housing to meet the borough's needs. Whilst any loss is important, it is recognised that there may be exceptional circumstances where it may be justified, in these circumstances the loss should be weighed against other planning benefits.

### Policy DM2: Loss of Housing

- 1) The loss of housing will only be permitted where the housing is replaced at existing or higher densities of a better standard; or where the following circumstances apply:
- a) The existing housing located on the site is of poor quality and un-economic to refurbish and the proposal would deliver quality housing whilst minimising the net loss of dwellings;
  - b) The proposal would result in alternative types of residential provision, that meet an identified need in the borough;
  - c) The proposal would provide for a social/community facility where there is a demonstrable need and the facility cannot be provided elsewhere;
  - d) The loss of affordable housing will be re-provided for onsite or at an alternative location within the borough.

### Implementing the policy

- 6.47 Residential floorspace including dwellings (Use Class C3), residential institutions (Use Class C2), and Houses in Multiple Occupation (Use Class C4) will be retained where possible. The policy sets out where there are exceptional circumstances that might justify their loss.
- 6.48 Housing that has fallen into disrepair and where its loss could be justified as resulting in an improvement to the existing will be supported, provided it also complies with other Local Plan policies.
- 6.49 The loss of Use Class C3 dwellings to alternative residential types will generally be supported provided the new provision meets the identified needs of the borough. The applicant will need to demonstrate there is a need for the use and the proposal does not result in a disproportionate provision of certain types of housing.
- 6.50 The council will consider permitting the loss of residential accommodation to a social or community facility as this is important social infrastructure that supports the health and wellbeing of the borough's residents and visitors.
- 6.51 Redevelopment of affordable housing will only be permitted where it is replaced by better quality accommodation, providing at least an equivalent floorspace of

affordable housing, either on site or in an alternative location within the borough. If the affordable housing is to be provided elsewhere within the borough, this will need to be secured before its loss takes place.

### Key supporting documents

- Housing and Economic Development Needs Assessment (2022)

### Which existing policy / policies does this supersede?

- New Policy

### Monitoring the Policy

- 6.52 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Gains/losses of C3 dwelling-houses/C2 and C4	Planning decisions and appeals

## Policy S9: Gypsies, Travellers and Travelling Showpeople

### Why we need the policy

- 6.53 The borough has an established Gypsy and Traveller population and their accommodation needs will change over the plan period with the Gypsy and Traveller Accommodation Assessment (GTAA) identifying the need for an additional 18 gypsy and traveller pitches over the Plan Period. The council has a legal responsibility to develop a fair and effective strategy to address these needs and the council has allocated a minimum of 10 pitches to be provided as part of the Horton Farm Allocation (Policy SA6).
- 6.54 Some of the provision of Gypsy and Traveller accommodation is likely to be made through planning permissions being granted on appropriate unallocated land, particularly where households wish to meet direct family need within existing sites or family circumstances change and new households are formed requiring new sites. In addition, the provision of transit accommodation on well-travelled routes across Surrey, can help reduced incidences of unauthorised encampments. This policy therefore sets the criteria that will be used to determine applications on unallocated land.
- 6.55 This Policy also safeguards land authorised for permanent Gypsy, Traveller and Travelling Showpeople accommodation to ensure sufficient provision is maintained.



## **Policy S9: Gypsies, Travellers and travelling Showpeople**

### **Safeguarding Existing Supply**

1. Land authorised for permanent gypsy, traveller and travelling showpeople accommodation will be safeguarded from alternative development. Proposals which involve a change of use of the land or a loss of pitches or plots will not be permitted unless it can be evidenced that they are no longer required or new suitable equivalent provision is made.

### **Planning Applications**

2. Development proposals for Gypsy and Traveller and Travelling Showpeople accommodation (as defined in 'Planning policy for traveller sites' (2015) or any subsequent policy) and ancillary buildings, will be permitted where:
  - a) the use of the land is of a scale which respects, the settled community;
  - b) the site is capable of being provided with necessary on-site services;
  - c) the site is conveniently located for access to schools, medical services and other community facilities;
  - d) the site has a safe vehicular and pedestrian access from the public highway and adequate provision for parking; turning and safe manoeuvring of vehicles within the site;
  - e) the site provides adequate space for storage, play and residential amenity;
  - f) the site is not enclosed with hard landscaping, high walls or fences, to an extent that suggests deliberate isolation from the community;
  - g) the use of the land will not result in an unacceptable adverse impact upon local amenity, the existing character of the area and the natural and historic environment; and
  - h) ancillary buildings are of an appropriate scale and size.
3. Proposals for mixed residential and business activities will be assessed on a site-specific basis, taking the above criteria into account.
4. Proposals for transit Gypsy and Traveller accommodation will be permitted where the proposal:
  - i) complies with the above criteria (except for c);
  - j) can demonstrate it is located on an established travelling route;
  - k) provides accommodation available to all members of the Gypsy and Traveller community (i.e. it is not restricted to one family, group of friends or association).
5. Any permission granted for a Gypsy and Traveller and Travelling Showpeople site will be subject to a condition limiting occupation to Gypsies and Travellers and Travelling Showpeople, as appropriate.

**Implementing the policy**Safeguarding

- 6.56 The council, in partnership with Surrey County Council, currently manages two gypsy sites within the borough. Together these two sites provide a total of 30 public pitches. It is important to protect existing Gypsy, Traveller and travelling showman sites from being developed for alternative uses whilst there is a need for such sites, as currently demonstrated by the GTAA. It is also important to safeguard these sites for future generations of Gypsies and Travellers.
- 6.57 This policy therefore sets out that all land which has planning permission or lawful use for gypsy and traveller accommodation will be safeguarded to ensure that the permitted use is not lost through the grant of any subsequent planning permission to allow for other types of development or occupation by other communities.

Planning Applications

- 6.58 The council has incorporated a section within the policy to assesses any future proposals against for Gypsies, Travellers or Travelling Showpeople accommodation, which come forward during the plan period.
- 6.59 This section enables the council to deal with planning applications for Gypsy and Traveller accommodation on a site-by-site basis and would allow suitable sites to continue to be permitted, provided they meet the criteria set out in the policy. This section of the policy will ensure sites that may previously not have been identified have the opportunity to come forward in the plan period.
- 6.60 It is recognised that there are unlikely to be sites which would meet every one of these criteria. A 'best fit' approach will therefore be adopted.
- 6.61 New pitches and plots should have adequate utility services and amenity space, safe turning space and parking and be in areas with reasonable access to schools, health services and local services.
- 6.62 The impact of new traveller accommodation on existing communities and how well proposals can be integrated is an important consideration in the determination of applications for Gypsy and Traveller provision.
- 6.63 Ancillary buildings are often provided alongside mobile homes, providing facilities such as washrooms, laundry rooms etc. These must have a linked use to the main function of the land as traveller accommodation. They are not a requirement on site, and some traveller sites may not include them, with all facilities being provided within a static mobile home.
- 6.64 The council will consider proposals for the provision of ancillary buildings to meet the needs of Elderly and Disabled travellers.
- 6.65 Transit accommodation can help reduce unauthorised encampments and provide the police with greater powers to respond. If there is available accommodation on a transit site, the police can direct encampments to move there. Without available transit accommodation, the police are limited in what they can do. Careful consideration should be given to the location of a transit site to ensure it is on a well-established travelling route.

- 6.66 Provision of 'transit' accommodation for friends and family to visit existing gypsy, traveller and travelling showpeople sites should be dealt with using planning conditions specifying the number of days the site can be occupied by more than the allowed number of caravans (which permits visitors and allows attendance at family or community events).
- 6.67 In granting consent for a site, the council will include a condition to ensure that the sites remain in use by Gypsies and Travellers or Travelling Showpeople as appropriate, and the number of pitches and/or plots are retained to ensure a supply to need demand.

### Key supporting documents

- Gypsy and Traveller Accommodation Assessment (2022)
- Planning policy for traveller sites (2015)
- Equalities Act 2010
- Housing Act 2004

### Which existing policy / policies does this supersede?

- Development Management Policies Document - Policy DM23 Gypsy and Traveller Sites

### Monitoring the Policy

- 6.68 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Number pitches permitted via planning decisions including appeals	Planning decisions and appeals
Number of pitches lost via planning decisions including appeals	Planning decisions and appeals

## 7 Economy

### Policy S10 – Retail Hierarchy and Network

#### Why we need the policy

- 7.1 The council places great emphasis on promoting competitive and well managed town and local centres, in addition to local parades of shops which are essential to sustainable and thriving communities.
- 7.2 It is important to direct town centre uses to the Town and Local Centres in the first instance to maintain their vitality and viability.
- 7.3 The application of a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan is an important tool in achieving this aim.
- 7.4 Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

#### Policy S10: Retail Hierarchy and Network

To ensure the long-term vitality and viability of the Centres, the council will apply a 'town centre first' approach to proposals for retail, leisure and other main town centre uses. Development should be appropriate to the size and function of the centre within which it is to be located. The retail hierarchy includes the defined town and local centres. The wider retail network also includes other retailing locations across our area. The overall hierarchy and network is defined as follows:

**Town Centre:** Epsom Town Centre

**Local Centres:** Ewell Village and Stoneleigh Centre

**Neighbourhood Parades:**

Castle Parade, Ewell  
 Chessington Road / Green Lanes  
 Chessington Road / Plough Road  
 Chessington Road / Ruxley Lane  
 Gatley Avenue / Ruxley Lane  
 Horton Local centre  
 Kingston Road / Bradford Drive  
 Kingston Road / Ruxley Lane  
 Manor Green Road, Epsom  
 Poole Road, Epsom  
 Pound Lane, Epsom  
 Rosebery Parade, Kingston Road

Vale Road, Worcester Park  
Waterloo Road, Epsom

### Implementing the policy

- 7.5 Epsom has a designated town centre, which is shown on the Policies Map and is the largest retail centre in the borough. A strong town centre policy enables and encourages a full range of town centre uses to be implemented within them, but also allows the council to reject proposals that do not add to the vitality and viability of the town centre or which conflict with other policies and objectives. Such town centre uses include, retail, leisure, entertainment facilities, intensive sport and recreation uses, offices, arts, culture and tourism development. The council will support the provision of a diverse range of uses which appeal to a wide range of age and social groups. It is social and cultural experiences which provide critical reasons to visit our centres. Uses such as restaurants, places of worship, childcare settings, cafés and museums can complement the retail offer of a town.
- 7.6 A diversity of uses adds to a town centre, making it more attractive. However, concentrations of uses in the same locality, which do not ‘add value’, will be unacceptable.
- 7.7 Ewell Village and Stoneleigh are the borough’s local centres. They are the second tier of the hierarchy, being smaller in terms of their size, catchment and range of uses in comparison to Epsom town centre.
- 7.8 Neighbourhood parades are the third tier, serving a smaller catchment and helping to meet the day to day needs of the local communities they serve.

### Key supporting documents

- Retail and Commercial Leisure Needs Assessment (2020)
- Retail and Commercial Leisure Needs Assessment Update (2021)

### Which existing policy / policies does this supersede?

- Core Strategy - Policy CS14 Epsom Town Centre
- Core Strategy - Policy CS15 Role of Local Centres

### Monitoring the Policy

- 7.9 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Number of planning decisions including appeals allowing main town centre uses outside of the centres.	Planning decisions and appeals

## Policy DM3 – Primary Shopping Areas and Retail Frontages

### Why we need the policy

- 7.10 A Primary Shopping Area (PSA) is where the main retail development is concentrated and this policy, along with the designation of the PSA as shown on the policies map, identifies where the council considers that such retail uses should remain. Primary and Secondary Retail Frontages have also been identified within the PSA, which further support a core of retail uses to help reinforce the town centre's long-term vitality and viability.

### Policy DM3: Primary Shopping Areas and Retail Frontages

- 1) Within the Primary Shopping Area and Primary and Secondary Retail Frontages (as defined on the policies map) development proposals at ground floor level for Class E uses will be permitted if the following criteria are satisfied:
  - a) an active ground floor frontage is maintained that generates footfall; and
  - b) the proposal supports or enhances the vitality and viability of the Primary Shopping Area.
- 2) Within Primary Retail Frontages (as defined on the policies map), proposals at ground floor level should be for Class E use only.
- 3) Within Secondary Retail Frontages (as defined on the policies map), proposals for non-Class E uses, which involve drinking establishments will be considered on a case-by-case basis, to avoid an over proliferation of such uses.
- 4) Proposals for non-Class E uses at ground floor level, which are within the Primary Shopping Area but outside of the Primary and Secondary Retail Frontages, will only be favourably considered if they do not cause harm to the core retail function of the Primary Shopping Area and satisfy the criteria set out above for Class E uses.
- 5) Within the Primary Shopping Area and Primary and Secondary Retail Frontages the effective and efficient use of upper floors for main town centre uses or residential use is supported subject to having safe and convenient access and not inhibiting the functioning of the ground floor use.
- 6) Positive consideration will be given to pop up and other appropriate temporary uses within vacant units which can attract footfall to the centre.

**Implementing the policy**

- 7.11 The Primary Shopping Area (as defined on the policies map) will remain the focus for retail activity within Epsom Town Centre and Stoneleigh and Ewell Local Centres. Non-Class E uses will be considered subject to them not undermining the core retail function of the Primary Shopping Area. Class E uses are particularly encouraged within the defined Primary and Secondary Shopping Frontages to help reinforce the retail core and increase footfall. A greater degree of flexibility is provided to upper floor uses with residential or other town centre uses, which contribute towards the town centre's vitality and viability being supported.

**Key supporting documents**

- Retail and Commercial Leisure Needs Assessment (2020)
- Retail and Commercial Leisure Needs Assessment Update (2021)
- Housing and Economic Needs Assessment (2022)

**Which existing policy / policies does this supersede?**

- Core Strategy - Policy CS12
- Plan E – Epsom Town Centre Area Action Plan – Policy E4 - Town Centre Primary Shopping Area and Primary & Secondary Retail Frontages

**Monitoring the Policy**

- 7.12 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Planning permissions approved in the town centre for appropriate town centre uses (as defined in the NPPF).	Planning decisions and appeals

**Policy DM4: Edge of Centre or Out of Centre Proposals****Why we need the policy**

- 7.13 Town and Local Centres are important in meeting the retail and leisure needs of the residents who wish to shop and socialise locally or who are dependent on the facilities that they offer. The retail and leisure services offered play an important role in meeting local day-to-day needs particularly for those groups without access to a private motor vehicle, the elderly and other vulnerable groups.
- 7.14 The purpose of the policy is to protect the viability and vitality of Town and Local Centres by ensuring that they are not undermined by competing uses being located elsewhere.



- 7.15 The requirement for sequential tests and impact assessments will help to protect the trading performance, and overall vitality and viability of the borough's designated centres from adverse impacts of new retail and leisure developments in less suitable locations.

### **Policy DM4 – Edge of Centre or Out of Centre Proposals**

#### Sequential Test

1) Planning permission for main town centre uses outside the identified centres and which are not on sites allocated for such uses, will be permitted where the applicant has successfully demonstrated that there are no other more suitably located and available sites nearer to the identified centres for the town centre use(s) proposed, using a sequential approach to site identification.

#### Retail Impact Assessment

2) Proposals for retail and leisure development over 500sqm gross floorspace which are not within a designated centre and which are not on sites that are allocated for such uses must be accompanied by an impact assessment and will only be permitted if it is demonstrated that it will not cause a significant adverse impact on existing centres.

3) Development that fails the sequential approach to development or is likely to have significant adverse impacts will be refused.

### **Implementing the policy**

- 7.16 The Town and Local Centres are defined on the policies map. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.
- 7.17 The council will positively focus new development in the Town and Local centres. Any development will be expected to be of an appropriate scale and design for the particular centre. Proposals outside these areas will be assessed according to the sequential test, the requirement for good accessibility by walking, cycling and public transport, and their impact on committed and planned public and private investment.

#### Sequential Test

- 7.18 The NPPF requires main town centre uses to be located in Designated Centres, then in an edge of centre location and only if suitable sites are not available should an out of centre site be considered. The sequential test should be applied to applications for all retail or other main town centre uses that are located outside of the Designated Centres and that are not located on other sites allocated for such uses. The sequential test need not be applied to proposals for retail or main town centre uses located on sites within designated neighbourhood parades, as it is considered such uses are appropriate within these designated areas.

- 7.19 The sequential test should look borough wide and will be applied to development proposals for retail and other main town centre uses, in order of locational preference:
1. Sites located within Epsom Town Centre and Local Centres or other designations allocated for such uses;
  2. Sites located within edge of centre locations as defined in Annex 2 of the NPPF;
  3. Other sites that are accessible by a range of sustainable transport options, including public transport, cycle, on foot, and by people with disabilities.
- 7.20 When considering edge of centre and out of centre proposals, the council will give preference to accessible sites which are well connected to the town centre. The council will expect applicants to demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.

#### Impact Assessment

- 7.21 Applications for retail and leisure proposals that are outside Epsom Town Centre and are not on sites that are allocated for such uses must be accompanied by an impact assessment where they exceed 500 sqm gross as set out in this policy.
- 7.22 Testing the impact of development will focus on the impact of the development on in-centre investment and vitality and viability (including trading impact).
- 7.23 In the case of existing retail warehouses that are effectively limited to bulky goods, the council will resist pressures to broaden out the range of goods permitted to be sold. This is to protect the vitality and viability of the Town and Local Centres, but it would also help retain the availability of units for bulky goods sales. If proposals come before the council for relaxing the restrictions on the range of goods to be sold, then they should meet the requirements of this policy.

#### **Key supporting documents**

- Retail and Commercial Leisure Needs Assessment (2020)
- Retail and Commercial Leisure Needs Assessment Update (2021)

#### **Which existing policy / policies does this supersede?**

- 7.24 Development Management Policies Document (2015) - DM29 Major new retail developments

#### **Monitoring the Policy**

- 7.25 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Number of planning decisions including appeals allowing main town centre uses outside of the centres.	Planning decisions and appeals

## Policy DM5: Neighbourhood Parades and Isolated Shops

### Why we need the policy

- 7.26 In addition to Epsom town centre and the local centres at Ewell and Stoneleigh, the borough is served by a number of smaller neighbourhood parades and isolated shops, which help to support sustainable communities through providing services and facilities that cater for the day to day needs of our residents. This policy aims to protect and reinforce their role.

### Policy DM5: Neighbourhood Parades and Isolated Shops

- 1) Within the neighbourhood parades, development proposals will be permitted providing they satisfy all of the following criteria:
  - a) they are appropriate to the scale and function of the parade
  - b) they maintain or enhance the vitality and viability of the parade
  - c) if at ground floor level:
    - i. they provide an active frontage, such as a shop front or window display, which is in keeping with the character of the centre/parade
    - ii. they would contribute to range of retail service and community uses which provide for the day to day needs of local people.
- 2) Residential development at first floor level or above will be supported, subject to having safe and convenient access and not inhibiting the functioning of the ground floor use.
- 3) The loss of main town centre uses at ground floor to other uses, including the loss of retail units within Class F2(a), will only be permitted where it can be demonstrated that the existing use is no longer viable. Such proposals must meet the above criteria and be supported by evidence that demonstrates active and appropriate marketing for a period of at least 12 months.
- 4) Proposals to change the use of isolated shops within Class F2(a) will only be permitted where the unit has been vacant and there is evidence to demonstrate active and appropriate marketing for a period of at least 12 months

### Implementing the policy

- 7.27 The boundaries of the neighbourhood parades are shown on the Policies Map.
- 7.28 Isolated shops are defined as those not within a town centre, local centre or neighbourhood parade.

- 7.29 Proposals which enhance the retail function/provide community uses which help to meet the local community's day to day needs will generally be supported, subject to them being consistent with other Local Plan policies.
- 7.30 Marketing periods of no less than 12 months will be required when seeking to demonstrate that the existing use is no longer viable. Further detail on marketing requirements is contained in Appendix 4.

### **Key supporting documents**

- Retail and Commercial Leisure Needs Assessment (2020)
- Retail and Commercial Leisure Needs Assessment Update (2021)

### **Which existing policy / policies does this supersede?**

- Development Management Policies Document (2015) - DM31: Safeguarding Small-Scale Retail Provision

### **Monitoring the Policy**

- 7.31 The following indicators and data sources will be used to monitor the effectiveness of the policy:

<b>Indicator</b>	<b>Data source(s)</b>
Number of planning decisions including appeals allowing appropriate uses within the neighbourhood parade.	Planning decisions and appeals

## Policy S11: Economic Development

### Why we need the policy

- 7.32 The designation of strategic employment sites will ensure the Local Plan supports the continued development of a strong and diverse local economy where businesses can invest, expand and adapt.
- 7.33 The borough has a diverse economy. Kiln Lane and Longmead Industrial Estates are our two largest employment sites, providing approximately 55ha of employment land between them. Although the majority of uses at the site are industrial, warehousing & storage and distribution, they also accommodate office uses. In addition, there are non-traditional employment uses established at the site that fall within the Sui Generis use class, including vehicle sales and repairs, builders' merchants and trade counter businesses.
- 7.34 The two sites provide accommodation for 130 businesses, including some regionally significant businesses. The vast majority of which are classed as Small and Medium Enterprises. The business at the two sites provide employment within a diverse range of sectors generating direct employment (estimated to be in excess of 1,900 jobs) but also indirect employment in the local area.
- 7.35 The borough's other employment sites make a valuable contribution towards supporting economic growth. There are a wide range of these employment sites dispersed within the borough's urban area, with concentrations of office accommodation in Epsom Town Centre and office provision in the Local Centres.
- 7.36 The Housing and Economic Development Needs Assessment (HEDNA) recommends that the council should continue to secure the warehousing and general industrial floorspace supply in key industrial estates of the borough. Also, ensuring the appropriate type (e.g., serviced offices) and sizes (e.g., smaller size band with less than 1,000sqm) of office floorspace is provided in the market. This is to meet future needs for employment floorspace over the Local Plan Period.
- 7.37 To help support a prosperous economy, the policy provides the highest degree of protection to the strategic employment sites and actively encourages the redevelopment and regeneration of the sites as the opportunity arises to support economic growth and provides a criteria-based policy for assessing proposals that would result in the loss of other employment floorspace located outside of the defined Strategic Employment Sites.

### Policy S11: Economic Development

#### Strategic Employment Sites

1) To contribute towards meeting the future economic growth needs of the borough, Kiln Lane Industrial Estate, Longmead Industrial Estate (as defined on the Policies Map) are designated as Strategic Employment Sites, to be afforded the highest protection and safeguarding for Employment Generating Uses.

2) The redevelopment and regeneration of these sites will be supported to provide floorspace for Employment Generating Uses that meets the needs of the market.

3) At the Kiln Lane Strategic Employment Site (as defined on the policies map), mixed use proposals that result in no net loss of employment floorspace will be supported where the proposal is in conformity with a comprehensive masterplan for the site that has been approved by the council.

#### Other employment sites

4) The loss of floorspace occupied by employment-generating uses will be permitted where it is demonstrated that:

- a) There are no strong economic reasons to retain the Employment Use;
- b) There is no reasonable prospect of the site being retained in employment use; and
- c) The site is no longer suitable for its existing use or other employment uses;

#### Creative and Cultural Industries

- 5) The council will protect existing cultural venues, facilities and uses where appropriate and support the development of new cultural venues in Epsom town centre
- 6) The council will permit proposals that develop and enhance creative workspace, that are suitable, attractive and affordable for the creative industries.

### **Implementing the policy**

- 7.38 For the purposes of this Policy Employment generating uses are those that fall within Classes B2, B8 and E (g) of the Use Classes order and Sui Generis uses that do not fall within the aforementioned use classes but have similar accommodation and location requirements (e.g. trade counters).
- 7.39 The council will support the regeneration and intensification of Employment Uses at the Strategic Employment Sites to allow businesses to expand and enable the provision of modern employment stock to replace properties that have reached, or are reaching, the end of their functional economic life or that no longer meet market needs.
- 7.40 The council recognises that there is opportunity to intensify employment uses on the strategic employment sites, for example through the redevelopment of units that have reached the end of their functional economic life with modern flexible accommodation that better meets the needs of the market. The council will seek to focus industrial, light industrial and warehousing uses at the Longmead Industrial Estate.
- 7.41 At Kiln Lane the council could support the comprehensive redevelopment of the site for mixed use development where there is no net loss of employment floorspace as a result of the proposals. The council will not support the piecemeal redevelopment of parcels of land within the strategic site. To deliver the council's place making aspirations a comprehensive masterplan will need to be prepared to guide future development at the entirety of this strategic site. In addition, any businesses that would be displaced by the proposals must be provided with alternative

accommodation either within the site where compatible with the mix of uses proposed or at the adjoining Longmead Industrial Estate.

7.42 For employment sites not designated as Strategic Employment Sites:

Demonstrating that There Are No Strong Economic Reasons

- a) Whether the proposals would harm the businesses currently established at the site (for example, by requiring them to relocate prior to the termination of their lease when no suitable alternative accommodation is available in the local area, and it can be demonstrated that the relocation of the business would impact upon its operation and sustainability);
- b) If the site is occupied, information on the number of businesses occupying the site/premises, the remaining lease length for each of the occupiers, and evidence that suitable alternative accommodation is available to accommodate their needs in the local area;
- c) Whether the site is suitable for contributing towards meeting the needs for employment land, as identified in the most recent HEDNA; and
- d) Whether the proposal would undermine the operation of a wider employment area by negatively impacting upon established neighbouring uses.

No reasonable prospect

- 7.43 Developers will need to demonstrate that they have actively marketed the site for at least 12 months when seeking to demonstrate that there is no reasonable prospect of the site being retained in employment use(s). The required marketing period will depend on the location, use and quality of the unit. Further detail on marketing requirements is contained in Appendix 4.
- 7.44 The council will support established cultural venues and facilities in the borough which are an important component of the borough's economy, and additional provision of new cultural venues will be supported with Epsom Town Centre.
- 7.45 The creative industries are important to the borough and the council wants to unleash the potential of the creative industries by encouraging students to establish businesses in the borough. The council will consider the use of vacant commercial properties and land for pop-ups or meanwhile uses for cultural and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in Epsom Town Centre.

**Key supporting documents**

- Housing and Economic Development Needs Assessment (2022)
- Longmead and Kiln Lane Industrial Estates Economic Value Report (2022)

**Which existing policy / policies does this supersede?**

- Core Strategy (2009) - Policy CS11 Employment Provision
- Development Management Policies Document (2015) - Policy DM 25 Development of Employment Premises



**Monitoring the Policy**

- 7.46 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Loss of Floorspace in economic use at the Strategic Employment Sites	Planning decisions and appeals
Loss of Floorspace in economic use outside of the Strategic Employment Sites	Planning decisions and appeals

## Policy DM6: Equestrian and Horse Racing Facilities

**Why we need the policy**

- 7.47 Horse riding is a popular recreational and sporting activity that makes a valuable contribution towards the borough's economy. There are concentrations of equestrian uses outside of the urban area including Epsom Downs Racecourse and its associated training grounds and stable complexes.

Policy DM6: Equestrian and Horse Racing Facilities
<p>1) Planning permission will be granted for new equestrian development or extensions to existing facilities where:</p> <ul style="list-style-type: none"> <li>a) The design, scale and siting of the proposed development is consistent with policies for development associated with outdoor sport and recreation in the Green Belt;</li> <li>b) Sufficient land is available for grazing and exercise;</li> <li>c) The facility is close to an existing bridleway and open space network which is capable of supporting the equestrian use and the riding of horses off-site would not cause inconvenience or danger to horse riders, pedestrians or drivers; and</li> <li>d) The proposed development makes use of existing buildings where practicable.</li> </ul> <p>2) Planning permission will be granted for new equestrian development or extensions to existing facilities, for private domestic use, where: the above criteria are met; and any built development is located within, or well-related to, the residential property which the proposed development is intended to serve.</p> <p>3) Within the Racehorse Training Zone, identified on the Policies Map:</p> <ul style="list-style-type: none"> <li>a) Any proposals resulting in the loss of specific facilities which would support the long term or future use of the site as a racing stable will be resisted;</li> </ul>

- b) The change of use or redevelopment of existing racehorse training or other equestrian sites will not be permitted unless evidence has been provided that:
- i. Marketing as a racehorse training or equestrian site has taken place in line with Appendix 4, at a reasonable market value with a recognised agent; and,
  - ii. Opportunities to reconfigure and reuse the site so that it can revert to racehorse training or equestrian use in the future have been exhausted.

### Implementing the policy

- 7.48 Epsom Downs is a nationally renowned sporting venue; home of the Epsom Derby and a major centre for sporting and cultural events. Adjacent to the racecourse itself, the training grounds are a national centre for the training of racehorses, which make a positive contribution to the economy and sporting heritage of the area.
- 7.49 The loss of equestrian facilities within the Racehorse Training Zone as identified on the Policies Map is potentially harmful to the ongoing viability of Epsom Downs as a racehorse training centre, which could in turn undermine its contribution to the economy and sporting heritage of the area and long-term management of its attractive open landscape. With this in mind, the council will support ongoing availability of suitable equestrian facilities that are capable of supporting racehorse training at Epsom Downs. That is unless there is clear evidence that there is no realistic prospect of racehorse breeding and/or training continuing or becoming re-established at the site.
- 7.50 The popularity of horse-riding leads to demand for a wide variety of development, from small-scale private domestic stable yards to larger-scale commercial premises such as livery stables, riding schools and racing stables. There can also be demand for a range of associated facilities such as sand schools and external lighting.
- 7.51 This leads to built development in Epsom and Ewell's countryside which is designated as Green Belt. A balanced approach is required to ensure that the borough's equestrian and related businesses are able to flourish, while also managing potential impacts on the intrinsic character and appearance of the countryside. Particular attention will be paid to the siting, design and materials of new equestrian development (including lighting) in line with relevant policies for the protection of heritage and valued landscapes.
- 7.52 New buildings to provide large-scale indoor facilities may conflict with policies for protection of the Green Belt, where the focus is on supporting outdoor sport and recreation.
- 7.53 Sufficient land should be available to avoid overgrazing, which can detract from the appearance of the countryside. When considering whether proposed buildings and/or grazing land appear to provide an appropriate environment to support a well managed equestrian use, the council will have regard to the DEFRA Code of Practice for the Welfare of Horses, Ponies, Donkeys and Their Hybrids, December 2017, or equivalent subsequent guidance.
- 7.54 <https://www.gov.uk/guidance/keeping-horses-on-farms> and British Horse Society's 'Guide for the Keeping of Horses' (GKH) provide useful information about welfare including site size. Some councils (eg the former Aylesbury Vale Local Plan)

specifically ask for information on land – asking for 0.5 to 1 ha per horse. As a result of equestrian use, some bridleways and commons can become overused, spoiling their enjoyment for others. In areas where there is evidence that the right of way network is under particular stress at the time of the application, the council will have regard to the wider implications of development proposals that would increase the level of horse riding on local bridleways. Where development appears likely to generate highway safety concerns, the advice of the Highways Authority and/or Surrey County Council Rights of Way team will be sought as required.

### Key supporting documents

- Housing and Economic Development Needs Assessment (2022)

### Which existing policy / policies does this supersede?

- Development Management Policies Document (2015) – Policy DM26: Equestrian-Related Development in the Green Belt

### Monitoring the Policy

- 7.55 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Loss of land to non-equestrian uses in the defined Racecourse Training Zone	Planning decisions and appeals

## Policy DM7: Visitor Accommodation

### Why we need the policy

- 7.56 The visitor economy is important to support jobs and the economy in the borough; therefore, it will be important for Epsom and Ewell to maintain its appeal to visitors. Whilst the boroughs attractions tend to generate day-trip visitors, there is a modest demand for additional hotel accommodation within the borough as identified in the Surrey Hotel Future Study.

### Policy DM7: Visitor Accommodation

- 1) Planning permission will only be granted for the development of visitor accommodation in the following locations: in Epsom Town Centre, in Local Centres, on sites allocated for that purpose, and on Epsom's principal movement corridors where there is frequent and direct public transport to the town centre. This locational requirement does not apply to proposals to refurbish or expand existing sites.

- 2) Proposals for new, refurbished or expanded holiday and other short-stay accommodation must meet all the following criteria:
- a. they are acceptable in terms of access, parking, highway safety, traffic generation, pedestrian and cycle movements;
  - b. there is no loss of residential dwellings; and
  - c. they will not result in an unacceptable level of noise and disturbance to nearby residents.
- 3) Planning permission will only be granted for proposals that result in the loss of visitor accommodation and other short stay accommodation when any of the following criteria are met:
- d. no other occupier can be found following a realistic effort to market the premises as set out in Appendix 4, for continued use as visitor accommodation (whether or not of the same form of the existing use); or
  - e. evidence of non-viability is submitted; or
  - f. the accommodation is in a location unsuitable for the use as demonstrated by being contrary to the location requirements or any of the criteria a-c above.

### Implementing the policy

- 7.57 The size of the borough means that it is unlikely that large sites suitable for new visitor accommodation will be regularly available, therefore the loss of existing visitor accommodation should be resisted.
- 7.58 Proposals for new visitor accommodation should be located within identified town or local centres or highly sustainable locations close to sustainable transport hubs/corridors with access to a good range of amenities. The loss of visitor accommodation that contributes to the economic vitality of the borough will be resisted.
- 7.59 The occupation of new tourist accommodation will be restricted using conditions or legal agreements to ensure tourist use and not permanent residential use.

### Key supporting documents

- Surrey Hotel Futures (2015)

### Which existing policy / policies does this supersede?

- Development Management Policies Document (2015) – Policy DM33 – Visitor Accommodation

### Monitoring the Policy

- 7.60 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Planning permissions or appeals granted for visitor	Planning decisions and appeals

accommodation (number of units and bedspaces)	
Planning permissions or appeals granted for the loss of visitor accommodation (number of units and bedspaces)	Planning decisions and appeals

## 8 Built and Natural environment

### Policy S12 - Design

#### Why we need the policy

- 8.1 High quality design is essential to realising this Local Plan's vision that the borough will retain its distinct identity and remain an attractive place to live, work and visit.
- 8.2 It is integral to sustainable development, placemaking, and developing buildings and spaces that work well for everyone, look good, last well and can adapt.
- 8.3 Good design helps to improve the way that a place looks and functions. The borough is already an attractive place to live, with a thriving town centre, accessible amenities, a rich variety of heritage assets, well preserved conservation areas, excellent open spaces and interesting buildings. However, new development could do more to enhance local distinctiveness and encourage healthy, active lifestyles.
- 8.4 In order to achieve the Local Plan's vision, new development will need to be inclusive and attractive to bring about living and working environments that people want to visit. A strategic design policy is needed to clarify what the council expects from new development to meet these design-related requirements.
- 8.5 This policy provides this clarification at a strategic level, but it is not the only policy that will inform the design of new development. Other strategic and development management policies contain relevant guidance that may affect how the proposed development is laid out, how it looks and how it should be used. This policy will form a starting point for understanding how the council will ensure that all new development helps to improve the local area and its sense of place.

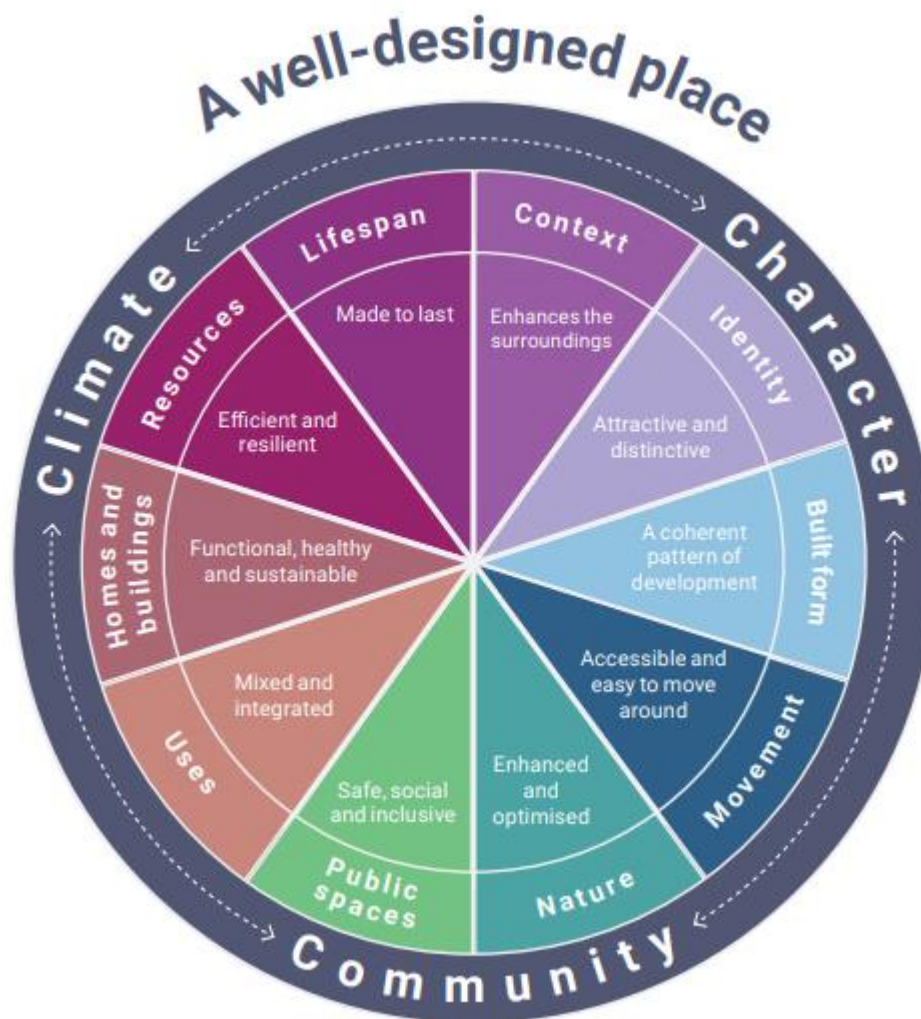
#### Policy S12: Design

- 1) The design of all development must:
  - a. Respect the scale, appearance and location of buildings, spaces and visual amenity of surrounding area or, in the case of areas subject to supplementary planning guidance, any clearly prescribed parameters for future development;
  - b. Accommodate well considered detailing to enhance its surrounds;
  - c. Make people feel safe, in accordance with "secured by design" principles;
  - d. Not compromise neighbours' amenity by appearing dominating, blocking outlook from windows, daylight, sunlight or overlooking;
  - e. Avoid light pollution;
  - f. Respect existing building lines and spacing between buildings;
  - h. Incorporate good quality materials;
  - i. Preserve and enhance soft landscaping; and
  - j. Maximise opportunities for integrating passive design principles, including orientation, glazing and shading with regard to the winter and summer sun and natural ventilation.

2) All non-residential development must achieve a minimum of BREEAM 'Excellent' UK New Construction standard or equivalent, or any equivalent new standard. This standard should be achieved through increasing the energy efficiency of the proposed buildings, and/or the provision of on-site renewable and low-carbon technologies.

### Implementing the policy

- 8.6 The council will attach great weight to the general policies and principles set out in the NPPF and the PPG; in the context of the "10 Characteristics" of good design set out in the National Design Guide when considering design-related matters in new development.



- 8.7 The council may produce development briefs and design codes that provide more prescriptive direction for particular areas and opportunity areas. For major development, applicants will be strongly advised to use appropriate methods of peer review, such as design review panels, where possible. Where required by planning legislation, the Design and Access Statement will be expected to include sufficient detail to justify the proposal.



**Key supporting documents**

- National Design Guide

**Which existing policy / policies does this supersede?**

- Core Strategy - Policy CS5: The Built Environment
- Development Management Policies Document – Policy DM10: Design Requirements for New Developments (including House Extensions)

**Monitoring the Policy**

- 8.8 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Planning permissions refused based on the policy	Planning decisions and appeals

## Policy S13: Protecting the Historic Environment

**Why we need the policy**

- 8.9 The borough has a rich and varied heritage that provides depth of character to the local environment. This is reflected by the 21 Conservation Areas, 436 Listed Buildings and 81 Locally Listed Buildings. Heritage assets are the valued elements of the historic environment and make an important contribution to the quality of the borough's architectural, historic and townscape character. To maintain the character of the borough, it is vital that heritage assets are protected and sensitively adapted and that their setting is not harmed. The historic environment is a finite resource and, once lost, cannot be replaced.

### Policy S13: Protecting the Historic Environment

1. Development proposals will be permitted which:

- a) preserve, conserve and, where possible, enhance the significance of designated and non-designated heritage assets and the contribution they make to local distinctiveness and sense of place; and
- b) make sensitive use of historic assets, especially those at risk, through regeneration and reuse, particularly where redundant or under-used buildings are brought into appropriate use.

**Heritage Statements**

2. A development that would affect, or has the potential to affect, a heritage asset must be accompanied by a Heritage Statement.

**Proposals likely to cause harm to a heritage asset**Substantial harm

3. Where development is likely to cause substantial harm (or total loss) to the significance of a heritage asset or its setting, planning permission will not be granted unless either:

- a) the development is necessary to achieve substantial public benefit, that cannot be achieved otherwise, and which would outweigh the harm or loss; or
- b) all of the following apply:
  - i. the nature of the heritage asset prevents all reasonable uses of the site; and,
  - ii. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and,
  - iii. the harm or loss is outweighed by the benefit of bringing the site back into use and,
  - iv. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation.

Less than substantial harm

4. Where a development is likely to cause less than substantial harm to the significance of a heritage asset or its setting, the following will apply:

- a) for a designated heritage asset, this harm should be weighed against the public benefits of the development, including whether these benefits could be secured in some other way without harm to the asset and securing its optimum viable use.
- b) for a non-designated heritage asset, a balanced judgement will be made having regard to the scale of any harm or loss and the significance of the heritage asset.

**Proposals for the removal of all or part of a heritage asset**

5. The removal of all or part of a heritage asset cannot proceed until it is proven that the approved replacement development will take place.

**Implementing the policy**

- 8.10 This strategic policy seeks to ensure that appropriate protection is afforded to heritage assets in the borough that are highly valued by residents.
- 8.11 Heritage Statements will need to describe the significance of the heritage asset and its setting, using appropriate expertise and where necessary a site-specific survey, at a level of detail proportionate to the significance of the heritage asset and sufficient to understand the potential impact of the development; and sets out:
  - the impacts of the development on the heritage asset;
  - measures taken to avoid potential harm; and

- if harm cannot be avoided, mitigation that is proportionate to the impact and the significance of the heritage asset. Any harm to, or loss of, the significance of a heritage asset will require clear and convincing justification, irrespective of whether that harm is considered substantial or less than substantial. Any identified necessary mitigation measures must be fully incorporated into the development.
- 8.12 The council will support the production of neighbourhood plans and conservation area appraisals, that help to ensure future development is based on a thorough understanding of local character and context. To help achieve this, the council will work with local communities to identify those aspects of the historic environment which they consider to be important to the character of their locality and help them to secure their protection and enhancement.
- 8.13 Design of new development in historic locations needs careful consideration. It should reinforce or create a sense of place and create an environment that offers variety and visual interest. High quality designs that respect the historic context will be encouraged.

### Key supporting documents

- National Heritage List for England
- Locally Listed Heritage Assets
- Conservation Area Appraisals

### Which existing policy / policies does this supersede?

- Core Strategy - Policy CS5: The Built Environment

### Monitoring the Policy

- 8.14 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Net gain/loss of listed buildings	Planning decisions and appeals
Number of listed buildings at risk	Buildings at risk register

## Policy DM8: Heritage Assets

### Why we need the policy

- 8.15 The rich historic environment in Epsom & Ewell includes over 500 statutory and locally listed buildings, 21 Conservation Areas, and historic Parks such as Nonsuch Park, the location of Henry VIII former Nonsuch Palace, which is a Scheduled Ancient Monument. The borough also has Sites of Archaeological Potential & Sites of Archaeological Importance which all make an important contribution to the

borough's heritage as well as its attractive environment, economic and social vitality.

- 8.16 Listed buildings have a special architectural or historic interest, and it is essential that they are well maintained, have an appropriate use and are kept in good repair.
- 8.17 Within the borough there are statutory listed buildings that make a valuable contribution towards local character and distinctiveness.
- 8.18 This policy addresses detailed issues that relate to Policy S13: Protecting the Historic Environment.

## **Policy DM8: Heritage Assets**

### **Conservation Areas.**

- 1) Development, in or adjoining a conservation area (as shown on the Policies Map), which would enhance its character, appearance, or setting will normally be permitted. Important features or characteristics, which contribute to its special character and setting, that need to be protected, include; plan form, buildings, architectural features, built form, archaeological sites, materials, trees, streets and spaces and the relationships between these features.
- 2) New development in a conservation area should aim to preserve or enhance the character, appearance and local distinctiveness of the historic environment and respect its surroundings in terms of height, massing, volume, scale, form, materials, details, roofscape, plot width and the design of any new pedestrian, cycle or vehicular access.
- 3) Development within, affecting the setting of, or views into and out of, a conservation area, as shown on the Policies Map, should preserve or enhance all features that contribute positively to the area's character, appearance or setting. Planning permission will be granted for development proposals which preserve or enhance:
  - a) existing architectural and historic character and associations by having regard to the positioning and grouping, form, scale, massing, detailing of development and the use of materials in its construction; and
  - b) areas of townscape quality; and
  - c) existing hard and soft landscaping features including areas of open space, trees, hedges, walls, fences, watercourses and surfacing and the special character created by them; and
  - d) the setting of the conservation area.
- 4) Proposals that would have a detrimental effect on such features will not be permitted. Built development will not be permitted on public and private open spaces within or adjacent to conservation areas where those spaces make a positive contribution to its character or setting, as identified in the conservation area appraisal, unless it can be demonstrated that the public benefit demonstrably outweighs the harm.

### **Listed Buildings**

- 5) Alterations and extensions to listed buildings and development affecting the setting of listed buildings, including locally listed buildings, should preserve and enhance their character and appearance and the special features for which they are designated. These features can include curtilage buildings, structures, spaces and the landscape setting that are integral to their character and important views within, of, into and out of the area or site.
- 6) Development that would have an adverse impact on their special historic or architectural interest, or their setting, will not normally be permitted.
- 7) The re-use of listed buildings, including locally listed buildings, will be encouraged where that use (the optimum viable use) is demonstrated to be compatible with the character, appearance, fabric, interior and setting of the building.
- 8) Listed buildings including those on a local list should be retained wherever possible. Substantial harm to or demolition of listed buildings, including curtilage listed buildings and locally listed buildings will only be permitted in exceptional circumstances. Where an application will lead to substantial harm or total loss of significance to the heritage asset, consent will be refused unless it can be demonstrated that:
  - a) the substantial or loss of significance is necessary to deliver substantial public benefits that outweigh the harm; or
  - b) the nature of the heritage asset prevents all reasonable uses of the site; and
  - c) no viable use can be found in the medium term; and
  - d) the harm to or loss of the asset is outweighed by the public benefits of bringing the site back into use; and
  - e) conservation through grant funding is not possible.
- 9) Applications for new works to listed buildings will be carefully assessed. Extensions will be required to be of an appropriate scale and design and in materials that retain the special interest of the original building. The character and significance of the building should not be diminished by over-restoration. Existing architectural or historic features including internal features should be retained as they are important to the character of the building.
- 10) Proposals will be permitted for external or internal alterations to a listed building and external alterations to a locally listed building, if the alterations:
  - a) are required or desirable; and
  - b) ensure that the building is fit for its purpose whilst having special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest, which it possesses.
- 11) Applications for alterations to, or, for changes of use of, listed and locally listed buildings must be accompanied by:
  - a) a detailed and accurate measured survey including full details of any structural timber framing. A scale drawing with large-scale details of joints will be required for timber-framed listed buildings.
  - b) detailed plans clearly explaining the principles of the conversion, showing how:
    - i. the alterations affect the external appearance of the building;
    - ii. the alterations affect the structure of the building. The detailed plans must show the effect that repairs and inserted floors would have on the existing structure. Any inserted structure should be reversible; and

iii. the proposed internal layout respects the original character of the building.

- c) details of the treatment of landscaping, open spaces and boundaries to respect the character of the building and its setting.
- d) an assessment of the impact of the proposed alterations on the historic or architectural significance of the building and its setting.

#### **Archaeological assets**

- 12) Development proposals will be granted planning permission which do not adversely affect nationally significant features of archaeological or historic importance or their setting.
- 13) Where a development has the potential to affect heritage assets with archaeological interest, the applicant will be required to submit an appropriate desk-based assessment and where necessary a field evaluation. The evaluation should define:
  - a) the character, importance and condition of any archaeological deposits or structures within the application site;
  - b) the likely impact of the proposed development on these features (including the limits to the depth to which groundworks can go on the site); and
  - c) the means of mitigating the effect of the proposed development including: a statement setting out the impact of the development.
- 14) Developers must incorporate the results of these studies into their proposals, so that important remains are preserved in situ (i.e. in their original position) through, for example, the careful siting of buildings and sensitive design of foundations. This approach will also apply to currently undiscovered sites and areas of interest which will emerge after the publication and adoption of this plan.
- 15) For scheduled monuments and non-designated heritage assets of archaeological interest that are demonstrably of equal significance to scheduled monuments, loss or substantial harm (through the removal of remains) should be wholly exceptional.

### **Implementing the policy**

#### **Conservation areas**

8.19 Heritage assets which contribute to the character and appearance of conservation areas should be retained. When planning permission for demolition of a heritage asset is applied for applicants should demonstrate that:

- the demolition is necessary to deliver substantial public benefits; or
- the nature of the heritage asset affected prevents all reasonable uses for the site; and
- no viable use for the asset can be found in the medium term that will enable conservation; and
- conservation through grant funding is not possible; and

- the harm or loss of the heritage asset is outweighed by the benefits of bringing the site back into use.
- 8.20 Applicants must provide evidence that other potential owners of the heritage asset have been sought via appropriate marketing and that reasonable efforts have been made to seek grants for the asset's conservation. Further detail on marketing requirements is contained in Appendix 4.
- 8.21 To avoid any unsightly gaps or vacant sites, the council will impose conditions on a planning permission that no demolition shall take place until planning permission has been granted and contracts let for the replacement development.
- 8.22 Particular consideration will be given to the following:
- the retention of buildings, groups of buildings, existing street patterns, historic building lines and ground surfaces;
  - retention of architectural details that contribute to the character or appearance of the area;
  - the impact of the proposal on the townscape, roofscape, skyline, landscape and the relative scale and importance of buildings in the area;
  - the need to protect trees and landscape;
  - the removal of unsightly and negative features; and
  - the need for the development.

#### Listed Buildings

- 8.23 The historic fabric of listed buildings, both internally and externally should be protected from unsympathetic change. The council will encourage and if necessary enforce the repair and restoration of listed buildings and will pursue all reasonable means to ensure that listed buildings and their settings are preserved or enhanced.
- 8.24 The foremost principle that should guide works to historic buildings is to retain the original structure and fabric as far as is possible. Each type of historic building has its own characteristics and significance, usually related to its original function, these should be respected when proposals for alterations or change of use are put forward. Applicants must submit a heritage statement describing the significance of the heritage asset affected and the contribution of its setting to that significance. The level of detail to be submitted should be proportionate to the importance of the asset and should be sufficient to explain the impact of the proposal on the significance of the asset. This information should be set out in the documents accompanying an application for planning permission or listed building consent and could be included within the heritage. Applications will not be validated if the impact of the proposal on the significance of the asset is not clear.
- 8.25 During alterations, earlier features are sometimes revealed such as, brickwork, fireplaces, early window/door openings. In some cases, the council may attach conditions to a listed building consent for the retention of certain features or for their proper recording.
- 8.26 The significance and importance of historic buildings can be seriously devalued by inappropriate neighbouring developments and uses. The council will protect the setting of a listed building when considering proposals either in its curtilage or on adjacent properties. Applicants will be expected to provide sufficient information

about the proposed development and its relationship to its setting as part of a heritage statement, and/or design and access statement.

- 8.27 When consent is given to alter a listed building, the council will, where appropriate, impose conditions to ensure appropriate standards of workmanship and that historic materials are retained or reinstated. The council will normally require any planning application for the change of use of a listed building to be accompanied by full details of any associated alterations so that the effect on the character of the building can be ascertained. A proposed change of use for a listed building may be acceptable if it offers the best way of retaining or refurbishing it.
- 8.28 There is a presumption in favour of preserving listed buildings and consent will not usually be given for their demolition. Poor condition is no justification for demolition and where a building is redundant, every effort must be made to find an optimum viable new use. The optimum viable use should be consistent with the character of the building and design interventions must have regard to the stated significance of the asset. This principle will also be applied to locally listed buildings.
- 8.29 Where historic buildings are converted to a new use, the essential historic character and structure should be retained. The general principles in conversion are to retain the historic structure and fabric and repair what exists rather than renew unnecessarily. The onus lies upon the applicant to prove, where necessary, that the building is structurally sound and is capable of being converted to the proposed use without the need for major structural works.
- 8.30 Where there is evidence of deliberate neglect or damage to a heritage asset in the hope of obtaining consent, the council will not take the resultant deteriorated state of the asset into account.
- 8.31 The council maintains a register of heritage assets at risk. The register contains information about each property and assesses its condition. The council monitors these buildings and negotiates with owners to bring buildings back into use and good repair. Where negotiations fail legal action can be taken to preserve the building. If the owner of a listed building fails to maintain it, the council may serve a Repairs Notice under Section 48 of the Planning (Listed Buildings and Conservation Areas) Act 1990, specifying those works necessary to ensure the building's preservation. If those works are not carried out within a specified period, council may serve a Compulsory Purchase Order on the building. If the building has been deliberately left to become derelict and that the underlying motive for the neglect was to facilitate demolition and redevelopment, the council may be able to purchase the building for minimum compensation.
- 8.32 If a listed building, or unlisted building in a conservation area, is left vacant and is not properly secured or repaired, the council can carry out emergency repairs after giving seven days' notice to the owner and can subsequently recover the costs under sections 54 and 55 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The council is always reluctant to take action through the courts, and relies on co-operation from building owners, but it will consider using these powers if it is necessary to ensure the long-term survival of any historic building in its area.

#### Archaeological assets

- 8.33 Archaeological assets comprise all material remains relating to the history of man's presence and includes:



- scheduled monuments, defined as sites of national importance that are protected under the Ancient Monuments and Archaeological Areas Act 1979;
  - archaeological remains defined as of national importance, which although meriting designation, are not scheduled;
  - other archaeological remains defined as of regional (county) or borough importance; and
  - archaeological and historic landscapes consisting of one or more sites in association.
- 8.34 Scheduled Monument Consent is required to carry out any works that may affect them (including repairs) and works, which would adversely affect their character and setting, are not permitted. Such operations may include the flooding, tipping on, or disturbance of the ground. It is an offence to carry out such operations without first giving notice, although there are some exemptions. Development that would adversely affect the site or setting of a scheduled monument or of an archaeological site that is of national importance, will not be permitted.
- 8.35 Advice on whether there is likely to be an archaeological site affected by a development proposal can be obtained by contacting the council or Surrey County Council's Historic Environment Team.
- 8.36 Developers will be required to submit an archaeological desk-based assessment and/or field evaluation report with applications for planning permission where known or potential archaeological remains are likely to be affected by the proposed development. These help to define the character, extent, depth and quality of such remains and thus indicate the weight which ought to be attached to their preservation. The council will require developers to incorporate the results of these studies into their proposals, so that important remains are preserved in situ (i.e. in their original position) through, for example, the careful siting of buildings and sensitive design of foundations.
- 8.37 If a developer is not prepared to provide the above information, the council will issue a direction seeking evaluation information under Regulation 4 of the Town and Country Planning (Applications) Regulations 1988 .
- 8.38 The emphasis should be on preserving archaeological sites in situ. If this is not appropriate or possible, then an archaeological investigation for the purposes of preservation by record will be required before the site is developed. This is likely to involve a full archaeological excavation and recording of the site, conservation of any finds and publication of the results.
- 8.39 Where the disturbance or destruction of some archaeological remains, normally those of lesser importance, is considered acceptable or unavoidable, appropriate recording works will be ensured through agreements and through attaching conditions to planning permissions and listed building consents. As well as site work, this will include the compilation of an indexed archive record and the submission of a report that may, where the quality of the remains merit it, involve the full popular and academic publication of the results and public display and interpretation.
- 8.40 It is important to note that many historic assets with archaeological interest do not have any form of statutory protection and are not currently designated but have an equivalent significance to that of a Scheduled Ancient Monument.

- 8.41 Environmental improvements and adaptation to climate change will be supported, but sensitive design and siting is required to prevent any undue harm to the historic asset.

### Key supporting documents

- National Heritage List for England
- Locally Listed Heritage Assets
- Conservation Area Appraisals

### Which existing policy / policies does this supersede?

- Development Management Policy Document – Policy DM8: Heritage Assets

### Monitoring the Policy

- 8.42 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Net gain/loss of listed buildings	Planning decisions and appeals
Number of listed buildings at risk	Buildings at risk register

## Policy DM9: Shopfronts and Signage

### Why we need the policy

- 8.43 Shopfronts form an essential part of the character and attractiveness of Epsom Town Centre and other shopping areas in the borough and contribute to the creation of vibrant streets and public spaces.
- 8.44 Outdoor advertisements and signs can impact on amenity and public safety, and therefore sometimes require advertisement consent. Well-designed signs and advertisements will integrate well with buildings and the character of an area as well as meeting the commercial need for the advertisement. However, obtrusive designs and unthoughtful siting of signs and advertisements can have a detrimental effect on visual amenity or on the character of an area, particularly in conservation areas.
- 8.45 The policy approach will ensure that new or changed shopfronts that require planning permission (or listed buildings consent) and adverts and signs that require advertisement consent are of a design, size and materials that complement that character of buildings they are on and the surrounding public realm. The policy will ensure visual pollution and clutters are avoided and will help to maintain the boroughs historic shopfronts.

## Policy DM9: Shopfronts and Signage

- 1) Planning permission will only be granted for new or changed shopfronts, and advertisement consent will only be granted for signage and other forms of advertisement where the design, positioning, materials, colour, proportion and illumination are not detrimental to assets with heritage significance or visual or residential amenity. All should be demonstrated, and the following criteria should be met:
  - a) the design responds to and positively contributes to the character and design of existing buildings and surroundings;
  - b) public safety would not be prejudiced;
  - c) visual pollution and clutter are avoided;
  - d) historic shop fronts are retained;
  - e) the proposal will result in an 'active street frontage'.

### Shopfronts affecting heritage assets

- 2) Shopfronts which are of architectural and/or historic interest must be retained. The council will expect a high standard of design in new and altered shopfronts, blinds and security measures. Where new shopfronts are proposed they should:
  - a) create a fascia and shop window which is in character with the building itself, the upper floors and the surrounding street scene;
  - b) be correctly proportioned and be designed in an architectural style appropriate for the building and its context;
  - c) not result in a needless loss of architectural features; nor introduce 'house styles' and materials which are out of character with the building and its surroundings.
- 3) Where a shopfront with historic significance and value survives there will be a presumption in favour of its retention. If a new shopfront will form part of a group of original historic shopfronts its design should complement their character and quality.
- 4) Proposals for external security shutters which are not sympathetic to the character of the building and townscape and would result in a blank and inactive frontage detrimental to the street scene will not be supported.

### Advertisements affecting heritage assets

- 5) In conservation areas and on, or affecting, listed buildings, advertisements will be kept to a minimum to maintain the character and appearance of conservation areas and to avoid harm to the fabric, character or setting of listed buildings. Their size, design, materials and colouring should not detract from the character and appearance of the area.
- 6) Where a building is listed, locally listed or has a special character, the planning authority will grant advertisement consent or listed building consent for painted timber fascia advertisements and traditional hanging signs.

- 7) Internally illuminated box signs and plastic blinds are inappropriate in an historic context. Where illumination of a sign in a conservation area is acceptable it should be achieved by halo or other illumination to individual letters.
- 8) Projecting signs of traditional design will be acceptable provided they are:
  - a) carefully positioned in relation to the elevation of the building;
  - b) hung from traditional brackets;
  - c) there is only one sign attached to the building; and
  - d) any illumination is external and/or unobtrusive.

### **Implementing the Policy**

- 8.46 The design of new shopfronts and other commercial signage should demonstrate respect for the architecture, features and character of the buildings within the area. Design should accord with the council's guidance for shopfronts: 'Shopfront Design Guide' or any future revisions to this document'. The council will resist the removal of shopfronts of architectural or historic interest.
- 8.47 Compromises may need to be made to 'corporate' designs in particularly sensitive areas to meet the requirements of the policy, for example internally illuminated box fascias and projecting signs will not be generally appropriate in conservation areas.

#### Advertisements and Hoardings

- 8.48 The council will exercise strict control over the number, design and siting of advertisements and hoardings to ensure the character and amenity of individual buildings and streets are not materially harmed, having regard to the interests of amenity and public safety (including highway safety) in exercising its powers under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

#### Shopfronts affecting heritage assets

- 8.49 Where older shopfronts still remain, or where shopfronts are distinctive and contribute towards the character of the building and the street scene, there is a presumption against their replacement. Both customers and retailers benefit if the environment of the street scene is enhanced by well-designed and maintained shopfronts. As well as the alteration or replacement of shopfronts, other ill-considered alterations might include the addition of canopies, security shutters and cash point machines.
- 8.50 Security features associated with shopfronts should generally be internal in order to avoid harming the appearance of the building.
- 8.51 Solid external roller shutters in conservation areas are not acceptable as they are unsightly and to the detriment of their surrounds.

#### Advertisements affecting heritage assets

- 8.52 Advertisements and shop signs can complement the character of an area if designed properly. It is entirely possible for on-premises signage to reflect the character or architecture of its surroundings without sacrificing any of its other primary

communication functions. Well-designed signs can be employed to create a sense of place and improve the attractiveness of an area. Shop and trade signs must be integrated into the design of the shop front or building as a whole and sympathetic in form, scale and materials.

- 8.53 In conservation areas the council will enforce its controls so that advertisements are kept to the minimum necessary to identify the building and its function. Advertisement consent will not be permitted for internally illuminated box fascia signs or obtrusive fixed 'Dutch' blinds or window/door canopies.
- 8.54 Window stickers, pavements signs and illuminated signs hung inside the window can be equally harmful to amenity and will be discouraged where possible. In the case of listed buildings, permission will not be given where the council considers there would be harm caused by advertisements, lighting, colour schemes and blinds or canopies.

### Key supporting documents

- Town and Country Planning (Control of Advertisements) (England) Regulations 2007

### Which existing policy / policies does this supersede?

- Development Management Policies Document – Policy DM14 -Shopfront Design
- Development Management Policies Document – Policy DM15 -Advertisements and Hoardings

### Monitoring the Policy

- 8.55 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Active shopfronts within town and local centres and shopping parades in the borough	Planning decisions and appeals

## Policy DM10: Landscape Character

### Why we need the policy

- 8.56 The borough is well served by high quality, attractive landscapes particularly to the southern part of the borough, with Epsom Downs, which overlooks Epsom and has views of the London skyline. The landscape to the south of the borough is designated as an Area of Great Landscape Value (AGLV) originally designated by the Town and Country Planning Act 1947 as an area of land in England that has a particular scenic value.
- 8.57 The north and central core are more urban in character but within these areas are natural open spaces such as Nonsuch Park and valuable open spaces including Epsom Common and Horton County Park.

- 8.58 These natural landscapes play an integral part to the borough's unique character and sense of place. In addition to their aesthetic value, they also have a cultural and economic value attracting visitors and serving residents of the borough, it is therefore important that new developments complement and enhance the local character and natural landscape. This is particularly important where proposals are located on the edge of built-up limits; open areas or open space; or in the vicinity of more sensitive areas, e.g., within or in the vicinity of heritage assets.

<b>Policy DM10 Landscape Character</b>	
1)	Development proposals should be sensitively designed to complement and enhance the surrounding landscape.
2)	Development proposals will be permitted where: <ol style="list-style-type: none"> <li>they conserve and enhance the landscape setting and there is no undue harm to the surrounding landscape character,</li> <li>they consider the relationship with the surrounding landscape character, including impact on landscape features, views, landform, landscape patterns and impact on biodiversity;</li> <li>the siting of buildings or structures are carefully considered to minimise the impact on the visual impact on the landscape character and</li> <li>there is no adverse impact on historic landscapes and heritage assets including, registered parks and gardens, ancient monuments, ancient woodlands and conservation areas.</li> </ol>
3)	New development that would result in an improved environment or amenity to the existing environmental quality will be considered favourably provided it accords with other policies in the Local Plan.
4)	For larger development proposals or where development proposals are likely to have an impact on the surrounding landscape, developers must submit a Landscape and Visual Impact Assessment (LVIA) to consider the visual impact of the proposal on the immediate and wider area.
5)	Proposals within the Area of Great Landscape Value will only be permitted where it would not cause undue harm to its distinctive character.

### **Implementing the policy**

- 8.59 The borough's landscape is varied, a mixture of urban areas and natural landscapes from vibrant retail and employment centres, residential neighbourhoods, farmland, open spaces and land. Surrey County Council prepared a Landscape Character Assessment 2015 and Epsom and Ewell Borough Council undertook a character study in 2008 which divides the borough's urban areas into a number of character areas. Development proposals should have regard to the studies in preparation of proposals.
- 8.60 The landscape to the south is designated as an Area of Great Landscape Value originally designated by the Town and Country Planning Act 1947 as an area of land

in England that has a particular scenic value. The typography of the borough rises to the South East, where there are special views from Epsom Downs. It is important that development proposals to the south conserve and enhance the natural beauty of this area.

- 8.61 Applicants must demonstrate that their proposals are appropriate in context of the surrounding character. For larger schemes or for proposals in more sensitive areas, e.g., close to heritage assets or on the edge of the built-up limits adjacent to open areas, the submission of visualisations or a full Landscape and Visual Impact Assessment (LVIA) consistent with the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment (GLVIA3) or subsequent update to demonstrate the potential impact on the proposal within the wider landscape and townscape. Early pre-application discussion is advised in particular for these types of proposals.

### Key supporting documents

- Environmental Character Study (2008)
- Surrey County Council Landscape Character Assessment (2015)
- Landscape Institute - Guidelines for Landscape and Visual Impact Assessment (GLVIA3)

### Which existing policy / policies does this supersede?

- Development Management Policies Document – Policy DM9: Townscape Character and Local Distinctiveness

### Monitoring the Policy

- 8.62 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Development within the defined Area of Great Landscape Value	Planning decisions and appeals

## Policy S14: Biodiversity

### Why we need the policy

- 8.63 Planning policies should contribute to and enhance the natural environment by minimising impacts on and providing net gains for biodiversity.
- 8.64 The borough contains nationally and locally designated sites important for their biodiversity value. Other sites, both individually and collectively, that are not designated can contribute towards protecting and enhancing the diversity of species locally.
- 8.65 The Surrey Nature Partnership has identified areas called Biodiversity Opportunity Areas (BOAs) based on broad habitat types with the aim of protecting and enhancing



the county's biodiversity on a landscape scale. The borough falls in to three Surrey BOAs; notably Thames Basin Lowlands (TBL04), North Downs (ND04) and River Biodiversity Opportunity Area (R01).

- 8.66 The council recognises the opportunities to encourage biodiversity that can be provided through the development of sites. These include providing, retaining and enhancing wildlife corridors and incorporating opportunities within construction methods, such as green roofs, and the provision of suitable appropriate native species in landscaping.

### **Policy S14: Biodiversity**

- 1) Development proposals will be permitted where they will not have an adverse impact on biodiversity or geodiversity. Where harm or loss cannot be avoided, mitigation will be required such that it can be robustly demonstrate that:
  - a) there will be no adverse effect on the integrity of international, national and local designated sites;
  - b) there will be no adverse impact on the conservation status of priority species;
  - c) there will be no loss or deterioration of a priority habitat type, and/or irreplaceable habitat;
  - d) there will be no adverse impact on the conservation objectives of Biodiversity Opportunity Areas; and
  - e) there will be no adverse effect on the integrity of linkages between designated sites and priority habitats.
- 2) The weight attributed to the protection of nature conservation interests will be commensurate to their status and significance, and any other designation applying to the site, habitat or species concerned. For proposals that affect nationally protected sites, very special circumstances would be required to robustly demonstrate that the benefits of the development proposal clearly outweigh the loss or harm and that appropriate compensation will be sought
- 3) Effective avoidance, mitigation and compensation will be secured through the imposition of planning conditions or planning obligations as appropriate, including monitoring for the effectiveness of these measures
- 4) Unless an exemption applies, development will be permitted provided that it can demonstrate the provision of a minimum 10% increase in biodiversity units when set against the baseline biodiversity value. This may include the creation, restoration, enhancement and subsequent maintenance of habitats and features.
- 5) Major development should calculate this through the most up-to-date version of the Biodiversity Metric (or its equivalent). For development of 9 dwellings or less, the latest small sites metric (or its equivalent) should be used to calculate net gain.
- 6) Biodiversity net gain should be delivered using the following hierarchy:
  - a) On site as part of the development

- b) Where on site delivery is not feasible then this should be provided on land adjacent to, or as close to the development site as possible;
- c) As a last resort, net gain should be secured on land within the borough boundary.

### Implementing the policy

- 8.67 The weight to be attributed to the protection of nature conservation interest will be commensurate to their significance. The council will apply a hierarchical approach to the conservation of designated sites within the borough as follows:
- 1. International Sites: Note there are no International Sites designated within the borough
  - 2. National Sites: Sites of Special Scientific Interest (SSSI) and National Nature Reserves.
  - 3. Irreplaceable Habitats: habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity, such as ancient woodland, ancient and veteran trees
  - 4. Local Sites: Sites of Nature Conservation Importance (SNCI) and Local Nature Reserves.
- 8.68 Development proposals (unless exempt) will be required to deliver a minimum net gain of 10% biodiversity units and will be expected to use the appropriate DEFRA Biodiversity Metric 3.1 (or as subsequently amended), to calculate and demonstrate net gains.
- 8.69 Biodiversity net gain should be additional to any habitat creation required to mitigate or compensate for impacts of new development and should be delivered even if there are no losses through development. Biodiversity net gain should not be applied to irreplaceable habitats.
- 8.70 In the first instance, net gain should be delivered on-site, adjacent or as close to as possible. Where this is demonstrated as not achievable, net gain will need to be delivered off site through an appropriate contribution.
- 8.71 The delivery of biodiversity enhancements as part of new development should be informed by an understanding of the local ecological network. The council will produce further supplementary guidance to support the implementation of the policy following the adoption of the Local Plan.

### Key supporting documents

- Environment Act (2021)
- Epsom and Ewell Biodiversity Action Plan (2020-2030)

### Which existing policy / policies does this supersede?

- Development Control Policies DPD – Policy DM4: Biodiversity and New Development

### Monitoring the Policy

- 8.72 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Percentage of major planning applications delivering at least 10% biodiversity net gain	Planning decisions and appeals

## Policy DM11: Trees, Woodlands and Hedgerows

### Why we need the policy

- 8.73 The council recognises the huge benefit trees and woodlands provide for people, nature and the climate. Trees and woodlands together with other key ‘green infrastructure’, such as hedgerows, chalk grassland, meadows, heathland and wetlands provide multiple benefits. Not only do trees help us commune with nature but they provide enormous benefits for health and wellbeing, biodiversity, air purification and carbon capture. Trees provide a significant environmental, aesthetic, cultural and economic benefit for our residents.
- 8.74 In addition to the trees in parks, fields, woodlands, residential gardens and along verges and roadsides, the borough also has areas of ancient woodland and trees protected by Tree Preservation Orders.
- 8.75 The councils emerging Tree Management Plan will provide further information on how the council will manage its current tree population and where appropriate, increase existing tree canopy and numbers of trees on land in the ownership of the council.

### Policy DM11: Trees, Woodlands and Hedgerows

1) Development proposals will be permitted where:

- a) they do not result in the loss of, or damage to, ancient trees, trees, woodlands and hedgerows that make or are capable of making a significant contribution to the character or amenities of an area, unless

the benefits would clearly outweigh the loss and replacement planting is provided.

- b) existing trees and their root systems are protected, prior to, during and after the construction period
- c) they make provision for new streets to be tree lined and new trees, which must be sited to allow sufficient space for them to grow to maturity, both above and below ground ensuring that trees will not:
  - i. disrupt underground and overhead utilities;
  - ii. obscure sightlines for infrastructure such as CCTV and drivers of larger vehicles;
  - iii. hinder pedestrian mobility as a result of heavy leaf-fall or exposed roots; and
- d) they incorporate a long-term management plan for planting schemes

### Implementing the policy

- 8.76 Development proposals that involve the loss of trees, hedgerows or other landscape features, must be accompanied by an assessment of the significance of the trees and the potential degree of harm and how this will be mitigated. Any trees lost must be replaced on site where it is feasible to do so.
- 8.77 Proposals for new development will need to include:
- the submission of a proportionate assessment outlining the tree asset importance and the impact of the proposal;
  - appropriate landscape plans, clearly showing the species and the position of existing trees and other landscape features including; the proposed retention, losses and additions; and
  - appropriate management plans.
- 8.78 Development proposals that would result in the loss or harm to a veteran tree; trees protected by Tree Preservation Order (TPO) or trees within Conservation Areas will not be permitted unless exceptional circumstances exist that would outweigh the loss or harm caused. Planting of native species will be preferred in these areas consistent with the advice of the council's conservation officer and/or tree officers.
- 8.79 Applicants must work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users. Where specific on or off-site planting proposals are negotiated as part of the overall enhancement of a particular development site, the replacement, protection and long-term maintenance of trees, shrubs and other natural features will be specified by condition.
- 8.80 Where the correct design process is not followed and trees are pre-emptively removed before progressing a planning application, the council will require substantive replacement tree planting of similar species to demonstrate compliance with this Policy to ensure development respects and enhances the visual amenity of the landscape.

- 8.81 Trees protected by Tree Preservation Orders need permission from the council before any works are carried out on them. When considering applications for the felling or surgery to trees protected by a Tree Preservation Order or trees in conservation areas, account will be taken of the health and stability of the trees, their public amenity value and overriding practical problems that may be caused by retaining them. Where felling is unavoidable, replacement native planting will be required unless there are exceptional circumstances. Unauthorised works to protected trees can result in prosecution.

### Key supporting documents

- Emerging Epsom and Ewell Tree Management Plan (2022)

### Which existing policy / policies does this supersede?

- Development Management Policy Document: Policy DM5 – Trees and Landscape

### Monitoring the Policy

- 8.82 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
New development proposals including landscape plans	Planning decisions and appeals

## Policy S15: Flood Risk and Sustainable Drainage

### Why we need the policy

- 8.83 Epsom and Ewell Borough Council, alongside its partner organisations, has an increasingly important role to play in protecting communities from flooding and mitigating flood risk. Projections indicate that climate change will result in more frequent, short duration, high intensity rainfall and more frequent periods of long duration rainfall. These changes are likely to result in a more frequent occurrence of all types of flooding.
- 8.84 The main areas expected to be at risk of flooding during and beyond the plan period are identified within the Epsom and Ewell Strategic Flood Risk Assessment (SFRA) and the Environment Agency's flood risk maps.
- 8.85 A relatively small proportion of the borough is susceptible to river flooding, with the extents of Flood Zones 2, 3a, and 3b being largely confined to the areas adjoining the Hogsmill River and its tributaries. However, the urbanised areas, steep topography and potential rainfall runoff from the Epsom Downs introduces a relatively

high susceptibility to surface water, groundwater and localised flooding in other parts of the borough.

### **Policy S15: Flood Risk and Sustainable Drainage**

- 1) In order to reduce the overall risk of flooding development will be permitted provided that:
  - a. it meets the sequential and exception test (where required) as outlined in Government guidance;
  - b. within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons;
  - c. it will be safe for its lifetime and taking account of the vulnerability of its users, without increasing flood risk elsewhere, and where possible, will reduce flood risk overall, demonstrated through a site-specific flood risk assessment;
  - d. it incorporates flood protection, flood resilient and resistant measures including safe access and escape routes where required and that any residual risk can be safely managed by emergency planning; and priority is given to the use of sustainable drainage systems (where appropriate); and
  - e. it will not increase off site flood risk either via increasing surface water run-off or through the displacement and obstruction of flood waters from any sources.
- 2) All development will be required to ensure that, as a minimum, there is no net increase in surface water run-off. Priority will be given to the use of sustainable drainage systems (SuDS) to manage surface water drainage unless it can be demonstrated that SuDS are not appropriate. Where SuDS cannot be implemented a justification must be provided along with proposed alternative sustainable approaches to surface water management. SuDS should seek to enhance water quality and biodiversity and arrangements should be put in place for their whole life management and maintenance.
- 3) Development must be located away from at risk from, susceptible to, or have a history of groundwater flooding. If this is not possible then the development must be designed to incorporate flood resistance and resilience measures.

### **Implementing the policy**

- 8.86 New developments should not increase the risk of flooding elsewhere and should be safe from flooding themselves.
- 8.87 Inappropriate development in areas at risk of flooding from any source should be avoided by directing development away from areas at highest risk. The Strategic Flood Risk Assessment (SFRA) (2018) provides the framework for applying the sequential and exception tests in the borough as set out in national policy and guidance.

- 8.88 The SFRA provides a robust evidence of flood risk in the borough from various sources. It identifies and maps the risk of all sources of flooding across the borough based on a range of data and takes account of predicted climate change impacts (where known); it is a useful source of information in undertaking site specific flood risk assessments.
- 8.89 The policy will be delivered through working in partnership with the Environment Agency, Local Lead Flood Authority (Surrey County Council), planning applicants and developers and delivered through the development and building control processes.
- 8.90 Sustainable Drainage Systems (SuDS) is a term used to describe the various approaches that can be used to manage surface water drainage in a way that mimics the natural environment. The management of rainfall (surface water) is considered an essential element of reducing future flood risk, specifically within the borough's Critical Drainage Areas. Advice regarding the requirements of sustainable drainage systems is available from the Lead Local Flood Authority.
- 8.91 The council may use a legal agreement or planning conditions to ensure that measures designed to manage flood risk are implemented prior to a development proceeding.

### Key supporting documents

- Strategic Flood Risk Assessment – Update – June 2018

### Which existing policy / policies does this supersede?

- Core Strategy Policy CS6 - Sustainability in New Developments
- Development Management Policies Document – Policy DM19: Development & Flood Risk

### Monitoring the Policy

- 8.92 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Number of planning permissions granted contrary to Environment Agency advice on flooding and water grounds.	Planning decisions and appeals
Number of developments completed with SuDS measures implemented.	Planning decisions and appeals



## Policy DM12: Pollution and Contamination

### Why we need the policy

- 8.93 The management of pollution is important in order to integrate development within the borough so that quality of life is retained and enhanced for residents and visitors. Well-designed development will consider the impact of development on the environment as well as the environments impact on the development.
- 8.94 Local environmental impacts arising from development proposals should not lead to detrimental effects on the health, safety and the amenity of existing and future occupiers on the development sites or the surrounding land. These potential impacts include, but are not limited to; noise, air, water, light and soil/land contamination. Mitigation of the impacts of pollution and contamination will be important to achieve sustainable development within the borough.
- 8.95 Ewell High Street is a local hotspot for nitrogen dioxide pollution arising from road transport and as a result the council declared an Air Quality Management Area (AQMA) for this location in 2007.
- 8.96 There are localised areas of contaminated land within the borough resulting from previous or current use of the land.

### Policy DM12: Pollution and Contamination

#### Pollution

- 1) Development will be permitted provided that:
  - a) It does not give rise to, or would be subject to, unacceptable levels of pollution<sup>1</sup>; and
  - b) it is satisfactorily demonstrated through an assessment that any adverse impacts of pollution<sup>2</sup> will be adequately mitigated or otherwise minimised to an acceptable level<sup>3</sup>.

#### Soil Waste/Contaminated Land

- 2) Development proposals on potentially contaminated land will be permitted where:
  - a) the land can be made safe for the proposed use;
  - b) it makes provision for remediation measures; and
  - c) it takes account of ground conditions and land stability.

- 3) The applicant must first investigate the nature of the contamination, taking care to avoid the escape of contaminants which could present an environmental risk.

#### Water Quality

- 4) New development must incorporate well designed mitigation measures to ensure the water environment does not deteriorate, both during construction and during the lifetime of the development to ensure the Water Framework objectives are not compromised.

- 5) Suitable arrangements for the disposal of foul water into a sewerage system must be incorporated at the nearest point of adequate capacity in consultation with the service provider.
- 6) Development proposals will be permitted where they incorporate appropriate measures to mitigate any adverse impact on water quality and water features. Priority will be given to the use of sustainable drainage systems (SUDS) to manage surface water drainage, unless it can be demonstrated that SUDS are not appropriate. Where SUDS cannot be implemented a justification must be provided along with proposed alternative sustainable approaches to surface water management. SUDS should seek to enhance water quality and biodiversity and arrangements should be put in place for their whole life management and maintenance.

#### **Air Quality**

- 7) All development proposals must demonstrate that significant new emission sources will be suitably mitigated to be as low as reasonably practicable.
- 8) Development proposals that would be likely to have significant adverse impacts on air quality or expose the public to existing sources of air pollution, either as a result of the on-site activities or traffic movements, will only be permitted if:
  - a. appropriate mitigation measures are put in place to reduce these impacts to acceptable levels.
  - b. they are designed to minimise the occupants' or users' exposure to air pollution, both internally and externally within areas of poor air quality (as defined by the presence of Air Quality Management Areas) such as Ewell Village.

#### **Noise and Vibration**

- 9) Development proposals that are likely to generate unacceptable noise or vibration or be unreasonably impacted by a noise or vibration source will be permitted where they;
  - a. incorporate appropriate attenuation measures to reduce to acceptable levels the adverse effects of noise or vibration on new and existing residents and businesses, or the environment;
  - b. are accompanied by an acoustic, vibration or other necessary reports.

#### **Light**

- 10) Development proposals for, or which include external lightning will be permitted where there would not be an unacceptable impact on biodiversity, highway safety or to the local amenities of the area.

### **Implementing the policy**

- 8.97 Where development, is proposed on or near a site that may be impacted by, or may give rise to pollution, such proposals must be supported by an assessment that investigates the risks associated with the site and the possible impacts on the development, its future users and the natural and built environment. The assessment must propose adequate mitigation or remediation when required to achieve a safe and acceptable development. This assessment should be written in line with best practice guidance.

- 8.98 The council will work closely with Environmental Health colleagues and other bodies e.g. the Environment Agency where necessary on proposals to ensure issues are adequately addressed.
- 8.99 Development proposals must identify and mitigate any adverse impacts to achieve acceptable levels. Development proposals should consider these impacts from the initial design of the proposal and make provision for appropriate measures from the outset.
- 8.100 Development proposals must follow any guidance provided by the council on local environmental impacts and pollution. During the construction phase of development, including any demolition, it may be necessary to require protection of the local environment from impacts such as dust, fumes, noise, construction traffic and hazardous materials. To minimise these temporary impacts the council will use planning conditions to ensure implementation of Construction Management Plans or Construction Environmental Management Plans where appropriate. Other planning conditions may be used to reduce local environmental impacts to an acceptable level and to secure mitigation measures.

#### Soil Waste/Contaminated Land

- 8.101 Risks from contaminated land can pollute air, water and land and can result from historic contamination and residual waste from historic land uses. The redevelopment of previously developed land (or 'brownfield') sites for beneficial uses, many of which are potentially affected by contamination, provides an important opportunity to deal with the risks posed by contamination.
- 8.102 The council encourages developers to discuss potential contamination with our Contaminated Land Officer at an early stage in the development process. Care should be taken throughout the development process itself, including any preliminary investigations as survey work such as borehole drilling may sometimes release contaminants. Whilst contamination is subject to controls under pollution control legislation, necessary mitigations through the use of planning conditions will be required for development proposals.

#### Water quality

- 8.103 The borough's water supply resource must be safeguarded during development to ensure that development does not lead to pollution or contamination. The Environment Agency and Lead Local Flood Authority (LLFA) Surrey County Council, advocate the use of SuDS to manage the flood and pollution risks resulting from urban runoff and to contribute wherever possible to environmental enhancement, place making, water quality and water quantity improvement benefits on a site by site basis. The effective application of SuDS as part of all future development has the potential to reduce the risk of flooding within the borough.

#### Groundwater protection

- 8.104 The borough's source protection zones (SPZs) which supply local water cover the eastern half of the borough. Development in SPZs must identify additional protection areas to safeguard drinking water quality through constraining the proximity of an activity that may impact upon a drinking water abstraction. Groundwaters must be protected from any potential pollutants to ensure potable water remains unpolluted and safe for the population to consume. The council will

consult with the Environment Agency on proposals for residential, industrial or commercial development which may pose a threat to groundwater resources.

- 8.105 The Environment Agency's approach to groundwater protection document' provides further guidance. The Environment Agency's website also holds information on the location and designation of Groundwater Source Protection Zones and these are shown on the policies map.

#### Air Quality

- 8.106 Clean air is important to avoid the adverse effects of pollutants on people's health and the natural environment. In line with national air quality objectives, the borough carries out a review and assessment of air quality to ensure that national air quality objectives are met. Where existing air quality areas exist in the borough such as Ewell Village, development must be designed to minimise the occupants' or users' exposure to air pollution, both internally and externally. Necessary mitigation measures will be secured through negotiation on a scheme, or through the use of planning obligations or conditions where appropriate.

#### Noise and Vibration

- 8.107 Noise can have a considerable impact on people's health, enjoyment of public places and the environment. Well-designed development can reduce the impacts of noise and vibration exposure and the impact of the development on the environment, the surrounding area, nearby properties and uses. In locations where noise is most likely to have a significant impact, such as in noise sensitive uses such as hospitals, housing and schools, development will need to be designed to reduce its impacts. Developments that are close to noise sensitive areas must minimise the effects of noise both during construction and during the use of the development. Noise from construction during building of major developments will be managed through use of planning conditions.

#### Light

- 8.108 Lighting can contribute to improved safety and security of areas and increase hours of access to sporting facilities in winter months. It is recognised however that artificial lighting from floodlights but also other buildings can be disturbing to some residents, wildlife and the character of the countryside if inappropriately used. Where there are low levels of existing light in areas, controls on new lighting schemes are likely to be particularly important to preserve the amenity and character of the area. When considering light, the council will seek to ensure that unacceptable levels of illumination from proposals are controlled by conditions.

#### **Key supporting documents**

- None

#### **Which existing policy / policies does this supersede?**

- Development Management Policies Document DM17: Contaminated Land

#### **Monitoring the Policy**

- 8.109 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Number of planning decisions including appeals allowing development that is not in accordance with this policy	Planning decisions and appeals

## 9 Infrastructure

### Policy S16: Infrastructure Delivery

#### Why we need the policy

- 9.1 Infrastructure includes all services and facilities necessary to support development. This includes essential utilities such as gas and electricity, water supply and sewerage treatment, broadband and transport. Green infrastructure is also an important part of delivering sustainable development, including the provision of open space and recreation facilities, while community infrastructure such as schools, healthcare facilities and community buildings provide a framework of physical facilities needed to support and sustain a community.
- 9.2 Specific policies elsewhere in this Local Plan deal with some of these forms of infrastructure in more detail.
- 9.3 Existing infrastructure can help to meet the needs of new development where there is spare capacity or opportunities to share facilities. However, to ensure adequate levels of infrastructure are maintained to serve our communities and the economy, new development must mitigate its effects and provide new or improved infrastructure where required.
- 9.4 The council will work with partners including infrastructure and service providers and other stakeholders to ensure that the necessary physical, economic, social and environmental infrastructure is provided.

#### Policy S16: Infrastructure Delivery

- 1) All new development must contribute towards the provision (and where appropriate, maintenance) of infrastructure and services. This includes provision to mitigate against any substantial cumulative effects on existing infrastructure services. The infrastructure necessary to support new development should either be provided on-site as an integral part of the development or be secured off-site through financial contributions via the infrastructure levy.
- 2) Infrastructure must be provided at the appropriate time, prior to the development becoming occupied or becoming operational. Larger developments may need to be phased to ensure that this requirement can be met.
- 3) Development of new infrastructure, in particular infrastructure projects identified in the Infrastructure Plan, that meet needs of the borough and its communities will be permitted, subject to the consideration of other policies within this Local Plan.
- 4) Losses of existing infrastructure will only be permitted where it can be clearly demonstrated there is no longer a need for such infrastructure, or a suitable alternative is provided.

**Implementing the policy**

- 9.5 The council will continue to work in partnership with infrastructure providers and delivery agencies to assess requirements and ensure that infrastructure is delivered and/or upgraded in a timely manner to meet the needs of new development. Developers, particularly of larger schemes, are encouraged to engage with the council and infrastructure providers at an early stage in the planning process.
- 9.6 The council will secure the provision or funding of new infrastructure through planning obligations (S106) and/or the Community Infrastructure Levy (CIL). Currently the council operates a borough wide CIL charging regime and will consider reviewing this to enable infrastructure provision on larger developments to be secured via a S106 agreement. This is due to such sites being more likely to require on-site infrastructure to make the development acceptable in planning terms. Other sites are likely to continue to make contributions under the CIL regime to ensure any cumulative impacts of development on infrastructure can be mitigated. The government has signalled its intention to introduce a new Infrastructure Levy to replace CIL and S106. This will be reflected in the next stage of the Local Plan should details be published in the intervening period.
- 9.7 Proposals which result in the loss of infrastructure will be resisted unless a suitable alternative is provided, or it can be demonstrated there is no longer a need for it. Developers must provide evidence to this effect that consultation with an appropriate range of service providers and the community has taken place.
- 9.8 The council has produced an Infrastructure Plan Baseline Assessment to support the Local Plan. Following consultation, the Council will update the Infrastructure Plan to reflect responses received by infrastructure providers. The Infrastructure Plan will be regularly updated during the preparation and throughout the life of the Local Plan to reflect emerging evidence and needs. The delivery of infrastructure will be funded through a combination of mechanisms, which will include the use of Community Infrastructure Levy funds. The council annually publishes an Infrastructure Funding Statement that sets out the CIL and S106 funds that have been received and how such funds have been spent and are likely to be spent in future years.

**Key supporting documents**

- Infrastructure Plan - Baseline Assessment (2022)

**Which existing policy / policies does this supersede?**

- Core Strategy Policy CS12

**Monitoring the Policy**

- 9.9 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Permitted schemes making on-site provision of infrastructure	Planning decisions and appeals



## Policy S17: Green Infrastructure

### Why we need the policy

- 9.10 Green infrastructure makes an important contribution to the borough's natural capital, providing different functions such as natural flood management and the production of food and timber. It also contributes to cleaning and cooling the air, providing habitats for wildlife and for recreational and cultural activity enhancing our health and wellbeing and to the healthy functioning of the environment.
- 9.11 Green infrastructure can encourage inward investment, help to improve mental and physical health and wellbeing, enhance biodiversity, and assist with climate change mitigation and adaptation.
- 9.12 The council, in partnership with other organisations, will plan for a network of accessible and integrated green infrastructure across the borough and linked to adjoining areas and will strengthen the role of its green infrastructure network over the lifetime of the Local Plan.

### Policy S17: Green Infrastructure

- 1) Development will be supported provided that:
  - a. it protects and enhances the integrity, quality, connectivity and multi-functionality of the existing green infrastructure network and individual sites;
  - b. it enhances green infrastructure, through provision within the site, and supports the findings and guidance set out in the emerging Green Infrastructure Strategy;
  - c. any adverse impacts on the green infrastructure network are fully mitigated through the provision of green infrastructure on site or, where feasible, through appropriate off-site compensatory measures; and
  - d. where new green infrastructure is provided within new development, suitable arrangements are in place for its future funding, maintenance and management. This could be through seeking contributions from developers or through a site management company, where appropriate.
- 2) Development proposals that would result in the loss of green infrastructure will only be supported if an appropriate replacement is provided that is of equivalent or better value in terms of quantity, quality, and accessibility.

### Implementing the policy

- 9.13 The overall aim of the Green Infrastructure policy is to protect and enhance the borough's green infrastructure network, and to ensure that where new green infrastructure is provided with new development, that it is properly managed.
- 9.14 Development should avoid the loss, fragmentation, severance or other significant impacts on the functioning of the green infrastructure network. Development should incorporate green infrastructure as part of its overall design solution or masterplan, protecting and enhancing any existing green infrastructure assets on site and designing in new green infrastructure. Consideration should be given to how green

infrastructure can be utilised to deliver climate change mitigation and adaptation. Where public new green infrastructure is provided such as allotments or open space, arrangements for long term maintenance should be identified which may include a financial payment secured through a planning obligation.

- 9.15 Any additional pressures on the green infrastructure network arising from new development must be fully mitigated. This will normally be addressed through the on-site provision of green infrastructure or if this is not feasible, for example on smaller sites, through off-site measures such as off-site biodiversity improvements, tree planting or upgrading of local green infrastructure facilities.
- 9.16 The provision of green infrastructure on site such as amenity greenspace, tree planting or play areas can more easily be incorporated in larger developments but applicants for smaller schemes are encouraged to consider how green infrastructure can be incorporated into their developments (for example, green roofs, landscaping, gardens and amenity space).

### Key supporting documents

- Epsom and Ewell Green Infrastructure Study (2013)

### Which existing policy / policies does this supersede?

- New Policy

### Monitoring the Policy

- 9.17 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Number of planning decisions including appeals that secure the provision of green infrastructure through new development.	Planning decisions and appeals
Number of planning decisions including appeals allowing the loss of existing green infrastructure.	Planning decisions and appeals

## Policy DM13: Community and Cultural Facilities

### Why we need the policy

- 9.18 The borough's social infrastructure is made up of various community and cultural facilities which support and add to the quality of life of the local community and plays a vital role in the creating sustainable communities. It is important that there is sufficient amount and range of services and facilities to meet the needs of the local communities. The Local Plan will support the safeguarding of existing facilities where possible, and the delivery of additional facilities that meet the borough's needs.

Policy DM13: Community and Cultural Facilities
<ol style="list-style-type: none"> <li>1. Planning permission will be permitted for new or extensions to existing social infrastructure provided that:               <ol style="list-style-type: none"> <li>a) there is a demonstrable identified need;</li> <li>b) it is in a location that well served by public transport and accessible by walking and cycling; and</li> <li>c) it is delivered in flexible and adaptable building/s which could accommodate other social infrastructure uses where practicable, to encourage efficient use of land through mix use and increased public access.</li> </ol> </li> <li>2. The council will only support the loss of existing community and cultural facilities where:               <ol style="list-style-type: none"> <li>a) the proposal is supported by clear and robust evidence that demonstrates that the facility is no longer needed or no longer economically viable to retain in the existing use;</li> <li>b) it has been vacant and actively marketed for a community use without success for at least 18 months; or</li> <li>c) it can be re-provided elsewhere within the borough or provision can be delivered in a different way.</li> </ol> </li> </ol>

### Implementing the policy

- 9.19 Community and cultural facilities include uses such as community halls, theatres, places of worship, schools, education facilities, GPs or health centres, dentists, libraries, civic centres, indoor and outdoor sports facilities, and public houses.
- 9.20 The council will continue to work closely with its partners and service providers to ensure the borough's needs can be met. This will be informed by the council's Infrastructure Plan.
- 9.21 New provision should be located in sustainable locations, ensuring good accessibility by a wide range of travel modes.
- 9.22 The council will require any loss to be fully justified, with at least 18 months' active marketing undertaken in accordance with the requirements of Appendix 4.
- 9.23 It is important to maximise the use of existing facilities given the limited land availability for new facilities. The council will support proposals for facilities or "hubs"

that accommodate a mix of community uses to enable the most efficient use spaces/facilities.

### Key supporting documents

- Infrastructure Plan – Baseline Assessment (2022)

### Which existing policy / policies does this supersede?

- Core Strategy Policy CS13 Community and Cultural facilities
- Development Management Policies Document – Policy DM34 New Social Infrastructure

### Monitoring the Policy

- 9.24 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Gains/losses of Use Class F1 and F2 facilities	Planning decisions and appeals
Developer contributions securing social and community infrastructure.	Funding and space secured (authority monitoring report)

## Policy DM14: Education Infrastructure

### Why we need the policy

- 9.25 For its size, the borough contains a wide range of education infrastructure ranging from primary and secondary schools in both the public and private sectors to further and higher education facilities.
- 9.26 It is home to three further and higher education campuses, notably the University of Creative Arts, North East Surrey College of Technology (NESCOT) and Laine Theatre Arts, in addition to 6<sup>th</sup> form facilities at schools that play a valuable role in supporting the social fabric and economic success of the borough and its residents.
- 9.27 Education establishments often provide a range of educational, recreational and sporting facilities which can be used to meet a variety of needs not only for pupils, but for local communities.

Policy DM14: Education Infrastructure	
1.	Development proposals for the intensification and enhancement of established education facilities in the borough will be supported.
2.	Proposals which maximise the extended or multiple use of educational facilities for community or recreational use will be supported.

**Implementing the policy**

- 9.28 The council will support investment in the existing educational infrastructure to ensure facilities continue to support changing needs and demands. The council also wishes to encourage such facilities to be available for use by the wider community wherever possible, to improve access to sporting activities and other community-based activities. For example, our evidence has shown that there is a need for additional playing pitches and sports halls which could partly be met by utilising existing or new educational infrastructure.

**Key supporting documents**

- Infrastructure Plan – Baseline Assessment (2022)

**Which existing policy / policies does this supersede?**

- New Policy

**Monitoring the Policy**

- 9.29 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Number of planning decisions including appeals allowing additional education floorspace	Planning decisions and appeals

**Policy DM15: Open Space, Sport and Recreation****Why we need the policy**

- 9.30 Access to open spaces and opportunities for sport and recreation make a valuable contribution to people's health and well-being.
- 9.31 Open spaces often have a multi-functional role, being havens for biodiversity, providing a range of leisure and recreational opportunities and helping to alleviate and mitigate against the impacts of climate change. Open spaces also play a key role in flood risk management and are key elements to developing successful Sustainable Urban Drainage (SUDS) systems.
- 9.32 The purpose of this policy is to ensure that the range and quality of open space, sport and recreation provision is maintained and improved where needs are identified, to ensure it meets the needs of the communities they serve.

### Policy DM15: Open Space, Sport and Recreation

- 1) Proposals which complement and enhance the value and use of open spaces for recreation, biodiversity and/or nature conservation and climate change adaptation/mitigation will be considered favourably.
- 2) Proposals for new and improved, refurbished, replacement or extended indoor and built sport and recreational facilities must be of high quality and optimise accessibility to all users.
- 3) All development which would result in a net increase in residential units will be required to contribute towards open space, sport and recreation provision. This will either be through financial contributions via the infrastructure levy, or on-site provision. Where a development is required to make on-site provision, this must be an integral part of the development and have in place appropriate long term stewardship arrangements to secure the quality of the open space in perpetuity.
- 4) Proposals which result in a loss of open space and/or sport and recreational buildings/land will only be considered where supported by robust evidence and will be assessed in line with national policy.

#### Implementing the policy

- 9.33 Existing open space, sport and recreational buildings and land, including playing fields, will be safeguarded in accordance with national policy. The general expectation will be that proposals affecting this type of existing infrastructure will include provision for equivalent or better-quality provision.
- 9.34 Policy SA8 proposes allocating a site that currently provides sports (Rugby) pitches for residential led development. To mitigate the loss of these pitches it is proposed through Policy SA9 proposes allocating some of the land at Hook Road Arena to provide replacement sports pitches of improved quality in addition to supporting infrastructure such as changing facilities. The new facilities proposed at Hook Road Arena site will need to be operational prior to the redevelopment of the existing pitches.
- 9.35 All new development is expected to contribute towards the provision (and where appropriate, maintenance) of infrastructure, which includes open spaces, sports and recreational facilities. Past development trends within the borough have shown that many of the windfall (that is, unidentified) sites which come forward for development are small in size and this trend is expected to continue. It is therefore assumed that in most cases, such sites will be expected to mitigate their impact upon open space, sport and recreation facilities through a financial contribution via the infrastructure levy.
- 9.36 However, on larger sites and/or in areas where there is an identified deficit/need for this type of infrastructure, there may be a requirement for on-site provision. Developers are therefore encouraged to discuss their proposals with the council at an early stage.

**Key supporting documents**

- Open Space Audit Update (2022)
- Sports Facilities Assessment (2021)
- Playing Pitch Strategy (2021)

**Which existing policy / policies does this supersede?**

- Core Strategy Policy CS4: Open Spaces and Green Infrastructure
- Development Management Policy Document – Policy DM6: Open Space Provision

**Monitoring the Policy**

- 9.37 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Number of planning decisions including appeals allowing losses of open space or sport and recreational buildings/land	Planning decisions and appeals
Number of planning decisions including appeals which create new or enhance open space or sport and recreational buildings/land	

**Policy S18: Transport****Why we need the policy**

- 9.38 The borough benefits from transport infrastructure made up of various components to accommodate travel needs of residents and visitors. As the borough develops and changes, the transport network will need to support future growth and changes and therefore will be an important consideration when planning development. Where new development is proposed, this will need to integrate with the existing local transport networks and be able to support a range of different modes of travel with emphasis on sustainable modes of transport including public transport, walking and cycling. Development will have an impact on the existing transport network therefore will need to be appropriately located in relation to highways, public transport networks, provide parking in accordance with out Parking Standards and facilitate use of sustainable modes of transport.
- 9.39 Surrey County Council is the Highway Authority and has published the Surrey Local Transport Plan 4 which provides the long-term framework for transport policies for the area. It seeks to significantly reduce carbon emissions from transport and reduce use of the private car to meet the commitment of net zero emissions by 2050 and address congestion.



9.40 To assist in meeting the objective of net zero, the council, working in partnership with Surrey County Council and other transport stakeholders, aims to:

- Avoid unnecessary travel by reducing the number and length of trips needed. The council aims to achieve this through improving planning for homes and employment sites, travel planning and levels of digital connectivity;
- Shift travel choices to more sustainable modes of transport, including public transport, walking and cycling, away from car use; and
- Improve the energy efficiency of vehicles and operational efficiency of roads through technology improvements.

### Policy S18: Transport

- 1) To ensure the delivery of a sustainable transport network, new development in the borough will:
  - a) need to be well designed to promote, safe accessibility and movement which prioritise the access needs of pedestrians and cyclists, protecting and enhancing pedestrian and cycle access routes;
  - b) improve existing walking and cycling routes to local facilities, services, bus stops and railway stations;
  - c) where appropriate and practicable, provide on-site facilities for cyclists, including showers, lockers and secure, convenient cycle parking (in accordance with the standards detailed in Appendix 5);
  - d) meet the council's parking standards with consideration given to highway safety and congestion;
  - e) provide opportunities to establish car clubs and cycle rental schemes or other similar schemes; and
  - f) provide facilities situated in convenient and easy to use locations that will increase the uptake of electric and other zero emission vehicles.
- 2) Where any new development would generate a significant number of trips by users of the development (these would include but are not limited to development of educational establishments, large business premises or residential developments of 50 homes or more) the council will require:
  - g) planning applications to be accompanied by a Transport Assessment; and
  - h) developers to develop, implement and keep up to date a proportionate, robust and effective on-site plan associated with the development which contains measures to reduce car use and promote sustainable transport modes car use and promote sustainable transport modes.
- 3) Car free development will be encouraged in appropriate locations and where supported by evidence demonstrating that proposals would not lead to parking stress.

### Implementing the policy



- 9.41 The planning process for new developments provides the opportunity to maximise the use of sustainable and active travel modes such as walking, cycling and the increased use of public and community transport. This also provides an opportunity to ensure that people with disabilities can access all modes of transport. This is consistent with the National Planning Policy. Due to borough's size and relationship with neighbouring local authority areas, cycling has the potential to replace short car journeys. By providing safe and accessible routes this will encourage the increased use of cycles to facilitate this modal shift.
- 9.42 The council will work with stakeholders and Surrey County Council to further develop the Infrastructure Plan, which will set out the key infrastructure required to support the delivery of the Local Plan. Growth over the Plan period will give rise to increased traffic volumes and it is therefore required that this be mitigated as far as possible.
- 9.43 The policy sets out the measures by which the council will seek to mitigate against the impacts and will require new developments to adopt the relevant standards to achieve this.
- 9.44 The council's parking standards are set out in Appendix 5. National Policy encourages the setting of maximum parking standards where there is a clear and compelling justification that they are necessary for optimising the density of development in town centres that are well served by public transport. This policy does not preclude developers from bringing forward proposals for new development that do not provide parking for private motor vehicles.
- 9.45 All major developments require the submission of a Transport Assessment and Travel Plan. These documents set out the potential transport impacts of the proposals, how these will be addressed and how sustainable travel will be delivered in the long term. There may be occasions where smaller developments have lower impacts and therefore a Transport Statement may be necessary unless it can be demonstrated to the satisfaction of the council that the changes are minor. Such assessments will be subject to liaison between the council and the highway authority or authorities.
- 9.46 The council will use the emerging Local Cycling and Walking Infrastructure Plan (LCWIP) and any successor documents, as a basis for prioritising and identifying schemes to secure improvements for sustainable and active travel and future opportunities.
- 9.47 Prospective developers are encouraged to engage with the council and Surrey County Council at the pre-application stage in order to ensure the successful integration of development proposals to the wider transport network.
- 9.48 As the local transport authority, Surrey County Council will be consulted on transport matters at the planning application stage, developers are advised to refer to the county council's Transportation Development Planning: Good Practice Guide (2020) for further information required for the development.

### **Key supporting documents**

- Surrey County Council Local Transport Plan (LTP4) 2022
- The Building Regulations Approved Document S: infrastructure for charging electric vehicles

### **Which existing policy / policies does this supersede?**

- Core Strategy - Policy CS16 Managing transport and travel

### Monitoring the Policy

- 9.49 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Walking, cycling, bus and rail modal share for travel to work journey of Epsom and Ewell residents (expressed as a percentage)	Census – every 10 years

## Policy DM16: Digital Infrastructure and Communications

### Why we need the policy

- 9.50 Good telecommunications, and the infrastructure that it requires, is an essential part of modern day living and supports economic growth. However, poorly designed and poorly sited equipment can have a detrimental impact on the character and appearance of a building and the wider area.
- 9.51 Over the plan period, the use and demand of digital connections in homes and businesses will continue to grow. It is therefore important that new developments must be 'futureproofed' with appropriate digital infrastructure that will meet existing and future communication needs. It is essential that the council works with developers and digital infrastructure providers to make sure that the appropriate digital infrastructure is incorporated into new developments.
- 9.52 This policy provides clear assessment criteria and guidance to applicants about the considerations to be considered when planning for future telecommunications and utilities equipment.

### Policy DM16: Digital Infrastructure and Communications

- 1) Proposals for all residential or commercial development will be permitted where it is demonstrated through a Site Connectivity Statement that they are provided with up to date communications infrastructure. This should be through provision of Fibre to the Premises (FTTP) unless demonstrable reasons why this is not feasible are provided, or alternative technologies are available.
- 2) Planning permission for telecommunications development will be permitted where it can be demonstrated that:

- a) the proposal does not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation that is operated in the national interest;
- b) evidence is provided to demonstrate that there is no reasonable possibility of sharing existing facilities in the locality (either in terms of antennae, buildings or sites);
- c) the visual and amenity impact is minimised by the considered siting and design of the development; and
- d) long-term requirements are considered (where appropriate) to minimise further works.

### **Implementing the policy**

- 9.53 In order to improve quality of life, support and facilitate home working, support local businesses and education providers and enable access to digital services, the council will require developments comprising new homes and/or commercial development, are provided with the most up to date digital connections unless for technical or viability reasons it can be demonstrated that this is not achievable. There may also be circumstances where the operators themselves have concluded that servicing the site is not practical.
- 9.54 As Fibre to the Premises is normally delivered via underground ducting, the most opportune time for it to be made available to new build sites is when other utilities are being delivered. Applicants will need to undertake early dialogue with telecom providers to ensure they understand the infrastructure specification and requirements, so they can be incorporated into the design of new development at an early stage.
- 9.55 Applications for residential or commercial development must be supported by a Site Connectivity Statement, detailing the engagement undertaken with telecom provider(s) and establishing how Fibre to the Premises will be provided or if it is not to be provided the reasons why, and the alternative technologies to be utilised.
- 9.56 Where there is a need for new telecommunications equipment such as masts and base stations, and planning permission is required, applicants will be expected to demonstrate that these are necessary and are sympathetically designed and located in line with national and relevant Local Plan policies.
- 9.57 In order to minimise the impact of new equipment, all opportunities should be taken to share existing facilities and applicants will be expected to demonstrate this has been explored.

### **Key supporting documents**

None

### **Which existing policy / policies does this supersede?**

- New Policy

**Monitoring the Policy**

- 9.58 The following indicators and data sources will be used to monitor the effectiveness of the policy:

Indicator	Data source(s)
Number of planning decisions including appeals allowing new telecommunications and digital infrastructure	Planning decisions and appeals

# 10 Appendices

## Appendix 1 - Glossary

**Active Frontage:** A frontage to the public realm which is characterised by multiple entrances and windows (domestic, commercial or retail), allowing an interaction of people between the public realm and the premises facing the street.

**Affordable housing:** Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

**a) Affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

**b) Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.

**c) Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

**d) Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

**Aged or veteran tree:** A tree which, because of its great age, size or condition is of exceptional value for wildlife, in the landscape, or culturally

**Amenity:** The pleasant or normally satisfactory aspects of a location which contribute to its overall character and the enjoyment of residents or visitors.

**Ancient Woodland:** An area that has been wooded continuously since at least 1600 AD.

**Ancillary Use / Operations:** A subsidiary or secondary use or operation closely associated with the main use of a building or piece of land.

**Authority Monitoring Report (AMR):** A report prepared by local planning authorities assessing progress with and the effectiveness of a Local Plan.

**Appropriate Assessment (also known as Habitats Regulation Assessment):** If a proposed plan or project is considered likely to have a significant effect on a protected habitats site (either individually or in combination with other plans or projects) then an appropriate assessment of the implications for the site, in view of the site's conservation objectives, must be undertaken (Part 6 of the Conservation of Habitats and Species Regulations 2017 (or as amended)).

**Biodiversity:** The whole variety of life encompassing all genetics, species and ecosystem variations, including plants and animals.

**Biodiversity Opportunity Area (BOA):** Areas where there are recognised concentrations of sites of biodiversity importance, both statutory and non-statutory

**Biodiversity Net Gain (BNG):** Approach to development that seeks to leave the environment in a measurably better state than beforehand.

**BREEAM:** Building Research Establishment Environmental Assessment Method – is a method for assessing, rating and certifying the sustainability of buildings.

**Brownfield land:** Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

**Climate Change Adaptation:** Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.

**Climate Change Mitigation:** Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions. Mitigation can mean using new technologies and renewable energies, making older equipment more energy efficient, or changing management practices or consumer behaviour.

**Community Facilities:** Includes, but is not limited to, facilities such as community centres and other community meeting places, healthcare facilities, education facilities, childcare

facilities, public houses, the voluntary sector, public service providers, places of worship and cultural facilities including theatres and arts centres.

**Community Infrastructure Levy:** A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

**Conditions (or 'planning condition'):** Requirements attached to a planning permission to limit, control or direct the manner in which a development is carried out.

**Conservation Area:** Areas of special architectural or historic interest which are designated to offer greater protection to the built and natural environment.

**Contaminated Land:** Land that has been polluted or harmed in some way making it unfit for safe development and usage unless cleaned.

**Conversions:** Generally means the physical work necessary to change the use of a building from a particular use, classified in the use classes order, to another use. Can also mean the sub-division of residential properties into self-contained flats or maisonettes.

**Curtilage:** The area normally within the boundaries of a property surrounding the main building and used in connection with it.

**Deliverable:** To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.

**Density:** In the case of residential development, a measurement of either the number of habitable rooms per hectare or the number of dwellings per hectare (dph).

**Design Code:** A set of illustrated design rules and requirements which instruct and may advise on the physical development of a site or area. The graphic and written components of the code are detailed and precise, and build upon a design vision such as a masterplan or other design and development framework for a site or area.

**Design Guide:** A document providing guidance on how development can be carried out in accordance with good design practice often produced by a local authority with a view to retaining local distinctiveness.

**Developable:** To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

**Duty to Co-operate:** A legal duty on local planning authorities to engage constructively, actively and on an ongoing basis with prescribed bodies to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters

**Edge of Centre:** For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

**Evidence Base:** Information gathered by a Local Planning Authority to support the Local Plan and other Development Plan Documents.

**Exception Test (Flood Risk):** The Exception Test provides a method of managing flood risk while still allowing necessary development to occur. The criteria of the test are set out in national guidance, and should be applied by decision-makers in relation to site allocations and development proposals only after the sequential test has been applied.

**Extra Care Housing:** For people whose disabilities, frailty or health needs make ordinary housing unsuitable but who do not need or want to move to long-term care (residential or nursing homes). It is used to describe a range of developments that comprise self-contained homes which have been designed, built or adapted to facilitate the care and support needs that its owners/tenants may have now or in the future, with access to care and support 24 hours a day, either on site or by call. It is also known as 'assisted living'..

**Flood plain:** Generally low-lying areas adjacent to a watercourse, tidal lengths of a river or the sea, where water flows in times of flood or would flow but for the presence of flood defences.

**Flood Zones:** Flood Zones refer to the probability of river flooding. They are shown on the Environment Agency's Flood Map and within the council's Strategic Flood Risk Assessment (SFRA) which defines the borough's flood maps. Flood Zone 1 is low probability; Flood Zone 2 is medium probability; Flood Zone 3a is high probability and Flood Zone 3b is functional flood plain where land has to be stored or flows at times of flooding.

**Functional Economic Area:** An area which has strong internal trading patterns and within which businesses co-operate and compete. The area is also heavily influenced by travel to work areas as the availability of labour is vital to economic development.

**Green Belt (GB):** A national designation of land around certain cities and large built-up areas, which aims to prevent urban sprawl by keeping land permanently open. Green Belt is not an environmental designation.

**Green corridor / wildlife corridor:** Green corridors can link housing areas to the national cycle network, town and city centres, places of employment and community facilities. They help to promote environmentally sustainable forms of transport such as walking and cycling within urban areas and can also act as vital linkages for wildlife dispersal between wetlands and the countryside.

**Green Infrastructure (GI):** A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

**Groundwater:** An important part of the natural water cycle present underground, within strata known as aquifers.

**Government's standardised methodology:** A standardised approach set out by Government to determine the objectively assessed housing needs of an area.

**Groundwater Source Protection Zones (SPZs):** Areas defined by the Environment Agency to prevent contamination of groundwater sources used for public drinking water supply.



**Gypsies and Travellers:** Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such. Please note: This definition is taken from Planning policy for traveller sites (August 2015). Following a Court of Appeal judgement in October 2022 this definition is likely to be amended.

**Heritage Asset:** A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

**Housing Market Area:** The general area within which people most often move home. These typically cover the administrative areas of multiple councils.

**Highway Authority:** Surrey County Council (SCC), as highway authority, is charged with looking after most of the highway network on behalf of the public. This means both maintaining its condition and protecting the right of all to use it without hindrance.

**Historic Environment:** All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

**Historic Parks and Gardens:** A park or garden of special historic interest. Graded I (highest quality), II\* or II. Designated by English Heritage. Nonsuch Park is the only park included on the Register of Historic Parks and Gardens of special historic interest in England.

**Housing Trajectory:** A chart showing the indicative amount of housing to be delivered in each year of the plan period

**Infrastructure:** The set of services and facilities necessary for a development to function. Infrastructure includes transport, education, leisure and health facilities, as well as open space and utilities, such as water and sewerage.

**Infrastructure Plan (IP):** The Infrastructure Plan (IP) forms part of the evidence base for the Local Plan. It assesses the infrastructure capacity and needs of the borough and provides an overview of the way infrastructure is planned and the agencies involved in its delivery. It also looks at costs and likely funding mechanisms for infrastructure, and forms the basis for assessing contributions that would be sought to meet the needs of new development.

**Land Availability Assessment:** A document that forms part of the evidence base of the Local Plan and identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.

**Listed building:** Buildings which are identified as having special architectural or historic importance and so are protected from demolition or inappropriate alteration or development by legislation and by planning policies. Protection also applies to certain other structures within the curtilage of Listed Buildings. The categories of listed buildings are:- Grade I - buildings of exceptional interest, Grade II\*- buildings of more than special interest, Grade II – buildings of special interest.

**Local Centre:** A local centre offers a small range of shops and limited service outlets and play an important role in meeting the day-to-day shopping needs for Communities. Ewell Village and Stoneleigh Broadway are Local Centres.

**Local Development Scheme (LDS):** The LDS sets out the councils programme for preparing future planning documents. It outlines what documents the council will be working on and a timetable for the production of these documents.

**Local Nature Partnership (LNP):** A body, designated by the Secretary of State for Environment, Food and Rural Affairs, established for the purpose of protecting and improving the natural environment in an area and the benefits derived from it. The LNP for Epsom and Ewell is the Surrey Nature Partnership.

**Local Nature Reserve:** Non-statutory habitats of local significance designated by local authorities where protection and public understanding of nature conservation is encouraged.

**Local Plan:** The plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan.

**Local Transport Plan:** A statutory document prepared by Surrey County Council to set out key transport issues across the County and to establish a series of objectives to address them, including a programme for achieving them.

**M4 (2) Accessible and Adaptable Dwellings:** An optional requirement as defined in the Building Regulations. M4 (2) will be met where a new dwelling makes reasonable provision for most people to access the dwelling and incorporates features that make it suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users. M4 (3) Wheelchair User Dwellings - An optional requirement as defined in the Building Regulations.

**M4 (3) 'Wheelchair User Dwellings':** include two different types of dwelling as follows: 1. Wheelchair adaptable dwellings which must be designed to allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs (M4 (3)(2)(a)); and 2. Wheelchair accessible dwellings which must be designed and built with the necessary features/adaptations included to enable it to meet the needs of occupants who use wheelchairs at the point of completion (M4 (3) (2)(b)).

**Main town centre uses:** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

**Major Development:** For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m<sup>2</sup> or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

**Market Housing:** Private housing for rent or for sale, where the price is set in the open market.

**National Planning Policy Framework (NPPF):** The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

**National Planning Policy Guidance (NPPG):** The planning practice guidance supports that support the National Planning Policy Framework.

**Neighbourhood Forums:** Neighbourhood Forums comprise of an Organisation or group empowered to lead the neighbourhood planning process where a neighbourhood area is unparished. The Organisation or group must apply to the local planning authority for its formal designation.

**Neighbourhood Plans:** A plan prepared by a Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

**Older people:** People over retirement age, including the active, newly-retired through to the very frail elderly, whose housing needs can encompass accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs.

**Open space:** Land that is not built on and which has some amenity value or potential for amenity value. Amenity value is derived from the visual, recreational or other enjoyment which the open space can provide, such as historic and cultural interest and value as well as opportunities for sport and recreation

**Overlooking:** A term used to describe the effect when a development or building affords an outlook over adjoining land or property, often causing loss of privacy.

**Pitch (Gypsy and Traveller):** Area accommodating a single household on a gypsy and traveller site, normally accommodating one static and one travelling caravan, utility block and space for parking and ancillary residential uses. The number of permitted caravans may be defined through planning conditions and/or the caravan site licensing.

**Planning condition:** A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

**Planning Inspectorate:** The Planning Inspectorate's work includes national infrastructure planning under the Planning Act 2008 process (as amended by the Localism Act 2011), processing planning and enforcement appeals and holding examinations into local plans and community infrastructure levy charging schedules.

**Planning obligation:** A legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal. Sometimes called "Section 106" agreements.

**Policies Map:** A map of the borough showing the Local Plan's proposals and where policies apply.

**Pollution:** The introduction of contaminants into the environment that cause adverse change. Pollution can take the form of chemical substances or energy, such as noise, heat or light.

**Previously developed land:** Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.

The Glossary (Annex 2) of the NPPF 2021 also provides a list of exclusions for land that is considered not to fall in the category of being previously developed.

**Primary Shopping Area:** Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).

**Priority habitats:** Cover a wide range of semi-natural habitat types and are habitats identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP)

**Protected Species:** Plants and animal species afforded protection under certain Acts and Regulations.

**Registered Providers:** Registered Providers are government funded not-for-profit organisations that provide affordable housing. They include housing associations, trusts and cooperatives. They work with local authorities to provide homes for people meeting the affordable homes criteria. As well as developing land and building homes, they undertake a landlord function by maintaining properties and collecting rent.

**Renewable and Low Carbon Energy:** Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

**Retail Impact Assessment:** An assessment undertaken for an application for retail use on the impact of the proposal on the vitality and viability of existing centres within the catchment area of the proposed development. The assessment includes the likely cumulative effect of recent permissions, developments under construction and completed developments.

**Scheduled Ancient Monument:** Nationally important monuments usually archaeological remains, that enjoy greater protection against inappropriate development through the Ancient Monuments and Archaeological Areas Act 1979.

**Section 106 Agreement:** A legal agreement under section 106 of the 1990 Town & Country Planning Act. Section 106 agreements are legal agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer, that ensure that certain extra works related to a development are undertaken.

**Sequential Test (Town Centre Uses):** A systematic approach which aims to focus new economic growth and the development of main Town Centre uses within existing centres in the interests of vitality and viability. This is defined in greater detail in national guidance.

**Sequential Test (Flood Risk):** A test based on flood risk, which should be applied at all stages of planning in order to steer new development to areas at the lowest probability of flooding.

**Source Protection Zones:** Areas defined by the Environment Agency for groundwater sources such as wells, boreholes and springs used for public water drinking supply. They show the risk of contamination from any activities that might cause pollution in the area.

**Site of Nature Conservation Importance (SNCI):** Locally important sites of nature conservation adopted by local authorities for planning purposes.

**Site of Special Scientific Interest (SSSI):** A site designated by Natural England under the Wildlife and Countryside Act 1981 as an area of special interest by reason of any of its flora, fauna, geological or physiographical features (plants, animals and natural features relating to the Earth's structure).

**SME (Small to medium Enterprise):** An independent business managed by its owner or part owners and having a small market share either by number of employees or turnover.

**Specialist Housing:** Housing specifically designated to meet the identified needs of older people and people with support needs. It can include extra care housing.

**Strategic Flood Risk Assessment (SFRA):** A study that provides information on the probability of flooding from all sources, such as that from rivers, surface water, groundwater and sewers. The SFRA is used to ensure that, in allocating land or determining applications, development is located in areas at lowest risk of flooding.

**Sui-Generis:** A term given to the uses of land or buildings, not falling into any of the use classes identified by the Use Classes Order, for example theatres, launderettes, car showrooms and filling stations.

**Supplementary Planning Documents (SPD):** Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

**Sustainability Appraisal (SA):** Sustainability Appraisal is a tool used to appraise planning policy documents in order to promote sustainable development. Social, environmental and economic aspects are all taken into consideration. Sustainability Appraisal is a compulsory requirement under the Planning and Compulsory Purchase Act 2004 and UK Law.

**Sustainable Development:** Development that meets the needs of the present without compromising the ability of future generations to meet their own needs. There are three dimensions to sustainable development: economic, social and environmental.

**Sustainable Drainage Systems (SuDS):** The term Sustainable Drainage Systems covers the range of drainage elements for managing surface water in a way which is more sympathetic to the natural and human environment than conventional below-ground drainage systems.

**Sustainable transport modes:** Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.

**Town Centre:** Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres and local centres but exclude small parades of shops of purely neighbourhood significance (neighbourhood parades). Unless they are identified as centres in the Local Plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

**Travelling Showpeople:** Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

**Tree Preservation Order (TPO):** A mechanism for securing the preservation of single or groups of trees of acknowledged amenity value. A tree subject to a tree preservation order may not normally be topped, lopped or felled without the consent of the local planning authority.

**Use Classes Order:** The Town and Country Planning (Use Classes) Order 1987 puts uses of land and buildings into various categories. Planning permission is not needed for changes of use within the same use class.

**Vacant building credit:** Where a vacant building is brought back into any lawful use or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution.

**Windfall Site:** Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available.

**Zero-carbon Home:** Over a year, the net carbon emissions from all energy use in the home are zero. This includes energy use from cooking, washing and electronic entertainment appliances as well as space heating, cooling, ventilation, lighting and hot water.

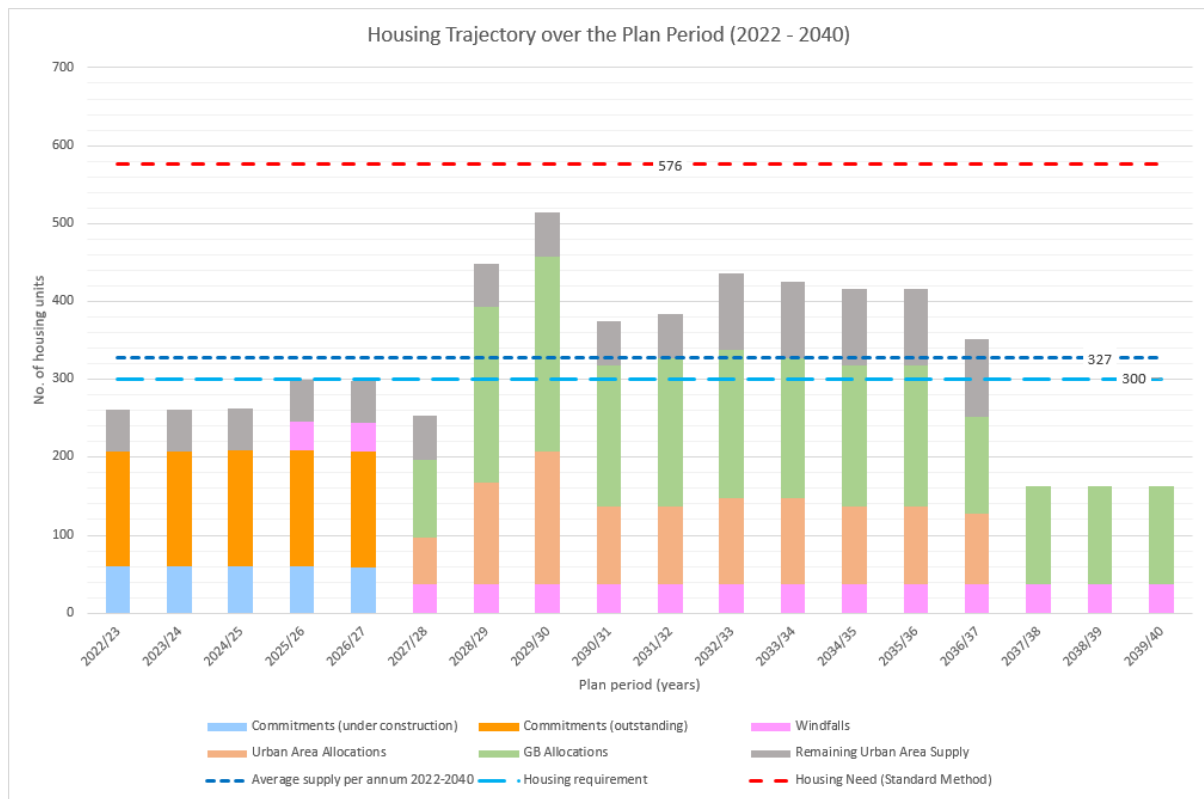
## Appendix 2 – Urban LAA sites which do not benefit from a specific site allocation

Address	ward	LAA Ref	Potential Yield	Area (ha)
Land rear of Rowe Hall, Salisbury Road, KT4	Auriol	AUR001	30	1.23
7 Station Road, Stoneleigh	Auriol	AUR004	10	0.03
Builders Yard Mill Road	College	COL001	15	0.43
Former Dairy Crest Site, 4 Alexandra Road	College	COL002	20	0.44
25 Alexandra Road Epsom Surrey KT17 4BP	College	COL006	10	0.20
35 Alexandra Road	College	COL016	9	0.10
Gainsborough Road estate, Epsom	Court	COU020	15	0.26
Parking at 54 Gainsborough Road	Court	COU021	10	0.10
Garages at Somerset Close & Westmorland Close	Court	COU045	6	0.10
Garages Morland Court, Ardrossan Gardens	Cuddington	CUD002	16	0.18
5 Ruxley Lane, Ewell	Ewell Court	EWC001	30	0.18
TA Centre Welbeck Close	Ewell	EWE001	62	1.02
Ewell Autoway & Tesco Express, 26 Reigate Road	Ewell	EWE004	20	0.57
Homebase 23 Reigate Road Ewell Surrey KT17 1PE	Ewell	EWE005	64	1.59
Land west of Ewell By-Pass	Ewell	EWE012	46	0.87
106-112 East Street	Ewell	EWE016	15	0.10
Etwell House, Station Road	Nonsuch	NON001	10	0.19
Public House (Toby Carvery) 45 Cheam Road	Nonsuch	NON002	35	0.46
47 Cheam Road Ewell Surrey KT17 3EB	Nonsuch	NON003	9	0.10
Hatch Furlong Nursery, east of Ewell By-Pass	Nonsuch	NON004	25	0.52
Cox Lane Community Centre	Ruxley	RUX001	15	0.24
Scotts Farm Road	Ruxley	RUX004	6	0.07
Crane Court/Rowden Rd (Garage)	Ruxley	RUX005	9	0.18
442 Chessington Road and Coach Park	Ruxley	RUX006	14	0.33
Behind Texaco Petrol Station, Ruxley Lane	Ruxley	RUX007	6	0.19
Petrol Station at cnr of Chessington & Ruxley Ln	Ruxley	RUX015	5	0.10
140-142 Ruxley Lane West Ewell Surrey KT19 9JS	Ruxley	RUX023	20	0.20
Eclipse Business Park, West Hill	Stamford	STA001	25	0.38
The Wells Centre, Spa Drive	Stamford	STA004	20	0.33
Kingswood School	Stamford	STA006	30	1.27
1 Beaufort Way	Stoneleigh	STO008	30	0.56
Conservative Club, Epsom Club and Church	Town	TOW002	40	0.38
TKMaxx	Town	TOW007	65	0.14
Land R/O The Albion Public House (McCaffertys Bar)	Town	TOW008	8	0.14
Swail House	Town	TOW010	100	1.04
32 Waterloo road and BRM Coachworks	Town	TOW013	35	0.23

24-28 West Street, Epsom, KT18 7RJ	Town	TOW015	15	0.05
Spread Eagle Shopping Centre	Town	TOW016	15	0.18
79-85 East Street, Epsom	Town	TOW017	20	0.21
Finachem House, 2-4 Ashley Road	Town	TOW020	42	0.12
Corner of Kiln Lane & East Street	Town	TOW043	20	0.03
107-111 East Street, Epsom	Town	TOW044	6	0.06
Downside House 1 Downside Epsom Surrey KT18 5ET	Town	TOW054	5	0.10
Richards Field car park, Chessington Road	West Ewell	WEW004	10	0.07
64 South Street, Epsom	Woodcote	WOO004	6	0.13
22-24 Dorking Road	Woodcote	WOO022	18	0.12
			1042	15.77



## Appendix 3: Housing Trajectory



Source of Supply	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	Total (2022-2040)
Commitments (under construction)	60	60	60	60	58														298
Commitments (outstanding)	148	148	149	149	149														743
Windfalls				37	37	37	37	37	37	37	37	37	37	37	37	37	37	37	561
SA1 - Hook Rd and SGN								90	100	100	110	110	100	100	90				800
SA2 - Town Hall, Hope Lodge, Epsom Clinic							40	50											90
SA3 - Depot Rd and Upper High Street						30	40	30											100
SA4 - Ashley Centre and Global House						30	50												80
SA5 - Land at West Park Hospital						50	50	50											150
SA6 - Horton Farm							125	125	125	125	125	125	125	125	125	125	125	125	1500
SA7 - Land at Chantilly Way								25											25
SA8 - Land adjoining Ewell East Station									55	65	65	55	55	55					350
SA 9 - Hook Road Arena						50	50	50											150
Urban LAA Sites	53	53	53	53	54	56	56	57	57	57	98	98	99	99	99				1042
<b>Annual Supply</b>	<b>261</b>	<b>261</b>	<b>262</b>	<b>299</b>	<b>298</b>	<b>253</b>	<b>448</b>	<b>514</b>	<b>374</b>	<b>384</b>	<b>435</b>	<b>425</b>	<b>416</b>	<b>416</b>	<b>351</b>	<b>162</b>	<b>162</b>	<b>162</b>	<b>5889</b>

## Appendix 4: Guidance on the Marketing Requirements for Change of Use Applications

### 1. Introduction

The guidance provides clarification on the marketing and economic viability evidence that would be required from applicants proposing schemes that would result in the loss of certain uses. These include employment land, local retail facilities, visitor accommodation and community facilities.

This guidance is intended to support applicants, agents and developers so that they can provide the council with all the information it needs to determine applications for change of use of certain buildings, sites or land. The requirement to demonstrate that a site has been effectively marketed before a change of use can be considered is found throughout the various policies within the Local Plan.

Section 1 of this guidance sets out the policy context for marketing and viability requirements.

Section 2 explains the minimum action required when actively marketing premises and/or sites, and outlines the marketing evidence which must be provided to the council when submitting an application for change of use.

Section 3 provides information on the financial viability evidence required to demonstrate that the premises and/or site is no longer suitable for its current type of use.

Section 4 specifically applies to applications for the loss of community facilities and sets out requirements for demonstrating a lack of need for the facility.

The types of use for which marketing, viability testing and/or need testing are required, before an application for their change of use can be permitted, are set out in Table 1, along with the minimum marketing period expected.

**Table 1: Types of Use and Minimum Marketing Periods**

Local Plan policy	Land Use	Minimum marketing period
Policy DM5: Neighbourhood Parades and Isolated Shops	Main town centre uses (as defined by the NPPF)	12 months
Policy S11: Economic Development	Uses are those that fall within Classes B2, B8 and E (g) of the Use Classes order and Sui Generis uses that do not fall within the aforementioned use classes but have similar accommodation and location requirements (for example trade counters).	12 months
Policy DM6: Equestrian and Horse Racing Facilities	Racehorse training or equestrian	18 months

Policy DM7: Visitor Accommodation	Visitor accommodation (holiday or short stay accommodation)	12 months
Policy S13: Protecting the Historic environment	Land and premises designated as a Heritage Asset.	12 months
Policy DM8: Heritage Assets	Land and premises designated as a Heritage Asset.	12 months
Policy DM13: Community and Cultural Facilities	Land and premises in, or most recently in community or cultural use	18 months

Documented marketing of sites in the various uses identified in Table 1 will assist applicants in satisfying the requirements of the associated policies. It should be recognised that all other relevant planning policies to the proposal will be considered in the determination of the application.

## 2. Marketing information required from applicants

A marketing report should be submitted with the planning application. This should set out the details of the marketing that has been undertaken and demonstrate that there is no market demand for the premises in their current use or any use detailed in Table 1. This exercise should take account of the following points:

- a. Vacant or under-used premises or sites should be continuously marketed under their existing use, or a use in the same category, for a minimum period as set out in Table 1. The marketing period must have ended on a date no more than nine months before the date the planning application was submitted. In some cases, a longer period of marketing may be required in order to provide sufficient evidence that demand is lacking. The advice of the council should be sought prior to the commencement of any marketing campaign to ascertain the period and extent of marketing required.
- b. Where premises are in poor condition or have been partially demolished, the site should also be marketed for the potential redevelopment to reflect the existing use, or for equivalent uses within the relevant category (subject to the policy requirements of the Local Plan).
- c. The marketing should target potential occupiers with a variety of means. Dated copies of all sales literature, and in the case of marketing boards, dated photographs, will be required in the marketing report in order to demonstrate a sustained marketing effort. As a minimum, the following measures should be used:
  - Property details made available through a minimum of one local, professionally accredited commercial agent with a specialism in the relevant type of use. The property details (particulars) should as a minimum detail:
    - i. The type and size of the property/site;

- ii. Address and location information; and
    - iii. Leasehold rent and/or freehold sale.
  - A copy of the dated letter of instruction to the commercial agent and dated copies of the agent's property details should be included in the marketing report.
  - On-site/premises marketing boards (unless within a Conservation Area), of an appropriate quality, size, scale, location and number, in place throughout the period in which the property is being marketed.
  - Web-based marketing through a prominent location on the appointed commercial agent's website and other relevant search engines, such as Estates Gazette Interactive at [www.egi.co.uk](http://www.egi.co.uk). Depending on the type of premises being marketed, marketing through the website of a national estate agent may also be required.
  - Advertising covering at least the minimum required period as shown in Table 1, within relevant publications, such as the Estates Gazette, local press, appropriate trade magazines/journals and trade websites, and any publications produced by local business networks and support agencies.
- d. The premises and/or site should be marketed at a price and associated terms that are commensurate with market values for the existing use, based on evidence from recent and comparable transactions and deals. Where possible, at least three examples should be provided of completed transactions involving a similar site or premises and similar terms within the local area, preferably within the last twelve months, or written evidence from an independent qualified valuer on the market values in the local area. All information about price and terms should be provided in a format that enables easy comparison, using equivalent and comparable expressions of price per unit of floorspace. Where the price changed during the period of the marketing campaign, the reasons for this should be recorded and included in the marketing report.
- e. Where premises are marketed for lease, the length of lease offered should not be unduly restrictive and should include the potential for a short-term lease in appropriate cases. Details of the lease terms offered should be included in the marketing report, along with any changes made to the terms offered during the period of the marketing campaign and the reasons for this.
- f. The marketing exercise should reflect the existing use of the premises or business in its entirety, and not to parts of it. For example, the buildings should not be marketed separately to the accompanying car park.
- g. The marketing agent should keep a log of enquiries throughout the period of the marketing campaign. This should record the date and nature of the enquiry (such as the type of business enquiring), how the enquirer found out about the premises, whether the enquiry resulted in a site visit, and the reasons given for not progressing an offer on the premises. This log should be submitted as part of the marketing report.

- h. Where the flow of enquiries has been limited or is decreasing during the period of marketing, the marketing report should explain any measures taken to refresh the marketing campaign. It is reasonable that other equivalent uses within the same category (see Table 1) may also be explored. In circumstances where proposals do not fully meet relevant guidance it will be for developers to demonstrate through their marketing report that their marketing campaign was sufficiently wide-ranging, of adequate length that the asking price and terms were realistic and that specialists appropriate to the type of use were engaged.

Marketing the site as outlined above will assist the council in assessing the value of the land/premises in question, allowing them to evaluate whether there is a need for the existing use to be retained or whether the proposed reuse would deliver development that improves the economic, social and environmental conditions in the area.

It should not be assumed that any lack of potential market interest in the property for its existing use would automatically result in a favourable consideration of an application for non-compliant use.

In summary, the marketing statement should include all details and evidence of the steps taken to market the building/site as detailed above. If these requirements have not been met, the council may require additional marketing before the marketing can be considered acceptable.

Following receipt of the marketing report the council will review the content and compare this to evidence, potentially including but not limited to:

- Housing and Economic Development Needs Assessment
- Evidence published by the Local Enterprise Partnership (or equivalent organisation)
- Retail and Commercial Leisure Needs Assessment
- Authority Monitoring Report
- Accessing a third-party commercial property database (if available)

### **3. Financial viability information required from applicants**

This guidance relates only to the loss of the uses listed in Table 1, where the applicant is required to demonstrate that it would be unviable to continue with the site in its current use or one that is equivalent. It does not relate to demonstrating the viability or otherwise of new types of uses, when taking into account planning obligations such as, for example, affordable housing. The viability of new uses should, where necessary, be considered separately.

However, evidence of existing or equivalent alternative uses being unviable will inform the existing land value and may therefore be material in considering the viability of any new use.

The council will therefore require a financial viability appraisal that clearly demonstrates that the retention of the site (in full or in part) for its current use, or one that is equivalent, is not financially viable. It is important to note that the council will appoint a third party, at the cost of the applicant, to assess the evidence submitted as necessary.

The financial viability appraisal should include (but is not limited to) the following information:

- a) A valuation of the site in its existing use (ignoring the 'hope value' of alternative uses). The council may seek an independent valuation of the site, with the cost to be met by the applicant;
- b) For commercial community facilities, at least the last three years of accounts for the business;
- c) The total cost of development or redevelopment of the site for equivalent uses within the relevant category set out in Table 1;
- d) Information/evidence to support rents, sales values, capital values and rental yields adopted for the appraisal;
- e) Sensitivity testing to support the robustness of the report's conclusions against changing market conditions; and
- f) Evidence to illustrate that it would not be economically viable to retain the building or site for its existing or any other equivalent use falling within the same category as set out in Table 1 above.
- g) Wherever feasible, the viability appraisal should be carried out while the site is still in operation.

The council will require evidence that demonstrates that the business or facility has been operated positively. Proposals for loss must not be based solely on the needs of the current owner/tenant or their chosen business model. Applicants will need to look at the full range of potential uses or ways of operating a business or facility within its existing use category or other use categories that would be suitable in policy terms, to demonstrate that it is not workable in the long term. This includes the potential of the site for additional complementary developments that could make the business more viable.

The viability appraisal should, where relevant, include consideration of the potential for grant funding from public or charitable bodies to support uses on the site that are appropriate in policy terms.

#### **4. Evidence of need (community and cultural uses)**

Developers must carry out an assessment of the needs of the local community for community or cultural facilities to show that the existing premises is no longer needed for the community or cultural use, and whether adequate alternative provision is available in the area to meet the needs of residents, workers and visitors.

Any alternative facilities proposed as meeting the need must be accessible, inclusive and available without causing unreasonable reduction or shortfall in the local service provision.

The presence of another facility within the same category in the vicinity will not in itself be enough to meet this requirement; it must be demonstrated that the alternative facility caters, or can be reasonably expected to cater, for the same community need as that served by the facility whose loss is proposed.

If alternative facilities as described above are not proposed, the council will also require clear evidence that the facility is under-used, in terms of the number of people using it relative to its size and facilities, and in terms of the frequency and intensity of its use.

Furthermore, evidence will be required that it has seen a significant decline in its use over a sustained period. This will however be considered against any removal or diminution of facilities or services during this same period which may itself have caused the fall in its use.

## Appendix 5 - Parking Standards

### Introduction

This parking appendix sets out the vehicle parking standards that will apply to new development in the borough. It sets out the off-street vehicle parking standards that will apply to new developments. This Appendix should be read in conjunction with Policy S18 – Transport.

National Planning Policy Framework (NPPF 2021) makes clear that if setting local parking standards for residential and non-residential development, policies should take into account:

- a) the accessibility of the development;
- b) the type, mix and use of development;
- c) the availability of and opportunities for public transport;
- d) local car ownership levels; and
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

In light of the above, there are likely to be situations where less parking than the minimum standards are appropriate, specifically in Town Centre locations or where there are opportunities to access public transport by multiple modes (e.g., rail and bus).

The vehicle parking standards in this Appendix apply to all developments for the provision of one or more residential units (gross) and all developments that result in the creation of non-residential floorspace. If a planning application for extensions / alterations (residential and non-residential) involves a significant increase in area then the impact of the development on parking will be a material consideration and additional parking spaces may be sought to ensure that a suitable level of parking provision is made.

Where mixed use, residential and commercial developments are proposed, the parking requirements for each element should be calculated individually. However, consideration should be given to how parking spaces can be shared between uses, particularly the non-residential uses are likely to attract the need for parking during the day. Applicants will be required to demonstrate how these shared spaces will be managed to ensure that the needs of all uses on the site will be met, for example by preparing a parking strategy.

### Residential Development parking

It is important that new developments provide adequate parking provision so as not to increase parking on roads and increased congestion on public roads. Emphasis remains on promoting sustainable modes of travel and increasing active and public travel mode choice. Where greater access to amenity, public transport and active transport modes exist this enables residents to walk to access a lot of their daily needs.

Epsom Town Centre provides a good level of amenity and choice of public transport modes. Vehicle provision reflects the associated provision for vehicular parking due to the higher accessibility to amenity in this location.

Car parking spaces are based on maximum provision that development should provide, however reduced or even nil provision (than that listed in the table) will be appropriate in support of the most efficient use of land particularly where there is a good level of access to



public transport and amenity such as Epsom Town Centre. Any development providing nil vehicle parking provision is expected to provide more than the minimum standards for cycle parking as set out in the cycle parking table below.

**2. Parking Standards**

Size of dwelling (gross)	Maximum Car Parking Requirements				Minimum Cycle Parking Requirement		Minimum Requirement for Electric Vehicles
	Epsom Town Centre Long stay (resident)	Principal Movement Corridors and transport hubs beyond Epsom Town as defined on the policies map (resident)	All other areas (resident)	Short stay (visitor)	Long stay (resident)	Short stay (visitor)	
1 bed dwelling	1 space per dwelling	1 space per dwelling	1 space per dwelling	1 space per 5 dwellings	1 space per dwelling	Visitor cycle spaces will be expected at 10% of the long stay cycle spaces in developments of 5 units or more.	All new residential development must provide external wall-mounted electric vehicle charging (EVC) points or cable route for each dwelling where there is an associated parking space.  For dwellings served by parking courts, an
2 bed dwelling	1 space per dwelling	1 space per dwelling	2 spaces per dwelling	1 space per 5 dwellings	1 space per dwelling		
3 bed dwelling	1 space per dwelling	2 spaces per dwelling	2 spaces per dwelling	1 space per 5 dwellings	2 spaces per dwelling		
4+ bed dwelling	1 space per dwelling	2 spaces per dwelling	3 spaces per dwelling	1 space per 5 dwellings	2 spaces per dwelling		

						<p>EVC point must be provided equivalent to the number of dwellings proposed or where there are more dwellings than associated parking spaces proposed, EVC points must be provided for the total number of parking spaces for the development (whichever is the greater).</p> <p>At least 10% of visitor parking provision related to the development should be served by electric vehicle charging point on a public network.</p>
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Short stay (visitor) car parking standard – where the number of dwellings proposed is not a multiple of 5, provision will be rounded up. For example, for a proposal of 9 homes, 2 short stay visitor car parking spaces is the maximum requirement. However, provision is not required for proposals of less than 5 homes, but is encouraged where it is possible to incorporate into the development.

Short stay (visitor) cycle parking requirement – Visitor cycle spaces will be expected at 10% of the long stay spaces in developments of 5 units or more. Where the number of long stay resident spaces is not a multiple of 10, provision will be rounded up when the proportion is equal to or greater than .5, and rounded down when less than .5. For example, for a proposal of 12 2/3 bed homes, 24 long stay cycle spaces would be required, and therefore in this instance 2 short stay visitor spaces should be provided to serve the development.

Motorcycle parking – development proposals should provide motorcycle parking where possible, particularly where the proposed development consists wholly or in part of flats (i.e. where private garages are not available for parking motorcycles). The amount to be provided will be considered on a case by case basis.

<b>Older People's Housing</b>	
<b>Development</b>	<b>Requirement</b>
<p>Sheltered Housing</p> <p>This type of housing is diverse, and ranges from retirement living homes with few shared facilities which are managed and maintained by staff living off site to homes with full time onsite managers and varying degrees of personal care as required. These types of housing will attract people with a wide demographic and health profile with variable car ownership levels.</p>	<p>Given the broad range of accommodation available within this type of housing and the resulting variability of parking requirements, parking will be considered on a site by site basis. A full assessment of likely parking need should be provided with a development proposal (including information about number of employees, expected visitor patterns and type of parking needed).</p> <p>As a starting point, it is likely that retirement homes will need to provide one parking space per home subject to location and accessibility by public transport, with additional space for visitors and staff. Where the type of housing involves more care and less likely travelling by car of residents, the amount of parking likely to be needed by residents may be less, however, more parking for staff may be required. Consideration should be given to the provision and allocation of disabled parking, recognising that a higher proportionate may be appropriate than the standard for dwelling houses.</p> <p>Cycle parking for long and short stay cycling (particularly for staff and visitors) and storage and charging provision for mobility vehicles, should be included where appropriate.</p> <p>20% of available spaces to be fitted with an electric vehicle charging point with a specification exceeding that defined in the</p>

	<p>Surrey County Council Electric Vehicle Charging Requirements (as amended)</p> <p>A further 20% of available spaces to be provided with power supply to provide additional electric vehicle charging point with a specification exceeding that defined in the Surrey County Council Electric Vehicle Charging Requirements (as amended)</p>
<p><b>Nursing and Rest Homes</b></p> <p>Residents of this type of housing will receive a high degree of support and care. This would include specialist care homes, for example those catering particularly for dementia care.</p>	<p>Parking will be considered on a site by site basis. A full assessment of likely parking need should be provided with a development proposal (including information about number of employees, expected visitor patterns and type of parking needed).</p> <p>The amount of parking needed will depend on the level of care, whether the home is catering for a particular condition (for example, specialist dementia care), the location (for example, rural) and accessibility by public transport. This type of housing is likely to require less parking than 'sheltered housing' as above for residents, but more parking for staff, visitors and visiting medical staff (including emergency services).</p> <p>Consideration should be given to the provision and allocation of disabled parking, recognising that a higher proportion may be appropriate than the standard for dwelling houses.</p>

	<p>Cycle parking for long and short stay cycling (particularly for staff and visitors) and storage and charging provision for mobility vehicles, should be included where appropriate.</p> <p>20% of available spaces to be fitted with an electric vehicle charging point with a specification exceeding that defined in the Surrey County Council Electric Vehicle Charging Requirements (as amended)</p> <p>A further 20% of available spaces to be provided with power supply to provide additional electric vehicle charging points with a specification exceeding that defined in the Surrey County Council Electric Vehicle Charging Requirements (as amended)</p>
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**Caravans (including mobile home parks, Traveller pitches and Travelling Showpeople plots)**

<b>Development</b>	<b>Minimum Parking requirement</b>
<b>Mobile home parks (C3 land use)</b>	Parking provision should be made in accordance with the requirements for dwelling houses.
<b>Traveller pitches</b> (all pitches occupied by ethnic Travellers, regardless of meeting the planning definition as set out in Planning Policy for Traveller Sites).	<p>Parking provision should broadly follow the requirement for dwelling houses, however, given the tendency for the Traveller community to own vehicles for domestic and business use, higher than average levels of provision may be needed (although note excessive parking will be discouraged). Resident parking should be provided for, on individual pitches.</p> <p>Parking spaces must be a minimum of 2.4 x 4.8 metres, but where possible, provision should acknowledge the likelihood of larger cars and light vans on site, and provide some spaces at 2.4 x 5.5 metres in size.</p> <p>Visitor parking is an important consideration for Traveller pitches. Some visitor parking should be provided, ensuring that each pitch can accommodate at least one vehicle parking space for visitors, and if not, separate visitor parking within the overall site is provided. Separate parking areas should be situated in an area in good sight of the residents. Provision of visitor parking should particularly be the case where there is the potential risk that parking could overflow from the site and have a detrimental impact on the local highway network.</p>

	<p>Visitors sometimes bring touring caravans to a site for a few days at a time to attend a family event. However, Traveller accommodation is generally conditioned for a specific number of caravans, and visitors bringing touring caravans onto site could potentially contravene the conditions of the planning permission.</p> <p>Applicants seeking permission for Traveller accommodation should consider their likely visitor needs, and whether a planning condition specifying the number of days the site can be occupied by more than the allowed number of caravans (which permits visitors and allows attendance at family or community events) may be an appropriate mechanism (in accordance with Planning Policy for Traveller Sites (2015) para. 28).</p>
<p><b>Travelling Showpeople plots</b> (all plots occupied by Travelling Showpeople, regardless of meeting the planning definition as set out in Planning Policy for Traveller Sites).</p>	<p>Travelling Showpeople plots are generally larger than Traveller pitches to accommodate the storage of equipment. Proposals should broadly follow the parking requirement for dwelling houses.</p> <p>Parking spaces for the residential use must be a minimum of 2.4 x 4.8 metres, but where possible, provision should acknowledge the likelihood of larger cars and light vans on site, and provide some spaces at 2.4 x 5.5 metres in size. The provision of space for the storage of equipment is a separate issue to general parking, and a separate planning consideration.</p> <p>Some visitor parking should be provided, ensuring that each plot can accommodate at least one parking space for visitors, and if not, separate visitor parking within the overall site is provided. Separate parking areas may present security considerations for residents in some cases and should therefore be situated in an area in good sight of the residents. Provision of visitor parking should particularly be the case where there is the potential risk that parking could overflow from the site and have a detrimental impact on the local highway network.</p>

### Other forms of development parking

All other forms of development should adhere to the guidelines set out in [Surrey County Council's Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development](#) (November 2021) (as amended).

### 3. Size of parking spaces

The table below details the standard parking space size requirements for specific types of vehicles. These should be used as basic minimum reference values but different layouts such as parallel, herringbone and in-line, will have slightly different overall space requirements.

In addition, sufficient space for turning facilities on site to allow vehicles to enter and leave in a forward gear will be encouraged. Where vehicles reversing from or onto the highway would give rise to local highway safety issues, on-site turning space will be compulsory.

<b>Minimum parking space requirements for typical vehicles</b>	
<b>Type of Vehicle</b>	<b>Size (metres)</b>
Powered Two Wheelers	1.5 x 2.5
Car	2.4 x 4.8
Light vans	2.4 x 5.5
Rigid vehicles	3.5 x 14
Articulated vehicles	3.5 x 18.5
Coaches (60 seats)	3.5 x 14

### 4. Size of garages

A single garage/car port should measure a minimum of 3m in width by 6m in length internally and a double garage/car port should measure a minimum of 6m by 6m internally. This will allow room for a car to be parked and still allow space for access down the side of the vehicle. The length is to allow room for storage, particularly of cycles. A garage meeting these size requirements will count as one car parking space, and two bicycle spaces, subject to any exceptions described in this document.

A reduced size of garage/car port is unlikely to count as a vehicle parking space as it is unlikely to provide sufficient space for a vehicle and/or some storage.

This does not apply to car ports that cannot easily be used for storage. Car ports can assist with the design of hard landscaped car parks, and also encourage people to use the parking spaces, to help avoid frosts, or keep cars in the shade.



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# **Policies Map** **Draft** **Local Plan** **2022-2040**

(Regulation 18)

## **Consultation**

1 February - 15 March 2023

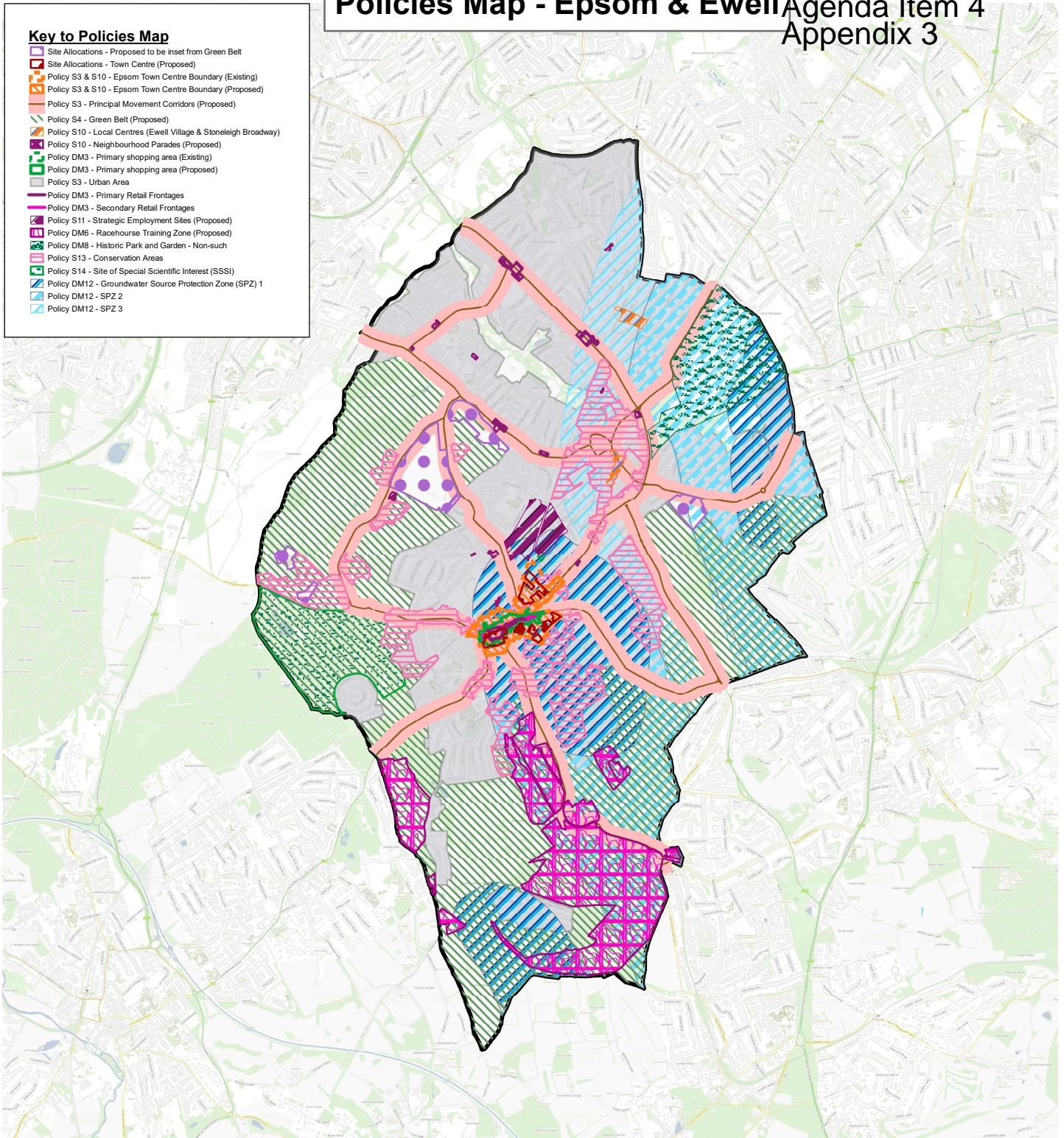


# Policies Map - Epsom & Ewell

Agenda Item 4  
Appendix 3

## Key to Policies Map

-  Site Allocations - Proposed to be inset from Green Belt
-  Site Allocations - Town Centre (Proposed)
-  Policy S3 & S10 - Epsom Town Centre Boundary (Existing)
-  Policy S3 & S10 - Epsom Town Centre Boundary (Proposed)
-  Policy S3 - Principal Movement Corridors (Proposed)
-  Policy S4 - Green Belt (Proposed)
-  Policy S10 - Local Centres (Ewell Village & Stoneleigh Broadway)
-  Policy S10 - Neighbourhood Parades (Proposed)
-  Policy DM3 - Primary shopping area (Existing)
-  Policy DM3 - Primary shopping area (Proposed)
-  Policy S3 - Urban Area
-  Policy DM3 - Primary Retail Frontages
-  Policy DM3 - Secondary Retail Frontages
-  Policy S11 - Strategic Employment Sites (Proposed)
-  Policy DM6 - Racecourse Training Zone (Proposed)
-  Policy DM8 - Historic Park and Garden - Non-such
-  Policy S13 - Conservation Areas
-  Policy S14 - Site of Special Scientific Interest (SSSI)
-  Policy DM12 - Groundwater Source Protection Zone (SPZ) 1
-  Policy DM12 - SPZ 2
-  Policy DM12 - SPZ 3














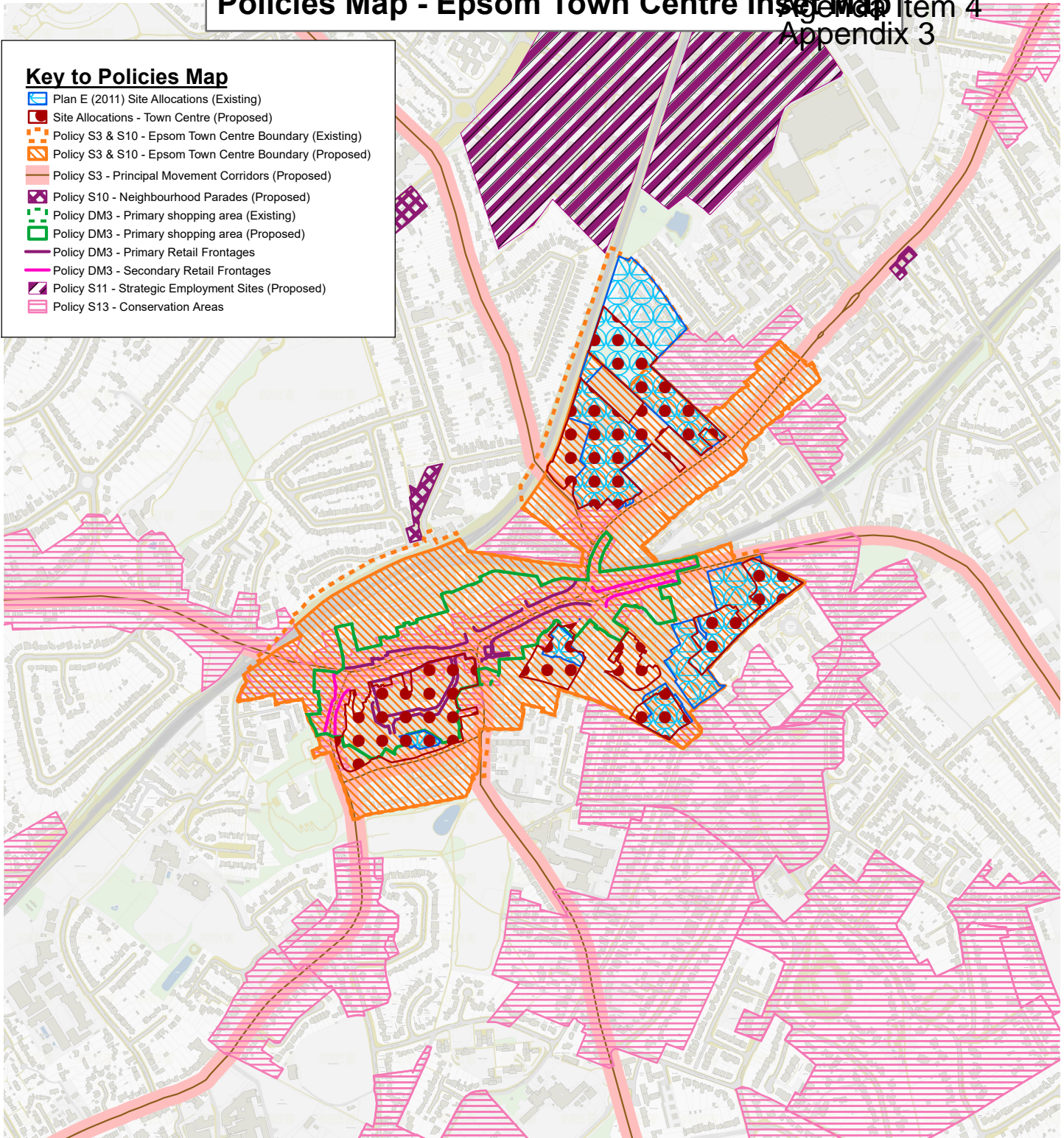


# Policies Map - Epsom Town Centre Inset Map

Set Map Item 4  
Appendix 3

## Key to Policies Map

-  Plan E (2011) Site Allocations (Existing)
-  Site Allocations - Town Centre (Proposed)
-  Policy S3 & S10 - Epsom Town Centre Boundary (Existing)
-  Policy S3 & S10 - Epsom Town Centre Boundary (Proposed)
-  Policy S3 - Principal Movement Corridors (Proposed)
-  Policy S10 - Neighbourhood Parades (Proposed)
-  Policy DM3 - Primary shopping area (Existing)
-  Policy DM3 - Primary shopping area (Proposed)
-  Policy DM3 - Primary Retail Frontages
-  Policy DM3 - Secondary Retail Frontages
-  Policy S11 - Strategic Employment Sites (Proposed)
-  Policy S13 - Conservation Areas



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



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# Sustainability Appraisal (SA) of the Epsom and Ewell Local Plan

## Interim SA Report Non-technical Summary

January 2023



**Prepared for:**

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# Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Epsom and Ewell Local Plan. Once adopted, the Local Plan will set the strategy for growth and change for the borough up to 2040, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.

A central requirement of the SA process is publication of an SA Report for consultation alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives” in order to inform the consultation and plan finalisation. The Council is currently consulting under Regulation 18 of the Local Planning Regulations, and so an ‘Interim’ SA Report is published alongside. This is the non-technical summary, and is structured as follows:

- Part 1 - presents an appraisal of reasonable alternatives; and
- Part 2 - presents an appraisal of the Draft Local Plan (as a whole).

## Part 1: Reasonable alternatives

The aim of Part 1 is three-fold:

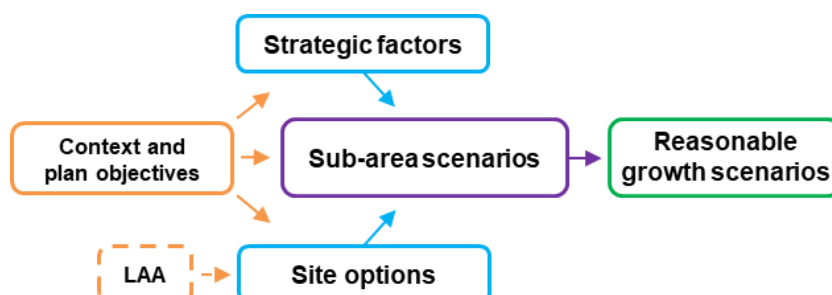
- 1) Explain reasons for selecting reasonable alternatives;
- 2) Present an appraisal of reasonable alternatives;
- 3) Present the Council's response to the appraisal, i.e. reasons for supporting the preferred option.

### Defining reasonable alternatives

Section 4 of the main report explains a focus on reasonable alternatives in the form of ‘**growth scenarios**’, defined as alternative approaches to the allocation of land with a view to providing for objectively assessed development needs, as far as possible, and supporting the achievement of wider plan objectives. Growth scenarios essentially amount to alternative local plan key diagrams.

Section 5 of the main report explains a process that led to the definition of growth scenarios for appraisal. Figure A presents a summary. A key step involved identifying growth scenarios for a series of sub-areas (which might alternatively be thought of as different broad categories of housing land supply), which could then be combined to arrive at reasonable alternative growth scenarios for the borough / local plan as a whole.

Figure A: Defining reasonable alternative growth scenarios



Sub area scenarios are as follows:

- **Town centre** – a town centre masterplan is in preparation, following an initial consultation in 2022. There are four key ‘opportunity areas’, and each is associated with a range of issues and options. However, for the purposes of defining growth scenarios, it is judged reasonable to explore the strategic choice is between: **A)** ~860 homes in total (i.e. across the four opportunity areas); or **B)** 20% more homes via higher densities.
- **Wider urban area** – the process of selecting sites for allocation has been led by the Council through the Land Availability Assessment (LAA, 2022).<sup>1</sup> Again, a key choice is judged to be in respect of density, specifically: **A)** ~830 homes in total; or **B)** 20% more homes via higher densities. N.B. there is also a distinction between two sub-categories, which relate to the level of accessibility / transport connectivity, as discussed in Section 5.4.

<sup>1</sup> Only sites that will deliver a net gain of 25+ homes are formally ‘allocated’, in that they are assigned a policy within the local plan. Smaller sites are simply listed in the local plan, with further information presented in the LAA. All site options within the wider urban area will deliver a net gain of fewer than 25 homes (such that none of the sites are formally ‘allocated’ by the plan).



- **Longmead and Kiln Lane Industrial Estates** – the question of whether to maintain existing industrial uses, or alternatively support a degree of mixed-use redevelopment (to include consolidated and intensified industrial uses), at these two adjacent industrial estates has been explored in some detail over recent years, including: through: the Issues and Options [consultation](#) (2017); a capacity [study](#) completed in 2018; an economic growth [strategy](#) (2020, plus 2021 addendum); a study completed by the Coast to Capital Local Enterprise Partnership (LEP, 2022); and a Housing and Economic Development Needs Assessment (HEDNA, 2022).

In light of all the evidence, the view at the current time is that there is no reasonable growth scenario involving housing supply from the industrial estates (within the plan period). It is recognised that the industrial estates benefit from very good proximity to Epsom town centre (to the south; also Ewell West Station to the north), and that the effect of delivering new housing here would be to reduce pressure on the Green Belt (discussed below), but there is a clear need to avoid impacting on the economic functioning of the industrial estates, and there are practical challenges to effective mixed use redevelopment / intensification. It could be that further work serves to identify some deliverable or developable housing supply (see NPPF [paragraph 68](#)), but no such supply can be identified at the current time, such that any reliance placed on supply from the industrial estates would risk 'setting the plan up to fail'. Specifically, there would be a risk of housing supply in practice dropping below what the plan commits to delivering ('the housing requirement'), which would lead to a risk of punitive measures.<sup>2</sup>

- **Previously developed land (PDL) in the Green Belt** – there is only one available site, which is Land at West Park Hospital, to the west of Epsom. West Park was one of the three hospital cluster sites allocated within the Epsom and Ewell Core Strategy (2007), and redevelopment has mostly come forward as planned. The current proposal is to deliver 150 homes on two parts of the site that still comprise NHS buildings, which are underused and judged by the NHS to be surplus to needs. The effect will be to reduce pressure on greenfield land within the Green Belt, plus it is important to note all developed land in this area (i.e. the former hospital site as a whole, also other nearby former hospital sites) may be removed ('inset') from the Green Belt prior to plan finalisation (subject to further investigation). There is not considered to be a significant choice in respect of development density (mindful of heritage constraint, namely the Epsom Hospitals Cluster Conservation Area), and so the overall conclusion is that there is only one reasonable growth scenario for 'PDL in the Green Belt'.
- **Green Belt** – can only be released for development through local plan in exceptional circumstances, and the importance of protecting the Green Belt is emphasised by the Government through the current [consultation on Levelling-up and Regeneration Bill: reforms to national planning policy](#). However, there are reasons to suggest that exceptional circumstances may exist in this case. A primary consideration is Local Housing Need (LHN), which is 576 dwellings per annum (dpa). Also, affordable housing needs are extremely high, with the Housing and Economic Development Needs Assessment (HEDNA, 2022) identifying a need for 652 affordable homes per annum (the true figure may be lower, but any figure for affordable housing need must be considered in the context of extremely low supply, with 12 affordable homes delivered over the two most recent [monitoring](#) years).

When viewed in the context of supply from non-Green Belt sources totalling *at most* 206 dpa,<sup>3</sup> high housing needs serves as a reason to at least explore the possibility of exceptional circumstances. As part of this, it is important to recall that the effects of not meeting housing needs are wide-ranging (e.g. relating to commuting / road traffic, business decision-making, investment, productivity, inequality, health and meeting the needs of specific sectors of the population, including families). Also, housing growth can bring benefits to local communities ('planning gain') including by delivering or facilitating delivery of new and upgraded infrastructure.

In this light, the question of Green Belt release is a key issue for the local plan. There is the question of whether to release any Green Belt at all, which is given considerable emphasis within the NPPF.<sup>4</sup> Also, if the decision is taken to release Green Belt (in light of demonstrable exceptional circumstances), then there is a clear need to take steps to minimise harm to the functioning of the Green Belt as far as possible, mindful of the five purposes of the Green Belt set out at [paragraph 138](#) of the NPPF.

<sup>2</sup> i.e. the 'presumption in favour of sustainable development' (NPPF paragraph 11), which can also be thought of as a 'tilted balance' in favour of housing delivery. This was a factor at a notable recent planning appeal in respect of a 20 home scheme in the Green Belt, which was refused by the Council (ref. [20/00475/FUL](#)), but then allowed by a Planning Inspector at appeal (ref. [APP/P3610/W/21/3280881](#)). The borough's housing supply position, as measured against the committed target/requirement, is discussed at paragraphs 29 and 33. For example, the Inspector explains: "For the above reasons, and also in the context of the LPAs housing land supply and delivery position, I do not find that the site would be unsustainably located."

<sup>3</sup> Calculated as: A) town centre and wider urban area allocations (with the higher density scenario assumed); plus B) Green Belt PDL; plus C) commitments (new homes with a planning permission as of 31<sup>st</sup> March 2022); plus D) supply from windfall sites (i.e. sites that can be anticipated to come forward despite not being identified in the LAA). See further discussion below.

<sup>4</sup> Within the draft revised NPPF (December 2022), the primary change in respect of Green Belt policy is addition of the following statement within [Section 13](#): "Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period."

The LAA does not differentiate between the 23 available Green Belt site options, in terms of their suitability for release for development. However, on the basis of the analysis set out below, it is possible to identify a tentative sequential order of preference (N.B. this is a key step and, as such, views on this order of preference are sought through the current consultation, and further work will be undertaken to inform plan finalisation):

1. Hook Road Arena (~150 homes) – is Council-owned land and is located in close proximity (~800m) to Ewell West Station. Also, the part of the site proposed for housing (with the remainder of the site proposed for a new sports hub) is very well contained within the landscape, with only a small proportion of the site perimeter open to the wider countryside, and this part of the perimeter is well-contained by a mature field boundary.
2. Horton Farm and Chantilly Way (1,525 homes) – two adjacent sites for ~1,500 homes (Horton Farm) and ~25 homes (Chantilly Way). The combined site performs reasonably well in transport terms, including in terms of proximity / links to Epsom town centre (<2km), and there is limited environmental constraint to growth in this area. However, it is the scale of growth that serves as perhaps a primary argument in support of allocation. Urban expansion at this scale can give rise to wide-ranging opportunities over-and-above 'piecemeal' expansion and, in this case, there is the potential (N.B. work is ongoing) to realise opportunities including around housing mix, green infrastructure and meeting Gypsy and Traveller accommodation needs.

N.B. Hook Road Arena is in close proximity, such that there is an argument for considering all three sites in combination (with a view to comprehensive development so as to fully development-related opportunities). However, intervening land includes a conservation area (part of the Hospitals Cluster Conservation Area, which is discussed further below), a cemetery and a horse-riding centre for disabled people (Epsom RDA).

3. Land adjoining Ewell East Station (~350 homes) – there are some notable constraints here, including relating to existing use for sports pitches and sensitivities to the south; however, a key argument in favour of allocation relates to the proximity of Ewell East Station, which is adjacent. Also, there is the potential to deliver new local retail provision, which is understood to be needed in the local area. With regards to the sports pitches, there would be the potential to reprovide these at Hook Road Arena (discussed above).
4. Downs Farm (~650 homes) – performs similarly to the sites discussed above in terms of transport connectivity, with Epsom town centre comfortably under 2km distance, Epsom Downs Station under 1km walking distance (albeit the service is not as frequent as from Epsom (in particular) and Ewell East) and good access to the strategic road network. However, the land is subject to a higher degree of environmental and likely (subject to further work) Green Belt constraint. Different scales and configurations of growth can be envisaged, seeking to balance: A) a need to minimise impacts; with B) a desire to achieve comprehensive growth, with associated benefits, e.g. in terms of new and upgraded infrastructure. On balance, a ~650 home scheme is assumed, which is in line with the latest proposal from the site promotor.
5. SE of Epsom (550 homes) – a cluster of four LAA sites that, it is assumed (for the purposes of defining reasonable growth scenarios), would be delivered in combination, with a view to comprehensive growth. Epsom town centre is <2km distant, and Epsom Downs station ~1.5km walking distance from the eastern-most site, plus there is off-road cycle connectivity a good part of the way towards the town centre; however, the cluster is located between strategic road corridors (potentially with implications for bus connectivity). Landscape is a key constraint, with the land rising quite steeply towards Epsom Downs.
6. South of Manor Park (430 homes) – a cluster of four LAA sites that it is assumed (as above) would be delivered in combination, with a view to comprehensive growth. The cluster benefits from good proximity to Epsom town centre (<1.5km) and, in turn, Epsom Station, and there could be a degree of landscape capacity, given a flat topography and extensive tree cover. However, environmental constraint is overall high (at least in comparison to the sites discussed above). Epsom Common SSSI is adjacent, the Thames Downs Link long distance path passes through this area (linking Epsom Common to Horton Country Park) and there is a high density of mature field boundaries / tree belts (mostly with an area Tree Preservation Order designation). Also, and importantly, the land in question clearly relates closely to two components of the Epsom Hospitals Cluster Conservation Area (specifically West Park and the Manor), as well as the separation between the Hospitals Cluster and Epsom. The land was proposed as an extension to the conservation area by an [appraisal](#) completed in 2007, and this was subsequently implemented, although the extension is not shown on all mapping, and it is noted that the proposed extension related to the setting of a house - Hollywood Lodge - that was extensively fire damaged in 2015, and now appears to be in a state of ruin. Regardless, the land in question clearly has high historic environment value. Finally, it should be noted that the firm intention, under any scenario, would be to retain the allotments currently within the site.
7. Drift Bridge Farm (600 homes), Land NE of Reigate Rd (170 homes) and Langley Bottom Farm (130 homes) are three further sites that are judged to perform relatively poorly, in comparison to those discussed above.

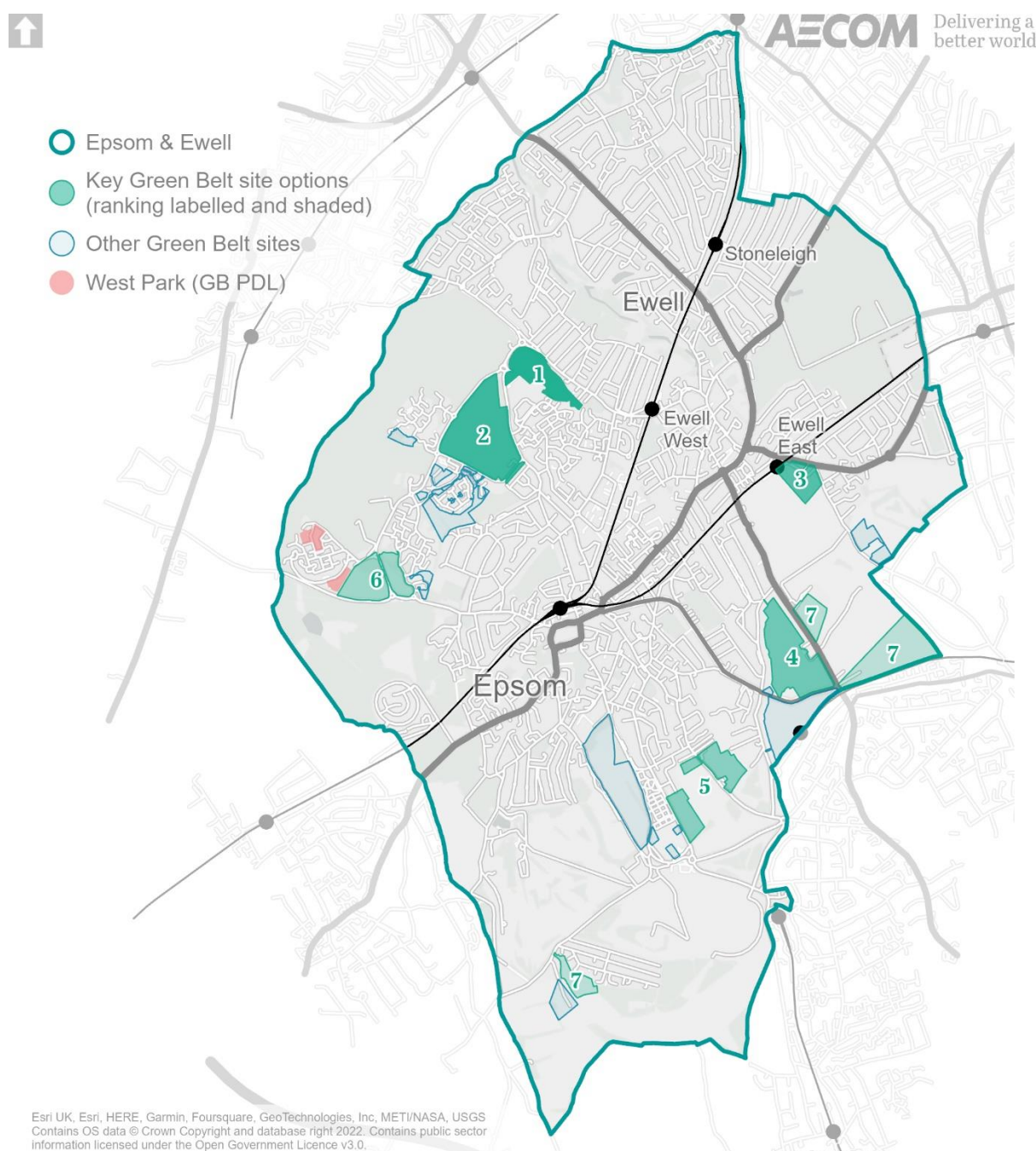
- a. Drift Bridge Farm may have a degree of capacity in landscape terms, given existing built form on two sides, and is subject to limited environmental constraint in some respects. However, the extensive northern boundary is open to the wider countryside (the gap between Epsom and Banstead), and the field boundaries that might be drawn upon to contain development appear relatively weak, such that there would be a concern regarding problematic development 'creep' downhill towards Epsom over time. Banstead Station is nearby 'as the crow flies' but is >2km distant by current walking routes (assuming new access cannot be achieved, which would clearly be challenging and potentially problematic). The existing road access, at the western extent of the site, is also potentially problematic, given proximity of the A240/A2022 junction and a railway bridge. The site relates more closely to Banstead than Epsom.
- b. Land NE of Reigate Rd (A420) comprises a light industrial area, a plant nursery and a composting facility, such that there is considerable existing built form. However, releasing land from the Green Belt would risk greatly compromising the integrity of the landscape / Green Belt gap between Epsom and Banstead, including given limited potential to define a new defensible Green Belt boundary (i.e. the potential for further development creep over time can be envisaged). A development of 15 homes adjacent to the north was delivered in 2015, but this was with the specific intention of enabling the setting up of [Priest Hill Nature Reserve](#) (which does assist with providing some containment within the landscape; also, there is a significant surface water flood channel between the site and North Looe Estate, to the east). Further considerations are: the value of existing uses onsite; the lack of bus services along the A240 (this is also an issue for Drift Bridge farm and Downs Farm); and pedestrian / cycle connectivity and road safety along the A420 (it is noted that an offroad cycle route begins ~700m to the north, which might feasibly be extended).
- c. Langley Bottom Farm is adjacent to the south of Langley Vale, which is a small village developed as a new settlement in the early 20th Century. The village lacks a centre, and overall has limited facilities, but there is a primary school, a good-sized village hall and some limited retail provision at a petrol station (a small shop / news agent recently closed). There is also excellent access to high quality countryside, including [Langley Vale Centenary Wood](#). The site in question comprises a single field to the south of the village, and is the only feasible location for a significant extension to the village, with a view to delivering new community infrastructure and supporting wider place-making. Also, the possibility of a new defensible Green Belt boundary can be envisaged, given woodland to the east and Ebbisham Lane to the south, which marks the northern extent of the Centenary Wood, and where there is a cluster of farm buildings with planning permission for 20 home redevelopment (ref. [20/00475/FUL](#)). However, the site is clearly constrained in landscape terms, as it comprises the northern extent of the Area of Great Landscape Value (AGLV) designation within the borough, which is a Surrey-wide designation that essentially comprises an extension of the Surrey Hill AONB (and it is noted that a [review](#) of the AONB is currently underway, with a view to possible extension to include AGLV land). The land rises steeply from the south (from Ebbisham Lane towards the village) and is prominent within the landscape, including as viewed from two adjacent bridleways (one being Ebbisham Lane) and from Langley Vale Road (at least glimpsed views). The site is also adjacent to Epsom Downs Site of Nature Conservation Importance (SNCI, i.e. the primary local level biodiversity designation). Furthermore, and importantly, aside from environmental constraints, Langley Vale is very poorly connected in transport terms, in comparison to other locations under consideration that are closer to Epsom town centre and/or a rail station. There is only a limited bus service direct from Langley Vale to Epsom.

Other Green Belt sites – are available or, at least, were promoted as being available through the [call for sites](#) in 2022. However, all are judged to perform relatively poorly, at least in relative terms, i.e. in comparison to the sites discussed above. For example, land is available to the south of the town centre / east of Ashley Road / west of Chalk Lane, but this is steeply rising land with links to the racecourse, and there is a blanket TPO. Also, land is available to between two of the components of the former hospitals cluster (the Manor and Horton), but this land is mostly designated as an SNCI (Livingstone Park). Finally, it should be noted that AECOM and Council officers discussed the possibility of exploring the potential to allocate parcels of land over-and-above those that have been promoted as available, which would necessitate proactive work to engage with land-owners etc. However, no significant opportunities were identified. One parcel of land that is not subject to headline constraints is at the southwest extent of the borough, adjacent to Ashted, but land here is seemingly in use as a stud farm and is poorly connected in transport terms, particularly as direct access to the A24 is blocked by an area of wooded common land. The possibility of modest housing growth with access from the west might be envisaged, but there is a significant surface water flood channel along the western boundary of this land parcel (the headwaters of the Rye) plus the adjacent common land is a constraint.

All of the Green Belt site options discussed above are shown in Figure B. Within Figure B the sites are placed in a sequential order of preference (for allocation) in accordance with the discussion set out above.



Figure B: Green Belt site options ranked in order of preference (see preceding discussion)



The final step was then to **combine sub-area scenarios** into reasonable growth scenarios for the plan area / local plan as a whole. Five sub-areas are discussed above, and in summary:

- For two sub-areas (Green Belt PDL and the industrial estates) there is only one reasonable scenario.
- For two sub-areas (town centre and wider urban area) there are two reasonable growth scenarios.
- For one sub-area (Green Belt) there are many feasible scenarios, involving various combinations of sites, but the identified sequential order of preference assists with reducing the number of reasonable combinations.

At this point in the process, there is a need to recall the key strategic **context**, namely local housing need (LHN) of 576 dwellings per annum (dpa) and supply from commitments and windfall (defined above) totalling 1,600 homes, or 89 dpa. Also, as discussed, for the purposes of defining reasonable growth scenarios it is fair to assume 150 homes supply from Green Belt PDL (also nil homes from the industrial estates) under all growth scenarios. As such, the total supply that can be assumed as a 'constant' across all reasonable growth scenarios is 97 dpa.<sup>5</sup>

<sup>5</sup>  $(1,600+150)/18 = 97$  dpa

As such, the **residual figure** to be met through allocations within the town centre, wider urban area and the Green Belt is *at least* 479 dpa *if* the housing requirement is to be set at LHN -

N.B. this is an 'at least' figure because there is also a need to ensure that supply exceeds the housing requirement, as a 'buffer' to account for inevitably unforeseen delivery issues at the development management stage.

The **starting point** is a borough-wide growth scenario involving lowest growth across all three of the variable sub-areas, i.e. the lower density assumptions for both the town centre and wider urban area and nil Green Belt. Total supply would be 3,442, or 191 dpa (and housing requirement might be set 5 or 10% lower, to ensure a supply buffer). The effect would be export *at least* 7,000 homes unmet need to a highly constrained sub-region, where unmet housing need is already a major issue, and there is no strategic mechanism in place to address unmet need, such that there can be no confidence regarding where, when or even if unmet needs will be met.<sup>6</sup>

In this light, there is a strong argument to suggest that this scenario is 'unreasonable'. However, on the other hand, there is a need to consider the evolving national policy context in respect of the Green Belt, mindful of the Government's current [consultation](#) on *Levelling-up and Regeneration Bill: reforms to national planning policy*. As discussed, the primary proposed change to the NPPF in respect of Green Belt policy is addition of the following statement within Section 13: *"Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period."*

In this light, and on balance, it is reasonable to appraise (and consult upon) a growth scenario involving lowest growth across all three of the variable sub-areas. This is **reasonable growth scenario 1**.

The next port of call is then a scenario involving the higher density scenario at one or both of the urban sub-areas (town centre and the wider urban area). It is reasonable to just explore a single scenario involving higher density at both sub-areas (to minimise the total number of scenarios), which leads to a total supply of 215 dpa (although, to reiterate, the housing requirement would need to be lower). This is **reasonable growth scenario 2**.

Finally, there is a need to consider growth scenarios involving one or more Green Belt allocations, in addition to higher density across the urban area. It is reasonable to assume that higher urban density is a pre-requisite for greenfield Green Belt allocation, given NPPF paragraph 141: *"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development."*

There is a great number of feasible combinations of Green Belt allocations; however, for the purposes of defining growth scenarios it is reasonable to assume a sequential approach to allocation, i.e. the sequentially preferable site option identified above (Hook Road Arena) would be allocated first, followed by the next sequentially preferable site (Horton Farm / Chantilly Way) and so on. There is a need for caution, in respect of a sequential approach, because site options can often impact in combination – both positively and negatively – however, in this instance it is judged reasonable to assume a sequential approach to Green Belt allocation.

As discussed, the first port of call is Hook Road Arena. However, as this is a modest sized site, it is considered reasonable to assume that it would also be allocated in combination with (nearby) Horton Farm / Chantilly Way. Total supply would be 308 dpa. This is **reasonable growth scenario 3**. In turn, **reasonable growth scenario 4** would involve additional allocation of Land adjoining Ewell East Station (total supply 327 dpa); and **reasonable growth scenario 5** would then involve additional allocation of Downs Farm (total supply 363 dpa).

The next two sequentially preferable sites are then SE of Epsom cluster and South of Manor Park. Two scenarios might be defined involving additional allocation of each of these sites in turn; however, in order to minimise the number of scenarios for appraisal (and consultation) it is considered reasonable to only define a single scenario involving allocation of both sites. Total supply would be 418 dpa. This is **reasonable growth scenario 6**.

Assuming (for the sake of argument) a 10% supply buffer, leading to a housing requirement set at ~375 dpa, this scenario would involve generating around 3,600 homes unmet need, such that there is a clear strategic argument for exploring higher growth scenarios, i.e. scenarios involving further Green Belt release. However, the sites in contention for additional allocation (Drift Bridge Farm, Land NE of Reigate Rd and Langley Bottom Farm) all have very clear issues / drawbacks. There is also a need to consider in-combination impacts, notably in terms of traffic / road and junction capacity (particularly given a potential cluster of three closely related sites to the east of Epsom, also mindful of high car dependency at Langley Vale) and landscape / Green Belt (there would be a clear concern regarding the integrity of the landscape gap between Epsom and Banstead). Finally, there is a need to recall the evolving national policy context in respect of Green Belt, as discussed above.

<sup>6</sup> N.B. the Council has engaged with all neighbouring authorities directly, under the Duty to Cooperate, regarding the possibility of providing for unmet housing need from Epsom and Ewell, but all have replied saying that they are not able to do so.

In this light, and on balance, it is considered reasonable *not* to define a further higher growth scenario, i.e. a scenario involving a level of growth over-and-above reasonable growth scenario 6. It is important to recall that a central tenet of the local plan-making under the NPPF is the potential to set a housing requirement that balances housing need and wider issues and opportunities (with any unmet need generated then dealt with as necessary).

Therefore, there are **six reasonable growth scenarios**, which are shown across the table and maps below. Finally, as a methodological caveat, it is important to note that there is invariably a need to make simplifying assumptions in order to arrive at a manageable number of scenarios, given the aim of arriving at scenarios that reflect the objectives of the plan (such that they essentially comprise alternative key diagrams).<sup>7</sup> A key motto is that *“the phrase all reasonable alternatives does not equate to all conceivable alternatives”*<sup>8</sup> and there is clear precedent on the need for proportionality, in respect of the task of arriving at reasonable alternatives.

Table A: The reasonable alternative growth scenarios (with constant supply components greyed-out)

Supply component		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Commitments		1,041	1,041	1,041	1,041	1,041	1,041
Windfall		561	561	561	561	561	561
Town centre	Hook Rd car park and SGN	860	1070	1070	1070	1070	1070
	Town Hall cluster						
	Depot Rd and Upper High St						
	Ashley Centre						
Urban area	Corridors, stations, centres	830	1042	1042	1042	1042	1042
	Wider urban area						
Industrial estates		0	0	0	0	0	0
GB PDL	West Park	150	150	150	150	150	150
Green Belt	Horton Farm and Chantilly Way	0	0	1675	1675	1675	1675
	Ewell East	0	0	0	350	350	350
	Downs Farm	0	0	0	0	650	650
	S. of Manor Park and SE cluster	0	0	0	0	0	980
Total housing supply		3,442	3,864	5,539	5,889	6,539	7,519
Supply per annum*		191	215	308	327	363	418

\* It is important to recall that the housing requirement would need to be set a lower figure, to ensure a supply buffer.

In summary, the reasonable growth scenarios are:

- Scenario 1: Lowest growth (housing requirement set at ~170 dpa, leading to high unmet need)
- Scenario 2: Scenario 1 plus higher densities in the town centre and wider urban area
- Scenario 3: Scenario 2 plus allocation of Horton Farm and Chantilly Way
- Scenario 4: Scenario 3 plus allocation of Ewell East
- Scenario 5: Scenario 4 plus allocation of Downs Farm
- Scenario 6: Scenario 5 plus allocation of Land south of Manor Park and the SE Epsom cluster

<sup>7</sup> The legislative requirement (Environmental Assessment of Plans and Programmes Regulations, 2004) is to appraise and consult upon reasonable alternatives *“taking account of the objectives and geographical scope of the plan...”*

<sup>8</sup> See <https://www.aylesburyvaldc.gov.uk/sites/default/files/VALP/ALP%20Report.pdf#page=43>

Figure C: The reasonable alternative growth scenarios



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## Appraising reasonable alternatives

Having defined reasonable alternatives in the form of six growth scenarios, the next step is to appraise them under the 'SA framework', which essentially comprises a list of 13 sustainability topics. Further information on the appraisal 'scope' is set out within a stand-alone [Scoping Report](#) (2022)

The appraisal is presented below in the form of an appraisal 'matrix', comprising a column for each of the reasonable growth scenarios, and a heading for each of the 13 components of the SA framework. The appraisal matrix is followed by a supporting commentary.

Within each row of the appraisal matrix, the aim is to:

- 1) rank the scenarios in order of performance (with a star indicating best performing; "=" indicating scenarios performing broadly on a par; and "?" indicating an inability to reach a conclusion); and then
- 2) categorise the performance in terms of 'significant effects' using **red** / **amber** / **light green** / **green**.<sup>9</sup>

*Table B: Reasonable alternatives - summary appraisal findings*

Topic	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Accessibility	4	3	2	★1	2	2
Air quality	5	4	3	★1	★1	2
Biodiversity	3	2	★1	★1	★1	3
Climate change adaptation	=	=	=	=	=	=
Climate change mitigation	4	3	2	★1	3	3
Communities	=	=	=	=	=	=
Economy and employment	6	5	4	3	2	★1
Historic environment	3	3	★1	★1	2	4
Housing	6	5	4	3	2	★1
Land and soils	2	★1	★1	★1	★1	★1
Landscape	2	★1	★1	★1	3	4
Transport	4	3	2	★1	2	3
Water	?	?	?	?	?	?

<sup>9</sup> **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.



## Discussion

There are three immediate points to note.

- Scenarios 3 and 4 are shown to perform well under a relatively high number of topic headings, and to perform poorly under relatively few topic headings. This is an indication that these scenarios perform well overall, however, this conclusion cannot be taken from the appraisal with any certainty. This is because the appraisal is undertaken without any assumptions made regarding the degree of importance (or 'weight') that should be assigned to each topic heading in the decision-making process. In short, the intention is not for the scores in each column to be tallied-up in order to arrive at an overall score for each of the scenarios.
- Scenario 1 (low growth) is shown to perform relatively poorly under most topic headings, with the exception of 'Landscape (reflecting an understanding that Borough is associated with particular constraint in this respect). This reflects an assumption that Scenario 1 would generate the highest level of unmet housing need that, in turn, would need to be met elsewhere within a constrained sub-region. The locations where unmet need would be met are not known, but that in itself serves as a reason for proactively planning to meet the borough's housing needs as fully as possible through the local plan. High unmet need would lead to pressure for growth elsewhere at locations that could perform poorly in wide-ranging respects.
- All of the scenarios are associated with pros and cons, which is invariably the case when dealing with scenarios that are 'reasonable'. It is for the Council, as decision-maker (not SA), to weigh-up the pros and cons of each scenario, and reach a conclusion on which best represents sustainable development on balance.
- No differential effects – is the conclusion under two headings. These topic headings are considered less central to the appraisal, but that is not to say that there are not a range of issues to consider.
- Uncertain effects - is the conclusion under one heading reflecting a need for further evidence-gathering.

Having made these opening remarks, the following bullet points consider each of the topic headings in turn:

- **Accessibility** – to community infrastructure is a key issue for local plan-making. There is a need to deliver new and upgraded capacity, to the benefit of the new and existing communities. **Horton Farm** is supported, in this respect, on account of its scale, although more work is needed to confirm precisely what will be delivered. Engagement with the County Council to date has not confirmed the need for a primary school (declining birth rates over the >10 years is a factor), but schemes of this scale are typically able to provide land for a primary school if required. Furthermore, the site links well to existing local centres, with a high density to the west of Epsom (see [Figure 12.1](#) in the Scoping Report, SR), which is also a factor in support of **Hook Road Arena** (the B2200/B284 can be described as a strategic corridor). Also, and more generally, strategic growth to the west of Epsom will complement recent growth associated with the former hospitals cluster, with place-making opportunities that can be explored further prior to plan finalisation. With regards to Land adj. Ewell East Station (**Scenario 4**), this will deliver new retail provision to meet a local need. With regards to Downs Farm (**Scenario 5**), the current proposal is to provide land for a primary school, which is supported given the scale of proposed growth; however, there is no evidence to suggest that a new primary school is needed in the borough, even under a higher growth scenario akin to Scenario 5. Under **Scenario 6**, there is little reason to suggest any particular additional community infrastructure-related opportunity, and it could feasibly be the case that growth comes forward in somewhat piecemeal way (e.g. if the SE cluster proves not to be deliverable as a single, comprehensive scheme, given divided land ownership) that serves to increase pressure on existing community infrastructure capacity locally. With regards to the final two scenarios, **Scenario 2** is preferable to Scenario 1 as higher density development in the urban area will lead to opportunities to deliver new community infrastructure over-and-above lower density development, plus exporting unmet need is generally not supported given the possibility of unmet need ultimately being met in locations / in a way that is problematic, or sub-optimal, in terms of accessibility to community infrastructure.
- **Air quality** – is not a major issue locally, with just one designated air quality management area (AQMA), which is within Ewell (such that it is relatively distant from most of the Green Belt site options that are the primary variable across the growth scenarios). However, [Figure 2.2](#) of the SR does show another dataset, which shows that air quality is higher in rural West Surrey than in suburban East Surrey. The appraisal conclusions reflect two factors. Firstly, generating **unmet need** is problematic in transport terms and so, in turn, also for air quality. Also, some towns in the sub-region that might feasibly be a focus for unmet need are notably constrained in air quality terms. Secondly, the additional sites allocated under **Scenario 6** are less well-connected in transport terms, and so, in turn, are potentially problematic for air quality. Noise pollution is another consideration here, but it is not clear that any of the potential growth locations are significantly constrained in this respect (higher densities can give rise to challenges). Finally, it is noted that there is a primary school adjacent to Horton Farm, which is a 'sensitive receptor' that will require further consideration.

- **Biodiversity** – a high proportion of the borough's Green Belt is at least of local importance for biodiversity, plus nationally important Epsom Common SSSI is a key constraint. The appraisal reflects to key factors. Firstly, **unmet need** from East Surrey is potentially problematic for biodiversity, given a high level of constraint affecting west Surrey, including the internally important Thames Basin Heaths Special Area of Conservation (SAC). Secondly, under **Scenario 6** it is assumed that there would be a need to allocate Land south of Manor Park, which is adjacent to Epsom Common SSSI, and also subject to wider biodiversity constraint, with the land clearly contributing to connectivity between Epsom Common and Horton Country Park. All of the other Green Belt site options in question are also constrained by proximity to a locally designated SNCI to some extent, but this is most significantly the case for **Land adj. Ewell East Station**, which links very closely to Priest Hill SNCI. However, there is little reason to suggest that development would lead to major issues. Problematic recreational pressure is potentially the 'impact pathway' of greatest concern, but Priest Hill is managed as a nature reserve by Surrey Wildlife Trust (who will wish to comment through the consultation).
- **Climate change adaptation** – a key consideration for local plans is invariably **flood risk**, although there are also a wide range of other climate change adaptation / resilience considerations, including overheating risk. None of the Green Belt site options in question are constrained by fluvial (river) flood risk, and whilst **surface water flood** risk is much more widespread, it can typically be dealt with effectively at the development management stage. It seems unlikely that surface water flood risk would be a constraint to effective masterplanning at any of the Green Belt sites in question (Horton Farm is most constrained). Finally, with regards to the **urban area**, a small proportion of the proposed supply is associated with sites notably affected by either fluvial or significant surface water flood risk; however, intensifying the use of previously developed sites subject to a degree of flood risk is quite common practice nationally, given good potential to avoid or suitably mitigate flood risk through detailed measures, including building design. Having said this, there is a need for caution, when seeking to deliver new homes at sites that have historically been seen as suitable for uses with low vulnerability to flood risk (e.g. employment, car parking), mindful of climate change scenarios. **Higher density** redevelopment can feasibly make avoiding/mitigating flood risk more challenging, but this is uncertain. It is a detailed matter for further consideration through town centre masterplanning work.
- **Climate change mitigation** – it is challenging to differentiate between the scenarios with confidence, including because of a need to balance objectives around minimising per capita greenhouse gas emissions from both **transport** (which is a focus of discussion under other topic headings) and the **built environment**. The appraisal reflects three key factors. Firstly, **unmet need** is considered highly problematic in transport emissions, because there is a clear-cut 'transport' argument for meeting housing needs close to where they arise. Secondly, Land adj. Ewell East Station is supported from a perspective of minimising transport emissions. Thirdly, **strategic urban extensions** can give rise to a built environment decarbonisation opportunity over-and-above piecemeal urban extensions (all other things being equal). Specifically, this might be in terms of: A) achieving standards of building design that go beyond the requirements of Building Regulations (which are in the process of being tightened to the point of requiring a 'Future Homes Standard'); B) realising opportunities for heat networks through higher density mixed use development; and/or C) realising opportunities for decentralised power systems, linking supply (solar PV) and demand (heat pumps, EV charging) via use of battery storage and smart technologies, in order to minimise strain on the national grid. There is currently there is limited evidence to suggest that **Horton Farm** represents a *particular* opportunity, in respect of minimising per capita built environment emissions, but this is a matter that can be explored further through the consultation (all Green Belt site promoters are encouraged to submit evidence to enable differentiation between the options). It is noted that the current scheme proposal for **Downs Farm** does include densities up to 65 dpa, but there is little reason to assume that this higher density would be deemed appropriate in practice, were the site to be allocated. Finally, there is clear support for maximising **density** within the urban area, from both a transport and built environment greenhouse gas emissions perspective.
- **Communities** – this is an opportunity to discuss matters over-and-above the key matter of accessibility to community infrastructure, which is a focus of discussion above. With regards to **Horton Farm** and **Hook Road Arena**, the view is that there is a general opportunity to contribute to place-making to the northwest and west of Epsom, which is where recent housing growth has been focused, through the redevelopment of the former hospital sites. Hook Road Arena will deliver a new sports hub and, whilst further work is needed to confirm what Horton Farm will deliver and 'bring' to the local area, there can be confidence of a high-quality development that achieves 'planning gain'. As part of this, there will be a need to deliver strategic green infrastructure and, related to this, it is expected that the scheme will be comprehensive in the sense of 'completing' the expansion of Epsom in this direction (as far as Horton Country Park). A final consideration, in respect of these sites to the NW of Epsom, is that this part of the borough is associated with a degree of relative deprivation, at least in comparison to the rest of the borough (which is overall affluent; see [Figure 6.1](#) in the SR), serving to emphasise the need to realise opportunities for wider place-making and planning gain.

With regards to **Downs Farm**, it is more difficult to confidently predict development delivering significant benefits to the local community. The proposed greenspace – which would likely be necessary to make any scheme acceptable in Green Belt terms – is of note, but the existing community already appears to have quite good access to greenspace, including strategic greenspace. It is noted that work completed by the site promoters suggests a strategic green infrastructure opportunity around new accessible greenspace onsite serving as a ‘steppingstone’ between Epsom Common / Epsom Downs and Banstead Downs, but the significance of any benefit is not entirely clear. It is noted that the proposal is not to offer the extensive area of land to the south of the A2022 (which is in the same land ownership) as strategic greenspace. In this respect, there is also the need to note the possibility of creating / restoring chalk grassland in this area, noting what has been achieved at nearby Priest Hill Nature Reserve. It is also noted that the site is surrounded by existing properties on two sides, such that there will inevitably be a degree of impact to residential amenity.

With regards to the additional sites that, it is assumed, would be allocated under **Scenario 6**, there is again limited potential to confidently suggest that these options have particular merit, from a ‘communities’ perspective. Land to the south of Manor Park could potentially serve to complement adjacent recent growth locations (former hospital sites), and it is noted that the proposal under all scenarios is for a further ~150 homes to be delivered at the adjacent Manor Park hospital site; however, a preferable scenario, from a ‘communities’ perspective might involve limited housing growth aligned with delivery of new accessible green infrastructure, including with a view to enhancing links between Epsom Common and Horton Country Park.

In summary, there are clearly wide-ranging factors at play, but it is difficult to reach an overall conclusion.

- **Economy and employment** – the proposal at Downs Farm is to deliver a small amount of new employment floorspace, and there would be the potential to explore the possibility of delivering similar at Horton Farm (subject to further masterplanning work, e.g. considering the possibility of delivering a mixed use community hub, which is something that might typically be expected for a scheme of this scale). However, the overriding consideration here is that none of the Green Belt sites in question would deliver significant new employment land. In turn, the primary consideration here is the need to deliver new homes in order to support the local economy, recognising the needs of businesses in terms of access to a suitably skilled local workforce. House prices and lack of specific housing types and tenures, including family and affordable housing, can be a major issue for the effective functioning of local economies. Also, there is a need to consider the importance of suitable housing in terms of supporting productive home working and individual productivity more generally. Finally, with regards to the urban area, it is likely to be the case that support for higher density schemes with a focus on delivering additional new homes also enables delivery of additional new employment floorspace (likely in the form offices or flexible employment space), but this is somewhat uncertain at this stage.
- **Historic environment** – is a key consideration enabling differentiation between the growth scenarios. Beginning with **Scenarios 1 and 2**, higher density development in the urban area (Scenario 2), and potentially the town centre in particular, gives rise to significant tensions with historic environment objectives, in the Epsom and Ewell context. However, on the other hand, exporting unmet need (highest under Scenario 1) is potentially problematic, given the lack of any certainty regarding where unmet need will ultimately be met, and given widespread historic environment constraint across Surrey and the wider sub-region.

With regards to the remaining scenarios, the first point to note is that **Scenario 6** performs very poorly, because of the degree of constraint affecting Land south of West Park. There is uncertainty as to whether the land falls within a conservation area (discussed above); however, regardless, the land relates very closely to two western-most two components of the Hospitals Cluster Conservation Area (see Figure B above; also [Figure 8.1](#) in the SR). Also, under Scenario 6, the assumed SE Epsom cluster is subject to a degree of constraint, given adjacent Epsom Cemetery and also the former rifle butts that comprises a central component of this cluster, and which is associated with a bridleway and mature field boundaries. All these features appear on the pre-1914 OS map, as does nearby Epsom Racecourse (which dates from the C17<sup>th</sup>).

With regards to **Horton Farm**, the site relates closely to *three* components of the Hospitals Cluster Conservation Area, and there is a listed farmhouse onsite. However, it is less clear that the land parcel (area of farmland) contributes significantly to appreciation of the conservation area (as a whole), and there could well be the potential for sympathetic development to complete the ‘story’ of reimagining the historic hospitals cluster. Much depends on the scale of growth (possibly <1,500 homes) and the detailed approach that is taken to masterplanning and design, and there would be a clear need to work closely with Historic England.

Finally, **Downs Farm** is adjacent to a conservation area associated with an early C20<sup>th</sup> housing estate, and land within the site does rise away from the conservation area; however, the proposed greenspace could mitigate any visual impacts. Again, there is a need to gather further evidence through consultation.

As a final point, it is important to recall that, as well as the package of urban sites that feature across all of the scenarios (discussed above), under all scenarios there is also the assumption that Land at West Park would be allocated for 150 homes. This would involve redevelopment of underused NHS land within and adjacent to the West Park component of the Hospitals Cluster Conservation Area, hence there will be a clear need to undertake further work, in collaboration with Historic England. The aim might be for 'heritage-led' redevelopment that learns lessons from recent experiences elsewhere in the former hospitals cluster.

- Housing** – whilst there is (and has always been) flexibility to set a **housing requirement** below LHN, from a 'housing' perspective there is a clear need to set the housing requirement at LHN if at all possible and, if this is not possible, set the housing requirement at a figure as close as possible to LHN. This is the key factor that enables differentiation between the alternative growth scenarios. There are two other key considerations here. Firstly, there is a need to recognise that greenfield (Green belt) sites are typically well suited to delivering a **good housing mix**, including a mix of types (including family housing), tenures (i.e. a good mix of affordable housing tenures, mindful of extremely high needs, as discussed above) and specialist housing, including for older people (although urban sites can also be well suited to some types of older persons housing, given good accessibility to the town centre or a local centre). Brownfield sites can tend to face viability challenges (at least relative to greenfield sites) that lead to challenges in respect of delivering a good housing mix. Secondly, the scale of Horton Farm (also its configuration, with a plethora of access options) means that it is very well suited to providing for **Gypsy and Traveller accommodation needs**. The Council has recently completed an accommodation assessment, which finds that there is a need for 12 pitches for those who meet the 'planning definition' set out within the Government's Planning Policy for Traveller Sites (PPTS, 2015), which essentially relates to ongoing active travelling, or otherwise a full 'cultural' need for 18 pitches. Recent legal precedent lends weight to providing for the full 'cultural' need (in order to avoid discrimination against those who cannot travel), which is at a level (18 pitches) that could prove challenging to meet in the local context. Delivering new pitches as part of strategic urban extensions is not necessarily an ideal solution, but is a key option to explore in the Epsom and Ewell context (and, as discussed, Horton Farm is well suited). There are important masterplanning considerations that will warrant further work, e.g. there would likely be a strong argument for several smaller sites (e.g. comprising ~3 or 4 pitches) rather than one large site.
- Land, soils and resources** – Horton Farm and Downs Farm are in productive agricultural use, whilst the other Green Belt site options in question appear to be in use for keeping horses (potentially an important consideration for the local economy, given Epsom Racecourse) or, in the case of Land adjoining Ewell East Station, sports pitches. None of the site options in question have been surveyed in detail to ascertain the grade of **agricultural land** (see the 'post 1988 criteria' dataset available at [magic.gov.uk](http://magic.gov.uk)), but the nationally available low resolution/accuracy 'provisional' agricultural land quality dataset shows all agricultural land in the borough to be either 'grade 3' quality (which may or may not be 'best and most versatile, which the NPPF classes as land that is of grade 1, 2 or 3a quality) or 'grade 4' quality. Specifically, there is a prevalence of grade 4 quality land in the south of the borough, which could potentially mean that Horton Farm comprises higher quality agricultural land than is the case for Downs Farm; however, there is no certainty in this respect. There are two further considerations. Firstly, with regards to **unmet need**, it is fair to predict that scenarios involving high levels of unmet need would lead to pressure on productive, and potentially higher grade, agricultural land over-and-above scenarios involving meeting more of Epsom and Ewells housing need locally. However, this is a fairly marginal consideration, as the national 'provisional' dataset does not show a high prevalence of higher quality (grade 2) quality land across the wider sub-region. There is a concentration of higher quality agricultural land to the west of Epsom (e.g. Spelthorne and Runnymede), but there is little or no potential for unmet need for Epsom and Ewell to be provided for here. Secondly, whilst there do not appear to be any minerals [safeguarding areas](#) intersecting the borough, there is a **'waste consultation area'** associated with a waste transfer site adjacent to Downs Farm (former Epsom Chalk Pit / Lime Works). This is a constraint to development but has been accounted for in masterplanning proposals received to date.
- Landscape** – is clearly a key consideration. Beginning with **Scenarios 1 and 2**, the new emphasis on protecting local character in the draft NPPF (December 2022) is noted; however, a key consideration here is a need to support higher densities in order to reduce pressure on sensitive greenfield locations (whether within Epsom and Ewell or the wider sub-region). With regards to **Scenarios 3 and 4**, it is not possible to conclude that these scenarios perform worse than Scenario 2 (urban area only) once account is taken of the extensive landscape constraints affecting the wider sub-region, including the Surrey Hills AONB and the High Weald AONB (constraining Horsham and land south of Crawley) and the Area of Great Landscape Value that essentially extends the Surrey Hills AONB. Unmet need from Epsom and Ewell would not be provided for in one of these designated landscapes (certainly not an AONB), but the presence of these designated landscapes serves to indicate the scale of the challenge. Both Horton Farm and Land adjoining Ewell East Station have their landscape challenges, but these are considered to be fairly limited.



With regards to **Hook Road Arena**, this site is thought to perform strongly in landscape terms on account of its strong containment by existing built form, although there is a historic TPO tree belt at the northern extent.

With regards to **Horton Farm**, this is a historic area of farmland closely associated with Hospitals Cluster, surrounded by historic roads/lanes on three sides, and with the majority of the historic field boundaries shown on the pre-1914 OS map still present. However, there are no public rights of way intersecting or adjacent to the site (other than footways along the roads), and along the entire perimeter of the site the roads appear to have been widened and otherwise modernised (including with near complete coverage of offroad cycle paths), which likely limits any sense of rurality. There are widespread views into the site from the adjacent roads and associated pedestrian / cycle paths, but these are filtered views through hedgerows (of varying thickness / quality, and with some standard trees) and, whilst the land does rise to the west, it is not clear that there are extensive views into or across the site that are likely to be of particularly high value (this will require further consideration through masterplanning, noting that the current proposal is to focus greenspace on lower land subject to surface water flood risk). Finally, there is a need to note limited or no concern that development would lead to a risk of future development creep / sprawl, i.e. there is confidence in being able to define a defensible new Green Belt boundary. Given an assumption that Horton Country Park will be protected in perpetuity, the only slightly 'softer' boundary is to the northeast, where there is a woodland cemetery, a conservation area (part of the former hospitals cluster and a riding school for the disabled (Epsom RDA).

With regards to **Land adjoining Ewell East Station**, the site is considered well-contained in Green Belt terms, but there is an adjacent historic bridleway. It will likely be possible to mitigate visual impacts from here.

Finally, with regards to **Scenarios 5 and 6**, the sites in question are judged to be constrained in landscape terms, such that the scenarios perform poorly, even though there would be reduced unmet need. Beginning with Downs Farm, the land here begins to rise towards Epsom Downs, and there is a concern in respect of securing a defensible new Green Belt boundary. Specifically, the concern would be that development leads to subsequent pressure to release the parcel of land to the south of A2022 which, in turn, would lead to a risk of coalescence between Epsom and Banstead. It is recognised that concerns are reduced on account of the proposed greenspace within the Downs Farm site (on the high point of the site), and also given the presence of the aforementioned waste transfer facility, but a degree of concern remains nonetheless, including noting that land to the south of the A2022 is in the same land ownership as the current Downs Farm site option. Land to the south of the A2022 could feasibly be offered as greenspace (albeit at the expense of productive agricultural land). Moving on to Land south of Manor Park, the extent of woodland TPOs may indicate a good degree of visual containment; however, a concern is intersecting and adjacent public rights of way, including the Thames Downs Link long distance path (bridleway), which links Epsom Common to Horton Country Park. Finally, with regards to the SE of Epsom cluster, there is a clear landscape concern given quite steeply rising land, the nearby Epsom Downs viewpoint (although there is intervening woodland, which may provide screening); also a historic bridleway passing through the cluster, linking Epsom to Epsom Downs.

- **Transport** – is another key consideration influencing both definition of the definition of RA growth scenarios (see discussion above) and their appraisal. Avoiding unmet need, as far as possible, is crucially important from a transport planning perspective, not only because housing need met distant from source leads to 'unstainable' travel patterns, but also because effective strategic planning for transport infrastructure (led by the County Council, National Highways and Transport for the South East) requires a degree of certainty regarding where housing growth will occur. With regards to the Green Belt site options in question, key considerations have already been discussed above, and the following is a summary: **Hook Road Arena** performs very well; **Horton Farm** has reasonable train and bus connectivity, very good cycle connectivity, including to existing local centres (there are offroad routes on nearly all sides of the site), very good road access (subject to further work), and there is a clear opportunity to better-connect the somewhat isolated existing community of Long Grove; **Land adjoining Ewell East Station** has excellent train connectivity and also good access to bus services along the A24; Downs Farm performs reasonably well, noting the proposal to deliver a new walking/cycling link to improve connectivity to Epsom Downs Station (although the route is not direct; also, the service is not as good as from Epsom (in particular) and Ewell East); and the **other two site options** perform notably less well (although Land South of Manor Park is in relative proximity to Epsom town centre, and there are cycle routes in the area, and a bus service, following recent development).
- **Water** – a key consideration is often capacity at wastewater treatment works (and the environmental capacity of the water courses that receive treated wastewater), but there is currently a lack of evidence in respect of any issues (issues tend to be associated with rural areas more so than suburban areas such as Epsom). Once again, it is also fair to flag a concern with unmet housing need. For example, Crawley and Horsham fall within the Sussex North Water Resource Zone, where all new development must demonstrate [water neutrality](#) (and development is currently unable to do so, ahead of offsetting schemes being set up).

## Selecting the preferred option

The following statement explains EEBC officers' reasons for supporting **Scenario 4**:

"Meeting housing need locally is a priority issue, and generating unmet need leads to a wide range of issues at the Surrey / sub-regional scale. However, the appraisal serves to highlight a range of drawbacks to higher growth. As such, the plan seeks to follow a middle path, striking a balance between competing objectives.

In particular, the appraisal serves to highlight significant drawbacks to Scenarios 1 and 6, and we believe that significant weight can be attributed to these drawbacks, such that Scenarios 1 and 6 are judged to perform poorly overall. With regards to Scenario 1, we agree that there is a need to take steps to minimise unmet housing need as far as possible. There is a national and local housing crisis, for example mindful that only 15 affordable homes have been delivered in total over the past two monitoring years, in comparison to an identified need for 652 per annum. Furthermore, minimising unmet housing need is important from wide-ranging other perspectives, including from a perspective of supporting the local and sub-regional economy supporting the achievement of transport, decarbonisation and certain environmental objectives. With regards to Scenario 6, it is recognised that the effect would be to minimise unmet housing need; however, the predicted impacts to the local area are cumulatively judged to be unacceptably high. Fundamentally, Epsom and Ewell is a heavily urbanised borough where remaining parcels of undeveloped Green Belt land are precious and must be protected. This is the widespread view locally, but this view also aligns strongly with latest Government policy.

The merits of the four middle performing scenarios are more finely balanced. However, it is considered appropriate to highlight Scenario 2 as performing least-well. This is because of the level of unmet housing need that would be generated. There is a need to release some greenfield Green Belt land for development.

Differentiating between the overall merits of Scenarios 3, 4 and 5 is more challenging. However, on balance, Scenario 5 is judged to be the least preferable of the three. The site that would be additionally allocated under this scenario – Downs Farm – is subject to considerable landscape constraint, particularly in the sense that development could put at risk the ability to maintain a defensible landscape gap between Epsom and Banstead in this area. Also, the site would deliver limited benefit to the local area (the proposed school is noted, but there is not currently known to be a need for a new school in the borough, even under higher growth scenarios) and the proposed walking/cycling link to Epsom Downs Station is somewhat indirect. These conclusions are reached on the basis of scheme assumptions that are subject to change, and it is recognised that the option of housing growth here may require further consideration, recognising the importance of closing the gap to housing need.

Looking at Scenarios 3 and 4, there is a clear preference for **Scenario 4** as this is a higher growth scenario and because the site additionally allocated under this scenario, namely **Land adjoining Ewell East Station**, is judged to perform well in several respects. In particular, it performs well in transport terms, given the adjacent train station, but it will also make provision for retail to meet an existing need within the local area. There are some challenges to bringing the site forward, most notably in respect of providing sports pitches, but these are not insurmountable, and there is also good potential to define a new defensible Green Belt boundary, given Nescot (North East Surrey College of Technology) playing fields to the west, built form to the north and east and Priests Hill SNCI to the south. For all these reasons, there are judged to be exceptional circumstances to justify the release of this land from the Green Belt.

Finally, with regards to the three other greenfield Green Belt sites proposed for allocation under Scenario 4 (Horton Farm / Chantilly Way and Hook Road Arena), the discussion presented above has already served to explain why there is support for allocating these sites and why exceptional circumstances to justify the release of these sites from the Green Belt are judged to exist. However, for completeness, key considerations include:

- **Horton Farm** – is subject to limited constraint and there is the potential for a 'strategic' urban extension that delivers a good mix of housing *and more* (including land for Gypsies and Traveller pitches, which is a very important consideration); indeed, it is the only option to deliver a strategic urban extension that is known to exist (if Downs Farm is judged not to warrant this status). The site performs reasonably well in transport terms, and there are few if any concerns regarding future development creep / sprawl. Furthermore, it is anticipated that growth here will complement the development that has happened to the west of Epsom across the former hospitals cluster sites (following the Core Strategy, 2007), from a place-making perspective. At the current time it is not clear whether a primary school is needed, but it is anticipated that there would be the potential to deliver one should the need be identified through the consultation on the Draft Local Plan.
- **Chantilly Way** – is a small site that links very closely to Horton Farm, and gives rise to few concerns. There is a question regarding the appropriate number of homes to deliver on site, given its linear configuration.
- **Hook Road Arena** – performs well on the assumption of built form in the southern part of the site only, with a new sports hub delivered in the northern part. Ewell East Station is nearby, and this is Council owned land, which leads to confidence and flexibility in respect of what can be delivered onsite.

## Part 2: Draft plan appraisal

Part 2 of the report presents an appraisal of the current draft plan. The appraisal comprises a series of 13 narrative discussions – one for each component of the SA framework – where the aim of each discussion is to reach a conclusion on the ‘significant effects’ of the plan (as a whole). In practice, the appraisal is an opportunity to elaborate on the appraisal of Scenario 4 (as presented above) with added consideration given to proposed policies.

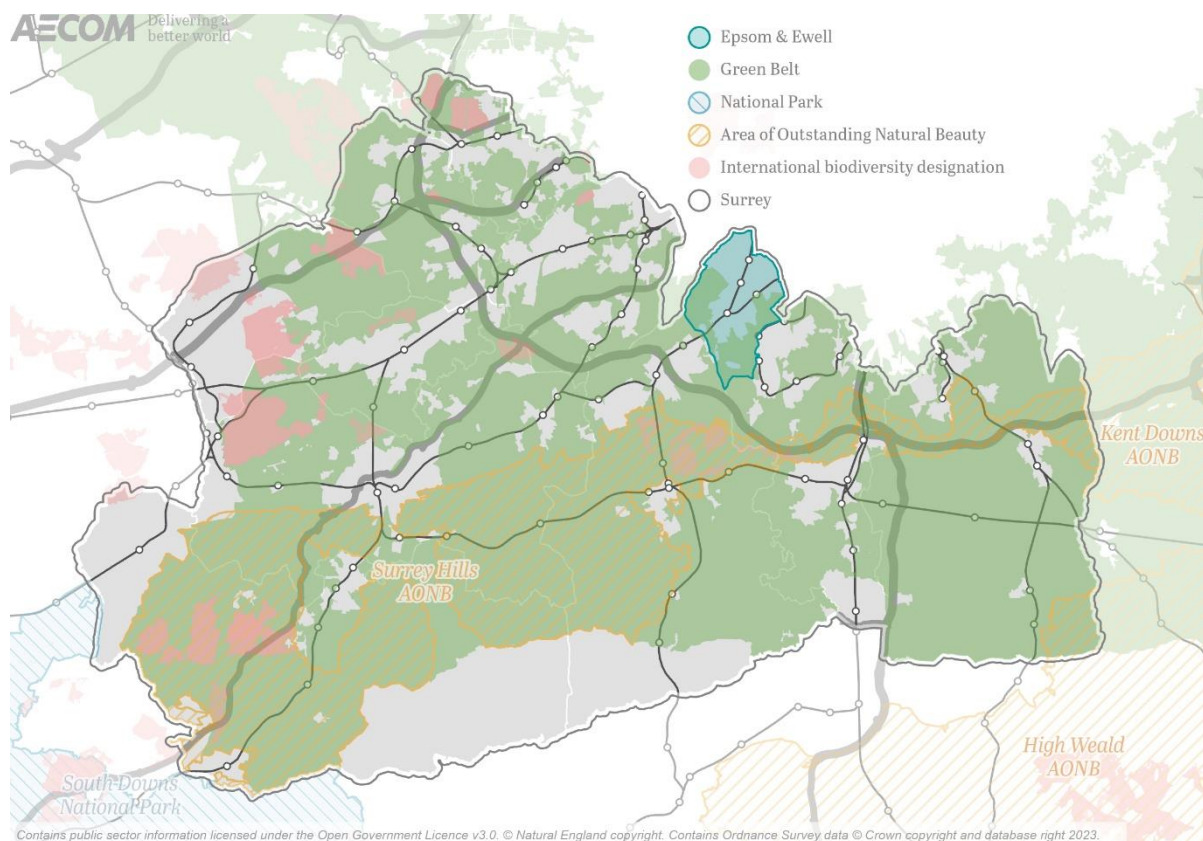
The appraisal conclusion is as follows:

- **Significant positive effects** – the appraisal does not predict any significant positive effects; however, it is anticipated that it will be possible to predict significant positive effects prior to plan finalisation, in light of further work (including in response to new evidence gathered through the current consultation). One issue is that the ‘baseline’ (no plan) scenario is likely one whereby there continues to be low growth in the borough, because of the protection given to Green Belt under the NPPF. This is in contrast to non-Green Belt authorities, where there is often an urgent need to adopt a local plan to avoid a situation whereby there is problematic unplanned growth under the presumption in favour of sustainable development / tilted balance (‘planning by appeal’).
- **Moderate or uncertain (MoU) positive effects** – the appraisal of reasonable growth scenario 4 (in Part 1) leads to a prediction of MoU positive effects only in terms of **Accessibility** (because growth will deliver new community infrastructure and support the vitality of existing centres). However, having taken account of DM policy it is possible to also predict MoU positive effects in terms of: **Communities** (because numerous policies are focused on addressing the needs of new and existing communities); **Economy and employment** (because of the policy targeted at protecting existing employment land, which is a key issue locally); and **Transport** (this is another issue that is a focus of wide-ranging policy, and detailed evidence has been prepared to inform the plan, albeit there is also a need for further work, given the critical importance of supporting modal shift away from the private car, and delivering targeted upgrades to transport infrastructure).
- **Neutral effects** – are predicted for **several topics**. In each case there are a range of issues and impacts, but it is difficult to reach a conclusion on whether overall effects will be positive or negative, relative to the baseline (no plan) scenario, and will be of any significance. For example, in respect of Biodiversity, certain allocations do give rise to a degree of risk, but there is a need to recall that the baseline scenario involves a situation whereby there is increased pressure to accommodate unmet housing need within a constrained sub-region.

With regards to Climate change mitigation, whilst there can be little doubt that the plan will lead to an improvement on the baseline (with respect to per capita greenhouse gas emissions), the question is whether the extent of the improvement is *enough*, given the scale of the net zero challenge, with the NPPF discussing the need to “*shape places in ways that contribute to radical reductions in... emissions.*” It is noted that the proposal is to require that greenfield schemes exceed the emissions requirements of Building Regulations (which are currently being tightened to a ‘Future Homes Standard’), which is strongly supported.

- **Moderate or uncertain (MoU) negative effects** – are not predicted under any topic headings. However, in two cases this decision was quite marginal. Firstly, there are clearly arguments to suggest that Landscape impacts will be negative and of some significance, even accounting for the issues that can be envisaged under a baseline (no plan) scenario at the sub-regional scale. It is important to recall that Green Belt is not a landscape designation; however, on the other hand, in the Epsom and Ewell context, parcels of land with high Green Belt value will also often tend to have high landscape value, including given the importance of settlement separation from a perspective of seeking to ensure a strong sense of place. Secondly, with regards to the Historic Environment, a key factor is the proposed allocation of a PDL Green Belt site within a conservation area.
- **Significant negative effects** – must be predicted under the **Housing** topic heading, as there are reasonable alternative approaches that might be taken that would involve setting the local plan housing requirement at a figure closer to local housing need (LHN) such that the local plan exports less unmet need to a constrained sub-region where unmet need is already a major problem. However, it is recognised that this decision has been taken on balance, weighing-up competing objectives, as discussed above. Also, it is recognised that wide-ranging policy is proposed aimed at supporting the achievement of housing-related objectives; and the proposal to go some way towards meeting the accommodation needs of Gypsies and Travellers in full. In respect of housing-related thematic policy, a key point to note is the proposal to prioritise delivery of affordable housing, with the proposal to require 40% affordable housing on the four greenfield allocations. Given the scale of affordable housing needs there could be a need to consider the possibility of setting a still higher requirement, albeit this would need to be within the constraints of development viability, and in recognition of the inevitable need to trade-off against other important policy objectives, e.g. climate change mitigation / net zero.

Figure D: Examples of select sub-regional constraints to providing for Epsom and Ewell's unmet housing need



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The figure above shows a selection of key sub-regional issues and constraints that create a challenge in respect of meeting unmet need from Epsom and Ewell. N.B. by way of orientation, it is important to note that land beyond the Green Belt within west Surrey is almost entirely urbanised, associated with the A331 corridor / Blackwater Valley, between Camberley and Farnham.

Wider environmental challenges include national and local biodiversity designations (e.g. landscapes associated with very high densities of ancient woodland in south Surrey); local landscape designations (including the Area of Great Landscape Value, AGLV, within Surrey, which is an extension of the AONB and currently being reviewed by Natural England with a view to potentially extending the AONB); and the 'water neutrality' constraint that is a major barrier to growth at Crawley, Horsham and other locations in the Sussex North Water Resource Zone.

Another factor that could be explored through further mapping / spatial analysis is functional connectivity between Epsom and Ewell and locations that could conceivably provide for unmet need. There is limited firm evidence regarding the extent of housing and economic market areas; however, there are some obvious points for consideration around transport connectivity, which is a key factor influencing housing and economic market areas.

In this respect, a key point to note is that Epsom and Ewell links directly to wider Surrey via the A24, which is not shown on the map above, because it is not part of the Strategic Road Network managed by National Highways. It is also a rail corridor, and the trainline is shown on the map, linking Epsom to Leatherhead, Dorking and Horsham. There is little or no reason to consider this a growth corridor. Otherwise, the borough is near equidistant between two more strategic road and rail corridors, namely the A3 corridor to Guildford and beyond (East Hampshire); and the A23 corridor to Gatwick, Crawley and Brighton.

Finally, there is a need to consider locations other than Epsom and Ewell where unmet housing need is an existing or likely / potential future issue, and locations where plan-making work to date serves to evidence a conclusion that there is little or no realistic potential to provide for unmet needs. It is beyond the scope of this brief note to present a detailed review, but the issues are significant. For example, the emerging local plans for neighbouring Mole Valley and Elmbridge are both likely to generate significant unmet need. In summary, Surrey is an obvious key scale at which to deal with unmet need, but there are no clear mechanisms in place, and inherent challenges.



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