



LICENSING AND PLANNING POLICY COMMITTEE

Tuesday 22 September 2026 at 7.30 pm or at the rising of the special meeting of the Licensing and Planning Policy Committee on the same date, whichever is the later.

Place: Council Chamber, Epsom Town Hall

Online access to this meeting is available on YouTube: [Link to online broadcast](#)

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 Peter O'Donovan (Chair)
Councillor Neil Dallen (Vice-Chair)
Councillor Steve Bridger
Councillor Julian Freeman
Councillor Rob Geleit

Councillor James Lawrence
Councillor Phil Neale
Councillor Kieran Persand
Councillor Humphrey Reynolds
Councillor Clive Woodbridge

Yours sincerely

Chief Executive

For further information, please contact democraticservices@epsom-ewell.gov.uk or tel: 01372 732000

EMERGENCY EVACUATION PROCEDURE

No emergency drill is planned to take place during the meeting. If the fire alarm sounds continuously, or if you are instructed to do so, you must leave the building by the nearest available exit. You will be directed to the nearest exit by council staff. It is vital that you follow their instructions.

- You should proceed calmly; do not run and do not use the lifts;
- Do not stop to collect personal belongings;
- Once you are outside, please do not wait immediately next to the building, but move to the assembly point at Dullshot Green and await further instructions; and
- Do not re-enter the building until told that it is safe to do so.

Public information

Please note that this meeting will be held at the Town Hall, Epsom and will be available to observe live using free YouTube software.

A link to the online address for this meeting is provided on the first page of this agenda. A limited number of seats will be available on a first-come first-served basis in the public gallery at the Town Hall. If you wish to observe the meeting from the public gallery, please arrive at the Town Hall reception before the start of the meeting. A member of staff will show you to the seating area. For further information please contact Democratic Services, email: democraticservices@epsom-ewell.gov.uk, telephone: 01372 732000.

Information about the terms of reference and membership of this Committee are available on the [Council's website](#). The website also provides copies of agendas, reports and minutes.

Agendas, reports and minutes for this Committee are also available on the free Modern.Gov app for iPad, Android and Windows devices. For further information on how to access information regarding this Committee, please email us at democraticservices@epsom-ewell.gov.uk.

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 Act 1972 (as amended). Should any such matters arise during the course of discussion of the below items or should the Chair agree to discuss any other such matters on the grounds of urgency, the Committee may wish to resolve to exclude the press and public by virtue of the private nature of the business to be transacted.

Questions and statements from the Public

Up to 30 minutes will be set aside for questions and statements from members of the public at meetings of this Committee. Any member of the public who lives, works, attends an educational establishment or owns or leases land in the Borough may ask a question or make a statement on matters within the Terms of Reference of the Committee.

All questions must consist of one question only and cannot consist of multiple parts. Questions and statements cannot relate to planning or licensing committees matters, 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 Chair are defamatory, offensive, vexatious or frivolous will not be accepted. Each question or statement will be limited to 3 minutes in length.

If you wish to ask a question or make a statement at a meeting of this Committee, please contact Democratic Services at: democraticservices@epsom-ewell.gov.uk

Questions must be received in writing by Democratic Services by noon on the fifth working day before the day of the meeting. For this meeting this is **Noon, Tues 15 September**.

A written copy of statements must be received by Democratic Services by noon on the working day before the day of the meeting. For this meeting this is **Noon, Mon 21 September**.

For more information on public speaking protocol at Committees, please see [Annex 4.2](#) of the Epsom & Ewell Borough Council Operating Framework.

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Filming or recording must be overt and persons filming should not move around the room whilst filming nor should they obstruct proceedings or the public from viewing the meeting. The use of flash photography, additional lighting or any non-handheld devices, including tripods, will not be allowed.

AGENDA

1. QUESTIONS AND STATEMENTS FROM THE PUBLIC

To take any questions or statements from members of the Public.

2. DECLARATIONS OF INTEREST

To receive declarations of any Disclosable Pecuniary Interests or other registrable or non-registrable interests from Members in respect of any item to be considered at the meeting.

3. MINUTES OF THE PREVIOUS MEETING (Pages 5 - 18)

The Committee is asked to confirm as a true record the Minutes of the Special Meeting of the Committee held on **19 May 2026** (attached) and the Minutes of the Meeting of the Committee held on **16 June 2026** (attached) and to authorise the Chair to sign them.

4. TANDRIDGE DISTRICT COUNCIL LOCAL PLAN 2024-2044: SPATIAL DEVELOPMENT STRATEGY CONSULTATION (REGULATION 18) (Pages 19 - 26)

Tandridge District Council (TDC) recently consulted on a draft Local Plan relating to Spatial Strategy Options (Regulation 18). As TDC will become part of the new East Surrey Unitary Authority from 1 April 2027 it is important that the Council provided a formal response to the consultation.

5. CONSULTATION ON THE PUBLICATION DRAFT OF THE KINGSTON LOCAL PLAN (REGULATION 19) (Pages 27 - 34)

Epsom and Ewell Borough Council are a statutory consultee on Local Plans from neighbouring authorities. The London Borough of Kingston recently consulted on a publication draft Local Plan (Regulation 19 Stage). This is the final consultation stage before the plan is submitted for independent examination.

6. AUTHORITY MONITORING REPORT 2025-2026 (Pages 35 - 52)

The Authority Monitoring Report (AMR) is a factual report that has two purposes; to monitor progress towards new Local Development Documents and to monitor the effectiveness of key policies set out in Local Development Documents.

7. EPSOM AND EWELL LOCAL PLAN (2022-2040) MAIN MODIFICATIONS CONSULTATION (Pages 53 - 536)

The Examination of the Epsom and Ewell Local Plan 2022-2040 commenced following the appointment of a Planning Inspector on 1 April 2025. The Planning Inspector is assessing the legal compliance of the plan and its compliance with the four tests of soundness set out in the National Planning Policy Framework (NPPF).

The purpose of this report is to present the Planning Inspectors proposed Main Modifications to the Submission Epsom and Ewell Local Plan (2022-2040) (Appendix 1) to the Committee so that they can make a recommendation to Full Council that a statutory public consultation be undertaken for a period of 6 weeks.

8. REVISED PLAN MAKING SYSTEM AND PREPARATION OF A NEW EPSOM AND EWELL LOCAL PLAN (To Follow)

A new plan-making system was introduced through Regulations published in March 2026. The purpose of this report is to inform members of this new system of plan making and the subsequent correspondence between the Head of Planning Policy and Economic Development and Ministry of Housing, Communities and Local Government (MHCLG) representatives concerning the Council commencing work on its next Local Plan for the borough whilst the Examination of the Epsom and Ewell Local Plan (2022-2040) continues.

**Minutes of the Meeting of the LICENSING AND PLANNING POLICY COMMITTEE
held at the Council Chamber, Epsom Town Hall on 19 May 2026**

PRESENT -

Councillor Peter O'Donovan (Chair); Councillor Clive Woodbridge (Vice-Chair) and Councillor Liz Frost (as nominated substitute for Councillor Neil Dallen); Councillors Steve Bridger, Julian Freeman, Rob Geleit, Phil Neale, Kieran Persand, Christine Howells (as nominated substitute for Councillor Alex Coley) and Alan Williamson (as nominated substitute for Councillor Humphrey Reynolds)

In Attendance: Councillor Shanice Goldman and Councillor James Lawrence

Absent: Councillor Neil Dallen, Councillor Alex Coley and Councillor Humphrey Reynolds

Officers present: Ian Mawer (Head of Planning Policy and Economic Development) and Phoebe Batchelor (Democratic Services Officer)

37 DECLARATIONS OF INTEREST

No declarations of any Disclosable Pecuniary Interests or other registrable or non-registrable interests were made by Members with respect to any items to be considered at the meeting.

38 MOTION

The Committee received a verbal update from the Head of Planning Policy and Economic Development on the current stage of the Local Plan examination.

The update included the following key points:

- The Local Plan had been submitted to the Planning Inspectorate on 10 March 2025, at which point the examination stage commenced and control of the process passed to the appointed Planning Inspector.
- Additional work had been undertaken at the direction of the Inspector, including:
 - Review of Green Belt topic paper methodology and assessments

- Reassessment of specific urban sites in the land availability assessment
 - Identification of potentially suitable sites to address unmet housing need
- A number of supporting evidence documents had been produced, including and submitted in April 2026:
 - Sustainability Appraisal Addendum
 - Habitats Regulations Assessment Addendum
 - Transport Assessment Addendum
 - Infrastructure Delivery Plan Addendum
- A non-statutory public consultation on these documents commenced on 11 May 2026 and would close on 15 June 2026.
- A further hearing session was scheduled for 2 July 2026.
- The Inspector would subsequently determine whether:
 - The plan could proceed with main modifications, or
 - The plan should be withdrawn.

The Head of Planning Policy and Economic Development confirmed that no changes had been made to the submitted Local Plan itself, and that only the Inspector could introduce modifications.

The following matters were considered:

- Councillor Persand proposed that the motion was deferred to a meeting at a later date when a legal officer is present.

Councillor Freeman seconded the proposed motion.

The Committee voted (4 for and 6 against) on the proposed motion and the motion was lost.

- a) **Legal Advice.** Some Members of the Committee raised their concerns and disappointment that the motion to defer the meeting until a legal officer is present was lost. They expressed that a legal officer must be present to give advice to Members. A Member raised that they had only been informed that a legal officer would not be present at 4pm on the day of the meeting. The Chair explained that legal advice had been provided by the Monitoring Officer prior to the Committee Meeting, and it had been confirmed that the Head of Planning Policy and Economic Development

had complied with the delegated authority granted to him in carrying out the work requested by the Inspector.

- b) **Adjournment.** The Chair adjourned the meeting, at 20.10, in order to attempt to contact the Council's Monitoring Officer to obtain clarification on legal matters raised. The meeting was then reconvened at 20.27. Following contact with the Monitoring Officer, the Chair confirmed that where a specific request for legal advice was received in advance of the meeting, that this had already been provided to the Member prior to the meeting and reiterated that the matters raised were not relevant to the motion under consideration. A Member raised that legal advice had not been shared with all Committee Members prior to the Committee Meeting, and it could not be reasonably expected for other Members to understand and take on board the legal advice during the Committee Meeting. The Chair stated that the comments were not relevant to the motion in front of Members.
- c) **Processes.** A Member of the Committee asked the Head of Planning Policy and Economic Development to set out the remaining steps in the Local Plan process. The Head of Planning Policy and Economic Development reiterated the next steps set out in the report introduction. He explained that following the hearing, scheduled for the 2 July, the Inspector will advise the Council on whether the plan cannot be found sound and needs to be withdrawn or whether it can be found sound with modifications. The Member asked what the implications are if the plan cannot be found sound by the Inspector. The Head of Planning Policy and Economic Development explained that the Council would be left with a significantly out of date local plan, that dates from 2007, and no five-year land supply, which makes the Council more vulnerable to speculative development. He also informed Committee Members that Epsom and Ewell would have the oldest Local Plan of all the East Surrey authorities. He explained that the Council would then need to start plan making under the new plan making system, which is completely different.
- d) **New Plan.** A Member of the Committee raised that the Epsom and Ewell Local Plan will inevitably become redundant, and a new one will be needed. The Head of Planning Policy and Economic Development explained that with the establishment of the new East Surrey Authority, a new single local plan for the East Surrey Area will need to be prepared. He stated that this task would be a huge undertaking and is unlikely to happen anytime soon. The Plan would also be subject to different criteria as a new plan making system has been introduced and a new tier of planning is coming in as well. He clarified that Epsom and Ewell's Local Plan would stay in effect until it is replaced by the plan prepared by East Surrey.
- e) **Debate on Delegated Authority and Member Oversight.** Members debated the extent to which delegated authority had been used in progressing Local Plan work during the examination stage.

During the debate, the following key points were raised:

- Concern that Members had not had sufficient oversight of evidence submitted to the Inspector
- View that significant changes to evidence base documents should have been considered by the Committee
- Concern regarding the democratic accountability of decisions taken by officers under delegated authority
- The importance of maintaining public confidence in the Local Plan process
- In response, the Chair and the Head of Planning Policy and Economic Development advised that:
 - All work undertaken had been at the request of the Inspector
 - The examination stage is led by the Inspector, not the Council
 - Delegated authority had been applied to enable timely responses to the Inspector
 - The submitted Local Plan itself had not been altered
 - It was also confirmed that:
 - Evidence base documents are not normally subject to Committee approval
 - The final decision on the Local Plan would be taken by Full Council following the Inspector's report
- f) **Reviewing Documents.** A Member of the Committee raised that the issue with the changed documents, submitted to the Inspector, is that it is then not the job of the inspector to review the documents for accuracy, strategic alignment, or consistency. The Member stated that those responsibilities lie with the Committee and the Committee had not been given the opportunity to fulfil those responsibilities. The Member raised that the Inspector only asked the Council to look at urban sites, not green belt sites, and that had been done outside of the prescribed scope of work requested. The Head of Planning Policy and Economic Development explained that the only work undertaken is what was necessary for the examination to proceed and at the request of the Inspector. He explained there were two pieces of work requested in January, one was looking at specific urban sites in the Land Availability Assessment, and one was revisiting section 4 of the Greenbelt Topic Paper because of concerns with consistency of approach and the methodology. He reminded the Committee that they do not approve evidence base. The Inspector requested the Council identify some potential additional sites for

allocation, supported by specific evidence base addendums. The Member quoted a letter from the Inspector to the Council, dated 22 October 2025, and said that the Inspector did not say in the public hearings or in written correspondence that the plan submitted was not sound or that further greenbelt site would need to be included to make the plan sound. The Member stated that the instruction from the Inspector was to revisit the greenbelt paper and ensure the sites are assessed in a consistent manner. The Head of Planning Policy and Economic Development explained that the Inspector will not explicitly state that the plan has been found sound or unsound until her final report at the end of the process. He informed the Committee that the Inspector will only ask for additional work to be undertaken during the examination period if there are soundness concerns.

- g) **Greenbelt sites.** A Member of the Committee quoted a letter received from the Inspector on 5 February 2026, which stated the Inspector was not clear as to what the Council were recommending regarding greenbelt sites and asked for clarification. The Member asked the Head of Planning Policy and Economic Development what his interpretation of the letter was. The Head of Planning Policy and Economic Development explained that during examination hearings, the Inspector expressed concerns that the Council should be doing more to meet housing needs and then asked for a specific piece of work, which relates to specific greenbelt sites, to be looked at again. He confirmed that work was carried out against the revised methodology and produced different outcomes, which resulted in the Inspector asking for clarification, and a further action point to assess additional sites for potential allocation. The Vice Chair asked the Head of Planning Policy and Economic Development to confirm he was not proposing additional sites for inclusion in the Local Plan but was just identifying potential sites that could be included under the instruction of the Inspector. The Head of Planning Policy and Economic Development confirmed that was the case and that the plan remained unchanged from the version submitted in March 2025. A Member asked if the Head of Planning Policy and Economic Development had identified 40 additional hectares of greenbelt land that could be included in the Local Plan. The Head of Planning Policy and Economic Development explained the work requested by the Inspector had been undertaken and was currently subject to public consultation. He explained at this stage it is up to the Inspector if any additional sites are included in the Local Plan to address issues of soundness.
- h) **Sites.** A Member of the Committee stated that if Councillors had been considering potential sites, instead of Officers, they would have reached different conclusions. The Member stated they did not believe delegated authority should have been granted to officers, as only elected Councillors are accountable to residents and know what their residents need. The Chair informed the Committee that Officers are employed by the Council to do a specific job, which they have the expertise and experience to carry out. The Member stated that residents have made clear that they do not want greenbelt sites to be built on.

- Councillor Persand proposed an amendment to part 2 of the motion,

(2) *Withdraw* delegation of authority item P7:

‘To propose changes and corrections to the Local Plan (2022-2040) and supporting documents, including policy updates, editorial, typographical and grammatical errors, during and following the publicity period, plan submission and during examination.’

Councillor Freeman seconded the proposed amendment.

The Committee voted (4 for, 5 against, and the Chair not voting) against the proposed amendment and the motion was lost.

- i) **Meeting.** The Vice Chair suggested the Committee were given an opportunity to review the documents currently being publicly consulted on. A Member raised that the documents should have been reviewed before they were submitted. The Head of Planning Policy and Economic Development explained the documents have been submitted, published, and accepted by the Inspector. He raised that a Member Briefing could be arranged to discuss the documents currently being consulted on. The Member said that a Member Briefing would be welcome but should not be in place of a public Committee Meeting.
- j) **Public Consultation.** A Member of the Committee asked that more notice is taken of the public consultation responses than in previous Local Plan public consultations. The Head of Planning Policy and Economic Development explained that during the examination phase, the consultation responses are sent to the Inspector to consider, it is not for the Council to consider them. He explained that a full comms plan has been drawn up to promote the non-statutory public consultation and encouraged residents and Councillors to respond. The responses received to the consultation and shared with the Inspector will guide the discussions at the 2 July hearing. The Member asked that the opinions of residents are heard. The Chair explained that every comment received during the reg 18 and 19 public consultations was looked at. He explained that the current public consultation responses will be sent to the Inspector to consider.
- k) **Documents.** A Member asked where it says that documents cannot be changed or resubmitted. He queried this as he stated that there is scope and precedent to resubmit documents as documents are changed during the examination hearings. The Head of Planning Policy and Economic Development explained that the Inspector has approved the documents submitted for publication and there is no precedent for withdrawing the documents at this stage.
- l) **Main modifications.** The Vice Chair asked if the Licensing and Planning Policy Committee are able to express a view on the Inspector's main modifications. The Head of Planning Policy and Economic Development explained that each authority have a different process for the next steps of

the examination. He explained that the Inspector's proposed main modifications will be subject to a statutory six-week public consultation, following this, the Inspector will draft a final report with binding modifications. The Council will need to accept the modifications if it wishes to adopt the Plan.

- m) **Member Scrutiny.** A Member of the Committee raised their concern with the lack of member scrutiny throughout the Local Plan process. The Member asked for potential dates to be identified and reserved where the Committee can review the main modifications, and if necessary, make further recommendations and submissions to Full Council.
- n) **Process.** A Member of the Committee raised that the main modifications need to come back to Committee to be scrutinised and cannot go straight to Full Council. The Head of Planning Policy and Economic Development explained the process leading up to the submission of the draft Local Plan. He informed the Committee that plan remains as it was when submitted until the Inspector publishes her proposed main modifications, which will go out to public consultation. The Inspector will review the responses before drafting her final report. A Member asked if during the consultation period, proposed recommendations or changes can be raised. The Head of Planning Policy and Economic Development explained that anyone can respond to the public consultation on the Inspector's proposed main modifications. A Member raised that the modifications should come to Committee before they go to public consultation. The Head of Planning Policy and Economic Development informed the Committee he would check if Licensing and Planning Policy Committee and/or Full Council need to approve the main modifications going to public consultation.
- o) **Terms of Reference.** A Member of the Committee raised that the Terms of Reference for the Licensing and Planning Policy Committee set out that, *'To consider and approve: a) Local Plan documents for public consultation (including Development Plan Documents up to Preferred Options stage and Supplementary Planning Documents up to Consultation stage),'* and therefore, there should be a meeting held before the main modifications go to public consultation. The Head of Planning Policy and Economic Development explained that the ToR gives Licensing and Planning Policy Committee that responsibility, up to the preferred option stage, which has passed.
- p) **Questions.** A Member of the Committee raised that there is no stage left in the process for elected members to question and scrutinise the proposed main modifications. The Chair invited Members to participate in the public consultation. The Member asked if councillors could only contribute to the public consultation as residents and not as elected officials. The Chair confirmed that is the case.

The Chair adjourned the meeting at 21:43. The meeting was resumed at 21:50.

- Councillor Woodbridge proposed an amendment to the final sentence of recommendation 5,

*'To require the Head of Planning Policy and Economic Development, in collaboration with the Chair of LPPC, to determine the number and timing of additional LPPC meetings to be scheduled. These meetings are to *update on the local plan examination.*'*

Councillor Neale seconded the proposed amendment.

The Committee voted (3 for, 5 against, and the Chair not voting) against the proposed amendment and the motion was lost.

Following consideration, the Committee resolved that the recommendations of the motion were **NOT** agreed.

The votes on the recommendations were as follows:

With 4 votes for the recommendation, 5 votes against the recommendation and the Chair not voting the following recommendation was **NOT** agreed:

(2) Withdraw delegation of authority item P7:

'To propose changes and corrections to the Local Plan (2022-2040) and supporting documents, including policy updates, editorial, typographical and grammatical errors, during and following the publicity period, plan submission and during examination.'

With 4 votes for the recommendations, 5 votes against the recommendations and the Chair not voting the following recommendations were **NOT** agreed:

- (1) The LPPC will ensure that all development plan documents to be submitted to the Inspector, including but not limited to amendments to development plan documents and addendums to development plan documents, are reviewed and approved for release by the LPPC, in compliance with PaCPA para 20 and the committee's Terms of Reference, prior to submission to the Inspector.**

Further to ensure that, where such document are required to be approved by Full Council under the terms of the constitution, that this approval is also first obtained prior to submission to the Inspector.

- (3) Documents COUD_020 and COUD_021 will be presented to the LPPC by the Head of Planning Policy and Economic Development as soon as possible, for its review, challenge and approval for submission to the Inspector, subject to any amendments deemed appropriate and necessary by the committee.**

If, as expected, amendments result from the review, revised versions of COUD_020 and COUD_021 will be submitted to the Inspector, together with a covering letter explaining the need for the changes and setting out the proposed next steps to progress the Local Plan in a timely manner. A draft covering letter will therefore also be presented to LPPC by the Head of Planning Policy and Economic Development, at the same meeting, for review and approval.

(4) The committee will, prior to submission of the specific documents required by the Inspector in her letter of 12 February 2026:

- i. Having considered the updated content of COUD_020 and COUD_021 resulting from item 3, above, the LPPC will determine and agree which additional urban and Green Belt sites, if any, the council intends to recommend for inclusion in the Local Plan. These decisions will be made with full consideration of, and alignment with, the council's overarching strategy and objectives for the Local Plan.
- ii. Direct officers to prepare revised versions of the following documents in accordance with the decision made in i), above:
 - a. Housing trajectory and 5-year supply position
 - a. Sustainability Appraisal
 - a. Habitats Regulations Assessment
 - a. Transport Assessment
 - a. Infrastructure Delivery Plan
 - a. Any other documents required to be updated to take into account the council's conclusions on which urban and Green Belt sites they propose to allocate within the Local Plan
- iii. Review the revised documents prepared under ii), above, and approve submission versions.
- iv. For items ii) a), b) and c), consider and recommend the submission versions of these documents for approval to Full Council.

With 4 votes for the recommendation, 5 votes against the recommendation and the Chair not voting the following recommendation was **NOT** agreed:

- (5) To require the Head of Planning Policy and Economic Development, in collaboration with the Chair of LPPC, to determine the number and timing of additional LPPC meetings to be scheduled. These meetings are to enable the thorough and effective review of any and all development plan documents prior to submission to the Inspector or recommendation to Full Council.**

The meeting began at 7.30 pm and ended at 9.57 pm

COUNCILLOR PETER O'DONOVAN (CHAIR)

**Minutes of the Meeting of the LICENSING AND PLANNING POLICY COMMITTEE
held at the Council Chamber, Epsom Town Hall on 16 June 2026**

PRESENT -

Councillor Peter O'Donovan (Chair); Councillor Neil Dallen (Vice-Chair); Councillors Steve Bridger, Julian Freeman, Rob Geleit, Alex Coley (as nominated substitute for Councillor James Lawrence), Phil Neale, Kieran Persand, Humphrey Reynolds and Clive Woodbridge

Absent: Councillor James Lawrence

Officers present: Rod Brown (Head of Housing and Community), Paul Holliday (Principal Licensing Officer) and Phoebe Batchelor (Democratic Services Officer)

1 QUESTIONS AND STATEMENTS FROM THE PUBLIC

No public questions or statements were received before the deadline.

A Member of the Public submitted questions regarding agenda item 3, which were received after the public questions deadline. A response to the questions will be provided via email.

2 DECLARATIONS OF INTEREST

Councillor Neil Dallen declared they are a member of Epsom Business Improvement District (BID). He confirmed that he maintained an open mind in respect to the agenda business.

3 MINUTES OF THE PREVIOUS MEETING

The Committee confirmed as a true record the Minutes of the Meeting of the Committee held on 10 March 2026 and authorised the Chair to sign them.

4 COUNCILLOR AGENDA REQUEST - CUMULATIVE IMPACT ZONE

The Committee considered a Councillor's request to add an agenda item *"To explore and review the necessary work for a Cumulative Impact Zone regarding licensed premises in Epsom Town Centre."*

The following matters were considered:

- a) **Time.** The Chair asked how long it would take to commence a Cumulative Impact Assessment and deliver a Cumulative Impact Policy if the Committee chose to go down that route. He also noted that the request for the funding would need to go to Strategy & Resources Committee. The Principal Licensing Officer informed the Committee that the quote received a few years ago to complete a CIA was roughly £25,000. He estimated it would take a few months to complete a scoping exercise and go through a tendering and procurement process. The work would then need to be undertaken which would involve night time visits on at least three occasions, surveys of local businesses, conversations with the police, environmental health, and other responsible authorities, which could take a further few months. Once the work is complete, the data and recommendation would then need to be interpreted to produce a report to go back to the Committee. The Committee would need to decide if there was sufficient evidence to warrant considering a CIP and if so, adjust the Licensing Policy as necessary. If the Licensing Policy was proposed to be changed, there would need to be a full public consultation, normally lasting 12 weeks. The public consultation results would then need to be brought back to Licensing and Planning Policy Committee to decide whether to recommend the update Licensing Policy is adopted by Full Council. The Principal Licensing Officer explained it would unlikely be completed before vesting day.
- b) **Consultees.** A Member of the Committee asked who was consulted during the Licensing Policy public consultation and how were they consulted. The Principal Licensing Officer informed the Committee that inovem was the site that hosted the public consultation, which has been used for the Local Plan Reg 18 and 19 consultations. He explained that emails had been sent to all Councillors, Residents Associations, representatives of licenced businesses and trade bodies, the police, and public health among other consultees. He informed the Committee that it was displayed on the Council's website and put out on all the Council's social media platforms. The Council's communications team put out messages on social media over the 12-week consultation period. He explained the budget did not allow for a letter to be sent to each business and resident. The Member asked if hard copies were provided in any of the Council's public buildings, as required under the Equality Act. The Principal Planning Officer explained there were hard copies available at the Town Hall and Epsom Library.
- c) **Croydon and Merton.** A Member of the Committee raised that two nearby areas who have CIPs are Croydon and Merton. He commented that Epsom is not similar to nor should be compared to Croydon and Merton.
- d) **Item request.** A Member of the Committee asked Councillor Coley why they requested this item come to the Licensing and Planning Policy Committee. Councillor Coley explained that he learned about the special stress area as a member of the committee and sat on a licensing panel hearing where he was under the impression the special stress area

wouldn't make a great deal of difference. He explained that the Surrey Police consultation response gave the impression that there are no problems or complaints in Epsom Town Centre. He stated that the special stress area simply says that operators will be expected to 'pay special attention when drawing up' etc. and queried how operators demonstrate special attention. He explained his concerns, after speaking to local residents and the Business Improvement District, that Epsom Town Centre has gotten more out of control, with more incidents occurring at night. He explained another frustration was that the consultation response gave the impression that the existing licenced premises would be upset with a CIP, however, a CIP would not negatively impact their business because it would make it more difficult for competitors to get licensed. He explained he would like the possibility of commencing a CIA to be explored and reviewed as he does not believe the special stress area will be sufficient.

- e) **Town Centre.** A Member of the Committee raised that they volunteer as a Street Pastor during the night in Epsom Town Centre. He expressed support for the professionalism of the door staff outside most of the nightclubs and bars in Epsom Town Centre. He explained that Epsom Town Centre is becoming increasingly quiet and some late-night establishments are closing or struggling due to lack of patrons. Therefore, they do not think a CIA is necessary or the cost of it can be justified. The Vice Chair echoed these comments regarding Epsom Town Centre.
- f) **Recent events.** A Member of the Committee raised that due to recent events in Epsom Town Centre, the concerns raised by Councillor Coley should not be taken lightly. He asked Councillor Coley what exploring and reviewing a CIA entails. Councillor Coley explained he left what exploring and reviewing entailed up to council officers to decide what to offer members. He explained that exploring a CIA could be a briefing evening with a Licensing officer from Surrey Police, a public meeting, or the officer report. The Member asked the Committee and officers if any further action towards exploring or reviewing a CIA would be taken. The Chair stated that the report in front of Members sets out why a CIA and CIP are not necessary for Epsom Town Centre and no further exploration of the topic is needed at present. He explained that the updated policies, discussed and approved at Committee in March 2026, also provide sufficient protection and guidance for licensing matters.
- g) **Data.** A Member of the Committee asked if there is data to support the comments suggesting the Epsom Town Centre is getting quieter and safer. The Principal Licensing Officer explained that the in the initial report to consult on the licensing policy, crime and disorder statistics were obtained in relation to Epsom Town Centre. This data showed there is elevated levels of ASB and violent crime in Epsom Town Centre. However, he caveated by highlighting that Epsom is an urban town centre, and that would be expected. Officers identified particular areas where crime was heightened, and following discussions with members, it

resulted in the special stress area. That data is provided as a link in the original licensing policy report.

- h) **Cumulative Impact Policy.** A Member of the Committee asked if the Council needs to have a CIP in place. The Principal Licensing Officer explained there is no legal requirement to have a CIP. The Member asked if a CIP is in place, does it need to be updated every five years. The Principal Licensing Officer explained it needs to be updated every three years.
- i) **Early Morning Alcohol Restriction Order.** A Member of the Committee raised that in the statement of licencing policy, there is an Early Morning Alcohol Restriction Order (EMRO), and asked if this is something the council could consider. The Principal Licensing Officer explained they had not heard of a local council having one and believed it would be disproportionate for the area.
- j) **Licensing.** A Member of the Committee raised that they believe licensing works well in Epsom and Ewell. He expressed support for the fact that if an objection is received to a licensing application, it comes to a hearing.

Following consideration, the Committee resolved;

Unanimously to:

- 1) Consider the agenda item in accordance with the Council's Constitution.**

(8 for, 2 abstaining) to:

- 2) Endorse the officer recommendation that no action should be taken following consideration of this report.**

The meeting began at 7.30 pm and ended at 8.02 pm

COUNCILLOR PETER O'DONOVAN (CHAIR)

TANDRIDGE DISTRICT COUNCIL LOCAL PLAN 2024-2044: SPATIAL DEVELOPMENT STRATEGY CONSULTATION (REGULATION 18)

Head of Service: Ian Mawer, Head of Planning Policy and Economic Development

Report Author Ian Mawer, Wai-Po Poon

Wards affected: (All Wards);

Urgent Decision? No – note this relates to call-in and not the use of the Appendix 2 urgent decision process.

Appendices (attached): Appendix 1 – Urgent Decision DEC 162
Appendix 2 – Response to Tandridge District Council Regulation 18 Consultation (July-Sept 2026)

Summary

Tandridge District Council (TDC) recently consulted on a draft Local Plan relating to Spatial Strategy Options (Regulation 18). As TDC will become part of the new East Surrey Unitary Authority from 1 April 2027 it is important that the Council provided a formal response to the consultation.

Recommendation (s)

The Committee is asked to:

- (1) Note the Councils response to the Tandridge District Council Local Plan Spatial Development Strategy Consultation (Regulation 18) that was taken and submitted following Urgent Decision 162.**

1 Reason for Recommendation

- 1.1 It is important that the Council responds to neighbouring authority statutory planning policy consultations within the specified consultation period to enable our comments to be considered.
- 1.2 The consultation period closed on the 2 September 2026 and therefore the response was issued an urgent decision.

- 1.3 This report to the committee notes the decision taken by the Chief Executive and / or Directors on the grounds of urgency, in compliance with the requirements of the Constitution.

2 Background

- 2.1 Tandridge District Council is located South East of Epsom & Ewell Borough Council and although not directly neighbouring the Borough will form part of East Surrey Unitary Authority in the Local Government Reorganisation.
- 2.2 Tandridge District Council is preparing a Local Plan under the new Planning system set out in the Levelling Up and Regeneration Act 2023. The reforms include streamlining the process of Local Plan making to 30 months. Their timetable is set out in their Local Development Scheme which suggests submission by the end of the year, Examination between Jan-Sept 2027 and adoption by November 2027.
- 2.3 The current consultation forms part of a Regulation 18 consultation. An earlier Regulation 18 consultation was held between January and March 2026 seeking views on a various matters including vision and priorities. This recent consultation held between 6 July- 2 September 2026 takes the responses from the earlier consultation and presents four development growth options (including a preferred option (strategy) and identifies themes for potential strategic policies.
- 2.4 The preferred spatial strategy is for capacity-led dispersed growth across settlements throughout the district, plus a new strategic development site of around 2,250 dwellings and supporting infrastructure at Redhill Aerodrome, subject to further technical work. It is noted that the scale of development is not identified but that it will be determined by their evidence base.
- 2.5 The Council's response is not specific to any parts of the document but notes the contents and has acknowledged the difficulties Tandridge District Council face particularly during the transitional period of Planning reforms as well as Local Government Reorganisation. The response also clarifies that Epsom and Ewell Council is unable to accommodate any unmet needs arising from other Local Authorities.

3 Risk Assessment

Legal or other duties

- 3.1 Equality Impact Assessment
 - 3.1.1 None
- 3.2 Crime & Disorder
 - 3.2.1 None

3.3 Safeguarding

3.3.1 None

3.4 Dependencies

3.4.1 None

3.5 Other

3.5.1 None

4 Financial Implications

4.1 None arising from this report.

4.2 **Section 24 considerations:** None.

4.3 **Section 151 Officer's comments:** There are no immediate financial implications arising from the recommendation to note the Council's response to the consultation. However, the emerging Tandridge Local Plan may have strategic investment decisions across East Surrey following Local Government Reorganisation. Therefore, continued engagement will help ensure that any potential financial implications for the future East Surrey Unitary Authority are identified and managed at an early stage.

5 Legal Implications

5.1 The scheme of delegation sets out that the Chief Executive and Directors are authorised to take decisions on grounds of urgency regarding matters which would otherwise be reserved for determination by a Committee or Council. A matter can be deemed urgent if, in the reasonable opinion of the officer concerned, a delay would seriously prejudice the interest of the Council or of the public and it is not practicable to convene a quorate meeting of the relevant decision-making body in sufficient time to take the decision.

5.2 Since the last meeting of the Committee, one urgent decision has been taken by the Director of Environment, Housing and Regeneration in consultation with the Chair, Cllr Peter O'Donovan, and published in Member News in line with the Council's Constitution, Appendix 2, Paragraph 3.1. iii.

5.3 The decision form is attached as Appendix 1 to this Report; Appendix 2 (as also attached) provides a copy of the Council's response as submitted before the deadline.

5.4 **Legal Officer's comments:** None arising from the content of this report.

6 Policies, Plans & Partnerships

- 6.1 **Council's Key Priorities:** None
- 6.2 **Service Plans:** The matter is not included within the current Service Delivery Plan.
- 6.3 **Climate & Environmental Impact of recommendations:** None
- 6.4 **Sustainability Policy & Community Safety Implications:** None
- 6.5 **Partnerships:** The Council is a Specific Consultation Body with relevant local authorities (in or adjoining the area). Whilst TDC does not immediately adjoin the boundaries of Epsom and Ewell, it will become part of the new East Surrey Unitary Authority from 1 April 2027. It is therefore important that we engage with the Council in developing their Local Plan.
- 6.6 **Local Government Reorganisation Implications:** TDC will become part of the new East Surrey Unitary Authority from 1 April 2027. At the current time there is uncertainty as to whether from the 1 April 2027 the new East Surrey Authority will decide to continue with local plans based on existing local authority geographies or whether the authority will decide to start a new East Surrey Local Plan for the entire geography.
- 6.7 As Tandridge District Council and Epsom & Ewell Borough Council will form part of the new East Surrey Unitary Authority from April 2027, decisions taken through the preparation of individual local plans may influence the future strategic planning framework, infrastructure requirements and growth distribution across the wider East Surrey area. Early engagement is therefore important to support effective transition arrangements and the development of a coherent planning strategy for the new authority.

EPSOM AND EWELL BOROUGH COUNCILDECISIONS/ACTIONS TAKEN IN CONSULTATION WITH COMMITTEE CHAIR

Officer requesting authorisation: Ian Mawer

Date of request: 19/08/2026

Committee concerned: Licencing and Planning Policy Committee

Subject: EEBC response to Tandridge District Council Regulation 18 Local Plan consultation

Reason why this decision/action cannot wait until the next scheduled committee:

The next Committee is scheduled for the 22 September 2026 which is after the consultation response deadline of the 2 September 2026.

When the decision/action is needed by: 2 September 2026.

Proposed action/decision:

The Head of Planning Policy and Economic Development will prepare and, following consultation with the Chair of the Licencing and Planning Policy committee, submit a response to the Tandridge Local Plan (Regulation 18) during the statutory consultation period.

Finance consulted: 19/08/2026

Finance comments: None

Legal consulted: 19/08/2026

Legal comments: The delegated authority for officers to respond to consultations (Appendix 2.1, section 10 - CG2) does not extend to this example, hence the need for a committee decision.

Considered the following (Para 3.2 Appendix 2 of the Council's Constitution).

Consultation views: Chair of LPPC Consulted

Range of options considered: The only alternate option was not to respond the consultation. However, we would not be fulfilling our duties as a statutory consultee if we were to do this, so this was not considered to be a realistic option.

Staffing, financial, and legal implications: None

Policy framework, equalities, climate change or wellbeing implications: None

Risks: None

Other guidance: n/a

Constitution, contract and financial procedures and regulations: None

The need to secure Best Value: n/a

Chair consulted: Peter O'Donovan

Date: 18/08/2026

Views of the Chair and/or Vice Chair:

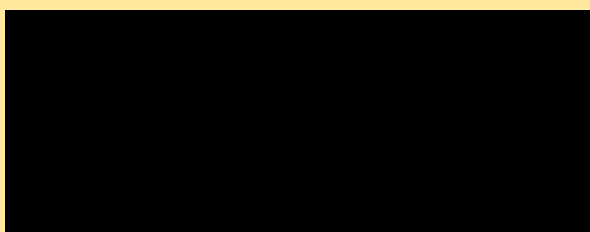
Happy for the response to be sent.

Name: Ian Mawer

Date: 19/08/2026

Decision/action authorised by: Cagdas Canbolat

Signature:



Date: 02/09/2026

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Tandridge District Council
Planning Policy
Council Offices
8 Station Road East
Oxted
RH8 0BT

Town Hall, The Parade
Epsom KT18 5BY
Number (01372) 732000
www.epsom-ewell.gov.uk

Contact: Ian Mawer
Direct Line: 01372 732402
Email: imawer@epsom-ewell.gov.uk

2 September 2026

Dear Planning Policy

Tandridge District Council Local Plan 2024-2044: Spatial Development Strategy Consultation (Regulation 18)

Thank you for consulting Epsom and Ewell Borough Council (EEBC) on the Spatial Development Strategy of the emerging Tandridge local plan.

EEBC's emerging Local Plan 2022-2040, is at Examination stage with the hearings having concluded on the 2 July 2026. We anticipate consulting on the Inspectors Proposed Main Modifications before the end of the year.

Local Government Reorganisation (LGR)

We note that you are preparing your Local Plan under the new system set out in the Levelling up and Regeneration Act, which intends to streamline local plan production to 30 months and that you have recently published a Local Development scheme setting out the timetable to meet this requirement.

As you have highlighted on p6 of your consultation document the government has confirmed that from the 1 April 2027, Surrey County Council and the existing 11 boroughs and district authorities will be replaced by two unitary authorities East Surrey and West Surrey.

We note that at the current time there is uncertainty as to whether from the 1 April 2027 the new East Surrey Authority decide to continue with local plans based on existing local authority geographies or whether the authority will decide to start a new East Surrey Local Plan for the entire geography. There is also the added complexity of the introduction of Spatial Development Strategies (SDS) as a new higher tier of planning.

Comments on the Reg 18 consultation

This Regulation 18 consultation document contains a revised vision and set of objectives in addition to identifying four potential development options and a preferred strategy.

The preferred spatial strategy is for capacity-led dispersed growth across the district, plus a new strategic development site of around 2,250 dwellings and supporting infrastructure at Redhill Aerodrome, subject to further technical work. We note that the scale of development at individual settlements will be determined by the evidence base.

We note, that like Epsom and Ewell, your housing requirement is based on the government's standard method which has resulted in a substantive increase compared to the scale of growth previously planned for and that if you were to meet the standard method in full for Tandridge, this would equate to 12,300 homes over a 15 year period.

In addition, we note that your evidence base indicates the need for an additional 17ha of employment land over the plan period and 143 gypsy pitches and 69 plots for travelling showpeople by the end of the plan period.

We appreciate that like Epsom and Ewell, Tandridge is a constrained district and that meeting the identified development needs will be challenging considering the green belt, national landscapes and infrastructure constraints. We note that further evidence is being produced to support the next iteration of the Local Plan.

Whilst we do not have any specific comments on the options presented, we wish to highlight that Epsom and Ewell Council is unable to accommodate any unmet needs arising from other Local Authorities.

We note that the next iteration of the Local Plan (Regulation 19) will contain Strategic Policies that sit under 11 different themes.

To conclude, we recognise the challenges for TDC of not having an up-to-date local Plan in place and welcome the opportunity to comment on this Regulation 18 Local Plan. EEBC is unable to meet any unmet needs arising from TDC (or other local authorities) and considers that at the current time there is uncertainty as to how the new East Surrey Authority will decide to progress local plans based on existing local authority geographies that have not been submitted.

Yours sincerely

I Mawer

Ian Mawer
Head of Planning Policy and Economic Development
Epsom and Ewell Borough Council

CONSULTATION ON THE PUBLICATION DRAFT OF THE KINGSTON LOCAL PLAN (REGULATION 19)

Head of Service:	Ian Mawer, Head of Planning Policy and Economic Development
Report Author	Susie Legg, Ian Mawer
Wards affected:	(All Wards);
Urgent Decision?	No – note this relates to call-in and not the use of the Appendix 2 urgent decision process.
Appendices (attached):	Appendix 1 – Urgent Decision DEC 161 Appendix 2 – Response to the London Borough of Kingston Council Regulation 19 Consultation (July-Sept 2026)

Summary

Epsom and Ewell Borough Council are a statutory consultee on Local Plans from neighbouring authorities. The London Borough of Kingston recently consulted on a publication draft Local Plan (Regulation 19 Stage). This is the final consultation stage before the plan is submitted for independent examination.

Recommendation (s)

The Committee is asked to:

- (1) Note the Councils response to the Kingston Local Plan Regulation 19 Consultation that was taken and submitted following Urgent Decision 161.**

1 Reason for Recommendation

- 1.1 It is important that the Council responds to neighbouring authority statutory planning policy consultations within the specified consultation period to enable our comments to be considered.
- 1.2 The consultation period closed on the 4 September 2026 and therefore the response was issued an urgent decision.

- 1.3 This report to the committee notes the decision taken by the Chief Executive and / or Directors on the grounds of urgency, in compliance with the requirements of the Constitution.

2 Background

- 2.1 Development of the Kingston Local Plan began in 2019, and it has now reached the Regulation 19 consultation stage, which ran between 6 July and 4 September 2026. Following this final consultation stage, the Royal Borough of Kingston Upon Thames expect to submit the plan to the Planning Inspectorate for Examination by December 2026. Given the timings of the consultation, the Council has submitted a response by the deadline via an urgent decision (ref: DEC 161). The Council's submitted response is available in Appendix 1.
- 2.2 The Council's response focuses on the cross-boundary issues which have been the subject of ongoing Duty to Cooperate (DtC) discussions between the two authorities. As part of the DtC, the Council has two Statements of Common Ground signed with the Royal Borough of Kingston Upon Thames, the first in March 2025 in relation to the Epsom & Ewell Local Plan and the second in August 2026 in relation to the Kingston Local Plan. It should be noted that the legal requirement for the DtC no longer exists following changes introduced in March 2026 through the Levelling up and Regeneration Act 2023. However there is still a requirement under the new NPPF (August 2026) for cooperation between plan making authorities on cross boundary issues, demonstrated through Statements of Common Ground ([NPPF, page 13, PM10: Maintaining cooperation between plan making authorities and PM11: Demonstrating cooperation between plan making authorities](#)).
- 2.3 The Council's Regulation 19 response to the Kingston Local Plan specifically comments on housing, employment, Gypsy and Traveller accommodation and infrastructure, and is generally supportive of the approach taken in the Kingston Local Plan. It recognises the challenges faced by each authority in meeting identified needs and concludes to state that the Council does not have any soundness concerns and will continue to engage constructively as the Kingston Local Plan progresses.

3 Risk Assessment

Legal or other duties

- 3.1 Equality Impact Assessment
 - 3.1.1 None
- 3.2 Crime & Disorder
 - 3.2.1 None

3.3 Safeguarding

3.3.1 None

3.4 Dependencies

3.4.1 None

3.5 Other

3.5.1 None

4 Financial Implications

4.1 There are no direct financial implications arising from the recommendation to note the Council's response to the Kingston Local Plan Regulation 19 consultation.

4.2 **Section 24 considerations:** None.

4.3 **Section 151 Officer's comments:** There are no immediate financial implications arising from the recommendation, however planning policies adopted by neighbouring authorities may have implications for service demand that affect Epsom and Ewell residents. Continued engagement helps ensure that cross-boundary matters are appropriately considered and managed. Legal Implications

4.4 As an adjoining authority, the Council is one of the 'specific consultation bodies' in relation to the Royal Borough of Kingston's Local Plan under the Town and Country Planning Regulations 2012.

5 Legal Implications

5.1 The scheme of delegation sets out that the Chief Executive and Directors are authorised to take decisions on grounds of urgency regarding matters which would otherwise be reserved for determination by a Committee or Council. A matter can be deemed urgent if, in the reasonable opinion of the officer concerned, a delay would seriously prejudice the interest of the Council or of the public and it is not practicable to convene a quorate meeting of the relevant decision-making body in sufficient time to take the decision.

5.2 Since the last meeting of the Committee, one urgent decision has been taken by the Director of Environment, Housing and Regeneration in consultation with the Chair, Cllr Peter O'Donovan, and published in Member News in line with the Council's Constitution, Appendix 2, Paragraph 3.1. iii.

5.3 The decision form is attached as Appendix 1 to this Report; Appendix 2 (as also attached) provides a copy of the Council's response as submitted before the deadline.

5.4 Legal Officer's comments: None other than as set out above.

6 Policies, Plans & Partnerships

6.1 Council's Key Priorities: None

6.2 Service Plans: The matter is not included within the current Service Delivery Plan.

6.3 Climate & Environmental Impact of recommendations: None

6.4 Sustainability Policy & Community Safety Implications: None

6.5 Partnerships: The Council is a statutory consultee with neighbouring planning authorities and has engaged constructively with Royal Borough of Kingston throughout the development of our Local Plans.

6.6 Local Government Reorganisation Implications: None

EPSOM AND EWELL BOROUGH COUNCIL

DECISIONS/ACTIONS TAKEN IN CONSULTATION WITH COMMITTEE CHAIR

Officer requesting authorisation: Ian Mawer

Date of request: 19/08/2026

Committee concerned: Licencing and Planning Policy Committee

Subject: EEBC Response to London Borough of Kingston Regulation 19 pre submission Local Plan consultation

Reason why this decision/action cannot wait until the next scheduled committee:

The next Committee is scheduled for the 22 September 2026 which is after the consultation response deadline of the 4 September 2026

When the decision/action is needed by: 4 September 2026

Proposed action/decision:

The Head of Planning Policy and Economic Development will prepare and, following consultation with the Chair of the Licencing and Planning Policy committee, submit a response to the Kingston Local Plan (Regulation 19) during the statutory consultation period.

Finance consulted: 19/08/2026

Finance comments: None

Legal consulted: 19/08/2026

Legal comments: The delegated authority for officers to respond to consultations (Appendix 2.1, section 10 - CG2) does not extend to this example, hence the need for a committee decision.

Considered the following (Para 3.2 Appendix 2 of the Council's Constitution).

Consultation views: Chair of LPPC Consulted

Range of options considered: The only alternate option was not to respond the consultation. However, we would not be fulfilling our duties as a statutory consultee if we were to do this, so this was not considered to be a realistic option.

Staffing, financial, and legal implications: None

Policy framework, equalities, climate change or wellbeing implications: None

Risks: None

Other guidance: n/a

Constitution, contract and financial procedures and regulations: None

The need to secure Best Value: n/a

Chair consulted: Peter O'Donovan

Date: 18/08/2026

Views of the Chair:

Happy for the response to be sent.

Name: Ian Mawer

Date: 19/08/2026

Decision/action authorised by: Cagdas Canbolat

Signature:



Date: 02/09/2026

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The Royal Borough of Kingston upon Thames,
Planning Policy
Guildhall 2,
High Street,
Kingston upon Thames,
KT1 1EU

Town Hall, The Parade
Epsom KT18 5BY
Number (01372) 732000
www.epsom-ewell.gov.uk

Contact: Ian Mawer
Direct Line: 01372 732402
Email: localplan@epsom-ewell.gov.uk

2 September 2026

Dear Planning Policy

Re: Consultation on the Publication Draft of the Kingston Local Plan (Regulation 19)

Thank you for consulting Epsom & Ewell Borough Council (EEBC) on the above document. The Council has focused its response on the policies of the Plan that will and/or are likely to have cross boundary implications for our Borough's and have been the subject of our ongoing Duty to Co-operate discussions.

Status of EEBC Local Plan

EEBC's Local Plan is currently at an advanced stage of examination, having been submitted in March 2025 for examination, with public hearings being held across August, September and October 2025 and a further additional public hearing on 2 July 2026.

The next stage will be the statutory consultation on the Inspectors proposed main modifications which are anticipated to take place in Autumn 2026.

EEBC & The Royal Borough of Kingston Upon Thames (RBK) have engaged constructively throughout their respective Local Plan processes reflected through Statements of Common Ground, the most recent being agreed in August 2026.

RBK Publication Draft of the Local Plan

Housing

The Publication Draft of the Local Plan seeks to deliver at least 19,000 homes across the plan period (2025/26 to 2042/43). Growth is to be prioritised on brownfield land within urban areas and other highly accessible locations, followed by sustainable Grey Belt land and specific underutilised brownfield sites within Metropolitan Open Land. EEBC understands through previous RBK consultations and discussions via the Duty to Co-operate that RBK faces significant challenges in terms of its housing land supply.

The plan contains some allocations for the development of non-brownfield land, and it is stated in paragraph 6.4 that the housing requirement is 'capacity led'. We note that RBK has acknowledged the publication of the Draft London Plan on 16 July 2026 and have stated that they are reviewing this document in detail to fully understand the implications for the borough and Local Plan.

EEBC faces similar challenges in terms of its housing land supply and, as per previous communications with RBK, cannot assist with meeting housing needs arising from outside of the borough. EEBC is therefore supportive of a 'capacity led' approach to identifying the housing requirement.

It is noted that RBK intend the delivery of homes to be through a 'stepped housing trajectory' to align with the phased availability of land and infrastructure. The peak of delivery is anticipated to be in years 6 to 10 of the plan period. EEBC considers a stepped trajectory to be an appropriate approach to ensure housing and infrastructure delivery align.

Employment

Through its Duty to Co-operate discussions, EEBC is aware of the need for additional employment land within RBK. The policy approach set out in the Economy and Town Centres chapter supports the provision of new employment premises and directs such uses towards the designated employment locations, while protecting existing employment uses. EEBC acknowledges the challenge RBK faces in terms of competing land uses with limited site availability and broadly supports the approach taken.

Gypsy and Traveller Accommodation

RBK has identified a need for at least 52 additional Gypsy and Traveller pitches over the ten-year period from 2022/23 to 2031/32. The challenge in meeting this need is recognised by EEBC. To address this need, a number of the larger allocations within the plan require an element of permanent traveller pitch provision, while policy KH8 requires the provision of approximately 0.2ha of permanent traveller pitch provision on sites exceeding 2 hectares and is supportive of the expansion of existing sites subject to a number of criteria being satisfied. EEBC is broadly supportive of this approach, although the number of pitches to be delivered through the allocations is unclear.

Infrastructure

EEBC is supportive of RBK's approach in ensuring that development is supported by appropriate infrastructure.

To conclude, EEBC do not have any soundness concerns in relation to the Publication Draft of the Kingston Local Plan and welcome the opportunity to continue engaging constructively as the Local Plan Progresses.

Yours sincerely

I Mawer

Ian Mawer
Head of Planning Policy and Economic Development
Epsom and Ewell Borough Council

AUTHORITY MONITORING REPORT 2025-2026

Head of Service:	Ian Mawer, Head of Planning Policy and Economic Development
Report Author	Mary Bryson
Wards affected:	(All Wards);
Appendices	Appendix 1 – Epsom and Ewell Authority Monitoring Report 2025/26

Summary

The Authority Monitoring Report (AMR) is a factual report that has two purposes; to monitor progress towards new Local Development Documents and to monitor the effectiveness of key policies set out in Local Development Documents.

Recommendation (s)

The Committee is asked to:

- (1) Note the content of the Authority Monitoring Report for the 2025/26 Monitoring year and agree to it being published.**

1 Reason for Recommendation

- 1.1 The Authority Monitoring Report (AMR) is prepared for each financial year (April – March). The latest AMR covers the period 1 April 2025 to 31 March 2026 and is contained in Appendix 1.
- 1.2 Local planning authorities are required by law to prepare and publish an AMR at least annually.

2 Background

- 2.1 The Authority Monitoring Report contributes to the suite of documents that comprise and support the Development Plan for Epsom and Ewell Borough Council. The purpose of the AMR is to review the progress of plan-making and the effectiveness of key Local Plan policies.
- 2.2 Although the role of the AMR is to monitor adopted Local Plan policies, housing supply is a fundamental aspect of monitoring and where a Local Plan is considered out of date the national standard method for calculating housing requirements applies.

- 2.3 One of the purposes for monitoring your adopted Local Plan policies is to flag when policies are being ineffective and when a review may be necessary. The Council has already acknowledged the need for a new up to date Local Plan and has progressed the Local Plan 2022-2040 which is currently at Examination Stage following submission in March 2025.
- 2.4 During the monitoring year the Council participated in the Examination Hearings. Stage 1: August 2025, Stage 2: September and October 2025.
- 2.5 Following the hearings, in agreement with the Inspector, two pieces of work were undertaken. These were submitted to the Inspector and subsequently published in January 2026. In February 2026, the Planning Inspector requested further work to assess the suitability of potential additional sites for the Local Plan to enable the examination to proceed. The Council undertook this additional work with a public consultation on the additional evidence work at the planning inspectors request and a further hearing date was organised. This work was published on our [Examination Library](#) and will be considered through the inspectors Main Modifications
- 2.6 Until the new Local Plan 2022-2040 is adopted, we will meet our statutory responsibilities in preparing the AMR and will produce a detailed AMR once up to date policies are adopted.
- 2.7 The AMR highlights that during the monitoring year, 37 homes were completed in the borough, none of which were affordable homes.
- 2.8 Local Authorities in England are required to report on their five-year housing land supply position. The AMR demonstrates that the Council cannot demonstrate a five-year housing land supply.
- 2.9 During the monitoring year, the first neighbourhood plan was made (adopted) in Epsom and Ewell. The Stoneleigh and Auriol Neighbourhood Plan now forms part of the Development Plan.

3 Risk Assessment

Legal or other duties

- 3.1 Equality Impact Assessment
 - 3.1.1 None arising from this report.
- 3.2 Crime & Disorder
 - 3.2.1 None arising from this report.
- 3.3 Safeguarding
 - 3.3.1 None arising from this report.

3.4 Dependencies

3.4.1 None arising from this report.

3.5 Other

3.5.1 None arising from this report.

4 Financial Implications

4.1 None arising from this report.

4.2 **Section 151 Officer's comments:** There are no immediate financial implications arising from the recommendation to publish the Authority Monitoring Report. However, the report identifies planning policy matters that may have future financial implications for the Council, Therefore the position should be monitored so that any material financial impacts arising from these matters is considered through the annual budget process.

5 Legal Implications

5.1 The publication of an authority monitoring report is a requirement of Section 35 of the Planning and Compulsory Purchase Act 2004 (as amended by Section 113 of the Localism Act 2011).

5.2 Part 8 of the Regulation 34 of the Town and Country Planning (Local Development) (England) Regulations 2012 sets out the requirements for the contents of an AMR. Appendix 1 meets these statutory obligations.

5.3 It should be noted that during the AMR reporting period the Council could not demonstrate a five-year housing land supply. This means that the NPPF's presumption in favour of sustainable development applied during the reporting period and continues to apply moving forward.

Legal Officer's comments: None further other than as stated above .

6 Policies, Plans & Partnerships

6.1 **Council's Key Priorities:** Progressing the Local Plan towards adoption is a corporate priority.

6.2 **Service Plans:** The matter is not included within the current Service Delivery Plan.

6.3 **Climate & Environmental Impact of recommendations:** There are no climate or environmental implications from this report.

6.4 **Sustainability Policy & Community Safety Implications:** There are no policy and community safety implications from this report.

6.5 **Partnerships:** None

6.6 **Local Government Reorganisation Implications:** None



Authority Monitoring Report

1 April 2025 - 31 March 2026

Epsom & Ewell Borough Council

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1.0 Introduction

- 1.1 This Authority Monitoring Report (AMR) covers the period 1 April 2025 to 31 March 2026 for the borough of Epsom and Ewell.
- 1.2 For the purposes of this AMR, the approach taken is to meet our statutory responsibilities which are set out in the Town and Country Planning (Local Development) (England) Regulations 2012. The reasons for taking this approach are:
 - due to the age of the existing Local Plan (pre NPPF) the weight associated with the adopted policies is dependent on level of general conformity with the NPPF
 - the Council cannot demonstrate a 5-year supply of housing (see Appendix A) resulting in the NPPF's presumption in favour of sustainable development applying.
 - the effectiveness of the adopted planning policies as a result of the above two points is restricted and therefore reporting on their effectiveness is immaterial.
- 1.3 One of the purposes for monitoring your adopted Local Plan policies is to flag when policies are being ineffective and when a review may be necessary. The Council has already acknowledged the need for a new up to date Local Plan and a new Local Plan is at an advanced stage (see Section 2). Until the new Local Plan is adopted, we will seek to meet our statutory responsibilities in preparing the AMR and will produce a detailed AMR once up to date policies are adopted.
- 1.4 This AMR therefore primarily focusses on assessing progress against the current Local Development Scheme (LDS) (the Local Plan timetable), and current planning policies that include annual numbers for new homes (including affordable homes) and contains headline data on changes in employment and retail floorspace. It also includes information about Neighbourhood Plans, the Community Infrastructure Levy, and the Duty to Cooperate.
- 1.5 This AMR is prepared in accordance with Regulation 34 of the Town and Country Planning (Local Development) (England) Regulations 2012.

2.0 Local Development Scheme

- 2.1 The timetable for local development documents is set out in the Council's Local Development Scheme (LDS). This outlines the details, documents and key milestones in production of the emerging Local Plan. Table 1 overleaf shows the timetable for preparing the Local Plan.
- 2.2 The Council's latest Local Development Scheme was published on the 13 December 2024 following the publication of the [revised NPPF](#) on the 12 December 2024. The Council met key timescales leading up to the Submission of the Local Plan, however, the Examination stage has taken longer than anticipated. The Council remains committed to delivery of the Local Plan and has been working proactively to progress the Local Plan Examination.
- 2.3 During the monitoring year the Council participated in the Examination Hearings.
 - Stage 1: August 2025
 - Stage 2: September and October 2025

Following the hearings, in agreement with the Inspector, two pieces of work were undertaken. These were submitted to the Inspector and subsequently published in January 2026. In February 2026, the Planning Inspector requested further work to assess the suitability of potential additional sites for the Local Plan to enable the examination to proceed. The Council undertook this additional work with a public consultation on the additional evidence work at the planning inspectors request and a further hearing date was organised. This work was published on our [Examination Library](#) and will be considered through the Inspectors Main Modifications.

- 2.4 Further information on the Local Plan can be found on our examination webpage: <https://www.epsom-ewell.gov.uk/localplanexamination>.

Table 1 –Timetable for the preparation of the Local Plan and progress

2022/23	Q3	Oct	
		Nov	
		Dec	
	Q4	Jan	
		Feb	Reg 18 - Public Consultation
		Mar	
2023/24	Q1	Apr	Local Plan Pause
		May	
		Jun	
	Q2	Jul	
		Aug	
		Sep	
	Q3	Oct	
		Nov	
		Dec	
	Q4	Jan	
		Feb	
		Mar	
2024/25	Q1	Apr	
		May	
		Jun	
	Q2	Jul	
		Aug	
		Sep	
	Q3	Oct	
		Nov	
		Dec	
	Q4	Jan	Regulation 19 – Public Consultation
		Feb	
		Mar	Regulation 22 – Submission of Document
2025/26	Q1	Apr	
		May	
		Jun	
	Q2	Jul	Examination in Public
		Aug	
		Sep	
	Q3	Oct	
		Nov	
		Dec	
	Q4	Jan	
		Feb	
		Mar	Inspectors Report
2026/27	Q1	Apr	Adoption
		May	
		Jun	
		Jul	

Supplementary Planning Documents (SPD)

2.5 There were no plans to produce any new SPDs within the reporting year. The following SPDs are already adopted:

- Revised Developer Contributions SPD 2014
- Parking Standards for Residential Development SPD 2015
- Revised Sustainable Design Supplementary Planning Document (SPD) 2016

3.0 Implementation of policy

3.1 The Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 34) require that the AMR must identify any policies in a Local Plan that are not being implemented and explain the reasons why.

3.2 There are no policies in the current Local Plan that are not being implemented. All policies remain part of the Development Plan and are weighted accordingly, in view of conformity with the NPPF. This includes the presumption in favour of sustainable development as the council is unable to demonstrate a five year supply of housing in the reporting year (Appendix 1).

4.0 Monitoring Performance

New homes

4.1 Where Local Plan policies specify a number over a period of time in relation to net additional dwellings or net additional affordable dwellings, the AMR must report the number achieved over the monitoring period, and since the policy was adopted.

Number of new homes

4.2 Core Strategy (CS) Policy CS 7 required at least 2,715 homes to be provided between 2007 and 2022, based on an average of 181 dwellings per annum.

4.3 During this reporting year, 2025-2026, 37 new homes (net) were completed. It is important to note that over 35% of these dwellings (12 dwellings) were delivered from a major development site detailed in Table 2.

Table 2 – Housing Completions from large developments (2025-26)

Site	Net completions
140 Ruxley Lane	12

4.4 Table 3 shows the housing completions in this reporting period by Ward.

Table 3 – Completions by Ward (2025-26)

Ward	Net completions
Auriol	0
College	0
Court	1
Cuddington	0
Ewell Court	0
Ewell Village	4
Horton	0
Nonsuch	0
Ruxley	14
Stamford	0
Stoneleigh	3
Town	15
West Ewell	0
Woodcote & Langley Vale	0

4.5 Appendix B contains a map showing the location of the housing completions.

4.6 During the monitoring year 92% of housing completions were on Previously Developed Land (PDL). The units built on greenfield land included 3 houses on a vacant plot.

4.7 Table 4 overleaf shows the delivery of housing completions (net) delivered by bedroom numbers.

Table 4 – Completions by bedroom numbers and housing type

Bedrooms	Market Housing (net dwellings)	Affordable Housing (net dwellings)	All Housing (%)
1	10	0	27%
2	14	0	38%
3	10	0	27%
4	3	0	8%
5	0	0	0
Total	37	0	

4.8 Table 5 shows the number of housing completions each year for the Core Strategy period (2007-2022). It demonstrates that the Core Strategy target of a minimum of 2,715 homes has been met. However, this should be understood in the context of the NPPF requirements and national housing requirements for the borough which are significantly higher.

Table 5 - Housing Completions per year compared to Core Strategy (CS) Annual Target (2007/08 – 2021/22)

	CS Target	Total (net)	Overall Deficit/surplus
2021-22	181	117	+643
2020-21	181	169	+707
2019-20	181	193	+719
2018-19	181	165	+707
2017-18	181	160	+723
2016-17	181	294	+744
2015-16	181	169	+631
2014-15	181	195	+643
2013-14	181	234	+629
2012-13	181	517	+576
2011-12	181	289	+240
2010-11	181	251	+132
2009-10	181	103	+62
2008-9	181	221	+140
2007-8	181	281	+100
Total	2715	3358	23.7%

4.9 Table 6 shows the number of housing completions each year for the current (2025/26) and the three previous monitoring years against the housing need figure generated by the Standard Method for the monitoring year. This demonstrates that against the standard method we have a cumulative deficit of 797 dwellings for the fourth year.

Table 6 – Housing Completions per year compared to national standard method annual figure (2022/23 - 2025/26)

	SM Figure*	Total (net)	Annual Overall Deficit / Surplus
2025-26	834	37	-797
2024-25	867	112	-755
2023-24	573	139	-434
2022-23	576	317	-259
TOTAL	2850	605	-2245

- 4.10 The standard method was updated and published in the in the [Planning Practice Guide](#) (PPG) on 12 December 2024, alongside updates to the National Planning Policy Framework.
- 4.11 It should be noted that the remit of an AMR is to monitor Development Plan Policies. However, in the absence of an up-to-date Local Plan, the housing need for the borough is calculated using the national standard housing methodology. The [National Planning Policy Framework \(NPPF\)](#) contains several tests/measures that seek to increase housing delivery. This includes the Housing Delivery Test and its associated penalties. In the most recently published [Housing Delivery Test \(2023\)](#), the Council failed and as such the NPPF’s presumption in favour of sustainable development applies.

Affordable homes

- 4.12 Policy CS9 has a target that overall, 35% of new dwellings should be affordable.
- 4.13 During this reporting year there have been no affordable housing completions delivered on site (shown in Table 7) in the monitoring year. There was one residential development delivering over 10 units which specified an off-site affordable housing contribution (pursuant to a viability report) through a legal agreement.

Table 7 – Affordable housing delivery by development site (2025-26)

Affordable housing site	Tenure
0	n/a

- 4.14 Table 8 below shows the open market and affordable housing completions each year since the monitoring year 2007/2008.

Table 8 – Market and Affordable housing completions per year (2007/08 – 2025/26)

Monitoring Year	Open Market Housing (net)	Affordable Units (net)	Total Dwellings (net)	Percentage affordable
2025-26	37	0	37	0
2024-25	110	2	112	2%
2023-24	117	22	139	16%
2022-23	250	67	317	21%
2021-22	110	7	117	6%
2020-21	164	5	169	3%
2019-20	165	28	193	15%
2018-19	117	48	165	29%
2017-18	138	22	160	14%
2016-17	237	57	294	19%
2015-16	97	72	169	43%
2014-15	137	58	195	30%
2013-14	157	77	234	31%
2012-13	310	207	517	40%
2011-12	216	73	289	25%
2010-11	206	45	251	18%
2009-10	57	46	103	45%
2008-9	180	41	221	19%
2007-8	203	78	281	28%
Total	3008	955	3963	24%

New Gypsy and Traveller accommodation

- 4.15 Policy CS10 seeks to make provision for Gypsy and Traveller accommodation in the borough in accordance with the Gypsy and Traveller Accommodation Assessment (GTAA). The most up to date assessment of need in the borough is detailed in the Gypsy and Traveller, Accommodation Assessment, 2022.
- 4.16 During the monitoring year, no new pitches have been provided for Gypsy and Traveller accommodation in the borough. We are not aware of any Gypsy and Traveller pitches being lost.

Five year housing land supply

- 4.17 The NPPF requires Epsom and Ewell to identify and update annually a supply of specific deliverable sites sufficient to provide a five year supply of housing against housing requirements. In the absence of an up-to-date Local Plan, for the purposes of this calculation it is the standard housing methodology output that our housing supply is assessed against.
- 4.18 The NPPG was updated and published on the 12 December 2024 to clarify how five year housing land supply should be calculated. The Council has calculated the five year supply position to reflect this guidance. The five year housing land supply is calculated as being between 1 April 2026 and 31 March 2031. The calculation is available in Appendix A which demonstrates that the council cannot demonstrate a five-year housing land supply in the borough.
- 4.19 There is also a requirement for five years' worth of supply for Gypsy and Traveller accommodation (albeit in reference to separate national planning policy; Planning Policy for Traveller Sites). There is no five-year supply for Gypsy and Traveller accommodation in the borough.

Commercial, Business and Service floorspace

- 4.20 Use Class E (Commercial, Business and Service) was introduced in September 2020 consolidating uses previously defined in the revoked Classes A1 (retail) A2/3, B1 (offices), D1(a-b) and 'indoor sport' from D2(e). Businesses which fell within these revoked use classes are now able to change to other uses within the new Class E without the need for planning permission which means that these changes fall outside the influence of local policy.
- 4.21 Table 9 details the permissions granted during this reporting year that if implemented would result in the loss of Class E floor space.

Table 9 – Permissions resulting in the Loss of Class E Floorspace (2025/26)

Planning Application Reference	Site	Description of development
25/01110/CLP F	1A Ewell By-pass, Ewell, Surrey KT17 2PZ	Lawful Development Certificate - Proposed Use: Change of use for two rooms from Class E (formerly A2 office use) reverting to C3 residential use
25/00605/FUL	Cafe Moka, 59-60 West Square, The Ashley Centre, High Street, Epsom, Surrey, KT18 5DB	Demolition of Unit 60 and erection of replacement single storey Class E unit to The Ashley Centre (including outdoor seating area and associated works).

Table 10 details the planning permissions granted which would result in additional Class E floorspace in the borough.

Table 10 – Permissions resulting in the gain of Class E Floorspace (2025/26)

Planning Application Reference	Site	Description of development
25/00404/FUL	7 Station Approach, Stoneleigh, Surrey KT19 0QZ	Construction of a 4-storey mixed use development accommodating two ground floor commercial units (Class E) and 9 residential units (Class C3) with associated refuse storage, cycle parking and landscaping following part
25/01020/FUL	63 Dorking Road, Epsom, Surrey,	Change of use of existing premises from Drinking Establishment with Extended Food Offer to Convenience Store Class E(A), minor extension and infilling of covered area, revisions to car park layout and installation of plant

Employment floorspace

4.22 There were two applications resulting in changes within Class E use: application 25/00284/FUL, resulting in a change from a Medical Centre E(e) use to a Pharmacy E(a) and application 25/00310/FUL resulting in a change from retail sale of goods Class E(a) to a restaurant E(b).

4.23 There were two applications granted by Epsom and Ewell Borough Council which resulted in the loss in B8 floorspace. There was one application 25/00820/FUL resulting in the loss of B8 warehouse for residential development and one application 25/00404/FUL which resulted in the loss of B8 (Storage and Distribution) floorspace for Class E use. There were no planning applications resulting in changes to B2 (General Industrial) floorspace.

5.0 Neighbourhood Planning

5.1 The Localism Act 2011 introduced Neighbourhood Planning as a new way for communities to decide the future of their areas through community-led planning policy documents. The Neighbourhood Plans can include planning policies and allocations of land for different uses.

5.2 On 12 November 2020, the Councils Licensing and Planning Policy Committee approved the 'designation' of the Stoneleigh and Auriol Neighbourhood Forum for the purposes of preparing a Neighbourhood Development Plan for Stoneleigh and Auriol Neighbourhood Area.

5.3 During the Monitoring Year, the [Stoneleigh and Auriol Neighbourhood Plan](#) was:

- Subject to public consultation (Regulation 16 Stage) between 20 June 2025 and Friday 1 August 2025. The Council's Licensing and Planning Policy Committee approved a formal response to this consultation on the 3 July 2025.
- Submitted for Independent Examination on the 18 May 2025 with the Inspectors report being issued on the 23 October 2025.
- Subject to referendum relating to the adoption of the Neighbourhood Plan on the 12 February 2026 which resulted in a positive referendum result.
- Made by the Councils Licensing and Planning Policy Committee on the 10 March 2026.

6.0 Community Infrastructure Levy

6.1 The Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 34(5)) require that the AMR should contain information on the annual reporting of receipts of monies received under the CIL regime. The Council adopted its CIL Charging Schedule in 2014.

6.2 [The Infrastructure Funding Statement](#) (IFS) is an annual report which provides a summary of all financial and non-financial developer contributions relating to the Community Infrastructure Levy (CIL) and Section 106 Legal Agreements (S106) within the Borough of Epsom & Ewell.

6.3 In the monitoring period 1 April 2025 to 31 March 2026, 22 Demand Notices were issued for CIL totalling: **£1,163,284.06**.

- 6.4 During the monitoring period, at the meeting of the Council's Strategy and Resources Committee on the 25 September 2025, the Council approved up to **£1,371,053** of Strategic CIL funding be released to deliver the projects detailed in Table 11 below:

Table 11 – Strategic CIL funding requests approved in (2025/26)

Project Name	Amount awarded
Ash Dieback Essential Safety Works and Treescape Restoration	Up to £200,000
ANPR Surrey Police	Up to £36,000
B284 Ruxley Lane, West Ewell, Epsom - Road Safety Scheme	Up to £75,000
Parks recreation and play for young people and families	£1,060,053.00
TOTAL	Up to £1,371,053

- 6.5 During the monitoring period, the Council approved up to **£236,800** of Neighbourhood CIL funding be released to fund the projects detailed in Table 12 support the following projects:

Table 12 – Neighbourhood CIL funding requests approved in (2025/26)

Project Name	Amount awarded
3rd Epsom Scouts Community Building	£50,000
Cattle Arch/Under-Rail Tunnel	Up to £32,000*
Wheels for Epsom	£10,000
Horton Country Park Path Restoration	£85,000
The Library of Things	£4,800*
Linden Bridge School – Road Safety Scheme	Up to £55,000
TOTAL	Up to £236,800

*Conditional awards of funding. Further information in [September 2025 committee report](#).

7.0 Duty to Co-Operate

- 7.1 The Duty to Cooperate places a legal duty on local planning authorities and county councils in England, and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.
- 7.2 It is a requirement of the AMR to report what actions have been taken when a local planning authority has co-operated with another local planning authority, county council, or a prescribed body. In addition, the NPPF requires strategic policy making authorities to prepare and maintain a statement of common ground, documenting the cross-boundary matters being addressed and progress in co-operating to address these.
- 7.3 The Duty to Cooperate Framework was published in January 2023 which received input from partners and neighbouring councils.
- 7.4 The [Statement of Compliance \(November 2024\)](#) provides an overview of these strategic matters/issues and documents the engagement which has taken place with the DtC partners in relation to these. The [Statement of Compliance Update \(March 2025\)](#) records the DtC activities undertaken since the publication of the November 2024 Statement of Compliance up until submission of the Proposed Submission Local Plan (12 March 2025) for the Examination in Public (EiP) stage.
- 7.5 During the reporting year as part of the Local Plan Examination, a public hearing was held on 28 August 2025 specifically on the topic of Duty to Cooperate and legal compliance. Following the hearing, the Inspector wrote to the Council confirming that “the Duty to Cooperate during the preparation of the Local Plan prior to submission has been met” meaning the examination could proceed to the second stage of hearings.
- 7.6 The Council continues its close working relationship with neighbouring Councils and other Duty to Cooperate bodies demonstrated by the agreement of Statements of Common Ground (SoCG) in relation to the Proposed Submission Local Plan. To the end of the current reporting year the SoCG which relate to the Proposed Submission Local Plan number 15 in total, including one addendum. Eight SoCG plus the one addendum have been signed in the current reporting year and are

detailed in Table 13 below. A full list of all the SoCG signed by the Council is available on the Council's [Duty to Cooperate webpage](#).

Table 13 - Statements of Common Ground agreed during the monitoring period

Duty to Cooperate Body	Date Agreement Signed	Link to Statement of Common Ground
National Highways	7 May 2025	SCG08 National Highways
Historic England	14 May 2025	SCG09 Historic England
Environment Agency	16 May 2025	SCG10 Environment Agency
NHS Property Services Ltd	16 May 2025	SCG11 NHS Property Services Ltd
NHS Surrey Heartlands	23 May 2025	SCG12 NHS Surrey Heartlands
Church Commissioners for England (Horton Farm Site)	7 August 2025	SCG13 Church Commissioners for England
Church Commissioners for England (Horton Farm Site)	22 January 2026	SCG13a Church Commissioners for England Addendum
Gavil Group (Finachem House site)	8 January 2026	SCG14 Gavil Group
Jockey Club Racecourse	4 February 2026	SCG15 Jockey Club Racecourse

- 7.7 In addition to the above, the Borough Council continues to participate in Surrey-wide initiatives that contribute, at the strategic level, to the local plan making process. This work has included work with a variety of Surrey-wide bodies that include Surrey Leaders; Surrey Chief Executives; Surrey Heads of Planning and the Surrey Planning Work Group – the latter being fully focused upon local plan making.

8.0 Appendix A – Five-year housing land supply as of 1st April 2026

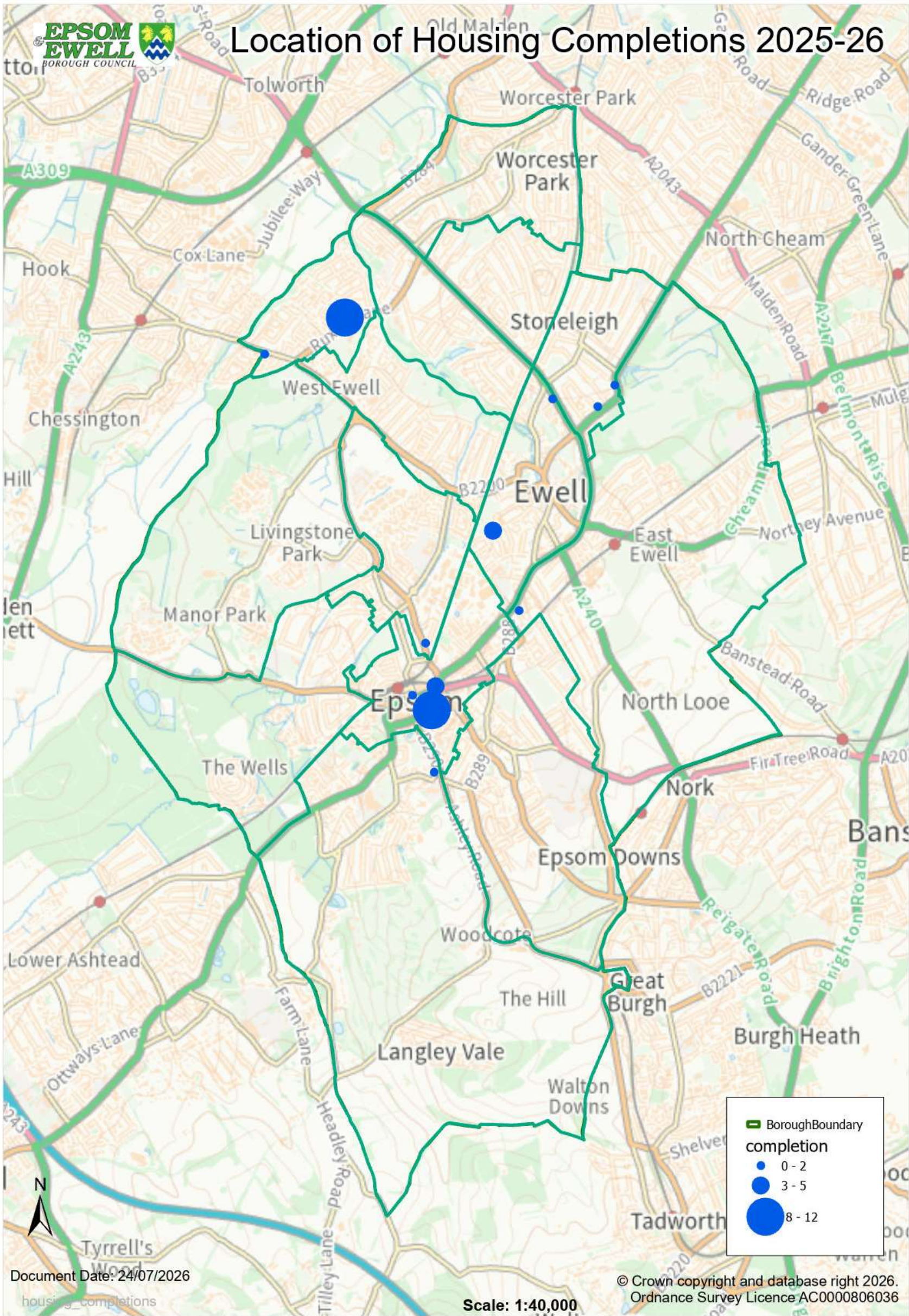
Steps	Formula	Workings
Requirement		
A		Draft Local Plan Period 2022-2040. Housing Need derived from Standard Method: 834 dwellings per annum, multiplied by 18 years is 15012 dwellings for the plan period.
B		Annual requirement is 834
C	B x 1.2	2023 HDT result means 20% uplift to requirement. This works out to be 1000.8 dwellings per annum
D	C x 5	Housing requirement for the next five years 1 April 2026- 31 March 2031 is 5004

Housing Supply		
E*		Completions 1 April 2022 to 31 March 2026 is 605 (317+139+112+37)
F*		Deficit 1 April 2022 to 31 March 2026 is 2245 (755+259+434+797)
G		Residential units under construction 574
H		Outstanding residential units with permission but not started 775
I	H x 0.95	Outstanding residential units with permission but not started (with 5 % non-implementation applied) is 736.25
J		Housing supply identified from 'Deliverable' sites in the LAA (LAA 2024 without permission) is 243-303
K	J x 0.85	Housing supply identified from 'Deliverable' sites in the LAA (with 15% non-implementation applied) is 206.55-257.55
L	35 x 2	Windfall allowance (1-4 units) for 2029-2031 is 70
M	G + I + K+ L	Total supply is 1586.8- 1637.8
N	(M/D) x 5	Five Year Housing Land Supply is 1.59-1.64
5 yr Housing land Supply		1.59 - 1.64 years supply

*The level of gain/deficit accumulated from the base date of the draft Local Plan period 2022-2040 based on the housing need derived from the standard method.

When the Council adopts a new local plan and housing requirement, the adopted housing requirement would be what the housing land supply position is calculated against.

9.0 Appendix B – Location of housing completions 2025-26



EPSOM AND EWELL LOCAL PLAN (2022-2040) PROPOSED MAIN MODIFICATIONS CONSULTATION

Head of Service:	Ian Mawer, Head of Planning Policy and Economic Development
Report Author	Ian Mawer
Wards affected:	(All Wards);
Appendix	Appendix 1: Epsom and Ewell Local Plan 2022-2040 Schedule of Proposed Main Modifications Appendix 2: Schedule of Modifications to the Policies Map Appendix 3: Epsom and Ewell Local Plan 2022-2040 Sustainability Appraisal Report Addendum Appendix 4: Epsom and Ewell Local Plan 2022-2040 Habitats Regulation Assessment of the Main Modifications Appendix 5: Epsom and Ewell Local Plan 2022-2040 Schedule of Additional Modifications

Summary

The Examination of the Epsom and Ewell Local Plan 2022-2040 commenced following the appointment of a Planning Inspector on 1 April 2025. The Planning Inspector is assessing the legal compliance of the plan and its compliance with the four tests of soundness set out in the National Planning Policy Framework (NPPF).

The purpose of this report is to present the Planning Inspectors proposed Main Modifications to the Submission Epsom and Ewell Local Plan (2022-2040) (Appendix 1) to the Committee so that they can make a recommendation to Full Council that a statutory public consultation be undertaken for a period of 6 weeks.

Recommendation (s)

The Committee is asked to:

- 1) Note the Inspectors Proposed Main Modifications to the Submission Local Plan (2022-2040) contained in Appendix 1, and revisions to the Submission Local Plan policies maps contained in Appendix 2.**
- 2) Recommend to Full Council that the statutory public consultation on the documents contained within Appendix 1 and 2, together with the Sustainability Appraisal Addendum (Appendix 3) and Habitats Regulations Assessment Addendum (Appendix 4), commence for a period of at least 6 weeks.**
- 3) Nominate and Authorise the Head of Planning Policy and Economic Development in consultation with the Chair of the Licencing and Planning Policy Committee, to make any necessary amendments to the documents listed in recommendation 2 above following the consultation should the Inspector require any further modifications.**
- 4) Nominate and Authorise the Head of Planning Policy and Economic Development in consultation with the Chair of the Licencing and Planning Policy Committee, to update the Local Development Scheme (local plan timetable).**

1 Reason for Recommendation

- 1.1 To enable the Local Plan Examination stage which is led by the appointed Local Plan Planning Inspector to continue. Consultation on the Inspectors main modifications is a legal requirement and necessary for the Examination to progress to the next stage. The Examination stage concludes once the Inspector issues her final report to the Council.

2 Background

- 2.1 The Council submitted its Local Plan for Independent Examination on 10 March 2025. At the outset of the examination process, the council formally requested that the Inspector should recommend any Main Modifications (MMs) that they consider necessary to make the plan sound and legally compliant (to allow it to be adopted).
- 2.2 An Inspector was appointed to undertake the Independent Examination of the Local Plan on 1 April 2025 and following this the Council received and responded to the Inspectors Matters, Issues and Questions (MIQs) and public Examination Hearings were held in:

- Stage 1 - August 2025 in relation to legal compliance and the duty to cooperate.
 - Stage 2 - September and October 2025 in relation to soundness.
- 2.3 During the Stage 2 hearings the Inspector requested that the Council produce some additional evidence which was necessary for the Examination to proceed. This evidence was subsequently produced and approved by the Inspector for publication on the Examination webpage.
- 2.4 At the request of the Inspector, the additional evidence documents were then subject to a non-statutory public consultation between 11 May and 15 June 2026. An additional examination hearing was then held on the 2 July 2026 that focused on the additional evidence produced by the Council.

Proposed Main Modifications (MMs)

- 2.5 Following the close of the hearings, the agreement of the MMs schedule between the Inspector and Officers, assisted by the Programme Officer (PO), was prioritised in accordance with the Procedure Guide for Local Plan Examinations so that public consultation can take place in a timely manner. The first part of this process required officers to produce a schedule of proposed MMs for the Inspector's comment which reflected the outcome of discussions at the hearings. As part of this process officers have had to work proactively with the Inspector (through the Programme Officer) to finalise the proposed MMs (Appendix 1).
- 2.6 The proposed MMs that have been identified throughout the examination process and agreed with the Inspector are necessary to secure the soundness of the new Local Plan. They are a direct outcome of the examination process. Unlike previous stages of the plan-making process prior to submission and examination, there is no opportunity for the Council to unilaterally amend the modifications – as they are specific changes agreed with the Inspector as necessary to ensure the Plan's soundness.
- 2.7 The core MMs proposed to the submitted Local Plan are set out in Section 3 of this report. As there are many MMs, they are not all summarised.
- 2.8 To reflect the proposed MMs, proposed amendments to the Policies Map have been prepared (Appendix 2). The purpose of the policies map is to illustrate geographically the application of policies in the plan. To ensure fairness, any proposed changes to the Policies Map need to be subject to consultation alongside the MMs.

Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA) of MMs

- 2.9 The Council is required to undertake HRA and SA as appropriate on the proposed MMs prior to consultation. This has been undertaken and the documents (which form addendums to the submission HRA and SA) have been drafted and approved for consultation alongside the proposed main modifications.
- 2.10 The SA Addendum (Appendix 3) introduces the proposed MMs (section 2), presents an appraisal (section 4) and considers the possibility of defining/ appraising reasonable alternatives (section 3). It reaches the conclusion that there are no reasonable alternatives at the current time.
- 2.11 The HRA Addendum (Appendix 4) focuses on whether the Main Modifications (MMs) will result in likely significant effects on any European sites. The overall conclusion is that the proposed Main Modifications will not adversely affect the integrity of any European site, either alone or in combination with other plans and projects.

Consultation

- 2.12 Consultation on the proposed MMs are required by legislation. This is a statutory six-week public consultation that is necessary for the Examination stage to progress. The consultation is only on the soundness of the MMs (Appendix 1), Policies maps changes (Appendix 2) and the accompanying SA Addendum (Appendix 3) and HRA addendum (Appendix 4).
- 2.13 Following a recommendation from this committee. Full Council will be asked to agree that the statutory consultation commences for a period of six weeks.
- 2.14 It is important to note that Council cannot suggest changes to the Inspectors proposed MMs (Appendix 1), Revisions to the Policies Map (Appendix 2), Sustainability Appraisal Addendum (Appendix 3) and Habitats Regulations Assessment Addendum (Appendix 4). This is because the Inspector is seeking views on the changes (MMs) that she feels are necessary to make the plan sound.

Additional Modifications

- 2.15 In addition to the MMs, the Council has prepared a list of minor changes to the Submission Epsom and Ewell Local Plan (Appendix 5). Such changes are known as Additional Modifications (AMs) and do not materially affect the Submission version of the Local Plan's policies and proposals. They relate to matters such as typographical errors, minor editing, factual updates and name changes. These are not matters for the Inspectors' consideration and do not form part of the statutory consultation; however, they will be published alongside the consultation documents for information.

3 Core proposed Main Modifications

3.1 The proposed MMs are attached as Appendix 1. Most of these changes are for clarity and do not change the intent of the submitted Local Plan policy wording.

3.2 The core changes arising from the proposed MMs are detailed below:

Housing Supply & Additional Housing Allocations

3.3 The proposed MMs include the addition of allocations for 12 sites located within the defined urban area and 4 sites that are currently located within the Metropolitan Green Belt. These sites are detailed below:

Proposed Allocation Number and site name	Allocated for	Main modification number
SA36 – 25 Alexandra Road, Epsom	A minimum of 10 dwellings	MM44
SA37 – Gainsborough Road estate, Epsom	A minimum of 8 dwellings	MM45
SA38 – Parking at 54 Gainsborough Road	A minimum of 6 dwellings	MM46
SA39 – 85b Hook Road, Epsom	A minimum of 8 dwellings	MM47
SA40 – Land west of Ewell By-Pass	A minimum of 38 dwellings	MM48
SA41 – Conservative Club, Epsom Club and Church	Mixed use development for community uses (approximately 1,800sqm) and a minimum of 28 dwellings	MM49
SA42 – TK Maxx	Mixed use development to provide retail and leisure uses (approx. 3,750 sqm) and a minimum of 17 dwellings	MM50
SA43 – Land R/O The Albion Public House (Mccaffertys Bar)	Mixed use development, a minimum of 11 dwellings and approximately 500sqm commercial, business or service floorspace	MM51
SA44 – Spread Eagle Shopping Centre	Mixed use development to provide retail and leisure uses (approximately 2,000sqm) and student accommodation (a minimum of 40 units)	MM52

SA45 – Auction House, Depot Road	Mixed use development to provide commercial, business and service floorspace (approximately 500sqm) and a minimum of 10 dwellings	MM53
SA46 – Laine Theatre Arts	A minimum of 6 dwellings	MM54
SA47 – Eclipse Business Park, West Hill	Mixed use development to provide commercial, business and service floorspace (approximately 1,500sqm) and a minimum of 23 dwellings	MM55
SA48 – Cuddington Glade	Residential Care Home providing at least 70 bedrooms	MM56
SA49 – Land off Cuddington Glade	Minimum of 45 dwellings	MM57
SA50 – Land at Priest Hill	Residential-led mixed use development for a minimum of 275 dwellings, commercial and/or community uses (approximately 1,000 sqm) along with a landscaped station square	MM58
SA51 – Downs Farm	<p><u>Land to the North of College Road:</u></p> <p>A minimum of 530 dwellings, employment hub, specialist school provision (up to 2.5ha) and public open space</p> <p><u>Land to the South of College Road:</u></p> <p>Public open space with improved pedestrian and cycle connectivity to Epsom Downs Station and playing pitches and supporting facilities.</p>	MM59

- 3.4 The implications of the inclusion of the sites detailed above are that the housing supply increases over the plan period (2022-2040) which is reflected in proposed changes to Policy S1: Spatial Strategy (MM3) and the Trajectory (MM180).
- 3.5 The table overleaf shows the resulting changes to the housing supply detailed in Policy S1:

Source of Supply	Submission Local Plan	Proposed Main Modifications
Completions	456	605
Commitments	600	604
Windfall (1-4)	455	385
Windfall (5-19)	407	333
Large urban sites (20+ units)	1,313	1,477
Small urban sites (5 to 19 units)	103	151
Allocations beyond current urban area to be inset from the Green Belt	1,580	2,497
Total supply over the plan period	4,914	6,052

- 3.6 The implication of the above is that the housing requirement detailed in the Local Plan will increase from a minimum of 4,700 dwellings over the plan period to a minimum of 6,012 homes. A key change is that the modifications propose a stepped housing requirement whereby the requirement for the first four years of the plan period (2022/23 – 2025/26) aligns with the housing completions delivered during this period, which average 152 homes per annum. For the remainder of the plan period, the requirement is 386 homes per annum.

Policy S6 - Affordable Housing

- 3.7 During the Examination Hearing Session on Matter 6 – Other Housing Policies (2 October 2025), there were discussions about increasing the affordable housing requirement for sites within the Green Belt or to be released from the Green Belt. This is reflected in proposed MM62.

Policy DM8 - Racehorse Training Zone

- 3.8 During the Examination Hearing Session on Matter 10 – Employment & Horse Racing (8 October 2025), the Inspector asked the Council to meet with the Jockey Club to agree a statement of common ground setting out revisions to the policy to make clear the different needs and functions of the Racecourse Area, Racecourse Training Zone and Racehorse Movement Corridor. This is reflected in proposed MM72.

Policy S11 - Design

- 3.9 During the Examination Hearing Session on Matter 7 – The Built Environment (3 October 2025), the Inspector raised concerns that the Design policy as drafted wasn't fully compliant with national planning policy and suggested that officers revisit this policy and the supporting text to make it more locally distinctive and integrate parts of Policy S13 – Preserving identity of place with heritage. This is reflected in proposed MM 74.

Policy DM15 - Green Belt

- 3.10 During the Examination Hearing Session on Matter 4 – The Green Belt (1 October 2025), the Inspector raised concerns that the Green Belt policy as submitted wasn't fully compliant with national planning policy and suggested that officers revisit this policy and the supporting text to make it more locally distinctive. This is reflected in proposed MM 82.

4 Next Steps for the Local Plan

- 4.1 The next steps for the Local Plan will depend on the decision made by committee members. The two options are detailed below:

Option 1 – LPPC recommend to Council that consultation commences on the Inspectors proposed main modifications

- 4.2 Following a recommendation from this committee. Full Council will be asked to agree that the statutory consultation commences for a period of six weeks.
- 4.3 If approved by Full Council, a six-week consultation period will provide stakeholders with the opportunity to prepare and submit representations to the Council about the:
- Schedule of proposed MMs (Appendix 1)
 - Schedule of modifications to the Policies Map (Appendix 2).
 - Sustainability Appraisal Report Addendum (Appendix 3)
 - Habitats Regulation Assessment Addendum (Appendix 4)
- 4.4 It is important to note that during the consultation:
- representations can only be made on the proposed Main Modifications to the Local Plan, not the Plan as submitted for Examination in March 2025. The consultation is therefore not an opportunity to repeat or raise further representations about the Submission Local Plan or to seek further changes to it. This will be made clear in consultation material.

- documents will be published online, and hard copies of the consultation documents will be made available for inspection at the Town Hall and borough libraries during opening hours.
- 4.5 Following the close of the consultation all representations will be shared with the Inspector and following her approval published on the Examination webpage.
- 4.6 The Inspector will consider all the representations made before finalising her examination report and the schedule of recommended MMs. The Council must then make the recommended MMs (together with any AMs) if they wish to adopt the Plan.
- 4.7 The publication of the Inspectors report concludes the Local Plan Examination. Councillors will then be invited to make a final decision at a future Full Council whether or not to approve the Epsom and Ewell Local Plan (2022-2040) as modified by the Planning Inspector.

Option 2 – LPPC do not recommend to Council that consultation commences on the Inspectors proposed main modifications

- 4.8 A report will be prepared for Council setting out the recommendation of this Committee not to proceed with the statutory consultation and will therefore request that Council formally withdraw the Local Plan from Examination.
- 4.9 The reason for recommending withdrawal of the Plan being that the Inspector's report on the Local Plan (which concludes the Examination stage) can only be issued once the Council has consulted on the proposed MMs, policies map amendments, SA Addendum and HRA Addendum and the inspector has had the opportunity to consider any representations received on these documents.
- 4.10 The report will also present an option for Council to overturn this recommendation and approve that the statutory consultation commences.

5 Local Development Scheme update

- 5.1 The report seeks the authority to update the Local Development Scheme (Local Plan timetable) so that it more accurately reflects the anticipated timetable for adoption of the Local Plan if full Council approve the proposed MMs consultation.
- 5.2 The Local Development Scheme was last updated in December 2024 and whilst the key statutory consultation stages during the plan making phase and submission for examination have been undertaken in accordance with the published timescales, the anticipated dates of adoption will require updating as they are currently stated as Spring 2026. This delay is due to the Inspector requiring additional work to be undertaken during the Examination stage (see paras 2.3 and 2.4 above).

- 5.3 It is therefore recommended that this minor update to the Local Development Scheme be undertaken under delegated authority as opposed to requiring committee approval.

6 Risk Assessment

Legal or other duties

6.1 Equality Impact Assessment

- 6.1.1 An Equality Impact Assessment will be prepared to appraise the Proposed Main Modifications to ensure that the proposed amendments to the submission Local Plan promotes equality and does not discriminate.

6.2 Crime and Disorder

- 6.2.1 None arising from this report.

6.3 Safeguarding

- 6.3.1 None arising from this report.

6.4 Dependencies

- 6.4.1 The delivery of key corporate objectives/actions are dependent on progressing the Local Plan, including:
- Actions identified in the Affordable Housing Audit
 - Homelessness and Rough Sleeper Strategy and supporting action plan
 - Climate Change Action Plan

7 Financial Implications

- 7.1 The Council has committed extensive resource to progress the Local Plan to Examination Stage and in progressing the Examination. The Inspector has confirmed that main modifications are necessary to make the Local Plan sound and has set out her proposed main modifications which must be subject to statutory public consultation for the Examination to proceed.
- 7.2 The costs of the proposed main modifications have been budgeted for including the consultation software used, staffing within the Planning Policy team, funding for specialist external support in the preparation of evidence required by legislation to support the consultation (Sustainability Appraisal and Habitats Regulations Assessment) and the costs of the Examination.

- 7.3 Any delays in progressing the proposed main modifications consultation, which is necessary for the examination stage to complete, increases the risk of speculative planning applications, which if refused by the council, may be subject to planning appeals. Defending planning appeals, especially those held as public inquiries, are expensive and will require additional resource.
- 7.4 **Section 151 Officer's comments:** The Council has committed financial and staffing resources to the preparation, submission and examination of the Local Plan 2022-2040. The costs associated have been incorporated within approved budgets.
- 7.5 Progressing the consultation on the Inspector's proposed Main Modifications is an important step towards concluding the examination and securing an up-to-date development plan for the Borough.
- 7.6 Whilst no additional budget approval is required as a result of the recommendations within this report, any material variations to the approved Local Plan budget or significant additional costs arising from the examination process will be reported through the Council's usual budget monitoring arrangements. In the meantime, the Council has the resources to ensure progressing the Local Plan (2022-2040) towards adoption.

8 Legal Implications

- 8.1 The Submission Local Plan is being examined for soundness after submission to the Secretary of State by the Inspector appointed to lead the Examination of the Local Plan.
- 8.2 The Levelling-up and Regeneration Act 2023 has made significant changes to the preparation of local plans. As the Epsom and Ewell Local Plan (2022-2040) ('the Local Plan') was submitted to the Secretary of State for examination before 31 December 2026, transitional provisions contained in the Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026 apply. The effect of these provisions is that Part 2 of the Planning and Compulsory Purchase Act ('PCPA') 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 ('the 2012 Regulations') as they had effect prior to 25 March 2026 apply to the Local Plan.
- 8.3 At the start of the Local Plan Examination hearings, we invited the examining Inspector to recommend any modifications she considered to be necessary in accordance with section 20(7C) of the Planning and Compulsory Purchase Act 2004 in line with the delegation granted by Licensing and Planning Policy Committee on the 20 November 2024.

- 8.4 The Council in its role as Local Planning Authority (LPA) must consult on all proposed main modifications. Due to the scope of the modifications, addendums to the Sustainability Appraisal and Habitats Regulations Assessment are required.
- 8.5 The Inspector's report on the Local Plan will only be issued once the LPA has consulted on the proposed MMs, policies map amendments, Sustainability Appraisal Addendum and Habitats Regulations Assessment Addendum and the inspector has had the opportunity to consider any representations received on these documents.
- 8.6 The duration of the consultation is consistent with the Government's Procedure Guide for Local Plan Examinations which states that "the nature and duration of the consultation [on proposed main modifications] should reflect that of the consultation held at Regulation 19 stage, where appropriate. This means it should last at least six weeks" (Paragraph 6.9).
- 8.7 The LPA must publish the recommendations and the report of the planning inspector following an examination (section 20(8), PCPA 2004 and regulation 25(2)(a), LPR 2012).
- 8.8 This must be done as soon as reasonably practicable after receipt of the planning inspector's recommendation and report (regulation 25(1)(a), LPR 2012) or if the Secretary of State has given a direction under section 21(1) or 21(4) of the PCPA 2004 (regulation 25(1)(b), LPR 2012).
- 8.9 The LPA must also notify those persons who requested to be notified of the publication of the inspector's recommendations that the recommendations are available (regulation 25(2)(b), LPR 2012).
- 8.10 The examination process is then complete. Once this point in the process is achieved, Members will be informed and further advice provided as to the adoption of the Modified Local Plan will follow at that stage.
- 8.11 Members should note that a Plan may be challenged by judicial review before it is adopted or under section 113 of the Planning and Compulsory Purchase Act 2004 if it has been adopted, but only on a point of law.
- 8.12 **Legal Officer's comments:** all relevant legal comments are included within the body of this report.

9 Policies, Plans & Partnerships

- 9.1 **Council's Key Priorities:** The Local Plan is a corporate priority
- 9.2 **Service Plans:** The matter is included within the current Service Delivery Plan

- 9.3 **Climate & Environmental Impact of recommendations:** The Local Plan incorporating the proposed main modifications 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.
- 9.4 **Sustainability Policy & Community Safety Implications:** The Local Plan itself has a key role in delivering sustainable development.
- 9.5 **Partnerships:** The Council has consulted relevant stakeholders throughout the Local Plan Process.
- 9.6 **Local Government Reorganisation Implications:** This will be the last Local Plan prepared by Epsom and Ewell Borough Council. As it stands, out of the five local planning authorities that will become part of the East Surrey Unitary Authority we have the oldest Local Plan document with our Core Strategy dating from 2007.
- 9.7 The new Unitary Authority will be responsible for preparing a new local Plan for its geographical area from the 1 April 2027; however it is uncertain as to how long this process will take given the introduction of a new tier of planning, known as Spatial Development Strategic that future Local Plans will need to be in conformity with.
- 9.8 Therefore, it is considered that progressing the Local Plan examination to its conclusion following receipt of the Inspectors report will enable the Council to decide whether they wish to have an up to date and adopted Local Plan in advance of East Surrey Unitary authority preparing a Local Plan.

10 Background papers

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

Previous reports:

- [Licensing and Planning Policy Committee, Local Plan Update, 10 March 2026.](#)
- [Licensing and Planning Policy Committee, Proposed Submission Epsom and Ewell Local Plan \(Regulation 19\), 20 November 2024.](#)

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Epsom & Ewell Local Plan 2022-2040

Examination in Public Schedule of Proposed Modifications

Page 67

Main Modifications

The modifications below are expressed either in the conventional form of ~~strike through~~ for deletions and underlining for additions of text.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Agenda Item 7
Appendix 1

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM1	10-12	Introduction	<p>1.18. 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’ <u>(identifiable by the policy starting with the prefix S)</u>, and ‘site allocations’ <u>(identifiable by the policy starting with the prefix SA)</u>, which set the strategy for the Local Plan and provide the high-level principles that development must adhere to. 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. Specific land designations are detailed on the Policies Map which accompanies the Local Plan.</p> <p>1.19. There are also detailed (non-strategic) policies called ‘Development Management’ policies, <u>(identifiable by the policy starting with the prefix DM)</u>, which provide the detailed criteria and standards which proposed development will be assessed against. Non-strategic policies in this Local Plan may be superseded by any policies identified in future Neighbourhood Plans.</p> <p>1.31. The number of people employed in the borough is forecast to increase by over 6,069 jobs over the Local Plan period which will generate a need for at least <u>41,464 sqm of additional employment floorspace</u> (HEDNA, 2023).</p>	<p>To be clear which policies within the Local Plan are strategic, non-strategic and site allocations, to ensure the plan is effective and positively prepared</p> <p>Necessary to identify the employment needs in the borough over the plan period to ensure the plan is effective and positively prepared</p>
MM2	15-16	Vision	<p>2.1. 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 sets should set out a</p>	Necessary to amend wording to ensure clarity effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>vision. The vision is should be ambitious but achievable. In addition, to support this vision, strategic objectives will prioritise outcomes and provide a reference point that both ground and justify policies in the Local Plan.</p> <p>Vision</p> <p>The vision for the borough up to 2040 is: Epsom and Ewell will continue to By 2040, the borough will 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.</p> <p><u>Its identity will have been strengthened, with new developments and supporting public realm enhancements demonstrating high quality sustainable design that contributes positively to the local character and heritage of the built and natural environment.</u></p> <p><u>Epsom Town Centre, as the principal urban centre with excellent public transport, will remain a thriving centre, providing new homes, employment opportunities, retail, leisure, culture and community facilities including modern facilities for the University for the Creative Arts and the Laine Theatre Arts School.</u></p>	Vision has been reordered and reworded to be more concise, necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p><u>Ewell Village and Stoneleigh Broadway centres will provide hubs for the communities they serve through convenience shopping and other commercial services and public services.</u></p> <p><u>The Epsom Downs racecourse will continue to be a significant part of the borough's unique identity alongside a successful racehorse training industry. The wider 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.</u></p> <p><u>New homes will have been delivered, including the creation of vibrant new communities with their own identities, providing homes for people of all ages with supporting infrastructure including improved public transport and pedestrian and cycling routes, social infrastructure and access to blue and green infrastructure.</u></p> <p>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.-</p>	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>New development will have been focused on urban sites, with the role of Epsom Town Centre of paramount importance having seen the most exciting and significant opportunities for growth.</p> <p>New vibrant communities with their own identities will be centred around previously underdeveloped transport hubs and principal movement corridors.</p> <p>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.</p> <p>The Epsom Downs racecourse will continue to be a significant part of the borough's unique identity and support a thriving equestrian sector.</p> <p>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, whilst supporting the existing shops, leisure cultural uses, public</p>	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>transport services and community facilities that are so valued by existing residents. –</p> <p>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.</p> <p>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. –</p> <p>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;</p>	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>increasing the number of residents served by these centres, helping to make them more viable in the longer term:—</p> <p>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:—</p> <p>Epsom and Ewell will continue to be valued by those who live in, work in and visit it. Its network of green spaces that are embedded within communities will have been strengthened by development. With new public open spaces as well as enhancements to the borough's existing streets and green spaces, improvements in habitats for wildlife, and provision of better links between existing green and blue infrastructure, amenity for both new and existing residents will be secured:—</p> <p>Growth will be different from what it has been before. There will be a greater emphasis on design and built quality, the delivery of environmentally sustainable homes, 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</p>	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>past mistakes by replacing poorly designed buildings and spaces with higher quality sustainable development.-</p> <p>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:-</p>	
MM3	18-23	Policy S1	<p>3.5. The urban areas of the borough have been thoroughly assessed through the Land Availability Assessment (LAA) 2024, to identify the amount of development that could be sustainably and achievably accommodated. It was found that the urban sites can only provide approximately <u>1,6283,336</u> dwellings <u>which when combined with completions, commitments and windfalls accounts for</u> (approximately 353% of the identified need for housing within the borough based on the 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.</p> <p>3.9. Through the allocation of five <u>nine</u> sites to be inset <u>removed</u> from the Green Belt, the council will be able to deliver an additional <u>1,5802,497</u> dwellings over the plan period, which combined with the urban area supply equates to approximately 4859% of the need established by the standard methodology. This is the</p>	Necessary to ensure plan reflects the correct numbers to ensure plan is justified and effective and consistency with national policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>council's preferred spatial strategy which balances social, economic and environmental objectives.</p> <p>3.13. The council has carried out a robust and objective assessment of its employment needs which is detailed in the HEDNA. 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. The HEDNA shows that there is demand for <u>at least 41,464 sqm</u> of additional employment floorspace in the area to meet the needs of existing businesses and to cater for new businesses.</p> <p><i>New paragraphs in-between para. 3.13 and 3.14:</i></p> <p><u>The HEDNA employment modelling based on the baseline jobs growth scenarios forecasts over the Local Plan period a need for approximately:</u></p> <ul style="list-style-type: none"> • <u>13,000 sqm of office and R&D (E(g)(i)(ii)) floorspace</u> • <u>13,000 sqm of light and general industrial floorspace (E(g)(iii) and B2),</u> • <u>15,500 sqm of warehousing floorspace (B8)</u> <p><u>In relation to supply, making use of vacant office floorspace in borough, specifically, Epsom Town</u></p>	<p>Necessary to clarify employment needs to ensure the plan is effective and positively prepared.</p> <p>New paragraphs to clarify employment needs necessary to ensure the plan is effective and consistent with national policy</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p><u>Centre is likely to satisfy forecast employment needs for office accommodation over the plan period.</u></p> <p><u>In terms of needs for light industrial, industrial and warehousing floorspace this will be met through the completion of planning permissions that have commenced (approx. 5,000sqm), some additional employment land at Site Allocation SA35, an expansion of Longmead Industrial Estate and the intensification of the Longmead and Kiln Lane Industrial Estates to meet the residual need for 23,000sqm of industrial and warehousing space over the plan period.</u></p> <p>3.17. The council has carried out a Retail and Commercial Leisure Needs Assessment (2020 and update 2021), which identifies no substantial additional comparison or convenience needs and recommends a strategy of consolidation rather than growth for Epsom Town Centre and Stoneleigh and Ewell Village local centres. <u>These conclusions were revisited in 2025 and concluded to be robust.</u></p> <p>3.20. 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 and further detail on</p>	<p>Modification to clarify the most recent review of the retail needs evidence is up to date and robust. Necessary for clarity and effectiveness</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>their role in the spatial strategy is shown in Figure 3.1 the hierarchy of development detailed below:</p> <p>3.22. The hierarchy of development is detailed overleaf:</p> <p>3.31. Whilst these sustainable locations are our preferred locations for new development, they do not deliver adequate housing to meet our social responsibilities to provide additional housing. For this reason, the Local Plan contains five site allocations that will make a substantial contribution towards meeting housing and Gypsy and Traveller accommodation needs over the Plan period on land that is inset removed from the Green Belt.</p> <p>3.32. The spatial strategy incorporates appropriate previously developed land within the existing built-up area to be removed from the Green Belt currently designated as Green Belt (site allocations SA31 and SA32) and greenfield land in the most sustainable locations adjacent to the existing built-up areas that are proposed to be removed from the Green Belt (site allocations SA33 to SA35 and SA48 to SA51).</p> <p>3.33. When considering all sources of supply, the Local Plan housing requirement has been set as a minimum of 4,700 <u>6,012</u> dwellings over the plan period (2022-2040).</p>	<p>Amendment necessary to address drafting error, hierarchy is listed - no figure 3.1. Removal of duplicated wording. Necessary for effectiveness. Deleted text, necessary for effectiveness, to avoid unnecessary duplication</p> <p>Modified to more appropriate wording, necessary for effectiveness and consistency with national policy</p> <p>Modified to appropriate wording addressed in later policy. Necessary for effectiveness and</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification														
			<p>How the council will achieve this minimum requirement is set out in Table S1a below. It should be noted that the supply includes a windfall allowance, which is based on past delivery trends. The total supply exceeds the requirement by 40214 dwellings, which provides a degree of flexibility over the Local Plan period should sites fail to be delivered. Further details of the sites that are key to delivering the strategy are contained in the site allocations policies of the Local Plan and shown on the Policies Map. How and when the different sources of supply are anticipated to deliver housing is contained in the Housing Trajectory (Appendix 2).</p> <p>Table S1a: Sources of supply over the Local Plan period: 2022-2040 (net number of new homes)</p> <table><tr><th>Source of supply</th><th>Net no. of units</th></tr><tr><td>Housing Requirement</td><td>6,012 4,700</td></tr><tr><td>Housing completion to date (April 2022 to March 202426)</td><td>605 456</td></tr><tr><td>Commitments (permissions as of April 202426) with 10% lapse rate applied</td><td>604 600</td></tr><tr><td>Windfall (1-4 units)</td><td>385 455</td></tr><tr><td>Windfall (5-19 units)</td><td>333 407</td></tr><tr><td>Large urban sites (20+ units)</td><td>1,477 1,313</td></tr></table>	Source of supply	Net no. of units	Housing Requirement	6,012 4,700	Housing completion to date (April 2022 to March 2024 26)	605 456	Commitments (permissions as of April 2024 26) with 10% lapse rate applied	604 600	Windfall (1-4 units)	385 455	Windfall (5-19 units)	333 407	Large urban sites (20+ units)	1,477 1,313	<p>to remove unnecessary duplication.</p> <p>Modified to reflect increased housing supply and trajectory, necessary for plan to be positively prepared and consistent with national policy</p> <p>It is necessary for the policy to modify housing requirements in order to be positively prepared and consistent with national policy</p>
Source of supply	Net no. of units																	
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Large urban sites (20+ units)	1,477 1,313																	

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			<table><tr><td>Small urban sites (5 to 19 units)</td><td>151 103</td></tr><tr><td>Allocations beyond current urban area to be inset removed from the Green Belt</td><td>2,497 1,580</td></tr><tr><td>Total supply over the plan period</td><td>4,914 6,052</td></tr></table> <p>Policy S1 – Spatial Strategy</p> <p>1) During the plan period (2022-2040):</p> <p>a) provision has been made for at least 4,700 <u>6,012</u> new homes <u>The minimum requirement is split into an annual average requirement on a stepped basis as follows:</u></p> <ul style="list-style-type: none"><u>Years 1 – 4 (2022/23 – 2025/26) – 152 homes per annum</u><u>Years 5 – 18 (2026/27 – 2039/40) – 386 homes per annum</u> <p>Table S1a shows the contribution of all sources of housing supply to deliver this housing requirement.</p> <p>b) Employment needs <u>At least 41,464 sqm of employment floorspace</u> (office, light industrial, industrial and warehousing) will be met delivered through the development and intensification of the strategic employment sites (as defined on the policies map), and the delivery of additional employment</p>	Small urban sites (5 to 19 units)	151 103	Allocations beyond current urban area to be inset removed from the Green Belt	2,497 1,580	Total supply over the plan period	4,914 6,052	<p>Modified to reflect increased housing supply and trajectory</p> <p>Modified policy to specify employment and retail needs. Additional text to create Part 2 of the policy. Text relocated and reworded from Policy S2 and the supporting text</p> <p>It is necessary for the policy to set housing and employment land requirements in order to ensure the policy is effective, positively prepared and consistent with national policy and to ensure the policy is effective</p>
Small urban sites (5 to 19 units)	151 103									
Allocations beyond current urban area to be inset removed from the Green Belt	2,497 1,580									
Total supply over the plan period	4,914 6,052									

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>floorspace that is compatible with residential use in Epsom Town Centre.</p> <p>c) Retail needs Any need arising for additional retail will be met through the consolidation and enhancement of existing facilities within existing Epsom Town Centre, local centres and neighbourhood parades.</p> <p>d) Provision has been made for 10 permanent pitches for Gypsies and Travellers within Epsom and Ewell over the plan period. The council will seek to make provision for additional pitches for Gypsies and Travellers by permitting suitable sites.</p> <p>2) <u>The Council will expect the development proposals and use of land to contribute positively to the social, economic and environmental enhancement of the Borough.</u></p>	
MM4	24	Key diagram	Insert copy of existing and proposed key diagram to show reference to removal of inseting of Green Belt Boundary, the correct Green Belt boundaries and new site allocations	To ensure the key diagram is positively prepared and consistent with national policy
MM5	25	Policy S2	<p>Policy S2 – Sustainable and Viable Development</p> <p>3.35. Local Plans should be based upon and reflect the presumption in favour of sustainable development</p>	Modified supporting text of Policy S2 to reflect the focus on viability as the sustainable development

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>detailed in the National Planning Policy Framework. This principle informs both the policies and site allocations contained within the Local Plan and will be used to guide decision making.</p> <p>3.35. <u>Policy requirements of this plan have been tested and concluded to be viable. This has been confirmed by the viability assessment of the Local Plan. There should be no need for a further viability assessment at the decision-making stage. Unless the applicant advises that a late stage review is necessary. Site promoters will be expected to take account of costs arising from the policy requirements set out in the plan when negotiating to purchase land for development. The price paid for land is not a justification for failing to comply with the relevant policies in the Plan.</u></p> <p>3.36. <u>Where particular circumstances justify the need for a viability assessment at the application stage, it will be up to the applicant to demonstrate how those circumstances differ from the viability assessment carried out to inform the Plan, having regard to the specific grounds set out in national planning guidance. The viability assessment will usually 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</u></p>	<p>element of the policy has been moved to Policy S1</p> <p>Necessary for effectiveness and in order to reflect changes to other policies in the Plan</p> <p>Additional text necessary for effectiveness and to reflect changes to other policies in the Plan removing unnecessary duplication</p> <p>Modified text necessary for effectiveness and to ensure policy is positively prepared</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p><u>return expected to be realised, and the profit expected to be released.</u></p> <p>3.36:3.37. To facilitate an efficient decision-making process, any financial viability report/appraisal must be in compliance with the Homes England Development Appraisal Tool (DAT) or any future equivalent standard. If this is not provided it will delay the application or lead to the refusal of planning permission.</p> <p>3.37. 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.</p> <p>3.38. By 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 late-stage viability review mechanisms through s106 agreements where policy requirements are not met in full at the time permission is granted.</p>	...

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p><u>Viability late stage reviews</u></p> <p><u>3.39. The Council recognises that financial viability will vary over time with the changing economic and property markets and that viability assessments submitted in support of developments are only current at the time that they are prepared. Therefore, the council will require late-stage viability review mechanisms through a legal agreement where policy requirements are not met in full at the time permission is granted.</u></p> <p>3.393.40. The council's position for late-stage viability reviews 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.</p> <p>3.40 3.41. On larger sites that are expected to be built out over a number of years, or in phases, the council will require viability to be re-assessed at multiple stages (such as prior to the commencement of different phases).</p> <p>3.41 3.42. For schemes where the outturn test <u>late stage review</u> demonstrates that viability has improved and</p>	Necessary for the effectiveness for the policy to specify circumstances where the Council may require late stage viability review

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>the approved scheme did not satisfy the affordable housing policy requirements set out in the Local Plan, the council will expect additional affordable housing to be provided on-site or in exceptional circumstances, an in lieu contribution to off-site affordable housing, will be required work with the developer to deliver increased affordable housing provision having regard to the outcomes of the late stage review. Additional affordable housing should be provided on site (where feasible) or through an in lieu contribution to offsite affordable housing.</p> <p>Policy S2 – Sustainable and Viable Development</p> <p>Sustainable Development</p> <p>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.</p> <p>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.</p>	<p>Necessary for effectiveness for 'sustainable development' parts of the policy moved to policy S1 and to remove unnecessary duplication</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>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:</p> <p>a) any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework or taken as a whole; or</p> <p>b) specific policies in the National Planning Policy Framework indicate that development should be restricted.</p> <p>Viable Development</p> <p>41) Viability will only be considered a constraint in exceptional circumstances and where there are significant additional costs not anticipated through the Local Plan process. The starting point is that the policy requirements detailed in this plan are viable and that development proposals should meet all policy requirements in full.</p> <p>52) In order to demonstrate viability constraints to justify not meeting the local plan policy requirements in full, proposals must be supported by viability study. 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</p>	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>return expected to be realised, and the profit expected to be released. Where applicants consider particular circumstances justify the need for a viability assessment at the application stage, they will need to demonstrate how those circumstances differ from the viability assessment carried out to inform the Local Plan, such as that there are unforeseen significant additional costs. The council will commission an independent review of submitted viability assessments which will be funded by the applicant.</p> <p>6) Where an applicant submits a viability assessment, the council will commission an independent review of the costs of which will be funded by the applicant.</p> <p>73) Where it is concluded that the development would be unviable if it were to comply with the policies in this plan, the council will require an applicant to enter into a legal agreement to review viability at a specific stage or stages in the delivery of the development.</p>	
MM6	27	Policy S3	Policy S3 – Climate Change <u>Adaption</u> and Mitigation	To ensure the name of the policy more accurately reflects what the policy covers, necessary for effectiveness
MM7	30	Policy S4	Policy S4: Epsom Town Centre <p>1) <u>Epsom Town Centre is defined on the policies map. Development will be permitted here which: The</u></p>	Modifications to include adding reference to the efficient use of land, securing mixed uses and

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>Council will work with partners and private developers to:</p> <ul style="list-style-type: none"> a. Promotes <u>Encourage</u> the regeneration of the town centre to deliver high quality <u>and high density</u> development <u>that makes efficient use of land</u> through the redevelopment of the site allocations detailed in this plan and other windfall sites that may come forward in the future; b. Encouraging <u>Secures</u> a diverse mix of uses, where possible, including housing (including specialist accommodation), retail, offices, higher education and the creative and cultural industry, food and drink establishments, health and community spaces; c. <u>Maintains</u> and <u>enhances</u> the visitor experience and night-time economy; d. <u>Retains</u> and <u>enhances</u> existing markets and support opportunities for the creation of new markets; e. <u>Delivers</u> high quality public realm integrating tree planting, landscaping and good quality design to assist in delivering the aspirations of the Epsom Town Centre Masterplan; f. <u>Supports</u> the delivery of the Surrey Local Transport Plan 4 and any successors, and 	criteria g. Necessary for the effectiveness of the policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>proposals in the Epsom and Ewell Local Cycling and Walking Infrastructure Plan to support the transition towards zero carbon transport;</p> <p>g. Ensures the distinctive character of Conservation Areas within the town centre boundary are conserved and, where possible, or enhanced.</p> <p>3.52 Epsom Town Centre is the main centre for the borough and provides for a mix of shopping, leisure, civic, cultural and community facilities. The boundary of the town centre is shown on the policies map.</p>	Necessary for effectiveness to recognise the role that residential use play within the town centre and remove the reference to policies map as this has been moved to the policy wording
MM8	32	Para 4.3	<p>4.3. Site Allocation policies SA1 – SA30, and SA36-SA47 - set out the residential-led site allocations within the borough's urban area, whilst policies SA31-SA35, SA48-SA51 allocate land for development that is to be removed inset from the Green Belt.</p>	<p>Modified to more appropriate wording on Green Belt allocations and the additional references to additional site allocations</p> <p>Necessary for effectiveness and ensuring the Plan is positively prepared</p>
MM9	33	Policy SA1	<p>Policy SA1 – Southern Gas Network Site</p> <p>Allocated for: Approximately A minimum of 455 456 dwellings (63) and a bespoke performing arts centre for the Laine Theatre Arts.</p>	Modified to reflect number of units as a minimum of 456 dwellings necessary to ensure consistent with national policy and optimising density

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>Site Area: 1.54 61.69 ha</p> <p>Planning history: Application <u>reference 24/01107/FUL</u> (<u>permitted</u>)</p>  <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ol style="list-style-type: none"> Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>that is designed to minimise potential conflict between car users, pedestrians and cyclists.</u> Provide a linear <u>public</u> open space to provide permeability through the site for pedestrians and cyclists into and from the development to provide 	<p>Removed 'C3' , Modified site area and added 'permitted' with the addition of application 'reference' wording all for effectiveness</p> <p>Part a) modified for effectiveness and to recognise potential conflict between users in this location</p> <p>Part b) amended to reflect planning permission</p> <p>Remaining parts of the policy amended for effectiveness</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>connectivity between Hook Road and the Rainbow Leisure Centre.</p> <p>c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>d) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.</p> <p>e) Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.</p> <p>f) Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the railway that adjoins the northern boundary of the site.</p> <p>g) Conserve and, where possible, or enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings that adjoin the site, <u>through design incorporating positive elements of local character and appearance.</u></p>	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<ul style="list-style-type: none"> a) Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential. b) Be designed Design to enable the comprehensive redevelopment of the adjoining Hook Road Car Park site (Site Allocation SA2) as a future phase. c) <u>Include mixed use ground floor active frontages providing Commercial, Business and Service floorspace to provide natural surveillance of the public realm.</u> 	
MM10	35	Policy SA2	<p>Policy SA2 – Hook Road Car Park Allocated for: Approximately <u>A minimum of 145 150</u> dwellings. Site Area: 0.486ha Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site <u>that is designed to minimise potential conflict between car users, pedestrians and cyclists.</u> b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site- 	<p>Modified to reflect number of units as a minimum of 145 dwellings necessary to ensure consistent with national policy and optimising density Parts a, c and f amended for effectiveness Modified part i) to incorporate wording around active frontages necessary for effectiveness</p> <p>Part j) Include wording to reflect future car park study to ensure policy is positively prepared</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>c) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1; as well as meeting the requirements for sustainable drainage in Policy S16.</p> <p>d) Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.</p> <p>e) Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the railway that adjoins site.</p> <p>f) Conserve and, where possible, or enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings.</p> <p>g) Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</p> <p>h) Be designed as a future phase of the adjoining Southern Gas Networks Site (Site Allocation SA1).</p> <p>i) <u>Include mixed use ground floor active frontages providing Commercial, Business and Service</u></p>	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p><u>floorspace to provide natural surveillance of the public realm.</u></p> <p>j) <u>Consider the findings of the Councils car parking study and its recommendations in relation to public car parking provision at the site.</u></p>	
MM11	36	Policy SA3	<p>Policy SA3 – Solis House, 20 Hook Road</p> <p>Allocated for: Approximately <u>A minimum of 20 dwellings (C3).</u></p> <p>Site Area: 0.07ha Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide safe and appropriate vehicle, pedestrian and cycle access from Hook Road. b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. c) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. d) Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not 	<p>Modified to reflect number of units as a minimum necessary to ensure consistent with national policy and optimising density</p> <p>Removed 'C3' as use classes, part a, f and g all modified for effectiveness</p> <p>Part h) Criteria added in terms of design to reflect the site's prominent location to ensure policy is positively prepared</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>subject to a significant adverse level of noise disturbance from the adjoining railway line.</p> <p>e) Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.</p> <p>f) Conserve and, where possible, or enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings <u>through sensitive design incorporating positive elements of local character and appearance.</u></p> <p>g) Undertake archaeological investigations in accordance with Policy DM13 15, taking account of the site's location within an Area of High Archaeological Potential.</p> <p>h) <u>Consider the site's prominent location for a high-quality designed landmark building.</u></p>	
MM12	37	Policy SA4	<p>Policy SA4 – Bunzl, Hook Road</p> <p>Allocated for: Approximately <u>A minimum of 35-20</u> dwellings.</p> <p>Site Area: 0.17ha</p> <p>Planning history: <u>Application reference 24/00230/FUL & 23/01440/PDCOU (both permitted)</u></p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p>	Modified to reflect number of units as a minimum of 35 necessary to ensure consistent with national policy and optimising density. Addition of 'application reference' wording and permitted for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site.</p> <p>b) Conserve and, where possible, or enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings at 10 and 12 Hook Road.</p> <p>c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</p> <p>d) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.</p> <p>e) Investigate and if identified remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.</p>	<p>Part a) modified to address site specific access for effectiveness</p> <p>Add 'conserve or enhance' to all references in site allocations</p> <p>Part d) For clarification purposes</p>
MM13	38	Policy SA5	<p>Policy SA5 – Epsom Town Hall Allocated for: Approximately <u>A minimum of</u> 90 dwellings (C3). Site Area: 0.74ha Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Dullshot Green.</p>	<p>Modified to reflect number of units as a minimum necessary to ensure consistent with national policy and optimising density</p> <p>Removed 'C3' as use classes, amended parts a, e,f, g and h to ensure policy is positively prepared</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<ul style="list-style-type: none"> b) Maximise retention and safeguarding of existing trees and incorporate them into a well-integrated landscape strategy. c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. d) Design surface and foul water drainage to include all required measures arising from the site being located in Ground Source Protection Zone 1. e) Undertake archaeological investigations in accordance with Policy DM1345 taking account of the site's location within an Area of High Archaeological Potential. f) Conserve and, where possible, or enhance the setting of the Epsom Town Centre Conservation Area and the Grade II listed 'Old Pines' that are located in close proximity to the site <u>through sensitive design incorporating positive elements of local character and appearance.</u> g) <u>Retain some public car parking which includes blue badge spaces.</u> h) <u>Maximise linkages with the town centre by integrating cross site movement routes for pedestrians and cyclists.</u> 	
MM14	39	Policy SA6	<p>Policy SA6 – Hope Lodge Car Park</p> <p>Allocated for: Approximately 30 dwellings (C3). <u>A minimum of 35 30 dwellings</u></p>	Modified to reflect number of units as a minimum of 35 necessary to ensure consistent

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>Site Area: 0.4ha</p> <p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ol style="list-style-type: none"> Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Dullshot Green. Maximise retention and safeguarding of existing trees and hedgerows, and incorporate them into a well-integrated landscape strategy <u>which frames and provides intervisibility of Dullshot Green as a public space.</u> Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. Undertake archaeological investigations in accordance with policy DM13 15, taking account of the site's location within an Area of High Archaeological Potential. Conserve and, where possible, or enhance the setting of Grade II Listed Hope Lodge that adjoins the site boundary to the East <u>through sensitive design incorporating positive elements of local character and appearance.</u> <u>Consider the findings of the Councils car parking study and its recommendations in relation to public car parking provision at the site.</u> 	<p>with national policy and optimising density</p> <p>Removed 'C3' as use classes, amended parts a,b,e and f for effectiveness</p> <p>Amend part g Include wording to reflect future car park study to ensure policy is positively prepared</p> <p>Changes necessary to ensure policy is justified and effective</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM15	40	Policy SA7	<p>Policy SA7 – Former Police and Ambulance Station Sites</p> <p>Allocated for: Erection of a new 85 bedroom residential, nursing and dementia care home for the frail elderly (Use Class C2).</p> <p>Site Area: 0.37ha</p> <p>Planning history: Application reference 22/00923/FUL (approved, subject to S106 agreement)</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ol style="list-style-type: none"> Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Church Street. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. Conserve and, where possible, or enhance the setting of Grade II building at 45 Church Street that lies beyond the site boundary <u>through sensitive design incorporating positive elements of local character and appearance.</u> Minimise loss of existing trees, including appropriate root protection for those immediately adjacent to the site. 	<p>Modified to removed use class reference, add the addition of ‘application reference’ wording and deletion of ‘subject to S106 agreement’ all necessary to ensure the policy is positively prepared</p> <p>Parts a and d modified to ensure the policy is effective</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM16	41	Policy SA8	<p>Policy SA8 – Epsom Clinic Allocated for: Approximately A minimum of 30 dwellings. Site Area: 0.17ha Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Dullshot Green. b) Conserve and, where possible, or enhance the setting of the Church Street Conservation Area that adjoins the site boundary to the South West and the Grade II Listed Hope Lodge that lies beyond the site boundary to the North <u>through sensitive design incorporating positive elements of local character and appearance.</u> c) Undertake archaeological investigations in accordance with Policy DM1345, taking account of the site's location within an Area of High Archaeological Potential. d) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. e) Design surface and foul water drainage to include all required measures arising from the site being in Groundwater Source Protection Zone 1. f) Minimise the loss of existing trees and hedgerows within the site. 	<p>Modified to reflect number of units as a minimum of 30 necessary to ensure consistent with national policy and optimising density</p> <p>Part a) site specific vehicular access and transport needs modified for effectiveness as are parts b, and c</p>
MM17	42	Policy SA9	Policy SA9 – Depot Road and Upper High Street Car Park	Modified to reflect the number of units as a minimum of 100 dwellings necessary to ensure

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>Allocated for: Approximately A minimum of 100 dwellings (C3) and a decked public car park. Site Area: 1.24ha Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Upper High Street and Church Street. b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. c) <u>Conserve or enhance</u> Have regard to the setting of the adjoining Pikes Hill Conservation Area <u>located to the east of the site through sensitive design.</u> d) Have regard to the high voltage power cables that run under part of the site to serve the adjoining electricity sub station in the design of the development. e) Undertake archaeological investigations in accordance with Policy DM1345, taking account of the site's partial location within an Area of High Archaeological Potential. f) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. 	<p>consistent with national policy and optimising density. Removed 'C3' use class reference, amend part a, c, and g to ensure the policy is positively prepared and effective</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			g) <u>Consider the findings of the Councils car parking study and its recommendations in relation to public car parking provision at the site.</u>	
MM18	43	Policy SA10	<p>Policy SA10 – 79-85 East Street</p> <p>Allocated for: Approximately <u>A minimum of 34 dwellings (C3).</u></p> <p>Site Area: 0.22ha</p> <p>Planning history: <u>Application reference 22/01953/FUL and 22/01954/FUL (both permitted)</u></p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>a) <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from East Street and/or Linton's Lane.</u></p> <p>ab) Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining A24.</p> <p>bc) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>ed) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</p>	<p>Modified so the number of units reflected as a minimum of 34 units necessary to ensure consistent with national policy and optimising density</p> <p>Removed 'C3' as use class and changed to criteria a and d to ensure the policy is positively prepared and effective</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			de) Conserve and, where possible, or enhance the setting of the adjoining Lintons Lane Conservation Area and Grade II Listed buildings at 10 and 12 Lintons Lane through sensitive design incorporating positive elements of local character and appearance.	
MM19	44	Policy SA11	<p>Policy SA11 – Finachem House, 2 – 4 Ashley Road</p> <p>Allocated for: Approximately A minimum of 38 20 dwellings (C3) or 90 units of student accommodation</p> <p>Site Area: 0.12ha</p> <p>Planning history: Pre-application</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from the Ashley Road. b) Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining A24. c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. 	Modified so the number of units reflected as a minimum and amended number of units to ensure policy is positively prepared. Removed 'C3' as use class, amended part a, g, e and f addressing site specific requirements for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>d) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</p> <p>e) Conserve and, where possible, or enhance the setting of the Epsom Town Centre Conservation Area and the Grade II* listed 'Ashley House' that adjoin the site boundary to the North <u>through sensitive design incorporating positive elements of local character and appearance.</u></p> <p>f) Undertake archaeological investigations in accordance with Policy DM1345, taking account of the site's location within an Area of High Archaeological Potential.</p> <p>g) <u>Consider the site's prominent location for a high-quality design landmark building.</u></p>	

MM20	45	Policy SA12	<p>Policy SA12 – Global House</p> <p>Allocated for: Approximately A minimum of 75 dwellings (C3)</p> <p>Site Area: 0.29ha</p> <p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ol style="list-style-type: none"> Provide appropriate pedestrian and cycle access to the site <u>from Ashley Avenue</u>. Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining A24. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. Conserve and, where possible, or enhance the setting of the nearby Epsom Town Centre Conservation Area and listed buildings <u>through sensitive design incorporating positive elements of local character and appearance</u>. Undertake archaeological investigations in accordance with Policy DM153, taking account of the site's location within an Area of High Archaeological Potential. 	<p>Modified to reflect the number of units as a minimum of 75 necessary to ensure consistent with national policy and optimising density.</p> <p>Removed 'C3' as use class, amend part a addressing site specific vehicular access and transport needs and part e for clarification purposes and to reference design, part f to reference correct policy</p> <p>All changes necessary changes for effectiveness</p>
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Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM21	46	Policy SA13	<p>Policy SA13 – Swail House</p> <p>Allocated for: Refurbishment of Swail House for residential use (approximately 45 dwellings) and the provision of replacement purpose-built specialist accommodation for the RNIB consisting of approximately a minimum of 45 dwellings (net) located to the rear of Swail House.</p> <p>Site Area: 1.05ha</p> <p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ol style="list-style-type: none"> Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Heathcote Road and <u>pedestrian and cycle access from Heathcote Road and Ashley Road.</u> Ensure the site layout maximises retention and safeguarding of mature existing trees, including those covered by a Tree Preservation Orders, incorporating them in a coherent landscaping strategy for the site. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. Conserve and, where possible, or enhance the setting of the Church Street conservation area that adjoins 	Modified to reflect latest position with planning application and to state a minimum number of units. Part a amended to address site specific vehicular access and transport needs modified for precision, part e of the policy amended to add specific design criteria and part g amendment to reference correct policy. All necessary changes made for effectiveness of the policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>the site <u>through sensitive design incorporating positive elements of local character and appearance.</u></p> <p>f) Retention of the Grade II listed wall that forms part of the site boundary.</p> <p>g) Undertake archaeological investigations in accordance with Policy DM1315, taking account of the site's location within an Area of High Archaeological Potential.</p>	
MM22	47	Policy SA14	<p>Policy SA14 – 60 East Street</p> <p>Allocated for: Approximately <u>A minimum of 30 dwellings (C3)</u></p> <p>Site Area: 0.24ha</p> <p>Planning history: <u>Application reference 24/00900/PDCOU (permitted prior approval)</u></p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>from East Street</u>. b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. c) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. 	Modified to reflect a minimum number of units, Use class reference removed, addition of 'application reference' wording and permission, part a amended to address site specific vehicular access and transport needs. All changes necessary for effectiveness of the policy
MM23	48	Policy SA15	<p>Policy SA15 – Corner of Kiln Lane and East Street (101b East Street)</p> <p>Allocated for: Approximately <u>A minimum of 5 dwellings</u></p>	Modified to reflect the number of units as a minimum of 5 units necessary to ensure consistent with national policy and

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>Site Area: 0.03ha Planning history: <u>Application reference 15/01663/FUL</u> (unimplemented)</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Kiln Lane. b) Design surface and foul water drainage to include all required measures arising from the site being located in Source Protection Zone 1. c) <u>Consider the site's prominent location for a high-quality designed landmark building.</u> 	<p>optimising density. Addition of 'application reference' wording, additional text to part a to address site specific vehicular access and transport needs and further text to reflect the prominence of the site/landmark building.</p> <p>Necessary for the effectiveness of the policy</p>
MM24	49	Policy SA16	<p>Policy SA16 – Land at Kiln Lane</p> <p>Allocated for: Approximately <u>A minimum of</u> 40 dwellings Site Area: 0.67ha Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>from Kiln Lane.</u> b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. c) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. 	<p>Amended to reflect the number of units as a minimum, necessary to ensure consistent with national policy and optimising density. Parts a and e additional text to ensure regard is had to residential amenity given the proximity of industrial uses.</p> <p>Necessary changes made for effectiveness</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			d) <u>Design the scheme to ensure the amenity impacts on future occupiers from adjacent non-residential uses is adequately addressed.</u>	
MM25	50	Policy SA17	<p>Policy SA17 – Hatch Furlong Nursery</p> <p>Allocated for: Approximately <u>A minimum of 30 dwellings (C3)</u></p> <p>Site Area: 0.5ha</p> <p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide appropriate vehicle, pedestrian and cycle access to the site from Castle Way or the A24 Ewell Bypass which meets all relevant requirements of the Highways Authority with regard to accessibility and safety. <u>Provide pedestrian and cycle access to the site from Cheam Road.</u> b) Maximise retention and safeguarding of existing trees and hedgerows, and incorporate them into a well-integrated landscape strategy. c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. d) Design surface and foul water drainage to include all required measures arising from the site being in Groundwater Source Protection Zone 2. 	Modified to reflect number of units as a minimum of 30 necessary to ensure consistent with national policy and optimising density. Use class reference removed, Part a amended to clarify how access to the site will be achieved. Part d removed to reflect correct mapping data, Part e amendment to reference correct policy. Necessary changes made for effectiveness of the policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>e) d) Undertake archaeological investigations in accordance with policy DM1345, taking account of the site's location within an Area of High Archaeological Potential.</p> <p>f) e) Provide suitable noise attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from traffic on the A24 Ewell Bypass.</p>	
MM26	51	Policy SA18	<p>Policy SA18 – Land to the Rear of Rowe Hall</p> <p>Allocated for: Extra Care Accommodation (Class C2) comprising 96 self contained apartments, staff and communal facilities.</p> <p>Site Area: 1.237ha</p> <p>Planning history: Outline Planning Application Granted June 2024 Reference: EP23/00633/CMA</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ol style="list-style-type: none"> Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from the Salisbury Road. Provide a revised Scouts Hut curtilage to include a new <u>parking</u> amenity area <u>incorporating the shared access way</u>. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. 	Use class reference removed, part a and e modified to address site specific vehicular access and transport needs, part b modified to improve clarity on access arrangements and parking provision. Modified c and new part f. All of the above changes necessary for effectiveness of the policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>d) Maximise the retention and safeguarding of existing mature trees within the site and incorporate those features in a coherent landscaping strategy for the site.</p> <p>e) <u>Facilitate access to public transport including bus or other public transport services including facilities that encourage public transport use.</u></p> <p>f) <u>Undertake and submit an appropriate desk-based assessment and written scheme of investigation due to the site's location within an Area of High Archaeological Potential.</u></p>	
MM27	52	Policy SA19	<p>Policy SA19 – 7 Station Approach</p> <p>Allocated for: Approximately A minimum of 5 8 dwellings (C3)</p> <p>Site Area: 0.04ha</p> <p>Planning history: Application reference 21/01156/FUL Redevelopment to provide 13 residential units (Class C3) within a part 3, part 4 storey building (refused) 25/00404/FUL Mixed use redevelopment for commercial units and 9 residential units (permitted)</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ol style="list-style-type: none"> Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site. Design surface and foul water drainage to include all required measures arising from the site being located in a Groundwater Source Protection Zone <u>3</u>. 	Modified to reflect number of units as a minimum of 8 necessary to ensure consistent with national policy and optimising density. Use class reference, addition of 'application reference' wording and updated application to latest permission, part a) addressing site specific vehicular access and transport needs, part b added Groundwater Source Protection Zone number, all changes necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM28	53	Policy SA20	<p>Policy SA20 – Esso Express, 26 Reigate Road</p> <p>Allocated for: Approximately A minimum of 10 dwellings (C3) Site Area: 0.25ha Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide <u>safe and appropriate</u>: <ul style="list-style-type: none"> i) vehicle, pedestrian and cycle access <u>from the Ewell By-Pass.</u> ii) <u>pedestrian and cycle access from Reigate Road.</u> b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. c) Ensure the site layout maximises retention and safeguarding of mature existing trees, incorporating these in a coherent landscaping strategy for the site. d) Undertake archaeological investigations in accordance with Policy DM1315, taking account of the site's location within an Area of High Archaeological Potential. 	Modified to reflect number of units as a minimum of 10 necessary to ensure consistent with national policy and optimising density. Use class reference, part a to provide clarity as to where access is to be achieved from, part d amendment to reference correct policy. Necessary changes made for effectiveness
MM29	54	Policy SA21	<p>Policy SA21 – Richards Field Car Park</p> <p>Allocated for: Approximately A minimum of 7 dwellings <u>and the retention of a minimum of 7 public car parking spaces.</u> Site Area: 0.07ha</p>	Modified to reflect the number of units as a minimum of 7 necessary to ensure consistent with national policy and optimising density. Amendment

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Chessington Road. b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. 	to the allocation to specify the retention of some parking on the site. Part a addressing site specific vehicular access and transport needs modified for clarity, Necessary changes made for effectiveness of the policy
MM30	55	Policy SA22	<p>Policy SA22 – Etwelle House, Station Road</p> <p>Allocated for: Approximately A minimum of 20 dwellings (C3)</p> <p>Site Area: 0.2ha</p> <p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Station Approach <u>whilst ensuring the safety of users of the adjoining railway station.</u> b) Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied. c) Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining railway station and railway line. 	Modified to reflect the number of units as a minimum of 20 necessary to ensure consistent with national policy and optimising density. Use class reference removed, part a addressing site specific vehicular access and added reference to adjoining railway station. Necessary changes made for clarity and effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM31	56	Policy SA23	<p>Policy SA23 – 140-142 Ruxley Lane</p> <p>Allocated for: Approximately 12 dwellings (C3) Site Area: 0.2ha Planning history: 23/00588/FUL – Redevelopment into 14 dwellings (Granted) In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide appropriate vehicle, pedestrian and cycle access from Ruxley Lane. b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. c) Ensure the site layout maximises retention and safeguarding of mature existing trees, incorporating these in a coherent landscaping strategy for the site. 	Policy deleted as the site is almost complete
MM32	57	Policy SA24	<p>Policy SA24 – Garages at Somerset Close & Westmorland Close</p> <p>Allocated for: Approximately A minimum of 6 dwellings (C3) Site Area: 0.10ha Planning history: Multiple applications for the redevelopment of garages to 6 flats (20/01758/FUL – 20/01760/FUL Application references: 23/00188/FUL, 23/00192/FUL & 23/00193/FUL (refused) In addition to complying with the policies in the plan, any developer of this site will be required to:</p>	Modified to reflect the number of units as a minimum of 6 necessary to ensure consistent with national policy and optimising density. Use class reference removed, addition of ‘application reference’ wording. Amendment to correct planning applications references, part a addressing site specific vehicular access and transport needs, necessary for clarity and effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<ul style="list-style-type: none"> a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access <u>from Somerset Close and Westmorland Close</u>. b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. 	
MM33	58	Policy SA25	<p>Policy SA25 – 64 South Street Epsom</p> <p>Allocated for: Approximately <u>A minimum of</u> 10 dwellings Site Area: 0.14ha Planning history: Application reference 20/00041/FUL - COU from B1 to 6 dwellings (lapsed)</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide <u>safe and</u> appropriate: <ul style="list-style-type: none"> i) vehicle, pedestrian and cycle access <u>from Saint Margaret Drive</u>; ii) <u>pedestrian and cycle access</u> from South Street (A24). b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. c) Design surface and foul water drainage to include all required measures arising from the site being located in <u>Groundwater</u> Source Protection Zone 1. 	Capacity revised and reflected as a minimum necessary to ensure consistent with national policy and optimising density.. Addition of ‘application reference’ wording. Part a addressing site specific vehicular access and transport needs, part c addition of ‘groundwater’, part d amendment to reference correct policy. Part e Additional text all necessary for the policy to be effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>d) Undertake archaeological investigations in accordance with Policy DM1315, taking account of the site's location within an Area of High Archaeological Potential.</p> <p>e) Conserve and, where possible, or enhance the setting of the Woodcote Conservation Area and the adjacent Grade II listed Abel Cottages <u>through sensitive design incorporating positive elements of local character and appearance.</u></p>	
MM34	59	Policy SA26	<p>Policy SA26 – 35 Alexandra Road Allocated for: Approximately A minimum of 8 dwellings (C3) Site Area: 0.10ha Planning history: Application reference: 21/01920/FUL - 9 flats (withdrawn)</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide appropriate <u>and safe</u> vehicle, pedestrian and cycle access to the site <u>from Alexandra Road.</u> b) Ensure the site layout maximises retention and safeguarding of mature existing trees, including the tree covered by a Tree Preservation Order, incorporating these in a coherent landscaping strategy for the site. c) Design surface and foul water drainage to include all required measures arising from the site being located in <u>Groundwater</u> Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16. 	Modified to reflect the number of units as a minimum of 8 necessary to ensure consistent with national policy and optimising density. Use class reference removed, addition of 'application reference' wording, part a amendment to reference the road access is to be achieved from, part c addition of 'Groundwater' and removal of reference to policy S16, all changes necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM35	60	Policy SA27	<p>Policy SA27 – 22-24 Dorking Road</p> <p>Allocated for: Approximately A minimum of 18 dwellings Site Area: 0.12ha Planning history: Application reference: 19/01365/FUL - Demolition and erection of 20 flats (refused)</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ol style="list-style-type: none"> Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Dorking Road <u>and /</u> or White Horse Drive. Conserve and, where possible or enhance the setting of the Grade II* and Grade II listed buildings in close proximity to the site <u>through sensitive design incorporating positive elements of local character and appearance.</u> 	Modified to reflect the number of units as a minimum of 18 necessary to ensure consistent with national policy and optimising density. Addition of 'application reference' wording. Part a addressing site specific vehicular access and transport needs modified for clarity, part b additional text regarding design, all necessary effectiveness
MM36	61	Policy SA28	<p>Policy SA28 – 63 Dorking Road</p> <p>Allocated for: A minimum of 6 dwellings (C3) Specialist Care Home (C2) with ancillary nurses accommodation (equivalent to 6 net C3 dwellings) Site Area: 0.14ha Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ol style="list-style-type: none"> Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Hylands Mews. 	Modified to reflect the number of units as a minimum of 6 necessary to ensure consistent with national policy and optimising density. Allocate for general residential use. Use class reference removed, part) addressing site specific vehicular access and transport needs modified, part b To specify that the existing structure is to be retained and converted and additional design

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>b) Retain and convert Conserve and enhance the part of the building that is Grade II Listed.</p> <p>c) Conserve or and enhance the setting of the Grade II Listed buildings adjoining the site <u>through sensitive design incorporating positive elements of local character and appearance.</u></p>	related text at part c all necessary for effectiveness
MM37	62	Policy SA29	<p>Policy SA29 – 65 London Road</p> <p>Allocated for: Care home up to 81 bedrooms (use class G2)</p> <p>Site Area: 0.30ha</p> <p>Planning history: 23/00817/FUL (approved, but not implemented), 22/00728/FUL (approved, but not implemented) and 20/01079/FUL (approved, but not implemented)</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>a) Provide appropriate vehicle, pedestrian and cycle access to the site from London Road.</p> <p>b) Design surface and foul water drainage to include all required measures arising from the site being located in Source Protection Zone 2, as well as meeting the requirements for sustainable drainage in Policy S16.</p> <p>c) Conserve and, where possible, enhance the setting of the Grade II listed buildings in close proximity to the site.</p>	Policy deleted as permission being implemented

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM38	63	Policy SA30	<p>Policy SA30 – Epsom General Hospital</p> <p>Allocated for: A minimum of approximately 305 units older people's accommodation (Use Class G2), 24 key worker dwellings (G3) and community uses, a children's nursery (Use Class E)</p> <p>Site Area: 1.45ha</p> <p>Planning history: Application reference: 21/00252/FUL (granted at appeal, development commenced), 20/00108/FUL (approved) and 19/01722/FUL (refused)</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide <u>safe and appropriate</u> vehicle, pedestrian and cycle access to the site from Woodcote Green Road. b) <u>Provide offsite highway improvements:</u> <ul style="list-style-type: none"> i) <u>along Woodcote Green Road to improve safety and public transport infrastructure</u> ii) <u>along Dorking Road to improve public transport infrastructure</u> bc) Satisfy the requirements for sustainable drainage in Policy S16. 	Capacity expressed as a minimum, necessary to ensure consistent with national policy and optimising density. Use classes removed, part a addressing site specific vehicular access and transport needs, part c new wording to specifically reference highway improvements and bus infrastructure. All necessary for the policy to be effective
MM39	64	Policy SA31	<p>Policy SA31 – Land at West Park Hospital (South)</p> <p>Allocated for: Approximately A minimum of 50 dwellings (G3)</p> <p>Site Area: 1.81ha</p>	Modified to reflect the number of units as a minimum of 50 necessary to ensure consistent with national policy and

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>from Richmond Crescent</u>. b) <u>Establish a legal mechanism to secure or enhance service frequency of bus services operating in the vicinity of the site to ensure connectivity to the wider area.</u> b)c) Establish a legal mechanism for long term management of green infrastructure, providing access for recreational purposes by the general public as well as residents of the development. c)d) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. d)e) Conserve and, where possible, or enhance the setting of the West Park Conservation Area <u>through sensitive design incorporating positive elements of local character and appearance.</u> e)f) Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees, 	<p>optimising density. Remove use class reference, amend part a addressing site specific vehicular access and transport needs modified for clarity, amendment part c,d and g all necessary for effectiveness</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>incorporating these in a coherent landscaping strategy for the site.</p> <p>f)g) Undertake archaeological investigations in accordance with Policy DM13+5, taking account of the site's location within an Area of High Archaeological Potential.</p>	
MM40	65	Policy SA32	<p>Policy SA32- Land at West Park Hospital (North)</p> <p>Allocated for: Approximately A minimum of 1850 dwellings (C3)</p> <p>Site Area: 5.22 ha</p> <p>Planning History: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>a) Provide <u>safe and appropriate vehicle, pedestrian and cycle access to the site from the existing hospital access road.</u> and enable the site to be served by public transport</p> <p>b) <u>Establish a legal mechanism to secure or enhance service frequency of bus services operating in the vicinity of the site to ensure connectivity to the wider area</u></p> <p>bc) Provide permeability through the site for pedestrians and cyclists into and from development to provide</p>	Modified to reflect the number of units as a minimum of 180 necessary to ensure consistent with national policy and optimising density. Use class reference removed, part a addressing site specific vehicular access and transport modified, part b wording to specifically reference bus infrastructure, part e amended to reference the water tower, part g amendment to reference correct policy. All necessary for the policy to be positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>connectivity between adjoining residential areas and Horton County Park.</p> <p>ed) Establish a legal mechanism for long term management of green infrastructure, providing access for recreational purposes by the general public as well as residents of the development.</p> <p>de) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>ef) Conserve and, where possible, or enhance the setting of the West Park Conservation Area and <u>Grade II listed water tower</u> that lies to the south of the site <u>through sensitive design incorporating positive elements of local character and appearance.</u></p> <p>fg) Ensure that site layout that retains and safeguards existing mature trees as part of a coherent landscaping strategy for the site.</p> <p>gh) Undertake archaeological investigations in accordance with policy DM1315, taking account of the site's location within an Area of High Archaeological Potential</p>	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM41	66	Policy SA33	<p>Policy SA33- Land at Chantilly Way</p> <p>Allocated for: Approximately A minimum of 30 dwellings (C3)</p> <p>Site Area: 0.7 ha</p> <p>Planning History: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Chantilly Way. b) <u>Provide off site improvements to Chantilly Way to improve connectivity from the site to adjacent site allocation SA35 to improve access to bus services.</u> bc) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. c) Conserve and, where possible, enhance the setting of <u>Grade II Listed Horton Farm House that lies beyond the site boundary to the North West.</u> d) Minimise the loss of existing trees, including appropriate root protection for those immediately adjacent to the site. <u>e</u>) Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric. 	Modified to reflect number of units as a minimum of 30 dwellings necessary to ensure consistent with national policy and optimising density. Use class reference removed, part a addressing site specific vehicular access and part b additional criteria added to require public transport connectivity particularly bus infrastructure, removed criteria c reference to heritage asset, not relevant for this site, all changes necessary for effectiveness of the policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM42	67	Policy SA34	<p>Policy SA34- Hook Road Arena</p> <p>Allocated for: New Sports Hub for <u>community use</u> in the borough to include playing pitches (grass and artificial), a new pavilion and changing facilities. The provision of <u>a minimum of approximately 100 dwellings</u> (C3) on the eastern part of the site.</p> <p>Site Area: 14 ha</p> <p>Planning History: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from the existing access on Hook Road. b) <u>Facilitate access to public transport including bus services operating within the vicinity of the site to ensure connectivity to the wider area.</u> b)c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 strategic Flood Risk Assessment. e)d) Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees, 	<p>Modified to reflect number of units as a minimum necessary to ensure consistent with national policy and optimising density. Use class reference removed, reference added to clarify that the intention is for the new sports hub to be for community use, amend part a addressing site specific vehicular access for clarity. All necessary to ensure the policy is positively prepared and effective</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>incorporating these in a coherent landscaping strategy for the site.</p> <p>d)e) Achieves a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.</p> <p>f) <u>enter a community use agreement in relation to the use of the sports hub.</u></p>	
MM43	68	Policy SA35	<p>Policy SA35 – Land at Horton Farm</p> <p>Allocated for: Approximately <u>A minimum of</u> 1,250 dwellings (C3) including some specialist housing and self-build plots, 10 gypsy and traveller pitches, business incubation space, community building and a public park of approximately 7ha in addition to other green and blue infrastructure.</p> <p>Site Area: 37.9 ha</p> <p>Planning History: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from <u>Chantilly Way and Horton Lane</u> and enable the site to be served by public transport</p> <p>b) <u>Establish a legal mechanism to secure bus services to serve the site in the long term, this should include the provision of supporting bus infrastructure including bus priority measures.</u></p>	<p>Modified to reflect the number of units as a minimum necessary to ensure consistent with national policy and optimising density. Use class reference removed, modified criteria a and b to ensure sustainable transport measures are adequately addressed and the policy is effective in this regard. Amend j to ensure it is positively prepared</p> <p>Changes necessary to ensure the policy is justified, effective and positively prepared</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>bd) Provide permeability through the site for pedestrians and cyclists into and from the development to provide connectivity <u>within the site and to between</u> adjoining residential areas and associated facilities <u>including Horton Local Centre and Horton County Park.</u></p> <p>ce) Provide a community building, capable of accommodating early years education provision and other community uses responding to the needs of the locality.</p> <p>df) Provide additional primary care capacity required to serve local needs. This could take the form of on-site provision integrated into a community building which accommodates primary health care provision alongside community health and wellbeing services required to meet the area's needs, or an equivalent financial contribution towards off-site provision of new or improvement to existing health facilities. The form of required additional primary care provision will be determined in consultation with the NHS at the time the site comes forward.</p> <p>eg) Provide a public park of approximately 7ha within the land to the North of the site incorporating walking, cycling routes, equestrian routes and measures for surface water management and biodiversity enhancement.</p> <p>fh) Establish a legal mechanism for long term management of green and blue infrastructure and children's play space on the site, providing access for</p>	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>recreational purposes by the general public as well as residents of the development.</p> <p>gi) Incorporate an area of approx. 0.6ha, with access to the highway and utilities connections, suitable for delivery of gypsy and traveller pitches (10 pitches).</p> <p>hj) The pitches will be public (tenure) forming part of the affordable housing contribution (1 pitch equates to 1 affordable home). Pitches should be serviced pitches, providing hard standing, amenity space and connections for drainage, electricity and water.</p> <p>ik) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>jl) Conserve and, where possible, or enhance the setting of Grade II Listed Horton Farm House <u>through sensitive design incorporating positive elements of local character and appearance.</u></p> <p>km) Ensure the site layout retains and protects veteran trees and maximises retention and safeguarding of other existing mature trees and hedgerows as part of a coherent landscaping strategy for the site.</p> <p>tn) Achieves a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.</p>	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM44	n/a	New site allocation SA36	<p>Policy SA36 – 25 Alexandra Road, Epsom</p> <p>Allocated for: A minimum of 10 dwellings Site Area: 0.2ha Planning history: Application references 16/00653/OUT, 16/00595/FUL & 16/00482/OUT (all approved)</p>  <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <ol style="list-style-type: none"> <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Alexandra Road.</u> <u>Maximise the retention and safeguarding of TPO mature trees within the site and incorporate those features in a coherent landscaping strategy for the site.</u> <u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u> <u>Ensure the re-use the stained-glass window from the locally listed building located on the site in any future</u> 	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			development proposals, in accordance with the previous planning approvals for the site.	
MM45	n/a	New site allocation SA37	<p>Policy SA37 – Gainsborough Road estate, Epsom</p> <p>Allocated for: A minimum of 8 dwellings Site Area: 0.26 ha Planning history: None</p>  <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <ul style="list-style-type: none"> a) <u>Provide safe and appropriate:</u> <ul style="list-style-type: none"> i) <u>vehicle, pedestrian and cycle access to the East parcel from Harvester Road</u> ii) <u>vehicle, pedestrian and cycle access to the West parcel from Gainsborough Road.</u> b) <u>Maximise the retention and safeguarding of TPO mature trees within and near the West parcel and incorporate those features in a coherent landscaping strategy for the site parcels.</u> 	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM46	n/a	New site allocation SA38	<p>Policy SA38 – Parking at 54 Gainsborough Road</p> <p>Allocated for: A minimum of 6 dwellings Site Area: 0.10 ha Planning history: Pre-application</p>  <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ol style="list-style-type: none"> Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Gainsborough Road. 	Additional allocation to ensure the plan is positively prepared and effective
MM47	n/a	New site allocation SA39	<p>Policy SA39 – 85b Hook Road, Epsom</p> <p>Allocated for: A minimum of 8 dwellings Site Area: 0.14 ha Planning history: None</p> 	Additional allocation to ensure the plan is positively prepared and effective

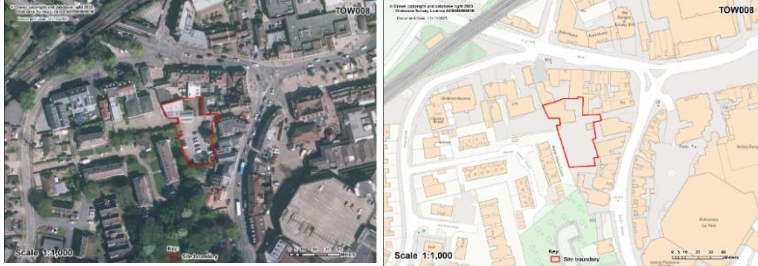
Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Hook Road.</u> b) <u>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</u> c) <u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u> 	
MM48	n/a	New site allocation SA40	<p>Policy SA40 – Land west of Ewell By-Pass</p> <p>Allocated for: A minimum of 38 dwellings Site Area: 0.87 ha Planning history: None</p>  <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p>	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<ul style="list-style-type: none"> a) <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from both Cheam Road to the south-west and Ewell By-Pass in the north-east.</u> b) <u>Maintain and enhance the footpath along the western edge of the site</u> c) <u>Ensure the site layout maximises retention and safeguarding of mature trees, incorporating these in a coherent landscaping strategy for the site.</u> d) <u>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</u> e) <u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u> f) <u>Conserve or enhance the significance and setting of the Ewell Village Conservation Area through sensitive design incorporating positive elements of local character and appearance.</u> 	
MM49	n/a	New site allocation SA41	<p><u>Policy SA41 – Conservative Club, Epsom Club and Church</u></p> <p><u>Allocated for:</u> Mixed use development for community uses (approximately 1,800sqm) and a minimum of 28 dwellings</p> <p><u>Site Area:</u> 0.35 ha</p> <p><u>Planning history:</u> No residential planning history</p>	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			 <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <ul style="list-style-type: none"> a) <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Church Street.</u> b) <u>Provide permeability through the site for pedestrians and cyclists and provide connections to the adjoining site allocation SA9 – Depot Road and Upper High Street Car Park.</u> c) <u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u> d) <u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u> e) <u>Maximise the retention and safeguarding of the protected mature tree within the site and incorporate this feature in a coherent landscaping strategy for the site.</u> 	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			f) <u>Conserve or enhance the setting of the Church Street Conservation Area and Listed Building that adjoin the site, through sensitive design incorporating positive elements of local character and appearance.</u>	
MM50	n/a	New site allocation SA42	<p>Policy SA42 – TK Maxx</p> <p>Allocated for: Mixed use development to provide retail and leisure uses (approx. 3,750 sqm) and a minimum of 17 dwellings</p> <p>Site Area: 0.14 ha</p> <p>Planning history: None</p>  <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <ul style="list-style-type: none"> a) <u>Provide safe and appropriate:</u> <ul style="list-style-type: none"> i) <u>pedestrian and cycle access to the site from Epsom High Street;</u> ii) <u>vehicle, pedestrian and cycle access from Station Approach.</u> b) <u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the</u> 	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p><u>site's location within an Area of High Archaeological Potential</u></p> <p>c) <u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u></p> <p>d) <u>Retain active ground floor retail frontages along the parts of the site that front the High Street and form part of the Primary Shopping Area for the Town Centre.</u></p> <p>e) <u>Consider the site's prominent Town Centre location for a high-quality designed building.</u></p> <p>f) <u>Conserve or enhance the setting and significance of the Epsom Town Centre conservation area and nearby listed buildings, through sensitive design incorporating positive elements of local character and appearance.</u></p> <p>g) <u>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</u></p>	
MM51	n/a	New site allocation SA43	<p><u>Policy SA43 – Land R/O The Albion Public House (McCaffertys Bar)</u></p> <p><u>Allocated for:</u> <u>Mixed use development, a minimum of 11 dwellings and approximately 500sqm commercial, business or service floorspace</u></p> <p><u>Site Area:</u> <u>0.14 ha</u></p> <p><u>Planning history:</u> <u>None</u></p>	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			 <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <ul style="list-style-type: none"> a) <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from South Street.</u> b) <u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u> c) <u>Conserve or enhance the setting and significance of the Epsom Town Centre Conservation Area and the adjacent and nearby Listed Buildings through sensitive design incorporating positive elements of local character and appearance.</u> d) <u>Retention of the Grade II listed wall that forms part of the site boundary.</u> e) <u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u> 	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM52	n/a	New site allocation SA44	<p><u>Policy SA44 – Spread Eagle Shopping Centre</u></p> <p><u>Allocated for:</u> Mixed use development to provide retail and leisure uses (approximately 2,000sqm) and student accommodation (a minimum of 40 units)</p> <p><u>Site Area:</u> 0.18 ha</p> <p><u>Planning history:</u> Pre-application</p>  <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <ul style="list-style-type: none"> a) <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Council owned car park and Town Hall to the east of site. Provide or maintain pedestrian access to the site from High Street, Ashley Road and/or The Parade.</u> b) <u>Retain active ground floor retail frontages along the parts of the site that front The Parade, Ashley Road and High Street and form part of the Primary Shopping Area for the Town Centre.</u> c) <u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the</u> 	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p><u>site's location within an Area of High Archaeological Potential.</u></p> <p>d) <u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u></p> <p>e) <u>Conserve or enhance the setting and significance of the Epsom Town Centre Conservation Area and the Grade II listed 'Spread Eagle Hotel' and 'No 89 High Street' located within the site through sensitive design incorporating positive elements of local character and appearance.</u></p> <p>f) <u>Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the A24 and neighbouring uses.</u></p> <p>g) <u>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</u></p>	
MM53	n/a	New site allocation SA45	<p><u>Policy SA45 – Auction House, Depot Road</u></p> <p><u>Allocated for:</u> Mixed use development to provide commercial, business and service floorspace (approximately 500sqm) and a minimum of 10 dwellings</p> <p><u>Site Area:</u> 0.12 ha</p> <p><u>Planning history:</u> None</p>	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			 <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <ol style="list-style-type: none"> <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Depot Road.</u> <u>Provide permeability through the site for pedestrians and cyclists and provide connections into the adjoining site allocation SA9 – Depot Road and Upper High Street Car Park.</u> <u>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</u> <u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u> 	
MM54	n/a	New site allocation SA46	<p><u>Policy SA46 – Laine Theatre Arts</u></p> <p><u>Allocated for:</u> A minimum of 6 dwellings</p> <p><u>Site Area:</u> 0.05 ha</p> <p><u>Planning history:</u> None</p>	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			 <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <ol style="list-style-type: none"> <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from East Street.</u> <u>Conserve or enhance the setting of nearby heritage assets, including the adjacent Adelphi Road Conservation Area and the Grade II listed building (Flint Cottage), through sensitive design incorporating positive elements of local character and appearance.</u> <u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u> <u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u> 	
MM55	n/a	New site allocation SA47	Policy SA47 – Eclipse Business Park, West Hill	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>Allocated for: Mixed use development to provide commercial, business and service floorspace (approximately 1,500sqm) and a minimum of 23 dwellings</p> <p>Site Area: 0.39 ha</p> <p>Planning history: Historic application for 30 flats</p>  <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ol style="list-style-type: none"> <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from West Hill.</u> <u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u> <u>Conserve or enhance the setting and significance of the Stamford Conservation Area which covers part of the site, through sensitive design incorporating positive elements of local character and appearance.</u> 	
MM56	n/a	New site allocation SA48	Policy SA48 – Cuddington Glade	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>Allocated for: Residential Care Home providing at least 70 bedrooms Site Area: 0.52 ha Planning history: Application reference 26/00002/FUL (awaiting determination)</p>  <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ol style="list-style-type: none"> <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Cherry Tree Lane bordering the western boundary of the site.</u> <u>Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees both within and beyond the site boundary, incorporating these in a coherent landscaping strategy for the site.</u> <u>Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.</u> 	
MM57	n/a	New site allocation SA49	<p>Policy SA49 – Land off Cuddington Glade</p> <p>Allocated for: Minimum of 45 dwellings Site Area: 1.11 ha</p>	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>Planning history: None</p>  <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <ul style="list-style-type: none"> a) <u>Provide safe and appropriate:</u> <ul style="list-style-type: none"> i) <u>vehicle, pedestrian and cycle access to the site from Cuddington Glade that does not result in the loss of any existing parking provision to serve the established residential dwellings that adjoin the site;</u> ii) <u>pedestrian and cycle access to the site from the established footpath bordering the site to the North.</u> b) <u>Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees, incorporating these in a coherent landscaping strategy for the site.</u> 	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			c) <u>Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.</u>	
MM58	n/a	New site allocation SA50	<p><u>Policy SA50 – Land at Priest Hill</u></p> <p><u>Allocated for:</u> Residential-led mixed use development for a minimum of 275 dwellings, commercial and/or community uses (approximately 1,000 sqm) along with a landscaped station square</p> <p><u>Site Area:</u> 4.71ha</p> <p><u>Planning history:</u> Pre application (up to 530 dwellings, commercial floorspace, public open space)</p>  <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <ul style="list-style-type: none"> a) <u>Provide safe and appropriate:</u> <ul style="list-style-type: none"> i) <u>vehicle, pedestrian and cycle access to the site from Cheam Road and Banstead Road;</u> ii) <u>pedestrian and cycle access to Ewell East Station and pedestrian access to the other</u> 	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p><u>established public rights of way adjoining the site.</u></p> <p>b) <u>Provide permeability through the site for pedestrians and cyclists into and from the development to provide connectivity between adjoining residential areas, education institutions and Ewell East Station.</u></p> <p>c) <u>Maintain vehicular access for neighbouring users including NESCOL, the neighbouring sports pitches operated by SEFRC and residential properties fronting Cheam Road.</u></p> <p>d) <u>Provide off-site highway improvements along the Cheam Road Corridor and A24 junction to improve pedestrian and cycle infrastructure with a focus on reducing severance and improving safety & crossing opportunities.</u></p> <p>e) <u>Provide off-site improvements to the public rights of way that run adjacent to the railway line connecting Cheam Road and Reigate Road.</u></p> <p>f) <u>Provide financial contributions towards accessibility improvements at Ewell East Station.</u></p> <p>g) <u>Provide commercial and/or community uses (approximately 1,000 sqm) to provide a new community hub adjacent to the Ewell East Station to serve existing and future residents and station users.</u></p> <p>h) <u>Provide additional primary care capacity required to serve local needs. This could take the form of on-site provision integrated into a community building which</u></p>	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p><u>accommodates primary health care provision alongside community health and wellbeing services required to meet the area's needs, or an equivalent financial contribution towards off-site provision of new or improvement to existing health facilities. The form of required additional primary care provision will be determined in consultation with the NHS at the time the site comes forward.</u></p> <p>i) <u>The occupation of the development should be phased to align with the delivery of any necessary upgrades to water supply and waste water infrastructure.</u></p> <p>j) <u>Establish a legal mechanism for long term management of green and blue infrastructure and children's play space on the site, providing access for recreational purposes by the general public as well as residents of the development.</u></p> <p>k) <u>Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.</u></p>	
MM59	n/a	New site allocation SA51	<p><u>Policy SA51 – Downs Farm</u></p> <p><u>Allocated for:</u></p> <p><u>Land to the North of College Road:</u> <u>A minimum of 530 dwellings, employment hub, specialist school provision (up to 2.5ha) and public open space</u></p> <p><u>Land to the South of College Road:</u></p>	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p><u>Public open space with improved pedestrian and cycle connectivity to Epsom Downs Station and playing pitches and supporting facilities.</u></p> <p>Site Area: 27.66 ha (north), 17.92 ha (south)</p> <p>Planning history: None</p>  <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <p><u>Land to the North of College Road</u></p> <ul style="list-style-type: none"> a) <u>Provide safe and appropriate:</u> <ul style="list-style-type: none"> i) <u>vehicle, pedestrian and cycle access to the site from Reigate Road;</u> ii) <u>pedestrian and cycle access to the site from Longdown Lane and College Road.</u> b) <u>Establish a legal mechanism to secure frequent bus services to serve the site in the long term and provide</u> 	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p><u>supporting infrastructure including bus priority measures where feasible.</u></p> <p>c) <u>Provide permeability through the site for pedestrians and cyclists to provide connectivity between adjoining residential areas and the open space at land to the South of College Road to the south of the site.</u></p> <p>d) <u>Provide offsite highway improvements along Reigate Road and College Road to improve pedestrian and cycle infrastructure with a focus on improving safety and improving crossing opportunities.</u></p> <p>e) <u>Provide financial contributions towards improvements at Epsom Downs Station.</u></p> <p>f) <u>Conserve or enhance the setting of the Higher Green / Longdown Lane Conservation Area that lies to the north of the site and listed buildings located in close proximity to the site, through sensitive design incorporating positive elements of local character and appearance.</u></p> <p>g) <u>Ensure the site layout maximises retention and safeguarding of trees covered by Tree Preservation Orders and other existing trees, incorporating these in a coherent landscaping strategy for the site.</u></p> <p>h) <u>Provision of a new specialist school of up to 2.5ha on the site.</u></p>	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>i) <u>The occupation of the development should be phased to align with the delivery of any necessary upgrades to water supply and waste water infrastructure.</u></p> <p>j) <u>Provide suitable noise and vibration attenuation measures to ensure that future occupiers have an acceptable level of residential amenity given the existing adjoining business.</u></p> <p>k) <u>Provide additional primary care capacity required to serve local needs. This could take the form of on-site provision integrated into a community building which accommodates primary health care provision alongside community health and wellbeing services required to meet the area's needs, or an equivalent financial contribution towards off-site provision of new or improvement to existing health facilities. The form of required additional primary care provision will be determined in consultation with the NHS at the time the site comes forward.</u></p> <p>l) <u>Establish a legal mechanism for the long term management of green and blue infrastructure and children's play space on the site, providing access for recreational purposes by the general public as well as residents of the development.</u></p> <p>m) <u>Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.</u></p> <p><u>Land to the South of College Road</u></p>	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>n) <u>Provide public open space incorporating walking and cycling routes providing connections between College Road, Longdown Lane South and Epsom Downs Station.</u></p> <p>o) <u>Provide playing pitches and new supporting infrastructure including changing facilities that are served by utilities and car parking for users. Vehicular access should be secured from improvements to the existing access along College Road.</u></p>	
MM60	70	Para. 5.3.	<p>5.3. Table S5a below sets out the recommended mix of affordable and market homes for future developments in the borough over the Local Plan Period as set out in the HEDNA (Source: HEDNA, 2023, Table 66, p257).</p> <p><i>Move table S5a into main body of text as below:</i></p>	<p>Added source/reference to HEDNA table, necessary for effectiveness</p> <p>Table S5a concerning housing mix moved to the policy wording for effectiveness</p>
MM61	70	Policy S5	<p>Policy S5: Housing mix and type</p> <p>Residential development will be permitted where the following criteria are met: a) The mix of tenure, type and size reflects have regard to the housing need, set out in the Housing and Economic Development Needs Assessment (2023) as detailed below, unless the applicant can <u>demonstrate that other factors, such as site characteristics, local character and local housing need warrant an alternative approach. or any subsequent update;</u> and b) The housing mix has regard to the size, characteristics and location of the site.</p>	<p>It is necessary for effectiveness for the policy to specify the Housing Mix, the table S5 has been moved from the supporting text into the policy for effectiveness</p> <p>It is necessary for effectiveness to clarify criteria a and b. These have been combined and reworded</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification																				
			<p>Table S5a:Housing Mix</p> <table> <tr> <th>Tenure</th><th>1- bedroom</th><th>2- bedrooms</th><th>3- bedrooms</th><th>4+ bedrooms</th></tr> <tr> <td>Market</td><td>10%</td><td>35%</td><td>35%</td><td>20%</td></tr> <tr> <td>Affordable home ownership</td><td>20%</td><td>40%</td><td>30%</td><td>10%</td></tr> <tr> <td>Affordable housing (rented)</td><td>40%</td><td>35%</td><td>20%</td><td>5%</td></tr> </table> <p>Key supporting documents</p> <ul style="list-style-type: none"> <u>Housing and Economic Development Needs Assessment (2023)</u> 	Tenure	1- bedroom	2- bedrooms	3- bedrooms	4+ bedrooms	Market	10%	35%	35%	20%	Affordable home ownership	20%	40%	30%	10%	Affordable housing (rented)	40%	35%	20%	5%	New key supporting documents section added after Policy S5 necessary for effectiveness
Tenure	1- bedroom	2- bedrooms	3- bedrooms	4+ bedrooms																				
Market	10%	35%	35%	20%																				
Affordable home ownership	20%	40%	30%	10%																				
Affordable housing (rented)	40%	35%	20%	5%																				
MM62	71-72	Policy S6	<p>5.5. Housing affordability is a significant issue for Epsom and Ewell and is a key priority for the council. To help address the problem of affordability, the council is committed to enabling the provision of affordable housing for local people who cannot meet their housing needs on the open market. <u>Affordable housing may also include housing that is for essential local workers, which includes public sector employees such as NHS teaching staff. A full definition of affordable housing and essential local workers is provided in the glossary.</u></p> <p><i>New paragraphs inserted after para 5.7.</i></p> <p><u>The policy requires varying levels of affordable housing provision at an overall percentage of dependent upon the location of the development and</u></p>	It is necessary for effectiveness that reference has been added to staff accommodation and essential local workers housing																				

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>the use of the land to be developed as defined within the policy.</p> <p>5.14. Affordable homes must be integrated within proposed developments to help build and maintain balanced and mixed communities. However, the feasibility of managing and maintaining the affordable homes will also be given consideration when assessing the acceptability of their siting and distribution. <u>An example of where the Council may consider it appropriate to 'cluster' affordable dwellings together would be for flatted schemes where a registered provider would benefit from the affordable dwellings being located together for management and maintenance reasons.</u></p> <p>5.17. Policy S2 Sustainable and Viable development provides further detail on the approach the council will take in cases where development proposals are not fully policy compliant.</p> <p>Vacant building credit</p> <p><u>5.18. Vacant building credit, as described in national planning guidance, will be applied to developments where a vacant building is either converted or demolished and may result in a reduction in the required affordable housing. The credit does not apply when a building has been abandoned.</u></p>	<p>Additional supporting text necessary for effectiveness to set out how affordable housing on site should be distributed</p> <p>Modification necessary to correct policy title to ensure policy is positively prepared</p> <p>Delete as repeats national policy</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>Policy S6: Affordable Housing</p> <p>1) The council will require proposals to provide affordable homes on all residential developments comprising self-contained units, as follows:</p> <p>On greenfield sites</p> <p><u>On site allocations SA31, SA32, SA33, SA34, SA35, SA48, SA49, SA50, SA51 as defined on the policies map and on any green belt sites developed for housing in accordance with national policy:</u></p> <p>a) Schemes of 10 or more new units or where the site has an area of 0.5 hectares or more, on-site provision of at least 4550% affordable housing of the gross number of dwellings;</p> <p><u>On greenfield sites located within the defined urban area as identified on the policies map:</u></p> <p>ab) <u>Schemes 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;</u></p> <p>On all other sites</p> <p>bc) Schemes of 10 or more new dwellings or where the site has an area of 0.5 hectares or more, on-site</p>	<p>It is necessary for the policy to be modified to include text to specify the amount of affordable housing required on the site allocations contained within this plan and greenfield sites in order to be consistent with national policy. Whilst it is not envisaged that any other development on green belt sites would come forward, the text is necessary to reflect the affordable housing expectations identified by the Framework</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>provision of 30% affordable housing of the gross number of dwellings;</p> <p>2) Where a development meets the criteria detailed in 1), the preferred mix for affordable housing provision on-site is as follows:</p> <ul style="list-style-type: none"> • 30% affordable home ownership; • 70% affordable rented (with half to be secured as social rented) <p>3) 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;</p> <p>4) 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. <u>must be integrated within proposed developments to help build and maintain balanced and mixed communities. However, the feasibility of managing and maintaining the affordable homes will also be given consideration when assessing the acceptability of their siting and distribution;</u></p> <p>5) Affordable housing from proposals of 10 or more units shall be provided on-site. Only where it can be demonstrated that exceptional circumstances exist will provision for off-site provision be allowed or the</p>	<p>Reworded point 4 to reflect supporting text and ensure policy is justified</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>payment of a financial contribution made (equivalent in value to it being provided on-site).</p> <p>6) <u>The affordable housing requirements set out in this policy have been demonstrated to be viable through our Local Plan Viability Assessment. Policy S2 Viable Development provides details on where a site specific viability assessment may be accepted at the application stage.</u></p> <p>6)7) Where a site has been sub-divided or is not being developed to its full potential, to circumvent the affordable housing thresholds detailed in criteria 1, 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.</p> <p>7) In accordance with Policy S2, viability will only be considered in exceptional circumstances and where there are significant additional costs not anticipated through the viability evidence that has informed the Local Plan.</p> <p>Key supporting documents</p> <ul style="list-style-type: none"> • Housing and Economic Development Needs Assessment (2023) • Local Plan Viability Assessment (2023) • <u>Local Plan Viability Update Note (2024)</u> 	<p>It is necessary for additional text to clarify viability evidence in order to be effective and consistent with national policy</p> <p>For effectiveness added viability evidence under 'key supporting documents'</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM63	74-75	Policy DM1	<p>5.19. It is important that new homes are built to a high standard to meet the 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, climate change and pressure they put on water supply. As such, this policy should be read in conjunction with policy DM10 Building Efficiency <u>Emissions and Energy</u> Standards.</p> <p>Policy DM1: Residential Space Standards</p> <p>1) Proposals for new residential dwellings (Use Class C3) will be permitted where:</p> <p>a) the internal space complies with or exceeds the nationally described space standards or any future equivalent.</p> <p>b) the minimum requirements for private outdoor space as set out below are satisfied:</p> <p>i) a 5 sq m balcony within flatted development accessible from the main habitable room</p> <p>ii) a dedicated private garden for houses.</p> <p>Parts 2 and 3 (i) and (ii) of the policy remain the same</p> <p>Key supporting documents</p> <ul style="list-style-type: none"> • Technical housing standards- nationally described space standards- 	<p>Necessary for effectiveness in terms of the name change to policy DM10</p> <p>Necessary for effectiveness to remove the use classes to future proof the policy</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<ul style="list-style-type: none"> • <u>Statutory guidance - Technical housing standards- nationally described space standards</u> • Approved Document M – Access to and use of buildings Volume 1: dwellings • <u>Statutory guidance – Access to the use of Buildings- Approved Document M</u> 	References to the documents are set out in full for effectiveness
MM64	78-79	Policy S7	<p>5.31. Some housing may need to be designed for people with specialist needs. This includes older citizens, those with disabilities and , the neurodiverse; students or families more suited to multi-generational communal living.</p> <p>5.33. Evidence on how this translates to need for the required number of specialist homes or <u>care home</u> bed spaces for older people varies, notably between figures provided by Surrey County Council (SCC) and the calculations provided by the independent consultants who produced the HEDNA.</p> <p>5.34. SCC predicts an oversupply of market extra care units and a <u>minimum</u> need for 75146 affordable extra care units up to 2035. <u>With respect to care home provision, SCC predicts an undersupply of 185 residential care home beds and an undersupply of 149 nursing home beds, based upon operational care home provision as at January 2024. SCC publish up to date figures for need in their Commissioning Statement which should be considered at the time of submitting a planning application, and 355 nursing</u></p>	<p>Necessary for effectiveness, and to ensure that the policy uses appropriate definition for specialist housing</p> <p>Necessary for effectiveness to include appropriate definitions & specialist care provision</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>home beds. The HEDNA suggests that a mid point between the SCC figures and its outputs (which arose due to a difference in prevalence rates) be used as the actual need figure, which is 308 residential units and 180 nursing care beds.</p> <p>Policy S7: Specialist Housing</p> <p>1) Development proposals for specialist accommodation, such as homes for older people, people with disabilities <u>and</u> students or the neurodiverse will be permitted where:</p> <ul style="list-style-type: none"> a) there is robust evidence to support that it meets an identified need in the borough; b) an appropriate tenure mix is provided (where applicable); c) sites have good access to facilities, services and public transport; d) they 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; <u>and</u> 	<p>Necessary for effectiveness text modified with regard to specialist housing definition</p> <p>Deletion of criteria g and h as not necessary to make policy effective and justified</p> <p>Modified part 2 to be more effective and removed use class to ensure policy is consistent with national policy</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>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.</p> <p>g) it can be demonstrated that revenue funding can be secured to maintain the long-term viability of the scheme; and</p> <p>h) the scheme is supported by the relevant statutory agencies.</p> <p>2) Larger-scale new residential developments (over 200 €3 dwellings) will be required to incorporate <u>some</u> specialist accommodation, in line with the above criteria 1, unless there is reasonable evidence that it is not feasible.</p> <p>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 equivalent alternative provision is being made available locally through replacement or new facilities.</p>	
MM65	80	Policy DM3	5.39. 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	Necessary for effectiveness to remove use classes to future proof the policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>there are exceptional circumstances that might justify their loss.</p> <p>5.40. 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.</p>	
MM66	82-85	Policy S8	<p>Transit accommodation provision</p> <p>5.49. The provision of transit accommodation on well-travelled routes across Surrey can help reduce incidences of unauthorised encampments. Careful consideration should be given to the location of a transit site to ensure it is on a well-established travelling route. Policy S8 therefore sets the criteria that will be used to determine applications for transit use on unallocated land.</p> <p>Assessing applications for Gypsy and Traveller provision</p> <p>5.50. It is recognised that there are unlikely to be sites which would meet every one of the criteria detailed in Policy S8. A 'best fit' approach will therefore be adopted.</p> <p>5.51. It is expected that new pitches and plots should have adequate utility services, amenity space and parking, safe turning space and be in areas with reasonable access to schools, health services and local services. The impact of new sites on existing communities and how well proposals</p>	<p>Amended text for clarity and effectiveness</p> <p>Necessary for clarity and effectiveness to reword and remove 'transit'</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>can be integrated is an important consideration in the determination of applications for Gypsy and Traveller provision.</p> <p>5.53. 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). It is recognised that on occasion, such as family and community events, there may be visitors to gypsy, traveller and showpeople sites which could exceed the permitted number of caravans on a site. Therefore, planning conditions will be used specifying the number of days the site can be occupied by more than the permitted number of caravans.</p> <p>Policy S8: Gypsies, Travellers and Travelling Showpeople</p> <p>Safeguarding existing supply</p> <p>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.</p>	<p>Modified Criteria f) to be worded positively around appropriate landscaping.</p> <p>Additional detail about access to utilities provided in Part 4) for clarity, remove criteria from part 4 C, not relevant, criteria 2f has been amended for conciseness, remove part 5 as covered by part 1. All necessary for effectiveness</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>Planning applications</p> <p>2) Development proposals for gypsy and traveller and travelling showpeople accommodation and ancillary buildings, will be permitted where:</p> <p>a) The use of the land is of a scale appropriate to the location;</p> <p>b) the site is capable of being provided with necessary on-site services;</p> <p>c) the site is conveniently located for access to schools, medical services and other community facilities;</p> <p>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;</p> <p>e) the site provides adequate space for storage, play and residential amenity;</p> <p>f) the site is appropriately not enclosed with hard landscaped, high walls or fences, to an extent that suggests deliberate isolation from the community;</p> <p>g) the use of the land will not result in an unacceptable adverse impact upon local amenity, the existing</p>	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>character of the area and the natural and historic environment; and</p> <p>i) ancillary buildings are of an appropriate scale and size.</p> <p>3) Proposals for mixed residential and business activities will be assessed on a site-specific basis, taking the above criteria into account.</p> <p>4) Proposals for transit gypsy and traveller accommodation will be permitted where the proposal:</p> <p>a) complies with the above <u>Part 2</u> criteria (except for c, <u>e, f and h</u>);</p> <p>b) can demonstrate it is located on an established travelling route.</p> <p>c) <u>provides basic utilities including those for the supply of water and disposal of waste water.</u></p> <p>c) 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).</p> <p>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.</p>	<p>The Plan will meet the identified need through the site allocations proposed. As a result, this text is not necessary</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>Meeting future needs within larger unallocated development sites</p> <p>65) To meet the needs of Gypsy and Traveller households, accommodation will be expected to be provided on development sites of 200 G3 homes or more whilst there remains an identified unmet need within the borough. Where application sites are within Epsom Town Centre (as defined on the policies map) or the inclusion of Gypsy and Traveller accommodation can be demonstrated to have a significant negative impact on the efficient use of land, provision will not be expected. This will need to be robustly demonstrated.</p> <p>76) The number of pitches and plots required will reflect the level of local need within the borough. However, sites will have a minimum of 3 pitches/plots and should contain the maximum number of pitches/plots that can reasonably be accommodated on the site.</p>	
MM67	86	Policy S9	<p>6.1. At a strategic level, the Local Plan promotes sustainable economic development within the borough and the surrounding region (e.g. the “Gatwick Diamond”). However, for the purposes of this policy, economic development concerns mostly developing employment opportunities and improving prosperity for all in the borough. The council has carried out a robust and objective assessment of its employment needs which is detailed in the HEDNA. This assessment takes account of economic and job growth forecasts over the Local Plan period, but also</p>	Necessary for clarity to modify supporting text setting out the general strategy of intensification and new development where possible to ensure the policy is positively prepared and justified

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p><u>local intelligence on demand for employment floorspace to meet the needs of established businesses. The HEDNA shows that there is demand for at least 41,464sqm of additional employment floorspace in the borough to meet the needs of existing businesses and to cater for new businesses.</u></p> <p><i>6 new paragraphs inserted after para. 6.1.</i></p> <p><u>The Council has also carried out a retail needs assessment which concludes that there is no identified need to plan for additional convenience and comparison goods retail floorspace provision.</u></p> <p><u>Epsom Town Centre contains concentrations of office accommodation in addition to other employment generating uses such as retail, health and education provision which make a significant contribution towards the borough's economy.</u></p> <p><u>Kiln Lane and Longmead Industrial Estates are the two largest employment sites, providing approximately 25ha of employment land between them. Although the majority of uses at the site are industrial, warehousing & storage and distribution, they also accommodate some 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 counters.</u></p>	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p><u>The HEDNA recommends securing warehousing and general industrial floorspace supply in key industrial estates of the borough and ensuring the appropriate type and size office accommodation is provided (generally smaller serviced office accommodation. This is to meet future needs for employment floorspace over the Local Plan period.</u></p> <p><u>To help support a prosperous economy, this policy designates Kiln Lane and Longmead Industrial Estates as strategic employment sites (as defined on the policies map) which provides the highest degree of protection and actively encourages the development, regeneration and intensification of these sites to provide modern floorspace for employment generating uses.</u></p> <p><u>The borough has a successful racehorse training industry associated with although separate from the Epsom Downs Racecourse, a nationally significant sporting venue. To ensure the long-term sustainability of these and address some of the challenges these industries face, it is important to safeguard land and support appropriate development proposals.</u></p> <p>6.2. <u>In this respect the key objective of the plan will be to make provision for a range of sites to meet the needs of different types of business and tourism, to encourage diversification in the local economy. Such</u></p>	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>diversification can include adapting to new ways of working, changing demands for services and the night-time economy. The borough has a vibrant cultural and creative sector, with an established theatre and two cinemas in Epsom Town Centre, and the University for the Creative Arts and Laine Theatre Arts and the Council is supportive of further developing this sector.</p> <p>Policy S9: Economic Development</p> <p>The sustainable growth of the borough's economy will be promoted to meet the needs of different sectors by:</p> <p>1) Supporting the regeneration of Epsom Town Centre by enabling new and established businesses to grow <u>Protecting and safeguarding the Strategic Employment sites at Kiln Lane and Longmead Industrial Estates (as defined on the policies map) for employment generating uses to support job creation and meet the needs of the economy. The development and intensification of these sites will be supported to provide floorspace for Employment Generating Uses that meets the needs of the market.</u></p> <p>2) Safeguarding strategic employment sites and encouraging the regeneration and intensification of land to meet the needs of the economy to support job creation and meet the needs of business. Supporting the</p>	<p>Necessary for clarity and effectiveness to define the two industrial areas in the policy</p> <p>Necessary for clarity and effectiveness to modify text to set out the strategy for the protection and intensification of the industrial sites</p> <p>Necessary for clarity and effectiveness to modify the wording of part 1 to be more specific, wording moved from policy DM7 which addresses the loss of employment land</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p><u>development of sites within Epsom Town Centre to provide floorspace that supports jobs creation and meets the needs of the economy. by enabling new and established businesses to grow;</u></p> <p>3) Safeguarding land and supporting appropriate <u>development proposals which help for the horse racing industry to secure the long-term sustainability of the sector; Epsom Down Racecourse and racehorse training sector.</u></p> <p>4) Supporting the visitor and night-time economy;</p> <p>5) Supporting the creative and cultural industries and further and higher education providers <u>by protecting existing and enabling the provision of new or extended venues and facilities where appropriate.</u>;</p> <p>6) Protecting existing cultural venues, facilities and uses where appropriate and supporting the development of new cultural venues in Epsom Town Centre.</p> <p><u>Key supporting documents</u></p> <ul style="list-style-type: none"> • <u>Housing and Economic Development Needs Assessment (2023)</u> • <u>Longmead and Kiln Lane Industrial Estates Economic Value Report (2022)</u> • <u>Retail and Commercial Leisure Needs Assessment Update (2021)</u> 	<p>Part 5 and 6 of the policy have been combined for effectiveness and also reworded for the same reason</p> <p>Necessary for clarity and effectiveness to ensure policy is positively prepared</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
				Added key supporting documents after the policy for consistency
MM68	87-88	Policy S10	<p>6.4. A strong town centre policy enables a full range of town centre uses to be implemented within these sustainable locations 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. Town centre uses include, <u>residential</u>, retail, leisure, entertainment facilities, intensive sport and recreation uses, offices, arts, culture and tourism development.</p> <p>Policy S10: Retail Hierarchy and Network</p> <p>1) 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 and <u>Neighbourhood Parades</u> (as</p>	<p>Necessary for clarity and consistency with national policy to define town centre uses</p> <p>Necessary to add reference to neighbourhood parades in order to make the plan effective</p>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<p>shown on the policies map). The wider retail network also includes other retailing locations across our area.</p> <p>2) The overall hierarchy and network is defined as follows:</p> <p>a) Town Centre: Epsom Town Centre</p> <p>b) Local Centres: Ewell Village and Stoneleigh Centre</p> <p>c) Neighbourhood Parades:</p> <ul style="list-style-type: none"> • 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 	

MM69	89	Policy DM4	<p>6.11. Within Epsom Town Centre, Commercial, Business and Service Uses (Class E of the use classes order) are protected within primary frontages on the ground floor. Within secondary frontages, other supplementary uses such as drinking establishments and hot food takeaways may also be appropriate to contribute to the diverse range of services offered in a town centre, however, the level of existing provision will be considered <u>at the planning application stage</u> to avoid over concentration of a specific type of use. <u>Proposals will be considered on their merits subject to the provision of sufficient information to assess the potential impacts on amenity, diversity, vitality and viability of the proposed use (including cumulative impacts).</u></p> <p>6.12. Within the local centres, a range of <u>Commercial, Business and Service Uses</u> Class E uses and other town centre uses will be supported and where the loss of a <u>Commercial, Business and Service Uses</u> Class E use is proposed, the proposed use will need to demonstrate that it maintains an active frontage and a range and mix of products and services in the centre and would not harm the vitality and viability of the local centre.</p> <p>Policy DM4: Primary Shopping Areas and Retail Frontages</p> <p>Epsom Town Centre</p> <p>1) Within Epsom Town Centre the Primary Shopping Area (as defined on the policies map), will remain the focus for retail activity and other town centre uses. Within the Primary Shopping Area:</p>	<p>Use classes removed for effectiveness, additional text provided in the supporting text to clarify how we would assess Policy Criteria1b over concentration</p> <p>Changes necessary in order to make the policy positively prepared and effective</p> <p>...</p>
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			<p>a) Within the primary frontage (as defined on the policies map) at ground floor level development within <u>Commercial, Business and Service Use</u> use Class E will normally be permitted;</p> <p>b) Within the secondary frontages (as defined on the Policies Map), at ground floor level, development within <u>Commercial, Business and Service Use</u> Use Class will normally be permitted. Sui Generis uses suited to a town centre, <u>Learning and non-residential Class F1 and Institutions and Halls or meeting places for the principal use of the local community Class F2(b)</u> will normally be permitted unless they result in an over concentration of those uses.</p> <p>c) Within the primary and secondary frontages, the effective and efficient use of upper floors for main town centre uses <u>and</u> or residential use, will be supported where it can be demonstrated that the loss of this floor space would not impact the viability of the ground floor use.</p> <p>2) Applications for the loss of <u>Commercial, Business and Service</u> Class E floorspace in the Epsom Town Centre Primary frontages will only be supported where it can be demonstrated that:</p> <p>a) There is no reasonable prospect of the site remaining in a <u>Commercial, Business and Service</u> Class E use;</p> <p>b) Opportunities to reconfigure or reuse the site to retain its current use or another <u>Commercial</u>,</p>	<p>Modified references to use classes in order to future proof the policy</p> <p>Necessary changes made in order to ensure the policy is effective</p>
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			<p>Business and Service Class E use have been exhausted;</p> <p>c) The site has been marketed in accordance with Appendix 5;</p> <p>d) The proposed alternative use would not adversely affect the vitality and viability of the town centre.</p> <p>Stoneleigh and Ewell Local Centres</p> <p>3) Within the Local Centres (as defined on the policies map) the Council will support:</p> <p>a) a A range of <u>Commercial, Business and Service uses</u> Use Class E and other appropriate town centre uses</p> <p>b) Development proposals involving a change of use from <u>Commercial, Business and Service use Class E</u> will not be permitted unless the alternative use maintains an active frontage and a range and mix of products and services in the centre and would not harm the vitality and viability of the local centre</p> <p>c) The efficient use of upper floors for main town centre uses or residential use where it can be demonstrated that the loss of this floor space would not impact the viability of the ground floor use</p>	
MM70	93-94	Policy DM6	<p>6.20. The boundaries of the neighbourhood parades are shown on the Policies Map.</p> <p>Policy DM6: Neighbourhood Parades and Isolated Shops</p> <p>1) Within the neighbourhood parades (<u>as defined on the Policies Map</u>), development proposals will be permitted providing they satisfy all of the following criteria:</p>	Not necessary – wording to be included within policy wording

			<p>a) they are appropriate to the scale and function of the parade</p> <p>b) they maintain or enhance the vitality and viability of the parade</p> <p>c) if at ground floor level:</p> <ul style="list-style-type: none"> 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; and iii) The proposal does not result in an over concentration of a particular use. <p>2) Residential development at first floor level or above will be supported, subject to having safe and convenient access and not inhibiting the functioning or viability of the ground floor use.</p> <p>3) The loss of main town centre uses at ground floor to other uses, 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.</p> <p>4) Proposals to change the use of isolated shops 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</p>	<p>Necessary to provide clarity and effectiveness, modified text to signpost to neighbourhood parades as defined in the policies map</p>
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MM71	95-96	Policy DM7	<p>Policy DM7 – <u>Loss of Employment Land</u></p> <p>6.24. The borough's employment sites make a valuable contribution towards supporting economic growth within the borough and wider sub region. There are a wide range of these employment sites dispersed <u>across the borough, both within the urban area and Green Belt (as defined on the policies map).</u> within the borough's urban area, with concentrations of office accommodation in Epsom Town Centre and the Local Centres.</p> <p>6.25. Kiln Lane and Longmead Industrial Estates are our two largest employment sites, providing approximately 25ha of employment land between them. Although the majority of uses at the site are industrial, warehousing & storage and distribution, they also accommodate some 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 counters.</p> <p>6.26. The HEDNA recommends securing warehousing and general industrial floorspace supply in key industrial estates of the borough and ensuring the appropriate type and size office accommodation is provided (generally smaller serviced office accommodation. This is to meet future needs for employment floorspace over the Local Plan Period.</p> <p>6.27. To help support a prosperous economy, the policy designates Kiln Lane and Longmead Industrial Estates as strategic employment sites (as defined on the policies map) which provides the highest degree of protection and actively encourages the development, regeneration and</p>	<p>Title modified, supporting text be modified to clarify it is specific to non-strategic employment sites outside of Longmead/Kiln Lane</p> <p>Deletion necessary to remove any unnecessary duplication from another policy</p> <p>Necessary for effectiveness</p>
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			<p>intensification of these sites to provide modern floorspace for employment generating uses.</p> <p>6.28. <u>Policy S9 defines the boroughs strategic employment sites, which are safeguarded for employment generating uses. However, there are a wide range of Employment areas outside of the defined strategic employment sites beyond the strategic employment sites that make a valuable contribution towards the economy of the borough and it is for this reason that the policy DM7 includes a criteria-based policy for assessing proposals that would result in the loss of employment floorspace.</u></p> <p>Policy DM7: Loss of Employment Land</p> <p>Strategic Employment Sites</p> <p>2) 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.</p> <p>3) The development and intensification of these sites will be supported to provide floorspace for Employment Generating Uses that meets the needs of the market.</p> <p>Outside of the Strategic Employment sites</p> <p>4) <u>1) The loss of floorspace occupied by employment-generating uses beyond the strategic employment sites as defined on the policies map within the urban area will be permitted where it is demonstrated that:</u></p>	<p>Deletion necessary to remove any unnecessary duplication from another policy</p>
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			<p>a) there are no strong economic reasons to retain the Employment Use;</p> <p>b) there is no reasonable prospect of the site being retained in employment use <u>evidenced by at least 12 months of continuous marketing evidence</u>; and</p> <p>c) the site is no longer suitable for its existing use or other employment uses.</p>	Added marketing period into the policy to ensure the policy is effective
MM72	97-98	Policy DM8	<p><u>Policy DM8 – Racehorse Training Zone Epsom Downs Racecourse and the Racehorse Training Industry</u></p> <p>6.31. The borough has <u>long been associated with horse racing, being home to Epsom Downs Racecourse, a nationally significant sporting venue, and a successful racehorse training industry. associated with the Epsom Downs Racecourse, a nationally significant sporting venue located within the Green Belt. The area is one of only two locations in the UK where both a racecourse and racehorse training co-exist. The Council is supportive of the industry, recognising its historic links with the area and the value it has to the local and wider economy. Policy S9 is reflective of this.</u></p> <p><u>Epsom Downs Racecourse is internationally renowned as the home of the Derby, flat racing’s ‘blue riband’ event and currently holds 11 racing fixtures per annum. While horseracing is the core activity, the racecourse also operates as a key meetings, conferences, events and functions venue, which is important to both its long-term</u></p>	Policy DM8 and the supporting text has been modified to accurately reflect the significance of the Racehorse training industry in Epsom which is necessary for effectiveness and to ensure the plan is positively prepared

			<p><u>economic viability and the local economy. The Racecourse Area is defined on the Policies Map.</u></p> <p>Surrounding the racecourse itself (as defined on the Policies Map) are the nationally important racehorse training grounds, <u>located in Epsom and Walton Downs</u> which make a positive contribution to the economy and sporting heritage of the area.</p> <p>6.32. There are several racehorse training facilities / stable complexes yards in the bBorough (and neighbouring boroughs) which are well-located to support the ongoing use of the training grounds, <u>at Epsom Downs. These sites and their associated training grounds, paddocks and fields are included within the Racehorse Training Zone defined on the Policies Map, within which any development proposals will be considered against, as well as all other relevant policies in the Local Plan. Both the racehorse training grounds and the racehorse training yards comprise the Racehorse Training Zone, which is defined on the Policies Map.</u></p> <p><u>The Racecourse Area and Racehorse Training Zone are located within the Green Belt.</u></p> <p><u>Epsom and Walton Downs, where the training grounds are located, are privately owned and are managed by the Epsom and Walton Downs Conservators through an Act of Parliament. The principal role of the Conservators is to:</u></p> <ul style="list-style-type: none"> <u>• Enable the training of racehorses on the Downs until midday</u> <u>• Preserve the Downs in their natural state of beauty</u> <u>• Maintain public rights of access</u> 	
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			<ul style="list-style-type: none"> • <u>Ensure that the various users respect each other's rights and the Down environment</u> <p><u>There are strong economic links between the training yards, training grounds and the maintenance of Epsom and Walton Downs. The loss of racehorse training yards within the Racehorse Training Zone is harmful to the ongoing viability of the racehorse training grounds, which could negatively impact on the economy, sporting heritage of the area, and long-term management of Epsom and Walton Downs. For this reason, policy DM8 seeks to ensure the ongoing availability of suitable racehorse training yards to sustain the long-term viability of the industry, with losses being resisted unless there is clear evidence that there is no realistic prospect of the use of the site as a racehorse training yard continuing or such a use becoming re-established in the future. Marketing periods of no less than 24 months will be required by a recognised agent specializing in the racing sector property market. Further details on marketing requirements are contained in Appendix 5.</u></p> <p>These sites and their associated training grounds, paddocks and fields are included within the Racehorse Training Zone defined on the Policies Map, within which any development proposals will be considered against, as well as all other relevant policies in the Local Plan.</p> <p>6.33. <u>It is recognised that the racehorse training industry requires specific supporting infrastructure to effectively function. This includes but is not limited to on-site/nearby staff accommodation, horse walks, gallops, paddocks and horse walkers. In the case of development or alterations to</u></p>	
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			<p>racehorse training yards, development should be designed in line with the British Horseracing Authority's requirements.</p> <p><i>3 new paragraphs inserted following para 6.33</i></p> <p><u>The occupation of any staff accommodation should be restricted by condition and/or legal agreement as appropriate, to solely be for staff to ensure the general day to day operations and management of the horseracing/racehorse training industry use.</u></p> <p><u>Access routes to and from the racehorse training yards and training grounds are identified on the Policies Map as Racehorse Movement Corridors. There is the potential for conflict between racehorses and other road users along parts of some routes. These are highlighted on the Policies Map. The Council will support schemes to improve the safety of these routes for horses, pedestrians and other road users.</u></p> <p>6.34. The loss of equestrian facilities within the Racehorse Training Zone is potentially harmful to the ongoing viability of the 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.</p> <p>6.35. Marketing periods of no less than 18 months will be required by a recognised agent specializing in the racing sector property market. Further details on marketing requirements are contained in Appendix 5.</p>	
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			<p><u>Policy DM8: Racehorse Training Industry Epsom Downs Racecourse and Racehorse Training Industry</u></p> <p><u>Racecourse Area</u></p> <p>1) Within the extent of the racecourse <u>area</u>, as <u>defined</u> identified on the Policies Map, development proposals to support the continued use of the site for horse racing purposes will be supported, subject to Green Belt considerations. <u>This may include suitable non-racing development to support the long-term viability of the racecourse.</u></p> <p><u>Racehorse Training Zone</u></p> <p>2) Within the Racehorse Training Zone, as defined <u>identified</u> on the Policies Map:</p> <p>a) Proposals which facilitate the long-term or future use of the site <u>for the racehorse training industry and/or as a racehorse training yard</u> racing stable <u>and/or for the racehorse training industry</u> will be supported, <u>subject to Green Belt considerations. This may include the development of new facilities, such as infrastructure to support the industry, and/or the expansion/reconfiguration of existing facilities.</u></p> <p>b) Any proposals resulting in the loss of specific facilities which would support the long term or future use of the site as a <u>racehorse training yard</u> racing stable will be resisted.</p>	
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			<p>c) The change of use or redevelopment of existing racehorse training yards for alternate uses not in connection with the horse racing / racehorse training industry will not be permitted unless evidence has been provided that:</p> <p>i) Marketing of the site for the horse racing sector has taken place for a period of at least 24⁴⁸ months, at a reasonable market value with a recognised agent specializing in the racing sector property market; and,</p> <p>ii) <u>There is the opportunity for the site to revert to a racehorse training yard or uses in connection with the racehorse training industry in the future or that such opportunities to enable this have been fully explored and exhausted.</u> Opportunities to reconfigure and reuse or redevelop the site so that it can revert to racehorse training that supports the racehorse training industry in the future have been exhausted</p> <p><u>Racehorse Movement Corridor</u></p> <p>3) Anyll proposals, regardless of the type of development, should demonstrate that it <u>they</u> will not adversely affect the <u>Racehorse Movement Corridor, as defined on the Policies Map, in terms of the safety of racehorses travelling between training yards and the training grounds and the racing stable yards</u> by virtue of the traffic generation from or the design of the development and provide mitigation where there is an impact.</p>	
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			<p><u>4) Proposals which would improve the safety of horses, pedestrians and other road users along these routes, particularly those where the potential for conflict has been identified (as defined on the Policies Map), will be supported.</u></p>	
MM73	99-100	Policy DM9	<p>6.38. New visitor accommodation will be supported in areas with good access to frequent and direct public transport and amenities in the borough such as identified town or local centres. This will focus development in parts of the borough where access to public transport can be optimised. <u>which are well served by public transport, this includes proximity to rail stations or frequent bus services.</u></p> <p>6.39. The occupation of new tourist accommodation will be restricted using conditions or legal agreements to ensure visitor accommodation is for tourist use and not permanent residential use.</p> <p>Policy DM9: Visitor Accommodation</p> <p>1) Planning permission will only be granted for the development of visitor accommodation in the following locations: 1) Epsom Town Centre, 2) Local Centres, on sites allocated for that purpose, and 3) in locations <u>which are well served by public transport where there is frequent and direct public transport to the town centre.</u> This locational requirement does not apply to proposals to refurbish or expand existing sites.</p> <p>2) Proposals for new, refurbished or expanded holiday and other short-stay accommodation must satisfy the following criteria:</p>	<p>Modified text to clarify the need for visitor accommodation to be located close to public transport for effectiveness and remove unnecessary text about the use of conditions</p> <p>Necessary for clarity and effectiveness to modify part 1 to clarify the locations where visitor accommodation will be granted</p>

			<p>a) they are acceptable in terms of access, parking, highway safety, traffic generation, pedestrian and cycle movements; and</p> <p>b) there is no <u>permanent</u> loss of residential dwellings; and</p> <p>c) the accommodation will not result in an unacceptable level of noise and disturbance to nearby residents.</p> <p>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:</p> <p>a) no other occupier can be found following a realistic effort to market the premises for a period of at least 12 months, for continued use as visitor accommodation (whether or not of the same form of the existing use); and</p> <p>b) evidence of non-viability is submitted.</p>	Added text to clarify that the policy applies to the permanent loss of residential to take into account short term/temporary forms of visitor accommodation
MM74	101-102	Policy S11	<p>S11 Design and Heritage</p> <p><u>7.1. High quality d</u>Design is essential to retaining the borough's distinct sense of place, as stipulated in the plan's vision and strategic objectives. In addition to As well as the appearance of how development "looks" and achieving "beauty", design is also a crucial to <u>health and well-being</u>, sustainable development, climate change, health and other factors which are important for the borough.</p>	Necessary changes made to align with national planning policy

			<p><i>Three new paragraphs to be inserted following para. 7.1</i></p> <p><u>The borough has a rich, varied and evolving history, which contributes significantly to its sense of place and identity. Our relationship with history is characterised in no small part by the built environment, particularly by its “heritage assets” (as defined by the national planning policy), which also make an important contribution to the quality of the borough’s townscape.</u></p> <p><u>The Town of Epsom and village of Ewell have evolved over time which has influenced their character and appearance, with historic cores containing listed buildings. Major periods of urban growth took place in the 1930s and 1950s. The predominant housing type constructed was low density semi-detached suburban housing. Development from the 1950’s onwards is more diverse with many areas of smaller infill, some modern developments in Epsom Town Centre and more recently the redevelopment of the hospital cluster sites. The character and appearance of development is therefore key to how development integrates into its surroundings.</u></p> <p>The Council is in a strong position to require good and efficient design from development. The viability assessment of the plan has been conducted in the context of market conditions which are very buoyant in this part of England. Therefore, proposals will be required to demonstrate high quality design.</p> <p>7.2. It is therefore very important that the borough encourages the highest standards of design in all new developments, and a design policy is considered a strong foundation on</p>	<p>Necessary additions for effectiveness as Policy S13 Heritage will be deleted and combined with this policy</p> <p>Deleted text as density standards moved to policy</p>
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			<p>which to do this. Of particular importance is the need for development to make efficient use of land, due to the rich variety of protected land use designations unique to the borough, which are under pressure due to high demand for development. The council considers “efficient use of land” to mean, for major development (as defined by the Town and Country Planning Act etc.) a minimum of:</p> <ul style="list-style-type: none"> • 80 dwellings per hectare in Epsom Town Centre (as defined on the Policies Map) • 60 Dwellings per hectare near public transport hubs beyond Epsom Town Centre, and • 40 dwellings per hectare in the remaining defined urban area as defined on the policies map other urban areas. <p>7.3. The council is in a strong position to require good and efficient design from development. The viability assessment of the plan has been conducted in the context of market conditions which are very buoyant in this part of England. Therefore, proposals will be required to demonstrate good design. This policy complements the National Design Guide and the National Planning Policy Framework, which provides further context and principles with regards to design expectations.</p> <p>7.4. This policy complements the National Design Guide and the National Planning Policy Framework, which provides further context and principles with regards to design expectations. It should also be recognised that “good design” is not only the domain of this policy, but complemented by others in this plan, and should not be treated as a policy to be traded-off against. To provide further assistance, the Council may provide further prescriptive guidance by producing its own</p>	<p>wording to ensure policy is positively prepared</p> <p>Necessary for effectiveness and to ensure that the supporting text aligns with national policy</p>
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			<p>design codes in the future, with which compliance will be expected. The Council will encourage developers to engage in the Design Panel Review process to help improve the design quality of new developments in the Borough. Design South East provides this service and it is recommended that the panel are appointed as early as possible in the scheme's development.</p> <p>S11 Design and Heritage</p> <p>1) The design of development The Council will require high quality and appropriate design from development of all scales (including extensions, alterations and conversions). <u>Proposals</u> should be appropriate in relation to the character, appearance and functioning of the built and natural environment by:</p> <p style="padding-left: 40px;">a) making efficient use of land; and a) <u>Optimising the potential of the site to accommodate an appropriate amount and mix of development</u></p> <p style="padding-left: 40px;">b) being of appropriate use, scale, mass, proportion, detailing, material, layout and siting; and</p> <p style="padding-left: 40px;">c) <u>enhancing (as far as possible) the borough's cultural, historic, architectural and townscape character, protecting the character of historic places and the significance of designated heritage assets; and</u></p> <p style="padding-left: 40px;">d) respecting the scale, appearance, <u>building lines</u> and location of buildings, spaces and visual amenity of the surrounding area; and</p>	
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			<p>e) <u>having a positive impact on public realm by enhancing the quality of the existing public realm and maximising opportunities to create new public realm where appropriate; and</u></p> <p>f) <u>creating a sense of place through provision of attractive soft landscaping and open space where appropriate; and</u></p> <p>g) <u>maximising opportunities for natural security through layout and design by incorporating secured by Design Standards; and</u></p> <p>h) <u>demonstrating how the scheme has been developed in accordance with the principles set out in the National Model Design Code and</u></p> <p>⌚ i) <u>maximising opportunities for integrating passive design principles, including orientation, glazing and shading.</u></p> <p>⌚ j) <u>where appropriate, providing well structured, practical and attractive areas of soft landscaping and open space.</u></p> <p>2) <u>All development should make efficient use of land, with major schemes that include residential uses expected to achieve the following minimum densities dependent upon their location:</u></p> <p>i. <u>Epsom Town Centre (as defined on the policies map) 80 dwellings per hectare</u></p> <p>ii. <u>Sites within 400m of a rail station and / or high frequency bus corridor (as defined in the glossary</u></p>	<p>Necessary modifications for greater clarity including in relation to efficient use of land, appropriate densities for different locations, reference to the design code. Changes made to the policy to ensure it is effective and consistent with national policy</p>
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			<p>beyond Epsom Town Centre 60 dwellings per hectare</p> <p>iii. The remaining urban area (as defined on the polices map) 40 dwellings per hectare</p> <p>3) <u>On a case-by-case basis, it may be appropriate for larger developments to be shaped by a design review panel process proportionate to their scale and significance</u></p> <p><u>Key supporting documents</u></p> <ul style="list-style-type: none"> • <u>National Model Design Code</u> 	Key supporting document added for consistency with other policies
MM75	103	Policy S12	<p>DM24 S12-Amenity Protection</p> <p>7.7 Overlooking from public rights of way, play areas and neighbouring properties should be taken into account in any development proposal. The layout and orientation of buildings should take advantage of sunlight and should not block daylight to habitable rooms, dominate or enclose neighbouring residencies. There is an expectation that residential developments will have a separation distance of at least 20m between elevations (rear to rear), unless it can be demonstrated that this would not harm residential amenity.</p> <p><u>DM24 S12-Amenity Protection</u></p> <p>All development should secure the amenities of its future occupants, and protect those amenities enjoyed by nearby and adjacent properties. The design of development, should have regard to:</p>	<p>Changed from strategic to non-strategic policy as the policy does not meet the relevant tests of the Framework</p> <p>Removed text as now moved to policy wording to ensure it is effective</p> <p>Moved reference to separation distances from supporting text to ensure the policy is effective</p> <p>Changes made to the policy to ensure it is positively prepared,</p>

			<p>a) <u>Have an acceptable impact on the living environment of occupiers of existing residential properties and / or provide adequate living conditions for future occupiers of residential properties; and</u></p> <p>b) <u>Mitigate privacy and overlooking through the provision of a minimum separation distance of 20m between residential properties unless it can be demonstrated that there would be no harm to residential amenity and / or it would prevent the efficient use of land in sustainable location; and</u></p> <p>c) a) <u>Limit the loss of privacy,</u> daylight, and sunlight; and</p> <p>d) b) <u>Mitigate the impacts of:</u></p> <p style="padding-left: 40px;">i) Noise, vibration, light, heat, smell and airborne emissions consisting of odour, fumes, smoke, soot, ash, dust and grit, and artificial light, and</p> <p style="padding-left: 40px;">e)ii) activity levels and tTraffic movements to, from generation; and within the site</p> <p>d) security of property and personal safety.</p> <p><u>Key supporting documents</u></p> <ul style="list-style-type: none"> • <u>National Model Design Code</u> • <u>Building Research Establishment - A Good Practice Guide for site layout planning for daylight and sunlight.</u> 	<p>effective and consistent with national policy</p> <p>Added key supporting documents added for effectiveness</p>
MM76	104-105	Policy DM10	<p><u>Policy DM10 – Building Emissions and Energy Standards</u></p> <p><u>Policy DM10: Building Emissions and Energy Standards</u></p>	<p>Title and policy name change- Amendment necessary to ensure policy is effective</p>

			<ol style="list-style-type: none"> 1) All proposals should embed the Energy Hierarchy within the design of buildings by prioritising fabric first, orientation and landscaping in order to minimise energy demand for heating, lighting and cooling. 2) All proposals should consider opportunities to provide solar PV and energy storage. 3) Residential development will be required to achieve Net Zero Carbon, demonstrated through the submission of an appropriate energy assessment that demonstrates how the proposal will achieve: <ol style="list-style-type: none"> a) Space heating demand less than 30kWh/m2/annum b) Total energy use less than 40kWh/m2/annum; and c) On-site renewable energy generation to match the total energy use, with a preference for roof mounted solar PV. 4) Where the use of on-site renewables to match total energy consumption is demonstrated to be not technically feasible (for example with taller flatted buildings) or economically viable, renewable energy generation should be maximised as much as possible; and/or connection to an existing or proposed district energy network. 5) 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 energy efficiency 	
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			of the proposed buildings, and/or the provision of on-site renewable and low-carbon technologies.	
MM77	106	Policy DM11	<p>7.17. The policy requires that new dwellings, <u>as a minimum</u>, meet the tighter Building Regulations optional water efficiency requirement of 110 litres per person per day <u>or any increased standard that may be introduced in the future</u>, this is a continuation of current previous policy in the borough. <u>Planning conditions maybe used on planning approvals for new dwellings to ensure the optional requirement is applied and that this is calculated using the 'fittings based approach'.</u></p> <p><u>Key supporting documents</u></p> <ul style="list-style-type: none"> • <u>Approved Document G: sanitation, hot water safety and water efficiency</u> 	<p>Necessary modifications supporting text to ensure policy is effective</p> <p>Modified to include Key document - consistent with other policies</p>
MM78	107	Policy DM12	<p><u>Key supporting documents</u></p> <ul style="list-style-type: none"> • <u>The Surrey Health and Well-Being Strategy</u> • <u>Surrey Health Impact Assessment Guidance Statement</u> • <u>Joint Strategic Needs Assessment (JSNA) contains a wealth of health data.</u> 	Modified to include Key document - consistent with other policies
MM79	108	Policy S13	<p><u>Policy S13 – Preserving identity of place with heritage</u></p> <p>7.23. The borough has a rich, varied and evolving history, which contributes significantly to its sense of place and identity. Our relationship with history is characterised in no small part by the built environment, particularly by “heritage assets” (as defined by the national planning policy), which</p>	Policy deleted as matters adequately addressed by policy S11

			<p>also make an essential contribution to the quality of the borough's townscape.</p> <p>7.24. Importantly, these heritage assets provide context for development, and can collectively act as a useful compass to guide decision making. It is therefore vital that tangible and cultural heritage assets and their settings are either protected or enhanced, or where necessary, adapted in a sensitive way.</p> <p>Policy S13: Preserving identity of place with heritage</p> <p>1) Development will be permitted where as far as possible, it enhances the borough's cultural, historic, architectural and townscape character.</p> <p>2) The Council will seek to utilise mechanisms available through national policy and legislation, to protect the character of historic places and the significance of designated heritage assets, and uphold the principles upon which such protection has been justified.</p> <p>Key supporting documents-</p> <ul style="list-style-type: none"> • National Heritage List for England- • Locally Listed Heritage Assets- • Conservation Area Appraisals- • Historic England Advice Notes- • Local Plan Heritage Topic Paper • Appendix 6 – Guidance on Proposals Impacting Heritage Assets- 	
MM80	110	Policy DM13	<p>7.35. The level of detail required to demonstrate the impact of a development on any heritage asset shall be at the <u>in line with the NPPF</u> discretion of the Council, taking into</p>	Necessary for effectiveness and to ensure the policy is positively prepared

			consideration National Policy and Guidance and the Council's own planning application validation requirements. For further information see Appendix 65, guidance on proposals impacting Heritage Assets.	
MM81	111	Policy DM14	<p>Policy DM14: Shopfronts</p> <ol style="list-style-type: none"> 1) The design of new shopfronts and other commercial signage and the re-design of existing shopfronts and commercial signage should demonstrate: <ol style="list-style-type: none"> a) respect for the architecture and features of the buildings in or on which they are set and the character of the area; b) public safety would not be prejudiced; c) visual pollution and clutter are avoided; d) the proposal will provide an 'active street front'. 2) Shopfront Design should accord with the Council's guidance for shopfronts: 'Shopfront Design Guide' or any future revisions to this document. 3) The Council will resist the removal of shopfronts of architectural or historic interest. 4) The Council will control 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). 	Deleted reference to future revisions to this document as policy wording not effective
MM82	112	Policy DM15	Policy DM15 – Green Belt	Modified policy and supporting text to provide clarity in relation to extensions and

			<p>7.39. Approximately 40% of Epsom and Ewell is Green Belt, land designated under a national policy designed to restrict the urban sprawl from London. The Green Belt serves five purposes:-</p> <ul style="list-style-type: none"> • to check the unrestricted sprawl of large built-up areas;- • to prevent neighbouring towns merging into one another;- • to assist in safeguarding the countryside from encroachment;- • to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land;- <p><u>Green Belt policy can be found in the National Planning Policy Framework. Policy DM15 is not intended to repeat national policy, but to provide local detail on specific policy matters.</u></p> <p><i>Two new paragraphs inserted after para. 7.39.</i></p> <p><u>The Green Belt is very important to Epsom & Ewell as it:</u></p> <ul style="list-style-type: none"> • <u>positively contributes to the boroughs identity, character and appearance;</u> • <u>prevents coalescence with other settlements to the west, east and south;</u> • <u>contains public open spaces such as Horton Country Park, Epsom Common and the Epsom Downs, parts of which are protected by national and local environmental designations,</u> • <u>provides land for sport, including sports pitches which play a valuable role in health and wellbeing contains</u> 	<p>major developed sites in the Green Belt necessary for effectiveness and consistency with national policy, and to ensure that the supporting text does not contain policy requirements</p>
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			<p>the Epsom Downs Racecourse, racehorse training industry and infrastructure,</p> <p><u>Proposals within the Green Belt will be expected to comply with all other Local Plan policies when taken as a whole, particularly those that cover design, amenity, landscape, biodiversity and flooding.</u></p> <p>7.40. National policy defines what is inappropriate and what exceptions to this definition exist, and should be read in conjunction with this policy. It also defines what is not inappropriate development. This policy aligns with the NPPF definitions and exceptions but adds the following detailed definitions to them:-</p> <p>Extensions or alterations</p> <p>The “original building” shall mean either:- the building as it existed on 1 July 1948; or if no building existed on 1 July 1948, then the first building as it was originally built after this date:-</p> <p>Replacement buildings</p> <p>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.-</p> <p><u>In terms of extensions or alterations to an existing dwelling or other building within the Green Belt, this will be considered against the original building, which is the size of the building that existed on 1 July 1948 or the building as first built if later than this</u></p>	
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			<p>date. This is to enable the effect of cumulative development to be taken into account when a building has been extended previously. The cumulative impact of a series of small extensions can be just as great as a single large addition. The size of the plot is not relevant when considering whether a replacement building is materially larger or an extension results in disproportionate additions.</p> <p>Policy DM15: Green Belt</p> <p>Green Belt</p> <p>1) Development in the Green Belt will be considered inappropriate, and will not be permitted unless:</p> <p style="padding-left: 40px;">a) the development itself is an exception to the definition of “inappropriate” as defined by the National Planning Policy Framework; or</p> <p style="padding-left: 40px;">b) there are very special circumstances to justify the inappropriate development.</p> <p>2) Very special circumstances are circumstances where other considerations clearly outweigh the harm to the Green Belt as a result of the development.</p> <p>1) <u>The Green Belt boundary is defined on the Policies Map. In order to uphold the fundamental aims of the Green Belt, inappropriate development should not be approved except in very special circumstances. 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.</u></p> <p>Replacement and Extension of Buildings in the Green Belt</p>	
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			<p><u>2) The Council will permit the replacement of a building in the Green Belt provided the new building:</u></p> <ul style="list-style-type: none"> <u>a) would be in the same use; and</u> <u>b) is not materially larger than the one it replaces; and</u> <u>c) is sited on or close to the position of the existing building, unless an alternative position would benefit the openness of the Green Belt; and</u> <u>d) does not have a materially greater impact on the openness of the Green Belt.</u> <p><u>3) The Council will permit the extension and alteration to a building in the Green Belt provided the additional development:</u></p> <ul style="list-style-type: none"> <u>a) is not disproportionate, over and above the size of the original building; and</u> <u>b) does not have a materially greater impact on the openness of the Green Belt.</u> <p><u>Infill or redevelopment of previously developed land in the Green Belt</u></p> <p><u>4) The Council will permit limited infilling of previously development land in the Green Belt provided the development:</u></p> <ul style="list-style-type: none"> <u>a) does not have a materially greater impact on the openness of the Green Belt; or</u> <u>b) does not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute</u> 	
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			to meeting an identified affordable housing need within the area of the local planning authority.	
MM83	115	Policy S14	<p><i>New paragraph after para. 7.49.</i></p> <p><u>The Council holds a licence granted by Natural England under the Great Crested Newt District Licencing Scheme. This is to ensure appropriate monitoring and mitigation takes place with regard to the habitats of great crested newts and assessment of impacts from proposed development.</u></p> <p>7.50. The council recognises the opportunities to encourage biodiversity that can be provided through the development of sites. These include providing, retaining and enhancing wildlife and river corridors and incorporating opportunities within construction methods, such as green roofs, and the provision of suitable appropriate native species in landscaping.</p> <p>Policy S14: Biodiversity and Geodiversity</p> <p>1) Development proposals will be permitted where they do not have an adverse impact on biodiversity, or geodiversity. Where harm or loss cannot be avoided, mitigation will be required such that it can robustly demonstrate that:</p> <ul style="list-style-type: none"> 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; 	<p>Additional text necessary to ensure the policy is effective</p> <p>Clarification the contribution made by blue infrastructure to ensure the policy is effective</p> <p>Necessary modification part e to be positively prepared</p> <p>Amendment to clarify the importance of mitigation necessary for the policy to be positively prepared</p>

			<p>c) there will be no loss or deterioration of a priority habitat type, and/or irreplaceable habitat;</p> <p>d) the mitigation measures make a specific and positive contribution towards conservation objectives of Biodiversity Opportunity Areas or area identified as a priority for nature recovery in the emerging Local Nature Recovery Strategy LNRS (if located within such area); and</p> <p>e) there will be no adverse effect on the integrity of linkages between designated sites and priority habitats <u>are maintained or enhanced.</u></p> <p>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, it must be robustly demonstrated that the benefits of the development proposal clearly outweigh the loss or harm and that appropriate <u>mitigation and/or</u> compensation will be sought.</p> <p>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.</p> <p>Key supporting documents</p> <ul style="list-style-type: none"> • Epsom and Ewell Biodiversity Action Plan (2020-2030) • Emerging Local Nature Recovery Strategy • <u>Water Framework Directive</u> 	<p>Additional supporting document for consistency and to ensure policy is positively prepared</p>
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MM84	117-118	Policy S15	<p>Policy S15 DM25 – Biodiversity Net Gain</p> <p>7.53. This policy will require at least 10% BNG on qualifying development proposals and 20% BNG from <u>seven</u> greenfield site allocations SA33 -SA35 and SA48 -51 where the. This higher requirement is detailed in the site allocation policy.</p> <p>7.56. To implement the general biodiversity gain condition, a Biodiversity Gain Plan demonstrating a biodiversity net gain of at least 10% (or the higher 20% requirement for specific site allocations <u>or on unallocated sites that lie outside the urban area as defined on the policies map</u>) must be approved before development commences on a site. BNG will be provided either on-site, off site or through statutory biodiversity credits in line with the BNG hierarchy.</p> <p>7.57 Biodiversity net gain will be secured by planning condition, legal agreement or a conservation covenant, for a period of at least 30 years after the completion of the development</p> <p>Policy S15DM25: Biodiversity Net Gain</p> <p>1) Planning applications, other than those that are exempt in accordance with the regulations, will be permitted provided that the council is satisfied it can be demonstrated that at least 10% biodiversity net gain can <u>be achieved</u> (unless a higher requirement has been specified in a site allocation policy <u>or on unallocated sites that lie outside the urban area as defined on the Policies Map</u>).</p>	<p>Modified the policy from strategic policy to development management policy</p> <p>Changes are necessary for clarity and effectiveness and to remove unnecessary duplication.</p> <p>Modified for effectiveness the site allocations outside the urban area require 20% BNG</p> <p>Remove supporting text as not justified</p> <p>Necessary for clarity and effectiveness Modified text to accord with national policy</p> <p>Criteria b and c modified for clarity</p>
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			<p>2) Biodiversity net gain should be delivered using the following hierarchy (<u>note this does not apply to irreplaceable habitats</u>):</p> <p>a) On-site as part of the development which have a <u>medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity metric), the avoidance of adverse effects from development and, if they cannot be avoided, the mitigation of those effects; and</u></p> <p>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 then, in relation to all onsite habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits;</p> <p>c) As a last resort, if it can be demonstrated that neither of these options are either available or economically feasible, net gain should be secured on land within the borough boundary. BNG offsets should align with and deliver the LNRS and preferably within BOAs.</p> <p>3) Biodiversity net gain will be secured by planning condition, legal agreement or a conservation covenant, as appropriate.</p>	
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			<p>Key supporting documents</p> <ul style="list-style-type: none"> Surrey Nature Partnership, Recommendation for adoption of 20% minimum BNG biodiversity net gain across Surrey's planning sector: a Surrey Nature Partnership Position Statement (2020) Statutory biodiversity Metric tools and guides: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides Small sites metric: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides Guidance – Buy Statutory biodiversity credits https://www.gov.uk/guidance/buy-statutory-biodiversity-credits Planning Practice Guidance Biodiversity Net Gain 	Supporting documents added/removed for consistency and to ensure policy is positively prepared
MM85	119-120	DM17	<p>Policy DM17: Trees, Woodlands and Hedgerows</p> <p>Development proposals will be permitted where:</p> <ol style="list-style-type: none"> they do not result in the loss of, or damage to, trees, woodlands and hedgerows that make a significant contribution to the character or amenities of an area, unless the benefits would clearly outweigh the loss and equivalent replacement planting is provided. they do not result in the loss of or damage to ancient woodland, ancient or veteran trees or trees protected by Tree Preservation Order (TPO) unless there are exceptional reasons circumstances and a suitable compensation strategy appropriate planting to mitigate the loss in biodiversity and natural asset is proposed 	<p>Modified for clarity and effectiveness to signpost to relevant technical standards Additional text about buffer zones to ensure consistency with national policy Modified part b to include 'and maintained' to increase emphasis on preservation and maintenance</p> <p>Modification to reflect national policy and Standing Advice</p>

			<p>and maintained. Where development is proposed adjacent to ancient woodland, suitable buffer zones of a minimum 15m must be provided (in line with Natural England's Standing Advice).</p> <p>c) they make provision for <u>new streets to be tree lined and new street trees</u> and trees within public open space (subject to site suitability) with sufficient space provided for the trees to grow to maturity, both above and below ground.</p>	from Natural England regarding buffers to ensure root protection
MM86	121-123	Policy S16	<p>7.66. Whilst the thresholds for flood zones and how different types of development should be approached are defined at a national level, the council has discretion as to the interpretation of "flood zone 3b". It has taken a precautionary approach and set a high bar by defining flood zone 3b as areas with a 1 in 3020 year fluvial flood risk or greater (>3.35 % Annual Exceedance Probability (AEP), which is also as consistent as possible with most other Local Planning Authorities in Surrey.</p> <p>7.67. Areas susceptible to Surface Water Flooding (SFW) are identified within the SFRA and not included within the flood zone thresholds, but will trigger the need for a site specific Flood Risk Assessment (FRA). It should be noted that areas of Surface Water Flooding are defined with the Surface Water Management Plan (2011) as identifies "Critical Drainage Areas" (CDAs). These are not the same as the national designations of the same name defined by the Environment Agency, and should not be conflated.</p> <p>7.68. In recognition of the heightened challenge faced by flooding, the Council has also heeded EA advice that development should be located 8m away from river banks.</p>	Necessary modification to correct the number of years from 20 to 30 year fluvial flood risk for effectiveness

			<p>However, requirements under Biodiversity Net Gain Requirements may necessitate further set-backs and should be considered in parallel to this policy requirement.</p> <p>7.70. The Level 2 assessment also provides further bespoke guidance for each allocated site as to whether further a site specific Flood Risk Assessment (FRA) will be required on application as well information about the FRA should be conducted.</p> <p><i>Insert new paragraph after paragraph 7.70</i></p> <p><u>Sustainable drainage systems (SuDS) manage surface water in a way that mimics natural processes, providing a wide range of benefits beyond traditional drainage methods. SuDS should be incorporated into development in accordance with the National Standards for Sustainable Drainage Systems.</u></p> <p>Policy S16: Flood Risk and Sustainable Drainage</p> <p>Development will be permitted where:</p> <ul style="list-style-type: none"> a) It demonstrates compliance with guidance set out in the Epsom and Ewell Borough Council Strategic Flood Risk Assessment 2024 (SFRA) and associated central Government policy and Guidance. b) Where necessary (as defined by Government Policy and Guidance), Sequential and subsequent exception tests have been passed <u>in line with national policy and guidance.</u> 	<p>Necessary to ensure consistency with national policy</p> <p>Necessary modification on SuDs to align with national policy</p>
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			<p>c) In the case of proposals in flood zone 2, 3a, 3b, sites greater than 1ha in flood zone 1, with an otherwise identified flood risk, or areas susceptible to Surface Water Flooding (as identified in the SFRA maps), Planning application(s) have been accompanied by a Flood Risk Assessment in line with national policy and guidance.</p> <p>d) It is set back a minimum of 8 metres from riverbanks and/or existing flood defence infrastructure (measured from the top of the riverbank at the point at which the bank meets the level of surrounding land).</p> <p>e) Finished floor levels are set 300mm above the climate change flood level (as defined in the SFRA).</p> <p>f) It would not increase the risk of flooding to the site or elsewhere its neighbours or m. Mitigation measures to alleviate address (such as Sustainable Drainage Systems, Nature Based solutions or Natural Flood Management) will be implemented. such risks should be in line with guidance from both the Lead Local Flood Authority and Environment Agency depending on the source of flood risk.</p> <p>g) Any increase in built footprint within the fluvial Flood Zone 3a (inclusive of the climate change flood extent) is compensated for from a flood storage perspective on a level for level, volume for volume basis.</p> <p>h) It does not result in the culverting of main rivers.</p>	Necessary modifications to align with national policy
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			<p>i) It will result in the de-culverting of main river channels where applicable, subject to demonstrating that flood risk will not be increased elsewhere.</p> <p>j) <u>Sustainable drainage systems are installed which follow the drainage hierarchy of:</u></p> <ul style="list-style-type: none"> <u>i. storing rainwater for later re-use;</u> <u>ii. use infiltration techniques;</u> <u>iii. attenuate rainwater in ponds or open water features for later gradual release;</u> <u>iv. discharge rainwater directly to a watercourse;</u> <u>v. discharge rainwater to a land drain, highway drain or surface water sewer;</u> <u>vi. discharge rainwater to a combined sewer.</u> <p><u>Development should avoid the use of underground tanks and conveyance, except when all other reasonable alternatives to provide a sustainable drainage solution have been exhausted, any discharge of surface water to a watercourse or sewer system is not to exceed pre-development (greenfield) runoff rates or a maximum of 2/l/s/ha whichever is lower</u></p> <p>Key supporting documents</p> <ul style="list-style-type: none"> • Strategic Flood Risk Assessment – Level 1 2024 • Surface Water Management Plan 2011- • Epsom and Ewell Climate Change Action Plan 2020. • Flood Risk Regulations 2009- • Flood Water Management Act 2010- 	
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			<ul style="list-style-type: none"> • National and Coastal Erosion Risk Management Strategy 2020- • EA FCERM Roadmap to 2026- • UK Environment Act 2021- • UK Climate Change Adaptation Policy 2021- • UK Climate Risk Assessment 2022- • Surrey County Council Preliminary Flood Risk Assessment 2011- • Surrey Local Flood Risk Management Strategy 2017 • Planning Practice Guidance – Flood Risk and Coastal Change 2022- • <u>National standards for sustainable drainage systems (SuDS) 2025</u> • National Planning Policy Framework- • Thames Catchment Flood Management Plan 2009- • Thames River Basin District Flood Risk Management Plan 2022- • Surrey County Council Sustainable Drainage System Design Guidance- 	
MM87	126-127	Policy S17	<p>8.4. New or improved infrastructure must be 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 to ensure this can be achieved. For new development, the provision of or funding towards new infrastructure will be secured through planning obligations (S106) and/or the Community Infrastructure Levy (CIL). <u>Phasing conditions could be used where necessary to align the occupation of development with delivery of off-site infrastructure upgrades.</u></p>	<p>Modified for clarity and effectiveness to be clear that the policy applies to certain development and that funding needs to be secured and therefore should be set out.</p> <p>Delete wording regarding funding which needs to be within the policy itself to be effective</p> <p>Modified to clarify that infrastructure provision could</p>

			<p>8.5. 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. <u>The loss of open space, social infrastructure and other community facilities as defined in the glossary, are considered under policies DM19 and DM20. Developers must provide evidence to this effect that consultation with an appropriate range of service providers and the community has taken place.</u></p> <p>8.7. The delivery of infrastructure will be funded through a combination of mechanisms, which will include the use of Community Infrastructure Levy (CIL) 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.</p> <p>Policy S17: Infrastructure Delivery</p> <p>1) <u>Development proposals, including those allocated within this plan which give rise to a need for infrastructure requirements, will be expected to mitigate their impact, whether individually or cumulatively. Where additional infrastructure capacity is required, this will be either At 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 through off-site contributions. Such provision will be secured by legal agreements or via the Community</u></p>	<p>be phased for large development and aligned with infrastructure upgrades to ensure the policy is justified.</p> <p>Additional clarification in relation to loss of specific infrastructure</p> <p>Delete last sentence from 8.5 for clarity to ensure an effective policy</p> <p>Changes are necessary for clarity and effectiveness and to remove unnecessary duplication.</p> <p>Text modified to clarify that the policy applies to certain types of development and that</p>
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			<p>Infrastructure Levy. through financial contributions via the infrastructure levy.</p> <p>2) Infrastructure must be provided at the appropriate time, prior to the development becoming occupied or becoming operational. <u>For larger developments, infrastructure may need to be phased and appropriate delivery of infrastructure should be agreed on a site by site basis. to ensure that this requirement can be met.</u></p> <p>3) Development of new infrastructure, in particular infrastructure projects identified in the Infrastructure Delivery Plan, that meet needs of the borough and its communities will be permitted, subject to the consideration of other policies within this Local Plan.</p> <p>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.</p>	<p>funding needs to be secured and what mechanisms will be used to secure it</p> <p>Additional clarification in relation to loss of specific infrastructure</p>
MM88	128	Policy S18	<p>8.8. Green and blue infrastructure includes individual natural components that are connected into network fulfilling multi-functional roles with multiple benefits to the local community, economy and environment. Green features may include (but are not limited to) open space, parks, public and private gardens, woodlands, playing fields, allotments, trees, green roofs/walls and blue features may include rivers, streams, <u>footpaths and shared surfaces</u>, green and sustainable drainage systems.</p> <p>8.9. An integrated green and blue infrastructure network can encourage inward investment, help to improve mental and</p>	

			<p>physical health and wellbeing, enhance biodiversity, and assist with climate change mitigation and adaptation.</p> <p><i>2 new paragraphs in-between para. 8.9 & 8.10:</i></p> <p><u>All development should contribute towards the provision, improvement, and maintenance of the green infrastructure network across the Borough where appropriate to do so. Whilst the Council will only expect ‘major’ development proposals to be designed in accordance with established, recognised green infrastructure standards, all developments can make a positive impact on the green infrastructure network and proposals will, be expected to make such provision at a scale that is commensurate with the development.</u></p> <p><u>Expanding and enhancing the green and blue infrastructure network will provide multiple benefits to the Borough as a whole, however, preserving its quality and condition for the long term requires effective management arrangements to be in place from the outset to ensure a successful and sustainable outcome is achieved. The most appropriate management option for a development will vary depending on the scale, location and green and blue infrastructure provided and must be agreed on a case-by-case basis.</u></p> <p>Policy S18: Green and Blue Infrastructure</p> <p>4. Development will be supported provided that:</p> <p>a) it protects and enhances the integrity, quality, connectivity and multi-functionality of the existing green</p>	<p>Text modified to clarify that future management arrangements should be secured to ensure the policy is effective</p>
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			<p>and blue infrastructure network and individual sites and components of the network;</p> <p>b) it <u>protects and enhances the green and blue infrastructure network</u>, through provision of appropriate green or blue infrastructure features <u>within the network</u>; <u>Major developments must demonstrate that provision is in accordance with established, recognisable standards, including the National Model Design Code and the Natural England Green Infrastructure Framework.</u></p> <p>c) any <u>loss or</u> adverse impacts on the green <u>and blue</u> infrastructure network are fully mitigated through the <u>replacement</u> / provision of green infrastructure <u>of equivalent or better value</u> on-site or, where feasible, through appropriate off-site compensatory measures; and</p> <p>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.</p> <p>2) Development proposals that would result in the loss or harm of green and blue 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</p> <p><u>Key Supporting Documents</u></p> <ul style="list-style-type: none"> • <u>National Model Design Code</u> • <u>Natural England Green Infrastructure Framework</u> • Surrey County Council Green and blue Infrastructure: best practice case studies 	<p>Modified for effectiveness with additional text to clarify and emphasise the connectivity to the wider network beyond the site</p> <p>Modification to c) to make clear that loss should be replaced</p> <p>Modified for effectiveness for relevant supporting documents added including Natural England's GI Framework</p> <p>Relevant supporting documents added for consistency and to ensure the policy is positively prepared</p>
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			<ul style="list-style-type: none"> <u>Natural England Green Infrastructure Framework</u> 	
MM89	129-131	Policy DM19	<p>Policy DM19 – Open Spaces, <u>Outdoor Sport and Recreation</u></p> <p>8.11. This policy covers formal and informal open spaces, outdoor and indoor sports <u>land/facilities and ancillary buildings/recreational facilities</u>, allotments and equipped areas of play.</p> <p>8.12. Open spaces often have a multi-functional role, providing a range of leisure and recreational opportunities, making a valuable contribution to health and wellbeing, being havens for biodiversity, 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 SUDS.</p> <p>8.13. The council's evidence base studies have found that generally there is a good range of accessible public open spaces, sports facilities and playing pitches within the borough. These are greatly valued by residents and attract many users from beyond the borough's boundaries. The studies have also found that there is a need for new/improved public open space provision in certain areas of the borough and there is demand for additional sporting facilities.</p> <p>8.14. The purpose of this policy is to ensure that the range and quality of open spaces, <u>outdoor</u> sport and recreation provision is maintained and improved where needs are identified, to ensure it meets the needs of the communities they serve. <u>Opportunities to achieve wider community use of facilities for outdoor sport and</u></p>	<p>Modified to clarify that the policy applies to outdoor sports and moved reference to indoor facilities to DM20 to ensure consistency with national policy</p> <p>Other modifications for clarity and effectiveness</p>

			<p><u>recreation, for example on educational sites, will be sought through the utilisation of measures such as Community Use Agreements (CUA).</u></p> <p>8.15. Existing open spaces, sport and recreational buildings and land, including playing fields, will be safeguarded in accordance with national policy. The general expectation <u>is that such land should not be built on unless it is clearly shown to be surplus to requirements, or proposals will provide an equivalent or better provision in a suitable location, or the proposal is for alternative sports and recreational provision the benefits of which clearly outweigh the loss of the former use. will be that proposals affecting this type of existing infrastructure will include provision for equivalent or better-quality provision.</u> Open spaces designated as Local Green Space (as defined on the Policies Map) have the greatest protection and will be afforded the same level of protection consistent with areas within the Green Belt.</p> <p>8.16. <u>Where appropriate, A</u>all new development is expected to contribute towards the provision/<u>maintenance (and where appropriate, maintenance)</u> of infrastructure, which includes open spaces, sports and recreational facilities.</p> <p>Policy DM19: Open Spaces, Outdoor Sport and Recreation</p> <p>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.</p> <p>2) Proposals for new and improved, refurbished, replacement or extended <u>outdoor sports/facilities</u>indoor and <u>ancillary</u></p>	<p>Modified to clarify that the policy applies to outdoor sports</p>
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			<p>buildings built sport and recreational facilities must be of high quality, and optimise accessibility to all users <u>and where appropriate, maximise wider community benefit through the utilisation of measures such as community use agreements.</u></p> <p>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 community 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 <u>this provision</u> in perpetuity.</p> <p>4) Provision standards should be <u>Development proposals that would result in a net increase in the number of residential units are required to provide open space</u> in accordance with the Fields in Trust benchmark standard (or any future equivalent standard). However, the council will negotiate on a site-by-site basis the type of open space provision where other typologies may be more appropriate or desirable. having regard to the most up to date Open Space Audit:-</p> <p>5) Proposals which result in a loss of open space and/or <u>outdoor</u> sport and recreational buildings/land will only be considered where supported by robust evidence and will be assessed in line with national policy.</p> <p>6) Areas designated as Local Green Space (as defined on the Policies Map) will be safeguarded from development other than in very special circumstances where the potential harm to the Local Green Space and the purposes of including land</p>	<p>For conciseness, substituted open space with provision in criteria 3, removed reference to audit in criteria 3 in order to future proof the policy.</p> <p>Changes made to ensure the policy is consistent with national policy and effective</p>
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			<p>within it is clearly outweighed by other considerations. Any proposed improvements or enhancements which involve development will be assessed in accordance with national policy on proposals affecting the Green Belt.</p> <p><u>Key Supporting Documents</u></p> <ul style="list-style-type: none"> • Open Space Audit (2024) • Playing Pitch Strategy (2021) • Sports Facilities Assessment (2020) • <u>Epsom and Ewell Infrastructure Delivery Plan</u> 	Title for supporting documents amended and additional document added for consistency
MM90	132-133	Policy DM20	<p><u>Policy DM20 – Social Infrastructure and Community and Cultural Facilities</u></p> <p><u>8.20. Social infrastructure and Community and cultural facilities</u> play a vital role in supporting social well-being in the borough and it is therefore important that there are sufficient facilities to meet the needs of communities both now and in the future. <u>Social infrastructure and community facilities include uses such as healthcare facilities, education facilities, childcare facilities, leisure centres/sports halls, community centres/halls, libraries, public houses, the voluntary sector, public service providers, places of worship and cultural buildings such as theatres and arts centres. Community and cultural facilities include uses such as community halls, theatres, places of worship, cultural buildings, schools, education facilities, GPs or health centres, dentists, libraries, civic centres, open space, sports venue indoor and outdoor sports facilities, and public houses.</u></p> <p><i>New paragraph in-between para. 8.21 and 8.22</i></p>	<p>Modified title for clarity and effectiveness</p> <p>Modified first paragraph to define what uses would be included under Social Infrastructure and Community facilities- this has also been reflected in the glossary Incorporated former parts of DM19- Indoor sports/leisure facilities into this policy</p>

			<p><u>It is important to maximise the use of existing facilities given the limited land availability for new facilities. Proposals to enhance, upgrade and intensify the use of existing facilities will be supported, subject to the consideration of other policies within in this plan. The council will support proposals for facilities or “hubs” that accommodate a mix of community uses to enable the most efficient use spaces/facilities</u></p> <p>8.22. New provision should be located in sustainable locations, ensuring good accessibility by a wide range of travel modes. <u>Buildings and facilities should be flexible and adaptable. Where appropriate Community Use Agreements (CUA) will be sought to achieve wider community use of facilities.</u></p> <p>8.23. The council will require any loss to be fully justified, with marketing undertaken in accordance with the requirements of Appendix 5-, <u>unless the loss can be re-provided to an equivalent standard elsewhere within the borough or provision can be delivered in a different way, such as through estate rationalisation to deliver improved/modernised facilities. -</u></p> <p>Policy DM20: <u>Social Infrastructure and Community and Cultural Facilities</u></p> <p>1) Planning permission will be permitted for new or extensions/<u>enhancements</u> to existing community and cultural facilities provided that:</p> <p>a) there is a demonstrable identified need;</p>	<p>Modified text for effectiveness to promote reuse and maximising use of existing facilities.</p> <p>Additional text to promote community use agreements for wider community use to ensure policy is effective in this regard</p> <p>Modified text for clarity and effectiveness</p> <p>Social Infrastructure and Community facilities have been defined in the glossary</p>
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			<p>b) it is in a location that is well served by public transport and accessible by walking and cycling; and</p> <p>c) it is delivered in flexible and adaptable building/s which could accommodate other social infrastructure/<u>community</u> uses where practicable, to encourage efficient use of land through mixed use and increased public access; <u>and</u></p> <p>d) <u>where possible, It seeks to maximise wider community benefit through the utilisation of measures such as community use agreements.</u></p> <p>2) The council will only support the loss of existing community and cultural facilities where:</p> <p>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; and</p> <p>b) it has been vacant and actively marketed for a community use without success for at least 18 months; or</p> <p>c) it can be re-provided to an equivalent standard elsewhere within the borough or provision can be delivered in a different way.</p> <p>Key supporting documents</p> <ul style="list-style-type: none"> • Epsom and Ewell Infrastructure Delivery Plan • <u>Sports Facilities Assessment (2020)</u> 	<p>Additional text to promote community use agreements for wider community use</p> <p>Added Sports Facilities Assessment under key supporting documents</p> <p>Changes made to ensure policy is positively prepared and effective</p>
MM91	133	Policy DM21	Policy DM21 – Education Infrastructure	Deleted

		<p>8.25. For its size, the borough contains a wide range of education infrastructure ranging from early years providers, primary and secondary schools in both the public and private sectors to further and higher education facilities.</p> <p>8.26. It is home to three further and higher education campuses, notably the University for the Creative Arts, North East Surrey College of Technology (NESCOT) and Laine Theatre Arts, in addition to 6th form facilities at schools that play a valuable role in supporting the social fabric and economic success of the borough and its residents.</p> <p>8.27. 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.</p> <p>8.28. The council will support investment in the existing educational infrastructure to ensure facilities continue to support changing needs and demands.</p> <p>8.29. 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.</p> <p>Policy DM21: Education Infrastructure</p>	<p>Policy not necessary as covered by policy DM20, remove to avoid duplication.</p>
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			<p>1) Development proposals for the intensification and enhancement of established education facilities in the borough will be supported.</p> <p>2) Proposals which maximise the extended or multiple use of educational facilities for community or recreational use will be supported.</p> <p>Key supporting documents –</p> <ul style="list-style-type: none"> • Epsom and Ewell Infrastructure Delivery Plan 			
MM92	136	Policy DM22	<p>8.38. Aerodrome safeguarding is a legal requirement to ensure the safe operation of aerodromes, such as Heathrow, and Gatwick Airport and <u>Kenley Aerodrome</u>, is taken into account in the design of development. Aerodrome safeguarding considerations cover a number of aspects including tall structures, wind turbines and green infrastructure.</p> <p>8.40. The aerodrome safeguarding area extends to cover a zone broadly within 5530km of the airports, covering much of the borough. The borough is also within the 30km wind turbine notification area. More information is available on the airports website, and applicants are encouraged to consult the technical aerodrome safeguarding advice notes or liaise directly with the airport operator for advice on proposed developments.</p>			<p>Modification to the supporting text to include Kenley Aerodrome recommended by Defence Infrastructure Organisation</p> <p>Amended safeguarding zone from 30km to 55km as recommended by Gatwick Airport</p>
MM93	139	Policy S1	Indicators	Annual Target / Plan Period Target	Data source	<p>Modified to reflect increased housing supply and trajectory.</p> <p>Necessary for effectiveness</p>

			Net additional dwelling completions	<p>Annual target – average of at least TBC dpa in line with current trajectory: 152 dwellings per annum from years 1 to 4 (2022/23 – 2025/206) and <u>386 dwellings per annum</u> for years 5 to 18 (2026/27 – 2039/40)</p> <p>Plan target – delivery of at least 4,700 <u>6,012</u> dwellings over the plan period (2022-2040)</p>	<p>Planning decisions and appeals</p> <p>Monitoring data</p>		
			Annual Net delivery of Gypsy pitches permitted and completed	<p><u>at least 180</u> pitches over the Local Plan period (as per need identified in the GTAA)</p>	<p>Planning decisions and appeals that <u>deliver additional gypsy and traveller pitches</u></p> <p>Monitoring data</p>		
			The amount of net employment floorspace permitted and	<p>Plan target - <u>at least 41,464 sqm of additional employment floorspace</u></p>	<p>Planning decisions and appeals that <u>result in a loss or gain in</u></p>		

			<div>completed each year</div> <div>Assess trends against identified needs in the HEDNA</div> <div>employment floorspace Monitoring data CoStar platform or similar real estate information company at local plan review stage</div>										
			<div>The amount of net Change in retail floorspace permitted and completed each year</div> <div>No specific target Assess trends against identified needs in the retail study</div> <div>Planning decisions and appeals that result in a net loss of retail floorspace Monitoring data</div>										
MM94	139	Policy S2	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Number of planning applications refused</td><td>n/a</td><td>Planning applications and appeals</td></tr><tr><td>Number of planning applications permitted that do not fully comply with policy</td><td>No specific targets n/a</td><td>Planning applications and appeals</td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	Number of planning applications refused	n/a	Planning applications and appeals	Number of planning applications permitted that do not fully comply with policy	No specific targets n/a	Planning applications and appeals	Necessary for effectiveness
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Number of planning applications permitted that do not fully comply with policy	No specific targets n/a	Planning applications and appeals											

			requirements following a viability review.															
MM95	140	Policy S3	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Number of residential schemes that comply/that do not comply with the policy requirements <u>Strategic Policy that will be monitored through indicators of more detailed DM policies</u></td><td>No specific targets n/a</td><td>Planning decisions and appeals <u>Authority Monitoring Report</u></td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	Number of residential schemes that comply/that do not comply with the policy requirements <u>Strategic Policy that will be monitored through indicators of more detailed DM policies</u>	No specific targets n/a	Planning decisions and appeals <u>Authority Monitoring Report</u>	Necessary for effectiveness					
Indicators	Annual Target / Plan Period Target	Data source																
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MM96	140	Policy S4	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Regeneration of 13 strategic allocations in the town centre</td><td>Delivery of sites over Local Plan period in accordance with the trajectory.</td><td>Planning decisions and appeals Monitoring data</td></tr><tr><td><u>Change in floorspace for town centre uses over the plan period</u></td><td><u>Plan period- an increase in floorspace for town centre uses.</u></td><td><u>Planning decisions and appeals</u> <u>Monitoring data</u></td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	Regeneration of 13 strategic allocations in the town centre	Delivery of sites over Local Plan period in accordance with the trajectory.	Planning decisions and appeals Monitoring data	<u>Change in floorspace for town centre uses over the plan period</u>	<u>Plan period- an increase in floorspace for town centre uses.</u>	<u>Planning decisions and appeals</u> <u>Monitoring data</u>	Necessary for effectiveness		
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			<u>Implementation of proposals set out within the Local Cycling and Walking infrastructure Plan</u>	<u>Priority schemes delivered over the Local Plan period.</u>	<u>Infrastructure Delivery Plan</u>											
MM97	140	Site Allocation-SA1 to SA35	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of sites</td><td>To deliver sites over the Local Plan period in accordance with the trajectory.</td><td>Planning appeals and decisions Monitoring data</td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	Delivery of sites	To deliver sites over the Local Plan period in accordance with the trajectory.	Planning appeals and decisions Monitoring data	Delete Text not justified				
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Delivery of sites	To deliver sites over the Local Plan period in accordance with the trajectory.	Planning appeals and decisions Monitoring data														
MM98		SA1 Southern Gas Network Site	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 455 dwellings and a bespoke performing arts centre for the Laine Theatre Arts</u></td><td><u>Delivery of development by 2030 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr><tr><td></td><td></td><td></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 455 dwellings and a bespoke performing arts centre for the Laine Theatre Arts</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>				Necessary for effectiveness	
Indicators	Annual Target / Plan Period Target	Data source														
<u>Delivery of at least 455 dwellings and a bespoke performing arts centre for the Laine Theatre Arts</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>														
MM99		SA2 Hook Road Car Park	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness							
Indicators	Annual Target / Plan Period Target	Data source														

			<u>Delivery of at least 145 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		
MM100		SA3 Solis House, 20 Hook Road	Indicators <u>Delivery of at least 20 dwellings</u>	Annual Target / Plan Period Target <u>Delivery of development by 2030 in accordance with the trajectory</u>	Data source <u>Planning appeals and decisions</u> <u>Monitoring data</u>		Necessary for effectiveness
MM101		SA4 Bunzl, Hook Road	Indicators <u>Delivery of at least 35 dwellings</u>	Annual Target / Plan Period Target <u>Delivery of development by 2027 in accordance with the trajectory</u>	Data source <u>Planning appeals and decisions</u> <u>Monitoring data</u>		Necessary for effectiveness
MM102		SA5 Epsom Town Hall	Indicators <u>Delivery of at least 90 dwellings</u>	Annual Target / Plan Period Target <u>Delivery of development by 2029 in accordance with the trajectory</u>	Data source <u>Planning appeals and decisions</u> <u>Monitoring data</u>		Necessary for effectiveness
MM103		SA6 Hope Lodge Car Park	Indicators	Annual Target / Plan Period Target	Data source		Necessary for effectiveness

			<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM104		SA7 Former Police and Ambulance Station Site				Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			<u>Delivery of at least 85 residential, nursing and dementia care bedrooms for the elderly</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM105		SA8 Epsom Clinic				Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM106		SA9 Depot Road and Upper High Street Car Park				Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			<u>Delivery of at least 100 dwellings and public car parking</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	

MM107		SA10 79-85 East Street	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 34 dwellings</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 34 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness
Indicators	Annual Target / Plan Period Target	Data source								
<u>Delivery of at least 34 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>								
MM108		SA11 Finachem House	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of purpose built student accommodation to provide at least 90 student bedrooms or a scheme of at least 35 dwellings.</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of purpose built student accommodation to provide at least 90 student bedrooms or a scheme of at least 35 dwellings.</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness
Indicators	Annual Target / Plan Period Target	Data source								
<u>Delivery of purpose built student accommodation to provide at least 90 student bedrooms or a scheme of at least 35 dwellings.</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>								
MM109		SA12 Global House	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 75 dwellings</u></td><td><u>Delivery of development by 2030 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 75 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness
Indicators	Annual Target / Plan Period Target	Data source								
<u>Delivery of at least 75 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>								
MM110		SA13 Swail House	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness			
Indicators	Annual Target / Plan Period Target	Data source								

			<u>Refurbishment of Swail house to provide at least 45 dwellings</u> <u>The construction of at least 45 specialist accommodation dwellings for the Royal National Institute of Blind People (RNIB)</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>								
MM111		SA14 60 East Street	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 30 dwellings</u></td><td><u>Delivery of development by 2027 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2027 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2027 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM112		SA15 Corner of Kiln Lane and East Street (101b East Street)	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 5 dwellings</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 5 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 5 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM113		SA16 Land at Kiln Lane	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness				
Indicators	Annual Target / Plan Period Target	Data source											

			<u>Delivery of at least 40 dwellings</u>	<u>Delivery of development by 2035 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM114		SA17 Hatch Furlong Nursery				Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2031 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM115		SA18 Land to the rear of Rowe Hall				Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			<u>Delivery of an extra care accommodation to provide at least 96 self contained apartments, staff and communal facilities</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM116		SA19 7 Station Approach				Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			<u>Delivery of at least 8 dwellings</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	

MM117		SA20 Esso Express, 26 Reigate Road	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			<u>Delivery of at least 10 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM118		SA21 Richards Fields Car Park	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			<u>Delivery of at least 7 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM119		SA22 Etwelle House, Station Road	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			<u>Delivery of at least 20 dwellings</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM120		SA24 Garages at Somerset Close and Westmorland Close	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			<u>Delivery of at least 7 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	

MM121		SA25 64 South Street				Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM122		SA26 35 Alexandra Road				Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			<u>Delivery of at least 8 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM123		SA27 22-24 Dorking Road				Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			<u>Delivery of at least 18 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM124		SA28 63 Dorking Road				Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	

MM125		SA30 Epsom General Hospital	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			<u>Delivery of at least 305 units if older people's accommodation</u>	<u>Delivery of development by 2029</u>	<u>Planning appeals and decisions</u>	
			<u>Delivery of at least 24 key worker dwellings</u>		<u>Monitoring data</u>	
MM126		SA31 Land at West Park Hospital (South)	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			<u>Delivery of at least 50 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u>	
					<u>Monitoring data</u>	
MM127		SA32 Land at West Park Hospital (North)	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			<u>Delivery of at least 180 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u>	
					<u>Monitoring data</u>	
MM128		SA33 Land at Land at Chantilly Way	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness

			<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2031 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>										
MM129		SA34 Hook Road Arena	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 100 dwellings</u></td><td><u>Delivery of development by 2033 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr><tr><td><u>Delivery of a new sports hub to include playing pitches, a new pavilion and changing facilities</u></td><td><u>Delivery of development by 2033</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 100 dwellings</u>	<u>Delivery of development by 2033 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	<u>Delivery of a new sports hub to include playing pitches, a new pavilion and changing facilities</u>	<u>Delivery of development by 2033</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u>	Necessary for effectiveness
Indicators	Annual Target / Plan Period Target	Data source													
<u>Delivery of at least 100 dwellings</u>	<u>Delivery of development by 2033 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>													
<u>Delivery of a new sports hub to include playing pitches, a new pavilion and changing facilities</u>	<u>Delivery of development by 2033</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u>													
MM130		SA35 Land at Horton Farm	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 1,250 dwellings including some specialist accommodation</u></td><td><u>Delivery of development by 2040 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u></td></tr><tr><td><u>Delivery of at least 10 gypsy and traveller pitches</u></td><td><u>Delivery by 2035</u></td><td><u>Planning appeals and decisions</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 1,250 dwellings including some specialist accommodation</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u>	<u>Delivery of at least 10 gypsy and traveller pitches</u>	<u>Delivery by 2035</u>	<u>Planning appeals and decisions</u>	Necessary for effectiveness
Indicators	Annual Target / Plan Period Target	Data source													
<u>Delivery of at least 1,250 dwellings including some specialist accommodation</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u>													
<u>Delivery of at least 10 gypsy and traveller pitches</u>	<u>Delivery by 2035</u>	<u>Planning appeals and decisions</u>													

					Monitoring data		
			<u>Delivery of community building</u>	<u>Delivery by 2035</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u>		
			<u>Delivery of a public park of approximately 7ha</u>	<u>Delivery by 2035</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u>		
MM131		SA36 25 Alexandra Road Epsom	Indicators	Annual Target / Plan Period Target	Data source		Necessary for effectiveness
			<u>Delivery of at least 11 dwellings</u>	<u>Delivery of development by 2036 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		
MM132		SA37 Gainsborough Road Estate	Indicators	Annual Target / Plan Period Target	Data source		Necessary for effectiveness
			<u>Delivery of at least 8 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		

MM133		SA38 Parking at 54 Gainsborough Road	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2031 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM134		SA39 85b Hook Road Epsom	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2037 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM135		SA40 Land west of Ewell By-Pass	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			<u>Delivery of at least 38 dwellings</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM136		SA41 Conservative Club, Epsom Club and Church	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			<u>Delivery of at least 28 dwellings</u>	<u>Delivery of development by 2038 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	

MM137		SA42 TK Maxx	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 17 dwellings</u></td><td><u>Delivery of development by 2039 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 17 dwellings</u>	<u>Delivery of development by 2039 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness
Indicators	Annual Target / Plan Period Target	Data source										
<u>Delivery of at least 17 dwellings</u>	<u>Delivery of development by 2039 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>										
MM138		SA43 Land R/O The Albion Public House (Mccaffertys Bar)	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 11 dwellings</u></td><td><u>Delivery of development by 2037 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 11 dwellings</u>	<u>Delivery of development by 2037 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness
Indicators	Annual Target / Plan Period Target	Data source										
<u>Delivery of at least 11 dwellings</u>	<u>Delivery of development by 2037 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>										
MM139		SA44 Spread Eagle	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 22 dwellings</u></td><td><u>Delivery of development by 2040 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 22 dwellings</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness
Indicators	Annual Target / Plan Period Target	Data source										
<u>Delivery of at least 22 dwellings</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>										
MM140		SA45 Auction House	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 10 dwellings</u></td><td><u>Delivery of development by 2040 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 10 dwellings</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness
Indicators	Annual Target / Plan Period Target	Data source										
<u>Delivery of at least 10 dwellings</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>										

MM141		SA46 Laine Theatre Arts				Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2033 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM142		SA47 Eclipse Business Park, West Hill				Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			<u>Delivery of at least 23 dwellings</u>	<u>Delivery of development by 2036 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM143		SA48 Cuddington Glade				Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			<u>Delivery of a 70 bed Care Home</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM144		SA49 Land off Cuddington Glade				Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			<u>Delivery of at least 50 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	

MM145		SA50 Land at Priest Hill	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			<u>Delivery of at least 275 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM146		SA51 Downs Farm	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			<u>Delivery of at least 530 dwellings</u>	<u>Delivery of development by 2035 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
			<u>Delivery of a new specialist school of up to 2.5ha</u>	<u>Delivery of development by 2035 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	
MM147	140	Policy S5 Housing Mix and Type	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			<u>Annual Cumulative housing mix delivery (and cumulatively over the plan period) for market housing</u>	Approximate proportions: 1 bed – 10% 2 bed – 35% 3 bed – 35% 4 bed – 20%	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	

			<p>policy not compliant with policy S6:</p> <p>Number of affordable home completions (and as a % of total net completions)</p> <p>Number of households on the Housing Register</p>	<p>n/a</p> <p>Reducing over the plan period</p>	<p>Planning decisions and appeals Authority Monitoring Report</p> <p>Housing register</p>		
MM149	142	Policy S7 Specialist housing	<p>Indicators</p> <p>Number of planning decisions including appeals allowing specialist accommodation</p> <p>Number of specialist dwellings lost</p> <p>Number of additional specialist dwellings and bedrooms</p>	<p>Annual Target / Plan Period Target</p> <p>In line with site allocations and all other proposals consistent with the requirements of policy S7.</p> <p>No net loss of plan period.</p> <p>n/a Increase in <u>specialist accommodation over the plan</u></p>	<p>Data source</p> <p>Planning appeals and decisions <u>Authority Monitoring Report</u></p> <p>Planning appeals and decisions <u>Authority Monitoring Report</u></p> <p>Completions, planning appeals and decisions</p>		Necessary for effectiveness

				<u>period to assist in meeting identified needs</u> <u>Elderly and Extra Care</u> <u>Student accommodation</u>	<u>Authority Monitoring Report</u>														
MM150	143	Policy S8 Gypsies, Travellers and Travelling Showpeople	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Number of pitches permitted via planning decisions including appeals</td><td>18 gypsy pitches over the plan period</td><td>Planning decisions and appeals</td></tr><tr><td>Number of pitches lost via planning decisions including appeals</td><td>No net loss of pitches over the plan period</td><td>Planning appeals and decisions</td></tr><tr><td></td><td></td><td></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	Number of pitches permitted via planning decisions including appeals	18 gypsy pitches over the plan period	Planning decisions and appeals	Number of pitches lost via planning decisions including appeals	No net loss of pitches over the plan period	Planning appeals and decisions				Necessary for effectiveness	
Indicators	Annual Target / Plan Period Target	Data source																	
Number of pitches permitted via planning decisions including appeals	18 gypsy pitches over the plan period	Planning decisions and appeals																	
Number of pitches lost via planning decisions including appeals	No net loss of pitches over the plan period	Planning appeals and decisions																	
MM151	143	Policy S9 Economic Development	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Loss/gain of employment floorspace in Epsom Town Centre</u></td><td><u>No net loss over plan period.</u></td><td><u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Loss/gain of employment floorspace in Epsom Town Centre</u>	<u>No net loss over plan period.</u>	<u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u>	Necessary for effectiveness							
Indicators	Annual Target / Plan Period Target	Data source																	
<u>Loss/gain of employment floorspace in Epsom Town Centre</u>	<u>No net loss over plan period.</u>	<u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u>																	

			Increase in floorspace in economic use at the Strategic Employment Sites	34,500sqm of additional floorspace to be delivered on strategic employment sites across the plan period	Planning decisions and appeals	
			Loss of floorspace in economic use outside of the Strategic Employment Sites	Assess trends	Planning decisions and appeals	
			<u>Loss/gain of floorspace and land in use by the racecourse and racehorse training sector</u>	<u>No net loss over plan period.</u>	<u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u>	
			<u>Loss/gain of floorspace and land in use the creative and cultural sector and further and higher education providers</u>	<u>No net loss over plan period.</u>	<u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u>	

MM152	143	Policy S10 Retail Hierarchy and Network	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			Number of planning decisions including appeals allowing main town centre uses outside of the centres	Assess trends No specific target. Monitoring Only	Planning decisions and appeals	
MM153	143	Policy DM4 Primary Shopping Areas and Retail Frontages	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			Planning permissions approved in the town centre for appropriate town centre uses (as defined in the NPPF)	Assess trends No specific target. Monitoring Only	Planning decisions and appeals	
MM154	143	Policy DM5 Edge of Centre or Out of Centre Proposals	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			Number of planning decisions including appeals allowing main town centre uses outside of the centres	Assess trends No specific target. Monitoring Only	Planning decisions and appeals	

MM155	144	Policy DM6 Edge of Centre or Out of Centre Proposals	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Number of planning decisions including appeals allowing appropriate uses within the neighbourhood parade</td><td>Assess trends <u>No specific target.</u> <u>Monitoring Only</u></td><td>Planning decisions and appeals</td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	Number of planning decisions including appeals allowing appropriate uses within the neighbourhood parade	Assess trends <u>No specific target.</u> <u>Monitoring Only</u>	Planning decisions and appeals	Necessary for effectiveness			
Indicators	Annual Target / Plan Period Target	Data source											
Number of planning decisions including appeals allowing appropriate uses within the neighbourhood parade	Assess trends <u>No specific target.</u> <u>Monitoring Only</u>	Planning decisions and appeals											
MM156	144	Policy DM7 Loss of Employment Land	<table><tr><td colspan="3">Policy DM7 Loss of Employment Land</td></tr><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Annual commercial, business and service (Class E) floorspace change (and cumulatively over the plan period)</td><td><u>Plan target - at least 41,464 sqm of additional employment floorspace</u> Assess trends</td><td>Planning decisions and appeals</td></tr></table>	Policy DM7 Loss of Employment Land			Indicators	Annual Target / Plan Period Target	Data source	Annual commercial, business and service (Class E) floorspace change (and cumulatively over the plan period)	<u>Plan target - at least 41,464 sqm of additional employment floorspace</u> Assess trends	Planning decisions and appeals	Necessary for effectiveness
Policy DM7 Loss of Employment Land													
Indicators	Annual Target / Plan Period Target	Data source											
Annual commercial, business and service (Class E) floorspace change (and cumulatively over the plan period)	<u>Plan target - at least 41,464 sqm of additional employment floorspace</u> Assess trends	Planning decisions and appeals											
MM157	144	Policy DM8 Racehorse Training Zone	<table><tr><td colspan="3"><u>Policy DM8 Epsom Downs Racecourse and the Racehorse Training Industry Racehorse Training Zone</u></td></tr><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Loss of land to non-equestrian uses in the defined Racecourse <u>Racehorse Training Zone</u></td><td>No loss of land to non-racehorse training uses in the Racecourse <u>Racehorse Training Zone</u></td><td>Planning decisions and appeals</td></tr></table>	<u>Policy DM8 Epsom Downs Racecourse and the Racehorse Training Industry Racehorse Training Zone</u>			Indicators	Annual Target / Plan Period Target	Data source	Loss of land to non-equestrian uses in the defined Racecourse <u>Racehorse Training Zone</u>	No loss of land to non-racehorse training uses in the Racecourse <u>Racehorse Training Zone</u>	Planning decisions and appeals	<p>Title amended to reflect change.</p> <p>Amended ‘Racecourse’ to ‘Racehorse’.</p> <p>Necessary for effectiveness</p>
<u>Policy DM8 Epsom Downs Racecourse and the Racehorse Training Industry Racehorse Training Zone</u>													
Indicators	Annual Target / Plan Period Target	Data source											
Loss of land to non-equestrian uses in the defined Racecourse <u>Racehorse Training Zone</u>	No loss of land to non-racehorse training uses in the Racecourse <u>Racehorse Training Zone</u>	Planning decisions and appeals											
MM158	144	Policy DM9 Visitor Accommodation		Necessary for effectiveness									

			Indicators	Annual Target / Plan Period Target	Data source		
			Planning permissions or appeals granted for visitor accommodation (number of units and bedspaces)	No specific target. <u>Monitoring only</u> Assess trends	Planning decisions and appeals		
			Planning permissions or appeals granted for the loss of visitor accommodation (number of units and bedspaces)	No specific target. <u>Monitoring only</u> Assess trends	Planning decisions and appeals		
MM159	145	Policy S11 Design	Policy S11 Design and Heritage				Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source		
			Planning permissions refused based on the policy	No specific target. <u>Monitoring Only</u> Assess trends	Planning decisions and appeals		
MM160	145	Policy S12 Amenity Protection	Policy S12 DM24 Amenity Protection				Title change to reflect the policy
			Indicators	Annual Target / Plan Period Target	Data source		
			Planning permissions refused based on the policy	No specific target. <u>Monitoring Only</u> Assess trends	Planning decisions and appeals		Necessary for effectiveness

MM161	145	Policy DM10 Building Emissions Standards	Policy DM10 Building Emissions and Energy Standards			Title change & additional indicator Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			Planning permissions for residential use approved supported by an appropriate Energy Assessment	All residential planning applications relevant planning applications are accompanied by an Energy Assessment demonstrating policy requirements can be met.	Planning decisions and appeals	
MM162	146	Policy DM12 Health Impact Assessment	Planning permission for non residential developments achieving BREEAM Excellent or any equivalent new standard	All new non-residential developments achieving BREEAM Excellent or any equivalent new standard	Planning decisions and appeals	Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			Number of planning applications that include a health Planning permissions inclusion of an	All eligible applications to include a permissions include a health impact	Planning decisions and appeals ONS Health Data	

			impact assessment, if required.	assessment, if required. No specific target, monitoring only.		
MM163	146	Policy S13 Preserving identity of place with heritage	Policy S13 Preserving identity of place with heritage			Policy deleted, monitoring indicator no longer necessary
			Indicators	Annual Target / Plan Period Target	Data source	
			Net gain/loss of listed buildings	No loss of designated heritage assets	Planning decisions and appeals	
			Number of listed buildings at risk	No increase in number of Listed Buildings identified as at risk	Buildings at risk register	
MM164	146	Policy DM13 Development Impacting Heritage Assets				Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			Net gain/loss of listed buildings	No loss of designated heritage assets	Planning decisions and appeals	
			Number of nationally listed buildings at risk	No loss of designated heritage assets	Planning decisions and appeals	
MM165	146	Policy DM14 Shopfronts, new indicator	Policy DM14 Shopfronts			Necessary for effectiveness
			Indicators	Annual Target / Plan Period Target	Data source	
			Planning appeals where the council refused permission for	No appeal decisions allowed relating to shopfront design.	Planning decisions and appeals	

			<u>shopfronts for being contrary to the council's shopfront policy</u>														
MM166	146-147	Policy DM15 Green Belt	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td>Number of planning decisions, including appeals, granting permission for inappropriate development in the Green Belt, where very special circumstances that outweigh harm have not otherwise been identified</td><td>Assess trends <u>No specific target, monitoring only</u></td><td>Planning decisions and appeals</td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	Number of planning decisions, including appeals, granting permission for inappropriate development in the Green Belt, where very special circumstances that outweigh harm have not otherwise been identified	Assess trends <u>No specific target, monitoring only</u>	Planning decisions and appeals	Necessary for effectiveness				
Indicators	Annual Target / Plan Period Target	Data source															
Number of planning decisions, including appeals, granting permission for inappropriate development in the Green Belt, where very special circumstances that outweigh harm have not otherwise been identified	Assess trends <u>No specific target, monitoring only</u>	Planning decisions and appeals															
MM167		Policy DM16 Landscape Character (New indicator under DM15)	<table><tr><th colspan="3">Policy DM16 Landscape Character</th></tr><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Planning applications and appeals within Area of great landscape value</u></td><td><u>No appeal decisions allowed for major development relating to the landscape character policy</u></td><td><u>Planning decisions and appeals</u></td></tr></table>				Policy DM16 Landscape Character			Indicators	Annual Target / Plan Period Target	Data source	<u>Planning applications and appeals within Area of great landscape value</u>	<u>No appeal decisions allowed for major development relating to the landscape character policy</u>	<u>Planning decisions and appeals</u>	Necessary for effectiveness	
Policy DM16 Landscape Character																	
Indicators	Annual Target / Plan Period Target	Data source															
<u>Planning applications and appeals within Area of great landscape value</u>	<u>No appeal decisions allowed for major development relating to the landscape character policy</u>	<u>Planning decisions and appeals</u>															

MM168	147	Policy S14 Biodiversity and Geodiversity	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			Condition status of SSSIs	No Specific Target Improvements to condition of SSSIs in line with targets in Local Nature Recovery Strategy	Site surveys	
			Condition status of SNCI	No Specific Target Improvements in condition status	Surveys and DEFRA returns	
MM169	147	Policy S14 DM25– Biodiversity Net Gain	Indicators	Annual Target/Plan Period Target	Data source	
			Percentage of major planning applications delivering at least 10% biodiversity net gain	All qualifying development obligated to achieving at least 10% biodiversity net gain or 20% where specified in a site allocation policy	Planning decisions and appeals	
MM170	147	Policy DM17 Trees, Woodlands and Hedgerows	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			New development proposals including landscape plans	All relevant qualifying planning applications to include appropriate landscape plans	Surveys and DEFRA returns	

MM171	147	Policy S16 Flood Risk and Sustainable Drainage	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			Number of planning permissions granted contrary to Environment Agency advice on flooding and water grounds	<u>No specific target.</u> Number of planning applications permitted or appeals allowed contrary to advice of the Environment Agency	Planning decisions and appeals	
MM172	148	Policy DM18 Pollution and Contamination	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			Number of planning decisions including appeals allowing development that is not in accordance with this policy	<u>No specific target.</u> Number of relevant planning applications that are not in accordance with the policy	Planning decisions and appeals	
MM173	148	Policy S17 Infrastructure Delivery (additional indicator)	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness
			<u>Delivery of infrastructure schemes identified in the IDP as being</u>	<u>Delivery of infrastructure achieved within anticipated timeframe.</u>	<u>Infrastructure Delivery Plan</u>	

			delivered in years 1-5		Engagement with infrastructure providers Authority Monitoring Report		
			Delivery of infrastructure schemes identified in the IDP as being delivered 'across all years'.	Delivery of infrastructure to support new development.	Infrastructure Delivery Plan Engagement with infrastructure providers Authority Monitoring Report		
			Delivery of infrastructure required by Site Allocation policies	Infrastructure delivered to support new development.	Planning decisions. Infrastructure Delivery Plan Engagement with infrastructure providers Authority Monitoring Report		
			Local Cycling and Walking Infrastructure Plan (LCWIP) and Local	No specific target. Priority LCWIP and LSI projects	Infrastructure Delivery Plan		

			<u>Street Improvements (LSI).</u> <u>Primary care facility at Horton Farm (SA35) or an equivalent financial contribution towards off-site provision of new or improvement to existing health facilities</u> <u>GP practice extensions / redevelopment / reconfiguration as needed</u> <u>New Sports Hub for the borough to include playing pitches (grass and artificial), a new pavilion and changing facilities. Provision at site allocation SA34</u>	<u>progressed over the Local Plan period.</u> <u>Estimated delivery date 2032 to 2037.</u> <u>No specific target. Improvements to be delivered over plan period dependent upon need.</u> <u>Estimated to be delivered between 2032 and 2037</u>	<u>Authority Monitoring Report</u> <u>Planning Applications</u> <u>Infrastructure Delivery Plan</u> <u>Authority Monitoring Report</u> <u>Infrastructure Delivery Plan</u> <u>Planning Applications</u> <u>Infrastructure Delivery Plan</u> <u>Authority Monitoring Report</u>		
MM174	148	Policy S18 Green and Blue Infrastructure	Indicators	Annual Target / Plan Period Target	Data source		Necessary for effectiveness

			Number of planning decisions including appeals that secure the provision of green infrastructure through new development	No specific targets. Monitoring only. Assess trends	Planning decisions and appeals		
			Number of planning decisions including appeals allowing the loss of existing green infrastructure	No net loss of existing green infrastructure	Planning decisions and appeals		
MM175	149	Policy DM19 Open Space, Sport and Recreation, second indicator	Indicators	Annual Target / Plan Period Target	Data source		Necessary for effectiveness
			Number of planning decisions including appeals which create new or enhance open space or sport and recreational buildings/land	No specific targets. Monitoring only. Assess trends	Planning decisions and appeals		
MM176	149	Policy DM20 Community and Cultural Facilities	Indicators	Annual Target / Plan Period Target	Data source		Necessary for effectiveness

			Gains/losses of Use Class F1 and F2 facilities	No specific targets. Monitoring only. Assess trends	Planning decisions and appeals		
			Developer contributions securing social and community infrastructure	No specific targets. Monitoring only. Assess trends	Funding and space secured (authority monitoring report)		
MM177	149	Policy DM21 Education Infrastructure	Indicators	Annual Target / Plan Period Target	Data source		Policy deleted, indicator no longer necessary
			Number of planning decisions including appeals allowing additional education floorspace	Assess trends	Planning decisions and appeals		
MM178	149	Policy S19 Transport	Indicators	Annual Target / Plan Period Target	Data source		Necessary for effectiveness
			Percentage of developments supported by a Travel Plan Applications supported by a Transport Assessment and	100% of qualifying developments All qualifying developments	Planning applications, appeal monitoring, decisions and appeals Authority Monitoring Report		

			<p><u>on site plan to reduce car use and promote sustainable transport modes.</u></p>			
			<p><u>Use of sustainable travel modes</u></p>	<p>Increase in travel to work Modal share by sustainable travel modes in 2031 Census over 2021 baseline:</p>	<p>Census – every 10 years SCC data on sustainable transport:</p>	
			<p><u>Number of car club vehicles and cycles available for public cycle rental schemes</u></p>	<p>No specific target. Monitoring only.</p>	<p><u>Planning decisions and appeals</u> Authority Monitoring Report</p>	
			<p><u>Number of LCWIP priority schemes implemented</u></p>	<p>No specific target. Monitoring only.</p>	<p><u>Planning decisions and appeals</u> Authority Monitoring Report</p>	
			<p><u>Number of car free developments implemented</u></p>	<p>No specific target. Monitoring only.</p>	<p><u>Planning decisions and appeals</u> Authority Monitoring Report</p>	
MM179	153-160	Appendix 1: Glossary	<p>Community Facilities: Includes, but is not limited to, facilities such as community centres and other community meeting</p>			Replaced 'Community Facilities' in the glossary with

		<p>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.</p> <p>Social Infrastructure and Community Facilities: Includes, but is not limited to, healthcare facilities, education facilities, childcare facilities childcare facilities, leisure centres/sports halls, community centres/halls, libraries, public houses, the voluntary sector, public service providers, places of worship and cultural buildings such as theatres and arts centres.</p> <p>District Licencing Scheme: <u>Great crested newts are a European protected species. District level licensing is an alternative approach to mitigation licensing for planning applications to develop sites which could affect great crested newts. The scheme is operated in accordance with Government Guidance.</u></p> <p>Essential Local Workers: <u>Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers.</u></p> <p>Green and Blue Infrastructure (GI): <u>Green and blue infrastructure includes individual natural components that are connected into network fulfilling multi-functional roles with multiple benefits to the local community, economy and environment. Green features may include (but are not limited to) open space, parks, public and private gardens, woodlands, playing fields, allotments, trees, green roofs/walls and blue features may include rivers, streams, footpaths and shared</u></p>	<p>‘Social Infrastructure and Community Facilities.</p> <p>Additional entry in the Appendix to define District Licencing Scheme</p> <p>Essential local workers housing defined in the glossary which is captured under policy S5</p> <p>Amended definition to be consistent with S18</p>
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		<p>surfaces, green and sustainable drainage systems. A network of multi-functional green and blue space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.</p> <p>High frequency bus corridor Sections of highway where bus services operate with a frequency of at least 3 bus services per hour, on average, for a weekday between the hours of 07:00 & 19:00</p> <p>Parking Stress: The measure of the saturation levels of parking in a defined area and expressed in percentage terms.</p> <p>Racecourse Area: The track used by racehorses and the associated facilities, including the built area which constitutes the stables, stands, administration building, parade ring and hardstanding.</p> <p>Racehorse Training Yards: Specialised Thoroughbred equestrian facilities where thoroughbred racehorses are stabled. Facilities can include stables, paddocks/turnout pens, tack rooms, horse walkers, staff accommodation and other specialised training equipment.</p> <p>Racehorse Movement Corridors: Routes travelled by racehorses to and from training yards to access the racehorse training grounds.</p> <p>Racehorse Training Grounds: Specialised Thoroughbred equestrian facilities designed to condition and / or stable thoroughbreds for racing. This includes gallops which are managed to provide a variety of surfaces and terrains that mimic race conditions.</p>	<p>New entry for effectiveness</p> <p>New entry necessary in relation to policy S11</p> <p>New entry for effectiveness and consistency. Define Racehorse training terms in policy DM8</p> <p>New entry for effectiveness and consistency, Social</p>
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			<p>Social Infrastructure and Community Facilities: <u>Includes, but is not limited to, healthcare facilities, education facilities, childcare facilities childcare facilities, leisure centres/sports halls, community centres/halls, libraries, public houses, the voluntary sector, public service providers, places of worship and cultural buildings such as theatres and arts centres.</u></p> <p>Specialist Housing: <u>Housing specifically designated to meet the identified needs of specialised groups, such as the elderly, disabled or student population</u> older people and people with support needs. It can include extra care housing.</p>	Infrastructure and Community Facilities defined consistent with DM20			
MM180	162	Appendix 2: Housing Trajectory, page 162-163	See Appendix A1.	To include most up to date trajectory			
MM181	169	Appendix 4: Vehicle Parking Standards, A4.1 third paragraph	<u>The car parking standards identified in this appendix are maximums.</u> In light of the above, there are likely to be situations where <u>lower levels of parking</u> 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).				
MM182	178	Table A5 Types of Use and Minimum Marketing Periods	<table><tr><td>Policy DM8 – Racehorse Training Zone</td><td>Racehorse training industry or equestrian</td><td>18-24 months</td></tr></table>	Policy DM8 – Racehorse Training Zone	Racehorse training industry or equestrian	18-24 months	Modifications for effectiveness and consistency with amended policy
Policy DM8 – Racehorse Training Zone	Racehorse training industry or equestrian	18-24 months					
MM183	185	Appendix 6: Guidance for Proposals Impacting Heritage Assets A6.2.1	<p>A6.2.1 Scheduled Ancient Monuments and Areas of High Archaeological Potential</p> <p>The Borough contains two Scheduled Ancient Monuments (SAM) - the site of Nonsuch Palace and its associated remains, and St Mary’s Church Tower in Ewell. Additionally, there is one</p>	Modification necessary for effectiveness			

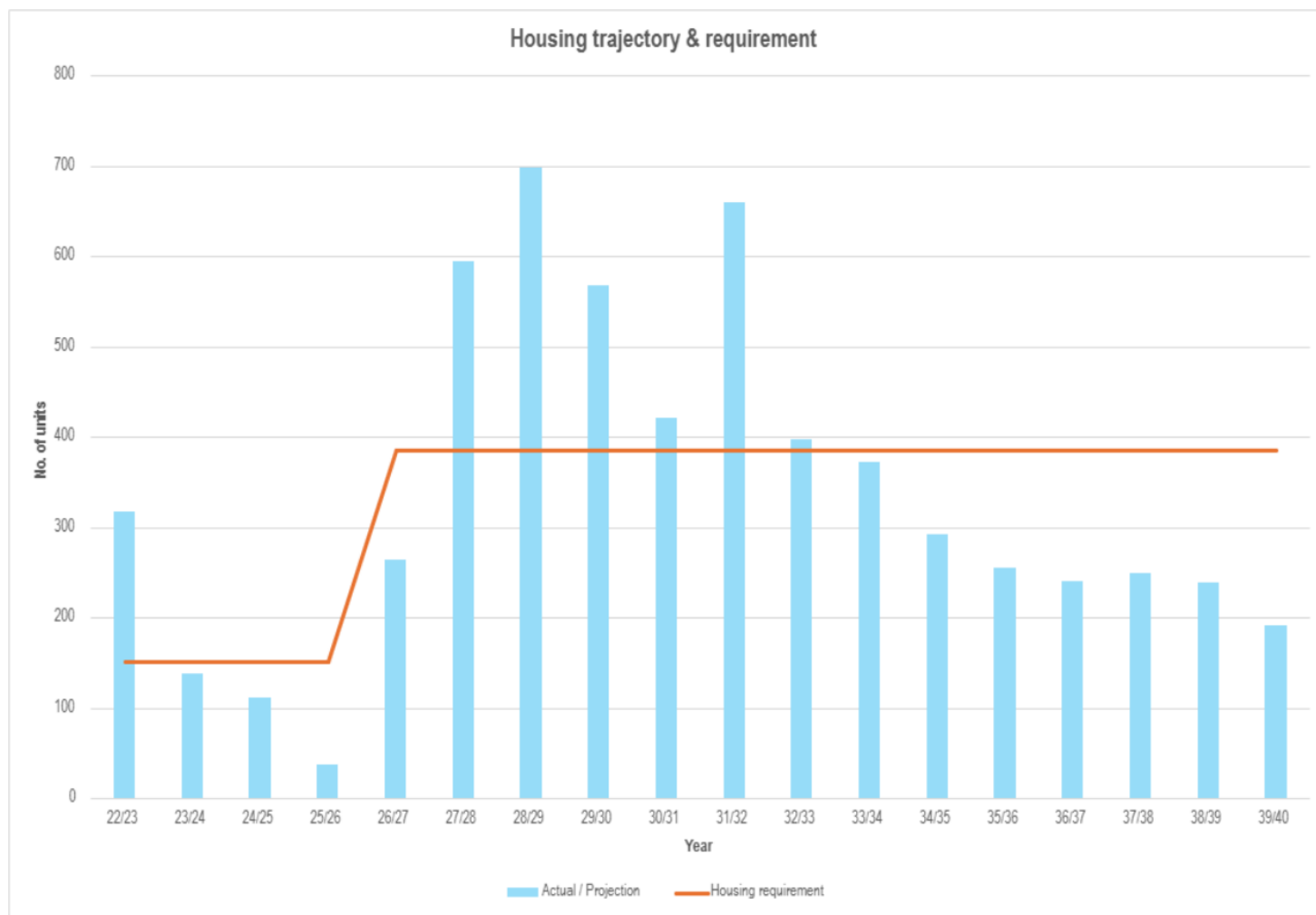
			<p>identified County Site of Archaeological Importance in the Borough - 'Diana's Dyke', a site close to Nonsuch Palace. All proposals will be expected to follow all National Government and County National and County Policy and Guidance regarding these sites. In the majority of instances, the advice of Surrey County Council should also be sought. <u>Scheduled Monument Consents are determined by Historic England and not local authorities.</u></p> <p>Within Areas of High Archaeological Potential, as identified on the Proposals Map, or outside of these areas on any major development site of 0.4ha or greater, applicants are required to undertake prior assessment of the possible archaeological significance of the site and the implications of their proposals, and may be required to submit, as a minimum, a desk-based assessment to accompany any application. Where desk-based assessment <u>is inconclusive, or</u> suggests the likelihood of archaeological remains, the Council will require the results of an archaeological evaluation in order to inform the determination of the application.</p>	
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Appendix A1: Housing Trajectory

SOURCE	No. of units	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	TOTAL
Completions (2022-2026)	605	317	139	112	37															605
Commitments (April 2026) - 671 with 10% lapse rate applied 604	604					200	200	204												604
Small windfall	385								35	35	35	35	35	35	35	35	35	35	35	385
Large windfall	333										37	37	37	37	37	37	37	37	37	333
URBAN SITES (20+)																				
SA1 - Southern Gas Network Site	456						225	116	115											456
SA2 - Hook Road Car Park	145								145											145
SA3 - Solis House, 20 Hook Road	20								20											20
SA4 - Bunzl, Hook Road	35					35														35
SA5 - Epsom Town Hall	90						50	40												90
SA6 - Hope Lodge Car Park	35										35									35
SA7 - Former Police and Ambulance Station Site	47						47													47
SA8 - Epsom Clinic	30							30												30
SA9 - Depot Road & Upper High Street Car Parks	100									50	50									100
SA10 - 79-85 East Street	34							34												34
SA11 - Finachem House, 2-4 Ashley Road	38							38												38
SA12 - Global House	75								75											75
SA13 - Swail House	45						45													45
SA14 - 60 East Street	30					30														30
SA16 - Land at Kiln Lane	40													40						40
SA17 - Hatch Furlong Nursery	30								15	15										30
SA18 - Land rear of Rowe Hall	96							96												96
SA22 - Etwelle House, Station Road	20						20													20
SA40 - Land west of Ewell By-Pass	38																	38		38
SA41 - Conservative Club, Epsom Club and Church	28																28			28
SA44 - Spread Eagle Shopping Centre	22																	22		22
SA47 - Eclipse Business Park, West Hill	23														23					23
SMALL URBAN SITES (5-19)																				
SA15 - Corner of Kiln Lane & East Street (101B East Street)	5							5												5
SA19 - 7 Station Approach, Stoneleigh	8						8													8
SA20 - Esso Express, 26 Reigate Road	10							10												10
SA21 - Richards Field Car Park	7								7											7
SA24 - Garages at Somerset Close & Westmorland Close	6								6											6
SA25 - 64 South Street, Epsom	6							6												6
SA26 - 35 Alexandra Road	8							8												8
SA27 - 22-24 Dorking Road	18							18												18
SA28 - 63 Dorking Road	6							6												6
SA36 - 25 Alexandra Road Epsom Surrey KT17 4BP	11														11					11
SA37 - Gainsborough Road estate, Epsom	8										8									8
SA38 - Parking at 54 Gainsborough Road	6								6											6
SA39 - 85b Hook Road, Epsom	8															8				8
SA42 - TK Maxx	17																17			17
SA43 - Land R/O The Albion Public House (McCaffertys Bar)	11															11				11
SA45 - Auction House, Depot Road	10																	10		10
SA46 - Laine Theatre Arts	6											6								6
GREEN BELT RELEASE																				
SA31 - Land at West Park Hospital - South	50							50												50
SA32 - Land at West Park Hospital - North	180								60	60	60									180
SA33 - Land at Chantilly Way	30								15	15										30
SA34 - Hook Road Arena	100									40	40	20								100
SA35 - Horton Farm	1250									50	100	150	150	150	150	150	150	150	50	1250

SOURCE	No. of units	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	TOTAL
SA48 - Cuddington Glade	37							37												37
SA49 - Land off Cuddington Glade	45										45									45
SA50 - Land at Priest Hill	275								75	100	100									275
SA51 - Downs Farm	530									50	150	150	150	30						530
Actual / Projection		317	139	112	37	265	595	698	568	421	660	398	372	292	279 256	241	250	239	192	6052

Appendix A2: Housing trajectory & requirement



Sustainability Appraisal (SA) of the Epsom and Ewell Local Plan

SA Report Addendum

September 2026

Quality information

Prepared by

Checked by

Approved by

Mark Fessey
Associate Director

Prepared for:
Epsom and Ewell Borough Council

Prepared by:
AECOM Limited
Aldgate Tower
2 Leman Street
London E1 8FA
United Kingdom
aecom.com

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Non-technical summary

This report presents an appraisal of the proposed main modifications (MMs) to the submission version of the Epsom and Ewell Local Plan (as submitted in November 2024) that are currently published for consultation.

The focus of the report is on: A) introducing the proposed MMs (Section 2); and then B) presenting an appraisal (Section 4). Also, consideration is given to the possibility of defining / appraising reasonable alternatives (Section 3), but the conclusion reached is that there are no reasonable alternatives at the current time.

It is important to be clear that this is an “addendum” report and does not aim to supersede the SA Report (2024). However, consideration is given to whether conclusions presented within the SA Report now require adjustment in light of the appraisal set out in this addendum.

The appraisal presented in Section 4 concludes as follows:

The appraisal finds that none of the proposed modifications generate significant effects, either alone or in combination. However, the proposed modifications do have positive implications for the achievement of sustainability objectives relating to meeting housing needs. The most significant aspect of the proposed modifications is the proposal to allocate four new Green Belt sites for a total of 937 homes and, in particular, a focus of the appraisal is the proposal to allocate Downs Farm, to the east of Epsom, for 530 homes. There are inevitably challenges associated with this site given its scale, current use (recent use for agriculture) and location, but as well as making a significant contribution to housing needs it can deliver benefits including affordable housing, land for a school, transport upgrades and large scale open space / sports pitches.

1 Introduction

- 1.1.1 AECOM is commissioned to undertake a Sustainability Appraisal (SA) in support of the emerging Epsom and Ewell Local Plan that is being prepared by Epsom and Ewell Borough Council (EEBC). Once adopted, the 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.
- 1.1.2 The formally required SA Report was published alongside the final draft ('proposed submission') version of the Local Plan in December 2024 under Regulation 19 of the Local Planning Regulations and then submitted to the Government for examination in public alongside the Local Plan in March 2025. The aim of the SA Report, in accordance with Regulations, was essentially to present an appraisal of "the plan and reasonable alternatives" and "an outline of the reasons for selecting the alternatives".
- 1.1.3 The appointed Planning Inspector then oversaw examination hearings in August and September 2025, before a post hearings letter was published on 22nd October 2025. Further work was then undertaken before a further post hearings letter was received from the Inspector on 12th February 2026, essentially confirming a need for the Council to identify additional site allocations. Specifically, it was established that additional allocations were needed 'boost' housing land supply and, in turn, the housing requirement, which is the number of homes that the Local Plan commits the Council to delivering over the plan period.
- 1.1.4 Between May and June 2026 the Council then undertook a consultation on documents relating to additional sites that could potentially be allocated through 'main modifications' to the Local Plan (as submitted in 2024). Specifically, the documents were as follows: Assessment of Urban Sites; Green Belt Topic Paper (additional work); Additional Sites for Potential Allocation; Sustainability Appraisal (SA) Report Addendum; Habitats Regulations Assessment (HRA) Addendum; Infrastructure Delivery Plan (IDP) Addendum; Transport Assessment Addendum; Transport Assessment Technical Annex.
- 1.1.5 With regards to the SA Report Addendum published in May 2026, this essentially defined and appraised a series of alternative approaches to boosting supply via additional site allocations ('growth scenarios').
- 1.1.6 A hearing session on additional site allocations was then held on 2nd July 2026, and the Inspector has now recommended a series of main modifications to the Local Plan to make the plan sound.
- 1.1.7 The aim of this SA Report Addendum is essentially to present an appraisal of the proposed main modifications (MMs) and reasonable alternatives (just as the fundamental requirement of the SA Report was to present an appraisal of the draft plan and reasonable alternatives, as discussed above).
- 1.1.8 In turn, the aim is to inform the current consultation which – it is important to be clear – is focused only on MMs. This report does not aim to re-present information from the SA Report (2024) that is of little or no relevance to the current consultation on MMs and, in turn, does not aim to supersede the SA Report.
- 1.1.9 This report is structured as follows:
 - **Section 2** – presents a summary of the proposed main modifications.
 - **Section 3** – considers the question of reasonable alternatives.
 - **Section 4** – presents an appraisal of the proposed main modifications.

2 The proposed main modifications

2.1 Introduction

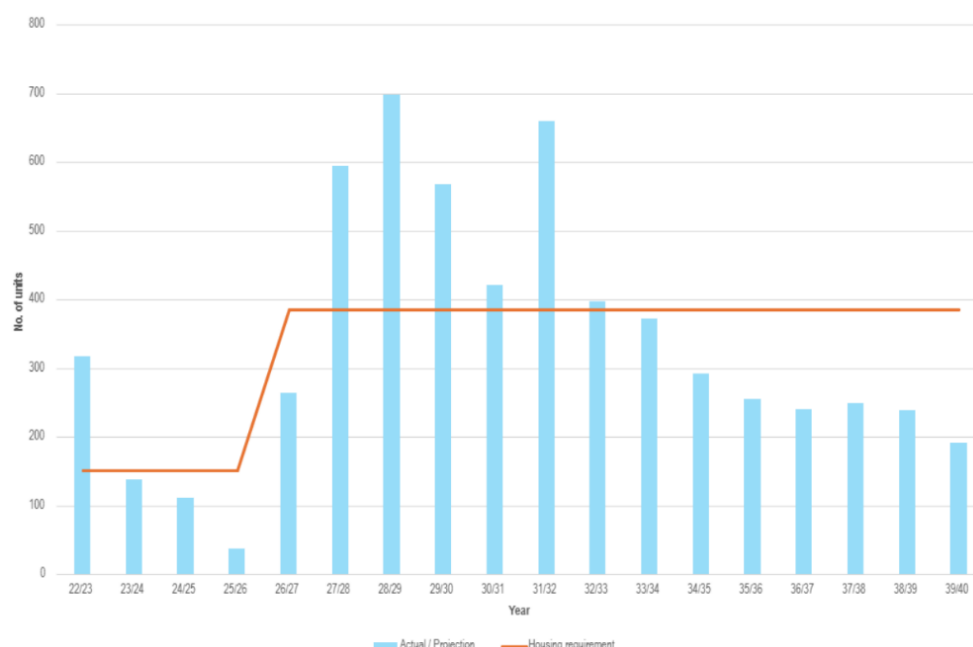
- 2.1.1 There are a total of 183 proposed MMs, but it is important for SA to only focus on those with the potential to generate "**significant effects**", either alone or in combination (also in combination with wider aspects of the submitted plan).

- 2.1.2 Within the SA Report (2024) this understanding that SA must focus only on significant effects translated into a strong focus on the 'spatial strategy', i.e. the suite of proposed site allocations / the identified land supply to deliver on development needs alongside wider plan objectives over the plan period.
- 2.1.3 In turn, it is clearly the case that appraisal work at the current time must focus on proposed changes to the spatial strategy, which are significant. These are introduced below. However, there are also a range of wider proposed modifications that are potentially significant, which are also introduced below.

2.2 Changes to the spatial strategy

- 2.2.1 The proposal is now that the housing requirement over the plan period (2022/23 to 2039/40) should be set at 6,012 homes, or 334 dwellings per annum (dpa) on average. This compares to a requirement of 4,700 homes in the Submission Local Plan (261 dpa). For context, the housing requirement is the number of homes that the Council commits to delivering,¹ and the current proposal for a housing requirement averaging 334 dpa contrasts to a local housing need (LHN) figure of 569 dpa (as understood from the Government's standard method), such that the proposal is to set the housing requirement at 59% of LHN.²
- 2.2.2 More specifically, the new proposal is for a 'stepped' housing requirement as follows:
- Years 1 to 4 (2022/23-2025/26) – 152 homes per annum
 - Years 5 to 18 (2026/27-2039/40) – 386 homes per annum
- 2.2.3 The figure below shows the proposed stepped requirement alongside the proposed housing supply, with the two key points to note as follows: 1) total supply over the plan period 6,052 homes, i.e. such that supply meets (and marginally exceeds) the housing requirement; and 2) the supply is significantly above the housing requirement over the early years of the plan period post adoption, which leads to confidence that the Council will be able to deliver on the housing requirement in practice given the risk of unforeseen delivery issues. More specifically, the supply 'headroom' over the early years of the plan period provides confidence that the Council will be able to maintain a five year housing land supply.

Figure 2.1: The proposed housing land supply and stepped housing requirement

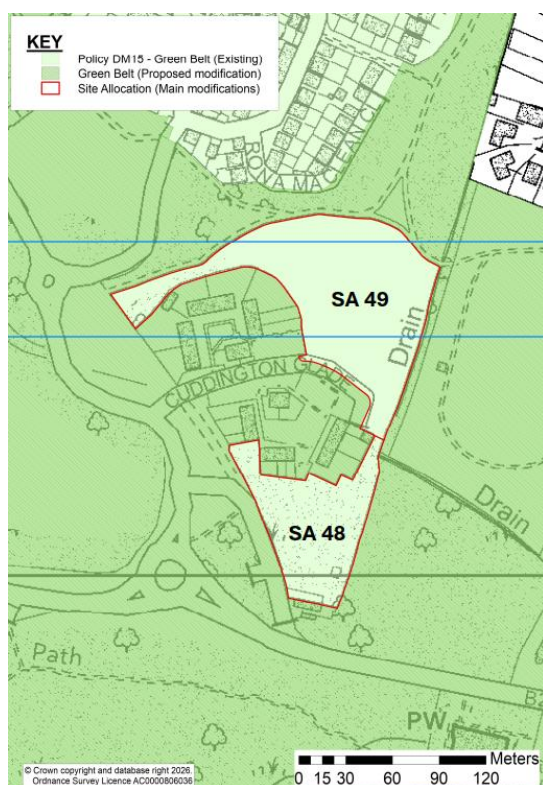


¹ Delivery against the requirement is evaluated in two ways, namely reporting of performance in terms of: 1) the Housing Delivery Test; and 2) demonstration of a five year housing land supply.

² LHN is taken from the 2023 standard method because the plan is being examined under 'transitional arrangements' (see paragraph 234(b) of the NPPF published in December 2024). Were the plan not being examined under transitional arrangements then there would be a need to account for the 2024 standard method which is significantly higher.

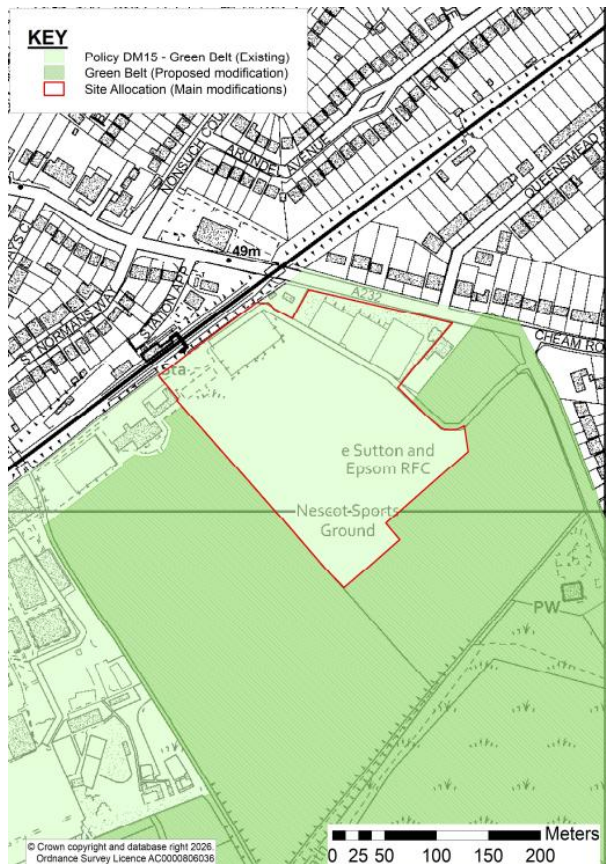
- 2.2.4 The new higher housing requirement is a reflection of the proposal to allocate a series of new housing sites, namely: A) 12 new urban allocations added (SA36-47), which will collectively deliver 188 homes; and B) 4 new Green Belt allocations (SA48-SA51), which will collectively deliver 937 homes. Focusing on Green Belt allocations, this means that in total the proposal now is to allocate nine Green Belt sites for a total of 2,497 homes, in comparison to five sites for 1,502 homes at submission.
- 2.2.5 The 16 new proposed allocations align with those proposed within the 'Additional Sites for Potential Allocation' document (ref. [COUD 29](#)) that was consulted upon in May-June 2026 with one exception. Specifically, Site COL017 (Land West of Burgh Heath Road) was identified as a potential allocation for 50 homes in May-June 2026, but it is *not* a proposed allocation at the current main modifications stage. The site that performs relatively poorly in accessibility terms, and is associated with a relatively sensitive part of the urban edge in landscape terms given rising land and the proximity of Epsom Downs.
- 2.2.6 Focusing on the four new proposed Green Belt allocations, these are:³
- SA48 (Cuddington Glade; 37 homes) & SA49 (Land off Cuddington Glade; 50 homes) – two adjacent sites to the west of the main urban area, north of the B280 Christ Church Road (see Figure 2.1).
 - SA50 (Land at Priest Hill; 275 homes) – located to the east of the main urban area, and specifically located adjacent to the east of Ewell East station (see Figure 2.2).
 - SA51 (Downs Farm; 530 homes) – located to the south east of the main urban area, and specifically to the north of the A2022 College Road and to the west of the A240 Reigate Road. The allocation additionally includes an area of land to the south of College Road proposed for open space.
- 2.2.7 A site specific policy has been prepared for all 16 of the new proposed allocations, plus there are a range of adjustments proposed to site-specific policies that relate to allocations in the Submission Local Plan.
- 2.2.8 The above discussion covers the primary proposed changes made in respect of spatial strategy. Final points to note are then: 1) modest adjustments to the capacity for several sites;⁴ 2) deletion of two allocations that are now under construction; and 3) new text to confirm the employment land need figure to be provided for and how this will be delivered (no substantive changes to the strategy).

Figure 2.1: Proposed allocations SA48 and SA49



³ Previously the reference numbers for these sites reflected the Land Availability Assessment (LAA) as follows: HOR001 (Cuddington Glade); HOR004 (Land off Cuddington Glade); NON013 (Land at Priest Hill); NON016 (Downs Farm).

⁴ Most significantly, the proposal is to increase the capacity at SA32 (Land at West Park Hospital (North)) from 150 to 180 homes. The other six proposed changes to site capacities are very minor, involving a capacity increase of at most 5 homes.

Figure 2.2: Proposed allocation SA50**Figure 2.3: Proposed allocation SA51**

2.3 Other proposed modifications

2.3.1 Other proposed changes are of relatively limited significance, but the following bullet points aim to provide an overview. Policy references reflect the latest situation (noting some renumbering and/or renaming) and policies / proposed changes are discussed in a broad descending order of significance:

- Policy S6 (Affordable Housing) – the proposal is now to specify that Green Belt sites should deliver 50% affordable housing in line with national policy. The Submission Local Plan had simply stated that all greenfield sites should deliver 40% (which remains the requirement for non-Green Belt greenfield sites).
- Policy S8 (Gypsies, Travellers and Travelling Showpeople) – the proposal is to remove the requirement to deliver a minimum of 3 pitches/plots on windfall (i.e. unallocated) sites involving 200+ homes.
- Policy DM8 (Epsom Downs Racecourse and the Racehorse Training Industry) – there are a range of proposed changes in line with a Statement of Common Ground signed by the Council and Jockey Club Racecourses (February 2026), but overall there are limited implications for sustainability objectives beyond those that relate to the ongoing operation of Epsom Downs Racecourse and the associated racehorse training industry. There are also a range of proposed changes to designations covering the Racecourse, as shown on the Policies Map (see discussion below).
- Policy S11 (Design and Heritage) – substantially re-written to align and avoid repeating national policy and to ensure a focus on locally specific issues and opportunities. Density requirements are unchanged.
- DM15 (Green Belt) – substantially re-written to align and avoid repeating national policy and to ensure a focus on locally specific issues and opportunities.
- DM25 (Biodiversity Net Gain) – now proposed to be a DM policy rather than a strategic policy. The policy is largely rewritten but implications are limited. Reference is kept to the 'higher requirement' specified in some site allocation policies (this is 20% for Green Belt allocations) and the policy now also makes reference to "or on unallocated sites that lie outside the urban area..."
- DM19 (Open Spaces, Outdoor Sport and Recreation & DM20: Social Infrastructure and Community Facilities) – these policies have been amended to ensure a clearer distinction between DM19 & DM20. Previously they overlapped. The policies have been strengthened with the aim of maximising community benefit through measures such as community use agreements.
- Policy S9 (Economic Development) – there are extensive proposed changes but the policy intent remains broadly unchanged. Changes are considered to be of limited significance.
- S16 (Flood Risk and Sustainable Drainage) – largely rewritten but implications are limited. There is now reference to the sustainable drainage hierarchy, in line with standard practice.
- Policy S2 (Viable Development) – this policy is proposed to be renamed and the policy has been re-ordered and some adjustments made but there are no substantive changes of significance.
- DM24 (Amenity Protection) – now proposed to be a DM policy rather than a strategic policy.
- Monitoring framework – there are a number of proposed adjustments.

2.3.2 Also, the following two policies from the Submission Local Plan are proposed to be deleted:

- S13 (Preserving identity of place with heritage), as previously presented in the Submission Local Plan. This is because policy is adequately set out in Policy S11.
- DM21 (Education Infrastructure) - deleted as now adequately addressed by policy DM20.

2.3.3 Finally, with regards to proposed changes to the Policies Map, these broadly involve:

- Site allocations – all of the proposed changes introduced above are now reflected.
- Epsom Downs Racecourse – the designated racecourse area is now reduced in extent.
- Racecourse Training Zones – a number of adjustments including deletion of outlying areas.
- Racehorse movement corridors – are now defined.
- Sites of Nature Conservation Importance– a new SNCI is defined and one boundary is adjusted.⁵

⁵ These are sites designated as locally significant for nature conservation. They are typically referred to as Local Wildlife Sites.

2.4 Conclusion

- 2.4.1 This section has sought to introduce the proposed modifications and undertake a 'screening' process to determine those aspects that should be a focus of the appraisal in Section 4 with a view to ensuring a focus on significant effects, and in the knowledge that there is no requirement to appraise each and every proposed modification in isolation (rather, the focus must be on appraising the proposed modifications as a whole, just as the focus in the SA Report was on appraising the plan as a whole).
- 2.4.2 The conclusion is that a focus of appraisal should be on proposed changes to housing land supply (and consequential changes to the housing requirement), as per the approach in the SA Report. Proposed changes to site-specific and thematic policies should be a focus of the appraisal in Section 4, although it is reasonable for this to be 'targeted', specifically with discretion applied in respect of which are discussed and where within the appraisal (i.e. there is no need to appraise every proposed change under every element of the SA framework).

3 Reasonable alternatives

- 3.1.1 In light of the discussion above, there is a need to make a decision regarding whether or not there is a need to formally define, appraise and consult on reasonable alternatives (RAs) at the current time.
- 3.1.2 By way of context, over the course of the SA process to date (an Interim SA Report, the SA Report and the recent SA Report Addendum) the focus has been on RAs in the form of 'growth scenarios', which are defined as alternative approaches to land supply in order to provide for development needs alongside wider plan objectives (or, in short, alternative key diagrams). This was with a view to focusing on RAs likely to generate meaningfully different significant effects and, indeed, which go to the heart of the plan.
- 3.1.3 In turn, a key question is whether there are any RA 'growth scenarios' at the current time, in light of latest evidence and understanding. Key considerations are as follows:
- New proposed allocations – attention focuses on the four new proposed Green Belt allocations, but all of these sites have been explored in detail over the course of the SA process to date and were discussed in detail at the examination hearing session in July 2026. Subsequently the Inspector has not given any indication that any of the new proposed allocations warrant particular ongoing scrutiny, and all are appraised within Section 4, i.e. as part of the appraisal of the proposed modifications as a whole.
 - Omission sites – four omission sites featured in the RA growth scenarios defined, appraised and consulted upon earlier this year,⁶ and then a fifth omission site of note is aforementioned COL017 (Land West of Burgh Heath Road) which was previously identified as a potential allocation but is now an omission site. The key strategic context that previously informed the view there is a reasonable need to explore higher growth scenarios involving omission sites remains unchanged, namely that the Local Plan is set to generate significant unmet housing need that risks staying unmet. However, there has now been ample opportunity to consider higher growth scenarios, such that the current proposed housing land supply and housing requirement is considered to be firmly justified. The Inspector has not given any indication that there remains a need to give ongoing consideration to higher growth scenarios, and it is difficult to suggest that any of the omission sites in question stand out as marginal (i.e. as having a particular case for allocation). With regards to COL017, this was considered in detail at the examination hearings leading to a decision that it is not suitable for allocation. The other site of particular note is then HOR007 (Noble Park), in that this was tentatively identified in the May 2026 SA Report Addendum as sequentially preferable to the remaining three omission sites (in particular due to generating relatively limited concerns in terms of Green Belt impacts). However, HOR007 is associated with a number of constraints and challenges, particularly in terms of biodiversity, as shown through the appraisal of RA growth scenarios presented in the May 2026 SA Report Addendum.
- 3.1.4 In conclusion, there are no reasonable alternatives for appraisal and consultation at the current time.

⁶ See Table 5.4 within the SA Report Addendum published in May 2026. Specifically, the four omission sites were HOR007 (Noble Park), which featured in Growth Scenarios 5 and 6, and then three sites that featured only in Growth Scenario 6 (the highest growth scenario), namely HOR002 (Hollywood Lodge), COL019 (Land east of Burgh Heath Road) and COL023 (Land near Downs Road east).

4 Appraisal of proposed main modifications

4.1 Introduction

- 4.1.1 The primary aim of this section is to present an appraisal of the proposed MMs, as introduced above, under the SA Framework (see Section 3 of the SA Report), at the core of which is a list of 13 topics.
- 4.1.2 The aim is not to discuss every MM systematically under each element of the SA framework, but rather to present a targeted appraisal guided by the discussion in Section 2.
- 4.1.3 A secondary aim is then to consider the 'cumulative' effect of the proposed MMs in combination with those aspects of the Submission Plan not proposed to be modified and, in doing so, update the conclusions on the Submission Plan reached within the SA Report (2024).

4.2 Accessibility (to community infrastructure)

- 4.2.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

"In conclusion, the Local Plan as a whole is predicted to result in a 'moderate or uncertain' positive effect on the baseline (accounting for established objectives)... There is a case for predicting significant positive effects recognising that the baseline situation is one whereby growth comes forward in a more piecemeal and ultimately sub-optimal way giving rise to issues and opportunities missed. However, on the other hand, the community infrastructure opportunities set to be realised through the plan are of somewhat limited significance (although there remains flexibility to consider delivery of a new school at Horton Farm, should this be required)."

- 4.2.2 Beginning with the 12 new proposed urban allocations, these are broadly supported in that there is support for growth in the urban area from an accessibility perspective. Also, several are proposed to be mixed use, albeit in part to avoid or mitigate loss of existing commercial / community / leisure floorspace. Further considerations are: A) proposed site specific policies for several of the sites potentially indicate a degree of opportunity in terms of improved permeability / connectivity through the urban area; and B) at one site there is a requirement as follows: *"Retain active ground floor retail frontages along the parts of the site that... form part of the Primary Shopping Area for the Town Centre."*
- 4.2.3 With regards to the two smaller proposed Green Belt allocations to the west of the urban area, these were discussed as follows in the previous SA Report Addendum (May2026): *"...unlikely to deliver anything of significance in terms of new or upgraded community infrastructure, but this is a reasonably accessible location in relative proximity to the town centre, and it appears that neither site performs a significant role in terms of providing accessible or amenity greenspace."* The sites are close to the B280 and around 1.5km from the town centre, and they also benefit from good access to Epsom Common and Horton Country Park. Focusing on the northern-most of the two sites, the proposed site specific policy in respect of access is of note: *"Provide safe and appropriate: i) vehicle, pedestrian and cycle access to the site from Cuddington Glade that does not result in the loss of any existing parking provision to serve the established residential dwellings that adjoin the site; ii) pedestrian and cycle access to the site from the established footpath bordering the site to the north."*
- 4.2.4 With regards to Land at Priest Hill, the site is highly accessible and well-connected given its location adjacent to Ewell East Station, and furthermore there are a range of important site specific requirements that are supported from an accessibility perspective, including a requirement to provide a new 'community hub' to include a medical facility in line with the following requirement: *"Provide additional primary care capacity required to serve local needs. This could take the form of on-site provision integrated into a community building which accommodates primary health care provision alongside community health and wellbeing services required to meet the area's needs, or an equivalent financial contribution towards off-site provision of new or improvement to existing health facilities. The form of required additional primary care provision will be determined in consultation with the NHS at the time the site comes forward."*

- 4.2.5 Sports pitches are to be retained outside of the site boundary, and there is a notable requirement to: *“Establish a legal mechanism for long term management of green and blue infrastructure and children’s play space on the site, providing access for recreational purposes by the general public as well as residents of the development.”* Also, there is a requirement for a “landscaped station square”.
- 4.2.6 Finally, with regards to Downs Farm, this is a less accessible location relative to the Green Belt sites discussed above, but still reasonably located in terms of accessing the town centre and a rail station. Importantly, as a larger site there is good potential to require targeted new or upgraded community infrastructure alongside new homes, and site specific policy notably requires:
- Delivery of an employment hub (this is set out as a headline requirement for the site but is not elaborated on within the site specific policy).
 - *“Establish a legal mechanism to secure frequent bus services to serve the site in the long term and provide supporting infrastructure including bus priority measures where feasible.”*
 - *“Provision of a new specialist school of up to 2.5ha on the site.”*
 - *“Provide additional primary care capacity required to serve local needs [with the rest of the policy requirement taking the same form as that discussed above for Land at Priests Hill].”*
 - *“Provide permeability through the site for pedestrians and cyclists to provide connectivity between adjoining residential areas and the open space at land to the South of College Road...”*
 - *“Provide offsite highway improvements along Reigate Road and College Road to improve pedestrian and cycle infrastructure with a focus on improving safety and improving crossing opportunities.”*
 - *“Provide financial contributions towards improvements at Epsom Downs Station.”*
- 4.2.7 There are no policy requirements regarding the extent or spatial configuration of onsite green infrastructure / open space / play space in respect of the part of the site to the north of College Road (i.e. the part of the site that will deliver new homes). However, with regards to the proposed open space to the south of College Road, the requirements are as follows:
- *“Provide public open space incorporating walking and cycling routes providing connections between College Road, Longdown Lane South and Epsom Downs Station.”*
 - *“Provide playing pitches and new supporting infrastructure including changing facilities that are served by utilities and car parking for users.”*
- 4.2.8 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the positive appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs. It remains the case that the plan performs well in terms of directing growth in line with accessibility objectives including by supporting sites that can deliver targeted new or upgraded community infrastructure.

4.3 Air quality

- 4.3.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):
- “In conclusion, the Local Plan as a whole is predicted to result in a **neutral effect** on the baseline (which is broadly one of improving air quality, reflecting the move to electric vehicles, albeit particulate pollution from EVs will remain an issue). The distribution of growth does not give rise to any significant concerns, and a more significant consideration is potentially in relation to the total quantum of growth that is supported. On the one hand, as a more heavily urbanised part of Surrey there are some relative air quality issues within the Borough. However, on the other hand, there is relatively low car dependency and providing for unmet housing need distant from source can lead to problematic travel patterns. Also, some towns in wider Surrey are subject to significant air quality constraint. With regards to DM policies, there is a need for an ongoing focus on ensuring that growth-related opportunities to deliver improvements to sustainable transport infrastructure (also bus services) are realised.”*

- 4.3.2 None of the new proposed allocations are thought to give rise to a significant concern in terms of significantly impacting local air quality either alone or in combination. Land at Priest Hill was discussed in the SA Report as being 670m from Ewell AQMA but this AQMA was recently revoked. In any case, the site is located adjacent to Ewell East railway station, and will likely deliver modest onsite retail, such there should be the potential to achieve a degree of modal shift away from reliance on the private car.
- 4.3.3 Finally, it is noted that at two of the new proposed allocations there is a requirement as follows: *“Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the A24 and neighbouring uses.”*
- 4.3.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the neutral appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

4.4 Biodiversity

- 4.4.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“In conclusion, the Local Plan as a whole is predicted to result in a **neutral effect** on the baseline. The proposal is to focus Green Belt allocations to the west of the urban area, where there is biodiversity sensitivity... however, most of the sites are relatively unconstrained, site-specific opportunities can be identified and the proposal is to require 20% BNG for three of the five sites. The other key consideration is growth quantum, in that unmet housing need could lead to increased pressure for growth in elsewhere in Surrey, where there is quite extensive biodiversity constraint, including internationally designated sites.”*

- 4.4.2 With regards to proposed changes to the spatial strategy, the previous SA Report Addendum (May 2026) found the proposed approach (as amended) to perform well, with key considerations including:

- None of the new proposed urban sites are known to be subject to significant constraint.
- The two sites to the west have limited constraint, although the northern site is partly constrained by Tree Protection Orders (TPOs) and, in this regard, it is important to note that the current assumed capacity of 50 homes is at the upper end of the capacity range established through the LAA.
- Land at Priest Hill is overall considered to be subject to limited biodiversity constraint. The SA Report (2024) explained: *“Land adj. Ewell East Station 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 may wish to comment through the consultation).”* However, it is noted that the nature reserve was previously playing fields, as discussed [here](#).
- Finally, with regards to Downs Farm, whilst this is a larger site it is subject to limited constraint, and the potential to deliver targeted onsite biodiversity gains can be envisaged. The SA Report (2024) discussed the strategic importance of the southern part of the main allocation site. Also, over the course of the SA process there has been discussion of a risk that land to the south of College Road could come under pressure for development, but it is now clear that the proposal is to retain this land as open space.

- 4.4.3 With regards to site specific policies for the new proposed allocations:

- Urban sites – TPOs are referenced within policies for two of the sites, and at two other sites there is a requirement to: *“Ensure the site layout maximises retention and safeguarding of mature trees, incorporating these in a coherent landscaping strategy for the site.”*
- Adjacent Green Belt sites to the west – at both sites there is a requirement as follows: *“Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees both within and beyond the site boundary, incorporating these in a coherent landscaping strategy for the site.”*
- Land at Priests Hill – there are no site specific requirements beyond the standard requirement for Green Belt sites to: *“Achieve a measurable biodiversity net gain of at least 20%...”*
- Downs Farm – there is a requirement to: *“Ensure the site layout maximises retention and safeguarding of trees covered by Tree Preservation Orders and other existing trees, incorporating these in a coherent landscaping strategy for the site.”*

- 4.4.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the neutral appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

4.5 Climate change adaptation

- 4.5.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“In conclusion, the Local Plan as a whole is predicted to result in a **neutral effect** on the baseline. Focusing on flood risk, few concerns were raised through the consultation in 2023, and since that time detailed work has been undertaken through a Strategic Flood Risk Assessment (SFRA). Overheating risk is another important climate change adaptation / resilience consideration (as understood from the EEBC Climate Change Study, 2023) and, in this regard, there is a degree of support for the ‘balanced’ nature of the proposed spatial strategy; specifically, the proposal to avoid undue high-density development...”*

- 4.5.2 None of the new proposed allocations are subject to significant flood risk. There is a degree of surface water flood risk around the edge of Downs Farm, but there is little reason to suggest that this would act as a significant hinderance to safe access or otherwise hinder effective masterplanning, nor is it possible to suggest any significant risk of increased surface water runoff leading to significant downstream flood risk. With regards to urban allocation options, there can sometimes be a tension between urban intensification objectives and flood risk objectives, but there is often good potential to avoid and mitigate risk including through site design. The current list of 12 sites was whittled down from an original shortlist of 13 on flood risk grounds, as discussed in Section 5.3 of the previous SA Report Addendum (May 2023).
- 4.5.3 With regards to site-specific policies for the new proposed allocations, the key point to note is the following requirement for any sites affected by surface water flood risk: *“Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.”*
- 4.5.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the neutral appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

4.6 Climate change mitigation

N.B. the focus here is on built environment decarbonisation with transport discussed subsequently.

- 4.6.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“In conclusion, having taken account of stringent / good proactive proposed DM policy, the Local Plan as a whole is predicted to result in a **neutral effect** on the baseline. This is a departure from the conclusion reached in respect of Growth Scenario 5 in Section 6 and reflects the requirement for net zero development (to an exacting standard, i.e. onsite and otherwise in-line with the energy hierarchy, and with application of an energy-based method for the purposes of calculating and communicating performance).”*

- 4.6.2 In short, the appraisal concluded a neutral effect for the plan as a whole despite having concluded a ‘moderate or uncertain’ negative effect for the spatial strategy / site allocations aspect of the plan, after having taken into account the proposal for quite stringent development management policy.
- 4.6.3 With regards to the new proposed Green Belt allocations, there is no reason to suggest that any are associated with a particular built environment decarbonisation opportunity. However, all are fairly uncomplicated greenfield sites such that there is no reason to suggest that there would be abnormal development costs that would affect the potential to viably deliver net zero carbon development.
- 4.6.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the neutral appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs. There is a clear case for taking a proactive approach to growth in a Borough where there is strong development viability and therefore good potential to deliver net zero carbon developments.

4.7 Communities and health

N.B. the aim of the discussion is to build upon (rather than repeat) the discussion under 'Accessibility'.

- 4.7.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

"In conclusion, the plan has been iterated over a number of years and in light of extensive consultation. There remain community concerns with the proposed approach to growth at a number of locations, such that there is a 'communities' case to be made for lower growth, but any such approach would also lead to a risk to progressing the plan to adoption, and a priority is undoubtedly adopting a Local Plan in good time so as to avoid further sites coming forward under the presumption in favour of sustainable development (including 'planning by appeal'). Community concerns with growth are also allayed on account of the proposed suite of DM policies, both site-specific and borough-wide, and there is confidence in respect of Whole Plan Viability (and, in turn, confidence that the site allocations can deliver in a way that aligns with policy). Overall a 'moderate or uncertain positive effect on the baseline is predicted."

- 4.7.2 It is also acknowledged that there are local community concerns in respect of certain and potentially all of the new proposed Green Belt allocations. This is perhaps most notably the case for Downs Farm, given its scale and because it is located within the Green Belt gap between Epsom and Banstead / Nork. However, there is also a need to account for the community benefits of an up-to-date Local Plan, as opposed to a baseline situation where development may come forward without an up-to-date Local Plan.

- 4.7.3 Finally, the following bullet points cover proposed changes to site-specific policies for submission allocations, all of which are considered to be beneficial in terms of communities-related objectives:

- For the two largest submission urban allocations there is new proposed policy text specifying that: A) access should be *"designed to minimise potential conflict between car users, pedestrians and cyclists"*; and B) development should include *"mixed use ground floor active frontages providing Commercial, Business and Service floorspace to provide natural surveillance of the public realm."*
- At 10 submission urban allocations there is added detail regarding access requirements, for example: *"Provide safe and appropriate vehicle, pedestrian and cycle access to the site from East Street..."*
- New policy text is added in respect of car parking for several of the submission urban allocations. In three cases the new requirement is: *"Consider the findings of the Councils car parking study and its recommendations in relation to public car parking provision at the site."*
- At three submission urban allocations there is a new requirement as follows: *"Consider the site's prominent location for a high-quality designed landmark building."*
- At one of the submission urban allocations there is a new requirement as follows: *"Maximise linkages with the town centre by integrating cross site movement routes for pedestrians and cyclists."*
- At one of the submission urban allocations there is a new requirement for a landscape strategy that *"frames and provides intervisibility of Dullshott Green as a public space."*
- For many sites there is a new proposed requirement to ensure that site allocations involve *"sensitive design incorporating positive elements of local character and appearance."*
- At one submission urban allocation there is a new requirement to: *"Design the scheme to ensure the amenity impacts on future occupiers from adjacent non-residential uses is adequately addressed."*
- At one submission urban allocation for extra care accommodation there is a new proposed requirement to: *"Facilitate access to public transport including bus or other public transport services including facilities that encourage public transport use."*
- At one proposed urban allocation (Epsom Hospital), there is a new requirement as follows: *"Provide offsite highway improvements: i) along Woodcote Green Road to improve safety and public transport infrastructure ii) along Dorking Road to improve public transport infrastructure."*
- At three of the submission Green Belt allocations there is a new requirement as follows *"Establish a legal mechanism to secure or enhance service frequency of bus services operating in the vicinity of the site to ensure connectivity to the wider area."*

- At one of the submission Green Belt allocations there is a new requirement to: *“Provide off site improvements to Chantilly Way to improve connectivity from the site to adjacent site allocation SA35 to improve access to bus services.”*
- At one of the submission Green Belt allocations there is a new requirement to: *“Facilitate access to public transport including bus services operating within the vicinity of the site...”*
- At Horton Farm (the largest of the submission Green Belt allocations) there is a new requirement to ensure pedestrian and cycle connectivity to Horton Centre.

4.7.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the positive appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs. Whilst there is a case for lower growth, as discussed in the previous SA Report Addendum, there is also a need to factor in that the Local Plan could risk being found unsound such that there is a risk of ongoing development pressure from ad hoc planning applications under the presumption in favour of sustainable development.

4.8 Economy and employment

4.8.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

“In conclusion, a ‘moderate or uncertain positive effect on the baseline is predicted, including given that through protection and enhancement of existing employment areas the Local Plan will ensure an employment land supply in line with the needs set out in the HEDNA (2023). However, there is a degree of uncertainty on account of the scale of unmet housing need, recognising the importance of delivering housing for the local economy, including family and affordable housing.”

4.8.2 Firstly, it is noted that some of the new proposed urban allocations are proposed to be mixed use, albeit in part to avoid or mitigate the commercial / community / leisure floorspace currently on site.

4.8.3 With regards to the new proposed Green Belt sites, the key point to note is that Downs Farm includes existing farm buildings used for offices as well as a warehousing and distribution business. However, the proposal is to deliver an onsite ‘employment hub’ which serves to mitigate any concerns.

4.8.4 Final considerations are: A) there is clear support for boosting housing supply / reducing the gap between the housing requirement and LHN, because providing for housing needs supports the local economy; B) with regards to wider proposed modifications, there is support for the new wording clarifying the need / supply position although, as discussed in Section 2, there are no substantive implications; and C) there is broad support for the range of proposed changes agreed with the horseracing industry (see Section 2).

4.8.5 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the positive appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

4.9 Historic environment

4.9.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“In conclusion, an overall **neutral effect** is predicted... Historic England did not raise significant concerns through the consultation in 2023, although it is recognised that they may wish to comment on the proposed focus of growth in and around the Hospitals Cluster Conservation Area at the current time.”*

4.9.2 With regards to proposed changes to the spatial strategy:

- Certain of the new proposed urban allocations are known to be subject to a degree of constraint, with at least one including a listed building. However, when redeveloping or otherwise intensifying urban sites there is typically good potential to mitigate impacts or indeed deliver benefits.
- The two proposed smaller Green Belt allocations to the west are subject to limited or low constraint.
- Land at Priest Hill is subject to low constraint.

- Downs Farm is subject to a degree of constraint, with the SA Report (2024) explaining: “[Downs Farm] is adjacent to a conservation area associated with an early C20th housing estate, and land within the site does rise away from the conservation area; however, the proposed greenspace could mitigate any visual impacts. The site promoter has submitted information suggesting that impacts can be suitably avoided and mitigated, but a degree of residual concern remains.”

4.9.3 With regards to site-specific policies for the new proposed allocations:

- At one urban site there is a requirement to: “Ensure the re-use the stained-glass window from the locally listed building located on the site in any future development proposals....”
- At a number of urban sites there is a requirement to: “Conserve or enhance the significance and setting of [a named conservation area] through sensitive design incorporating positive elements of local character and appearance.”
- At one urban site there is a specific requirement as follows: “Retention of the Grade II listed wall that forms part of the site boundary.”
- At several sites there is a requirement to: “Undertake archaeological investigations in accordance with Policy DM13, taking account of the site’s location within an Area of High Archaeological Potential.”
- At Downs Farm the requirement is to: “Conserve or enhance the setting of the Higher Green / Longdown Lane Conservation Area that lies to the north of the site and listed buildings located in close proximity to the site, through sensitive design incorporating positive elements of local character and appearance.”

4.9.4 With regards to proposed changes to site-specific policies for submission allocations:

- At one site there is a new proposed requirement to: “Undertake and submit an appropriate desk-based assessment and written scheme of investigation due to....”
- At one site the previous requirement to conserve and enhance the part of the building that is Grade II listed is now proposed to be replaced by a requirement to ‘retain and convert’.
- At one site there is a new requirement to account for a Grade II listed water tower.
- At one of the submission Green Belt allocations (Chantilly Way) the submission requirement to account for nearby heritage assets is proposed to be deleted. This is not thought to give rise to a concern.

4.9.5 Finally, as discussed above there are a range of proposed changes to Policy S11 (Design and Heritage) but there are not considered to be any significant implications for historic environment objectives.

4.9.6 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the ‘moderate or uncertain’ negative appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs. It remains the case that there are unavoidable tensions with historic environment objectives, albeit there is also a need to acknowledge that the baseline scenario is one whereby growth comes forward without the benefit of up-to-date local plan.

4.10 Homes

4.10.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“In conclusion, there is a clear need to predict a negative effect on the baseline, which is one whereby planning applications would be considered in the context of standard method LHN rather than the much lower proposed housing requirement. However, there are also many clear reasons to adopt the Local Plan, from a housing perspective, including with a view to setting clear policy requirements for housing mix and affordable housing and delivering Horton Farm, which is crucially important in a number of respects but not least given the potential to provide a mix of affordable homes and for Gypsy and Traveller accommodation needs. On balance it is considered appropriate to predict a ‘**moderate or uncertain’ negative effect** for the Local Plan as a whole, but this is marginal, i.e. there is a case for predicting a negative effect given the extent of unmet housing need generated.”*

N.B. the appraisal concluded a ‘moderate or uncertain’ negative effect for the plan as a whole despite having concluded a ‘significant’ negative effect for the spatial strategy / site allocations aspect of the plan.

- 4.10.2 As discussed in Section 2, the proposal now is to significantly boost housing land supply and, in turn, the housing requirement, but the effect would still be that the Local Plan generates significant unmet housing need, and there is little if any confidence that this would be provided for elsewhere in the short or medium term (but in the fullness of time there will be potential for future local plans under Local Government Reorganisation and devolution to explore how best to provide for Surrey's housing needs).
- 4.10.3 Further considerations relate to the specific additional site allocation options:
- Deliverability – the new proposed Green Belt allocations can deliver relatively early in the plan period, which is important as the NPPF sets out that there must be a demonstrable five year housing land supply (as measured against the housing requirement, and with a 'buffer' applied as appropriate) at the point of plan adoption, and it is in the Borough's interest to be confident that a five year land supply can be maintained over the early years of the plan period ahead of a supply boost through a new Local Plan.
 - Viability – all of the greenfield sites are relatively uncomplicated without readily apparent abnormal development costs likely to impact development viability and, in turn, the ability to deliver affordable housing alongside delivering on wider policy asks such as in respect of net zero development.
 - Site-specific proposals – Cuddington Glade is currently the subject of a planning application for a care home, which is considered to be a positive; and the promoters of Land at Priest Hill recently held a pre-application consultation that included a commitment to delivering 50% "family sized housing".
 - Specialist accommodation – the Submission Local Plan proposes that sites with a capacity above 200 homes should deliver specialist accommodation and, in this regard: A) Land at Priest Hill (275 homes) recently held a pre-application consultation and the proposal is not to deliver specialist accommodation, although it should be noted that the scheme does propose to deliver benefits in several other respects (as discussed); and B) Downs Farm is then the largest of the additional allocation option (530 homes) and there could be the potential to work with the site promoters to determine what the scheme should deliver, working within the parameters of viability.
 - Affordable housing – it is important to be clear that virtually all affordable housing in the Borough over recent years and decades has been delivered by market led housing schemes, such that boosting the supply of market led housing schemes is a very proactive step in terms of affordable housing delivery. For example, the largest of the new allocation options – Downs Farm – could likely deliver the full policy quote of affordable housing, such that it alone could deliver more than 100 times the number of affordable homes delivered across the Borough in 2024/25.⁷
- 4.10.4 With regards to wider proposed modifications, the key point to note is the new proposed requirement in respect of 50% affordable housing on Green Belt sites. This aligns with national policy, but is broadly supported and it is understood that this requirement can be viably delivered without any undue knock on implications for the achievement of wider policy objectives. Otherwise, there are no major proposed changes to development management policies with cost / viability implications such that there are no additional concerns around delivery risks (i.e. sites failing to deliver or failing to deliver in line with the anticipated trajectory) or sites coming forward with less than the full policy quota of affordable housing (or with compromises made regarding the affordable housing tenure mix).
- 4.10.5 Finally, the proposal is to amend Policy S8 (Gypsies, Travellers and Travelling Showpeople) by removing the requirement to deliver a minimum of 3 pitches/plots on windfall (i.e. unallocated) sites involving 200+ homes. This gives rise to a degree of tension with objectives relating to providing for Gypsy and Traveller accommodation needs, because there is a need for 18 pitches over the plan period and the proposal is to deliver on 10 pitches at Horton Farm. However, there is the potential for windfall sites to come forward (albeit in a constrained Borough such as Epsom and Ewell windfall site opportunities are limited). Also, there can be little confidence that in practice any windfall sites will come forward for 200+ homes, let alone ones that would be suited to deliver pitches/plots (noting that neither Downs Farm nor Land at Priest Hill is required to deliver pitches/plots), such that removing the requirement adds to clarity regarding supply.

⁷ The HEDNA (2023) identifies a need for 652 affordable homes per annum, which is in stark contrast to recent delivery, as set out across the annual Authority Monitoring Reports, with it notably the case that only two affordable homes were delivered in the Borough in the 2024/25 monitoring year, of a total of 112 homes delivered. This equates to delivering affordable housing at a rate of 1.7%, and the average rate over the period 2019 to 2025 is 10.45% (although it is 25.7% over the period 2007 to 2025). It is important to note that greenfield sites are much better placed to deliver a high proportion of affordable, indeed, it is not uncommon for brownfield sites to deliver no affordable housing on viability grounds.

- 4.10.6 In **conclusion**, the proposed MMs have clear positive implications for the achievement of housing / 'homes' objectives; however, on balance it is still considered appropriate to conclude that the Submission Local Plan plus MMs will lead to a 'moderate or uncertain' negative effect on the baseline.

4.11 Land and soils

- 4.11.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*"In conclusion, a **neutral effect** is predicted, as per the conclusion reached in Section 6. It is important to recall that development would continue under the baseline scenario."*

- 4.11.2 Focusing on agricultural land, Downs Farm is the only new proposed allocation to have recently been in productive agricultural use, and it is likely to comprise best and most versatile agricultural land. The other greenfield new proposed allocations appear to have less agricultural potential, e.g. more suited to grazing horses or, in the case of Land at Priest Hill, sports pitches. <https://pegasuspg.maps.arcgis.com/apps/instant/compare/index.html?appid=ab3ff95403bb437bac864ce538d14603>

- 4.11.3 One further consideration is that there is a 'waste consultation area' associated with a waste transfer site adjacent to Downs Farm (former Epsom Chalk Pit / Lime Works). However, this is a constraint but has been accounted for in site promoter masterplanning.

- 4.11.4 In **conclusion**, the proposed MMs give rise to a degree of tension in terms of the loss of agricultural land, but it remains appropriate to predict a neutral effect in respect of the Submission Local Plan plus MMs.

4.12 Landscape

- 4.12.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*"In conclusion, the plan is predicted to have a **neutral effect** on the baseline, recognising that the baseline is a scenario whereby development continues to come forward. The plan seeks to make best use of previously developed land (working within the parameters of work through the LAA to identify sites that are available) and the proposed Green Belt allocations are overall supported from a landscape perspective (in isolation and in combination, acknowledging that they are clustered in the west of the Borough). There is scope for further site-specific policy, e.g. concept masterplans for key sites, to provide further confidence that they can be successfully brought forward in a timely manner without undue landscape impacts."*

- 4.12.2 With regards to proposed changes to the spatial strategy:

- None of the new proposed urban allocations are known to generate a significant concern in respect of landscape or townscape impacts.
- The two proposed Green Belt allocations to the west are small sites that give rise to limited concerns.
- Land at Priest Hill has limited or low sensitivity.
- Downs Farm has a degree of landscape sensitivity, with the SA Report (2024) explaining: "... the proposal to focus housing in the less sensitive northern part of the site is noted, and it is recognised that the Green Belt Study Update (2024) indicates relatively limited landscape concerns but some concerns regarding topography / elevation where there is some visual sensitivity. However, concerns remain regarding pressure for future development within Green Belt parcel 35, to the south of the site, which would have the effect of closing a key settlement gap, plus this is rising land towards Epsom Downs. This concern was raised in the ISA Report (2023), mindful that the land is in the control of the site promoter, but in response the site promoter argues that this concern is not legitimate."

The latest situation is that concerns are potentially allayed by the clear proposal to maintain 'Green Belt parcel 35' (i.e. land within the site red line boundary to the south of College Road) as open space.

- 4.12.3 With regards to site specific policies, there are a number of new proposed requirements that have already been discussed above that have broadly positive implications in terms of landscape objectives.

- 4.12.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the

neutral appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

4.13 Transport

- 4.13.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

“In conclusion, it is appropriate to predict a ‘moderate or uncertain’ positive effect.... Consideration should be given to integrating the findings of the LCWIP within site specific policies, with a view to realising growth-related opportunities as fully as possible.”

- 4.13.2 With regards to proposed changes to the spatial strategy:

- None of the new proposed urban allocations are known to generate a significant concern, either in isolation or in combination (including noting site-specific policy relating to car parking).
- The two proposed Green Belt allocations to the west are small sites that give rise to limited concerns, and they are considered to be quite well located, as discussed above under ‘accessibility’.
- There is a clear transport case to be made for supporting Land at Priest Hill.
- Downs Farm is more challenging as a larger site, with the SA Report (2024) having stated: “[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 options and frequency are not as good as from Epsom (in particular) and Ewell East).” The SA Report Addendum published in May 2026 further elaborated by explaining: A) the [connectivity score](#) within the centre of the site is quite low (42), but it is higher at the edge of the site adjacent to A-roads and there are opportunities to deliver transport upgrades (as discussed); and B) Downs Farm is a less accessible location within the Borough, but still in proximity to a train station, and transport opportunities have been highlighted through recent IDP work.

- 4.13.3 With regards to site specific policies, there are a number of new proposed requirements that have already been discussed above that have broadly positive implications in terms of transport objectives. Focusing on Downs Farm, there is support for requirements relating to: A) safe access; B) frequent bus services to serve the site; C) permeability through the site; D) targeted offsite enhancements along the both of the adjacent A-road corridors; and E) financial contributions to enhancement of Epsom Downs Station.

- 4.13.4 Finally, a key consideration throughout the SA process has been the need to minimise unmet housing need, as far as possible, because unmet need creates challenges for strategic transport planning, and can result in problematic commuting patterns.

- 4.13.5 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the positive appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

4.14 Water

- 4.14.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“In conclusion, and in line with Section 6, broadly **neutral effects** are predicted. It will be important to take account of consultation responses received from the Environment Agency and the water companies.”*

- 4.14.2 Focusing on the capacity of sewage treatment works, the SA Report (2024) concluded no major concerns under any of the growth scenarios appraised at that time, and explained that Thames Water had provided the following statement when consulted on the Infrastructure Delivery Plan (IDP):

“With regard to Hogsmill STW, no growth upgrades are proposed in AMP8 (from 2025-2030) and while growth is anticipated within the catchment there is not enough growth concentrated within the catchment to require a growth upgrade during AMP8. The proposed growth within Epsom and Ewell and other authorities within the catchment of Hogsmill STW will inform our projections for flows to the works and when growth upgrades may be required. A project is proposed in AMP8 to quadruple storm tank capacity by 2031. This will reduce spills from the STW and would also reduce the effect of new development on discharges from the works. In addition an upgrade is also proposed to the combined heat and power plant at the site.

Our adopted Drainage and Wastewater Management Plan can be found [here](#) and includes consideration of what actions will be necessary within the Hogsmill catchment over the next 25 years. Growth projected within the borough through the local plan will be taken into account in forecasts to help inform future updates to our DWMP and inform future business plan proposals. Future forecasts will take account of a range of data and information as it is people that use water and produce wastewater and not new buildings, as such forecasts need to take account of factors including local plan figures for housing delivery along with anticipated population growth and observed flows at existing works.”

- 4.14.3 This quote serves to highlight the importance of providing water companies with early certainty regarding the scale and location of growth in any given area to inform long-term planning for sewage treatment. Also, this is similarly the case with long term planning for water supply, which is an issue in several parts of the country at the time of writing, although not thought to be an issue affecting Epsom and Ewell.
- 4.14.4 The Regulation 19 representation received from the Environment Agency did not raise any significant concerns and this was similarly the case for in respect of the representation received from Thames Water (a RAG assessment was provided that considered each of the proposed allocations in turn).
- 4.14.5 The latest situation is then set out in the updated IDP (2026) as follows:
“Thames water provided the following on the 19 March - “In relation to increasing the housing requirements in the local plan to 5,700 homes we are aware of capacity constraints at the STW serving the area. Further assessment is progressing with a view to delivering any upgrade when required during the local plan period taking account of the growth within Epsom and Ewell and other local authorities within the same catchments. However, we do not envisage a significant issue with supporting the increased levels of growth.”
- 4.14.6 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the neutral appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

4.15 Overall conclusion

- 4.15.1 The appraisal finds that none of the proposed modifications generate significant effects, either alone or in combination. However, the proposed modifications do have positive implications for the achievement of sustainability objectives relating to meeting housing needs. The most significant aspect of the proposed modifications is the proposal to allocate four new Green Belt sites for a total of 937 homes and, in particular, a focus of the appraisal is the proposal to allocate Downs Farm, to the east of Epsom, for 530 homes. There are inevitably challenges associated with this site given its scale, current use (recent use for agriculture) and location, but as well as making a significant contribution to housing needs it can deliver benefits including affordable housing, land for a school, transport upgrades and large scale open space / sports pitches.
- 4.15.2 Finally, with regards to monitoring, there are extensive proposed modifications to the monitoring framework, although many of these relate to monitoring whether each of the proposed allocations delivers as anticipated. The suggestions presented in Section 11 of the SA Report (2024) still broadly hold true. Of note is the suggestion to ensure a focus on monitoring matters relating to Gypsy and Traveller accommodation needs, given a risk of there being unmet needs, and with a view to informing future needs assessments. Also, there could be merit in monitoring delivery of net zero developments (Policy DM10).

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Epsom and Ewell Local Plan

Habitats Regulations Assessment of the Main Modifications

September 2026



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY



Epsom and Ewell Local Plan Proposed Main Modifications

Habitats Regulations Assessment of the Main Modifications

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Front Cover: Mole Gap to Reigate Escarpment SAC, Box Hill

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Client comments can be sent to Lepus using the following address.

Eagle Tower,
Montpellier Drive
Cheltenham
Gloucestershire
GL50 1TA
Telephone: 01242 525222
E-mail: enquiries@lepusconsulting.com
www.lepusconsulting.com

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Acronyms and abbreviations

AA	Appropriate Assessment
BNG	Biodiversity Net Gain
EiP	Examination in Public
HRA	Habitats Regulations Assessment
LAA	Land Availability Assessment
LSEs	Likely Significant Effects
MM	Main Modification
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SAC	Special Area of Conservation
SPA	Special Protection Area

1 Introduction

1.1 Context

- 1.1.1 Epsom and Ewell Borough Council (the Council) submitted its Local Plan¹ to the Secretary of State for public examination on 10 March 2025. Lepus Consulting prepared a Final Habitats Regulations Assessment (HRA) in support of the Submission Local Plan in February 2025².
- 1.1.2 During the Local Plan Examination in Public (EiP) hearings in October 2025, the Inspector raised concerns regarding the proposed quantum of development to be delivered by the Local Plan, and the robustness of some components within the supporting evidence base.
- 1.1.3 In response, the Council committed to undertake two discrete pieces of additional evidence work: (1) a review of sites discounted within the Land Availability Assessment (LAA), including the reassessment of sites previously excluded at Stage 2 on the basis of availability; and, (2) a review and update of the Green Belt evidence base, in particular the site-specific exceptional circumstances assessment (Topic Paper TP02), to address identified inconsistencies, errors, and issues in the application of the methodology. These updates were subsequently prepared and submitted to the Inspector in January 2026.
- 1.1.4 Following submission of this additional evidence, further correspondence³ between the Council and the Planning Inspectorate resulted in a request for additional work to consider the suitability of specific urban and Green Belt sites for potential allocation within the Local Plan.
- 1.1.5 As a result, the Council was required to produce, among other documents, an addendum to the Regulation 19 Final HRA Report (February 2025)⁴. This Regulation 19 HRA Addendum Report (April 2026)⁵ considered the implications of approximately 1,000 additional dwellings across urban and Green Belt sites in the context of the Local Plan as a whole, and assessed whether the resulting changes to the Plan altered the conclusions of the Regulation 19 HRA.

¹ Epsom and Ewell Borough Council (December, 2024) Proposed Submission Epsom & Ewell Local Plan 2022 – 2040 – Regulation 19.

² Lepus Consulting (February 2025). Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Final Habitats Regulations Assessment. Available at https://www.epsom-ewell.gov.uk/sites/default/files/documents/residents/planning/planning-policy/other-planning-documents/examination/SD04a%20Final%20HRA%20Report%20Reg%2019%20Feb%2025_Copy.pdf [Date accessed: 03/09/26].

³ Planning Inspectorate (2026) Examination of the Epsom & Ewell Local Plan. Available at: <https://www.epsom-ewell.gov.uk/sites/default/files/documents/residents/planning/planning-policy/other-planning-documents/examination/ID-020%20EE%20post%20hearing%20letter%203.pdf> [Date accessed: 03/09/26]

⁴ Lepus Consulting (2025). Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Final Habitats Regulations Assessment. Available at https://www.epsom-ewell.gov.uk/sites/default/files/documents/residents/planning/planning-policy/other-planning-documents/examination/SD04a%20Final%20HRA%20Report%20Reg%2019%20Feb%2025_Copy.pdf [Date accessed: 03/09/26]

⁵ Lepus Consulting (2026) Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Addendum Report. Available at: https://epsom-ewell.inconsult.uk/gf2.ti/-/1873858/285266597.1/PDF/-/COUD_031%20HRA%20Addendum%20-%20April%202026.pdf [Date accessed: 03/09/26]

- 1.1.6 The proposed changes to the Local Plan assessed in the Addendum Report were subsequently submitted to the Planning Inspectorate alongside the relevant supporting evidence. Following consideration of this material by the Inspector, the Local Plan has been further refined and a number of proposed Main Modifications have been identified. An HRA is therefore required to assess the Local Plan incorporating these Main Modifications.

1.2 Purpose of this report

- 1.2.1 This Main Modifications HRA Report supplements the earlier HRA outputs delivered alongside preparation of the Epsom and Ewell Local Plan as listed below:

- Regulation 18 Draft Local Plan HRA: Preferred Options (January 2023)⁶;
- Regulation 19 Publication Plan Interim HRA (November 2024)⁷;
- Regulation 19 Final HRA (February 2025)⁸; and,
- Regulation 19 HRA Addendum Report (April 2026)⁹.

- 1.2.2 This HRA report forms part of the series of HRA reports that have been prepared to document the iterative HRA process. It focuses on whether the proposed modifications made to the submitted Local Plan since the EiP hearings will result in new LSEs upon any European site, and whether the conclusions of the HRA reports listed at **paragraph 1.2.1** remain valid in light of these proposed modifications. European sites include Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites¹⁰. This report does not contain all information normally presented in an HRA report and should therefore be read in conjunction with the HRA reports listed at **paragraph 1.2.1**.

- 1.2.3 This HRA has been prepared in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended)¹¹, known as the Habitats Regulations and has been informed by the National Planning Policy Framework (NPPF)¹². and Planning Practice Guidance (PPG)¹³.

- 1.2.4 All proposed modifications have been assessed through the HRA process to identify LSEs, with the findings presented in **Appendix A**. This assessment considers whether any impact pathways exist that could result in an LSE on any European site.

⁶ Lepus Consulting (2023) Habitats Regulations Assessment of the Epsom and Ewell Draft Local Plan, Public Consultation: Regulation 18. Available at <https://www.epsom-ewell.gov.uk/submissiondocuments> [Date accessed: 03/09/26]

⁷ Lepus Consulting (2024) Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Publication Plan 2019: Interim Habitats Regulations Assessment. Available at <https://www.epsom-ewell.gov.uk/submissiondocuments> [Date accessed: 03/09/26]

⁸ Lepus Consulting (2025). Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Final Habitats Regulations Assessment. Available at https://www.epsom-ewell.gov.uk/sites/default/files/documents/residents/planning/planning-policy/other-planning-documents/examination/SD04a%20Final%20HRA%20Report%20Reg%2019%20Feb%2025_Copy.pdf [Date accessed: 03/09/26]

⁹ Lepus Consulting (2026) Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Addendum Report. Available at: https://epsom-ewell.inconsult.uk/qf2.ti/-/1873858/285266597.1/PDF/-/COUD_031%20HRA%20Addendum%20-%20April%202026.pdf [Date accessed: 03/09/26]

¹⁰ Wetlands of international importance (both listed and proposed).

¹¹ The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date accessed: 03/09/26]

¹² Ministry of Housing, Communities and Local Government (2024) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 03/09/26]

¹³ Ibid.

2 Previous Epsom and Ewell Local Plan HRA findings

2.1 Summary of previous HRA outputs

2.1.1 Habitats Regulations Assessment has been undertaken iteratively throughout the preparation of the Epsom and Ewell Local Plan. This has included assessment at both the Regulation 18 and Regulation 19 stages, and has involved the production of the four output reports listed in **paragraph 1.2.1**. The findings and conclusions from each of these reports is summarised briefly below.

Regulation 18 Draft Local Plan HRA: Preferred Options (January 2023)¹⁴

2.1.2 An initial scoping assessment of the following European sites located within a 15km search distance from the Plan area was completed:

- Mole Gap to Reigate Escarpment SAC;
- Richmond Park SAC;
- South West London Waterbodies SPA;
- South West London Waterbodies Ramsar;
- Thames Basin Heaths SPA; and,
- Wimbledon Common SAC.

2.1.3 This was followed by an initial screening assessment of Local Plan policies, which was used to inform the progression of the Local Plan to Regulation 19.

Regulation 19 Publication Plan Interim HRA (November 2024)¹⁵

2.1.4 An updated screening assessment for LSEs upon European sites was completed. The following four European sites were screened in for further consideration in the HRA process, based upon the outlined impact pathways:

- Mole Gap to Reigate Escarpment SAC – air quality and recreational pressure;
- South West London Waterbodies SPA – water quantity;
- South West London Waterbodies Ramsar – water quantity; and,
- Wimbledon Common SAC – water quantity.

2.1.5 Given the identification of the above LSEs, an Appropriate Assessment (AA) of policies and site allocations within the Publication Local Plan was required. The Publication Plan Regulation 19 Interim AA focused on hydrological, air quality and recreational impacts at a number of European sites. The Interim HRA concluded no adverse impacts from recreational pressure or hydrological impact pathways; however, the HRA was not able to reach a conclusion regarding potential adverse air quality impacts upon the site integrity of Mole Gap to Reigate Escarpment SAC due to timescales associated with the collation of air quality modelling data.

¹⁴ Lepus Consulting (2023) Habitats Regulations Assessment of the Epsom and Ewell Draft Local Plan, Public Consultation: Regulation 18. Available at <https://www.epsom-ewell.gov.uk/submissiondocuments> [Date accessed: 03/09/26]

¹⁵ Lepus Consulting (2024) Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Publication Plan 2019: Interim Habitats Regulations Assessment. Available at <https://www.epsom-ewell.gov.uk/submissiondocuments> [Date accessed: 03/09/26]

Regulation 19 Final HRA (February 2025)¹⁶

- 2.1.6 The Final HRA included an AA which took mitigation into consideration. To inform the air quality AA, a review of air quality modelling was undertaken. It was concluded that no adverse impacts on the site integrity of any European site are anticipated due to a change in air quality, water quality or quantity, or an increase in recreational pressure, as a result of the Local Plan either alone or in-combination.

Regulation 19 HRA Addendum Report (April 2026)¹⁷

- 2.1.7 The HRA Addendum Report was conducted to account for the consideration of potential additional allocations (urban and Green Belt sites) put forward by the Council following comments received from the Planning Inspectorate at the EiP. This report was intended to be read in conjunction with the previous three HRA outputs. It focused upon whether the added site allocations would result in LSEs upon any European site, and thus whether the conclusions of the February 2025 Final HRA remain valid.
- 2.1.8 The Addendum Report concluded that the potential additional sites have the potential to result in LSEs upon the following European sites:
- Mole Gap to Reigate Escarpment SAC – air quality and recreational pressure;
 - South West London Waterbodies SPA – water quantity;
 - South West London Waterbodies Ramsar – water quantity; and,
 - Wimbledon Common SAC – water quantity.
- 2.1.9 The HRA Addendum Report therefore progressed to the next stage of the HRA process: AA. The following matters were explored in more detail:
- Impacts on designated features affected by a possible deterioration in air quality;
 - Impacts on water quantity associated with increased levels of built development; and,
 - Impacts associated with increased recreational pressure.
- 2.1.10 This AA which considered the implications of adding the further proposed sites to the final Local Plan site allocations concluded no adverse impacts on site integrity at any European site due to a change in air quality, water quantity or an increase in recreational pressure as a result of the Local Plan, either alone or in-combination. Therefore, the conclusions of the February 2025 Final HRA were deemed to remain valid.
- 2.1.11 This report will determine whether the conclusions of the Addendum Report remain valid, by assessing whether the proposed Main Modifications made to the Local Plan compromise the integrity of any European site through their impact alone, or in combination with other plans or projects.

¹⁶ Lepus Consulting (2025). Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Final Habitats Regulations Assessment. Available at https://www.epsom-ewell.gov.uk/sites/default/files/documents/residents/planning/planning-policy/other-planning-documents/examination/SD04a%20Final%20HRA%20Report%20Reg%2019%20Feb%2025_Copy.pdf [Date accessed: 03/09/26]

¹⁷ Lepus Consulting (2026) Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Addendum Report. Available at: https://epsom-ewell.inconsult.uk/gf2.ti/-/1873858/285266597.1/PDF/-/COUD_031%20HRA%20Addendum%20-%20April%202026.pdf [Date accessed: 03/09/26]

3 HRA evaluation of Main Modifications

3.1 Methodology

- 3.1.1 The proposed Main Modifications have been reviewed using the HRA methodology set out in Chapter 2 of the Regulation 19 Final HRA (February 2025)¹⁸. The assessment considered whether any of the proposed Main Modifications introduced new likely significant effects (LSEs) upon European sites or altered the conclusions of the previous HRA work.

3.2 Results

- 3.2.1 The results of the assessment of the proposed Main Modifications incorporated in the Local Plan are presented in **Appendix A**. The right-hand column identifies whether there are any LSEs which may trigger a change to the conclusions of the most recent HRA work: the Regulation 19 HRA Addendum Report (April 2026¹⁹).
- 3.2.2 The majority of the proposed Main Modifications comprise clarifications to policy wording, updates to supporting text, corrections and consequential amendments. These alterations are not anticipated to give rise to significant change to the impact pathways assessed through the HRA process (air quality, water quality and quantity, recreational pressure and urbanisation effects). Therefore, no new LSEs upon European sites are identified as a result of these alterations.
- 3.2.3 The proposed Main Modifications also comprise changes to the site allocations that have been proposed since the publication of the Regulation 19 Final HRA. All of the updated proposed sites are encompassed by the quanta previously assessed in the Regulation 19 HRA Addendum Report. As such, the conclusions drawn in the Addendum Report still stand and there is no identification of new LSEs upon European sites.
- 3.2.4 The conclusions drawn in the Regulation 19 HRA Addendum Report remain applicable. None of the proposed Main Modifications assessed in this report introduce new impact pathways or alter the mitigation measures relied upon by the HRA.

3.3 Conclusion

- 3.3.1 The review of the proposed Main Modifications has concluded that they do not alter the conclusions of the Regulation 19 HRA Addendum Report (April 2026). The conclusions of the AA therefore remain unchanged, namely that the Local Plan, as modified, will not adversely affect the integrity of any European site, either alone or in combination with other plans and projects.

¹⁸ Lepus Consulting (2025). Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Final Habitats Regulations Assessment. Available at https://www.epsom-ewell.gov.uk/sites/default/files/documents/residents/planning/planning-policy/other-planning-documents/examination/SD04a%20Final%20HRA%20Report%20Reg%2019%20Feb%2025_Copy.pdf [Date accessed: 03/09/26].

¹⁹ Lepus Consulting (2026) Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Addendum Report. Available at: https://epsom-ewell.inconsult.uk/gf2.ti/-/1873858/285266597.1/PDF/-/COUD_031%20HRA%20Addendum%20-%20April%202026.pdf [Date accessed: 03/09/26]

Appendix A: Schedule of Main Modifications and Main Modifications Assessment

Schedule of Proposed Main Modifications to the Submitted Epsom and Ewell Local Plan

The modifications below are expressed either in the conventional form of ~~strike through~~ for deletions and underlining for additions of text.

The page numbers and paragraph numbering below refer to the submission Local Plan, and do not take account of the deletion or addition of text.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM1	10-12	Introduction	<p>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' <u>(identifiable by the policy starting with the prefix S)</u>, and 'site allocations' <u>(identifiable by the policy starting with the prefix SA)</u>, which set the strategy for the Local Plan and provide the high-level principles that development must adhere to. 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. Specific land designations are detailed on the Policies Map which accompanies the Local Plan.</p> <p>There are also detailed (non-strategic) policies called 'Development Management' policies, <u>(identifiable by the policy starting with the prefix DM)</u>, which provide the detailed criteria and standards which proposed development will be assessed against. Non-strategic policies in this Local Plan may be superseded by any policies identified in future Neighbourhood Plans.</p> <p>The number of people employed in the borough is forecast to increase by over 6,069 jobs over the Local Plan period <u>which will generate a need for at least 41,464 sqm of additional employment floorspace</u> (HEDNA, 2023).</p>	<p>To be clear which policies within the Local Plan are strategic, non-strategic and site allocations, to ensure the plan is effective and positively prepared</p> <p>Necessary to identify the employment needs in the borough over the plan period to ensure the plan is effective and positively prepared</p>	No. The additional information (reference to floorspace) does not deviate from that which was assessed in the HRA Addendum; therefore, no new LSEs are identified which may compromise European site integrity.
MM2	15-16	Vision	<p>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 sets should set out a vision. The vision is should be ambitious but achievable. In addition, to support this vision, strategic objectives will prioritise outcomes and provide a reference point that both ground and justify policies in the Local Plan.</p>	Necessary to amend wording to ensure clarity effectiveness.	No. The change to wording does not introduce any new LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>Vision</p> <p>The vision for the borough up to 2040 is: Epsom and Ewell will continue to <u>By 2040, the borough will</u> 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.</p> <p><u>Its identity will have been strengthened, with new developments and supporting public realm enhancements demonstrating high quality sustainable design that contributes positively to the local character and heritage of the built and natural environment.</u></p> <p><u>Epsom Town Centre, as the principal urban centre with excellent public transport, will remain a thriving centre, providing new homes, employment opportunities, retail, leisure, culture and community facilities including modern facilities for the University for the Creative Arts and the Laine Theatre Arts School.</u></p> <p><u>Ewell Village and Stoneleigh Broadway centres will provide hubs for the communities they serve through convenience shopping and other commercial services and public services.</u></p> <p><u>The Epsom Downs racecourse will continue to be a significant part of the borough's unique identity alongside a successful racehorse training industry. The wider economy will be thriving, benefiting from high-speed digital infrastructure, and</u></p>	Vision has been reordered and reworded to be more concise, necessary for effectiveness	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p><u>performing to its full economic potential, attracting new, and supporting existing businesses, from start-ups to larger companies.</u></p> <p><u>New homes will have been delivered, including the creation of vibrant new communities with their own identities, providing homes for people of all ages with supporting infrastructure including improved public transport and pedestrian and cycling routes, social infrastructure and access to blue and green infrastructure.</u></p> <p>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.</p> <p>New development will have been focused on urban sites, with the role of Epsom Town Centre of paramount importance having seen the most exciting and significant opportunities for growth.</p> <p>New vibrant communities with their own identities will be centred around previously underdeveloped transport hubs and principal movement corridors.</p> <p>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.</p> <p>The Epsom Downs racecourse will continue to be a significant part of the borough's unique identity and support a thriving equestrian sector.</p>		

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>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, whilst supporting the existing shops, leisure cultural uses, public transport services and community facilities that are so valued by existing residents.</p> <p>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.</p> <p>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.</p> <p>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 longer term.</p>		

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>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.—</p> <p>Epsom and Ewell will continue to be valued by those who live in, work in and visit it. It's network of green spaces that are embedded within communities will have been strengthened by development. With new public open spaces as well as enhancements to the borough's existing streets and green spaces, improvements in habitats for wildlife, and provision of better links between existing green and blue infrastructure, amenity for both new and existing residents will be secured.—</p> <p>Growth will be different from what it has been before. There will be a greater emphasis on design and built quality, the delivery of environmentally sustainable homes, 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 sustainable development.—</p> <p>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.—</p>		

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM3	18-23	Policy S1	<p>3.5. The urban areas of the borough have been thoroughly assessed through the Land Availability Assessment (LAA) 2024, to identify the amount of development that could be sustainably and achievably accommodated. It was found that the urban sites can only provide approximately 1,628,336 dwellings <u>which when combined with completions, commitments and windfalls accounts for</u> (approximately 35% of the identified need for housing within the borough based on the 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.</p> <p>3.9. Through the allocation of five <u>nine</u> sites to be inset <u>removed</u> from the Green Belt, the council will be able to deliver an additional 1,580,497 dwellings over the plan period, which combined with the urban area supply equates to approximately 48% of the need established by the standard methodology. This is the council's preferred spatial strategy which balances social, economic and environmental objectives.</p> <p>3.13. The council has carried out a robust and objective assessment of its employment needs which is detailed in the HEDNA. 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. The HEDNA shows that there is demand for <u>at least 41,464 sqm</u> of additional employment floorspace in the area to meet the needs of existing businesses and to cater for new businesses.</p> <p><i>New paragraphs in-between para. 3.13 and 3.14:</i></p>	<p>Necessary to ensure plan reflects the correct numbers to ensure plan is justified and effective and consistency with national policy</p> <p>Necessary to clarify employment needs to ensure the plan is effective and positively prepared.</p>	<p>No. Potential implications of the allocation of additional urban and Green Belt sites to facilitate the provision of over 6,012 new homes and 41,464sqm was assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the propositions of Policy S1 are in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.</p>

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p><u>The HEDNA employment modelling based on the baseline jobs growth scenarios forecasts over the Local Plan period a need for approximately:</u></p> <p><u>13,000 sqm of office and R&D (E(g)(i)(ii)) floorspace</u></p> <p><u>13,000 sqm of light and general industrial floorspace (E(g)(iii) and B2).</u></p> <p><u>15,500 sqm of warehousing floorspace (B8)</u></p> <p><u>In relation to supply, making use of vacant office floorspace in borough, specifically, Epsom Town Centre is likely to satisfy forecast employment needs for office accommodation over the plan period.</u></p> <p><u>In terms of needs for light industrial, industrial and warehousing floorspace this will be met through the completion of planning permissions that have commenced (approx. 5,000sqm), some additional employment land at Site Allocation SA35, an expansion of Longmead Industrial Estate and the intensification of the Longmead and Kiln Lane Industrial Estates to meet the residual need for 23,000sqm of industrial and warehousing space over the plan period.</u></p> <p>3.17. The council has carried out a Retail and Commercial Leisure Needs Assessment (2020 and update 2021), which identifies no substantial additional comparison or convenience needs and recommends a strategy of consolidation rather than growth for Epsom Town Centre and Stoneleigh and Ewell Village local centres. <u>These conclusions were revisited in 2025 and concluded to be robust.</u></p> <p>3.20. 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</p>	<p>New paragraphs to clarify employment needs necessary to ensure the plan is effective and consistent with national policy</p> <p>Modification to clarify the most recent review of the retail needs evidence is up to date and robust. Necessary for clarity and effectiveness</p> <p>Amendment necessary to address drafting error, hierarchy is listed</p>	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>these locations and further detail on their role in the spatial strategy is shown in <u>Figure 3.1 the hierarchy of development detailed below:</u></p> <p>3.22. The hierarchy of development is detailed overleaf:</p> <p>3.31. Whilst these sustainable locations are our preferred locations for new development, they do not deliver adequate housing to meet our social responsibilities to provide additional housing. For this reason, the Local Plan contains five site allocations that will make a substantial contribution towards meeting housing and Gypsy and Traveller accommodation needs over the Plan period on land that is inset removed from the Green Belt.</p> <p>3.32. The spatial strategy incorporates appropriate previously developed land within the existing built-up area <u>to be removed from the Green Belt</u> currently designated as Green Belt (site allocations SA31 and SA32) and greenfield land in the most sustainable locations adjacent to the existing built-up areas that are proposed to be removed from the Green Belt (site allocations SA33 to SA35 <u>and SA48 to SA51</u>).</p> <p>3.33. When considering all sources of supply, the Local Plan housing requirement has been set as a minimum of 4,700 <u>6,012</u> dwellings over the plan period (2022-2040).</p> <p>How the council will achieve this minimum requirement is set out in Table S1a below. It should be noted that the supply includes a windfall allowance, which is based on past delivery trends. The total supply exceeds the requirement by 40244 dwellings, which provides a degree of flexibility over the Local Plan period should</p>	<p>- no figure 3.1. Removal of duplicated wording. Necessary for effectiveness. Deleted text, necessary for effectiveness, to avoid unnecessary duplication</p> <p>Modified to more appropriate wording, necessary for effectiveness and consistency with national policy Modified to appropriate wording addressed in later policy. Necessary for effectiveness and to remove unnecessary duplication. Modified to reflect increased housing supply and trajectory, necessary for plan to be positively prepared</p>	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?																				
			<p>sites fail to be delivered. Further details of the sites that are key to delivering the strategy are contained in the site allocations policies of the Local Plan and shown on the Policies Map. How and when the different sources of supply are anticipated to deliver housing is contained in the Housing Trajectory (Appendix 2).</p> <p>Table S1a: Sources of supply over the Local Plan period: 2022-2040 (net number of new homes)</p> <table><tr><th>Source of supply</th><th>Net no. of units</th></tr><tr><td>Housing Requirement</td><td><u>6,012</u> 4,700</td></tr><tr><td>Housing completion to date (April 2022 to March 2024<u>26</u>)</td><td><u>605</u> 456</td></tr><tr><td>Commitments (permissions as of April 2024<u>26</u>) with 10% lapse rate applied</td><td><u>604</u> 600</td></tr><tr><td>Windfall (1-4 units)</td><td><u>385</u> 455</td></tr><tr><td>Windfall (5-19 units)</td><td><u>333</u> 407</td></tr><tr><td>Large urban sites (20+ units)</td><td><u>1,477</u> 1,313</td></tr><tr><td>Small urban sites (5 to 19 units)</td><td><u>151</u> 403</td></tr><tr><td>Allocations beyond current urban area to be inset <u>removed</u> from the Green Belt</td><td>2,497 <u>1,580</u></td></tr><tr><td>Total supply over the plan period</td><td>4,914 <u>6,052</u></td></tr></table>	Source of supply	Net no. of units	Housing Requirement	<u>6,012</u> 4,700	Housing completion to date (April 2022 to March 2024 <u>26</u>)	<u>605</u> 456	Commitments (permissions as of April 2024 <u>26</u>) with 10% lapse rate applied	<u>604</u> 600	Windfall (1-4 units)	<u>385</u> 455	Windfall (5-19 units)	<u>333</u> 407	Large urban sites (20+ units)	<u>1,477</u> 1,313	Small urban sites (5 to 19 units)	<u>151</u> 403	Allocations beyond current urban area to be inset <u>removed</u> from the Green Belt	2,497 <u>1,580</u>	Total supply over the plan period	4,914 <u>6,052</u>	<p>and consistent with national policy</p> <p>It is necessary for the policy to modify housing requirements in order to be positively prepared and consistent with national policy</p>	
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			<p>Policy S1 – Spatial Strategy</p> <p>During the plan period (2022-2040):</p> <p>provision has been made for at least 4,700 <u>6,012</u> new homes The minimum requirement is split into an annual average requirement on a stepped basis as follows:</p> <p><u>Years 1 – 4 (2022/23 – 2025/26) – 152 homes per annum</u></p> <p><u>Years 5 – 18 (2026/27 – 2039/40) – 386 homes per annum</u></p> <p>Table S1a shows the contribution of all sources of housing supply to deliver this housing requirement.</p> <p>Employment needs <u>At least 41,464 sqm of employment floorspace</u> (office, light industrial, industrial and warehousing) will be met <u>delivered</u> through the development and intensification of the strategic employment sites (as defined on the policies map), and the delivery of additional employment floorspace that is compatible with residential use in Epsom Town Centre.</p>	<p>Modified to reflect increased housing supply and trajectory</p> <p>Modified policy to specify employment and retail needs.</p> <p>Additional text to create Part 2 of the policy.</p> <p>Text relocated and reworded from Policy S2 and the supporting text</p> <p>It is necessary for the policy to set housing and employment land requirements in order to ensure the policy is effective, positively prepared and consistent with national policy and to ensure the policy is effective.</p>	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>Retail needs Any need arising for additional retail will be met through the consolidation and enhancement of existing facilities within existing Epsom Town Centre, local centres and neighbourhood parades.</p> <p>Provision has been made for 10 permanent pitches for Gypsies and Travellers within Epsom and Ewell over the plan period. The council will seek to make provision for additional pitches for Gypsies and Travellers by permitting suitable sites.</p> <p><u>The Council will expect the development proposals and use of land to contribute positively to the social, economic and environmental enhancement of the Borough.</u></p>		

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM4	24	Key diagram	Insert copy of existing and proposed key diagram to show reference to removal of inseting of Green Belt Boundary, the correct Green Belt boundaries and new site allocations.	To ensure the key diagram is positively prepared and consistent with national policy	No. Potential implications of the allocation of additional sites within the Green Belt were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Pictural representation of development within the Green Belt does not deviate from the Addendum Report assessment; thus, no further LSEs that may compromise European site integrity are foreseen.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM5	25	Policy S2	<p>Policy S2 – Sustainable and Viable Development</p> <p>3.35. Local Plans should be based upon and reflect the presumption in favour of sustainable development detailed in the National Planning Policy Framework. This principle informs both the policies and site allocations contained within the Local Plan and will be used to guide decision making.</p> <p><u>3.35. Policy requirements of this plan have been tested and concluded to be viable. This has been confirmed by the viability assessment of the Local Plan. There should be no need for a further viability assessment at the decision-making stage. Unless the applicant advises that a late stage review is necessary. Site promoters will be expected to take account of costs arising from the policy requirements set out in the plan when negotiating to purchase land for development. The price paid for land is not a justification for failing to comply with the relevant policies in the Plan.</u></p> <p><u>3.36. Where particular circumstances justify the need for a viability assessment at the application stage, it will be up to the applicant to demonstrate how those circumstances differ from the viability assessment carried out to inform the Plan, having regard to the specific grounds set out in national planning guidance. The viability assessment will usually 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.</u></p> <p>3.36.3.37. To facilitate an efficient decision-making process, any financial viability report/appraisal must be in compliance with the Homes England Development</p>	<p>Modified supporting text of Policy S2 to reflect the focus on viability as the sustainable development element of the policy has been moved to Policy S1</p> <p>Necessary for effectiveness and in order to reflect changes to other policies in the Plan</p> <p>Additional text necessary for effectiveness and to reflect changes to other policies in the Plan removing unnecessary duplication</p>	No. Changing the wording of Policy S2 to shift the focus away from sustainability, which has been absorbed into Policy S1, does not introduce any new LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>Appraisal Tool (DAT) or any future equivalent standard. If this is not provided it will delay the application or lead to the refusal of planning permission.</p> <p>3.37. 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.</p> <p>3.38. By 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 late stage viability review mechanisms through s106 agreements where policy requirements are not met in full at the time permission is granted.</p> <p><u>Viability late stage reviews</u></p> <p><u>3.39. The Council recognises that financial viability will vary over time with the changing economic and property markets and that viability assessments submitted in support of developments are only current at the time that they are prepared. Therefore, the council will require late-stage viability review mechanisms through a legal agreement where policy requirements are not met in full at the time permission is granted.</u></p>	<p>Modified text necessary for effectiveness and to ensure policy is positively prepared</p> <p>...</p> <p>Necessary for the effectiveness for the policy to specify circumstances where the Council may require late stage viability review</p>	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>3.39 3.40. The council's position for late-stage viability reviews 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.</p> <p>3.40 3.41. On larger sites that are expected to be built out over a number of years, or in phases, the council will require viability to be re-assessed at multiple stages (such as prior to the commencement of different phases).</p> <p>3.44 3.42. For schemes where the outturn test <u>late stage review</u> demonstrates that viability has improved and the <u>approved</u> scheme did not satisfy the <u>affordable housing policy</u> requirements set out in the Local Plan, the council will <u>expect additional affordable housing to be provided on-site or in exceptional circumstances, an in lieu contribution to off-site affordable housing, will be required work with the developer to deliver increased affordable housing provision having regard to the outcomes of the late stage review. Additional affordable housing should be provided on site (where feasible) or through an in lieu contribution to offsite affordable housing.</u></p> <p>Policy S2 – Sustainable and Viable Development</p> <p>Sustainable Development</p> <p>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.</p>	<p>Necessary for effectiveness for 'sustainable development' parts of the policy moved to policy S1 and to remove unnecessary duplication</p>	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>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.</p> <p>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:</p> <p>a) any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework or taken as a whole; or</p> <p>b) specific policies in the National Planning Policy Framework indicate that development should be restricted.</p> <p>Viable Development</p> <p>41) Viability will only be considered a constraint in exceptional circumstances and where there are significant additional costs not anticipated through the Local Plan process. The starting point is that the policy requirements detailed in this plan are viable and that development proposals should meet all policy requirements in full.</p> <p>52) In order to demonstrate viability constraints to justify not meeting the local plan policy requirements in full, proposals must be supported by viability study. 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. Where applicants consider particular circumstances justify the need for a viability assessment at the application stage, they will need to demonstrate how those circumstances differ from the viability assessment carried out to inform the Local Plan, such as that there are</p>		

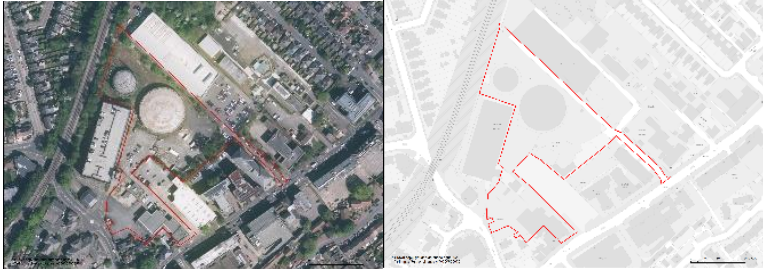
Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p><u>unforeseen significant additional costs. The council will commission an independent review of submitted viability assessments which will be funded by the applicant.</u></p> <p>6) Where an applicant submits a viability assessment, the council will commission an independent review of the costs of which will be funded by the applicant.</p> <p>73) Where it is concluded that the development would be unviable if it were to comply with the policies in this plan, the council will require an applicant to enter into a legal agreement to review viability at a specific stage or stages in the delivery of the development.</p>		

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MM6	27	Policy S3	Policy S3 – Climate Change <u>Adaption</u> and Mitigation	To ensure the name of the policy more accurately reflects what the policy covers, necessary for effectiveness	No. The change to the title wording of Policy S3 does not introduce any new LSEs that may compromise European site integrity.

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MM7	30	Policy S4	<p>Policy S4: Epsom Town Centre</p> <p><u>Epsom Town Centre is defined on the policies map. Development will be permitted here which:</u> The Council will work with partners and private developers to:</p> <p><u>Promotes</u> Encourage the regeneration of the town centre to deliver high quality <u>and high density</u> development <u>that makes efficient use of land</u> through the redevelopment of the site allocations detailed in this plan and other windfall sites that may come forward in the future;</p> <p>Encouraging <u>Secures</u> a diverse mix of uses, where possible, including housing (including specialist accommodation), retail, offices, higher education and the creative and cultural industry, food and drink establishments, health and community spaces;</p> <p><u>Maintains</u> and <u>enhances</u> the visitor experience and night-time economy;</p> <p><u>Retains</u> and <u>enhances</u> existing markets and support opportunities for the creation of new markets;</p> <p><u>Delivers</u> high quality public realm integrating tree planting, landscaping and good quality design to assist in delivering the aspirations of the Epsom Town Centre Masterplan;</p> <p><u>Supports</u> the delivery of the Surrey Local Transport Plan 4 and any successors, and proposals in the Epsom and Ewell Local Cycling and</p>	<p>Modifications to include adding reference to the efficient use of land, securing mixed uses and criteria g. Necessary for the effectiveness of the policy</p>	<p>No. Land usage covered by the policy (including effective and mixed usage) was encompassed in the HRA Addendum assessment. No additional LSEs that may compromise European site integrity have been introduced through the modification.</p>

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>Walking Infrastructure Plan to support the transition towards zero carbon transport;</p> <p>Ensures the distinctive character of Conservation Areas within the town centre boundary are conserved and, where possible, or enhanced.</p> <p>3.52 Epsom Town Centre is the main centre for the borough and provides for a mix of shopping, leisure, civic, cultural and community facilities. The boundary of the town centre is shown on the policies map.</p>	Necessary for effectiveness to recognise the role that residential use play within the town centre and remove the reference to policies map as this has been moved to the policy wording	
MM8	32	Para 4.3	<p>4.3. Site Allocation policies SA1 – SA30, <u>and SA36-SA47</u> - set out the residential-led site allocations within the borough's urban area, whilst policies SA31-SA35, <u>SA48-SA51</u> allocate land for development that is to be <u>removed</u> inset from the Green Belt.</p>	<p>Modified to more appropriate wording on Green Belt allocations and the additional references to additional site allocations</p> <p>Necessary for effectiveness and ensuring the Plan is positively prepared</p>	No. Potential implications of the allocation of additional sites within the borough's urban areas and Green Belt were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the proposed additional sites are in-keeping with the findings

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					of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM9	33	Policy SA1	<p>Policy SA1 – Southern Gas Network Site</p> <p>Allocated for: Approximately <u>A minimum of 455 456 dwellings (C3)</u> and a bespoke performing arts centre for the Laine Theatre Arts.</p> <p>Site Area: 4.54-61.69 <u>ha</u></p> <p>Planning history: Application <u>reference</u> 24/01107/FUL (<u>permitted</u>)</p> 	<p>Modified to reflect number of units as a minimum of 456 dwellings necessary to ensure consistent with national policy and optimising density</p> <p>Removed 'C3' , Modified site area and added 'permitted' with the addition of application 'reference' wording all for effectiveness</p> <p>Part a) modified for effectiveness and to recognise potential conflict between users in this location</p>	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the proposed additional site is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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			 <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>that is designed to minimise potential conflict between car users, pedestrians and cyclists.</u></p> <p>Provide a linear <u>public</u> open space to provide permeability through the site for pedestrians and cyclists into and from the development to provide connectivity between Hook Road and the Rainbow Leisure Centre.</p> <p>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.</p> <p>Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.</p> <p>Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the railway that adjoins the northern boundary of the site.</p>	<p>Part b) amended to reflect planning permission</p> <p>Remaining parts of the policy amended for effectiveness</p>	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>Conserve and, where possible, or enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings that adjoin the site, <u>through design incorporating positive elements of local character and appearance.</u></p> <p>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</p> <p><u>Be designed Design</u> to enable the comprehensive redevelopment of the adjoining Hook Road Car Park site (Site Allocation SA2) as a future phase.</p> <p><u>Include mixed use ground floor active frontages providing Commercial, Business and Service floorspace to provide natural surveillance of the public realm.</u></p>		
MM10	35	Policy SA2	<p>Policy SA2 – Hook Road Car Park</p> <p>Allocated for: Approximately <u>A minimum of 145 150</u> dwellings.</p> <p>Site Area: 0.486ha</p> <p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>that is designed to minimise potential conflict between car users, pedestrians and cyclists.</u></p> <p>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.</p>	<p>Modified to reflect number of units as a minimum of 145 dwellings necessary to ensure consistent with national policy and optimising density</p> <p>Parts a, c and f amended for effectiveness</p> <p>Modified part i) to incorporate wording around active frontages necessary for effectiveness</p> <p>Part j) Include wording to reflect future car park</p>	<p>No. The reduction in the proposed number of units to ensure wider policy adherence and optimal development density introduces no further LSEs that may compromise European site integrity.</p>

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			<p>Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.</p> <p>Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the railway that adjoins site.</p> <p>Conserve and, where possible, or enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings.</p> <p>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</p> <p>Be designed as a future phase of the adjoining Southern Gas Networks Site (Site Allocation SA1).</p> <p><u>Include mixed use ground floor active frontages providing Commercial, Business and Service floorspace to provide natural surveillance of the public realm.</u></p> <p><u>Consider the findings of the Councils car parking study and its recommendations in relation to public car parking provision at the site.</u></p>	study to ensure policy is positively prepared	
MM11	36	Policy SA3	<p>Policy SA3 – Solis House, 20 Hook Road</p> <p>Allocated for: Approximately <u>A minimum of 20 dwellings (C3).</u></p> <p>Site Area: 0.07ha</p> <p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access from Hook Road.</p>	<p>Modified to reflect number of units as a minimum necessary to ensure consistent with national policy and optimising density</p> <p>Removed 'C3' as use classes, part a, f and g all modified for effectiveness</p>	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number is

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			<p>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</p> <p>Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining railway line.</p> <p>Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.</p> <p>Conserve and, where possible, or enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings <u>through sensitive design incorporating positive elements of local character and appearance.</u></p> <p>Undertake archaeological investigations in accordance with Policy DM13 45, taking account of the site's location within an Area of High Archaeological Potential.</p> <p><u>Consider the site's prominent location for a high-quality designed landmark building.</u></p>	Part h) Criteria added in terms of design to reflect the site's prominent location to ensure policy is positively prepared	in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM12	37	Policy SA4	<p>Policy SA4 – Bunzl, Hook Road</p> <p>Allocated for: Approximately <u>A minimum of 35 20</u> dwellings.</p> <p>Site Area: 0.17ha</p> <p>Planning history: <u>Application reference 24/00230/FUL & 23/01440/PDCOU (both permitted)</u></p>	<p>Modified to reflect number of units as a minimum of 35 necessary to ensure consistent with national policy and optimising density.</p> <p>Addition of 'application reference' wording and</p>	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the proposed additional sites are in-keeping with the findings

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			<p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site.</p> <p>Conserve and, where possible, or enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings at 10 and 12 Hook Road.</p> <p>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</p> <p>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.</p> <p>Investigate and if identified remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.</p>	<p>permitted for effectiveness</p> <p>Part a) modified to address site specific access for effectiveness</p> <p>Add 'conserve or enhance' to all references in site allocations</p> <p>Part d) For clarification purposes</p>	<p>of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.</p>
MM13	38	Policy SA5	<p>Policy SA5 – Epsom Town Hall</p> <p>Allocated for: Approximately <u>A minimum of</u> 90 dwellings (C3).</p> <p>Site Area: 0.74ha</p> <p>Planning history: None</p>	<p>Modified to reflect number of units as a minimum necessary to ensure consistent with national policy and optimising density</p>	<p>No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the</p>

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			<p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Dullshot Green.</p> <p>Maximise retention and safeguarding of existing trees and incorporate them into a well-integrated landscape strategy.</p> <p>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>Design surface and foul water drainage to include all required measures arising from the site being located in Ground Source Protection Zone 1.</p> <p>Undertake archaeological investigations in accordance with Policy DM1345 taking account of the site's location within an Area of High Archaeological Potential.</p> <p>Conserve and, where possible, or enhance the setting of the Epsom Town Centre Conservation Area and the Grade II listed 'Old Pines' that are located in close proximity to the site <u>through sensitive design incorporating positive elements of local character and appearance.</u></p> <p><u>Retain some public car parking which includes blue badge spaces.</u></p> <p><u>Maximise linkages with the town centre by integrating cross site movement routes for pedestrians and cyclists.</u></p>	Removed 'C3' as use classes, amended parts a, e,f, g and h to ensure policy is positively prepared	integrity of European sites were anticipated. Therefore, the proposed additional sites (alongside greater emphasis on ensuring safe access) are in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM14	39	Policy SA6	<p>Policy SA6 – Hope Lodge Car Park</p> <p>Allocated for: Approximately A minimum of 35 30 dwellings (C3).</p> <p>Site Area: 0.4ha</p> <p>Planning history: None</p>	Modified to reflect number of units as a minimum of 35 necessary to ensure consistent with national	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the

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			<p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Dullshot Green. b) Maximise retention and safeguarding of existing trees and hedgerows, and incorporate them into a well-integrated landscape strategy <u>which frames and provides intervisibility of Dullshot Green as a public space.</u> c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. d) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. e) Undertake archaeological investigations in accordance with policy DM13 45, taking account of the site's location within an Area of High Archaeological Potential. f) Conserve and, where possible, or enhance the setting of Grade II Listed Hope Lodge that adjoins the site boundary to the East <u>through sensitive design incorporating positive elements of local character and appearance.</u> g) <u>Consider the findings of the Councils car parking study and its recommendations in relation to public car parking provision at the site.</u> 	<p>policy and optimising density</p> <p>Removed 'C3' as use classes, amended parts a,b,e and f for effectiveness</p> <p>Amend part g Include wording to reflect future car park study to ensure policy is positively prepared</p> <p>Changes necessary to ensure policy is justified and effective</p>	<p>integrity of European sites were anticipated. Therefore, the proposed additional sites (alongside greater emphasis on ensuring safe access) are in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.</p>
MM15	40	Policy SA7	<p>Policy SA7 – Former Police and Ambulance Station Sites</p> <p>Allocated for: Erection of a new 85 bedroom residential, nursing and dementia care home for the frail elderly (Use Class C2).</p> <p>Site Area: 0.37ha</p>	<p>Modified to removed use class reference, add the addition of 'application reference' wording and deletion of</p>	<p>No. This change introduces no further LSEs that may compromise European site integrity.</p>

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			<p>Planning history: Application reference 22/00923/FUL (approved, subject to S106 agreement)</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Church Street. b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. c) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. d) Conserve and, where possible, or enhance the setting of Grade II building at 45 Church Street that lies beyond the site boundary <u>through sensitive design incorporating positive elements of local character and appearance.</u> e) Minimise loss of existing trees, including appropriate root protection for those immediately adjacent to the site. 	<p>'subject to S106 agreement' all necessary to ensure the policy is positively prepared</p> <p>Parts a and d modified to ensure the policy is effective</p>	
MM16	41	Policy SA8	<p>Policy SA8 – Epsom Clinic</p> <p>Allocated for: Approximately <u>A minimum of</u> 30 dwellings.</p> <p>Site Area: 0.17ha</p> <p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <ul style="list-style-type: none"> a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Dullshot Green. 	<p>Modified to reflect number of units as a minimum of 30 necessary to ensure consistent with national policy and optimising density</p> <p>Part a) site specific vehicular access and</p>	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than

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			<p>b) Conserve and, where possible, or enhance the setting of the Church Street Conservation Area that adjoins the site boundary to the South West and the Grade II Listed Hope Lodge that lies beyond the site boundary to the North <u>through sensitive design incorporating positive elements of local character and appearance.</u></p> <p>c) Undertake archaeological investigations in accordance with Policy DM1345, taking account of the site's location within an Area of High Archaeological Potential.</p> <p>d) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</p> <p>e) Design surface and foul water drainage to include all required measures arising from the site being in Groundwater Source Protection Zone 1.</p> <p>f) Minimise the loss of existing trees and hedgerows within the site.</p>	transport needs modified for effectiveness as are parts b, and c	estimated) site number is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM17	42	Policy SA9	<p>Policy SA9 – Depot Road and Upper High Street Car Park</p> <p>Allocated for: Approximately <u>A minimum of</u> 100 dwellings (C3) and a decked public car park.</p> <p>Site Area: 1.24ha</p> <p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Upper High Street and Church Street.</p>	Modified to reflect the number of units as a minimum of 100 dwellings necessary to ensure consistent with national policy and optimising density. Removed 'C3' use class reference, amend part a, c, and g to ensure the policy is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number is in-keeping with the findings of the Addendum

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			<p>b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</p> <p>c) <u>Conserve or enhance</u> Have regard to the setting of the adjoining Pikes Hill Conservation Area <u>located to the east of the site through sensitive design.</u></p> <p>d) Have regard to the high voltage power cables that run under part of the site to serve the adjoining electricity sub station in the design of the development.</p> <p>e) Undertake archaeological investigations in accordance with Policy DM1345, taking account of the site's partial location within an Area of High Archaeological Potential.</p> <p>f) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</p> <p><u>g) Consider the findings of the Councils car parking study and its recommendations in relation to public car parking provision at the site.</u></p>		Report and no further LSEs that may compromise European site integrity are foreseen.
MM18	43	Policy SA10	<p>Policy SA10 – 79-85 East Street</p> <p>Allocated for: Approximately <u>A minimum of 34 dwellings (C3).</u></p> <p>Site Area: 0.22ha</p> <p>Planning history: <u>Application reference 22/01953/FUL and 22/01954/FUL (both permitted)</u></p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p><u>a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from East Street and/or Linton's Lane.</u></p>	<p>Modified so the number of units reflected as a minimum of 34 units necessary to ensure consistent with national policy and optimising density</p> <p>Removed 'C3' as use class and changed to criteria a and d to ensure the policy is</p>	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number is in-keeping with the findings of the Addendum

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			<p>ab) Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining A24.</p> <p>bc) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>ed) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</p> <p>de) Conserve and, where possible, or enhance the setting of the adjoining Lintons Lane Conservation Area and Grade II Listed buildings <u>at 10 and 12 Lintons Lane through sensitive design incorporating positive elements of local character and appearance.</u></p>	positively prepared and effective	Report and no further LSEs that may compromise European site integrity are foreseen.
MM19	44	Policy SA11	<p>Policy SA11 – Finachem House, 2 – 4 Ashley Road</p> <p>Allocated for: Approximately A minimum of 38 20 dwellings (C3) or 90 units of student accommodation</p> <p>Site Area: 0.12ha</p> <p>Planning history: Pre-application</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p>	Modified so the number of units reflected as a minimum and amended number of units to ensure policy is positively prepared. Removed 'C3' as use class, amended part a, g, e and f addressing site specific	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect an increased site number is

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from the Ashley Road.</p> <p>b) Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining A24.</p> <p>c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>d) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</p> <p>Conserve and, where possible, or enhance the setting of the Epsom Town Centre Conservation Area and the Grade II* listed 'Ashley House' that adjoin the site boundary to the North <u>through sensitive design incorporating positive elements of local character and appearance.</u></p> <p>Undertake archaeological investigations in accordance with Policy DM1345, taking account of the site's location within an Area of High Archaeological Potential.</p> <p><u>g) Consider the site's prominent location for a high-quality design landmark building.</u></p>	requirements for effectiveness	in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM20	45	Policy SA12	<p>Policy SA12 – Global House</p> <p>Allocated for: Approximately <u>A minimum of</u> 75 dwellings (C3)</p> <p>Site Area: 0.29ha</p> <p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide appropriate pedestrian and cycle access to the site <u>from Ashley Avenue</u>.</p> <p>Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining A24.</p> <p>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</p> <p>Conserve and, where possible, or enhance the setting of the nearby Epsom Town Centre Conservation Area and listed buildings <u>through sensitive design incorporating positive elements of local character and appearance</u>.</p> <p>Undertake archaeological investigations in accordance with Policy DM153, taking account of the site's location within an Area of High Archaeological Potential.</p>	<p>Modified to reflect the number of units as a minimum of 75 necessary to ensure consistent with national policy and optimising density.</p> <p>Removed 'C3' as use class, amend part a addressing site specific vehicular access and transport needs and part e for clarification purposes and to reference design, part f to reference correct policy</p> <p>All changes necessary changes for effectiveness</p>	<p>No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.</p>

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM21	46	Policy SA13	<p>Policy SA13 – Swail House</p> <p>Allocated for: Refurbishment of Swail House for residential use <u>(approximately 45 dwellings)</u> and the provision of replacement purpose-built specialist accommodation for the RNIB consisting of approximately <u>a minimum of</u> 45 dwellings (net) located to the rear of Swail House.</p> <p>Site Area: 1.05ha</p> <p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Heathcote Road <u>and pedestrian and cycle access from Heathcote Road and Ashley Road.</u></p> <p>Ensure the site layout maximises retention and safeguarding of mature existing trees, including those covered by a Tree Preservation Orders, incorporating them in a coherent landscaping strategy for the site.</p> <p>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</p> <p>Conserve and, where possible, or enhance the setting of the Church Street conservation area that adjoins the site <u>through sensitive design incorporating positive elements of local character and appearance.</u></p> <p>Retention of the Grade II listed wall that forms part of the site boundary.</p>	Modified to reflect latest position with planning application and to state a minimum number of units. Part a amended to address site specific vehicular access and transport needs modified for precision, part e of the policy amended to add specific design criteria and part g amendment to reference correct policy. All necessary changes made for effectiveness of the policy	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis on safe access) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Undertake archaeological investigations in accordance with Policy DM1345, taking account of the site's location within an Area of High Archaeological Potential.		
MM22	47	Policy SA14	<p>Policy SA14 – 60 East Street</p> <p>Allocated for: Approximately <u>A minimum of</u> 30 dwellings (C3)</p> <p>Site Area: 0.24ha</p> <p>Planning history: <u>Application reference 24/00900/PDCOU (permitted prior approval)</u></p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>from East Street</u>.</p> <p>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</p> <p>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</p>	Modified to reflect a minimum number of units, Use class reference removed, addition of 'application reference' wording and permission, part a amended to address site specific vehicular access and transport needs. All changes necessary for effectiveness of the policy	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis on safe access) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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MM23	48	Policy SA15	<p>Policy SA15 – Corner of Kiln Lane and East Street (101b East Street)</p> <p>Allocated for: Approximately <u>A minimum of</u> 5 dwellings</p> <p>Site Area: 0.03ha</p> <p>Planning history: <u>Application reference</u> 15/01663/FUL (unimplemented)</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Kiln Lane.</p> <p>Design surface and foul water drainage to include all required measures arising from the site being located in Source Protection Zone 1.</p> <p><u>Consider the site's prominent location for a high-quality designed landmark building.</u></p>	Modified to reflect the number of units as a minimum of 5 units necessary to ensure consistent with national policy and optimising density. Addition of 'application reference' wording, additional text to part a to address site specific vehicular access and transport needs and further text to reflect the prominence of the site/landmark building. Necessary for the effectiveness of the policy	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM24	49	Policy SA16	<p>Policy SA16 – Land at Kiln Lane</p> <p>Allocated for: Approximately <u>A minimum of</u> 40 dwellings</p> <p>Site Area: 0.67ha</p> <p>Planning history: None</p>	Amended to reflect the number of units as a minimum, necessary to ensure consistent with national policy and optimising density.	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>from Kiln Lane</u>.</p> <p>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</p> <p>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</p> <p><u>Design the scheme to ensure the amenity impacts on future occupiers from adjacent non-residential uses is adequately addressed.</u></p>	Parts a and e additional text to ensure regard is had to residential amenity given the proximity of industrial uses. Necessary changes made for effectiveness	integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis on safe access) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM25	50	Policy SA17	<p>Policy SA17 – Hatch Furlong Nursery</p> <p>Allocated for: Approximately <u>A minimum of</u> 30 dwellings (C3)</p> <p>Site Area: 0.5ha</p> <p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide appropriate vehicle, pedestrian and cycle access to the site from Castle Way or the A24 Ewell Bypass which meets all relevant requirements of the</p>	Modified to reflect number of units as a minimum of 30 necessary to ensure consistent with national policy and optimising density. Use class reference removed, Part a amended to clarify how access to the site will be achieved. Part d removed to reflect	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>Highways Authority with regard to accessibility and safety. <u>Provide pedestrian and cycle access to the site from Cheam Road.</u></p> <p>Maximise retention and safeguarding of existing trees and hedgerows, and incorporate them into a well-integrated landscape strategy.</p> <p>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</p> <p>d) Design surface and foul water drainage to include all required measures arising from the site being in Groundwater Source Protection Zone 2.</p> <p>e) d) Undertake archaeological investigations in accordance with policy DM1345, taking account of the site's location within an Area of High Archaeological Potential.</p> <p>f) e) Provide suitable noise attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from traffic on the A24 Ewell Bypass.</p>	correct mapping data, Part e amendment to reference correct policy. Necessary changes made for effectiveness of the policy	emphasis on safe access) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM26	51	Policy SA18	<p>Policy SA18 – Land to the Rear of Rowe Hall</p> <p>Allocated for: Extra Care Accommodation (Class C2) comprising 96 self contained apartments, staff and communal facilities.</p> <p>Site Area: 1.237ha</p> <p>Planning history: Outline Planning Application Granted June 2024 Reference: EP23/00633/CMA</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p>	Use class reference removed, part a and e modified to address site specific vehicular access and transport needs, part b modified to improve clarity on access arrangements and parking provision. Modified c and new part f. All of the above	No. This change introduces no further LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from the Salisbury Road.</p> <p>Provide a revised Scouts Hut curtilage to include a new <u>parking</u> amenity area <u>incorporating the shared access way</u>.</p> <p>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. and site specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>Maximise the retention and safeguarding of existing mature trees within the site and incorporate those features in a coherent landscaping strategy for the site.</p> <p><u>Facilitate access to public transport including bus or other public transport services including facilities that encourage public transport use.</u></p> <p><u>Undertake and submit an appropriate desk-based assessment and written scheme of investigation due to the site's location within an Area of High Archaeological Potential.</u></p>	changes necessary for effectiveness of the policy	
MM27	52	Policy SA19	<p>Policy SA19 – 7 Station Approach</p> <p>Allocated for: Approximately A minimum of 5 8 dwellings (C3)</p> <p>Site Area: 0.04ha</p> <p>Planning history: <u>Application reference 21/01156/FUL Redevelopment to provide 43 residential units (Class C3) within a part 3, part 4 storey building (refused) 25/00404/FUL Mixed use redevelopment for commercial units and 9 residential units (permitted)</u></p>	Modified to reflect number of units as a minimum of 8 necessary to ensure consistent with national policy and optimising density. Use class reference, addition of 'application reference' wording and updated application to latest permission, part	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect an increased site number is in-keeping with the

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site. Design surface and foul water drainage to include all required measures arising from the site being located in a Groundwater Source Protection Zone <u>3</u> .	a) addressing site specific vehicular access and transport needs, part b added Groundwater Source Protection Zone number, all changes necessary for effectiveness	findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM28	53	Policy SA20	<p>Policy SA20 – Esso Express, 26 Reigate Road</p> <p>Allocated for: Approximately <u>A minimum of</u> 10 dwellings (C3)</p> <p>Site Area: 0.25ha</p> <p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate; i) vehicle, pedestrian and cycle access <u>from the Ewell By-Pass</u>. ii) <u>pedestrian and cycle access from Reigate Road</u>.</p> <p>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>Ensure the site layout maximises retention and safeguarding of mature existing trees, incorporating these in a coherent landscaping strategy for the site.</p>	Modified to reflect number of units as a minimum of 10 necessary to ensure consistent with national policy and optimising density. Use class reference, part a to provide clarity as to where access is to be achieved from, part d amendment to reference correct policy. Necessary changes made for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis upon safe access) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Undertake archaeological investigations in accordance with Policy DM1345, taking account of the site's location within an Area of High Archaeological Potential.		site integrity are foreseen.
MM29	54	Policy SA21	<p>Policy SA21 – Richards Field Car Park</p> <p>Allocated for: Approximately <u>A minimum of 7 dwellings and the retention of a minimum of 7 public car parking spaces.</u></p> <p>Site Area: 0.07ha</p> <p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Chessington Road.</p> <p>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p>	Modified to reflect the number of units as a minimum of 7 necessary to ensure consistent with national policy and optimising density. Amendment to the allocation to specify the retention of some parking on the site. Part a addressing site specific vehicular access and transport needs modified for clarity, Necessary changes made for effectiveness of the policy	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number, alongside the retention of public car parking spaces, is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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MM30	55	Policy SA22	<p>Policy SA22 – Etwelle House, Station Road</p> <p>Allocated for: Approximately <u>A minimum of</u> 20 dwellings (C3)</p> <p>Site Area: 0.2ha</p> <p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Station Approach <u>whilst ensuring the safety of users of the adjoining railway station.</u></p> <p>Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.</p> <p>Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining railway station and railway line.</p>	Modified to reflect the number of units as a minimum of 20 necessary to ensure consistent with national policy and optimising density. Use class reference removed, part a addressing site specific vehicular access and added reference to adjoining railway station. Necessary changes made for clarity and effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis upon safe associated transport usage) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM31	56	Policy SA23	<p>Policy SA23 – 140-142 Ruxley Lane</p> <p>Allocated for: Approximately 12 dwellings (C3)</p> <p>Site Area: 0.2ha</p> <p>Planning history: 23/00588/FUL – Redevelopment into 14 dwellings (Granted)</p>	Policy deleted as the site is almost complete	No. Policy deletion introduces no new LSEs that may compromise European site integrity.

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			In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide appropriate vehicle, pedestrian and cycle access from Ruxley Lane. b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. c) Ensure the site layout maximises retention and safeguarding of mature existing trees, incorporating these in a coherent landscaping strategy for the site.		
MM32	57	Policy SA24	<p>Policy SA24 – Garages at Somerset Close & Westmorland Close</p> <p>Allocated for: Approximately <u>A minimum of</u> 6 dwellings (C3)</p> <p>Site Area: 0.10ha</p> <p>Planning history: Multiple applications for the redevelopment of garages to 6 flats (20/01758/FUL – 20/01760/FUL <u>Application references: 23/00188/FUL, 23/00192/FUL & 23/00193/FUL</u> (refused))</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access <u>from Somerset Close and Westmorland Close</u>.</p> <p>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p>	Modified to reflect the number of units as a minimum of 6 necessary to ensure consistent with national policy and optimising density. Use class reference removed, addition of 'application reference' wording. Amendment to correct planning applications references, part a addressing site specific vehicular access and transport needs, necessary for clarity and effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis on safe associated transport usage) is in-keeping with the findings of the Addendum Report and no further LSEs that may

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
					compromise European site integrity are foreseen.
MM33	58	Policy SA25	<p>Policy SA25 – 64 South Street Epsom</p> <p>Allocated for: Approximately <u>A minimum of</u> 10 dwellings</p> <p>Site Area: 0.14ha</p> <p>Planning history: <u>Application reference</u> 20/00041/FUL - COU from B1 to 6 dwellings (lapsed)</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide <u>safe and</u> appropriate:</p> <p>i) vehicle, pedestrian and cycle access <u>from Saint Margaret Drive;</u></p> <p>ii) <u>pedestrian and cycle access</u> from South Street (A24).</p> <p>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>Design surface and foul water drainage to include all required measures arising from the site being located in <u>Groundwater</u> Source Protection Zone 1.</p> <p>Undertake archaeological investigations in accordance with Policy DM1345, taking account of the site's location within an Area of High Archaeological Potential.</p>	<p>Capacity revised and reflected as a minimum necessary to ensure consistent with national policy and optimising density.. Addition of 'application reference' wording.</p> <p>Part a addressing site specific vehicular access and transport needs, part c addition of 'groundwater', part d amendment to reference correct policy. Part e Additional text all necessary for the policy to be effective</p>	<p>No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis on safe associated transport usage) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.</p>

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Conserve and, where possible, or enhance the setting of the Woodcote Conservation Area and the adjacent Grade II listed Abel Cottages <u>through sensitive design incorporating positive elements of local character and appearance.</u>		
MM34	59	Policy SA26	<p>Policy SA26 – 35 Alexandra Road</p> <p>Allocated for: Approximately <u>A minimum of</u> 8 dwellings (C3)</p> <p>Site Area: 0.10ha</p> <p>Planning history: <u>Application reference: 21/01920/FUL</u> - 9 flats (withdrawn)</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide appropriate <u>and safe</u> vehicle, pedestrian and cycle access to the site <u>from Alexandra Road.</u></p> <p>Ensure the site layout maximises retention and safeguarding of mature existing trees, including the tree covered by a Tree Preservation Order, incorporating these in a coherent landscaping strategy for the site.</p> <p>Design surface and foul water drainage to include all required measures arising from the site being located in <u>Groundwater</u> Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.</p>	Modified to reflect the number of units as a minimum of 8 necessary to ensure consistent with national policy and optimising density. Use class reference removed, addition of 'application reference' wording, part a amendment to reference the road access is to be achieved from, part c addition of 'Groundwater' and removal of reference to policy S16, all changes necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis on safe associated transport usage) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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MM35	60	Policy SA27	<p>Policy SA27 – 22-24 Dorking Road</p> <p>Allocated for: Approximately <u>A minimum of</u> 18 dwellings</p> <p>Site Area: 0.12ha</p> <p>Planning history: <u>Application reference:</u> 19/01365/FUL - Demolition and erection of 20 flats (refused)</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Dorking Road <u>and/</u> or White Horse Drive.</p> <p>Conserve and, where possible <u>or</u> enhance the setting of the Grade II* and Grade II listed buildings in close proximity to the site <u>through sensitive design incorporating positive elements of local character and appearance.</u></p>	Modified to reflect the number of units as a minimum of 18 necessary to ensure consistent with national policy and optimising density. Addition of 'application reference' wording. Part a addressing site specific vehicular access and transport needs modified for clarity, part b additional text regarding design, all necessary effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis on safe associated transport usage) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM36	61	Policy SA28	<p>Policy SA28 – 63 Dorking Road</p> <p>Allocated for: <u>A minimum of</u> 6 dwellings (C3) Specialist Care Home (C2) with ancillary nurses accommodation (equivalent to 6 net C3 dwellings)</p> <p>Site Area: 0.14ha</p>	Modified to reflect the number of units as a minimum of 6 necessary to ensure consistent with national policy and optimising	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Hylands Mews.</p> <p><u>Retain and convert</u> Conserve and enhance the part of the building that is Grade II Listed.</p> <p>Conserve <u>or and</u> enhance the setting of the Grade II Listed buildings adjoining the site <u>through sensitive design incorporating positive elements of local character and appearance</u>.</p>	<p>density. Allocate for general residential use. Use class reference removed, part) addressing site specific vehicular access and transport needs modified, part b To specify that the existing structure is to be retained and converted and additional design related text at part c all necessary for effectiveness</p>	<p>integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis on safe associated transport usage) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.</p>
MM37	62	Policy SA29	<p>Policy SA29 – 65 London Road</p> <p>Allocated for: Care home up to 81 bedrooms (use class C2) Site Area: 0.30ha</p> <p>Planning history: 23/00817/FUL (approved, but not implemented), 22/00728/FUL (approved, but not implemented) and 20/01079/FUL (approved, but not implemented)</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p>	<p>Policy deleted as permission being implemented</p>	<p>No. Policy deletion introduces no new LSEs that may compromise European site integrity.</p>

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>a) Provide appropriate vehicle, pedestrian and cycle access to the site from London Road.</p> <p>b) Design surface and foul water drainage to include all required measures arising from the site being located in Source Protection Zone 2, as well as meeting the requirements for sustainable drainage in Policy S16.</p> <p>c) Conserve and, where possible, enhance the setting of the Grade II listed buildings in close proximity to the site.</p>		
MM38	63	Policy SA30	<p>Policy SA30 – Epsom General Hospital</p> <p>Allocated for: A minimum of approximately 305 units older people's accommodation (Use Class C2), 24 key worker dwellings (C3) and community uses, a children's nursery (Use Class E)</p> <p>Site Area: 1.45ha</p> <p>Planning history: <u>Application reference:</u> 21/00252/FUL (granted at appeal, development commenced), 20/00108/FUL (approved) and 19/01722/FUL (refused)</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Woodcote Green Road.</p> <p><u>b) Provide offsite highway improvements:</u></p> <p><u>i) along Woodcote Green Road to improve safety and public transport infrastructure</u></p>	Capacity expressed as a minimum, necessary to ensure consistent with national policy and optimising density. Use classes removed, part a addressing site specific vehicular access and transport needs, part c new wording to specifically reference highway improvements and bus infrastructure. All necessary for the policy to be effective	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside density optimisation, details on transport needs, and removal of use class reference) is in-keeping with the findings of the

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p><u>ii) along Dorking Road to improve public transport infrastructure</u></p> <p>bc) Satisfy the requirements for sustainable drainage in Policy S16.</p>		Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM39	64	Policy SA31	<p>Policy SA31 – Land at West Park Hospital (South)</p> <p>Allocated for: Approximately <u>A minimum of 50 dwellings (C3)</u></p> <p>Site Area: 1.81ha</p> <p>Planning history: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>from Richmond Crescent.</u></p> <p>b) <u>Establish a legal mechanism to secure or enhance service frequency of bus services operating in the vicinity of the site to ensure connectivity to the wider area.</u></p> <p>bc) Establish a legal mechanism for long term management of green infrastructure, providing access for recreational purposes by the general public as well as residents of the development.</p> <p>ed) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p>	Modified to reflect the number of units as a minimum of 50 necessary to ensure consistent with national policy and optimising density. Remove use class reference, amend part a addressing site specific vehicular access and transport needs modified for clarity, amendment part c,d and g all necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside density optimisation, details on transport needs, and removal of use class reference) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>d)e) Conserve and, where possible, or enhance the setting of the West Park Conservation Area <u>through sensitive design incorporating positive elements of local character and appearance.</u></p> <p>e)f) Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees, incorporating these in a coherent landscaping strategy for the site.</p> <p>f)g) Undertake archaeological investigations in accordance with Policy DM1345, taking account of the site's location within an Area of High Archaeological Potential.</p>		
MM40	65	Policy SA32	<p>Policy SA32- Land at West Park Hospital (North)</p> <p>Allocated for: Approximately <u>A minimum of 1850 dwellings (C3)</u></p> <p>Site Area: 5.22 ha</p> <p>Planning History: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>from the existing hospital access road. and enable the site to be served by public transport</u></p> <p>b) <u>Establish a legal mechanism to secure or enhance service frequency of bus services operating in the vicinity of the site to ensure connectivity to the wider area</u></p>	Modified to reflect the number of units as a minimum of 180 necessary to ensure consistent with national policy and optimising density. Use class reference removed, part a addressing site specific vehicular access and transport modified, part b wording to specifically reference bus infrastructure, part e amended to reference the water tower, part g amendment to reference correct	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside density optimisation, details on infrastructure needs, and removal of use class reference) is in-keeping with the findings of the Addendum Report and no further LSEs that may

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>bc) Provide permeability through the site for pedestrians and cyclists into and from development to provide connectivity between adjoining residential areas and Horton County Park.</p> <p>ed) Establish a legal mechanism for long term management of green infrastructure, providing access for recreational purposes by the general public as well as residents of the development.</p> <p>de) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>ef) Conserve and, where possible, or enhance the setting of the West Park Conservation Area <u>and Grade II listed water tower</u> that lies to the south of the site <u>through sensitive design incorporating positive elements of local character and appearance.</u></p> <p>fg) Ensure that site layout that retains and safeguards existing mature trees as part of a coherent landscaping strategy for the site.</p> <p>gh) Undertake archaeological investigations in accordance with policy DM1345, taking account of the site's location within an Area of High Archaeological Potential</p>	policy. All necessary for the policy to be positively prepared and effective	compromise European site integrity are foreseen.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM41	66	Policy SA33	<p>Policy SA33- Land at Chantilly Way</p> <p>Allocated for: Approximately <u>A minimum of</u> 30 dwellings (C3)</p> <p>Site Area: 0.7 ha</p> <p>Planning History: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Chantilly Way.</p> <p><u>b) Provide off site improvements to Chantilly Way to improve connectivity from the site to adjacent site allocation SA35 to improve access to bus services.</u></p> <p>b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>c) Conserve and, where possible, enhance the setting of Grade II Listed Horton Farm House that lies beyond the site boundary to the North West.</p> <p>d) Minimise the loss of existing trees, including appropriate root protection for those immediately adjacent to the site.</p> <p><u>e) Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.</u></p>	Modified to reflect number of units as a minimum of 30 dwellings necessary to ensure consistent with national policy and optimising density. Use class reference removed, part a addressing site specific vehicular access and part b additional criteria added to require public transport connectivity particularly bus infrastructure, removed criteria c reference to heritage asset, not relevant for this site, all changes necessary for effectiveness of the policy	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside density optimisation, details on transport needs, and removal of use class reference) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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MM42	67	Policy SA34	<p>Policy SA34- Hook Road Arena</p> <p>Allocated for: New Sports Hub for <u>community use</u> in the borough to include playing pitches (grass and artificial), a new pavilion and changing facilities. The provision of <u>a minimum of approximately 100 dwellings</u> (C3) on the eastern part of the site.</p> <p>Site Area: 14 ha</p> <p>Planning History: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from the existing access on Hook Road.</p> <p>b) <u>Facilitate access to public transport including bus services operating within the vicinity of the site to ensure connectivity to the wider area.</u></p> <p>b)c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 strategic Flood Risk Assessment.</p> <p>e)d) Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees, incorporating these in a coherent landscaping strategy for the site.</p> <p>d)e) Achieves a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.</p> <p>f) <u>enter a community use agreement in relation to the use of the sports hub.</u></p>	Modified to reflect number of units as a minimum necessary to ensure consistent with national policy and optimising density. Use class reference removed, reference added to clarify that the intention is for the new sports hub to be for community use, amend part a addressing site specific vehicular access for clarity. All necessary to ensure the policy is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside density optimisation, details on transport needs, and removal of use class reference) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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MM43	68	Policy SA35	<p>Policy SA35 – Land at Horton Farm</p> <p>Allocated for: Approximately <u>A minimum of</u> 1,250 dwellings (C3) including some specialist housing and self-build plots, 10 gypsy and traveller pitches, business incubation space, community building and a public park of approximately 7ha in addition to other green and blue infrastructure.</p> <p>Site Area: 37.9 ha</p> <p>Planning History: None</p> <p>In addition to complying with the policies in the plan, any developer of this site will be required to:</p> <p>a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from <u>Chantilly Way and Horton Lane</u> and enable the site to be served by public transport</p> <p>b) <u>Establish a legal mechanism to secure bus services to serve the site in the long term, this should include the provision of supporting bus infrastructure including bus priority measures.</u></p> <p>bd) Provide permeability through the site for pedestrians and cyclists into and from the development to provide connectivity <u>within the site and to between</u> adjoining residential areas and associated facilities <u>including Horton Local Centre</u> and Horton County Park.</p> <p>ee) Provide a community building, capable of accommodating early years education provision and other community uses responding to the needs of the locality.</p> <p>df) Provide additional primary care capacity required to serve local needs. This could take the form of on-site provision integrated into a community building which</p>	<p>Modified to reflect the number of units as a minimum necessary to ensure consistent with national policy and optimising density. Use class reference removed, modified criteria a and b to ensure sustainable transport measures are adequately addressed and the policy is effective in this regard. Amend j to ensure it is positively prepared</p> <p>Changes necessary to ensure the policy is justified, effective and positively prepared</p>	<p>No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside density optimisation, details on infrastructure needs, and removal of use class reference) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.</p>

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			<p>accommodates primary health care provision alongside community health and wellbeing services required to meet the area's needs, or an equivalent financial contribution towards off-site provision of new or improvement to existing health facilities. The form of required additional primary care provision will be determined in consultation with the NHS at the time the site comes forward.</p> <p>eg) Provide a public park of approximately 7ha within the land to the North of the site incorporating walking, cycling routes, equestrian routes and measures for surface water management and biodiversity enhancement.</p> <p>fh) Establish a legal mechanism for long term management of green and blue infrastructure and children's play space on the site, providing access for recreational purposes by the general public as well as residents of the development.</p> <p>gi) Incorporate an area of approx. 0.6ha, with access to the highway and utilities connections, suitable for delivery of gypsy and traveller pitches (10 pitches).</p> <p>hj) The pitches will be public (tenure) forming part of the affordable housing contribution (1 pitch equates to 1 affordable home). Pitches should be serviced pitches, providing hard standing, amenity space and connections for drainage, electricity and water.</p> <p>ik) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>jl) Conserve and, where possible, or enhance the setting of Grade II Listed Horton Farm House <u>through sensitive design incorporating positive elements of local character and appearance.</u></p> <p>km) Ensure the site layout retains and protects veteran trees and maximises retention and safeguarding of other existing mature trees and hedgerows as part of a coherent landscaping strategy for the site.</p>		

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			<p>4n) Achieves a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.</p>		
MM44	n/a	New site allocation SA36	<p><u>Policy SA36 – 25 Alexandra Road, Epsom</u></p> <p><u>Allocated for:</u> A minimum of 10 dwellings</p> <p><u>Site Area:</u> 0.2ha</p> <p><u>Planning history:</u> Application references 16/00653/OUT, 16/00595/FUL & 16/00482/OUT (all approved)</p>  <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <p><u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Alexandra Road.</u></p> <p><u>Maximise the retention and safeguarding of TPO mature trees within the site and incorporate those features in a coherent landscaping strategy for the site.</u></p> <p><u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u></p>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.

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			<u>Ensure the re-use the stained-glass window from the locally listed building located on the site in any future development proposals, in accordance with the previous planning approvals for the site.</u>		
MM45	n/a	New site allocation SA37	<p><u>Policy SA37 – Gainsborough Road estate, Epsom</u></p> <p><u>Allocated for:</u> A minimum of 8 dwellings</p> <p><u>Site Area:</u> 0.26 ha</p> <p><u>Planning history:</u> None</p>   <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <p>a) <u>Provide safe and appropriate:</u></p> <p>i) <u>vehicle, pedestrian and cycle access to the East parcel from Harvester Road</u></p> <p>ii) <u>vehicle, pedestrian and cycle access to the West parcel from Gainsborough Road.</u></p>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.

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			<u>b) Maximise the retention and safeguarding of TPO mature trees within and near the West parcel and incorporate those features in a coherent landscaping strategy for the site parcels.</u>		
MM46	n/a	New site allocation SA38	<p><u>Policy SA38 – Parking at 54 Gainsborough Road</u></p> <p><u>Allocated for:</u> A minimum of 6 dwellings</p> <p><u>Site Area:</u> 0.10 ha</p> <p><u>Planning history:</u> Pre-application</p> <div style="display: flex; align-items: center;">   <div style="margin-left: 10px;"> <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <p><u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Gainsborough Road.</u></p> </div> </div>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.
MM47	n/a	New site allocation SA39	<p><u>Policy SA39 – 85b Hook Road, Epsom</u></p> <p><u>Allocated for:</u> A minimum of 8 dwellings</p> <p><u>Site Area:</u> 0.14 ha</p>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA

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			<p>Planning history: None</p>  <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <p><u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Hook Road.</u></p> <p><u>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</u></p> <p><u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u></p>		Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.
MM48	n/a	New site allocation SA40	<p><u>Policy SA40 – Land west of Ewell By-Pass</u></p> <p><u>Allocated for:</u> A minimum of 38 dwellings</p> <p><u>Site Area:</u> 0.87 ha</p>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the

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			<p><u>Planning history: None</u></p> <div>   </div> <p><u>In addition to complying with the policies in the plan, any developer of this site will be required</u></p> <p><u>to:</u></p> <p><u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from both Cheam Road to the south-west and Ewell By-Pass in the north-east.</u></p> <p><u>Maintain and enhance the footpath along the western edge of the site</u></p> <p><u>Ensure the site layout maximises retention and safeguarding of mature trees, incorporating these in a coherent landscaping strategy for the site.</u></p> <p><u>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</u></p> <p><u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u></p> <p><u>Conserve or enhance the significance and setting of the Ewell Village Conservation Area through sensitive design incorporating positive elements of local character and appearance.</u></p>		conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.
MM49	n/a	New site allocation SA41	<u>Policy SA41 – Conservative Club, Epsom Club and Church</u>	Additional allocation to ensure the plan is	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p><u>Allocated for:</u> Mixed use development for community uses (approximately 1,800sqm) and a minimum of 28 dwellings</p> <p><u>Site Area:</u> 0.35 ha</p> <p><u>Planning history:</u> No residential planning history</p> <div data-bbox="595 606 1344 871">  <p><u>In addition to complying with the policies in the plan,</u></p> <p><u>any developer of this site will be required to:</u></p> <p><u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Church Street.</u></p> <p><u>Provide permeability through the site for pedestrians and cyclists and provide connections to the adjoining site allocation SA9 – Depot Road and Upper High Street Car Park.</u></p> <p><u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u></p> <p><u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u></p> <p><u>Maximise the retention and safeguarding of the protected mature tree within the site and incorporate this feature in a coherent landscaping strategy for the site.</u></p> </div>	positively prepared and effective	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Conserve or enhance the setting of the Church Street Conservation Area and Listed Building that adjoin the site, through sensitive design incorporating positive elements of local character and appearance.</u>		
MM50	n/a	New site allocation SA42	<p><u>Policy SA42 – TK Maxx</u></p> <p><u>Allocated for:</u> Mixed use development to provide retail and leisure uses (approx. 3,750 sqm) and a minimum of 17 dwellings</p> <p><u>Site Area:</u> 0.14 ha</p> <p><u>Planning history:</u> None</p> <div style="display: flex; align-items: center;">   <div style="margin-left: 10px;"> <p><u>In addition to complying with the policies in the plan, any developer</u></p> </div> </div> <p><u>of this site will be required to:</u></p> <p><u>a) Provide safe and appropriate:</u></p> <p><u>i) pedestrian and cycle access to the site from Epsom High Street;</u></p> <p><u>ii) vehicle, pedestrian and cycle access from Station Approach.</u></p> <p><u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential</u></p> <p><u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u></p>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.

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			<p><u>Retain active ground floor retail frontages along the parts of the site that front the High Street and form part of the Primary Shopping Area for the Town Centre.</u></p> <p><u>Consider the site's prominent Town Centre location for a high-quality designed building.</u></p> <p><u>Conserve or enhance the setting and significance of the Epsom Town Centre conservation area and nearby listed buildings, through sensitive design incorporating positive elements of local character and appearance.</u></p> <p><u>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</u></p>		
MM51	n/a	New site allocation SA43	<p><u>Policy SA43 – Land R/O The Albion Public House (Mccaffertys Bar)</u></p> <p><u>Allocated for:</u> Mixed use development, a minimum of 11 dwellings and approximately 500sqm commercial, business or service floorspace</p> <p><u>Site Area:</u> 0.14 ha</p> <p><u>Planning history:</u> None</p> <div data-bbox="577 1080 952 1348" data-label="Image"> </div> <div data-bbox="952 1080 1328 1348" data-label="Image"> </div> <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p><u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from South Street.</u></p> <p><u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u></p> <p><u>Conserve or enhance the setting and significance of the Epsom Town Centre Conservation Area and the adjacent and nearby Listed Buildings through sensitive design incorporating positive elements of local character and appearance.</u></p> <p><u>Retention of the Grade II listed wall that forms part of the site boundary.</u></p> <p><u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u></p>		
MM52	n/a	New site allocation SA44	<p><u>Policy SA44 – Spread Eagle Shopping Centre</u></p> <p><u>Allocated for:</u> Mixed use development to provide retail and leisure uses (approximately 2,000sqm) and student accommodation (a minimum of 40 units)</p> <p><u>Site Area:</u> 0.18 ha</p> <p><u>Planning history:</u> Pre-application</p> <div style="display: flex; align-items: center;">   <div style="margin-left: 10px;"> <p><u>In addition to complying with the policies in the plan, any developer of this site will</u></p> </div> </div> <p><u>be required to:</u></p>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European

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			<p><u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Council owned car park and Town Hall to the east of site. Provide or maintain pedestrian access to the site from High Street, Ashley Road and/or The Parade.</u></p> <p><u>Retain active ground floor retail frontages along the parts of the site that front The Parade, Ashley Road and High Street and form part of the Primary Shopping Area for the Town Centre.</u></p> <p><u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u></p> <p><u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u></p> <p><u>Conserve or enhance the setting and significance of the Epsom Town Centre Conservation Area and the Grade II listed 'Spread Eagle Hotel' and 'No 89 High Street' located within the site through sensitive design incorporating positive elements of local character and appearance.</u></p> <p><u>Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the A24 and neighbouring uses.</u></p> <p><u>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</u></p>		site integrity are foreseen.
MM53	n/a	New site allocation SA45	<p><u>Policy SA45 – Auction House, Depot Road</u></p> <p><u>Allocated for:</u> Mixed use development to provide commercial, business and service floorspace (approximately 500sqm) and a minimum of 10 dwellings</p> <p><u>Site Area:</u> 0.12 ha</p> <p><u>Planning history:</u> None</p>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the

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			 <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <p><u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Depot Road.</u></p> <p><u>Provide permeability through the site for pedestrians and cyclists and provide connections into the adjoining site allocation SA9 – Depot Road and Upper High Street Car Park.</u></p> <p><u>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</u></p> <p><u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u></p>		integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.
MM54	n/a	New site allocation SA46	<p><u>Policy SA46 – Laine Theatre Arts</u></p> <p><u>Allocated for:</u> A minimum of 6 dwellings</p> <p><u>Site Area:</u> 0.05 ha</p> <p><u>Planning history:</u> None</p>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the

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			  <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <p><u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from East Street.</u></p> <p><u>Conserve or enhance the setting of nearby heritage assets, including the adjacent Adelphi Road Conservation Area and the Grade II listed building (Flint Cottage), through sensitive design incorporating positive elements of local character and appearance.</u></p> <p><u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u></p> <p><u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u></p>		integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.
MM55	n/a	New site allocation SA47	<p><u>Policy SA47 – Eclipse Business Park, West Hill</u></p> <p><u>Allocated for:</u> Mixed use development to provide commercial, business and service floorspace (approximately 1,500sqm) and a minimum of 23 dwellings</p> <p><u>Site Area:</u> 0.39 ha</p>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the

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			<p><u>Planning history:</u> Historic application for 30 flats</p> <div>   </div> <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <p><u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from West Hill.</u></p> <p><u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u></p> <p><u>Conserve or enhance the setting and significance of the Stamford Conservation Area which covers part of the site, through sensitive design incorporating positive elements of local character and appearance.</u></p>		integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.
MM56	n/a	New site allocation SA48	<p><u>Policy SA48 – Cuddington Glade</u></p> <p><u>Allocated for:</u> Residential Care Home providing at least 70 bedrooms</p> <p><u>Site Area:</u> 0.52 ha</p>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European

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			<p>Planning history: Application reference 26/00002/FUL (awaiting determination)</p> <p>In addition to complying with the policies in the plan, any developer of this site will</p> <div>   </div> <p>be required to:</p> <p>Provide safe and appropriate vehicle, pedestrian and cycle</p> <p>access to the site from Cherry Tree Lane bordering the western boundary of the site.</p> <p>Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees both within and beyond the site boundary, incorporating these in a coherent landscaping strategy for the site.</p> <p>Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.</p>		<p>sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.</p>
MM57	n/a	New site allocation SA49	<p>Policy SA49 – Land off Cuddington Glade</p> <p>Allocated for: Minimum of 45 dwellings</p> <p>Site Area: 1.11 ha</p>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European

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			<p><u>Planning history: None</u></p> <div>   <p>In addition to complying with the policies in the plan, any developer</p> </div> <p><u>of this site will be required to:</u></p> <p><u>Provide safe and appropriate:</u></p> <p><u>vehicle, pedestrian and cycle access to the site from Cuddington Glade that does not result in the loss of any existing parking provision to serve the established residential dwellings that adjoin the site;</u></p> <p><u>pedestrian and cycle access to the site from the established footpath bordering the site to the North.</u></p> <p><u>Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees, incorporating these in a coherent landscaping strategy for the site.</u></p> <p><u>Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.</u></p>		<p>sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.</p>
MM58	n/a	New site allocation SA50	<u>Policy SA50 – Land at Priest Hill</u>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered

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			<p><u>Allocated for:</u> Residential-led mixed use development for a minimum of 275 dwellings, commercial and/or community uses (approximately 1,000 sqm) along with a landscaped station square</p> <p><u>Site Area:</u> 4.71ha</p> <p><u>Planning history:</u> Pre application (up to 530 dwellings, commercial floorspace, public open space)</p> <div data-bbox="582 622 954 885" data-label="Image"> </div> <div data-bbox="972 622 1344 885" data-label="Image"> </div> <p><u>In addition to complying with the policies in the plan, any</u></p> <p><u>developer of this site will be required to:</u></p> <p><u>Provide safe and appropriate:</u></p> <p><u>vehicle, pedestrian and cycle access to the site from Cheam Road and Banstead Road;</u></p> <p><u>pedestrian and cycle access to Ewell East Station and pedestrian access to the other established public rights of way adjoining the site.</u></p> <p><u>Provide permeability through the site for pedestrians and cyclists into and from the development to provide connectivity between adjoining residential areas, education institutions and Ewell East Station.</u></p>		<p>by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.</p>

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			<p><u>Maintain vehicular access for neighbouring users including NESCOL, the neighbouring sports pitches operated by SEFRC and residential properties fronting Cheam Road.</u></p> <p><u>Provide off-site highway improvements along the Cheam Road Corridor and A24 junction to improve pedestrian and cycle infrastructure with a focus on reducing severance and improving safety & crossing opportunities.</u></p> <p><u>Provide off-site improvements to the public rights of way that run adjacent to the railway line connecting Cheam Road and Reigate Road.</u></p> <p><u>Provide financial contributions towards accessibility improvements at Ewell East Station.</u></p> <p><u>Provide commercial and/or community uses (approximately 1,000 sqm) to provide a new community hub adjacent to the Ewell East Station to serve existing and future residents and station users.</u></p> <p><u>Provide additional primary care capacity required to serve local needs. This could take the form of on-site provision integrated into a community building which accommodates primary health care provision alongside community health and wellbeing services required to meet the area's needs, or an equivalent financial contribution towards off-site provision of new or improvement to existing health facilities. The form of required additional primary care provision will be determined in consultation with the NHS at the time the site comes forward.</u></p> <p><u>The occupation of the development should be phased to align with the delivery of any necessary upgrades to water supply and waste water infrastructure.</u></p> <p><u>Establish a legal mechanism for long term management of green and blue infrastructure and children's play space on the site, providing access for recreational purposes by the general public as well as residents of the development.</u></p> <p><u>Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.</u></p>		

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MM59	n/a	New site allocation SA51	<p><u>Policy SA51 – Downs Farm</u></p> <p><u>Allocated for:</u></p> <p><u>Land to the North of College Road:</u> <u>A minimum of 530 dwellings, employment hub, specialist school provision (up to 2.5ha) and public open space</u></p> <p><u>Land to the South of College Road:</u> <u>Public open space with improved pedestrian and cycle connectivity to Epsom Downs Station and playing pitches and supporting facilities.</u></p> <p><u>Site Area:</u> 27.66 ha (north), 17.92 ha (south)</p> <p><u>Planning history:</u> None</p> <div data-bbox="584 850 954 1098" data-label="Image"> </div> <div data-bbox="969 850 1339 1098" data-label="Image"> </div> <p><u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u></p> <p><u>Land to the North of College Road</u></p> <p><u>Provide safe and appropriate:</u> <u>vehicle, pedestrian and cycle access to the site from Reigate Road;</u></p>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.

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			<p><u>pedestrian and cycle access to the site from Longdown Lane and College Road.</u></p> <p><u>Establish a legal mechanism to secure frequent bus services to serve the site in the long term and provide supporting infrastructure including bus priority measures where feasible.</u></p> <p><u>Provide permeability through the site for pedestrians and cyclists to provide connectivity between adjoining residential areas and the open space at land to the South of College Road to the south of the site.</u></p> <p><u>Provide offsite highway improvements along Reigate Road and College Road to improve pedestrian and cycle infrastructure with a focus on improving safety and improving crossing opportunities.</u></p> <p><u>Provide financial contributions towards improvements at Epsom Downs Station.</u></p> <p><u>Conserve or enhance the setting of the Higher Green / Longdown Lane Conservation Area that lies to the north of the site and listed buildings located in close proximity to the site, through sensitive design incorporating positive elements of local character and appearance.</u></p> <p><u>Ensure the site layout maximises retention and safeguarding of trees covered by Tree Preservation Orders and other existing trees, incorporating these in a coherent landscaping strategy for the site.</u></p> <p><u>Provision of a new specialist school of up to 2.5ha on the site.</u></p> <p><u>The occupation of the development should be phased to align with the delivery of any necessary upgrades to water supply and waste water infrastructure.</u></p> <p><u>Provide suitable noise and vibration attenuation measures to ensure that future occupiers have an acceptable level of residential amenity given the existing adjoining business.</u></p>		

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			<p><u>Provide additional primary care capacity required to serve local needs. This could take the form of on-site provision integrated into a community building which accommodates primary health care provision alongside community health and wellbeing services required to meet the area's needs, or an equivalent financial contribution towards off-site provision of new or improvement to existing health facilities. The form of required additional primary care provision will be determined in consultation with the NHS at the time the site comes forward.</u></p> <p><u>Establish a legal mechanism for the long term management of green and blue infrastructure and children's play space on the site, providing access for recreational purposes by the general public as well as residents of the development.</u></p> <p><u>Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.</u></p> <p><u>Land to the South of College Road</u></p> <p><u>Provide public open space incorporating walking and cycling routes providing connections between College Road, Longdown Lane South and Epsom Downs Station.</u></p> <p><u>Provide playing pitches and new supporting infrastructure including changing facilities that are served by utilities and car parking for users. Vehicular access should be secured from improvements to the existing access along College Road.</u></p>		
MM60	70	Para. 5.3.	<p>5.3. Table S5a below sets out the recommended mix of affordable and market homes for future developments in the borough over the Local Plan Period as set out in the HEDNA (Source: HEDNA, 2023, Table 66, p257).</p> <p><i>Move table S5a into main body of text as below:</i></p>	<p>Added source/reference to HEDNA table, necessary for effectiveness</p> <p>Table S5a concerning housing mix moved to</p>	No. The change does not introduce any new LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?																				
				the policy wording for effectiveness																					
MM61	70	Policy S5	<p>Policy S5: Housing mix and type</p> <p>Residential development will be permitted where the following criteria are met: a) The mix of tenure, type and size reflects have regard to the housing need, set out in the Housing and Economic Development Needs Assessment (2023) as detailed below, unless the applicant can demonstrate that other factors, such as site characteristics, local character and local housing need warrant an alternative approach, or any subsequent update; and b) The housing mix has regard to the size, characteristics and location of the site.</p> <p>Table S5a:Housing Mix</p> <table><tr><td>Tenure</td><td>1-bedroom</td><td>2-bedrooms</td><td>3-bedrooms</td><td>4+ bedrooms</td></tr><tr><td>Market</td><td>10%</td><td>35%</td><td>35%</td><td>20%</td></tr><tr><td>Affordable home ownership</td><td>20%</td><td>40%</td><td>30%</td><td>10%</td></tr><tr><td>Affordable housing (rented)</td><td>40%</td><td>35%</td><td>20%</td><td>5%</td></tr></table> <p><u>Key supporting documents</u></p>	Tenure	1-bedroom	2-bedrooms	3-bedrooms	4+ bedrooms	Market	10%	35%	35%	20%	Affordable home ownership	20%	40%	30%	10%	Affordable housing (rented)	40%	35%	20%	5%	<p>It is necessary for effectiveness for the policy to specify the Housing Mix, the table S5 has been moved from the supporting text into the policy for effectiveness</p> <p>It is necessary for effectiveness to clarify criteria a and b. These have been combined and reworded</p> <p>New key supporting documents section</p>	No. The change does not introduce any new LSEs that may compromise European site integrity.
Tenure	1-bedroom	2-bedrooms	3-bedrooms	4+ bedrooms																					
Market	10%	35%	35%	20%																					
Affordable home ownership	20%	40%	30%	10%																					
Affordable housing (rented)	40%	35%	20%	5%																					

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			<u>Housing and Economic Development Needs Assessment (2023)</u>	added after Policy S5 necessary for effectiveness	
MM62	71-72	Policy S6	<p>5.5. Housing affordability is a significant issue for Epsom and Ewell and is a key priority for the council. To help address the problem of affordability, the council is committed to enabling the provision of affordable housing for local people who cannot meet their housing needs on the open market. <u>Affordable housing may also include housing that is for essential local workers, which includes public sector employees such as NHS teaching staff. A full definition of affordable housing and essential local workers is provided in the glossary.</u></p> <p><i>New paragraphs inserted after para 5.7.</i></p> <p><u>The policy requires varying levels of affordable housing provision at an overall percentage of dependent upon the location of the development and the use of the land to be developed as defined within the policy.</u></p> <p>5.14. Affordable homes must be integrated within proposed developments to help build and maintain balanced and mixed communities. However, the feasibility of managing and maintaining the affordable homes will also be given consideration when assessing the acceptability of their siting and distribution. <u>An example of where the Council may consider it appropriate to 'cluster' affordable dwellings together would be for flatted schemes where a registered provider would benefit from the affordable dwellings being located together for management and maintenance reasons.</u></p>	<p>It is necessary for effectiveness that reference has been added to staff accommodation and essential local workers housing</p> <p>Additional supporting text necessary for effectiveness to set out how affordable housing on site should be distributed</p> <p>Modification necessary to correct policy title to</p>	No. Provision of affordable housing does not give rise to new air quality, hydrological, recreational or urbanisation effect impact pathways that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>5.17. Policy S2 Sustainable and Viable development provides further detail on the approach the council will take in cases where development proposals are not fully policy compliant.</p> <p>Vacant building credit</p> <p>5.18. Vacant building credit, as described in national planning guidance, will be applied to developments where a vacant building is either converted or demolished and may result in a reduction in the required affordable housing. The credit does not apply when a building has been abandoned.</p> <p>Policy S6: Affordable Housing</p> <p>1) The council will require proposals to provide affordable homes on all residential developments comprising self-contained units, as follows:</p> <p>On greenfield sites</p> <p><u>On site allocations SA31, SA32, SA33, SA34, SA35, SA48, SA49, SA50, SA51 as defined on the policies map and on any green belt sites developed for housing in accordance with national policy:</u></p>	<p>ensure policy is positively prepared</p> <p>Delete as repeats national policy</p> <p>It is necessary for the policy to be modified to include text to specify the amount of affordable housing required on the site allocations contained within this plan and greenfield sites in order to be consistent with national policy. Whilst it is not envisaged that any other development on green belt sites would come forward, the text is necessary to reflect the affordable housing expectations</p>	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>a) Schemes of 10 or more new units or where the site has an area of 0.5 hectares or more, on-site provision of at least <u>45</u>0% affordable housing of the gross number of dwellings;</p> <p>On greenfield sites <u>located within the defined urban area as identified on the policies map:</u></p> <p><u>a)b) Schemes 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;</u></p> <p>On all other sites</p> <p><u>b)c) Schemes of 10 or more new dwellings 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;</u></p> <p>2) Where a development meets the criteria detailed in 1), the preferred mix for affordable housing provision on-site is as follows: 30% affordable home ownership; 70% affordable rented (with half to be secured as social rented)</p> <p>3) 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;</p>	<p>identified by the Framework</p> <p>Reworded point 4 to reflect supporting text and ensure policy is justified</p>	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>4) 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. <u>must be integrated within proposed developments to help build and maintain balanced and mixed communities. However, the feasibility of managing and maintaining the affordable homes will also be given consideration when assessing the acceptability of their siting and distribution;</u></p> <p>5) Affordable housing from proposals of 10 or more units shall be provided on-site. Only where it can be demonstrated that exceptional circumstances exist will provision for off-site provision be allowed or the payment of a financial contribution made (equivalent in value to it being provided on-site).</p> <p>6) <u>The affordable housing requirements set out in this policy have been demonstrated to be viable through our Local Plan Viability Assessment. Policy S2 Viable Development provides details on where a site specific viability assessment may be accepted at the application stage.</u></p> <p>6)7) Where a site has been sub-divided or is not being developed to its full potential, to circumvent the affordable housing thresholds detailed in criteria 1, 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.</p> <p>7) In accordance with Policy S2, viability will only be considered in exceptional circumstances and where there are significant additional costs not anticipated through the viability evidence that has informed the Local Plan.</p>	It is necessary for additional text to clarify viability evidence in order to be effective and consistent with national policy	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Key supporting documents Housing and Economic Development Needs Assessment (2023) Local Plan Viability Assessment (2023) <u>Local Plan Viability Update Note (2024)</u>	For effectiveness added viability evidence under 'key supporting documents'	
MM63	74-75	Policy DM1	<p>5.19. It is important that new homes are built to a high standard to meet the 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, climate change and pressure they put on water supply. As such, this policy should be read in conjunction with policy DM10 Building Efficiency <u>Emissions and Energy</u> Standards.</p> <p>Policy DM1: Residential Space Standards</p> <p>1) Proposals for new residential dwellings (Use Class C3) will be permitted where:</p> <p>a) the internal space complies with or exceeds the nationally described space standards or any future equivalent.</p> <p>b) the minimum requirements for private outdoor space as set out below are satisfied:</p> <p>i) a 5 sq m balcony within flatted development accessible from the main habitable room</p> <p>ii) a dedicated private garden for houses.</p>	<p>Necessary for effectiveness in terms of the name change to policy DM10</p> <p>Necessary for effectiveness to remove the use classes to future proof the policy</p>	No. The change does not introduce any new LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>Parts 2 and 3 (i) and (ii) of the policy remain the same</p> <p>Key supporting documents</p> <p>Technical housing standards nationally described space standards</p> <p><u>Statutory guidance - Technical housing standards- nationally described space standards</u></p> <p>Approved Document M – Access to and use of buildings Volume 1: dwellings</p> <p><u>Statutory guidance – Access to the use of Buildings- Approved Document M</u></p>	References to the documents are set out in full for effectiveness	
MM64	78-79	Policy S7	<p>5.31. Some housing may need to be designed for people with specialist needs. This includes older citizens, those with disabilities and , the neurodiverse, students or families more suited to multi-generational communal living.</p> <p>5.33. Evidence on how this translates to need for the required number of specialist homes or <u>care home</u> bed spaces for older people varies, notably between figures provided by Surrey County Council (SCC) and the calculations provided by the independent consultants who produced the HEDNA.</p> <p>5.34. SCC predicts an oversupply of market extra care units and a <u>minimum</u> need for 75446 affordable extra care units up to 2035. <u>With respect to care home provision, SCC predicts an undersupply of 185 residential care home beds and an undersupply of 149 nursing home beds, based upon operational care home provision as at January 2024. SCC publish up to date figures for need in their Commissioning Statement which should be considered at the time of submitting a planning application, and 355 nursing home beds. The HEDNA suggests that a mid</u></p>	<p>Necessary for effectiveness, and to ensure that the policy uses appropriate definition for specialist housing</p> <p>Necessary for effectiveness to include appropriate definitions & specialist care provision</p>	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			<p>point between the SCC figures and its outputs (which arose due to a difference in prevalence rates) be used as the actual need figure, which is 308 residential units and 180 nursing care beds.</p> <p>Policy S7: Specialist Housing</p> <ol style="list-style-type: none"> 1) Development proposals for specialist accommodation, such as homes for older people, people with disabilities <u>and</u> students or the neurodiverse will be permitted where: <ol style="list-style-type: none"> a) there is robust evidence to support that it meets an identified need in the borough; b) an appropriate tenure mix is provided (where applicable); c) sites have good access to facilities, services and public transport; d) they 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; <u>and</u> 	<p>Necessary for effectiveness text modified with regard to specialist housing definition</p> <p>Deletion of criteria g and h as not necessary to make policy effective and justified</p> <p>Modified part 2 to be more effective and removed use class to ensure policy is consistent with national policy</p>	

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			<p>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.</p> <p>g) it can be demonstrated that revenue funding can be secured to maintain the long term viability of the scheme; and</p> <p>h) the scheme is supported by the relevant statutory agencies.</p> <p>2) Larger-scale new residential developments (over 200 C3 dwellings) will be required to incorporate <u>some</u> specialist accommodation, in line with the above criteria 1, unless there is reasonable evidence that it is not feasible.</p> <p>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 equivalent alternative provision is being made available locally through replacement or new facilities.</p>		
MM65	80	Policy DM3	<p>5.39. 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.</p> <p>5.40. 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.</p>	Necessary for effectiveness to remove use classes to future proof the policy	No. The change does not introduce any new LSEs that may compromise European site integrity.

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MM66	82-85	Policy S8	<p>Transit accommodation provision</p> <p>5.49. The provision of transit accommodation on well travelled routes across Surrey can help reduce incidences of unauthorised encampments. Careful consideration should be given to the location of a transit site to ensure it is on a well established travelling route. Policy S8 therefore sets the criteria that will be used to determine applications for transit use on unallocated land.</p> <p>Assessing applications for Gypsy and Traveller provision</p> <p>5.50. It is recognised that there are unlikely to be sites which would meet every one of the criteria detailed in Policy S8. A 'best fit' approach will therefore be adopted.</p> <p>5.51. It is expected that new pitches and plots should have adequate utility services, amenity space and parking, safe turning space and be in areas with reasonable access to schools, health services and local services. The impact of new sites on existing communities and how well proposals can be integrated is an important consideration in the determination of applications for Gypsy and Traveller provision.</p> <p>5.53. 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). <u>It is recognised that on occasion, such as family and community events, there may be visitors to gypsy, traveller and showpeople sites which could exceed the permitted number of caravans on a site. Therefore, planning conditions will be used specifying the number of days the site can be occupied by more than the permitted number of caravans.</u></p>	<p>Amended text for clarity and effectiveness</p> <p>Necessary for clarity and effectiveness to reword and remove 'transit'</p>	<p>No. This modification is an alteration of wording for clarity, effectiveness and to avoid repetition. The change does not introduce any new LSEs that may compromise European site integrity.</p>

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			<p>Policy S8: Gypsies, Travellers and Travelling Showpeople</p> <p>Safeguarding existing supply</p> <p>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.</p> <p>Planning applications</p> <p>2) Development proposals for gypsy and traveller and travelling showpeople accommodation and ancillary buildings, will be permitted where:</p> <p>a) The use of the land is of a scale appropriate to the location;</p> <p>b) the site is capable of being provided with necessary on-site services;</p> <p>c) the site is conveniently located for access to schools, medical services and other community facilities;</p> <p>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;</p>	<p>Modified Criteria f) to be worded positively around appropriate landscaping.</p> <p>Additional detail about access to utilities provided in Part 4) for clarity, remove criteria from part 4 C, not relevant, criteria 2f has been amended for conciseness, remove part 5 as covered by part 1. All necessary for effectiveness</p>	

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			<p>e) the site provides adequate space for storage, play and residential amenity;</p> <p>f) the site is appropriately not enclosed with hard landscaping, high walls or fences, to an extent that suggests deliberate isolation from the community;</p> <p>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</p> <p>i) ancillary buildings are of an appropriate scale and size.</p> <p>3) Proposals for mixed residential and business activities will be assessed on a site-specific basis, taking the above criteria into account.</p> <p>4) Proposals for transit gypsy and traveller accommodation will be permitted where the proposal:</p> <p>a) complies with the above <u>Part 2</u> criteria (except for c, <u>e, f and h</u>);</p> <p>b) can demonstrate it is located on an established travelling route.</p>		

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			<p><u>c) provides basic utilities including those for the supply of water and disposal of waste water.</u></p> <p>e) 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).</p> <p>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.</p> <p>Meeting future needs within larger unallocated development sites</p> <p>65) To meet the needs of Gypsy and Traveller households, accommodation will be expected to be provided on development sites of 200 C3 homes or more whilst there remains an identified unmet need within the borough. Where application sites are within Epsom Town Centre (as defined on the policies map) or the inclusion of Gypsy and Traveller accommodation can be demonstrated to have a significant negative impact on the efficient use of land, provision will not be expected. This will need to be robustly demonstrated.</p> <p>76) The number of pitches and plots required will reflect the level of local need within the borough. However, sites will have a minimum of 3 pitches/plots and should contain the maximum number of pitches/plots that can reasonably be accommodated on the site.</p>	<p>The Plan will meet the identified need through the site allocations proposed. As a result, this text is not necessary</p>	

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MM67	86	Policy S9	<p>6.1. At a strategic level, the Local Plan promotes sustainable economic development within the borough and the surrounding region (e.g. the "Gatwick Diamond"). However, for the purposes of this policy, economic development concerns mostly developing employment opportunities and improving prosperity for all in the borough. The council has carried out a robust and objective assessment of its employment needs which is detailed in the HEDNA. 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. The HEDNA shows that there is demand for at least 41,464sqm of additional employment floorspace in the borough to meet the needs of existing businesses and to cater for new businesses.</p> <p><i>6 new paragraphs inserted after para. 6.1.</i></p> <p><u>The Council has also carried out a retail needs assessment which concludes that there is no identified need to plan for additional convenience and comparison goods retail floorspace provision.</u></p> <p><u>Epsom Town Centre contains concentrations of office accommodation in addition to other employment generating uses such as retail, health and education provision which make a significant contribution towards the borough's economy.</u></p> <p><u>Kiln Lane and Longmead Industrial Estates are the two largest employment sites, providing approximately 25ha of employment land between them. Although the majority of uses at the site are industrial, warehousing & storage and distribution, they also accommodate some office uses. In addition, there are non-traditional</u></p>	Necessary for clarity to modify supporting text setting out the general strategy of intensification and new development where possible to ensure the policy is positively prepared and justified	No. Potential implications of the allocation of over 41,464sqm of additional employment floorspace as assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, Policy S9 remains in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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			<p><u>employment uses established at the site that fall within the Sui Generis use class, including vehicle sales and repairs, builders' merchants and trade counters.</u></p> <p><u>The HEDNA recommends securing warehousing and general industrial floorspace supply in key industrial estates of the borough and ensuring the appropriate type and size office accommodation is provided (generally smaller serviced office accommodation. This is to meet future needs for employment floorspace over the Local Plan period.</u></p> <p><u>To help support a prosperous economy, this policy designates Kiln Lane and Longmead Industrial Estates as strategic employment sites (as defined on the policies map) which provides the highest degree of protection and actively encourages the development, regeneration and intensification of these sites to provide modern floorspace for employment generating uses.</u></p> <p><u>The borough has a successful racehorse training industry associated with although separate from the Epsom Downs Racecourse, a nationally significant sporting venue. To ensure the long-term sustainability of these and address some of the challenges these industries face, it is important to safeguard land and support appropriate development proposals.</u></p> <p><u>6.2. In this respect the key objective of the plan will be to make provision for a range of sites to meet the needs of different types of business and tourism, to encourage diversification in the local economy. Such diversification can include adapting to new ways of working, changing demands for services and the night time economy. The borough has a vibrant cultural and creative sector, with an established theatre and</u></p>	<p>Necessary for clarity and effectiveness to define the two industrial areas in the policy</p>	

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			<p><u>two cinemas in Epsom Town Centre, and the University for the Creative Arts and Laine Theatre Arts and the Council is supportive of further developing this sector.</u></p> <p>Policy S9: Economic Development</p> <p>The sustainable growth of the borough's economy will be promoted to meet the needs of different sectors by:</p> <p>1) <u>Supporting the regeneration of Epsom Town Centre by enabling new and established businesses to grow</u> Protecting and safeguarding the Strategic Employment sites at Kiln Lane and Longmead Industrial Estates (as defined on the policies map) for employment generating uses to support job creation and meet the needs of the economy. <u>The development and intensification of these sites will be supported to provide floorspace for Employment Generating Uses that meets the needs of the market.</u></p> <p>2) Safeguarding strategic employment sites and encouraging the regeneration and intensification of land to meet the needs of the economy to support job creation and meet the needs of business. <u>Supporting the development of sites within Epsom Town Centre to provide floorspace that supports jobs creation and meets the needs of the economy.</u> by enabling new and established businesses to grow;</p> <p>3) Safeguarding land <u>and supporting appropriate development proposals which help for the horse racing industry to secure the long-term sustainability of the sector;</u> <u>Epsom Down Racecourse and racehorse training sector.</u></p>	<p>Necessary for clarity and effectiveness to modify text to set out the strategy for the protection and intensification of the industrial sites</p> <p>Necessary for clarity and effectiveness to modify the wording of part 1 to be more specific, wording moved from policy DM7 which addresses the loss of employment land</p> <p>Part 5 and 6 of the policy have been</p>	

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			<p>4) Supporting the visitor and night-time economy;</p> <p>5) Supporting the creative and cultural industries and further and higher education providers <u>by protecting existing and enabling the provision of new or extended venues and facilities where appropriate.</u> ÷</p> <p>6) Protecting existing cultural venues, facilities and uses where appropriate and supporting the development of new cultural venues in Epsom Town Centre.</p> <p><u>Key supporting documents</u></p> <p><u>Housing and Economic Development Needs Assessment (2023)</u></p> <p><u>Longmead and Kiln Lane Industrial Estates Economic Value Report (2022)</u></p> <p><u>Retail and Commercial Leisure Needs Assessment Update (2021)</u></p>	<p>combined for effectiveness and also reworded for the same reason</p> <p>Necessary for clarity and effectiveness to ensure policy is positively prepared</p> <p>Added key supporting documents after the policy for consistency</p>	
MM68	87-88	Policy S10	<p>6.4. A strong town centre policy enables a full range of town centre uses to be implemented within these sustainable locations 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. Town centre uses include, <u>residential</u>, retail, leisure, entertainment facilities, intensive sport and recreation uses, offices, arts, culture and tourism development.</p> <p>Policy S10: Retail Hierarchy and Network</p>	Necessary for clarity and consistency with national policy to define town centre uses	No. The land usage referred to in this policy does not deviate from the use of land assessed in the HRA Addendum. As such, Policy S10 remains in-keeping with the findings of the Addendum Report and no further

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			<p>1) 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 <u>and Neighbourhood Parades</u> (as shown on the policies map). The wider retail network also includes other retailing locations across our area.</p> <p>2) The overall hierarchy and network is defined as follows:</p> <p>a) Town Centre: Epsom Town Centre</p> <p>b) Local Centres: Ewell Village and Stoneleigh Centre</p> <p>c) Neighbourhood Parades:</p> <ul style="list-style-type: none"> • 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 	Necessary to add reference to neighbourhood parades in order to make the plan effective	LSEs that may compromise European site integrity are foreseen.

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			<ul style="list-style-type: none"> Waterloo Road, Epsom 		
MM69	89	Policy DM4	<p>6.11. Within Epsom Town Centre, Commercial, Business and Service Uses (Class E of the use classes order) are protected within primary frontages on the ground floor. Within secondary frontages, other supplementary uses such as drinking establishments and hot food takeaways may also be appropriate to contribute to the diverse range of services offered in a town centre, however, the level of existing provision will be considered <u>at the planning application stage</u> to avoid over concentration of a specific type of use. <u>Proposals will be considered on their merits subject to the provision of sufficient information to assess the potential impacts on amenity, diversity, vitality and viability of the proposed use (including cumulative impacts).</u></p> <p>6.12. Within the local centres, a range of <u>Commercial, Business and Service Uses</u> Class E uses and other town centre uses will be supported and where the loss of a <u>Commercial, Business and Service Uses</u> Class E use is proposed, the proposed use will need to demonstrate that it maintains an active frontage and a range and mix of products and services in the centre and would not harm the vitality and viability of the local centre.</p> <p>Policy DM4: Primary Shopping Areas and Retail Frontages</p> <p>Epsom Town Centre</p>	<p>Use classes removed for effectiveness, additional text provided in the supporting text to clarify how we would assess Policy Criteria1b over concentration</p> <p>Changes necessary in order to make the policy positively prepared and effective</p>	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			<p>1) Within Epsom Town Centre the Primary Shopping Area (as defined on the policies map), will remain the focus for retail activity and other town centre uses. Within the Primary Shopping Area:</p> <p>a) Within the primary frontage (as defined on the policies map) at ground floor level development within <u>Commercial, Business and Service use</u> use class E will normally be permitted;</p> <p>b) Within the secondary frontages (as defined on the Policies Map), at ground floor level, development within <u>Commercial, Business and Service Use</u> Use Class will normally be permitted. Sui Generis uses suited to a town centre, <u>Learning and non-residential Class F1 and Institutions and Halls or meeting places for the principal use of the local community Class F2(b)</u> will normally be permitted unless they result in an over concentration of those uses.</p> <p>c) Within the primary and secondary frontages, the effective and efficient use of upper floors for main town centre uses <u>and</u> or residential use, will be supported where it can be demonstrated that the loss of this floor space would not impact the viability of the ground floor use.</p> <p>2) Applications for the loss of <u>Commercial, Business and Service Class E</u> floorspace in the Epsom Town Centre Primary frontages will only be supported where it can be demonstrated that:</p> <p>a) There is no reasonable prospect of the site remaining in a <u>Commercial, Business and Service Class E</u> use;</p>	<p>Modified references to use classes in order to future proof the policy</p> <p>Necessary changes made in order to ensure the policy is effective</p>	

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			<p>b) Opportunities to reconfigure or reuse the site to retain its current use or another <u>Commercial, Business and Service Class E</u> use have been exhausted;</p> <p>c) The site has been marketed in accordance with Appendix 5;</p> <p>d) The proposed alternative use would not adversely affect the vitality and viability of the town centre.</p> <p>Stoneleigh and Ewell Local Centres</p> <p>3) Within the Local Centres (as defined on the policies map) the Council will support:</p> <p>a) A range of <u>Commercial, Business and Service uses</u> Use Class E and other appropriate town centre uses</p> <p>b) Development proposals involving a change of use from <u>Commercial, Business and Service use Class E</u> will not be permitted unless the alternative use maintains an active frontage and a range and mix of products and services in the centre and would not harm the vitality and viability of the local centre</p> <p>c) The efficient use of upper floors for main town centre uses or residential use where it can be demonstrated that the loss of this floor space would not impact the viability of the ground floor use</p>		

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MM70	93-94	Policy DM6	<p>6.20. The boundaries of the neighbourhood parades are shown on the Policies Map.</p> <p>Policy DM6: Neighbourhood Parades and Isolated Shops</p> <p>1) Within the neighbourhood parades <u>(as defined on the Policies Map)</u>, development proposals will be permitted providing they satisfy all of the following criteria:</p> <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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; and iii) The proposal does not result in an over concentration of a particular use. <p>2) Residential development at first floor level or above will be supported, subject to having safe and convenient access and not inhibiting the functioning or viability of the ground floor use.</p> <p>3) The loss of main town centre uses at ground floor to other uses, 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.</p>	<p>Not necessary – wording to be included within policy wording</p> <p>Necessary to provide clarity and effectiveness, modified text to signpost to neighbourhood parades as defined in the policies map</p>	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			4) Proposals to change the use of isolated shops 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		
MM71	95-96	Policy DM7	<p>Policy DM7 – <u>Loss of Employment Land</u></p> <p>6.24. The borough's employment sites make a valuable contribution towards supporting economic growth within the borough and wider sub region. There are a wide range of these employment sites dispersed <u>across the borough, both within the urban area and Green Belt (as defined on the policies map)</u>, within the borough's urban area, with concentrations of office accommodation in Epsom Town Centre and the Local Centres.</p> <p>6.25. Kiln Lane and Longmead Industrial Estates are our two largest employment sites, providing approximately 25ha of employment land between them. Although the majority of uses at the site are industrial, warehousing & storage and distribution, they also accommodate some 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 counters.</p> <p>6.26. The HEDNA recommends securing warehousing and general industrial floorspace supply in key industrial estates of the borough and ensuring the appropriate type and size office accommodation is provided (generally smaller serviced office accommodation. This is to meet future needs for employment floorspace over the Local Plan Period.</p> <p>6.27. To help support a prosperous economy, the policy designates Kiln Lane and Longmead Industrial Estates as strategic employment sites (as defined on the</p>	<p>Title modified, supporting text be modified to clarify it is specific to non-strategic employment sites outside of Longmead/Kiln La</p> <p>Deletion necessary to remove any unnecessary duplication from another policy</p> <p>Necessary for effectiveness</p>	No. Loss of employment land is not anticipated to give rise to any new LSEs that may compromise European site integrity.

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			<p>policies map) which provides the highest degree of protection and actively encourages the development, regeneration and intensification of these sites to provide modern floorspace for employment generating uses.</p> <p>6.28. <u>Policy S9 defines the boroughs strategic employment sites, which are safeguarded for employment generating uses. However, there are a wide range of</u> Employment areas outside of the defined strategic employment sites beyond the strategic employment sites that make a valuable contribution towards the economy of the borough and it is for this reason that the policy DM7 includes a criteria-based policy for assessing proposals that would result in the loss of <u>employment</u> floorspace.</p> <p>Policy DM7: <u>Loss of</u> Employment Land</p> <p>Strategic Employment Sites</p> <p>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.</p> <p>The development and intensification of these sites will be supported to provide floorspace for Employment Generating Uses that meets the needs of the market.</p> <p>Outside of the Strategic Employment sites</p>	<p>Deletion necessary to remove any unnecessary duplication from another policy</p>	

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			<p>1) The loss of floorspace occupied by employment-generating uses <u>beyond the strategic employment sites as defined on the policies map within the urban area</u> will be permitted where it is demonstrated that:</p> <p>a) there are no strong economic reasons to retain the Employment Use;</p> <p>b) there is no reasonable prospect of the site being retained in employment use <u>evidenced by at least 12 months of continuous marketing evidence</u>; and</p> <p>c) the site is no longer suitable for its existing use or other employment uses.</p>	Added marketing period into the policy to ensure the policy is effective	
MM72	97-98	Policy DM8	<p><u>Policy DM8 – Racehorse Training Zone Epsom Downs Racecourse and the Racehorse Training Industry</u></p> <p>6.31. The borough has <u>long been associated with horse racing, being home to Epsom Downs Racecourse, a nationally significant sporting venue, and a successful racehorse training industry. associated with the Epsom Downs Racecourse, a nationally significant sporting venue located within the Green Belt. The area is one of only two locations in the UK where both a racecourse and racehorse training co-exist. The Council is supportive of the industry, recognising its historic links with the area and the value it has to the local and wider economy. Policy S9 is reflective of this.</u></p> <p><u>Epsom Downs Racecourse is internationally renowned as the home of the Derby, flat racing’s ‘blue riband’ event and currently holds 11 racing fixtures per annum. While horseracing is the core activity, the racecourse also operates as a key</u></p>	Policy DM8 and the supporting text has been modified to accurately reflect the significance of the Racehorse training industry in Epsom which is necessary for effectiveness and to ensure the plan is positively prepared	No. Potential implications of additional development within the Green Belt were considered in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated; thus the conclusions of the Addendum Report remain valid and no new LSEs that may compromise European

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			<p><u>meetings, conferences, events and functions venue, which is important to both its long-term economic viability and the local economy. The Racecourse Area is defined on the Policies Map.</u></p> <p>Surrounding the racecourse itself (as defined on the Policies Map) are the nationally important racehorse training grounds, <u>located in Epsom and Walton Downs</u> which make a positive contribution to the economy and sporting heritage of the area.</p> <p>6.32. There are several racehorse training facilities / stable complexes <u>yards</u> in the <u>Borough</u> (and neighbouring boroughs) which are well-located to support the ongoing use of the training grounds, <u>at Epsom Downs. These sites and their associated training grounds, paddocks and fields are included within the Racehorse Training Zone defined on the Policies Map, within which any development proposals will be considered against, as well as all other relevant policies in the Local Plan.</u> Both the racehorse training grounds and the racehorse training yards comprise the <u>Racehorse Training Zone, which is defined on the Policies Map.</u></p> <p><u>The Racecourse Area and Racehorse Training Zone are located within the Green Belt.</u></p> <p><u>Epsom and Walton Downs, where the training grounds are located, are privately owned and are managed by the Epsom and Walton Downs Conservators through an Act of Parliament. The principal role of the Conservators is to:</u></p> <ul style="list-style-type: none"> <u>• Enable the training of racehorses on the Downs until midday</u> <u>• Preserve the Downs in their natural state of beauty</u> <u>• Maintain public rights of access</u> 		<p>site integrity are foreseen.</p>

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			<p>• <u>Ensure that the various users respect each other's rights and the Down environment</u></p> <p><u>There are strong economic links between the training yards, training grounds and the maintenance of Epsom and Walton Downs. The loss of racehorse training yards within the Racehorse Training Zone is harmful to the ongoing viability of the racehorse training grounds, which could negatively impact on the economy, sporting heritage of the area, and long-term management of Epsom and Walton Downs. For this reason, policy DM8 seeks to ensure the ongoing availability of suitable racehorse training yards to sustain the long-term viability of the industry, with losses being resisted unless there is clear evidence that there is no realistic prospect of the use of the site as a racehorse training yard continuing or such a use becoming re-established in the future. Marketing periods of no less than 24 months will be required by a recognised agent specializing in the racing sector property market. Further details on marketing requirements are contained in Appendix 5.</u></p> <p>These sites and their associated training grounds, paddocks and fields are included within the Racehorse Training Zone defined on the Policies Map, within which any development proposals will be considered against, as well as all other relevant policies in the Local Plan.</p> <p>6.33. <u>It is recognised that the racehorse training industry requires specific supporting infrastructure to effectively function. This includes but is not limited to on-site/nearby staff accommodation, horse walks, gallops, paddocks and horse walkers.</u> In the case of development or alterations to <u>racehorse</u> training yards, development should be designed in line with the British Horseracing Authority's requirements.</p>		

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			<p><i>3 new paragraphs inserted following para 6.33</i></p> <p><u>The occupation of any staff accommodation should be restricted by condition and/or legal agreement as appropriate, to solely be for staff to ensure the general day to day operations and management of the horseracing/racehorse training industry use.</u></p> <p><u>Access routes to and from the racehorse training yards and training grounds are identified on the Policies Map as Racehorse Movement Corridors. There is the potential for conflict between racehorses and other road users along parts of some routes. These are highlighted on the Policies Map. The Council will support schemes to improve the safety of these routes for horses, pedestrians and other road users.</u></p> <p>6.34. The loss of equestrian facilities within the Racehorse Training Zone is potentially harmful to the ongoing viability of the 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.</p> <p>6.35. Marketing periods of no less than 18 months will be required by a recognised agent specializing in the racing sector property market. Further details on marketing requirements are contained in Appendix 5.</p> <p><u>Policy DM8: Racehorse Training Industry Epsom Downs Racecourse and Racehorse Training Industry</u></p>		

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			<p><u>Racecourse Area</u></p> <p>Within the extent of the racecourse <u>area</u>, as <u>defined</u> identified on the Policies Map, development proposals to support the continued use of the site for horse racing purposes will be supported, subject to Green Belt considerations. <u>This may include suitable non-racing development to support the long-term viability of the racecourse.</u></p> <p><u>Racehorse Training Zone</u></p> <p>Within the Racehorse Training Zone, <u>as defined</u> identified on the Policies Map:</p> <p>Proposals which facilitate the long-term or future use of the site <u>for the racehorse training industry and/or as a racehorse training yard</u> racing stable and/or for the racehorse training industry will be supported, <u>subject to Green Belt considerations. This may include the development of new facilities, such as infrastructure to support the industry, and/or the expansion/reconfiguration of existing facilities.</u></p> <p>Any proposals resulting in the loss of specific facilities which would support the long term or future use of the site as a <u>racehorse training yard</u> racing stable will be resisted.</p> <p>The change of use or redevelopment of existing racehorse training <u>yards</u> for alternate uses not in connection with the horse racing / racehorse training industry will not be permitted unless evidence has been provided that:</p>		

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			<p>i) Marketing of the site for the horse racing sector has taken place for a period of at least 24¹⁸ months, at a reasonable market value with a recognised agent specializing in the racing sector property market; and,</p> <p>ii) <u>There is the opportunity for the site to revert to a racehorse training yard or uses in connection with the racehorse training industry in the future or that such opportunities to enable this have been fully explored and exhausted. Opportunities to reconfigure and reuse or redevelop the site so that it can revert to racehorse training that supports the racehorse training industry in the future have been exhausted</u></p> <p><u>Racehorse Movement Corridor</u></p> <p>Anyll proposals, regardless of the type of development, should demonstrate that it <u>they</u> will not adversely affect the <u>Racehorse Movement Corridor, as defined on the Policies Map, in terms of the safety of racehorses travelling between training yards and the training grounds and the racing stable yards</u> by virtue of the traffic generation from or the design of the development and provide mitigation where there is an impact.</p> <p><u>4) Proposals which would improve the safety of horses, pedestrians and other road users along these routes, particularly those where the potential for conflict has been identified (as defined on the Policies Map), will be supported.</u></p>		

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MM73	99-100	Policy DM9	<p>6.38. New visitor accommodation will be supported in areas with good access to frequent and direct public transport and amenities in the borough such as identified town or local centres. This will focus development in parts of the borough where access to public transport can be optimised. <u>which are well served by public transport, this includes proximity to rail stations or frequent bus services.</u></p> <p>6.39. The occupation of new tourist accommodation will be restricted using conditions or legal agreements to ensure visitor accommodation is for tourist use and not permanent residential use.</p> <p>Policy DM9: Visitor Accommodation</p> <ol style="list-style-type: none"> 1) Planning permission will only be granted for the development of visitor accommodation in the following locations: <u>1) Epsom Town Centre, 2) Local Centres, on sites allocated for that purpose, and 3) in locations which are well served by public transport</u> 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 satisfy the following criteria: <ol style="list-style-type: none"> a) they are acceptable in terms of access, parking, highway safety, traffic generation, pedestrian and cycle movements; and b) there is no <u>permanent</u> loss of residential dwellings; and 	<p>Modified text to clarify the need for visitor accommodation to be located close to public transport for effectiveness and remove unnecessary text about the use of conditions</p> <p>Necessary for clarity and effectiveness to modify part 1 to clarify the locations where visitor accommodation will be granted</p> <p>Added text to clarify that the policy applies to the permanent loss of residential to take</p>	No. The change introduces no further LSEs that may compromise European site integrity.

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			<p>c) the accommodation will not result in an unacceptable level of noise and disturbance to nearby residents.</p> <p>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:</p> <p>a) no other occupier can be found following a realistic effort to market the premises for a period of at least 12 months, for continued use as visitor accommodation (whether or not of the same form of the existing use); and</p> <p>b) evidence of non-viability is submitted.</p>	into account short term/temporary forms of visitor accommodation	
MM74	101-102	Policy S11	<p>S11 Design and Heritage</p> <p><u>7.1. High quality</u> dDesign is essential to retaining the borough's distinct sense of place, as stipulated in the plan's vision and strategic objectives. In addition to As well as the appearance of how development "looks" and achieving "beauty", design is also a crucial to <u>health and well-being</u>, sustainable development, climate change, health and other factors which are important for the borough.</p> <p><i>Three new paragraphs to be inserted following para. 7.1</i></p> <p><u>The borough has a rich, varied and evolving history, which contributes significantly to its sense of place and identity. Our relationship with history is characterised in no small part by the built environment, particularly by its "heritage assets" (as defined by the national planning policy), which also make an important contribution to the quality of the borough's townscape.</u></p>	Necessary changes made to align with national planning policy	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			<p><u>The Town of Epsom and village of Ewell have evolved over time which has influenced their character and appearance, with historic cores containing listed buildings. Major periods of urban growth took place in the 1930s and 1950s. The predominant housing type constructed was low density semi-detached suburban housing. Development from the 1950's onwards is more diverse with many areas of smaller infill, some modern developments in Epsom Town Centre and more recently the redevelopment of the hospital cluster sites. The character and appearance of development is therefore key to how development integrates into its surroundings.</u></p> <p>The Council is in a strong position to require good and efficient design from development. The viability assessment of the plan has been conducted in the context of market conditions which are very buoyant in this part of England. Therefore, proposals will be required to demonstrate high quality design.</p> <p>7.2. It is therefore very important that the borough encourages the highest standards of design in all new developments, and a design policy is considered a strong foundation on which to do this. Of particular importance is the need for development to make efficient use of land, due to the rich variety of protected land use designations unique to the borough, which are under pressure due to high demand for development. The council considers "efficient use of land" to mean, for major development (as defined by the Town and Country Planning Act etc.) a minimum of:</p> <ul style="list-style-type: none"> • 80 dwellings per hectare in Epsom Town Centre (as defined on the Policies Map) • 60 Dwellings per hectare) near public transport hubs beyond Epsom Town Centre, and 	<p>Necessary additions for effectiveness as Policy S13 Heritage will be deleted and combined with this policy</p> <p>Deleted text as density standards moved to policy wording to ensure policy is positively prepared</p>	

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			<p>* 40 dwellings per hectare in the remaining defined urban area as defined on the policies map other urban areas.</p> <p>7.3. The council is in a strong position to require good and efficient design from development. The viability assessment of the plan has been conducted in the context of market conditions which are very buoyant in this part of England. Therefore, proposals will be required to demonstrate good design. This policy complements the National Design Guide and the National Planning Policy Framework, which provides further context and principles with regards to design expectations.</p> <p>7.4. This policy complements the National Design Guide and the National Planning Policy Framework, which provides further context and principles with regards to design expectations. It should also be recognised that "good design" is not only the domain of this policy, but complemented by others in this plan, and should not be treated as a policy to be traded-off against. To provide further assistance, the Council may provide further prescriptive guidance by producing its own design codes in the future, with which compliance will be expected. The Council will encourage developers to engage in the Design Panel Review process to help improve the design quality of new developments in the Borough. Design South East provides this service and it is recommended that the panel are appointed as early as possible in the scheme's development.</p> <p>S11 Design and Heritage</p> <p>The design of development <u>The Council will require high quality and appropriate design from development</u> of all scales (including extensions, alterations and</p>	Necessary for effectiveness and to ensure that the supporting text aligns with national policy	

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			<p>conversions). <u>Proposals</u> should be appropriate in relation to the character, appearance and functioning of the built and natural environment by:</p> <p>a) making efficient use of land; and a) <u>Optimising the potential of the site to accommodate an appropriate amount and mix of development</u></p> <p>b) being of appropriate use, scale, mass, proportion, detailing, material, layout and siting; and</p> <p><u>c) enhancing (as far as possible) the borough's cultural, historic, architectural and townscape character, protecting the character of historic places and the significance of designated heritage assets; and</u></p> <p>d) respecting the scale, appearance, <u>building lines</u> and location of buildings, spaces and visual amenity of the surrounding area; and</p> <p><u>e) having a positive impact on public realm by enhancing the quality of the existing public realm and maximising opportunities to create new public realm where appropriate; and</u></p> <p><u>f) creating a sense of place through provision of attractive soft landscaping and open space where appropriate; and</u></p> <p><u>g) maximising opportunities for natural security through layout and design by incorporating secured by Design Standards; and</u></p>	<p>Necessary modifications for greater clarity including in relation to efficient use of land, appropriate densities for different locations, reference to the design code. Changes made to the policy to ensure it is effective and consistent with national policy</p>	

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			<p><u>h) demonstrating how the scheme has been developed in accordance with the principles set out in the National Model Design Code and</u></p> <p>⇒ <u>i) maximising opportunities for integrating passive design principles, including orientation, glazing and shading.</u></p> <p>⇒ <u>i) where appropriate, providing well structured, practical and attractive areas of soft landscaping and open space.</u></p> <p><u>All development should make efficient use of land, with major schemes that include residential uses expected to achieve the following minimum densities dependent upon their location:</u></p> <p><u>i. Epsom Town Centre (as defined on the policies map) 80 dwellings per hectare</u></p> <p><u>ii. Sites within 400m of a rail station and / or high frequency bus corridor (as defined in the glossary) beyond Epsom Town Centre 60 dwellings per hectare</u></p> <p><u>iii. The remaining urban area (as defined on the policies map) 40 dwellings per hectare</u></p> <p><u>On a case-by-case basis, it may be appropriate for larger developments to be shaped by a design review panel process proportionate to their scale and significance</u></p> <p><u>Key supporting documents</u></p>	Key supporting document added for	

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			<ul style="list-style-type: none"> <u>National Model Design Code</u> 	consistency with other policies	
MM75	103	Policy S12	<p>DM24 S12-Amenity Protection</p> <p>7.7 Overlooking from public rights of way, play areas and neighbouring properties should be taken into account in any development proposal. The layout and orientation of buildings should take advantage of sunlight and should not block daylight to habitable rooms, dominate or enclose neighbouring residencies. There is an expectation that residential developments will have a separation distance of at least 20m between elevations (rear to rear), unless it can be demonstrated that this would not harm residential amenity.</p> <p><u>DM24 S12-Amenity Protection</u></p> <p>All development should secure the amenities of its future occupants, and protect those amenities enjoyed by nearby and adjacent properties. The design of development, should have regard to:</p> <p><u>Have an acceptable impact on the living environment of occupiers of existing residential properties and / or provide adequate living conditions for future occupiers of residential properties; and</u></p> <p><u>Mitigate privacy and overlooking through the provision of a minimum separation distance of 20m between residential properties unless it can be demonstrated that</u></p>	<p>Changed from strategic to non-strategic policy as the policy does not meet the relevant tests of the Framework</p> <p>Removed text as now moved to policy wording to ensure it is effective</p> <p>Moved reference to separation distances from supporting text to ensure the policy is effective</p> <p>Changes made to the policy to ensure it is positively prepared, effective and consistent with national policy</p>	No. The change introduces no further LSEs that may compromise European site integrity.

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			<p><u>there would be no harm to residential amenity and / or it would prevent the efficient use of land in sustainable location; and</u></p> <p>a) <u>Limit the loss of privacy</u>, daylight, and sunlight; and</p> <p>b) <u>Mitigate the impacts of:</u></p> <p>i) Noise, vibration, light, heat, smell and airborne emissions consisting of odour, fumes, smoke, soot, ash, dust and grit; and <u>artificial light, and</u></p> <p>e) ii) activity levels and <u>Traffic movements to, from generation; and within the site</u></p> <p>d) security of property and personal safety.</p> <p><u>Key supporting documents</u></p> <p><u>National Model Design Code</u></p> <p><u>Building Research Establishment - A Good Practice Guide for site layout planning for daylight and sunlight.</u></p>	Added key supporting documents added for effectiveness	
MM76	104-105	Policy DM10	<p><u>Policy DM10 – Building Emissions and Energy Standards</u></p> <p><u>Policy DM10: Building Emissions and Energy Standards</u></p>	Title and policy name change-Amendment necessary to ensure policy is effective	No. The change introduces no further LSEs that may compromise European site integrity.

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			<p>All proposals should embed the Energy Hierarchy within the design of buildings by prioritising fabric first, orientation and landscaping in order to minimise energy demand for heating, lighting and cooling.</p> <p>All proposals should consider opportunities to provide solar PV and energy storage.</p> <p>Residential development will be required to achieve Net Zero Carbon, demonstrated through the submission of an appropriate energy assessment that demonstrates how the proposal will achieve:</p> <p><u>a)</u> Space heating demand less than 30kWh/m2/annum</p> <p><u>b)</u> Total energy use less than 40kWh/m2/annum; and</p> <p><u>c)</u> On-site renewable energy generation to match the total energy use, with a preference for roof mounted solar PV.</p> <p>Where the use of on-site renewables to match total energy consumption is demonstrated to be not technically feasible (for example with taller flatted buildings) or economically viable, renewable energy generation should be maximised as much as possible; and/or connection to an existing or proposed district energy network.</p> <p>All non-residential development must achieve a minimum of BREEAM 'Excellent' UK New Construction standard or equivalent, or any equivalent new standard. This</p>		

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			standard should be achieved through increasing energy efficiency of the proposed buildings, and/or the provision of on-site renewable and low-carbon technologies.		
MM77	106	Policy DM11	<p>7.17. The policy requires that new dwellings, <u>as a minimum</u>, meet the tighter Building Regulations optional water efficiency requirement of 110 litres per person per day <u>or any increased standard that may be introduced in the future</u>, this is a continuation of current previous policy in the borough. <u>Planning conditions maybe used on planning approvals for new dwellings to ensure the optional requirement is applied and that this is calculated using the 'fittings based approach'</u>.</p> <p><u>Key supporting documents</u></p> <p><u>Approved Document G: sanitation, hot water safety and water efficiency</u></p>	<p>Necessary modifications supporting text to ensure policy is effective</p> <p>Modified to include Key document - consistent with other policies</p>	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM78	107	Policy DM12	<p><u>Key supporting documents</u></p> <p><u>The Surrey Health and Well-Being Strategy</u></p> <p><u>Surrey Health Impact Assessment Guidance Statement</u></p>	Modified to include Key document - consistent with other policies	No. The change introduces no further LSEs that may compromise European site integrity.

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			<u>Joint Strategic Needs Assessment (JSNA) contains a wealth of health data.</u>		
MM79	108	Policy S13	<p>Policy S13 – Preserving identity of place with heritage</p> <p>7.23. The borough has a rich, varied and evolving history, which contributes significantly to its sense of place and identity. Our relationship with history is characterised in no small part by the built environment, particularly by “heritage assets” (as defined by the national planning policy), which also make an essential contribution to the quality of the borough’s townscape.</p> <p>7.24. Importantly, these heritage assets provide context for development, and can collectively act as a useful compass to guide decision making. It is therefore vital that tangible and cultural heritage assets and their settings are either protected or enhanced, or where necessary, adapted in a sensitive way.</p> <p>Policy S13: Preserving identity of place with heritage</p> <p>1) Development will be permitted where as far as possible, it enhances the borough’s cultural, historic, architectural and townscape character.</p> <p>2) The Council will seek to utilise mechanisms available through national policy and legislation, to protect the character of historic places and the significance of designated heritage assets, and uphold the principles upon which such protection has been justified.</p>	Policy deleted as matters adequately addressed by policy S11	No. Policy deletion introduces no further LSEs that may compromise European site integrity.

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			<p>Key supporting documents</p> <ul style="list-style-type: none"> ♦ National Heritage List for England ♦ Locally Listed Heritage Assets ♦ Conservation Area Appraisals ♦ Historic England Advice Notes ♦ Local Plan Heritage Topic Paper ♦ Appendix 6 – Guidance on Proposals Impacting Heritage Assets. 		
MM80	110	Policy DM13	7.35. The level of detail required to demonstrate the impact of a development on any heritage asset shall be at the in line with the NPPF discretion of the Council, taking into consideration National Policy and Guidance and the Council's own planning application validation requirements. For further information see Appendix 65, guidance on proposals impacting Heritage Assets.	Necessary for effectiveness and to ensure the policy is positively prepared	No. The change introduces no further LSEs that may compromise European site integrity.
MM81	111	Policy DM14	<p>Policy DM14: Shopfronts</p> <p>The design of new shopfronts and other commercial signage and the re-design of existing shopfronts and commercial signage should demonstrate:</p> <p>respect for the architecture and features of the buildings in or on which they are set and the character of the area;</p> <p>public safety would not be prejudiced;</p> <p>visual pollution and clutter are avoided;</p> <p>the proposal will provide an 'active street front'.</p>	Deleted reference to future revisions to this document as policy wording not effective	No. The change introduces no further LSEs that may compromise European site integrity.

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			<p>Shopfront Design should accord with the Council's guidance for shopfronts: 'Shopfront Design Guide' or any future revisions to this document.</p> <p>The Council will resist the removal of shopfronts of architectural or historic interest.</p> <p>The Council will control 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).</p>		
MM82	112	Policy DM15	<p>Policy DM15 – Green Belt</p> <p>7.39. Approximately 40% of Epsom and Ewell is Green Belt; land designated under a national policy designed to restrict the urban sprawl from London. The Green Belt serves five purposes:-</p> <p>to check the unrestricted sprawl of large built-up areas;-</p> <p>to prevent neighbouring towns merging into one another;-</p> <p>to assist in safeguarding the countryside from encroachment;-</p> <p>to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</p> <p><u>Green Belt policy can be found in the National Planning Policy Framework. Policy DM15 is not intended to repeat national policy, but to provide local detail on specific policy matters.</u></p>	Modified policy and supporting text to provide clarity in relation to extensions and major developed sites in the Green Belt necessary for effectiveness and consistency with national policy, and to ensure that the supporting text does not contain policy requirements	No. The conclusions of the Addendum Report remain valid; changes to the policy wording introduce no new LSEs that may compromise European site integrity.

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			<p><i>Two new paragraphs inserted after para. 7.39.</i></p> <p><u>The Green Belt is very important to Epsom & Ewell as it:</u> <u>positively contributes to the boroughs identity, character and appearance;</u> <u>prevents coalescence with other settlements to the west, east and south;</u> <u>contains public open spaces such as Horton Country Park, Epsom Common and the Epsom Downs, parts of which are protected by national and local environmental designations,</u> <u>provides land for sport, including sports pitches which play a valuable role in health and wellbeing contains the Epsom Downs Racecourse, racehorse training industry and infrastructure,</u></p> <p><u>Proposals within the Green Belt will be expected to comply with all other Local Plan policies when taken as a whole, particularly those that cover design, amenity, landscape, biodiversity and flooding.</u></p> <p>7.40. National policy defines what is inappropriate and what exceptions to this definition exist, and should be read in conjunction with this policy. It also defines what is not inappropriate development. This policy aligns with the NPPF definitions and exceptions but adds the following detailed definitions to them:-</p> <p>Extensions or alterations</p>		

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			<p>The “original building” shall mean either: the building as it existed on 1 July 1948; or if no building existed on 1 July 1948, then the first building as it was originally built after this date.</p> <p>Replacement buildings</p> <p>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.</p> <p><u>In terms of extensions or alterations to an existing dwelling or other building within the Green Belt, this will be considered against the original building, which is the size of the building that existed on 1 July 1948 or the building as first built if later than this date. This is to enable the effect of cumulative development to be taken into account when a building has been extended previously. The cumulative impact of a series of small extensions can be just as great as a single large addition. The size of the plot is not relevant when considering whether a replacement building is materially larger or an extension results in disproportionate additions.</u></p> <p>Policy DM15: Green Belt</p> <p>Green Belt</p> <p>4) — Development in the Green Belt will be considered inappropriate, and will not be permitted unless:</p>		

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			<p>a) the development itself is an exception to the definition of “inappropriate” as defined by the National Planning Policy Framework; or</p> <p>b) there are very special circumstances to justify the inappropriate development.</p> <p>2) Very special circumstances are circumstances where other considerations clearly outweigh the harm to the Green Belt as a result of the development.</p> <p><u>1) The Green Belt boundary is defined on the Policies Map. In order to uphold the fundamental aims of the Green Belt, inappropriate development should not be approved except in very special circumstances. 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.</u></p> <p><u>Replacement and Extension of Buildings in the Green Belt</u></p> <p><u>2) The Council will permit the replacement of a building in the Green Belt provided the new building:</u></p> <p><u>a) would be in the same use; and</u></p> <p><u>b) is not materially larger than the one it replaces; and</u></p> <p><u>c) is sited on or close to the position of the existing building, unless an alternative position would benefit the openness of the Green Belt; and</u></p>		

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			<p><u>d) does not have a materially greater impact on the openness of the Green Belt.</u></p> <p><u>3) The Council will permit the extension and alteration to a building in the Green Belt provided the additional development:</u></p> <p><u>a) is not disproportionate, over and above the size of the original building; and</u></p> <p><u>b) does not have a materially greater impact on the openness of the Green Belt.</u></p> <p><u>Infill or redevelopment of previously developed land in the Green Belt</u></p> <p><u>4) The Council will permit limited infilling of previously development land in the Green Belt provided the development:</u></p> <p><u>a) does not have a materially greater impact on the openness of the Green Belt; or</u></p> <p><u>b) does not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.</u></p>		
MM83	115	Policy S14	<p><i>New paragraph after para. 7.49.</i></p> <p><u>The Council holds a licence granted by Natural England under the Great Crested Newt District Licencing Scheme. This is to ensure appropriate monitoring and mitigation takes place with regard to the habitats of great crested newts and assessment of impacts from proposed development.</u></p> <p>7.50. The council recognises the opportunities to encourage biodiversity that can be provided through the development of sites. These include providing, retaining and enhancing wildlife and <u>river</u> corridors and incorporating opportunities within</p>	<p>Additional text necessary to ensure the policy is effective</p> <p>Clarification the contribution made by blue infrastructure to</p>	No. The change introduces no further LSEs that may compromise European site integrity.

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			<p>construction methods, such as green roofs, and the provision of suitable appropriate native species in landscaping.</p> <p>Policy S14: Biodiversity and Geodiversity</p> <ol style="list-style-type: none"> 1) Development proposals will be permitted where they do not have an adverse impact on biodiversity, or geodiversity. Where harm or loss cannot be avoided, mitigation will be required such that it can robustly demonstrate that: <ol style="list-style-type: none"> 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) the mitigation measures make a specific and positive contribution towards conservation objectives of Biodiversity Opportunity Areas or area identified as a priority for nature recovery in the emerging Local Nature Recovery Strategy LNRS (if located within such area); and e) there will be no adverse effect on the integrity of linkages between designated sites and priority habitats <u>are maintained or enhanced</u>. 	<p>ensure the policy is effective</p> <p>Necessary modification part e to be positively prepared</p> <p>Amendment to clarify the importance of mitigation necessary for the policy to be positively prepared</p>	

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			<p>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, it must be robustly demonstrated that the benefits of the development proposal clearly outweigh the loss or harm and that appropriate <u>mitigation and/or</u> compensation will be sought.</p> <p>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.</p> <p>Key supporting documents</p> <ul style="list-style-type: none"> • Epsom and Ewell Biodiversity Action Plan (2020-2030) • Emerging Local Nature Recovery Strategy • Water Framework Directive 	Additional supporting document for consistency and to ensure policy is positively prepared	
MM84	117-118	Policy S15	<p>Policy S15 DM25 – Biodiversity Net Gain</p> <p>7.53. This policy will require at least 10% BNG on qualifying development proposals and 20% BNG from <u>seven</u> greenfield site allocations <u>SA33 -SA35 and SA48 -51</u> <u>where the</u> This higher requirement is detailed in the site allocation policy.</p>	Modified the policy from strategic policy to development management policy Changes are necessary for clarity and effectiveness and to	No. The change introduces no further LSEs that may compromise European site integrity.

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			<p>7.56. To implement the general biodiversity gain condition, a Biodiversity Gain Plan demonstrating a biodiversity net gain of at least 10% (or the higher 20% requirement for specific site allocations <u>or on unallocated sites that lie outside the urban area as defined on the policies map</u>) must be approved before development commences on a site. BNG will be provided either on-site, off site or through statutory biodiversity credits in line with the BNG hierarchy.</p> <p>7.57 Biodiversity net gain will be secured by planning condition, legal agreement or a conservation covenant, for a period of at least 30 years after the completion of the development</p> <p>Policy S15DM25: Biodiversity Net Gain</p> <p>1) Planning applications, other than those that are exempt in accordance with the regulations, will be permitted provided that <u>the council is satisfied it can be demonstrated</u> that at least 10% biodiversity net gain can <u>be</u> achieved (unless a higher requirement has been specified in a site allocation policy <u>or on unallocated sites that lie outside the urban area as defined on the Policies Map</u>).</p> <p>2) Biodiversity net gain should be delivered using the following hierarchy <u>(note this does not apply to irreplaceable habitats)</u>:</p> <p>a) On-site as part of the development <u>which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity</u></p>	<p>remove unnecessary duplication.</p> <p>Modified for effectiveness the site allocations outside the urban area require 20% BNG</p> <p>Remove supporting text as not justified</p> <p>Necessary for clarity and effectiveness</p> <p>Modified text to accord with national policy</p> <p>Criteria b and c modified for clarity</p>	

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			<p><u>metric), the avoidance of adverse effects from development and, if they cannot be avoided, the mitigation of those effects; and</u></p> <p>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 <u>then, in relation to all onsite habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits;</u></p> <p>c) As a last resort, if it can be demonstrated that neither of these options are either available or economically feasible, net gain should be secured on land within the borough boundary. BNG offsets should align with and deliver the LNRS and preferably within BOAs.</p> <p>3) Biodiversity net gain will be secured by planning condition, legal agreement or a conservation covenant, as appropriate.</p> <p>Key supporting documents</p> <p>Surrey Nature Partnership, Recommendation for adoption of 20% minimum BNG <u>biodiversity net gain across Surrey's planning sector: a Surrey Nature Partnership Position Statement</u> (2020)</p> <p>Statutory biodiversity M<u>metric tools and guides:</u> https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides</p>	Supporting documents added/removed for consistency and to ensure policy is positively prepared	

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			<p>Small sites metric: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides</p> <p>Guidance – Buy Statutory biodiversity credits https://www.gov.uk/guidance/buy-statutory-biodiversity-credits</p> <p>Planning Practice Guidance Biodiversity Net Gain</p>		
MM85	119-120	DM17	<p>Policy DM17: Trees, Woodlands and Hedgerows</p> <p>Development proposals will be permitted where:</p> <ul style="list-style-type: none"> a) they do not result in the loss of, or damage to, trees, woodlands and hedgerows that make a significant contribution to the character or amenities of an area, unless the benefits would clearly outweigh the loss and equivalent replacement planting is provided. b) they do not result in the loss of or damage to ancient woodland, ancient or veteran trees or trees protected by Tree Preservation Order (TPO) unless there are exceptional <u>reasons circumstances</u> and <u>a suitable compensation strategy appropriate planting</u> to mitigate the loss in biodiversity and natural asset is proposed <u>and maintained</u>. <u>Where development is proposed adjacent to ancient woodland, suitable buffer zones of a minimum 15m must be provided (in line with Natural England's Standing Advice).</u> c) they make provision for <u>new streets to be tree lined and new street trees</u> and trees within public open space (subject to site suitability) with sufficient space provided for the trees to grow to maturity, both above and below ground. 	<p>Modified for clarity and effectiveness to signpost to relevant technical standards</p> <p>Additional text about buffer zones to ensure consistency with national policy</p> <p>Modified part b to include 'and maintained' to increase emphasis on preservation and maintenance</p> <p>Modification to reflect national policy and Standing Advice from Natural England</p>	No. The change introduces no further LSEs that may compromise European site integrity.

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				regarding buffers to ensure root protection	
MM86	121-123	Policy S16	<p>7.66. Whilst the thresholds for flood zones and how different types of development should be approached are defined at a national level, the council has discretion as to the interpretation of “flood zone 3b”. It has taken a precautionary approach and set a high bar by defining flood zone 3b as areas with a 1 in 3020 year fluvial flood risk or <u>greater</u> (>3.35 % Annual Exceedance Probability (AEP)), which is also as consistent as possible with most other Local Planning Authorities in Surrey.</p> <p>7.67. Areas susceptible to Surface Water Flooding (SFW) are identified within the SFRA and not included within the flood zone thresholds, but will trigger the need for a site specific Flood Risk Assessment (FRA). It should be noted that areas of Surface Water Flooding are defined with the Surface Water Management Plan (2011) <u>as identifies</u> “Critical Drainage Areas” (CDAs). These are not the same as the national designations of the same name defined by the Environment Agency, and should not be conflated.</p> <p>7.68. In recognition of the heightened challenge faced by flooding, the Council has also heeded EA advice that development should be located 8m away from river banks. However, requirements under Biodiversity Net Gain Requirements may necessitate further set-backs and should be considered in parallel to this policy requirement.</p> <p>7.70. The Level 2 assessment also provides further bespoke guidance for each allocated site as to whether further a site specific Flood Risk Assessment (FRA) will be required on application as well information about the FRA should be conducted.</p>	<p>Necessary modification to correct the number of years from 20 to 30 year fluvial flood risk for effectiveness</p> <p>Necessary to ensure consistency with national policy</p>	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			<p><i>Insert new paragraph after paragraph 7.70</i></p> <p><u>Sustainable drainage systems (SuDS) manage surface water in a way that mimics natural processes, providing a wide range of benefits beyond traditional drainage methods. SuDS should be incorporated into development in accordance with the National Standards for Sustainable Drainage Systems.</u></p> <p>Policy S16: Flood Risk and Sustainable Drainage</p> <p>Development will be permitted where:</p> <ul style="list-style-type: none"> a) It demonstrates compliance with guidance set out in the Epsom and Ewell Borough Council Strategic Flood Risk Assessment 2024 (SFRA) and associated central Government policy and Guidance. b) Where necessary (as defined by Government Policy and Guidance), Sequential and subsequent exception tests have been passed <u>in line with national policy and guidance.</u> c) In the case of proposals in flood zone 2, 3a, 3b, sites greater than 1ha in flood zone 1, with an otherwise identified flood risk, or areas susceptible to Surface Water Flooding (as identified in the SFRA maps), Planning application(s) have been accompanied by a Flood Risk Assessment <u>in line with national policy and guidance.</u> 	<p>Necessary modification on SuDs to align with national policy</p> <p>Necessary modifications to align with national policy</p>	

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			<p>d) It is set back a minimum of 8 metres from riverbanks and/or existing flood defence infrastructure (measured from the top of the riverbank at the point at which the bank meets the level of surrounding land).</p> <p>e) Finished floor levels are set 300mm above the climate change flood level (as defined in the SFRA).</p> <p>f) It would not increase the risk of flooding to the site or elsewhere its neighbours or in. Mitigation measures to alleviate address (such as Sustainable Drainage Systems, Nature Based solutions or Natural Flood Management) will be implemented. such risks <u>should be in line with guidance from both the Lead Local Flood Authority and Environment Agency depending on the source of flood risk.</u></p> <p>g) Any increase in built footprint within the fluvial Flood Zone 3a (inclusive of the climate change flood extent) is compensated for from a flood storage perspective on a level for level, volume for volume basis.</p> <p>h) It does not result in the culverting of main rivers.</p> <p>i) It will result in the de-culverting of main river channels where applicable, subject to demonstrating that flood risk will not be increased elsewhere.</p> <p><u>j) Sustainable drainage systems are installed which follow the drainage hierarchy of:</u></p>		

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			<p><u>i. storing rainwater for later re-use;</u></p> <p><u>ii. use infiltration techniques;</u></p> <p><u>iii. attenuate rainwater in ponds or open water features for later gradual release;</u></p> <p><u>iv. discharge rainwater directly to a watercourse;</u></p> <p><u>v. discharge rainwater to a land drain, highway drain or surface water sewer;</u></p> <p><u>vi. discharge rainwater to a combined sewer.</u></p> <p><u>Development should avoid the use of underground tanks and conveyance, except when all other reasonable alternatives to provide a sustainable drainage solution have been exhausted, any discharge of surface water to a watercourse or sewer system is not to exceed pre-development (greenfield) runoff rates or a maximum of 2l/s/ha whichever is lower</u></p> <p>Key supporting documents</p> <p>Strategic Flood Risk Assessment – Level 1 2024</p> <p>Surface Water Management Plan 2011</p> <p>Epsom and Ewell Climate Change Action Plan 2020.</p> <p>Flood Risk Regulations 2009</p> <p>Flood Water Management Act 2010</p> <p>National and Coastal Erosion Risk Management Strategy 2020</p> <p>EA FCERM Roadmap to 2026</p> <p>UK Environment Act 2021</p> <p>UK Climate Change Adaptation Policy 2021</p> <p>UK Climate Risk Assessment 2022</p> <p>Surrey County Council Preliminary Flood Risk Assessment 2011</p>		

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			<p>Surrey Local Flood Risk Management Strategy 2017</p> <p>Planning Practice Guidance – Flood Risk and Coastal Change 2022</p> <p><u>National standards for sustainable drainage systems (SuDS) 2025</u></p> <p>National Planning Policy Framework</p> <p>Thames Catchment Flood Management Plan 2009</p> <p>Thames River Basin District Flood Risk Management Plan 2022</p> <p>Surrey County Council Sustainable Drainage System Design Guidance</p>		
MM87	126-127	Policy S17	<p>8.4. New or improved infrastructure must be 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 to ensure this can be achieved. For new development, the provision of or funding towards new infrastructure will be secured through planning obligations (S106) and/or the Community Infrastructure Levy (CIL). <u>Phasing conditions could be used where necessary to align the occupation of development with delivery of off-site infrastructure upgrades.</u></p> <p>8.5. 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. <u>The loss of open space, social infrastructure and other community facilities as defined in the glossary, are considered under policies DM19 and DM20. Developers must provide evidence to this effect that consultation with an appropriate range of service providers and the community has taken place.</u></p> <p>8.7. The delivery of infrastructure will be funded through a combination of mechanisms, which will include the use of Community Infrastructure Levy (CIL) funds. The council annually publishes an Infrastructure Funding Statement that sets</p>	<p>Modified for clarity and effectiveness to be clear that the policy applies to certain development and that funding needs to be secured and therefore should be set out.</p> <p>Delete wording regarding funding which needs to be within the policy itself to be effective</p> <p>Modified to clarify that infrastructure provision could be phased for large development and</p>	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			<p>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.</p> <p>Policy S17: Infrastructure Delivery</p> <ol style="list-style-type: none"> 1) <u>Development proposals, including those allocated within this plan which give rise to a need for infrastructure requirements, will be expected to mitigate their impact, whether individually or cumulatively. Where additional infrastructure capacity is required, this will be either 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 through off-site contributions. Such provision will be secured by legal agreements or via the Community Infrastructure Levy, through financial contributions via the infrastructure levy.</u> 2) Infrastructure must be provided at the appropriate time, prior to the development becoming occupied or becoming operational. <u>For larger developments, infrastructure may need to be phased and appropriate delivery of infrastructure should be agreed on a site by site basis. to ensure that this requirement can be met.</u> 3) Development of new infrastructure, in particular infrastructure projects identified in the Infrastructure Delivery Plan, that meet needs of the borough and its communities will be permitted, subject to the consideration of other policies within this Local Plan. 	<p>aligned with infrastructure upgrades to ensure the policy is justified.</p> <p>Additional clarification in relation to loss of specific infrastructure</p> <p>Delete last sentence from 8.5 for clarity to ensure an effective policy</p> <p>Changes are necessary for clarity and effectiveness and to remove unnecessary duplication.</p> <p>Text modified to clarify that the policy applies to certain types of development and that funding needs to be secured and what</p>	

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			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.	mechanisms will be used to secure it Additional clarification in relation to loss of specific infrastructure	
MM88	128	Policy S18	<p>8.8. Green and blue infrastructure includes individual natural components that are connected into network fulfilling multi-functional roles with multiple benefits to the local community, economy and environment. Green features may include (but are not limited to) open space, parks, public and private gardens, woodlands, playing fields, allotments, trees, green roofs/walls and blue features may include rivers, streams, <u>footpaths and shared surfaces</u>, green and sustainable drainage systems.</p> <p>8.9. An integrated green and blue infrastructure network can encourage inward investment, help to improve mental and physical health and wellbeing, enhance biodiversity, and assist with climate change mitigation and adaptation.</p> <p><i>2 new paragraphs in-between para. 8.9 & 8.10:</i></p> <p><u>All development should contribute towards the provision, improvement, and maintenance of the green infrastructure network across the Borough where appropriate to do so. Whilst the Council will only expect 'major' development proposals to be designed in accordance with established, recognised green infrastructure standards, all developments can make a positive impact on the green</u></p>	<p>Text modified to clarify that future management arrangements should be secured to ensure the policy is effective</p>	No. The change introduces no further LSEs that may compromise European site integrity.

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			<p><u>infrastructure network and proposals will, be expected to make such provision at a scale that is commensurate with the development.</u></p> <p><u>Expanding and enhancing the green and blue infrastructure network will provide multiple benefits to the Borough as a whole, however, preserving its quality and condition for the long term requires effective management arrangements to be in place from the outset to ensure a successful and sustainable outcome is achieved. The most appropriate management option for a development will vary depending on the scale, location and green and blue infrastructure provided and must be agreed on a case-by-case basis.</u></p> <p>Policy S18: Green and Blue Infrastructure</p> <p>4- Development will be supported provided that:</p> <p>a) it protects and enhances the integrity, quality, connectivity and multi-functionality of the existing green and blue infrastructure network and individual sites and components of the network;</p> <p>b) it <u>protects and enhances the green and blue infrastructure network</u>, through provision of appropriate green or blue infrastructure features within the network; <u>Major developments must demonstrate that provision is in accordance with established, recognisable standards, including the National Model Design Code and the Natural England Green Infrastructure Framework.</u></p>	<p>Modified for effectiveness with additional text to clarify and emphasise the connectivity to the wider network beyond the site</p> <p>Modification to c) to make clear that loss should be replaced</p>	

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			<p>c) any <u>loss or</u> adverse impacts on the green <u>and blue</u> infrastructure network are fully mitigated through the <u>replacement</u> / provision of green infrastructure <u>of equivalent or better value</u> on-site or, where feasible, through appropriate off-site compensatory measures; and</p> <p>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.</p> <p>2) Development proposals that would result in the loss or harm of green and blue 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</p> <p><u>Key Supporting Documents</u></p> <p><u>National Model Design Code</u></p> <p><u>Natural England Green Infrastructure Framework</u></p> <p>Surrey County Council Green and blue Infrastructure: best practice case studies</p> <p><u>Natural England Green Infrastructure Framework</u></p>	<p>Modified for effectiveness for relevant supporting documents added including Natural England's GI Framework</p> <p>Relevant supporting documents added for consistency and to ensure the policy is positively prepared</p>	
MM89	129-131	Policy DM19	Policy DM19 – Open Spaces, <u>Outdoor</u> Sport and Recreation	Modified to clarify that the policy applies to	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			<p>8.11. This policy covers formal and informal open spaces, outdoor and indoor sports land/facilities and ancillary buildings/recreational facilities, allotments and equipped areas of play.</p> <p>8.12. Open spaces often have a multi-functional role, providing a range of leisure and recreational opportunities, making a valuable contribution to health and wellbeing, being havens for biodiversity, 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 SUDS.</p> <p>8.13. The council's evidence base studies have found that generally there is a good range of accessible public open spaces, sports facilities and playing pitches within the borough. These are greatly valued by residents and attract many users from beyond the borough's boundaries. The studies have also found that there is a need for new/improved public open space provision in certain areas of the borough and there is demand for additional sporting facilities.</p> <p>8.14. The purpose of this policy is to ensure that the range and quality of open spaces, outdoor sport and recreation provision is maintained and improved where needs are identified, to ensure it meets the needs of the communities they serve. <u>Opportunities to achieve wider community use of facilities for outdoor sport and recreation, for example on educational sites, will be sought through the utilisation of measures such as Community Use Agreements (CUA).</u></p> <p>8.15. Existing open spaces, sport and recreational buildings and land, including playing fields, will be safeguarded in accordance with national policy. The general expectation <u>is that such land should not be built on unless it is clearly shown to be</u></p>	<p>outdoor sports and moved reference to indoor facilities to DM20 to ensure consistency with national policy</p> <p>Other modifications for clarity and effectiveness</p>	

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			<p><u>surplus to requirements, or proposals will provide an equivalent or better provision in a suitable location, or the proposal is for alternative sports and recreational provision the benefits of which clearly outweigh the loss of the former use. will be that proposals affecting this type of existing infrastructure will include provision for equivalent or better quality provision.</u> Open spaces designated as Local Green Space (as defined on the Policies Map) have the greatest protection and will be afforded the same level of protection consistent with areas within the Green Belt.</p> <p>8.16. <u>Where appropriate, A</u>ll new development is expected to contribute towards the provision/<u>maintenance</u> (and where appropriate, maintenance) of infrastructure, which includes open spaces, sports and recreational facilities.</p> <p>Policy DM19: Open Spaces, <u>Outdoor</u> Sport and Recreation</p> <p>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.</p> <p>2) Proposals for new and improved, refurbished, replacement or extended <u>outdoor sports/facilities</u> indoor and ancillary buildings built sport and recreational facilities must be of high quality, and optimise accessibility to all users <u>and where appropriate, maximise wider community benefit through the utilisation of measures such as community use agreements.</u></p> <p>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 community infrastructure levy, or on-site provision. Where a development is required to make on-site provision, this must</p>	<p>Modified to clarify that the policy applies to outdoor sports</p> <p>For conciseness, substituted open space with provision in criteria 3, removed reference to audit in criteria 3 in order to future proof the</p>	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>be an integral part of the development and have in place appropriate long term stewardship arrangements to secure the quality of the open space <u>this provision</u> in perpetuity.</p> <p>4) <u>Provision standards should be</u> Development proposals that would result in a net increase in the number of residential units are required to provide open space in accordance with the Fields in Trust benchmark standard (or any future equivalent standard). However, the council will negotiate on a site-by-site basis the type of open space provision where other typologies may be more appropriate or desirable. having regard to the most up to date Open Space Audit.</p> <p>5) Proposals which result in a loss of open space and/or <u>outdoor</u> sport and recreational buildings/land will only be considered where supported by robust evidence and will be assessed in line with national policy.</p> <p>6) Areas designated as Local Green Space (as defined on the Policies Map) will be safeguarded from development other than in very special circumstances where the potential harm to the Local Green Space and the purposes of including land within it is clearly outweighed by other considerations. Any proposed improvements or enhancements which involve development will be assessed in accordance with national policy on proposals affecting the Green Belt.</p> <p><u>Key Supporting Documents</u></p> <p>Open Space Audit (2024) Playing Pitch Strategy (2021)</p>	<p>policy. Changes made to ensure the policy is consistent with national policy and effective</p> <p>Title for supporting documents amended and additional document added for consistency</p>	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Sports Facilities Assessment (2020) <u>Epsom and Ewell Infrastructure Delivery Plan</u>		
MM90	132-133	Policy DM20	<p>Policy DM20 – <u>Social Infrastructure and Community and Cultural Facilities</u></p> <p><u>8.20. Social infrastructure and community and cultural facilities play a vital role in supporting social well-being in the borough and it is therefore important that there are sufficient facilities to meet the needs of communities both now and in the future. Social infrastructure and community facilities include uses such as healthcare facilities, education facilities, childcare facilities, leisure centres/sports halls, community centres/halls, libraries, public houses, the voluntary sector, public service providers, places of worship and cultural buildings such as theatres and arts centres. Community and cultural facilities include uses such as community halls, theatres, places of worship, cultural buildings, schools, education facilities, GPs or health centres, dentists, libraries, civic centres, open space, sports venue indoor and outdoor sports facilities, and public houses.</u></p> <p><i>New paragraph in-between para. 8.21 and 8.22</i></p> <p><u>It is important to maximise the use of existing facilities given the limited land availability for new facilities. Proposals to enhance, upgrade and intensify the use of existing facilities will be supported, subject to the consideration of other policies within in this plan. The council will support proposals for facilities or “hubs” that accommodate a mix of community uses to enable the most efficient use spaces/facilities</u></p>	<p>Modified title for clarity and effectiveness</p> <p>Modified first paragraph to define what uses would be included under Social Infrastructure and Community facilities- this has also been reflected in the glossary</p> <p>Incorporated former parts of DM19- Indoor sports/leisure facilities into this policy</p> <p>Modified text for effectiveness to promote reuse and maximising use of existing facilities.</p>	No. The change does not introduce any new LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>8.22. New provision should be located in sustainable locations, ensuring good accessibility by a wide range of travel modes. <u>Buildings and facilities should be flexible and adaptable. Where appropriate Community Use Agreements (CUA) will be sought to achieve wider community use of facilities.</u></p> <p>8.23. The council will require any loss to be fully justified, with marketing undertaken in accordance with the requirements of Appendix 5- <u>unless the loss can be re-provided to an equivalent standard elsewhere within the borough or provision can be delivered in a different way, such as through estate rationalisation to deliver improved/modernised facilities.</u></p> <p>Policy DM20: <u>Social Infrastructure and Community and Cultural Facilities</u></p> <p>1) Planning permission will be permitted for new or extensions/<u>enhancements</u> to existing community and cultural facilities provided that:</p> <p>a) there is a demonstrable identified need;</p> <p>b) it is in a location that is well served by public transport and accessible by walking and cycling; and</p> <p>c) it is delivered in flexible and adaptable building/s which could accommodate other social infrastructure/<u>community</u> uses where practicable, to encourage efficient use of land through mixed use and increased public access-; <u>and</u></p>	<p>Additional text to promote community use agreements for wider community use to ensure policy is effective in this regard</p> <p>Modified text for clarity and effectiveness</p> <p>Social Infrastructure and Community facilities have been defined in the glossary</p> <p>Additional text to promote community use agreements for wider community use</p> <p>Added Sports Facilities Assessment under key supporting documents</p>	

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			<p>d) <u>where possible, it seeks to maximise wider community benefit through the utilisation of measures such as community use agreements.</u></p> <p>2) The council will only support the loss of existing community and cultural facilities where:</p> <p>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; and</p> <p>b) it has been vacant and actively marketed for a community use without success for at least 18 months; or</p> <p>c) it can be re-provided to an equivalent standard elsewhere within the borough or provision can be delivered in a different way.</p> <p>Key supporting documents</p> <p>Epsom and Ewell Infrastructure Delivery Plan <u>Sports Facilities Assessment (2020)</u></p>	Changes made to ensure policy is positively prepared and effective	
MM91	133	Policy DM21	Policy DM21 – Education Infrastructure	<p>Deleted</p> <p>Policy not necessary as covered by policy</p>	No. Policy deletion introduces no further LSEs that may

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>8.25. For its size, the borough contains a wide range of education infrastructure ranging from early years providers, primary and secondary schools in both the public and private sectors to further and higher education facilities.</p> <p>8.26. It is home to three further and higher education campuses, notably the University for the Creative Arts, North East Surrey College of Technology (NESCOT) and Laine Theatre Arts, in addition to 6th form facilities at schools that play a valuable role in supporting the social fabric and economic success of the borough and its residents.</p> <p>8.27. 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.</p> <p>8.28. The council will support investment in the existing educational infrastructure to ensure facilities continue to support changing needs and demands.</p> <p>8.29. 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.</p> <p>Policy DM21: Education Infrastructure</p>	DM20, remove to avoid duplication.	compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>1) Development proposals for the intensification and enhancement of established education facilities in the borough will be supported.</p> <p>2) Proposals which maximise the extended or multiple use of educational facilities for community or recreational use will be supported.</p> <p>Key supporting documents –</p> <p>→ Epsom and Ewell Infrastructure Delivery Plan</p>				
MM92	136	Policy DM22	8.38. Aerodrome safeguarding is a legal requirement to ensure the safe operation of aerodromes, such as Heathrow, and , Gatwick Airport <u>and Kenley Aerodrome</u> , is taken into account in the design of development. Aerodrome safeguarding considerations cover a number of aspects including tall structures, wind turbines and green infrastructure.			Modification to the supporting text to include Kenley Aerodrome recommended by Defence Infrastructure Organisation	No. The change introduces no further LSEs that may compromise European site integrity.
			8.40. The aerodrome safeguarding area extends to cover a zone broadly within 5530 km of the airports, covering much of the borough. The borough is also within the 30km wind turbine notification area. More information is available on the airports website, and applicants are encouraged to consult the technical aerodrome safeguarding advice notes or liaise directly with the airport operator for advice on proposed developments.			Amended safeguarding zone from 30km to 55km as recommended by Gatwick Airport	
MM93	139	Policy S1	Indicators	Annual Target / Plan Period Target	Data source	Modified to reflect increased housing supply and trajectory.	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no
			Net additional dwelling completions	Annual target – average of at least	Planning decisions and appeals		

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?	
				<p>TBC dpa in line with current trajectory. <u>152 dwellings per annum from years 1 to 4 (2022/23 – 2025/206) and 386 dwellings per annum for years 5 to 18 (2026/27 – 2039/40)</u></p> <p>Plan target – delivery of at least 4,700 <u>6,012</u> dwellings over the plan period (2022-2040)</p>	Monitoring data		Necessary for effectiveness	adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
			Annual Net delivery of Gypsy pitches permitted and completed	<p>at least <u>at least</u> 180 pitches over the Local Plan period (as per need identified in the GTAA)</p>	Planning decisions and appeals <u>that deliver additional gypsy and traveller pitches</u>			
				Monitoring data				
			<p>The amount of net employment floorspace permitted and completed each year</p>	<p><u>Plan target - at least 41,464 sqm of additional employment floorspace</u></p>	Planning decisions and appeals <u>that result in a loss or gain in employment floorspace</u>			

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?									
				Assess trends against identified needs in the HEDNA	Monitoring data <u>CoStar platform or similar real estate information company at local plan review stage</u>												
			The amount of net Change in retail floorspace permitted and completed each year	<u>No specific target</u> Assess trends against identified needs in the retail study	Planning decisions and appeals <u>that result in a net loss of retail floorspace</u> Monitoring data												
MM94	139	Policy S2	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Number of planning applications refused</td><td>n/a</td><td>Planning applications and appeals</td></tr><tr><td>Number of planning applications permitted that do not fully comply with</td><td><u>No specific targets</u> n/a</td><td>Planning applications and appeals</td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	Number of planning applications refused	n/a	Planning applications and appeals	Number of planning applications permitted that do not fully comply with	<u>No specific targets</u> n/a	Planning applications and appeals	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and
Indicators	Annual Target / Plan Period Target	Data source															
Number of planning applications refused	n/a	Planning applications and appeals															
Number of planning applications permitted that do not fully comply with	<u>No specific targets</u> n/a	Planning applications and appeals															

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
			policy requirements following a viability review.					no further LSEs that may compromise European site integrity are foreseen.						
MM95	140	Policy S3	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Number of residential schemes that comply with the policy requirements <u>Strategic Policy that will be monitored through indicators of more detailed DM policies</u></td><td>No specific targets n/a</td><td>Planning decisions and appeals <u>Authority Monitoring Report</u></td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	Number of residential schemes that comply with the policy requirements <u>Strategic Policy that will be monitored through indicators of more detailed DM policies</u>	No specific targets n/a	Planning decisions and appeals <u>Authority Monitoring Report</u>	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
Indicators	Annual Target / Plan Period Target	Data source												
Number of residential schemes that comply with the policy requirements <u>Strategic Policy that will be monitored through indicators of more detailed DM policies</u>	No specific targets n/a	Planning decisions and appeals <u>Authority Monitoring Report</u>												
MM96	140	Policy S4	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Regeneration of 13 strategic allocations in the town centre</td><td>Delivery of sites over Local Plan period in accordance with the trajectory.</td><td>Planning decisions and appeals Monitoring data</td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	Regeneration of 13 strategic allocations in the town centre	Delivery of sites over Local Plan period in accordance with the trajectory.	Planning decisions and appeals Monitoring data	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development
Indicators	Annual Target / Plan Period Target	Data source												
Regeneration of 13 strategic allocations in the town centre	Delivery of sites over Local Plan period in accordance with the trajectory.	Planning decisions and appeals Monitoring data												

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
			<u>Change in floorspace for town centre uses over the plan period</u>	<u>Plan period- an increase in floorspace for town centre uses.</u>	<u>Planning decisions and appeals</u> <u>Monitoring data</u>			proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.						
			<u>Implementation of proposals set out within the Local Cycling and Walking infrastructure Plan</u>	<u>Priority schemes delivered over the Local Plan period.</u>	<u>Infrastructure Delivery Plan</u>									
MM97	140	Site Allocation- SA1 to SA35	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of sites</td><td>To deliver sites over the Local Plan period in accordance with the trajectory.</td><td>Planning appeals and decisions Monitoring data</td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	Delivery of sites	To deliver sites over the Local Plan period in accordance with the trajectory.	Planning appeals and decisions Monitoring data	Delete Text not justified	No. Text deletion introduces no further LSEs that may compromise European site integrity.
Indicators	Annual Target / Plan Period Target	Data source												
Delivery of sites	To deliver sites over the Local Plan period in accordance with the trajectory.	Planning appeals and decisions Monitoring data												
MM98		SA1 Southern Gas Network Site	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 455 dwellings and a bespoke performing</u></td><td><u>Delivery of development by 2030 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u></td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 455 dwellings and a bespoke performing</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were
Indicators	Annual Target / Plan Period Target	Data source												
<u>Delivery of at least 455 dwellings and a bespoke performing</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u>												

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			<table><tr><td><u>arts centre for the Laine Theatre Arts</u></td><td></td><td><u>Monitoring data</u></td></tr><tr><td></td><td></td><td></td></tr></table>			<u>arts centre for the Laine Theatre Arts</u>		<u>Monitoring data</u>							anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
<u>arts centre for the Laine Theatre Arts</u>		<u>Monitoring data</u>													
MM99		SA2 Hook Road Car Park	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 145 dwellings</u></td><td><u>Delivery of development by 2030 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 145 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.	
Indicators	Annual Target / Plan Period Target	Data source													
<u>Delivery of at least 145 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>													

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
MM100		SA3 Solis House, 20 Hook Road	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of at least 20 dwellings</u></td><td><u>Delivery of development by 2030 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 20 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 20 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									
MM101		SA4 Bunzl, Hook Road	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of at least 35 dwellings</u></td><td><u>Delivery of development by 2027 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 35 dwellings</u>	<u>Delivery of development by 2027 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 35 dwellings</u>	<u>Delivery of development by 2027 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
					with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.						
MM102		SA5 Epsom Town Hall	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of at least 90 dwellings</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 90 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 90 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									
MM103		SA6 Hope Lodge Car Park	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td></td><td></td><td></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source				Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the
Indicators	Annual Target / Plan Period Target	Data source									

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM104		SA7 Former Police and Ambulance Station Site	Indicators <u>Delivery of at least 85 residential, nursing and dementia care bedrooms for the elderly</u>	Annual Target / Plan Period Target <u>Delivery of development by 2028 in accordance with the trajectory</u>	Data source <u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
							site integrity are foreseen.						
MM105		SA8 Epsom Clinic	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 30 dwellings</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM106		SA9 Depot Road and Upper High Street Car Park	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 100 dwellings and public car parking</u></td><td><u>Delivery of development by 2032</u></td><td><u>Planning appeals and decisions</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 100 dwellings and public car parking</u>	<u>Delivery of development by 2032</u>	<u>Planning appeals and decisions</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 100 dwellings and public car parking</u>	<u>Delivery of development by 2032</u>	<u>Planning appeals and decisions</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
				<u>in accordance with the trajectory</u>	<u>Monitoring data</u>		sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.						
MM107		SA10 79-85 East Street	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 34 dwellings</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 34 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 34 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
MM108		SA11 Finachem House	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of purpose built student accommodation to provide at least 90 student bedrooms or a scheme of at least 35 dwellings.</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of purpose built student accommodation to provide at least 90 student bedrooms or a scheme of at least 35 dwellings.</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of purpose built student accommodation to provide at least 90 student bedrooms or a scheme of at least 35 dwellings.</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									
MM109		SA12 Global House	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of at least 75 dwellings</u></td><td><u>Delivery of development by 2030 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 75 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 75 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?									
							proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.									
MM110		SA13 Swail House	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Refurbishment of Swail house to provide at least 45 dwellings</u></td><td><u>Delivery of development by 2028 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u></td></tr><tr><td><u>The construction of at least 45 specialist accommodation dwellings for the Royal National Institute of Blind People (RNIB)</u></td><td></td><td><u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Refurbishment of Swail house to provide at least 45 dwellings</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u>	<u>The construction of at least 45 specialist accommodation dwellings for the Royal National Institute of Blind People (RNIB)</u>		<u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source														
<u>Refurbishment of Swail house to provide at least 45 dwellings</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u>														
<u>The construction of at least 45 specialist accommodation dwellings for the Royal National Institute of Blind People (RNIB)</u>		<u>Monitoring data</u>														
MM111		SA14 60 East Street	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td></td><td></td><td></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source				Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the			
Indicators	Annual Target / Plan Period Target	Data source														

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2027 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM112		SA15 Corner of Kiln Lane and East Street (101b East Street)	Indicators <u>Delivery of at least 5 dwellings</u>	Annual Target / Plan Period Target <u>Delivery of development by 2029 in accordance with the trajectory</u>	Data source <u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
					site integrity are foreseen.						
MM113		SA16 Land at Kiln Lane	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 40 dwellings</u></td><td><u>Delivery of development by 2035 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 40 dwellings</u>	<u>Delivery of development by 2035 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 40 dwellings</u>	<u>Delivery of development by 2035 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									
MM114		SA17 Hatch Furlong Nursery	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the			
Indicators	Annual Target / Plan Period Target	Data source									

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2031 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>			integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM115		SA18 Land to the rear of Rowe Hall	Indicators	Annual Target / Plan Period Target	Data source		Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
			<u>Delivery of an extra care accommodation to provide at least 96 self contained apartments, staff and communal facilities</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>			

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
					site integrity are foreseen.						
MM116		SA19 7 Station Approach	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 8 dwellings</u></td><td><u>Delivery of development by 2028 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 8 dwellings</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 8 dwellings</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									
MM117		SA20 Esso Express, 26 Reigate Road	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the			
Indicators	Annual Target / Plan Period Target	Data source									

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
			<table><tr><td><u>Delivery of at least 10 dwellings</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			<u>Delivery of at least 10 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.			
<u>Delivery of at least 10 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM118		SA21 Richards Fields Car Park	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 7 dwellings</u></td><td><u>Delivery of development by 2030 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 7 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 7 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
					site integrity are foreseen.						
MM119		SA22 Etwell House, Station Road	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 20 dwellings</u></td><td><u>Delivery of development by 2028 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 20 dwellings</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 20 dwellings</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									
MM120		SA24 Garages at Somerset Close and	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the			
Indicators	Annual Target / Plan Period Target	Data source									

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
		Westmorland Close	<table><tr><td><u>Delivery of at least 7 dwellings</u></td><td><u>Delivery of development by 2030 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			<u>Delivery of at least 7 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.			
<u>Delivery of at least 7 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM121		SA25 64 South Street	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 6 dwellings</u></td><td><u>Delivery of development by 2030 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
							site integrity are foreseen.						
MM122		SA26 35 Alexandra Road	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 8 dwellings</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 8 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 8 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM123		SA27 22-24 Dorking Road	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the			
Indicators	Annual Target / Plan Period Target	Data source											

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Delivery of at least 18 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM124		SA28 63 Dorking Road	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
			<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?												
					site integrity are foreseen.												
MM125		SA30 Epsom General Hospital	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of at least 305 units if older people’s accommodation</u></td><td><u>Delivery of development by 2029</u></td><td><u>Planning appeals and decisions</u></td></tr><tr><td><u>Delivery of at least 24 key worker dwellings</u></td><td></td><td><u>Monitoring data</u></td></tr><tr><td></td><td></td><td></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 305 units if older people’s accommodation</u>	<u>Delivery of development by 2029</u>	<u>Planning appeals and decisions</u>	<u>Delivery of at least 24 key worker dwellings</u>		<u>Monitoring data</u>				Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source															
<u>Delivery of at least 305 units if older people’s accommodation</u>	<u>Delivery of development by 2029</u>	<u>Planning appeals and decisions</u>															
<u>Delivery of at least 24 key worker dwellings</u>		<u>Monitoring data</u>															
MM126		SA31 Land at West Park Hospital (South)	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td></td><td></td><td></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source				Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the						
Indicators	Annual Target / Plan Period Target	Data source															

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?							
			<table><tr><td><u>Delivery of at least 50 dwellings</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			<u>Delivery of at least 50 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>			integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.			
<u>Delivery of at least 50 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>												
MM127		SA32 Land at West Park Hospital (North)	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 180 dwellings</u></td><td><u>Delivery of development by 2032 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 180 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
Indicators	Annual Target / Plan Period Target	Data source												
<u>Delivery of at least 180 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>												

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
							site integrity are foreseen.						
MM128		SA33 Land at Land at Chantilly Way	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 30 dwellings</u></td><td><u>Delivery of development by 2031 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2031 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2031 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM129		SA34 Hook Road Arena	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 100 dwellings</u></td><td><u>Delivery of development by 2033</u></td><td><u>Planning appeals and decisions</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 100 dwellings</u>	<u>Delivery of development by 2033</u>	<u>Planning appeals and decisions</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 100 dwellings</u>	<u>Delivery of development by 2033</u>	<u>Planning appeals and decisions</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
				<u>in accordance with the trajectory</u>	<u>Monitoring data</u>			sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.						
			<u>Delivery of a new sports hub to include playing pitches, a new pavilion and changing facilities</u>	<u>Delivery of development by 2033</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u>									
MM130		SA35 Land at Horton Farm	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of at least 1,250 dwellings including some specialist accommodation</u></td><td><u>Delivery of development by 2040 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u></td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 1,250 dwellings including some specialist accommodation</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
Indicators	Annual Target / Plan Period Target	Data source												
<u>Delivery of at least 1,250 dwellings including some specialist accommodation</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u>												

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?			
			<u>Delivery of at least 10 gypsy and traveller pitches</u>	<u>Delivery by 2035</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		site integrity are foreseen.			
			<u>Delivery of community building</u>	<u>Delivery by 2035</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u>					
			<u>Delivery of a public park of approximately 7ha</u>	<u>Delivery by 2035</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u>					
MM131		SA36 25 Alexandra Road Epsom	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the
Indicators	Annual Target / Plan Period Target	Data source								

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Delivery of at least 11 dwellings</u>	<u>Delivery of development by 2036 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM132		SA37 Gainsborough Road Estate	Indicators <u>Delivery of at least 8 dwellings</u>	Annual Target / Plan Period Target <u>Delivery of development by 2032 in accordance with the trajectory</u>	Data source <u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
							site integrity are foreseen.						
MM133		SA38 Parking at 54 Gainsborough Road	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 6 dwellings</u></td><td><u>Delivery of development by 2031 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2031 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2031 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM134		SA39 85b Hook Road Epsom	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 6 dwellings</u></td><td><u>Delivery of development by 2037</u></td><td><u>Planning appeals and decisions</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2037</u>	<u>Planning appeals and decisions</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2037</u>	<u>Planning appeals and decisions</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
				<u>in accordance with the trajectory</u>	<u>Monitoring data</u>		sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.						
MM135		SA40 Land west of Ewell By-Pass	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 38 dwellings</u></td><td><u>Delivery of development by 2040 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 38 dwellings</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 38 dwellings</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
MM136		SA41 Conservative Club, Epsom Club and Church	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 28 dwellings</u></td><td><u>Delivery of development by 2038 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 28 dwellings</u>	<u>Delivery of development by 2038 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 28 dwellings</u>	<u>Delivery of development by 2038 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									
MM137		SA42 TK Maxx	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 17 dwellings</u></td><td><u>Delivery of development by 2039 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 17 dwellings</u>	<u>Delivery of development by 2039 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 17 dwellings</u>	<u>Delivery of development by 2039 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
							with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.						
MM138		SA43 Land R/O The Albion Public House (Mccaffertys Bar)	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 11 dwellings</u></td><td><u>Delivery of development by 2037 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 11 dwellings</u>	<u>Delivery of development by 2037 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 11 dwellings</u>	<u>Delivery of development by 2037 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM139		SA44 Spread Eagle	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td></td><td></td><td></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source				Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no
Indicators	Annual Target / Plan Period Target	Data source											

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Delivery of at least 22 dwellings</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM140		SA45 Auction House	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
			<u>Delivery of at least 10 dwellings</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
							site integrity are foreseen.						
MM141		SA46 Laine Theatre Arts	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 6 dwellings</u></td><td><u>Delivery of development by 2033 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2033 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2033 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM142		SA47 Eclipse Business Park, West Hill	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 23 dwellings</u></td><td><u>Delivery of development by 2036</u></td><td><u>Planning appeals and decisions</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 23 dwellings</u>	<u>Delivery of development by 2036</u>	<u>Planning appeals and decisions</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 23 dwellings</u>	<u>Delivery of development by 2036</u>	<u>Planning appeals and decisions</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
				<u>in accordance with the trajectory</u>	<u>Monitoring data</u>		sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM143		SA48 Cuddington Glade	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
			<u>Delivery of a 70 bed Care Home</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
MM144		SA49 Land off Cuddington Glade	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 50 dwellings</u></td><td><u>Delivery of development by 2032 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 50 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 50 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									
MM145		SA50 Land at Priest Hill	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 275 dwellings</u></td><td><u>Delivery of development by 2032 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 275 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 275 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?									
					with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.									
MM146		SA51 Downs Farm	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of at least 530 dwellings</u></td><td><u>Delivery of development by 2035 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr><tr><td><u>Delivery of a new specialist school of up to 2.5ha</u></td><td><u>Delivery of development by 2035 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 530 dwellings</u>	<u>Delivery of development by 2035 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	<u>Delivery of a new specialist school of up to 2.5ha</u>	<u>Delivery of development by 2035 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source												
<u>Delivery of at least 530 dwellings</u>	<u>Delivery of development by 2035 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>												
<u>Delivery of a new specialist school of up to 2.5ha</u>	<u>Delivery of development by 2035 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>												
MM147	140	Policy S5 Housing Mix and Type	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td></td><td></td><td></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source				Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no			
Indicators	Annual Target / Plan Period Target	Data source												

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?			
			Annual Cumulative housing mix delivery (and cumulatively over the plan period) for market housing	Approximate proportions: 1 bed – 10% 2 bed – 35% 3 bed – 35% 4 bed – 20%	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.			
			Annual Cumulative housing mix delivery (and cumulatively over the plan period) affordable home ownership	Approximate proportions: 1 bed – 20% 2 bed – 40% 3 bed – 30% 4 bed – 10%	<u>Planning appeals and decisions</u> <u>Monitoring data</u>					
			Annual Cumulative housing mix delivery (and cumulatively over the plan period) affordable housing (rented)	Approximate proportions: 1 bed – 10% 2 bed – 35% 3 bed – 35% 4 bed – 20%	<u>Planning appeals and decisions</u> <u>Monitoring data</u>					
MM148	141	Policy S6 Affordable housing	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the
Indicators	Annual Target / Plan Period Target	Data source								

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
			Number of affordable dwellings granted consent	Approx 4250 <u>1675</u> over Local Plan Period	Planning decisions and appeals <u>Authority Monitoring Report</u>									
			Number of planning decisions including appeals allowing a lower level of affordable provision than set out in the policy not compliant with policy S6.	n/a	Planning decisions and appeals									
			Number of affordable home completions (and as a % of total net completions)	n/a	Planning decisions and appeals Authority Monitoring Report									
			Number of households on the Housing Register	Reducing over the plan period	Housing register									
MM149	142	Policy S7 Specialist housing	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Number of planning decisions including</td><td>In line with site allocations and all</td><td>Planning appeals and decisions</td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	Number of planning decisions including	In line with site allocations and all	Planning appeals and decisions	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the
Indicators	Annual Target / Plan Period Target	Data source												
Number of planning decisions including	In line with site allocations and all	Planning appeals and decisions												

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			appeals allowing specialist accommodation	other proposals consistent with the requirements of policy S7.	<u>Authority Monitoring Report</u>		integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
			Number of specialist dwellings lost	No net loss of plan period.	Planning appeals and decisions <u>Authority Monitoring Report</u>		
			Number of additional specialist dwellings and bedrooms	<u>n/a Increase in specialist accommodation over the plan period to assist in meeting identified needs</u> <u>Elderly and Extra Care</u> <u>Student accommodation</u>	Completions, planning appeals and decisions <u>Authority Monitoring Report</u>		
MM150	143	Policy S8 Gypsies, Travellers and	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
		Travelling Showpeople	Number of pitches permitted via planning decisions including appeals	18 gypsy pitches over the plan period	Planning decisions and appeals			HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
			Number of pitches lost via planning decisions including appeals	No net loss of pitches over the plan period	Planning appeals and decisions			
MM151	143	Policy S9 Economic Development	Indicators	Annual Target / Plan Period Target	Data source		Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
			<u>Loss/gain of employment floorspace in Epsom Town Centre</u>	<u>No net loss over plan period.</u>	<u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u>			
			Increase in floorspace in economic use at	34,500sqm of additional floorspace to be delivered on	Planning decisions and appeals			

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			the Strategic Employment Sites	strategic employment sites across the plan period				site integrity are foreseen.
			Loss of floorspace in economic use outside of the Strategic Employment Sites	Assess trends	Planning decisions and appeals			
			<u>Loss/gain of floorspace and land in use by the racecourse and racehorse training sector</u>	<u>No net loss over plan period.</u>	<u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u>			
			<u>Loss/gain of floorspace and land in use the creative and cultural sector and further and higher education providers</u>	<u>No net loss over plan period.</u>	<u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u>			

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM152	143	Policy S10 Retail Hierarchy and Network	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Number of planning decisions including appeals allowing main town centre uses outside of the centres	Assess trends <u>No specific target. Monitoring Only</u>	Planning decisions and appeals		
MM153	143	Policy DM4 Primary Shopping Areas and Retail Frontages	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Planning permissions approved in the town centre for appropriate town centre uses (as defined in the NPPF)	Assess trends <u>No specific target. Monitoring Only</u>	Planning decisions and appeals		
MM154	143	Policy DM5 Edge of Centre or Out of	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
		Centre Proposals	Number of planning decisions including appeals allowing main town centre uses outside of the centres	Assess trends <u>No specific target.</u> <u>Monitoring Only</u>	Planning decisions and appeals									
MM155	144	Policy DM6 Edge of Centre or Out of Centre Proposals	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Number of planning decisions including appeals allowing appropriate uses within the neighbourhood parade</td><td>Assess trends <u>No specific target.</u> <u>Monitoring Only</u></td><td>Planning decisions and appeals</td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	Number of planning decisions including appeals allowing appropriate uses within the neighbourhood parade	Assess trends <u>No specific target.</u> <u>Monitoring Only</u>	Planning decisions and appeals	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
Indicators	Annual Target / Plan Period Target	Data source												
Number of planning decisions including appeals allowing appropriate uses within the neighbourhood parade	Assess trends <u>No specific target.</u> <u>Monitoring Only</u>	Planning decisions and appeals												
MM156	144	Policy DM7 Loss of Employment Land	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Annual commercial, business and service (Class E) floorspace change (and cumulatively over the plan period)</td><td><u>Plan target - at least 41,464 sqm of additional employment floorspace</u> Assess trends</td><td>Planning decisions and appeals</td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	Annual commercial, business and service (Class E) floorspace change (and cumulatively over the plan period)	<u>Plan target - at least 41,464 sqm of additional employment floorspace</u> Assess trends	Planning decisions and appeals	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping
Indicators	Annual Target / Plan Period Target	Data source												
Annual commercial, business and service (Class E) floorspace change (and cumulatively over the plan period)	<u>Plan target - at least 41,464 sqm of additional employment floorspace</u> Assess trends	Planning decisions and appeals												

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
							with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM157	144	Policy DM8 Racehorse Training Zone	Policy DM8 <u>Epsom Downs Racecourse and the Racehorse Training Industry</u> Racecourse Training Zone			Title amended to reflect change. Amended 'Racecourse' to 'Racehorse'. Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source		
			Loss of land to non-equestrian uses in the defined Racecourse <u>Racehorse Training Zone</u>	No loss of land to non-racehorse training uses in the Racecourse <u>Racehorse Training Zone</u>	Planning decisions and appeals		
MM158	144	Policy DM9 Visitor Accommodation				Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source		
			Planning permissions or appeals granted for visitor accommodation (number of units and bedspaces)	No specific target. <u>Monitoring only</u> Assess trends	Planning decisions and appeals		

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Planning permissions or appeals granted for the loss of visitor accommodation (number of units and bedspaces)	<u>No specific target.</u> <u>Monitoring only</u> Assess trends	Planning decisions and appeals			
MM159	145	Policy S11 Design	Policy S11 Design <u>and Heritage</u>				Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source			
			Planning permissions refused based on the policy	<u>No specific target.</u> <u>Monitoring Only</u> Assess trends	Planning decisions and appeals			
MM160	145	Policy S12 Amenity Protection	Policy S12 <u>DM24</u> Amenity Protection				Title change to reflect the policy Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source			
			Planning permissions refused based on the policy	<u>No specific target.</u> <u>Monitoring Only</u> Assess trends	Planning decisions and appeals			
MM161	145	Policy DM10 Building Emissions Standards	Policy DM10 Building Emissions <u>and Energy</u> Standards				Title change & additional indicator Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source			
			Planning permissions <u>for residential use</u> approved supported	All <u>residential</u> <u>planning applications</u> <u>relevant</u> planning	Planning decisions and appeals			

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			by an appropriate Energy Assessment	applications are accompanied by an Energy Assessment <u>demonstrating policy requirements can be met.</u>				
			<u>Planning permission for non residential developments achieving BREEAM Excellent or any equivalent new standard</u>	<u>All new non-residential developments achieving BREEAM Excellent or any equivalent new standard</u>	<u>Planning decisions and appeals</u>			
MM162	146	Policy DM12 Health Impact Assessment	Indicators	Annual Target / Plan Period Target	Data source		Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Number of planning applications that include a health Planning permissions inclusion of an impact assessment, if required.	<u>All eligible applications to include a permissions include a health impact assessment, if required.</u> <u>No specific target, monitoring only.</u>	<u>Planning decisions and appeals</u> <u>ONS Health Data</u>			

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM163	146	Policy S13 Preserving identity of place with heritage	<div><div><div><div>Indicators</div><div>Not gain/loss of listed buildings</div><div>Number of listed buildings at risk</div></div><div><div>Annual Target / Plan Period Target</div><div>No loss of designated heritage assets</div><div>No increase in number of Listed Buildings identified as at risk</div></div><div><div>Data source</div><div>Planning decisions and appeals</div><div>Buildings at risk register</div></div></div></div>			Policy deleted, monitoring indicator no longer necessary	No. Policy deletion introduces no further LSEs that may compromise European site integrity.
MM164	146	Policy DM13 Development Impacting Heritage Assets	<div><div><div><div>Indicators</div><div>Not gain/loss of listed buildings</div><div>Number of <u>nationally</u> listed buildings at risk</div></div><div><div>Annual Target / Plan Period Target</div><div>No loss of designated heritage assets</div><div>No loss of designated heritage assets</div></div><div><div>Data source</div><div>Planning decisions and appeals</div><div>Planning decisions and appeals</div></div></div></div>			Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
MM165	146	Policy DM14 Shopfronts, new indicator	<div><div><div><div><u>Indicators</u></div><div><u>Planning appeals where the council refused permission for shopfronts for</u></div></div><div><div>Annual Target / Plan Period Target</div><div><u>No appeal decisions allowed relating to shopfront design.</u></div></div><div><div>Data source</div><div><u>Planning decisions and appeals</u></div></div></div></div>			Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
			<u>being contrary to the council's shopfront policy</u>										
MM166	146-147	Policy DM15 Green Belt	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td>Number of planning decisions, including appeals, granting permission for inappropriate development in the Green Belt, where very special circumstances that outweigh harm have not otherwise been identified</td><td>Assess trends <u>No specific target, monitoring only</u></td><td>Planning decisions and appeals</td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	Number of planning decisions, including appeals, granting permission for inappropriate development in the Green Belt, where very special circumstances that outweigh harm have not otherwise been identified	Assess trends <u>No specific target, monitoring only</u>	Planning decisions and appeals	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
Indicators	Annual Target / Plan Period Target	Data source											
Number of planning decisions, including appeals, granting permission for inappropriate development in the Green Belt, where very special circumstances that outweigh harm have not otherwise been identified	Assess trends <u>No specific target, monitoring only</u>	Planning decisions and appeals											
MM167		Policy DM16 Landscape Character (New indicator under DM15)	<u>Policy DM16 Landscape Character</u> <table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Planning applications and appeals within Area of great landscape value</u></td><td><u>No appeal decisions allowed for major development relating</u></td><td><u>Planning decisions and appeals</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Planning applications and appeals within Area of great landscape value</u>	<u>No appeal decisions allowed for major development relating</u>	<u>Planning decisions and appeals</u>	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Planning applications and appeals within Area of great landscape value</u>	<u>No appeal decisions allowed for major development relating</u>	<u>Planning decisions and appeals</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
				to the landscape character policy				
MM168	147	Policy S14 Biodiversity and Geodiversity	Indicators	Annual Target / Plan Period Target	Data source		Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Condition status of SSSIs	<u>No Specific Target</u> Improvements to condition of SSSIs in line with targets in Local Nature Recovery Strategy	Site surveys			
			Condition status of SNCI	<u>No Specific Target</u> Improvements in condition status	Surveys and DEFRA returns			
MM169	147	Policy S45 DM25– Biodiversity Net Gain	Indicators	Annual Target/Plan Period Target	Data source			No. The change introduces no further LSEs that may compromise European site integrity.
			Percentage of major planning applications delivering at least 10% biodiversity net gain	All qualifying development obligated to achieving at least 10% biodiversity net gain or 20% where	Planning decisions and appeals			

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
				specified in a site allocation policy			
MM170	147	Policy DM17 Trees, Woodlands and Hedgerows	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			New development proposals including landscape plans	All relevant qualifying planning applications to include appropriate landscape plans	Surveys and DEFRA returns		
MM171	147	Policy S16 Flood Risk and Sustainable Drainage	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Number of planning permissions granted contrary to Environment Agency advice on flooding and water grounds	No specific target. Number of planning applications permitted or appeals allowed contrary to advice of the Environment Agency	Planning decisions and appeals		
MM172	148	Policy DM18 Pollution and	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. The change introduces no further LSEs that may

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?									
		Contaminat ion	Number of planning decisions including appeals allowing development that is not in accordance with this policy	<u>No specific target.</u> Number of relevant planning applications that are not in accordance with the policy	Planning decisions and appeals			compromise European site integrity.									
MM173	148	Policy S17 Infrastructu re Delivery (additional indicator)	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of infrastructure schemes identified in the IDP as being delivered in years 1-5</u></td><td><u>Delivery of infrastructure achieved within anticipated timeframe.</u></td><td><u>Infrastructure Delivery Plan</u> <u>Engagement with infrastructure providers</u> <u>Authority Monitoring Report</u></td></tr><tr><td><u>Delivery of infrastructure schemes identified in the IDP as being delivered 'across all years'.</u></td><td><u>Delivery of infrastructure to support new development.</u></td><td><u>Infrastructure Delivery Plan</u> <u>Engagement with infrastructure providers</u></td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of infrastructure schemes identified in the IDP as being delivered in years 1-5</u>	<u>Delivery of infrastructure achieved within anticipated timeframe.</u>	<u>Infrastructure Delivery Plan</u> <u>Engagement with infrastructure providers</u> <u>Authority Monitoring Report</u>	<u>Delivery of infrastructure schemes identified in the IDP as being delivered 'across all years'.</u>	<u>Delivery of infrastructure to support new development.</u>	<u>Infrastructure Delivery Plan</u> <u>Engagement with infrastructure providers</u>	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
Indicators	Annual Target / Plan Period Target	Data source															
<u>Delivery of infrastructure schemes identified in the IDP as being delivered in years 1-5</u>	<u>Delivery of infrastructure achieved within anticipated timeframe.</u>	<u>Infrastructure Delivery Plan</u> <u>Engagement with infrastructure providers</u> <u>Authority Monitoring Report</u>															
<u>Delivery of infrastructure schemes identified in the IDP as being delivered 'across all years'.</u>	<u>Delivery of infrastructure to support new development.</u>	<u>Infrastructure Delivery Plan</u> <u>Engagement with infrastructure providers</u>															

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
					<u>Authority Monitoring Report</u>		
			<u>Delivery of infrastructure required by Site Allocation policies</u>	<u>Infrastructure delivered to support new development.</u>	<u>Planning decisions.</u> <u>Infrastructure Delivery Plan</u> <u>Engagement with infrastructure providers</u> <u>Authority Monitoring Report</u>		
			<u>Local Cycling and Walking Infrastructure Plan (LCWIP) and Local Street Improvements (LSI).</u>	<u>No specific target.</u> <u>Priority LCWIP and LSI projects progressed over the Local Plan period.</u>	<u>Infrastructure Delivery Plan</u> <u>Authority Monitoring Report</u>		
			<u>Primary care facility at Horton Farm (SA35) or an equivalent financial contribution towards off-site provision of new or improvement</u>	<u>Estimated delivery date 2032 to 2037.</u>	<u>Planning Applications</u> <u>Infrastructure Delivery Plan</u>		

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>to existing health facilities</u>		<u>Authority Monitoring Report</u>			
			<u>GP practice extensions / redevelopment / reconfiguration as needed</u>	<u>No specific target. Improvements to be delivered over plan period dependent upon need.</u>	<u>Infrastructure Delivery Plan</u>			
			<u>New Sports Hub for the borough to include playing pitches (grass and artificial), a new pavilion and changing facilities. Provision at site allocation SA34</u>	<u>Estimated to be delivered between 2032 and 2037</u>	<u>Planning Applications</u> <u>Infrastructure Delivery Plan</u> <u>Authority Monitoring Report</u>			
MM174	148	Policy S18 Green and Blue Infrastructure	Indicators	Annual Target / Plan Period Target	Data source		Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Number of planning decisions including appeals that secure the provision of green infrastructure through new development	<u>No specific targets. Monitoring only. Assess trends</u>	Planning decisions and appeals			

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Number of planning decisions including appeals allowing the loss of existing green infrastructure	No <u>net</u> loss of existing green infrastructure	Planning decisions and appeals			
MM175	149	Policy DM19 Open Space, Sport and Recreation, second indicator					Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source			
			Number of planning decisions including appeals which create new or enhance open space or sport and recreational buildings/land	<u>No specific targets. Monitoring only.</u> Assess trends	Planning decisions and appeals			
MM176	149	Policy DM20 Community and Cultural Facilities					Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source			
			Gains/losses of Use Class F1 and F2 facilities	<u>No specific targets. Monitoring only.</u> Assess trends	Planning decisions and appeals			
			Developer contributions securing social and community infrastructure	<u>No specific targets. Monitoring only.</u> Assess trends	Funding and space secured (authority monitoring report)			

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM177	149	Policy DM21 Education Infrastructure				Policy deleted, indicator no longer necessary	No. Policy deletion introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source		
			Number of planning decisions including appeals allowing additional education floorspace	Assess trends	Planning decisions and appeals		
MM178	149	Policy S19 Transport				Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source		
			Percentage of developments supported by a Travel Plan Applications supported by a Transport Assessment and on site plan to reduce car use and promote sustainable transport modes.	100% of qualifying developments All qualifying developments	Planning applications, appeal monitoring, decisions and appeals <u>Authority Monitoring Report</u>		
			Use of sustainable travel modes	Increase in travel to work	Census — every 10 years		

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
				Modal share by sustainable travel modes in 2034 Census over 2024 baseline.	SCC data on sustainable transport.		
			<u>Number of car club vehicles and cycles available for public cycle rental schemes</u>	<u>No specific target. Monitoring only.</u>	<u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u>		
			<u>Number of LCWIP priority schemes implemented</u>	<u>No specific target. Monitoring only.</u>	<u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u>		
			<u>Number of car free developments implemented</u>	<u>No specific target. Monitoring only.</u>	<u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u>		
MM179	153-160	Appendix 1: Glossary	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,			Replaced 'Community Facilities' in the glossary with 'Social Infrastructure and Community Facilities.	No. The change introduces no further LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>the voluntary sector, public service providers, places of worship and cultural facilities including theatres and arts centres.</p> <p><u>Social Infrastructure and Community Facilities:</u> Includes, but is not limited to, <u>healthcare facilities, education facilities, childcare facilities, leisure centres/sports halls, community centres/halls, libraries, public houses, the voluntary sector, public service providers, places of worship and cultural buildings such as theatres and arts centres.</u></p> <p><u>District Licencing Scheme:</u> Great crested newts are a European protected species. <u>District level licensing is an alternative approach to mitigation licensing for planning applications to develop sites which could affect great crested newts. The scheme is operated in accordance with Government Guidance.</u></p> <p><u>Essential Local Workers:</u> <u>Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers.</u></p> <p><u>Green and Blue Infrastructure (GI):</u> <u>Green and blue infrastructure includes individual natural components that are connected into network fulfilling multi-functional roles with multiple benefits to the local community, economy and environment. Green features may include (but are not limited to) open space, parks, public and private gardens, woodlands, playing fields, allotments, trees, green roofs/walls and blue features may include rivers, streams, footpaths and shared surfaces, green and sustainable drainage systems. A network of multi-functional</u></p>	<p>Additional entry in the Appendix to define District Licencing Scheme</p> <p>Essential local workers housing defined in the glossary which is captured under policy S5</p> <p>Amended definition to be consistent with S18</p> <p>New entry for effectiveness</p>	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<p>green and blue space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.</p> <p><u>High frequency bus corridor</u>: Sections of highway where bus services operate with a frequency of at least 3 bus services per hour, on average, for a weekday between the hours of 07:00 & 19:00.</p> <p><u>Parking Stress</u>: The measure of the saturation levels of parking in a defined area and expressed in percentage terms.</p> <p><u>Racecourse Area</u>: The track used by racehorses and the associated facilities, including the built area which constitutes the stables, stands, administration building, parade ring and hardstanding.</p> <p><u>Racehorse Training Yards</u>: Specialised Thoroughbred equestrian facilities where thoroughbred racehorses are stabled. Facilities can include stables, paddocks/turnout pens, tack rooms, horse walkers, staff accommodation and other specialised training equipment.</p> <p><u>Racehorse Movement Corridors</u>: Routes travelled by racehorses to and from training yards to access the racehorse training grounds.</p> <p><u>Racehorse Training Grounds</u>: Specialised Thoroughbred equestrian facilities designed to condition and / or stable thoroughbreds for racing. This includes gallops which are managed to provide a variety of surfaces and terrains that mimic race conditions.</p>	<p>New entry necessary in relation to policy S11</p> <p>New entry for effectiveness and consistency. Define Racehorse training terms in policy DM8</p> <p>New entry for effectiveness and consistency, Social Infrastructure and Community Facilities</p>	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?			
			<p>Social Infrastructure and Community Facilities: Includes, but is not limited to, <u>healthcare facilities, education facilities, childcare facilities childcare facilities, leisure centres/sports halls, community centres/halls, libraries, public houses, the voluntary sector, public service providers, places of worship and cultural buildings such as theatres and arts centres.</u></p> <p>Specialist Housing: Housing specifically designated to meet the identified needs of <u>specialised groups, such as the elderly, disabled or student population</u> elder people and people with support needs. It can include extra care housing.</p>	<p>defined consistent with DM20</p> <p>Modified to ensure effectiveness by using appropriate definition</p>				
MM180	162	Appendix 2: Housing Trajectory, page 162-163	See Appendix A1.	To include most up to date trajectory	No. The change introduces no further LSEs that may compromise European site integrity.			
MM181	169	Appendix 4: Vehicle Parking Standards, A4.1 third paragraph	<p><u>The car parking standards identified in this appendix are maximums.</u> In light of the above, there are likely to be situations where <u>lower levels of parking</u> 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).</p>		No. The change does not introduce any new LSEs that may compromise European site integrity.			
MM182	178	Table A5 Types of Use and Minimum	<table><tr><td>Policy DM8 – Racehorse Training Zone</td><td>Racehorse training <u>industry</u> or equestrian</td><td>18- 24 months</td></tr></table>	Policy DM8 – Racehorse Training Zone	Racehorse training <u>industry</u> or equestrian	18- 24 months	Modifications for effectiveness and consistency with amended policy	No. The change does not introduce any new LSEs that may compromise European site integrity.
Policy DM8 – Racehorse Training Zone	Racehorse training <u>industry</u> or equestrian	18- 24 months						

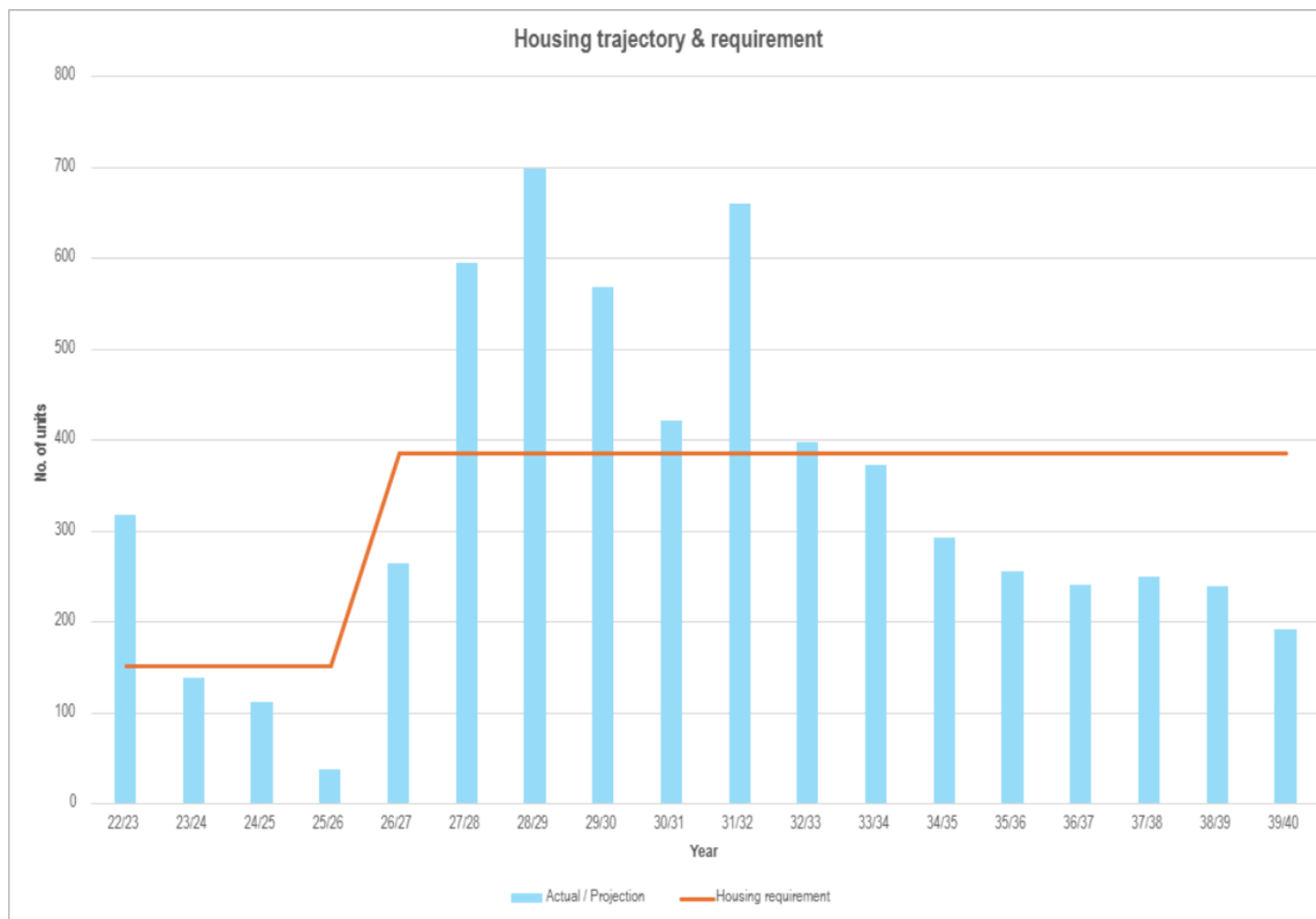
Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
		Marketing Periods			
MM183	185	Appendix 6: Guidance for Proposals Impacting Heritage Assets A6.2.1	<p>A6.2.1 Scheduled Ancient Monuments and Areas of High Archaeological Potential</p> <p>The Borough contains two Scheduled Ancient Monuments (SAM) - the site of Nonsuch Palace and its associated remains, and St Mary's Church Tower in Ewell. Additionally, there is one identified County Site of Archaeological Importance in the Borough - 'Diana's Dyke', a site close to Nonsuch Palace. All proposals will be expected to follow all National Government and County National and County Policy and Guidance regarding these sites. In the majority of instances, the advice of Surrey County Council should also be sought. <u>Scheduled Monument Consents are determined by Historic England and not local authorities.</u></p> <p>Within Areas of High Archaeological Potential, as identified on the Proposals Map, or outside of these areas on any major development site of 0.4ha or greater, applicants are required to undertake prior assessment of the possible archaeological significance of the site and the implications of their proposals, and may be required to submit, as a minimum, a desk-based assessment to accompany any application. Where desk-based assessment <u>is inconclusive, or</u> suggests the likelihood of archaeological remains, the Council will require the results of an archaeological evaluation in order to inform the determination of the application.</p>	Modification necessary for effectiveness	No. The change does not introduce any new LSEs that may compromise European site integrity.

Appendix A1: Housing Trajectory

SOURCE	No. of units	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	TOTAL
Completions (2022-2026)	605	317	139	112	37															605
Commitments (April 2026) - 671 with 10% lapse rate applied 604	604					200	200	204												604
Small windfall	385								35	35	35	35	35	35	35	35	35	35	35	385
Large windfall	333										37	37	37	37	37	37	37	37	37	333
URBAN SITES (20+)																				
SA1 - Southern Gas Network Site	456						225	116	115											456
SA2 - Hook Road Car Park	145								145											145
SA3 - Solis House, 20 Hook Road	20								20											20
SA4 - Bunzl, Hook Road	35					35														35
SA5 - Epsom Town Hall	90						50	40												90
SA6 - Hope Lodge Car Park	35										35									35
SA7 - Former Police and Ambulance Station Site	47						47													47
SA8 - Epsom Clinic	30							30												30
SA9 - Depot Road & Upper High Street Car Parks	100									50	50									100
SA10 - 79-85 East Street	34							34												34
SA11 - Finachem House, 2-4 Ashley Road	38							38												38
SA12 - Global House	75								75											75
SA13 - Swail House	45						45													45
SA14 - 60 East Street	30					30														30
SA16 - Land at Kiln Lane	40													40						40
SA17 - Hatch Furlong Nursery	30								15	15										30
SA18 - Land rear of Rowe Hall	96							96												96
SA22 - Etwelle House, Station Road	20						20													20
SA40 - Land west of Ewell By-Pass	38																	38		38
SA41 - Conservative Club, Epsom Club and Church	28																28		-	28
SA44 - Spread Eagle Shopping Centre	22																	22		22
SA47 - Eclipse Business Park, West Hill	23														23					23
SMALL URBAN SITES (5-19)																				
SA15 - Corner of Kiln Lane & East Street (101B East Street)	5							5												5
SA19 - 7 Station Approach, Stoneleigh	8						8													8
SA20 - Esso Express, 26 Reigate Road	10							10												10
SA21 - Richards Field Car Park	7								7											7
SA24 - Garages at Somerset Close & Westmorland Close	6								6											6
SA25 - 64 South Street, Epsom	6							6												6
SA26 - 35 Alexandra Road	8							8												8
SA27 - 22-24 Dorking Road	18							18												18
SA28 - 63 Dorking Road	6							6												6
SA36 - 25 Alexandra Road Epsom Surrey KT17 4BP	11														11					11
SA37 - Gainsborough Road estate, Epsom	8										8									8
SA38 - Parking at 54 Gainsborough Road	6									6										6
SA39 - 85b Hook Road, Epsom	8															8				8
SA42 - TK Maxx	17																	17		17
SA43 - Land R/O The Albion Public House (McCaffertys Bar)	11															11				11
SA45 - Auction House, Depot Road	10																	10		10
SA46 - Laine Theatre Arts	6											6								6
GREEN BELT RELEASE																				
SA31 - Land at West Park Hospital - South	50							50												50
SA32 - Land at West Park Hospital - North	180								60	60	60									180
SA33 - Land at Chantilly Way	30								15	15										30
SA34 - Hook Road Arena	100									40	40	20								100
SA35 - Horton Farm	1250									50	100	150	150	150	150	150	150	150	50	1250

SOURCE	No. of units	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	TOTAL
SA48 - Cuddington Glade	37							37												37
SA49 - Land off Cuddington Glade	45										45									45
SA50 - Land at Priest Hill	275								75	100	100									275
SA51 - Downs Farm	530									50	150	150	150	30						530
Actual / Projection		317	139	112	37	265	595	698	568	421	660	398	372	292	279 256	241	250	239	192	6052

Appendix A2: Housing trajectory & requirement



Habitats Regulations Assessment

Sustainability Appraisal

Strategic Environmental Assessment

Landscape Character Assessment

Landscape and Visual Impact Assessment

Green Infrastructure

Expert Witness

Ecological Impact Assessment

Habitat and Ecology Surveys

Biodiversity Net Gain



© Lepus Consulting Ltd

Eagle Tower

Montpellier Drive

Cheltenham

GL50 1TA

01242 525222

enquiries@lepusconsulting.com

www.lepusconsulting.com

CHEL TENHAM



Epsom & Ewell Local Plan 2022-2040

Examination in Public

Schedule of Proposed Post Hearings Additional Modifications

Introduction

The Additional Modifications set out in the tables below are set out for information and do not affect the soundness of the Local Plan and will not be considered by the appointed Local Plan Inspector.

The Modifications are expressed in the form of ~~strike through~~ for deletions and underlining for additions of text.

The page numbers and Paragraph numbering below refer to the Submission Local Plan and do not take account of the deletion or addition of text.

Schedule of Proposed Minor Modifications

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
AM1	6-8	Details of the Regulation 19 Representation	<p>Details of the Regulation 19 Representation</p> <p>1.1.—This Regulation 19 representation period is the next step in the plan making process. The purpose of the Regulation 19 stage is to provide an opportunity for representations to be made on the proposed submission local plan before it is examined by a Planning Inspector.</p> <p>1.2.—Further information, including frequently asked questions, on the Regulation 19 Stage is available on our website. You can also reach the website quickly by scanning the QR code:</p> <p>1.3.—The council consulted on a Regulation 18 draft Local Plan (2022-2040) in 2023 that was a detailed Local Plan containing strategic policies</p>	To reflect that the Proposed Submission Local Plan consultation (Regulation 19) has been undertaken and closed.

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			<p>(including draft site allocations) and development management policies.</p> <p>1.4. The Regulation 19 consultation stage is different to those undertaken previously:-</p> <ul style="list-style-type: none"> • This is the last stage of public engagement before submitting the Draft Plan to the Planning Inspectorate for examination. • This is a representation period on the finalised proposed Local Plan policies; earlier consultations sought views which had to be considered before the council finalised this draft Local Plan. • All responses received during the consultation period will be sent to the Planning Inspectorate. • Only representations on the soundness and legal compliance of the Plan can be made and it must be targeted to a specific policy or paragraph in the Draft Plan. Your representations will need to focus on the following: 	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			<ul style="list-style-type: none"> ○ Whether or not the plan is legally compliant (including Duty to Cooperate): ○ Whether the plan satisfies the tests of soundness by being: <ul style="list-style-type: none"> ▪ Positively prepared – being based on a strategy that aims to meet objectively assessed needs for development and infrastructure. ▪ Justified – being an appropriate strategy. ▪ Effective – being deliverable over the plan period based on effective joint working. ▪ Consistent with national policy – enabling the delivery of sustainable development in accordance with the NPPF. 1.5. Representations should be supported by evidence if possible and when making representations please clearly indicate which 	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			<p>policy, paragraph or page number you are referring to.—</p> <p>1.6.—In addition to the Local Plan, during the consultation period representations can also be made on changes to the Policies Map, the Sustainability Appraisal and the Equalities Impact Assessment.—</p> <p>1.7.—The consultation period starts on Friday 20 December 2024 until 23:59 on Wednesday 5 February 2025. Should you wish to make representations on the legal compliance or soundness of this document you must do so within the consultation period. Please submit your representations using the online forms which can be found on the Local Plan pages at https://epsom-ewell.inconsult.uk/Reg19LocalPlanConsultation. You can also reach the consultation portal by</p>	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			<p>scanning the QR code:</p>  <p>The flowchart consists of seven numbered steps in a vertical column, each with a corresponding description to its right. The steps are: 01 (green, GATHER EVIDENCE AND EARLY STAKEHOLDER ENGAGEMENT), 02 (blue, PUBLIC CONSULTATION ON DRAFT LOCAL PLAN (REGULATION 18)), 03 (orange, PUBLIC CONSULTATION ON PROPOSED SUBMISSION LOCAL PLAN (REGULATION 19)), 04 (green, SUBMIT LOCAL PLAN FOR EXAMINATION (REGULATION 22)), 05 (blue, EXAMINATION BY AN INDEPENDENT PLANNING INSPECTOR (REGULATION 24)), 06 (orange, PLANNING INSPECTOR'S REPORT (REGULATION 25)), and 07 (green, ADOPT THE LOCAL PLAN (REGULATION 26)). A callout box labeled 'WE ARE HERE' points to step 03. A red diagonal line is drawn across the entire flowchart from the top-left to the bottom-right.</p>	
AM2	9	Para 1.9	Once adopted, the Local Plan and its supporting Policies Map will form part of the Epsom and Ewell Development Plan together with other 'development	Typographical error

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			plan' documents such as the Surrey Minerals Development Plan, Surrey Waste Development Plan and any adopted Neighbourhood Plans.	
AM3	27	Para 3.45	3.45. 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) and the emerging Surrey County Council Net Zero Toolkit (2024).	To reflect that the Net Zero toolkit has been published.
AM4	29	Policy S3 key supporting documents	Key supporting documents <ul style="list-style-type: none"> • Epsom and Ewell Climate Change Study – Stage 1 (2022) • Local Plan Viability Assessment (2023) 	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			<ul style="list-style-type: none"> Emerging Surrey County Council Net Zero Toolkit (2024) 	
AM5	71	Para 5.7	The Local Plan Viability Assessment <u>2023</u> identifies that there is variation between the levels of affordable housing that can be delivered from greenfield sites and other sites (generally previously developed land) due to varying land values and, it is for this reason that the policy sets different policy affordable housing thresholds for greenfield sites and urban sites.	Date added for clarity and consistency
AM6	75	Policy DM1	<p>Policy DM1: Residential Space Standards</p> <p>1) Proposals for new residential dwellings (Use Class C3) will be permitted where:</p> <p>a) the internal space complies with or exceeds the nationally described space standards or any future equivalent.</p> <p>b) the minimum requirements for private outdoor space as set out below are satisfied:</p> <p>i) a 5 sq m balcony within flatted development accessible from the main habitable room</p> <p>ii) a dedicated private garden for houses.</p> <p>2) All dwellings will be required to be built to appropriate accessible and adaptable standards to</p>	So that the policy numbering is consistent with other policies.

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			<p>meet Building Regulations Part M4(2), or as subsequently amended, unless it can be demonstrated it would not be possible to do so due to site specific circumstances.</p> <p>3) On sites of 10 or more dwellings:</p> <p>ia) a minimum of 10% of new market dwellings will be required to meet Building Regulations wheelchair adaptable dwellings standard (M4(3)(a); unless it can be demonstrated it would not be possible to do so due to site-specific circumstances, and</p> <p>ii)b) a minimum of 20% of new affordable dwellings will be required to meet Building Regulations accessible compliance standard (M4(3)b) unless it can be demonstrated it would not be possible to do so due to site-specific circumstances or the Council's housing register identifies that there is insufficient demand.</p>	
AM7	77	Policy DM2 key supporting documents	<p>Key supporting documents</p> <ul style="list-style-type: none"> • Housing and Economic Development Needs Assessment (HEDNA) • Epsom and Ewell Self-Build and Custom • <u>Housebuilding Register</u> housing register 	Typographical error

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
AM8	79	Policy S7 – key supporting documents	Key supporting documents <ul style="list-style-type: none"> •Housing and Economic Development Needs Assessment (2023 HEDNA) •Surrey County Council – Planning Guidance for older people’s accommodation with care. •Surrey County Council - Planning Profile for accommodation with care for older people, Epsom and Ewell 2024 	Typographical error
AM9	82	Para 5.46	To help meet the additional need for sites, the council has sought to increase provision over the plan period through the allocation of a minimum of 10 pitches as part of the Horton Farm Allocation (Site Allocation SA35).	Typographical error
AM10	83	Para 5.51	It is expected that new pitches and plots should have adequate utility services, amenity space and parking, safe turning space and be in areas with reasonable access to schools, health services and local services. The impact of new sites on existing communities and how well proposals can be integrated is an important consideration. in the determination of applications for Gypsy and Traveller provision.	Typographical error

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
AM11	90	DM4 Key supporting documents	Key supporting documents <ul style="list-style-type: none"> • Retail and Commercial Leisure Needs Assessment (2020) • Retail and Commercial Leisure Needs Assessment Update (2021) • Housing and Economic <u>Development</u> Needs Assessment (20232) 	Typographical error
AM12	93	Para 6.21	Proposals at the neighbourhood parades 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. Sui Generis uses suited to in neighbourhood parades will normally be permitted unless they result in an over concentration of those uses.	Typographical error
AM13	103	Para 7.7	Overlooking from public rights of way, play areas and neighbouring properties should be taken into account in any development proposal. The layout and orientation of buildings should take advantage of sunlight and should not block daylight to habitable rooms, dominate or enclose neighbouring residences. There is an expectation that residential developments will have a separation distance of at least 20m between elevations (rear to rear), unless to it it can be demonstrated that this would not harm residential amenity.	Typographical error

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
AM14	105	Policy DM10 Key supporting documents	Key supporting documents <ul style="list-style-type: none"> •Emerging Surrey County Council Net Zero Carbon Toolkit (2024) •Epsom and Ewell Climate Change Study (2023) •Local Plan Viability Assessment (2024) 	<p>To reflect that the Net Zero toolkit has been published.</p> <p>Date added to documents for clarity and consistency</p>
AM15	124	Policy DM18	<p>1A. Soil Waste/Contaminated Land</p> <p>Where development is proposed on land known, or likely to be contaminated or affected by adjacent or related contamination, it will be permitted only when:</p> <p style="padding-left: 40px;">ia) A detailed technical assessment to assess the nature of the contamination has been undertaken (taking care to avoid the escape of contaminants); and</p> <p style="padding-left: 40px;">ib) the land can be made safe for the proposed use for the entirety of its lifetime, before the development is occupied;</p> <p>2B. Water Quality</p> <p>New development will be permitted where:</p> <p style="padding-left: 40px;">ia) It includes suitable arrangements for the disposal of foul water into a sewerage system at the nearest point of adequate capacity; and</p>	<p>So that policy numbering is consistent with other policies.</p>

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			<p>iib) It does not deteriorate the local water environment; or</p> <p>iiic) It includes well designed mitigation measures to ensure the local water environment does not deteriorate, both during construction and the lifetime of the development.</p> <p>3E. Air Quality</p> <p>All development proposals will be permitted where:</p> <p>ia) Their emissions will be as low as practicable; or</p> <p>iib) appropriate mitigation measures are put in place to reduce impacts to acceptable levels; and</p> <p>iiic) 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)</p> <p>4D. Noise and Vibration</p> <p>Development will be permitted where;</p>	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			<p>ia) The application for development can demonstrate it will not generate or (as the agent of change) expose itself to unacceptable noise or vibration; or</p> <p>iib) Where unacceptable noise and vibration is likely to occur, it incorporates attenuation measures to bring noise and vibration to acceptable levels.</p> <p>5E. Light</p> <p>Development including lighting will be permitted where the lighting is the minimum necessary for security, safety or working purposes, and will not impact on amenity as a result of glare or spillage, particularly in residential areas, areas of biodiversity interest, or the highway.</p> <p>6F. Odour</p> <p>All development proposals for new residential development must consider odour, fumes and dust emitted from existing land uses and implement appropriate mitigation to protect the amenity of future occupiers.</p> <p>New developments that will generate odour or fumes, must be carefully designed to include on-site mitigation</p>	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			and actively minimise impacts on neighbouring land uses.	
AM16	126	8.6	The council maintains an Infrastructure Delivery Plan (IDP) to assess the types, quantities, and locations of the existing infrastructure provision and that which is needed to meet future needs. This has helped to inform policies within this Local Plan. The council will continue to work in partnership with infrastructure providers and delivery agencies to ensure the IDP is regularly updated.	Typographical error
AM17	135	Policy S19	<p>Policy S19: Transport</p> <p>1) To ensure the delivery of a sustainable transport network, new development in the borough will:</p> <p style="padding-left: 40px;">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;</p> <p style="padding-left: 40px;">b) improve existing walking and cycling routes to local facilities, services, bus stops and railway stations;</p>	<p>So that the policy numbering is consistent with other policies.</p> <p>Typographical errors in Criteria 2b – delete duplicate text</p>

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			<p>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 4);</p> <p>d) meet the council's parking standards with consideration given to highway safety and congestion;</p> <p>e) consider establishing car clubs and cycle rental schemes or other similar sustainable transport schemes;</p> <p>f) provide facilities situated in convenient and easy to use locations that will increase the uptake of electric and other zero emission vehicles; and</p> <p>g) provide appropriate servicing to the site, including waste and recycling storage areas and accessible collection points for refuse vehicles.</p> <p>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</p>	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			<p>or residential developments of 50 homes or more) the council will require:</p> <p>a) planning applications to be accompanied by a Transport Assessment; and</p> <p>b) 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.</p> <p>3) Car free development will be encouraged in appropriate locations and where supported by evidence demonstrating that proposals would not lead to parking stress.</p> <p>Key supporting documents</p> <ul style="list-style-type: none"> • Surrey Local Transport Plan 4 (2022) • Epsom Town Centre Masterplan (2024) • Epsom and Ewell Local Cycling and Walking Infrastructure Plan (2024) • Surrey County Council - Transportation Development Planning: Good Practice Guide (2020) 	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification		Reason for Modification														
AM18	164	Appendix 3: Development Plan Policies to be superseded by the Local Plan (2022-2024) Core Strategy Policies	<table><tr><th>Core Strategy Policies</th><th>Replacement Policy in Epsom and Ewell Local Plan (2022-2040)</th></tr><tr><td>CS1 – Creating Sustainable Communities in the Borough</td><td>S2 Sustainable and Viable Development</td></tr><tr><td>CS2 – Green Belt</td><td>DM15: Green Belt</td></tr><tr><td>CS3 - Biodiversity and Designated Nature Conservation Areas</td><td>S14: Biodiversity and Geodiversity</td></tr><tr><td>CS4 - Open Spaces and Green Infrastructure</td><td>DM19: Open Spaces, <u>Outdoor Sport and Recreation Green Infrastructure</u> / S18 Green and Blue Infrastructure</td></tr><tr><td>CS5 – The Built Environment</td><td>S113: <u>Preserving identity of place with Design and heritage</u> / DM13 Development Impacting Heritage Assets</td></tr><tr><td>CS6 - Sustainability in New Developments</td><td>DM10: Building Emission and Energy Standards /</td></tr></table>		Core Strategy Policies	Replacement Policy in Epsom and Ewell Local Plan (2022-2040)	CS1 – Creating Sustainable Communities in the Borough	S2 Sustainable and Viable Development	CS2 – Green Belt	DM15: Green Belt	CS3 - Biodiversity and Designated Nature Conservation Areas	S14: Biodiversity and Geodiversity	CS4 - Open Spaces and Green Infrastructure	DM19: Open Spaces, <u>Outdoor Sport and Recreation Green Infrastructure</u> / S18 Green and Blue Infrastructure	CS5 – The Built Environment	S113: <u>Preserving identity of place with Design and heritage</u> / DM13 Development Impacting Heritage Assets	CS6 - Sustainability in New Developments	DM10: Building Emission and Energy Standards /	To include most up to date policy references and titles
Core Strategy Policies	Replacement Policy in Epsom and Ewell Local Plan (2022-2040)																		
CS1 – Creating Sustainable Communities in the Borough	S2 Sustainable and Viable Development																		
CS2 – Green Belt	DM15: Green Belt																		
CS3 - Biodiversity and Designated Nature Conservation Areas	S14: Biodiversity and Geodiversity																		
CS4 - Open Spaces and Green Infrastructure	DM19: Open Spaces, <u>Outdoor Sport and Recreation Green Infrastructure</u> / S18 Green and Blue Infrastructure																		
CS5 – The Built Environment	S113: <u>Preserving identity of place with Design and heritage</u> / DM13 Development Impacting Heritage Assets																		
CS6 - Sustainability in New Developments	DM10: Building Emission and Energy Standards /																		

Ref	Page(s)	Policy number/paragraph number	Proposed Modification		Reason for Modification
				DM11: Sustainable Water Use	
			CS7 – Housing Provision	S1: Spatial Strategy	
			CS8 – Broad Location of Housing Development	S1: Spatial Strategy	
			CS9 – Affordable Housing	Policy S6: Affordable Housing	
			CS10 – Gypsies, Traveller and Travelling Showpeople	Policy S8: Gypsies, Travellers and Travelling Showpeople	
			CS11 – Employment Provision	S1: Spatial Strategy DM7: Employment Land	
			CS12 – Meeting Community needs	DM20: <u>Social Infrastructure and Community and Cultural Facilities</u>	
			CS13 - Community, Cultural and Built Sports Facilities	DM19 Open Spaces, <u>Outdoor Sport and Recreation</u> / DM20: <u>Social Infrastructure and Community and Cultural Facilities</u>	
			CS14 – Epsom Town Centre	Policy S4: Epsom Town Centre	
			CS15 – Role of Local Centres	S10: Retail Hierarchy and Network	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification		Reason for Modification
			CS16 - Managing Transport and Travel	S19: Transport	
AM19	165	Appendix 3: Development Plan Policies to be superseded by the Local Plan (2022-2024) Plan Epsom Policies	Plan E Policy – An Area Action Plan for Epsom Town Centre Policies Policy E1 - Town centre boundary Policy E2 - Housing capacity in the Town Centre Policy E3 - Town Centre retail capacity Policy E4 - Town Centre Primary Shopping Area and Primary & Secondary Retail Frontages Policy E5 - Town Centre employment floorspace provision Policy E6 - Leisure, cultural and community facilities provision Policy E7 - Town Centre building height	Replacement Policy in Epsom and Ewell Local Plan (2022-2040) S10: Retail Hierarchy and Network S11: Design and Heritage S1: Spatial Strategy DM4: Primary Shopping Areas and Retail Frontages S9: Economic Development DM20: <u>Social Infrastructure and Community and Cultural Facilities</u> S11: Design and Heritage	To include most up to date policy references and titles

Ref	Page(s)	Policy number/paragraph number	Proposed Modification		Reason for Modification
			Policy E8 - Town Centre energy generation	N/A	
			Policy E9 - Public realm	S4: Epsom Town Centre	
			Policy E10 - Improving accessibility and facilities for cyclists	S19: Transport	
			Policy E11 - Deliveries to premises	S19: Transport	
			Policy E12 - Town centre parking	Appendix 4: Vehicle Parking Standards	
			Policy E13 - Changes to the road network	S17: Infrastructure Delivery	
			Policy E14 - Depot Road and Upper High Street	SA9: Depot Road and Upper High Street Car Park; <u>SA41: Conservative Club, Epsom Club and Church; and SA45: Auction House, Depot Road</u>	
			Policy E15 - The Utilities Site	SA1: Southern Gas Network Sites	
			Policy E16 - Epsom Station site	N/A	
			Policy E17 – Other Opportunity sites	See other Site Allocations	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification		Reason for Modification
				SA42: TK Maxx and SA43 Land R/O The Albion Public House (Mccaffertys Bar)	
AM20	166	Appendix 3: Development Plan Policies to be superseded by the Local Plan (2022-2024) Development Management Policies	Development Management Policies (2015)	Replacement Policy in Epsom and Ewell Local Plan (2022-2040)	To include most up to date policy references and titles
			DM1: Extent of the Green Belt	DM15: Green Belt	
			DM2: Infilling within the Major Developed Site	DM15: Green Belt	
			DM3: Replacement and extensions of buildings in the Green Belt	DM15: Green Belt	
			DM4: Biodiversity and New development	S14: Biodiversity and Geodiversity / S15 ; <u>DM25</u> Biodiversity Net Gain	
			DM5: Trees and Landscape	DM17: Trees, Woodlands and Hedgerows	
			DM6: Open Space Provision	DM19 Open Spaces, Outdoor Sport and Recreation	
			DM7: Footpath, Cycle and Bridleway Network	S19: Transport	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification		Reason for Modification
			DM8: Heritage Assets	DM13: Development Impacting Heritage Assets	
			DM9: Townscape Character and Local Distinctiveness	S13: Preserving identity of place with heritage S11: Design and Heritage	
			DM10: Design Requirements for New Developments (including House Extensions)	DM24 S12: Amenity Protection	
			DM11: Housing Density	S11: Design and Heritage	
			DM12: Housing Standards	DM1: Residential Space Standards	
			DM13: Building Heights	S11: Design and Heritage	
			DM14: Shopfront Design	DM14: Shopfronts	
			DM15: Advertisements and Hoardings	DM14: Shopfronts	
			DM16: Backland Development	N/A	
			DM17: Contaminated Land	DM18: Pollution and Contamination	
			DM18: Communications Infrastructure	DM23: Digital Infrastructure and Communications	
			DM19: Development & Flood Risk	S16: Flood Risk and Sustainable Drainage	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification		Reason for Modification
			Policy DM20 was deleted as part of the main modifications to the Plan	N/A	
			DM21: Meeting Local Housing Needs	S7: Specialist Housing	
			DM22: Housing Mix	S5: Housing Mix and Type	
			DM23: Gypsy and Traveller Sites	S6: Gypsies, Travellers and Travelling Showpeople	
			DM24: Employment Uses Outside of Existing Employment Policy Areas	DM5: Edge of Centre or Out of Centre Proposals	
			DM25: Development of Employment Premises	DM7: Employment Land	
			DM26: Equestrian-Related Development in the Green Belt	DM8: <u>Epsom Downs Racecourse and the Racehorse Training Zone</u> Industry	
			DM27: Working from Home	N/A	
			DM28: <u>Existing Retail Centres (Outside of Epsom Town Centre)</u>	Policy DM4: Primary Shopping Areas and Retail Frontages	
			DM29: <u>Major New Retail Developments</u>	DM7: Employment Land	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification		Reason for Modification
			<u>DM30: Existing Out of Centre Retail Facilities</u>	DM7: Employment Land	
			<u>DM31: Safeguarding Small-Scale Retail Provision</u>	DM6: Neighbourhood Parades and Isolated Shops	
			DM32: Parking and Servicing at Existing Retail Centres	S19: Transport	
			M33: Visitor Accommodation	DM9: Visitor Accommodation	
			DM34: New Social Infrastructure	DM20: <u>Social Infrastructure and Community and Cultural Facilities</u>	
			DM35: Transport and New Development	S19: Transport	
			DM36: Sustainable Transport for New Development	S19: Transport	
			DM37: Parking Standards	Appendix 4: Vehicle Parking Standards	
			DM38: Rear Servicing	S19: Transport	
AM21	173	Appendix 4: Vehicle Parking Standards,	Minimum Parking Requirement		Typographical error

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
		Table A4.4 -Table Heading		
AM22	175	Appendix 4: Vehicle Parking Standards, A4.2.4	<p>A4.2.4 Other forms of development parking</p> <p>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).</p>	Typographical error
AM23	185	Appendix 6: Guidance for Proposals Impacting Heritage Assets. A6.2.2	<p>A6.2.2 Conservation Areas</p> <p>The Council has used powers under Section 69, Part II of the Planning (Listed Buildings and Conservation Areas) Act 1990 to designate 21 Conservation areas. Each Conservation Area has been appraised for its features of significance and provides clarity about what in those areas should be preserved and enhanced. As such, any application for development will be expected to demonstrate how it will be sympathetic to features which have been identified as contributing to a property’s historic significance, in the context of the Local Plan Policies, National Planning Policy and Guidance and other relevant Historic England guidance. These features include, but are not limited to:</p> <ul style="list-style-type: none"> • The relevant architectural style of the area, such as Surrey Vernacular/Revival Vernacular styling. 	To provide further detail on where additional information can be located.

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			<ul style="list-style-type: none"> • Historic street patterns and space around buildings such as green space and gardens. • Boundary treatments. • Laid to lawn front gardens and natural planting, particularly shrubs and hedges. • Historic external walling such as brick, timber framing, pebbledash, tile hanging, and weatherboarding. • Historic roof coverings such as Welsh slate, clay tiles, and pantiles. • Chimney stacks and clay pots. • External doors and porches.¹ • Timber framed sash windows, metal framed windows with leaded lights and others. • Historic street furniture, such as streetlights, pillar boxes and phone boxes. • Historic paving including York stone and cobbles. • Views into and from Conservation Areas. <p><u>Further information on the Councils conservation areas, including the Conservation Area appraisals can be accessed from the following link:</u></p> <ul style="list-style-type: none"> • https://www.epsom-ewell.gov.uk/conservation-areas 	
AM24	186	Appendix 6: Guidance for Proposals	A6.2.4 Listed Buildings	To provide further detail on where additional information can be located.

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
		Impacting Heritage Assets. A6.2.4	<p>The Borough contains over 400 Listed Buildings, which are registered with Historic England. The official list descriptions by Historic England comprise basic details and should not be relied on as a definitive description of what about each building (including within its curtilage) is worthy of protection. Often, the submission of an application will allow deeper analysis, revealing other features of importance. Features that are commonly identified of being worthy of protection, include:</p> <ul style="list-style-type: none"> • All features that contribute to a Conservation Areas (described above), if located in or adjacent to one. • Period features. • Plan form, room shapes, walling and partitioning. • Internal doors and architraves. • Fireplaces and chimney pieces. • Joinery, such balustrading, stairs, skirtings and cupboards. • Carpentry, such as structural woodwork, joists and floorboards. • Plaster work, such as cornices and ceiling roses. • Any other feature of historic significance. <p><u>Further information on the Nationally Listed buildings can be accessed on the Historic England searchable list which can be accessed from the following link:</u></p> <ul style="list-style-type: none"> • https://historicengland.org.uk/listing/the-list/ 	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
AM25	186	Appendix 6: Guidance for Proposals Impacting Heritage Assets. A6.2.5	<p>A 6.2.5 Locally Listed Buildings</p> <p>Listed Building Consent applications are not required for alterations to Locally Listed Buildings (i.e. buildings that are not registered as listed by Historic England). However, where planning permission is required for development affecting them, applications will normally warrant deeper scrutiny of the impact on their historic and/or architectural significance.</p> <p><u>Further information on the locally listed heritage assets in the borough can be accessed from the following link:</u> https://www.epsom-ewell.gov.uk/residents/planning/historic-environment/locally-listed-heritage-assets.</p>	To provide further detail on where additional information can be located.
AM26	186	Appendix 6: Guidance for Proposals Impacting Heritage Assets. A6.3	<p>A6.3 Preferred approach to development proposals impacting heritage assets</p> <p>In addition to policy S13 and DM13 of the Local Plan, national planning policy and guidance from Historic England and Surrey County Council sets out the Council's approach to decision making for development impacting heritage assets. However, the merits of each development proposal against this policy and guidance will normally require</p>	To provide further detail on where additional information can be located.

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			<p>more detailed assessment than for other proposals. To aid these assessments, additional information such as a Heritage Statement, will be required (as stipulated by the Local Validation Checklist). Applicants are strongly advised to use the opportunity offered by the planning application and Listed Building Consent process, to demonstrate how proposals have attempted to preserve or enhance heritage assets, and work with Council staff to reduce and remove harm where it occurs. In order to aid this process, early and proactive engagement through the Council's pre application service is strongly recommended.</p> <p><u>Applicants should consult the Historic Environment Record held by Surrey County Council for applications impacting heritage assets.</u></p>	

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