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EPSOM & EWELL BOROUGH COUNCIL

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16 October 2026

SIR OR MADAM

I hereby summon you to attend an Extraordinary meeting of the Council of the Borough of Epsom and Ewell which will be held at the Council Chamber, Epsom Town Hall, Epsom on **MONDAY, 26TH OCTOBER, 2026** at **7.30 pm**. The business to be transacted at the Meeting is set out on the Agenda overleaf. A link to the meeting is provided above.

Prayers will be said by the Mayor's Chaplain prior to the start of the meeting.

Chief Executive

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 on the internet.

A link to the online address for this meeting is provided on the first page of this agenda and on the Council's website. A limited number of seats will also be available in the public gallery at the Town Hall. For further information please contact Democratic Services, email: democraticservices@epsom-ewell.gov.uk, 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 Mayor agree to discuss any other such matters on the grounds of urgency, the Council will 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

Questions and statements from the public are not permitted at meetings of the Council. Annex 4.2 of the Epsom & Ewell Borough Council Operating Framework sets out which Committees are able to receive public questions and statements, and the procedure for doing so.

Filming and recording of meetings:

The Council allows filming, recording and photography at its public meetings. By entering the Council Chamber and using the public gallery, you are consenting to being filmed and to the possible use of those images and sound recordings.

Members of the Press who wish to film, record or photograph a public meeting should contact the Council's Communications team prior to the meeting by email at: communications@epsom-ewell.gov.uk

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.

COUNCIL

Monday 26 October 2026

7.30 pm

Council Chamber - Epsom Town Hall,
https://www.youtube.com/@epsomandewellBC/playlists

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

AGENDA

1. 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.

2. POLLING DISTRICT AND POLLING PLACES REVIEW (Pages 5 - 70)

This report sets out recommendations for proposed changes to Polling Districts.

3. REFORM OF PLANNING COMMITTEES AND NATIONAL SCHEME OF DELEGATION (Pages 71 - 106)

Changes to the Town and Country Planning Act 1990 and the publication of Regulations made under that Act require changes to the Council's Constitution to reflect a new National Scheme of Delegation for planning applications, with a deadline of 31 October 2026 for all Councils in England to amend their Constitution to bring them in line with the new regulations.

4. EPSOM AND EWELL LOCAL PLAN (2022-2040) PROPOSED MAIN MODIFICATIONS CONSULTATION (Pages 107 - 620)

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 Licencing and Planning Policy Committee on the 22 September 2026 agreed to 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.

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POLLING DISTRICT AND POLLING PLACES REVIEW

Head of Service:	Piero Ionta, Head of Legal and Monitoring Officer
Report Author:	Tim Richardson
Wards affected:	(All Wards);
Appendices (attached):	**Appendix 1**: Review of Polling Districts, Polling Places & Polling Stations: Consultation – November 2024

Summary

This report sets out recommendations for proposed changes to Polling Districts.

Recommendation (s)

The Council is asked to:

(1) Agree the location of the polling places and districts as set out in Appendix A within Appendix 1.

1 Reason for Recommendation

1.1 This report presents a recommendation from the Strategy and Resources Committee for amendments to polling districts.

2 Recommendation from Strategy & Resources Committee

2.1 At its meeting of 12 November 2024 the Strategy & Resources Committee approved a Polling District and Polling Place Review to be opened for public consultation between 21 November 2024 and 02 January 2025.The purpose of this review was to facilitate the adoption of changes required as a result of an electoral review of Surrey County Council by the Local Government Boundary Commission (LGBCE).

2.2 The Committee considered the responses to the consultation at its meeting of 28 January 2025 and unanimously recommended the proposals put forward by the review to Full Council for adoption.

2.3 Subsequent to the committee's consideration of the proposals, officers were notified that due to the announcement of Local Government Reorganisation, any Surrey County Council by-elections held before 30 September 2026 would use the existing (old) County Council division boundaries. This was then confirmed within Schedule 1 of the Surrey (Structural Changes) Order 2026. These factors meant that the Register of Electors for the Borough could not be updated to include the changes to polling districts recommended by the Strategy and Resources in advance of 30 September 2026, but that they would still be required after that date.

2.4 Accordingly, the recommendations of Strategy and Resources Committee were not proposed to Full Council in February 2025 and the Chair of the committee recommended to the Council that this item be considered at an appropriate time in the future.

2.5 As the deadline of 30 September 2026 has now passed, the proposed changes can be incorporated into the Register of Electors if approved by Full Council.

2.6 If approved, the recommended changes will be implemented from the next publication of the Register of Electors for the Borough, on 1 December 2026.

3 Background – Polling district and polling place reviews

3.1 The Representation of the People Act 1983 (the Act) was amended by the Electoral Administration Act 2006 (Section 16) and later by the Electoral Registration Act 2013 (Section 17) to detail the current process regarding the way reviews of polling districts and polling places must be undertaken.

3.2 The Council is responsible for undertaking each review to provide a sufficient number of polling districts and polling places for elections.

3.3 The Council's Chief Executive, as Returning Officer for Epsom & Ewell Borough Council, is and remains responsible for undertaking the review prior to 1 April 2027. The Returning Officer is also responsible for deciding how many polling stations are required for each polling place and for allocating electors to those polling stations as they consider appropriate.

3.4 At least one polling place must be identified for each polling district. Polling places have polling stations located within them; so, for example, a church building may be a polling place, with the room or hall where voting takes place comprising the actual polling station.

3.5 There are a number of factors that need to be considered when reviewing existing polling places or when assessing new polling places. In practice, the designation of polling places is very much dependent on the availability of suitable premises that can be used as polling places.

3.6 The Council cannot propose changes to Ward, Borough or Constituency boundaries, which are the responsibility of the Local Government Boundary Commission for England (LGBCE) or Boundary Commission for England (BCE).

3.7 If the recommendations of the Strategy and Resources Committee are agreed, the polling districts and polling places proposed will be confirmed with effect from the next publication of the Register of Electors on 1 December 2026, and will be used for any election called subsequent to 1 December 2026.

4 Background - Council Motion on use of Schools as Polling Places

4.1 At its meeting on 23 July 2019, Council passed the following Motion:

4.1.1 “This Council agrees that it will no longer use any schools that, in order to act as a polling station, would have to close for the day. It will provide polling districts which it has been accustomed to using such schools with alternative polling stations as near as possible to that polling district”.

4.2 It is important to note that the legislation (Representation of the People Act 1983, Schedule A1) sets out the requirements for polling place reviews. This requires Local Authorities to comply with the access requirements. As part of the review, they must:

4.2.1 Seek to ensure that all electors in a constituency in the local authority area have such reasonable facilities for voting as are practicable in the circumstances.

4.2.2 Seek to ensure that so far as is reasonable and practical every polling place for which it is responsible is accessible to electors who are disabled.

4.3 In the event these tests are not met, an elector has a right of representation (i.e. appeal). The two appeal grounds are:

4.3.1 The local authority has failed to meet the reasonable requirements of the electors in the constituency

4.3.2 The local authority has failed to take sufficient account of accessibility to disabled persons of the polling station/ polling stations within a polling place.

4.4 It is therefore clear, that a polling place is determined with the elector as the primary interest, no other considerations form part of the legislative requirements.

5 Consultation Exercise

5.1 The consultation in respect of the Polling Districts and Places Review was carried out for five weeks between 21 November 2024 and 2 January 2025, a copy of the consultation document is attached at Appendix 1. The review was conducted in accordance with the Electoral Commission's guidance on conducting such reviews.

5.2 To ensure a wide circulation of the consultation, it was made available on the Council's website, communicated via social media and a number of consultees were directly informed as detailed on page 5 of Appendix 1. All venues including the affected schools (i.e. those allocated as Polling Places) were contacted directly to advise of the review and to enable them to comment on the proposals.

5.3 During the consultation period, a number of representations were received. In essence, the representations were made up as follows:

Ward	**Total Number Received**
College	**1**
Not Ward Specific	**4**

5.4 Following consideration of the all the representations by officers, a set of proposals were presented to the Strategy & Resources Committee on the 28 January 2025. The Strategy and Resources Committee unanimously agreed to recommend the proposals to Council for approval.

6 Recommendations

6.1 The changes to polling districts recommended by Strategy and Resources Committee are as follows:

EEBC Ward:	**Recommendation for change to polling district:**
Court Ward	**That polling district FB(2) is merged with polling district FA which is in the same East Surrey Council electoral ward as proposed by the review documentation.** **That polling district FB(1) is renamed FB as proposed by the review documentation.**
Horton Ward	**That the polling districts N(1) and N(2) be merged and known as N, as proposed by the review documentation.**

6.2 There are no further changes to polling districts proposed by the review.

6.3 There are no changes to polling places proposed. However, voters in the current polling district FB (2) (which will be merged into polling district FA) will vote at the Bowling Pavilion, Court Recreation Ground, Pound Lane, Epsom KT19 8SB. This is the same polling place which is used by all voters in polling district FA, and was successfully used during the May 2026 elections.

7 Risk Assessment

Legal or other duties

7.1 Equality Impact Assessment

7.1.1 The Council has due regard to its equality duties under Section 149 of the Equalities Act 2010. In addition, it is a legal requirement of the Returning Officer that, in so far as is reasonable and practical, every polling place is accessible to electors with disabilities. This has been taken fully into account during this review process.

7.1.2 Appropriate equipment (such as ramps, visual enhancement aids etc.) will continue to be provided at all polling stations, and all polling staff will continue to be fully trained to provide support and facilities for voters with disabilities.

7.2 Crime & Disorder

7.2.1 None.

7.3 Safeguarding

7.3.1 Safeguarding issues are considered for all potential polling places prior to their recommendation to the Council, and prior to every election. Any issues identified are appropriately managed in accordance with Council policies and in agreement with the management of the premises.

7.4 Dependencies

7.4.1 None.

7.5 Other

7.5.1 None.

8 Financial Implications

8.1 The cost of venue hire for national elections and referenda is met by central Government. Costs for local elections are covered by the relevant council’s own allocated budgets.

8.2 **Section 151 Officer's comments**: The financial implications are included in this report.

9 Legal Implications

9.1 The review of polling districts and polling places was undertaken in accordance with Section 18 of Representation of the People Act 1983 (as amended by Section 17 of the Electoral Registration Act 2013), which requires such a review to be undertaken every five years. A review requires all of the steps set out in Schedule A1 of Representation of the People Act 1983 to be met, as demonstrated by this report and its appendices.

9.2 In addition, due consideration has been given to the requirements of the Electoral and Registration Act 2013 in relation to the timing of the review.

9.3 The regulations that govern the use of schools falls under rule 22, Schedule 1 of the Representation of the People Act 1983. There is a duty imposed on schools who are either maintained or assisted in any way by money provided by Parliament, to be used free of charge (with the exception of certain expenses) as polling places.

9.4 Section 83 (3) of the Local Government Act 1972 sets out that if a casual vacancy occurs in the six months before the date on which a councillor would have ordinarily retired, an election is not to be held, unless more than one third of the authority's seats are vacant.

9.5 **Legal Officer's comments**: None arising further to the content of this report.

10 Policies, Plans & Partnerships

10.1 **Council's Key Priorities**: The following Key Priorities are engaged:

- Effective Council

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

10.3 **Climate & Environmental Impact of recommendations:** The accessibility of polling places by foot, bicycle and public transport has been considered in the process of their recommendation to the Council.

10.4 **Sustainability Policy & Community Safety Implications**: None.

10.5 **Partnerships**: None.

10.6 **Local Government Reorganisation Implications**: The proposals put forward by this report aim to enable the successful delivery of future elections held in the Borough. From 1 April 2026, all elections held in the Borough these will be delivered by East Surrey Council.

10.7 These proposals enable the polling districts for Epsom and Ewell to be updated to meet the warding arrangements of East Surrey Council and will remain in place until a further review of polling districts and polling places is undertaken by East Surrey Council.

11 Background papers

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

Previous reports:

- Minutes of Full Council, 11 February 2025
- Report to Strategy and Resources Committee, 28 January 2025, Polling District and Places Review
- Report to Council 23 July 2019, Notices of Motions, Polling Stations

Other papers:

- Public Consultation - Polling District and Polling Places Review, November 2024
- Electoral Commission: Reviews of Polling Districts, Polling Places And Polling Stations: https://www.electoralcommission.org.uk/reviews-polling-districts-polling-places-and-polling-stations
- Local Government Boundary Commission Electoral Review of Surrey County Council

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Public Consultation

Polling District and Polling Places Review

Epsom & Ewell Borough Council

November 2024

Jacqueline King - Acting Returning Officer
Epsom & Ewell Borough Council
The Town Hall
The Parade
Epsom
Surrey KT15 8BY

www.epsom-ewell.gov.uk

Background

The Representation of the People Act 1983 (the Act) was amended by the Electoral Administration Act 2006 (Section 16) and later by the Electoral Registration Act 2013 (section 17) to detail the current process regarding the way reviews of polling districts and polling places must be undertaken.

First Review

The Act specified how frequently reviews should be undertaken and made it a requirement that relevant authorities (i.e. this Council) carry out a review every four years. The Council was required to conclude the first review by 31 December 2007. The review was duly undertaken in September 2007 and the outcome of the review reported to Council in December of that year.

Subsequent Reviews

Notwithstanding the legislation, the Council regularly reviews its polling places but duly completed a second statutory review in December 2011.

The Electoral Registration Act 2013 introduced a change to the timing of compulsory reviews and these were subsequently held in December 2014, December 2019, December 2022 and October 2023.

Definition of a Parliamentary Constituency, a Ward, Polling District, Polling Place and Polling Station

To assist any interested party who may wish to make representations, the following definitions may be helpful:

a) Parliamentary Constituency

This is an area designated by the Boundary Commission which is represented by a Member of Parliament (MP) in the House of Commons. This cannot be changed by the review – it is the division of the constituency into polling districts and places that is under review.

b) Wards

The Borough is divided into areas known as “Wards” which are represented by Borough Councillors.

c) Polling Districts

A polling district is the area created by the division of a Ward into smaller parts, within which a polling place can be determined which is most suitable for the electors.

d) Polling Places

A polling place is the building or area in which the number of polling stations will be selected by the Acting Returning Officer.

e) Polling Station

A polling station is the room or area in which voting takes place. This must be located within the polling place that has been designated for the particular polling district. The number of polling stations to be accommodated within a polling place is the decision of the Acting Returning Officer.

Timetable for the Review

The Council is required to publish notice of the holding of a review. This has been carried out by way of notices posted outside the Town Hall, Epsom and on the Council's website. The timetable for the review is set out below:

Publication of notice	21 November 2024
Publication of consultation document	21 November 2024
Closing date for representations	5pm,2 January 2025
Consideration of all representations	3-10 January 2025
Report to Strategy and Resources Committee	28 January 2025
Report to Full Council	11 February 2025
Publication of notice of amendments to electoral register and intention to publish revised version of register (If necessary)	14 February 2025
Publication of revised version of register (if necessary)	1 March 2025

Criteria for Polling Places and Polling Districts

The Electoral Commission has set out guidance to assist in assessing the current arrangements and any proposals for change.

As part of the assessment of the suitability of polling district boundaries, the following should be considered:

- Are the boundaries well defined? For example. Do they follow the natural boundaries of the areas? If not, is it clear which properties belong in the polling district?

- Are there suitable transport links within the polling district, and how do they relate to the areas of the district that are most highly populated? Are there any obstacles to voters crossing the current polling district and reaching the polling place e.g., steep hills, impassable major roads, railway lines, rivers?

There are also a number of factors that must be considered when reviewing existing polling places or assessing new polling places, including:

- The location: is it reasonably accessible within the polling district? Does it avoid barriers for the voter such as steep hills, major roads, rivers, etc.? Are there any convenient transport links?

- Size: can the polling place accommodate more than one polling station if required? If multiple polling stations are required, is the polling place ample enough to accommodate all voters going into and out of the polling stations, even where there is a high turnout?

- Suitability: is the building readily available in the event of any unscheduled elections? Is there any possibility that the building may be demolished as part of a new development? Is the building accessible to all those entitled to attend the polling place?

The Electoral Commission recognises that the choice of polling place will often be a balance between the quality of the building in terms of access and facilities and the proximity of the building to the electors it is intended to serve and that there may be circumstances, where the polling place might fall wholly or partly outside the polling district because suitable alternatives are not available in the relevant Ward.

Although it is Council policy to avoid the use of schools wherever possible, there may be locations where there are no other suitable premises in the area. If a school is used, the polling station(s) should be located within the school grounds to enable the school to remain open with suitable separation of pupils from voters to cause minimal disruption to the school day. Any decision to close any school ultimately remains with the school itself.

There are occasions where a school may be the only option available, and it may need to close.

For the purposes of elections, the Acting Returning Officer is entitled to use free of charge, subject to covering the cost of heating, lighting and caretaking charges, schools maintained or assisted by a local authority as well as those schools that receive grants made up of monies provided by Parliament.

In conducting this review, it is proposed that, in order to minimise the risk of queues at a polling place, as far as possible, that no more than 2250 voters should be assigned to each polling station as recommended by the Electoral Commission.

It should be noted that the number of postal voters in each polling district is a relevant consideration in this regard. In the event of a combined and/or Parliamentary Election, given more complex arrangements and higher voter turnout, it may be necessary to review these numbers. In all circumstances, consideration is given to whether a polling place is capable of accommodating more than one polling station, if necessary.

Current practice, to avoid confusion and delays at polling stations and the Count, is not to locate polling stations from more than one Ward or County division in the same building and this will be taken into consideration when considering any proposals.

Polling station staff are encouraged to make comments and observations regarding the suitability of polling places to which they are allocated, as are Polling Station Inspectors who visited all polling stations during the last elections (held in May & July 2024). Comments made have been taken into account when conducting this review.

The Role of the Acting Returning Officer

Whilst it is for the Council to decide on the creation of polling districts and location of polling places, it is for the Acting Returning Officer to decide how many polling stations are required for each polling place and must allocate electors to the polling stations in such manner as they think most conducive to the smooth running of polling day.

The Council is required to consult the Returning Officer for every Parliamentary Constituency that is wholly or partly within its area. The whole of the Borough falls within the Parliamentary Constituency of Epsom and Ewell there are no other Constituencies wholly or partly within its area.

Therefore, the Council needs only to consult the Acting Returning Officer for Epsom and Ewell as part of the review and the Acting Returning Officer must comment during any review on both the existing polling districts and the polling stations and any proposed changes.

Other representations

Any elector in the Constituency may make representations on the designation of polling districts or places.

The Council is also required to seek representations from those with an expertise in relation to access to premises and facilities for disabled people. Such persons must also be given the opportunity to comment on the representations made by the Acting Returning Officer (which are contained in this consultation document).

Summary of Consultees

Set out below is a list of persons specifically notified about the review:

- The Member of Parliament for Epsom and Ewell, Helen Maguire
- Surrey Coalition of Disabled People (www.surreycoalition.org.uk)
- All Epsom and Ewell Borough Councillors
- All Surrey County Councillors representing divisions within the Epsom area
- Election agents who acted at the 2024 PCC & Parliamentary elections
- Registered political parties who regularly field candidates in local and parliamentary elections in the Borough
- Venues used as polling places

Completion of the review

After considering all of the representations, a report will be presented to the Strategy and Resources Committee. It is anticipated that this will be at its meeting on 28 January 2025. The Strategy and Resources Committee will consider the report and make recommendations as it thinks appropriate to Full Council on 11 February 2025 at which the final decisions will be made.

The Council is required to give reasons for its decisions in respect of the designation of both polling districts and polling places and these will be published, together with the following information, on the Council's website and made available, on request, at the Town Hall, Epsom:

- all correspondence sent to the Acting Returning Officer in connection with the review
- all correspondence sent to any person who the Council thinks has particular expertise in relation to access to premises or facilities for persons who have different forms of disability
- all representations made by any person in connection with the review
- the minutes of any meetings held by the Council where details of the review have been considered
- details of the actual designations of polling districts and polling places agreed as a result of the review

Challenging the Review

Although the Electoral Commission has no initial role in the review process itself, it does have an important role in respect of considering representations and observations made that a Council has failed to conduct a proper review on one of two grounds:

- that the Council has failed to meet the reasonable requirements of the electors in the constituency, or a body of them (i.e., the reasonable requirements of a particular area of the authority have not been satisfactorily met)

or

- that the Council has failed to take sufficient account of the accessibility to disabled persons of polling stations within a designated polling place.

Representations based on any other grounds will not be considered by the Commission.

All representations made to the Commission must be in writing either by post, or email and should include the location and any other relevant information, stating specifically why it is inaccessible or does not meet the reasonable requirements of the electors.

Who may make a representation to the Electoral Commission?

Section 18D (1) of the Representation of the People Act 1983, sets out who may make representations to the Electoral Commission namely;

- not less than thirty registered electors in the constituency (although electors registered anonymously cannot make a representation)
- a person (except the Acting Returning Officer) who made representations to the council when the review was being undertaken
- any person who is not an elector within the constituency but who the Electoral Commission feels has sufficient interest in the accessibility of disabled persons in the areas or has particular expertise in relation to the access to premises or facilities of disabled persons

The Acting Returning Officer is entitled to make observations on any representations made to the Commission.

What will the Electoral Commission do?

The Electoral Commission is required to consider any representations and observations and may direct the relevant council to make any alterations it sees necessary to the polling places designated by the review. Should a Council fail to make the alterations within two months of the direction being given, the Commission may make the alterations itself.

Proposals

Set out in Appendix A are details of current and proposed polling districts and polling places for each of the Wards within the Borough of Epsom and Ewell.

Appendix B contains a map and a breakdown for each polling place with the details of any proposed changes and the comments of the Acting Returning Officer.

The electorate, broken down into polling districts, is based on the electorate as at 1 November 2024.

Any significant comments from polling station staff or polling station inspectors regarding the condition or accessibility of currently used polling places are included where appropriate.

A full review of polling districts & places was last conducted in 2023 and this review is available on the Council's website (https://www.epsom-ewell.gov.uk/council/elections-and-voting/electoral-boundaries).

There are no known plans which would affect the availability of those Council-owned premises currently used as polling places. The Council has had no indication that private venues currently used will not be available in future, apart from as indicated in Appendix B.

Representations

Any persons wishing to make comments or representations regarding the proposals may do so. Any representations you wish to make should be **received by no later than 5pm on 2 January 2025**

All representations must be made in writing either by email or post.

Representations by email with the subject line Polling District/Place Review, should be sent to:

electoralservices@epsom-ewell.gov.uk

Representations by post should be sent to:

Electoral Services (Polling District/Place Review)
Epsom and Ewell Borough Council
The Town Hall
The Parade
Epsom
Surrey
KT18 5BY

For any queries, please telephone 01372 732000 and ask to speak to Electoral Services.

All representations will be published on the Council's website after the closing date for representations.

The final decision will be taken by full Council at its meeting on 11 February 2025 and, if necessary, a notice of any alterations to the register will be published on the Council's website no later than 14 February 2025.

Any new polling districts and polling places will become effective at all elections held after 1 March 2025.

Appendix A

Epsom & Ewell Borough Council
Schedule of Current and Proposed Polling Districts and Polling Stations

WARD	CURRENT POLLING DISTRICT	CURRENT POLLING PLACE	PROPOSED POLLING PLACE
CUDDINGTON	AA	Rowe Hall, 2nd Cuddington Scout HQ, Salisbury Road, Worcester Park KT4 7LP	No Change
	AB	St Mary's Church Hall, The Avenue, Worcester Park	No Change
AURIOL	B	Stoneleigh Methodist Church Centre, Stoneleigh Crescent, Ewell KT19 0RT	No Change
EWELL COURT	CA	Ruxley Church, Ruxley Lane, West Ewell KT19 0JG	No Change
	CB	Ewell Court House, Ewell Court Avenue, EwellKT19 0EB	No Change
RUXLEY	D	Epsom & Ewell High School, Ruxley Lane, West Ewell KT19 9JW	No Change
WEST EWELL	EA	Epsom Vineyard Church Centre, 23 Lansdowne Road, West Ewell KT19 9QJ	No Change
	EB	All Saints Church & Community Centre, Fulford Road, West Ewell KT19 9QY	No Change

WARD	CURRENT POLLING DISTRICT	CURRENT POLLING PLACE	PROPOSED POLLING PLACE
COURT	FA	Bowling Pavilion, Court Recreation Ground, Pound Lane, Epsom KT19 8SB	No Change
	FB(1) & FB(2)	Community & Wellbeing Centre, Sefton Road, Epsom KT19 9HG	FB (1) – No Change FB (2) - Bowling Pavilion, Court Recreation Ground, Pound Lane, Epsom KT19 8SB (proposed to merge with FA)
STAMFORD	GA	The Church Hall, Christ Church, Christ Church Road, Epsom KT19 8NE	No Change
	GB	The Wells Community Centre, Spa Drive, Epsom KT18 7LR	No Change
STONELEIGH	H	Stoneleigh Baptist Church Hall, The Glade, Stoneleigh KT17 2HL	No Change
NONSUCH	IA	St Paul's Church Centre, Northey Avenue, Cheam SM2 7HS	No Change
	IB	NESCOT, Reigate Road, Ewell KT17 3DS	No Change
EWELL VILLAGE	J	Bourne Hall, Spring Street, Ewell KT17 1UF	No Change

WARD	CURRENT POLLING DISTRICT	CURRENT POLLING PLACE	PROPOSED POLLING PLACE
TOWN	KA	Defoe Court, 87 East Street, Epsom KT17 1AQ	No Change
	KB	Epsom Playhouse, Ashley Avenue, Epsom KT18 5AL	No Change
	KC	St. Barnabas Church, Temple Road, Epsom KT19 8TU	No Change
COLLEGE	LA	The Pavilion, Alexandra Recreation Ground, Alexandra Road, Epsom KT17 4BU	No Change
	LB	The Church House, Church Street, Epsom KT17 4PX	No Change
WOODCOTE AND LANGLEY VALE	MA	Grace Baptist Church, 32 Dorking Road, Epsom KT18 7NH	No Change
	MB	St Martin's C of E Junior School, Ashley Road, Epsom KT18 7AD	No Change
	MC	Langley Vale Village Hall, Rosebery Road, Epsom KT18 6AF	No Change
HORTON	N(1) & N(2)	The Horton Arts Centre, Haven Way, Epsom KT19 8NP	No Change other than merging N1 & N2 to become single ward/polling district

TOTALS

Number of Polling Places	**25**	**Number of Polling Stations**	**35***

*Note: Depending on the election some Polling Places have more than 1 polling station located at it.

Appendix B

Epsom & Ewell Borough Council

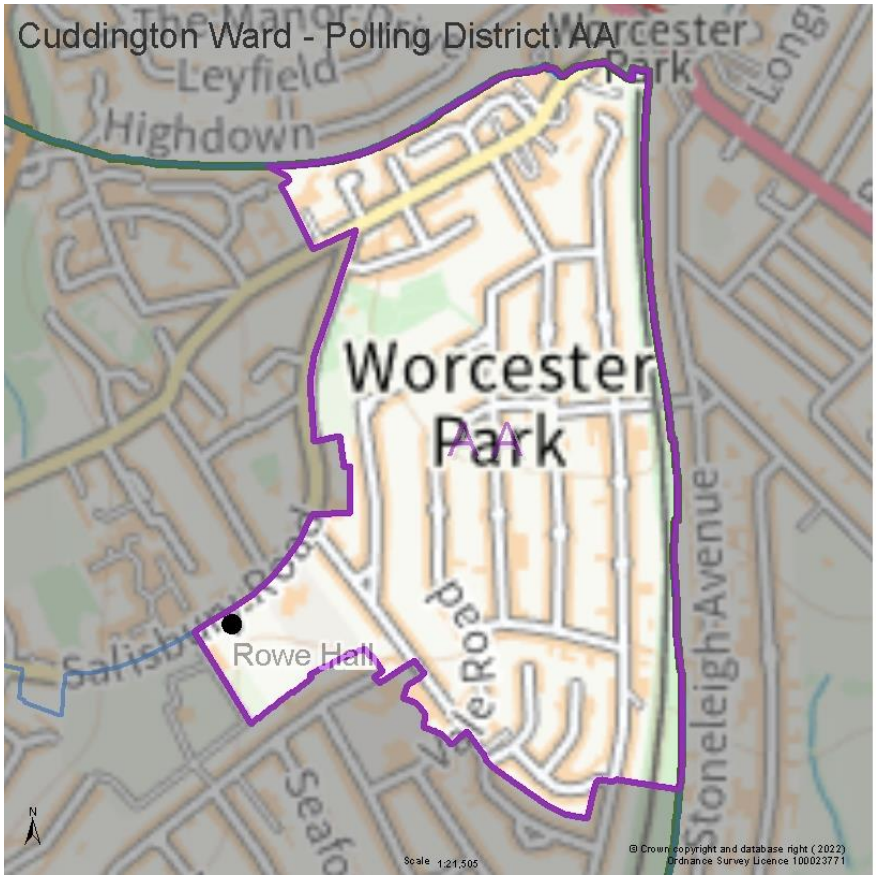
Existing Polling Districts & Places and Acting Returning Officers' representations

Cuddington Ward

Number of Polling Districts: Two
Number of Polling Places: Two
Electorate in Ward: **5001**
Postal Voters in Ward: **790**

Polling District	**A(A)**
Electorate in District:	**2738**
Postal Voters:	**381**
Polling Place	Scout Hut (Rowe Hall), Salisbury Road, Worcester Park KT4 7LP
No. of Stations	2
Map Ref.	**1**
Proposals	No change
Comments	Premises and location satisfactory Disabled access - good Parking – limited off-street parking available on site. On-street parking available around venue.

Polling District 2024



Cuddington Ward AA (cont)

Acting Returning Officer's Representations

No adverse feedback has been received post the May & July 2024 elections.

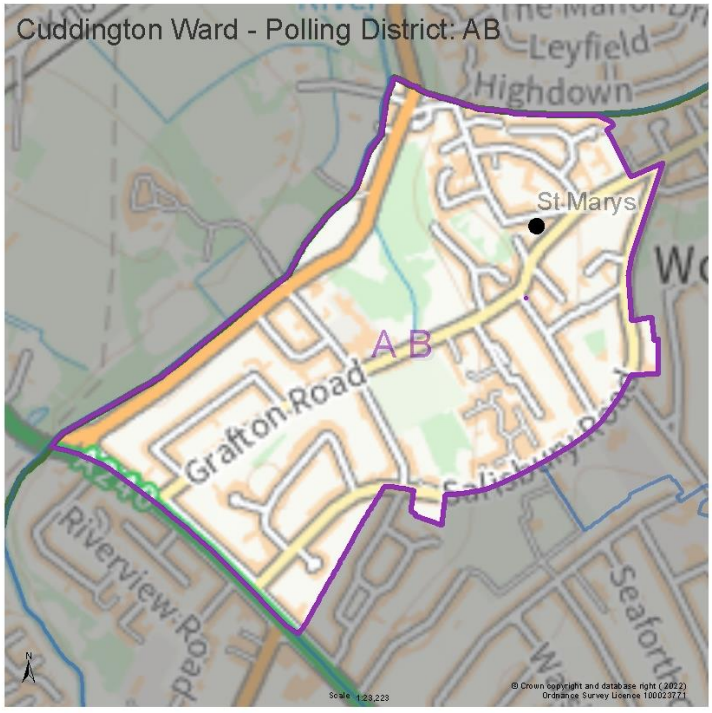
No changes are proposed to the polling district at this time.

I consider the polling district and polling place appropriate.

Cuddington Ward (cont)

Polling District	**A(B)**
Electorate in District	**2263**
Postal Voters	**409**
Polling Place	St Mary's Church Hall, The Avenue, Worcester Park KT4 7HL
No. of Stations	1
Map Ref.	**2**
Proposal	No change
Comments	Premises and location satisfactory Disabled access - good Parking - off-street parking available on site. On-street parking also available around venue. Venue is large enough to accommodate 2 polling Stations if necessary

Polling District 2024



Acting Returning Officer's Representations

No adverse feedback has been received following the May & July 2024 elections.

No changes are proposed to the polling district at this time.

I consider the proposed polling district and polling place to be appropriate.

Auriol Ward

Number of Polling Districts: One
Number of Polling Places: One
Electorate in Ward: **3430**
Postal Voters in Ward **542**

Polling District	**B**
Electorate in District	**3430**
Postal Voters	**542**
Polling Place	Stoneleigh Methodist Church Centre, Stoneleigh Crescent, Stoneleigh, Ewell KT19 0RT
No. of Stations	2
Map Ref.	**3**
Proposal	No change
Comments	Premises and location satisfactory Disabled access - good Parking – off-street parking available on site. On-street parking available around venue.

Polling District 2024

Acting Returning Officer's Representations

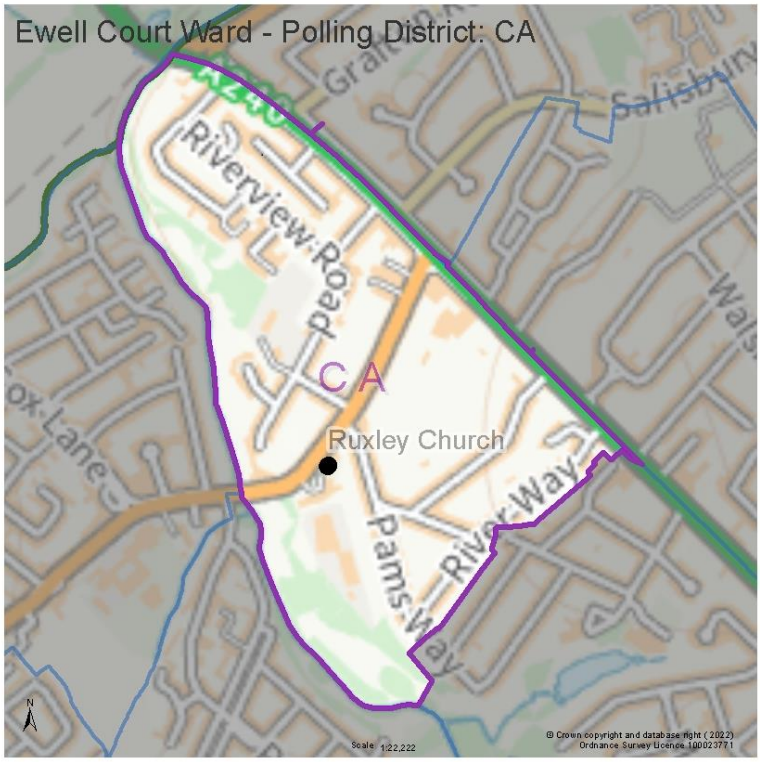
No adverse feedback has been received post the May & July 2024 elections.
No changes are proposed to the polling district at this time.
I consider the polling district and polling place to be appropriate.

Ewell Court Ward

Number of Polling Districts: Two
Number of Polling Places: Two
Electorate in Ward: **3614**
Postal Voters in Ward: **591**

Polling District	**C(A)**
Electorate in District	**1909**
Postal Voters	**324**
Polling Place	Ruxley Church, Ruxley Lane, West Ewell KT19 0JG
No. of Stations	1
Map Ref.	**4**
Proposal	No change
Comments	Premises and location - Good Disabled access - Good Parking – off-street parking available on site.

Polling District 2024



Acting Returning Officer's Representations

No adverse feedback has been received post the May & July 2024 elections.

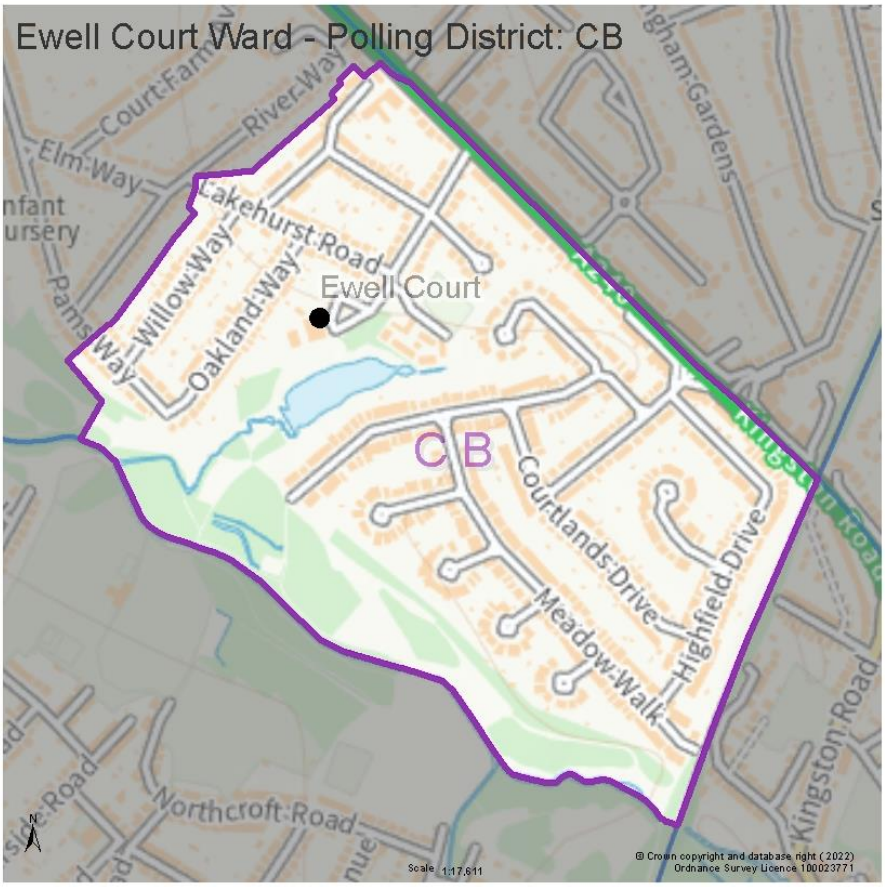
No changes are proposed to the polling district at this time.

I consider the polling district and polling place to be appropriate.

Ewell Court Ward (cont)

Polling District	**C(B)**
Electorate in District	**1705**
Postal Voters	**267**
Polling Place	Ewell Court House, Lakehurst Road, Ewell KT19 0EB
No. of Stations	1
Map Ref.	**5**
Proposal	No change
Comments	Council owned premises Premises and location satisfactory Disabled access – good via separate side door Parking - off-street parking available

Polling District 2024



Acting Returning Officer's Representations

No adverse feedback has been received post the May & July 2024 elections.

No changes are proposed to the polling district at this time.

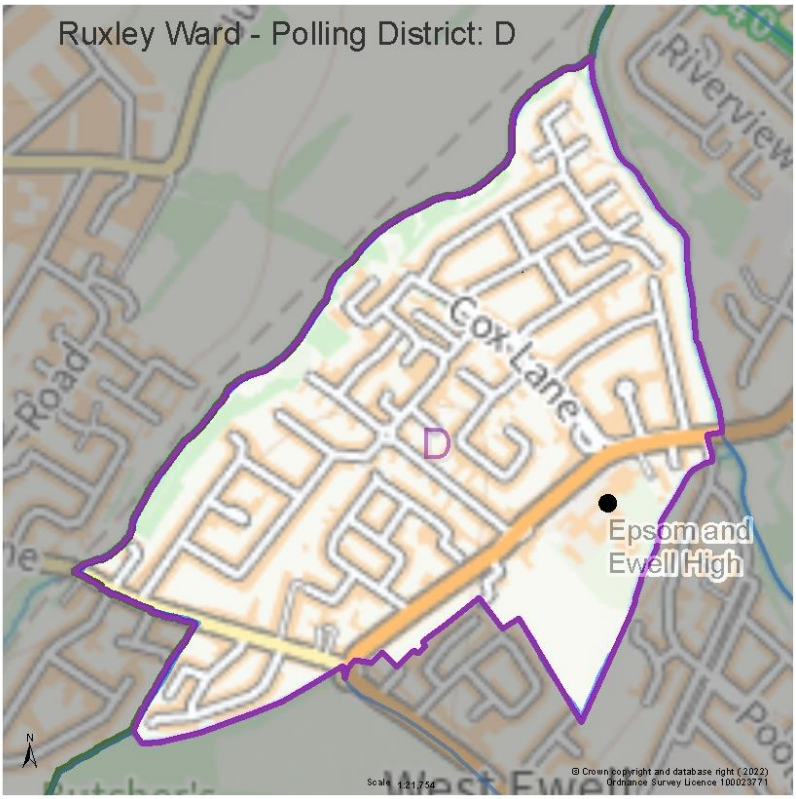
I consider the polling district and polling place to be appropriate.

Ruxley Ward

Number of Polling Districts: One
Number of Polling Places: One
Electorate in Ward: **3721**
Postal Voters in Ward **506**

Polling District	**D**
Electorate in District	**3721**
Postal Voters	**506**
Polling Place	Epsom & Ewell High School, Ruxley Lane, West Ewell KT19 9JW
No. of Stations	2
Map Ref.	**6**
Proposal	No change
Comments	Premises and location satisfactory Disabled access – good Parking – off-street parking available on-site for disabled only during school hours Polling station is located in the North Annexe which is separate from main school building and enables the school to remain open on polling day.

Polling District 2024



Ruxley Ward D (cont)

Acting Returning Officer's Representations

It is recognised that having a polling place in a school is not entirely satisfactory, but enquiries have failed to identify any other premises suitable for designation as a polling place elsewhere in the ward and there would be a significant cost implication in providing temporary unit accommodation even if a suitable location could be found.

For the Police & Crime Commissioner elections in May 2024 the school asked that the new pavilion be used instead of the usual location (North Annexe building) due to safeguarding reasons and wanting to keep voters off the school grounds and away from the children. This move was implemented on a strictly trial basis for the election however the location was deemed to be not suitable due to a number of reasons.

The lack of disabled parking for voters resulted in multiple complaints and some voters giving up due to the distance to walk from the parking area to the pavilion and not voting at all on the day. There were other issues with the location including complaints from voters about a lack of external lighting and antisocial behavior related to the use of electric scooters and bikes in the access footpath which leads to the site. This latter issue resulted in the police being called to attend the site towards the end of polling day as voters and staff were being subject to unacceptable intimidation.

For the Parliamentary election on 4 July 2024 the polling station reverted back to the normal location in the North Annexe and the school made a decision to close on polling day. The school is able to utilise an inset day for this purpose if it chooses to do so. The return to use of the North Annexe building in July 2024 resolved the issues experienced in May 2024 and no complaints were received from voters as a result of the arrangements.

If the school decides that it does not want to close on polling day for future elections then we can continue to implement the system for parking for voters with mobility issues during the school hours. This has been successfully implemented for several years and involves notifying voters via a warning message on their poll cards regarding the restricted access. There is on-street parking available on roads close to the school.

No changes are proposed to the polling district at this time.

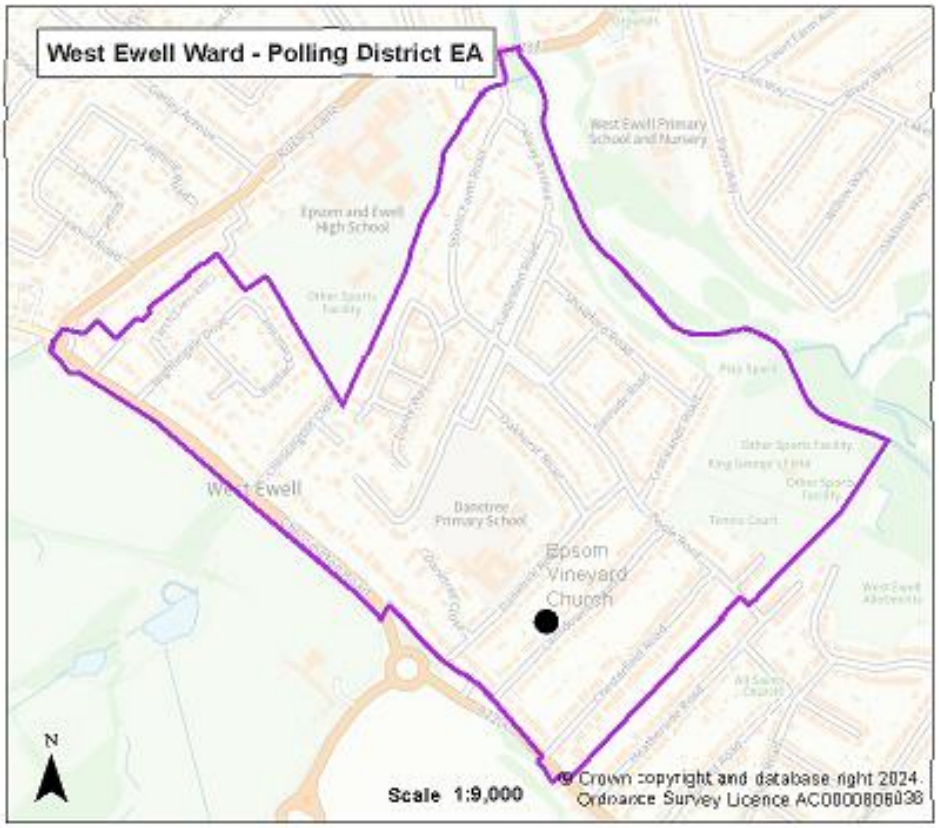
In the absence of any suitable alternatives, I consider the polling district and polling place appropriate.

West Ewell Ward

Number of Polling Districts	Two
Number of Polling Places	Two
Electorate in Ward	**5068**
Postal Voters in Ward	**660**

Polling District	**E(A)**
Electorate in District	**2099**
Postal Voters	**282**
Polling Place	Epsom Vineyard Church Centre, Lansdowne Road, West Ewell KT19 9QJ
No. of Stations	1
Map Ref.	**7**
Proposal	No change
Comments	Premises and location satisfactory Disabled access – satisfactory Parking – Limited off-street parking on site; on-street parking on residential road.

Polling District 2024



West Ewell Ward EA (cont)

Acting Returning Officer's Representations

No adverse feedback has been received post the May & July 2024 elections.

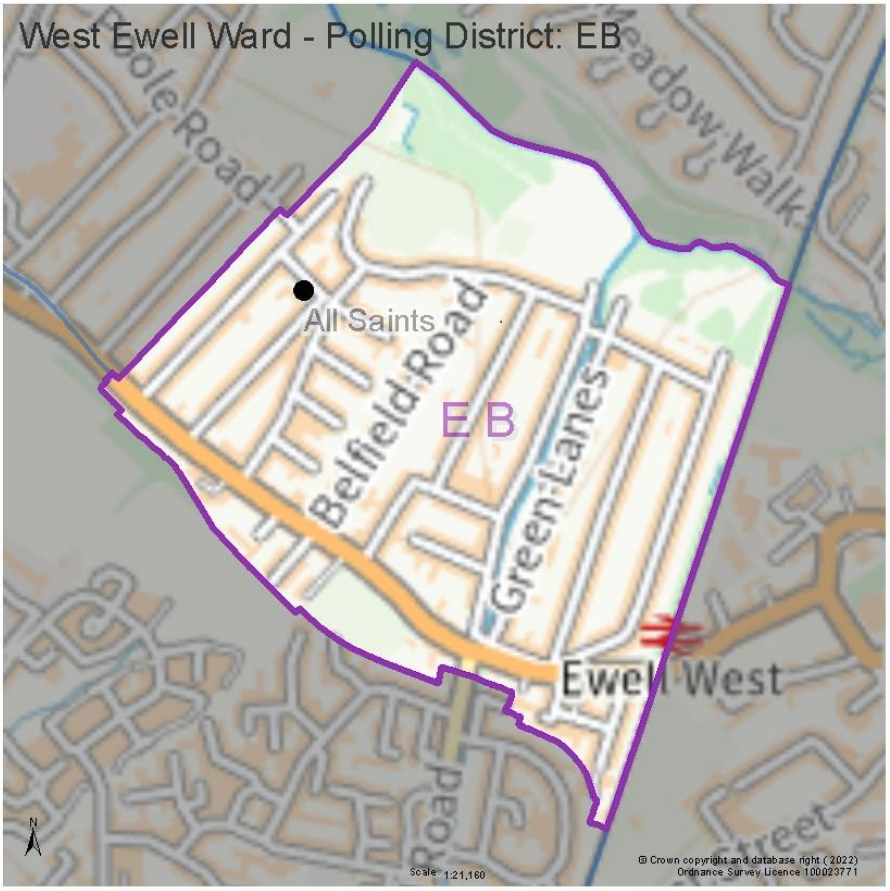
No changes are proposed to the polling district at this time.

I consider the polling district and polling place appropriate.

West Ewell Ward (cont)

Polling District	**E(B)**
Electorate in District:	**2969**
Postal Voters	**378**
Polling Place	All Saints Church Community Centre Fulford Road, West Ewell KT19 9QY
No. of Stations	2
Map Ref.	**8**
Proposal	No change
Comments	Premises and location satisfactory Disabled access – good Parking – limited off-street parking available on site otherwise on-street parking in residential road.

Polling District 2024



Acting Returning Officer's Representations

No adverse feedback has been received post the May & July 2024 elections.

No changes are proposed to the polling district at this time.

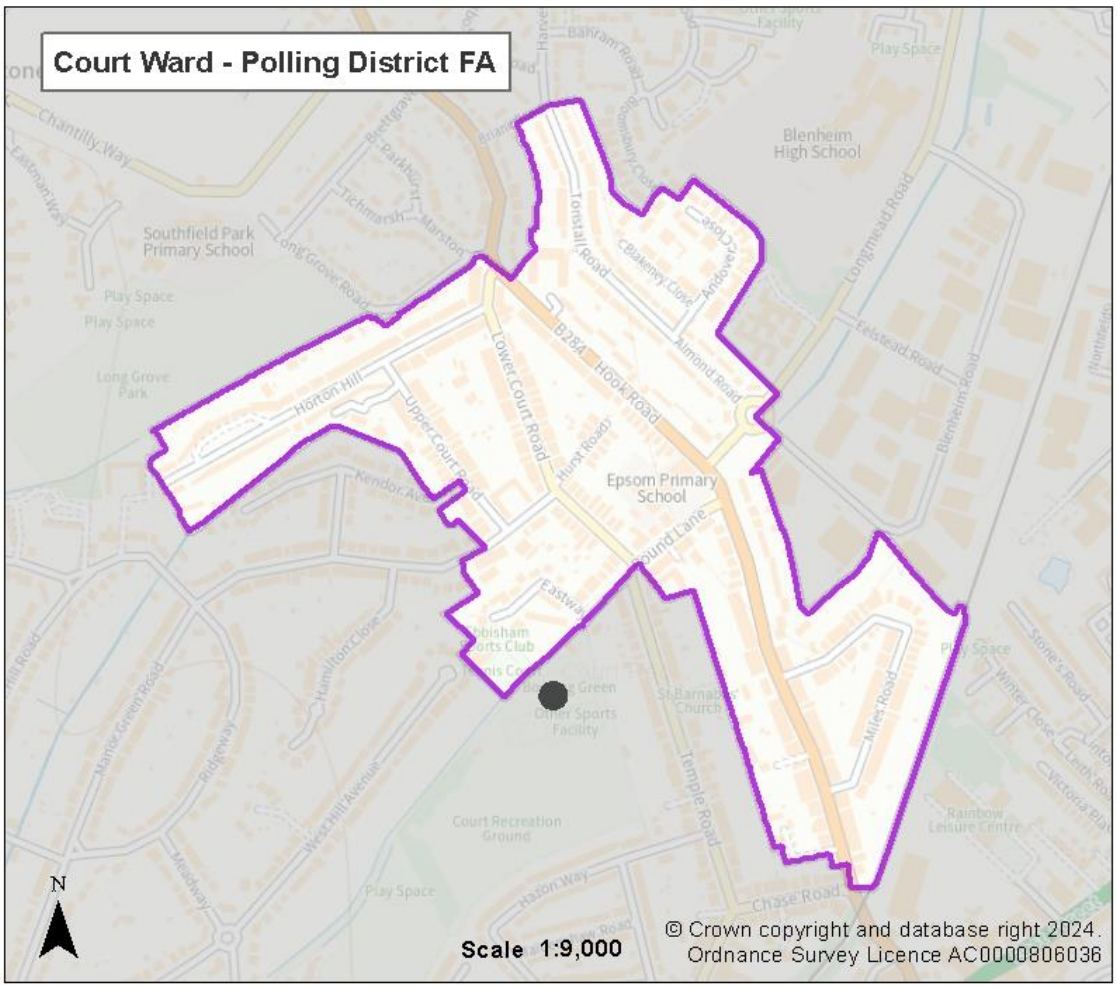
I consider the polling district and polling place appropriate.

Court Ward

Number of Polling Districts: Three
Number of Polling Places: Two
Electorate in Ward: **4699**
Postal Voters in Ward **568**

Polling District	**FA**
Electorate in District	**2087**
Postal Voters	**267**
Polling Place	Bowling Pavilion, Court Recreation Ground, Pound Lane, Epsom KT19 8SB
No. of Stations	1
Map Ref.	**9**
Proposal	Change – merge with existing district FB(2) to amend the Polling District to be as shown on the map below.
Comments	Premises and location satisfactory Disabled access – good Parking – off-street parking available in adjacent car park

Polling District 2024



Acting Returning Officer's Representations

No adverse feedback has been received following the May & July 2024 elections.

However, during a previous review, the neighbouring polling district FB was split into 2 districts due to the ward being in 2 different County Council electoral divisions. It was agreed to revisit the arrangements for the ward after the 2024 Surrey County Council Electoral boundary review finished. The County review finished with no changes to the polling district known as FB(2), in so much as it is not moving into a different County division.

As a result voters in FB(1) are in the West Ewell County Council division but voters in FB(2) are in the Epsom West County Council division, which is the same division as voters in FA. If these voters attend the same polling station at a County Council election it creates a risk of ballot papers being placed in a ballot box for the incorrect electoral division.

It is therefore recommended that the polling district currently called FB(2) is merged with FA and voters will vote at the Court Recreation Ground Pavilion at all future elections to remove the risk of cross contamination of ballot papers. For clarity, this will not change the electoral ward or division for any voter, only the polling station that they vote in.

Court Recreation Ground currently hosts a single polling station and the potential increase in numbers of in person voters may require it to be split into 2 stations, although there are currently 4 other single polling stations (AB-St Mary's, EA – Epsom Vineyard, LA -Alex Rec Pavilion, LB – Church House) with comparable number of electors allocated. A further site visit is recommended to ascertain if the venue is large enough to accommodate a double polling station or not.

If the above merge is not approved voters in FB(2) will continue to vote alongside FB(1) voters at the Wellbeing Centre at Longmead. This will require a clear division of the polling place on polling day to ensure that voters are issued the correct ballot papers and once voted those papers go in the correct ballot box.

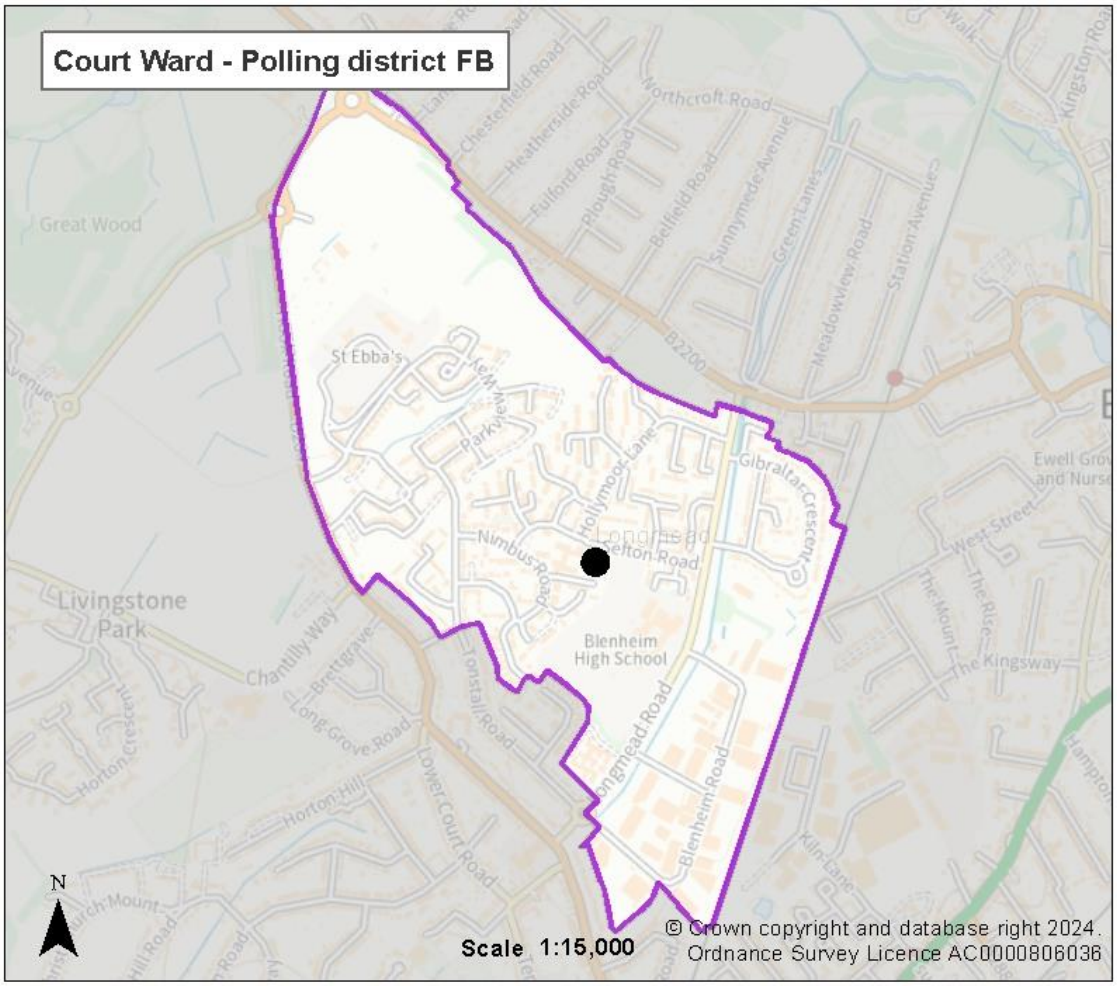
It is proposed that this polling district is merged with polling district FB(2) which is in the same County Council electoral division and that the combined district is named FA.

I consider the proposed changes to the polling district and polling place appropriate

Court Ward (cont)

Polling District	**FB**
Electorate in District	**2612**
Postal Voters	**301**
Polling Place	Community and Wellbeing Centre, Sefton Road, Epsom KT19 9HG
No. of Stations	2
Map Ref.	**10**
Proposal	Change – existing district FB(2) to be merged with district FA as detailed above. District FB(1) to be renamed FB as shown in the map below.
Comments	Council-owned premises Premises and location satisfactory Disabled access – good Parking – off-street parking available on site. The polling station is located in the main hall.

Polling District 2024



Court Ward FB (cont)

Acting Returning Officer's Representations

No adverse feedback has been received post the May & July 2024 elections.

However, during a previous review, the polling district FB was split into 2 due to the ward being in 2 different County Council electoral divisions. It was agreed to revisit the arrangements for the ward after the 2024 County Council boundary review finished. The County review finished with no changes to the polling district known as FB(2), in so much as it is not moving into a different County division.

As a result voters in FB(1) are in the West Ewell County division but voters in FB(2) are in the Epsom West County division, which is the same division as voters in FA. If these voters attend the same polling station at a County Council election it creates a risk of ballot papers being placed in a ballot box for the incorrect electoral division.

It is therefore recommended that the polling district currently called FB(2) is merged with FA and voters will vote at the Court Recreation Ground Pavilion at all future elections which will remove the risk of cross contamination of ballot papers. For clarity, this will not change the electoral ward or division for any voter, only the polling station that they visit.

It is proposed that polling district FB(2) is merged with polling district FA which is in the same County Council electoral division. This is also detailed in the representation for polling district FA (above). It is proposed that polling district FB(1) is renamed FB as shown in the map above.

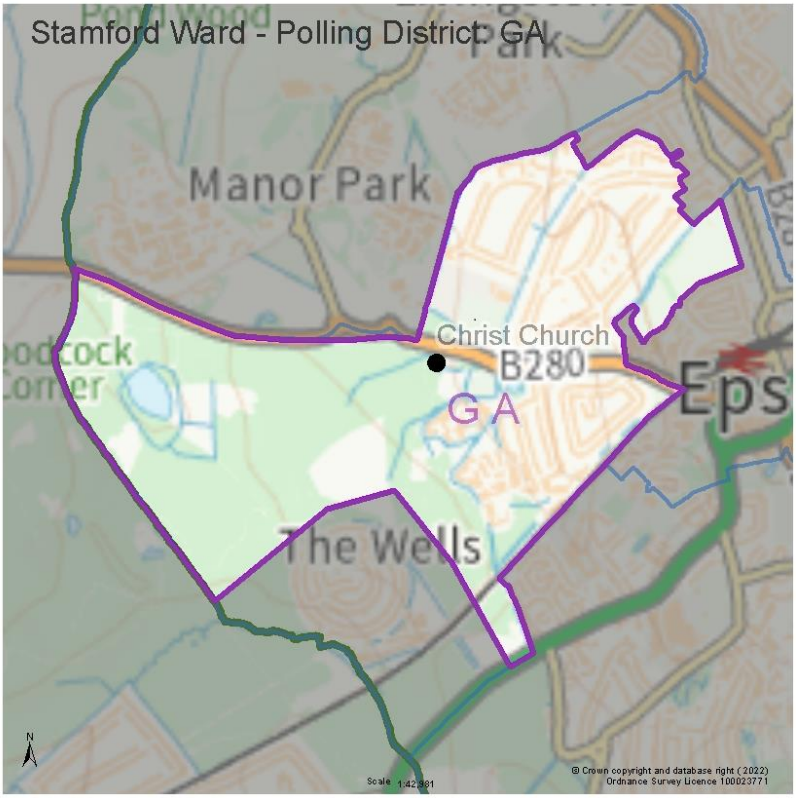
I consider the proposed changes to the polling district and polling place appropriate.

Stamford Ward

Number of Polling Districts	Two
Number of Polling Places	Two
Electorate in Ward	**3713**
Postal Voters in Ward	**637**

Polling District	**G(A)**
Electorate in District	**2706**
Postal Voters	**511**
Polling Place	Church Hall, Christ Church, Christ Church Road Epsom KT19 8NE
No. of Stations	2
Map Ref.	**11**
Proposal	No change
Comments	Premises satisfactory. Location – adequate Disabled access - adequate Parking – car park available on site but not immediately adjacent to building. On-street parking is also available.

Polling District 2024



Stamford Ward GA (cont)

Acting Returning Officer's Representations

No adverse feedback has been received post the May & July 2024 elections.

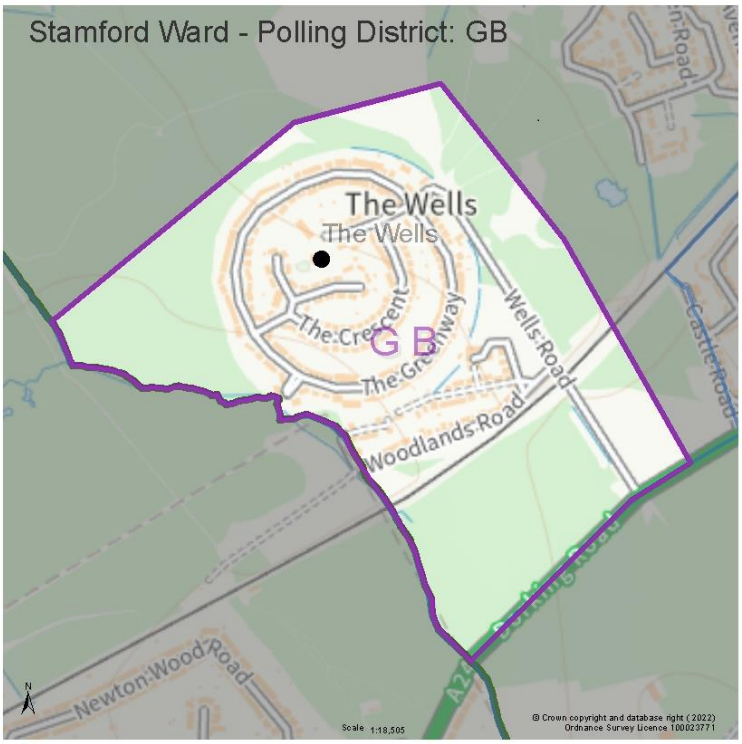
No changes are proposed to the polling district at this time.

I consider the polling district and polling place appropriate.

Stamford Ward (cont)

Polling District	**G(B)**
Electorate in District	**1007**
Postal Voters	**126**
Polling Place	The Wells Community Centre, Spa Drive, Epsom KT18 7LR
No. of Stations	1
Map Ref.	**12**
Proposal	No change
Comments	Council-owned premises Premises and location satisfactory Disabled access – Good Parking – good – car park on site. The centre has now re-opened and run by The Epsom Wells Community Association) a local community group.

Polling District 2024



Stamford Ward G(B) cont

Acting Returning Officer's Representations

No adverse feedback has been received post the May & July 2024 elections.

No further changes are proposed to the polling district at this time.

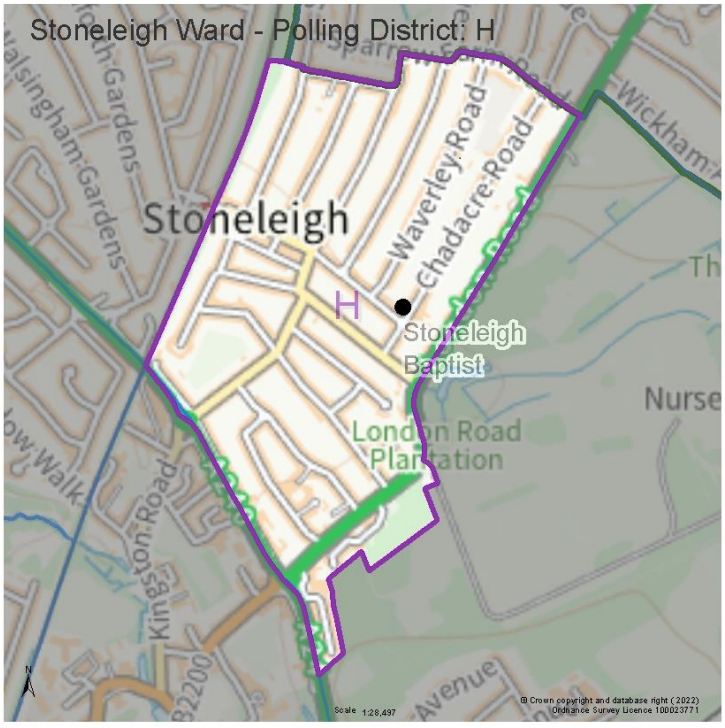
Subject to the above comments, I consider the polling district and polling place appropriate.

Stoneleigh Ward

Number of Polling Districts: One
Number of Polling Places: One
Electorate in Ward: **3673**
Postal Voters **503**

Polling District	**H**
Electorate in District	**3673**
Postal Voters	**503**
Polling Place	Stoneleigh Baptist Church Hall, The Glade, Stoneleigh KT17 2HL
No. of Stations	2
Map Ref.	**13**
Proposal	No change
Comments	Premises and location satisfactory Disabled access - good Parking – limited off street parking available. On-street parking available around venue

Polling District 2024



Acting Returning Officer's Representations

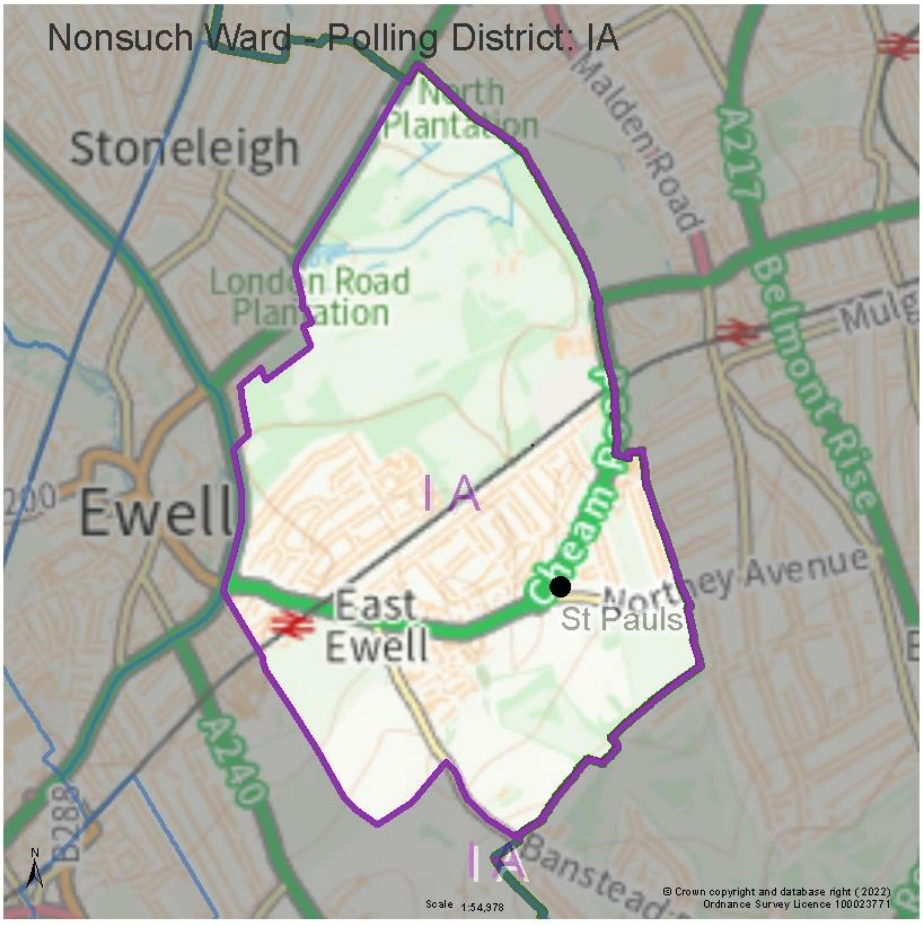
No adverse feedback has been received post the May & July 2024 elections.
No changes are proposed to the polling district at this time.
I consider the polling district and polling place appropriate.

Nonsuch Ward

Number of Polling Districts: Two
Number of Polling Places: Two
Electorate in Ward: **5306**
Postal Voters **978**

Polling District	**I(A)**
Electorate in District	**3516**
Postal Voters	**621**
Polling Place	St Paul's Church Centre, 15 Northey Avenue, Cheam SM2 7HS
No. of Stations	2
Map Ref.	**14**
Proposal	No change
Comments	Premises and location satisfactory Disabled access - good Parking – off-street parking available on site. On-street parking available around venue

Polling District 2024



Nonsuch Ward IA (cont)

Acting Returning Officer's Representations

No adverse feedback has been received post the May & July 2024 elections.

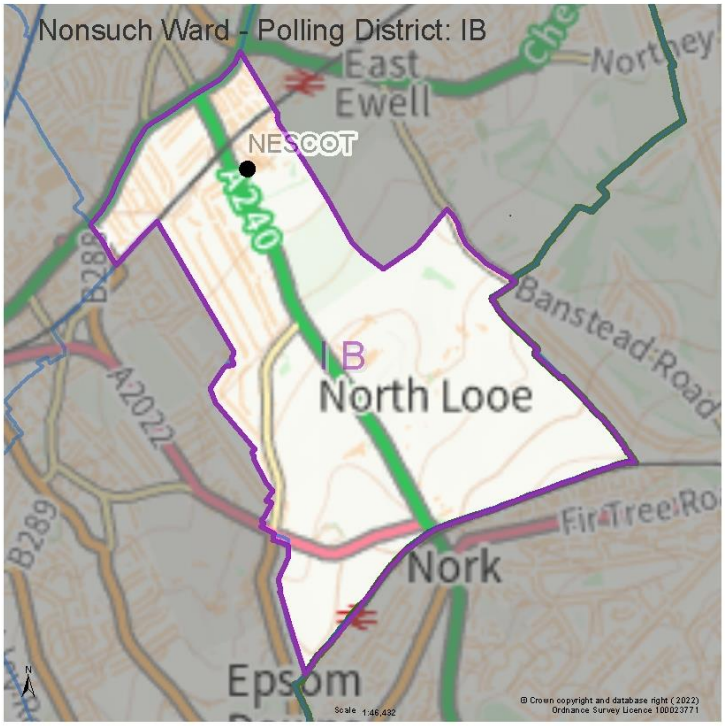
No changes are proposed to the polling district at this time.

I consider the polling district and polling place appropriate.

Nonsuch Ward (cont)

Polling District	**I(B)**
Electorate in District	**1790**
Postal Voters	**357**
Polling Place	NESCOT College, Reigate Road, Ewell KT17 3DS
No. of Stations	1
Map Ref.	**15**
Proposal	No change
Comments	Premises and location satisfactory Disabled access – good Parking – off street parking available in large car park close to venue.

Polling District 2024



Nonsuch Ward IB (cont)

Acting Returning Officer's Representations

In 2024 neither the theatre nor other suitable accommodation was available in the main buildings so to continue to use NESCOT we instead had a temporary polling station unit in the main car park. The unit was able to be placed away from the main buildings and worked well for voters.

No adverse feedback has been received post the May & July 2024 elections.

Subject to the above comments being accepted I consider the proposals for the continued use of NESCOT to be appropriate and no changes are proposed to the polling district at this time.

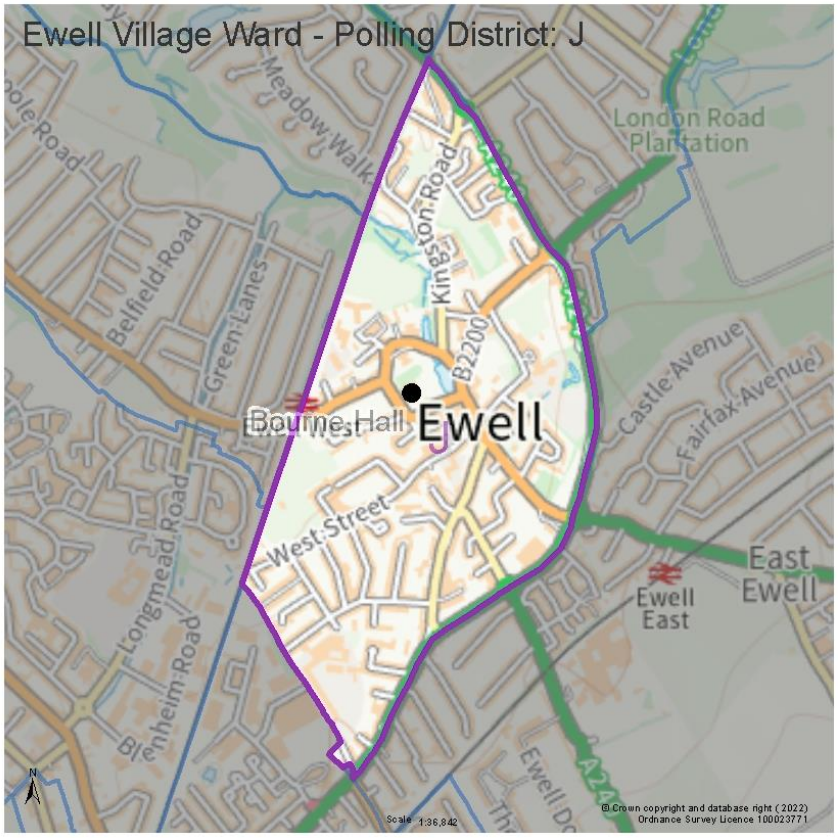
I consider the polling district and polling place appropriate.

Ewell Village Ward

Number of Polling Districts: One
Number of Polling Places: One
Electorate in Ward: **3414**
Postal Voters **517**

Polling District	**J**
Electorate in District	**3414**
Postal Voters	**517**
Polling Place	Bourne Hall, Spring Street, Ewell KT17 1UF
No. of Stations	2
Map Ref.	**16**
Proposal	No changes
Comments	Council-owned premises Premises and location satisfactory Disabled access - good Parking – off-street parking available (public car park). The polling stations are normally located in the Rose Room.

Polling District 2024



Ewell Village Ward J (cont)

Acting Returning Officer's Representations

No adverse feedback has been received post the May & July 2024 elections.

No changes are proposed to the polling district at this time.

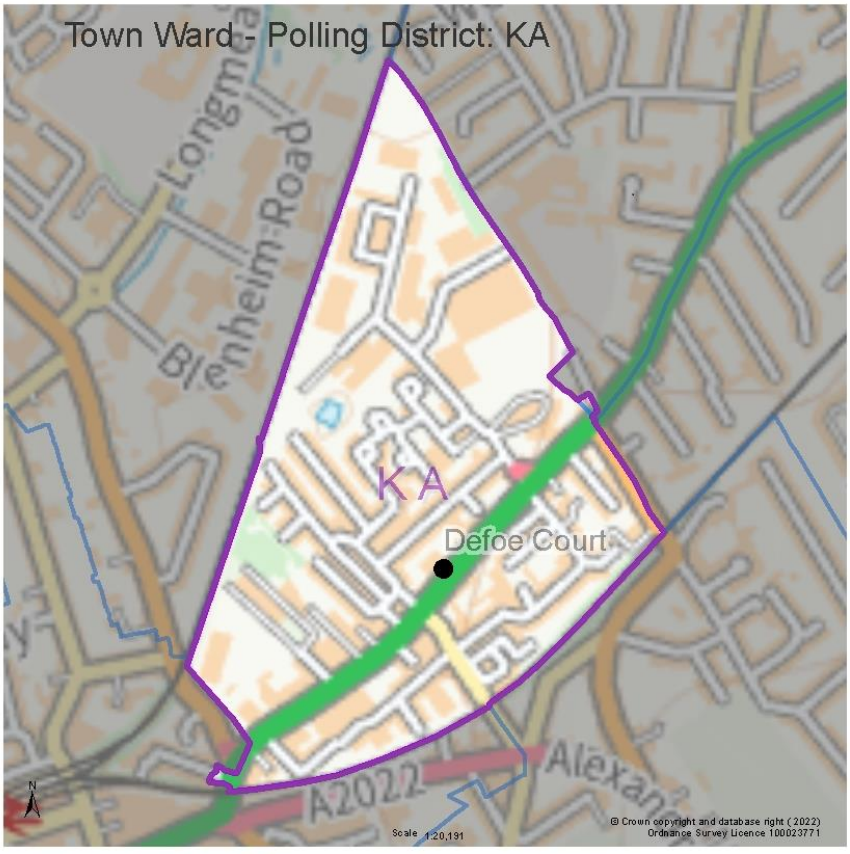
I consider the polling district and polling place appropriate.

Town Ward

Number of Polling Districts	Three
Number of Polling Places	Three
Electorate in Ward	**5429**
Postal Voters	**741**

Polling District	**K(A)**
Electorate	**1869**
Postal Voters	**273**
Polling Place	Defoe Court, 87 East Street, Epsom KT17 1AQ
No. of Stations	1
Map Ref.	**17**
Proposal	No change
Comments	Premises and location satisfactory Disabled access - good Parking – no parking available The polling station is located in the conference room.

Polling District 2024



Town Ward KA (cont)

Acting Returning Officer's Representations

No adverse feedback has been received post the May & July 2024 elections.

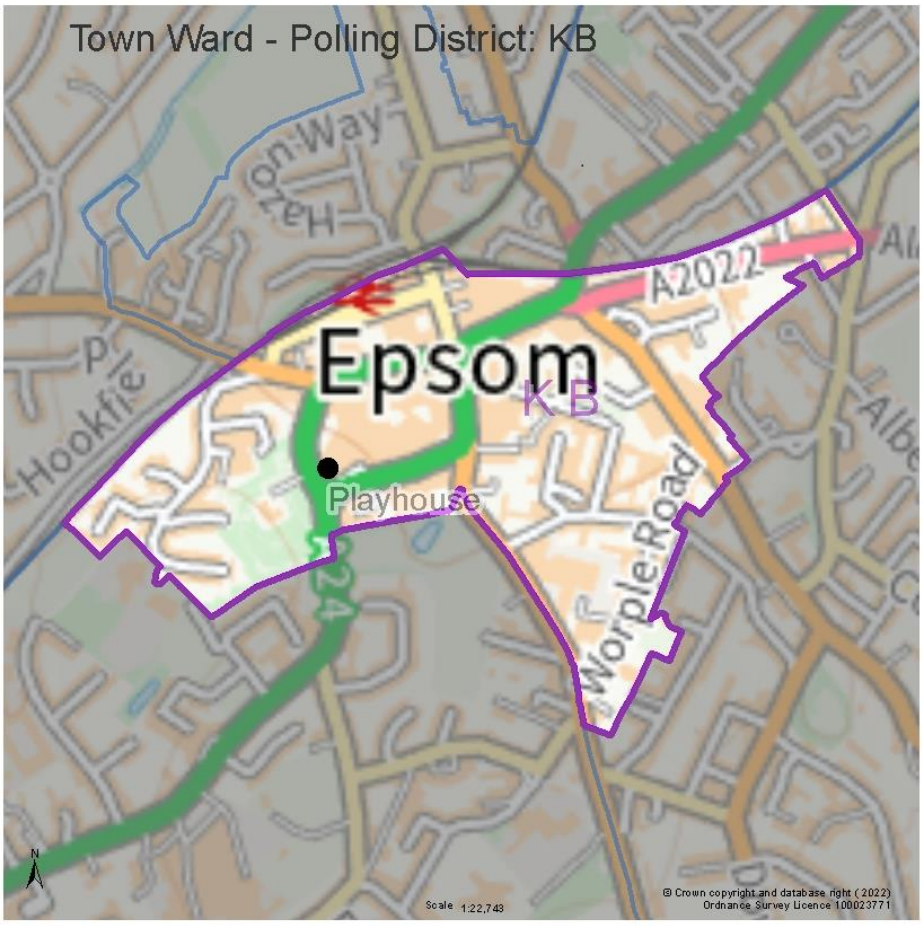
No changes are proposed to the polling district at this time.

I consider the polling district and polling place appropriate.

Town Ward (cont)

Polling District	**K(B)**
Electorate in District	**2393**
Postal Voters	**301**
Polling Place	Epsom Playhouse, Ashley Avenue, Epsom KT18 5AL
No. of Stations	1
Map Ref.	**18**
Proposal	No change
Comments	Council owned premises Premises and location satisfactory Disabled access - good Parking - Multi storey public car park adjacent to Playhouse. No on-street parking close to venue. The Polling Station is normally located in the Myers Hall.

Polling District 2024



Town Ward KB (cont)

Acting Returning Officer's Representations

No adverse feedback has been received post the May & July 2024 elections.

For the Parliamentary election in July 2024 this polling place hosted 2 polling stations due to the expected high turnout. It is anticipated that for local elections this will reduce back down to a single polling station again.

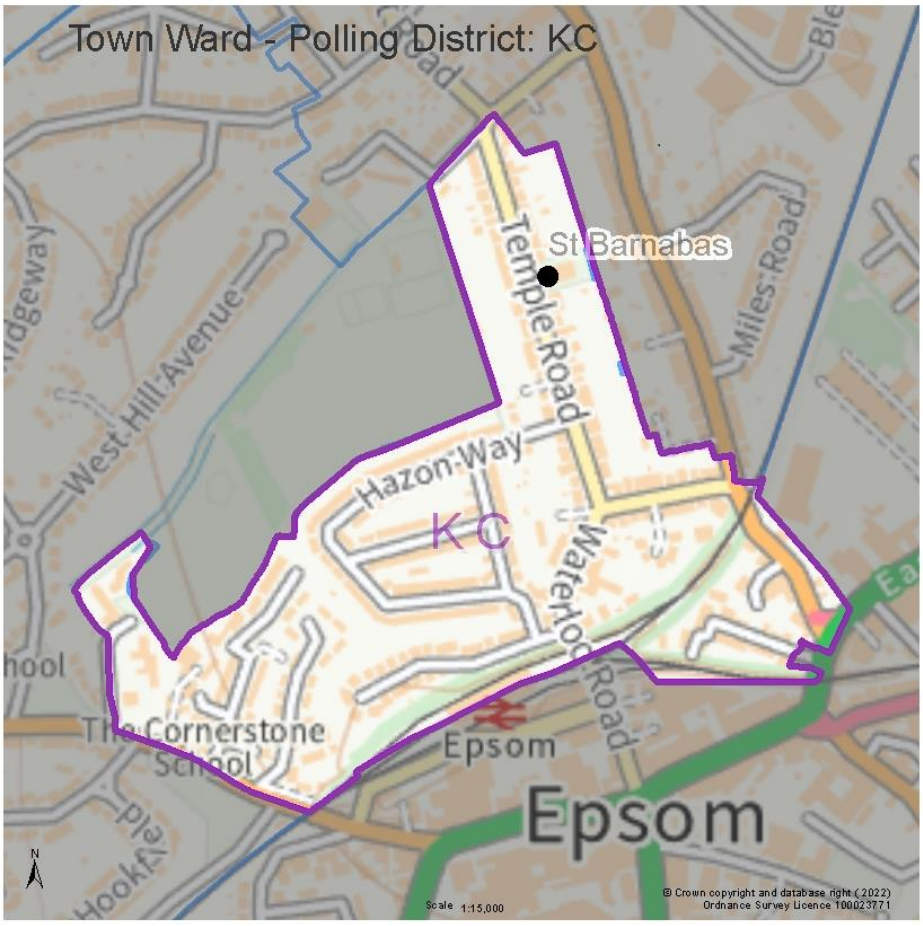
No changes are proposed to the polling district at this time.

I consider the polling district and polling place appropriate.

Town Ward (cont)

Polling District	**K(C)**
Electorate in District	**1167**
Postal Voters	**167**
Polling Place	St Barnabas Church, Temple Road, Epsom KT19 8TU
No. of Stations	1
Map Ref.	**19**
Proposal	No change to polling place
Comments	Premises and location good Disabled access - good Parking – off-street parking available on site.

Polling District 2024



Acting Returning Officer's Representations

No adverse feedback has been received post the May & July 2024 elections.

No changes are proposed to the polling district at this time.

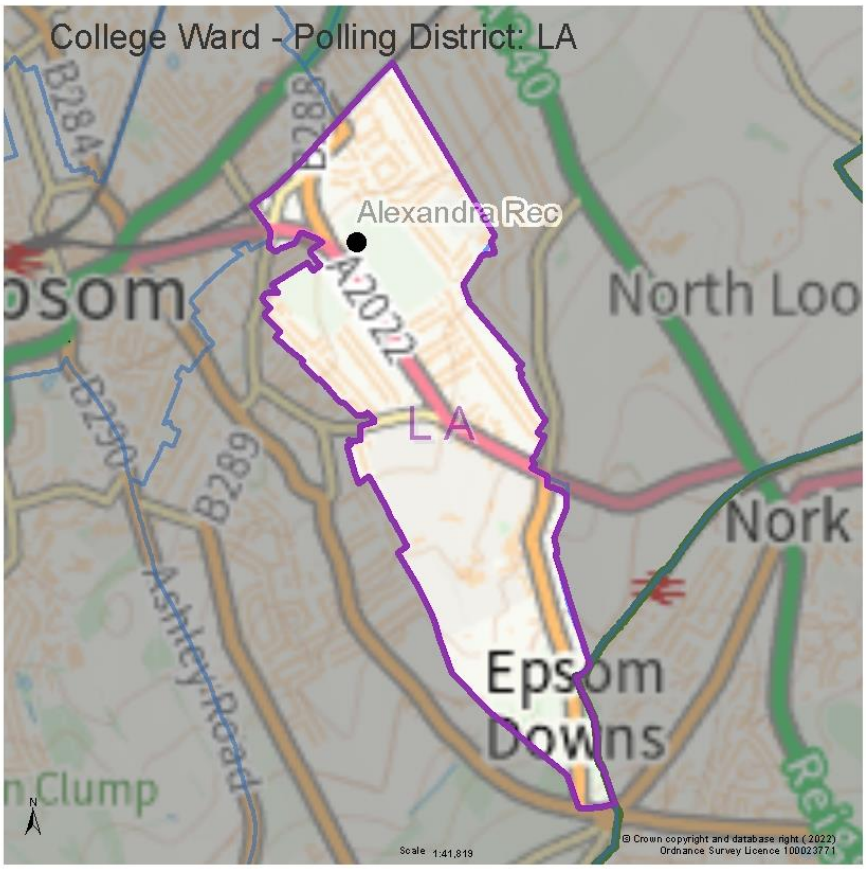
I consider the polling district and polling place appropriate.

College Ward

Number of Polling Districts	Two
Number of Polling Places	Two
Electorate in Ward	**5151**
Postal Voters	**1071**

Polling District	**L(A)**
Electorate in District	**2225**
Postal Voters	**446**
Polling Place	The Pavilion, Alexandra Recreation Ground, Alexandra Road, Epsom KT17 4BU
No. of Stations	1
Map Ref.	**20**
Proposal	No change
Comments	Council owned premises Premises and location satisfactory Disabled access - Adequate Parking – close to pavilion for staff & disabled. In main car park for other voters.

Polling District 2024



College Ward LA (cont)

Acting Returning Officer's Representations

No adverse feedback has been received post the May & July 2024 elections.

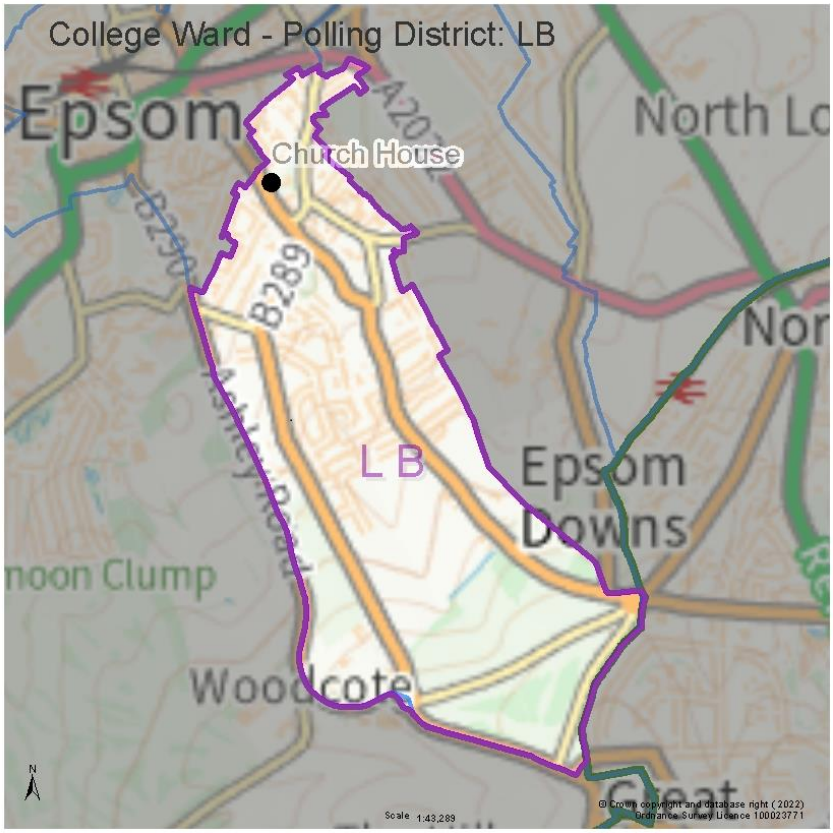
No changes are proposed to the polling district at this time.

I consider the polling district and polling place appropriate.

College Ward (cont)

Polling District	**L(B)**
Electorate in District	**2926**
Postal Voters	**625**
Polling Place	The Church House, Church Street, Epsom KT17 4PX
No. of Stations	1
Map Ref.	**21**
Proposal	No change
Comments	Premises and location satisfactory Disabled access - good Parking – off-street parking available on site. No on-street parking close to venue. The venue has worked very well for many years and depending on the number of postal voters should be able to accommodate a double polling station if required. As far as the Council is aware, there are no other suitable premises (halls etc) within the College Ward/Polling District boundaries. The polling station is normally located in The Wisley Room.

Polling District 2024



College Ward LB (cont)

Acting Returning Officer's Representations

No adverse feedback has been received post the May & July 2024 elections.

This polling station historically has a high turnout of voters and to prepare for the type of increased turnout expected at a Parliamentary election the upstairs room was used for the PCC elections in May which worked fine. For the 4 July Parliamentary election both the upstairs and downstairs rooms (Wisley Room) were booked and again this was fine although at a non-national election we would most likely revert back to a single polling station as the venue.

No changes are proposed to the polling district at this time.

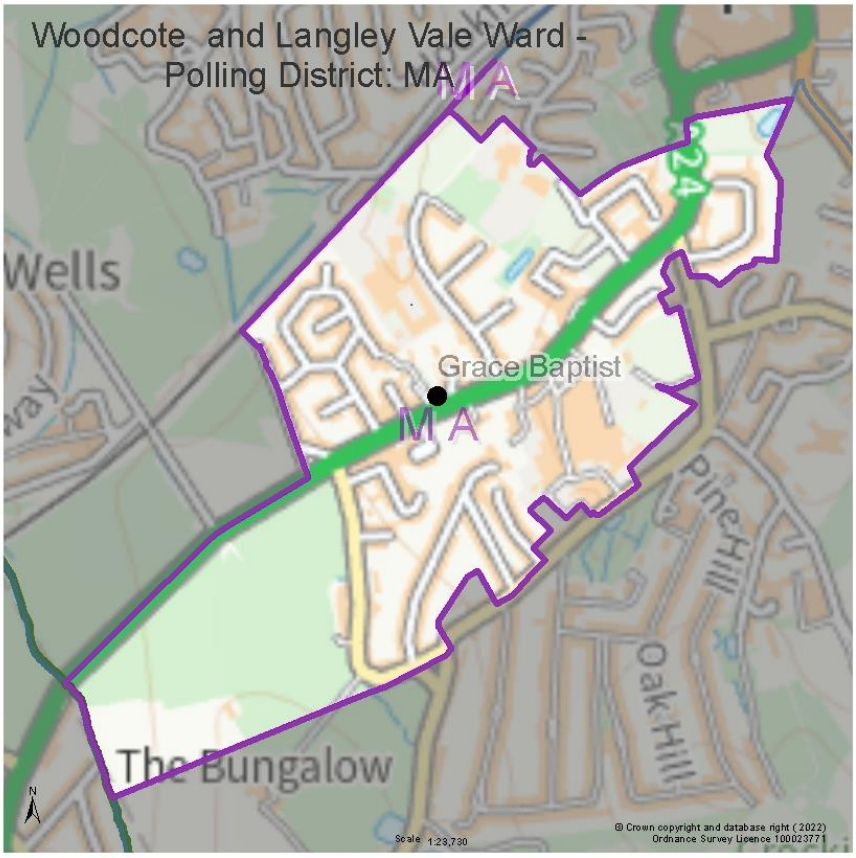
I consider the polling district and polling place appropriate.

Woodcote and Langley Vale Ward

Number of Polling Districts	Three
Number of Polling Places	Three
Electorate in Ward	**4545**
Postal Voters	**895**

Polling District	**M(A)**
Electorate in District	**1543**
Postal Voters	**305**
Polling Place	Grace Baptist Church, 32 Dorking Road, Epsom KT18 7NH
No. of Stations	1
Map Ref.	**22**
Proposal	No change
Comments	Premises and location satisfactory Disabled access - adequate Parking – limited off-street parking on site

Polling District 2024



Woodcote and Langley Vale Ward MA (cont)

Acting Returning Officer's Representations

No adverse feedback has been received post the May & July 2024 elections.

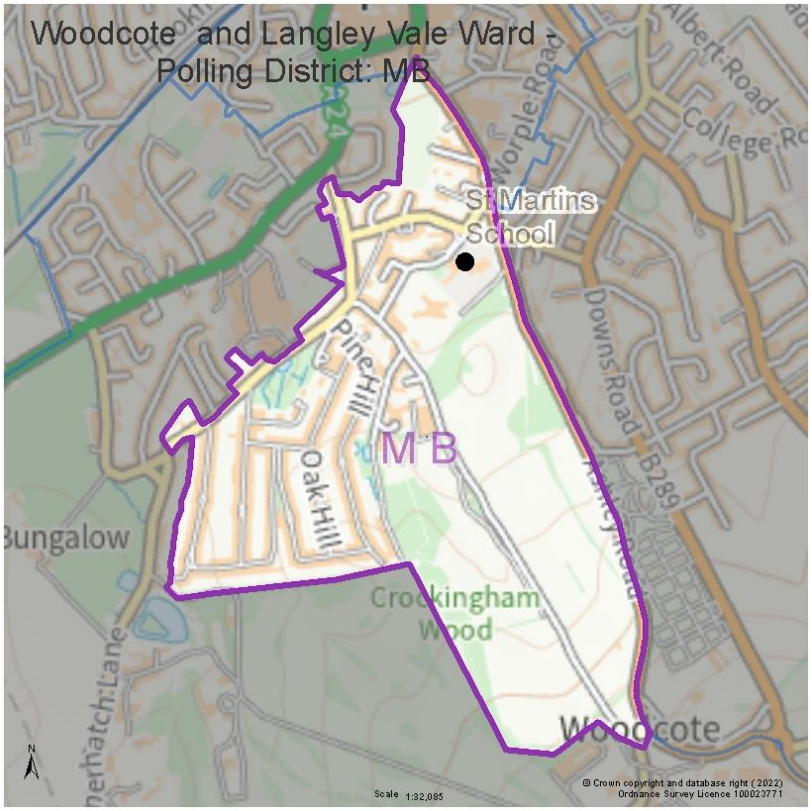
No changes are proposed to the polling district at this time.

I consider the polling district and polling place appropriate.

Woodcote and Langley Vale Ward (cont)

Polling District	**M(B)**
Electorate in District	**1685**
Postal Voters	**375**
Polling Place	St. Martins C of E Junior School, Ashley Road, Epsom KT18 7AD
No. of Stations	1
Map Ref.	**23**
Proposal	No change
Comments	Premises and location satisfactory Disabled access – adequate Vehicle access via Worple Road only Parking – off-street parking available on school premises It is Council policy to avoid the use of schools wherever possible but there are no other suitable premises in the area. Schools are notified of scheduled elections as early as possible, preferably before the start of the academic year, to allow them the option of setting an INSET day. The polling station is located in the Childrens Centre as this building is separate from the main building and can be cordoned off from the rest of the school so that it can remain open on polling day.

Polling District 2024



Woodcote and Langley Vale Ward MB (cont)

Acting Returning Officer's Representations

It is recognised that the location of the current polling place in a school is not entirely satisfactory, but enquiries have failed to identify any premises suitable for designation as a polling place elsewhere in the ward and there would be a significant cost implication in providing temporary accommodation even if a suitable location could be found.

Following the elections in May 2023 the school asked that the Children Centre be used instead of the usual location (Music Block). A site visit was undertaken to investigate the suitability of this building i.e., disabled access/parking etc. and it was agreed to trial the use of the new location for the PCC elections in May 2024. This trial went well and the school, parents and voters were all satisfied with the new arrangements so moving forward this will be the polling station location.

No changes are proposed to the polling district at this time.

I consider the polling district to be appropriate and in the absence of any suitable alternatives I consider the polling place appropriate.

Woodcote and Langley Vale Ward (cont)

Polling District	**M(C)**
Electorate in District	**1317**
Postal Voters	**215**
Polling Place	Langley Vale Village Hall, Rosebery Road, Epsom KT18 6AF
No. of Stations	1
Map Ref.	**24**
Proposal	No change
Comments	Premises and location satisfactory Disabled access - good Parking – on-street parking available around venue.

Polling District 2024

Woodcote and Langley Vale Ward MC (cont)

Acting Returning Officer's Representations

During previous reviews there were concerns about accessibility for disabled people due to the sloping access to the Village Hall. It was suggested that the adjacent Church Hall or the school at Langley Vale might be a more appropriate venue.

It is Council policy to avoid the use of schools wherever possible and the school is less conveniently located than the current polling station. A site visit was made to the Church Hall and although the slope to the building is less than at the Village Hall, the layout of the building was considered unsuitable as a polling place and there would be no advantage in relocating there.

No adverse feedback has been received post the May & July 2024 elections.

No changes are proposed to the polling district at this time

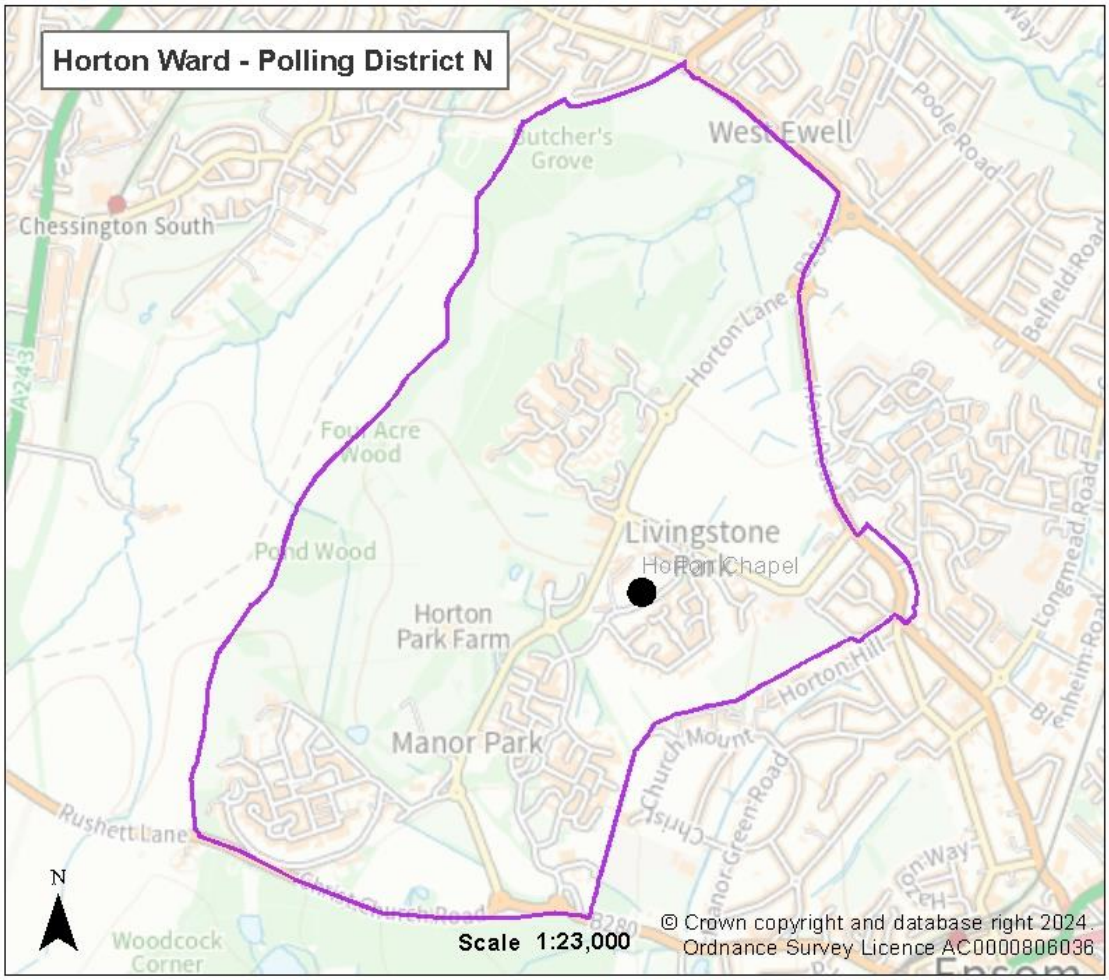
I consider the polling district and polling place appropriate.

Horton Ward

Number of Polling Districts	One
Number of Polling Places	One
Electorate in Ward	**3339**
Postal Voters	**661**

Polling District	**N**
Electorate in District	**3339**
Postal Voters	**661**
Polling Place	The Horton Arts Centre, Haven Way, Epsom KT19 8NP
No. of Stations	2
Map Ref.	**25**
Proposal	Change
Comments	Premises and location satisfactory Disabled access - good Parking – venue car park on site Due to the change of county division boundary merge N1 & N2 into a single ward/polling district

Polling District 2024



Horton Ward (cont)

Acting Returning Officer's Representations

The use of the Horton Arts Centre in May 2023 worked well, and we hope to continue to use it as a polling place for all future elections.

No adverse feedback has been received post the May & July 2024 elections.

The reason the polling district was split into 2 was due to the ward being in 2 different County Council electoral divisions. However the County Council boundary review is now finished and the outcome of the review means that voters in the Clarendon Park part of the Ward N(2) will be moving from the West Ewell division into the Epsom West Division. It is proposed to merge the polling districts and the ward will simply be known as Horton – N. This will also assist with the allocation of streets/electorate to the 2 polling stations at the venue so that each polling station has a single register instead of 2 as is currently set up.

I consider the polling district proposals to be appropriate and the polling place to be suitable.

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REFORM OF PLANNING COMMITTEES AND NATIONAL SCHEME OF DELEGATION

Head of Service:	Piero Ionta, Head of Legal and Monitoring Officer
Report Author:	Dan Clackson
Wards affected:	(All Wards)
Appendices (attached):	Appendix 1 – Updated Appendix 2.1 of the Constitution (Planning Scheme of Delegation excerpt). Appendix 2 – Updated Appendix 3 of the Constitution (Planning Committee Terms of Reference excerpt). Appendix 3 – Updated Annex 4-8 of the Operating Framework. Appendix 4 – Schedule 1 and Schedule 2 applications

Summary

Changes to the Town and Country Planning Act 1990 and the publication of Regulations made under that Act require changes to the Council's Constitution to reflect a new National Scheme of Delegation for planning applications, with a deadline of 31 October 2026 for all Councils in England to amend their Constitution to bring them in line with the new regulations.

Recommendation (s)

The Council is asked to:

(1) Approve the proposed changes to Appendices 2.1 and 3 of the Constitution and Annex 4.8 of the Operating Framework, as set out within Appendices 1, 2 and 3 to this report, and agree that they will be implemented from 31 October 2026, following the final publication of the Government's Planning Committee Reform Regulations and Guidance.

(2) Appoint the Chair of the Planning Committee as this Council's Nominated Member, and appoint the Vice-Chair of the Planning Committee to deputise for them in their absence.

(3) Appoint the Head of Development Management and Planning Enforcement as this Council's Nominated Officer, and appoint both the Head of Planning

Policy and Economic Development and the Planning Development Team Leader to deputise for them in their absence.

(4) Delegate authority to the Nominated Officer, having first consulted with the Nominated Member, to determine appropriate triaging arrangements in relation to 'Schedule 2' and 'Own-Interest' planning applications.

(5) Delegate authority to the Monitoring Officer to make any consequential amendments, further to consulting with Chair of the Planning Committee and Standards and Constitution Committee, to Appendices 2.1 and 3 of the Constitution and Annex 4.8 of the Operating Framework.

1 Reason for Recommendation

1.1 There is a requirement for Councils to update their Constitution to align with the National Scheme of Delegation by 31 October 2026 to accord with the National Scheme of Delegation of Planning Functions.

2 Background

2.1 The Ministry of Housing, Communities and Local Government ('MHCLG') carried out a statutory consultation on draft Regulations and guidance to implement planning committee reforms under the Planning and Infrastructure Act 2025 from 26 March 2026 to 23 April 2026. This followed an earlier consultation in 2025.

2.2 The government's aim behind the national scheme of delegation is to ensure that there is greater clarity and consistency about the role of planning committees in planning decision making.

2.3 The Town and Country Planning (Discharge of Local Planning Authority Functions) (England) Regulations 2026 (The Regulations) were made on 15 July 2026 and will introduce a national scheme of delegation and a limit on Planning Committee sizes. The Government response to the consultation advises that the new regulations come into force on 31 October 2026.

2.4 The Regulations, specifically Regulation 4, sets out application types into Schedule 1 and Schedule 2 (set out in Appendix 4).

3 Schedule 1 and Schedule 2 Applications

3.1 **Schedule 1: Always to be determined by an officer**

3.2 Regulation 4 requires that applications listed under Schedule 1 are to be delegated to officers for determination. A copy of Schedule 1 is set out in Appendix 4 of this report.

3.3 **Schedule 2: Presumed to be determined by Officers, but may be referred to Planning Committee by the Nominated Member and Officer**

3.4 Regulation 5 provides that applications in Schedule 2 are presumed delegated unless they are formally referred to committee by the 'Gatekeepers' (see section 4 of this report). A copy of Schedule 2 is set out in Appendix 4 of this report.

3.5 If the authority has not made arrangements to refer, or if the referral conditions are not met, the application must be determined by an officer, unless Regulation 5 is applied.

4 Referral of Applications to Committee

4.1 The draft guidance sets out that referral of applications to Planning Committee should be due to exceptional circumstances, and not a standard practice.

4.2 It introduces a 'Gatekeeper' model - the Gatekeepers are as follows:

- The Nominated Officer (expected to be the Chief Planning Officer or equivalent, with potential for substitutes in their absence) and
- the Nominated Member (expected to be the Planning Committee Chair or equivalent, with potential for substitutes)

4.3 It is recommended that the Nominated Officer should be the Head of Development Management and Planning Enforcement. The Nominated Member should be the Chair of the Planning Committee and in their absence the Vice Chair of the Planning Committee.

4.4 A Schedule 2 application will only be referred to Planning Committee where both Gatekeepers agree that the application should be referred. If they cannot agree, it must be delegated to Officers for determination.

4.5 Under Regulation 5(3), a Schedule 2 application can only be considered for referral where at least one statutory criterion is met:

a) It raises a significant planning matter having regard to the development plan and other material considerations; or
b) It raises an economic, social or environmental issue of significance to the local area.

4.6 There is no definition of what constitutes 'significant' as it depends on the local area. It may include, for instance, outline planning permission for a large allocated residential development or changes to a notable listed building.

4.7 The guidance does not require that the Gatekeepers consider all Schedule 2 applications, and it also anticipates Local Planning Authorities ('LPAs') setting up triage arrangements if referral volumes become high, to avoid delays.

4.8 There is also an expectation in the Guidance for LPAs to keep a record of the cases considered by the Nominated Officer and Member for referral, the outcome of their consideration and reasons for their decision. This should be reported to the Planning Committee on a regular basis and made available on the Council's website. It is recommended that the Planning Committee receive and review on a quarterly basis the record of the cases the nominated officer and nominated member have considered for referral to committee. This would occur in the same manner that planning, enforcement and appeal performance is currently reported.

4.9 The procedures for referring applications to the Nominated Officer and Nominated Member would be at the Council's discretion and this would be one of the only aspects that Members could make specific to Epsom & Ewell.

4.10 Under Regulation 6, the guidance suggests that for applications on behalf of the Local Authority, Member or Officers, it may be appropriate for some applications to be referred to Planning Committee even if they do not raise any significant planning, economic, social or environmental issues. The regulations make clear that such applications do not need to meet the same criteria for Gatekeepers to assess in terms of raising significant planning issues.

4.11 Where Planning Functions are not listed in Schedule 1 or 2 it is for the LPA to decide whether it should be delegated or referred as part of its local constitution.

4.12 The Nominated Officer – on the basis of recommendation four above being passed – will, in due course, produce a 'scheme of management' to set out administrative arrangements to support operation of the new Scheme of Delegation.

4.13 The likely overall effect of the Regulations is to reduce the number of planning applications referred to the Planning Committee. The changes therefore impact members and officers and will reduce the instances of residents attending Planning Committee to make verbal representations on applications of interest to them

4.14 The call in in process currently afforded to ward members is required to be dispensed with.

5 Timescales for changes to Constitution

5.1 There is a requirement for Councils to update their Constitution to align with the National Scheme of Delegation by 31 October 2026. Officers recommend agreement to the necessary changes to the Constitution as seen within the Appendices to this report, as well as delegation to the Monitoring Officer to make any changes as necessary following implementation of these changes. The risk of significant changes is considered to be minimal.

6 Risk Assessment

Legal or other duties

6.1 Equality Impact Assessment

6.1.1 None for the purposes of this report.

6.2 Crime & Disorder

6.2.1 None for the purposes of this report.

6.3 Safeguarding

6.3.1 None for the purposes of this report.

6.4 Dependencies

6.4.1 None for the purposes of this report.

6.5 Other

6.5.1 The Planning profession is concerned about the shift of responsibilities from committee to officers brought about by the national scheme of delegation. The Planning Officers' Society is recommending that councils put in place additional guidance to prevent inappropriate lobbying of officers and members, and for dealing with vexatious complaints. This report recommends that the Council adopts measures to try to protect officers and members from unreasonable and unacceptable behaviour when carrying out their duties. Additional text has therefore been incorporated into Annex 4-8. The Head of Development Management and Planning Enforcement will keep this under review and whether any further steps (e.g. a new procedure for dealing with vexatious customers) are required to protect officers.

6.5.2 A full impact assessment of the effect on the costs of business, the voluntary sector and the public sector at a national level was undertaken in relation to the amendments to the Act. This has been published at www.legislation.gov.uk/uksi/2026/854/impacts , together with an explanatory memorandum: www.legislation.gov.uk/uksi/2026/854/memorandum/contents

7 Financial Implications

7.1 There are no material financial implications arising directly from this report.

7.2 **Section 24 considerations:** The decisions to be taken under this report do not fall within the scope of the LGR section 24 Direction, as they are neither contractual nor land/property matters. As such, the Council can take the decisions proposed above

7.3 **Section 151 Officer's comments**: There are no direct financial implications but members should note there may be some officer resource requirements associated with the new governance and record-keeping arrangements. These are expected to be managed within existing budgets.

8 Legal Implications

8.1 The changes are mandatory and this Council needs to be ready to discharge its planning functions in accordance with the national scheme by 31 October 2026. To not do so will expose the Council to the risk of judicial review by anyone aggrieved by a decision made otherwise than in accordance with the national scheme.

8.2 Local authorities will need to amend the constitutions to align with the national scheme of delegation. Failure to do so may make decisions on whether to delegate applications to officers or refer them to committees for determination liable to judicial review.

8.3 **Legal Officer's comments**: Amendments to the Town and Country Planning Act and the introduction of regulations under S319ZZC of that Act, mandate changes to the Council's scheme of delegation as regards planning functions.

8.4 The Council must, after 31 October 2026, operate its scheme of delegation to reflect the requirements of these changes. Failure to do this will mean the Council is acting unlawfully and may expose some planning decisions to challenge by way of judicial review or complaint to the Local Government Ombudsman.

8.5 The recommendations in this report are intended to support compliance with the changes to the Act and the Regulations, including the necessary amendments to the Constitution and associated governance processes.

9 Policies, Plans & Partnerships

9.1 **Council's Key Priorities**: The following Key Priorities are engaged:

- Effective Council

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

9.3 **Climate & Environmental Impact of recommendations**: None for the purposes of this report.

9.4 **Sustainability Policy & Community Safety Implications**: None for the purposes of this report.

9.5 **Partnerships**: None for the purposes of this report.

9.6 **Local Government Reorganisation Implications**: The changes to the Constitution for Epsom & Ewell will only apply until 31 March 2027. East Surrey will need to adopt its own Constitution in line with the National Scheme of Delegation. Officers will be liaising with other East Surrey boroughs to establish what changes they are proposing to their Constitutions to ensure consistency. The Planning Advisory Service have also indicated that they are working with MHCLG to draft template wording for Councils to include in their Constitution relating to the regulations.

10 Background papers

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

Previous reports:

- None

Other papers:

- None

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3. Planning Scheme of Delegation

3.1. The terms of reference of the Planning Committee include responsibility to determine the level of delegation to officers. It is important that there is clarity as to which decisions officers can determine and which the Planning Committee must determine.

No	Title of Post Holder	Function Delegated	Date
P1	Head of Planning Policy and Economic Development and Head of Development Management and Planning Enforcement, Planning Policy Manager, Planning Team Leader	Determination of all matters arising from all legislation relating to the use and development of land, subject to the requirements of Town and Country Planning (Discharge of Local Planning Authority Functions) (England) Regulations 2026 ("the Planning Regulations 2026"). Should any of these officers think it necessary or appropriate, they may at their discretion, refer any matter for consideration and / or determination by the Planning Committee, and shall inform the Chair of Planning Committee accordingly.	12 December 2023 **FC** 1 April 2025 **MO** 6 May 2025 **FC** 11 Aug 2025 **MO**
P2	Chief Executive, Directors, Heads of Service	To authorise, in writing, Officers to enter on to land or to apply for a warrant and thereafter enter land pursuant to sections 196A-196C and 214B-214D of the Town and Country Planning Act 1990 as amended	12 December 2023 **FC**
P3	Head of Planning Policy and Economic Development and Head of Development Management and Planning Enforcement	Agree the terms of, and variations to, Section 106 agreements under the Town and Country Planning Act 1990 in connection with the grant of planning permission granted under appeal.	12 December 2023 **FC** 11 Aug 2025 **MO**
P4	Head of Planning Policy and Economic Development and Head of Development Management and Planning Enforcement	To refuse to enter into a Section 106 agreement if the same has not been completed within 6 months of the Planning Committee having granted planning permission, subject to a Section 106 agreement, without the need to return the matter to the Planning Committee.	12 December 2023 **FC** 11 Aug 2025 **MO**

Deleted: A Planning Committee member or ward councillor may call in a matter for determination by the Planning Committee in accordance with the procedure outlined in the Framework (Annex 4.8, Section 8).¶
¶
The request to "call-in" an application must be on relevant planning grounds and merit intervention to have the application placed before the Planning Committee. Where the "call in" is not made on material planning grounds the "call-in" will be invalid. The decision as to whether the grounds are justifiable will be at the discretion of the Head of Development Management and Planning Enforcement in consultation with the Chair of Planning Committee and the councillors concerned.¶

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P5	Head of Planning Policy and Economic Development and Head of Development Management and Planning Enforcement, Planning Policy Manager, Planning Team Leader, Principal Planning Officer	Determination of all 'non-major and other' matters arising from all legislation relating to the use and development of land. The definition of 'non-major' and other' applications, shall include the following specific matters as defined within Regulation 3 of the Town and Country Planning (Section 62A Applications) (Amendment) Regulations 2016 – (a) applications for planning permission for the development of land in England which is non-major development other than excluded applications; (b)applications for approval of a matter that, as defined by section 92 of the 1990 Act, is a reserved matter in the case of an outline planning permission for the development of land in England which is non-major development. The definition of 'other' applications, shall include - tree works applications, determining compliance with conditions to existing permissions. Should any of these officers think it necessary or appropriate, they may at their discretion, refer any such matter for consideration and / or determination by the Planning Committee, and shall inform the Chair of Planning Committee accordingly, subject to the requirements of Town and Country Planning (Discharge of Local Planning Authority Functions) (England) Regulations 2026 ("the Planning Regulations 2026").	6 May 2025 **FC** 11 Aug 2025 **MO**
P6	Head of Planning Policy and Economic Development in consultation	To invite the examining Inspector(s) to recommend any modifications they consider to be necessary in accordance with section	26 August 2025 **UD**

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	with the Chair of Licensing and Planning Policy Committee once the Local Plan 2022- 2040 has been submitted for examination	20(7C) of the Planning and Compulsory Purchase Act 2004	
P7	Head of Planning Policy and Economic Development in consultation with the Chair of Licensing and Planning Policy Committee	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.	26 August 2025 **UD**
P8	Head of Development Management and Planning Enforcement, Head of Planning Policy and Economic Development, Planning Team Leader	Closure of planning enforcement cases, subject to officers reporting closed enforcement cases to Planning Committee as normal.	10 February 2026 **FC**
P9	Head of Development Management and Planning Enforcement, Head of Planning Policy and Economic Development, Planning Team Leader	Determination of tree works applications where there is a financial or public interest in doing so, unless there is a significant financial implication for the Council	10 February 2026 **FC**
P10	Head of Development Management and Planning Enforcement, Head of Planning Policy and Economic Development, Planning Team Leader	Service of dangerous tree notices for trees affected by Ash dieback **Relevant legislation: s.23 Local Government (Miscellaneous Provisions) Act 1976**	10 February 2026 **FC**
P11	Head of Development Management and	Role of Nominated Officer, as defined under the Planning Regulations 2026.	

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	Planning Enforcement		
P12	Head of Planning Policy and Economic Development, Planning Team Leader	To deputise for the Nominated Officer, as defined under the Planning Regulations 2026, in the Nominated Officer's absence.	
P13	Head of Planning Policy and Economic Development, Head of Development Management and Planning Enforcement, Planning Team Leader, Principal Planning Officer, Planning Officer	Determination of Schedule 1 applications, as defined under the Planning Regulations 2026.	
P14	Head of Planning Policy and Economic Development, Head of Development Management and Planning Enforcement, Planning Team Leader, Principal Planning Officer, Planning Officer	Determination of a Schedule 2 application, as defined under the Planning Regulations 2026, where such application has been delegated to Officers for determination.	
P15	Head of Planning Policy and Economic Development, Head of Development Management and Planning Enforcement, Planning Team Leader, Principal Planning Officer, Planning Officer	Determination of applications that do not fall under Schedules 1 or 2 of the Planning Regulations 2026	
P16	Head of Development	Having first consulted with the	

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	Management and Planning Enforcement	Nominated Member, determine and put in place appropriate triaging arrangements in relation to 'Schedule 2' and 'Own-Interest' planning applications	

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Planning Committee	10 members

Full Council will appoint a Planning Committee, which will be responsible for dealing with planning applications and related matters.

Terms of reference:

1. To be responsible for exercising functions under the Town and Country Planning legislation (being those functions contained in Schedule 2 to the Town and Country Planning (Discharge of Local Planning Authority Functions) (England) Regulations 2026 ("the 2026 Regulations") and as are referred to it by the Council's Nominated Member and Nominated Officer,
2. Such other functions relating to town and country planning and development control in so far as they are the responsibility of the Borough Council as specified in Section A of Schedule 1 to the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended) and where they do not conflict with functions delegated to officers either by way of the 2026 Regulations or as otherwise delegated to them and set out in Appendix 2.1 to the Council's Constitution.
3. To receive and review the summary of enforcement action taken in response to breaches of control on a quarterly basis.
4. To receive and review summaries of planning appeals on a quarterly basis or when appeals have been received as appropriate.
5. To receive and review the summary of Planning performance on a quarterly basis.
6. To receive and review on a quarterly basis the record of cases the Nominated Officer and Nominated Member have considered for referral to committee, including the outcome and reasons for referral.

To make recommendations regarding:

7. Changes to the committee's terms of reference.
8. Other matters under the committee's jurisdiction which, by virtue of statutory provision, must be determined by Full Council.

To resolve:

9. Determination of those Schedule 2 Applications, as defined under the Town and Country Planning (Discharge of Local Planning Authority Functions) (England) Regulations 2026, referred to Planning Committee by the agreement of both the Nominated Officer and Nominated Member.
10. Guidelines under which the committee shall determine its level of involvement in

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Deleted: specifically the determination of planning and related applications involving:

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permission for development which require to be advertised as a departure from development plan, as a whole, but which are recommended for approval; ¶
listed building consent that are submitted by or on behalf of any Member of the Council (or their spouse or partner) or any Council employee that is a member of Corporate Leadership Team (or their spouse or partner).¶
Council itself (i.e. applications where the Council are the applicant)¶
Applications called-in for determination by the Planning Committee by a Member in accordance with Annex 4-8, paragraphs 8.4 and 8.8, where the call-in request has not been withdrawn prior to publication of the agenda.¶

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individual planning, building and enforcement decisions.

11. Confirmation (or modification) of Tree Preservation Orders where there are unresolved objections.

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Annex 4.8 - Model Code of Practice in respect of Planning Matters: Probity in Planning

1. Introduction

1.1. Planning matters have a significant impact on our lives and the area in which we live. It is important that the system operates and is seen to operate, in an honest, open and transparent manner.

1.2. The purpose of the planning system is to consider development proposals in the light of wider public interests, with the Government requiring a positive approach to be taken towards allowing substantial development. To succeed, the planning system relies on councillors and officers acting in a way that is fair and is clearly seen to be fair. This includes acting in accordance with planning law in all instances and having due regard to national and local policies, in addition to all other "material planning considerations." It is worth noting that a large proportion of judicial challenges to local authorities, as well as complaints to the Ombudsman, are as a result of planning matters.

1.3. This model code of good practice for planning ("Code") has been adapted from national guidelines on probity, to take account of the local situation. Two particular areas of the Localism Act 2011 are relevant to this code. Firstly, regarding pre-determination the Act makes clear that it is proper for councillors to play an active part in local discussions and that they should not be liable to legal challenge as a result, provided they maintain an open mind if they are involved in decision making about the matter. Secondly, and related to pre-determination, the Act introduced a requirement for developers to consult local communities before submitting planning applications for certain developments. This gives councillors and local residents a chance to comment when there is still genuine scope to make changes to proposals, at both pre-application and post submission stages.

2. Status of the Code

2.1. This Code is contained in the council's Constitution and is complementary to the Members' Code of Conduct (Constitution, Appendix 1). Members of the Planning Committee ("Members") should apply both the general Councillors' Code of Conduct and this Code in dealing with planning issues. This is to help Members: maintain the council's high standards of conduct, avoid placing the council at risk of legal challenge or a finding of maladministration by the Local Government and Social Care Ombudsman, and avoid putting an individual Planning Committee member at risk of a complaint. A breach of this Code, whilst not usually amounting to a breach of criminal law, may

adversely affect the reputation of the Council. For the avoidance of doubt, references to Members in this Code includes substitutes.

2.2. The purpose of this Code of practice is to:

i. Set the standards of conduct the council requires Members and officers of the council to follow when dealing with and determining planning applications including policy, development and enforcement.

ii. Guide the way in which Members and officers of the council deal with all planning decisions, supporting their respective roles, and protecting their reputation for probity

iii. Set the standard of conduct which other parties to the process can expect from Members and officers when dealing with planning matters

2.3. This Code applies to all Members and officers when making decisions on planning matters. It has been drawn up to:

i. Support Members effective engagement in all aspects of the planning process and, in this context, to fulfil their democratic role.

ii. Ensure transparency and fairness in the way in which decisions are taken and that there are no grounds for suggesting that a decision has in any way been biased, partial or not made on the correct considerations.

2.4. A key objective of this Code is to help Members make formal planning decisions that should be safe from legal challenge, and comply with the National Scheme of Delegation for Planning.

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2.5. This Code sets out clear lines of engagement and expectations for each of the parties involved including members of the public and developers.

3. General Role and Conduct of Members of the Planning Committee and Officers

3.1. Members and officers have different but complementary roles in the planning process. Members of the Planning Committee have different roles to those of other councillors.

3.2. Mutual trust, respect and understanding between councillors and officers are key to achieving effective local government. Annex 2.4 of the Council Operating Framework provides additional information on councillor / officer relations. Officers' views, opinions and recommendations will be presented based on their overriding obligation of professional independence, which

may on occasion be at odds with the views, opinions or decisions of the Planning Committee.

3.3. Officers, in their role of advising and assisting Members in their determination of planning matters in the public interest, do not represent either the landowner / applicant or the objector. They will:

i. Provide impartial professional advice.

ii. Seek to ensure consistency of interpretation of national, regional and the council's planning policies.

iii. Complete written reports with clear written recommendations and all necessary information for the decision to be made.

3.4. The code of conduct for officers is set out in their employment policies. In addition, many professional staff within the planning service will be members of the Royal Town Planning Institute (RTPI) and are required to comply with the RTPI Code for professional conduct. Planning officers who are not RTPI members are also expected to conduct themselves in the same manner.

3.5. Members of the Planning Committee and all other councillors must not put pressure on officers to put forward a particular recommendation or deal with a planning matter in a particular way. This includes not engaging in lobbying the Nominated Member or the Nominated Officer; this does not prevent a councillor from asking questions of, or submitting preliminary views, to an officer. These views if submitted in written form will be placed on the planning file and considered together with other material planning considerations. If councillors have factual questions about a forthcoming application, they should ask those questions in advance of the meeting so that the situation can be clarified.

3.6. Members should make all decisions in an open and transparent manner in accordance with material planning considerations and this should not be compromised in any way. Messages should not be passed to Members during debate and Members should not use their mobile phones during a meeting, as this could give an impression of undue influence from a third party. In an emergency at a meeting any communication should go through the Democratic Services officer. During a Planning Committee meeting a Member should not leave the chamber to discuss the item on the agenda with anyone else whether inside the Chamber or outside. For the avoidance of doubt, this includes the applicant or their representatives, an objector or someone in the public gallery.

3.7. In order to ensure that decisions are taken on planning grounds and are legally sound, it is **imperative** that all Members of the Planning Committee read the reports prepared by officers and familiarise themselves with all

relevant National Planning Guidance (including the National Planning Policy Framework), Development Plan policies, and other material planning considerations, well in advance of the relevant Planning Committee meeting. It is important that Members be **seen** to be meeting this provision of the Code.

3.8. Members of the Planning Committee must always approach their decision making with an **open mind**, have regard to **all** material planning considerations, and be prepared to change their views if persuaded that they should. Members should remember that planning law requires determinations to be based on **planning considerations** and not on any political or other reasons.

3.9. The Planning Committee should, when considering an application, take into account **all views on material planning considerations** that are expressed in such a way that they are **openly heard** and **fairly** considered in a **balanced** way before the Committee reach a decision. This does not mean that the same points need to be repeated if they are raised by more than one party.

3.10. Members **cannot vote** or take part in the meeting's discussion on an item unless they have been present to hear the entire debate, including the officer's introduction to the item.

3.11. Members should ensure that if they are proposing, seconding or supporting a decision contrary to an officer's recommendations or the development plan, they, not officers, clearly **identify** and understand the planning reasons leading to this decision. Their reason/s must be given **prior** to the vote and will be recorded. Members must be aware that the resulting decision may have to be justified by evidence about their reasoning at a planning appeal in the event of challenge, and members may be called upon to provide this evidence themselves.

3.12. A significant number of planning applications are delegated to officers further to the Town and Country Planning (Discharge of Local Planning Authority Functions) (England) Regulations 2026. A planning application will only be considered by the Planning Committee if the Nominated Member and the Nominated Officer agree that it should. The Nominated Member or the Nominated Officer (or any other officer with delegated powers) should not be lobbied or otherwise contacted by any person or organization (including by members of the Planning Committee, other elected members or council officers), to persuade them to use their power in a particular way. The Nominated Member should not be lobbied by other members of their political group. If the Nominated Member or the Nominated Officer (or any other officer with delegated powers) are subject to such lobbying, or any other

member or officer is aware that such lobbying is taking place, it must be reported to the Monitoring Officer.

4. Interests: Registration and Disclosure

4.1. The law and the Members' Code of Conduct (Constitution, Appendix 1) set out rules and guidance on declaration of interests. Councillors **must** follow these rules and guidance and review their own situation regularly. These are set out in the Code of Conduct and so are not repeated here.

4.2. A Member of the Planning Committee with a disclosable pecuniary interest relating to an item of business will not be able to take part in the debate or vote on that item. A councillor with a disclosable pecuniary interest may be permitted to address the Committee in a private capacity if registered to speak at the meeting. The councillor must then leave the Chamber and must not participate further in the debate or participate in any vote or further vote on that matter.

4.3. In relation to planning decisions, any interest that does not amount to a disclosable pecuniary interest, but which may have a significant impact upon a Member's judgement, should be declared by the Member at the meeting. In each case, this would be a matter for the Member's **own** judgement having full regard to the facts. Advice on this can be sought in advance from the Monitoring Officer.

4.4. Even if a Member considers a non-pecuniary interest would not have a significant impact on their judgement, there are likely to be situations where the public expectation would be for the Member not to participate; and Members should consider whether the perception of such an interest would mean it is better for them not to participate. Advice may be sought in advance from the Monitoring Officer.

4.5. There may be circumstances in which a member of the public would not regard it necessary for a Member to declare an interest or involvement in a matter but for reasons of good practice and transparency, a Member chooses to do so, simply to be as open as possible. In these circumstances, the declaration would have no impact on the Member's participation.

4.6. Members who are unsure whether an interest should be declared should seek advice and guidance from the Monitoring Officer or Deputy Monitoring Officer.

5. Predetermination, Predisposition and Bias

5.1. Members of the Planning Committee must ensure that they do not restrict their ability to take part in the decision-making process by making up their minds or clearly giving any appearance that an application or other matter referred to the Planning Committee has already been decided by them

before the Planning Committee has the opportunity to consider the application.

5.2. The courts have sought to distinguish between situations that involve bias, **predetermination** (which is a form of bias), on the one hand and **predisposition** on the other.

5.3. **Predetermination** is indicative of a **"closed mind"** approach and could leave the committee's decision open to challenge by Judicial Review. Such "pre-determination" has been held to amount to the "surrender by the decision-maker of its judgement by having a closed mind and failing to apply it to the task" (***R (on application Persimmon Homes) v Vale of Glamorgan Council [2010] EWHC 535***).

5.4. Members of the Planning Committee can and indeed may well have a **predisposition** to a view about a matter but **must make it clear** that despite this they have an **open mind,** one which is capable of being swayed and that they are willing to listen to **all material considerations** presented before them at the decision-making meeting before deciding on how to vote.

5.5. Members and officers should also avoid the **appearance of bias**. An example of this type of interest might be in relation to a planning application on a site very near to the Member's home (where it may well be advisable for the Member not to take part); or an application by a family member or close friend or business acquaintance. It may also arise where a Member is closely involved with an organisation which may have an interest in the application.

5.6. In relation to planning decisions, any interest which may have a significant impact upon a Member's judgement, should be declared by the Member at the meeting. In each case, whilst this would be a matter for the Member's **own** judgement having full regard to the facts, the decision they make should be a reasonable one, as the courts will consider apparent, as well as actual bias.

5.7. Whilst it might remain possible for a Member to apply an open mind to the matter to be determined, in such circumstances Members must avoid giving the impression or appearance that particular personal interests or attributes would lead them to consider aspects of an application more carefully, or with more regard than other aspects, unaffected by their own character and experience. It should be understood that the perception of justice "is rooted in confidence, and that confidence is destroyed when right minded people go away thinking that the judge was biased".[1]

[1] Metropolitan Properties Co (FGC) Ltd v Lannon [1969] 1 QB 577.

5.8. Members who are unsure on their position on predetermination should seek advice from the Monitoring Officer or Deputy Monitoring Officer before the Planning Meeting.

5.9. A Member who has **predetermined** their position or who has a biased or apparently biased situation should **withdraw** from being part of the decision-making body. If the Member takes part in the decision-making process it will put the council at risk of a finding of maladministration and of legal proceedings.

5.10. For Planning Committee Members the aim is that they not only act, but are seen to act, impartially and honestly by approaching each planning decision fairly between the parties and with an open mind. Should a Member wish to take a particular stance in relation to a development or feel that it would be difficult to demonstrate that they have followed a consistently fair approach between all parties in a case, then it is possible for them to decide not to be part of the decision-making process on the particular issue or application but to act as a ward member in that instance. However, in such cases they need to clearly identify that they are leaving the membership of the committee for the item and do not seek to participate in the debate as they would normally do as a committee member.

5.11. Members can attend meetings to discuss proposed development schemes and questions have been asked about the propriety of such attendance. This is different from lobbying (see below). Members and the Council could be challenged where they have expressed their opinion on proposals during or after such meetings, or in advance of Committee consideration. At the start of any such meetings and throughout, the Member of the Planning Committee should make it clear that the discussion will not bind the Council or councillor and that any view expressed is personal and provisional.

5.12. The administrative system by which planning applications are determined in accordance with the law, and as necessary in a democratic society, would be brought into disrepute if it became evident that decisions favourable to an applicant or an objector could be obtained by lobbying members outside the procedural framework (see Section 6 for lobbying). For these reasons, if an applicant or an objector seeks a meeting with members it is strongly advisable for the member to insist that they will only attend if an officer or others are present, this also includes any pre-application discussion. For the avoidance of doubt this includes whether the meeting is taking place in person or virtual.

5.13. However, it can be practically impossible for members to always avoid informal approaches in their ward and members may be said to have a duty, particularly as Ward Councillors, to inform themselves of proposals that affect their wards and to be alive to public opinion. Councillors can play a

constructive role in listening to and objectively gathering and reporting such views to the Members who will determine the application, even though Members will be aware that the views expressed by the public may not be based on material planning considerations.

5.14. With these points in mind, it is suggested that the following guidelines may be helpful to members when considering whether to accept an invitation to a meeting:

i. Where members accept invitations to meetings from prospective developers or objectors when an application for planning permission has been received, even if the invitation is made to them ostensibly as a Ward Councillor, they should ensure that an officer or others are present and avoid expressing any fixed view on the matter.

ii. Councillors must not make any commitment to determine a matter in a particular way, for any reason.

iii. Members and Ward Councillors (subject to the two paragraphs above) should not accept invitations to meetings from prospective developers or objectors unless it is clear to them that the meeting is either a public meeting or one to which residents or other persons with an interest in the potential development have also been invited. If a Ward Councillor attends such a meeting in the belief that others have been invited but finds that no other persons are present, apart from the developer, they should decline to take part in any discussion of the scheme. There is no reason to distinguish between meetings in neutral premises and meetings in the prospective developer's or objector's own premises.

iv. There is nothing to stop members inspecting a site from the public highway if they choose to do so in order to better acquaint themselves with the details, but Members should be aware of the risk of contact with the applicant or objector and inferences, which might be made. If access to a site is required, a formal site visit should be sought through the planning Case Officer.

v. There is nothing to stop Members responding to invitations to a meeting if properly convened through the Chief Executive or by officers in the planning service to which all relevant Members (but not members of the public) have been invited, provided that if the merits and problems of the application are discussed Members make it clear that they have no fixed view of the matter at that stage.

6. Lobbying

6.1. Lobbying is a normal part of the planning process and may not be restricted to Members of the Planning Committee.

6.2. Members of the Planning Committee (including substitutes) should be aware that if they are a member of a lobbying group, they may need to recuse themselves from participation in decision making on an application where that application has been discussed by the lobby group in their presence. They should also consider recusing themselves from meetings of the lobby group whilst a planning application is to be discussed.

6.3. Since lobbying can lead to the impartiality and integrity of a Member being called into question, it is clear that care should be taken, and all parties involved should exercise common sense. It is therefore important that Members protect their impartiality and integrity in planning matters. Members will not breach this Code by listening to or receiving viewpoints from residents or other interested parties as long as they make it clear that they are keeping an open mind.

7. The Decision-Making Process and Decisions Contrary to Officer Recommendations and / or the Local Plan

7.1. All Committee decisions are made by a simple majority with the Chair's casting vote in case of a tied vote.

7.2. In discussing, and determining a planning application or other planning matter, Members should confine their discussion to the policies of the Development Plan, and to those material considerations that should influence their decision.

7.3. However, it is acknowledged that deputations by applicants or members of the public may refer to matters that should not properly be part of the reasoning of the Members' decision. On such occasions, it may be difficult for Members of the Planning Committee to confine their comments to the appropriate planning issues without appearing to disregard expressed concerns.

7.4. Where it appears that the clarity of the decision-making process may be undermined, the Committee Chair and officers may give guidance on any elements of the discussions that refer to irrelevant or immaterial considerations, and any elements that should be disregarded by the Committee in formulating its decision. Officers will clarify the weight to be given to relevant consideration in their reports, or advise on information that comes forward during deputations or in the course of debate. It is very important that Members are aware that if decisions are not made with due regard to the proper consideration they can be challenged.

7.5. Where the Planning Committee's decisions do not accord with the officer's recommendation, the Committee's reasons to grant an application, or to refuse it, or any additional conditions to be applied, must be clearly stated by the Member(s) making the proposal.

7.6. Where members are minded to make a decision that is contrary to officers' recommendations it is important to ensure as far as possible that any decision made will be capable of surviving a legal challenge. Members should be clear on their reasons for refusal, however they can ask officers present in the meeting to help refine their reasons. When the Committee has made such a decision, the Chair will allow brief discussion to ensure that officers have understood the intentions and reasons of the Committee.

7.7. All conditions, including ones that the Committee may wish to impose on a planning permission, must be necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.

7.8. If the report of the Head of Planning Policy and Economic Development or Head of Development Management and Planning Enforcement recommends approval of a departure from the Local Plan, the full justification for that recommended departure will be included in the report.

8. Planning Applications made by Councillors and Officers

8.1. When a planning application is submitted by a councillor or member of the Corporate Management Team, or by a close relative or friend of them they will:

i. Advise the Monitoring Officer of the application.

ii. Take no part in the processing and determination of the application.

8.2. In accordance with the Town and Country Planning (Discharge of Functions) (England) Regulations 2026, the Nominated Member and the Nominated Officer will review and seek to agree when an 'Own Interest' application (as defined in the 2026 Regulations) will be referred to the Planning Committee for determination or whether it will be determined under delegated powers.

8.3. The Corporate Management Team means the Chief Executive, Directors, and Heads of Service.

9. Late Representations

9.1. Late representations by the applicant or objectors regarding applications being presented to Committee will be considered up until midday three working days before the Planning Committee meeting. Such representations will be summarised by the Case Officer and sent to the Planning Committee Members at least one working day before the meeting.

Deleted: <#>Councillor "Planning Application Call-in" Procedure¶
Most planning applications are determined by Planning Officers in line with the council's Scheme of Delegation (

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Deleted: <#>, Appendix 2). However even when delegated authority authorises officers to determine the application, a Planning Committee Member, or any councillor, may wish for a planning application to be considered by the Planning Committee. In these circumstances, the following rules must be complied with. Failure to do so entitles officers to refuse to put the application to committee and determine it under delegated authority.¶
received within **28 calendar** days following the date of public notification by the Development Management team. This gives the councillors enough time to read the comments being received from other parties (who have 21 days to comment).¶
The request must be in writing (email is acceptable) to the Case Officer, copied to the Head of Development Management and Planning Enforcement and the Chair of Planning Committee, asking that the item be "called-in" to the Planning Committee, ¶
planning grounds or **merit** intervention to have the application placed before the Planning Committee.¶
It is not the case that just because a member of the public requests call-in of an application on their behalf, that this should be actioned. It is the responsibility of councillors to explain to their electorate that a call-in cannot be justified if there are no planning grounds for doing so.¶
All "call-ins" made by councillors stating **material planning grounds** and within **28 calendar days** will be valid.¶
planning or merit intervention grounds, the "call-in" will be rejected. The decision as to whether the grounds are justifiable will be at the discretion of the Head of Development Management and Planning Enforcement, in consultation with the Chair of Planning Committee and the councillor(s) concerned. ¶
Councillors who have asked for a call-in should ensure that they attend the committee meeting to which the item is being discussed to explain the planning reasons why the application merits consideration by the Planning Committee. However, if they do not attend this will not prevent the item from being dealt with.¶

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9.2. Comments or any other information received after the deadline will only be taken into consideration in exceptional circumstances at the discretion of the Head of Development Management and Planning Enforcement, in consultation with the Chair of Planning Committee. This process ensures the Planning Committee Members have sufficient time to read any additional papers.

9.3. No material will be handed out at Committee by anyone other than the officers presenting the item before committee.

10. Public Speaking at Planning Committee

10.1. Any Ward members, members of the public or organisations are entitled to speak at the Planning Committee, subject to the conditions below.

Deleted: , Call-in Members

10.2. An individual or representative of a local group / organisation who wishes to speak at a Planning Committee must register their wish to do so by noon on the day of the meeting. Details on how registration can be made are provided on the introduction to a meeting's agenda papers.

10.3. Normally, only two speakers in support (including the applicant/agent) and two against may speak on a single application. Registration will normally be on a first come first served basis, but an individual may choose to waive this right in favour of an individual who attempted to register at a later time. Alternatively, several members of the public may appoint one person to speak on their behalf provided they can reach agreement to this amongst themselves.

10.4. A speaker shall have a maximum of three minutes to address the Committee and must confine their remarks to the application upon which they requested to speak. The address shall be in the form of a statement, not attempts to question the applicant or other persons, but may address issues raised by other speakers.

10.5. Speakers should only raise issues concerning planning matters such as:

i. Appearance and character of the application
ii. Traffic issues, highway safety and parking
iii. Layout and density of buildings
iv. Loss of light overshadowing and loss of privacy
v. Noise, disturbance and other loss of privacy
vi. Other relevant planning considerations

10.6. There will be no opportunity for displaying any materials or to ask any questions of anyone at the meeting, unless with the express approval of the Chair of the Committee and submitted in advance.

10.7. If the Chair considers that any remarks made are defamatory, no further representation will be allowed.

10.8. Once a speaker has finished they will take no further part in the meeting.

10.9. Individuals or organisations will be invited to address the Committee following the presentation of the item by the officer. The order of speakers will be:

i. Ward councillors

ii. Objectors

iii. Supporters (including the applicant or their agent

Deleted: <#>Any councillor who has called in an application ¶

11. Monitoring and Review of Decisions

11.1. Planning Committee Members should play an active part in regularly reviewing the outcome of planning decisions so that lessons can be learned, and the future consideration and determination of planning applications can be improved as part of a broader commitment to continuous improvement.

11.2. Arrangements will be made for Members to visit a sample of implemented planning permissions, so that a regular review of the quality of planning decisions can be undertaken.

11.3. The outcome of the review will be considered by the Planning Committee and may lead to the possible amendments to existing policies or practices

12. Training

12.1. No Member (or Member substituting on a Planning Committee) may sit on a Planning Committee meeting without first having received appropriate mandatory training as set out below.

12.2. The validity of this training will expire if the Member has not attended a meeting of the Planning Committee within 12 months of receiving it, or has had a gap in membership from the Committee of more than 6 months. Where the validity of the training has expired, the Member may not sit on the Planning Committee until they have received further training.

12.3. Given the complex legislative framework for determining planning applications and the constant reforms and changes within the planning system, the Head of Planning Policy and Economic Development and Head of Development Management and Planning Enforcement will provide a Planning Committee Training Programme to include:

i. An annual training session that will provide an overview of the key role of planning and the role councillors play in the planning process. This training will usually be held once the membership of the Planning Committee has been confirmed at Annual Council and should be attended by both new and continuing Members of the Committee. However, all councillors will be encouraged to attend, to help them understand planning issues and enable them to act as substitutes on the Planning Committee.

ii. A six month mandatory refresher session.

iii. Further training sessions as necessary on new council and Government policy and legislation, or other planning issues that are requested by councillors or officers. Again, all members of the council will be encouraged to attend such sessions.

12.4. Democratic Services will maintain a register of councillors who have received training.

13. Complaints

13.1. A complaint that a Member or officer has breached this Code should be made in writing to the Monitoring Officer for investigation and determination.

13.2. There is a specific right of appeal for applicants who are not satisfied with a planning decision. In all other cases, the Head of Development Management and Planning Enforcement will investigate a complaint made in writing regarding the determination of a planning application, or a related planning matter, and will deal with it in accordance with the council's complaints procedure.

13.3. In the event that the complainant was not satisfied with the result of the investigation under the council's complaints procedure, must be made directly to the Local Government and Social Care Ombudsman.

14. Site Visits

14.1. The purpose of an organised council site visit is for members to gain knowledge of the development proposal, the application site and its relationship to adjacent sites. Members and officers must remember when conducting a site visit that anything said or done by them should be restricted to relevant planning considerations and that they should remain open minded.

14.2. The decision to hold a site visit prior to the Committee meeting is to be made by the Head of Development Management and Planning Enforcement in consultation with Chair of Planning Committee. The purposes of a formal site visit are:

i. To view the setting of the application.

ii. To consider any other matters seen on site which may be material to consideration of the application.

iii. To find facts, especially when the application site is not visible from public land.

14.3. Site visits should be requested by members prior to the application being reported to Committee. Members should only request a site visit when the application has reached the determination stage and if they consider it essential to clarify an issue that cannot be understood without such a visit, and which could not have been considered earlier. The Committee may decide to visit a site because particular factors to be seen on site are significant in terms of the weight to be afforded to them in determining the application, and because following discussion in Committee, Members have reduced confidence that such factors can be fairly considered in the absence of a site visit to assess such details. In proposing a site visit, the Member who wishes the Committee to have additional opportunity to do so, should specify the factors to be noted if the site visit is agreed.

14.4. During a site visit members and officers should avoid any appearance of impropriety and must not accept gifts or hospitality. Comments should be restricted to planning matters, and questions should be put through the planning officers attending the site visit. Officers and members must refrain from making comments that might be construed as supporting or opposing a particular view, and from making any personal comments.

14.5. The purpose of a formal site visit is not to receive or allow representations to be made outside the formal Committee meeting. Site visits should not be used as a lobbying opportunity by objectors or supporters. If, on a site visit, members and officers are approached by persons wishing to speak about the application, officers will explain that any representations may be made to the Committee at the meeting and explain the processes for making representations.

14.6. Members with a pecuniary interest in a planning application should not make representations seeking a site visit in respect of an application. Members with a pecuniary interest in a particular application or agenda item must not attend any related site visit.

14.7. Members with a personal interest that a fair-minded observer and informed observer may conclude amounts to a real danger of bias on an agenda item or particular application must also not attend any related site visit.

14.8. Other councillors can attend a site visit at the discretion of the Chair of Planning Committee. However it is at the discretion of the land owner as to whether they are allowed on private land.

14.9. If a member intends to visit a site, outside of the formal site visit arrangements they should avoid entering private land and avoid discussions with any land owner or member of the public.

15. Development Proposed by the Council

15.1. Parliament has decided that local planning authorities are, in the majority of circumstances, the appropriate body for determining planning applications affecting the area, including where the council itself submits a planning application. There are separate statutory requirements for the council in determining applications to develop its own land, or to develop it jointly with another body.

15.2. Members and officers involved in reaching a determination of the application should treat proposals for the council's own development, or development involving the council and another party, in the same way as those by private developers. Subject to the Town and Country Planning (Discharge of Functions) (England) Regulations 2026, this means that not all applications on council owned land need to be considered by Committee; for example, where an application relates to council owned land that is subject to a long leasehold.

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15.3. Planning decisions must always be made strictly on planning merits, and without regard to any financial or other gain that may accrue to the council if the development is permitted. It is important that the council be seen to be treating such applications on an equal footing with all other applications, as well as actually doing so.

16. Review of Protocol

16.1. This Code will be reviewed as necessary, for instance with changes to planning legislation, national codes of conduct, and so forth.

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APPENDIX 4

The Town and Country Planning (Discharge of Local Planning Authority Functions) (England) Regulations 2026

Schedule 1

Regulation 4

Applications that must be determined by an officer

1. An application made under section 17(1) of the Land Compensation Act 1961 (certificates of appropriate alternative development).

2. An application made under section 26H(1) of the Listed Buildings Act (certificate of lawfulness of proposed works).

3. A householder application.

4. A minor commercial application.

5. A minor residential application.

6. An application for permission in principle.

7. (1) An application made under section 73(1) of TCPA 1990 (application to develop land without compliance with conditions previously attached) in respect of which the original planning permission was a Schedule 1 planning permission.

(2) In this paragraph

"original planning permission" means a planning permission which is the first in a sequence of two or more planning permissions, where the second and any subsequent planning permissions were granted under section 73(1) of TCPA 1990;

"Schedule 1 planning permission" means a planning permission granted pursuant to an application which is of a kind specified in this Schedule.

8. An application made under section 96A(4) of TCPA 1990 (non-material changes to planning permission or permission in principle).

9. (1) In respect of a planning obligation that the authority concerned considers is connected with a Schedule 1 approval

(a) a request to agree to modify or discharge that obligation under section 106A(1)(a) of TCPA 1990 (modification and discharge of planning obligations);

(b) an application to modify or discharge that obligation under section 106A(3) of TCPA 1990 (modification and discharge of planning obligations).

(2) In this paragraph, "Schedule 1 approval" means any permission, agreement, consent or approval (other than a planning obligation) pursuant to an application which is of a kind specified in this Schedule.

10. An application made under section 191(1) of TCPA 1990 (certificate of lawfulness of existing use or development).

11. An application made under section 192(1) of TCPA 1990 (certificate of lawfulness of proposed use or development).

12. The submission of a biodiversity gain plan under paragraph 13(2)(a) of Schedule 7A to TCPA 1990.

13. A reserved matters approval application in respect of an outline planning permission other than a large outline permission.

14. An application made under article 27 (1) of DMPO (applications made under a planning condition).

15. An application pursuant to provision in Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 for

(a) prior approval, or

(b) a determination as to whether prior approval is required.

Schedule 2

Regulation 5

Applications that may be determined by a committee or by an officer

1. An application for listed building consent made under section 10(1) of the Listed Buildings Act (making of applications for listed building consent).

2. An application made under section 19(1) of the Listed Buildings Act (variation or discharge of conditions of listed building consent).

3. An application for planning permission that the authority concerned considers is connected with an application of a kind specified in paragraph 1 or 2.

4. An application for planning permission that is not

(a) a householder application,

(b) a minor commercial application, or

(c) a minor residential application.

5. (1) An application made under section 73(1) of TCPA 1990 (application to develop land without compliance with conditions previously attached) in respect of which the original planning permission was a Schedule 2 planning permission.

(2) In this paragraph

"original planning permission" means a planning permission which is the first in a sequence of two or more planning permissions, where the second and any subsequent planning permissions were granted under section 73(1) of TCPA 1990;

"Schedule 2 planning permission" means a planning permission granted pursuant to an application which is of a kind specified in this Schedule.

6. An application made under section 73A(1) of TCPA 1990 (planning permission for development already carried out).

7. (1) In respect of a planning obligation that the authority concerned considers is connected with a Schedule 2 approval—

(a) a request to agree to modify or discharge that obligation under section 106A(1)(a) of TCPA 1990 (modification and discharge of planning obligations);

(b) an application to modify or discharge that obligation under section 106A(3) of TCPA 1990 (modification and discharge of planning obligations).

(2) In this paragraph, "Schedule 2 approval" means any permission, agreement, consent or approval (other than a planning obligation) pursuant to an application which is of a kind specified in this Schedule.

8. A reserved matters approval application in respect of a large outline permission.

9. An application made under regulation 9 (1) of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (application for express consent to display advertisement).

10. An application made under regulation 16 (1) of the Town and Country Planning (Tree Preservation) (England) Regulations 2012 (application for consent under tree preservation order).

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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);
Appendices (attached):	**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 **Appendix 6:** Revised five-year land supply position to reflect the Schedule of Proposed Main Modifications **Appendix 7:** Equalities Impact Assessment of the Epsom and Ewell Local Plan 2022-2040 Schedule of Proposed Main 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 Licencing and Planning Policy Committee on the 22 September 2026 agreed to 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.

Recommendation (s)

The Council is asked to:

(1) Approve that a public consultation on the Proposed Main Modifications to the Submission Local Plan (Appendix 1) and the supporting documents contained in Appendices 2, 3 and 4, is undertaken for a period of six weeks to commence on or around Monday 2 November

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 proposed 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, following a decision by Full Council on 10 December 2024. 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 complaint (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 The vast majority of the proposed main modifications to the policies were discussed during the Stage 2 Hearings in September and October 2025, except for the main modifications relating to the proposed inclusion of additional sites.

2.6 Following the close of the hearings in July 2026, 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 and in the case of additional site allocations, direction from the Inspector as to the additional sites that she wanted the Council to prepare draft policy wording for. 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).

2.7 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.

2.8 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.

2.9 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

2.10 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.

2.11 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.

2.12 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

2.13 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).

2.14 Council are being asked to agree that the statutory consultation commences for a period of six weeks. It is anticipated that this will take place from Monday 2 November until Monday 14 December 2026. The recommendation is worded to allow officers to commence on an alternate date should there be a need to delay the start for any reason.

2.15 It is important to note that no changes can be made 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) prior to the consultation commencing. This is because the Inspector is seeking views on the changes (MMs) that she feels are necessary to make the plan sound.

Additional Modifications and five-year land supply position

2.16 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.

2.17 The Council has also prepared a revised five-year land supply position (Appendix 6) to reflect the proposed Main Modifications.

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 set out in this section.

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 in Table 1 below:

Table 1 – Core Proposed Main Modifications

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	<u>Land to the North of College Road:</u> A minimum of 530 dwellings, employment hub, specialist school provision (up to 2.5ha) and public open space <u>Land to the South of College Road:</u> Public open space with improved pedestrian and cycle connectivity to Epsom Downs Station and playing pitches and supporting facilities.	**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 Table 2 below shows the resulting changes to the housing supply detailed in Policy S1.

Table 2 – Housing Supply Chanes resulting from the proposed main modifications

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 removed 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.

3.7 It is important to note that the housing requirement resulting from the MMs (386 homes per annum for the period 2026/27 – 2039/40) is significantly lower than both the housing need generated by the governments standard method output that applied at the time the plan was submitted for examination (569 homes per annum) and the current output (834 homes per annum).

Policy S6 - Affordable Housing

3.8 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

3.9 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

3.10 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 identify of place with heritage. This is reflected in proposed MM74.

Policy DM15 - Green Belt

3.11 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 MM82.

4 Importance of having an up-to-date Local Plan in place

4.1 The current Epsom and Ewell Development Plan consists of three locally produced documents detailed below:

- Core Strategy (adopted 2007)
- Plan E Area Action Plan (adopted 2011)
- Development Management Policies (adopted 2015)

4.2 It is important to note that two of the above Development Plan Documents adopted by the borough pre-date the introduction of the National Planning Policy Framework and Planning Practice Guidance, which have been updated multiple times since they were published in 2012 and 2016 respectively.

4.3 The Council's existing Development Plan Documents are therefore considered to be out of date which has implications for the determination of planning applications in the borough. Without an up-to-date Local Plan in place the council could find that it is unable to resist unacceptable development or refused applications being allowed on appeal. This could result in unplanned development and in unsustainable locations.

4.4 An up-to-date Local Plan is key to delivering other corporate priorities of the Council, including:

- reducing homelessness through the delivery of more affordable homes, it is important to note that:
    - over 1,450 households are currently on the housing waiting list.
    - over 260 households are housed in temporary accommodation, with almost half of these being in nightly paid accommodation.
    - no affordable housing was delivered in the Borough in the 2025/26 monitoring year.
- investigating future options for the existing Town Hall which is contained in the Local Plan (see proposed MM13).

4.5 The Local Plan is not just about housing, it includes up-to date policies to secure higher environmental standards and quality design from development, in addition to setting out policies for shaping development in the boroughs town and local centres.

4.6 The Local Plan (as submitted to the Inspector in March 2025) includes some ambitious policies in relation to net zero carbon (Policy DM10) and Biodiversity net gain requirements from specific sites that go beyond national standards. The Inspectors proposed main modifications do not propose changes to these requirements.

5 Next Steps for the Local Plan

Option 1 – Recommendation to consult on the Proposed Main Modifications (as recommended by LPPC):

5.1 If Council approve the recommendation to commence the public consultation for a period of six weeks this 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)

5.2 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.

5.3 Following the close of the consultation all representations will be shared with the Inspector and following her approval published on the Examination webpage.

5.4 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.

5.5 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 – Full Council do not approve the consultation to commence.

5.6 If Council do not approve the recommendation to commence the statutory public consultation for a period of six weeks, the Local Plan Examination cannot proceed.

5.7 The Head of Planning Policy and Economic Development would need to notify the appointed Planning Inspector in writing as soon as possible of the decision made by Council not to proceed with the Main Modifications Consultation.

5.8 We would then anticipate a response from the Planning Inspector on next steps.

5.9 If the Local Plan does not progress, it is important to note that:

- this will frustrate the delivery of council priorities (see para 4.4).
- the Council will not have an up-to-date Local Plan in place for at least 3 years which increases the risk of speculative development and costs to the authority in defending planning appeals.
- any new Local Plan (and the supporting evidence base) will need to be prepared under the recently introduced planning system, and it is uncertain at this time how local plans will be progressed in East Surrey (see paras 9.6-9.8).
- the Council will not be able to secure higher biodiversity net gain standards from specific sites or implement the net zero carbon policy.

6 Risk Assessment

Legal or other duties

6.1 Equality Impact Assessment (EqIA)

6.1.1 An EqIA (Appendix 7) has been prepared to appraise the Proposed Main Modifications to ensure that the proposed amendments to the submission Local Plan promotes equality and does not discriminate.

6.1.2 The EqIA concludes that the overall the intentions of policies have not fundamentally changed from the Submission Local Plan and overall the assessment demonstrates a positive policy response in equality terms.

6.2 Crime & 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

6.5 Other

6.5.1 None.

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 to concluding the Local Plan Examination 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 24 considerations:** Examination proceeding to conclusion is within existing budgets. If the Council does not progress, no budget to progress a new local plan so this could have section 24 considerations.

7.5 **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.

7.6 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.

7.7 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 Licencing 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**: It is anticipated that this will be the last Local Plan prepared by Epsom and Ewell Borough Council, although this is subject to officer discussions with East Surrey Council representatives. 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 Strategies 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:

- Licencing and Planning Policy Committee, Epsom and Ewell Local Plan (2022-2040) Main Modifications Consultation - Licencing and Planning Policy Committee, 22 September 2026
- Council, Proposed Submission Epsom and Ewell Local Plan, 10 December 2024
- 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

September 2026

Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ 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 Number/paragraph number	Main modification	Reason for modification
MM1	10-12	Introduction	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' (identifiable by the policy starting with the prefix S), and 'site allocations' (identifiable by the policy starting with the prefix SA), 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. 1.19. There are also detailed (non-strategic) policies called 'Development Management' policies, (identifiable by the policy starting with the prefix DM), 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. 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 41,464 sqm of additional employment floorspace (HEDNA, 2023).	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 Necessary to identify the employment needs in the borough over the plan period to ensure the plan is effective and positively prepared
MM2	15-16	Vision	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	Necessary to amend wording to ensure clarity effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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. **Vision** ~~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.~~ 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. 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.	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
			Ewell Village and Stoneleigh Broadway centres will provide hubs for the communities they serve through convenience shopping and other commercial services and public services. 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. 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. ~~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.~~	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~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.~~ ~~New vibrant communities with their own identities will be centred around previously underdeveloped transport hubs and principal movement corridors.~~ ~~The economy will be thriving, benefiting from high-speed digital infrastructure, and performing to its full economic potential, attracting new, and supporting existing businesses, from start-ups to larger companies.~~ ~~The Epsom Downs racecourse will continue to be a significant part of the borough's unique identity and support a thriving equestrian sector.~~ ~~Epsom Town Centre will have remained the principal urban centre in the borough and new development will have reflected and enhanced its urban qualities, with a rich collection of uses, compact neighbourhoods and safe streets. There will be more people living in the centre helping to support it as a prosperous market town, whilst supporting the existing shops, leisure cultural uses, public~~	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~transport services and community facilities that are so valued by existing residents.~~ ~~New development here will have secured investment in wider public realm improvements, providing more trees to help to cool streets in the summer and provide a more attractive place and new habitat for birds and other wildlife. It will be a place where people naturally choose to walk and cycle to and around, because the surrounding environment is even more pleasant.~~ ~~The town centre will attract the best students and academic staff with modern facilities housing the University of Creative Arts and the Laine Theatre Arts School, who in turn contribute to the local economy. Graduates will have access to affordable space within the town centre to make and sell their creations, making Epsom Town Centre even more distinctive from other nearby centres.~~ ~~Ewell Village and Stoneleigh Broadway centres will continue to provide a distinct place identity and a hub for the community through convenience shopping and other commercial services such as professional services, restaurants, and public services like libraries. Infill and redevelopment opportunities will have been taken,~~	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~increasing the number of residents served by these centres, helping to make them more viable in the longer term.~~ ~~Development across the borough will have been supported by improvements in community and transport infrastructure, with active travel networks having been a core part of growth in the borough improving air quality and benefiting the health and well-being of residents.~~ ~~Epsom and Ewell will 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.~~ ~~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~~	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~past mistakes by replacing poorly designed buildings and spaces with higher quality sustainable development.~~ ~~The borough's identity will have been strengthened, with the existing character of places in the borough having played an important role in shaping development proposals in terms of building materials, proposed built form, retention of important views and vistas and improvements to the public realm.~~	
MM3	18-23	Policy S1	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~~3,336~~ dwellings which when combined with completions, commitments and windfalls accounts for ~~(~~approximately 3~~5~~3% 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. 3.9. Through the allocation of ~~five~~ nine sites to be ~~inset~~ removed from the Green Belt, the council will be able to deliver an additional ~~1,580~~2,497 dwellings over the plan period, which combined with the urban area supply equates to approximately ~~48~~59% of the need established by the standard methodology. This is the	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
			council's preferred spatial strategy which balances social, economic and environmental objectives. 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. *New paragraphs in-between para. 3.13 and 3.14:* <u>The HEDNA employment modelling based on the baseline jobs growth scenarios forecasts over the Local Plan period a need for approximately:</u> • <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> <u>In relation to supply, making use of vacant office floorspace in borough, specifically, Epsom Town</u>	Necessary to clarify employment needs to ensure the plan is effective and positively prepared. New paragraphs to clarify employment needs necessary to ensure the plan is effective and consistent with national policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			Centre is likely to satisfy forecast employment needs for office accommodation over the plan period. 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. 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. These conclusions were revisited in 2025 and concluded to be robust. 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	Modification to clarify the most recent review of the retail needs evidence is up to date and robust. Necessary for clarity and effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			their role in the spatial strategy is shown in ~~Figure 3.1~~ the hierarchy of development detailed below: ~~3.22. The hierarchy of development is detailed overleaf:~~ 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. 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). 3.33. When considering all sources of supply, the Local Plan housing requirement has been set as a minimum of ~~4,700~~ 6,012 dwellings over the plan period (2022-2040).	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 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

<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy Number/paragraph number</th><th>Main modification</th><th>Reason for modification</th></tr>
<tr><td></td><td></td><td></td><td>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 <u>402</u><s>14</s> 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).

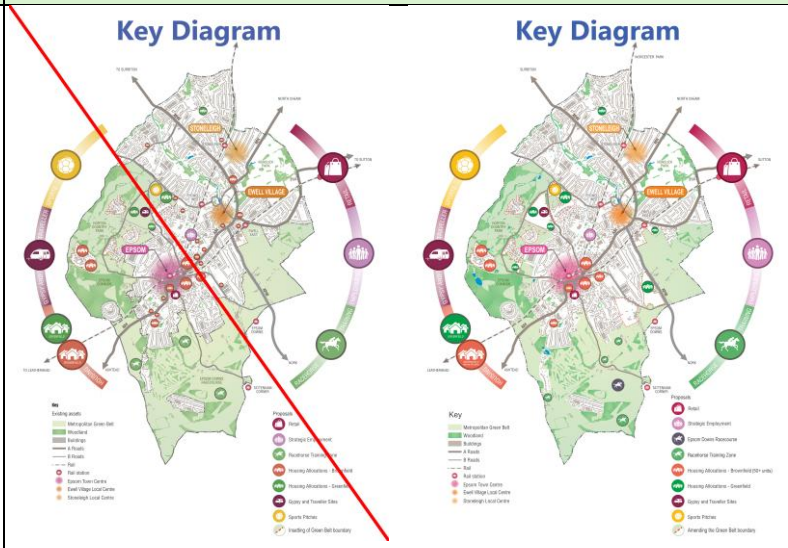
Table S1a: Sources of supply over the Local Plan period: 2022-2040 (net number of new homes)
<table>
<tr><th>Source of supply</th><th>Net no. of units</th></tr>
<tr><td>Housing Requirement</td><td><u>6,012</u>
<s>4,700</s></td></tr>
<tr><td>Housing completion to date (April 2022 to March 20<s>24</s><u>26</u>)</td><td><u>605</u> <s>456</s></td></tr>
<tr><td>Commitments (permissions as of April 20<s>24</s><u>26</u>) with 10% lapse rate applied</td><td><u>604</u> <s>600</s></td></tr>
<tr><td>Windfall (1-4 units)</td><td><u>385</u> <s>455</s></td></tr>
<tr><td>Windfall (5-19 units)</td><td><u>333</u> <s>407</s></td></tr>
<tr><td>Large urban sites (20+ units)</td><td><u>1,477</u>
<s>1,313</s></td></tr>
</table></td><td>to remove unnecessary duplication.

Modified to reflect increased housing supply and trajectory, necessary for plan to be positively prepared and consistent with national policy

It is necessary for the policy to modify housing requirements in order to be positively prepared and consistent with national policy</td></tr>
</table>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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** **Policy S1 – Spatial Strategy** 1) During the plan period (2022-2040): a) provision has been made for at least ~~4,700~~ 6,012 new homes The minimum requirement is split into an annual average requirement on a stepped basis as follows: • Years 1 – 4 (2022/23 – 2025/26) – 152 homes per annum • Years 5 – 18 (2026/27 – 2039/40) – 386 homes per annum Table S1a shows the contribution of all sources of housing supply to deliver this housing requirement. b) ~~Employment needs~~ At least 41,464 sqm of employment floorspace (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	Modified to reflect increased housing supply and trajectory 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 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

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			floorspace that is compatible with residential use in Epsom Town Centre. 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. 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. 2) The Council will expect the development proposals and use of land to contribute positively to the social, economic and environmental enhancement of the Borough.	
MM4	24	Key diagram	*Amended key diagram to show changes to Green Belt boundary, the correct Green Belt boundaries, changes to Racehorse Training Zone, additional site allocations and other minor amendments:*	To ensure the key diagram is positively prepared and consistent with national policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
				
MM5	25	Policy S2	**Policy S2 – ~~Sustainable and~~ Viable Development** ~~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.~~ 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	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 Necessary for effectiveness and in order to reflect changes to other policies in the Plan Additional text necessary for effectiveness and to reflect changes to other policies in the

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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. 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. ~~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.	Plan removing unnecessary duplication Modified text necessary for effectiveness and to ensure policy is positively prepared ...

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~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.~~ 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.~~ **<u>Viability late stage reviews</u>** <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</u>	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
			requirements are not met in full at the time permission is granted. ~~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. ~~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). ~~3.41~~ 3.42. For schemes where the ~~outturn test~~ late stage review demonstrates that viability has improved and 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	

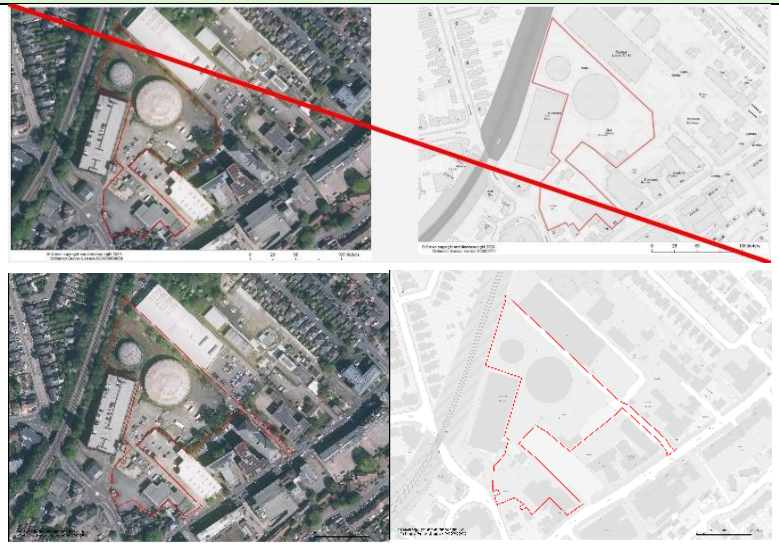
Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			be provided on site (where feasible) or through an in lieu contribution to offsite affordable housing. **Policy S2 – ~~Sustainable and~~ Viable Development** ~~**Sustainable Development**~~ ~~1) When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The council will always work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.~~ ~~2) Planning applications that accord with the policies in the Local Plan (and, where relevant, with policies in Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise.~~ ~~3) Where there are no policies relevant to the application or they are out of date at the time of making the decision then the council will grant permission unless material considerations indicate otherwise – taking into account whether:~~ ~~a) any adverse impacts of granting 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~~	Necessary for effectiveness for 'sustainable development' parts of the policy moved to policy S1 and to remove unnecessary duplication

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~b) specific policies in the National Planning Policy Framework indicate that development should be restricted.~~ **~~Viable Development~~** ~~4~~1) ~~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. ~~5~~2) ~~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 unforeseen significant additional costs. The council will commission an independent review of submitted viability assessments which will be funded by the applicant.	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~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.~~ ~~7~~3) 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.	
MM6	27	Policy S3	**Policy S3 – Climate Change Adaption 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** 1) Epsom Town Centre is defined on the policies map. Development will be permitted here which: ~~The Council will work with partners and private developers to:~~ a. Promotes ~~Encourage~~ the regeneration of the town centre to deliver high quality and high density development that makes efficient use of land through the redevelopment of the site allocations detailed in this plan and other windfall sites that may come forward in the future;	Modifications to include adding reference to the efficient use of land, securing mixed uses and criteria g. Necessary for the effectiveness of the policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			b. ~~Encouraging~~ Secures 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. Maintains and enhances the visitor experience and night-time economy; d. Retains and enhances existing markets and support opportunities for the creation of new markets; e. Delivers 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. Supports the delivery of the Surrey Local Transport Plan 4 and any successors, and proposals in the Epsom and Ewell Local Cycling and Walking Infrastructure Plan to support the transition towards zero carbon transport; g. Ensures the distinctive character of Conservation Areas within the town centre boundary are conserved ~~and, where possible,~~ or enhanced.	Necessary for effectiveness to recognise the role that residential use play within the town centre and remove the reference to policies map as this

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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.~~	has been moved to the policy wording
MM8	32	Para 4.3	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.	Modified to more appropriate wording on Green Belt allocations and the additional references to additional site allocations Necessary for effectiveness and ensuring the Plan is positively prepared
MM9	33	Policy SA1	**Policy SA1 – Southern Gas Network Site** **Allocated for:** ~~Approximately~~ A minimum of ~~455~~ 456 dwellings ~~(C3)~~ and a bespoke performing arts centre for the Laine Theatre Arts. **Site Area:** ~~1.54~~ 61.69 ha **Planning history:** Application reference 24/01107/FUL (permitted)	Modified to reflect number of units as a minimum of 456 dwellings necessary to ensure consistent with national policy and optimising density Removed 'C3' , Modified site area and added 'permitted' with the addition of application 'reference' wording all for effectiveness Part a) modified for effectiveness and to recognise potential conflict between users in this location

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			 In addition to complying with the policies in the plan, any developer of this site will be required to: a) 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> b) 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. c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water	Part b) amended to reflect planning permission Remaining parts of the policy amended for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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 Groundwater Source Protection Zone 1~~, as well as meeting the requirements for sustainable drainage in Policy S16~~. e) Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied. 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. 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, through design incorporating positive elements of local character and appearance. h) Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			i) Be designed ~~Design~~ to enable the comprehensive redevelopment of the adjoining Hook Road Car Park site (Site Allocation SA2) as a future phase. j) Include mixed use ground floor active frontages providing Commercial, Business and Service floorspace to provide natural surveillance of the public realm.	
MM10	35	Policy SA2	**Policy SA2 – Hook Road Car Park** **Allocated for:** ~~Approximately~~ A minimum of 145 ~~150~~ dwellings. **Site Area:** 0.48~~6~~ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site that is designed to minimise potential conflict between car users, pedestrians and cyclists. 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	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 Part j) Include wording to reflect future car park study to ensure policy is positively prepared

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			located in Groundwater Source Protection Zone 1~~;~~ ~~as well as meeting the requirements for sustainable drainage in Policy S16~~. d) Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied. 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. f) Conserve ~~and, where possible,~~ or enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings. g) Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential. h) Be designed as a future phase of the adjoining Southern Gas Networks Site (Site Allocation SA1). i) Include mixed use ground floor active frontages providing Commercial, Business and Service floorspace to provide natural surveillance of the public realm.	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			j) Consider the findings of the Councils car parking study and its recommendations in relation to public car parking provision at the site.	
MM11	36	Policy SA3	**Policy SA3 – Solis House, 20 Hook Road** **Allocated for:** ~~Approximately~~ A minimum of 20 dwellings ~~(C3).~~ **Site Area:** 0.07ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: 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 subject to a significant adverse level of noise disturbance from the adjoining railway line.	Modified to reflect number of units as a minimum necessary to ensure consistent with national policy and optimising density Removed 'C3' as use classes, part a, f and g all modified for effectiveness Part h) Criteria added in terms of design to reflect the site's prominent location to ensure policy is positively prepared

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			e) Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied. f) Conserve ~~and, where possible,~~ or enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings through sensitive design incorporating positive elements of local character and appearance. g) Undertake archaeological investigations in accordance with Policy DM13 ~~15~~, taking account of the site's location within an Area of High Archaeological Potential. h) Consider the site's prominent location for a high-quality designed landmark building.	
MM12	37	Policy SA4	**Policy SA4 – Bunzl, Hook Road** **Allocated for:** ~~Approximately~~ A minimum of 35 ~~20~~ dwellings. **Site Area:** 0.17ha **Planning history:** Application reference 24/00230/FUL & 23/01440/PDCOU (both permitted) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site.	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 Part a) modified to address site specific access for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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. 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~~, as well as meeting the requirements for sustainable drainage in Policy S16.~~ 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.	Add 'conserve or enhance' to all references in site allocations Part d) For clarification purposes
MM13	38	Policy SA5	**Policy SA5 – Epsom Town Hall** **Allocated for:** ~~Approximately~~ A minimum of 90 dwellings ~~(C3).~~ **Site Area:** 0.74ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Dullshot Green.	Modified to reflect number of units as a minimum necessary to ensure consistent with national policy and optimising density Removed 'C3' as use classes, amended parts a, e,f, g and h to ensure policy is positively prepared

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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 DM13~~15~~ 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 through sensitive design incorporating positive elements of local character and appearance. g) Retain some public car parking which includes blue badge spaces. h) Maximise linkages with the town centre by integrating cross site movement routes for pedestrians and cyclists.	
MM14	39	Policy SA6	**Policy SA6 – Hope Lodge Car Park** **Allocated for:** ~~Approximately~~ A minimum of 35 ~~30~~ dwellings ~~(C3).~~	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
			Site Area: 0.4ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Du<u>l</u>lshot 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 ~~15~~, 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>	with national policy and optimising density Removed 'C3' as use classes, amended parts a,b,e and f for effectiveness Amend part g Include wording to reflect future car park study to ensure policy is positively prepared Changes necessary to ensure policy is justified and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM15	40	Policy SA7	**Policy SA7 – Former Police and Ambulance Station Sites** **Allocated for:** Erection of a new 85 bedroom residential, nursing and dementia care home for the frail elderly ~~(Use Class C2)~~. **Site Area:** 0.37ha **Planning history:** Application reference 22/00923/FUL (approved~~, subject to S106 agreement~~) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and 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 through sensitive design incorporating positive elements of local character and appearance. e) Minimise loss of existing trees, including appropriate root protection for those immediately adjacent to the site.	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 Parts a and d modified to ensure the policy is effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM16	41	Policy SA8	**Policy SA8 – Epsom Clinic** **Allocated for:** ~~Approximately~~ A minimum of 30 dwellings. **Site Area:** 0.17ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and 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 through sensitive design incorporating positive elements of local character and appearance. c) Undertake archaeological investigations in accordance with Policy DM13~~15~~, 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.	Modified to reflect number of units as a minimum of 30 necessary to ensure consistent with national policy and optimising density Part a) site specific vehicular access and transport needs modified for effectiveness as are parts b, and c
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
			Allocated for: ~~Approximately~~ A minimum of 100 dwellings ~~(C3)~~ and a decked public car park. **Site Area:** 1.24ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and 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) Conserve or enhance ~~Have regard to~~ the setting of the adjoining Pikes Hill Conservation Area located to the east of the site through sensitive design. 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 DM13~~15~~, 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.	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

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			g) Consider the findings of the Councils car parking study and its recommendations in relation to public car parking provision at the site.	
MM18	43	Policy SA10	**Policy SA10 – 79-85 East Street** **Allocated for:** ~~Approximately~~ A minimum of 34 dwellings ~~(C3).~~ **Site Area:** 0.22ha **Planning history:** Application reference 22/01953/FUL and 22/01954/FUL (both permitted) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from East Street and/or Linton's Lane. ~~a~~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. ~~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. ~~c~~d) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.	Modified so the number of units reflected as a minimum of 34 units necessary to ensure consistent with national policy and optimising density Removed 'C3' as use class and changed to criteria a and d to ensure the policy is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~d~~e) 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	**Policy SA11 – Finachem House, 2 – 4 Ashley Road** **Allocated for:** ~~Approximately~~ A minimum of 38 ~~20~~ dwellings ~~(C3)~~ or 90 units of student accommodation **Site Area:** 0.12ha **Planning history:** Pre-application In addition to complying with the policies in the plan, any developer of this site will be required to: 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
			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) 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 through sensitive design incorporating positive elements of local character and appearance. f) Undertake archaeological investigations in accordance with Policy DM13~~15~~, taking account of the site's location within an Area of High Archaeological Potential. g) Consider the site's prominent location for a high-quality design landmark building.	

MM20	45	Policy SA12	**Policy SA12 – Global House** **Allocated for:** ~~Approximately~~ A minimum of 75 dwellings ~~(C3)~~ **Site Area:** 0.29ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide appropriate pedestrian and cycle access to the site from Ashley Avenue. 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. 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) Conserve ~~and, where possible,~~ or enhance the setting of the nearby Epsom Town Centre Conservation Area and listed buildings through sensitive design incorporating positive elements of local character and appearance. f) Undertake archaeological investigations in accordance with Policy DM15~~3~~, taking account of the site's location within an Area of High Archaeological Potential.	Modified to reflect the number of units as a minimum of 75 necessary to ensure consistent with national policy and optimising density. 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 All changes necessary changes for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM21	46	Policy SA13	**Policy SA13 – Swail House** **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. **Site Area:** 1.05ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle~~, pedestrian and cycle~~ access to the site from Heathcote Road and pedestrian and cycle access from Heathcote Road and Ashley Road. b) 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. 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 Groundwater Source Protection Zone 1. e) 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
			the site through sensitive design incorporating positive elements of local character and appearance. f) Retention of the Grade II listed wall that forms part of the site boundary. g) Undertake archaeological investigations in accordance with Policy DM13~~15~~, taking account of the site's location within an Area of High Archaeological Potential.	
MM22	47	Policy SA14	**Policy SA14 – 60 East Street** **Allocated for:** ~~Approximately~~ A minimum of 30 dwellings ~~(C3)~~ **Site Area:** 0.24ha **Planning history:** Application reference 24/00900/PDCOU (permitted prior approval) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from East 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.	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	**Policy SA15 – Corner of Kiln Lane and East Street (101b East Street)** **Allocated for:** ~~Approximately~~ A minimum of 5 dwellings	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
			Site Area: 0.03ha **Planning history:** Application reference 15/01663/FUL (unimplemented) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and 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) Consider the site's prominent location for a high-quality designed landmark building.	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
MM24	49	Policy SA16	**Policy SA16 – Land at Kiln Lane** **Allocated for:** ~~Approximately~~ A minimum of 40 dwellings **Site Area:** 0.67ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Kiln Lane. 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.	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. Necessary changes made for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			d) Design the scheme to ensure the amenity impacts on future occupiers from adjacent non-residential uses is adequately addressed.	
MM25	50	Policy SA17	**Policy SA17 – Hatch Furlong Nursery** **Allocated for:** ~~Approximately~~ A minimum of 30 dwellings ~~(C3)~~ **Site Area:** 0.5ha **Planning history:** None 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 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. Provide pedestrian and cycle access to the site from Cheam Road. 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
			~~c)~~ d) Undertake archaeological investigations in accordance with policy DM13~~15~~, taking account of the site's location within an Area of High Archaeological Potential. ~~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.	
MM26	51	Policy SA18	**Policy SA18 – Land to the Rear of Rowe Hall** **Allocated for:** Extra Care Accommodation ~~(Class C2)~~ comprising 96 self contained apartments, staff and communal facilities. **Site Area:** 1.23~~7~~ha **Planning history:** Outline Planning Application Granted June 2024 Reference: EP23/00633/CMA In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from ~~the~~ Salisbury Road. b) Provide a revised Scouts Hut curtilage to include a new parking amenity area incorporating the shared access way. 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.~~	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 changs necessary for effectiveness of the policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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. e) Facilitate access to public transport including bus or other public transport services including facilities that encourage public transport use. f) 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.	
MM27	52	Policy SA19	**Policy SA19 – 7 Station Approach** **Allocated for:** ~~Approximately~~ A minimum of ~~5~~ 8 dwellings ~~(C3)~~ **Site Area:** 0.04ha **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) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site. b) Design surface and foul water drainage to include all required measures arising from the site being located in a Groundwater Source Protection Zone 3.	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	**Policy SA20 – Esso Express, 26 Reigate Road** **Allocated for:** ~~Approximately~~ A minimum of 10 dwellings ~~(C3)~~ **Site Area:** 0.25ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate: i) vehicle, pedestrian and cycle access from the Ewell By-Pass. ii) pedestrian and cycle access from Reigate 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) 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 DM13~~15~~, 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	**Policy SA21 – Richards Field Car Park** **Allocated for:** ~~Approximately~~ A minimum of 7 dwellings and the retention of a minimum of 7 public car parking spaces. **Site Area:** 0.07ha	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
			Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: 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	**Policy SA22 – Etwelle House, Station Road** **Allocated for:** ~~Approximately~~ <u>A minimum of</u> 20 dwellings ~~(C3)~~ **Site Area:** 0.2ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: 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	~~**Policy SA23 – 140-142 Ruxley Lane**~~ ~~**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:~~ ~~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	**Policy SA24 – Garages at Somerset Close & Westmorland Close** **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:	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
			a) Provide safe and appropriate vehicle, pedestrian and cycle access from Somerset Close and Westmorland Close. 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	**Policy SA25 – 64 South Street Epsom** **Allocated for:** ~~Approximately~~ A minimum of 10 dwellings **Site Area:** 0.14ha **Planning history:** Application reference 20/00041/FUL - COU from B1 to 6 dwellings (lapsed) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate: i) vehicle, pedestrian and cycle access from Saint Margaret Drive; ii) pedestrian and cycle access 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 Groundwater 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
			d) Undertake archaeological investigations in accordance with Policy DM13~~15~~, taking account of the site's location within an Area of High Archaeological Potential. e) Conserve ~~and, where possible,~~ or enhance the setting of the Woodcote Conservation Area and the adjacent Grade II listed Abel Cottages through sensitive design incorporating positive elements of local character and appearance.	
MM34	59	Policy SA26	**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) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide appropriate and safe vehicle, pedestrian and cycle access to the site from Alexandra Road. 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 Groundwater 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 refence to policy S16, all changes necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM35	60	Policy SA27	**Policy SA27 – 22-24 Dorking Road** **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) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Dorking Road and / or White Horse Drive. b) Conserve ~~and, where possible~~ or enhance the setting of the Grade II* and Grade II listed buildings in close proximity to the site through sensitive design incorporating positive elements of local character and appearance.	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	**Policy SA28 – 63 Dorking Road** **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 In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and 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
			b) Retain and convert ~~Conserve and enhance~~ the part of the building that is Grade II Listed. c) Conserve or ~~and~~ enhance the setting of the Grade II Listed buildings adjoining the site through sensitive design incorporating positive elements of local character and appearance.	related text at part c all necessary for effectiveness
MM37	62	Policy SA29	~~**Policy SA29 – 65 London Road**~~ ~~**Allocated for:** Care home up to 81 bedrooms (use class C2)~~ ~~**Site Area:** 0.30ha~~ ~~**Planning history:** 23/00817/FUL (approved, but not implemented), 22/00728/FUL (approved, but not implemented) and 20/01079/FUL (approved, but not implemented)~~ ~~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 to the site from London Road.~~ ~~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.~~ ~~c) Conserve and, where possible, enhance the setting of the Grade II listed buildings in close proximity to the site.~~	Policy deleted as permission being implemented

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM38	63	Policy SA30	**Policy SA30 – Epsom General Hospital** **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)~~ **Site Area:** 1.45ha **Planning history:** Application reference: 21/00252/FUL (granted at appeal, development commenced), 20/00108/FUL (approved) and 19/01722/FUL (refused) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Woodcote Green Road. b) 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 ~~b~~c) 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	**Policy SA31 – Land at West Park Hospital (South)** **Allocated for:** ~~Approximately~~ A minimum of 50 dwellings ~~(C3)~~ **Site Area:** 1.81ha	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
			Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>from Richmond Crescent.</u> <u>b) 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,~~ <u>or</u> 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,	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

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			incorporating these in a coherent landscaping strategy for the site. ~~f)~~g) Undertake archaeological investigations in accordance with Policy DM13~~15~~, taking account of the site's location within an Area of High Archaeological Potential.	
MM40	65	Policy SA32	**Policy SA32- Land at West Park Hospital (North)** **Allocated for:** ~~Approximately~~ A minimum of 18~~5~~0 dwellings ~~(C3)~~ **Site Area:** 5.22 ha **Planning History:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from the existing hospital access road. ~~and enable the site to be served by public transport~~ b) 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 ~~b~~c) Provide permeability through the site for pedestrians and cyclists into and from development to provide	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
			connectivity between adjoining residential areas and Horton County Park. ~~c~~d) 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. ~~d~~e) 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~~f) Conserve ~~and, where possible,~~ or ~~–~~enhance the setting of the West Park Conservation Area and Grade II listed water tower that lies to the south of the site through sensitive design incorporating positive elements of local character and appearance. ~~f~~g) Ensure that site layout that retains and safeguards existing mature trees as part of a coherent landscaping strategy for the site. ~~g~~h) Undertake archaeological investigations in accordance with policy DM13~~15~~, taking account of the site's location within an Area of High Archaeological Potential	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM41	66	Policy SA33	**Policy SA33- Land at Chantilly Way** **Allocated for:** ~~Approximately~~ A minimum of 30 dwellings ~~(C3)~~ **Site Area:** 0.7 ha **Planning History:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Chantilly Way. 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. ~~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. ~~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.~~ d) Minimise the loss of existing trees, including appropriate root protection for those immediately adjacent to the site. e) 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	**Policy SA34- Hook Road Arena** **Allocated for:** New Sports Hub for community use in the borough to include playing pitches (grass and artificial), a new pavilion and changing facilities. The provision of a minimum of ~~approximately~~ 100 dwellings ~~(C3)~~ on the eastern part of the site. **Site Area:** 14 ha **Planning History:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from the existing access on Hook Road. b) Facilitate access to public transport including bus services operating within the vicinity of the site to ensure connectivity to the wider area. ~~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. ~~c)~~d) Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees,	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

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			incorporating these in a coherent landscaping strategy for the site. ~~d)~~e) Achieves a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric. f) enter a community use agreement in relation to the use of the sports hub.	
MM43	68	Policy SA35	**Policy SA35 – Land at Horton Farm** **Allocated for:** ~~Approximately~~ A minimum of 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. **Site Area:** 37.9 ha **Planning History:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Chantilly Way and Horton Lane ~~and enable the site to be served by public transport~~ b) 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.	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 Changes necessary to ensure the policy is justified, effective and positively prepared

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~b~~d) Provide permeability through the site for pedestrians and cyclists ~~into and from the development~~ to provide connectivity within the site and to ~~between~~ adjoining ~~residential~~ areas and associated facilities including Horton Local Centre and Horton County Park. ~~c~~e) Provide a community building, capable of accommodating early years education provision and other community uses responding to the needs of the locality. ~~d~~f) 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. ~~e~~g) 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. ~~f~~h) Establish a legal mechanism for long term management of green and blue infrastructure and children's play space on the site, providing access for	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			recreational purposes by the general public as well as residents of the development. ~~g~~i) 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). ~~h~~j) 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. ~~i~~k) 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. ~~j~~l) Conserve ~~and, where possible,~~ or enhance the setting of Grade II Listed Horton Farm House through sensitive design incorporating positive elements of local character and appearance. ~~k~~m) 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. ~~l~~n) Achieves a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM44	n/a	New site allocation SA36	**Policy SA36 – 25 Alexandra Road, Epsom** **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) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Alexandra Road. b) Maximise the retention and safeguarding of TPO mature trees within the site and incorporate those features 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 Groundwater Source Protection Zone 1. d) Ensure the re-use the stained-glass window from the locally listed building located on the site in any future	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	**Policy SA37 – Gainsborough Road estate, Epsom** **Allocated for:** A minimum of 8 dwellings **Site Area:** 0.26 ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate: i) vehicle, pedestrian and cycle access to the East parcel from Harvester Road ii) vehicle, pedestrian and cycle access to the West parcel from Gainsborough Road. 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.	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	**Policy SA38 – Parking at 54 Gainsborough Road** **Allocated for:** A minimum of 6 dwellings **Site Area:** 0.10 ha **Planning history:** Pre-application In addition to complying with the policies in the plan, any developer of this site will be required to: a) 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	**Policy SA39 – 85b Hook Road, Epsom** **Allocated for:** A minimum of 8 dwellings **Site Area:** 0.14 ha **Planning history:** None 	Additional allocation to ensure the plan is positively prepared and effective

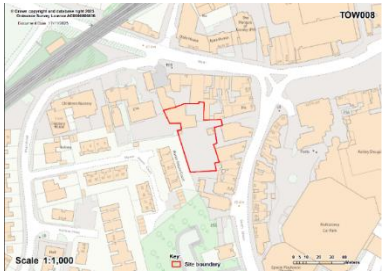
Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Hook Road. b) Incorporate 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.	
MM48	n/a	New site allocation SA40	**Policy SA40 – Land west of Ewell By-Pass** **Allocated for:** A minimum of 38 dwellings **Site Area:** 0.87 ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to:	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			a) 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. b) Maintain and enhance the footpath along the western edge of the site c) Ensure the site layout maximises retention and safeguarding of mature trees, incorporating these in a coherent landscaping strategy for the site. d) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. e) Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential. f) Conserve or enhance the significance and setting of the Ewell Village Conservation Area through sensitive design incorporating positive elements of local character and appearance.	
MM49	n/a	New site allocation SA41	**Policy SA41 – Conservative Club, Epsom Club and Church** **Allocated for:** Mixed use development for community uses (approximately 1,800sqm) and a minimum of 28 dwellings **Site Area:** 0.35 ha **Planning history:** No residential planning history	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			  In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Church Street. b) 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. 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) Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential. e) 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.	

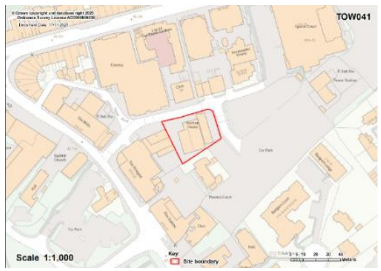
Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			f) Conserve or enhance the setting of the Church Street Conservation Area and Listed Building that adjoin the site, through sensitive design incorporating positive elements of local character and appearance.	
MM50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

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			site's location within an Area of High Archaeological Potential 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) 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. e) Consider the site's prominent Town Centre location for a high-quality designed building. f) 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. g) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.	
MM51	n/a	New site allocation SA43	**Policy SA43 – Land R/O The Albion Public House (Mccaffertys Bar)** **Allocated for:** Mixed use development, a minimum of 11 dwellings and approximately 500sqm commercial, business or service floorspace **Site Area:** 0.14 ha **Planning history:** None	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			 In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from South Street. b) Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential. c) 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. d) Retention of the Grade II listed wall that forms part of the site boundary. e) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM52	n/a	New site allocation SA44	**Policy SA44 – Spread Eagle Shopping Centre** **Allocated for:** Mixed use development to provide retail and leisure uses (approximately 2,000sqm) and student accommodation (a minimum of 40 units) **Site Area:** 0.18 ha **Planning history:** Pre-application In addition to complying with the policies in the plan, any developer of this site will be required to: a) 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. b) 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. c) Undertake archaeological investigations in accordance with Policy DM13, taking account of the	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			site's location within an Area of High Archaeological Potential. 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) 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. 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 A24 and neighbouring uses. g) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.	
MM53	n/a	New site allocation SA45	**Policy SA45 – Auction House, Depot Road** **Allocated for:** Mixed use development to provide commercial, business and service floorspace (approximately 500sqm) and a minimum of 10 dwellings **Site Area:** 0.12 ha **Planning history:** None	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			 In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Depot Road. b) 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. 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.	
MM54	n/a	New site allocation SA46	**Policy SA46 – Laine Theatre Arts** **Allocated for:** A minimum of 6 dwellings **Site Area:** 0.05 ha **Planning history:** None	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from East Street. b) 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. c) Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential. d) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.	
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
			Allocated for: Mixed use development to provide commercial, business and service floorspace (approximately 1,500sqm) and a minimum of 23 dwellings **Site Area:** 0.39 ha **Planning history:** Historic application for 30 flats In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from West Hill. b) Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential. c) 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.	
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
			Allocated for: Residential Care Home providing at least 70 bedrooms **Site Area:** 0.52 ha **Planning history:** Application reference 26/00002/FUL (awaiting determination) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Cherry Tree Lane bordering the western boundary of the site. b) 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. c) Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.	
MM57	n/a	New site allocation SA49	**Policy SA49 – Land off Cuddington Glade** **Allocated for:** Minimum of 45 dwellings **Site Area:** 1.11 ha	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: a) 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. b) 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.	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			c) Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.	
MM58	n/a	New site allocation SA50	**Policy SA50 – Land at Priest Hill** **Allocated for:** 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 **Site Area:** 4.71ha **Planning history:** Pre application (up to 530 dwellings, commercial floorspace, public open space) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate: i) vehicle, pedestrian and cycle access to the site from Cheam Road and Banstead Road; ii) pedestrian and cycle access to Ewell East Station and pedestrian access to the other	Additional allocation to ensure the plan is positively prepared and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			established public rights of way adjoining the site. b) 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. c) Maintain vehicular access for neighbouring users including NESCOT, the neighbouring sports pitches operated by SERFC and residential properties fronting Cheam Road. d) 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. e) Provide off-site improvements to the public rights of way that run adjacent to the railway line connecting Cheam Road and Reigate Road. f) Provide financial contributions towards accessibility improvements at Ewell East Station. g) 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. h) 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	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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. i) The occupation of the development should be phased to align with the delivery of any necessary upgrades to water supply and waste water infrastructure. j) 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. k) Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.	
MM59	n/a	New site allocation SA51	**Policy SA51 – Downs Farm** **Allocated for:** Land to the North of College Road: A minimum of 530 dwellings, employment hub, specialist school provision (up to 2.5ha) and public open space Land to the South of College Road:	Additional allocation to ensure the plan is positively prepared and effective

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

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			supporting infrastructure including bus priority measures where feasible. c) 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. d) 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. e) Provide financial contributions towards improvements at Epsom Downs Station. f) 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. g) 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. h) Provision of a new specialist school of up to 2.5ha on the site.	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			i) The occupation of the development should be phased to align with the delivery of any necessary upgrades to water supply and waste water infrastructure. j) Provide suitable noise and vibration attenuation measures to ensure that future occupiers have an acceptable level of residential amenity given the existing adjoining business. k) 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. l) 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. m) Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric. Land to the South of College Road	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			n) Provide public open space incorporating walking and cycling routes providing connections between College Road, Longdown Lane South and Epsom Downs Station. o) 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.	
MM60	70	Para. 5.3.	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). *Move table S5a into main body of text as below:*	Added source/reference to HEDNA table, necessary for effectiveness Table S5a concerning housing mix moved to the policy wording for effectiveness
MM61	70	Policy S5	**Policy S5: Housing mix and type** Residential development will be permitted where ~~the following criteria are met: a)~~ t~~T~~he 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.~~	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 It is necessary for effectiveness to clarify criteria a and b. These have been combined and reworded

<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy Number/paragraph number</th><th>Main modification</th><th>Reason for modification</th></tr>
<tr><td></td><td></td><td></td><td>Table S5a:Housing Mix
<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>
<u>Key supporting documents</u>
• <u>Housing and Economic Development Needs Assessment (2023)</u></td><td>New key supporting documents section added after Policy S5 necessary for effectiveness</td></tr>
<tr><td>MM62</td><td>71-72</td><td>Policy S6</td><td>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>
New paragraphs inserted after para 5.7.

<u>The policy requires varying levels of affordable housing provision at an overall percentage of dependent upon the location of the development and</u></td><td>It is necessary for effectiveness that reference has been added to staff accommodation and essential local workers housing</td></tr>
</table>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			the use of the land to be developed as defined within the policy. 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. 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. 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. ~~**Vacant building credit**~~ 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.~~	Additional supporting text necessary for effectiveness to set out how affordable housing on site should be distributed Modification necessary to correct policy title to ensure policy is positively prepared Delete as repeats national policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			Policy S6: Affordable Housing 1) The council will require proposals to provide affordable homes on all residential developments comprising self-contained units, as follows: ~~On greenfield sites~~ 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: 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 ~~4~~50% affordable housing of the gross number of dwellings; On greenfield sites located within the defined urban area as identified on the policies map: ~~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; On all other sites ~~b)~~c) Schemes of 10 or more new dwellings or where the site has an area of 0.5 hectares or more, on-site	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

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			provision of 30% affordable housing of the gross number of dwellings; 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) 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; 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.~~ 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; 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	Reworded point 4 to reflect supporting text and ensure policy is justified

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			payment of a financial contribution made (equivalent in value to it being provided on-site). 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> ~~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. ~~7) In a~~<u>a</u>~~ccordance 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.~~ **Key supporting documents** • Housing and Economic Development Needs Assessment (2023) • Local Plan Viability Assessment (2023) • <u>Local Plan Viability Update Note (2024)</u>	It is necessary for additional text to clarify viability evidence in order to be effective and consistent with national policy For effectiveness added viability evidence under 'key supporting documents'

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM63	74-75	Policy DM1	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~~ Emissions and Energy Standards. **Policy DM1: Residential Space Standards** 1) Proposals for new residential dwellings ~~(Use Class C3)~~ will be permitted where: a) the internal space complies with or exceeds the nationally described space standards or any future equivalent. b) the minimum requirements for private outdoor space as set out below are satisfied: i) a 5 sq m balcony within flatted development accessible from the main habitable room ii) a dedicated private garden for houses. Parts 2 and 3 (i) and (ii) of the policy remain the same **Key supporting documents** ● ~~Technical housing standards- nationally described space standards~~	Necessary for effectiveness in terms of the name change to policy DM10 Necessary for effectiveness to remove the use classes to future proof the policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			• Statutory guidance - Technical housing standards- nationally described space standards • ~~Approved Document M – Access to and use of buildings Volume 1: dwellings~~ • Statutory guidance – Access to the use of Buildings- Approved Document M	References to the documents are set out in full for effectiveness
MM64	78-79	Policy S7	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~~. 5.33. Evidence on how this translates to need for the required number of specialist homes or care home 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. 5.34. SCC predicts an oversupply of market extra care units and a minimum need for 75~~146~~ affordable extra care units up to 2035. 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~~	Necessary for effectiveness, and to ensure that the policy uses appropriate definition for specialist housing Necessary for effectiveness to include appropriate definitions & specialist care provision

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~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.~~ **Policy S7: Specialist Housing** 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: 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>	Necessary for effectiveness text modified with regard to specialist housing definition Deletion of criteria g and h as not necessary to make policy effective and justified Modified part 2 to be more effective and removed use class to ensure policy is consistent with national policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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. ~~g) it can be demonstrated that revenue funding can be secured to maintain the long-term viability of the scheme; and~~ h) ~~the scheme is supported by the relevant statutory agencies~~. 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. 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.	
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
			there are exceptional circumstances that might justify their loss. 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.	
MM66	82-85	Policy S8	Transit accommodation provision 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. Assessing applications for Gypsy and Traveller provision ~~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.~~ 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~~	Amended text for clarity and effectiveness Necessary for clarity and effectiveness to reword and remove 'transit'

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~can be integrated~~ is an important consideration in the determination of applications for Gypsy and Traveller provision. 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. **Policy S8: Gypsies, Travellers and Travelling Showpeople** **Safeguarding existing supply** 1) Land authorised for permanent gypsy, traveller and travelling showpeople accommodation will be safeguarded from alternative development. Proposals which involve a change of use of the land or a loss of pitches or plots will not be permitted unless it can be evidenced that they are no longer required or new suitable equivalent provision is made.	Modified Criteria f) to be worded positively around appropriate landscaping. 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

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

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

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~**Meeting future needs within larger unallocated development sites**~~ ~~6~~5~~)~~ ~~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.~~ ~~7~~6~~)~~ ~~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.~~	
MM67	86	Policy S9	~~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	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
			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. *6 new paragraphs inserted after para. 6.1.* 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. 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. 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.	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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. 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. 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. 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~~	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~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. **Policy S9: Economic Development** The sustainable growth of the borough's economy will be promoted to meet the needs of different sectors by: ~~1)~~ 1)~~Supporting the regeneration of Epsom Town Centre by enabling new and established businesses to grow~~ 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~~ The development and intensification of these sites will be supported to provide floorspace for Employment Generating Uses that meets the needs of the market~~.~~ 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	Necessary for clarity and effectiveness to define the two industrial areas in the policy Necessary for clarity and effectiveness to modify text to set out the strategy for the protection and intensification of the industrial sites 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

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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;~~ 3) Safeguarding land and supporting appropriate 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. 4) Supporting the visitor and night-time economy; 5) Supporting the creative and cultural industries and further and higher education providers by protecting existing and enabling the provision of new or extended venues and facilities where appropriate.~~;~~ ~~6) Protecting existing cultural venues, facilities and uses where appropriate and supporting the development of new cultural venues in Epsom Town Centre.~~ **Key supporting documents** • Housing and Economic Development Needs Assessment (2023) • Longmead and Kiln Lane Industrial Estates Economic Value Report (2022) • Retail and Commercial Leisure Needs Assessment Update (2021)	Part 5 and 6 of the policy have been combined for effectiveness and also reworded for the same reason Necessary for clarity and effectiveness to ensure policy is positively prepared

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	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. **Policy S10: Retail Hierarchy and Network** 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	Necessary for clarity and consistency with national policy to define town centre uses Necessary to add reference to neighbourhood parades in order to make the plan effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			shown on the policies map). ~~The wider retail network also includes other retailing locations across our area.~~ 2) The overall hierarchy and network is defined as follows: a) **Town Centre**: Epsom Town Centre b) **Local Centres**: Ewell Village and Stoneleigh Centre c) **Neighbourhood Parades**: • Castle Parade, Ewell • Chessington Road / Green Lanes • Chessington Road / Plough Road • Chessington Road / Ruxley Lane • Gatley Avenue / Ruxley Lane • Horton Local centre • Kingston Road / Bradford Drive • Kingston Road / Ruxley Lane • Manor Green Road, Epsom • Poole Road, Epsom • Pound Lane, Epsom • Rosebery Parade, Kingston Road • Vale Road, Worcester Park • Waterloo Road, Epsom	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM69	89	Policy DM4	6.11. Within Epsom Town Centre, Commercial, Business and Service Use~~s (Class E of the use classes order)~~ are~~is~~ 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 at the planning application stage to avoid over concentration of a specific type of use. 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). 6.12. Within the local centres, a range of Commercial, Business and Service Uses ~~Class E uses~~ and other town centre uses will be supported and where the loss of a Commercial, Business and Service ~~Uses 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. **Policy DM4: Primary Shopping Areas and Retail Frontages** **Epsom Town Centre** 1) Within Epsom Town Centre the Primary Shopping Area (as defined on the policies map), will remain the focus for	Use classes removed for effectiveness, additional text provided in the supporting text to clarify how we would assess Policy Criteria1b over concentration Changes necessary in order to make the policy positively prepared and effective ...

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			retail activity and other town centre uses. Within the Primary Shopping Area: a) Within the primary frontage (as defined on the policies map) at ground floor level development within Commercial, Business and Service use ~~use class E~~ will normally be permitted; b) Within the secondary frontages (as defined on the Policies Map), at ground floor level, development within Commercial, Business and Service Use ~~Use Class~~ will normally be permitted. Sui Generis uses suited to a town centre, Learning and non-residential ~~Class F1 and~~ Institutions and Halls or meeting places for the principal use of the local community ~~Class F2(b)~~ will normally be permitted unless they result in an over concentration of those uses. c) Within the primary and secondary frontages, the effective and efficient use of upper floors for main town centre uses and ~~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. 2) Applications for the loss of Commercial, Business and Service ~~Class E~~ floorspace in the Epsom Town Centre Primary frontages will only be supported where it can be demonstrated that:	Modified references to use classes in order to future proof the policy Necessary changes made in order to ensure the policy is effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			a) There is no reasonable prospect of the site remaining in a Commercial, Business and Service ~~Class E~~ use; b) Opportunities to reconfigure or reuse the site to retain its current use or another Commercial, Business and Service ~~Class E~~ use have been exhausted; c) The site has been marketed in accordance with Appendix 5; d) The proposed alternative use would not adversely affect the vitality and viability of the town centre. **Stoneleigh and Ewell Local Centres** 3) Within the Local Centres (as defined on the policies map) the Council will support: a)~~a~~ A range of Commercial, Business and Service uses ~~Use Class E~~ and other appropriate town centre uses b) Development proposals involving a change of use from Commercial, Business and Service use ~~Class E~~ 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 c) The efficient use of upper floors for main town centre uses or residential use where it can be demonstrated	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			that the loss of this floor space would not impact the viability of the ground floor use	
MM70	93-94	Policy DM6	~~6.20. The boundaries of the neighbourhood parades are shown on the Policies Map.~~ **Policy DM6: Neighbourhood Parades and Isolated Shops** 1) Within the neighbourhood parades (as defined on the Policies Map), development proposals will be permitted providing they satisfy all of the following criteria: a) they are appropriate to the scale and function of the parade b) they maintain or enhance the vitality and viability of the parade c) if at ground floor level: i) they provide an active frontage, such as a shop front or window display, which is in keeping with the character of the centre/parade; ii) they would contribute to range of retail service and community uses which provide for the day to day needs of local people; and iii) The proposal does not result in an over concentration of a particular use. 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.	Not necessary – wording to be included within policy wording Necessary to provide clarity and effectiveness, modified text to signpost to neighbourhood parades as defined in the policies map

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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. 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	**Policy DM7 – <u>Loss of</u> Employment Land** 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.~~ ~~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~~	Title modified, supporting text be modified to clarify it is specific to non-strategic employment sites outside of Longmead/Kiln Lane Deletion necessary to remove any unnecessary duplication from another policy Necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~class, including vehicle sales and repairs, builders' merchants and trade counters.~~ ~~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.~~ ~~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 intensification of these sites to provide modern floorspace for employment generating uses.~~ 6.28. Policy S9 defines the boroughs strategic employment sites, which are safeguarded for employment generating uses. However, there are a wide range of ~~E~~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. **Policy DM7: Loss of Employment Land** ~~**Strategic Employment Sites**~~	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~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.~~ ~~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.~~ **~~Outside of the Strategic Employment sites~~** ~~4)~~ 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: a) there are no strong economic reasons to retain the Employment Use; b) there is no reasonable prospect of the site being retained in employment use evidenced by at least 12 months of continuous marketing evidence; and c) the site is no longer suitable for its existing use or other employment uses.	Deletion necessary to remove any unnecessary duplication from another policy Added marketing period into the policy to ensure the policy is effective
MM72	97-98	Policy DM8	**Policy DM8 – ~~Racehorse Training Zone~~ Epsom Downs Racecourse and the Racehorse Training Industry**	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			6.31. The borough has 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. 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 economic viability and the local economy. The Racecourse Area is defined on the Policies Map. Surrounding the racecourse ~~itself (as defined on the Policies Map)~~ are the nationally important racehorse training grounds, located in Epsom and Walton Downs which make a positive contribution to the economy and sporting heritage of the area. 6.32. There are several racehorse training ~~facilities / stable complexes~~ yards in the b~~B~~orough (and neighbouring	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

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			boroughs) which are well-located to support the ongoing use of the training grounds. ~~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. The Racecourse Area and Racehorse Training Zone are located within the Green Belt. 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: • Enable the training of racehorses on the Downs until midday • Preserve the Downs in their natural state of beauty • Maintain public rights of access • Ensure that the various users respect each other's rights and the Down environment 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	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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. ~~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.~~ 6.33. 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 racehorse training yards, development should be designed in line with the British Horseracing Authority's requirements. *3 new paragraphs inserted following para 6.33*	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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. 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. ~~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.~~ ~~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.~~ **Policy DM8: ~~Racehorse Training Industry~~ Epsom Downs Racecourse and Racehorse Training Industry**	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			Racecourse Area 1) Within the extent of the racecourse area, as defined ~~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. This may include suitable non-racing development to support the long-term viability of the racecourse. **Racehorse Training Zone** 2) Within the Racehorse Training Zone, as defined ~~identified~~ on the Policies Map: a) Proposals which facilitate the long-term or future use of the site for the racehorse training industry and/or as a racehorse training yard ~~racing stable and/or for the racehorse training industry~~ will be supported, 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. b) Any proposals resulting in the loss of specific facilities which would support the long term or future use of the site as a racehorse training yard ~~racing stable~~ will be resisted.	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			c) 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: i) Marketing of the site for the horse racing sector has taken place for a period of at least 24~~18~~ months, at a reasonable market value with a recognised agent specializing in the racing sector property market; and, 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~~ **<u>Racehorse Movement Corridor</u>** 3) A~~ny~~ll proposal<u>s</u>, ~~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</u> the safety of racehorses travelling between <u>training yards and</u> the training grounds	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~and the racing stable yards~~ by virtue of the traffic generation from or the design of the development and provide mitigation where there is an impact. 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.	
MM73	99-100	Policy DM9	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.~~ which are well served by public transport, this includes proximity to rail stations or frequent bus services. ~~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.~~ **Policy DM9: Visitor Accommodation** 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 which are well served by public transport ~~where there is frequent and direct public transport to the town centre~~.	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

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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: 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 c) the accommodation will not result in an unacceptable level of noise and disturbance to nearby residents. 3) Planning permission will only be granted for proposals that result in the loss of visitor accommodation and other short stay accommodation when any of the following criteria are met: 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 b) evidence of non-viability is submitted.	Necessary for clarity and effectiveness to modify part 1 to clarify the locations where visitor accommodation will be granted 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

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM74	101-102	Policy S11	**S11 Design <u>and Heritage</u>** <u>7.1. High quality</u> d~~D~~esign is essential to retaining the borough's distinct sense of place, as stipulated in the plan's vision and strategic objectives. <u>In addition to</u> ~~As well as~~ <u>the appearance</u> 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. *Three new paragraphs to be inserted following para. 7.1* <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> <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</u>	Necessary changes made to align with national planning policy Necessary additions for effectiveness as Policy S13 Heritage will be deleted and combined with this policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			development is therefore key to how development integrates into its surroundings. 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. 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:~~ • ~~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.~~ 7.3. ~~The council is in a strong position to require good and efficient design from development. The viability~~	Deleted text as density standards moved to policy wording to ensure policy is positively prepared

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~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. 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. **S11 Design and Heritage** 1) ~~The design of development~~ The Council will require high quality and appropriate design from development of all scales (including extensions, alterations and conversions). Proposals should be appropriate in	Necessary for effectiveness and to ensure that the supporting text aligns with national policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			relation to the character, appearance and functioning of the built and natural environment by: ~~a) making efficient use of land; and~~ a) Optimising the potential of the site to accommodate an appropriate amount and mix of development b) being of appropriate use, scale, mass, proportion, detailing, material, layout and siting; and 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 d) respecting the scale, appearance, building lines and location of buildings, spaces and visual amenity of the surrounding area; and 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 f) creating a sense of place through provision of attractive soft landscaping and open space where appropriate; and	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

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			g) maximising opportunities for natural security through layout and design by incorporating secured by Design Standards; and h) demonstrating how the scheme has been developed in accordance with the principles set out in the National Model Design Code and ~~c)~~ i) maximising opportunities for integrating passive design principles, including orientation, glazing and shading. ~~d)~~ j) where appropriate, providing well structured, practical and attractive areas of soft landscaping and open space. 2) 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: i. Epsom Town Centre (as defined on the policies map) 80 dwellings per hectare 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 iii. The remaining urban area (as defined on the polices map) 40 dwellings per hectare	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			3) 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 **Key supporting documents** • National Model Design Code	Key supporting document added for consistency with other policies
MM75	103	Policy S12	**DM24 ~~S12~~ Amenity Protection** 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.~~ **DM24 ~~S12~~ Amenity Protection** 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~~: a) Have an acceptable impact on the living environment of occupiers of existing residential properties and / or	Changed from strategic to non-strategic policy as the policy does not meet the relevant tests of the Framework Removed text as now moved to policy wording to ensure it is effective Moved reference to separation distances from supporting text to ensure the policy is effective Changes made to the policy to ensure it is positively prepared, effective and

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			provide adequate living conditions for future occupiers of residential properties; and b) 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 c) ~~a)~~ Limit the loss of ~~privacy,~~ daylight, and sunlight; and d) ~~b~~) Mitigate the impacts of: i) N~~n~~oise, vibration, ~~light, heat, smell and airborne emissions consisting of~~ odour, fumes, ~~smoke, soot, ash,~~ dust and ~~grit; and~~ artificial light, and ~~c)~~ii) ~~activity levels and t~~Traffic movements to, from ~~generation~~; and within the site ~~d) security of property and personal safety.~~ **Key supporting documents** • National Model Design Code • Building Research Establishment - A Good Practice Guide for site layout planning for daylight and sunlight.	consistent with national policy Added key supporting documents added for effectiveness
MM76	104-105	Policy DM10	**Policy DM10 – Building Emissions and Energy Standards**	Title and policy name change-Amendment

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			Policy DM10: Building Emissions <u>and Energy</u> Standards 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: ~~a~~<u>i)</u> Space heating demand less than 30kWh/m2/annum ~~b~~<u>ii)</u> Total energy use less than 40kWh/m2/annum; and ~~c~~<u>iii)</u> 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.	necessary to ensure policy is effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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 of the proposed buildings, and/or the provision of on-site renewable and low-carbon technologies.	
MM77	106	Policy DM11	7.17. The policy requires that new dwellings, as a minimum, meet the tighter Building Regulations optional water efficiency requirement of 110 litres per person per day or any increased standard that may be introduced in the future, this is a continuation of ~~current~~ previous policy in the borough. 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'. **Key supporting documents** • Approved Document G: sanitation, hit water safety and water efficiency	Necessary modifications supporting text to ensure policy is effective Modified to include Key document - consistent with other policies
MM78	107	Policy DM12	**Key supporting documents** • The Surrey Health and Well-Being Strategy • Surrey Health Impact Assessment Guidance Statement • Joint Strategic Needs Assessment (JSNA) contains a wealth of health data.	Modified to include Key document - consistent with other policies

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM79	108	Policy S13	~~**Policy S13 – Preserving identity of place with heritage**~~ ~~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.~~ ~~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.~~ ~~**Policy S13: Preserving identity of place with heritage**~~ ~~1) Development will be permitted where as far as possible, it enhances the borough's cultural, historic, architectural and townscape character.~~ ~~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.~~ ~~**Key supporting documents**~~	Policy deleted as matters adequately addressed by policy S11

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~• 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 <u>in line with the NPPF</u> ~~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 <u>6</u>~~5~~, guidance on proposals impacting Heritage Assets.	Necessary for effectiveness and to ensure the policy is positively prepared
MM81	111	Policy DM14	**Policy DM14: Shopfronts** 1) The design of new shopfronts and other commercial signage and the re-design of existing shopfronts and commercial signage should demonstrate: 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: <u>'</u>Shopfront Design Guide'<u></u> ~~or any future revisions to this document.~~	Deleted reference to future revisions to this document as policy wording not effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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).	
MM82	112	Policy DM15	**Policy DM15 – Green Belt** 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:~~ • ~~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.~~ 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.	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

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			Two new paragraphs inserted after para. 7.39. The Green Belt is very important to Epsom & Ewell as it: • positively contributes to the boroughs identity, character and appearance; • prevents coalescence with other settlements to the west, east and south; • 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, • 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, 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. 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:~~ ~~**Extensions or alterations**~~	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~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.~~ ~~**Replacement buildings**~~ ~~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.~~ 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. **Policy DM15: Green Belt** **Green Belt** ~~1) Development in the Green Belt will be considered inappropriate, and will not be permitted unless:~~	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~a) the development itself is an exception to the definition of "inappropriate" as defined by the National Planning Policy Framework; or~~ ~~b) there are very special circumstances to justify the inappropriate development.~~ ~~2) Very special circumstances are circumstances where other considerations clearly outweigh the harm to the Green Belt as a result of the development.~~ 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. **Replacement and Extension of Buildings in the Green Belt** 2) The Council will permit the replacement of a building in the Green Belt provided the new building: a) would be in the same use; and b) is not materially larger than the one it replaces; and 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	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			d) does not have a materially greater impact on the openness of the Green Belt. 3) The Council will permit the extension and alteration to a building in the Green Belt provided the additional development: a) is not disproportionate, over and above the size of the original building; and b) does not have a materially greater impact on the openness of the Green Belt. **Infill or redevelopment of previously developed land in the Green Belt** 4) The Council will permit limited infilling of previously development land in the Green Belt provided the development: a) does not have a materially greater impact on the openness of the Green Belt; or 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.	
MM83	115	Policy S14	*New paragraph after para. 7.49.* 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	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			takes place with regard to the habitats of great crested newts and assessment of impacts from proposed development.	Additional text necessary to ensure the policy is effective
			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.	Clarification the contribution made by blue infrastructure to ensure the policy is effective
			Policy S14: Biodiversity and Geodiversity 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: 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	Necessary modification part e to be positively prepared Amendment to clarify the importance of mitigation necessary for the policy to be positively prepared

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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>. 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. 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. **Key supporting documents** • Epsom and Ewell Biodiversity Action Plan (2020-2030) • Emerging Local Nature Recovery Strategy • <u>Water Framework Directive</u>	Additional supporting document for consistency and to ensure policy is positively prepared

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM84	117-118	Policy S15	**Policy ~~S15~~ DM25 – Biodiversity Net Gain** 7.53. This policy will require at least 10% BNG on qualifying development proposals and 20% BNG from seven greenfield site allocations SA33 -SA35 and SA48 -51 where the~~. This~~ higher requirement is detailed in the site allocation policy. 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 or on unallocated sites that lie outside the urban area as defined on the policies map) 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. ~~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~~ **Policy ~~S15~~DM25: Biodiversity Net Gain** 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 be achieved (unless a higher requirement has been specified in a site allocation policy or on unallocated	Modified the policy from strategic policy to development management policy Changes are necessary for clarity and effectiveness and to remove unnecessary duplication. Modified for effectiveness the site allocations outside the urban area require 20% BNG Remove supporting text as not justified Necessary for clarity and effectiveness Modified text to accord with national policy Criteria b and c modified for clarity

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			sites that lie outside the urban area as defined on the Policies Map). 2) Biodiversity net gain should be delivered using the following hierarchy (note this does not apply to irreplaceable habitats): a) On-site as part of the development which have a 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 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; ~~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~~	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~should align with and deliver the LNRS and preferably within BOAs.~~ 3) Biodiversity net gain will be secured by planning condition, legal agreement or a conservation covenant, as appropriate. **Key supporting documents** • 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 ~~M~~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	**Policy DM17: Trees, Woodlands and Hedgerows** Development proposals will be permitted where: a) they do not result in the loss of, or damage to, trees, woodlands and hedgerows that make a significant	Modified for clarity and effectiveness to signpost to relevant technical standards

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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 reasons ~~circumstances~~ and a suitable compensation strategy ~~appropriate planting~~ to mitigate the loss in biodiversity and natural asset is proposed 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). c) they make provision for new streets to be tree lined and new ~~street trees 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.	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 Modification to reflect national policy and Standing Advice from Natural England regarding buffers to ensure root protection
MM86	121-123	Policy S16	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 30~~20~~ year fluvial flood risk or greater (>3.3~~5~~ % Annual Exceedance Probability (AEP)~~, which is also as consistent as possible with most other Local Planning Authorities in Surrey.~~.	Necessary modification to correct the number of years from 20 to 30 year fluvial flood risk for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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. 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. 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~~. *Insert new paragraph after paragraph 7.70* 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	Necessary to ensure consistency with national policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			in accordance with the National Standards for Sustainable Drainage Systems. **Policy S16: Flood Risk and Sustainable Drainage** Development will be permitted where: 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), S~~sequential and subsequent exception tests have been passed in line with national policy and guidance. 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. 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).	Necessary modification on SuDs to align with national policy Necessary modifications to align with national policy

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			e) Finished floor levels are set 300mm above the climate change flood level ~~(~~as defined in the SFRA~~)~~. 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. 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. h) It does not result in the culverting of main rivers. 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. j) Sustainable drainage systems are installed which follow the drainage hierarchy of: i. storing rainwater for later re-use; ii. use infiltration techniques;	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			iii. attenuate rainwater in ponds or open water features for later gradual release; iv. discharge rainwater directly to a watercourse; v. discharge rainwater to a land drain, highway drain or surface water sewer; vi. discharge rainwater to a combined sewer. 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 **Key supporting documents** • 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~~ • ~~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~~	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~• Surrey County Council Preliminary Flood Risk Assessment 2011~~ • Surrey Local Flood Risk Management Strategy 2017 • Planning Practice Guidance – Flood Risk and Coastal Change ~~2022~~ • National standards for sustainable drainage systems (SuDS) 2025 ~~• 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	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).~~ Phasing conditions could be used where necessary to align the occupation of development with delivery of off-site infrastructure upgrades. 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. The loss of open space, social infrastructure and other community	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. Delete wording regarding funding which needs to be within the policy itself to be effective Modified to clarify that infrastructure provision could be phased for large development and aligned with

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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.~~ 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. **Policy S17: Infrastructure Delivery** 1) 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~~.	infrastructure upgrades to ensure the policy is justified. Additional clarification in relation to loss of specific infrastructure Delete last sentence from 8.5 for clarity to ensure an effective policy Changes are necessary for clarity and effectiveness and to remove unnecessary duplication. Text modified to clarify that the policy applies to certain

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			2) Infrastructure must be provided at the appropriate time, prior to the development becoming occupied or becoming operational. For ~~l~~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.~~ 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. 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.	types of development and that funding needs to be secured and what mechanisms will be used to secure it Additional clarification in relation to loss of specific infrastructure
MM88	128	Policy S18	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, footpaths and shared surfaces, green and sustainable drainage systems.	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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. *2 new paragraphs in-between para. 8.9 & 8.10:* 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. 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. **Policy S18: Green and Blue Infrastructure**	Text modified to clarify that future management arrangements should be secured to ensure the policy is effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~1.~~ Development will be supported provided that: 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; b) it protects and enhances the green and blue infrastructure network, through provision of appropriate green or blue infrastructure features ~~within the network~~; 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. c) any loss or adverse impacts on the green and blue infrastructure network are fully mitigated through the replacement / provision of green infrastructure of equivalent or better value on-site or, where feasible, through appropriate off-site compensatory measures; and d) where new green infrastructure is provided within new development, suitable arrangements are in place for its future funding, maintenance and management. This could be through seeking contributions from developers or through a site management company, where appropriate. ~~2) Development proposals that would result in the loss or harm of green and blue infrastructure will only be supported if an~~	Modified for effectiveness with additional text to clarify and emphasise the connectivity to the wider network beyond the site Modification to c) to make clear that loss should be replaced Modified for effectiveness for relevant supporting documents added including Natural England's GI Framework

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~appropriate replacement is provided that is of equivalent or better value in terms of quantity, quality, and accessibility~~ **Key Supporting Documents** • National Model Design Code • Natural England Green Infrastructure Framework • Surrey County Council Green and blue Infrastructure: best practice case studies • Natural England Green Infrastructure Framework	Relevant supporting documents added for consistency and to ensure the policy is positively prepared
MM89	129-131	Policy DM19	**Policy DM19 – Open Spaces, Outdoor Sport and Recreation** 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. 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 S~~U~~uDS. 8.13. The council's evidence base studies have found that generally there is a good range of accessible public open space~~s , 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	Modified to clarify that the policy applies to outdoor sports and moved reference to indoor facilities to DM20 to ensure consistency with national policy Other modifications for clarity and effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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. 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. 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). 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 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~~. 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.	

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			8.16. Where appropriate, ~~A~~all new development is expected to contribute towards the provision/maintenance (~~and where appropriate, maintenance~~) of infrastructure, which includes open spaces, sports and recreational facilities. **Policy DM19: Open Spaces, Outdoor Sport and Recreation** 1) Proposals which complement and enhance the value and use of open spaces for recreation, biodiversity and/or nature conservation and climate change adaptation/mitigation will be considered favourably. 2) Proposals for new and improved, refurbished, replacement or extended outdoor sports/facilities ~~indoor~~ and ancillary buildings ~~built sport and recreational facilities~~ must be of high quality, and optimise accessibility to all users and where appropriate, maximise wider community benefit through the utilisation of measures such as community use agreements. 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~~ this provision in perpetuity.	Modified to clarify that the policy applies to outdoor sports For conciseness, substituted open space with provision in criteria 3, removed reference to audit in criteria 3 in order to future proof the policy. Changes made to ensure the policy is consistent with national policy and effective

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			4) Provision standards should be ~~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.~~ 5) Proposals which result in a loss of open space and/or outdoor sport and recreational buildings/land will only be considered where supported by robust evidence and will be assessed in line with national policy. 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. **Key Supporting Documents** • Open Space Audit (2024) • Playing Pitch Strategy (2021) • Sports Facilities Assessment (2020) • Epsom and Ewell Infrastructure Delivery Plan	Title for supporting documents amended and additional document added for consistency

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM90	132-133	Policy DM20	**Policy DM20 – <u>Social Infrastructure and</u> Community ~~and Cultural~~ Facilities** <u>8.20. Social infrastructure and</u> ~~C~~<u>c</u>ommunity ~~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. <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.</u> ~~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.~~ *New paragraph in-between para. 8.21 and 8.22* <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>	Modified title for clarity and effectiveness 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 Modified text for effectiveness to promote reuse and maximising use of existing facilities.

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			8.22. New provision should be located in sustainable locations, ensuring good accessibility by a wide range of travel modes. Buildings and facilities should be flexible and adaptable. Where appropriate Community Use Agreements (CUA) will be sought to achieve wider community use of facilities. 8.23. The council will require any loss to be fully justified, with marketing undertaken in accordance with the requirements of Appendix 5~~.~~, 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. ~~.~~ **Policy DM20: Social Infrastructure and Community ~~and Cultural~~ Facilities** 1) Planning permission will be permitted for new or extensions/enhancements to existing community and cultural facilities provided that: a) there is a demonstrable identified need; b) it is in a location that is well served by public transport and accessible by walking and cycling; ~~and~~ c) it is delivered in flexible and adaptable building/s which could accommodate other social infrastructure/community	Additional text to promote community use agreements for wider community use to ensure policy is effective in this regard Modified text for clarity and effectiveness Social Infrastructure and Community facilities have been defined in the glossary Additional text to promote community use agreements for wider community use

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			uses where practicable, to encourage efficient use of land through mixed use and increased public access~~.~~; and d) where possible, It seeks to maximise wider community benefit through the utilisation of measures such as community use agreements. 2) The council will only support the loss of existing community and cultural facilities where: 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 b) it has been vacant and actively marketed for a community use without success for at least 18 months; or c) it can be re-provided to an equivalent standard elsewhere within the borough or provision can be delivered in a different way. **Key supporting documents** • Epsom and Ewell Infrastructure Delivery Plan • Sports Facilities Assessment (2020)	Added Sports Facilities Assessment under key supporting documents Changes made to ensure policy is positively prepared and effective
MM91	133	Policy DM21	~~**Policy DM21 – Education Infrastructure**~~	Deleted

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~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.~~ ~~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.~~ ~~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.~~ ~~8.28. The council will support investment in the existing educational infrastructure to ensure facilities continue to support changing needs and demands.~~ ~~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.~~ ~~**Policy DM21: Education Infrastructure**~~	Policy not necessary as covered by policy DM20, remove to avoid duplication.

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			~~1) Development proposals for the intensification and enhancement of established education facilities in the borough will be supported.~~ ~~2) Proposals which maximise the extended or multiple use of educational facilities for community or recreational use will be supported.~~ ~~**Key supporting documents**~~ ~~• Epsom and Ewell Infrastructure Delivery Plan~~	
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 and Kenley Aerodrome, 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. 8.40. The aerodrome safeguarding area extends to cover a zone broadly within 55~~30~~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.	Modification to the supporting text to include Kenley Aerodrome recommended by Defence Infrastructure Organisation Amended safeguarding zone from 30km to 55km as recommended by Gatwick Airport

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<table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
<tr><td>Net additional dwelling completions</td><td>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 386 dwellings per annum for years 5 to 18 (2026/27 – 2039/40)

Plan target – delivery of at least ~~4,700~~ 6,012 dwellings over the plan period (2022-2040)</td><td>Planning decisions and appeals

Monitoring data</td></tr>
<tr><td>~~Annual~~ Net delivery of Gypsy pitches permitted and completed</td><td>at least ~~1~~80 pitches over the Local Plan period ~~(as per need identified in the GTAA)~~</td><td>Planning decisions and appeals that deliver additional gypsy and traveller pitches

Monitoring data</td></tr>
</table>
</td><td>Modified to reflect increased housing supply and trajectory.

Necessary for effectiveness</td></tr>
</table>

Ref	Page(s)	Policy Number/paragraph number	Main modification			Reason for modification
			~~The amount of~~ net employment floorspace ~~permitted and completed each year~~	Plan target - at least 41,464 sqm of additional employment floorspace ~~Assess trends against identified needs in the HEDNA~~	Planning decisions and appeals that result in a loss or gain in employment floorspace Monitoring data CoStar platform or similar real estate information company at local plan review stage	
			~~The amount of net~~ Change in retail floorspace ~~permitted and completed each year~~	No specific target ~~Assess trends against identified needs in the retail study~~	Planning decisions and appeals that result in a net loss of retail floorspace Monitoring data	
MM94	139	Policy S2	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness

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<tr><td></td><td></td><td></td><td>
<table>
<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 requirements following a viability review.</td><td><u>No specific targets</u> ~~n/a~~</td><td>Planning applications and appeals</td></tr>
</table>
</td><td></td></tr>
<tr><td>MM95</td><td>140</td><td>Policy S3</td><td>
<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>
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</td><td>Necessary for effectiveness</td></tr>
<tr><td>MM96</td><td>140</td><td>Policy S4</td><td></td><td>Necessary for effectiveness</td></tr>
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<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>
<tr><td><u>Implementation of proposals set out within the Local Cycling and Walking infrastructure Plan</u></td><td><u>Priority schemes delivered over the Local Plan period.</u></td><td><u>Infrastructure Delivery Plan</u></td></tr>
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</td><td></td></tr>
<tr><td>MM97</td><td>140</td><td>Site Allocation-SA1 to SA35</td><td>
<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>
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Text not justified</td></tr>
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<tr><th>Ref</th><th>Page(s)</th><th>Policy Number/paragraph number</th><th>Main modification</th><th>Reason for modification</th></tr>
<tr><td>MM98</td><td></td><td>SA1 Southern Gas Network Site</td><td>
<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>
</td><td>Necessary for effectiveness</td></tr>
<tr><td>MM99</td><td></td><td>SA2 Hook Road Car Park</td><td>
<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>
</td><td>Necessary for effectiveness</td></tr>
<tr><td>MM100</td><td></td><td>SA3 Solis House, 20 Hook Road</td><td>
<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 2030 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u>

<u>Monitoring data</u></td></tr>
</table>
</td><td>Necessary for effectiveness</td></tr>
<tr><td>MM101</td><td></td><td>SA4 Bunzl, Hook Road</td><td></td><td>Necessary for effectiveness</td></tr>
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			Indicators: Delivery of at least 35 dwellings Annual Target / Plan Period Target: Delivery of development by 2027 in accordance with the trajectory Data source: Planning appeals and decisions; Monitoring data	
MM102		SA5 Epsom Town Hall	Indicators: Delivery of at least 90 dwellings Annual Target / Plan Period Target: Delivery of development by 2029 in accordance with the trajectory Data source: Planning appeals and decisions; Monitoring data	Necessary for effectiveness
MM103		SA6 Hope Lodge Car Park	Indicators: Delivery of at least 30 dwellings Annual Target / Plan Period Target: Delivery of development by 2032 in accordance with the trajectory Data source: Planning appeals and decisions; Monitoring data	Necessary for effectiveness
MM104		SA7 Former Police and Ambulance Station Site	Indicators: Delivery of at least 85 residential, Annual Target / Plan Period Target: Delivery of development by 2028 in Data source: Planning appeals and decisions	Necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			nursing and dementia care bedrooms for the elderly / accordance with the trajectory / Monitoring data	
MM105		SA8 Epsom Clinic	Indicators: Delivery of at least 30 dwellings / Annual Target / Plan Period Target: Delivery of development by 2029 in accordance with the trajectory / Data source: Planning appeals and decisions; Monitoring data	Necessary for effectiveness
MM106		SA9 Depot Road and Upper High Street Car Park	Indicators: Delivery of at least 100 dwellings and public car parking / Annual Target / Plan Period Target: Delivery of development by 2032 in accordance with the trajectory / Data source: Planning appeals and decisions; Monitoring data	Necessary for effectiveness
MM107		SA10 79-85 East Street	Indicators: Delivery of at least 34 dwellings / Annual Target / Plan Period Target: Delivery of development by 2029 in accordance with the trajectory / Data source: Planning appeals and decisions; Monitoring data	Necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM108		SA11 Finachem House	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td>Delivery of purpose built student accommodation to provide at least 90 student bedrooms or a scheme of at least 35 dwellings.</td><td>Delivery of development by 2029 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness
MM109		SA12 Global House	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td>Delivery of at least 75 dwellings</td><td>Delivery of development by 2030 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness
MM110		SA13 Swail House	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td>Refurbishment of Swail house to provide at least 45 dwellings</td><td>Delivery of development by 2028 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			The construction of at least 45 specialist accommodation dwellings for the Royal National Institute of Blind People (RNIB)	
MM111		SA14 60 East Street	Indicators: Delivery of at least 30 dwellings; Annual Target / Plan Period Target: Delivery of development by 2027 in accordance with the trajectory; Data source: Planning appeals and decisions; Monitoring data	Necessary for effectiveness
MM112		SA15 Corner of Kiln Lane and East Street (101b East Street)	Indicators: Delivery of at least 5 dwellings; Annual Target / Plan Period Target: Delivery of development by 2029 in accordance with the trajectory; Data source: Planning appeals and decisions; Monitoring data	Necessary for effectiveness
MM113		SA16 Land at Kiln Lane	Indicators: Delivery of at least 40 dwellings; Annual Target / Plan Period Target: Delivery of development by; Data source: Planning appeals and decisions	Necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<table><tr><td></td><td>2035 in accordance with the trajectory</td><td>Monitoring data</td></tr></table>	
MM114		SA17 Hatch Furlong Nursery	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of at least 30 dwellings</td><td>Delivery of development by 2031 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness
MM115		SA18 Land to the rear of Rowe Hall	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of an extra care accommodation to provide at least 96 self contained apartments, staff and communal facilities</td><td>Delivery of development by 2029 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness
MM116		SA19 7 Station Approach	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of at least 8 dwellings</td><td>Delivery of development by 2028 in</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			accordance with the trajectory	
MM117		SA20 Esso Express, 26 Reigate Road	Indicators: Delivery of at least 10 dwellings Annual Target / Plan Period Target: Delivery of development by 2029 in accordance with the trajectory Data source: Planning appeals and decisions; Monitoring data	Necessary for effectiveness
MM118		SA21 Richards Fields Car Park	Indicators: Delivery of at least 7 dwellings Annual Target / Plan Period Target: Delivery of development by 2030 in accordance with the trajectory Data source: Planning appeals and decisions; Monitoring data	Necessary for effectiveness
MM119		SA22 Etwelle House, Station Road	Indicators: Delivery of at least 20 dwellings Annual Target / Plan Period Target: Delivery of development by 2028 in accordance with the trajectory Data source: Planning appeals and decisions; Monitoring data	Necessary for effectiveness
MM120		SA24 Garages at Somerset Close	Indicators Annual Target / Plan Period Target Data source	Necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
		and Westmorland Close	<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	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
MM122		SA26 35 Alexandra Road	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
MM123		SA27 22-24 Dorking Road	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>	Necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM124		SA28 63 Dorking Road	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of at least 6 dwellings</td><td>Delivery of development by 2029 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness
MM125		SA30 Epsom General Hospital	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of at least 305 units if older people's accommodation Delivery of at least 24 key worker dwellings</td><td>Delivery of development by 2029</td><td>Planning appeals and decisions Monitoring data</td></tr><tr><td></td><td></td><td></td></tr></table>	Necessary for effectiveness
MM126		SA31 Land at West Park Hospital (South)	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of at least 50 dwellings</td><td>Delivery of development by 2029 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
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>	Necessary for effectiveness
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>	Necessary for effectiveness
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></td></tr></table>	Necessary for effectiveness

<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy Number/paragraph number</th><th>Main modification</th><th>Reason for modification</th></tr>
<tr><td></td><td></td><td></td><td><table><tr><td></td><td></td><td>Infrastructure Delivery Plan</td></tr></table></td><td></td></tr>
<tr><td>MM130</td><td></td><td>SA35 Land at Horton Farm</td><td><table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
<tr><td>Delivery of at least 1,250 dwellings including some specialist accommodation</td><td>Delivery of development by 2040 in accordance with the trajectory</td><td>Planning appeals and decisions

Monitoring data

Infrastructure Delivery Plan</td></tr>
<tr><td>Delivery of at least 10 gypsy and traveller pitches</td><td>Delivery by 2035</td><td>Planning appeals and decisions

Monitoring data</td></tr>
<tr><td>Delivery of community building</td><td>Delivery by 2035</td><td>Planning appeals and decisions

Monitoring data

Infrastructure Delivery Plan</td></tr>
<tr><td>Delivery of a public park of approximately 7ha</td><td>Delivery by 2035</td><td>Planning appeals and decisions

Monitoring data

Infrastructure Delivery Plan</td></tr>
</table></td><td>Necessary for effectiveness</td></tr>
</table>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
MM131		SA36 25 Alexandra Road Epsom	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of at least 11 dwellings</td><td>Delivery of development by 2036 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness
MM132		SA37 Gainsborough Road Estate	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of at least 8 dwellings</td><td>Delivery of development by 2032 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness
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>Delivery of at least 6 dwellings</td><td>Delivery of development by 2031 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness
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>Delivery of at least 6 dwellings</td><td>Delivery of development by</td><td>Planning appeals and decisions</td></tr></table>	Necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			2037 in accordance with the trajectory / Monitoring data	
MM135		SA40 Land west of Ewell By-Pass	Indicators: Delivery of at least 38 dwellings; Annual Target / Plan Period Target: Delivery of development by 2040 in accordance with the trajectory; Data source: Planning appeals and decisions, Monitoring data	Necessary for effectiveness
MM136		SA41 Conservative Club, Epsom Club and Church	Indicators: Delivery of at least 28 dwellings; Annual Target / Plan Period Target: Delivery of development by 2038 in accordance with the trajectory; Data source: Planning appeals and decisions, Monitoring data	Necessary for effectiveness
MM137		SA42 TK Maxx	Indicators: Delivery of at least 17 dwellings; Annual Target / Plan Period Target: Delivery of development by 2039 in accordance with the trajectory; Data source: Planning appeals and decisions, Monitoring data	Necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
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>Delivery of at least 11 dwellings</td><td>Delivery of development by 2037 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness
MM139		SA44 Spread Eagle	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of at least 22 dwellings</td><td>Delivery of development by 2040 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness
MM140		SA45 Auction House	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of at least 10 dwellings</td><td>Delivery of development by 2040 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness
MM141		SA46 Laine Theatre Arts	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of at least 6 dwellings</td><td>Delivery of development by</td><td>Planning appeals and decisions</td></tr></table>	Necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			<table><tr><td></td><td>2033 in accordance with the trajectory</td><td>Monitoring data</td></tr></table>	
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>Delivery of at least 23 dwellings</td><td>Delivery of development by 2036 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness
MM143		SA48 Cuddington Glade	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of a 70 bed Care Home</td><td>Delivery of development by 2029 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness
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>Delivery of at least 50 dwellings</td><td>Delivery of development by 2032 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	Necessary for effectiveness
MM145		SA50 Land at Priest Hill		Necessary for effectiveness

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<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
<tr><td>Delivery of at least 275 dwellings</td><td>Delivery of development by 2032 in accordance with the trajectory</td><td>Planning appeals and decisions

Monitoring data</td></tr>
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</td><td></td></tr>
<tr><td>MM146</td><td></td><td>SA51 Downs Farm</td><td>
<table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
<tr><td>Delivery of at least 530 dwellings</td><td>Delivery of development by 2035 in accordance with the trajectory</td><td>Planning appeals and decisions

Monitoring data</td></tr>
<tr><td>Delivery of a new specialist school of up to 2.5ha</td><td>Delivery of development by 2035 in accordance with the trajectory</td><td>Planning appeals and decisions

Monitoring data</td></tr>
</table>
</td><td>Necessary for effectiveness</td></tr>
<tr><td>MM147</td><td>140</td><td>Policy S5 Housing Mix and Type</td><td>
<table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
<tr><td>~~Annual~~ Cumulative housing mix ~~delivery (and cumulatively over the plan period)~~</td><td>Approximate proportions:
1 bed – 10%
2 bed – 35%
3 bed – 35%
4 bed – 20%</td><td>Planning appeals and decisions

Monitoring data</td></tr>
</table>
</td><td>Necessary for effectiveness</td></tr>
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<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy Number/paragraph number</th><th>Main modification</th><th>Reason for modification</th></tr>
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<table>
<tr><td>for market housing</td><td></td><td></td></tr>
<tr><td><s>Annual</s> Cumulative housing mix <s>delivery (and cumulatively over the plan period)</s> affordable home ownership</td><td>Approximate proportions:
1 bed – 20%
2 bed – 40%
3 bed – 30%
4 bed – 10%</td><td>Planning appeals and decisions

Monitoring data</td></tr>
<tr><td><s>Annual</s> Cumulative housing mix <s>delivery (and cumulatively over the plan period)</s> affordable housing (rented)</td><td>Approximate proportions:
1 bed – 10%
2 bed – 35%
3 bed – 35%
4 bed – 20%</td><td>Planning appeals and decisions

Monitoring data</td></tr>
</table>
</td><td></td></tr>
<tr><td>MM148</td><td>141</td><td>Policy S6 Affordable housing</td><td>
<table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
<tr><td>Number of affordable dwellings granted consent</td><td>Approx <s>1250</s> 1675 over Local Plan Period</td><td>Planning decisions and appeals

Authority Monitoring Report</td></tr>
<tr><td>Number of planning decisions</td><td>n/a</td><td>Planning decisions and appeals</td></tr>
</table>
</td><td>Amended affordable housing target to a minimum, reflecting additional Green Belt allocations.

Necessary for effectiveness</td></tr>
</table>

<table>
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<tr><td></td><td></td><td></td><td>
<table>
<tr><td>~~including appeals allowing a lower level of affordable provision than set out in the policy.not compliant with policy S6.~~</td><td></td><td></td></tr>
<tr><td>Number of affordable home completions (and as a % of total net completions)</td><td>n/a</td><td>Planning decisions and appeals Authority Monitoring Report</td></tr>
<tr><td>Number of households on the Housing Register</td><td>Reducing over the plan period</td><td>Housing register</td></tr>
</table>
</td><td></td></tr>
<tr><td>MM149</td><td>142</td><td>Policy S7 Specialist housing</td><td>
<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 specialist accommodation</td><td>In line with site allocations and all other proposals consistent with the requirements of policy S7.</td><td>Planning appeals and decisions

<u>Authority Monitoring Report</u></td></tr>
<tr><td>Number of specialist dwellings lost</td><td>No net loss of plan period.</td><td>Planning appeals and decisions</td></tr>
</table>
</td><td>Necessary for effectiveness</td></tr>
</table>

<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy Number/paragraph number</th><th>Main modification</th><th>Reason for modification</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td></td><td></td><td>Authority Monitoring Report</td></tr>
<tr><td>Number of additional specialist dwellings and bedrooms</td><td>~~n/a~~ Increase in specialist accommodation over the plan period to assist in meeting identified needs

Elderly and Extra Care

Student accommodation</td><td>Completions, planning appeals and decisions

Authority Monitoring Report</td></tr>
</table>
</td><td></td></tr>
<tr><td>MM150</td><td>143</td><td>Policy S8 Gypsies, Travellers and Travelling Showpeople</td><td>
<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>
</table>
</td><td>Necessary for effectiveness</td></tr>
</table>

<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy Number/paragraph number</th><th>Main modification</th><th>Reason for modification</th></tr>
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<tr><td>MM151</td><td>143</td><td>Policy S9 Economic Development</td><td>
<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>
<tr><td>Increase in floorspace in economic use at the Strategic Employment Sites</td><td>34,500sqm of additional floorspace to be delivered on strategic employment sites across the plan period</td><td>Planning decisions and appeals</td></tr>
<tr><td><s>Loss of floorspace in economic use outside of the Strategic Employment Sites</s></td><td><s>Assess trends</s></td><td><s>Planning decisions and appeals</s></td></tr>
<tr><td><u>Loss/gain of floorspace and land in use by the racecourse and</u></td><td><u>No net loss over plan period.</u></td><td><u>Planning decisions and appeals</u></td></tr>
</table>
</td><td>Necessary for effectiveness</td></tr>
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<tr><th>Ref</th><th>Page(s)</th><th>Policy Number/paragraph number</th><th>Main modification</th><th>Reason for modification</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td><u>racehorse training sector</u></td><td></td><td><u>Authority Monitoring Report</u></td></tr>
<tr><td><u>Loss/gain of floorspace and land in use the creative and cultural sector and further and higher education providers</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>
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</td><td></td></tr>
<tr><td>MM152</td><td>143</td><td>Policy S10 Retail Hierarchy and Network</td><td>
<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 main town centre uses outside of the centres</td><td><s>Assess trends</s> <u>No specific target. Monitoring Only</u></td><td>Planning decisions and appeals</td></tr>
</table>
</td><td>Necessary for effectiveness</td></tr>
<tr><td>MM153</td><td>143</td><td>Policy DM4 Primary Shopping Areas and Retail Frontages</td><td>
<table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
<tr><td>Planning permissions approved in the town centre for</td><td><s>Assess trends</s> <u>No specific target. Monitoring Only</u></td><td>Planning decisions and appeals</td></tr>
</table>
</td><td>Necessary for effectiveness</td></tr>
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<tr><th>Ref</th><th>Page(s)</th><th>Policy Number/paragraph number</th><th>Main modification</th><th>Reason for modification</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>appropriate town centre uses (as defined in the NPPF)</td><td></td><td></td></tr>
</table>
</td><td></td></tr>
<tr><td>MM154</td><td>143</td><td>Policy DM5 Edge of Centre or Out of Centre Proposals</td><td>
<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 main town centre uses outside of the centres</td><td><s>Assess trends</s> <u>No specific target. Monitoring Only</u></td><td>Planning decisions and appeals</td></tr>
</table>
</td><td>Necessary for effectiveness</td></tr>
<tr><td>MM155</td><td>144</td><td>Policy DM6 Edge of Centre or Out of Centre Proposals</td><td>
<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><s>Assess trends</s> <u>No specific target. Monitoring Only</u></td><td>Planning decisions and appeals</td></tr>
</table>
</td><td>Necessary for effectiveness</td></tr>
<tr><td>MM156</td><td>144</td><td>Policy DM7 Loss of Employment Land</td><td>Policy DM7 <u>Loss</u> of Employment Land
<table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
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</td><td>Necessary for effectiveness</td></tr>
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<tr><th>Ref</th><th>Page(s)</th><th>Policy Number/paragraph number</th><th>Main modification</th><th>Reason for modification</th></tr>
<tr><td></td><td></td><td></td><td><table><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> <s>Assess trends</s></td><td>Planning decisions and appeals</td></tr></table></td><td></td></tr>
<tr><td>MM157</td><td>144</td><td>Policy DM8 Racehorse Training Zone</td><td>Policy DM8 <u>Epsom Downs Racecourse and the Racehorse Training Industry</u> <s>Racehorse Training Zone</s><table><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 <s>Racecourse</s> <u>Racehorse</u> Training Zone</td><td>No loss of land to non-racehorse training uses in the <s>Racecourse</s> <u>Racehorse</u> Training Zone</td><td>Planning decisions and appeals</td></tr></table></td><td>Title amended to reflect change.

Amended ‘Racecourse’ to ‘Racehorse’.

Necessary for effectiveness</td></tr>
<tr><td>MM158</td><td>144</td><td>Policy DM9 Visitor Accommodation</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Planning permissions or appeals granted for visitor accommodation (number of units and bedspaces)</td><td><u>No specific target. Monitoring only</u> <s>Assess trends</s></td><td>Planning decisions and appeals</td></tr></table></td><td>Necessary for effectiveness</td></tr>
</table>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			Planning permissions or appeals granted for the loss of visitor accommodation (number of units and bedspaces) | No specific target. Monitoring only ~~Assess trends~~ | Planning decisions and appeals	
MM159	145	Policy S11 Design	Policy S11 Design and Heritage Indicators | Annual Target / Plan Period Target | Data source Planning permissions refused based on the policy | No specific target. Monitoring Only ~~Assess trends~~ | Planning decisions and appeals	Necessary for effectiveness
MM160	145	Policy S12 Amenity Protection	Policy ~~S12~~ DM24 Amenity Protection Indicators | Annual Target / Plan Period Target | Data source Planning permissions refused based on the policy | No specific target. Monitoring Only ~~Assess trends~~ | Planning decisions and appeals	Title change to reflect the policy Necessary for effectiveness
MM161	145	Policy DM10 Building Emissions Standards	Policy DM10 Building Emissions and Energy Standards Indicators | Annual Target / Plan Period Target | Data source Planning permissions for residential use ~~approved~~ | All residential planning applications ~~relevant planning~~ | Planning decisions and appeals	Title change & additional indicator Necessary for effectiveness

<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy Number/paragraph number</th><th>Main modification</th><th>Reason for modification</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>supported by an appropriate Energy Assessment</td><td>~~applications are~~ accompanied by an Energy Assessment <u>demonstrating policy requirements can be met.</u></td><td></td></tr>
<tr><td><u>Planning permission for non residential developments achieving BREEAM Excellent or any equivalent new standard</u></td><td><u>All new non-residential developments achieving BREEAM Excellent or any equivalent new standard</u></td><td><u>Planning decisions and appeals</u></td></tr>
</table>
</td><td></td></tr>
<tr><td>MM162</td><td>146</td><td>Policy DM12 Health Impact Assessment</td><td>
<table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
<tr><td><u>Number of planning applications that include a health</u> ~~Planning permissions inclusion of an~~ impact assessment~~, if required.~~</td><td><u>All eligible applications to include a</u> ~~permissions include a~~ <u>health impact assessment,</u> ~~if required.~~

<u>No specific target, monitoring only.</u></td><td><u>Planning decisions and appeals</u>

<u>ONS Health Data</u></td></tr>
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</td><td>Necessary for effectiveness</td></tr>
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<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy Number/paragraph number</th><th>Main modification</th><th>Reason for modification</th></tr>
<tr><td>MM163</td><td>146</td><td>Policy S13 Preserving identity of place with heritage</td><td>~~Policy S13 Preserving identity of place with heritage~~<table><tr><td>~~Indicators~~</td><td>~~Annual Target / Plan Period Target~~</td><td>~~Data source~~</td></tr><tr><td>~~Net gain/loss of listed buildings~~</td><td>~~No loss of designated heritage assets~~</td><td>~~Planning decisions and appeals~~</td></tr><tr><td>~~Number of listed buildings at risk~~</td><td>~~No increase in number of Listed Buildings identified as at risk~~</td><td>~~Buildings at risk register~~</td></tr></table></td><td>Policy deleted, monitoring indicator no longer necessary</td></tr>
<tr><td>MM164</td><td>146</td><td>Policy DM13 Development Impacting Heritage Assets</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>~~Net gain/loss of~~ listed buildings</td><td>No loss of designated heritage assets</td><td>Planning decisions and appeals</td></tr><tr><td>Number of <u>nationally</u> listed buildings at risk</td><td>No loss of designated heritage assets</td><td>Planning decisions and appeals</td></tr></table></td><td>Necessary for effectiveness</td></tr>
<tr><td>MM165</td><td>146</td><td>Policy DM14 Shopfronts, new indicator</td><td><u>Policy DM14 Shopfronts</u><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Planning appeals where the council refused permission for shopfronts for being contrary to</u></td><td><u>No appeal decisions allowed relating to shopfront design.</u></td><td><u>Planning decisions and appeals</u></td></tr></table></td><td>Necessary for effectiveness</td></tr>
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<tr><th>Ref</th><th>Page(s)</th><th>Policy Number/paragraph number</th><th>Main modification</th><th>Reason for modification</th></tr>
<tr><td></td><td></td><td></td><td><u>the council's shopfront policy</u></td><td></td></tr>
<tr><td>MM166</td><td>146-147</td><td>Policy DM15 Green Belt</td><td><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, granting permission for inappropriate development in the Green Belt, where very special circumstances that outweigh harm have not otherwise been identified</td><td><s>Assess trends</s>
<u>No specific target, monitoring only</u></td><td>Planning decisions and appeals</td></tr></table></td><td>Necessary for effectiveness</td></tr>
<tr><td>MM167</td><td></td><td>Policy DM16 Landscape Character (New indicator under DM15)</td><td><u>Policy DM16 Landscape Character</u><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></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></td><td>Necessary for effectiveness</td></tr>
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<tr><th>Ref</th><th>Page(s)</th><th>Policy Number/paragraph number</th><th>Main modification</th><th>Reason for modification</th></tr>
<tr><td>MM168</td><td>147</td><td>Policy S14 Biodiversity and Geodiversity</td><td>
<table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
<tr><td>Condition status of SSSIs</td><td><u>No Specific Target</u> Improvements to condition of SSSIs in line with targets in Local Nature Recovery Strategy</td><td>Site surveys</td></tr>
<tr><td>Condition status of SNCI</td><td><u>No Specific Target</u> Improvements in condition status</td><td>Surveys and DEFRA returns</td></tr>
</table>
</td><td>Necessary for effectiveness</td></tr>
<tr><td>MM169</td><td>147</td><td>Policy ~~S15~~ <u>DM25</u>– Biodiversity Net Gain</td><td>
<table>
<tr><td>Indicators</td><td>Annual Target/Plan Period Target</td><td>Data source</td></tr>
<tr><td>Percentage of major planning applications delivering ~~at least 10%~~ biodiversity net gain</td><td>All qualifying development obligated to achieving at least 10% biodiversity net gain or 20% where specified in ~~a site allocation~~ policy</td><td>Planning decisions and appeals</td></tr>
</table>
</td><td></td></tr>
<tr><td>MM170</td><td>147</td><td>Policy DM17 Trees, Woodlands and Hedgerows</td><td>
<table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
<tr><td>New development proposals including landscape plans</td><td>All ~~relevant~~ <u>qualifying</u> planning applications to</td><td>Surveys and DEFRA returns</td></tr>
</table>
</td><td>Necessary for effectiveness</td></tr>
</table>

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			include appropriate landscape plans	
MM171	147	Policy S16 Flood Risk and Sustainable Drainage	Indicators: Number of planning permissions granted contrary to Environment Agency advice on flooding and water grounds Annual Target / Plan Period Target: No specific target. Number of planning applications permitted or appeals allowed contrary to advice of the Environment Agency Data source: Planning decisions and appeals	Necessary for effectiveness
MM172	148	Policy DM18 Pollution and Contamination	Indicators: Number of planning decisions including appeals allowing development that is not in accordance with this policy Annual Target / Plan Period Target: No specific target. Number of relevant planning applications that are not in accordance with the policy Data source: Planning decisions and appeals	Necessary for effectiveness
MM173	148	Policy S17 Infrastructure		Necessary for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification			Reason for modification
		Delivery (additional indicator)	Indicators	Annual Target / Plan Period Target	Data source	
			Delivery of infrastructure schemes identified in the IDP as being delivered in years 1-5	Delivery of infrastructure achieved within anticipated timeframe.	Infrastructure Delivery Plan 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	

Ref	Page(s)	Policy Number/paragraph number	Main modification			Reason for modification
					Authority Monitoring Report	
			Local Cycling and Walking Infrastructure Plan (LCWIP) and Local Street Improvements (LSI).	No specific target. Priority LCWIP and LSI projects progressed over the Local Plan period.	Infrastructure Delivery Plan Authority Monitoring Report	
			Primary care facility at Horton Farm (SA35) or an equivalent financial contribution towards off-site provision of new or improvement to existing health facilities	Estimated delivery date 2032 to 2037.	Planning Applications Infrastructure Delivery Plan Authority Monitoring Report	
			GP practice extensions / redevelopment / reconfiguration as needed	No specific target. Improvements to be delivered over plan period dependent upon need.	Infrastructure Delivery Plan	

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<tr><th>Ref</th><th>Page(s)</th><th>Policy Number/paragraph number</th><th>Main modification</th><th>Reason for modification</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>New Sports Hub for the borough to include playing pitches (grass and artificial), a new pavilion and changing facilities. Provision at site allocation SA34</td><td>Estimated to be delivered between 2032 and 2037</td><td>Planning Applications

Infrastructure Delivery Plan

Authority Monitoring Report</td></tr>
</table>
</td><td></td></tr>
<tr><td>MM174</td><td>148</td><td>Policy S18 Green and Blue Infrastructure</td><td>
<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 that secure the provision of green infrastructure through new development</td><td>No specific targets. Monitoring only.~~Assess trends~~</td><td>Planning decisions and appeals</td></tr>
<tr><td>Number of planning decisions including appeals allowing the loss of existing green infrastructure</td><td>No net loss of existing green infrastructure</td><td>Planning decisions and appeals</td></tr>
</table>
</td><td>Necessary for effectiveness</td></tr>
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<tr><th>Ref</th><th>Page(s)</th><th>Policy Number/paragraph number</th><th>Main modification</th><th>Reason for modification</th></tr>
<tr><td>MM175</td><td>149</td><td>Policy DM19 Open Space, Sport and Recreation, second indicator</td><td>
<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 which create new or enhance open space or sport and recreational buildings/land</td><td><u>No specific targets. Monitoring only</u>.~~Assess trends~~</td><td>Planning decisions and appeals</td></tr>
</table>
</td><td>Necessary for effectiveness</td></tr>
<tr><td>MM176</td><td>149</td><td>Policy DM20 Community and Cultural Facilities</td><td>
<table>
<tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr>
<tr><td>Gains/losses of Use Class F1 and F2 facilities</td><td><u>No specific targets. Monitoring only</u>.~~Assess trends~~</td><td>Planning decisions and appeals</td></tr>
<tr><td>Developer contributions securing social and community infrastructure</td><td><u>No specific targets. Monitoring only</u>.~~Assess trends~~</td><td>Funding and space secured (authority monitoring report)</td></tr>
</table>
</td><td>Necessary for effectiveness</td></tr>
<tr><td>MM177</td><td>149</td><td>~~Policy DM21 Education Infrastructure~~</td><td>
<table>
<tr><th>~~Indicators~~</th><th>~~Annual Target / Plan Period Target~~</th><th>~~Data source~~</th></tr>
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</td><td>Policy deleted, indicator no longer necessary</td></tr>
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<tr><td></td><td></td><td></td><td>
<table>
<tr><td>~~Number of planning decisions including appeals allowing additional education floorspace~~</td><td>~~Assess trends~~</td><td>~~Planning decisions and appeals~~</td></tr>
</table>
</td><td></td></tr>
<tr><td>MM178</td><td>149</td><td>Policy S19 Transport</td><td>
<table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
<tr><td>~~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.</td><td>~~100% of qualifying developments~~
All qualifying developments</td><td>Planning ~~applications, appeal monitoring~~,decisions and appeals

Authority Monitoring Report</td></tr>
<tr><td>~~Use of sustainable travel modes~~</td><td>~~Increase in travel to work Modal share by sustainable~~</td><td>~~Census – every 10 years~~</td></tr>
</table>
</td><td>Necessary for effectiveness</td></tr>
</table>

Ref	Page(s)	Policy Number/paragraph number	Main modification			Reason for modification
				~~travel modes in 2031 Census over 2021 baseline.~~	~~SCC data on sustainable transport.~~	
			Number of car club vehicles and cycles available for public cycle rental schemes	No specific target. Monitoring only.	Planning decisions and appeals Authority Monitoring Report	
			Number of LCWIP priority schemes implemented	No specific target. Monitoring only.	Planning decisions and appeals Authority Monitoring Report	
			Number of car free developments implemented	No specific target. Monitoring only.	Planning decisions and appeals Authority Monitoring Report	
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, the voluntary sector, public service providers, places of worship and cultural facilities including theatres and arts centres.~~ **Social Infrastructure and Community Facilities:** Includes, but is not limited to, healthcare facilities, education facilities, childcare facilities childcare facilities, leisure centres/sports			Replaced 'Community Facilities' in the glossary with 'Social Infrastructure and Community Facilities.

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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. **District Licencing Scheme:** 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. **Essential Local Workers**: 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. **Green and Blue Infrastructure (GI)**: 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 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.~~	Additional entry in the Appendix to define District Licencing Scheme Essential local workers housing defined in the glossary which is captured under policy S5 Amended definition to be consistent with S18 New entry for effectiveness

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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 **Parking Stress**: The measure of the saturation levels of parking in a defined area and expressed in percentage terms. **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. **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. **Racehorse Movement Corridors**: Routes travelled by racehorses to and from training yards to access the racehorse training grounds. **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. **Social Infrastructure and Community Facilities**: Includes, but is not limited to, healthcare facilities, education facilities,	New entry necessary in relation to policy S11 New entry for effectiveness and consistency. Define Racehorse training terms in policy DM8 New entry for effectiveness and consistency, Social

Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			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. **Specialist Housing**: ~~H~~housing specifically designated to meet the identified needs of specialised groups, such as the elderly, disabled or student population ~~older people and people with support needs. It can include extra care housing~~.	Infrastructure and Community Facilities defined consistent with DM20 Modified to ensure effectiveness by using appropriate definition
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	The car parking standards identified in this appendix are maximums. In light of the above, there are likely to be situations where lower levels of parking ~~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	Policy DM8 – Racehorse Training Zone | Racehorse training industry ~~or equestrian~~ | ~~18~~ 24 months	Modifications for effectiveness and consistency with amended policy
MM183	185	Appendix 6: Guidance for Proposals Impacting Heritage Assets A6.2.1	**A6.2.1 Scheduled Ancient Monuments and Areas of High Archaeological Potential** The Borough contains two Scheduled Ancient Monuments (SAM) - the site of Nonsuch Palace and its associated remains, and St	Modification necessary for effectiveness

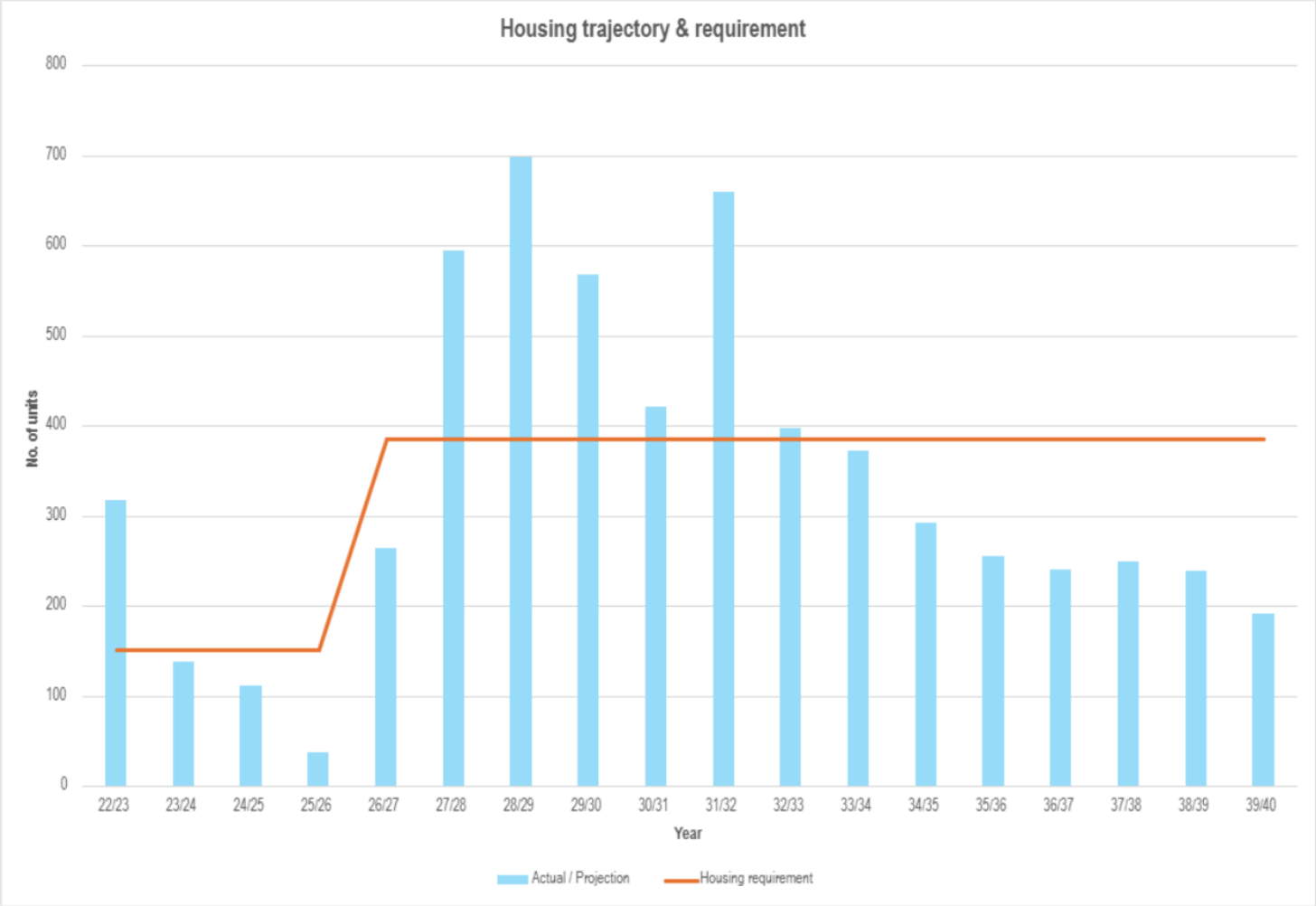
Ref	Page(s)	Policy Number/paragraph number	Main modification	Reason for modification
			Mary's Church Tower in Ewell. Additionally, there is one identified County Site of Archaeological Importance in the Borough - 'Diana's Dyke', a site close to Nonsuch Palace. All proposals will be expected to follow 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. Scheduled Monument Consents are determined by Historic England and not local authorities. 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 is inconclusive, or 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.	

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	~~150~~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

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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

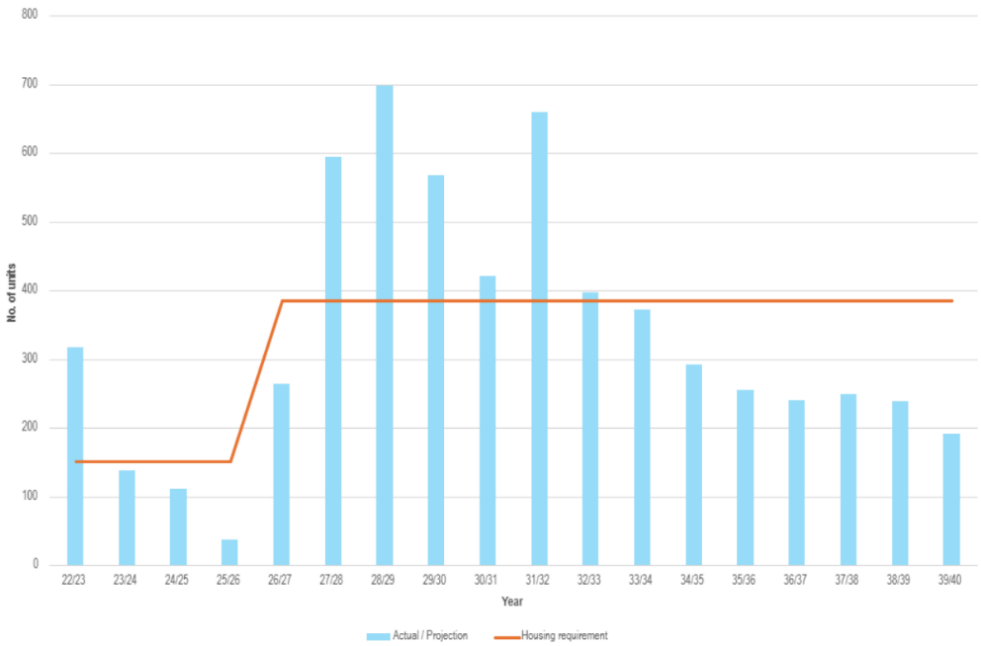
2.2.1 The proposal is now that the housing requirement over the plan period (2022/23 to 2039/40) should be set at 6,012 homes, or 334 dwellings per annum (dpa) on average. This compares to a requirement of 4,700 homes in the Submission Local Plan (261 dpa). For context, the housing requirement is the 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.

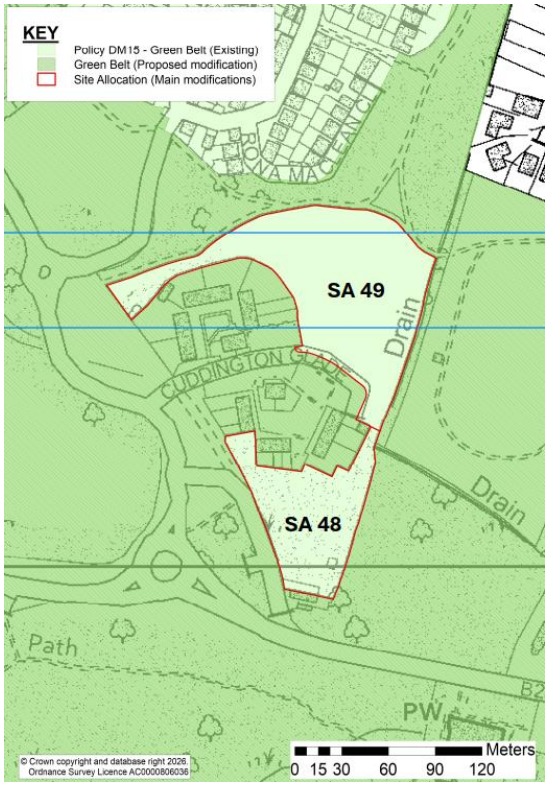
2.2.6 Focusing on the four new proposed Green Belt allocations, these are:[3]

- 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*

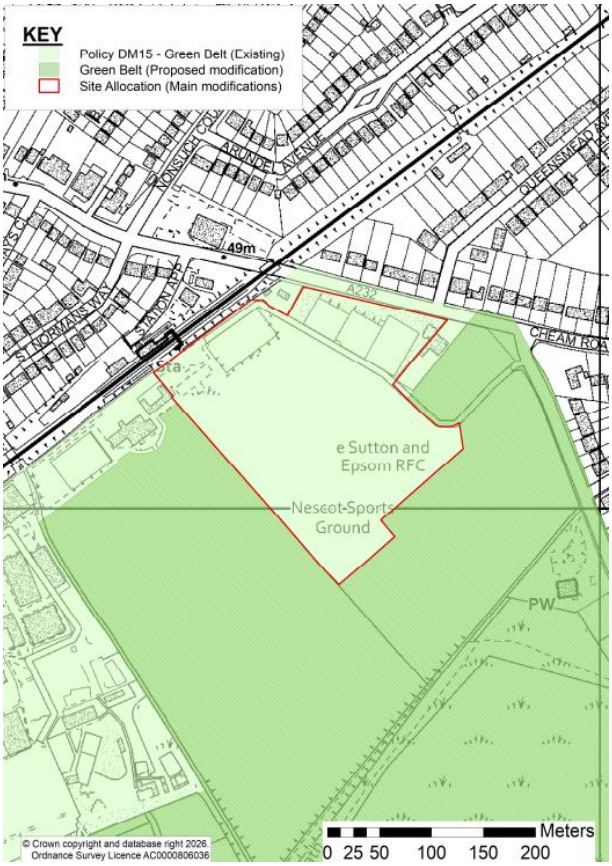


***Figure 2.3**: Proposed allocation SA51*

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

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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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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 Plan[1] 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 2025[2].

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 correspondence[3] 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 sites[10]. 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/gf2.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 2026[19]).

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 ~~strikethrough~~ 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.

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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	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' (identifiable by the policy starting with the prefix S), and 'site allocations' (identifiable by the policy starting with the prefix SA), 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. There are also detailed (non-strategic) policies called 'Development Management' policies, (identifiable by the policy starting with the prefix DM), 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. 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 41,464 sqm of additional employment floorspace (HEDNA, 2023).	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 Necessary to identify the employment needs in the borough over the plan period to ensure the plan is effective and positively prepared	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	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.	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.

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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?
			Vision ~~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.~~ 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. 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. Ewell Village and Stoneleigh Broadway centres will provide hubs for the communities they serve through convenience shopping and other commercial services and public services. 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	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?
			performing to its full economic potential, attracting new, and supporting existing businesses, from start-ups to larger companies. 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. ~~New development will have delivered a range of new homes of varying sizes, meeting the needs of our changing population including those in specialist housing need, and from students through to older people.~~ ~~New development will have been focused on urban sites, with the role of Epsom Town Centre of paramount importance having seen the most exciting and significant opportunities for growth.~~ ~~New vibrant communities with their own identities will be centred around previously underdeveloped transport hubs and principal movement corridors.~~ ~~The economy will be thriving, benefiting from high-speed digital infrastructure, and performing to its full economic potential, attracting new, and supporting existing businesses, from start-ups to larger companies.~~ ~~The Epsom Downs racecourse will continue to be a significant part of the borough's unique identity and support a thriving equestrian sector.~~		

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?
			~~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.~~ ~~New development here will have secured investment in wider public realm improvements, providing more trees to help to cool streets in the summer and provide a more attractive place and new habitat for birds and other wildlife. It will be a place where people naturally choose to walk and cycle to and around, because the surrounding environment is even more pleasant.~~ ~~The town centre will attract the best students and academic staff with modern facilities housing the University of Creative Arts and the Laine Theatre Arts School, who in turn contribute to the local economy. Graduates will have access to affordable space within the town centre to make and sell their creations, making Epsom Town Centre even more distinctive from other nearby centres.~~ ~~Ewell Village and Stoneleigh Broadway centres will continue to provide a distinct place identity and a hub for the community through convenience shopping and other commercial services such as professional services, restaurants, and public services like libraries. Infill and redevelopment opportunities will have been taken, increasing the number of residents served by these centres, helping to make them more viable in the longer term.~~		

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

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	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~~3,336~~ dwellings which when combined with completions, commitments and windfalls accounts for ~~(~~approximately 3~~5~~3% 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. 3.9. Through the allocation of ~~five~~ nine sites to be ~~inset~~ removed from the Green Belt, the council will be able to deliver an additional ~~1,580~~2,497 dwellings over the plan period, which combined with the urban area supply equates to approximately ~~48~~59% of the need established by the standard methodology. This is the council's preferred spatial strategy which balances social, economic and environmental objectives. 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 at least 41,464 sqm of additional employment floorspace in the area to meet the needs of existing businesses and to cater for new businesses. *New paragraphs in-between para. 3.13 and 3.14:*	Necessary to ensure plan reflects the correct numbers to ensure plan is justified and effective and consistency with national policy Necessary to clarify employment needs to ensure the plan is effective and positively prepared.	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.

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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 HEDNA employment modelling based on the baseline jobs growth scenarios forecasts over the Local Plan period a need for approximately: 13,000 sqm of office and R&D (E(g)(i)(ii)) floorspace 13,000 sqm of light and general industrial floorspace (E(g)(iii) and B2), 15,500 sqm of warehousing floorspace (B8) 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. 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. 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. These conclusions were revisited in 2025 and concluded to be robust. 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	New paragraphs to clarify employment needs necessary to ensure the plan is effective and consistent with national policy Modification to clarify the most recent review of the retail needs evidence is up to date and robust. Necessary for clarity and effectiveness Amendment necessary to address drafting error, hierarchy is listed	

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			these locations and further detail on their role in the spatial strategy is shown in ~~Figure 3.1~~ the hierarchy of development detailed below: ~~3.22. The hierarchy of development is detailed overleaf:~~ 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. 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). 3.33. When considering all sources of supply, the Local Plan housing requirement has been set as a minimum of ~~4,700~~ 6,012 dwellings over the plan period (2022-2040). 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 40~~214~~ dwellings, which provides a degree of flexibility over the Local Plan period should	- no figure 3.1. Removal of duplicated wording. Necessary for effectiveness. Deleted text, necessary for effectiveness, to avoid unnecessary duplication 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	

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<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy no./ Para no.</th><th>Main Modification</th><th>Reason for modification</th><th>Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?</th></tr>
<tr><td></td><td></td><td></td><td>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).

Table S1a: Sources of supply over the Local Plan period: 2022-2040 (net number of new homes)
<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 202<u>426</u>)</td><td><u>605</u> ~~456~~</td></tr>
<tr><td>Commitments (permissions as of April 202<u>426</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> ~~103~~</td></tr>
<tr><td>Allocations beyond current urban area to be ~~inset~~ <u>removed</u> from the Green Belt</td><td>2,497 ~~1,580~~</td></tr>
<tr><td>Total supply over the plan period</td><td>~~4,914~~ <u>6,052</u></td></tr>
</table></td><td>and consistent with national policy

It is necessary for the policy to modify housing requirements in order to be positively prepared and consistent with national policy</td><td></td></tr>
</table>

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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 S1 – Spatial Strategy During the plan period (2022-2040): provision has been made for at least ~~4,700~~ 6,012 new homes The minimum requirement is split into an annual average requirement on a stepped basis as follows: Years 1 – 4 (2022/23 – 2025/26) – 152 homes per annum Years 5 – 18 (2026/27 – 2039/40) – 386 homes per annum Table S1a shows the contribution of all sources of housing supply to deliver this housing requirement. ~~Employment needs~~ At least 41,464 sqm of employment floorspace (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 floorspace that is compatible with residential use in Epsom Town Centre.	Modified to reflect increased housing supply and trajectory 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 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.	

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			~~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. 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. The Council will expect the development proposals and use of land to contribute positively to the social, economic and environmental enhancement of the Borough.		

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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 insetting 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.

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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	**Policy S2 – ~~Sustainable and~~ Viable Development** ~~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.~~ 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. 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. ~~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	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 Necessary for effectiveness and in order to reflect changes to other policies in the Plan Additional text necessary for effectiveness and to reflect changes to other policies in the Plan removing unnecessary duplication	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?
			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. ~~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.~~ 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.~~ **<u>Viability late stage reviews</u>** <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>	Modified text necessary for effectiveness and to ensure policy is positively prepared … Necessary for the effectiveness for the policy to specify circumstances where the Council may require late stage viability review	

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?
			~~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. ~~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). ~~3.41~~ 3.42. For schemes where the ~~outturn test~~ late stage review demonstrates that viability has improved and 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. **Policy S2 – ~~Sustainable and~~ Viable Development** **~~Sustainable Development~~** ~~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.~~	Necessary for effectiveness for 'sustainable development' parts of the policy moved to policy S1 and to remove unnecessary duplication	

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			~~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.~~ ~~Where there are no policies relevant to the application or they are out of date at the time of making the decision then the council will grant permission unless material considerations indicate otherwise – taking into account whether:~~ ~~a) any adverse impacts of granting 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~~ ~~b) specific policies in the National Planning Policy Framework indicate that development should be restricted.~~ ~~**Viable Development**~~ ~~4~~1) ~~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. ~~5~~2) ~~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		

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?
			unforeseen significant additional costs. The council will commission an independent review of submitted viability assessments which will be funded by the applicant. ~~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.~~ ~~7~~3) 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.		

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?
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	**Policy S4: Epsom Town Centre** Epsom Town Centre is defined on the policies map. Development will be permitted here which: ~~The Council will work with partners and private developers to:~~ Promotes ~~Encourage~~ the regeneration of the town centre to deliver high quality and high density development that makes efficient use of land through the redevelopment of the site allocations detailed in this plan and other windfall sites that may come forward in the future; ~~Encouraging~~ Secures 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; Maintains and enhances the visitor experience and night-time economy; Retains and enhances existing markets and support opportunities for the creation of new markets; Delivers high quality public realm integrating tree planting, landscaping and good quality design to assist in delivering the aspirations of the Epsom Town Centre Masterplan; Supports the delivery of the Surrey Local Transport Plan 4 and any successors, and proposals in the Epsom and Ewell Local Cycling and	Modifications to include adding reference to the efficient use of land, securing mixed uses and criteria g. Necessary for the effectiveness of the policy	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.

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?
			Walking Infrastructure Plan to support the transition towards zero carbon transport; Ensures the distinctive character of Conservation Areas within the town centre boundary are conserved ~~and, where possible,~~ or enhanced. 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.~~	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	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.	Modified to more appropriate wording on Green Belt allocations and the additional references to additional site allocations Necessary for effectiveness and ensuring the Plan is positively prepared	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	Policy SA1 – Southern Gas Network Site Allocated for: ~~Approximately~~ A minimum of ~~455~~ 456 dwellings ~~(C3)~~ and a bespoke performing arts centre for the Laine Theatre Arts. Site Area: ~~1.54~~ 61.69 ha Planning history: Application reference 24/01107/FUL (permitted) 	Modified to reflect number of units as a minimum of 456 dwellings necessary to ensure consistent with national policy and optimising density Removed 'C3' , Modified site area and added 'permitted' with the addition of application 'reference' wording all for effectiveness Part a) modified for effectiveness and to recognise potential conflict between users in this location	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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			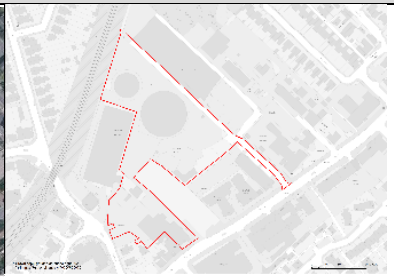 In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>that is designed to minimise potential conflict between car users, pedestrians and cyclists.</u> Provide a linear <u>public</u> open space to provide permeability through the site for pedestrians and cyclists into and from the development to provide connectivity between Hook Road and the Rainbow Leisure Centre. 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~~, as well as meeting the requirements for sustainable drainage in Policy S16~~. Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied. 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.	Part b) amended to reflect planning permission Remaining parts of the policy amended 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?
			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, through design incorporating positive elements of local character and appearance. Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential. Be designed ~~Design~~ to enable the comprehensive redevelopment of the adjoining Hook Road Car Park site (Site Allocation SA2) as a future phase. Include mixed use ground floor active frontages providing Commercial, Business and Service floorspace to provide natural surveillance of the public realm.		
MM10	35	Policy SA2	**Policy SA2 – Hook Road Car Park** **Allocated for:** ~~Approximately~~ A minimum of 145 ~~150~~ dwellings. **Site Area:** 0.4~~8~~6ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle, pedestrian and cycle access to the site that is designed to minimise potential conflict between car users, pedestrians and cyclists. 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~~, as well as meeting the requirements for sustainable drainage in Policy S16~~.	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 Part j) Include wording to reflect future car park	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.

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?
			Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied. 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. Conserve ~~and, where possible,~~ or enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings. Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential. Be designed as a future phase of the adjoining Southern Gas Networks Site (Site Allocation SA1). Include mixed use ground floor active frontages providing Commercial, Business and Service floorspace to provide natural surveillance of the public realm. Consider the findings of the Councils car parking study and its recommendations in relation to public car parking provision at the site.	study to ensure policy is positively prepared	
MM11	36	Policy SA3	Policy SA3 – Solis House, 20 Hook Road Allocated for: ~~Approximately~~ A minimum of 20 dwellings ~~(C3).~~ Site Area: 0.07ha Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle, pedestrian and cycle access from Hook Road.	Modified to reflect number of units as a minimum necessary to ensure consistent with national policy and optimising density Removed 'C3' as use classes, part a, f and g all modified 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 is

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			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. 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. Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied. Conserve ~~and, where possible,~~ or enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings through sensitive design incorporating positive elements of local character and appearance. Undertake archaeological investigations in accordance with Policy DM13 ~~15~~, taking account of the site's location within an Area of High Archaeological Potential. Consider the site's prominent location for a high-quality designed landmark building.	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	**Policy SA4 – Bunzl, Hook Road** **Allocated for:** ~~Approximately~~ A minimum of 35 ~~20~~ dwellings. **Site Area:** 0.17ha **Planning history:** Application reference 24/00230/FUL & 23/01440/PDCOU (both permitted)	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	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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			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. Conserve ~~and, where possible,~~ <u>or</u> enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings at 10 and 12 Hook Road. 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~~, as well as meeting the requirements for sustainable drainage in Policy S16.~~ Investigate and if identified remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.	permitted for effectiveness Part a) modified to address site specific access for effectiveness Add 'conserve or enhance' to all references in site allocations Part d) For clarification purposes	of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM13	38	Policy SA5	Policy SA5 – Epsom Town Hall Allocated for: ~~Approximately~~ <u>A minimum of</u> 90 dwellings ~~(C3).~~ Site Area: 0.74ha Planning history: None	Modified to reflect 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?
			In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Dullshot Green. Maximise retention and safeguarding of existing trees and incorporate them into a well-integrated landscape strategy. 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 Ground 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 the Epsom Town Centre Conservation Area and the Grade II listed 'Old Pines' that are located in close proximity to the site through sensitive design incorporating positive elements of local character and appearance. Retain some public car parking which includes blue badge spaces. Maximise linkages with the town centre by integrating cross site movement routes for pedestrians and cyclists.	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	**Policy SA6 – Hope Lodge Car Park** **Allocated for:** ~~Approximately~~ A minimum of 35 ~~30~~ dwellings ~~(C3).~~ **Site Area:** 0.4ha **Planning history:** None	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

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: a) Provide safe and 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 which frames and provides intervisibility of Dullshot Green as a public space. 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 ~~15~~, 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 through sensitive design incorporating positive elements of local character and appearance. g) Consider the findings of the Councils car parking study and its recommendations in relation to public car parking provision at the site.	policy and optimising density Removed 'C3' as use classes, amended parts a,b,e and f for effectiveness Amend part g Include wording to reflect future car park study to ensure policy is positively prepared Changes necessary to ensure policy is justified and effective	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.
MM15	40	Policy SA7	**Policy SA7 – Former Police and Ambulance Station Sites** **Allocated for:** Erection of a new 85 bedroom residential, nursing and dementia care home for the frail elderly ~~(Use Class C2)~~. **Site Area:** 0.37ha	Modified to removed use class reference, add the addition of 'application reference' wording and deletion of	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?
			Planning history: Application reference 22/00923/FUL (approved~~, subject to S106 agreement~~) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and 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 through sensitive design incorporating positive elements of local character and appearance. e) Minimise loss of existing trees, including appropriate root protection for those immediately adjacent to the site.	'subject to S106 agreement' all necessary to ensure the policy is positively prepared Parts a and d modified to ensure the policy is effective	
MM16	41	Policy SA8	**Policy SA8 – Epsom Clinic** **Allocated for:** ~~Approximately~~ A minimum of 30 dwellings. **Site Area:** 0.17ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Dullshot Green.	Modified to reflect number of units as a minimum of 30 necessary to ensure consistent with national policy and optimising density Part a) site specific vehicular access and	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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			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 DM13~~15~~, 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.	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	**Policy SA9 – Depot Road and Upper High Street Car Park** **Allocated for:** ~~Approximately~~ <u>A minimum of</u> 100 dwellings ~~(C3)~~ and a decked public car park. **Site Area:** 1.24ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Upper High Street and Church Street.	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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			b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. c) Conserve or enhance ~~Have regard to~~ the setting of the adjoining Pikes Hill Conservation Area located to the east of the site through sensitive design. 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 DM13~~15~~, 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. g) Consider the findings of the Councils car parking study and its recommendations in relation to public car parking provision at the site.		Report and no further LSEs that may compromise European site integrity are foreseen.
MM18	43	Policy SA10	**Policy SA10 – 79-85 East Street** **Allocated for:** ~~Approximately~~ A minimum of 34 dwellings ~~(C3).~~ **Site Area:** 0.22ha **Planning history:** Application reference 22/01953/FUL and 22/01954/FUL (both permitted) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from East Street and/or Linton's Lane.	Modified so the number of units reflected as a minimum of 34 units necessary to ensure consistent with national policy and optimising density Removed 'C3' as use class and changed to criteria a and d to ensure the policy is	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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			~~a~~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. ~~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. ~~c~~d) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. ~~d~~e) 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.	positively prepared and effective	Report and no further LSEs that may compromise European site integrity are foreseen.
MM19	44	Policy SA11	**Policy SA11 – Finachem House, 2 – 4 Ashley Road** **Allocated for:** ~~Approximately~~ A minimum of 38 ~~20~~ dwellings ~~(C3)~~ or 90 units of student accommodation **Site Area:** 0.12ha **Planning history:** Pre-application In addition to complying with the policies in the plan, any developer of this site will be required to:	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

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			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. d) 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 Epsom Town Centre Conservation Area and the Grade II* listed 'Ashley House' that adjoin the site boundary to the North through sensitive design incorporating positive elements of local character and appearance. Undertake archaeological investigations in accordance with Policy DM13~~15~~, taking account of the site's location within an Area of High Archaeological Potential. g) Consider the site's prominent location for a high-quality design landmark building.	requirements for effectiveness	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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MM20	45	Policy SA12	**Policy SA12 – Global House** **Allocated for:** ~~Approximately~~ A minimum of 75 dwellings ~~(C3)~~ **Site Area:** 0.29ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide appropriate pedestrian and cycle access to the site from Ashley Avenue. 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 through sensitive design incorporating positive elements of local character and appearance. Undertake archaeological investigations in accordance with Policy DM1~~5~~3, taking account of the site's location within an Area of High Archaeological Potential.	Modified to reflect the number of units as a minimum of 75 necessary to ensure consistent with national policy and optimising density. 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 All changes necessary changes 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 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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MM21	46	Policy SA13	**Policy SA13 – Swail House** **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. **Site Area:** 1.05ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle~~, pedestrian and cycle~~ access to the site from Heathcote Road and pedestrian and cycle access from Heathcote Road and Ashley Road. 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 the site through sensitive design incorporating positive elements of local character and appearance. Retention of the Grade II listed wall that forms part of the site boundary.	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 DM13~~15~~, taking account of the site's location within an Area of High Archaeological Potential.		
MM22	47	Policy SA14	**Policy SA14 – 60 East Street** **Allocated for:** ~~Approximately~~ A minimum of 30 dwellings ~~(C3)~~ **Site Area:** 0.24ha **Planning history:** Application reference 24/00900/PDCOU (permitted prior approval) In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle, pedestrian and cycle access to the site from East 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.	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	**Policy SA15 – Corner of Kiln Lane and East Street (101b East Street)** **Allocated for:** ~~Approximately~~ A minimum of 5 dwellings **Site Area:** 0.03ha **Planning history:** Application reference 15/01663/FUL (unimplemented) In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Kiln Lane. Design surface and foul water drainage to include all required measures arising from the site being located in Source Protection Zone 1. Consider the site's prominent location for a high-quality designed landmark building.	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	**Policy SA16 – Land at Kiln Lane** **Allocated for:** ~~Approximately~~ A minimum of 40 dwellings **Site Area:** 0.67ha **Planning history:** None	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?
			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 <u>from Kiln Lane.</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. <u>Design the scheme to ensure the amenity impacts on future occupiers from adjacent non-residential uses is adequately addressed.</u>	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	**Policy SA17 – Hatch Furlong Nursery** **Allocated for:** ~~Approximately~~ <u>A minimum of</u> 30 dwellings ~~(C3)~~ **Site Area:** 0.5ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: 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	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

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			Highways Authority with regard to accessibility and safety. Provide pedestrian and cycle access to the site from Cheam Road. Maximise retention and safeguarding of existing trees and hedgerows, and incorporate them into a well-integrated landscape strategy. 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~~. ~~e)~~ d) Undertake archaeological investigations in accordance with policy DM13~~15~~, taking account of the site's location within an Area of High Archaeological Potential. ~~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.	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	**Policy SA18 – Land to the Rear of Rowe Hall** **Allocated for:** Extra Care Accommodation ~~(Class C2)~~ comprising 96 self contained apartments, staff and communal facilities. **Site Area:** 1.2~~3~~7ha **Planning history:** Outline Planning Application Granted June 2024 Reference: EP23/00633/CMA In addition to complying with the policies in the plan, any developer of this site will be required to:	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.

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			Provide safe and appropriate vehicle, pedestrian and cycle access to the site from ~~the~~ Salisbury Road. Provide a revised Scouts Hut curtilage to include a new parking amenity area incorporating the shared access way. 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.~~ Maximise the retention and safeguarding of existing mature trees within the site and incorporate those features in a coherent landscaping strategy for the site. Facilitate access to public transport including bus or other public transport services including facilities that encourage public transport use. 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.	changs necessary for effectiveness of the policy	
MM27	52	Policy SA19	**Policy SA19 – 7 Station Approach** **Allocated for:** ~~Approximately~~ A minimum of ~~5~~ 8 dwellings ~~(C3)~~ **Site Area:** 0.04ha **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)	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

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			In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and 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 3.	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	**Policy SA20 – Esso Express, 26 Reigate Road** **Allocated for:** ~~Approximately~~ A minimum of 10 dwellings ~~(C3)~~ **Site Area:** 0.25ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate: i) vehicle, pedestrian and cycle access from the Ewell By-Pass. ii) pedestrian and cycle access from Reigate Road. 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. Ensure the site layout maximises retention and safeguarding of mature existing trees, incorporating these in a coherent landscaping strategy for the site.	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

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			Undertake archaeological investigations in accordance with Policy DM13~~15~~, taking account of the site's location within an Area of High Archaeological Potential.		site integrity are foreseen.
MM29	54	Policy SA21	**Policy SA21 – Richards Field Car Park** **Allocated for:** ~~Approximately~~ A minimum of 7 dwellings and the retention of a minimum of 7 public car parking spaces. **Site Area:** 0.07ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Chessington Road. 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 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	**Policy SA22 – Etwelle House, Station Road** **Allocated for:** ~~Approximately~~ A minimum of 20 dwellings ~~(C3)~~ **Site Area:** 0.2ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Station Approach whilst ensuring the safety of users of the adjoining railway station. Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied. 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	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	~~**Policy SA23 – 140-142 Ruxley Lane**~~ ~~**Allocated for:** Approximately 12 dwellings (C3)~~ ~~**Site Area:** 0.2ha~~ ~~**Planning history:** 23/00588/FUL – Redevelopment into 14 dwellings (Granted)~~	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	**Policy SA24 – Garages at Somerset Close & Westmorland Close** **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: Provide safe and appropriate vehicle, pedestrian and cycle access from Somerset Close and Westmorland Close. 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 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	**Policy SA25 – 64 South Street Epsom** **Allocated for:** ~~Approximately~~ A minimum of 10 dwellings **Site Area:** 0.14ha **Planning history:** Application reference 20/00041/FUL - COU from B1 to 6 dwellings (lapsed) In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate: i) vehicle, pedestrian and cycle access from Saint Margaret Drive; ii) pedestrian and cycle access from South Street (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. Undertake archaeological investigations in accordance with Policy DM13~~15~~, taking account of the site's location within an Area of High Archaeological Potential.	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	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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			Conserve ~~and, where possible,~~ or enhance the setting of the Woodcote Conservation Area and the adjacent Grade II listed Abel Cottages through sensitive design incorporating positive elements of local character and appearance.		
MM34	59	Policy SA26	**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) In addition to complying with the policies in the plan, any developer of this site will be required to: Provide appropriate and safe vehicle, pedestrian and cycle access to the site from Alexandra Road. 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. 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.~~	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 refence 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	**Policy SA27 – 22-24 Dorking Road** **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) In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Dorking Road and / 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 through sensitive design incorporating positive elements of local character and appearance.	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	**Policy SA28 – 63 Dorking Road** **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	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

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			Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Hylands Mews. Retain and convert ~~Conserve and enhance~~ the part of the building that is Grade II Listed. Conserve or ~~and~~ enhance the setting of the Grade II Listed buildings adjoining the site through sensitive design incorporating positive elements of local character and appearance.	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	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.
MM37	62	Policy SA29	~~**Policy SA29 – 65 London Road**~~ ~~**Allocated for:** Care home up to 81 bedrooms (use class C2) **Site Area:** 0.30ha~~ ~~**Planning history:** 23/00817/FUL (approved, but not implemented), 22/00728/FUL (approved, but not implemented) and 20/01079/FUL (approved, but not implemented)~~ ~~In addition to complying with the policies in the plan, any developer of this site will be required to:~~	Policy deleted as permission being implemented	No. Policy deletion introduces no 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?
			~~a) Provide appropriate vehicle, pedestrian and cycle access to the site from London Road.~~ ~~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.~~ ~~c) Conserve and, where possible, enhance the setting of the Grade II listed buildings in close proximity to the site.~~		
MM38	63	Policy SA30	**Policy SA30 – Epsom General Hospital** **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)~~ **Site Area:** 1.45ha **Planning history:** Application reference: 21/00252/FUL (granted at appeal, development commenced), 20/00108/FUL (approved) and 19/01722/FUL (refused) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Woodcote Green Road. b) Provide offsite highway improvements: i) along Woodcote Green Road to improve safety and public transport infrastructure	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

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			ii) along Dorking Road to improve public transport infrastructure ~~b~~c) Satisfy the requirements for sustainable drainage in Policy S16.		Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM39	64	Policy SA31	**Policy SA31 – Land at West Park Hospital (South)** **Allocated for:** ~~Approximately~~ A minimum of 50 dwellings ~~(C3)~~ **Site Area:** 1.81ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Richmond Crescent. b) 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. ~~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.	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.

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			~~d)~~e) Conserve ~~and, where possible,~~ or enhance the setting of the West Park Conservation Area through sensitive design incorporating positive elements of local character and appearance. ~~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. ~~f)~~g) Undertake archaeological investigations in accordance with Policy DM13~~15~~, taking account of the site's location within an Area of High Archaeological Potential.		
MM40	65	Policy SA32	**Policy SA32- Land at West Park Hospital (North)** **Allocated for:** ~~Approximately~~ A minimum of 18~~5~~0 dwellings ~~(C3)~~ **Site Area:** 5.22 ha **Planning History:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from the existing hospital access road. ~~and enable the site to be served by public transport~~ b) 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	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?
			~~b~~c) Provide permeability through the site for pedestrians and cyclists into and from development to provide connectivity between adjoining residential areas and Horton County Park. ~~c~~d) 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. ~~d~~e) 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~~f) Conserve ~~and, where possible,~~ or ~~–~~enhance the setting of the West Park Conservation Area and Grade II listed water tower that lies to the south of the site through sensitive design incorporating positive elements of local character and appearance. ~~f~~g) Ensure that site layout that retains and safeguards existing mature trees as part of a coherent landscaping strategy for the site. ~~g~~h) Undertake archaeological investigations in accordance with policy DM13~~15~~, taking account of the site's location within an Area of High Archaeological Potential	policy. All necessary for the policy to be positively prepared and effective	compromise European site integrity are foreseen.

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MM41	66	Policy SA33	**Policy SA33- Land at Chantilly Way** **Allocated for:** ~~Approximately~~ A minimum of 30 dwellings ~~(C3)~~ **Site Area:** 0.7 ha **Planning History:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Chantilly Way. 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. ~~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. ~~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.~~ d) Minimise the loss of existing trees, including appropriate root protection for those immediately adjacent to the site. e) 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	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	**Policy SA34- Hook Road Arena** **Allocated for:** New Sports Hub for community use in the borough to include playing pitches (grass and artificial), a new pavilion and changing facilities. The provision of a minimum of ~~approximately~~ 100 dwellings ~~(C3)~~ on the eastern part of the site. **Site Area:** 14 ha **Planning History:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from the existing access on Hook Road. b) Facilitate access to public transport including bus services operating within the vicinity of the site to ensure connectivity to the wider area. ~~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. ~~c)~~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. ~~d)~~e) Achieves a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric. f) enter a community use agreement in relation to the use of the sports hub.	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	**Policy SA35 – Land at Horton Farm** **Allocated for:** ~~Approximately~~ A minimum of 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. **Site Area:** 37.9 ha **Planning History:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Chantilly Way and Horton Lane ~~and enable the site to be served by public transport~~ b) 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. ~~b~~d) Provide permeability through the site for pedestrians and cyclists ~~into and from the development~~ to provide connectivity within the site and to ~~between~~ adjoining ~~residential~~ areas and associated facilities including Horton Local Centre and Horton County Park. ~~c~~e) Provide a community building, capable of accommodating early years education provision and other community uses responding to the needs of the locality. ~~d~~f) 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	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 Changes necessary to ensure the policy is justified, effective and positively prepared	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.

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			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. ~~e~~g) 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. ~~f~~h) 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. ~~g~~i) 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). ~~h~~j) 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. ~~i~~k) 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. ~~j~~l) Conserve ~~and, where possible,~~ or enhance the setting of Grade II Listed Horton Farm House through sensitive design incorporating positive elements of local character and appearance. ~~k~~m) 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.		

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			ln) Achieves a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.		
MM44	n/a	New site allocation SA36	**Policy SA36 – 25 Alexandra Road, Epsom** **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) In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Alexandra Road. Maximise the retention and safeguarding of TPO mature trees within the site and incorporate those features in a coherent landscaping strategy for the site. Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.	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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			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.		
MM45	n/a	New site allocation SA37	**Policy SA37 – Gainsborough Road estate, Epsom** **Allocated for:** A minimum of 8 dwellings **Site Area:** 0.26 ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate: i) vehicle, pedestrian and cycle access to the East parcel from Harvester Road ii) vehicle, pedestrian and cycle access to the West parcel from Gainsborough Road.	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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			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.		
MM46	n/a	New site allocation SA38	**Policy SA38 – Parking at 54 Gainsborough Road** **Allocated for:** A minimum of 6 dwellings **Site Area:** 0.10 ha **Planning history:** Pre-application In addition to complying with the policies in the plan, any developer of this site will be required to: 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	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	**Policy SA39 – 85b Hook Road, Epsom** **Allocated for:** A minimum of 8 dwellings **Site Area:** 0.14 ha	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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			Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Hook Road. 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.		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	**Policy SA40 – Land west of Ewell By-Pass** **Allocated for:** A minimum of 38 dwellings **Site Area:** 0.87 ha	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

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 history: None In addition to complying with the policies in the plan, any developer of this site will be required to: 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. Maintain and enhance the footpath along the western edge of the site Ensure the site layout maximises retention and safeguarding of mature trees, incorporating these 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. Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential. Conserve or enhance the significance and setting of the Ewell Village Conservation Area through sensitive design incorporating positive elements of local character and appearance.		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	**Policy SA41 – Conservative Club, Epsom Club and Church**	Additional allocation to ensure the plan is	

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			Allocated for: Mixed use development for community uses (approximately 1,800sqm) and a minimum of 28 dwellings **Site Area:** 0.35 ha **Planning history:** No residential planning history In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Church Street. 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. 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, taking account of the site's location within an Area of High Archaeological Potential. 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.	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?
			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.		
MM50	n/a	New site allocation SA42	**Policy SA42 – TK Maxx** **Allocated for:** Mixed use development to provide retail and leisure uses (approx. 3,750 sqm) and a minimum of 17 dwellings **Site Area:** 0.14 ha **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide safe and appropriate: i) pedestrian and cycle access to the site from Epsom High Street; ii) vehicle, pedestrian and cycle access from Station Approach. Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.	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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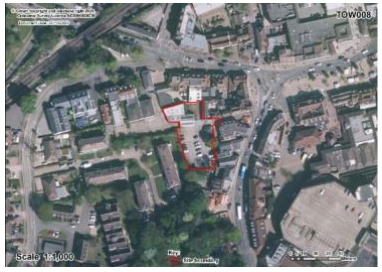
Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Retain active ground floor retail frontages along the parts of the site that front the High Street and form part of the Primary Shopping Area for the Town Centre. Consider the site's prominent Town Centre location for a high-quality designed building. 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. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.		
MM51	n/a	New site allocation SA43	**Policy SA43 – Land R/O The Albion Public House (Mccaffertys Bar)** **Allocated for:** Mixed use development, a minimum of 11 dwellings and approximately 500sqm commercial, business or service floorspace **Site Area:** 0.14 ha **Planning history:** None  In addition to complying with the policies in the plan, any developer of this site will be required to:	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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			Provide safe and appropriate vehicle, pedestrian and cycle access to the site from South Street. Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential. 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. Retention of the Grade II listed wall that forms part of the site boundary. Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.		
MM52	n/a	New site allocation SA44	**Policy SA44 – Spread Eagle Shopping Centre** **Allocated for:** Mixed use development to provide retail and leisure uses (approximately 2,000sqm) and student accommodation (a minimum of 40 units) **Site Area:** 0.18 ha **Planning history:** Pre-application In addition to complying with the policies in the plan, any developer of this site will be required to:	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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			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. 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. Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential. Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. 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. 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. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.		site integrity are foreseen.
MM53	n/a	New site allocation SA45	**Policy SA45 – Auction House, Depot Road** **Allocated for:** Mixed use development to provide commercial, business and service floorspace (approximately 500sqm) and a minimum of 10 dwellings **Site Area:** 0.12 ha **Planning history:** None	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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			 In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Depot Road. 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. 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.		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	**Policy SA46 – Laine Theatre Arts** **Allocated for:** A minimum of 6 dwellings **Site Area:** 0.05 ha **Planning history:** None	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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			In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle, pedestrian and cycle access to the site from East Street. 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. Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential. Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.		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	**Policy SA47 – Eclipse Business Park, West Hill** **Allocated for:** Mixed use development to provide commercial, business and service floorspace (approximately 1,500sqm) and a minimum of 23 dwellings **Site Area:** 0.39 ha	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

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 history: Historic application for 30 flats In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle, pedestrian and cycle access to the site from West Hill. Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential. 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.		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	**Policy SA48 – Cuddington Glade** **Allocated for:** Residential Care Home providing at least 70 bedrooms **Site Area:** 0.52 ha	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

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 history: Application reference 26/00002/FUL (awaiting determination) In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Cherry Tree Lane bordering the western boundary of the site. 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. Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.		sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.
MM57	n/a	New site allocation SA49	**Policy SA49 – Land off Cuddington Glade** **Allocated for:** Minimum of 45 dwellings **Site Area:** 1.11 ha	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

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 history: None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate: 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; pedestrian and cycle access to the site from the established footpath bordering the site to the North. 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. Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.		sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.
MM58	n/a	New site allocation SA50	**Policy SA50 – Land at Priest Hill**	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

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?
			Allocated for: 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 **Site Area:** 4.71ha **Planning history:** Pre application (up to 530 dwellings, commercial floorspace, public open space) In addition to complying with the policies in the plan, any developer of this site will be required to: Provide safe and appropriate: vehicle, pedestrian and cycle access to the site from Cheam Road and Banstead Road; pedestrian and cycle access to Ewell East Station and pedestrian access to the other established public rights of way adjoining the site. 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.		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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			Maintain vehicular access for neighbouring users including NESCOT, the neighbouring sports pitches operated by SEFRC and residential properties fronting Cheam Road. 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. Provide off-site improvements to the public rights of way that run adjacent to the railway line connecting Cheam Road and Reigate Road. Provide financial contributions towards accessibility improvements at Ewell East Station. 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. 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. The occupation of the development should be phased to align with the delivery of any necessary upgrades to water supply and waste water infrastructure. 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. Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.		

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?
MM59	n/a	New site allocation SA51	**Policy SA51 – Downs Farm** **Allocated for:** Land to the North of College Road: A minimum of 530 dwellings, employment hub, specialist school provision (up to 2.5ha) and public open space Land to the South of College Road: Public open space with improved pedestrian and cycle connectivity to Epsom Downs Station and playing pitches and supporting facilities. **Site Area:** 27.66 ha (north), 17.92 ha (south) **Planning history:** None In addition to complying with the policies in the plan, any developer of this site will be required to: Land to the North of College Road Provide safe and appropriate: vehicle, pedestrian and cycle access to the site from Reigate Road;	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?
			pedestrian and cycle access to the site from Longdown Lane and College Road. 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. 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. 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. 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. 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. Provision of a new specialist school of up to 2.5ha on the site. The occupation of the development should be phased to align with the delivery of any necessary upgrades to water supply and waste water infrastructure. Provide suitable noise and vibration attenuation measures to ensure that future occupiers have an acceptable level of residential amenity given the existing adjoining business.		

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			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. 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. Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric. Land to the South of College Road 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. Vehicular access should be secured from improvements to the existing access along College Road.		
MM60	70	Para. 5.3.	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). *Move table S5a into main body of text as below:*	Added source/reference to HEDNA table, necessary for effectiveness Table S5a concerning housing mix moved to	No. The change does not introduce any new LSEs that may compromise European site integrity.

<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy no./ Para no.</th><th>Main Modification</th><th>Reason for modification</th><th>Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?</th></tr>
<tr><td></td><td></td><td></td><td></td><td>the policy wording for effectiveness</td><td></td></tr>
<tr><td>MM61</td><td>70</td><td>Policy S5</td><td>Policy S5: Housing mix and type

Residential development will be permitted where <s>the following criteria are met: a)</s> t<s>T</s>he mix of tenure, type and size <s>reflects</s> 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. <s>or any subsequent update; and b) The housing mix has regard to the size, characteristics and location of the site.</s>

Table S5a:Housing Mix
<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>
Key supporting documents</td><td>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

It is necessary for effectiveness to clarify criteria a and b. These have been combined and reworded

New key supporting documents section</td><td>No. The change does not introduce any new LSEs that may compromise European site integrity.</td></tr>
</table>

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?
			Housing and Economic Development Needs Assessment (2023)	added after Policy S5 necessary for effectiveness	
MM62	71-72	Policy S6	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. 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. *New paragraphs inserted after para 5.7.* 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. 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. 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.	It is necessary for effectiveness that reference has been added to staff accommodation and essential local workers housing Additional supporting text necessary for effectiveness to set out how affordable housing on site should be distributed Modification necessary to correct policy title to	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?
			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. ~~**Vacant building credit**~~ 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.~~ **Policy S6: Affordable Housing** 1) The council will require proposals to provide affordable homes on all residential developments comprising self-contained units, as follows: ~~On greenfield sites~~ 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:	ensure policy is positively prepared Delete as repeats national policy 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	

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			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 450% affordable housing of the gross number of dwellings; On greenfield sites located within the defined urban area as identified on the policies map: ~~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; On all other sites ~~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; 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) 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;	identified by the Framework Reworded point 4 to reflect supporting text and ensure policy is justified	

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			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.~~ 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; 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). 6) 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. ~~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. ~~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.~~	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) Local Plan Viability Update Note (2024)	For effectiveness added viability evidence under 'key supporting documents'	
MM63	74-75	Policy DM1	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~~ Emissions and Energy Standards. **Policy DM1: Residential Space Standards** 1) Proposals for new residential dwellings ~~(Use Class C3)~~ will be permitted where: a) the internal space complies with or exceeds the nationally described space standards or any future equivalent. b) the minimum requirements for private outdoor space as set out below are satisfied: i) a 5 sq m balcony within flatted development accessible from the main habitable room ii) a dedicated private garden for houses.	Necessary for effectiveness in terms of the name change to policy DM10 Necessary for effectiveness to remove the use classes to future proof the policy	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?
			Parts 2 and 3 (i) and (ii) of the policy remain the same **Key supporting documents** ~~Technical housing standards- nationally described space standards~~ Statutory guidance - Technical housing standards- nationally described space standards ~~Approved Document M – Access to and use of buildings Volume 1: dwellings~~ Statutory guidance – Access to the use of Buildings- Approved Document M	References to the documents are set out in full for effectiveness	
MM64	78-79	Policy S7	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~~. 5.33. Evidence on how this translates to need for the required number of specialist homes or care home 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. 5.34. SCC predicts an oversupply of market extra care units and a minimum need for 75~~146~~ affordable extra care units up to 2035. 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~~	Necessary for effectiveness, and to ensure that the policy uses appropriate definition for specialist housing Necessary for effectiveness to include appropriate definitions & specialist care provision	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			~~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.~~ **Policy S7: Specialist Housing** 1) Development proposals for specialist accommodation, such as homes for older people, people with disabilities and students ~~or the neurodiverse~~ will be permitted where: 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; and	Necessary for effectiveness text modified with regard to specialist housing definition Deletion of criteria g and h as not necessary to make policy effective and justified Modified part 2 to be more effective and removed use class to ensure policy is consistent with national policy	

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			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. ~~g) it can be demonstrated that revenue funding can be secured to maintain the long-term viability of the scheme; and~~ h) ~~the scheme is supported by the relevant statutory agencies~~. 2) Larger-scale new residential developments (over 200 ~~C3~~ dwellings) will be required to incorporate some specialist accommodation, in line with ~~the above~~ criteria 1, unless there is ~~reasonable~~ evidence that it is not feasible. **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.		
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 there are exceptional circumstances that might justify their loss. 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.	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	Transit accommodation provision 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. Assessing applications for Gypsy and Traveller provision ~~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.~~ 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. 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.	Amended text for clarity and effectiveness Necessary for clarity and effectiveness to reword and remove 'transit'	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.

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 S8: Gypsies, Travellers and Travelling Showpeople **Safeguarding existing supply** 1) Land authorised for permanent gypsy, traveller and travelling showpeople accommodation will be safeguarded from alternative development. Proposals which involve a change of use of the land or a loss of pitches or plots will not be permitted unless it can be evidenced that they are no longer required or new suitable equivalent provision is made. **Planning applications** 2) Development proposals for gypsy and traveller and travelling showpeople accommodation and ancillary buildings, will be permitted where: a) The use of the land is of a scale appropriate to the location; b) the site is capable of being provided with necessary on-site services; c) the site is conveniently located for access to schools, medical services and other community facilities; d) the site has a safe vehicular and pedestrian access from the public highway and adequate provision for parking; turning and safe manoeuvring of vehicles within the site;	Modified Criteria f) to be worded positively around appropriate lan dscaping. 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	

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			e) the site provides adequate space for storage, play and residential amenity; f) the site is appropriately ~~not enclosed with hard~~ landscaped~~ing, high walls or fences, to an extent that suggests deliberate isolation from the community~~; g) the use of the land will not result in an unacceptable adverse impact upon local amenity, the existing character of the area and the natural and historic environment; and i) ancillary buildings are of an appropriate scale and size. 3) Proposals for mixed residential and business activities will be assessed on a site-specific basis, taking the above criteria into account. 4) Proposals for transit gypsy and traveller accommodation will be permitted where the proposal: a) complies with the above Part 2 criteria (except for c, e, f and h); b) can demonstrate it is located on an established travelling route.		

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			c) provides basic utilities including those for the supply of water and disposal of waste water. ~~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).~~ ~~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.~~ ~~**Meeting future needs within larger unallocated development sites**~~ ~~6~~5) ~~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.~~ ~~7~~6) ~~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.~~	The Plan will meet the identified need through the site allocations proposed. As a result, this text is not necessary	

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MM67	86	Policy S9	~~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. *6 new paragraphs inserted after para. 6.1.* 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. 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. 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	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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			employment uses established at the site that fall within the Sui Generis use class, including vehicle sales and repairs, builders' merchants and trade counters. 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. 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. 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. 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	Necessary for clarity and effectiveness to define the two industrial areas in the policy	

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			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. **Policy S9: Economic Development** The sustainable growth of the borough's economy will be promoted to meet the needs of different sectors by: 1)~~Supporting the regeneration of Epsom Town Centre by enabling new and established businesses to grow.~~ 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~~.~~ 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 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;~~ 3) Safeguarding land and supporting appropriate 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.	Necessary for clarity and effectiveness to modify text to set out the strategy for the protection and intensification of the industrial sites 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 Part 5 and 6 of the policy have been	

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			4) Supporting the visitor and night-time economy; 5) Supporting the creative and cultural industries and further and higher education providers by protecting existing and enabling the provision of new or extended venues and facilities where appropriate.~~;~~ ~~6) Protecting existing cultural venues, facilities and uses where appropriate and supporting the development of new cultural venues in Epsom Town Centre.~~ **Key supporting documents** Housing and Economic Development Needs Assessment (2023) Longmead and Kiln Lane Industrial Estates Economic Value Report (2022) Retail and Commercial Leisure Needs Assessment Update (2021)	combined for effectiveness and also reworded for the same reason Necessary for clarity and effectiveness to ensure policy is positively prepared Added key supporting documents after the policy for consistency	
MM68	87-88	Policy S10	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, residential, retail, leisure, entertainment facilities, intensive sport and recreation uses, offices, arts, culture and tourism development. **Policy S10: Retail Hierarchy and Network**	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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			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 Neighbourhood Parades (as shown on the policies map). ~~The wider retail network also includes other retailing locations across our area.~~ 2) The overall hierarchy and network is defined as follows: a) **Town Centre**: Epsom Town Centre b) **Local Centres**: Ewell Village and Stoneleigh Centre c) **Neighbourhood Parades**: • Castle Parade, Ewell • Chessington Road / Green Lanes • Chessington Road / Plough Road • Chessington Road / Ruxley Lane • Gatley Avenue / Ruxley Lane • Horton Local centre • Kingston Road / Bradford Drive • Kingston Road / Ruxley Lane • Manor Green Road, Epsom • Poole Road, Epsom • Pound Lane, Epsom • Rosebery Parade, Kingston Road • Vale Road, Worcester Park	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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			• Waterloo Road, Epsom		
MM69	89	Policy DM4	6.11. Within Epsom Town Centre, Commercial, Business and Service Use~~s (Class E of the use classes order)~~ are~~is~~ 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 at the planning application stage to avoid over concentration of a specific type of use. 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). 6.12. Within the local centres, a range of Commercial, Business and Service Uses ~~Class E uses~~ and other town centre uses will be supported and where the loss of a Commercial, Business and Service ~~Uses 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. **Policy DM4: Primary Shopping Areas and Retail Frontages** **Epsom Town Centre**	Use classes removed for effectiveness, additional text provided in the supporting text to clarify how we would assess Policy Criteria1b over concentration Changes necessary in order to make the policy positively prepared and effective	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			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: a) Within the primary frontage (as defined on the policies map) at ground floor level development within Commercial, Business and Service use ~~use class E~~ will normally be permitted; b) Within the secondary frontages (as defined on the Policies Map), at ground floor level, development within Commercial, Business and Service Use ~~Use Class~~ will normally be permitted. Sui Generis uses suited to a town centre, Learning and non-residential ~~Class F1 and~~ Institutions and Halls or meeting places for the principal use of the local community ~~Class F2(b)~~ will normally be permitted unless they result in an over concentration of those uses. c) Within the primary and secondary frontages, the effective and efficient use of upper floors for main town centre uses and ~~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. 2) Applications for the loss of Commercial, Business and Service ~~Class E~~ floorspace in the Epsom Town Centre Primary frontages will only be supported where it can be demonstrated that: a) There is no reasonable prospect of the site remaining in a Commercial, Business and Service ~~Class E~~ use;	Modified references to use classes in order to future proof the policy Necessary changes made in order to ensure the policy is effective	

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			b) Opportunities to reconfigure or reuse the site to retain its current use or another Commercial, Business and Service ~~Class E~~ use have been exhausted; c) The site has been marketed in accordance with Appendix 5; d) The proposed alternative use would not adversely affect the vitality and viability of the town centre. **Stoneleigh and Ewell Local Centres** 3) Within the Local Centres (as defined on the policies map) the Council will support: a)~~a~~ A range of Commercial, Business and Service uses ~~Use Class E~~ and other appropriate town centre uses b) Development proposals involving a change of use from Commercial, Business and Service use ~~Class E~~ 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 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		

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MM70	93-94	Policy DM6	~~6.20. The boundaries of the neighbourhood parades are shown on the Policies Map.~~ **Policy DM6: Neighbourhood Parades and Isolated Shops** 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: a) they are appropriate to the scale and function of the parade b) they maintain or enhance the vitality and viability of the parade c) if at ground floor level: i) they provide an active frontage, such as a shop front or window display, which is in keeping with the character of the centre/parade; ii) they would contribute to range of retail service and community uses which provide for the day to day needs of local people; and iii) The proposal does not result in an over concentration of a particular use. 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. 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.	Not necessary – wording to be included within policy wording Necessary to provide clarity and effectiveness, modified text to signpost to neighbourhood parades as defined in the policies map	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	**Policy DM7 – <u>Loss of</u> Employment Land** 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.~~ ~~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.~~ ~~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.~~ ~~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~~	Title modified, supporting text be modified to clarify it is specific to non-strategic employment sites outside of Longmead/Kiln La Deletion necessary to remove any unnecessary duplication from another policy Necessary for effectiveness	No. Loss of employment land is not anticipated to give rise to any new LSEs that may compromise European site integrity.

Agenda Item 4
Appendix 4

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?
			~~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.~~ 6.28. Policy S9 defines the boroughs strategic employment sites, which are safeguarded for employment generating uses. However, there are a wide range of ~~E~~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. **Policy DM7: Loss of Employment Land** ~~**Strategic Employment Sites**~~ ~~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.~~ ~~The development and intensification of these sites will be supported to provide floorspace for Employment Generating Uses that meets the needs of the market.~~ ~~**Outside of the Strategic Employment sites**~~	Deletion necessary to remove any unnecessary duplication from another policy	

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			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: a) there are no strong economic reasons to retain the Employment Use; b) there is no reasonable prospect of the site being retained in employment use evidenced by at least 12 months of continuous marketing evidence; and c) the site is no longer suitable for its existing use or other employment uses.	Added marketing period into the policy to ensure the policy is effective	
MM72	97-98	Policy DM8	**Policy DM8 – ~~Racehorse Training Zone~~ Epsom Downs Racecourse and the Racehorse Training Industry** 6.31. The borough has 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. 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	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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			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. Surrounding the racecourse ~~itself (as defined on the Policies Map)~~ are the nationally important racehorse training grounds, located in Epsom and Walton Downs which make a positive contribution to the economy and sporting heritage of the area. 6.32. There are several racehorse training ~~facilities / stable complexes~~ yards in the b~~B~~orough (and neighbouring boroughs) which are well-located to support the ongoing use of the training grounds. ~~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. The Racecourse Area and Racehorse Training Zone are located within the Green Belt. 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: • Enable the training of racehorses on the Downs until midday • Preserve the Downs in their natural state of beauty • Maintain public rights of access		site integrity are foreseen.

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			• Ensure that the various users respect each other's rights and the Down environment 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. ~~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.~~ 6.33. 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 racehorse training yards, development should be designed in line with the British Horseracing Authority's requirements.		

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			3 new paragraphs inserted following para 6.33 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. 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. ~~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.~~ ~~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.~~ **Policy DM8: ~~Racehorse Training Industry~~ Epsom Downs Racecourse and Racehorse Training Industry**		

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			Racecourse Area Within the extent of the racecourse area, as defined ~~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. This may include suitable non-racing development to support the long-term viability of the racecourse. **Racehorse Training Zone** Within the Racehorse Training Zone, as defined ~~identified~~ on the Policies Map: Proposals which facilitate the long-term or future use of the site for the racehorse training industry and/or as a racehorse training yard ~~racing stable and/or for the racehorse training industry~~ will be supported, 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. Any proposals resulting in the loss of specific facilities which would support the long term or future use of the site as a racehorse training yard ~~racing stable~~ will be resisted. 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:		

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			i) Marketing of the site for the horse racing sector has taken place for a period of at least 24~~18~~ months, at a reasonable market value with a recognised agent specializing in the racing sector property market; and, ii) 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~~ **Racehorse Movement Corridor** ~~Any~~ll proposal~~s~~, ~~regardless of the type of development,~~ should demonstrate that ~~it~~ they will not adversely affect the 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~~ by virtue of the traffic generation from or the design of the development and provide mitigation where there is an impact. 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.		

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MM73	99-100	Policy DM9	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.~~ which are well served by public transport, this includes proximity to rail stations or frequent bus services. ~~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.~~ **Policy DM9: Visitor Accommodation** 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 which are well served by public transport ~~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: a) they are acceptable in terms of access, parking, highway safety, traffic generation, pedestrian and cycle movements; and b) there is no permanent loss of residential dwellings; and	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 Necessary for clarity and effectiveness to modify part 1 to clarify the locations where visitor accommodation will be granted Added text to clarify that the policy applies to the permanent loss of residential to take	No. The change introduces no further LSEs that may compromise European site integrity.

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			c) the accommodation will not result in an unacceptable level of noise and disturbance to nearby residents. 3) Planning permission will only be granted for proposals that result in the loss of visitor accommodation and other short stay accommodation when any of the following criteria are met: 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 b) evidence of non-viability is submitted.	into account short term/temporary forms of visitor accommodation	
MM74	101-102	Policy S11	**S11 Design <u>and Heritage</u>** <u>7.1. High quality</u> d~~D~~esign is essential to retaining the borough's distinct sense of place, as stipulated in the plan's vision and strategic objectives. <u>In addition to</u> ~~As well as~~ <u>the appearance</u> of ~~how~~ development <u>~~"looks"~~</u> 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. *Three new paragraphs to be inserted following para. 7.1* <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>	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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			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. 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. 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:~~ • ~~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~~	Necessary additions for effectiveness as Policy S13 Heritage will be deleted and combined with this policy Deleted text as density standards moved to policy wording to ensure policy is positively prepared	

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			~~• 40 dwellings per hectare in the remaining defined urban area as defined on the policies map other urban areas.~~ 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. 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. **S11 Design and Heritage** ~~The design of development~~ The Council will require high quality and appropriate design from development of all scales (including extensions, alterations and	Necessary for effectiveness and to ensure that the supporting text aligns with national policy	

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			conversions). Proposals should be appropriate in relation to the character, appearance and functioning of the built and natural environment by: ~~a) making efficient use of land; and~~ a) Optimising the potential of the site to accommodate an appropriate amount and mix of development b) being of appropriate use, scale, mass, proportion, detailing, material, layout and siting; and 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 d) respecting the scale, appearance, building lines and location of buildings, spaces and visual amenity of the surrounding area; and 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 f) creating a sense of place through provision of attractive soft landscaping and open space where appropriate; and g) maximising opportunities for natural security through layout and design by incorporating secured by Design Standards; and	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	

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			h) demonstrating how the scheme has been developed in accordance with the principles set out in the National Model Design Code and ~~c)~~ i) maximising opportunities for integrating passive design principles, including orientation, glazing and shading. ~~d)~~ i) where appropriate, providing well structured, practical and attractive areas of soft landscaping and open space. 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: i. Epsom Town Centre (as defined on the policies map) 80 dwellings per hectare 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 iii. The remaining urban area (as defined on the policies map) 40 dwellings per hectare 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 **Key supporting documents**	Key supporting document added for	

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			• National Model Design Code	consistency with other policies	
MM75	103	Policy S12	**DM24 ~~S12~~ Amenity Protection** 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.~~ **DM24 ~~S12~~ Amenity Protection** 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~~: 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 Mitigate privacy and overlooking through the provision of a minimum separation distance of 20m between residential properties unless it can be demonstrated that	Changed from strategic to non-strategic policy as the policy does not meet the relevant tests of the Framework Removed text as now moved to policy wording to ensure it is effective Moved reference to separation distances from supporting text to ensure the policy is effective Changes made to the policy to ensure it is positively prepared, effective and consistent with national policy	No. The change introduces no further LSEs that may compromise European site integrity.

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			there would be no harm to residential amenity and / or it would prevent the efficient use of land in sustainable location; and ~~a)~~ Limit the loss of ~~privacy,~~ daylight, and sunlight; and ~~b~~) Mitigate the impacts of: i) N~~n~~oise, vibration, ~~light, heat, smell and airborne emissions consisting of~~ odour, fumes, ~~smoke, soot, ash,~~ dust and ~~grit; and~~ artificial light, and ~~c~~)ii) ~~activity levels and t~~Traffic movements to, from ~~generation~~; and within the site ~~d) security of property and personal safety.~~ **Key supporting documents** National Model Design Code Building Research Establishment - A Good Practice Guide for site layout planning for daylight and sunlight.	Added key supporting documents added for effectiveness	
MM76	104-105	Policy DM10	**Policy DM10 – Building Emissions and Energy Standards** **Policy DM10: Building Emissions and Energy Standards**	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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			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. All proposals should consider opportunities to provide solar PV and energy storage. 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: ~~a~~i) Space heating demand less than 30kWh/m2/annum ~~b~~ii) Total energy use less than 40kWh/m2/annum; and ~~c~~iii) On-site renewable energy generation to match the total energy use, with a preference for roof mounted solar PV. 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. All non-residential development must achieve a minimum of BREEAM 'Excellent' UK New Construction standard or equivalent, or any equivalent new standard. This		

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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	7.17. The policy requires that new dwellings, as a minimum, meet the tighter Building Regulations optional water efficiency requirement of 110 litres per person per day or any increased standard that may be introduced in the future, this is a continuation of ~~current~~ previous policy in the borough. 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'. **Key supporting documents** Approved Document G: sanitation, hit water safety and water efficiency	Necessary modifications supporting text to ensure policy is effective Modified to include Key document - consistent with other policies	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	**Key supporting documents** The Surrey Health and Well-Being Strategy Surrey Health Impact Assessment Guidance Statement	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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			Joint Strategic Needs Assessment (JSNA) contains a wealth of health data.		
MM79	108	Policy S13	~~**Policy S13 – Preserving identity of place with heritage**~~ ~~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.~~ ~~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.~~ ~~**Policy S13: Preserving identity of place with heritage**~~ ~~1) Development will be permitted where as far as possible, it enhances the borough's cultural, historic, architectural and townscape character.~~ ~~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.~~	Policy deleted as matters adequately addressed by policy S11	No. Policy deletion 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?
			~~**Key supporting documents**~~ ~~• 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 6~~5~~, 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	**Policy DM14: Shopfronts** The design of new shopfronts and other commercial signage and the re-design of existing shopfronts and commercial signage should demonstrate: respect for the architecture and features of the buildings in or on which they are set and the character of the area; public safety would not be prejudiced; visual pollution and clutter are avoided; the proposal will provide an 'active street front'.	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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			Shopfront Design should accord with the Council's guidance for shopfronts: 'Shopfront Design Guide' ~~or any future revisions to this document.~~ The Council will resist the removal of shopfronts of architectural or historic interest. 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).		
MM82	112	Policy DM15	**Policy DM15 – Green Belt** 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:~~ ~~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.~~ 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.	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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			Two new paragraphs inserted after para. 7.39. The Green Belt is very important to Epsom & Ewell as it: positively contributes to the boroughs identity, character and appearance; prevents coalescence with other settlements to the west, east and south; 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, 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, 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. 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:~~ ~~**Extensions or alterations**~~		

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			~~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.~~ ~~**Replacement buildings**~~ ~~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.~~ 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. **Policy DM15: Green Belt** **Green Belt** ~~1) Development in the Green Belt will be considered inappropriate, and will not be permitted unless:~~		

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			~~a) the development itself is an exception to the definition of "inappropriate" as defined by the National Planning Policy Framework; or~~ ~~b) there are very special circumstances to justify the inappropriate development.~~ ~~2) Very special circumstances are circumstances where other considerations clearly outweigh the harm to the Green Belt as a result of the development.~~ 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. **Replacement and Extension of Buildings in the Green Belt** 2) The Council will permit the replacement of a building in the Green Belt provided the new building: a) would be in the same use; and b) is not materially larger than the one it replaces; and 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		

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			d) does not have a materially greater impact on the openness of the Green Belt. 3) The Council will permit the extension and alteration to a building in the Green Belt provided the additional development: a) is not disproportionate, over and above the size of the original building; and b) does not have a materially greater impact on the openness of the Green Belt. **Infill or redevelopment of previously developed land in the Green Belt** 4) The Council will permit limited infilling of previously development land in the Green Belt provided the development: a) does not have a materially greater impact on the openness of the Green Belt; or 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.		
MM83	115	Policy S14	*New paragraph after para. 7.49.* 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. 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	Additional text necessary to ensure the policy is effective Clarification the contribution made by blue infrastructure to	No. The change introduces no further LSEs that may compromise European site integrity.

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			construction methods, such as green roofs, and the provision of suitable appropriate native species in landscaping. **Policy S14: Biodiversity and Geodiversity** 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: 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>.	ensure the policy is effective Necessary modification part e to be positively prepared Amendment to clarify the importance of mitigation necessary for the policy to be positively prepared	

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			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 mitigation and/or compensation will be sought. 3) Effective avoidance, mitigation and compensation will be secured through the imposition of planning conditions or planning obligations as appropriate, including monitoring for the effectiveness of these measures. **Key supporting documents** • 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	**Policy ~~S15~~ DM25 – Biodiversity Net Gain** 7.53. This policy will require at least 10% BNG on qualifying development proposals and 20% BNG from seven greenfield site allocations SA33 -SA35 and SA48 -51 where the~~. This~~ higher requirement is detailed in the site allocation policy.	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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			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 or on unallocated sites that lie outside the urban area as defined on the policies map) 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. ~~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~~ **Policy ~~S15~~DM25: Biodiversity Net Gain** 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 be achieved (unless a higher requirement has been specified in a site allocation policy or on unallocated sites that lie outside the urban area as defined on the Policies Map). 2) Biodiversity net gain should be delivered using the following hierarchy (note this does not apply to irreplaceable habitats): a) On-site as part of the development which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity	remove unnecessary duplication. Modified for effectiveness the site allocations outside the urban area require 20% BNG Remove supporting text as not justified Necessary for clarity and effectiveness Modified text to accord with national policy Criteria b and c modified for clarity	

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			metric), the avoidance of adverse effects from development and, if they cannot be avoided, the mitigation of those effects; and 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; ~~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.~~ 3) Biodiversity net gain will be secured by planning condition, legal agreement or a conservation covenant, as appropriate. **Key supporting documents** 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 ~~M~~metric tools and guides~~:~~ ~~https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides~~	Supporting documents added/removed for consistency and to ensure policy is positively prepared	

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?
			~~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		
MM85	119-120	DM17	**Policy DM17: Trees, Woodlands and Hedgerows** Development proposals will be permitted where: 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 reasons ~~circumstances~~ and a suitable compensation strategy ~~appropriate planting~~ to mitigate the loss in biodiversity and natural asset is proposed 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). **c)** they make provision for new streets to be tree lined and new ~~street trees 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.	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 Modification to reflect national policy and Standing Advice from Natural England	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?
				regarding buffers to ensure root protection	
MM86	121-123	Policy S16	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 30~~20~~ year fluvial flood risk or greater (>3.3~~5~~ % Annual Exceedance Probability (AEP)~~, which is also as consistent as possible with most other Local Planning Authorities in Surrey.~~. 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. 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. 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~~.	Necessary modification to correct the number of years from 20 to 30 year fluvial flood risk for effectiveness Necessary to ensure consistency with national policy	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?
			Insert new paragraph after paragraph 7.70 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. **Policy S16: Flood Risk and Sustainable Drainage** Development will be permitted where: 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),~~ ~~S~~sequential and subsequent exception tests have been passed in line with national policy and guidance. 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.	Necessary modification on SuDs to align with national policy Necessary modifications to align with national policy	

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			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). e) Finished floor levels are set 300mm above the climate change flood level ~~(~~as defined in the SFRA~~)~~. 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. 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. h) It does not result in the culverting of main rivers. 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. j) Sustainable drainage systems are installed which follow the drainage hierarchy of:		

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			i. storing rainwater for later re-use; ii. use infiltration techniques; iii. attenuate rainwater in ponds or open water features for later gradual release; iv. discharge rainwater directly to a watercourse; v. discharge rainwater to a land drain, highway drain or surface water sewer; vi. discharge rainwater to a combined sewer. 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 **Key supporting documents** 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~~ ~~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~~		

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?
			Surrey Local Flood Risk Management Strategy 2017 Planning Practice Guidance – Flood Risk and Coastal Change ~~2022~~ National standards for sustainable drainage systems (SuDS) 2025 ~~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	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).~~ Phasing conditions could be used where necessary to align the occupation of development with delivery of off-site infrastructure upgrades. 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. 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.~~ 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	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. Delete wording regarding funding which needs to be within the policy itself to be effective Modified to clarify that infrastructure provision could be phased for large development and	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?
			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. **Policy S17: Infrastructure Delivery** 1) 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~~. ~~2)~~ Infrastructure must be provided at the appropriate time, prior to the development becoming occupied or becoming operational. For ~~l~~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.~~ 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.	aligned with infrastructure upgrades to ensure the policy is justified. Additional clarification in relation to loss of specific infrastructure Delete last sentence from 8.5 for clarity to ensure an effective policy Changes are necessary for clarity and effectiveness and to remove unnecessary duplication. Text modified to clarify that the policy applies to certain types of development and that funding needs to be secured and what	

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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	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, footpaths and shared surfaces, green and sustainable drainage systems. 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. *2 new paragraphs in-between para. 8.9 & 8.10:* 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	Text modified to clarify that future management arrangements should be secured to ensure the policy is effective	No. The change introduces no further LSEs that may compromise European site integrity.

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			infrastructure network and proposals will, be expected to make such provision at a scale that is commensurate with the development. 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. **Policy S18: Green and Blue Infrastructure** ~~1.~~ Development will be supported provided that: 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; b) it protects and enhances the green and blue infrastructure network, through provision of appropriate green or blue infrastructure features ~~within the network~~; 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.	Modified for effectiveness with additional text to clarify and emphasise the connectivity to the wider network beyond the site Modification to c) to make clear that loss should be replaced	

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			c) any loss or adverse impacts on the green and blue infrastructure network are fully mitigated through the replacement / provision of green infrastructure of equivalent or better value on-site or, where feasible, through appropriate off-site compensatory measures; and d) where new green infrastructure is provided within new development, suitable arrangements are in place for its future funding, maintenance and management. This could be through seeking contributions from developers or through a site management company, where appropriate. ~~2) Development proposals that would result in the loss 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~~ **Key Supporting Documents** National Model Design Code Natural England Green Infrastructure Framework Surrey County Council Green and blue Infrastructure: best practice case studies Natural England Green Infrastructure Framework	Modified for effectiveness for relevant supporting documents added including Natural England's GI Framework Relevant supporting documents added for consistency and to ensure the policy is positively prepared	
MM89	129-131	Policy DM19	**Policy DM19 – Open Spaces, Outdoor 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.

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?
			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. 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 S~~U~~uDS. 8.13. The council's evidence base studies have found that generally there is a good range of accessible public open space~~s , 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. 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. 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). 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 is that such land should not be built on unless it is clearly shown to be	outdoor sports and moved reference to indoor facilities to DM20 to ensure consistency with national policy Other modifications for clarity and effectiveness	

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			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~~. 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. 8.16. Where appropriate, ~~A~~all new development is expected to contribute towards the provision/maintenance (~~and where appropriate, maintenance~~) of infrastructure, which includes open spaces, sports and recreational facilities. **Policy DM19: Open Spaces, Outdoor Sport and Recreation** 1) Proposals which complement and enhance the value and use of open spaces for recreation, biodiversity and/or nature conservation and climate change adaptation/mitigation will be considered favourably. 2) Proposals for new and improved, refurbished, replacement or extended outdoor sports/facilities ~~indoor~~ and ancillary buildings ~~built sport and recreational facilities~~ must be of high quality, and optimise accessibility to all users and where appropriate, maximise wider community benefit through the utilisation of measures such as community use agreements. 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	Modified to clarify that the policy applies to outdoor sports For conciseness, substituted open space with provision in criteria 3, removed reference to audit in criteria 3 in order to future proof 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?
			be an integral part of the development and have in place appropriate long term stewardship arrangements to secure the quality of ~~the open space~~ this provision in perpetuity. 4) Provision standards should be ~~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.~~ 5) Proposals which result in a loss of open space and/or outdoor sport and recreational buildings/land will only be considered where supported by robust evidence and will be assessed in line with national policy. 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. **Key Supporting Documents** Open Space Audit (2024) Playing Pitch Strategy (2021)	policy. Changes made to ensure the policy is consistent with national policy and effective Title for supporting documents amended and additional document added for consistency	

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			Sports Facilities Assessment (2020) Epsom and Ewell Infrastructure Delivery Plan		
MM90	132-133	Policy DM20	**Policy DM20 – Social Infrastructure and Community ~~and Cultural~~ Facilities** 8.20. Social infrastructure and ~~C~~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.~~ *New paragraph in-between para. 8.21 and 8.22* 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	Modified title for clarity and effectiveness 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 Modified text for effectiveness to promote reuse and maximising use of existing facilities.	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			8.22. New provision should be located in sustainable locations, ensuring good accessibility by a wide range of travel modes. Buildings and facilities should be flexible and adaptable. Where appropriate Community Use Agreements (CUA) will be sought to achieve wider community use of facilities. 8.23. The council will require any loss to be fully justified, with marketing undertaken in accordance with the requirements of Appendix 5~~.~~, 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. **Policy DM20: Social Infrastructure and Community ~~and Cultural~~ Facilities** 1) Planning permission will be permitted for new or extensions/enhancements to existing community and cultural facilities provided that: a) there is a demonstrable identified need; b) it is in a location that is well served by public transport and accessible by walking and cycling; ~~and~~ c) it is delivered in flexible and adaptable building/s which could accommodate other social infrastructure/community uses where practicable, to encourage efficient use of land through mixed use and increased public access~~.~~; and	Additional text to promote community use agreements for wider community use to ensure policy is effective in this regard Modified text for clarity and effectiveness Social Infrastructure and Community facilities have been defined in the glossary Additional text to promote community use agreements for wider community use Added Sports Facilities Assessment under key supporting documents	

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

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			~~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.~~ ~~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.~~ ~~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.~~ ~~8.28. The council will support investment in the existing educational infrastructure to ensure facilities continue to support changing needs and demands.~~ ~~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.~~ ~~**Policy DM21: Education Infrastructure**~~	DM20, remove to avoid duplication.	compromise European site integrity.

<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy no./ Para no.</th><th>Main Modification</th><th>Reason for modification</th><th>Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?</th></tr>
<tr><td></td><td></td><td></td><td>~~1) Development proposals for the intensification and enhancement of established education facilities in the borough will be supported.~~

~~2) Proposals which maximise the extended or multiple use of educational facilities for community or recreational use will be supported.~~

~~**Key supporting documents**~~
~~• Epsom and Ewell Infrastructure Delivery Plan~~</td><td></td><td></td></tr>
<tr><td>MM92</td><td>136</td><td>Policy DM22</td><td>8.38. Aerodrome safeguarding is a legal requirement to ensure the safe operation of aerodromes, such as Heathrow~~, and~~, Gatwick Airport and Kenley Aerodrome, 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.
8.40. The aerodrome safeguarding area extends to cover a zone broadly within 55~~30~~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.</td><td>Modification to the supporting text to include Kenley Aerodrome recommended by Defence Infrastructure Organisation
Amended safeguarding zone from 30km to 55km as recommended by Gatwick Airport</td><td>No. The change introduces no further LSEs that may compromise European site integrity.</td></tr>
<tr><td>MM93</td><td>139</td><td>Policy S1</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Net additional dwelling completions</td><td>Annual target – ~~average of at least~~</td><td>Planning decisions and appeals</td></tr></table></td><td>Modified to reflect increased housing supply and trajectory.</td><td>No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no</td></tr>
</table>

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?
				~~TBC dpa in line with current trajectory.~~ 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) Plan target – delivery of at leas t ~~4,700~~ 6,012 dwellings over the plan period (2022-2040)	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	at least 1~~8~~0 pitches over the Local Plan period ~~(as per need identified in the GTAA)~~	Planning decisions and appeals that deliver additional gypsy and traveller pitches Monitoring data		
				~~The amount of~~ net employment floorspace ~~permitted and completed each year~~	Plan target - at least 41,464 sqm of additional employment floorspace	Planning decisions and appeals that result in a loss or gain in employment floorspace		

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<tr><td></td><td></td><td></td><td><table>
<tr><td></td><td><s>Assess trends against identified needs in the HEDNA</s></td><td>Monitoring data

CoStar platform or similar real estate information company at local plan review stage</td></tr>
<tr><td><s>The amount of net</s> Change in retail floorspace <s>permitted and completed each year</s></td><td>No specific target

<s>Assess trends against identified needs in the retail study</s></td><td>Planning decisions and appeals that result in a net loss of retail floorspace

Monitoring data</td></tr>
</table></td><td></td><td></td></tr>
<tr><td>MM94</td><td>139</td><td>Policy S2</td><td><table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
<tr><td><s>Number of planning applications refused</s></td><td><s>n/a</s></td><td><s>Planning applications and appeals</s></td></tr>
<tr><td>Number of planning applications permitted that do not fully comply with</td><td>No specific targets
<s>n/a</s></td><td>Planning applications and appeals</td></tr>
</table></td><td>Necessary for effectiveness</td><td>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</td></tr>
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			policy requirements following a viability review.		no further LSEs that may compromise European site integrity are foreseen.
MM95	140	Policy S3	Indicators / Annual Target / Plan Period Target / Data source ~~Number of residential schemes that comply/that do not comply with the policy requirements~~ Strategic Policy that will be monitored through indicators of more detailed DM policies / No specific targets ~~n/a~~ / ~~Planning decisions and appeals~~ Authority Monitoring Report	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
MM96	140	Policy S4	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

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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> <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>		proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM97	140	Site Allocation- SA1 to SA35	~~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.
MM98		SA1 Southern Gas Network Site	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

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<tr><td></td><td></td><td></td><td><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></td><td></td><td>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.</td></tr>
<tr><td>MM99</td><td></td><td>SA2 Hook Road Car Park</td><td><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></td><td>Necessary for effectiveness</td><td>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.</td></tr>
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<tr><td>MM100</td><td></td><td>SA3 Solis House, 20 Hook Road</td><td><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></td><td>Necessary for effectiveness</td><td>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.</td></tr>
<tr><td>MM101</td><td></td><td>SA4 Bunzl, Hook Road</td><td><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></td><td>Necessary for effectiveness</td><td>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</td></tr>
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<tr><td>MM102</td><td></td><td>SA5 Epsom Town Hall</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></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></td><td>Necessary for effectiveness</td><td>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.</td></tr>
<tr><td>MM103</td><td></td><td>SA6 Hope Lodge Car Park</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table></td><td>Necessary for effectiveness</td><td>No. Potential implications of the allocation of a higher quanta of sites were assessed in the</td></tr>
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<tr><td>MM104</td><td></td><td>SA7 Former Police and Ambulance Station Site</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of at least 85 residential, nursing and dementia care bedrooms for the elderly</td><td>Delivery of development by 2028 in accordance with the trajectory</td><td>Planning appeals and decisions

Monitoring data</td></tr></table></td><td>Necessary for effectiveness</td><td>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</td></tr>
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<tr><td>MM105</td><td></td><td>SA8 Epsom Clinic</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></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>

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<tr><td>MM106</td><td></td><td>SA9 Depot Road and Upper High Street Car Park</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></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></td><td>Necessary for effectiveness</td><td>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</td></tr>
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			<table><tr><td></td><td>in accordance with the trajectory</td><td>Monitoring data</td></tr></table>		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>Delivery of at least 34 dwellings</td><td>Delivery of development by 2029 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	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.

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<tr><td>MM108</td><td></td><td>SA11 Finachem House</td><td><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></td><td>Necessary for effectiveness</td><td>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.</td></tr>
<tr><td>MM109</td><td></td><td>SA12 Global House</td><td><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></td><td>Necessary for effectiveness</td><td>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</td></tr>
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<tr><td>MM110</td><td></td><td>SA13 Swail House</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><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></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></td><td>Necessary for effectiveness</td><td>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.</td></tr>
<tr><td>MM111</td><td></td><td>SA14 60 East Street</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr></table></td><td>Necessary for effectiveness</td><td>No. Potential implications of the allocation of a higher quanta of sites were assessed in the</td></tr>
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			<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 / 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	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

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<tr><td>MM113</td><td></td><td>SA16 Land at Kiln Lane</td><td><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></td><td>Necessary for effectiveness</td><td>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.</td></tr>
<tr><td>MM114</td><td></td><td>SA17 Hatch Furlong Nursery</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table></td><td>Necessary for effectiveness</td><td>No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the</td></tr>
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<tr><td></td><td></td><td></td><td><table><tr><td>Delivery of at least 30 dwellings</td><td>Delivery of development by 2031 in accordance with the trajectory</td><td>Planning appeals and decisions

Monitoring data</td></tr></table></td><td></td><td>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.</td></tr>
<tr><td>MM115</td><td></td><td>SA18 Land to the rear of Rowe Hall</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of an extra care accommodation to provide at least 96 self contained apartments, staff and communal facilities</td><td>Delivery of development by 2029 in accordance with the trajectory</td><td>Planning appeals and decisions

Monitoring data</td></tr></table></td><td>Necessary for effectiveness</td><td>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</td></tr>
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<tr><td>MM116</td><td></td><td>SA19 7 Station Approach</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></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>

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<tr><td>MM117</td><td></td><td>SA20 Esso Express, 26 Reigate Road</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr></table></td><td>Necessary for effectiveness</td><td>No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the</td></tr>
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			<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.
MM118		SA21 Richards Fields Car Park	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

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<tr><td>MM119</td><td></td><td>SA22 Etwelle House, Station Road</td><td><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 2028 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u>

<u>Monitoring data</u></td></tr></table></td><td>Necessary for effectiveness</td><td>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.</td></tr>
<tr><td>MM120</td><td></td><td>SA24 Garages at Somerset Close and</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr></table></td><td>Necessary for effectiveness</td><td>No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the</td></tr>
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<tr><td>MM121</td><td></td><td>SA25 64 South Street</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of at least 6 dwellings</td><td>Delivery of development by 2030 in accordance with the trajectory</td><td>Planning appeals and decisions

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<tr><td>MM122</td><td></td><td>SA26 35 Alexandra Road</td><td><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>

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<tr><td>MM123</td><td></td><td>SA27 22-24 Dorking Road</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table></td><td>Necessary for effectiveness</td><td>No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the</td></tr>
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<tr><td>MM124</td><td></td><td>SA28 63 Dorking Road</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of at least 6 dwellings</td><td>Delivery of development by 2029 in accordance with the trajectory</td><td>Planning appeals and decisions

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<tr><td>MM125</td><td></td><td>SA30 Epsom General Hospital</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 305 units if older people's accommodation</u>

<u>Delivery of at least 24 key worker dwellings</u></td><td><u>Delivery of development by 2029</u></td><td><u>Planning appeals and decisions</u>

<u>Monitoring data</u></td></tr><tr><td></td><td></td><td></td></tr></table></td><td>Necessary for effectiveness</td><td>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.</td></tr>
<tr><td>MM126</td><td></td><td>SA31 Land at West Park Hospital (South)</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table></td><td>Necessary for effectiveness</td><td>No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the</td></tr>
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<tr><td>MM127</td><td></td><td>SA32 Land at West Park Hospital (North)</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of at least 180 dwellings</td><td>Delivery of development by 2032 in accordance with the trajectory</td><td>Planning appeals and decisions

Monitoring data</td></tr></table></td><td>Necessary for effectiveness</td><td>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</td></tr>
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<tr><td>MM128</td><td></td><td>SA33 Land at Land at Chantilly Way</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></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></td><td>Necessary for effectiveness</td><td>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.</td></tr>
<tr><td>MM129</td><td></td><td>SA34 Hook Road Arena</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></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></td><td>Necessary for effectiveness</td><td>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</td></tr>
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<tr><td></td><td></td><td></td><td><table>
<tr><td></td><td>in accordance with the trajectory</td><td>Monitoring data</td></tr>
<tr><td>Delivery of a new sports hub to include playing pitches, a new pavilion and changing facilities</td><td>Delivery of development by 2033</td><td>Planning appeals and decisions

Monitoring data

Infrastructure Delivery Plan</td></tr>
</table></td><td></td><td>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.</td></tr>
<tr><td>MM130</td><td></td><td>SA35 Land at Horton Farm</td><td><table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
<tr><td>Delivery of at least 1,250 dwellings including some specialist accommodation</td><td>Delivery of development by 2040 in accordance with the trajectory</td><td>Planning appeals and decisions

Monitoring data

Infrastructure Delivery Plan</td></tr>
</table></td><td>Necessary for effectiveness</td><td>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</td></tr>
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<tr><td></td><td></td><td></td><td><table>
<tr><td>Delivery of at least 10 gypsy and traveller pitches</td><td>Delivery by 2035</td><td>Planning appeals and decisions

Monitoring data</td></tr>
<tr><td>Delivery of community building</td><td>Delivery by 2035</td><td>Planning appeals and decisions

Monitoring data

Infrastructure Delivery Plan</td></tr>
<tr><td>Delivery of a public park of approximately 7ha</td><td>Delivery by 2035</td><td>Planning appeals and decisions

Monitoring data

Infrastructure Delivery Plan</td></tr>
</table></td><td></td><td>site integrity are foreseen.</td></tr>
<tr><td>MM131</td><td></td><td>SA36 25 Alexandra Road Epsom</td><td><table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
</table></td><td>Necessary for effectiveness</td><td>No. Potential implications of the allocation of a higher quanta of sites were assessed in the</td></tr>
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<tr><td></td><td></td><td></td><td><table><tr><td>Delivery of at least 11 dwellings</td><td>Delivery of development by 2036 in accordance with the trajectory</td><td>Planning appeals and decisions

Monitoring data</td></tr></table></td><td></td><td>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.</td></tr>
<tr><td>MM132</td><td></td><td>SA37 Gainsborough Road Estate</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of at least 8 dwellings</td><td>Delivery of development by 2032 in accordance with the trajectory</td><td>Planning appeals and decisions

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<tr><td>MM133</td><td></td><td>SA38 Parking at 54 Gainsborough Road</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></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>

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<tr><td>MM134</td><td></td><td>SA39 85b Hook Road Epsom</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></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></td><td>Necessary for effectiveness</td><td>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</td></tr>
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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>Delivery of at least 38 dwellings</td><td>Delivery of development by 2040 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	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.

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<tr><td>MM136</td><td></td><td>SA41 Conservative Club, Epsom Club and Church</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></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></td><td>Necessary for effectiveness</td><td>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.</td></tr>
<tr><td>MM137</td><td></td><td>SA42 TK Maxx</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></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>

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<tr><td>MM138</td><td></td><td>SA43 Land R/O The Albion Public House (Mccaffertys Bar)</td><td><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>

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<tr><td>MM139</td><td></td><td>SA44 Spread Eagle</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table></td><td>Necessary for effectiveness</td><td>No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no</td></tr>
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<tr><td>MM140</td><td></td><td>SA45 Auction House</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of at least 10 dwellings</td><td>Delivery of development by 2040 in accordance with the trajectory</td><td>Planning appeals and decisions

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<tr><td>MM141</td><td></td><td>SA46 Laine Theatre Arts</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></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>

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<tr><td>MM142</td><td></td><td>SA47 Eclipse Business Park, West Hill</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></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></td><td>Necessary for effectiveness</td><td>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</td></tr>
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MM143		SA48 Cuddington Glade	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of a 70 bed Care Home</td><td>Delivery of development by 2029 in accordance with the trajectory</td><td>Planning appeals and decisions Monitoring data</td></tr></table>	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.

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<tr><td>MM144</td><td></td><td>SA49 Land off Cuddington Glade</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></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>

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<tr><td>MM145</td><td></td><td>SA50 Land at Priest Hill</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></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>

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<tr><td>MM146</td><td></td><td>SA51 Downs Farm</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></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></td><td>Necessary for effectiveness</td><td>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.</td></tr>
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<table>
<tr><td>~~Annual~~ Cumulative housing mix ~~delivery (and cumulatively over the plan period)~~ for market housing</td><td>Approximate proportions:
1 bed – 10%
2 bed – 35%
3 bed – 35%
4 bed – 20%</td><td>Planning appeals and decisions

Monitoring data</td></tr>
<tr><td>~~Annual~~ Cumulative housing mix ~~delivery (and cumulatively over the plan period)~~ affordable home ownership</td><td>Approximate proportions:
1 bed – 20%
2 bed – 40%
3 bed – 30%
4 bed – 10%</td><td>Planning appeals and decisions

Monitoring data</td></tr>
<tr><td>~~Annual~~ Cumulative housing mix ~~delivery (and cumulatively over the plan period)~~ affordable housing (rented)</td><td>Approximate proportions:
1 bed – 10%
2 bed – 35%
3 bed – 35%
4 bed – 20%</td><td>Planning appeals and decisions

Monitoring data</td></tr>
</table>
</td><td></td><td>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.</td></tr>
<tr><td>MM148</td><td>141</td><td>Policy S6 Affordable housing</td><td>
<table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
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<table>
<tr><td>Number of affordable dwellings granted consent</td><td>Approx ~~1250~~ 1675 over Local Plan Period</td><td>Planning decisions and appeals

Authority Monitoring Report</td></tr>
<tr><td>Number of planning decisions ~~including appeals allowing a lower level of affordable provision than set out in the policy.not compliant with policy S6.~~</td><td>n/a</td><td>Planning decisions and appeals</td></tr>
<tr><td>Number of affordable home completions (and as a % of total net completions)</td><td>n/a</td><td>Planning decisions and appeals
Authority Monitoring Report</td></tr>
<tr><td>Number of households on the Housing Register</td><td>Reducing over the plan period</td><td>Housing register</td></tr>
</table>
</td><td></td><td>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.</td></tr>
<tr><td>MM149</td><td>142</td><td>Policy S7 Specialist housing</td><td>
<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>
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</td><td>Necessary for effectiveness</td><td>No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the</td></tr>
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<tr><td>appeals allowing specialist accommodation</td><td>other proposals consistent with the requirements of policy S7.</td><td>Authority Monitoring Report</td></tr>
<tr><td>Number of specialist dwellings lost</td><td>No net loss of plan period.</td><td>Planning appeals and decisions
Authority Monitoring Report</td></tr>
<tr><td>Number of additional specialist dwellings and bedrooms</td><td>~~n/a~~ Increase in specialist accommodation over the plan period to assist in meeting identified needs

Elderly and Extra Care

Student accommodation</td><td>Completions, planning appeals and decisions

Authority Monitoring Report</td></tr>
</table>
</td><td></td><td>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.</td></tr>
<tr><td>MM150</td><td>143</td><td>Policy S8 Gypsies, Travellers and</td><td>
<table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
</table>
</td><td>Necessary for effectiveness</td><td>No. Potential implications of the allocation of a higher quanta of sites were assessed in the</td></tr>
</table>

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<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy no./ Para no.</th><th>Main Modification</th><th>Reason for modification</th><th>Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?</th></tr>
<tr><td></td><td></td><td>Travelling Showpeople</td><td><table>
<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></td><td></td><td>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.</td></tr>
<tr><td>MM151</td><td>143</td><td>Policy S9 Economic Development</td><td><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>
<tr><td>Increase in floorspace in economic use at</td><td>34,500sqm of additional floorspace to be delivered on</td><td>Planning decisions and appeals</td></tr>
</table></td><td>Necessary for effectiveness</td><td>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</td></tr>
</table>

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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~~		
			Loss/gain of floorspace and land in use by the racecourse and racehorse training sector	No net loss over plan period.	Planning decisions and appeals Authority Monitoring Report		
			Loss/gain of floorspace and land in use the creative and cultural sector and further and higher education providers	No net loss over plan period.	Planning decisions and appeals Authority Monitoring Report		

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

<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy no./ Para no.</th><th>Main Modification</th><th>Reason for modification</th><th>Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?</th></tr>
<tr><td></td><td></td><td>Centre Proposals</td><td><table><tr><td>Number of planning decisions including appeals allowing main town centre uses outside of the centres</td><td>~~Assess trends~~ No specific target. Monitoring Only</td><td>Planning decisions and appeals</td></tr></table></td><td></td><td></td></tr>
<tr><td>MM155</td><td>144</td><td>Policy DM6 Edge of Centre or Out of Centre Proposals</td><td><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~~ No specific target. Monitoring Only</td><td>Planning decisions and appeals</td></tr></table></td><td>Necessary for effectiveness</td><td>No. The change introduces no further LSEs that may compromise European site integrity.</td></tr>
<tr><td>MM156</td><td>144</td><td>Policy DM7 Loss of Employment Land</td><td>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>Plan target - at least 41,464 sqm of additional employment floorspace
~~Assess trends~~</td><td>Planning decisions and appeals</td></tr></table></td><td>Necessary for effectiveness</td><td>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</td></tr>
</table>

<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy no./ Para no.</th><th>Main Modification</th><th>Reason for modification</th><th>Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?</th></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td>with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.</td></tr>
<tr><td>MM157</td><td>144</td><td>Policy DM8 Racehorse Training Zone</td><td>Policy DM8 <u>Epsom Downs Racecourse and the Racehorse Training Industry</u> <s>Racehorse Training Zone</s>
<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td>Loss of land to non-equestrian uses in the defined <s>Racecourse</s> <u>Racehorse</u> Training Zone</td><td>No loss of land to non-racehorse training uses in the <s>Racecourse</s> <u>Racehorse</u> Training Zone</td><td>Planning decisions and appeals</td></tr></table></td><td>Title amended to reflect change.

Amended ‘Racecourse’ to ‘Racehorse’.

Necessary for effectiveness</td><td>No. The change introduces no further LSEs that may compromise European site integrity.</td></tr>
<tr><td>MM158</td><td>144</td><td>Policy DM9 Visitor Accommodation</td><td><table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td>Planning permissions or appeals granted for visitor accommodation (number of units and bedspaces)</td><td><u>No specific target. Monitoring only</u> <s>Assess trends</s></td><td>Planning decisions and appeals</td></tr></table></td><td>Necessary for effectiveness</td><td>No. The change introduces no further LSEs that may compromise European site integrity.</td></tr>
</table>

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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. Monitoring only</u> ~~Assess trends~~ | Planning decisions and appeals		
MM159	145	Policy S11 Design	Policy S11 Design <u>and Heritage</u> Indicators | Annual Target / Plan Period Target | Data source Planning permissions refused based on the policy | <u>No specific target. Monitoring Only</u> ~~Assess trends~~ | Planning decisions and appeals	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
MM160	145	Policy S12 Amenity Protection	Policy ~~S12~~ <u>DM24</u> Amenity Protection Indicators | Annual Target / Plan Period Target | Data source Planning permissions refused based on the policy | <u>No specific target. Monitoring Only</u> ~~Assess trends~~ | Planning decisions and appeals	Title change to reflect the policy Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
MM161	145	Policy DM10 Building Emissions Standards	Policy DM10 Building Emissions <u>and Energy</u> Standards Indicators | Annual Target / Plan Period Target | Data source Planning permissions <u>for residential use</u> ~~approved~~ supported | All <u>residential planning applications</u> ~~relevant planning~~ | Planning decisions and appeals	Title change & additional indicator 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?
			by an appropriate Energy Assessment ~~applications are~~ accompanied by an Energy Assessment demonstrating policy requirements can be met.		
			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		
MM162	146	Policy DM12 Health Impact Assessment	Indicators: Number of planning applications that include a health ~~Planning permissions inclusion of an~~ impact assessment~~, if required.~~ / Annual Target / Plan Period Target: All eligible applications to include a ~~permissions include a~~ health impact assessment~~, if required.~~ No specific target, monitoring only. / Data source: Planning decisions and appeals; ONS Health Data	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.

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<tr><th>Ref</th><th>Page(s)</th><th>Policy no./ Para no.</th><th>Main Modification</th><th>Reason for modification</th><th>Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?</th></tr>
<tr><td>MM163</td><td>146</td><td>Policy S13 Preserving identity of place with heritage</td><td>~~Policy S13 Preserving identity of place with heritage~~
<table><tr><td>~~Indicators~~</td><td>~~Annual Target / Plan Period Target~~</td><td>~~Data source~~</td></tr><tr><td>~~Net gain/loss of listed buildings~~</td><td>~~No loss of designated heritage assets~~</td><td>~~Planning decisions and appeals~~</td></tr><tr><td>~~Number of listed buildings at risk~~</td><td>~~No increase in number of Listed Buildings identified as at risk~~</td><td>~~Buildings at risk register~~</td></tr></table></td><td>Policy deleted, monitoring indicator no longer necessary</td><td>No. Policy deletion introduces no further LSEs that may compromise European site integrity.</td></tr>
<tr><td>MM164</td><td>146</td><td>Policy DM13 Development Impacting Heritage Assets</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>~~Net gain/loss of~~ listed buildings</td><td>No loss of designated heritage assets</td><td>Planning decisions and appeals</td></tr><tr><td>Number of <u>nationally</u> listed buildings at risk</td><td>No loss of designated heritage assets</td><td>Planning decisions and appeals</td></tr></table></td><td>Necessary for effectiveness</td><td>No. The change introduces no further LSEs that may compromise European site integrity.</td></tr>
<tr><td>MM165</td><td>146</td><td>Policy DM14 Shopfronts, new indicator</td><td><u>Policy DM14 Shopfronts</u>
<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Planning appeals where the council refused permission for shopfronts for</u></td><td><u>No appeal decisions allowed relating to shopfront design.</u></td><td><u>Planning decisions and appeals</u></td></tr></table></td><td>Necessary for effectiveness</td><td>No. The change introduces no further LSEs that may compromise European site integrity.</td></tr>
</table>

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	Indicators: 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 Annual Target / Plan Period Target: ~~Assess trends~~ <u>No specific target, monitoring only</u> Data source: Planning decisions and appeals	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
MM167		Policy DM16 Landscape Character (New indicator under DM15)	<u>Policy DM16 Landscape Character</u> Indicators: <u>Planning applications and appeals within Area of great landscape value</u> Annual Target / Plan Period Target: <u>No appeal decisions allowed for major development relating</u> Data source: <u>Planning decisions and appeals</u>	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.

<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy no./ Para no.</th><th>Main Modification</th><th>Reason for modification</th><th>Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?</th></tr>
<tr><td></td><td></td><td></td><td><table><tr><td></td><td><u>to the landscape character policy</u></td><td></td></tr></table></td><td></td><td></td></tr>
<tr><td>MM168</td><td>147</td><td>Policy S14 Biodiversity and Geodiversity</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Condition status of SSSIs</td><td><u>No Specific Target</u>
Improvements to condition of SSSIs in line with targets in Local Nature Recovery Strategy</td><td>Site surveys</td></tr><tr><td></td><td></td><td></td></tr><tr><td>Condition status of SNCI</td><td><u>No Specific Target</u>
Improvements in condition status</td><td>Surveys and DEFRA returns</td></tr></table></td><td>Necessary for effectiveness</td><td>No. The change introduces no further LSEs that may compromise European site integrity.</td></tr>
<tr><td>MM169</td><td>147</td><td>Policy ~~S15~~ <u>DM25</u>– Biodiversity Net Gain</td><td><table><tr><td>Indicators</td><td>Annual Target/Plan Period Target</td><td>Data source</td></tr><tr><td>Percentage of major planning applications delivering ~~at least 10%~~ biodiversity net gain</td><td>All qualifying development obligated to achieving at least 10% biodiversity net gain or 20% where</td><td>Planning decisions and appeals</td></tr></table></td><td></td><td>No. The change introduces no further LSEs that may compromise European site integrity.</td></tr>
</table>

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: New development proposals including landscape plans Annual Target / Plan Period Target: All ~~relevant~~ qualifying planning applications to include appropriate landscape plans Data source: Surveys and DEFRA returns	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
MM171	147	Policy S16 Flood Risk and Sustainable Drainage	Indicators: Number of planning permissions granted contrary to Environment Agency advice on flooding and water grounds Annual Target / Plan Period Target: No specific target. Number of planning applications permitted or appeals allowed contrary to advice of the Environment Agency Data source: Planning decisions and appeals	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
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

<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy no./ Para no.</th><th>Main Modification</th><th>Reason for modification</th><th>Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?</th></tr>
<tr><td></td><td></td><td>Contamination</td><td><table><tr><td>Number of planning decisions including appeals allowing development that is not in accordance with this policy</td><td><u>No specific target.</u> Number of relevant planning applications that are not in accordance with the policy</td><td>Planning decisions and appeals</td></tr></table></td><td></td><td>compromise European site integrity.</td></tr>
<tr><td>MM173</td><td>148</td><td>Policy S17 Infrastructure Delivery (additional indicator)</td><td><table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></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></td><td>Necessary for effectiveness</td><td>No. The change introduces no further LSEs that may compromise European site integrity.</td></tr>
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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?
					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 Street Improvements (LSI).	No specific target. Priority LCWIP and LSI projects progressed over the Local Plan period.	Infrastructure Delivery Plan Authority Monitoring Report		
			Primary care facility at Horton Farm (SA35) or an equivalent financial contribution towards off-site provision of new or improvement	Estimated delivery date 2032 to 2037.	Planning Applications Infrastructure Delivery Plan		

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<tr><th>Ref</th><th>Page(s)</th><th>Policy no./ Para no.</th><th>Main Modification</th><th>Reason for modification</th><th>Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>to existing health facilities</td><td></td><td>Authority Monitoring Report</td></tr>
<tr><td>GP practice extensions / redevelopment / reconfiguration as needed</td><td>No specific target. Improvements to be delivered over plan period dependent upon need.</td><td>Infrastructure Delivery Plan</td></tr>
<tr><td>New Sports Hub for the borough to include playing pitches (grass and artificial), a new pavilion and changing facilities. Provision at site allocation SA34</td><td>Estimated to be delivered between 2032 and 2037</td><td>Planning Applications

Infrastructure Delivery Plan

Authority Monitoring Report</td></tr>
</table>
</td><td></td><td></td></tr>
<tr><td>MM174</td><td>148</td><td>Policy S18 Green and Blue Infrastructure</td><td>
<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 that secure the provision of green infrastructure through new development</td><td>No specific targets. Monitoring only.~~Assess trends~~</td><td>Planning decisions and appeals</td></tr>
</table>
</td><td>Necessary for effectiveness</td><td>No. The change introduces no further LSEs that may compromise European site integrity.</td></tr>
</table>

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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 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 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	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
MM176	149	Policy DM20 Community and Cultural Facilities	Indicators / Annual Target / Plan Period Target / Data source 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)	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.

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<tr><td>MM177</td><td>149</td><td>~~Policy DM21 Education Infrastructure~~</td><td><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 additional education floorspace~~</td><td>~~Assess trends~~</td><td>~~Planning decisions and appeals~~</td></tr>
</table></td><td>Policy deleted, indicator no longer necessary</td><td>No. Policy deletion introduces no further LSEs that may compromise European site integrity.</td></tr>
<tr><td>MM178</td><td>149</td><td>Policy S19 Transport</td><td><table>
<tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr>
<tr><td>~~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.</td><td>~~100% of qualifying developments~~ All qualifying developments</td><td>Planning ~~applications, appeal monitoring~~,decisions and appeals

Authority Monitoring Report</td></tr>
<tr><td>~~Use of sustainable travel modes~~</td><td>~~Increase in travel to work~~</td><td>~~Census – every 10 years~~</td></tr>
</table></td><td>Necessary for effectiveness</td><td>No. The change introduces no further LSEs that may compromise European site integrity.</td></tr>
</table>

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 2031 Census over 2021 baseline.~~	~~SCC data on sustainable transport.~~		
				Number of car club vehicles and cycles available for public cycle rental schemes	No specific target. Monitoring only.	Planning decisions and appeals Authority Monitoring Report	
				Number of LCWIP priority schemes implemented	No specific target. Monitoring only.	Planning decisions and appeals Authority Monitoring Report	
				Number of car free developments implemented	No specific target. Monitoring only.	Planning decisions and appeals Authority Monitoring Report	
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.

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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 voluntary sector, public service providers, places of worship and cultural facilities including theatres and arts centres.~~ **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. **District Licencing Scheme:** 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. **Essential Local Workers**: 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. **Green and Blue Infrastructure (GI)**: 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~~	Additional entry in the Appendix to define District Licencing Scheme Essential local workers housing defined in the glossary which is captured under policy S5 Amended definition to be consistent with S18 New entry for effectiveness	

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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?
			~~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.~~ **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. **Parking Stress**: The measure of the saturation levels of parking in a defined area and expressed in percentage terms. **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. **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. **Racehorse Movement Corridors**: Routes travelled by racehorses to and from training yards to access the racehorse training grounds. **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.	New entry necessary in relation to policy S11 New entry for effectiveness and consistency. Define Racehorse training terms in policy DM8 New entry for effectiveness and consistency, Social Infrastructure and Community Facilities	

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?
			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. **Specialist Housing**: ~~H~~housing specifically designated to meet the identified needs of specialised groups, such as the elderly, disabled or student population ~~older people and people with support needs. It can include extra care housing~~.	defined consistent with DM20 Modified to ensure effectiveness by using appropriate definition	
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	The car parking standards identified in this appendix are maximums. In light of the above, there are likely to be situations where lower levels of parking ~~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).		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 industry ~~or equestrian~~</td><td>~~18~~ 24 months</td></tr></table>	Modifications for effectiveness and consistency with amended policy	No. The change does not introduce any new LSEs that may compromise European site integrity.

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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	**A6.2.1 Scheduled Ancient Monuments and Areas of High Archaeological Potential** 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. Scheduled Monument Consents are determined by Historic England and not local authorities. 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 is inconclusive, or 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.	Modification necessary for effectiveness	No. The change does not introduce any new LSEs that may compromise European site integrity.

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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	~~150~~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

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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

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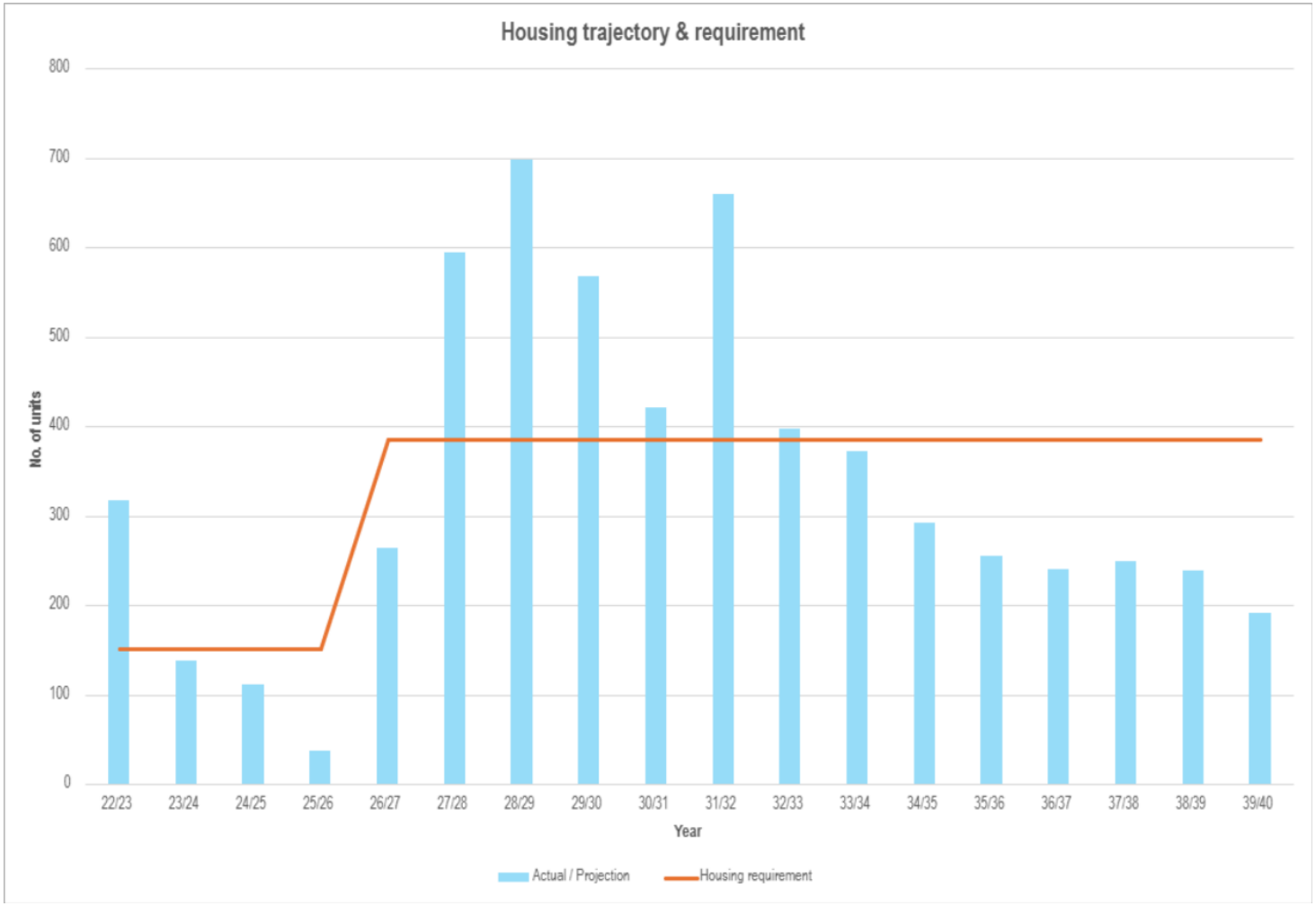
Appendix A2: Housing trajectory & requirement



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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

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Epsom & Ewell Local Plan 2022-2040

Examination in Public

Schedule of Proposed Post Hearings Additional Modifications

September 2026

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 ~~strikethrough~~ 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	~~**Details of the Regulation 19 Representation**~~ ~~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.~~ ~~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:~~ ~~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~~	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
			~~(including draft site allocations) and development management policies.~~ ~~1.4. The Regulation 19 consultation stage is different to those undertaken previously:~~ • ~~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
			~~○ Whether or not the plan is legally compliant (including Duty to Cooperate).~~ ~~○ Whether the plan satisfies the tests of soundness by being:~~ ~~▪ 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
			~~policy, paragraph or page number you are referring to.~~ ~~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.~~ ~~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~~	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			~~scanning the QR code:~~ 	
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** • 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
			• ~~Emerging~~ Surrey County Council Net Zero Toolkit (2024)	
AM5	71	Para 5.7	The Local Plan Viability Assessment 2023 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	**Policy DM1: Residential Space Standards** 1) Proposals for new residential dwellings (Use Class C3) will be permitted where: a) the internal space complies with or exceeds the nationally described space standards or any future equivalent. b) the minimum requirements for private outdoor space as set out below are satisfied: i) a 5 sq m balcony within flatted development accessible from the main habitable room ii) a dedicated private garden for houses. 2) All dwellings will be required to be built to appropriate accessible and adaptable standards to	So that the policy numbering is consistent with other policies.

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			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. 3) On sites of 10 or more dwellings: ~~i~~a) 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 ~~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.	
AM7	77	Policy DM2 key supporting documents	**Key supporting documents** • Housing and Economic Development Needs Assessment (HEDNA) • Epsom and Ewell Self-Build and Custom • Housebuilding Register ~~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** •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** • Retail and Commercial Leisure Needs Assessment (2020) • Retail and Commercial Leisure Needs Assessment Update (2021) • Housing and Economic Development Needs Assessment (2023~~2~~)	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 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** •~~Emerging~~ Surrey County Council Net Zero Carbon Toolkit (2024) •Epsom and Ewell Climate Change Study (2023) •Local Plan Viability Assessment (2024)	To reflect that the Net Zero toolkit has been published. Date added to documents for clarity and consistency
AM15	124	Policy DM18	**1~~A~~. Soil Waste/Contaminated Land** 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: ~~i~~a) A detailed technical assessment to assess the nature of the contamination has been undertaken (taking care to avoid the escape of contaminants); and ~~ii~~b) the land can be made safe for the proposed use for the entirety of its lifetime, before the development is occupied~~;~~. **2~~B~~. Water Quality** New development will be permitted where: ~~i~~a) It includes suitable arrangements for the disposal of foul water into a sewerage system at the nearest point of adequate capacity; and	So that policy numbering is consistent with other policies.

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			~~ii~~b) It does not deteriorate the local water environment; or ~~iii~~c) It includes well designed mitigation measures to ensure the local water environment does not deteriorate, both during construction and the lifetime of the development. **3~~C~~. Air Quality** All development proposals will be permitted where: ~~i~~a) Their emissions will be a low as practicable; or ~~ii~~b) appropriate mitigation measures are put in place to reduce impacts to acceptable levels; and ~~iii~~c) 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) **4~~D~~. Noise and Vibration** Development will be permitted where;	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			~~i~~a) The application for development can demonstrate it will not generate or (as the agent of change) expose itself to unacceptable noise or vibration; or ~~ii~~b) Where unacceptable noise and vibration is likely to occur, it incorporates attenuation measures to bring noise and vibration to acceptable levels. **5~~E~~. Light** 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. **6~~F~~. Odour** 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. New developments that will generate odour or fumes, must be carefully designed to include on-site mitigation	

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	**Policy S19: Transport** 1) To ensure the delivery of a sustainable transport network, new development in the borough will: a) need to be well designed to promote, safe accessibility and movement which prioritise the access needs of pedestrians and cyclists, protecting and enhancing pedestrian and cycle access routes; b) improve existing walking and cycling routes to local facilities, services, bus stops and railway stations;	So that the policy numbering is consistent with other policies. Typographical errors in Criteria 2b – delete duplicate text

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			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); d) meet the council's parking standards with consideration given to highway safety and congestion; e) consider establishing car clubs and cycle rental schemes or other similar sustainable transport schemes; f) provide facilities situated in convenient and easy to use locations that will increase the uptake of electric and other zero emission vehicles; and g) provide appropriate servicing to the site, including waste and recycling storage areas and accessible collection points for refuse vehicles. 2) Where any new development would generate a significant number of trips by users of the development (these would include but are not limited to development of educational establishments, large business premises	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			or residential developments of 50 homes or more) the council will require: a) planning applications to be accompanied by a Transport Assessment; and 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.~~ 3) Car free development will be encouraged in appropriate locations and where supported by evidence demonstrating that proposals would not lead to parking stress. **Key supporting documents** • 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)	

<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy number/paragraph number</th><th>Proposed Modification</th><th>Reason for Modification</th></tr>
<tr><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>AM18</td><td>164</td><td>Appendix 3: Development Plan Policies to be superseded by the Local Plan (2022-2024) Core Strategy Policies</td><td>
<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 Space<u>s</u>, <u>Outdoor</u> Sport and <u>Recreation</u> ~~Green Infrastructure~~ / S18 Green and Blue Infrastructure</td></tr>
<tr><td>CS5 – The Built Environment</td><td>S11<u>3</u>: ~~Preserving identity of place with~~ <u>Design and</u> heritage / DM13 Development Impacting Heritage Assets</td></tr>
<tr><td>CS6 - Sustainability in New Developments</td><td>DM10: Building Emission <u>and Energy</u> Standards /</td></tr>
</table>
</td><td>To include most up to date policy references and titles</td></tr>
</table>

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: Social Infrastructure and Community ~~and Cultural~~ Facilities	
			CS13 - Community, Cultural and Built Sports Facilities	DM19 Open Spaces, Outdoor Sport and Recreation / DM20: Social Infrastructure and Community ~~and Cultural~~ Facilities	
			CS14 – Epsom Town Centre	Policy S4: Epsom Town Centre	
			CS15 – Role of Local Centres	S10: Retail Hierarchy and Network	

<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy number/paragraph number</th><th>Proposed Modification</th><th>Reason for Modification</th></tr>
<tr><td></td><td></td><td></td><td><table><tr><td>CS16 - Managing Transport and Travel</td><td>S19: Transport</td></tr></table></td><td></td></tr>
<tr><td>AM19</td><td>165</td><td>Appendix 3: Development Plan Policies to be superseded by the Local Plan (2022-2024) Plan Epsom Policies</td><td><table><tr><td>Plan E ~~Policy~~ – An Area Action Plan for Epsom Town Centre Policies</td><td>Replacement Policy in Epsom and Ewell Local Plan (2022-2040)</td></tr><tr><td>Policy E1 - Town centre boundary</td><td>S10: Retail Hierarchy and Network</td></tr><tr><td>Policy E2 - Housing capacity in the Town Centre</td><td>S11: Design <u>and Heritage</u></td></tr><tr><td>Policy E3 - Town Centre retail capacity</td><td>S1: Spatial Strategy</td></tr><tr><td>Policy E4 - Town Centre Primary Shopping Area and Primary & Secondary Retail Frontages</td><td>DM4: Primary Shopping Areas and Retail Frontages</td></tr><tr><td>Policy E5 - Town Centre employment floorspace provision</td><td>S9: Economic Development</td></tr><tr><td>Policy E6 - Leisure, cultural and community facilities provision</td><td>DM20: <u>Social Infrastructure and</u> Community ~~and Cultural~~ Facilities</td></tr><tr><td>Policy E7 - Town Centre building height</td><td>S11: Design <u>and Heritage</u></td></tr></table></td><td>To include most up to date policy references and titles</td></tr>
</table>

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; SA41: Conservative Club, Epsom Club and Church; and SA45: Auction House, Depot Road	
			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	

<table>
<tr><th>Ref</th><th>Page(s)</th><th>Policy number/paragraph number</th><th colspan="2">Proposed Modification</th><th>Reason for Modification</th></tr>
<tr><td></td><td></td><td></td><td></td><td><u>SA42: TK Maxx and SA43 Land R/O The Albion Public House (Mccaffertys Bar)</u></td><td></td></tr>
<tr><td>AM20</td><td>166</td><td>Appendix 3: Development Plan Policies to be superseded by the Local Plan (2022-2024) Development Management Policies</td><td>Development Management Policies (2015)</td><td>Replacement Policy in Epsom and Ewell Local Plan (2022-2040)</td><td>To include most up to date policy references and titles</td></tr>
<tr><td></td><td></td><td></td><td>DM1: Extent of the Green Belt</td><td>DM15: Green Belt</td><td></td></tr>
<tr><td></td><td></td><td></td><td>DM2: Infilling within the Major Developed Site</td><td>DM15: Green Belt</td><td></td></tr>
<tr><td></td><td></td><td></td><td>DM3: Replacement and extensions of buildings in the Green Belt</td><td>DM15: Green Belt</td><td></td></tr>
<tr><td></td><td></td><td></td><td>DM4: Biodiversity and New development</td><td>S14: Biodiversity and Geodiversity / ~~S15~~;<u>DM25</u> Biodiversity Net Gain</td><td></td></tr>
<tr><td></td><td></td><td></td><td>DM5: Trees and Landscape</td><td>DM17: Trees, Woodlands and Hedgerows</td><td></td></tr>
<tr><td></td><td></td><td></td><td>DM6: Open Space Provision</td><td>DM19 Open Space<u>s</u>, <u>Outdoor</u> Sport and <u>Recreation</u></td><td></td></tr>
<tr><td></td><td></td><td></td><td>DM7: Footpath, Cycle and Bridleway Network</td><td>S19: Transport</td><td></td></tr>
</table>

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</u> Racehorse Training ~~Zone~~<u>Industry</u>	
			DM27: Working from Home	<u>N/A</u>	
			<u>DM28: Existing Retail Centres (Outside of Epsom Town Centre)</u>	Policy DM4: Primary Shopping Areas and Retail Frontages	
			<u>DM29: Major New Retail Developments</u>	DM7: Employment Land	

Ref	Page(s)	Policy number/paragraph number	Proposed Modification		Reason for Modification
			DM30: Existing Out of Centre Retail Facilities	DM7: Employment Land	
			DM31: Safeguarding Small-Scale Retail Provision	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: Social Infrastructure and Community ~~and Cultural~~ Facilities	
			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 r~~ 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	**A4.2.4 Other forms of development ~~parking~~** All other forms of development should adhere to the guidelines set out in Surrey County Council's Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development (November 2021) (as amended).	Typographical error
AM23	185	Appendix 6: Guidance for Proposals Impacting Heritage Assets. A6.2.2	**A6.2.2 Conservation Areas** 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: • 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
			• 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. Further information on the Councils conservation areas, including the Conservation Area appraisals can be accessed from the following link: • 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	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: • 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. Further information on the Nationally Listed buildings can be accessed on the Historic England searchable list which can be accessed from the following link: • 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	**A 6.2.5 Locally Listed Buildings** 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. Further information on the locally listed heritage assets in the borough can be accessed from the following link: https://www.epsom-ewell.gov.uk/residents/planning/historic-environment/locally-listed-heritage-assets.	To provide further detail on where additional information can be located.
AM26	186	Appendix 6: Guidance for Proposals Impacting Heritage Assets. A6.3	**A6.3 Preferred approach to development proposals impacting heritage assets** 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	To provide further detail on where additional information can be located.

Ref	Page(s)	Policy number/paragraph number	Proposed Modification	Reason for Modification
			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. Applicants should consult the Historic Environment Record held by Surrey County Council for applications impacting heritage assets.	

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Revised 5 Year land supply position: Proposed Main Modifications

(Housing requirement 6012 between 2022-2040:152 dpa between 2022-2026 and stepped to 386 from 2026-2040)

Steps	**Formula**	**Workings**
Requirement		
A		Annual requirement is 2022-2040. Housing Need: 152 dwellings per annum (2022-26), 386 dwellings per annum (2026-40), 6012 dwellings for the plan period.
B	A x 1.2	2023 HDT result means 20% uplift to requirement.
C	B x 5	Housing requirement for the next five years 1 April 2026- 31 March 2031 is **2316**
Housing Supply		
D		Completions 1 April 2022 to 31 March 2026 = **605**
E	(4xA)-D	Deficit 1 April 2022 to 31 March 2026 is (152x 4)- 605= 608-606=**3**
F		Local Plan delivery 2026-2031 is **2547**
G	(F/E+C) x 5	Five-Year Housing Land Supply is (2547/2316+3) x 5= 2547/**2319**x5= **5.49**
5 yr Housing land supply		**5.49 yrs supply**

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Equality Impact Assessment

September 2026

EPSOM & EWELL BOROUGH COUNCIL

Equality Impact Assessment Template

Simple Guide and tips

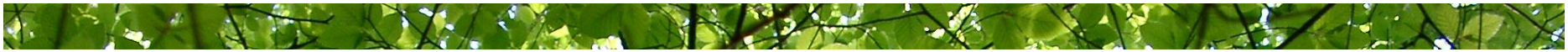
An Equality Impact Assessment (EIA) will help you analyse your policies and practices to make sure they do not discriminate or disadvantage people. However, EIAs also will help to improve or promote equality, access, participation in public life and good relations.

Your EIA should be started during the early stages of your project. Early consideration of equality matters will ensure that your policy, service or function will evolve in line with consideration of equality matters. However, not everything we do will have equality implications, only policies and practices that are relevant to equality need to be put in focus. If you decide after an initial assessment that a policy or practice is not relevant to equality then you should make a note of this. When completing a full EIA make certain the assessment is proportionate to the matters at hand. An EIA is not an end in itself – it is simply a way of ensuring and showing that due regard has been paid to our equality duty.

Where final decisions are made by councillors, in order to show that due regard has been given to the three aims of the equality duty at the time the decision is made, your assessment may need to be included within the report for Committee. The significance of your policy or practice to equality matters may help you make this decision.

All equality impact assessments are based around four core questions. There may well be others that contribute to the assessment, but the core ones remain throughout.

1. **What is the purpose of the policy?**
2. **How is it seeking to achieve this?**
3. **Who benefits and how? (and who, therefore, doesn't and why?)**
4. **What are any 'associated aims' attached to the policy?**



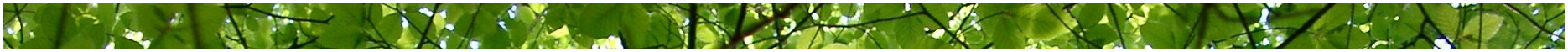
Sections 1 to 3 need to be completed in order to make an initial assessment

Section 4 onwards need to be completed for a full assessment

Stage 1 EIA Tracking[i]	
Title of EIA	**Proposed Main Modifications to the Submission Local Plan Equalities Impact Assessment**
Lead Officer	**Wai-Po Poon**
Division	**Planning**
Publication Date *(if applicable)*	**21 September 2026**

EIA Review Date *(only applicable when completing the full EIA)*	

Stage 2 Details of Policy, Service or Function[ii]	
Provide an overview of the policy, service or other function being introduced or reviewed. Please include the aim or purpose of the policy, service or function etc., any context, changes proposed and the desired outcome. You will need to start to think about the equality implications and whether there is potential for impact on residents, service users and staff (as applicable) with one or more of the protected characteristics.	**Background** The Borough Council is in the process of preparing a new Borough-wide Local Plan. The current Local Plan sets out local planning policy that directs development within the Borough. It currently comprises of the Borough Core Strategy (2007); Plan E Epsom Town Centre Area Action Plan (2011); and the Development Management Policies Document (2015). **Aim of the new Local Plan** The Epsom and Ewell Local Plan (2022-2040) will replace the existing Local Plan upon adoption. Plan making goes through a statutory process where there are several stages. The Proposed Main Modifications to the Submission Local Plan is the output of the Examination stage where an independent Inspector has been appointed to examine the soundness and legal compliance of the plan where hearings are held where potential modifications are discussed. This document presents the main modifications the Inspector considers necessary to make the Local Plan sound. The Proposed Main Modifications to the Submission Local Plan includes new and amended strategic policies, development management policies and site allocations. It seeks to assist in meeting development needs including housing need, economic development needs (retail and employment floorspace), and infrastructure needs to support future growth. The Local Plan will cover the period from 2022 until 2040. The Plan includes policies on housing provision to meet a range of needs. There are policies on housing standards, environmental standards and design standards for buildings and spaces. It includes policies that support future economic needs and infrastructure provision in line with the projected growth. Altogether these policies will ensure a sustainable level of future development having regard to the environmental and other physical constraints, that meet a range of needs of the existing and future population. The policies are based on numerous evidence base documents that have been commissioned to support policy formation. It is a statutory requirement to have an up to date Local Plan for the Borough. National policy requires that plans are reviewed at least once every 5 years. The new Local Plan includes new strategic policies, development management policies and site allocations to direct future development in the Borough. An Equality Impact Assessment was undertaken for the Submission version Local Plan published in December 2024. This assessment is for the Proposed Modifications to the Submission Local Plan.



Proposed changes from the Submission Local Plan Version

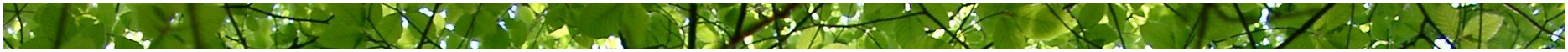
This assessment (Proposed Main Modification to the Submission Local Plan) supersedes the Submission version that was published in December 2024. The full list of proposed Main Modifications and reasons for the changes are set out in the Proposed Main Modifications Schedule. A summary of the core modifications is listed below:

- The Vision has been rewritten and reordered to be more concise. This is the high level vision for the Borough linked to the policies to deliver it. Nothing fundamental has changed for this assessment.
- Additional sites for allocation- 16 additional sites being allocated means additional housing on several new sites to meet the identified need. The fully assessed need for the Borough is still unmet, although the residual is reduced.
- Employment policy reworded and needs are quantified- although no fundamental changes
- Deletion of some proposed allocations which have been implemented and do not need to be allocated
- Affordable housing requirement on GB sites increased to reflect NPPF
- Removal of requirement for the delivery of Gypsy and traveller pitches on large windfall sites
- Epsom Downs Racecourse and the Racehorse Training Industry redrafted and area redrawn. The intentions of the policy broadly remain the same.
- Design policy substantially rewritten, although the intentions of the policy and specific density requirements broadly remain the same.
- Strategic Heritage policy deleted, now integrated into the Strategic Design policy
- Green Belt policy rewritten to avoid repetition of national policy and it now focusses on local detail.
- Amenity policy and BNG policy changed from strategic to Development Management policy
- Flood risk and sustainable drainage policy rewritten, although the intentions of the policy broadly remain the same
- Open Spaces, Outdoor Sport and Recreation & Social Infrastructure and Community Facilities revised to ensure clearer distinction between them
- Education policy removed as it is adequately addressed in the updated policy on Social Infrastructure and Community Facilities

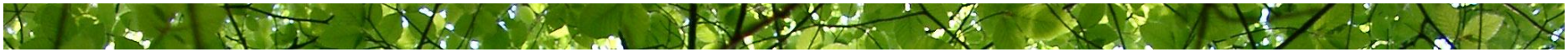
Potential Impact

The Local Plan comprises a range of topic areas and has the potential to have wide ranging impacts. The policies are evidence based to ensure they are robust and justified. The policies take into account the population and the demographic makeup of Epsom and Ewell, as well as future projections based on national statistics. A previous assessment was carried out in 2024 for the Proposed Submission Local Plan. This assessment is for the Proposed Main Modifications to the submission Local Plan.

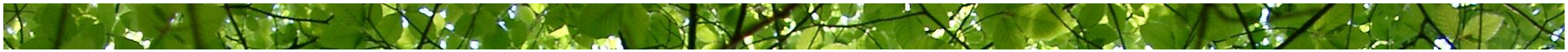
In addition, addendums to the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) has also been carried out to appraise the Main Modifications to the Submission Local Plan.



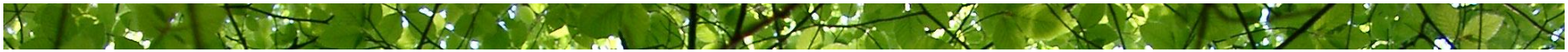
	The Proposed Main Modifications to the Submission Local Plan will be of interest to anyone who has an interest in the development of land in the Borough specifically developers and landowners. However, the impact of the proposed modification to the Local Plan may also be of interest to the general population living within or who would like to move to Epsom and Ewell in the future as it will guide decisions affecting their interests. The areas where there are potential equalities issues relate to policies on housing and infrastructure provision and accessibility. This may affect the protected characteristics age, disability and race. The Local Plan identifies there is a need for the provision of sites for gypsies, travellers and travelling showpeople however the full housing need cannot be met and will need to be met on unallocated land through the planning application process where a criteria based policy is included in the plan to assess these applications. The evidence base Housing Economic Development Needs Assessment HEDNA has identified an ageing population and the requirement for different housing types and tenure to meet various needs. This has led to the development of policies to deliver an appropriate range of housing and accommodation with care. The Local Plan seeks to improve the accessibility of new development and the suitability of new housing for people with disabilities and/or particular needs associated with old age. Officers have carefully considered the content of the Proposed Main Modifications to the Submission Local Plan from an equalities perspective and having regard to protected characteristics. Officers do not believe that any of these characteristics are unfavourably impacted by the Proposed Main Modifications to the Submission Local Plan where the intentions of policies have not fundamentally changed from the Submission Local Plan 2024.



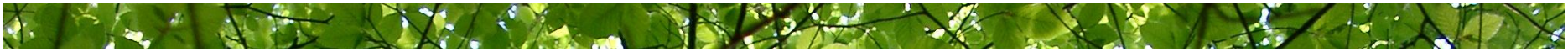
Stage 3 Relevance Check[iii]	
Indicate whether the policy, function or service change etc. outlined in Stage 2 above has the potential to impact on people with a protected characteristic (covers service users, the wider community and staff). If yes, a full EIA needs to be completed *(please go to Stage 4).* If no, please set out your reasoning and then secure sign-off by your Head of Service and the Inclusion and Diversity Group at Stage 8.	The fundamental objective of the Proposed Main Modifications to the Submission Local Plan is to ensure that the borough grows in a sustainable and inclusive manner – with opportunities for housing, employment, retail, travel, education, healthcare, health and well-being, open space and leisure. The Local Plan aim is to shape the future growth of the borough and will consequently, impact on its residents and future residents, and therefore has the potential to impact all who are defined as having protected characteristics. The initial assessment of the changes identified and the potential impact for people with a protected characteristic are detailed in the Stage 5 below.



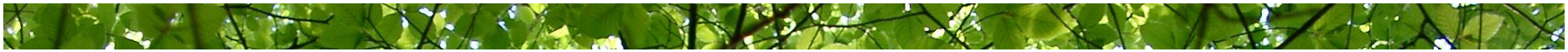
Stage 4 Data Relevant to Full EIA[iv]	
List all data (including source) and other information relevant to the full equality impact assessment	Key Data Sources: • Local Plan Evidence Base – as required by national planning policy. This includes a variety of statistical and qualitative evidence sources relating to housing need; gypsy and traveller accommodation needs; employment; retail, climate change and transport and other topic areas. The evidence base also considers the potential financial impacts of the emerging policies – specifically whether they could make new development unviable. The Local Plan Evidence Base can be found at the following link. In addition, further work was submitted during the Examination and can be found at the following link 'Post Hearing documents' , • National datasets – including data from the ONS and from national organisations such as the Homes England. Also, key evidence outputs from the OAHN standard method and the related Housing Delivery Test. • Sustainability Appraisal Report – a multi-stage appraisal of all the options considered during the development and preparation of the Draft Local Plan and updated throughout. This includes assessments on potential impacts on natural and built environment and accessibility. Elements of this appraisal process have fed directly into this assessment.
Specify all engagement activities undertaken	As a statutory planning policy document, the new Local Plan is subject to several statutory public consultation stages and non-statutory consultation throughout its development and preparation. The council has actively engaged with a wide variety of stakeholders and partners who have an interest in the new Local Plan. This has included engagement with internal partners (including Members); the development industry (through an on-going call-for-sites process); Duty to Co-operate partners (including neighbouring authorities and the Greater London Authority); infrastructure partners (including education providers); and local community groups. This process has supported the production of the evidence base that has informed the new Local Plan. In February and March 2023, the Council undertook public consultation in accordance with Regulation 18 of the Town & Country Planning Regulations on a full Draft Local Plan containing a spatial strategy, site allocations and a range of strategic and development management policies. Engagement included the use of a variety consultation media both physical and digital, including leaflets, FAQs and social media platforms. Officers also attended a number of face to face consultation events at various locations around the borough, engaging with the community directly. The Council made a proportionate effort to ensure that organisations representing the nine equality strands (as set out in stage 5 of this document) were given the opportunity to be involved. Comments made during this consultation fed into the development of the next version of the emerging Local Plan. Which is the subject of this next round of consultation. From December 2024 to February 2025, the Proposed Submission Local Plan was subject to statutory public consultation in accordance with Regulation 19 of the Town & Country Planning Regulations prior to the submission of the new Local Plan to the Secretary of State for examination, Those responding to the consultation were required to specifically state whether they found the new Local Plan sound or unsound – specifying the reasons why they considered the new Local Plan and its



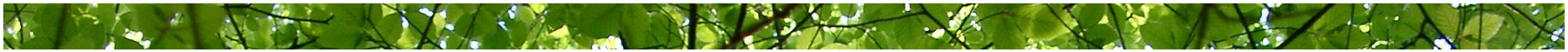
	constituent policies and site allocations unsound. Consultation responses submitted were collated and submitted to the Secretary of State for consideration through the subsequent examination process. Following the Regulation 19 consultation stage the draft new Local Plan was submitted for examination in public by an Inspector appointed by the Secretary of State. The Inspector considered this assessment and the potential equality impacts of the new Local Plan. During the examination process, there was further opportunity for people/ organisations to engage with the process during the public hearing. During the stage 2 examination hearings, concerns were raised that the Council was not doing enough to meet its housing needs through the submitted Local Plan. The Planning Inspector requested that the Council undertake two additional pieces of work: one in relation to sites assessed in Section 4 of the Green Belt Topic Paper and the other in relation to whether any sites identified in the Land Availability Assessment (LAA) could be considered developable. Following the submission of the two pieces of work, in February 2026, the planning inspector requested further work be undertaken to assess the suitability of the sites to enable the examination to proceed. The Council undertook this additional work and submitted it to the Inspector and published these as part of our Examination Library. The work comprised of the following documents: • Additional Sites for Potential Allocation (COUD_029) • Sustainability Appraisal (SA) Report Addendum (COUD_030) • Habitats Regulations Assessment (HRA) Addendum (COUD_031) • Infrastructure Delivery Plan (IDP) Addendum (COUD_032) • Transport Assessment Addendum (COUD_033a and COUD_033b) The planning inspector requested the Council undertake a non-statutory public consultation (held between May-June 2026) on the additional documentation to provide further opportunity for people to provide their representations. These representations were submitted to the planning inspector for her consideration. Following this, a further examination hearing was organised on the 2nd July 2026, which provided further opportunity for the public and organisations to engage with the process. There will also be opportunities for people to engage by way of the proposed main modifications statutory consultation process. Addendums to the Sustainability Appraisal and Habitats Regulation Assessment produced to support statutory and non-statutory consultation stages are subject to consultation. The Statement of Community Involvement 2022 sets out how the public consultation will be undertaken and the potential communication methods that will be used.



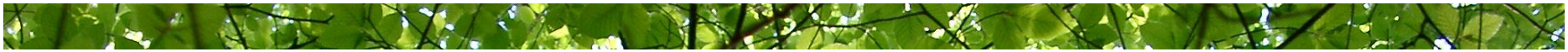
Stage 5 Impact on Residents, Service Users and Staff with Protected Characteristics[v]			
Undertake a full analysis which details all positive and negative impact arising from the policy, service or other function. If there will be no impact, make this clear by completing the relevant box. Please ensure that you evidence your conclusions with reference to the appropriate source.			
Protected Characteristic	**Potential Positive Impact**	**Potential Negative Impact**	**No Impact**
Age	The Proposed Main Modifications to the Submission Local Plan will deliver additional housing over the Submission Local Plan. It has the potential to benefit a number of different age groups through advancing equality of opportunity. Planned development will generate funds through the Community Infrastructure Levy, which will help to support investment in health, education and community infrastructure where required. The Proposed Main Modifications to the Submission Local Plan contains policies that support the growth and extension of community establishments including educational facilities, health centres and community halls which cater to a wide age range. The evidence base for the Local Plan includes evidence about needs for specialist housing, which has informed a policy framework to guide the development of a variety of housing and accommodation with care, to meet the needs of an ageing population. Other policies include introduction of optional building regulations to improve the accessibility, adaptability and suitability of new dwellings for wheelchair users, which is likely to be of benefit to people who develop mobility problems due to old age. New policies that seek to respond to the housing need identified for the Borough could benefit a wide range of age groups. For example, by providing affordable		



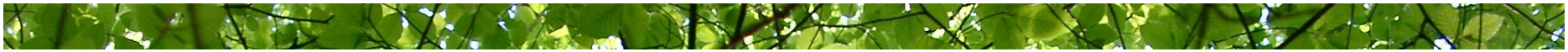
	accommodation for young people or delivery of appropriate housing for elderly people, including close care accommodation. This may lead to the release of family sized housing onto the market to meet demand from that demographic. By seeking to secure investment in infrastructure, the Proposed Main Modifications to the Submission Local Plan will ensure that future growth is inclusive to all age groups. Whether that be in terms of providing opportunities in employment; education; healthcare; travel; and open space provision (among many possible examples).		
Disability	The evidence base for the Local Plan includes evidence about needs for specialist housing which has informed policy for the introduction of optional building regulations to improve the accessibility, adaptability and suitability of new dwellings for wheelchair users, which is likely to be of benefit to people with mobility issues. Other complimentary planning policies, including those relating to meeting specific housing needs, meeting residential space standards and the delivery of inclusive good quality design (specifically for housing but equally for other forms of growth and infrastructure provision) will ensure that future growth is accessible to all.		
Gender Reassignment			The Proposed Main Modifications to the Submission Local Plan is neutral with respect to equality issues relating to gender reassignment.



Pregnancy and Maternity			The Proposed Main Modifications to the Submission Local Plan is neutral with respect to equality issues relating to pregnancy and maternity.
Race			The Proposed Main Modifications to the Submission Local Plan makes provision for gypsy and traveller accommodation, although, the full needs will not be met in full through the sites allocation process and some of this need can be met through the planning application process. Whilst the Plan will make provision for a mix of housing and other development needs that will reflect a range of need, it is the case that the overall housing need in the borough, including conventional and specialist accommodation cannot be met in full in the draft Local Plan site allocations. This affects all groups in the Borough rather than having a particular impact on one group.
Religion and Belief	The Proposed Main Modifications to the Submission Local Plan supports development and extension for community uses including places of worship in sustainable locations such as the retail centres.		
Sex			The Proposed Main Modifications to the Submission Local Plan is neutral with respect to equality issues relating to sex.



Sexual Orientation			The Proposed Main Modifications to the Submission Local Plan is neutral with respect to equality issues relating to sexual orientation
Marriage and Civil Partnerships			The Proposed Main Modifications to the Submission Local Plan is neutral with respect to equality issues relating to marriage and civil partnership.

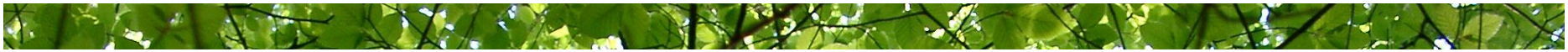


Stage 6 Decision[vi]	
Specify the full details of your decision. Include any changes made to the proposal, steps taken to eliminate or minimise any negative impact(s), any additional mechanisms put in place to meet the needs of particular groups or to help foster good relations etc.	The Proposed Main Modifications to the Submission Local Plan proposes changes to the Submission version Local Plan published in December 2024. The Submission version of the Local Plan was accompanied by an Equality Impact Assessment at that time. The Proposed Main Modifications to the Submission Local Plan identifies a proposed strategy, planning policies and new site allocations to meet the needs of a range of people in terms of housing, jobs, education providers, and retail. The intentions of policies have not fundamentally changed from the Submission Local Plan 2024 and overall the analysis in stage 5 demonstrates a positive policy response in equality terms. The only potential negative impact identified is that it does not meet the overall housing needs of the borough through sufficient site allocations (although it increases supply, thereby reducing the residual need, including not meeting the full accommodation needs of the gypsy and traveller community, however this is the same case reflected for the overall housing needs and therefore is not considered negative impact or targeted to a specific group. Overall, the benefits are associated with equality of opportunity through increasing the provision and the types of housing and accommodation to meet the range of needs reflective of the population; ensuring a range commercial development continues to grow to maintain a prosperous local economy and that continued investment leads to additional social infrastructure health, education and community infrastructure to meet the range of needs of the borough's residents. On that basis it is not considered necessary to take any further actions.

Stage 7 EIA – Action Plan[vii]

Please specify any action that will be taken to support implementation of your decision

Issue Identified	Action required	Implementation Date	Responsible Officer
None	None required	N/A	N/A



Stage 8 EIA Sign Off[viii]	
Head of Service: Ian Mawer	**Date:** 21 September 2026
Inclusion & Diversity Group:	**Date:** Circulated to group between 7 September - 18th September 2026

i **Stage 1 - EIA Tracking**
Insert appropriate details. A review date will only be required when completing the full equality impact assessment (Stages 1 – 8).

ii **Stage 2 - Details of Service / Policy / Function to be assessed**
In this section you will need to provide information which explains the subject matter of the work you are undertaking. If a new policy is being developed then explain what the policy covers and what it sets out to achieve. If a policy is being reviewed, then once again explain what the policy addresses and highlight any changes that are being introduced. If the work you are undertaking involves a service change, outline what the current service provides and to whom, then discuss the changes that are proposed and what the outcome of these service changes are anticipated to be. Bear in mind when drafting this section (and the rest of the document) that a lay person, unfamiliar with the subject matter should be able to read it and understand the policy, function or service and any changes that are proposed.

iii **Stage 3 – Relevance Check**
The relevance check asks you to complete an initial assessment of whether the new / reviewed policy, service or function proposed is anticipated to impact upon residents, service users or staff with a protected characteristic. If you consider that there will be some form of impact then you must go on to complete all other stages of the form (Stages 4 – 8 inclusive). If, however, there will be no impact, provide your justification in the space provided and seek formal sign off of your assessment (Stage 8). The form should then be kept in case you need to provide evidence at a later date that you had due regard to the three aims of the equality duty during policy development / service design. If you have any uncertainty at this stage of the process, go on to complete all sections of the Equality Impact Assessment Template (Stages 1-8).

iv **Stage 4 - Data Relevant to Full EIA**
In order to undertake a full assessment of the equality implications associated with your project/work you will need to outline the data that you possess which will help you to understand any resultant impact. If you identify any gaps in your information, and thereby have gaps in your understanding, you will need to fill these areas of uncertainty by exploring what other sources of information there are and/or by talking to different

groups/bodies. It may be possible to consult with relevant groups. If you undertake any engagement activities you will need to set them out in this section. Please speak to the Consultation Team in Policy, Performance and Governance if you are considering undertaking consultation.

v

Stage 5 - Impact on Residents, Service Users and Staff with Protected Characteristics

Using the information that you have set out at stage 4 you now need to consider carefully whether the new or revised policy, service or other function etc. will impact upon people with a protected characteristic in a positive or negative way. You will need to consider service users, residents and staff (as appropriate). Set out your considerations for each protected characteristic in the appropriate column. If no impact will arise, please indicate this in the appropriate box to show that you have given due regard to equality. When undertaking this assessment make sure you bear in mind the different forms of discrimination, e.g. direct and indirect discrimination, discrimination by association or perception. The protected characteristic 'marriage and civil partnership' needs only to be considered in relation to the first aim of the equality duty – the need to eliminate unlawful discrimination, harassment and victimisation...

vi

Stage 6 – Decision

This section requires you to make and evidence your decision. Use your analysis undertaken in Stage 5 together with other relevant factors such as financial implications. The importance that you give equality considerations when making your decision should be proportionate to the significance of the policy, service or function on advancing equality of opportunity and in fostering good relations. Be mindful that your decision could be challenged, the Equality Act 2010 requires you to 'give due regard' to the three aims of the public sector equality duty. A strong evidence base and transparency will lead to effective decision making.

vii

Stage 7 – Action Plan

In the Action Plan set out any actions that you plan to implement to support your policy, service delivery or change etc. You will need to set a completion date and name a responsible officer. These actions may comprise some form of positive step(s) to support the needs of a particular group or step(s) which will negate any impact on a particular group.

viii

Stage 8 – EIA Sign Off

This section must be completed by the relevant Head of Service and a copy sent to HRAdmin@epsom-ewell.gov.uk when finishing your assessment at Stage 3 – Relevance Check or when completing the full equality impact assessment, Stages 1-8.

Further information is available from:

'Equality Impact Assessment Introduction and Appendices'. .

'Meeting the Equality Duty in Policy and Decision-Making England'

If you need further assistance please speak to a member of the Inclusion and Diversity Group