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Legal and Democratic Services



LICENSING AND PLANNING POLICY COMMITTEE

Thursday 25 January 2018 at 7.30 pm

Council Chamber - Epsom Town Hall

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

Councillor Graham Dudley (Chairman)	Councillor Rob Geleit
Councillor David Wood (Vice-Chairman)	Councillor Tina Mountain
Councillor Michael Arthur	Councillor Martin Olney
Councillor Steve Bridger	Councillor David Reeve
Councillor Chris Frost	Councillor Alan Sursham

Yours sincerely

A handwritten signature in black ink that reads 'K. Beldan'.

Chief Executive

For further information, please contact Sandra Dessent, tel: 01372 732121 or email: sdessent@epsom-ewell.gov.uk

AGENDA

1. QUESTION TIME

To take any questions from members of the the Public

Please note: Members of the Public are requested to inform the Democratic Services Officer before the meeting begins if they wish to ask a verbal question to the Committee.

2. DECLARATIONS OF INTEREST

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

3. MINUTES OF PREVIOUS MEETING (Pages 3 - 6)

The Committee is asked to confirm as a true record the Minutes of the Meeting of the Committee held on 7 December 2017 (attached) and to authorise the Chairman to sign them.

4. HACKNEY CARRIAGE AND PRIVATE HIRE LICENSING POLICIES (Pages 7 - 30)

The Committee are asked to agree to recommend to Council the adoption of the revised Hackney Carriage and Private Hire Policy incorporating the new Surrey-wide convictions policy.

5. LOCAL PLAN ISSUES & OPTIONS CONSULTATION - OUTCOMES (Pages 31 - 250)

This report provides an overview of the responses received during the Local Plan Issues and Options consultation. It also sets out the Officers' responding comments and any suggested actions and also proposes a way forward.

Members of the Committee are asked to consider the responses made to the Issues & Options Consultation as set out under Annexes 1 and 2 and subject to any amendments agree to the annexes being published as a record of the Consultation, and agree Option 4 as the way forward for the Local Plan.

**Minutes of the Meeting of the LICENSING AND PLANNING POLICY COMMITTEE
held on 7 December 2017**

PRESENT -

Councillor Graham Dudley (Chairman); Councillor David Wood (Vice-Chairman); Councillors Michael Arthur, Steve Bridger, Rob Geleit, Tina Mountain, Martin Olney, David Reeve, Alan Sursham and Tella Wormington (as nominated substitute for Councillor Chris Frost)

Absent: Councillor Chris Frost

Officers present: Karol Jakubczyk (Planning Policy Manager), Rachael Thorold (Senior Planning Policy Officer) and Sandra Dessent (Democratic Services Officer)

21 QUESTION TIME

No questions had been submitted or were asked by members of the public.

22 DECLARATIONS OF INTEREST

No declarations of interest were made by councillors regarding items on the Agenda.

23 MINUTES OF PREVIOUS MEETING

The Minutes of the Meeting of the Licensing and Planning Policy Committee held on 26 October 2017 were agreed as a true record and signed by the Chairman.

24 EPSOM & EWELL COMMUNITY INFRASTRUCTURE LEVY REGULATION 62 STATEMENT

The Committee received the Community Infrastructure Levy Regulation 62 Report, an annual report required under Regulation 62 of the Community Infrastructure Regulations 2010 (as amended). It set out how much CIL has been spent or allocated and how much remains available.

It was noted that two properties namely 137 Riverview Road and 93 Ruxley Lane were not showing receipts because recovery proceedings had commenced, and it was agreed that the CIL report would reflect this.

It was further noted that CIL monies had been received for the NESOT care home and whilst the project was terminated by the developer, the development of the site had commenced and was therefore CIL liable.

There were two entries for the Roveries, Cox Lane, and the Committee were advised that they were for separate applications only one of which would be CIL liable and would subsequently result in an adjustment to the total figure. It was therefore agreed in order to avoid ambiguity the total figure would be removed.

Officers agreed to investigate the status of Epsom Marble, 49 High Street, Ewell and report back to Members.

The Committee were advised that all CIL monies collected were combined in one fund and the Council were responsible for deciding how the monies would be allocated, applying the framework below:

- 80% - 'top up' funding for large infrastructure items such as transport networks, schools and open spaces
- 15% - local community schemes for which bids were received
- 5% - administration (staffing) costs

Accordingly, the Committee noted the content of the latest Regulation 62 report for the year April 2016 until March 2017 to be published on the Council's website before 31 December 2017.

25 INTRODUCING THE BROWNFIELD LAND REGISTER

The Committee considered a report regarding the introduction of a Brownfield Land Register that identified available, deliverable and developable sites for new housing that existed on previously developed land. The Council were required to publish this document by 31 December 2017.

The intended purpose of the register was to promote the redevelopment of previously developed sites that would be suitable for residential development, and was divided into two parts:

- Part 1 – All brownfield sites considered by the local authority to be appropriate for residential development.
- Part 2 – Sites that the local authority deemed suitable to be granted 'permission' in principle for residential development.

The Committee were advised that the inclusion of sites within Part 2 of the register was not mandatory, and the Council's adopted Core Strategy already directed development towards previously developed land in the built up area (which included brownfield sites), suggesting that any sites included in Part 1 of the register, were in principle suitable for residential development.

It was agreed that a copy of the register would be circulated to Committee members as soon as it was ready for publication.

Having considered the principle of the Brownfield Register, the Committee:-

- (1) Agreed to the publication of a Part 1 Brownfield Land Register, and authorised the Head of Place Development to finalise the content of the Register in accordance with the Regulations.
- (2) Agreed that no sites should be included in Part 2 of the Register due to the reasons set out above.

26 LOCAL PLAN AFFORDABLE HOUSING POLICY - STATEMENT ON THE EXEMPTION OF SMALL SITES FROM DEVELOPMENT CONTRIBUTIONS

Following a Written Ministerial Statement (WMS) on the question of local planning authorities seeking developer contributions for affordable housing from developments of ten or fewer dwellings, the Committee were asked to consider the Council's response, setting out the justification and evidence for its continued application of its own adopted policy.

The Committee discussed the likelihood of the policy being accepted by planning appeal Inspectors and it was acknowledged that based on past experiences (in this and neighbouring boroughs) it would be difficult to predict how successful this policy would be. However the Council believed that this more focused and concise statement could tip the balance in the Council's favour. It was also noted that the Council had struggled to meet its affordable housing target and small windfall sites made an important contribution to the delivery of affordable homes.

Having considered the proposed policy it was agreed that paragraph 3.8, first line would be amended to read:

'Therefore, the smaller sites, yielding between 5-10 dwellings make up a sizable proportion of the current supply...'

It was confirmed that the policy would take immediate effect, and accordingly the Committee:

- (3) Considered the situation relating to this matter in the wake of the publication of the written Ministerial Statement and recent planning appeal Inspector decision letters; and
- (4) Subject to a minor amendment set out above, it was agreed to adopt the Statement on the Exemption of small sites from Development Contribution (Affordable Housing), as the Council's position on the written Ministerial Statement for deployment in negotiations on developments on small sites and in any associated planning appeals.

27 PLANNING IMPROVEMENT ACTION PLAN 2017

Following a Planning Improvement Peer Challenge in September 2017, the Committee were asked to consider the management response to the findings set out in the review associated with Planning Policy recommendations.

The eight items set out under section 4 of key themes were discussed and it was noted that the second item the submission of an interim policy on Affordable Housing on ten units or less had been completed and setting up of Members Briefing evenings in order to develop a stronger corporate narrative around the need for growth was well underway, and to encourage attendance, it was requested that as much notice as possible be given to Members.

Accordingly, the Committee:-

- (5) Agreed those actions listed under Section 4 of the Epsom & Ewell Planning Improvement Action Plan 2017.
- (6) Noted and endorsed the establishment of a Working Group by the Planning Committee to oversee the implementation of the Plan comprising the Chair of Planning Committee, Chair of Licensing and Planning Committee, Chair of Audit, Crime and Disorder and Scrutiny Committee, the Chief Executive, the Head of Place Development and one additional Member who is not on either of the planning-related committees.

Note: Councillors Rob Geleit and Tina Mountain requested that their objection to recommendation 2, be recorded.

The meeting began at 7.30 pm and ended at 9.30 pm

COUNCILLOR GRAHAM DUDLEY (CHAIRMAN)

HACKNEY CARRIAGE AND PRIVATE HIRE LICENSING POLICIES

<u>Report of the:</u>	Head of Housing & Community
<u>Contact:</u>	Rachel Jackson
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	N/A
<u>Annexes/Appendices</u> (attached):	Annexe 1: Convictions policy Annexe 2: Revised Hackney Carriage and Private Hire Policy
<u>Other available papers</u> (not attached):	Report to the Licensing and Planning Policy Committee dated 14 th September 2017 Responses to consultation on the convictions policy

REPORT SUMMARY

The Committee are asked to agree to recommend to Council the adoption of the revised Hackney Carriage and Private Hire Policy incorporating the new Surrey-wide convictions policy.

RECOMMENDATION (S)

- 1. That the Committee agree to recommend to Council the adoption of the revised Hackney Carriage and Private Hire Policy incorporating the new Surrey-wide convictions policy.**
- 2. Authorise the Licensing, Grants & HIA Manager in consultation with the Chair of Licensing Policy and Planning Committee to make such minor amendments to the Hackney Carriage and Private Hire Policy (including convictions policy) as may be required from time to time under the Delegated Powers scheme.**

Notes

1 Implications for the Council's Key Priorities, Service Plans and Sustainable Community Strategy

1.1 None for the purposes of this report.

2 Background

2.1 In September 2017 this Committee were informed of project work being undertaken in Surrey regarding licensing and safeguarding. The Committee agreed in principal to the adoption of a Surrey-wide convictions policy for Hackney Carriage and Private Hire Drivers, and a further report be brought to this Committee following the public consultation. Consultation on the convictions policy commenced on 21 October 2017 and ended on 4 December 2017.

2.2 The convictions policy is attached as Annexe 1, and responses to the consultation have been previously circulated to the Committee, but in general are supportive of the proposal..

2.3 Members were also advised of other proposals within the project, one of the proposals is to introduce mandatory child sexual exploitation (CSE) awareness training for all drivers. Members are asked to approve this requirement in line with the Surrey project.

2.4 As the introduction of a mandatory training scheme would require amendments to the existing Council policy, Officers have taken the opportunity to suggest some minor revisions to the policy for consideration by the Committee. Consultation on the revised policy commenced on 31 October 2017 and ended on 4 December 2017.

2.5 The revised policy is attached Annexe 2, and despite a wide consultation with the trade, not one response was received, therefore it can be taken that there are no objections to the revised Policy.

2.6 The main amendments to the policy are:

- (i) Reference to the new convictions policy.
- (ii) Inclusion of the requirement for drivers to undertake the CSE awareness course.
- (iii) To extend the period an applicant needs to have held a UK/EU driving licence before they may apply for a Private Hire Driver Licence from 2 to 3 years.
- (iv) To extend the period for an applicant for a Hackney Carriage Driver Licence to have held a Private Hire Driver Licence from 3 to 6 years.
- (v) Inclusion of an "intended use" policy.

3 Proposals

- 3.1 That the Committee agree to recommend to Council the adoption of a revised Hackney Carriage and Private Hire Policy incorporating the convictions policy.

4 Financial and Manpower Implications

- 4.1 The implementation and enforcement of the policies will be progressed using existing officer resources.
- 4.2 **Chief Finance Officer's comments:** All financial implications and budget requirements are addressed within the Council's Medium Term Financial Strategy and Efficiency Plan

5 Legal Implications (including implications for matters relating to equality)

- 5.1 The Local Government (Miscellaneous Provisions) Act 1976 requires the Council to be satisfied that a person is a fit and proper person to hold a Hackney Carriage or Private Hire driver's licence. The adoption of a countywide convictions policy and revised policy would ensure a consistent and robust approach is taken across all Surrey licensing Authorities.

6 Sustainability Policy and Community Safety Implications

- 6.1 None for the purposes of this report.

7 Partnerships

- 7.1 A Surrey-wide Local Authority partnership is critical to ensuring effective licensing and safeguarding practices are adopted across the county.

8 Risk Assessment

- 8.1 There are no significant risks arising from this report.

9 Conclusion and Recommendations

- 9.1 That the Committee agree to recommend to Council the adoption of a revised Hackney Carriage and Private Hire Policy incorporating the convictions policy.

WARD(S) AFFECTED: (All Wards);

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Epsom & Ewell Borough Council

Hackney Carriage and Private Hire Licensing Policy

1. Application for Private Hire and Hackney Carriage Drivers licences

AGENDA ITEM 4
ANNEXE 1

a. Age/driving experience

An applicant must be at least 21 years of age, and have held a full UK/EU Driving Licence for at least 3 years prior to application.

In the case of applicants for a Hackney Carriage Driver Licence, the applicant must have held a Private Hire Driver Licence issued by Epsom & Ewell Borough Council for at least 6 years before being eligible to apply. In addition, before a Hackney Carriage Driver Licence will be issued for a new applicant, the applicant must have undertaken a Disability Awareness Course which must include practical manual handling of wheelchairs (documentary evidence must be provided).

b. Knowledge Test

Applicants for the grant of a Driver's licence will be required to undergo a Knowledge Test (which Licensing Officers will facilitate) to show an understanding of the local and surrounding area. An exception to this will be for drivers who will be working exclusively on home to school run services under a contract with Surrey County Council or who are employed by Surrey Choices Limited.

c. Suitability of an applicant/licence holder

All drivers (existing and new applicants) must be "fit and proper" to hold a licence. Applicants for the grant and renewal of a licence are subject to an enhanced DBS check, and must sign up to the online DBS update service.

There is an exemption for drivers who undertake Home to School runs who will not be required to undertake a DBS from the Authority as they have already been checked through Surrey County Council. Drivers licensed by Transport for London (TfL) are also not required to undertake a DBS check as they are already checked through the TfL.

d. Safeguarding

All drivers are required to undertake a child sexual exploitation (CSE) awareness course approved by the Authority. Existing drivers will have a maximum of 12 months to undertake the on-line training course from April 2018, for existing drivers undertaking the course during this period will be free of charge. Drivers who have failed to undertake the course by 31 March 2019 will have their Private Hire/Hackney Carriage Driver licence suspended until they have undertaken the course.

An applicant for the grant of a new Driver Licence from the effective date of this policy, will be required to have undertaken the course prior to a licence being granted.

Documentary evidence of completion of the course must be provided to the Authority, failure to do so within the period above will result in the suspension of the Private Hire/Hackney Carriage Driver Licence until such time evidence is provided.

In addition, all drivers are subject to the convictions policy attached as an annexe to the Policy.

e. Address History

Where an applicant for the grant of a licence, is not able to provide a full five year traceable history in the United Kingdom, then it will be necessary for the applicant to provide the equivalent of a DBS check from their appropriate Embassy or High Commission.

f. Right to remain and work in the United Kingdom

Applicants for the grant or renewal of a Private Hire/Hackney Carriage licence will be required to produce documentary evidence of a right to remain and work in the UK, this can be in the form of a British Passport, European Passport, British birth certificate or valid entitlement issued by the Home Office/UK Border/Immigration Service.

g. Medical Examination

Applicants will be required to provide a medical examination certificate which should be completed by their own doctor, in exceptional cases where approved by the Licensing, Grants & HIA Manager approval may be given for an applicant to use another doctor. A medical examination certificate will be valid for up to five years (unless the doctor recommends a more regular medical) for applicants up to the age of 65 years old. Drivers aged between 65 and 70 will be required to provide a medical certificate every two years and drivers over the age of 70 will be required to produce a medical certificate annually.

h. Appearance

Drivers are required to be smart and presentable at all times whilst working under the terms of the licence issued by the Authority. Footwear appropriate for driving must be worn at all times.

i. Intended use

It is expected that when a Private Hire Driver licence is issued, the intention of the driver is to undertake journeys that either commence or end within the Borough of Epsom & Ewell. Where it is proven that a licensed driver is regularly undertaking journeys solely outside the Borough then they may be issued with points under the approved Penalty Points scheme.

2. Application for Private Hire Vehicle Licences

a. Age/standard of vehicles

New vehicles

All vehicles which are being presented for first licensing by the Authority may be no older than six years old as of the date of application. An exception may be made for older vehicles if considered by an Authorised Officer to be in an excellent condition ie. bodywork which is free from scratches, dents and rust, a cosmetically clean interior and good service history records.

Existing licensed vehicles

Vehicles over four years of age at application/renewal will be required to undergo an inspection (and MOT test) every six months. An exception may be made for vehicles which have a main dealer service plan, or a specific servicing plan which requires the vehicle to be serviced at periods of no less than every three months.

b. Stretched limousines

Any stretched limousines that have been imported are required to have an IVA (Individual Vehicle Approval) test. This will need to be presented to the Licensing Authority to confirm it is built to certain safety standards. Applicants will also need to provide evidence that the vehicle has been tested by Driver and Vehicle Standards Agency. Vehicles with nine or more passenger seats may not be licensed as a Private Hire vehicle.

c. Imported vehicles

Any imported vehicles up to 10 years old at the time of first registration in the United Kingdom will be required to meet the standards specified in paragraph 2a, and also meet the technical standards of either;

- Europe Whole Vehicle Type approval
- British National Type approval
- Individual Vehicle approval

The Authority will require a registration certificate stating the approval status of the vehicle and that it meets the above requirements.

d. Tinted windows

Any vehicles which are brought in to be licensed must meet a minimum of 70% light transmission for front glass and to both sides of the driver.

e. Advertising on vehicles

Private hire vehicles may display either on the front or rear side doors of the vehicle a sign advertising the name and telephone number of the Private Hire Operator not more than 50mm high, the sign shall not include the words taxi or cab and shall not be illuminated. If the vehicle is licensed to carry more than six passengers the letters or figures shall not be more than 75mm high. In exceptional circumstances amendments may be permitted by the Authority.

f. MOTs

An MOT Test Certificate which is no more than eight weeks old from the date of application must be presented on application, annual and interim inspections, an exception is made for vehicles which have covered less than 2000 miles. Where an MOT Test Certificate has been issued with advisory notes, the defects must be rectified prior to the next inspection date or at an earlier date determined by the Authorised Officer.

g. Insurance

An Insurance certificate or cover note covering the driver for private hire use must be provided on application, annual and interim inspections.

h. Dual licensing

A private hire vehicle may only be licensed by one Authority at any one time. If a vehicle is found to be licensed by another authority then the vehicle licence issued by Epsom & Ewell Borough Council becomes immediately invalid,

3. Application for Hackney Carriage Vehicle Licences

a. Age/standard of vehicles

All vehicles which are being presented for first licensing by the Authority should be Euro 5 compliant. An exception is made for vehicle proprietors who have held a Hackney Carriage Vehicle Licence issued by the Authority prior to January 2013, who are entitled to renew/transfer their vehicle to a Euro 4 standard vehicle.

Where a vehicle has a front passenger seat in a purpose built hackney carriage vehicle this seat may be used for the carriage of passengers but only after all other passenger seats are first occupied.

The Authority has had a unique arrangement with the Public Carriage Office to allow dual licensing of vehicles which was initially intended to enable effective transition from the old Greater London

Authorities. With effect from 1 January 2014 the Authority no longer licensed new dual vehicles. There is an exception for existing Hackney Carriage Drivers that have been licensed with the Authority before 1 January 2013 if it can be proven that the London topographical knowledge test was in progress before that date.

AGENDA ITEM 4
ANNEXE 1

b. Advertising on vehicles

Hackney Carriages are permitted to have full advertising wraps on their vehicles subject to advertising standards approved by the TfL.

b. MOTs

An MOT Test Certificate which is no more than eight weeks old from the date of application must be presented on application, annual and interim inspections, an exception is made for vehicles which have covered less than 2000 miles.

Dual Licensed Vehicles are required to undertake separate roadworthy and mechanical fitness tests by the Public Carriage Office, and are therefore not required to produce a current MOT Test Certificate.

c. Insurance Certificate

An Insurance Certificate or Cover Note covering the Driver for Public Hire use must be provided on application, annual and interim inspections.

4. Application for a Private Hire Operators Licence

a. Disclosure & Barring Service (DBS)

An applicant must be a "fit and proper person" to hold a licence. Applicants for the grant of a licence are subject to an Enhanced DBS Check, and must subscribe to the DBS update service, unless the driver is licensed by another Authority.

b. Suitability of applicant

The suitability of an applicant and/or holder of an Operator Licence is the same standard as for Driver Licences, detailed in paragraph 1c above.

c. Knowledge Test

An applicant for a new Operator Licence (who has not been previously licensed by the Authority) will be required to undergo a Knowledge Test to show an understanding of the area and licence conditions and basic verbal understanding. An exception to this will be for operators who will be working solely on Home to School Run services under a contract with Surrey County Council.

d. Planning Permission

In the case of new applications, and business relocation, evidence of planning permission or confirmation from the Planning Department that consent is not required for use of the premises as a private hire operation must be produced before a licence will be granted

e. Maximum number of vehicles

A maximum of two vehicles may be operated from non-commercial premises (existing Operators Licences may continue to be renewed at the existing address with a higher number of vehicles).

f. Insurance Certificate

An Insurance Certificate or Cover Note covering the business for Public Liability and Employers Liability must be provided on application and renewal (as applicable).

AGENDA ITEM 4
ANNEXE 1

5. Licence Conditions

The licence holder will be required to sign their licence to confirm they accept and understand all the terms and conditions attached to the licence, including the Penalty Points Scheme.

6. Penalty Points Scheme

All licence holders are subject to the Penalty Points Scheme, and accept the licence on the basis that they fully accept the Scheme. The Penalty Points Scheme is attached as an annexe to this Policy.

Where 12 points or more have been accrued within a two year rolling period, or the same offence/breach has been committed twice in a 12 month period, the licence holder will be referred to the Licensing Panel. The Panel will determine if the licence should be revoked or suspended or may decide no further action is required. In addition, the Panel will determine if (all) the points shall remain on the licence or be removed.

All Licence Holders have a right to appeal any Penalty Points issued, by doing so in writing within seven days of receipt of the Penalty Points. The appeal will be heard by the Licensing Panel whose decision (as far as points issued) is final.

7. Enforcement

Where necessary any appropriate enforcement (including prosecution) will be carried out in a fair and consistent manner in accordance with:

- The Enforcement Concordat
- Epsom & Ewell Borough Council's Environmental Health Service Enforcement Policy
- The Regulators' Code 2014.

The Council will endeavour to avoid duplication with other regulatory regimes so far as possible, and ensure that data is shared where possible and practicable.

8. Refunds of Licence Fees

Once an application fee has been paid and a Licence issued, the payment is non-refundable, except in the case of 5 yearly Operator Licence fees which may be entitled to a pro-rata refund based upon the number of full years remaining on the licence.

Epsom & Ewell Borough Council

Hackney Carriage & Private Hire Licensing

Policy regarding the relevance of convictions and other related information

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1. Introduction

AGENDA ITEM 4 ANNEXE 2

- 1.1 This policy sets out the criteria to be taken into account by the Council when determining whether or not an applicant or an existing licence holder is a fit and proper person to be granted, have renewed or continue to hold a Hackney Carriage and/or Private Hire Driver Licence. In addition to criminal convictions the Council will also take into account other factors such as demeanour, attitude, general character, non-criminal behaviour and police or other relevant records or information from a reliable source.
- 1.2 Whilst this policy primarily applies to the determination of driver licences, where a conviction (as defined below) is considered relevant to the fitness and propriety/suitability of an individual to hold or be granted a Private Hire Operator Licence or vehicle licence, then this policy must be referred to in the determination of that licence/application.
- 1.3 The Council is mindful that each case must be considered on its merits and where exceptional circumstances demand, the Council may depart from this policy.
- 1.4 This policy provides guidance to any person with an interest in taxi and private hire licensing. In particular, but not exclusively:
- Applicants for a driver's, vehicle or private hire operator licence
 - Existing licensees whose licences are being reviewed or renewed
 - Licensing officers
 - Members of the licensing committee/Panel
 - Magistrates and Judges hearing appeals against local authority decisions
- 1.5 For renewal applications and current licence holders the policy will not be applied retrospectively. However the policy will be applied if any additional convictions are incurred or brought to the attention of the Council that would call into question a person's suitability to hold a licence.
- 1.6 It is the responsibility of Epsom & Ewell Borough Council (referred to as the Council) to issue Hackney Carriage and Private Hire licences under the Local Government (Miscellaneous Provisions) Act 1976, the Town Police Clauses Act 1847 and the Hackney Carriage Byelaws. In exercising this duty the Council must consider the need to ensure the safety of the public its primary consideration. Licences cannot be issued unless the person is considered to be 'fit and proper'.
- 1.7 In seeking to safeguard the safety of the public. The council will be concerned to ensure:
- That a person/applicant is fit and proper in accordance with Sections 51, 55 and 59 of the Local Government (Miscellaneous Provisions) Act 1976 (Part II)
 - That the person does not pose a threat to the public
 - That the public are safeguarded from dishonest persons
 - The safety of children, young persons and vulnerable adults

1.8 There is no judicially approved test of fitness and propriety and, accordingly, a number of local tests have developed. These tend to be based on a test similar to the following:

‘Would you (as a member of the licensing committee or other person charged with the ability to grant a hackney carriage driver’s licence) allow your son or daughter, spouse or partner, mother or father, grandson or granddaughter or any other person for whom you care, to get in to a vehicle with this person alone?’

If the answer to this question (or a similar test) is an unqualified ‘Yes’ then the test is probably satisfied. If there are any doubts in the minds of those who make the decision, then further consideration should be given as to whether this person is a fit and proper person to hold a hackney carriage driver’s licence.

1.9 The Council will undertake whatever checks it considers necessary to ensure that licences are not issued to unsuitable people. In assessing the suitability of an applicant or licence holder, the council will take into consideration the following factors:

- Criminality
- Number of endorsed DVLA driving licence penalty points
- The conduct of the applicant in making the application (e.g. whether they have acted with integrity during the application process).
- The previous licensing history of existing / former licence holders.

In addition, the Council will also consider further information from sources such as, but not limited to, the Police (including abduction notices), Children and Adult Safeguarding Boards, Multi Agency Safeguarding Hub, Social Services other licensing authorities, other departments within the Council, and statutory agencies.

1.10 In this policy, the word “applicant” refers to either new applicants, existing licence holders who are seeking renewal and existing licence holders who are being considered by the Council by virtue of offending activity having recently come to light.

1.11 In this policy, the word “conviction” is to be defined as including convictions, cautions, warnings, reprimands and other relevant information.

1.12 The Council reserves the right to overturn or annul a decision that has previously been made, or refuse a renewal of a licence, where clear errors are discovered.

1.13 As licensed drivers often carry unaccompanied and vulnerable passengers, the council will take a strong line in relation to applicants or existing licence holders with convictions for sexual offences. A licensed PHV or taxi driver is expected to be trustworthy. In the course of their working duties drivers will deal with cash transactions and valuable property may be left in their vehicles. Drivers may well deal with customers who are vulnerable or intoxicated and potentially easily confused. Taking drugs and driving poses an obvious risk to public safety,

whilst applicants who have convictions for the supply of drugs should also be treated with considerable concern, The nature and quantity of the drugs, whether for personal use or supply are issues which will be considered carefully. As licensees are professional vocational drivers, a serious view is taken of convictions for driving, or being in charge of a vehicle while under the influence of drink or drugs. More than one conviction for these offences raises significant doubts as to the applicant's fitness to drive the public.

2 General Policy

- 2.1 Whilst the Council may consider that an applicant with a conviction for a serious offence may not need to be automatically barred from obtaining a licence, it is however to be normally expected that the applicant would be required to:
- a. Remain free of conviction for an appropriate period as detailed below; and
 - b. Show adequate evidence that they are a fit and proper person to hold a licence (the onus will be on the applicant to produce such evidence). Simply remaining free of conviction may not generally be regarded as adequate evidence that an applicant is a fit and proper person to hold a licence.
- 2.2 The standards and criteria set out in paragraphs 4 to 18 below are those that would normally be applied to applications and licences. The Council may depart from these criteria, however it will only do so in exceptional circumstances. The otherwise good character and driving record of the applicant or licence holder will not ordinarily be considered as exceptional circumstances.

3 Powers

- 3.1 Section 61 of the Local Government Miscellaneous Provisions Act 1976 allow the council to suspend, revoke or refuse to renew a licence if the application/licence holder has been convicted of an offence involving dishonesty, indecency, violence, of failure to comply with the provisions of the Town Police Clauses Act 1847 or of failure to comply with the provisions of Part II of the Local Government (Miscellaneous Provisions) Act 1976, or if he/she has since the grant of the licence been convicted of an immigration offence or required to pay an immigration penalty, or for any other reasonable cause.
- 3.2 The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, allows the council to take into account all convictions recorded against an applicant or the holder of a Private Hire or Hackney Carriage driver's licence, whether spent or not. Therefore the council will have regard to all relevant convictions, particularly where there is a long history of offending or a recent pattern of repeat offending. Applicants need to be aware that, in accordance with this Act, all convictions, cautions, warnings and reprimands must be declared.

4 Consideration of disclosed criminal history

- 4.1 Under the provisions of Sections 51, 55 and 59, Local Government (Miscellaneous Provisions) Act 1976, the council is required to ensure that an applicant for the grant or renewal of a Hackney Carriage and/or a Private Hire Operator or Vehicle driver's licence is a "fit and proper"

person to hold such a licence. However, if an applicant has any convictions, warnings, cautions or charges awaiting trial, the council will look at:

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- How relevant the offence(s) are to the licence being applied for
- How serious the offence(s) were
- When the offence(s) were committed
- The date of the conviction, warning, caution etc.
- Circumstances of the individual concerned
- Any sentence imposed by the court
- The applicant's age at the time of offence / incident leading to the conviction, warning, caution etc.
- Whether they form part of a pattern of offending
- The applicant's attitude
- Any other character check considered reasonable (e.g. personal references if requested by the Council)
- Any other factors that might be relevant, for example:
 - The previous conduct of an existing or former licence holder,
 - Whether the applicant has intentionally misled the council or lied as part of the application process,
 - Information provided by other agencies/council departments.

Where an applicant has been convicted of a criminal offence, the licensing authority cannot review the merits of the conviction [Nottingham City Council v. Mohammed Farooq (1998)].

- 4.2 In this policy 'from date sentence has ended' is taken to be the date which is reached once the whole of the period as sentenced by the court has elapsed and not necessarily the length of time served by the applicant. For example, if a sentence is five years imprisonment then the date that the sentence ends will be five years from the date of sentencing – regardless of the amount of time actually served by the applicant. If the sentence is amended by a court at a later date then this new sentence becomes relevant for the purposes of this policy. The term 'since completion of sentence' is to be construed in a similar way.
- 4.3 Existing holders of driver's licences are required to notify the council in writing within five working days of receiving a driving licence endorsement, fixed penalty notice, warning, reprimand, police caution, criminal conviction or other criminal proceedings (including their acquittal as part of a criminal case). In addition, licence holders must inform the council within 3 working days of their arrest for any matter (whether subsequently charged or not). To fail to do so, will raise serious questions for the Council as to the honesty of the licence holder and will be taken into account as part of any subsequent renewal applications.
- 4.4 It is an offence for any person knowingly or recklessly to make a false declaration or to omit any material particular in giving information required by the application for a licence (s57 Local Government (Miscellaneous Provisions) Act 1976). Where an applicant has made a false statement or a false declaration on their application for the grant or renewal of a licence, the licence will normally be refused.
- 4.5 Any offences or behaviour not expressly covered by this Policy may still be taken into account.

5 Options when determining an application/licence

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5.1 When determining an application or reviewing an existing licence in relation to convictions or other relevant information the Council have the following options:

- grant the licence or take no further action
- grant the licence with additional conditions
- refuse, revoke, or suspend the licence
- issue a warning which may include the use of penalty points

5.2 If a licence holder's conduct is such that, were they to be applying for a new licence their application would normally be refused, they should expect consideration to be given as to the suspension or revocation of their licence.

6. Offences involving violence

6.1 Licensed drivers have close regular contact with the public. A licence will not normally be granted if the applicant has a conviction for an offence that involved the loss of life such as:

- Murder
- Manslaughter
- Manslaughter or culpable homicide while driving
- Terrorism offences
- Any offences (including attempted or conspiracy to commit offences) that are similar to those above.

6.2 A licence will not normally be granted until at least 10 years have passed since the completion of any sentence and / or licence period following conviction for an offence shown below:

- Arson
- Malicious wounding or grievous bodily harm which is racially aggravated
- Actual bodily harm
- Assault occasioning actual bodily harm
- Grievous bodily harm
- Robbery
- Possession of firearm
- Riot
- Assault Police
- Violent disorder
- Common assault
- Resisting arrest
- Any racially-aggravated offence against a person or property
- Affray
- Any offence that may be categorised as domestic violence
- Harassment, alarm or distress, intentional harassment or fear of provocation of violence
- Any offence (including attempted or conspiracy to commit offences) similar to those

above.

- 6.3 A licence will not normally be granted until at least 5 years have passed since the completion of any sentence and / or licence period following conviction for an offence shown below:
- Obstruction
 - Criminal damage
 - Any offences (including attempted or conspiracy to commit offences) that are similar to those above.

- 6.4 A licence will not normally be granted if an applicant has more than one conviction for an offence of a violent nature.

7. Offences involving a weapon (not a firearm)

- 7.1 If an applicant has been convicted of possession of a weapon or any other weapon related offence, this will give serious concern as to whether the person is fit to carry the public. For firearms offences see 6.2.
- 7.2 Depending on the circumstances of the offence, an applicant should be free of conviction for 5 years (or at least 5 years must have passed since the completion of the sentence, whichever is longer), before a licence is granted.
- 7.3 2 or more convictions for a violent offence will normally result in an application being refused.

8. Sexual and indecency offences

- 8.1 All sexual and indecency offences will be considered as serious. Applicants with convictions for sexual or indecency offences that involve a third party will normally be refused. Such offences include:
- Rape
 - Assault by penetration
 - Offences involving children or vulnerable adults
 - Trafficking, sexual abuse against children and / or vulnerable adults and preparatory offences (as defined within the Sexual Offences Act 2003).
 - Making or distributing obscene material
 - Possession of indecent photographs depicting child pornography.
 - Sexual assault
 - Indecent assault
 - Exploitation of prostitution
 - Soliciting (kerb crawling)
 - Any sex or indecency offence that was committed in the course of employment as a taxi or PHV driver
 - Making obscene / indecent telephone calls
 - Indecent exposure
 - Any similar offences (including attempted or conspiracy to commit) or offences

which replace the above

8.2 In addition to the above the council will not normally grant a licence to any applicant who is or has ever been on the Sex Offenders Register or similar register.

9. Dishonesty

9.1 A serious view is taken of any conviction involving dishonesty.

9.2 A minimum period of 5 years free of conviction or at least 5 years since the completion of sentence (whichever is longer) is required to have passed before a licence is granted. Offences involving dishonesty include:

- theft
- burglary
- fraud
- benefit fraud
- handling or receiving stolen goods
- forgery
- conspiracy to defraud
- false representation
- obtaining money or property by deception
- other deception
- taking a vehicle without consent
- fare overcharging
- or any similar offences (including attempted or conspiracy to commit) or offences which replace the above

9.3 A licence will not normally be granted if an applicant has more than one conviction for a dishonesty offence.

9.4 Applicants or existing licence holders that are found to have intentionally misled the council, or lied as part of the application process, will normally be rejected or refused.

10. Alcohol and Drugs

10.1 A serious view is taken of convictions for driving, or being in charge of a vehicle while under the influence of drink or drugs or where the driver has been found to be under the influence of psychoactive substances.

10.2 At least 5 years, after the restoration of the DVLA driving licence following a drink drive or driving when under the influence of drugs conviction should elapse before an application will be granted.

10.3 A licence will not normally be granted where the applicant has more than one conviction for offences related to the possession of drugs and has not been free of conviction for 10 years or at

least 10 years have passed since the completion of any sentence and/or licence period, whichever is the greater. There will then be full consideration of the nature of the offence and the quantity /type of drugs involved.

- 10.4 A licence will not normally be granted where the applicant has a conviction for an offence related to the supply of drugs.
- 10.5 If there is evidence of persistent drugs or alcohol use, misuse or dependency a specialist medical examination (in accordance with DVLA Group 2 medical standards) and a satisfactory medical report may be required before the licence is granted. If the applicant was an addict (drug or alcohol) then they would be required to show evidence of 8 years free from drug taking after detoxification treatment.
- 10.6 A licence will not normally be granted for drunkenness offences not involving a motor vehicle for a period of one year after a single conviction and 2 years after 2 or more convictions within 2 years of each other.

11. Driving offences involving the loss of life

- 11.1 A very serious view is to be taken of any applicant who has been convicted of a driving offence that resulted in the loss of life.
- 11.2 A licence will not normally be granted if an applicant has a conviction for:
- Causing death by dangerous driving
 - Causing death by careless driving whilst under the influence of drink or drugs
 - Causing death by careless driving
 - Causing death by driving: unlicensed, disqualified or uninsured drivers
 - Or any similar offences (including attempted or conspiracy to commit) offences which replace the above

12 Other traffic offences

- 12.1 Traffic offences such as driving without due care and attention, reckless driving, more serious speeding offences (usually dealt with by a court), or offences of a similar nature will give rise to serious doubts about the applicant's suitability to be a driving professional. An applicant with any such convictions will be required to show a period of at least 1 year free of such convictions. For applicants with more than one offence this should normally be increased to 2 years.
- 12.2 At least three years should elapse (after the restoration of the DVLA driving licence), before a licence would be granted for a Hackney Carriage or Private Hire drivers licence.
- 12.3 Traffic offences such as obstruction, some speeding offences (usually dealt with by means of a fixed penalty), pedestrian crossing offences, traffic light offences waiting in a restricted area, or offences of a similar nature may not ordinarily merit refusal. However, with existing licensees

they may be subject to separate consideration as part of the Penalty Points scheme.

- 12.4 In cases where the courts have imposed a disqualification in respect of the DVLA driving licence, the periods stated above should normally commence from the date of the restoration of the licence.
- 12.5 In this policy, the term “disqualification” refers to the period served, in order to take account of the fact that a court may reduce the period of disqualification from driving. An applicant must provide evidence in advance to prove that the court agreed a reduction in the period of disqualification.
- 12.6 In “totting up” cases where disqualification is considered by the Court, even if the court does not disqualify (e.g. because of exceptional circumstances) a driver, the licensing authority is likely to refuse a hackney carriage or private hire driver’s licence because different criteria apply. An applicant will normally be expected to show a period of 12 months free from conviction from the date the court made its finding of exceptional circumstances justifying the non-disqualification.

13 Outstanding Charges or Summonses

- 13.1 If the individual is the subject of an outstanding charge or summons their application can continue to be processed, but the application will need to be reviewed at the conclusion of proceedings.
- 13.2 If the outstanding charge or summons involves a serious offence and the individual’s conviction history indicates a possible pattern of unlawful behaviour or character trait, then in the interests of public safety the application may be put on hold until proceedings are concluded or the licence may be refused.

14 People banned from working with children and vulnerable adults

- 14.1 A serious view is to be taken of any applicant or licence holder who has been banned from working with children or vulnerable adults. A licence will not be normally be granted if an applicant has been found unfit to work with children or vulnerable adults.

15 Non-conviction information

- 15.1 The Council will take into account intelligence which has not led to a conviction. This may include but not be limited to information regarding acquittals, circumstances in which convictions were quashed due to misdirection to the jury, circumstances where the decision was taken not to prosecute, situations where the person has been arrested and bailed but not yet charged, civil penalties and complaints from the public. In considering the most appropriate action to take following the receipt of information), the credibility of both the witness / complainant and the licence holder will be taken into account.
- 15.2 If an applicant has been arrested or charged, but not convicted, for a serious offence which suggests he could be a danger to the public, consideration should be given to refusing the

application or revoking an existing licence.

15.3 In assessing the action to take, public safety will be the paramount concern. Decisions will be taken on balance of probability.

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15.4 A licence will not normally be granted until at least 1 year has elapsed since a Criminal Behaviour Order.

16 Licensing Offences

16.1 Offences under taxi and private hire and associated legislation such as plying for hire without a licence, overcharging and refusing to carry disabled persons will prevent a licence being granted or renewed until a period of 3 years has passed since conviction.

17 Insurance Offences

17.1 A serious view will be taken of convictions for driving, being in charge of a vehicle without insurance, or allowing person to drive whilst uninsured. A previous isolated incident will not necessarily stop a licence being granted provided an individual has been free of conviction for 3 years. However strict warning should be given as to future behaviour. More than one conviction for these offences will prevent a licence being granted or renewed.

17.2 An operator found guilty of aiding and abetting the driving of passengers for hire and reward without insurance will have his Operator's Licence reviewed with a view to revocation and will not be permitted to hold a licence for a period of at least 3 years from the date of any revocation.

17.3 Where a specific offence is not mentioned, a suitable period of time will be determined by reference to offences described. The Council reserves the right to refuse a licence where there are aggravating circumstances, even where these guidelines would otherwise indicate that a licence might be granted.

18 Applicants with periods of residency outside the UK

18.1 Because of the potential lifetime relevance for some of the most serious offences mentioned in this policy, the Council will need to ensure that sufficient background checks are conducted for those applicants who have lived overseas. For EU nationals a disclosure that is similar to the UK DBS will be required, for those countries for which checks are not available, the council will require a certificate of good conduct authenticated by the relevant embassy.

18.2 If an applicant has spent six continuous months or more overseas (since the age of 16) the council will expect to see evidence of a criminal record check from the country / countries visited covering the period.

19 Summary

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- 19.1 Whilst a criminal history in itself may not automatically result in refusal and a current conviction for a serious crime need not bar an applicant permanently from becoming licensed, in most cases, an applicant would be expected to have remained free from conviction for 3 to 10 years (detailed above), before an application is likely to be successful. If there is any doubt about the suitability of an individual to be licensed, the Council will be mindful of the need to protect the public and caution will be exercised.
- 19.2 While it is possible that an applicant may have a number of convictions that, individually, do not prevent a licence from being granted, the overall offending history will be considered when assessing an applicant's suitability to be licensed. A series of offences over a period of time is more likely to give cause for concern than an isolated minor conviction. Some discretion may be afforded if an offence is isolated and there are mitigating circumstances, but the overriding consideration is the protection of the public.

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LOCAL PLAN ISSUES & OPTIONS CONSULTATION - OUTCOMES AND WAY FORWARD

<u>Report of the:</u>	Head of Place Development
<u>Contact:</u>	Karol Jakubczyk
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	
<u>Annexes/Appendices (attached):</u>	Annexe 1: Questionnaire Responses Annexe 2: Issues & Options Consultation Summary Report
<u>Other available papers (not attached):</u>	Local Plan Issues & Options Paper September 2017 Local Plan Programme 2017

REPORT SUMMARY

During the Autumn the Borough Council held an Issues and Options Consultation on the partial review of the Borough-wide Core Strategy. The consultation focused upon the housing growth challenges facing the Borough. This report provides an overview of the responses received during the consultation. It also sets out the Officers' responding comments and any suggested actions. The report concludes by identifying the suggested way forward, which it is anticipated will take the process towards Pre-Submission consultation during May 2018.

RECOMMENDATION (S)

- (1) That the Members of the Committee consider the responses made to the Issues & Options Consultation as set out under Annexes 1 and 2. Subject to any changes or amendments that both Annexes be published as a record of the Consultation; and
- (2) That the Committee consider and agree Option 4 as the way forward for the Local Plan; subject to any suggestions or advice from Members.

Notes

1 Implications for the Council's Key Priorities, Service Plans and Sustainable Community Strategy

- 1.1 The Council's Local Plan provides the spatial planning mechanism for implementing the vision set out in the Sustainable Community Strategy, and the Council's Key Priorities. The Partial Review of the Core Strategy is a critical component of the Local Plan as it will set out the strategy for housing growth for the next plan period. It will also set out the scale of new housing that the Borough Council will seek to plan for and the sites that be allocated to meet that objective.
- 1.2 The Annual Service Plan includes related planning policy objectives and an overarching objective of Economic Vitality, the achievement of which will be influenced by how the Borough responds to housing demand.

2 Background

- 2.1 Since we adopted our Core Strategy policies there has been considerable change to national policy and planning in general – specifically in terms of how we meet future housing need. Notably the recent Housing White Paper saw the government concede that the nation is not building enough new homes fast enough. Their subsequent “Planning for the right homes in the right places” consultation identified a series of proposed state interventions, including top-down housing targets for all local planning authorities that seek to “get Britain building again”.
- 2.2 Under this backdrop it has become increasingly clear that our Local Plan housing policies are no longer up-to-date or in accordance with national policies. This is in spite of our having a good record of meeting the housing needs identified in our current policies. This has required us to review our housing policies.
- 2.3 Work on the partial review of the Core Strategy has been underway since 2015. During that time the focus has been upon developing an up-to-date evidence base that is consistent with national planning policy. Our evidence formed the basis for the Issues & Options Consultation.
- 2.4 The Issues & Options Consultation Paper set out the reasons behind the partial review; the challenges that we face in accommodating our objectively assessed housing need; the additional challenges being posed by the government; and the available, deliverable and developable options that respond to national planning policy and the predicted housing demand.
- 2.5 The consultation ran from Monday 25 September 2017 until Monday 6 November 2017. In order to provide further opportunity for our residents and communities to make their views known we kept the Consultation actively running for an additional week.

- 2.6 The Issues & Options Consultation was not limited to the on-line questionnaire. During the Consultation period we ran a series of Surgery Sessions, which provided interested parties an opportunity to ask questions about the challenges of meeting housing demand and how we might respond. Officers attended a number of public meetings, presenting and answering about the challenges and options. These meetings were well attended.
- 2.7 Although the Issues & Options Consultation was in the main engineered to provide an opportunity for residents and local communities, there were equal opportunities for those with a development interest to engage in the process. Principally this came through the “call-for-sites” exercise that ran alongside the Consultation. Those seeking to promote sites for allocation as sources of housing land supply were also given the opportunity to meet with Officers to discuss the detail of how their sites could contribute towards meeting our local needs.
- 2.8 Alongside the above mentioned consultations we also ran a parallel exercise seeking comments on our emerging Sustainability Appraisal Report. While this exercise was open to all, the focus was to obtain input from the three statutory consultees – the Environment Agency, Natural England and Historic England.
- 2.9 The responses to the Questionnaire are set out under Annexe 1, which also includes Officers’ comments. Annexe 2 provides overviews of the whole Consultation process and the key issues that have been raised; this includes a breakdown of the written responses received (these being in addition to the Questionnaire responses). The two Annexes should be read together.

3 Consultation Responses

- 3.1 Having now fully considered the content of the consultation responses we believe that the Issues & Options Consultation can be considered a success. It is notable that we received in excess of 600 responses to our questionnaire, which is our highest for a local plan consultation. We also met a wide variety of local interest groups; presented to around 200 people at the evening meetings; and met with most of the development/landowner interests that have come forward to date. The scale of our consultation was necessarily constrained by the resources available. It is worth highlighting that while one of our near neighbours succeeded in generating more responses to their Issues & Options consultation they expended a far greater financial and staff resource to make that gain.
- 3.2 The questionnaire response and the comments raised at the meetings generated a wide range of useful and helpful comments that we will use to inform the plan making process. The qualitative value of the responses outweighs any perceived quantitative shortcomings.

- 3.3 The responses are finely balanced in terms of support for Option 4 – the ‘balanced approach’ to future growth. Nevertheless, the majority of responses agreed that Option 4 was the “least bad” approach for going forward. There was little in the way of support for Options 2 (release some Green Belt) and 3 (significant release of Green Belt). The only vocal support for an “all-out growth” approach came from a small sector of the development industry. It is noteworthy that while only 30% of responses to Question 1 supported Option 1 (urban intensification), the responses to Question 8 demonstrate that a significant number of responses are supportive of urban intensification and taller buildings in the right locations – subject to maintaining and enhance visual character and appearance. It is also worth highlighting that a significant number of responses support the retention of local parks and open spaces - particularly in the north of the Borough.
- 3.4 A key point for the Borough Council is that the responses demonstrate some sections of local communities and the development industry do not fully understand the purpose of Green Belt policy and how a review process would work. We have begun to address this through the Officer comments, which seek to provide a more detailed explanation of the policy context. It is advised that future communication and consultation on the Local Plan provides further clarity so that people make more informed responses.
- 3.5 Equally, some responses suggest that there is a knowledge gap in respect of what urban intensification could look like. We can address this by preparing more evidence; such as the emerging Green Belt Study Stage 2 and a paper setting out how we could achieve higher densities in the urban area. Work on both of these studies is already underway.
- 3.6 We believe that it is particularly significant that a majority of questionnaire responses and the written representations support meeting local affordable housing need – ahead of any other housing need. Indeed, many responses suggested that we should only be meeting affordable needs, or seeking a significantly higher proportion (80%) of affordable provision as part of new development. This support is welcomed – however, meeting this aspiration will be extremely challenging because of the policy and viability constraints put in place by government. The high level site allocation viability appraisal work, which will form part of our Local Plan evidence, will further inform this area of policy development.
- 3.7 We consider it positive that the consultation responses identified a range of sites that people believed to be suitable as potential sources of housing land supply. We are in the process of assessing the new sites that were identified by residents and land promoters. Those that are available and deliverable will be taken forward for consideration as possible site allocation options.

- 3.8 A small but notable number of responses disagreed with the objectively assessed housing need figure – particularly that proposed by government. These responses urged us to challenge or ignore these figures. While we have sympathy with some of these responses, we would face considerable risk in taking such a position. In contrast and unsurprisingly some developer responses suggest that the government’s proposed standard methodology provides a more accurate reflection of housing need and that our SHMA “significantly underestimates need”. We believe such statements are irresponsible, divisive and are not conducive to achieving a sustainable and deliverable solution to the housing crisis.
- 3.9 Many responses expressed concern about the necessary infrastructure that will be required to support future homes. Responding to this will be challenging as Local Plan Inspectors have not placed great weight on infrastructure capacity as a constraint to growth taking place. We recommend that the Borough Council, and its infrastructure partners, explore innovative and cost-effective solutions to this issue – rather than continuing traditional costly solutions. This may include expanding, improving and completing our pedestrian and cycle route networks. These measures would over time seek to enable modal-shift towards sustainable travel for local journeys.
- 3.10 Responses were also received from infrastructure providers. Thames Water Utilities Ltd stressed the need for adequate water and sewerage infrastructure to be delivered prior to development and requested a strengthening of the policy requirements in the Local Plan. Similarly, Surrey Police have advised that the Local Plan should include planning policy to reduce opportunities for crime and reduce the perception of crime. Furthermore, the Local Plan should also ensure there is an effective mechanism to provide new emergency services infrastructure to the meet the needs of the increasing population of Epsom & Ewell.
- 3.11 The Environment Agency commented that the Council should identify the risk of flooding from all sources and that flood risk and the history of flooding should be fully considered on sites put forward for development.
- 3.12 Responses were also received from our Duty to Co-operate partners, including from Surrey districts and boroughs and the Greater London Authority all of which share in the challenge of meeting housing need.
- 3.13 Correspondence from the Housing Market Area partners (Elmbridge Borough Council, Mole Valley District Council and the Royal Borough of Kingston Upon Thames) acknowledged the challenge of responding to housing need. All confirmed their commitment to on- going discussions and co-operation to responding to unmet housing need and strategic issues such as infrastructure and Green Belt.

- 3.14 Surrey County Council commented that when it is clearer as to where the development will be located and its scale, they will work with the Council to assess the impacts on the highway and transport network and to seek any necessary mitigation measures. The response also highlighted the need to work together to ensure that sufficient additional provision including education is made to support any new development proposed in the local plan.
- 3.15 The Greater London Authority and Transport for London highlighted the additional capacity and connectivity that the borough will benefit from through Crossrail 2, which could assist in delivering higher levels of growth in appropriate locations. Transport for London and Network Rail (the bodies promoting Cross Rail 2) consider these locations to be centred upon the railway stations that will serve Cross Rail 2 – namely, Stoneleigh, Ewell West and Epsom Railway Stations.

4 The Way Forward

- 4.1 The valuable input from the Issues & Options Consultation responses supports the conclusion that the Borough Council continues to maintain progress on the production and preparation of the Borough Local Plan, specifically in terms of planning for new homes. In that respect, we recommend that we continue to work towards meeting the adopted timetable set out in the Local Plan Programme.
- 4.2 In order to maintain progress it is clear, from the consultation responses, that we need to continue the development of our evidence base. This specifically encompasses the completion of our Green Belt Study Stage 2; the review of our Strategic Flood Risk Assessment; further assessments of infrastructure capacity (including highway modelling); and the preparation of high level site allocation viability appraisal. Many of these studies are already underway and it is anticipated that most will report during the first quarter of 2018. We will keep the Committee fully apprised of their progress.
- 4.3 The consultation has revealed that most residents and community groups (who took part) understand that we have to plan positively for future housing growth. We cannot ignore the challenges being placed upon us and hope that they will go away. Within that context, we recommend that the Committee agrees that Officers develop Option 4 as the available and deliverable sustainable response to our objectively assessed housing need. The 'worked-up' version of Option 4 will sit at the heart of a Draft pre-Submission Document, which will initially be presented to all Members at a Briefing Session before coming to this Committee during March 2018. Should we meet this ambitious timetable, the Pre-Submission document could then be the subject of public consultation; with submission to the Secretary of State taking place (at the earliest) during May 2018.

- 4.4 In order to develop Option 4, we will need to accept higher density housing development and taller residential buildings in appropriate locations. The consultation responses have helped us confirm that these include town and retail/ commercial centres; transport nodes – specifically those centred upon our railway stations; and at locations along major transport corridors. This may lead us to review our existing housing development density policy and our approach to tall buildings (at these specific locations). Many respondents stated that they would be prepared to accept this if it reduced our reliance upon releasing land currently within the Green Belt.
- 4.5 While increased urban intensification will make a contribution towards responding to our objectively assessed housing need, evidence shows that we will still be significantly short in terms of housing numbers. The government has clarified that housing need is a trigger for the “exceptional circumstances” required to review and release land currently designated as Green Belt. If we are to convince our future Local Plan Inspector, and the Secretary of State, that we are serious about responding to the challenges of housing demand then we will need to seriously consider this as part of Option 4.
- 4.6 Our emerging Green Belt Study Stage 2 will inform and guide our approach to the consideration and release of land currently within the Green Belt. The release of land would enable the identification of suitable development sites for allocation within the Local Plan. Evidence suggests that even if we release land from the Green Belt we will still be short of meeting our objectively assessed housing need.

5 Financial and Manpower Implications

- 5.1 The preparation and implementation of the Council’s Local Plan imposes significant demands on staff in the Planning Policy Team and the wider Place Development Service. The processes, timetable and staff resource implications are set out in the latest version of the Local Plan Programme (July 2017).
- 5.2 Additional staff resources have been secured until the end of December 2018 and will be deployed to ensure that the Local Plan Programme is met in accordance with its timetable. Additional resources may be required beyond 2018 to deliver the programme to the agreed timetable. A review of existing work priorities will be undertaken to establish the need for additional funding, any extension to staffing will be subject to identification and agreed use of reserves by Strategy & Resources Committee.

- 5.3 **Chief Finance Officer's comments:** Additional funding from the 5 percent admin fee element of Community Infrastructure Levy receipts was agreed to fund up to £80,000 in total over two years to support the delivery of the Local Plan. Any request for the use of any additional funding will need to be agreed by the Strategy and Resources Committee.

6 Legal Implications (including implications for matters relating to equality)

- 6.1 All statutory Local Plan documents are subject to public examination. The recently adopted "Your Involvement in Planning" document addresses those equality issues related to consultation and engagement.

- 6.2 **Monitoring Officer's comments:** The Town and Country Planning (Local Planning) (England) Regulations 2012 build on the statutory framework in relation to the preparation and adoption by local planning authorities of local plans. The Regulations set out the procedure to be followed by local planning authorities in relation to the preparation of local plans, including as to consultation with interested persons and bodies and the documents which must be available at each stage.

Regulation 18 provides that the Council must notify certain persons and bodies of the subject of the local plan which the Council proposes to prepare and invite them to make representations about what that local plan ought to contain. In preparing the local plan, the Council must take into account any representations. This report seeks to comply with the statutory requirements for preparation of the local plan.

7 Sustainability Policy and Community Safety Implications

- 7.1 The partial review of our Local Plan will contribute towards delivering the Council's objectives for maintaining and enhancing the Borough as a sustainable place to live, work and visit by providing guidance to new development proposals.
- 7.2 Sustainability Appraisal of the policy options forms an integral part of the plan-making process. The Sustainability Appraisal Report is subject to consultation. An Appraisal Report of the proposed consultation options was consulted upon in parallel to the Issues & Options Consultation Paper. The responses to that consultation are set out under Annexe 2.

8 Partnerships

- 8.1 The Localism Act and national planning policy state that public bodies have a duty to co-operate on planning issues that cross administrative boundaries. We are seeking to meet this duty by working collaboratively with our partners in neighbouring boroughs and districts on issues of common interest. We are beginning to make progress with our immediate partners in the Kingston and North East Surrey Housing Market Area. We are also seeking to develop our relationship with the Greater London Authority. Securing these relationships will be an important in taking our Local Plan through the examination process.
- 8.2 This is a continuous and evolving process that will help guide future policy development. Where it is necessary and appropriate we will seek the active involvement of the Committee in order to secure agreement on strategic cross-boundary issues.

9 Risk Assessment

- 9.1 In 2015 the government issued a requirement that all local planning authorities must produce new local plans for new homes by 2017. The recent government consultation, "Planning for the Right Homes in the Right Places", identified a new deadline of March 2018, after which local planning authorities will be required to use the government's standard methodology for calculating their objectively assessed housing need. There is a risk that our failure to make progress against these challenging timetables could lead to intervention in our plan-making process by the government. A greater risk comes in the form of predatory developers who are known to take advantage of out-of-date local plans to justify proposals that would normally be unacceptable. Maintaining forward progress is the best defence against these risks.
- 9.2 Although we will neither achieve the above deadline nor are we likely to be able to deliver all of our objectively assessed housing need, we are responding positively to the challenge of planning for future housing growth. By pursuing Option 4 we believe that we will be able to demonstrate that we are planning to deliver as much new housing as sustainably possible – given the Borough's primary constraints and lack of available sources of housing land supply. The possible releases of Green Belt land that are associated with Option 4 do present a potential risk. We are seeking to address these risks through regular engagement with Members and Senior Officers. The full and open dissemination of information to our residents and communities will also help in managing this risk.

- 9.3 Planning for future housing growth is challenging. Whichever Option is chosen, there will be a high risk that the associated site allocations will generate strong objections for residents, local communities and developers promoting competing sites/ options. We can minimise this risk by ensuring that our decision making process clear, sequential and supported by robust evidence.
- 9.4 While we are confident that we can present a robust case to justify not meeting all of objectively assessed housing need, the issue of how we respond to any unmet need remains. Recent experiences elsewhere demonstrate that we have to prepare a robust strategy to address this issue. Failure to do so will result in our Plan being found unsound, with all of the risk that are commensurate with such an outcome. We are seeking to manage this issue collectively with our Housing Market Area Partners. We will keep Members apprised of progress on this matter.
- 9.5 There is significant risk associated with staff retention. The Planning Policy Team currently has sufficient resources to progress the Local Plan – this comes in the form of experienced and knowledgeable staff who are very familiar with the Borough and challenges of planning for growth. Recent experiences have shown that the Local Plan timetable is vulnerable to staff leaving the Borough Council. The impact of one or two members of the Planning Policy Team leaving could be significant both in terms of meeting the timetable and our ability to progress the Plan through examination.

10 Conclusion and Recommendations

- 10.1 The Committee are asked to consider the responses made to the Issues & Options Consultation, and any associated Officers' comments, as set out under Annexes 1 and 2.
- 10.2 In light of the consultation responses, the Committee are asked to support Option 4 as the forward for the Local Plan Review process. Subject to any suggestions or advice from the Committee, Officers be instructed to prepare the Draft Pre-Submission document in accordance with the agreed timetable.

WARD(S) AFFECTED: (All Wards);

Epsom & Ewell Local Plan Partial Review of Core Strategy – Consultation Responses



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Introduction

This Paper provides a detailed overview of the responses and comments made via the Interactive web-based Questionnaire during the Issues & Options Consultation. It also takes account of the small number of Questionnaires submitted as hard paper copy responses.

During the Issues & Options Consultation we engaged with people in the following ways –

- Internal Consultation – with Members and Leadership Team
- Statutory Consultees – Natural England; Historic England; and the Environment Agency
- Web-based Questionnaire – including hard paper copies
- Written responses – specifically those that went beyond the question posed in the Questionnaire
- Call-for-sites exercise
- Presenting to Public Meetings – Epsom & Ewell Labour Group; Auriol & Stoneleigh RA Group; Ewell Village RA Group; and College Ward RA Group
- Surgery Sessions with Key Stakeholders – Surrey County Council (infrastructure); the Epsom Civic Society; the Campaign for the Protection of Rural England; the Standing Committee of Residents' Associations; Conservative County Councillor; and two Borough Council Members
- We also met with those promoting sites.

We will cover the responses received through the above mechanism as follows.

Issues & Options – Our Future in Your Hands Questionnaire

This Questionnaire served as the Borough Council's primary engagement mechanism during the Issues & Options Consultation. It was designed to be concise, to the point and straightforward to understand and answer. It sought views on the update of the Local Plan. It set out the evidence that had been collected to date in support of the Local Plan Review – particularly in relation to the objectively assessed housing need; the scale of affordable housing; and the availability of deliverable and developable sites to meet the assessed need. The Questionnaire also provided clarification on the government's role in identifying an objectively assessed housing needs figure for the Borough, the housing crisis and the future status of the Green Belt.

The Questionnaire was specifically designed to generate interest and gain responses from residents and local communities. While it was available to all, and indeed a wide variety of stakeholders responded to the Questionnaire, most of responses came from residents and local community interest groups. Other stakeholders, such as infrastructure partners, landowners, and the development industry were provided with other appropriate avenues of engaging with the Issues & Options Consultation.

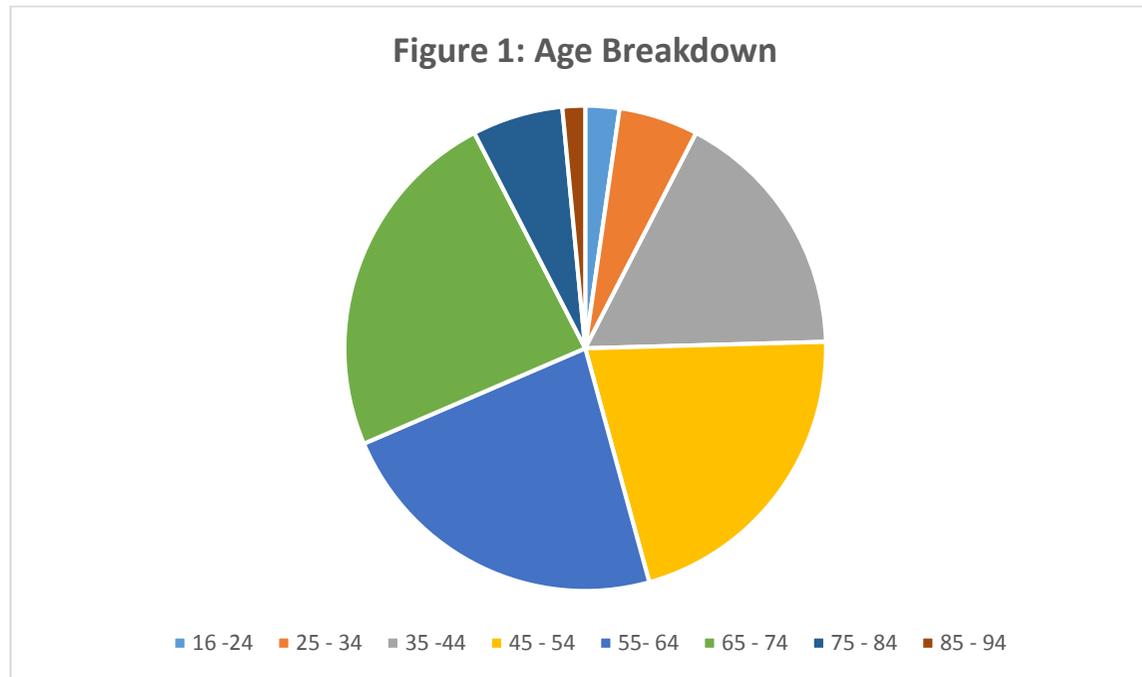
The Questionnaire set out four possible options to respond to the challenges facing the Borough – these being achievable, deliverable and developable options within the context of national planning policy, housing land supply and on-the-ground conditions. The Questionnaire did not suggest options that would be contrary to national planning policy or unachievable. The Questionnaire sought responses on the following Options:

- Option1 Urban Intensification – continue to develop within the existing urban area and meet all of housing need by delivering housing at a higher density and building height
- Option 2 Release some Green belt land for new homes – extend the urban area where appropriate by amending the Green Belt boundary and thereby meet our long term objectively assessed housing need
- Option 3 Significant release of Green Belt land to meet all of our objectively assessed housing need and more
- Option 4 Striking a balance – seeking to meet as much of objectively assessed housing need as sustainably possible. This could involve a combination of urban intensification at sustainable locations and reviewing the Green Belt boundary where necessary

Overview of Questionnaire Responses

During the Issues & Options Consultation we received full or partially completed questionnaires from **508** named individuals and organisations. We received a further full or partially completed questionnaires from **62** parties who chose not to identify themselves. In total we received **570** full or partially completed questionnaires.

The age range of respondents was as follows:



As can be seen in Table 1, the majority (nearly 75%) of respondents fell within the 35 – 74 age brackets. Given the demographic make-up of the Borough’s residents and local community organisations this is considered to be relatively representative.

Question 1: Should we adopt Option 1 and rely on urban intensification using high densities?

During the consultation we received 512 responses to this question. Of these 31% (160) of responses stated **YES** we should rely on urban intensification using high densities. In contrast 69% (356) of responses stated **NO**.

Question 2 - Should we follow Option 2 and review our Green Belt boundaries in order to help meet our long-term housing needs?

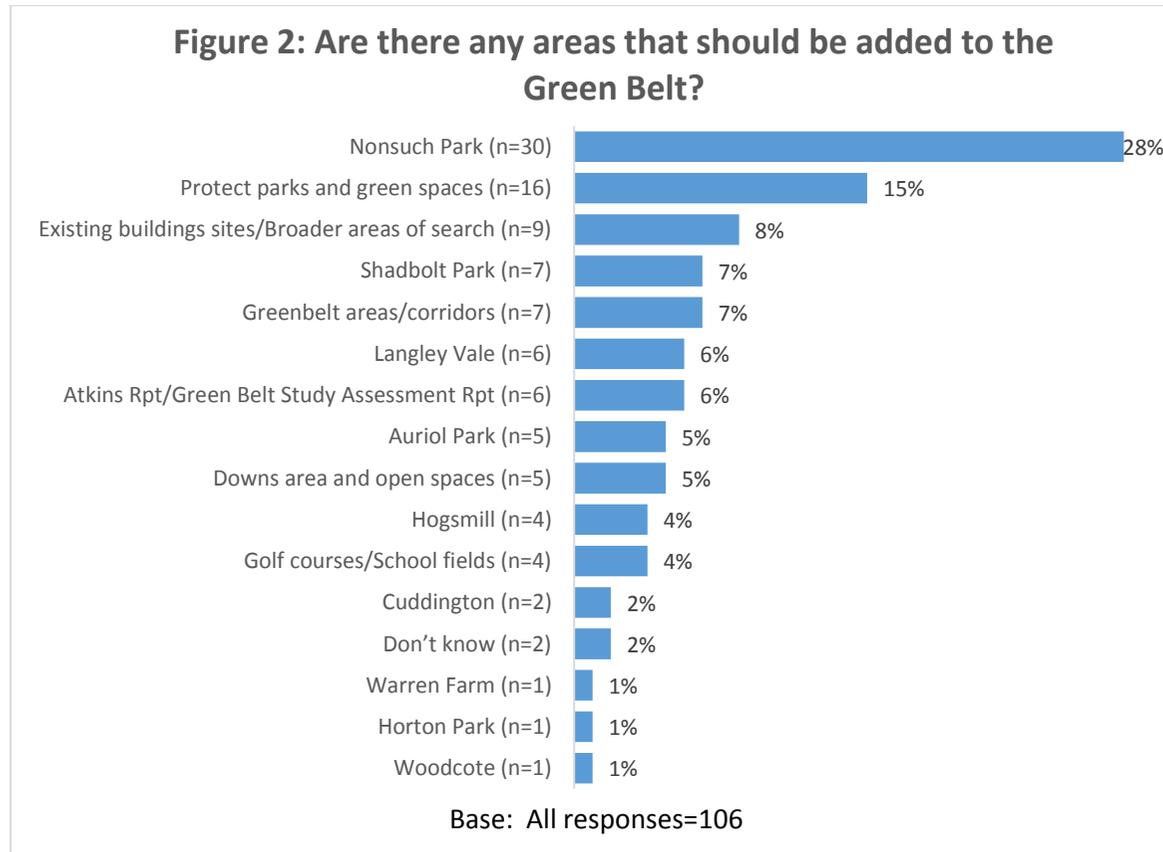
During the consultation we received 513 responses to this question. Of these 22% (111) of responses stated **YES** we should review our Green Belt boundaries in order to help meet our long-term housing needs. In contrast 78% (402) of responses stated **NO**.

Question 3 – Are there any areas that should be added to the Green Belt?

During the consultation we received 475 responses to this question. Of these 22% (106) of responses stated **YES** they believe that there are areas that should be added to the Green Belt. In contrast 78% (369) of responses stated that there are **NO** areas that should be added to the Green Belt.

Question 3a asked respondents to identify areas that could be considered for inclusion within the Green Belt

During the Consultation 88 respondents commented on this Question. These comments identified the following areas for possible inclusion in the Green Belt.



Question 4 - Would you be willing to support Option 3 - using extensive areas of the Green Belt?

During the Consultation we received 517 responses to this Question. Of these responses, 94% (488) stated **NO** they would support the use of extensive release of Green Belt land to help meet objectively assessed housing needs. Only 6% (29) of the responses stated **YES** they would support future growth being accommodated under an Option 3 approach.

Question 5 – Would you be willing to accommodate the housing need of other areas outside of the Borough?

During the Consultation we received 505 responses to this Question. Of these the majority, 85% (430) stated **NO** they would not be willing for the Borough to help meet the objectively assessed housing needs of areas outside of the Borough. Only 15% (75) of responses expressed any support for this approach.

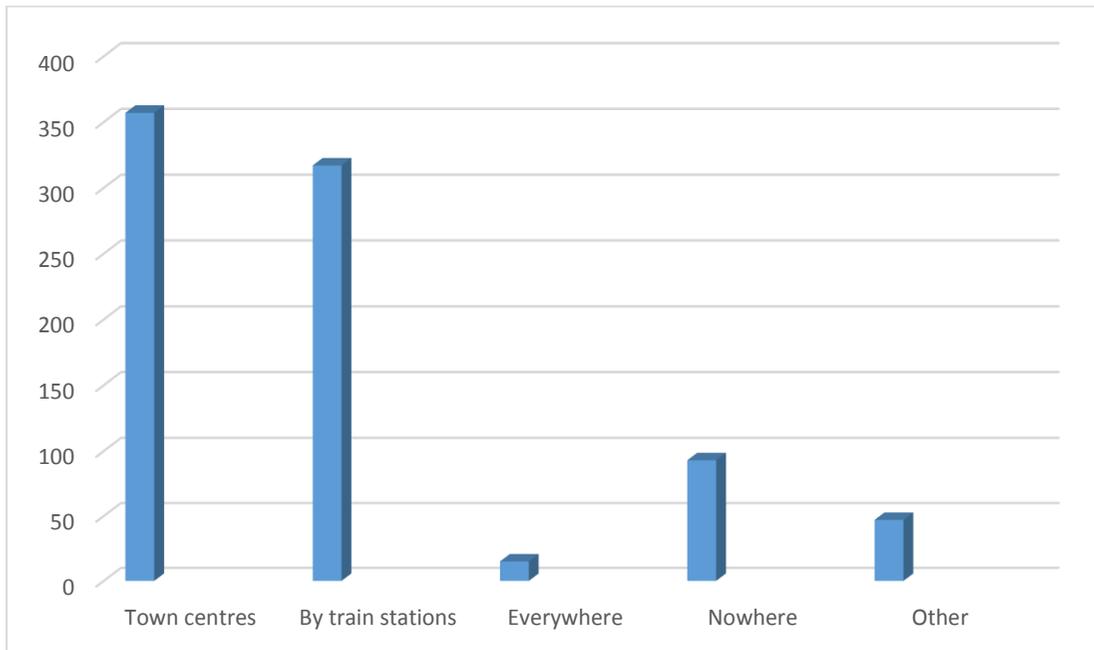
Question 6 – Would you support Option 4? This proposes a balanced approach where much of our housing need is met within the urban area but some is allocated to land currently within the Green Belt.

During the Consultation we received 515 responses to this Question. Of these responses, 50.6% (261) expressed **support** for this Option. Nevertheless, 49.4% (254) of responses were **opposed** to this approach.

Question 7: Where should higher density or taller buildings go?

This Question built upon earlier Issues & Options questions – specifically in relation to how urban intensification might contribute towards meeting the Borough’s objectively assessed housing need. In the context of our Local Plan, town centres are specifically Epsom, Ewell and Stoneleigh Broadway.

Figure 3: Where should higher density or taller buildings go?



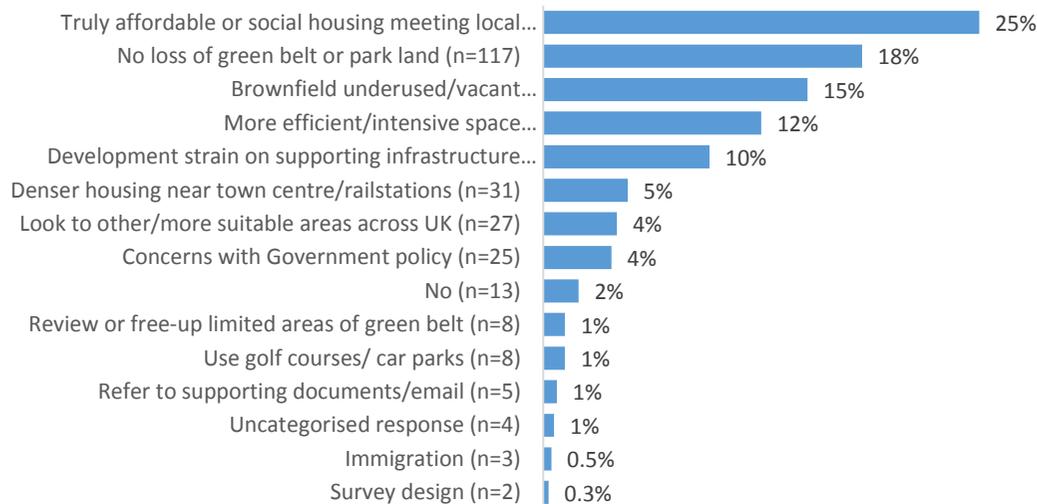
The highest number of responses were supportive of an approach to locate higher density developments and/ or taller buildings within town centres (357) and adjoining train stations (317). Only 15 responses supported an approach that would allow for higher density developments and taller buildings in all possible locations. In contrast 93 responses specifically stated that higher density developments and/ or taller buildings should not be considered in any location. Finally, 47 responses suggested that other locations be considered for this approach. It is noteworthy that many of the suggested alternatives were sites or types of site that are typically found within or adjacent to town centres – for example, “new housing built above public car parks”.

Question 8: Do you have an alternative suggestion to significantly boost housing and meet our housing need?

This Question sought alternative approaches in response to the challenge posed by the Borough’s objective assessed housing need. This Question provided respondents with an opportunity to identify a hitherto unknown “Option 5”.

During the consultation we received about 400 questionnaire responses to this question. The figure below provides a simplified breakdown of the responses to this question. This seeks to group the responses under simplified subject headings. It is not intended to be definitive.

Figure 4: Breakdown of responses to Question 8



For the purposes of this Paper, we have sought to provide a further insight into the literal responses made under the simplified subject headings identified in Figure 4. The Table below provides an overview of these literal responses.

Table 1: Examples of literal responses to Question 8

Simplified subject heading:	Examples:
Truly affordable or social housing meeting local needs	<ul style="list-style-type: none"> • Additional housing should prioritise local people in real housing need. • Additional housing only to meet local needs. • Any new housing should be truly affordable and meet local need. • Majority of new housing on any scale should be affordable. • The emphasis should be on affordable housing.
No loss of green belt or park land	<ul style="list-style-type: none"> • No loss of Green Belt which is performing its proper function. • Green belt preservation should be a priority otherwise the character and identity of the area will be destroyed. • Building on the Green Belt would undoubtedly be the thin edge of the wedge and would lead to extreme environmental damage. • I oppose any use of greenbelt as once it's gone it's gone for all future generations.
Brownfield underused/vacant offices/shops/buildings or land	<ul style="list-style-type: none"> • Properly evaluate brownfield sites first. • Empty office blocks that can be converted into housing. • Free up empty properties. • Interrogate disused and under used sites. • Several sites have been boarded up and remain eyesores.
More efficient/intensive space utilisation/backland/downsizing	<ul style="list-style-type: none"> • Maximising the use of land as it becomes available. • Encourage developers to buy up areas with large houses with big front and back gardens so a larger number of 2/3 bedroom houses can be built on the site. • Maximise residential provision above buildings utilised for other purposes (shops, community facilities, etc).

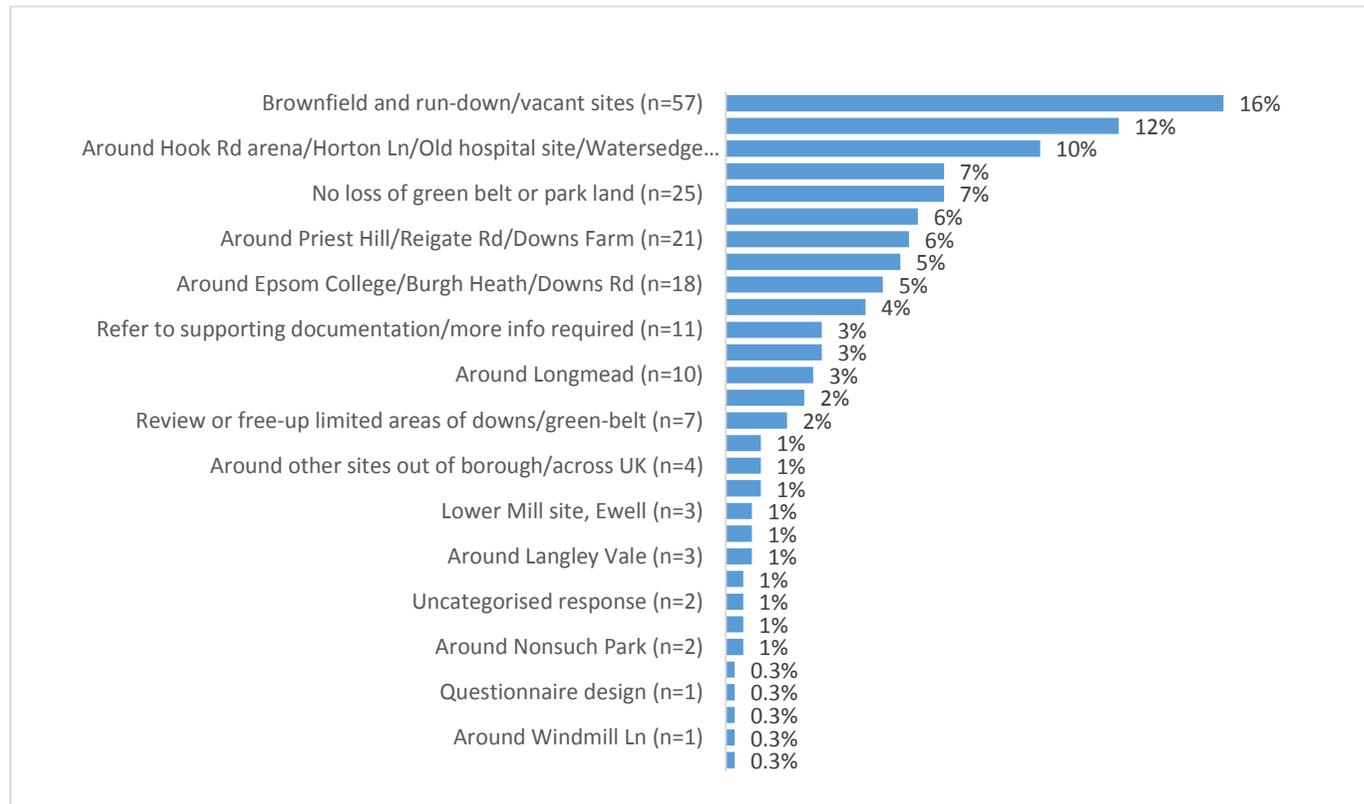
Simplified subject heading:	Examples:
	<ul style="list-style-type: none"> • Attracting older residents (who might be living alone in unsuitable buildings) to downsize to smaller, desirable, fit for purpose accommodation and therefore releasing large properties.
Development strain on supporting infrastructure	<ul style="list-style-type: none"> • The amount of homes being asked for is not realistic, our transport links, schools and hospitals are already stretch to the max. • Need to consider provision of other services, such as hospitals, schools, transport. • Epsom roads are absolutely full to bursting... GP surgeries are overrun with patients... Schools are over-subscribed.
Denser housing near town centre/rail stations	<ul style="list-style-type: none"> • Higher density housing closer to town centre. • I would however support some increasing of density in the urban area (particularly around good transport links). • Town centre and near station locations relax height restrictions on previously commercially developed land adjacent to railways.
Look to other/more suitable areas across UK	<ul style="list-style-type: none"> • Action should be taken to address the unsustainable population growth in the South East when other areas of the country are shrinking. • Promote the idea of building a new town with the appropriate infrastructure somewhere flat and accessible some 50 miles north of greater London. • Giving areas other than London and the South East a boost has got to be the right way to go. • There are other, more suitable spaces in the UK to build houses.
Concerns with Government policy	<ul style="list-style-type: none"> • The government housing policy is flawed. • Where is the option to push back on the Government regarding the ludicrously high targets set? • Is this not rather about a requirement imposed by Central Government in the context of a failed regional policy?
No	<ul style="list-style-type: none"> • The word “No” provided as an answer – as in “No, I am unable to identify an alternative approach”

Simplified subject heading:	Examples:
Review or free-up limited areas of green belt	<ul style="list-style-type: none"> • I believe there are areas labelled Green Belt which no longer apply to our changing world. • I agree that the greenbelt boundaries are no longer fit for purpose today. • Some minor adjustments to the Green Belt boundaries would be acceptable to accommodate some additional housing development. • Identify parts of green belt that are suitable without opening that as precedent to build too widely.
Use golf courses/ car parks	<ul style="list-style-type: none"> • Consider use of golf courses. • Car parks.
Refer to supporting documents/email	<ul style="list-style-type: none"> • A number of responses made reference to supplementary information submitted alongside the questionnaire responses.
Uncategorised response	<ul style="list-style-type: none"> • Review population growth and what impacts it. • Reducing housing need by supporting families with relationship help / counselling so fewer divorces, one-parent families etc. • No I do not trust the source of this information.
Migration	<ul style="list-style-type: none"> • A number of responses suggested state intervention to manage migration.
Survey design	<ul style="list-style-type: none"> • It is difficult to give yes or no answers to these complicated questions. • Survey questions seem odd - why 'adopt' for Option 1, 'follow' for Option 2, 'willing to support' for Option 3 and 'support' for Option 4?

Question 9: Would you like to promote any particular site or location for development?

During the consultation we received 298 responses to this question. The figure below provides an infographic overview of those responses that identified specific locations. It is noteworthy that a proportion of these responses (57) stated that **NO** the respondent was unable to identify a specific site or location for development.

Figure 5: Breakdown of responses to Question 9



It is further notable that some respondents went as far as to say they did not believe that there were any development opportunities available in the Borough; others specifically stating that sites currently located within the Green Belt should not be considered as future development opportunities. It is also noteworthy that some respondents identified specific postcode locations as possible sources of housing land supply. The Borough Council will investigate these opportunities and assess their potential as sources of supply.

For the purposes of this Paper, we have sought to provide a further insight into the literal responses made in respect of the sites identified in Figure 5. The Table below provides an overview of these literal responses.

Table 2: Examples of Literal Responses to Question 9

Sites:	Examples:
Brownfield and run-down/vacant sites	<ul style="list-style-type: none"> • The old gasworks next to the Rainbow Centre. • Old pub site on Ewell by pass/London Road junction Dairy site and Upper High Street. • All sites that have been derelict and blight the area. • Build on existing brown field sites.
No	<ul style="list-style-type: none"> • Respondent unable to identify any sites.
Around Hook Rd arena/Horton Ln/Old hospital site/Watersedge	<ul style="list-style-type: none"> • Hook Road Arena site. • Hospital Cluster where land available. • Area bounded by Horton Lane, Chantilly Road and Hook Road. • Areas at Watersedge.
Around Horton/West Hill/Hollywood Lodge/ Manor Green/ Wheeler's lane	<ul style="list-style-type: none"> • Some areas around Horton. • A few nearby areas to Hollywood Lodge also seem suitable for development. • Propose derelict Hollywood Lodge, near Christ Church Road as a suitable site for building houses. • The green land on West Hill adjacent to Wheeler's lane.

Sites:	Examples:
No loss of green belt or park land	<ul style="list-style-type: none"> • If we lose the Green Belt then Epsom loses its unique character. • I would like to see the nature of the borough protected for existing residents - the reason we moved here is its green and not over developed. • I do NOT want the public parks to go, nor any of the Green Belt. • No loss of Green Belt.
Target empty houses/offices/shops/business	<ul style="list-style-type: none"> • There are several unused office buildings around East Street that could be converted to flats. • Unused office space should be converted in to flats. • Review current businesses in town centres and target empty business locations. • The caretaker's site in Nonsuch Park by entrance that has been empty for some years could be suitable for three storey building.
Around Priest Hill/Reigate Rd/Downs Farm	<ul style="list-style-type: none"> • Priest Hill...development around its fringes, it is a large area that is seldom used and would give us a long term option for more housing. • Certain parts of Priest Hill. • Reigate Road site. • The Downs Farm site (College Road/Reigate Road).
Development strain on supporting infrastructure	<ul style="list-style-type: none"> • Local schools and GP surgeries etc are already under enormous pressure. • The local infrastructure must be able to cope - services, schools, roads, public transport. • Current developments have seriously impaired traffic conditions in the borough as the infrastructure is struggling to cope. • Serious account needs to be taken of Infrastructure, just to name a few, transportation..., Education, Medical & Health.
Around Epsom College/Burgh Heath/Downs Rd	<ul style="list-style-type: none"> • East Street Stables in Burgh Heath Road Low rise in Epsom College fields adjoining College Road. • South Hatch Stables Burgh Heath Road Epsom. • Land near Epsom College to the rear of Longdown Lane. • Promote land at Downs Road, Epsom for residential development.

Sites:	Examples:
Denser housing or near town centre/rail stations	<ul style="list-style-type: none"> • Epsom Town Centre. • Development immediately north of Epsom Station. Develop areas close to railway line in the area behind former the Staples. • More tall buildings near Ewell West Station.
Refer to supporting documentation/more info required	<ul style="list-style-type: none"> • Subject to further investigation at this stage. • Would need to research more to advice. • Refer to additional comments submitted by email.
Around Kiln Lane/East St/Stones/Farriers Rd	<ul style="list-style-type: none"> • East Street and Kiln Lane Area. • Retail sites at Kiln Lane. • Sites adjacent to Kiln Lane, Epsom where there is empty land at the back of the Wilsons site. • Behind Stones Road/Farriers/Kiln Lane?
Around Longmead	<ul style="list-style-type: none"> • Regenerate nicer areas around Longmead Estate. • Part of the Longmead should be redeveloped into nice new homes. • Sites eg Longmead Industrial Estate - a large area of low-rise buildings could accommodate the current industrial units along with significant new housing.
Investigate sites near/along railway line	<ul style="list-style-type: none"> • There is quite a gap between Ebbisham and the Wells along the railway for example and I do wonder if there could be some development here. • There is an area of scrubland, former allotment, by the railway line near Portland Place that is not used for recreation and is unkempt. Is it feasible to develop this? • Area at the Wells Estate on left as you go over the railway bridge. • Undeveloped land near railways.
Review or free-up limited areas of the Downs/Green Belt	<ul style="list-style-type: none"> • I think a limited amount of Green Belt land should be used if it is needed for social/council housing. • I suggest you nibble at the Green Belt all around so that every area has to have a few new houses to reduce the impact to communities. • If Green Belt needs to be sacrificed, it should be of low landscape quality.

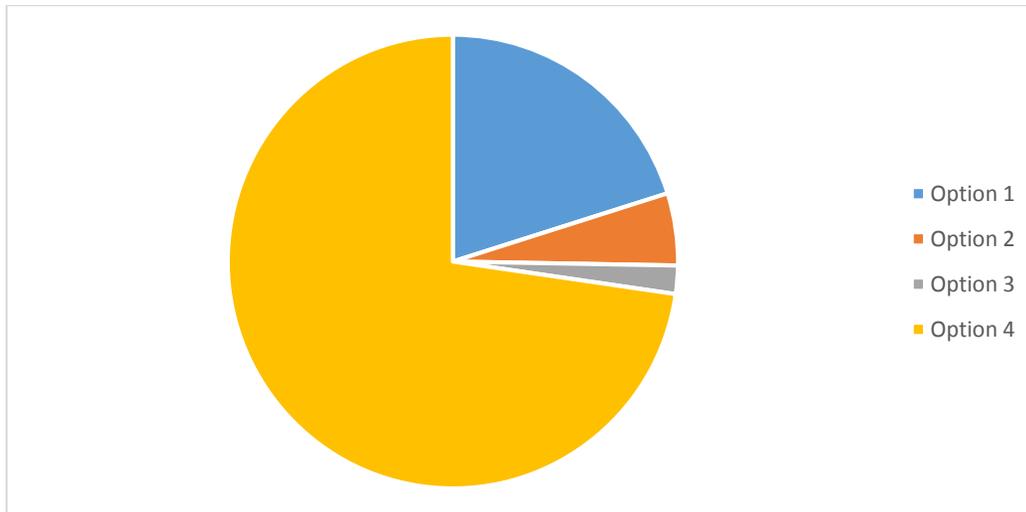
Sites:	Examples:
Around Old Malden Lane	<ul style="list-style-type: none"> Burnt out empty houses are not pleasant along Old Malden Lane. Old Malden Lane on the industrial site which is not well used and an eyesore.
Around other sites out of borough/across UK	<ul style="list-style-type: none"> Ashtead. Scotland - they have much more space in the highlands. Wales. They have more room in Wales for housing.
Around Dorking Rd	<ul style="list-style-type: none"> Use wooded land opposite old maternity wing of Epsom Hospital for housing.
Lower Mill site, Ewell	<ul style="list-style-type: none"> The Mill - previously occupied by Rawlinson & Hunter, would make a good site. The Lower Mill site (Ewell Village).
Around Banstead Rd	<ul style="list-style-type: none"> The area between Reigate Road and Banstead Road.
Around Langley Vale	<ul style="list-style-type: none"> There are two fields by Langley Bottom Farm, Langley Vale which, I believe, were not part of the sale to the Woodland Trust. Could these be used to extend Langley Vale village?
Concerns with Government policy	<ul style="list-style-type: none"> The housing target given to the Council by Central Government is not in my opinion based on any realistic assessment relating to this Borough and appears merely a figure plucked out of thin air. The numbers of need by both the Council; and uplifted by the Government bear no resemblance to what is sustainable.
Around Woodcote Park/ Wilmerhatch Lane/Headley Road	<ul style="list-style-type: none"> Derelict land along Wilmerhatch Lane/Headley Road running from Pleasure Pit Road to the stables on Headley Road.
Around Nonsuch Park	<ul style="list-style-type: none"> SM2 [postcode provided] SM3 [postcode provided]
Around Amberley Gardens	<ul style="list-style-type: none"> KT19 [postcode provided]
Questionnaire design	<ul style="list-style-type: none"> Q10 is an unfair question as none of the options are acceptable / viable and therefore there should be a 5th option allowing for this.
Around Ave Road	<ul style="list-style-type: none"> KT18 [postcode provided]
Around Windmill Lane	<ul style="list-style-type: none"> KT17 [postcode provided]
North Cheam	<ul style="list-style-type: none"> Site of old Tesco in North Cheam.

Question 10: Which Option, in your opinion, is the least bad?

From the outset we understood that not all residents and members of our local communities would agree with the objectives of national planning policy to significantly boost housing supply and meet our objectively assessed housing need. We understood that not everyone would welcome the four options identified within the Issues & Options Questionnaire. Nevertheless, we thought that it was important to ask the challenging question – which Option would you chose, if you had to, as the least bad?

During the consultation we received 449 responses to this Questionnaire question. The majority of responses identified Option 4 as the least bad option. Option 1, which responds to objectively assessed housing need through higher density development and taller buildings gained the second highest number of positive responses. The two options that are reliant upon a strategic Green Belt review and associated land release were predictably less popular with respondents – the majority of whom were local residents.

Figure 6: Breakdown of responses to Question 10



Appendix 1: All Responses to Question 8 – Alternative suggestions for significantly boosting housing and meeting need

Question 8 Response	Officer Comments
<p>We should look at any land which the Council owns, even small parks and see if they could be used. Some school land could be used for very limited small developments.</p>	<p>We are already pursuing this approach. Possible sites have been identified in the Borough wide SHLAA and will be taken forward as necessary.</p>
<p>Yes, in affordable council housing/housing association homes, I know of people in 3 bedroom places that live on their own. This should be addressed, find them suitable accommodation to suit their needs...do they really need 3 bedrooms with garden...the housing waiting list should have tighter regulations, why are people from other boroughs on our waiting list...</p>	<p>We have already reviewed our Housing Register so that it responds to those individuals or families who are in genuine need of social affordable housing.</p> <p>We will continue to work with our partners to respond to this issue.</p>
<p>Denser flats near rail stations, preferably Ewell, unless Epsom gets zone 6 status. The reality is extra people will need to go into London for work if there isn't room for business growth locally.</p>	<p>Suggestion noted. This suggestion equates to Option 1.</p>
<p>Industrial areas that exist in the area are predominantly low rise and not space effective. These should be made far more intensive - minimum 3-4 stories high so it frees up residential space. There isn't a register of brownfield sites at present so suggesting green belt needs to be used is absurd. This register needs to be completed so residents can respond appropriately to the options available. Over a quarter of 'green belt' land is used for agriculture so has minimal benefit to public, wildlife or the purposes green belt should have- if any green belt has to be used it should be this. Recently 91 houses were built on a 14 acre</p>	<p>Suggestion for higher density employment areas is noted. This equates to Option 1.</p> <p>The Borough Council has prepared a SHLAA as part of the Local Plan evidence base. This provides a robust assessment of available and deliverable brownfield sites. We have also prepared and published a Brownfield Land Register. Both of these demonstrate that there are insufficient available brownfield sites to meet our objectively assessed housing need.</p>

site - 'brown field land - this density is not sustainable - this plot of land should have had double this number to meet housing targets for a year, no more land needed. Mid rise flats are more affordable and help protect surrounding green areas.	
Convert plots of land unused	Suggestion noted.
Use the vacant office spaces on east street, remove run down buildings in and near the town centre and rebuild flats there	Suggestion noted – this equates to Option 1.
Higher density housing closer to town centre.	Suggestion noted – this equates to Option 1.
Less small shops like the co-op, Tesco, etc. The converted buildings would be better off as housing. We have too many of these small shops in the wrong places in the area. We also need the type of housing to be 85% social housing over the next 20yrs. They also need to be of better quality than those built in the last 10/20yrs.	<p>The Borough's local centres and shopping parades provide highly valued retail provision, which is accessible to the majority of the Borough's residents. Our adopted policy is resist proposals that degrade these centres. Nevertheless, they may provide opportunities for higher density development – above existing shops and commercial activities.</p> <p>Our SHMA demonstrates that the scale of our affordable housing need is 60% of all housing need. On that basis we would not be able to demonstrate need for greater provision.</p>
There are some green spaces in the new developments that are not quite attached to the common and these could be reviewed for additional housing. In the area near Priest Hill I believe further development is possible - it is near a train station. Whilst increasing the density and re-using vacant brownfield land and offices I would prefer us to keep the current height restriction and look at the open space. It is important to provide housing in the town to support the community and retain multiple generations of families. I would like to see some developments that could free up large	<p>Our evidence base does consider the potential sources of housing supply offered by under-utilised open spaces. This approach equates to Option 1.</p> <p>In order to accommodate the scale of housing need projected by our SHMA and the government's standard methodology within our existing urban area we will need to consider developments comprised of both significantly higher density housing and taller buildings. Our evidence suggests that for Option 1 to work we will need to consider developments of around 200 homes per ha.</p>

<p>houses by supplying new houses that met the need of people downsizing. So perhaps some developments of bungalows with small gardens and parking. Then the larger house might provide a plot of land for 2 modern houses.</p>	
<p>I BELIEVE THERE ARE AREAS LABELLED GREEN BELT WHICH NO LONGER APPLY TO OUR CHANGEING WORLD. WE LIVE FOR INSTANCE WITH FIELDS WHICH WHILST ONCE MAY HAVE HAD A PURPOSE MAY BE PRACTICAL TO LOOK AT.</p>	<p>Our Stage 1 Green Belt Study has already identified areas of Green Belt land that are poorly performing (against the purposes set out in national planning policy). Our Stage 2 Green Belt Study will provide a further assessment of these sites to determine whether they can be brought forward as sources of supply.</p>
<p>Some areas such as Watersedge and Longmead could be progressively redeveloped with the introduction of taller buildings, of better quality, to increase use of these areas. There should also be a focus on building smaller units for first time, and last time buyers, to meet the needs of these sectors. As they would be smaller 1-2 bedroom units, we can provide more dwellings on same space.</p>	<p>Suggestion noted – this equates to Option 1.</p>
<p>For those who are in a position to downsize in property, older residents 65+, should be offered tax incentives; reduction of stamp duty for those properties, under proposed tax incentives. These may offset costs to build houses to replace those being under-utilised. infrastructure is so important to support new developments. more residential housing for retirement couples, higher density allowances</p>	<p>Suggestion noted – this level of intervention is beyond the scope of the Local Plan, or indeed any mechanism available to the local planning authority. The government is not proposing this type of intervention – relief in stamp duty being limited to first time buyers.</p>
<p>Consider use of golf courses.</p>	<p>It is noted that all of the Borough’s golf courses are located within the Green Belt.</p>

<p>The solution created by Nescot has been positive in my opinion, so my question would be, before we take away green belt, or build higher, can we use any land that isn't currently being used for any specific purpose? Or at least any real useful purpose. Yes this may cost money to purchase the land, but it's better than taking away green belt that that there is no going back on later. Also, maybe we have to be tougher buildings that are empty. office blocks that can be converted into housing. There seems to be options before automatically going to greenbelt areas. Which, I may add, seems to be assumed is OK to be a very large focus of your consultation.</p>	<p>We are already pursuing this approach. Possible sites have been identified in the Borough wide SHLAA and will be taken forward as necessary.</p> <p>The Borough Council has prepared a SHLAA as part of the Local Plan evidence base. This provides a robust assessment of available and deliverable brownfield sites. We have also prepared and published a Brownfield Land Register. Both of these demonstrate that there are insufficient available brownfield sites to meet our objectively assessed housing need.</p>
<p>Considering the number of dwellings required, I think we must think about building flats. I know that there will be complaints about the lack of a garden but do we have the room?</p>	<p>Suggestion noted – this equates to Option 1.</p>
<p>no</p>	<p>Suggestion noted.</p>
<p>Option 4 appears to suggest that future housing needs may not be met so I don't support that, but I do think it's about utilising every potential option to the maximum so that the council delivers on the full projected housing need.</p>	<p>Comments noted.</p> <p>Our evidence demonstrates that it will be extremely challenging to meet all of our objectively assessed housing need. This is primarily because there is an insufficient supply of genuinely available and deliverable sources of housing land supply. Option 4 seeks to respond to this challenge by meeting as much of the need as sustainably possible. Seeking to maximise every source of housing land supply to its full unconstrained capacity may not prove a sustainable solution, and in our view does not constitute sound planning.</p>
<p>Review how other green spaces are used e.g. local parks and recreation grounds and if they are suitable for housing which could provide funds to</p>	<p>We are already pursuing this approach. Possible sites have been identified in the Borough wide SHLAA and will be taken forward as necessary.</p>

<p>upgrade the remaining green space. Epsom and Ewell has vast amounts of green space but it is difficult to see how housing demands can be met without using some of it. This need not necessarily be detrimental to the environment. Allotment sites should be a last resort and only if they are grossly underused since with more housing there will conceivably more need for allotments in the future.</p>	<p>It is noted that many formal public open spaces, such as playing pitches and allotments have additional layers of protection outside of the planning system. These may ultimately render such sites unavailable as possible sources of supply.</p>
<p>Convert the large amount of unoccupied office space Develop high quality retirement properties (not just flats!) for residents living in the borough who wish to downsize</p>	<p>While there are some vacant offices located in the Borough, and by their nature they are very visible within the townscape, the potential number of new homes that could be provided from this sources is relatively modest.</p> <p>Our evidence demonstrates that the need for more retirement properties is low. Indeed, our evidence suggests that a number of existing retirement developments are under-occupied, with vendors struggling to sell vacant units.</p>
<p>Additional housing should prioritise local people in real housing need. No loss of Green Belt which is performing its proper function.</p>	<p>Suggestion noted – this level of intervention is beyond the scope of the Local Plan, or indeed any mechanism available to the local planning authority. The government is not proposing to provide local planning authorities with the policy instruments that would be required to implement this suggestion.</p>
<p>Additional housing only to meet local needs. No loss of Green Belt that is properly functioning</p>	<p>Suggestion noted.</p>
<p>A focus on significantly improving train services to and from employment areas would reduce the pressure on 'surburban' London.</p>	<p>The proposed rail improvements being promoted under Cross Rail 2 would deliver the suggested improvements. We are actively working with the Cross Rail 2 promoters and will contribute to any future consultation and implementation of this major infrastructure scheme.</p>
<p>Using modern living options such as communal living, becoming popular in Central London, would allow young people (local university students and young workers) to live in attractive housing which would deliver high living densities.</p>	<p>Suggestion noted – this equates to Option 1.</p>

<p>The council should identify locations suited (visually and in terms of achievable infrastructure and amenities) to medium-rise development, and begin purchases to stitch together these medium-sized development areas to deliver the required housing units over the next 15-25 years. Run-down areas just outside town centres would be easiest. Some will partly encroach on existing areas of employment and retail, but such enterprises have changing spatial needs in the digital age. Developments should have mixed tenure, mixed housing types (low-rise, detached, apartments) and high-spec amenities operated and protected by residents' Trusts. Developers should include housing associations, larger and smaller private builders, and the Council itself (esp for sheltered housing) under the direction of an arms length Borough Development Corporation tasked with X habitations self-financed over its 30 years existence, but with no uncompensated "decanting". This is a significant undertaking that could and should be shared across neighbouring Boroughs.</p>	<p>Suggestion noted – this equates to Option 1.</p> <p>The Borough Council is exploring the potential establishment of property vehicle to deliver new housing. The success of such a solution is dependent upon government providing local authorities with the necessary tools, to finance the purchase and development of sites.</p>
<p>Too smaller a borough - infrastructure cannot cope as it is. Enough development has taken place. Any new should be just converting big old houses/offices into flats.</p>	<p>Comments noted. Nevertheless, national planning policy is challenging us to respond housing demand. We cannot simply say that the Borough is full and infrastructure cannot cope.</p> <p>While vacant and underused properties are a legitimate and valued source of housing land supply, it is highly unlikely that such sites will prove sufficient and reliable sources of supply.</p>
<p>Properly evaluate brownfield sites first.</p>	<p>We are already pursuing this approach. Possible sites have been identified in the Borough wide SHLAA and will be taken forward as necessary.</p>

As wonderful as allotments are, there are some that are no longer fertile and are unused.	<p>We are already pursuing this approach. Possible sites have been identified in the Borough wide SHLAA and will be taken forward as necessary.</p> <p>It is noted that many formal public open spaces, such as playing pitches and allotments have additional layers of protection outside of the planning system. These may ultimately render such sites unavailable as possible sources of supply.</p>
Car parks!	We are already pursuing this approach. Possible sites have been identified in the Borough wide SHLAA and will be taken forward as necessary.
Taller buildings could provide additional housing provided they are situated in suitable selected locations with minimal impact on the surrounding areas.	Comments noted – this suggestion equates to Option 1. In the right locations taller buildings may provide a sustainable source of housing land supply.
Free up empty properties, place an extra tax on owners who leave them empty	While empty properties are a legitimate source of housing land supply, it is highly unlikely that such sites will prove sufficient and reliable sources of supply. In many cases empty properties are only vacant for relatively short periods of time – for reasons that include refurbishment and resolution probate. The number of long term empty properties is relatively modest.
Develop homes with smaller gardens, reduce number of office buildings and encourage virtual offices Reduce number of shops, redevelop shops into houses and encourage online shopping	The Borough’s local centres and shopping parades provide highly valued retail provision, which is accessible to the majority of the Borough’s residents. Our adopted policy is resist proposals that degrade these centres. Nevertheless, they may provide opportunities for higher density development – above existing shops and commercial activities.
Empty office buildings	While there are some vacant offices located in the Borough, and by their nature they are very visible within the townscape, the potential number of new homes that could be provided from this sources is relatively modest.

Build (on stilts) on Upper High Street and Depot Road Car Parks, or incorporate multi-storey car park in plans.	We are already pursuing this approach. Possible sites have been identified in the Borough wide SHLAA and will be taken forward as necessary.
Improve transport connections to other areas where development could be supported.	The proposed rail improvements being promoted under Cross Rail 2 would deliver the suggested improvements. We are actively working with the Cross Rail 2 promoters and will contribute to any future consultation and implementation of this major infrastructure scheme.
Surrey	<p>The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms.</p> <p>Many neighbouring Surrey planning authorities face the same challenges that we have – namely, that they are heavily constrained by Primary Constraints and the Green Belt and that they have an insufficient supply of available and deliverable sources of housing land</p>
Conduct a review of the use of land currently being leased to large retail outlets and other commercial enterprises to establish if these sites are being used efficiently. Could some of these sites be compulsory purchased by the council if they are not being used efficiently? The large industrial site between East Street and Longmead Road in Epsom offers great potential for housing development.	<p>The Borough's employment sites and shopping areas are highly valued for their contribution in making the Borough a sustainable place to live, work and shop. Our adopted policy is resist proposals that degrade these areas. Nevertheless, they may provide opportunities for higher density development – possibly above existing shops and commercial activities.</p> <p>While the compulsory purchase of land appears an attractive solution to enabling housing delivery, there is a level of financial risk. The government has implied that it may review the compulsory purchase process – possibly simplifying it in order to reduce the level of risk to local authorities. If this happens it may provide a further mechanism to securing timely housing delivery.</p>
East St seems to have an increasing quantity of unused offices, providing continued scope for conversion to flats.	While there are some vacant offices located in the Borough, and by their nature they are very visible within the townscape, the potential

	number of new homes that could be provided from this sources is relatively modest.
It is not a simple matter of location. It is key to look at the urban/green belt context and intensify densities in specific areas without compromising on the quality of the living that Epsom can still offers. I don't think Epsom should be develop as much as Croydon for example.	Suggestion and comments noted – this equates to Option 1.
Suggest new developments should be high rises that incorporate parking, nurseries, nhs surgery, small offices, homes incorporating studio flats to 3 bedroom apartments to make it mixed use for businesses and residents. Might mean higher than 6 storeys but rather that than loose more green belt. This should be designed taking into account the increase in population density and the services they need being built in as part of the planning	Suggestion noted – this equates to Option 1.
I have put no to the above because it is difficult to give yes or no answers to these complicated questions. Please see my answer to question 9	Comment noted.
The 'housing need' should be re-assessed. This is a mainly media perceived necessity and not an actual market demand! If the actual need was there, there would be no houses for sale in estate agents and swarms of homeless people on the streets. This is not the case, therefore lack of access to affordable finance is the real problem.	<p>Comments noted. Nevertheless, national planning policy is challenging us to respond housing demand. We cannot simply say that the Borough is full and infrastructure cannot cope.</p> <p>National planning policy requires us to prepare our evidence in a very specific way – especially in terms of how we calculate objectively assessed housing need. This requirement is not a media invention. Failure to meet national planning policy may lead to government directly intervening in how we plan for the Borough's future needs. It is more likely to result in ad hoc planning, promoted by predatory developers via the planning appeal system.</p>

<p>Why build Retail space, it is no longer required - many of the existing shops have problems getting tenants. There is insufficient car parking to encourage retail or Office users already. You will need more allotment type space but 1, 2 and 3 bed-roomed flats will use up less space and be more affordable. 5 or 6 story blocks would be fine by me. There will need to be a lot more car parking spaces to go with such developments.</p>	<p>The Borough's local centres and shopping parades provide highly valued retail provision, which is accessible to the majority of the Borough's residents. Our adopted policy is resist proposals that degrade these centres. Nevertheless, they may provide opportunities for higher density development – above existing shops and commercial activities.</p>
<p>Taller buildings should be built wherever they can be without spoiling the area for anybody already living there. I am more worried about the infrastructure as the schools are already overcrowded, the hospitals are not managing the increasing population and the traffic, as anybody who lives here knows, is often at a standstill at certain times of the day. How will the infrastructure cope with an extra 20,000 people?</p>	<p>Comments noted – this equates to Option 1.</p> <p>The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>
<p>High density does not have to mean tower blocks! Flats tend to be cheaper and therefore more accessible for first time buyers/younger people. Where the density of population is going to increase it will be vital to maintain the integrity of green spaces and allotments for the well being of the community.</p>	<p>Comments noted – this equates to Option 1.</p> <p>The comments relating to the design of new development are welcomed. The Borough Council remains committed to securing high quality and inclusive urban design and townscapes from new development, which enhance the Borough's visual character and appearance.</p>
<p>You state that flats do not support 2 and 3 bedroom homes. This is completely false. In London Boroughs, 2 and 3 bedroom homes are often flats and apartments. The land taken up by homes could be a lot smaller. Many housing plots, especially those on corner plots, could support another house.</p>	<p>Comments noted – we agree that this may the opportunity to plan for new types of family-sized apartments or flats. This suggestion equates to Option1.</p>
<p>Compulsory purchase derelict/brownfield/industrial sites - e.g. old dairy site on Alexandra Road - what is happening with that?</p>	<p>While the compulsory purchase of land appears an attractive solution to enabling housing delivery, there is a level of financial risk. The government has implied that it may review the compulsory purchase</p>

	<p>process – possibly simplifying it in order to reduce the level of risk to local authorities. If this happens it may provide a further mechanism to securing timely housing delivery.</p> <p>The former dairy site is owned by a foodstore operator, who has expressly stated that they do not want to make the site available for housing.</p>
No	Comment noted.
<p>Build higher storeys above shops to accommodate flats. More efficient energy homes should be built. Also consideration for charging stations for all the electric cars that will be here by 2040 need to be provided for.</p>	<p>Comments noted – our existing Local Plan policies already allow a degree of flexibility in terms of the conversion of the upper floors above retail units to housing. Option 1 may provide further scope for higher intensity developments and possibly taller buildings in appropriate locations.</p> <p>Equally our existing policies already seek to secure good quality sustainable design from new developments.</p> <p>Or Local Plan and Parking Strategy already allows for the introduction of electric vehicle charging points. However, this is entirely dependent market demand. We anticipate that this will increase over the Local Plan period and that the market will rise to challenge of meeting demand.</p>
Build higher storey houses above shops.	Comments noted – our existing Local Plan policies already allow a degree of flexibility in terms of the conversion of the upper floors above retail units to housing.
Option 1 without reallocate open space but with Co-operation with our neighbours	Comment noted.
Encourage development of upper retail accommodation in parts of town centres where retail is	Comments noted – our existing Local Plan policies already allow a degree of flexibility in terms of the conversion of the upper floors above retail units to housing.

no longer in demand. Poss demolish some retail units and build flats in town centres.	
The already developed hospital sites around Epsom and Ewell have plenty of scope for additional housing without increasing the intensity too much. People move here because of the rural nature of the area. If that is lost then people will simply move away to more rural areas. This is already happening.	<p>Comments noted. Our evidence on potential sources of housing land supply already take account of remaining land located with the hospital cluster.</p> <p>We agree that the Borough's visual character and appearance is key component of what makes it place where people want to come and live and work. We are working hard to ensure that future growth enhances the Borough. We strongly believe that planning for growth must be qualitative – not simply an accounting exercise seeking to maximise the number of new homes.</p>
Releasing land held by developers over a number of years . Using the new Govt policy of building more council/social housing that is rent affordable for local people. Not selling off any social Housing association housing of any size in future . e.g stop right to buy locally .	<p>Comments noted. Unfortunately the proposed interventions are beyond the scope of the Local Plan and do not accord with current government thinking – indeed, the government are proposing to expand 'right to buy', which may have an adverse impact on our ability to meet affordable housing need in the future.</p>
Epsom town centre as a whole has drastically demised over the last 20 years. a significant injection of younger based first time buyer properties would lift the general feel of the area as well as encourage retail growth in businesses that are new, young and growing. The development has already started around the Ebbisham centre, so this should be carried over to other parts of the town. We cannot look to accommodate any further inflows from other areas, particularly any further inflows from inner London areas that have historically bought land in the area!	<p>Comments noted.</p> <p>We agree, the change in development typology, particularly towards apartments and flats will bring with a change in the Borough's demographic profile.</p> <p>Local planning authorities do not have the ability to control and micromanage housing markets to the extent proposed. In short, people seeking to purchase a new home are free to so without regard to administrative boundaries. It is perhaps unfortunate that the way we (as nation) plan for new housing is different from how individuals buy housing.</p>

<p>Survey questions seem odd - why 'adopt' for #1, 'follow' for #2, 'willing to support' for #3 and 'support' for #4?</p>	<p>Comments noted. We can assure respondents that there is no hidden meaning associated with the slightly different wording of the Questionnaire questions.</p>
<p>Surrey</p>	<p>The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms.</p> <p>Many neighbouring Surrey planning authorities face the same challenges that we have – namely, that they are heavily constrained by Primary Constraints and the Green Belt and that they have an insufficient supply of available and deliverable sources of housing land</p>
<p>Stop allowing so many immigrants to come to the area. Our island is full. Epsom is losing its original culture!!!</p>	<p>Comments noted. Housing demand is comprised of a number of factors, including resident population growth; change in household composition; internal migration; the economic climate/ the desire to invest in property and international migration. Recent studies have demonstrated that management of international migration will not by itself make a significant difference to housing demand.</p> <p>There is no evidence that the United Kingdom is full – indeed, evidence demonstrates that the majority of the nation’s land is un-developed.</p> <p>Our existing Local Plan policies seek to actively protect and enhance the Borough’s heritage and biodiversity assets. The Issues & Options do not propose changes to any this approach.</p>
<p>My guess is we need more affordable housing, but we live in an expensive area where people can afford to pay a premium for more space. Until we stop catering to rich families who want large houses with big gardens next door to the common, we will always have a housing shortage.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our ability to proscribe how much new housing is affordable is constrained by national planning policy.</p>

Use RAC/Epsom College (see my previous reply).	Both the RAC and Epsom College are located within high perform areas of our Green Belt. We would need to demonstrate exceptional circumstances to justify their release for development.
Improve public transport links. Encourage job creation in the North of England. Oblige developers to provide 80% of all new housing as affordable housing association social rented housing, mostly 2 or 3 bedroom semi-detached houses.	Comments noted. The nature and scale of these interventions are beyond the scope of our Local Plan. While the government has indicated that they are considering some of the suggested measures they stop short of a “national plan” to address the national housing crisis.
In any plans to develop housing needs the following should be considered. 1. There is a need for more larger housing 3,4 bedroomed properties and so should not be restricted to 1 and 2 bedrooms 2. More shared ownership schemes 3. Review parking around Epsom (not just introduce parking charges or more restrictions). Ashley Centre is not widely used for shopping and I am aware of families travelling to Sutton, Kingston, Croydon as there is more choice for the same parking charge or alternatively Bluewater or Lakeside for free parking all day. For the town's economy to be healthy and businesses to succeed, we need people to shop locally. The recent restrictions to parking has created more difficulty for residents. One only has to see streets around the town on a Saturday to see them literally empty where residents used to previously park and do their shopping. 3. If building flats, ensure a car park is pre-requisite. Obviously it is fair enough to penalise residents with more than one car in the household. 4. Epsom has recently featured within the top 10 towns for living in England? For this to be maintained any development should bear this in mind and take a broader view to support its residents not make daily life and commuting difficult. 5. If	<p>Comments noted. Our evidence, specifically the SHMA provides a robust breakdown of the different housing needs across the Borough. This includes the demand for different sizes of accommodation.</p> <p>We are fully aware of the issues relating to parking provision. This is reflected in our existing Car parking Standards policies, our supplementary planning guidance and our Corporate Parking Strategy. We will take account of changes in travel habits and car ownership and use, and respond accordingly.</p> <p>The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>

<p>considering building more homes around te twin centre, would it also be better to create out of town shopping centres at the same time (similar to Leicester - Fosse Park). That way it helps residents with parking fees, helps reduce congestion around town.</p>	
<p>Surrey</p>	<p>The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms.</p> <p>Many neighbouring Surrey planning authorities face the same challenges that we have – namely, that they are heavily constrained by Primary Constraints and the Green Belt and that they have an insufficient supply of available and deliverable sources of housing land.</p>
<p>Encourage older people to downsize</p>	<p>Comment noted. Encouraging older people with large family homes to downsize may form part of a solution to the national housing crisis. However, it is unfortunately unlikely by itself to help meet the demand for housing being projected for the Borough.</p> <p>It is noteworthy that the economics of downsizing are not as clear-cut as they may appear. Evidence shows that the cost of elderly person accommodation can, over their remaining lifetime, outstrip the sale of value of the family home used to finance that accommodation. In such adverse market conditions, the financial incentive for elderly people to downsize is non-existent.</p>

<p>People should move to the city.</p>	<p>Comment noted.</p>
<p>I completely disagree with altering the boundaries of the Green Belt. It is imperative that we keep urban development under control within certain boundaries, or we run the risk of losing open spaces of great importance to the environment. Reading this plan, I get the impression that the council is simply trying to fill a quota the government has 'suggested' for new houses. This document has suggested plans for the development of new houses, but has not addressed the issues that go hand in hand with increasing the population size of an area. Naturally more houses mean more people, and people need hospitals, schools, jobs, shops, community spaces, parks and playgrounds. If we barely have the space for more houses, how can anyone expect to provide the necessary resources for these new neighbors? I'm seriously concerned that we are heading towards becoming a 'dormitory' town. Yes there is some space left for more housing, but this shouldn't be to the detriment of the residents already in place. We should build the houses that can realistically fit in the borough, without focusing too much on figures. If we really do run out of space in the area, then what can the government actually do about it other than stamp their foot and throw a wobbly?! Lets focus less on statistics and more on welfare and quality of life. There are other, more suitable spaces in the UK to build houses.</p>	<p>Comments noted. Nevertheless, national planning policy is challenging us to respond housing demand. We cannot simply say that the Borough is full and infrastructure cannot cope.</p> <p>National planning policy requires us to prepare our evidence in a very specific way – especially in terms of how we calculate objectively assessed housing need. This requirement is not a media invention. Failure to meet national planning policy may lead to government directly intervening in how we plan for the Borough's future needs. It is more likely to result in ad hoc planning, promoted by predatory developers via the planning appeal system.</p> <p>The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p> <p>We share your concerns, particularly in relation to the apparent obsession to secure housing numbers, as opposed to planning for sustainable growth. Nevertheless. We have to work within the planning system that the government is creating.</p>
<p>Stop so many people coming into our country.</p>	<p>Comments noted. Housing demand is comprised of a number of factors, including resident population growth; change in household composition; internal migration; the economic climate/ the desire to invest in property and international migration. Recent studies have</p>

	demonstrated that management of international migration will not by itself make a significant difference to housing demand.
Build more council homes, do not allow larger than 4 bed homes, no detached properties. All properties must have parking	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
No	Comments noted.
Surrey	The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms. Many neighbouring Surrey planning authorities face the same challenges that we have – namely, that they are heavily constrained by Primary Constraints and the Green Belt and that they have an insufficient supply of available and deliverable sources of housing land.
Some industrial / retail sites may lend themselves to mixed residential use such as the flats over Lidl and Aldi stores.	Comments noted – our existing Local Plan policies already allow a degree of flexibility in terms of the conversion of the upper floors above retail units to housing.
any new housing should be truly affordable and meet local needs	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Working with Social Services to facilitate and encourage older people living alone in 3+ bedroomed houses to re-locate to smaller properties / sheltered accommodation Utilising the rooms above shops - sometimes used for storage - to be converted to flats, unless they are used for offices Some blocks of	Suggestions noted. Our existing policies provide the opportunity for vacant and surplus upper floors, above shops and other commercial units, to come forward for residential use. This policy has been successful particularly in parts of Epsom Town centre. However, it must be noted that this source of supply is finite.

garages are not usable as they are too small for modern cars, these could be demolished and housing provided - but need sufficient parking	Equally, existing Local Plan policies also provide the opportunity for other vacant and redundant uses, including domestic garages, to be redeveloped for housing.
Compulsory purchase of suitable sites, including golf courses. Encourage increase in height where building less than three stories currently. Change local plan to restrict low density high price development. Enforce social housing quotas. Planning permission to have caveats and conditions that encourage immediate or expedient development.	Comments noted. While some of these suggestions are valid, they are beyond the scope of the Local Plan and would require intervention by central government. To date, government had not indicated that they are prepared to undertake such measures.
reducing housing need by supporting families with relationship help / counselling so fewer divorces, one-parent families etc	Comments noted. While these are valid suggestions, they are beyond the scope of the Local Plan.
Any new housing should be TRULY affordable and meet LOCAL need	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Road traffic, pollution control, better public transport and provision of schools/health care have to be developed and invested in at the same pace. Majority of new housing on any scale should be affordable, no second homes for rental. Green belt preservation should be a priority otherwise the character and identity of the area will be destroyed please no more taller buildings like the station apartments which are an eyesore, buildings should be sympathetic to the area.	Comments on infrastructure noted - the Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.
First improve the existing inadequate infrastructure and services - road repairs, NHS capacity, school capacity	The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.

Any new housing should be affordable where possible to meet purely LOCAL needs but there should be a mix with commercial developments. Loss of green belt land must be avoided at all cost but this can only be done by managing demand and not simply building in a knee-jerk reaction to otherwise manageable issues.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
"Our housing need"? That's misleading. 80% would probably be occupied by people who would be "new" to the Borough. Is this not rather about a requirement imposed by Central Government in the context of a failed regional policy?	Comments noted. There is no available planning policy mechanism that allows local planning authorities to intervene or manage who purchases new homes. That level of intervention would be contrary to our free market society. Therefore it is entirely correct that any assessment of housing demand considers 'need' generated from beyond the Borough's administrative boundary.
Any new housing should be truly affordable and meet local needs. Please do not adjust the Green Belt as it performs its function to limit encroachment of the city which the government has done little to prevent (by trying to attract business to other areas). The increased urbanisation and high prices of London is driving business to look to invest and setup offices elsewhere in the UK and it is now "on trend" for people to move away from London to in order to buy - which only contributes to areas other than London.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Interrogate disused and under used sites and use CPO. The gas holder site springs to mind but this will need a clean up operation.	Comment noted. Our evidence, particularly the SHLAA does provide an in-depth assessment of potential sources of housing land supply that are available and deliverable within the existing urban area.
Borrow to build Council houses	Suggestion noted. We are considering the creation of development vehicle that would enable this suggestion to be pursued.
No loss of the Green Belt	Comment noted.

<p>There are a lot of existing houses with very big gardens. Approach owners to see if land can be bought to redevelop. Many are old people who cannot keep large gardens. Also approach house owners who live alone in larger houses to see about possibility of converting to two maisonettes and selling. Could some three storey flats be built in residential areas without looking too out of place? Relax planning laws further to encourage larger families to live together and homing of elderly with their relatives in grannie flats etc this freeing up other houses. Financial incentives for elderly to down-size/live with relatives (tax breaks etc)</p>	<p>Comment noted. Our evidence, particularly the SHLAA does provide an in-depth assessment of potential sources of housing land supply that are available and deliverable within the existing urban area. However, it should be noted that the possible yield from backland sites such as this will be relatively limited. Our evidence of delivery demonstrates that such sources are not reliable forms of supply.</p> <p>The other suggestions, whilst valid are beyond the scope of the Local Plan and would require significant intervention from government, who have not indicated that they are prepared to take such measures.</p>
<p>Any new housing should be truly affordable and meet local needs. There should be no loss to the Green Belt.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>Sites that have existing buildings demolished and just surrounded by hoardings e.g. Old Iceland site, Organ Inn site, other disused brownfield sites, revamping buildings that have been decommissioned e.g. Old police station.</p>	<p>Suggestions noted – these are valid potential sources of housing land supply – and indeed, some are already being considered for allocation.</p>
<p>I believe that there is potential in so called "brownfield" sites within the Borough . Several sites have been boarded up and remain eyesores e.g the old Iceland site . There is also limited potential in reusing or converting some buildings for housing e.g. the old Police station. Any new housing must be truly "affordable " and meet local needs.</p>	<p>Comment noted. Our evidence, particularly the SHLAA does provide an in-depth assessment of potential sources of housing land supply that are available and deliverable within the existing urban area.</p> <p>Suggestions noted – these are valid potential sources of housing land supply – and indeed, some are already being considered for allocation.</p> <p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been</p>

	to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any new housing should be truly affordable and meet local needs. There should be no loss of green belt land	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Use of brownfield and ex-industrial sites within the borough as much as possible. Encourage developers to buy up areas with large houses with big front and back gardens so a larger number of 2/3 bedroom houses can be built on the site. There are many older people who have houses that are too big for them to manage so moving to a smaller property would help them and the housing needs of the borough. This sort of happens in some areas but one big house is just replaced by two big houses. Any new housing should be truly affordable and meet local needs. There should be no loss to the existing green belt.	<p>Comment noted. Our evidence, particularly the SHLAA does provide an in-depth assessment of potential sources of housing land supply that are available and deliverable within the existing urban area. However, it should be noted that the possible yield from backland sites such as this will be relatively limited. Our evidence of delivery demonstrates that such sources are not reliable forms of supply.</p> <p>The other suggestions, whilst valid are beyond the scope of the Local Plan and would require significant intervention from government, who have not indicated that they are prepared to take such measures.</p>
New housing should be affordable to meet local needs and NOT impinge on greenbelt. Greater use needs to be made of brown belt areas.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Firstly, there should be no loss to the green belt- any new development should be affordable and meet local needs.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Review of new proposed housing developments to limit large Executive houses e.g. 4-5 bedrooms and instead build more smaller e.g. 2-3 bedroom dwellings to	Comments noted. Our evidence base, specifically the SHMA, provides a robust assessment of the different areas of housing need found across the Borough – including demand for different sizes of home.

<p>achieve high density whilst aiming to build aesthetically attractive buildings that fit the locality like the Ewell Sainsbury's site instead of the ugly Epsom station development. Good and aesthetic design fitting in with local vernacular can make high density building socially attractive.</p>	<p>We agree that high quality inclusive design is a key element in securing sustainable development. Our existing design policies are beginning to be successful in securing good design from new developments.</p>
<p>The sites that has been sold to Aldi and Lidl is desperately disappointing, especially in view that the council are looking at housing needs. These areas should have been sold for housing use only. We are surrounded by a huge choice of supermarkets yet here are 2 ideal spots that should have been targeted for housing being sold for 2 more large shops. What a tragic loss of opportunity and here we are looking at our beloved, beautiful green belt land which I'm sure Lidl and Aldi could not give a damn about.</p>	<p>Comments noted. The two sites mentioned in this responses were both in private ownership prior to being bought by food operators. In our free-market economy the Borough Council has no control over who purchases private land. In the case of the Upper High Street site, the recent planning permission is for a mixed use scheme comprised of both housing and a new food store. We believe that this scheme makes efficient use of the site, The former Dairy Crest site, whilst owned by a food store operator does not have planning permission – so it is still possible that it come forward as a Local Plan housing site allocation.</p>
<p>Build above all the car parks in the centre of Epsom, combine the police ambulance and fire stations and build on the 2 sites not retained. Also force building above all car parks such as Sainsbury's site.</p>	<p>Suggestion noted – this equates to Option 1.</p>
<p>It was mentioned that high rise buildings would not really meet the need for 2 and 3 bed homes but perhaps duplex (split level) apartments can be considered.</p>	<p>Suggestion noted – we are exploring new development typologies that could provide family sized accommodation in an apartment or flat format.</p>

<p>Any new housing should be truly affordable and meet local needs. We should not lose any of our Green Belt land.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>Sites that are currently unused should be compulsory purchased and used for building homes. Roads and transport links should also be improved, also schools and medical facilities to accommodate the extra people.</p>	<p>Suggestion noted. Current compulsory purchase powers are relatively restricted and contain an element of risk to the Borough Council. Changes in these powers would be necessary to ensure that such interventions would be successful.</p> <p>The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>
<p>Maximise residential provision above buildings utilised for other purposes (shops, community facilities, etc).</p>	<p>Suggestion noted – our existing Local Plan policies allow this to where it is possible and appropriate.</p>

This sadly doesn't seem like much of a consultation for the public. Where is the option to push back on the Government regarding the ludicrously high targets set? Which other Borough has had huge hospital sites to build on in the last 20 years? Surely we have really done our bit for housing over the last few years. I absolutely respect that we have to build new homes, however, the figures proposed seem absolutely ludicrous. Epsom used to be a lovely Market Town and sadly it's becoming like a London Borough now which is not what people signed up for when they bought their properties and put down roots here. Epsom has always been so special because it offers the best of both worlds. Open space and good links into London. If we lose more Greenbelt Land it really will be to the detriment of the Borough. I am very sad to see what is happening to a place I love and have always called home. The place has changed so much and not for the better, sadly. I would like to have some information on how the infrastructure would be improved to meet these housing needs as well? Genuinely Malden Rushett couldn't cope with more housing. No one would ever get out of Epsom in the morning! There would need to be a new route to the M25. Will there be new Schools? More GP surgeries? And what about the hospital that is already under threat? I beg that Horton Country Park and Epsom Common remain untouched. My family use both these places weekly and my kids absolutely love it there as do so many people. They are really beautiful, special places.

Comments noted. Nevertheless, national planning policy is challenging us to respond housing demand. We cannot simply say that the Borough is full and infrastructure cannot cope.

National planning policy requires us to prepare our evidence in a very specific way – especially in terms of how we calculate objectively assessed housing need. This requirement is not a media invention. Failure to meet national planning policy may lead to government directly intervening in how we plan for the Borough's future needs. It is more likely to result in ad hoc planning, promoted by predatory developers via the planning appeal system.

The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.

We share your concerns, particularly in relation to the apparent obsession to secure housing numbers, as opposed to planning for sustainable growth. Nevertheless. We have to work within the planning system that the government is creating.

Any new housing needs to be truly affordable and meet local needs. We need affordable starter homes for younger workers in this area. There is a danger that new developments will just provide cheaper homes for those wanting to move from more expensive London properties.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any new housing should be truly affordable and meet local needs. No to loss of green belt.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
New Housing should be affordable , meet local needs and not swamp already stretched community and medical services	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Use identified limited space for well designed smaller dwellings. How can we stop the building of larger detached homes on such limited space?	Suggestion noted – this equates to Option 1.
Housing should be truly affordable and met local needs BUT NOT AT THE LOSS OF GREEN BELT	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any new housing should be truly affordable and meet local needs	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
New housing should be truly affordable and meet local needs.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been

	<p>to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>There are many vacant/derelict non-residential ie. commercial spaces that should be converted. There should be a halt to new apartments being built above 450K -this is not affordable starter homes. Also, there should be compulsory purchase of some railway land as this is often neglected. Any new housing should be truly affordable and meet local needs. There should be NO loss of the Green Belt.</p>	<p>Suggestion noted. Our existing Local Plan policies provide opportunities for genuinely available vacant and redundant non-residential uses to come forward for redevelopment as residential accommodation. These policies have been successful to date.</p> <p>The government has initiated a programme that would allow surplus public land to come forward for redevelopment as residential accommodation. This may result in surplus railway land coming forward.</p> <p>Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>The government housing policy is flawed; it should concentrate on building more self-supporting new towns to avoid over-congesting and permanently changing the character of our existing towns and cities. It all amounts to lowering the quality of life for everyone. I feel it unacceptable that anyone should have to live in a 'tall' building (taller than 4 storeys) because of the fire risk, having witnessed a tower block tower fire abroad, and the obvious Grenfell Tower fire reason. I don't think anyone should have to live like this.</p>	<p>Comments noted – we have some sympathy with the views expressed. Our recent comments to recent government consultations (on national planning policy) reflect our robust views on this matter.</p> <p>In respect of tall buildings, evidence from the housing market demonstrates that there is demand for taller buildings – both from the development industry itself (albeit not universally) and from property purchases. Our national planning system is rooted in our free market society and the type of intervention proposed is contrary to that ideology. Our existing national space standards and building regulations seek to actively ensure that all people are provided with enough space to live safely and securely. The Borough Council remains committed to this approach.</p>

<p>Put high rise flats in and next to the new housing that is on the old hospital cluster, and where empty office blocks are now.</p>	<p>Suggestion noted – this equates to Option 1.</p>
<p>Utilize vacant office space through revised use of sites. Demolish empty retail sites and build flats/maisonettes, review empty space above retail units and encourage conversion to flats. Review all redundant Brown field sites, enforce legally the sites to be reused for home building</p>	<p>Suggestions noted. Our existing policies provide opportunities for the redevelopment of vacant and redundant non-residential uses to come forward for redevelopment as housing subject to a range of criteria being met. This policy approach has been successful.</p> <p>Our evidence, specifically the SHLAA, provides a robust assessment of the potential sources of housing land supply that are available and deliverable within the existing urban area.</p>
<p>any new housing should be truly affordable and meet local needs. No to the loss of Green Belt</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>No, if a borough is full as it clearly is on map provided, that means its full. we can't just move boundaries on a map as if they are just lines on a map. There are larger implications that affect lives in the area. I am not allowed by law to move my boundaries on my land, same applies. Any new housing should be truly affordable and meet local needs. Under know circumstances should green belt land be used to build on.</p>	<p>Comments noted.</p> <p>Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>Have less immigrants and then there would be less need for more housing.</p>	<p>Comments noted. Housing demand is comprised of a number of factors, including resident population growth; change in household composition; internal migration; the economic climate/ the desire to invest in property and international migration. Recent studies have demonstrated that management of international migration will not by itself make a significant difference to housing demand.</p>

No, I don't. Don't ruin our lovely borough. You cannot concrete over the countryside just for extra housing. If the borough is full, then it is full!	Comments noted.
No reduction of green belt and any new houses to be meet local needs and be affordable	Comments noted.
Any new housing should be truly affordable and meet local needs.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any new housing should be truly affordable and meet local needs without loss of Green Belt.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
I think there is a role for clusters of high density or tall housing in key areas close to good transport links, either road or rail, similar to the strategy in London. There are areas of the greenbelt that are of poor quality and should be developed. Epsom is in a position to be able to provide good quality housing not far from good transport links and this should be seen as an opportunity to grow in a constructive way. I agree that the greenbelt boundaries are no longer fit for purpose today.	Suggestion noted – this equates to Option 1.
Any new homes should be truly affordable and meet local needs. Green Belt land should NOT be used under any circumstances	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
I think the key is to build high density homes around train stations. This is now basically a London	Suggestion noted – this equates to Option 1.

<p>commuter town, not a village, yet it still has far lower density than Kingston or Sutton. It needs flats and three story family homes, and building more of these near stations (instead of in the middle of nowhere to the west) will minimise the traffic burden on Epsom's inadequate roads. Use brownfield where possible and Epsom's beautiful parks must be kept, but build on the golf courses and random bits of field (even if in the green belt).</p>	
<p>Apart from further backland development, although this idea has already been milked by developers.</p>	<p>Suggestion noted – this equates to Option 1.</p>
<p>Why stop at ten stories high, make it 25 and ensure housing needs fully met</p>	<p>Suggestion noted.</p>
<p>While I don't wish to impact Epsom Common and understand the green belt maintains a gap between urban areas, the higher than usual distance between Epsom and Ashted stations would allow a new station in between, i.e. at Wells Road, which could support a new suburban centre with high density housing growth in the immediate surrounds, e.g. by increasing density in the existing nearby urban areas and releasing immediately adjacent green belt. I can't say if I support this without seeing how it might work, but think it's worth exploring.</p>	<p>Suggestion noted. A proposal of this nature could only come forward through as an outcome from a strategic Green Belt Review – as such a proposal would require the release of land currently designated as Green Belt. Epsom Common is also almost entirely designated as a SSSI, which is a Primary Constraint. As such the opportunities for it having potential as a source of housing land supply are limited.</p>
<p>Any new housing should be truly affordable and meet local needs.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>There should be financial penalties levied on non UK buyers in the Borough. A substantial proportion of new build should be affordable.</p>	<p>Comment noted. The proposed intervention is beyond the scope what the Local Plan can achieve and would require the introduction of primary legislation. While there is undoubtedly interest from foreign</p>

	investors in the British housing market (particularly in central London), there is no evidence that intervention to manage such interest would have an impact upon demand. Our own evidence demonstrates that the overwhelming demand is for affordable housing for existing residents.
No	Comment noted.
Any new housing should be truly affordable and meet local needs I say no to the loss of green belt Affordable should mean to new buyers starting off and not to those who can afford the inflated prices	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Anny new housing should be truly affordable and meet local need. I say NO to the loss of Green Belt	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Surrey	<p>The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms.</p> <p>Many neighbouring Surrey planning authorities face the same challenges that we have – namely, that they are heavily constrained by Primary Constraints and the Green Belt and that they have an insufficient supply of available and deliverable sources of housing land.</p>
Development does not need to be a negative thing we should avoid or manage reluctantly (Q10 says it all), but if the only option(s) on the table are squeezing limited development in around the edges while chipping off the green belt that gives this area its character, it's hard to think of it as a positive opportunity to create the kind of spaces our kids will	<p>Comments noted. We understand that new housing can bring many benefits to the Borough.</p> <p>The suggestion of developing a new settlement is valid in principle. However, the opportunities for such an approach in the Borough are limited. The issue of unconstrained land availability is not entirely unique to the Borough. Our neighbours face similar issues. For</p>

want to live in when they're grown up. The problem is not going away and I think it needs some radical thought - there's no point kicking it into the long grass. I'm surprised there is no suggestion of meeting targets by joining with neighbouring authorities and investigating the possibility of creating a new Garden Village somewhere like Malden Rushett - accessing Central Government funds for infrastructure and establishing statutory corporations with the power to co-ordinate major infrastructure projects. Look at the established models of Welwyn Garden City - it actually generates a profit each year that is reinvested back in additional social services for residents. Ebbsfleet is coming on board too. This would have to be alongside proactive discussions with central Government about not effectively being penalised by planning presumptions while the scheme is planned. The problem with the options laid out are that they are leading respondents down the line to rubber stamp what looks like a sensible middle ground but is actually both a dramatic erosion of greenbelt for developer-led schemes (which the BC will have to rubber stamp itself as clearly it will miss the housing "targets" and fall foul of the presumption for development) alongside what is most likely to be the piecemeal creation of high-density Sutton-style BTR schemes (which seem attractive as they tick the affordable box but are actually an economically illiterate means of sustaining unaffordable housing market prices in the area while driving up the housing benefit bill). The future looks incoherent and cramped. And all of this without a joined up approach to infrastructure planning,

example, while Mole Valley is predominantly rural in nature, almost all of its land is either subject to Primary Constraints (such as SSSIs or AONB) or Green Belt.

The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms.

We agree, we do have to take control and manage this issue but our ability to intervene on key issues such as the scale of housing demand and affordability are restricted by government policy; within which we have to work.

<p>highways or school placement. The frustration of the BC itself is palpable but the frustration of residents will, ultimately, be even greater. If there was ever a time that we needed the BC to lead the way on setting the tone for the next 15 years of borough development, it's now.</p>	
<p>No</p>	<p>Comment noted.</p>
<p>Charge higher council tax on properties empty over a certain time. Ensure that social housing is part of each development.</p>	<p>Suggestion noted. However, it should be noted that our evidence demonstrates that only a small number of vacant residential properties stay empty for a long period of time. The reasons behind long term vacant dwellings being empty are not always easily addressed and charging a higher council tax may not provide the right incentive in all cases.</p> <p>Our existing policy is to seek to seek affordable housing from developments comprised of five or more. We continue to seek this level of contribution where it is appropriate and does not endanger viability.</p>
<p>Developments need to meet local needs. Some suggestions: Hook Road Arena, upper high street, Epsom downs station area, above shops, brownfield sites. no loss of greenbelt land as important to maintain Epsom's heritage and character. Development should be contingent on proper infrastructure. The borough is already overstretched in terms roads, hospital, gps, schools, etc. Central government has a big role to play with policy making which could ease the number of houses required across the south east. This could be by encouraging job creation outside london by improving infrastructure and providing incentives to employers outside the south east.</p>	<p>Suggestions noted.</p> <p>The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p> <p>The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms.</p>

Any new housing should be truly affordable and meet local needs. No loss to the Green Belt.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
It should be made sure that new housing should be affordable not to profit developers!! I oppose any use of greenbelt as once its gone its gone for all future generations.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any new housing should be truly affordable and meet local needs.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Building dwellings over existing Car Parks. It has been estimated that in central urban areas that some 60% of land is devoted to car parking which for many times of the day is a sterile use of valuable land. Dwellings provided by the Council over Council car parks would provide the required level of affordable housing which developers in Options 2-4 are very reluctant to provide.	Suggestion noted – this equates to Option 1.
On land that was previously retail or commercial - but we also need to ensure we provide sufficient services such as schools, doctors surgeries, green spaces etc.	<p>Suggestions noted. Our existing policies provide opportunities for the redevelopment of vacant and redundant non-residential uses to come forward for redevelopment as housing subject to a range of criteria being met. This policy approach has been successful.</p> <p>The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>

<p>The real answer is the one we are not allowed to give: one cannot endlessly increase the number of residents in the south-east. Government needs to incentivise businesses to locate / relocate to other regions so that jobs are created there; with space for housing. It is not only the pressure on housing, but on other infrastructure and services - roads, parking, schools, hospitals, GPs, public transport, water etc - that follows from increasing the number of residents in the area.</p>	<p>Comment noted. Unfortunately this is beyond the scope of the Local Plan to intervene. The government has suggested that they are prepared to make some of the suggested interventions – perhaps most visibly by financing major transport improvements such as HS2. However, the government’s intentions appear to stop short of the “national “ that this response suggests.</p>
<p>Unfortunately not.....I'm hoping that the government will seek to understand and address the issues behind the increase in the housing demand instead of reacting to the demands.....</p>	<p>Comment noted.</p>
<p>Any new housing should be truly affordable and meet local needs.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>No to the loss of green belt, no houses full stop !</p>	<p>Comments noted.</p>
<p>Increased use of brownfield sites. Meet local needs only - our resources of land and infrastructure are finite.</p>	<p>Suggestion noted – this equates to Option 1.</p>
<p>Surrey</p>	<p>The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms.</p> <p>Many neighbouring Surrey planning authorities face the same challenges that we have – namely, that they are heavily constrained by Primary Constraints and the Green Belt and that they have an insufficient supply of available and deliverable sources of housing land.</p>

<p>Taller buildings should be located only where the character of the town is not impaired. They should not be obvious against the skyline or create tunnels of development. It is important in principle that this exercise preserves the amenities and character of the town. Beyond that it is clear that justifiable and properly evidenced targets cannot meet the need calculated by the new government formula.</p>	<p>Comments noted. Maintaining and enhancing the Borough's visual character and appearance is a key objective for the Local Plan. We accept that taller buildings may not constitute an appropriate development typology for every potential development in the Borough. We continue to believe that high quality design and respect for the existing townscape are key components for sustainable development in Epsom & Ewell.</p>
<p>Convert empty office blocks/brownfield sites to housing</p>	<p>Suggestions noted. Our existing policies provide opportunities for the redevelopment of vacant and redundant non-residential uses to come forward for redevelopment as housing subject to a range of criteria being met. This policy approach has been successful.</p>
<p>any new housing should be affordable and offered to local people especially those working in key areas like police, health workers, teachers etc we should work hard to find an alternative building area to green belt land look at how other countries with dense populations cope with these problems</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>Lobby government for funds to build council houses</p>	<p>Suggestion noted – while this may provide a future partial solution to the issue of housing affordability, lobbying government is beyond the scope of the Local Plan process. Nevertheless, the Borough Council will continue to make robust representations to government that seek to support the needs of local residents and communities.</p>
<p>Build a multi-storey car park on an existing industrial site in Kiln Lane and use the existing Sainsburys car par to build multi-storey accommodation. A similar scheme should be adopted at Ewell West Station car park.</p>	<p>Suggestion noted – this equates to Option 1.</p>
<p>Review current buildings that are unoccupied and why. Assess for change of status. There are currently limited high rises this should remain. Tall buildings can be high maintenance and fall into rapid disrepair leading</p>	<p>Comments noted.</p> <p>While empty properties are a legitimate source of housing land supply, it is highly unlikely that such sites will prove sufficient and reliable</p>

<p>to social inequity. Building new houses requires infrastructure. Currently there is a high build up of traffic with more potentially coming through Epsom and Ewell and wider area and use of A3, A246, A217, A24. Demographic and turnaround of older residents moving out of the borough freeing up homes for families. Council or social housing residents freeing up larger homes when no longer required or those no longer needing social housing giving up the property.</p>	<p>sources of supply. In many cases empty properties are only vacant for relatively short periods of time – for reasons that include refurbishment and resolution probate. The number of long term empty properties is relatively modest.</p> <p>The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>
<p>These are simply ideas to consider: Covert and/or redevelop offices in east street for cheaper / small / housing as part of a balanced "urban"/ GB solution [this element of course will only provide small units - unsuitable for families] . The area is ugly and would benefit from an upgrade visually . Extend the hospital developments to create genuine large village with a centre - perhaps with a pond or other feature [a village green ?] - a church, surgery, pub , shops and supermarket , meeting hall etc . The "green " land in this new development serves little purpose and is fragmented .. Extend Ashley Avenue to Church St and use any land released for high density housing and/or new high quality office / retail . As part of this approach consider the scope for redeveloping some of south side of High St and or/parts of town hall car park area [the area is unattractive suffers from pollution & traffic congestion ,is underused and full of vacant & charity shops which are not an asset to the town] .Consider redeveloping parts of Upper High street frontages as part of a more comprehensive approach to this whole part of the town]. It is simply</p>	<p>Suggestions noted. Our existing policies provide opportunities for the redevelopment of vacant and redundant non-residential uses to come forward for redevelopment as housing subject to a range of criteria being met. This policy approach has been successful.</p> <p>The Borough Council remains committed to the preservation and enhancement of the Borough’s heritage assets. We are also committed to ensuring that new development achieves good quality and inclusive design as a key component of delivering sustainable growth.</p> <p>We agree that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>

<p>no longer possible to preserve to town in aspic [although clearly the best parts should remain unchanged]. However whatever does get built- either in town centre and/or on the edge of urban area will need clear a master plan and be in scale and keeping with the town . Is the link road between East st and Longmead road really needed ? It will add more traffic to the already congested east st . It is also very expensive and will not provide many economic , access [except to the industrial estate] or environmental benefits - nor is it likely to realise the release new land for housing or offices . Whilst it will provide some relief to Ewell village - the village no longer serves much of a real purpose . A link between Ashley Ave Road and Church St, PLUS a western by pass [from the A24 in the Wells area to the Horton area] would be far more useful .It would relieve the town centre of much through traffic ,reduce town centre pollution /noise and thus provide more opportunity to support/improve the town centres function AND release new sites for urban homes and offices [the latter would be presumably of high quality and more lettable than the low quality office developments in East St]. It could also provide a new defensible GB boundary for the western edge for decades to come whilst providing opportunities for releasing sites for development on the "urban" i.e. east side . These road ideas should be explored with SCC.</p>	
<p>Compulsory purchase of properties that are long term unoccupied. Compulsory purchase of "land bank" sites</p>	<p>Suggestion noted. Current compulsory purchase powers are relatively restricted and contain an element of risk to the Borough Council.</p>

held by developers for potential supermarket expansion.	Changes in these powers would be necessary to ensure that such interventions would be successful.
Stop giving planning permission for executive homes and force developers to build smaller affordable homes. NO LOSS OF GREEN BELT. It's the trees and green belt which makes Epsom the great place it is and once green belt is lost it is lost forever.	Comments noted.
Older persons housing should be a main consideration in increasing the number of homes being built. It is important to consider the importance national planning policy places on older persons housing. National Planning Policy Guidance considers the provision of housing for older people to be critical given the projected 50% increase in the number of households aged 65 and over. It further states that Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This will free up houses that are under occupied. Epsom and Ewell also have a clear and unmet need for a range of specialist housing options for local older people, primarily home owners. Any sites for older persons accommodation will need to be located in close proximity to shops, transport links and other necessary amenities. The joint Advisory Note of the National House Builders' Federation and the National Housing and Town Planning Council entitled "Sheltered Housing for Sale" (2nd Edition - 1988) acknowledges that the ideal site for older persons housing is difficult to find but identifies the five main location criteria as:- (i) Topography (ii) Environment (including safety and security) (iii) Mobility (iv) Services (v) Community Facilities It is therefore	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation.</p> <p>Although the provision of specialised residential accommodation for older people continues to be important – it is proportionately a minority area of need. In that respect we will continue to meet this area of need where necessary. However, this will not be to the disadvantage of higher areas of need; namely, affordable housing and family-sized accommodation.</p>

<p>clear that such development will need to be provided in a location that is close to existing local facilities and good transport links. Furthermore research shows that most residents move from an approximate a 5 mile radius into new specialised older persons developments, which would necessitate developments being provided around existing centres. In light of the above it would therefore seem appropriate that additional housing should be accommodated on previously developed land around town centres or existing centres to allow for the appropriate allocation of older persons housing sites. Should this not be achievable and further greenfield options are required then urban extensions should be considered the most sensible option as this would provide existing suitable services and transport links. Expansions to existing villages could be considered acceptable subject to there being a satisfactory of existing services and transport links for older people to access. Older persons accommodation also has the added benefit of freeing up larger unoccupied housing that has an impact throughout the housing chain from families looking to move into larger dwellings to first time buyers. Therefore the additional provision of much needed older persons accommodation will help to ease some of the housing pressure.</p>	
<p>Sadly no. Other than perhaps buying up larger, adjacent houses which may come onto the market and redeveloping as small blocks of flats - Beckenham has been successful in this regard. But this is an expensive option.</p>	<p>Suggestion noted – this equates to Option 1. The comprehensive redevelopment of large houses that adjoin one another is development typology that is already common in the Borough. It typically manifests itself within our windfall supply.</p>

New housing should be truly affordable and meet local needs - not large detached/semi-detached houses which are not affordable.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
The emphasis should be on affordable housing with good transport links	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
New housing should be affordable and meet local needs. Prefabs could be a good temporary, cheap solution.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Change of use for all the empty shops and office buildings. Flats above shops. These could all increase the number of people who would shop locally in the town centre.	The Borough’s local centres and shopping parades provide highly valued retail provision, which is accessible to the majority of the Borough’s residents. Our adopted policy is resist proposals that degrade these centres. Nevertheless, they may provide opportunities for higher density development – above existing shops and commercial activities.
Brownfield sites and around pound lane, dump area of Epsom. Longmead estate	Suggestions noted – these equate to Option 1.
Do not touch our Green belt. Promote the idea of building a new town with the appropriate infrastructure somewhere flat and accessible some 50 miles north of greater London.	Comment and suggestion noted. The previous coalition government removed the regional/ strategic planning mechanisms that could have made this solution a reality. While the government supports the concept of “garden villages”, they have left it for individual planning authorities to take ownership for such possible solutions. There is no evidence that garden villages, by themselves, will provide a solution to the national housing crisis.
Option 4 notes that neighbouring local authorities will have to be relied on to help meet housing needs,	Comment noted. The changes in housing stock referenced in this response will not by themselves impact upon the scale and nature of

<p>however consideration must also be taken of the needs of surrounding authorities, including the London Boroughs which have recently identified a need for 66,000 homes per annum. This is likely to have an impact on housing delivery in the home counties. Opportunities for development should therefore be maximised through urban area searches and densities should be increased where appropriate. Spelthorne Borough Council have undertaken a study looking at the impact of household extensions on the dwelling mix, which tends to increase the stock of larger dwellings whilst depleting the supply of smaller more affordable dwellings. As such, this would reduce the requirement for larger dwellings and would allow a greater quantity of smaller dwellings to be built, at higher densities. A similar study may be helpful for Epsom & Ewell.</p>	<p>housing need identified within our SHMA. Equally, the impact of an expanding 'large house' portfolio, boosted by householder extensions is unlikely to have an immediate impact upon supply (that is during the Local Plan period). In conclusion, it is unlikely that any form of detailed analysis of this phenomenon will fundamentally influence the Local Plan.</p>
<p>Should meet local needs and be able to provide services to cover expansion gas/ electricity/ schools/ hospital and no to loss of our green belt</p>	<p>Comments noted.</p> <p>We agree that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>
<p>Any new housing should be truly affordable and meet local needs. Say no to the loss of Green Belt.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>It seems that the major demand is for modestly sized (ie affordable) houses rather than flats. Some of the developments on the hospital sites seem to supply that</p>	<p>Suggestion noted.</p>

and are clearly selling quickly, so my suggestion is to prioritise schemes like those.	
The Nescot development seems to add to the area. Further development such as these should be welcome. This works because this land was surrounded by busy roadways and had little alternative use. It also works because it is set away from the road and doesn't seem to impede on the environment. Similar development should be sought. Out of the way; hidden; or set back helps. There is land that has little use. However, park land and the countryside and woods should all be protected as green spaces are important for our well-being. All brownfield sites must be used as the first option.	Suggestion noted. Our existing policy approach is to seek good quality and inclusive design for new developments that protects and enhances the Borough's visual character and appearance. We are seeking to maintain this approach as we believe that this constitutes sound and sustainable planning.
The houses just built on the Nescot site are unnecessarily large. Many more homes could have been built in that space. So make the most of what is available.	Comments noted. It may be necessary for the Borough Council to review its approach towards housing density. It is possible that in the future proposals for low-density developments will be refused on the grounds of inefficient use of land.
Any new housing should be truly affordable and meet local needs. Say NO to the loss of Green Belt.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
New housing should be truly affordable and meet local needs. We must not lose Green Belt Land	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Say NO to any loss of Green Belt. Any new housing should MEET LOCAL NEEDS	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been

	to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any new housing should be truly affordable and meet local needs	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any new housing should be truly affordable and meet local needs. There should be no loss to the Green Belt.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Ensure that all empty homes are made available to the housing market.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any new housing should be truly affordable and meet local needs only.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
I think we as residents we have to be realistic and accept that if we don't come up with an appropriate plan, the Government will impose one on us. So whilst I would prefer not to have higher density/taller buildings, I would be happy with them providing they were brick built and in keeping with the ethos of the town e.g. those at the West Hill end of Station Approach. However, I would be extremely unhappy if the council permitted the building of concrete monstrosities like those opposite and above the	Comments noted. The Borough Council remains committed to securing high quality and inclusive design from new developments. Detail issues such as the quality of finish and materials are key components of good design. We are listening to the comments being made on this specific issue and we are seeking to learn lessons from past development proposals – so that future development will positively contribute towards the Borough's visual character and appearance.

station, and there was significant infill meaning that Epsom merged with neighbouring towns. It is essential that appropriate infrastructure is provided to support any building work	
Do not build on the Green belt, any new housing should be affordable and meet local needs	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Concentrate on redressing shortage of affordable housing	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Review population growth and what impacts it.	Our evidence, specifically the SHMA, considers this issue very carefully. While there are external factors such as internal and international migration that may influence future population growth it is noteworthy that the government’s proposed standard methodology does not apply such factors.
Any and all new housing development should be genuinely affordable and meet local needs. The loss of any part of the Green Belt is completely unacceptable.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
I am concerned by the number of shop closures in Epsom town centre, and would therefore query any safeguarding of shopping floorspace. This could be allocated for housing instead.	The Borough’s local centres and shopping parades provide highly valued retail provision, which is accessible to the majority of the Borough’s residents. Our adopted policy is resist proposals that degrade these centres. Nevertheless, they may provide opportunities for higher density development – above existing shops and commercial activities.

<p>I suggest you look more creatively around the borough and leave the current green belt well alone, especially those areas designated as under primary constraints. You would have done more to achieve new building targets by putting more houses on the current Priest Hill development, where you have built many more large million pound plus houses, and very few of the demographically needed, two and three bedroom houses. Please- DO NOT MESS WITH THE PRIMARY CONSTRAINTS AREAS. Also you must be aware that the historic nature of many areas of which the borough is privileged to have the stewardship, have huge value for your residents and you undermine the very attractiveness of the borough which attracts people to the borough to pay their rates</p>	<p>Comments noted. We can assure all respondents that our evidence base, specifically the SHLAA, provides a thorough assessment of available and deliverable sources of housing land supply. We will explore potential changes to our existing policy approach that may seek to redevelop sites more efficiently and to a higher density.</p> <p>Our existing Local Plan policies seek to actively protect and enhance the Borough’s heritage and biodiversity assets. The Issues & Options do not propose changes to any this approach.</p>
<p>No as Epsom is over populated as it is, we have flats going up everywhere. More houses have been allowed to be built on the Nescot site. When the agreed amount was 92 houses and now another 88 have just been given permission. No schools or doctors are being built, the schools and doctors cannot cope. We already have children coming from Preston lane to Epsom schools as that estate is so over populated, as they have developed on their park and they only have one school to house all these extra children. We just have a greedy council and greedy developers who care nothing about the protecting the green belt, and more about lining their pockets. The residents would not mind so much about new houses being built if the council actually used the profit from selling the land and reinvested it back into the borough, by building a new school for the children of the new residents. It</p>	<p>Comments noted.</p> <p>We agree that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p> <p>For the purposes of clarity, the Borough Council does not financially benefit from the sale or development of housing sites. In almost all cases, these sites are held in private landownership Any financial gain or profit is made by the landowner and/ or the developer. This reflects our free market society. The Borough Council draws a levy from certain types of development – this is known as the community infrastructure levy. This modest amount is ring-fenced as a source of top-up funding exclusively for the provision of new infrastructure required to support new growth.</p>

<p>should be made a compulsory clause to provide the amenities when new properties are being built. So until this is done I feel the council will never really listen to the residents they will just do what they want to do as they did with the Nescot site. It's quite convenient that the new principle of Nescot used to work for the council!</p>	
<p>any new housing should be truly affordable and meet local needs</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>New housing needs to be affordable and available for local residents. We must keep the existing open spaces and green areas in order to improve the quality of residential areas.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>All new housing should be truly affordable.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>Any new housing should be truly affordable and meet local needs. Say NO to the loss of Green Belt.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>Any new housing should be truly affordable and meet local needs. Say NO to the loss of green belt.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>

<p>By seeking to speed up sites which are left empty for years after an occupier leaves it (Police Stn; Organ Inn; County Court; Dairy etc to see whether any of these can be allocated housing. This applies too to empty office buildings.</p>	<p>Suggestions noted. It is noted that the specific sites identified in this response have either been allocated for housing (the former Police Station) or have been previously identified as preferred housing allocation sites (The former Organ Inn and Dairy Crest sites). Where sites are deliverable and developable we will consider them for allocation as sources of housing land supply. However, the development process remains dependent upon landowners and developers – the Borough Council can only facilitate potential sources of supply, it cannot build them out.</p>
<p>Any new housing should be affordable & meet local need only</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>All new housing should be truly affordable and there be sufficient infrastructure to cope with the extra population not as is happening in Epsom and Ewell where houses are being built with no thought for schools, hospitals, traffic etc. We are overpopulated now, do not make it worse. I say no to the potential loss of green belt.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>I would suggest the largely unnecessary "quota figure" is ignored. Any new housing should be truly affordable and no green belt land should be used.</p>	<p>Ignoring either the outputs from our own SHMA or the figure produced by the government's proposed standard methodology carries a considerable level of risk. We are exploring how we can seek to deliver as much of our housing need as sustainably possible during the forthcoming plan period. That process needs to be mindful of the outputs from our SHMA and any future figure that emerges from central government as it will need to address the issue of unmet need.</p>
<p>Any new housing should be truly affordable and meet local needs. There must be controls to ensure that new housing as much as possible go to people who work in the borough and not to overseas investors. I</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been</p>

<p>am concerned about any loss to the Green Belt particularly involving areas that currently support racing and other equine facilities. Epsom is famous throughout the world for its links to horses so if there are any changes to the Green Belt it should be managed in a way that does not adversely affect this. In fact some of the affordable housing that is needed could be set aside for the racing industry eg workers in the local stables. I do not want to see any parts of the Green Belt released but if this does happen it should not benefit owners/ builders by allowing them to erect large expensive houses as happened recently in respect of Priam Lodge Stables.</p>	<p>to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p> <p>The proposed intervention in the housing market, specifically to control who can purchase property, is beyond the scope of the Local Plan and is contrary to our free market society. Measures to address this issue would have to be introduced through primary legislation. The government have not indicated that they wish to pursue such measures.</p>
<p>The new housing must be affordable to meet local needs. Building large houses for greater profit does not solve anything except stripping Green Belt land. Once Green Belt is gone it is gone forever.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>No</p>	<p>Comment noted.</p>
<p>no buildings should be higher than 4 storeys anywhere</p>	<p>Comment noted.</p>
<p>Convert more office space that hasn't been used for the last 2 year into flats.</p>	<p>Suggestion noted. Our existing local plan policy provides sufficient flexibility for surplus and vacant office accommodation to come forward for other uses subject to a series of criteria being met.</p>
<p>Any new housing should be truly affordable and meet local needs. Every effort should be made to retain precious Green Belt land. Vacant/underused land with viable residential user options should be acquired compulsorily if necessary, cleared and developed. Areas of land sometimes remain vacant for years for various reasons, preventing viable use; powers to unlock such land should be procured/used to permit worthwhile residential development.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>

<p>Surrey</p>	<p>The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms.</p> <p>Many neighbouring Surrey planning authorities face the same challenges that we have – namely, that they are heavily constrained by Primary Constraints and the Green Belt and that they have an insufficient supply of available and deliverable sources of housing land.</p>
<p>Potential new housing should be truly affordable and meet strictly local needs. Our duty to the future generation is to preserve the Green Belt at any cost.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>I think the existing green belt land needs to be protected. If this is used for housing, we will lose the valuable green space, and the lungs of the area.</p>	<p>Comments noted.</p>
<p>Industrial buildings are generally low rise. If their use could be accommodated in new higher rise buildings it would release land.</p>	<p>Suggestion noted. Our existing policy approach is to retain and enhance our commercial and employment assets. Intensification of these uses may form the basis of a valid strategy in the future.</p>
<p>No, keep the current character</p>	<p>Comment noted.</p>
<p>Any new housing should be truly affordable and meet local needs. No to the loss of Green Belt</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>Surrey</p>	<p>The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms.</p>

	<p>Many neighbouring Surrey planning authorities face the same challenges that we have – namely, that they are heavily constrained by Primary Constraints and the Green Belt and that they have an insufficient supply of available and deliverable sources of housing land.</p>
<p>Looking around the outer parts of South West and South East London as a whole, there are parts of 'green belt' which are simply unattractive and hardly used for any purpose. As examples, there are several areas around and to the north of Croydon which are plain unattractive and little used other than for trains passing through. Developers though seem to wish to build in green belt areas near to existing expensive areas, presumably to aid sale, boost profits, and as most of the infrastructure will already exist there. This though is incompatible with the aim to build more affordable housing and destroys the more attractive and used parts of the green belt. In addition, it creates difficulties for local schools which are not easy to expand due to their locations. Building more houses should be planned with affordability, new schooling, and transport congestion issues in mind.</p>	<p>Comments noted. Our evidence base includes a comprehensive assessment of how our Green Belt performs against the five purposes set out in national planning policy. Our Local Plan process will consider the outputs from that study, and others, and determine whether there are opportunities to reconsider the status of poorly performing Green Belt parcels.</p> <p>We agree that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>
<p>Any new housing should be truly affordable and meet local needs. Green belt should be protected at all cost.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>incentive to down size</p>	<p>Suggestion noted. Providing incentives for people to downsize are beyond the scope of the Local Plan and would require changes to primary legislation, which is responsibility of government.</p>
<p>Any new housing should be truly affordable and meet local needs.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been</p>

	to respond to this and secure as much affordable provision as possible within the constraints of development viability.
No	Comment noted.
Meaningful incentives to occupiers of homes with under used accommodation (empty nesters etc), such as reduced stamp duty, tax breaks etc, when they 'trade down' and therefore free up larger properties for families needing such space. Powers to take over empty properties purchased by foreign investors and others, simply kept empty as an asset.	Comments noted. These proposals are beyond the scope of the Local Plan and would require primary legislation to be enacted. The government has not provided any indication that it is prepared to introduce such interventions.
See representations submitted via email - which demonstrate that Options 1, 2 and 3 have benefits and challenges and therefore Option 4 is considered the most appropriate and consistent with national policy and the recently published 'Fixing our Broken Housing Market' White Paper (2017).	Comment noted.
All the latest new homes, Horton, long grove ect has had, in the main, very few affordable homes. Most of the local need is for families, couples and single people in the mid to lower income bracket. If these houses have to be built then they MUST be affordable or social housing to meet the local need.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any new housing should be truly affordable and meet local needs. And definitely no loss of green belt.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Maximum use of brownfield sites. There are three sites close to the town centre; the old diary, the one close to the cinema and the Organ Inn site I understand various supermarket chains and fast food outlets have applied for development. We do NOT need more supermarkets	<p>Suggestions noted. The sites referenced are already under consideration as possible housing site allocations.</p> <p>In terms of retail, the latest evidence demonstrates that there is theoretical capacity for more retail floorspace during the life of the new</p>

and there is more than ample fast food available in Epsom These sites could provide a substantial number of dwellings.	Local Plan. Nevertheless, we acknowledge that changing shopping habits and patterns (such as the continued rise in e-tailing) will influence how much new retail floorspace will actually be required. We will respond accordingly.
We need affordable housing - ideally council controlled housing. This needs to be affordable in real terms to meet the needs of all sectors of the community. Too much development has been concentrated on the high end of the market. Too little property is available at affordable rent due to the massive increase in private landlord owned property.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
convert offices to housing if not let or sold	Comments noted – our existing Local Plan policies already allow a degree of flexibility in terms of the conversion of vacant and redundant commercial floorspace.
Land purchasing & development programme targeting derelict property and bankrupt businesses e.g. pubs (brownfield development). Coordinating private developers better - maximising the use of land as it becomes available.	Suggestion noted.
surrey	The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms. Many neighbouring Surrey planning authorities face the same challenges that we have – namely, that they are heavily constrained by Primary Constraints and the Green Belt and that they have an insufficient supply of available and deliverable sources of housing land.
Only new housing that is affordable should be considered and no green belt loss is acceptable.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been

	to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Housing should be affordable and meet local needs. No loss of Green Belt. If as a last resort allotments etc. are reallocated to green belt then they should retain green belt status, and be protected from development. The whole of England will not fit in the South East.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
any new housing should be truly affordable and meet local needs. I do not want to lose any Green Belt in Epsom. Our small town is already at breaking point with our schools, roads, parking and other facilities. When we moved here in 1991, it was a quiet and peaceful town with a village feel, but now it is chaotic, and extremely busy.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Surrey	The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms. Many neighbouring Surrey planning authorities face the same challenges that we have – namely, that they are heavily constrained by Primary Constraints and the Green Belt and that they have an insufficient supply of available and deliverable sources of housing land.
Convert offices and unused shops to homes. Without the Green Belt we would have been swamped by the growth of London years ago. Don't build on it. Once it's gone, you have destroyed it forever.	Comments noted – our existing Local Plan policies already allow a degree of flexibility in terms of the conversion of vacant and redundant office floorspace and the upper floors above retail units to housing.
Surrey	The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms.

	<p>Many neighbouring Surrey planning authorities face the same challenges that we have – namely, that they are heavily constrained by Primary Constraints and the Green Belt and that they have an insufficient supply of available and deliverable sources of housing land.</p>
<p>Focus on optimising the potential of brownfield sites in accordance with paragraphs 11 and 17 of the NPPF both of which highlight the importance of effectively reusing brownfield land and seek to: “... encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.” In accordance with the above, in sustainable locations, such as those within town centres or with good levels of accessibility, increased densities should be encouraged to ensure the effective use of brownfield land. The Housing White Paper – Fixing Our Broken Housing Market (February 2017) (The Housing White Paper) also seeks to plan for the right homes in the right places, in part by maximising the contribution from brownfield land. The Government is currently consulting on further measures set out in the Housing White Paper to boost housing supply in England. The consultation sets out a number of proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth. A key element of the consultation is proposals to standardise the calculation of objectively assessed housing need (OAN). The proposed methodology would result in increasing Epsom and Ewell's OAN to 579 dwellings per annum (+161 dwellings / +39%). The consultation also notes that 46% of Epsom and Ewell is Green Belt, National Parks, Area of Outstanding</p>	<p>Comments noted.</p>

Natural Beauty or Sites of Special Scientific Interest which reiterates the importance of optimising brownfield redevelopment opportunities.	
Any new housing should have a high quantity of affordable housing, this should be aimed at first time buyers. No developments should be built on green Belt Land	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability
After brexit you won't need so many houses. A lot of people will start to leave as they won't be able to afford to live in this country. once you touch green belt, that's it really, you will just destroy it.	Comments noted. Housing demand is comprised of a number of factors, including resident population growth; change in household composition; internal migration; the economic climate/ the desire to invest in property and international migration. Recent studies have demonstrated that management of international migration will not by itself make a significant difference to housing demand.
Most homes need 2-3 bedrooms. So build flats with 2-3 bedrooms. Build fewer large luxury houses or none at all. convert more office into flats.	Comments noted. Our SHMA provides comprehensive evidence on the size and type of housing that is in demand/ needed across the Borough's housing market area. The Borough Council may seek to introduce a new policy approach that requires sites are developed more efficiently and to a higher density.
Any new housing should be truly affordable and meet local needs.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Continue to convert empty older office blocks. Review all land and services needs of NHS at Epsom Hospital - scope to condense facilities including surface level parking and provide a more compact and intensive hospital freeing up land. Consider development on the larger car parks including at Kiln Lane - place development over surface level parking. Introduce more resident permit areas near stations and restrict	Suggestions noted. Our existing policy already provides opportunities for vacant and redundant office floorspace to be considered as potential sources of housing land supply. Our existing policies also provide opportunities for developers to bring forward schemes that increase the height of existing buildings – subject to our height policies. We may consider

parking for developments in those areas if the access to public transport is good thereby making more room for houses and less space for parking. Adopt a flexible and proactive approach to proposals that add additional floors to existing blocks of flats. Identify selective areas for intensification.	amendments to our approach to provide greater opportunities for this to happen in the future. The introduction of controlled residents' parking is beyond the scope of the Local Plan. The introduction of such zones is subject to consultation with residents.
Affordable housing is a MUST but one rarely sees it! Make use of 'Brown field ' sites and leave the Green belt for the benefit of future generations please.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any new housing should be truly affordable and meet local needs.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Brownfield sites. Any new housing should be affordable and meet local needs.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
No	Comment noted.
Any new housing should be truly affordable and meet local needs. Say no to loss of Green Belt.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
The office blocks along East St., so many vacant / the scrubby land off Horton towards Hook Rd Arena, not the country park / Redevelop and improve around the estates at Longmead and Watersedge, improving for tenants and rationalising space / the back areas off	Suggestions noted. Our existing policies already provide opportunities for genuinely vacant and redundant office floorspace to come forward as sources of housing land supply.

<p>East St, / the area from Chessington towards Tolworth / use one of the golf courses</p>	
<p>Construct retirement village to free up large houses for families.</p>	<p>Suggestion noted. Evidence demonstrates that our overwhelming need is for affordable housing, followed by new family sized accommodation. While the release of existing housing stock via downsizing has a role to play in this process, evidence suggests that it will only make a modest contribution as source of supply during the new Local Plan period.</p>
<p>No. It appears that central government are determined to force too many houses into too little space, given that much of Epsom & Ewell green belt does fulfil the intended purpose of preventing London sprawling indefinitely. Further, the fact that a large fraction of the green belt has other designated protections (SSSI, LNR, SNCI, etc.) testifies to its value for nature conservation and biodiversity - which the Council has a statutory duty to uphold (Natural Environment and Rural Communities Act 2006). The council should also remember that biodiversity requires continuity of habitat, not increasingly isolated nature reserves, so the parcels of green belt between the reserves are also critical.</p>	<p>Comments noted.</p>
<p>The housing need is created by attracting people into the borough. The more housing that is built the more the problem grows. Housing needs to be affordable for the youngest home buyers to be able to afford and rise up the chain.</p>	<p>Comment noted. This is precisely how the government's proposed standard methodology works – namely, that supply drives demand. The Borough Council does not believe that a supply and demand solution to affordability will work.</p> <p>Housing supply is a highly inelastic commodity. Increasing supply will not necessarily reduce price, unless it was to be on a massive scale, and at a scale not envisaged by the government. Some academic work considers that a 1% increase in stock at a national level would be required to reduce prices by 2%. This would imply an annual</p>

	requirement of 196,000 additional private sector dwellings. Other evidence estimates that a 50% increase in housing starts between 2013 and 2031 would only have the effect of improving the affordability ratio by 1.3 points at a national level.
Any new housing should be truly affordable and meet local needs. The Green Belt should remain unaffected.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any new housing should be truly affordable and meet local needs. No to the loss of Green Belt	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any new housing should be truly affordable and meet local needs	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Use former hospitals site for more houses. Horton Country Park still a green boundary. Try to use Hollywood Lodge site. Put time limit for completion from date of permission.	Suggestion noted. The residual elements of the Hospital Cluster, at the former West Park (Noble Park) site have already been factored into our assessment. While Hollywood Lodge may provide a potential source of housing land supply we anticipate that will only yield a small number of new homes. Planning permissions are already limited to a three year life span.
No use of the Green Belt Epsom is already at capacity, and further housing also means further roads schools surgeries and hospitals	Comment noted.
Any new housing should be affordable and meet local needs. NO LOSS OF GREEN BELT.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been

	to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Convert office space to housing. If significant more housing is built then infrastructure including schools, hospital upgrade, sewer upgrades need to be done. Roads are already at full capacity	<p>Suggestion noted. Our existing policy approach provides opportunities for genuinely vacant and redundant office floorspace to come forward as possible sources of housing land supply.</p> <p>We agree that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>
Any new housing needs to be affordable and must meet local needs. There should be no loss to the green belt. However, if this is unavoidable, build on golf courses.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any new housing should be affordable housing which meet the needs of local people and key workers. No loss to green belt.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Clearly show what brownfield sites are in the area and the plans for their usage. Clearly show what unutilised land is in the area, both public and privately owned. Use these sites before considering and then consulting on any plans for greenbelt land. Any new housing should be shown to be affordable and demonstrate that it meets local needs for local people.	Comments noted. We have already carried out a thorough assessment of the available sources of housing land supply within the existing urban area as part of our evidence base. This information is set out in our SHLAA. Whilst it is tempting to believe that there are more potential sources of supply within the existing urban area their genuine availability to the market is highly questionable. On that basis, such sources cannot be relied upon as future housing land supply.
More flats should be built to maximise number of dwellings without using so much land. This must be affordable to rent or buy. Town centre and railway stations being preferred sites. Green belt should be	Suggestions noted.

protected and used minimally to preserve the character of the borough.	
Allow supermarkets/DIY traders to build upon their out of town locations to provide extra housing - for example Sainsbury's, Asda and Wickes	Suggestion noted. Our existing policies would allow this to happen – subject to current constraints on building height. However, market signals suggest that these types of retailer are reluctant to pursue this type of development model. In many cases, their profit margins are so high that there is limited incentive for innovation. Equally the construction process may result in temporary displacement of their retail activities which goes against their trading model.
Utilise unused office blocks and empty property. Do not allow luxury developments like the St Ebba's site which could have held probably 1000's of starter flats - do not waste the space we have	Suggestions noted.
The site of the organ Inn pubic house which has been demolished and left as a pile of rubble	Suggestion noted – this site is already identified as a potential future source of housing land supply.
New housing should not have a negative impact on existing residents within the borough. The first priority should be to address the infrastructure problems created by recent new developments. For Example traffic congestion within the town centre by the building of the link road so through traffic dos not come into the town. Schools etc. Any new housing should be affordable and meet the needs of local residents. There should be no loss of the green belt and amenities such as parks and allotments.	We agree that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.
Place a 18 month time limit on how long developers can hold building land before commencing building on it	Suggestion noted – planning permissions currently have a three year life span. Shortening that life span would require changes to primary legislation.
A review of under utilised commercial property (shops, office, etc) in town centres could be done by converting shops into housing. This would offer affordable housing to younger or less affluent people close to the	Suggestion noted. We regularly review the occupancy rates of town centre commercial premises. Market signals, from local property agents, suggest that demand for town centre retail and commercial floorspace remains high across the Borough.

amenities and transport hubs while bringing more life into the town centres thus boosting the viability of local food shops etc. It would also remove surplus shops from the excess stock reducing empty or under utilised properties and allow the remaining shops to command a slightly better income.	
Any new housing should be truly affordable and meet local needs. This should be achievable without significant loss to the Green Belt if potential sites beyond traditional Brown Field sites are explored. For example Epsom's industrial and commercial sites mostly comprise single storey buildings spread over significant acreage with existing infrastructure. Such locations could be utilised for "higher rise" mixed housing/business purposes on the same "footprint".	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
we do not agree with losing Green Belt as once you start you will continue to erode for years to come- we want to think of not just the next 25 years but hundred years. Any new housing should be truly affordable and meet local needs- it is very difficult for young people and key workers to live in this area. Housing is just too expensive and developers are all building high cost housing.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation.
obviously higher density housing is needed but the problem is always parking. Better bus services and no car park spaces would be an answer accompanied by a concerted approach to getting residents to walk, cycle or use public transport. Building on car parks might be an option.	Comments noted. We are actively exploring how we can work with our infrastructure partners to provide effective and meaningful improvements to our highway network. Given the constraints to our highway network it is likely that modal shift to public transport, cycling and walking will be pursued as solutions in the medium-long term.
Surrey	The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the

	<p>coalition government. The government are not currently proposing to reintroduce those mechanisms.</p> <p>Many neighbouring Surrey planning authorities face the same challenges that we have – namely, that they are heavily constrained by Primary Constraints and the Green Belt and that they have an insufficient supply of available and deliverable sources of housing land.</p>
<p>Build in basements where possible. Build terraced housing with two or three bedrooms and gardens, stairways adjoining. Build town houses on three floors so you are using less ground space to build a more spacious two or three bedroomed house. When building flats make use of roof space to get an extra floor without having to build higher. New housing should be truly affordable and meet local needs, not the pockets of the developers. Make sure that you have sufficient landscaping - trees in particular- when new homes are built.</p>	<p>Suggestions noted. We agree that in the right locations and within the correct context higher density housing designs and typologies can contribute towards boosting housing supply.</p> <p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation.</p>
<p>We should avoid the spread of urbanisation as it is the thin end of the wedge. Where will it end? Epsom and Ewell are already big enough and the population in the south east is too dense. If we are obliged to build more housing I would put it above or behind shops. Maybe give up some banks, estate agents and charity shops and have houses there instead. If we have to use any open areas I would encourage giving up golf courses as these are only accessible by one section of the community and Surrey has a lot of them. I would be wary of providing extra schools or other infrastructure, in order to discourage the influx of more people into the area.</p>	<p>Suggestions noted.</p>

Any new housing needs to be truly affordable and meet local needs	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Provide incentives for companies to relocate businesses to new out of town sites, releasing brownfield land for housing. Greater use of on line shopping and delivery to homes reduces the need for retail sites close to town centres.	Suggestions noted.
No. But I'm seriously concerned about the infrastructure problems that a large increase in housing will throw up. In particular our roads are already overcrowded with no significant planned improvements in view (despite the current town centre road works). I suspect the same can be said for our education and health services.	We agree that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.
Planning permission for residential developments of significant size should only be granted to meet proven local needs. The necessary criteria would need to be established but enforcement should be via planning obligations pursuant to Sec 106 of the T & CP Act 1990. It will be totally unacceptable for the current established population of Epsom and Ewell to have to accommodate further overspill from London - the infrastructure could not cope. Surrey roads are now congested 7/7 and neither SWR nor Southern Railways can expand to cope with further passenger demand.	<p>Comment noted. While the Borough Council has some sympathy it this particular opinion, national planning policy is increasingly focused upon addressing the housing crisis in purely quantitative terms – rather than addressing the distinct components of need. Evidence from recent local plan examinations suggests that Inspectors are unlikely to consider local plan policy that restrict growth in the suggest fashion as sound. Consequently there would be a level of risk in pursuing this proposal.</p> <p>We agree that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>
No	Comment noted.

Any comment about the need for housing must start by, in the first place, questioning the validity of the data that is circulated by all of those involved. The Surrey Infrastructure Study indicates population growth of 61,000 by 2030 and 47,000 new homes across the County. These estimates are at considerable variance with ONS National Forecasts which double the estimates for Surrey. Central Government Housing Study indicates 579 new houses per annum for E&EBC, compared with 418 recently estimated by Cobweb Consulting. The 579 figure is described as "Indicative assessment based on proposed formula for annual housing need". Other Surrey Boroughs with a high proportion of Green Belt and large land areas are asked to build proportionally fewer homes, for example Runnymede has 79% Green Belt and a Government new housing estimate of 557 pa; Waverley 64% Green Belt and 538 new houses pa. The Government has also suggested that two boroughs, Surrey Heath and Woking, should actually build fewer new houses than the borough itself has suggested. Looking at Green Belt issues the Government data shows 46% of E&EBC is Green belt compared with between 60 and 89% for the other Surrey boroughs. Yet with the smallest borough land area & lowest Green Belt E&EBC is expected to take a massively disproportionate increase in housing. The Surrey Study also claims a massive shortfall on funding for infrastructure for schools, health and transport over the period to 2030. With regard to affordable housing requirements, currently 40%. Yet Government allows developers to circumvent the process by claiming that

Comments noted. Nevertheless, national planning policy is challenging us to respond housing demand. We cannot simply say that the Borough is full and infrastructure cannot cope.

National planning policy requires us to prepare our evidence in a very specific way – especially in terms of how we calculate objectively assessed housing need. This requirement is not a media invention. Failure to meet national planning policy may lead to government directly intervening in how we plan for the Borough’s future needs. It is more likely to result in ad hoc planning, promoted by predatory developers via the planning appeal system.

The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.

Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.

We share your concerns, particularly in relation to the apparent obsession to secure housing numbers, as opposed to planning for sustainable growth. We already submitted a robust response to the government’s proposals. Nevertheless. We have to work within the planning system that the government is creating.

<p>40% makes such developments not economically viable i.e. not enough profit. In which case there will never be enough affordable housing. E&EBC's infrastructure is already bursting at the seams and there is not enough land to support an additional 20,000 people and up to 12,000 homes. Epsom is sought after as a place to live because because of its environment - the suggested development will ruin this area, and it is not reversible. The Government figures for new housing over 15 years are as about as believable as next year's Treasury Forecast for tax revenues - when did they ever get that right?</p>	
<p>Build blocks of tall flats along busy main roads in the borough. Family homes don't sit well on such roads for road safety reasons but flats do and occupants are not deterred.</p>	<p>Suggestion noted – the proposal to build higher density housing along transport corridors is valid and could form part of sustainable solution.</p>
<p>Maximise development of appropriate brownfield, underused retail and industrial sites BEFORE even considering the development of any Green Belt land in the borough. The majority of new housing should be genuinely affordable and cater for local needs.</p>	<p>Comments noted. We have already carried out a thorough assessment of the available sources of housing land supply within the existing urban area as part of our evidence base. This information is set out in our SHLAA. Whilst it is tempting to believe that there are more potential sources of supply within the existing urban area their genuine availability to the market is highly questionable. On that basis, such sources cannot be relied upon as future housing land supply.</p>
<p>Need to assess how much office space is required. There seem to be too many office blocks unoccupied or only partially occupied. Is there scope for mixed use e.g. offices on ground floor and flats above? Some of the green belt appears to be unused agricultural land: better to develop some of it and also create high quality woodland/open space/parkland/wildlife conservation areas instead. The borough is too small and too developed to include agricultural land in future</p>	<p>Suggestion noted. We have carried out a number of employment floorspace demand. The market signals indicate that demand for commercial and office floorspace remains strong. Evidence shows that vacant offices and commercial buildings that are fit-for-purpose continue to either let or sell within reasonable timeframes. Our existing policy approach provides the opportunity for genuinely vacant and surplus stock to be redeveloped for other uses.</p>

<p>The government needs to promote the Northern Powerhouse. Chris Grayling and the government needs to develop transport infrastructure to encourage the North to grow, making it more attractive as it is under populated taking pressure off housing in the south. Converted pubs, shops, office buildings should encourage conversion into housing. Build above supermarkets as this is dead space.</p>	<p>Suggestion noted. Unfortunately our Local Plan is unable to influence government policy making. While the government has indicated that it is prepared to invest in national infrastructure projects that might help to unlock the growth potential of other regions of our country it has not indicated that it is prepared to undertake national (or indeed regional) plan or strategy making.</p> <p>Our existing policy approach provides the opportunity for genuinely vacant and surplus commercial stock to be redeveloped for other uses.</p>
<p>Provide more suitable retirement housing, to enable under occupied family housing to be freed up by elderly residents. This would need to be not just flats, but smaller houses with some outside space for people who still want to enjoy a garden. Any new housing should be truly affordable to meet local needs. We don't need more executive houses. We need more social housing.</p>	<p>Evidence demonstrates that our overwhelming need is for affordable housing, followed by new family sized accommodation. While the release of existing housing stock via downsizing has a role to play in this process, evidence suggests that it will only make a modest contribution as source of supply during the new Local Plan period.</p> <p>Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>The old BBC sports ground in Motspur Park has been derelict for years and is an eye sore, liaise with Kingston to find a way to build on unused land before green belt. You could build a village there and share with another borough, make the owners build houses. Please do not build on local parks, open spaces or allotments especially Nonsuch Park which gives so much pleasure to so many people. What will the Queen say if her view of the Derby is obscured by a block of flats on the downs. Just because a green</p>	<p>The former BBC Recreation Ground lies outside of our housing market area and as a consequence will not contribute to meeting our housing need.</p> <p>It is noted that most of the Borough's formal and informal open spaces are subject to additional, in many cases legal, designations which mean that that they are not genuinely available as sources of housing land supply.</p>

space does not have special protection it does not make it any less important to the people who use it.	
Any new housing should be truly affordable and meet local needs.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Please use all the brown land and disused large office buildings. Especially ones that have not been occupied for more than 2 years this will prove that they are not suitable for purpose as office space.	Suggestion noted. Our existing policy approach provides the opportunity for genuinely vacant and surplus commercial stock to be redeveloped for other uses.
Build more smaller units for first time buyers such as 1 or 2 bed room apartments	Comments noted. Our evidence, specifically that in the SHMA, provides a thorough assessment of need – inclusive of demand for smaller residential units.
Housing need should be met by building in larger urban areas. Increased housing density in smaller urban areas like Epsom on brownfield sites is fine, but the majority of new housing should be met by building taller buildings in larger urban areas. No greenfield sites should ever be considered, in order to protect the character of the country, not just Epsom.	Suggestion noted. Unfortunately our Local Plan is unable to influence government policy making. While the government has indicated that it is prepared to invest in national infrastructure projects that might help to unlock the growth potential of other regions of our country it has not indicated that it is prepared to undertake national (or indeed regional) plan or strategy making. Within such a national planning policy context we have to do the best we can.
Is there a possibility of adopting innovative schemes attracting older residents (who might be living alone in unsuitable buildings) to downsize to smaller, desirable, fit for purpose accommodation and therefore releasing large properties, including e.g. for quality multiple occupancy possibilities (e.g. students and workers). This approach might also facilitate mixed residential areas, not segregated by e.g. age. How far have plans for making empty office space into residential accommodation been exploited?	Evidence demonstrates that our overwhelming need is for affordable housing, followed by new family sized accommodation. While the release of existing housing stock via downsizing has a role to play in this process, evidence suggests that it will only make a modest contribution as source of supply during the new Local Plan period. Our existing policy approach allows such sites to come forward already subject to them being genuinely vacant and/ or redundant. It is highlighted that although there is a perception of there being a multitude of vacant offices, the actual scale is modest and any potential supply finite.

<p>New housing should be affordable and meet local needs. Unacceptable to lose more of the Green Belt unless absolutely necessary.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>Firstly, please note that there is an error in the Primary Constraints document. This document identifies the areas of greenbelt which have no primary constraints associated with them. (Broad Areas of Search). The area around South View, KT19 7LA is shown correctly as having an Ancient Woodland Primary Constraint and an SSCI Primary Constraint on the individual plans in this document, but it is shown as having NO Primary Constraints on the All Constraints plan. Please would you correct this document? Secondly, the new Government method of calculating housing need is still currently under consultation and that consultation does not end until 9th November. https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals This PROPOSED new method of calculating housing need says that EEBC would require 579 new homes each year, rather than the 418 EEBC’s own studies indicate are required. Why are we holding a consultation now about how we are going to meet the higher figure (of 579) when that higher figure has not yet been agreed? Like others have said, new homes need employment opportunities and infrastructure (roads, public transport, schools, doctor’s surgeries etc). Providing many new homes and associated infrastructure would result in town cramming. Epsom already suffers from a lack of local</p>	<p>Comments noted.</p>

<p>employment opportunities. Take a look at the awful congestion each morning and evening on the roads in and out of Epsom. Build 579 new homes per year and the roads will become unworkable. I think it is also a little naive to suggest that building affordable homes will serve the needs of local people. Any affordable homes built are sold to anyone who wants them, whether they are local or not. Most homes built here are not truly affordable for the key workers who need them. Building so called affordable homes will just encourage migration from other areas and put extra pressure on existing infrastructure. Build higher density new homes with truly affordable long term leases. An insurance company is already doing this in the UK. These would be truly affordable long term rentals, allowing security of tenure and the opportunity for the occupants to save for their own home if they wish. Not everyone has the security of income (with today's gig economy) to be able to get a mortgage.</p>	
<p>The approaches to our town are very important. At the moment, only East Street offers a rather dismal approach to the town: suggest from Windmill Lane to the Town Centre is another area that should be used for housing as properties become available. The approach down Alexander Rd is in threatened by the planning application submitted by Aldi, which should be rejected, on heritage grounds in the light if this consultation and the Lidlt plan (the application by Lidl is closer to the Town Centre, and if we must accept supermarkets we don't need, then at least it is closer to the Town Centre).The Jewson's site Alexander Rd has had a detrimental on the environment and heritage,</p>	<p>Suggestions noted.</p>

this should be bought by EEBC as soon as possible, and used for appropriate housing.	
Any new housing should be truly affordable and meet local needs. Say no to the loss of green belt.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
No but, while I appreciate the need for additional housing, I think it is crucial that we maintain the Green Belt for future generations. Building on the Green Belt would undoubtedly be the thin edge of the wedge and would lead to extreme environmental damage. We've already done enough damage to the environment, let's not make things even worse.	Comment noted.
Any new housing should be truly affordable and meet local needs. No loss of Green Belt.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
If we have to give up green belt and suffer higher densities, affordable housing needs to be built. Much of the problem we have now is because we have concentrated on building for the upper end of the housing market. Therefore 60% of affordable housing is not enough. Also I notice that there has been a lot of building for the elderly which is good, but going by the fact that these flats do not sell well, I think that that market has been saturated whilst the needs of younger people has been neglected.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
No loss of green belt Affordable housing	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been

	to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Priority should be given to developments which provide predominantly 2 and 3 bedroom properties at affordable prices for younger families and couples starting out. There is an ample supply of larger properties in the borough, and while these may be more profitable for the developer they do not warrant sacrifice of existing green resource. Careful consideration should also be given before granting further permits for reserved accommodation for the elderly. There are already a considerable number of these in the borough with a steady stream of quite long standing vacancies. It is not clear how far these are sold onto incomers rather than freeing up residential properties in the borough for local buyers.	Comments noted.
Any new housing should be truly affordable, Epsom does not need any more 4 bed 3 bathroom houses, meeting local needs for local people. Leave the Green Belt alone. Once it's gone it's gone for ever. Where would it stop.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Convert empty offices into flats e.g. like on east street but there are more empty offices. There may be industrial buildings that could be converted into housing. Ensure empty properties are utilised Review how many large properties have 1 person living in them- would more affordable housing for elderly people help- may need a scheme to encourage this e.g. support to look round May be space on Longmead and other council estates to offer more affordable housing.	Suggestions noted – our existing policy approach allows such sites to come forward already subject to them being genuinely vacant and/ or redundant. It is highlighted that although there is a perception of there being a multitude of vacant offices, the actual scale is modest and any potential supply finite.

<p>Please would you correct the all constraints plan which is inaccurate for the area of land around my home? It shows as having no constraints when it has two separate types of constraint. The individual plans for the individual constraints are accurate. it is just the amalgamated all constraints plan which is incorrect. Thanks</p>	<p>Comments noted.</p>
<p>Nature preservation is crucial (green belt)</p>	<p>Comment noted.</p>
<p>We are already saturated.</p>	<p>Comments noted.</p>
<p>Before making suggestions as to how to boost and meet the housing needs we need to address the infrastructure ie Hospital/ Schooling. Even more importantly is are the houses going to be affordable which if this is the case are we proposing Epsom Ewell council are going to promote 1945 council estates in the borough (I doubt it).Any property built by a builder has to show a reasonable return. So called affordable housing is not the builders first choice. Many use buy out clauses not to build them .this will not change. These proposals are cart before horse. In question 10 by selecting any option you give the go ahead for one of your 4 preferred options (rather clever but devious)</p>	<p>Comments noted.</p>
<p>Where a private developer has bought up land (eg Organ Inn and Upper High Street) and not started to build within a set period (eg 2 years), the Council should take ownership of that land. This should be a requirement for all planning applications.</p>	<p>Commented noted. Unfortunately, the proposed intervention is beyond the scope of what can be achieved through the Local Plan. This type of landownership intervention would require significant changes to primary legislation, which only the government is capable of enacting.</p>
<p>Why are we allowing planning permission for massive houses on the elite can afford, rather than seriously considering the needs of the mass population. I think at the moment both ALDI and LIDL have both got planning applications in within the town...we already</p>	<p>Comments noted.</p>

<p>have sainsbury's , a waitrose and a tesco express and a Co-op within walking distance of one another- perhaps the council need to look at these planning applications and instead look at building nice blocks of flats there so people can be accommodated. Its a popular little town but if were not careful we will start putting people off as the town becomes too overstretched and services such as hospitals and schools and police cannot cope with the increasing population.</p>	
<p>Any new housing should be truly affordable and meet local needs. No to the loss of Green Belt.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>WE SHOULD NOT BE BUILDING ASNY POPERTIES ON GREEN BELT LAND AND SHOULD ONLY USE EMPTY OFFICE BUILDINGS AND LAND WHICH ALREADY HAS DEVELOPMENT ON IT WHICH CAN BE REPLACED. ROADS SUCH AS THE CHEAM AND REIGATE ROADS HAVE UNPRESEDENTED LEVELS OF TRAFFIC ALREADY AND CANNOT COPE WITH ANY MORE VEHICLES</p>	<p>Suggestions noted – our existing policy approach allows such sites to come forward already.</p>
<p>No</p>	<p>Comment noted.</p>
<p>Use run down office blocks and shops as housing also brown sites let us keep our beautiful surroundings</p>	<p>Suggestions noted – our existing policy approach allows such sites to come forward already.</p>
<p>Any new housing should be truly affordable and meet local needs</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>

<p>Any new housing should be truly affordable and meet local needs. I really don't want to lose the green belt area</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>In no circumstances should taller buildings be permitted anywhere. These sky scrapers popping up are horrendous - take that awful Croydon building saffron Tower. Identify parts of green belt that are suitable without opening that as precedent to build too widely. Identify pinch points in traffic systems and require developers to invest in improvements. Epsom station needs to be put in zone 6 to reduce strain on Ewell west. The trains are already packed how is transport meant to cope with these new homes - why is cross rail 2 not been pushed more.</p>	<p>Comments noted.</p> <p>We agree that regrading Epsom Station so that it lies within the Oyster Zone would be highly beneficial for residents and for business. We have made representations on that basis. However neither the rail operators nor the government has shown any willingness to make this happen.</p> <p>We are working very closely with the Cross Rail 2 promoters to understand the benefits that this proposal will bring to the Borough. It is highlighted that should Cross Rail 2 come forward it will do so during the 2030s, which lies just beyond the new Local Plan period.</p>
<p>why not reduce out of town superstores and build houses and encourage growth in the High Street</p>	<p>Suggestion noted – this equates to Option 1. It is possible that as retail patterns/ habits change due to increased e-tailing that the need for large out-of-town foodstores will diminish. Should that prove to be the case such sites may become suitable sources of housing land supply.</p>
<p>I think you need to review ALL housing provision the the age profile of residents, and consider things like older residents living in large houses who may want to move to a retirement property in the borough (not a care home) but cant find a suitable property or need assistance to move e.g. advice/organisation/support. We need a mix of houses, not more flats.</p>	<p>Comments noted. Our evidence, specifically the SHMA provides such an assessment.</p>
<p>Ensure affordable housing is indeed affordable and provided to those from within the borough.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been</p>

	to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Utilize unused designated office space as residential, where appropriate i.e. above shops and in empty office blocks.	Comments noted – our existing Local Plan policies already allow a degree of flexibility in terms of the conversion of vacant and redundant office floorspace and the upper floors above retail units to housing.
Truly affordable housing would be of much more use than those presently being built which are mostly at the very expensive end and developers never seem to meet their offer of some affordable housing always wriggling out of any obligation other than to make as much money as possible. Current developments like Reigate Road near Nescot are simply causing more traffic congestion and further burdens on schools, doctors etc.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any additional housing should be truly affordable and serve the needs of local people	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any new housing should be truly affordable and meet local needs.No building on the Green Belt	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any additional housing should be truly affordable ie social housing and serve the needs of local people. No to the loss of Green Belt	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
No	Comment noted.

<p>Far greater review of underused office space, upper floors of high street retail units and development of quality smaller home options for elderly people such that single elderly people can move out of large family houses to suitable elder care accommodation releasing family sized properties to council/ private sale market.</p>	<p>Comments noted – our existing Local Plan policies already allow a degree of flexibility in terms of the conversion of vacant and redundant office floorspace and the upper floors above retail units to housing.</p>
<p>Good quality retirement housing with some form of community arrangement is badly needed. A leafy area fairly close to town with flats having large rooms and balconies would be attractive to, and could be afforded by, many older people who currently cling to large properties because they cannot see an attractive alternative. This would release a lot of large properties onto the market. Pokey rooms in squashed four storey blocks are just not an alternative. Infill development should also start to be allowed as long as the properties are of the right character and allow sufficient garden. Many owners would probably prefer not to have a third of an acre garden if they were left with more cash and sufficient remaining land. Better to do this than lose even more green belt.</p>	<p>Suggestion noted. Evidence demonstrates that our overwhelming need is for affordable housing, followed by new family sized accommodation. While the release of existing housing stock via downsizing has a role to play in this process, evidence suggests that it will only make a modest contribution as source of supply during the new Local Plan period.</p> <p>Infill and backland developments may continue to serve to contribute towards housing land supply. However, because of their windfall nature such sources of supply are erratic and cannot be relied upon to meet anything more than a modest proportion of future need.</p>
<p>Brownfield sites should always be first choice regardless of expenditure.</p>	<p>Suggestion noted – this equates to Option 1.</p>
<p>The green belt should not be developed at all and creeping development of the Broad Areas of Search is a no no. One of the main attractions of Epsom is the proximity of green open spaces and this includes golf courses, fields, playgrounds and of course the Downs. Better use/intensification of existing town centre/brownfield sites should be the primary areas of development. Use of empty offices, industrial sites and</p>	<p>Comments noted. National planning policy instructs local planning authorities to identify broad areas of search for housing. Equally, national planning policy is now clear that demonstrable housing need constitutes an exceptional circumstance for justifying the consideration of a Green Belt Review and release. The statement that the Green Belt is sacrosanct is misleading. The government has made it clear that housing need is an appropriate justification for triggering “exceptional circumstances” necessary to release Green Belt land.</p>

<p>even shops could be used for residential conversion. Any intensification of residential development should include more schools, doctors, local shops and transport and traffic management should also be improved.</p>	<p>The Borough Council agrees that future housing growth needs to be supported by an appropriate and proportionate investment in infrastructure. We will continue to work with our infrastructure partners to ensure that such investment continues to be made in the Borough.</p>
<p>I appreciate this might not be massively helpful, but for what it's worth, I feel politicians like Michael Hesltine are right when they say the United Kingdom needs to make a real effort to reduce its London-centric bias. Investment should be spent on other regions to make them more attractive places to work and live in. I know the BBC moving to Salford may not have made a huge difference to the Manchester economy, but giving areas other than London and the South East a boost has got to be the right way to go. Epsom and Ewell is now a busy urban area, which people of my parents generation maybe have a hard time getting used to. We all know the population density is going to get worse, and I know there is a big housing crisis, but taking steps to stop large numbers of people from other parts of the UK coming into the area should be addressed. That, obviously, is a long term issue, and I know I'm not offering any immediate or practical solutions. However, I wonder how on earth the borough is going to cope with another 30 000 residents in 20 years' time.</p>	<p>Comments noted. The Borough Council has some sympathy with the opinion on the need for regional and national planning. The Borough Council has made this position clear to central government as part of recent consultations relating to national planning policy.</p> <p>The proposal to manage who purchases new housing is beyond the scope of the Local Plan and runs contrary to our free market economy. Managing the nation's housing market to this extent would require a significant change in both government policy and society in general.</p>
<p>Firstly following Grenfell no to taller buildings full stop due to poor provision due to commercial short cuts. Secondly there are lots of small cluster opportunities in brown field areas to meet the numbers of housing required - it requires a more robust and smaller scale building options. I don't think you have fully evaluated</p>	<p>Comments noted.</p> <p>We have carried out a full assessment of potential sources housing land supply in the existing urban area. Whilst there are possible sources of supply within the existing urban area not all of these are genuinely available or deliverable during the local plan period. We will</p>

<p>cluster building options say 2-3 or 4-5 places in land that is derelict.</p>	<p>continue to explore all possible sources of supply but with the caveat that all sources will need to be demonstrably available and deliverable.</p>
<p>There should be housing for rent as well as housing for people at the bottom end of the market.</p>	<p>Comments noted. Our evidence acknowledges that the market rented sector has a role to play in responding to housing demand.</p>
<p>Epsom has already had many new homes built on the old hospital sites, increasing pressure on all infrastructure. Our primary need is for more truly affordable housing for local people and key workers. The Green Belt is part of the very character of Epsom, and should not be permanently lost for the sake of targets imposed by central government. Who would meet the costs of the additional infrastructure required for the proposed large increase in new homes? New housing also needs to be in character, unlike the flats above and opposite the train station.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>Any new housing should be truly affordable and meet local needs. There is no need for loss of the green belt and the Downs and the race course area should be protected as areas of beautiful landscape and views.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>We need more genuinely affordable housing to meet local needs. We also need to bear in mind that our roads and other facilities are already at breaking point. It is becoming evermore difficult to move around Epsom and Ewell because of overcrowding on the roads and fairly continual traffic jams. Commuter parking is blocking our thoroughfares. Whilst it might just be possible to accommodate more housing the infrastructure is effectively broke. Is there the money (and space) for the extra transport, road widening, water supply, sewers, and social, educational and health provision we will need? We need an holistic</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>

approach to the area not one just predicated on building more houses. It appears that no one is empowered to take such an holistic approach.	
No	Comment noted.
The borough of Epsom and Ewell is already seriously overcrowded. Whilst we need more affordable housing, what we really need is an holistic approach to the borough, so that the need for homes is balanced by a corresponding increase in road capacity, electricity and water/sewage provision, plus the other aspects which a modern society needs such as access to schools, education, health and GP facilities. We need someone to take an overall approach to the provision of not just housing needs but also the accompanying supporting infrastructure.	The Borough Council agrees that future housing growth needs to be supported by an appropriate and proportionate investment in infrastructure. We will continue to work with our infrastructure partners to ensure that such investment continues to be made in the Borough.
Any new housing should be affordable & meet local needs, with limited loss of green belt.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Any new housing should be affordable & meet local needs, with limited loss of green belt.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Surrey	The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms. Many neighbouring Surrey planning authorities face the same challenges that we have – namely, that they are heavily constrained by

	Primary Constraints and the Green Belt and that they have an insufficient supply of available and deliverable sources of housing land.
Limit buy to let's and owning more than 1 property	Comment noted. This type of intervention is beyond the scope of the Local Plan and would require the introduction of primary legislation by government.
Maximise re use of empty office blocks and redevelop under used commercial and industrial areas	Comments noted – our existing Local Plan policies already allow a degree of flexibility in terms of the conversion of vacant and redundant office floorspace and the upper floors above retail units to housing.
Any new housing should be truly affordable and meet local needs. Say No to the loss of greenbelt.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
There are many empty retail premises which could be converted to residential use, and restricting the number of charities in town centres which do not contribute significantly to local business rates would benefit the local economy. I do not believe the figures required for additional retail space, as much of this business is going online. There is an opportunity to increase density within high streets where small shops are no longer required, and allow taller developments with flats above to better use this space.	The Borough's local centres and shopping parades provide highly valued retail provision, which is accessible to the majority of the Borough's residents. Our adopted policy is resist proposals that degrade these centres. Nevertheless, they may provide opportunities for higher density development – above existing shops and commercial activities.
Any new housing should be truly affordable and meet local needs. No loss to Green Belt	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
The south east is way too populated, in fact if it gets any worse I will consider moving further away from London. Jobs and housing need to be less reliant on London.	Comments noted.

With Crossrail 2 coming, ask for all railways to be moved underground and use the area above ground for new housing.

Comment noted. The Cross Rail 2 proposal envisages an underground section that connects Euston with Wimbledon. The remainder of the south bound line, into Epsom, will be overland and will utilise the existing line.

No because I don't think there is a need for all these houses, this is a classic case of creating a phantom demand to then force supply, not one question on here offers the "should anyone who cannot afford to live here go and live where they can afford to" as I did when I was younger and I don't mean in a local borough, I mean in another county if need be, North Yorkshire was pretty empty last time I lived there. I didn't feel I had some god given right to live where I wanted, I lived where I could afford to. These supposed 20,000 people should do as I did and live in some of the cheaper parts of the country which actually have falling populations, before we start tearing up 70+ year old boundaries designed to prevent exactly what is now happening. What's next once the green belt is gone (which it will do if you start chipping away at it), National Trust land? Box hill? If you build it they will come, if you don't, they won't, they will go elsewhere, do not build it. There is no exceptional circumstance going on here other than what you or the government are trying to create. As for the belief that infrastructure, particularly transport and education as perceived by the planning inspector is not at breaking point, maybe that inspector should try living here and then try to get their child into their local school which is only 700 metres away, not get in and then end up having to drive through town every day to take their child to a

Comments noted. We have some sympathy with the suggestion that the government's calculations for future housing artificially inflate the scale of demand. Our response to the government's "Planning for the right homes in the right places" consultation included robust comments on the shortcomings of their proposed changes to our national planning system.

The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.

We share your concerns, particularly in relation to the apparent obsession to secure housing numbers, as opposed to planning for sustainable growth. Nevertheless. We have to work within the planning system that the government is creating.

<p>school 3 and a half miles away in another borough, as I do. This is before I have even got started on the traffic. I don't think it's at breaking point, I know it is, I live it every day!</p>	
<p>Move railways underground and use land above for new developments.</p>	<p>Suggestion noted. Unfortunately this is beyond the scope of what the Local Plan can presently deliver.</p>
<p>The provision of more social housing under Local Authority control.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>I'm probably one of the few people in the country who doesn't think we have a housing SHORTAGE! We certainly have a housing CRISIS, but in terms of bedrooms/bedspaces, there are probably plenty of them! Some time ago, I read that 50% of the 4 bed detached homes in the Borough are occupied by single people on their own!! I find this quite difficult to believe and totally staggering but have no reason to disbelief the statistic. I don't think we need any more 3 and 4 bedroomed family homes: millions of them were built in the inter-war and post WW2 years. It's just that people who buy them tend to stick in them indefinitely, well past the time when they are suited to their needs - in fact in many cases the house is an albatross around their necks being too large to maintain and heat and the staircase and garden in particular posing a real fall risk for the elderly. So what is needed is for National Government and Local Government to encourage a sense of social responsibility and motivate and incentivise older people to downsize, thus releasing family homes for younger people. But no Government</p>	<p>Suggestion noted. Unfortunately this is beyond the scope of what the Local Plan can genuinely deliver. It is noteworthy that the type of intervention (in property ownership) proposed is contrary to our established free market society. The government has provided no indication that it is prepared to make such radical interventions.</p> <p>The comments on affordability are noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>

<p>will dare to suggest this,since it is a 'political hot potato'! What we do need is an innovative range of housing options for retirees including apartments and bungalows on one level, and more 'starter homes' to enable young people to leave the family home, including studio and one bed apartments. These should be as centrally located as possible since elderly people need to have easy access to shops, GP surgeries and other amenities, and young people need ready access to transport links and offices. There is no need to cover vast swathes of the countryside with new houses.</p>	
<p>Expand towns Build tall buildings in the town Change building regulations</p>	<p>Suggestion noted – this equates to Option 1.</p>
<p>The provision of more social housing under Local Authority control.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>I am not seeing affordable housing being built. Instead 5bed detached houses, does not make sense. This should not just be a plan about housing the area is massively congested and more schools will be needed</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>No I do not trust the source of this information. Someone should have the guts to challenge it</p>	<p>Comment noted. We have challenged the</p>
<p>Any new housing should be truly affordable and meet local needs. Say no to the loss of Green Belt.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>

<p>Fill up empty houses. If someone buys one for investment and doesn't intend to use it they should be forced to rent after a year of it being empty. Divide the big houses into smaller ones and ask Elmbridge to do the same as I've seen a few empty ones in Oxshott. Ask people in large houses to rent rooms. It's unfair to have so much space when others don't. People working in the shops, cafes and restaurant in Epsom, the people who help keep the place alive can not afford your "affordable" homes, yet we need these people so please adjust the affordability (if a house is small it shouldn't cost an arm and a leg).</p>	<p>Suggestion noted. Unfortunately the proposed intervention is beyond the scope of the Local Plan. This type of proposal would require the introduction of primary legislation. To date the government has not provided any indication that it would be willing to consider such a radical approach. While this is a valid suggestion, the number of long-term vacant residential properties in Epsom & Ewell is relatively modest (in low double figures).</p>
<p>Houses already have permitted development to help with the housing crisis. You should have a policy to support the conversion of lofts to blocks of flats + on blocks which are flat roofed support a flat to pitch conversions.</p>	<p>Suggestion noted.</p>
<p>Look at unoccupied houses</p>	<p>Suggestion noted.</p>
<p>Do not allow building of luxury, high-priced houses. Make new houses more affordable. How can first-time buyers even consider some of the new houses priced at £1m+</p>	<p>Comment on affordability noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>Are there brownfield sites and previous industrial sites which could be used rather than green belt</p>	<p>Suggestion noted – this equates to Option 1.</p>
<p>Industrial and commercial premises to be converted to residential use.</p>	<p>Comments noted – our existing Local Plan policies already allow a degree of flexibility in terms of the conversion of vacant and redundant office floorspace and the upper floors above retail units to housing.</p>
<p>The amount of homes being asked for is not realistic, our transport links, schools and hospitals are already stretch to the max. There is also a major problem with affordable homes being built as developers</p>	<p>The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the</p>

<p>outmanoeuvre councils to build luxury homes for maximum profit without a single affordable house being built. Also reducing living space to a rabbit hutch space will end up making people feel like caged animals. There is no point looking at the Green belt until we sort what we have already.</p>	<p>right solutions in parallel to the delivery of new housing, employment and retail developments.</p> <p>Our existing policy approach requires that new residential developments meet minimum internal space standards. This is an important policy consideration for us, which we believe makes a significant contribution towards achieving sustainable development. We are not proposing any changes to this approach.</p>
<p>Attempt to move some businesses and council facilities outside the borough, without having a detrimental effect on business vitality. Convert declining retail space into housing space. Abandon the Kiln Lane Link aspiration and use the land and possibly some adjacent land for a large scale multi- functional development. Study station development at Stoneleigh , Ewell East and Ewell West.</p>	<p>Moving businesses and council facilities outside of the Borough will have a significant adverse impact upon our economic vitality and viability. This will be most acutely felt by our commercial and retail centres.</p> <p>We will explore the other suggestions to establish whether they could provide a meaningful contribution towards available and deliverable housing land supply.</p>
<p>Need to consider provision of other services, such as hospitals, schools, transport.</p>	<p>The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>
<p>consider container housing for young people / single people - see http://www.ymcalsw.org/home/our-centres/ymca-walthamstow/about-mypads/ talk to organisations like YMCA about how to meet specific housing needs of young people many of whom are struggling to become independent because of shortage of suitable accommodation - this puts a massive strain on families and impacts mental health of all</p>	<p>Suggestion noted. System and prefabricated construction techniques may provide a solution to speeding up the supply of new homes. However, our nation’s development industry has yet to fully embrace such innovations. We will consider such solutions where they are appropriate and necessary.</p>
<p>Sport England does not wish to comment on the council's options for meeting its current and future needs for housing. This is considered to be outside our</p>	<p>Comment noted – see Officer response elsewhere.</p>

<p>remit. However, Sport England is concerned that Epsom and Ewell do not have an up to date and robust assessment of its needs for sport and recreation. The 2006 audit and assessment does not represent a current and robust assessment of the borough's needs and is significantly out of date. Sport England would strongly recommend that the council undertake work to develop a Playing Pitch Strategy and Sport Facilities Strategy using Sport England's guidance, which can be found here: https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/. This will help to ensure that the council plans positively to meet the sporting and recreational needs of its current and future population.</p>	
<p>use brown field sites and allow as many flats above offices/ shops as possible.</p>	<p>Suggestion noted – this equates to Option 1.</p>
<p>I would not support extensive increases in density of the existing urban area or building on parks or green spaces with the urban area - as this would spoil the current town character. Instead I would prefer a review of the green belt land so that additional housing can be built on the edges of the town, where space can be found for schools, doctors, shops and green spaces within these housing developments. I would not like to see a situation where we end up with an extremely densely populated town with little green space, surrounded by empty fields. In my opinion the green space within the current urban area is of more value as it is easily accessible to the residents and gives a feeling of 'space' within the housing developments. I would however support some increasing of density in</p>	<p>Comments noted. We fully acknowledge that our open spaces and biodiversity positively contribute towards the Borough's special visual character and appearance.</p>

the urban area (particularly around good transport links) where this will not spoil the character or impact on communal green spaces such as parks.	
develop industrial sites to mixed use	Suggestion noted. While this is a valid proposal that we will investigate further. However, there may issues relating to the availability and deliverability of such sites that may prevent this being a short-medium solution to housing demand.
Truly affordable homes for local needs	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
A very high percentage of new housing must be truly affordable	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
industrial sites, warehouse locations, no higher than 4 floors, taller blocks are not socially cohesive or wanted/welcomed by the inhabitants. Low raised flats of 3 or 4 stories, with surrounding social/green space and parking underground, creates a good balance.	Comments noted – our existing Local Plan policies already allow a degree of flexibility in terms of the conversion of vacant and redundant office floorspace and the upper floors above retail units to housing. While this is a valid proposal that we will investigate further. However, there may issues relating to the availability and deliverability of such sites that may prevent this being a short-medium solution to housing demand.
Any new housing should be affordable, for people, especially young people who are from Epsom wherever possible and meet purely local needs. We are reaching bursting point here and you should stop letting development companies build expensive houses that no locals can afford whilst leaving the Green Belt intact wherever possible.	Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.

<p>Whilst I support Option 4 as the least worst solution to the provision of additional housing, I am not confident in the planning approval process displayed by the Borough in recent years, where ill-judged developments have been permitted, and policing of development has been poor such that conditions placed on developments have not been met. The Borough must improve its planning process. My selection of Option 4 must not be taken as giving the planning department a carte blanche to do what it pleases. There needs to be greater oversight and control. Areas where denser development could have taken place, and to a small extent still could, along East Street. Areas of the green belt which I consider provide least benefit to the community are the triangle of land between Longdown Lane South, College Road and Ruden Way; part of the Priest Hill open area; and part of Walton Downs.</p>	<p>Comments noted. Following a recent independent peer review we are already implementing an improvement plan that will bring considerable changes to our development management processes that will benefit decision making. It is noteworthy that the peer review process found our Local Plan processes to be exemplary.</p>
<p>compulsory purchase of excel golf courses for housing.</p>	<p>Suggestion noted. All of the Borough's golf courses are located within the Green Belt and any development on such sites would require their release.</p>
<p>compulsory purchase of golf course, to provide housing</p>	<p>Suggestion noted. All of the Borough's golf courses are located within the Green Belt and any development on such sites would require their release.</p>
<p>Investigate commercial land held by developers banking sites for future use that could be developed now. Compulsory purchase to be considered.</p>	<p>Interventions into land banking activities are beyond the scope of the Local Plan. Any effective intervention would require the introduction of primary legislation. The government has not committed to taking meaningful action on this matter.</p>
<p>Surrey</p>	<p>The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms.</p>

	<p>Many neighbouring Surrey planning authorities face the same challenges that we have – namely, that they are heavily constrained by Primary Constraints and the Green Belt and that they have an insufficient supply of available and deliverable sources of housing land</p>
<p>affordable housing for local essential workers and 5 year tenancies is h ass.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>Affordable housing needs to be provided for young people who grow up in the borough but cannot currently even hope to be able to afford to buy here given the lack of affordable housing. Local people need to be helped to stay in the area and also, infrastructure needs to be improved. We moved to Epsom when the hospital clusters were developed but the local public services have not been invested in to accommodate the thousands of extra people who now live in the Borough compared to 15 years ago. Epsom roads are absolutely full to bursting - only one incident on the road grounds the whole of the town to a halt. There are too many people driving across town and not adequate safe cycling routes across town for people to use. GP surgeries are overrun with patients - it is very difficult to get appointments. Schools are over-subscribed. These things are bad already so before you plan to house even more people in an already overcrowded town, the infrastructure needs to be invested in. Everyone who has moved here in the last 15 years has contributed to the funds with large Council Tax bills, but nothing seems to have been</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p> <p>The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>

<p>expanded on. The transport in particular and GP surgeries need more funding. If we are not careful in how we expand and plan for the future, Epsom and Ewell will not be a pleasant place to live. These issues need attention and it is the duty of the council to preserve the character of the borough and not ruin what makes it a great place to live. Please give more attention to how people move around borough - encourage safer cycling with investment in a cross-town cycling route. Get people away from the roads. The traffic congestion is spoiling the area - it is congested on a daily basis with more problems when an incident occurs. Please put limits on how many patients can be accepted by GP surgeries to enable those people already registered have access to a good service.</p>	
<p>Q 1 and 2 do not have a middle way or "Possibly" Box that would be my preferred response. To expand on Q1 my response "Yes but limited to four storeys to eaves height and max 45 deg roof pitch and that location be within the Town centres. For Green Belt please see Q9</p>	<p>Comments noted.</p>
<p>Get councils and housebuilders to renovate existing housing that is derelict, etc</p>	<p>Suggestion noted. However, the number of long-term empty or derelict residential properties is relatively low. Equally, the legal implications associated with the landownership of such sites, in n our experience, serve as a significant constraint to their availability as sources of supply.</p>
<p>While we support the development of urban sites, the Council should seek to meet its full OAN and release Green Belt sites to do this. On this basis, we support an approach which would appear to be in between Options 3 and 4.</p>	<p>Comments noted. We have been clear that we will seek to meet as much of our need as sustainably possible. Evidence is already demonstrating that there are insufficient available and deliverable sources of housing land supply to meet all of the identified need. Market signals are also showing that the development industry is</p>

	<p>reluctant to deliver the types of development that are necessary to significantly boost housing delivery. On that basis it is irresponsible to suggest that Option 3 is deliverable and corresponds to sound and sustainable planning.</p>
<p>We should be accommodating only higher density development to provide affordable homes. We should not be sacrificing green belt land, it is not sustainable in the long term.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>Much more affordable housing should be provided locally and nationally. Currently, in the UK, it seems developers who seek planning permission can easily avoid creating ANY affordable housing. An example of how this is done and a suggestion for changing this is given below. Policy CS9 of the Epsom and Ewell Core Strategy (2007) sets out that the Council has a target for the delivery of 35% of new dwellings to be affordable. Lidl UK GmbH (as other developers do) provides an example (in their Epsom Upper High Street planning application document "Affordable Housing Statement of March 2017) of how easily the affordable housing requirements can be circumvented. They have submitted a confidential "viability assessment" document to the council (not available for public scrutiny) "demonstrating" that providing affordable housing would make the development not sufficiently profitable and, therefore, Lidl can state "there is no requirement ... to make an affordable housing contribution". My understanding is that this secretive mechanism means most councils cannot and do not insist on developers providing affordable housing at the rates required. This could be easily</p>	<p>Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p> <p>However, we unfortunately do not enjoy the freedom of New York State – our Local Plan has to conform with national planning policy, which rightly or wrongly provides developers with an opportunity to negotiate the scale of affordable provision. We have recently made robust representations to government advocating the reversal of this approach. The government has not provided any indication that they intend to review their approach.</p>

<p>changed to the benefit of the UK house buying market. New York City has taken the simple and effective approach that if a developer cannot afford to provide the affordable housing requirement, the developer's plan will not receive permission. The result in New York is that affordable housing is created at the rate set by the city. Our local politicians should urge the UK government to adopt a similar approach.</p>	
<p>No more overpriced "luxury apartments" for people selling up in London and moving out. New housing in our borough should be affordable to local residents and meet local needs. New housing - whatever the quality - means more people. More people means we will need more schools, play grounds, hospitals, GP surgeries, dentists, (sooner or later) old peoples homes, police, rubbish tips, parking spaces and - last but certainly not least - more roads. What about commuting and travelling ? Already today it is difficult to get into and around Epsom (example: East Street is a bottle neck) Another 20,000 - 30,000 people - it will probably all grind to a halt.</p>	<p>Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p> <p>The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>
<p>Some minor adjustments to the Green Belt boundaries would be acceptable to accommodate some additional housing development possibly including additions. However the extent described in Option 2 is unacceptable. Allowing air-rights development over the railways if these would be viable. In addition to town centre and near station locations relax height restrictions on previously commercially developed land adjacent to railways.</p>	<p>Suggestions noted.</p>
<p>Any new housing should be truly affordable and meet local needs. The green belt is sacrosanct and once</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of</p>

given up can never be retrieved. Don't touch the green belt at any cost.	social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.
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Taller developments to minimise land lost, review of unused brown field sites to housing. Adapt unused retail units and office blocks to housing. No loss of green belt.. it is this that makes Epsom and Ewell a brilliant place to live and is vital to maintain the health of the population and minimise obesity and other health problems,	Suggestions noted – these equate to Option 1.
terrace houses	Suggestion noted – terraced housing may, in appropriate locations, provide a higher density solution to this issue.
I would support several of the suggestions already stated	Comment noted.
All brown field sites should be reviewed - any that are not being used so be compulsory purchased, there are a number of retail areas which are not occupied which could be converted / rebuilt as housing. More high rise flats should be added in the centre of epsom town centre. All currently council housing areas should be reviewed to maximise each area and the numbers it could hold. (is it more cost effective to build blocks instead of terrace houses/ estates. As a comment box wasn't added i will state my point here - it is all well and good attempting to find land for housing, but you can't consider new housing as a single issue, you must consider the effects on transport, schooling and healthcare and finding the areas for these at the same time, it can't become an extra issue further down the line because it makes the question to hard. its is much better and cost effective to take the time to work	<p>Comments noted.</p> <p>The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>

<p>though the problems in one. Otherwise you will end up with a couple of thousand houses and one facilities for those that are living there.</p>	
<p>Build over shops and superstores.</p>	<p>Suggestion noted – this equates to Option 1.</p>
<p>The definition of housing need should apply to Local Needs only and not to allow for migration from other areas. There should be no loss of Green Belt land. Future houses built should be at the smaller end of the scale to ensure adequate numbers are built on each piece of development land and to provide affordable homes to local residents.</p>	<p>Comment noted – unfortunately we have to prepare our local plan in accordance with national planning policy which requires that we consider need within a wider context. Our SHMA provides a robust and thorough assessment of need across our housing market area.</p>
<p>The Green Belt should absolutely be protected. It is fundamental to the character of the borough, especially the Downs and the Common as well as the views from the Downs. There needs to be an emphasis on truly affordable housing - we have sufficient larger properties in the borough. Also the emphasis should be on housing nearer the centre of the town to take advantage of the existing infrastructure and services.</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>
<p>Any new houses should be affordable and for local residents & local needs</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.</p>

<p>No loss of green belt</p>	<p>Comment noted.</p>
<p>Understand that there is a clear difference between housing need and housing demand. I have read all the documents presented and none of them to me give any evidence at all that there is a need of this size in Epsom and Ewell. There are not thousands of people living on the streets in this area. There has not been a natural disaster which means that half the country is uninhabitable and so mass migration is required. What has been presented in the papers is a demand - people would like to live here, they don't need to live here. There are lots of areas where there is plenty of housing available and it is more affordable. All that boosting supply to this extent will do is to boost demand. The extra 20-30000 people in the next fifteen years will then further fuel exponential population growth after that. Looking at the Government's consultation document one of their stated objectives of this house-building is to reduce property prices and that the number of houses to be built should be more than projected population growth to achieve this ie again this is about demand rather than need. Your document even concludes that the house-building proposed for this area will not meet this objective, so why do it? Action should be taken to address the unsustainable population growth in the South East when other areas of the country are shrinking. The reasons for such high levels of migration should be addressed. Investment should be directed to infrastructure, employment and transport initiatives elsewhere (eg the Northern Powerhouse) to encourage the population to "spread out". Sales of new (or old)</p>	<p>National planning policy requires local planning authorities to prepare local plans on the foundation of evidence. One of the key pieces of evidence of our Issues & Options consultation is the SHMA. We are required by national planning policy to prepare our SHMA in a very specific way – so that it provides a projection of our objectively assessed housing need, or as you correctly identify housing demand. If we failed to do this we would run the high risk of our Local Plan being found unsound.</p> <p>We have some sympathy for your views. The Borough Council has made very robust responses to the government's changes to the planning system – specifically those relating to how they believe local plan authorities should plan for future housing growth.</p> <p>Nevertheless, national planning policy is challenging us to respond housing demand. We cannot simply say that the Borough is full and infrastructure cannot cope.</p> <p>Failure to meet national planning policy may lead to government directly intervening in how we plan for the Borough's future needs. It is more likely to result in ad hoc planning, promoted by predatory developers via the planning appeal system.</p> <p>The Borough Council agrees that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p> <p>We share your concerns, particularly in relation to the apparent obsession to secure housing numbers, as opposed to planning for</p>

<p>housing stock to foreign investors who neither live nor work in the UK should be banned. The owning of second homes (not rented out) should be made unattractive. I acknowledge that there is some need for additional housing (though not to the extent proposed). Any building that is carried out should be to address the local need only, it should not be to encourage migration or to make large profits for the developers. It should be directed primarily to brownfield sites and urban areas. I understand that the majority of the housing needed is affordable. It then makes sense for much of the building to be flats with smaller room sizes (as by definition these are more affordable) and the sharing of accommodation should be encouraged (as is the norm for people below the age of around 30 in the private rented sector). Only after all urban/brownfield sites are exhausted should the greenbelt be used. Green space is essential for mental health (which appears to be a hot topic at the moment). There may be some areas of the greenbelt that could reasonably be considered, but this would set a precedent for future changes. Just one bit of greenbelt now ... just another ... just another ... where would it stop? Extensive use of greenbelt at this stage should definitely NOT be considered an option.</p>	<p>sustainable growth. Nevertheless. We have to work within the planning system that the government is creating.</p>
<p>Consider the issue of housing occupancy fraction -- how to encourage or incentivise people to downsize. Conversion of existing unused office space into flats.</p>	
<p>Focus on affordable housing which will have higher density of homes so less building land needed</p>	<p>Comments noted. Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been</p>

	to respond to this and secure as much affordable provision as possible within the constraints of development viability.
Review existing retail offer in Upper High Street with a view to provide a high density mixed used (office space) for knowledge based industries to support centre of creative and digital arts etc	Suggestion noted. Our existing policy approach is sufficiently flexible enough that it would allow this to happen. However, the Borough Council may wish to take a more proactive approach, as a landowner, to this type of solution. We will explore this suggestion further.
Brownfield sites - such as ex-industrial or areas without character	We continue to explore the potential sources of housing land supply that might be available and deliverable and located within our existing urban area. It must be noted that the potential opportunities for redeveloping former industrial areas are limited.
Just say no. Why ruin towns when there are endless amounts of empty house up north and in other areas.	Comments noted.
Why not just use the council building and make yet more flats in Epsom! At least some use may come of the site unlike our useless council. Epsom has enough flats, the towns infrastructure can't support the people you are trying to cram in. It currently takes 6 months to drive through it! Why not evict the travellers at kiln lane and build flats here! That's a solution and would also reduce crime evicting them. But no the council is not strong enough	Comments noted.
A balanced approach should make best use of sites in the urban area subject to no adverse harm, while at the same time making the most optimal use of land in the greenbelt but on the edge of the settlement to accommodate new housing and commercial development. This would potentially free up under-used commercial land in the built up area for much needed housing which would be a more sustainable approach. maximising densities in urban areas would also assist in delivering much needed housing	Suggestions noted – we will explore how these suggestions will contribute towards meeting our needs.

<p>provided that this can be delivered without causing harm to the character of the settlement. Higher density development within town centre locations and close to nodal transport links should be encouraged.</p>	
<p>Clearly first choice is to make use of all available housing sites incl. brownfield and windfall areas. A review of the Green belt is appropriate after the period of time since establishment, but the default position should be to retain the area. There must be a balance achieved between increased urban density with open spaces however, and playing fields must also be preserved as part of the infrastructure. Perhaps the nature of the housing could be addressed in some areas ie. where there is a predominance of large detached properties eg. as on Cheam Road by East Ewell Station, and rebuild with a greater number of smaller housing with smaller gardens. There is scope also in village high streets where businesses are closed - as superstores established elsewhere. Higher density of residential property there would re-vitalise high streets and support the 'service shops' remaining.</p>	<p>Suggestions noted – we will explore how these suggestions will contribute towards meeting our needs.</p>

Appendix 2: All Responses to Question 9 – Suggested sites and/ or locations for development

Suggested Site/ Location
Priest Hill had had development around its fringes , it is a large area that is seldom used and would give us a long term option for more housing for many years to come. The industrial estate where the Council dump is situated should be redeveloped for housing , the waste site could be merged with another Boroughs. Horton Park Golf Club is another prime site for redevelopment.
Just definitely not WEST EWELL, we have had the majority of developments here, enough is enough....go out towards the top end of Epsom, or do the residents there cause too much fuss/noise.
Review current businesses in town centres and target empty business locations with rate free period. Review large business locations near town centre eg Atkins and create hubs on outskirts/ green belts and reuse existing central sites Easy town centre traffic.
Epsom and Ewell has seen so much housing development and it's a shame completely unrealistic targets are being set. If I had to suggest areas places like Horton Farm and the land that spans between Hook Road and Horton road (not Hobbledown/Horton country park) has little benefit as 'green belt' not usable for public or beneficial for wildlife. Any development should have a traffic survey to prevent pollution and accidents. Essential services are dwindling - schools, Dr's, etc
KT190NG
Around Horton
Further development on east street. Regenerate nicer areas around longmead estate.
Reigate road site, p52. Hook road arena site.
There is quite a gap between Ebbisham and the Wells along the railway for example and I do wonder if there could be some development here. The infrastructure in terms of schools is lacking in this area but it is close to the town centre. We need to review all these green spaces to balance the need for a wildlife corridor with the need for housing.
I THINK THE TIMING OF MY HOUSE AND LAND AND THE OTHER LAND OWNED BY OTHERS MAY ONE DAY IN FUTURE PLANNING BE USEFUL TO YOU. WE ARE IN OUR SEVENTIES AND WONT LAST FOREVER!!
The gas holder site near to Hook Road is suitable for development,
Aim to preserve some or all of land adjacent race course, otherwise character of borough altered completely
Above existing shops and car parks
Hook Road arena is a massive area, even if 90-95% of that was untouched, could the remaining 5-10% be used for development purpose?
Upper High street vacant plot
KT18 5JL

I moved to the area for its green spaces and low rise accommodation, I sincerely hope that Epsom and Ewell maintain its semi-country feel over the coming years.
Some areas around Horton. High quality infrastructure could handle additional low / medium density developments.
Around the hospital, area near Tolworth town centre and intersection with A3 would benefit from developing and would be a good alternative to other areas.
the council should identify locations suited (visually and in terms of achievable infrastructure and amenities) to medium-rise development, and begin purchases to stitch together these medium-sized development areas to deliver the required housing units over the next 15-25 years. Run-down areas just outside town centres would be easiest. Some will partly encroach on existing areas of employment and retail, but such enterprises have changing spatial needs in the digital age. Developments should have mixed tenure, mixed housing types (low-rise, detached, apartments) and high-spec amenities operated and protected by residents' Trusts. Developers should include housing associations, larger and smaller private builders, and the Council itself (esp for sheltered housing) under the direction of an arms length Borough Development Corporation tasked with X habitations self-financed over its 30 years existence, but with no uncompensated "decanting".
Hollywood Lodge, Horton Lane area (nothing happening with it for years) could be a cluster of starter homes/flats (low level)
I would say West Ewell Allotment site and Hollywood Lodge.
A) The site Lidl currently have ownership of on upper high street in Epsom. It would be wise to allow Aldi to build their proposed store in place of the derelict dairy site as they have put forward plans that are accommodating to the housing crisis. The Lidl site is larger therefore more houses could be built here, possibly high rise flat developments. It is crucial to maximise brownfield development before even considering building on greenbelt land. B) The green land on West Hill adjacent to Wheeler's lane. This area seems to serve no purpose and there is a park nearby and Epsom common so it would not severely affect the amount of green land in the area. C) Moderate height flats in the car parks in Epsom - some to consider would be the one between TK Max and Station Approach, the one opposite the Health Clinic and Fire Station or the large seemingly linked one between Depot Road and Pikes Hill. Building on car parks would not only increase the housing in the area but it could also deter people from driving into the town centre and adding to the already atrocious congestion. More bike racks could encourage people to cycle into the town centre thereby increasing the health of the local area. The only parking available should be for disabled people who require access. More yellow lines could be used to deter people parking in other places. Flyers with bus routes into town or safe cycle routes into town from various parts of the borough may also be useful to people. This could be a step towards not only a town with more housing but also a more environmentally friendly town with a healthier population.
No.
Part of the Longmead should be redeveloped into nice new homes instead of offices
no, but consideration should be given to the infrastructure of Epsom and Ewell as it cannot cope with the current population.
Build (on stilts) on Upper High Street and Depot Road Car Parks, or incorporate multi-storey car park in plans.

No
KT18 7QT
see above.
There is an area of scrubland, former allotment, by the railway line near Portland Place that is not used for recreation and is unkempt. Is it feasible to develop this? The site acquired for a Tesco close to the Odeon is huge and an eyesore.
Low rise commercial buildings on Chessington road, Ewell, Epsom town centre etc should be redeveloped into high rises for mixed use. The current playground between Chessington Road and Parkviews could be moved to Hook Arena (side nearer to Parkviews) and the playground area turned into one or two bedroom flats. Other areas where playgrounds are very near green spaces, should consider moving the play grounds into the green spaces and release the current playarea for housing. Would like to see Hook Arena remain a venue for community activities if possible as there does not seem to be another suitable venue that does fun fairs, fire works, boot sales etc.
I think a limited amount of green belt land should be used if it is needed for social/council housing. The infrastructure needed would be expensive and could be shared with neighbouring authorities if we planned things together. This social housing should be built with stipulations that it can't be sold on- it is quite wrong that we have no council housing for those in need of same.
None, too much overdevelopment already.
The Mill - previously occupied by Rawlinson & Hunter, would make a good site
My heart tells me greenbelt land should not be used, but my brain tells me perhaps parts of it have to be. Having had a daughter who was born and bred in Ewell who had to travel to Thornton Heath for 8 months with her family to very unsuitable conditions before finally being housed on the new Noble Park estate, I realise how difficult it is for families, but I think that priority should be given to people from this area before bringing in people from elsewhere.
Mill site Kingston Road, Ewell Edge of Nunsuch Park, would give new residents access to green space where gardens are likely to be at a premium.
Kiln Lane area, West Ewell industrial parks
No. I would like to see the nature of the borough protected for existing residents - the reason we moved here is it's green and not over developed. London and Surrey neighbouring boroughs need to be part of the solution. We also need to make sure that any extra provision is for local families and not encourage more people to move into the area.
Area behind Linden Bridge school and the Hogsmill pub. Industrial area opposite the Hogsmill pub and along the Hogsmill River on Old Malden Lane. Burnt out empty houses are not pleasant along Old Malden Lane. Parkers field close to St.Mary's church on Royal Ave. Field behind the Scout hut on Salisbury Road. Noble Park House is a large area for redevelopment. Please don't build on our local parks including Non Such Park, Shadbolt Park and paddock and Auriol Park and the Barn Elms allotments.

Behind Linden Bridge school and the Hogsmill pub where the old Worcester Park House and stables were. Opposite this in Old Malden Lane on the industrial site which is not well used an an eyesore with empty burnt out houses. Parkers field on royal ave. Field behind Scout hut on Salisbury Road. Noble Park House imon the corner land is a large area.
Area at the Wells Estate on left as you go over the railway bridge.
I think it is inevitable that Epsom will become a domicile town,to deal with this without producing unwanted urban sprawl ,areas used for industrial and office use should be converted to domiciliary use.This will involve people having to travel out of the borough to work,but this is already the case for much of the local population now.
There is a building at the junction of Horton Lane and Christchurch Road that has been empty for decades. It's a large building with land around it.
Hospital cluster where land available .
Priest Hill is the ideal development area, there is a huge amount of empty space available with main train connections at East Ewell station and good road network connections to the A3 and M25. This WOULD however require a new schooling facility, as the areas schools are already way over subscribed! Also the large area of greenbelt along the A240 Kingston bypass towards Tolworth could be developed, alongside parts of the Barwell Industrial estate. Again school facilities would need to be provided. Charrington Bowl area and the land Tesco no longer are developing are also ideal, being left derelict for many many years now.
Area to NW of the council - near Chessington etc. Area bounded by Horton Lane, Chantilly Road and Hook Road
Derelict land along Wilmerhatch Lane/Headley Road running from Pleasure Pit Road to the stables on Headley Road.
scrubby land north west of Chantilly way through to Hook road and Horton lane
No.
I'd like to see the RAC and Epsom College gives up some of their land. Their affluent students/families/members pay a high premium for their land, yet the access the rest of us have to parks and green space is under threat. I do NOT want the public parks to go, nor any of the green belt. Alternatively, how about reducing down to one golf club in the borough?
I live in Miles Road and the new development on the old Linton's Lane site has been really positive. How about doing the same in the area opposite that behind Stones Road/Farriers/Kiln Lane?
Manor Park, Livingstone Park, Hollywood Lodge.
There are several unused office buildings around East street that could be converted to flats.
Certain parts of Priest Hill
KT19 8FU
The old gasworks next to the rainbow centre, More tall buildings near Ewell West station. Increase number of services from Epsom Downs/Tattenham Corner stations to attract more development and reduce the burden on Epsom town centre for new buildings

Upper high street where there is derelict land. We dont need another supermarket there. If we lose the greenbelt then Epsom loses its unique character.
I would question whether the event at Hook Road Arena could be accomodated at other sites in the Borough and that site used for housing.
KT17 1LL
Old pub site on Ewell by pass/London Road junction Dairy site and Upper High Street (formerly Iceland)
No loss of green belt. Use development sites for housing rather than commercial(e.g. Old dairy/upper high street Epsom). Develop industrial estate. If taller buildings required, develop these alongside other taller buildings in town or towards north of borough closer to Sutton or places with taller buildings.
The land in Court Ward between Hook Road and Chantilly Way (Horton Farm)
Would prefer green belt to be left untouched as once development starts there, it will be difficult to block further development on it.
All sites that have been derelict and blight the area -see above.
Any loss of the Green Belt must be avoided especially as Epsom and Ewell is on the cusp of the Green Belt and creeping urbanisation.
Burgh Heath junction with A217
Old office blocks and any old brown field sites.
Sites adjacent to Kiln Lane, Epsom where there is empty land at the back of the Wilsons site. Development of Epsom High Street - many of the upper floors of retail premises look from the outside to be unused or under used. Build attractive in-town dwellings in these upper levels. Epsom gas holder site next to Rainbow Leisure Centre.
As above and the site in the Ebbisham centre that used to be Virgin active health club - It`s been sitting empty and unoccupied for so long.
Build on existing brown field sites
An empty site beside the car park on upper high street that has been empty for years. The current flat car park areas should be built on top for flats. The empty Organ Inn site in Ewell. Unused office space should be converted in to flats.
Upper High Street? We do not need any more supermarkets!! Kiln Lane?
KT19 8LF
Upper High Street site could all be housing. Fire station and ambulance station could locate together freeing up one site which could be high density or both could be redeveloped and a new emergency services fire/ambulance/police station built on the former mental hospital land sites. Old dairy site should be housing.
KT17 4NA

The Green Belt is so precious and experience would suggest that developers are rarely sympathetic. However, if it really would 'show willing' (which I sadly doubt) to identify some land for development, then I would suggest the site of the demolished clubhouse and tennis courts on Priest Hill which runs parallel to the railway at Ewell East Station. A reasonable number of affordable housing could be accommodated with limited intrusion (one house would be affected). My concern is the lack of control/authority the borough council has to restrict development once a precedent is made.
KT17 4NH
Site of old Tesco in North Cheam
The playing field behind Epsom and Ewell high school.
Land between Nescot and Drift Bridge, land behind Northdown Lane North and South which I believe isn't green belt Land between Tolworth and Barnett Wood Lane, again I believe isn't green belt
Above railway tracks, on the hospital car park, or Sainsbury's car park Above car park in shopping centre
Priorities derelict land or houses that are obviously unoccupied before your build new ones.
epsom downs
KT17 4HT
See comments above - if the public are to be consulted on anything, I feel it should on the options to realise a properly planned, infrastructure supported, garden village in the locality that will work for this and future generations.
The large site off Hook Rd previously gasometer Green area in Rosebank Green areas at Watersedge
Utilities site East Street. Existing vacant 'large retail application' sites (Organ Inn, Upper High Street, Old Dairy site) to be renegotiated as smaller local shopping outlets with much higher level of housing.
Existing fallow land in an around some of the new hospital developments e.g. West Park (Hollywood lodge area)
Gas works East Street Stables in Burgh Heath Road Low rise in Epsom College fields adjoining College Road
KT185JD
Any new housing should be truly affordable and meet local needs. NO TO THE LOSS OF GREEN BELT
KT19 9BU
TK Max can be redeveloped . Wonder HD re - development immediately north of Epsom station . Develop areas close to railway line in the area behind former the Staples . Redevelop the Upper High St car park and police / fire station area - provide housing and new waitrose supermarket .{ Relocate the fire station somewhere else in the town - East Street? ?}. Provide a new multi story carpark closer to main shopping area [many car parks are currently poorly located - could the under used Hook road car park be redeveloped for housing and/or re-sited closer to the centre ?]. The "Green" areas around the redeveloped hospital sites serve little function in GB terms or for recreation and could be developed for housing if done sensitively . If they are developed , a proper Horton centre with a large supermarket and community facilities is needed plus

better transport e.g. explore a rail link from Epsom station to the Chessington via loop and provide Horton station as part of Crossrail 2? There is likely to be large scale development in south Chessington so why not plan comprehensively to get the best result for Epsom?. Any new major housing at Chessington might support the town economically IF it is accessible to the town by both car and bus or rail]. Explore a road link from Horton across the common to bypass town which is too congested, still not pedestrianised anywhere and very polluted/noisy. [This might provide also a new "defensible" GB boundary to the town's urban area]. Current development on the former hospital sites is very fragmented. Pinch points exist to the west of the town to the town centre [e.g. railway bridge in West Street and at Fair Oaks Lane /A243 junction - the junction still not working despite expensive recent "improvements"]. There is also need to improve and to create better car and public transport access from the hospital sites area to the town - it is too far to walk for many. A public park [not a countryside park] is needed too. The creation of new bypass to the town centre from the Wells area is needed to relieve pressure of traffic in the town as part of a more radical comprehensive plan. {this new road should be used to provide a defensible GB boundary to the west Urban area. Housing development in Epsom must be located to support town centre functions and shops. The town is under pressure and I fear major stores could close as shoppers go elsewhere. In other words think bigger and long term. [Any solution must provide the basis to plan for the next 30 - 40 years not eh next 15 or 20]. Tinkering here and there isn't "planning" its damage limitation. I understand why the hospitals were developed as they were but the solution was very sub optimal. The town's housing, environmental and retail problems are now such that a minimalist approach will not longer work effectively to secure sustainable future and provide affordable housing [the latter will may well be easier to provide as a GB development or via studio flats in converted offices]. These are all just ideas to consider but now is there time to do so

KT17 3BL

East Street gas works site. Area to south west of Reigate Road and North of College Road. Area to South East of Atkins site, the west of Ashley Road and East of Chalk Lane. Opposite Durdans Stables. North West part of Epsom College Sports field.

What about the eyesore of the old pub "The Worcester", near Worcester Park station - for starters! Just out of our boundary, I know, but give Kingston Council a nudge! And, as a general comment, I would hate to see any of our parks encroached upon. With such high pollution levels in this area we need these green lungs for our children.

Land at Priest Hill

The proposed Aldi site where the old dairy was

Hook road arena and Longmead estate. Further development around Nescot.

Promote the idea of building a new town with the appropriate infrastructure somewhere flat and accessible some 50 miles north of greater London.

KT199ER

KT17 3HE

My perception is that the undeveloped open land between Horton Lane and the borough boundary does not attract many walkers or other users and should perhaps be prioritised over, say, the Downs or the Common. The area between Reigate Road and Banstead Road is maybe in that category also: much of the farmland there is not obviously in productive use. The land south of Northey Avenue is somewhat derelict, though I am aware that it is partly a nature reserve. Other than that, perhaps a street-by-street survey of possible infill sites might be useful: some of the older parts of the borough have been developed rather haphazardly and there are gaps which could maybe be filled. But I imagine all of the above has been considered already.
The "Organ" site (Ewell by Pass) The Lower Mill site (Ewell Village) Park keeper's house (Nonsuch) -all uninhabited
DO NOT INFILL BETWEEN HOUSES AND BACK GARDENS WHICH WILL CHANGE OUTLOOK OF AN AREA.
No loss of Green Belt.
The former Organ Inn site on London Road has been empty for years. It is time this was compulsorily purchased and used for housing. The Priest Hill area (parcels 40 and 44) may be an option but it important to preserve sporting facilities in this area.
There appears to be additional land around the old hospital sites that could be developed whilst maintaining the green spaces of Epsom Common and Horton Country Park.
The land of planned golf course adjacent to Reigate road
Hook Road Arena. Priest Hill
Horton
Areas along the Ewell Bypass may be most suitable for some high-rise development. Development on green belt land could in particular be permitted if it improves the racing industry. I question the need to increase retail space when so much existing space is charity shops. We need a baker, a fishmonger, and the ability to park outside briefly to do some shopping-- like in Ashtead, where many Epsom residents go to do their shopping. Please make sure that affordable housing isn't "cheap" housing. It should be high quality, well designed and pleasant to live in. We need more, and safer, bike lanes. If people could cycle and feel safe, and be comfortable for their kids to cycle, there would be significantly fewer car journeys.
Part of the hook road arena which appears to be woefully under used
Hollywood Lodge
Former Police Stn.
The old shops, flats & the old public house site in Hollymoor lane
KT17 4JJ
KT17 4NF
KT18 6HQ
KT18 5JD
land oppoiste epsom common near the old hospital cluster

None that I have a knowledge of. I would support any areas of the Green Belt to be looked at carefully which WS Atkins highlighted in their Feb.2017 report that scored lowly in their aggregated summary heading. I would also comment that the housing target given to the Council by Central Government is not in my opinion based on any realistic assessment relating to this Borough and appears merely a figure plucked out of thin air. This Council has already made a major contribution to the housing needs of the area in recent years with the new housing provided on the footprint of the former mental hospitals in Epsom. One of the problems is that when it comes to planning it does not take account of the infrastructure to support developments like new and improved roads, schools, access to medical surgeries and schools. Epsom and Ewell would have a desperate need of these with any large scale developments.

KT4 7JJ

Ashstead

SM3 3PT

Old dairy Alexander Road. Church Street Police, Ambulance station and Health clinic plus two clubs opposite which are under-utilised. 'Tesco' site in Upper High Street. Priest Hill area. Defunct gas holder site near the Rainbow Centre. Part of Hook Road arena. Part of Horton Golf club.organn Inn site on A240.

I don't believe we need both an Aldi and a Lidl store on Alexandra Road. One area should be allocated to housing. Car park in Upper High Street is only full on Saturday and I don't think all the space is needed. NCP car park next to the old gas plant is also rarely full and is close to station. Could it not be compulsorily purchased and re-developed? Car garage space occupied by Sainsburys (Wilsons) also looks far too large given the housing pressures in the area.

KT18 5EP

In the Epsom area, an example would be the area around the derelict Hollywood Lodge, near Christ Church. This is an unused eyesore and could readily be redeveloped. A few nearby areas to Hollywood Lodge also seem suitable for development. There are also some areas around Hook Road which are little used and not especially attractive. A few areas around the A217 dual carriageway out to the M25 could also benefit from more development and may offer more affordable housing. In terms of helping other areas, those in Greater London tend to have different housing configurations, ie more apartments and terraced. Those areas further out of London are similar to Epsom with undeveloped areas of their own. Looking around inner Surrey, towns such as Cobham, Esher, Oxshott have a high proportion of very large houses, with large expanses of green belt in between, so less density of people in a given area than Epsom.

The area around Hollywood Lodge, near Christ Church Road

Hollywood derelict sight

Any new housing should be truly affordable and meet locals needs. No to loss of Green Belt. It is NOT necessary

Land at junction with Cheam Road and Ewell By pass, empty office buildings generally.

We have submitted The Downs Farm site (College Road/Reigate Road) within the Call for Sites.

Many unused, I.E. "To let" offices in East Street, can they be converted? When commercial land similar to Junct Ewell by-Pass & London road, the old diary site in Alexandra road ect becomes available, use these for houses and not for more of what we already have. Offices, Supermarkets ect.
consider using industrial sites or hook road Arena area
Atkins Recreation Ground Land between Horton Lane, Chantilly Way & Hook Road (green belt, but few trees or public spaces) Upper high st. car park (with new underground car park). Epsom gas holder station
kt4 7lp
Designate old 'Dairy Crest' site in Alexandra Road, Epsom, for Housing development only.
Yes and the site has previously been promoted in the Council's call for sites. The site address is as follows: South Hatch Stables Burgh Heath Road Epsom
Gas works site
SM7 1HE
Land to the rear of 29 East Street, Epsom KT17 1BD (see call for sites response PLG50296178).
There are plenty of empty looking building inside the epsom centre. everyone works in central london anyway.
Priest Hill. Old gasholder site near Hook Road. The site taken by Tesco in Upper High Street. Some of Hook Road arena site.
Retail sites at Kiln Lane - see above. Epsom Hospital - see above. Stoneleigh Broadway - possible area for selective intensification Junction of Ruxley Lane and A240 - see above - possible area for selective intensification.
East St.
Not really There are some areas of green belt that are already developed (e.g. hospital sites) where some extra housing may be possible without much detriment to either the existing housing or the green belt. There are obvious sites in the centre of Epsom (Upper High St/Depot Road, Hook Road gas works, etc.) where housing and commercial/retail development are clearly needed. In particular the acres of ground level parking seem an incredible waste. However I believe development is already planned, eventually.....
Brownfield sites are a prime target - If the buildings on such sites are not of historic interest, replace them with modern efficient properties which give people easy access to the town and amenities and without introducing more traffic congestion and pollutants in the air.
The area between East Street and the railway - no need for gasometer anymore
KT18 7DT
No site in particular, but perhaps encourage/promote the demolition of larger properties to be replaced with smaller units.
Hook road arena and hospital cluster site. Empty office buildings.

Derelict commercial buildings - for example The Worcester Park pub site across from the Worcester Park station and the huge monstrosity on the corner of Cheam Common Road and London Road (A24). The open, unused area behind the Scout Hall on Salisbury Road in Worcester Park.
Propose derelict Hollywood Lodge, near Christ Church Road as a suitable site for building houses
Epsom Town centre has a number of areas on the High Street and South Street that could be redeveloped. The Old Dairy on Alexandra Road is a prime spot for change of use for housing as it sits in a residential area. The empty office blocks on South Street could be converted to flats and there are numerous shops on Upper High Street and High Street that haven't had worthwhile long term tenants for years and are just used for charity shops, seasonal popup shops or left empty.
Further to answer above in Q8, Brown Field sites would include the former Express Dairy and the old Government Training Centre near the old gas-holders. There are numerous "higher rise" opportunities within the Borough, for example Longmead and Kiln Lane.
KT17 3HD
I'd change the law to prevent land-banking so that the Council could build on the three sites currently surrounded by blue fences. old hospital sites?
If you HAVE to build on the green belt then extend the built on areas around the old hospital sites
KT18 5LU
Land to the right hand side as you drive from the end of the dual carriageway towards Ewell west station.
Mid Surrey Farm. Malden Rushett.
SM2 7LU
The land surrounding the derelict Hollywood Lodge near Christ Church Road.
Current agricultural land (e.g. south of Cheam Road, Northey Avenue roundabout). Plot west of Reigate Road & north of College Road
My husband and I could not afford to live here, where we grew up ,when we first got married so we moved to a cheaper part of Surrey, saved hard, made sacrifices and moved back when we could afford to. Do not develop on our green areas of recreation which help us to improve our well being, reduce obesity, keep healthy, exercise and save the NHS money.
KT173BB
Car parks should be underground. Build large developments of affordable housing on town centre car parks, where the bottom two floors are retained as car parks and housing is above the car park on multiple floors.
Hollywood Lodge and land
The upper High Street site could be good for apartments, with underground car parking. Ditto the Old Dairy Site. We don't need more supermarkets. You could allow more backland development in established housing areas nearer the town. These are accessible to the town centre without the need for expensive buses.

<p>Although, I responded 'No' to general question 2 above re Green Belt, I think part of Priest's Hill could be freed up used for house building, with appropriate screening from Reigate Road. This area is convenient for Ewell East station. The change in road usage for the Nescot CarPark has affected the general characteristics of the area. I walk in the new Nature Conservation area, but find it the least attractive of our public spaces, so would sacrifice the area south of that, first. Part of the RAC Golf Club backs onto Pine Hill, maybe some land there could be compulsorily purchased; golf clubs while offering opportunities for sport and socialising are harmful to the environment and waste water at a time of climate change. Maybe free up some green belt between mental hospital redevelopments. Hook Rd arena and Chessington Road. Hesitated about whether to choose Option 4, but did it want a general non-specific response.</p>
<p>NOT our parks e.g Shadbolt Park.</p>
<p>The Hook arena area, given the proximity of Horton Country Park and other green land would appear to offer some opportunities. I would strongly oppose further development on the parklands in the North of the Borough (Cuddington Ward) as has been rumoured. These are already highly developed areas and the existing parks are an essential resource for the local community.</p>
<p>KT19 8LW</p>
<p>I think longmead and cox lane could be developed further Possibly watersedge Including retail opportunities for both sites</p>
<p>Areas that have seen a lower density such as woodcote and college areas Reigate Road</p>
<p>KT18 7LZ</p>
<p>Organ Inn, Upper High Street Derelict land adjacent to Ewell East station currently owned by NESLOT Hook Road Arena (how often is this used?) Sutton Grammar School sports ground off Northey Avenue (not an Epsom and Ewell School)</p>
<p>Should use existing brownfield sites or previously developed land before using Green Belt land; once encroached it's too easy to lead to urban sprawl. But local schools and GP surgeries etc are already under enormous pressure so if "the costs of delivering the necessary infrastructure will be very high and could prove too expensive to build" or "it is difficult to find land for new facilities" how is the Borough to service the needs of all the additional people it is proposing to house? There seems to have been so much development recently with the conversion of office buildings along East Street, the flats in Station Approach and Church Street plus the new development in the Stones Road vicinity and Noble Park is the Borough not already 'in credit' with regard to housing provision? However, having said all this, suggested sites would be unused space above the shops in the town centre, gas works by Hook Road car park, old Iceland site in Upper High Street.</p>
<p>The land either side of College Road between the College and Drift Bridge - Downs Farm land to the north of the road, and land to the south of the road towards Epsom Downs station.</p>
<p>Q10 IS AN UNFAIR QUESTION AS NONE OF THE OPTIONS ARE ACCEPTABLE / VIABLE AND THEREFORE THERE SHOULD BE A 5TH OPTION ALLOWING FOR THIS.</p>
<p>land near Epsom college to the rear of longdown lane.</p>

KT18 7NZ
I suggest you nibble at the green belt all around so that every area has to have a few new houses to reduce the impact to communities. Also living where we are, the additional services (schools/GP's/roads etc) for the new houses on the NESCOL animal husbandry site have not been put in place and those houses seem have been sold to residents from London. Existing residents pointed out the oversubscribed schools and GPs in the area but development continued unhindered. I really hope the families in those houses can have their needs met properly but I doubt it !
If green belt needs to be sacrificed, it should be of low landscape quality and the local infrastructure must be able to cope - services, schools, roads, public transport. Possibly some areas towards Horton might be released, but ideally only if it can be connected to rail services (e.g. a loop line from Epsom/Ashted to Chessington).
Hook arena. The gas works on East Street, which mirrors the development of former offices on that stretch of road. However current developments have seriously impaired traffic conditions in the borough as the infrastructure is struggling to cope.
No - I would like to ensure protection of existing green space.
The Organ Inn site and the caretaker's site in Nonsuch Park by entrance that has been empty for some years could be suitable for three storey building.
Upper High Street/lidl site. Build over surface car parks, e.g Upper High Street, Depot Road. Convert Hook Road car park. Gas holder site Hook Road. Linden Bridge school. Any empty office buildings.
There is lots of options. If you evaluate places such as the area behind Hook Road and the new Ford garage and alongside the footpath - there is space there for 3 dwellings of say 2 bedroom houses - with not much of a garden but more urban living. Equally the derelict Miles Rd offices should be demolished and turned over to meet the housing needs etc. Also the Lidl and Aldi proposals meet some of the required housing needs.
KT19 8JG
More brownfield sites using tree lines and trees as barriers for unsightly larger buildings needed. Traffic calming measures, street cleaning capacity and road surfaces are already appalling so more investment needed in those area first or alongside this new initiative.
Scotland - they have much more space in the highlands.
Wales. They have more room in Wales for housing.
P19, P22, P29, P52,
P19, P22, P29, P52,
KT19 9EL
The old worcester pub
Living in Reigate Road has meant that we have seen the huge increase in traffic and disruption caused by the two new housing developments on our road, especially the former Nescot site, which is due to be increased even further. There are queues of

traffic at least twice daily for hours at a time, and there are also frequent queues at the weekend. These queues extend through Ewell village and the parallel road, Banstead Road, which also affects the Ewell by-pass. This means that the transport infrastructure is now already overloaded, with similar effects on doctors, schools, public transport and hospitals. Pollution resulting from developments should also be factored in for future housing stock. It would help if future plans insisted on affordable housing rather than profitable development for building companies. For these reasons I would recommend development around Horton or Christ Church Road, or similar sites.

KT18 6JF

Please finalise a decision on the former Dairy Crest site, close to Epsom town centre.

We don't need another supermarket so the Lidl site could be used purely for houses instead.

KT18 7JU

Subject to further investigation at this stage.

Subject to further investigation at this stage.

The town centre would benefit from homes, the space above shops and other buildings could be developed and used. The town has had it's heart ripped out by thoughtless 'progressive' town planning over the last 40 years.

KT17 3PU

Build above shops, train stations or instead of empty wear houses but please don't use up too much green space. Please keep Epsom common and the parks. Please make sure you leave enough room for cars to park.

You should protect the conservation areas - in particular the rumour that the Atkins Woodcote Grove site is going to become housing. From what I understood they were only allowed to build on the green space, if when the old building was demolished the land was put back to green space. They should not be allowed to go back on the agreement and the site of the Listed mansion should not be damaged.

Any brownfield site. Undeveloped land near railways (train noise is less obtrusive than constant road traffic noise and fumes.

There are two fields by Langley Bottom Farm, Langley Vale which, I believe, were not part of the sale to the Woodland Trust. Could these be used to extend Langley Vale village?

KT17 4EP

Watersedge. To initiate a significant regeneration project.

No we need open spaces for a balanced life style and these should be kept in order to maintain a healthy and natural environment for future generations.

sites e.g. Longmead industrial estate - a large area of low rise buildings. could accommodate the current industrial units along with significant new housing. this type of development also offers the opportunity to provide the necessary infrastructure to support the increased resident numbers. this is not the case with simply increasing densities of current housing where these needs are hidden and simply increase the pressure on existing infrastructure.

Have the old hospital cluster sites been fully developed?
Around derelict Hollywood Lodge, near Christ Church road for suitable housing.
Please see attached supporting letter
would need to research more to advise
Longmead Industrial Estate Kings Arms Pub, 95 East Street
Yes. Savills has been instructed to promote land at Downs Road, Epsom for residential development (SHLAA reference 266). The report and vision document - together with a review of EEBC Green Belt Study - has been submitted under separate cover by email.
KT18 7SL
KT18 5JN
None - Green Belt should stay as it is. That is the whole point of it being Green Belt!
1. Land to south east of Chantilly Way. 2. Reigate Road frontage only from termination of existing houses to College Road and no deeper than existing houses. 3. Land South of College Road and east of Longdown Lane South. There isn't a box for comments, this is mine, "The survey refers to domestic residential house building to achieve desired numbers. There is an enormous difference between perceived need and availability in a way which residents would accept. The numbers of need by both the Council; and uplifted by the Government bear no resemblance to what is sustainable. There is scope for a modest uplift from the current 181 dwellings per annum listed in the present Local Plan but nowhere near to the perceived need figures. Account should be taken of "Windfall Site" as was done in the 2007 Local Plan submission as proof has been that they figure quite highly in the eventual outturn rather than relying upon identified specific sites. Combined with this survey serious account needs to be taken of Infrastructure, just to name a few, Transportation, (including better cycling facilities), Education, Medical & Health. Serious thought should be given to a transport link between western end of Wells Road and Horton Lane to relieve Epsom Town Centre, and to help with potential growth, but that would need to be in conjunction with wider out of Borough co-operation with London Boroughs/TfL. For one, I have in mind junction improvements and modification at Hook underpass junction of A243 and A309 to allow full access there to the A3 which would also ease congestion at Tolworth A3/A240 junction"
Our client, Trelissick Ltd, has a site 'The Looe' which is located off Reigate Road, Ewell. We have previously submitted representations to the Local Development Framework and draft Development Management Policies document to promote the site for residential development and recommend that it is removed from the current Green Belt designation. We have also submitted a Call for Sites form. As per our previous representations, we wish to promote for residential development and release from the Green Belt. The site is currently occupied by commercial units in B1 and B8 use which are close to the end of their economic life. The site is previously developed land within the Green Belt. Given it is previously developed land; the site does not serve the purposes of the Green Belt as set out in paragraph 80 of the NPPF. The Epsom and Ewell Green Belt Study (February 2017) assesses the performance of land designated as Metropolitan Green Belt within the Borough. The Looe site is

within Parcel 52 'Land to the east of Reigate Road'. The Parcel is the lowest performing against Purposes 1 – 4 of Metropolitan Green Belt, with an overall score of 1 out of a possible 12. This indicates that Parcel 52 should be released from the Green Belt given its very low contribution to the purposes of the Green Belt. Overall, the site is suitable for development, available in the short to medium term and is achievable. On this basis, it is a deliverable site (as per footnote 11 of the NPPF) and would contribute to meeting the objectively assessed need for housing in Epsom and Ewell.
The town centres full of empty offices turn into housing Upper high street Old Dairy site and ex Iceland site should be housing not retail
old dairy crest alexandra road- residential only
epsom town town centre
Use golf courses land for housing. Use wooded land opposite old maternity wing of Epsom hospital for housing.
Old organ in site on London road north cheam
Upper High Street Lidl/Aldi proposed areas. If we have such a housing need that there are thousands of people sleeping on the streets then these brownfield sites (which you claim there aren't enough of) should surely be better used for housing than yet another supermarket (when there is already a Sainsburys, two co-ops and a Tesco express within easy walking distance of these sites).
Previous hospital cluster and adjacent land should be more intensively developed
East St and Kiln Lane Area
Any empty run housing in the area
Could the area around East Street where significant numbers of under utilised office space be looked at for conversion to homes and apartments. This could address some of the urban requirement plus we should look carefully at how retail space is used in the centre of Epsom and consider whether this could be utilised for new housing purposes where appropriate.
Why not use the site the tip is built on as you are pretty much trying to stop the people who pay our thousands a year in council tax using it any way! Kiln lane site could accommodate some flats if the travellers were evicted from their illegitimate site! This won't happen due to the councils stance it takes with travelers and letting them do what they like!
Former Epsom and Ewell High School playing fields at Scotts Farm Road is capable of achieving development of up to around 150 dwellings on 3.13ha yielding a density of circa 47dph along with enhancements to sports and recreation facilities at EEHS. Representations have previously been made under the Call for Sites - ref. PLG50264607.
I feel very strongly that Shadbolt Park should be unaffected by any development plans and feel very annoyed that it has not been brought to our attention sooner that it is under threat!

Epsom & Ewell Local Plan Update – Issues & Options Consultation Summary Report



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1 Introduction

1.1 Purpose

- 1.1.1 This consultation summary report provides a record of the consultation methods and community engagement activities that have taken place as part of the Issues & Options Consultation to inform the update to Epsom & Ewell's Local Plan.
- 1.1.2 It details how the Council has complied with the consultation requirements prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the Council's Your Involvement in Planning (2016) in the preparation of the update to the Local Plan.
- 1.1.3 The report in conjunction with the Questionnaire Consultation Responses Report presents a summary of comments received during the consultation, highlighting the key issues identified and how the Council will seek to address these. It also explains the next steps in the process of preparing the update to the Local Plan.
- 1.1.4 This report been prepared so that our residents and other interested parties can see the key issues that have emerged from the responses to the consultation and to provide assurance that their comments have been registered, read, and reported to Councillors.

1.2 Local Plan Update

- 1.2.1 In response to changes in national policy and planning in general, the Council is carrying out a partial review of the Borough-wide Local Plan. This specifically focuses on policies relating to housing need and housing land supply. The review is necessary because the current policies are no-longer up to date or consistent with national planning policy and guidance.
- 1.2.2 The first stage of the process, a comprehensive review of the technical evidence used to inform the preparation of the Local Plan, is now substantially complete. The outputs from these technical studies have been used to prepare the Issues & Options Consultation paper.
- 1.2.3 Government requires Councils to have an up to date Local Plan by 2018.

1.3 Issues & Options Consultation

- 1.3.1 In accordance with Your Involvement in Planning (2016), there has been opportunity for involvement in the initial stages of the evidence gathering for the Local Plan Update. This has been reflected upon in Section 2.2 of the report.
- 1.3.2 The first key consultation stage in the preparation of the update to the Local Plan is Issues & Options. The consultation document sets out the reasons behind the review, provides an overview of the evidence base and the challenges facing the Borough in relation to housing growth. The paper also sets out the 'Options' that could be pursued in order to plan positively for growth and meet the national planning policy

requirement of 'significantly boosting the supply of housing'¹. The consultation did not include any housing targets, site allocations or policies.

1.3.3 Councillors at the Licencing and Planning Policy Committee meeting on 14 September 2017 approved the Issues & Options document for consultation. Consultation was open from 12am on Monday 25 September and closed at 5pm on Monday 6 November 2017. The Council consulted for a period of six weeks. In order to provide further opportunity for our residents and communities to make their views known the consultation ran for an additional week

1.3.4 Overall, the Council received over 600 questionnaire responses and 68² written individual or organisation representations.

1.4 **Compliance with Your Involvement in Planning (2016)**

1.4.1 The Issues & Options Consultation has been undertaken in accordance with the Council's Your Involvement in Planning (sometimes referred to as a Statement of Community Involvement).

1.4.2 This document sets out how the Council will involve residents, businesses and other organisations in decisions on plan making and local development. The document recognises the importance of effective community involvement and dialogue and explains how the Council aims to achieve this to ensure a transparent and open planning process.

1.5 **Compliance with Regulation 18 Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)**

1.5.1 The consultation was carried out in compliance with regulation of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This provides information regarding the preparation of a plan and is mainly concerned with notification procedures. Regulation 18 is set out below:

Figure 1: Regulation 18 Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

Preparation of a local plan

18.—(1) A local planning authority must—

(a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and

(b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

¹ National Planning Policy Framework Paragraph 47.

² Includes 5 questionnaire responses which were emailed or posted in.

- (2) The bodies or persons referred to in paragraph (1) are—
- (a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
 - (b) such of the general consultation bodies as the local planning authority consider appropriate; and
 - (c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.
- (3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

2 Consultation Preparation

2.1 Background

- 2.1.1 A series of decisions made by the Courts and Planning Inspectors in relation to local plans in other areas indicated that plans adopted prior to the publication of the NPPF and any evidence base prepared prior to this date, where housing delivery was based on Regional Spatial Strategies could not be considered up to date.
- 2.1.2 In response and to ensure that the Council continued to plan positively for growth across the Borough, a decision was made in 2015 to reprioritise and review the Local Plan evidence base documents.
- 2.1.3 As a result, the Council wrote and commissioned various evidence base documents including a Green Belt Study (Stage 1), Strategic Housing Land Availability Assessment (SHLAA) and Strategic Housing Market assessment (SHMA). The SHMA presented an Objectively Assessed Housing Need (OAHN) figure for the Borough which was significantly higher than the current housing target. This meant that the approach and policies set out in the Core Strategy needed to be reviewed and various options considered as to how to address development needs in the future.

2.2 Previous consultations

- 2.2.1 Prior to the decision to review the Local Plan evidence base documents, the Council has been in the advanced stages of preparing a Borough wide Site Allocations Policy document. The purpose of this document was to identify and allocate sufficient land for green infrastructure, residential and commercial development, and community infrastructure to meet the Borough's requirements during the period up to March 2026, together with areas for conservation or special protection both in the built and natural environment, in accordance with the NPPF and the Core Strategy. It would have formed a key part of the Local Plan.
- 2.2.2 To support the preparation of this document the Council undertook a series of public consultations these have been tabled below. A significant proportion of this previous work remains relevant and will be taken forward accordingly in the update to the Local Plan.

Plan making stage	Dates
Issues & Options (Regulation 25)	Initial consultation during July 2006-May 2008
	Consultation on Housing Land Supply Strategy during 2010
	Consultation on Housing Site Allocations options during 2011
	Further consultation on Other Sites Policy Proposals during October 2013 – January
	Consultation on remaining Site Allocation issues July – August 2015

Publication (Regulation 27)	October 2015
Pre-Submission Consultation	November –December 2015

Table 1: Timetable of previous Local Plan consultations

2.3 Councillors

2.3.1 The decision to undertake a public consultation is for Members of the Council (Councillors) to formally agree. Therefore, as part of the consultation preparations, Councillors were briefed on the findings of the evidence base and the Government’s plan making requirements including meeting Objectively Assessed Housing Need (OAHN). It was necessary that Councillors understood the content of the consultation fully before making a decision to consult with the public and key stakeholders.

2.3.2 Councillors were invited to attend a series of All Members’ briefings to inform Members on the outcomes of the evidence base review and what the implications of these were for the preparation of the local plan update. The sessions also included briefings on Government proposals including the Housing White Paper and the recent Planning for the Right Homes in the Right Places consultation and the potential implications for the Local Plan. Table 2 below provides a summary of the briefings.

Date	Topic
15 September 2016	Strategic Housing Market Assessment (SHMA)
30 March 2017	Housing White Paper & implications for our Local Plan. Including an introduction of key evidence base documents.
13 July 2017	The Local Plan and the evidence base Inc. a workshop facilitated by the Planning Advisory Service (PAS).
21 September 2017	Introducing the Issues & Options Consultation

Table 2: All Members’ Briefing Timetable

2.3.3 The All Members’ Briefing session on 21 September 2017 specifically introduced the Issues & Options Consultation. Councillors were provided with a Member’s Pack comprising of letter outlining the consultation and where further information could be found as well as a hard copy of the consultation document and a number of leaflets. A follow up email was sent to all Members, which included a copy of the Officer’s presentation as part of the electronic web-based weekly Members’ Update.

2.3.4 Weekly drop in sessions with Officers were available for all Members during the 6- week consultation. The attendance of the sessions have

been detailed Section 3.3 of the report and the minutes provided in Appendix 1.

- 2.3.5 The Licencing & Planning Policy Committee (L&PPC) governs the preparation of the Local Plan. The decision to consult on the Issues & Options Consultation Document was made at the L&PPC on 14 September 2017. The accompanying report is available to view on the [Council's website](#).
- 2.3.6 An e-briefing was sent to every Member informing them that the consultation was open 25 September 2017. The e-briefing included an electronic copy of the consultation document as well as key information on the various methods available to view the document and make comments on the consultation document. The contact details of the planning policy team were provided and Members were advised of weekly local plan drop in sessions that would be run during the consultation period. The drop in sessions would provide an opportunity for Members to ask officers questions in relation to the local plan.

2.4 Internal departments

- 2.4.1 Internal departments such as Property Services, Housing & Community and Environmental Health contributed to the preparation of key local plan evidence base documents. Senior Officer comprising the Council's Leadership Team were involved in the finalising of the Issues & Options Consultation Document.
- 2.4.2 An article on the Local Plan and the forthcoming Issues & Options Consultation was published in the July 2017 issue of Team Brief, which is circulated to all staff. During the September 2017 verbal staff briefing the challenges in responding to housing need were outlined and the consultation introduced to all staff.
- 2.4.3 Briefing emails to Development Management and Customer Service colleagues were issued to keep them informed of the consultation.

2.5 Borough Insight and E-Borough Insight

- 2.5.1 Articles on the Local Plan were featured in the November 2016 (Issue 67) and June 2017 (Issue 69) Borough Insight, which is the official newsletter of Epsom & Ewell Borough Council. The newsletter is hand delivered to over 32,000 householders across the Borough.
- 2.5.2 These articles did not contain the exact consultation dates, as the decision to consult on the document had not been ratified by Councillors on the Licencing & Planning Policy Committee at the time of publication. As this was the case, the article informed readers that a consultation was planned for the during the Autumn 2017.
- 2.5.3 The consultation was the feature item of Issue 42 of E-Borough Insight (the Council's monthly electronic newsletter) and was promoted in Issue 43.

2.6 Local community groups

- 2.6.1 The Council has sought to proactively engage with key local community groups during the review of the evidence base and

preparation of the Issues & Options Consultation Document. This has included meetings to discuss the outcomes of the evidence base and the Government's plan making requirements with the Campaign to Protect Rural England (CPRE) and Epsom Civic Society (ECS). Both of these organisations have significant local membership. These meetings served as precursor to the consultation.

3 Issues & Options Consultation

3.1 Overview of consultation methods adopted

Method	Details
Consultation webpage- links on Council's homepage, policy pages and scrolling screen	Included information on what the consultation is about, how to find out more (including factsheets on key topic areas), the consultation document, interactive consultation and response form. The consultation was a feature on the Council's main webpage through the 6 weeks.
E-mail / letters sent to all those registered on the Local Plan database	972 consultees invited to the consultation as they were registered on the local plan database (pre-consultation).
Consultation document made available to inspect at the Town Hall and Borough libraries	Hard copy of the Issues & Options Consultation Document, instructions and leaflets were available in the Borough Libraries and at the Town Hall reception.
Media Release	Release issued on 25 September 2017.
Notice in local newspaper	Notice in the Epsom Guardian 21 September 2017.
Poster	Displayed at all council venues including 25 Council owned community noticeboards from 4 th September 2017.
E-poster	Displayed at all council venues including Epsom Playhouse, Bourne Hall, Ebbisham Centre, Town Hall & Libraries.
Leaflets	Available at all the council venues including the Town Hall, libraries, Hook Road car park & a local café. Leaflets were included in electoral canvassing correspondence to 1,302 Borough households.
Social media channels	Promotion via social media (Twitter & Facebook) throughout the 6 week consultation.
Exhibition displayed on Civic Street, Town Hall	The A0 print outs of the 4 options were displayed on Civic Street from week 4 of the consultation.

Table 3: Overview Consultation Methods Adopted

3.2 Local Plan Consultation Paper and website

3.2.1 The Issues & Options Consultation paper sought to identify the key challenges for the local plan and provides four potential strategic options to how these could be addressed. In order to fully explain the growth challenges that face the Borough every effort was taken to make the consultation paper accessible to as wide an audience as possible. The context was concise, to the point and written in plain English. The paper addressed the frequently asked questions and answers relating to housing growth and the Green Belt as well as a

selection of 'info-graphics' to make the document as engaging and non-technical as possible.

- 3.2.2 The consultation document followed the established format by first setting out the reasons behind the Local Plan review. This included an overview of the evidence base; where the demand for new homes has come from; and an insight into the national context. This included reference to the government's proposed standard methodology for calculating housing need. This was contained within the 'Planning for the Right Homes in the Right Places' consultation. It was fortuitous that this was published on the same day the Issues & Options Consultation was approved by the Licencing and Planning Policy Committee on 14 September 2017.
- 3.2.3 The consultation document set out the options that could be pursued to plan positively for growth and meet the national planning policy requirement of 'significantly boosting the supply of housing'. These options were supported by a series of frequently asked questions and answers that would provide respondents with a greater understanding. Respondents were provided with a series of questions that focused upon the options.
- 3.2.4 The questionnaire was specifically designed to generate interest and gain responses from residents and local communities. While it was available to all, and indeed a wide variety of stakeholders responded to the questionnaire, most of responses came from residents and local community interest groups. Other stakeholders, such as infrastructure partners, landowners, and the development industry were provided with other appropriate avenues of engaging with the Issues & Options Consultation.
- 3.2.5 The questionnaire set out four possible options to respond to the challenges facing the Borough – these being achievable, deliverable and developable options within the context of national planning policy, housing land supply and on-the-ground conditions. The questionnaire did not suggest options that would be contrary to national planning policy or unachievable. The questionnaire sought responses on the following Options:
- Option1 Urban Intensification – continue to develop within the existing urban area and meet all of housing need by delivering housing at a higher density and building height.
 - Option 2 Release some Green belt land for new homes – extend the urban area where appropriate by amending the Green Belt boundary and thereby meet our long term objectively assessed housing need.
 - Option 3 Significant release of Green Belt land to meet all of our objectively assessed housing need and more.
 - Option 4 Striking a balance – seeking to meet as much of objectively assessed housing need as sustainably possible. This could involve a combination of urban intensification at sustainable locations and reviewing the Green Belt boundary where necessary.

- 3.2.6 The consultation paper was available to view and comment upon via the Council's website. A specific Local Plan Issues & Options Consultation webpage was created with a shorten web address and was a feature on the Council main webpage throughout the 6 week consultation. The webpage included details of how to get involved including a link to the interactive consultation document and questionnaire. In addition, the webpage included the views from various organisations, representing different viewpoints who had previously expressed opinions on how the Borough should develop.
- 3.2.7 A series of topic based factsheets were also published, these sought to provide further detail and explanation of the evidence base relating to housing, economic development, the Green Belt and Infrastructure.
- 3.2.8 The Sustainability Appraisal Report supporting the consultation document was also available to view on the consultation webpage.
- 3.2.9 A summary report of responses received at week 2, 4 and 6 of the consultation was also published and available to view on the webpage. The summary report did not include any detailed analysis or officer commentary.

3.3 Local Plan Member Drop In Sessions

- 3.3.1 During the consultation, Officer's provided Members with a weekly drop in sessions. This provided Members with the opportunity to ask questions/ seek clarification or further information from Officers. Attendance at the sessions can be found in Table 4 below and the minutes provided in Appendix 1.

Date	Member
4 October 2017 -3:30pm	Councillor Michael Arthur
24 October 2017- 4pm	Councillor Tina Mountain

Table 4: Local Plan Member Drop in Sessions Attendance

3.4 Local Plan Question & Answer Sessions

- 3.4.1 At the outset of the consultation, Officers invited key community groups and stakeholders to attend a Question & Answer Session. Table 5 listed the attendance at these sessions, minutes from each session can be found in Appendix 2. Section 4.2 of the report provides a summary of the comments and points raised during these sessions.

Date	Group
16 October 2017 -10:30 am	Campaign to Protect Rural England
19 October 2017- 2pm	Epsom Civic Society
23 October 2017 -10am	Standing Committee of Residents' Associations
27 October 2017- 10am	Bernie Muir, Surrey County Councillor

23 November 2017-2pm	Surrey County Council
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Table 5: Local Plan Question & Answer Sessions

3.5 Public meetings

3.5.1 Officers were invited and attended public meetings organised by local Councillors, Residents Associations and other community groups. The Planning Policy Manager and Senior Planning Policy Officer provided a presentation on the Local Plan explaining the content of the Issues & Options Consultation Document. Questions and answers then followed.

Date	Group
11 October 2017-7:30pm	Labour Party Group
13 October 2017-8pm	Stoneleigh and Auriol Residents' Association
18 October 2017-8pm	Ewell Village Resident's Association
1 November 2017-8pm	College Ward Resident's Association ³

Table 6: Public Meetings

3.6 Other communication techniques

3.6.1 Officers were available to talk to members of the public and other interested parties during office hours at the Town Hall (by appointment only) and via telephone. During the consultation officers also answered questions raised via email.

3.7 Who was consulted and how?

3.7.1 To meet the requirements of Regulation 18 'Preparation of a Local Plan', the Council had to consult:

- Each of the specific consultation bodies that the local planning authority consider may have an interest in the proposed plan;
- Such of the general consultation bodies as the local planning authority consider appropriate;
- Such residents or other persons carrying on business in the local planning authority, from which the local planning authority consider it appropriate to invite representations.

3.7.2 In total 972 people were consulted directly via letter or email as they are registered on the Local Plan database. A breakdown of the consultees is available to view at Appendix 4 of the report. Consultees were informed that the consultation had begun and provided the key information on the various methods available to view the document and how to make comments on the consultation document. During the

³ Head of Place Development attended.

consultation 84 people, including 70 individuals requested to be add to the Local Plan consultation database.

- 3.7.3 Although Regulation 18 does not refer to the availability of documents, all information was made available on the Council's website, including a link to the consultation document on the planning policy pages and on the Council's homepage including an advert on the scrolling pane throughout the 6 week consultation period. Copies of the document were also available to inspect at the Town Hall reception and in all local libraries.

4 Responses to the Issues & Options Consultation

4.1 Overview of responses received

4.1.1 During the consultation period, the Council received in excess of 600 questionnaire responses and 68⁴ written responses.

4.1.2 Over 80% of the questionnaire responses were from individual residents and the written responses came from:

- 34 individual residents (including 5 questionnaire responses)
- 3 resident associations
- 2 community groups
- 7 landowners, agents, developers and planning consultants
- 9 County Council & Local Planning Authorities
- 3 statutory consultees
- 2 businesses
- 1 education provider
- 3 infrastructure providers, including water, transport and health providers
- 1 heritage and historic environment organisations
- 3 environmental groups

4.1.3 Alongside the consultation, the Call for Sites exercise was reopened which provided an opportunity for land owners, agents, community groups to promote site for development. During the consultation period 10 sites were submitted for consideration, of these 4 were new sites that not been previously promoted.

4.2 Feedback from public meetings and question and answer sessions

4.2.1 Officers attended and presented at a number of public meetings and question and answer sessions with key stakeholders groups, these have been outlined in Table 4 and 5 in Section 3 of this report. Appendix 2 provides the minutes from these sessions. Notable comments from these events included:

- Understanding that there is a real need for homes especially affordable homes.
- Concerns over infrastructure provision to support new homes (schools, doctors, highways & parking). Highway network is at capacity and there is limited scope to expand that capacity for the private motor vehicle. Funding sources to invest in infrastructure are also limited.

⁴ Including 5 questionnaire responses sent via email or post.

- Need to protect the Borough’s visual character and appearance – especially in Conservation Areas and other historic environments.
- Important to protect open spaces & play pitches in the most built up areas of the Borough.
- Need to ensure a balanced borough and take into account how Cross Rail 2 will attract business.
- Need a clear vision for Epsom and consideration of who will live in the new homes.

4.3 Review of the questionnaire responses

- 4.3.1 The accompany report ‘Questionnaire Consultation Responses’ provides detailed analysis of the responses received through the interactive questionnaire and includes Officer’s comments. The key outcomes from the questionnaire have been summarised below.
- 4.3.2 The results indicated that it was finely balanced in terms of support for Option 4 but ultimately the majority of responses agreed that Option 4 was the “least bad” approach for going forward. There was little in the way of support Options 2 and 3. The limited support for an “all-out growth” approach came from a small sector of the development industry. It is noteworthy that while only 30% of responses to Question 1 supported Option 1. The responses to Question 8 demonstrated that a significant number of responses are supportive of urban intensification and taller buildings in the right locations – subject to maintaining and enhance visual character and appearance.
- 4.3.3 It is also worth noting the number of responses supporting the retention of local parks and open spaces- particularly in the north of the Borough.
- 4.3.4 The responses suggest that residents and communities still do not fully understand the purpose of Green Belt, including the extent of the designated and how a review process would work. Equally, there remains a knowledge gap in respect of what urban intensification could look like – including best practise.

Officer Comment:

Officers will seek to address the knowledge gap by preparing more evidence – such as Green Belt Study Stage 2 and paper on how we could achieve higher densities (in the urban area). This work is already underway.

- 4.3.5 Responses to the questionnaire were clear in their support for meeting local affordable need. Indeed, many responses suggested that we should only be meeting affordable needs, or seeking a significantly higher proportion (up to 80%) of affordable provision as part of new development.

Officer Comment:

This support is welcomed. However, achieving this aspiration will be extremely challenging because of the policy and viability constraints put in place by government.

Recommend that proceed with high level site allocation viability appraisal work to identify what contributions can be achieved.

- 4.3.6 The responses identified a range of sites that respondents considered suitable as potential sources of housing land supply. It should be noted that a number of these had previously been identified or were located outside of the Borough's administrative boundary.

Officer Comment:

Officers will be assessing the new sites identified by residents and land promoters.

- 4.3.7 Many responses raised concern in relation to the necessary supporting infrastructure including roads and schools that will be required to support future homes.

Officer Comment:

Officers agree that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough.

Responding to this will be challenging, as Local Plan Inspectors have not placed great weight on infrastructure capacity as a constraint to growth taking place.

Officers recommend that the Council, and its infrastructure partners, explore innovative and cost-effective solutions to this issue – rather than maintaining traditional costly solutions

4.4 **Review of the written representations**

- 4.4.1 During the consultation, a total 67 written representations from a wide range of respondents were received including community groups, environmental groups, residents and other interest parties such as landowners, businesses, developers, statutory organisations. This included responses from the Duty to Co-operate bodies such as neighbouring local authorities, statutory bodies and key infrastructure providers.

- 4.4.2 The comments received have been summarised under the following themes.

- Assessment of housing need
- Affordable housing
- Meeting housing need
- Green Belt

- Parks and open spaces
- Character of the area
- Infrastructure
- Suggested alternative approaches
- Sites promoted for consideration
- Other issues raised

4.4.3 The following section of the report provides summary of key issues raised by respondents in relation to these themes accompanied by officer commentary.

4.4.4 Officers have also considered and responded to the individual comments and this is set out in Appendix 3.

4.5 **Overview of key issues raised**

Assessment of housing need

4.5.1 A number of respondents disagreed with the assessment of housing need. These respondents believed the assessment from both the Council's SHMA and the government's proposed standard methodology were flawed, as they did not take into account issues that restrict the supply of housing land such as insufficient infrastructure and environmental constraints.

4.5.2 A number of comments also appeared to suggest that the Council should challenge the findings of the SHMA and the housing number that had been 'handed down' from government.

4.5.3 In contrast some comments received suggested that the assessment of the Borough's OAHN, as set out in the Kingston & North-East Surrey SHMA, is a significant underestimate of the true level of need for new homes in the Borough. It is stated that this has occurred as a result of the methodology used which, is considered to be flawed. They believed that the SHMA had not been undertaken in accordance with the NPPF and Planning Practice Guidance (PPG).

4.5.4 Likewise a minority of respondents considered that 579 homes per year produced by the Government's proposed standard methodology was more accurate.

Officer Comments:

National planning policy requires local planning authorities to prepare local plans on a foundation of evidence. One of the key pieces of evidence is the SHMA. National planning policy requires us to prepare our SHMA in a very specific way. If we failed to do this we would run the high risk of our Local Plan being found unsound.

Officers have some sympathy with the suggestions that the government's calculations for future housing artificially inflate the scale of demand. Our response to the government's "Planning for the right homes in the right places" consultation included robust

comments on the shortcomings of their proposed changes to our national planning system.

Affordable housing

- 4.5.5 A high proportion of respondents recognised that housing within the Borough was unaffordable. Many respondents were of the view that only affordable houses should be built in the Borough.
- 4.5.6 Some respondent felt that the Council should consider innovative funding options to build the much needed affordable homes.

Officer Comments:

The delivery of affordable housing is a key priority for the Council.

Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability.

This support for more affordable homes is welcomed. However, achieving this aspiration will be extremely challenging because of the policy and viability constraints put in place by government.

Recommend that proceed with high level site allocation viability appraisal work to identify what contributions can be achieved.

The Council is exploring the potential establishment of property vehicle to deliver new housing. The success of such a solution is dependent upon government providing local authorities with the necessary tools, to finance the purchase and development of sites.

Meeting housing need

- 4.5.7 Some respondents expressed disappointment as to the apparent “numbers exercise” rather than a drive to achieve sustainable growth. Many responses refer to need to take a pragmatic approach to delivering new homes. There was a strong consensus that there was a need for new homes but the amount of new homes delivered should not be at any cost and they should be in the most sustainable locations.
- 4.5.8 Respondents highlighted the important of brownfield sites and an urban area first approach to identifying housing land. Comments included the need to re-examine the urban capacity and revisit general density assumptions.
- 4.5.9 There were a number of respondents who supported Option 3 to seek to deliver enough homes to meet the housing need in full and if possible some of the residual need from other areas. They believed meeting housing need in full would be the only option to achieving an up to date local plan.

- 4.5.10 There was acknowledgment of the commitment to work together with the Housing Market Area partners. Some respondents advised that greater working with neighbouring authorities was required to either to challenge the OAHN or identify land for housing.

Officer Comments:

Officers share concerns, particularly in relation to the apparent focus on securing housing numbers, as opposed to planning for sustainable growth. Nevertheless. We have to work within the planning system that the government is creating

Officers are already pursuing a brownfield land first approach. Possible sites have been identified in the Borough wide SHLAA and will be taken forward as necessary. This provides a robust assessment of available and deliverable brownfield sites. We have also prepared and published a Brownfield Land Register. Both of these demonstrate that there are insufficient available brownfield sites to meet our OAHN.

Many neighbouring Surrey planning authorities face the same challenges that we have – namely, that they are heavily constrained by Primary Constraints and the Green Belt and that they have an insufficient supply of available and deliverable sources of housing land.

Green Belt

- 4.5.11 A number of respondents felt the Green Belt should be protected at all costs as it has air quality and environmental benefits. Others were of the view that the most utilised Green Belt needed to be protected and the less utilised considered for housing. Many were concerned that Epsom & Ewell has a low proportion of Green Belt, especially in comparison with other Surrey authorities.
- 4.5.12 Other comments stated that housing needs should be able to be met on the Borough's brownfield sites and that the Council should explore further these opportunities before considering Green Belt release.
- 4.5.13 Some respondents felt that it would be evitable that some Green Belt would be lost and a notable number supported the review of the Green Belt given the housing land supply position. It was considered that the rationale (also referred to as the *exceptional circumstances*) for looking to amend the boundary of the Green Belt had been clearly demonstrated and the need to do so was already well-documented.
- 4.5.14 Many commented that if Green Belt release was necessary, it should only happen in the most sustainable areas and must not prejudice the overall performance of the Green Belt. By contrast, a minority of respondents were of the view that the review of Green Belt boundary should focus solely on meeting all the current housing need in full and future need to prevent future reviews.

Officer Comments:

Officers note the wide range of views in relation to reviewing the existing Green Belt boundary. Some comments reflected a general misunderstanding of the purpose(s) of Green Belt policy.

A more detailed assessment of the Borough's Green Belt is being undertaken by independent consultants. This will comprise a Stage 2 of the Green Belt Study published in April 2017.

It is important to note that the Green Belt Study is part of a wider iterative evidence base to support the Local Plan. The outcomes of which will require the careful balancing of the social, environmental and economic advantages and disadvantages to bring forward a sustainable growth strategy to underpin the Local Plan, this process will be undertaken through the Sustainability Appraisal.

Parks and open spaces

- 4.5.15 A significantly number of the responses supported the retention of local parks and open spaces particularly in the north of the Borough. There was notable support for Nonsuch Park to be designated as Green Belt.
- 4.5.16 Some residents suggested underutilised parks and open spaces including golf courses that could be considered for housing.

Officer Comments:

It is noted that many formal public open spaces, such as playing pitches and allotments have additional layers of protection outside of the planning system. These may ultimately render such sites unavailable as possible sources of supply.

Character of the area

- 4.5.17 Many wanted to protect and preserve the character of the Borough including its open spaces.
- 4.5.18 There were concerns raised as to the implications of urban intensification and there was some opposition to tall buildings as a need to maintain Epsom's heritage and character. There was a strong desire to encourage the continued improvement of public spaces, green spaces, parks and gardens in the town.
- 4.5.19 Some respondents referred to examples where urban developments have improved bio-diversity through the use of brown and green roofs, bird boxes and green corridors. Others referenced Notting Hill and Maida Vale as having far higher density than most areas and considered 'good density'. The high density development around Epsom Station drew mixed comments in relation to its success.
- 4.5.20 In addition, there were also concerns raised about the loss of smaller houses being replaced by single large dwellings or extended to create 5 and 6 bedroom properties.

Officer Comments:

Maintaining and enhancing the Borough's visual character and appearance is a key objective for the Local Plan. Officers accept that taller buildings may not constitute an appropriate development typology for every potential development in the Borough. We continue to believe that high quality design and respect for the existing townscape are key components for sustainable development in Epsom & Ewell.

Infrastructure

4.5.21 The impact of future development was a major concern with a large number of respondents stating that infrastructure was already at capacity. It was emphasised that if any development were to take place, then the required infrastructure should be in place before any new dwellings were built. Both general and specific concerns relating to infrastructure were raised, with the issues below identified as priorities:

- Schools: There were concerns that there are currently insufficient places at both primary and secondary level to meet current demand and that further growth in housing would make this current situation worse.
- Roads: There were serious concerns around congestion and that this is a major challenge for the Borough to address.
- Parking: Need for new development to have sufficient off street parking provision.
- Public transport- Rail: Need to harness the opportunities from Cross Rail 2.
- Health: Need to ensure adequate health provision including GPs and Dentists.
- Flooding: Concern related to both flooding from rivers and surface water. Areas at risk should not be developed.
- Leisure and social facilities: New facilities should be provided not just improvements to existing.
- Water supply: The need to ensure sufficient water supplies to meet future demand including sewerage and drainage.

Officer Comments:

Officers acknowledge and shared the concerns raised in relation to infrastructure and intend to continue to engage with providers and delivery partners to identify capacity issues, mitigation measures and funding opportunities where possible.

Officers have a full understanding of its Duty to Co-operate on these matters.

Suggested alternative approaches

- 4.5.22 There were number of respondents that felt that the Council should stand up to national government and refuse to meet the full development needs of the area.
- 4.5.23 There were suggestions to accommodate further development or meet housing needs on previously developed land including making use of brownfield sites, public sector land, office areas, estate regeneration and bringing back into use empty properties. Building above railway lines was also suggested.
- 4.5.24 It was proposed that housing need from within the South East should be met further afield e.g. Manchester, Leeds, Liverpool, Birmingham and Newcastle. This was alongside the proposal to relocate businesses and seek to address the north-south divide.

Officer Comments:

Officers note the comments to challenge the government's approach; however, national planning policy is challenging us to respond housing demand. We cannot simply say that the Borough is full and infrastructure cannot cope.

National planning policy requires us to prepare our evidence in a very specific way. Failure to meet national planning policy may lead to government directly intervening in how we plan for the Borough's future needs. It is more likely to result in ad hoc predatory planning application via the planning appeal system.

Officers are already pursuing a brownfield land first approach. Possible sites have been identified in the Borough wide SHLAA and will be taken forward as necessary. This provides a robust assessment of available and deliverable brownfield sites. We have also prepared and published a Brownfield Land Register. Both of these demonstrate that there are insufficient available brownfield sites to meet our objectively assessed housing need.

While the government has indicated that they are considering some measures to redistribute, the regional demand for homes they stop short of a "national plan" to address the national housing crisis. The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms.

Sites Promoted for consideration

- 4.5.25 The written responses also identified a range of sites that respondents (residents, land owners and developers) considered suitable as potential sources of housing land supply. It should be noted that a number of these had previously been identified or were located outside of the Borough's administrative boundary.

Sites promoted for consideration
Remaining West Park sites including Cottage Hospital
Inaccessible open space in Cuddington ward
Brownfield site at North Cheam (vacant shopping precinct & public house)
Land at Grafton Road, next to Linden Bridge School
Surbiton Town Sports Club
Adams yard, Worcester Park Road
Hook Rise South (along A3 heading South)
Plots at Banstead Road
Land at Downs Farm
Land at Priest Hill
Elizabeth Welchman Gardens
Stables at Grafton Road.
Epsom Common
Land to the West of Burgh Heath Road
Derelict Worcester Park Tavern
Next Hollywood Bowl at Tolworth
Land East of Downs Road
Land at Horton Farm

Table 7: Sites suggested for consideration

Officer Comments:

Officers will be assessing those sites within the authority's boundary identified by residents and land promoters as well as those sites formally promoted through the Call for Sites exercises.

Other issues raised

- 4.5.26 A small number of critical comments were received regarding the consultation. They felt the consultation period was too short or that it should have been deferred due to the government's "Planning for Right Homes in the Right Places" consultation. There were a few comments on the publicity surrounding the consultation including a lack of public meetings and that many people were unaware that it was even happening.
- 4.5.27 A number of respondents felt the options were too 'binary' and written in favour of Option 4. There were a few responses commenting on administration issues with the online questionnaire.

Officer Comments:

Officers are of the view that balance our consultation has been successful. The consultation was publicised by various methods

before and during the consultation period, including the proactive engagement with local community groups. Officers were able to engage with a significant number of residents through local public meetings and the number of responses received was one of the highest the Council had achieved when preparing planning documents.

While a small number of people considered our questionnaire too binary, in fact it has produced some very useful information.

The 6 week timeframe for consultation to the statutory requirement. In order to provide further opportunity for our residents and communities to make their views known we kept the Consultation actively running for an additional week

The Council is of the view that the publication of the government's propose standard methodology did not warrant the deferral of the consultation and the issues and challenges facing the local plan update remained the same. Furthermore, the consultation document made reference to the government's consultation and acknowledged the proposed need figure it generated.

Unnecessary delay to the local plan update would place the local planning authority and its ability to make sound decisions in a vulnerable position. As outlined in the consultation document an out of date local plan increases the risk of predatory planning applications and government intervention.

4.6 **Comments from infrastructure providers and Duty to Co-operate partners**

- 4.6.1 Responses were also received from statutory infrastructure providers and Duty to Co-operate partners. Thames Water Utilities Ltd stressed the need for adequate water and sewerage infrastructure to be delivered prior to development and requested a strengthening of the policy requirements in the Local Plan. They sought to ensure that developers are required to demonstrate that there is adequate capacity both on and off site to serve the development and that it would not lead to problems for existing users. When there are capacity constraints the developer should set out how the infrastructure improvements will be completed prior to occupation of the development and engage with statutory providers at the earliest opportunity.
- 4.6.2 Surrey Police have advised that the Local Plan should include planning policy to reduce opportunities for crime and reduce the perception of crime. The Local Plan should also ensure there is an effective mechanism to provide new emergency services infrastructure to the meet the needs of the increasing population of Epsom & Ewell. Based on the SHMA demand figure of 418 homes per year across the next plan period 17 this would result in an additional 143 incidents each year. Over the plan period this would require 26 additional police officers in various roles and 15 new support staff to maintain the existing level of response and support.

- 4.6.3 The Environment Agency commented that the Council should identify the risk of flooding from all sources and that flood risk and the history of flooding should be fully considered on sites put forward for development.
- 4.6.4 Natural England support the intensification of the urban area with the use of tall buildings where there are minimal landscape impacts and no increase of the building footprint. This avoids the loss of greenspace in the urban area while providing additional housing and minimising the need for additional grey infrastructure. They seek to avoid the loss of greenspace and associated biodiversity loss that would occur if land is removed from the Green Belt. However, in some cases, and by employing best practice urban design (50% greenspace), it may be possible to allocate a small number of housing sites adjacent to existing development that could result in a biodiversity net gain for the Borough and provide people with access to nature.
- 4.6.5 Responses were also received from Duty to Co-operate partners, including from Surrey boroughs and the Greater London Authority all of which share in the challenge of meeting housing need.
- 4.6.6 Correspondence from the Housing Market Area partners (Elmbridge Borough Council, Mole Valley District Council and the Royal Borough of Kingston Upon Thames) was received acknowledging the challenge of responding to housing need. All confirmed their commitment to on-going discussions and co-operation to responding to unmet housing need and strategic issues such as infrastructure and Green Belt.
- 4.6.7 Both Kingston Borough Council and Mole Valley Council stressed the need for full assessment of the infrastructure requirements of new development as the Council progressed towards the identification of sites.
- 4.6.8 Surrey County Council commented that when it is clearer as to where the development will be located and its scale, they will work with the Council to assess the impacts and to seek any necessary mitigation measures. In addition, Surrey's latest education forecasts indicate that a deficit of both primary and secondary school level places is anticipated for the near future across all areas of the Borough. The response highlighted the need to work together to ensure that sufficient additional provision is made to support any new development proposed in the local plan. Raised concern that Option 1 meeting housing need by providing high rise development in urban areas has potential access implications for older people that would need to be resolved through policies to appropriately influence design of buildings and the surrounding environment to ensure that the access needs of all sectors of the community are met.
- 4.6.9 The Greater London Authority and Transport for London responded to highlight the additional capacity and connectivity that the Borough will benefit from through Cross Rail 2, which in turn could assist in delivering higher levels of growth in appropriate locations.

4.7 Sustainability Appraisal

- 4.7.1 Sustainability Appraisal (SA) is a process undertaken during the preparation of a plan, programme or strategy. The role of the SA is to assess the extent to which the emerging policies and proposals will help to achieve relevant environmental, social and economic objectives and aims to ensure that sustainable development is at the heart of the plan-making process.
- 4.7.2 To ensure this is achieved Officers prepared a Sustainability Appraisal Scoping Study which identifies the key sustainability issues facing the Borough. It also establishes a framework for how the SA for the Local Plan update will be conducted. Following the preparation of the Scoping Study the Sustainability Appraisal Report (SAR) was undertaken to provide the initial assessment of the policy options, specifically in terms of identifying an appropriate housing strategy.
- 4.7.3 The Council consulted the relevant environmental authorities⁵ and other interested stakeholders on both documents. In total 4 responses were received, 2 from statutory environmental authorities, 1 from an interest group and 1 from a house builder. Table 8 below provides a summary of the responses received along with officer comments.

Ref	Name/ Organisation	Summary of Response	Officer Comments
SA1	Natural England	No specific comments made on the Sustainability Appraisal	N/A.
SA2	Environment Agency	<p>Pleased to see that our key areas of concern have been addressed including adapting to the changing climate, reducing flood risk and improving the water quality of rivers and groundwater.</p> <p>Welcome the acknowledgement of the negative impact that loss of open space and land outside the built up area could have on the availability of natural storage and hence flood risk from all sources.</p> <p>The fluvial flood risk to property in the Borough is not widespread; this is largely due to the availability of open green space in much of the river corridor and the current lack of development on the majority of the flood plain areas.</p> <p>New development in the areas of higher flood risk close to the rivers</p>	<p>Noted.</p> <p>An update to the Borough's Strategic Flood Risk Assessment (SFRA) is due to commence. This will also take into account the most recent climate change scenarios.</p>

⁵ The Environment Agency, Historic England and Natural England

		<p>would be likely to reduce the amount of flood storage, potentially increasing the risk both on and off site. It is especially important that the sequential approach is followed in allocating sites for development.</p> <p>All EA maps and data sets are regularly reviewed and updated so it's important the latest data to inform the evidence base for the local plan.</p>	
SA3	Epsom & Ewell Cycling Action Group	<p>It appears that the wording of the Objectives may affect the weight given to each of the Options.</p> <p>Feel in the wording of Objective 4 there is no encouragement, unlike the Local Plan, to minimise car use. Sustainable transport can be, and is interpreted not only as electric cars, but also non-diesel cars.</p> <p>Wish Sustainability Appraisal Report Objective 4 to be amended: after the word 'travel' insert:</p> <p>'in particular, to promote cycle and walking provision'.</p>	<p>Noted. It is the intention of the objective to 'encourage sustainable transport options' which would include cycling and walking provision. The decision aiding questions which are used to help assess the options against the objectives include "Will the option....Help provide walking / cycling / public transport infrastructure, including choice and interchange?" These decision aiding questions are currently contained in the Sustainability Appraisal Scoping Report. Providing these in future as part of the Sustainability Appraisal Report would help to address this matter.</p>
SA4	Dandara	<p>Understand that the SA is a strategic document but felt that some of the assumptions made regarding Green Belt release, are overly simplistic.</p>	<p>Noted. The assumptions reflected the level of detail of each option. These will be considered in more detail at the next stage.</p>

Table 8: Summary of written responses received and officer comments on the Sustainability Appraisal Scoping Report and Sustainability Appraisal Report

5 Next Steps

- 5.1.1 This report in conjunction with Consultation Questionnaire Responses report presents a summary of the feedback from the Issues & Options Consultation (Regulation 18) on the review of the Local Plan. The reports will be submitted to the Licencing & Planning Policy Committee (L&PPC) for Members to consider and approve for publication.
- 5.1.2 The next steps in the preparation of the update to the local Plan will be to develop a preferred strategy and produce a draft plan. The draft plan will take into consideration the comments received as well as the site promotions. Comments will be invited on the draft pre-submission plan, which will be considered by an Independent Inspector at an Examination in Public.

Appendix 1- Summary of Minutes from Local Plan Members Drop in Sessions

Date of Drop in Session	Attendees	Summary of Minutes
4 October 2017 -3:30pm	<p>Councillor Michael Arthur</p> <p>Rachael Thorold – Senior Planning Policy Officer</p> <p>Karol Jakubczyk – Planning Policy Manager</p>	<p>The following provides an overview of the Surgery Session arranged for Cllr Michael Arthur, who wished to clarify a number of issues relating to the current Issues & Options Consultation, the Housing White Paper (HWP) and the government’s Objectively Assessed Housing Needs (OAHN) targets.</p> <p>Discussion Councillor Michael Arthur raised the following matters:</p> <ol style="list-style-type: none"> 1. OAHN/ housing target: <ul style="list-style-type: none"> ➤ Cllr MA asked question on the time period that the emerging local plan housing policies will cover. He sort specific clarification on the start date being used; namely 2015. ➤ Cllr MA followed up this question with an enquiry as to whether the Borough Council would be able to call-upon past delivery rates – whether these would have apposite impact on our ability to meet the OAHN. It was noted that past successes in delivery could, unfortunately, not be relied upon to help the Borough Council. Officers noted that the emerging position was perverse – namely, our reward for past success was an increasingly higher OAHN. It was noted the government’s methodology places too much weight on past housing delivery trend in calculating future demand. It has been noted that this is a poor mechanism to ‘plan’ for future growth – notably because it does not take account of current on-the-ground conditions – such as capacity and land supply. ➤ Cllr MA concluded his line of questioning on housing numbers by asking about the HWP and its relationship to the current government consultation – namely that the current consultation is a direct outflowing of the proposals set out in the HWP. 2. Issues & Options Consultation Paper Question 3 Adding new sites to the Green Belt: <ul style="list-style-type: none"> ➤ Cllr MA asked Officers to run through the possible additions, as identified by the Green Belt Study Phase 1, to the Green Belt. Officers noted that these are a) Nonsuch Park; b) Woodcote Grove office campus; c) the Ridge; and d) Land (former quarry) at Beverly Close. There was a brief discuss on these four possible additions.

		<ul style="list-style-type: none"> ➤ Cllr MA suggested that the Borough Council should also consider the addition of the Hogs Mill Strategic Open Space to the Green Belt. <p>3. Issues & Options Consultation Paper Question 9 Promoting sites for development:</p> <ul style="list-style-type: none"> ➤ RT clarified that this question seeks opinions on possible sites for new housing that are either within or outside of the Green Belt. Obviously those sites identified as currently being within the Green Belt would need to be assessed on their continued performance (against the purposes of the Green Belt). ➤ There was a discussion as to how the Borough Council could consider potential sites for new housing identified under this question. <p>4. Mill Road site, Epsom:</p> <ul style="list-style-type: none"> ➤ Cllr MA sought clarification on the status of this site. RT noted that the site remains identified in the SHLAA, although given the scale of the OAHN the Borough Council may wish to revisit the quantum of housing identified for the site, as to whether it continues to be an efficient use of the site. <p>5. Revised Strategic Housing Land Availability Assessment (SHLAA):</p> <ul style="list-style-type: none"> ➤ Cllr MA noted that the number of sites identified within the latest version of the SHLAA was less than in the original. KJ noted that this was intentional and responded to the enhanced emphasis by government that housing sites be available, deliverable and developable. It was noted that many of the sites identified by the original document had not come forward – and that upon further assessment it was determined that their future availability (as sources of supply) was found to be questionable. ➤ Cllr MA asked whether the TAVR Barracks site was included in the latest version of the SHLAA? RT clarified that it is included as the landowner (the State) had gone on record as stating that the site was likely to come forward, albeit later in the local plan period.
<p>24 October 2017- 4pm</p>	<p>Councillor Tina Mountain Rachael Thorold – Senior Planning Policy Officer</p>	<p>The following provides an overview of the Surgery Session arranged for Cllr Tina Mountain, who wished to discuss opportunities of housing land within the built up area and the government’s Objectively Assessed Housing Needs (OAHN) targets.</p> <p>Discussion</p>

	<p>Mark Berry- Head of Place Development</p>	<p>Councillor Tina Mountain raised the following matters:</p> <ol style="list-style-type: none">1.Current housing land supply:<ul style="list-style-type: none">➤ Overview of the findings of the Strategic Housing Land Availability Assessment (SHMA)2.Search for opportunities within the built up area for housing land:<ul style="list-style-type: none">➤ Consideration of employment sites and industrial areas. Reflected upon the potential issues with compatibility with industrial uses and current policy to protect employment uses.➤ Discussion of comprehensive development opportunities within the town centre along the High Street; the constraints of the conservation area designation, multiple ownership and the on -going trend for first floor and above floors to be converted into residential were discussed.3. OAHN/ housing target :<ul style="list-style-type: none">➤ Clarified how housing need has been identified (through the Strategic Housing Market Assessment (SHMA)) and the government's proposed standard methodology.➤ Consideration to whether the 579 need figure produced by the government's proposed standard methodology can be challenged. Officers outlined the forthcoming response to the consultation document due to be considered at the L&PPC 25 October 2017
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Appendix 2- Summary of Minutes from Local Plan Question & Answer Sessions

Date of Meeting	Attendees	Summary of Minutes
16 October 2017 10:30 am	Campaign to Protect Rural England Tim Murphy-CPRE Sarah Clayton-CPRE Colin Taylor-CPRE Kathy Chetwyn- CPRE Rachael Thorold – Senior Planning Policy Officer Karol Jakubczyk – Planning Policy Manager	<p>The following provides an overview of the Local Plan Question & Answer Session with Champaign to Protect Rural England (CPRE).</p> <p>Discussion:</p> <p>CPRE raised the following matters:</p> <ol style="list-style-type: none"> 1. No real challenge to OAHN figure: <ul style="list-style-type: none"> ➤ Discussion on the OAHN methodology and the previous assumptions that it is a starting point and not a housing target with the ability to go up or down based on constraints. ➤ TM reiterated that CPRE will continue to challenge the OAHN unconstrained approach ➤ Discussion in relation to the Waverley local plan examination, with particular reference to how the PINS Inspector intervened in the process. ➤ CPRE advised that they had met with Chris Grayling MP, who had shared a letter from Sajid Javid MP SoS of 9 October 2017 in relation to housing provision. TM had circulated the letter prior to the session. ➤ JK confirmed that the Council is responding to the current government consultation; Planning for the right homes in the right places. The response will be subject to approval at the special LPCC meeting of 26 October 2017. ➤ RT advised that there will be the remaining issue of unmet housing need. 2. Responding to Sajid Javid’s MP SoS Letter: <ul style="list-style-type: none"> ➤ TM advised that CPRE would be issuing a public rebuttal to the letter and asked if the Council would be doing the same. ➤ KJ advised that he would need to take advice to whether it would be appropriate as the letter was correspondence between 3rd parties.

		<ul style="list-style-type: none">➤ Recent case law, plan examinations and the HWP indicates that the 'exceptional circumstances' to amend the Green Belt boundary through the local plan are centred around meeting housing need. <p>3. Unmet OAHN:</p> <ul style="list-style-type: none">➤ Discussion to whether the unmet OAHN could be accommodated elsewhere within the housing market area or beyond. <p>4. Building affordable homes:</p> <ul style="list-style-type: none">➤ TM stated the SHMA identifies an high affordability need➤ Future housing developments must deliver affordable homes.➤ TM strongly advocated that the SCC Joint Venture sites (1 has been identified within Epsom) must solely deliver social affordable housing. <p>5. Infrastructure:</p> <ul style="list-style-type: none">➤ Discussion in relation to the implications on infrastructure and infrastructure planning and delivery.➤ SC advised that existing infrastructure was under significant pressure.➤ TM made reference to the Surrey County Council Infrastructure Study which is being updated.➤ KJ advised that ensuring the provision of supporting infrastructure was central to ensuring the delivery of sustainable growth. However, the NPPF and recent local plan examinations make it clear that infrastructure issues are not an absolute constraint to development. <p>6. Consultation:</p> <ul style="list-style-type: none">➤ RT & KJ advises how the consultation had been advertised.➤ RT advised that Officers had been working closely with Members and community groups such as CPRE in preparing the Issues & Options document and evidence base.➤ RT advised that Officers had been holding Q&A sessions for community groups and attending local public meetings.➤ KJ advised that it was extremely beneficial to utilise existing community networks including the Resident Association networks.
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		<ul style="list-style-type: none"> ➤ TM advised that CPRE may undertake a local leaflet drop to raise the profile of the consultation.
19 October 2017- 2pm	<p>Epsom Civic Society (ECS)</p> <p>Carol Reed-ECS</p> <p>Alan Baker-ECS</p> <p>Rob Austen-ECS</p> <p>Mark Bristow-ECS</p> <p>Angela Clifford-ECS</p> <p>Ishbel Kenward-ECS</p> <p>Margaret Hollins-ECS</p> <p>Rachael Thorold – Senior Planning Policy Officer</p> <p>Karol Jakubczyk – Planning Policy Manager</p>	<p>The following provides an overview of the Local Plan Question & Answer Session with Epsom Civic Society:</p> <p>Discussion:</p> <ol style="list-style-type: none"> 1. Consultation and raising awareness of the local plan Issues & Options: <ul style="list-style-type: none"> ➤ RT & KJ advised how the consultation had been advertised. ➤ RT advised that Officers had been working closely with Members and community groups such as CPRE in preparing of the Issues & Options document and evidence base. ➤ RT advised that Officers had been holding Q&A sessions for community groups and attending local public meetings. ➤ KJ advised that it was extremely beneficial to utilise existing community networks including the Resident Association networks. ➤ ECS advised they will be having an open meeting end of October/ early Nov to discuss the consultation with their members and that ECS would be promoting the society on Saturday 28th October in the Ashley Centre. RT &KJ offered their support and attendance at the open meeting. 2. Plan making process and programme: <ul style="list-style-type: none"> ➤ RT & KJ outlined where the Council was its plan making process, including why there was the need to review the Local Plan and the implications of the outcomes of the key evidence base studies. ➤ RT highlighted the further work that is being undertaken on constraints and infrastructure. 3. Addressing Unmet Housing Need <p>KJ &RT raised the issue of responding to unmet housing need. Discussion of the Duty to Co-operate and current work being undertaken with Housing Market Area partners.</p> 4. Infrastructure: <ul style="list-style-type: none"> ➤ Discussion in relation to the implications on infrastructure and infrastructure planning and delivery. Agreed that the existing infrastructure was under significant pressure.

		<ul style="list-style-type: none"> ➤ RT advised that highway modelling was underway. ➤ RT advised that the Surrey County Council Infrastructure Study was being update based on the 418 homes per year and is likely to identify some significant funding gaps. ➤ KJ advised that ensuring the provision of supporting infrastructure was central to ensuring the delivery of sustainable growth. However, the NPPF and recent local plan examinations make it clear that infrastructure issues are not an absolute constraint to development. <p>5. Discussion on Option1 : Intensification</p> <ul style="list-style-type: none"> ➤ Need to fully consider the implications of changing the current assumptions on car parking standards, room sizes, allotments, conservation areas and garden sizes as well as densities and building heights. <p>6. Cross Rail 2:</p> <ul style="list-style-type: none"> ➤ Need to consider the growth expectations of Cross Rail 2 before its implementation at the end of the plan period. ECS highlight how this could change the economic profile of the Borough and attract new business as well as housing. ECS advised of the need to ensure a balanced borough. ➤ KJ advised that the potential impact of Cross Rail 2 was being reflected in some of the proposals coming forward around Stoneleigh and Ewell West & East stations in particular. <p>7. Next Steps:</p> <ul style="list-style-type: none"> ➤ ECS responding to the consultation ➤ ECS input in the Local Plan evidence base ➤ Commitment to continued engagement.
<p>23 October 2017 -10am</p>	<p>Standing Committee of Residents' Associations (SCoRA) Hugh Ricketts- Chairman of SCoRA</p>	<p>The following provides an overview of the Local Plan Question & Answer Session with the Standing Committee of Residents Association:</p> <p>Discussion:</p> <ol style="list-style-type: none"> 1. Understanding the role of SCoRA <ul style="list-style-type: none"> ➤ HR outlined the role of SCoRA.

	<p>Rachael Thorold – Senior Planning Policy Officer</p> <p>Mark Berry- Head of Place Development</p>	<p>2. Plan making process and programme:</p> <ul style="list-style-type: none"> ➤ RT & MB outlined where the Council was its plan making process, including why there was the need to review the Local Plan and the implications of the outcomes of the key evidence base studies. ➤ RT outlined the current annual housing target (181) and the OAHN figures produced by the SHMA (418) and by the government’s proposed standard methodology (579). <p>3. Infrastructure</p> <ul style="list-style-type: none"> ➤ HR advised that investment was too often demand led and not plan led. ➤ HR advised that health and education should be considered ➤ RT advised that highway modelling was underway and that the Surrey County Council Infrastructure Study was being updated based on the 418 homes per year and is likely to identify some significant funding gaps. ➤ MB advised that efforts are being made to engage with the relevant health and school operators and bodies. <p>4. Promoting engagement in the local plan preparations</p> <ul style="list-style-type: none"> ➤ HR advised that promote the consultation to SCoRA members ➤ RT offered to attend RA meetings and that to date officers had attended 2 x RA meeting upon request.
<p>27 October 2017- 10am</p>	<p>Bernie Muir Surrey County Councillor</p> <p>Mr Garrett Doran</p> <p>Rachael Thorold – Senior Planning Policy Officer</p>	<p>The following provides an overview of the Local Plan Question & Answer Session with Bernie Muir Surrey County Councillor:</p> <p>Discussion:</p> <p>1. Consultation and raising awareness of the local plan Issues & Options:</p> <ul style="list-style-type: none"> ➤ GD advised he did not consider the consultation was sound. ➤ RT & KJ advises how the consultation had been advertised.

	<p>Karol Jakubczyk – Planning Policy Manager</p>	<ul style="list-style-type: none"> ➤ RT advised that Officers had been working closely with Members and community groups such as CPRE and ECS in preparing the Issues & Options document and the evidence base. ➤ RT advised that Officers had been holding Q&A sessions for community groups and attending local public meetings. ➤ KJ advised that it was extremely beneficial to utilise existing community networks including the Resident Association networks. <p>2. Vision:</p> <ul style="list-style-type: none"> ➤ BM commented that the Council had no vision for the Borough and advised that she thought Epsom town centre was failing and that the Borough lacked identity or uniqueness. ➤ BM stated that the Local Plan needed to be clear on who Epsom was for, the type family it wished to attract and who the new homes would be for. ➤ RT & KJ sought to advise that the housing need was outlined in the SHMA and there was not the mechanism for the Local Planning to prescribe what type of family or person could reside in the Borough and live in the new homes. ➤ RT sought to provide advice on the purpose of the local plan and the remit of the update. <p>3. Design: Conservation Area, Shopfronts and roof profiles</p> <ul style="list-style-type: none"> ➤ BM advised that there have been no examples of good design within the Borough and that any new development should adhere to prescribe design codes including restrictions on roof profiles in conservation areas. ➤ KJ sought to advise that design was subjective and to accordance with national planning policy design codes could not be prescriptive. ➤ RT advised that she would circulate the Council's current conservation, design and shopfront policies. <p>4. Town centre sites:</p> <ul style="list-style-type: none"> ➤ GD advised that town centre sites should be walkable and that he would of expected that would deliver the shortfall in housing. ➤ RT advised that town centre development sites (as per Plan E) had been included in the Borough land supply position and it was important not to overestimate their capacity.
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<p>23 November 2017-2pm</p>	<p>Surrey County Council: Kath Harrison- Spatial Planning, SCC</p> <p>Steve Howard-Transport Policy & transport Strategy Manager, SCC</p> <p>James Green-SCC</p> <p>Nick Healey-SCC</p> <p>Gemma Joyner-Principal Transport Planner, SCC</p> <p>Rachael Thorold – Senior Planning Policy Officer, EEBC</p> <p>Karol Jakubczyk – Planning Policy Manager, EEBC</p>	<p>The following provides an overview of the Local Plan Session Surrey County Council colleagues in relation to the impact of growth on the highway and transport network:</p> <p>Discussion:</p> <ol style="list-style-type: none"> 1. Review of the Local Plan <ul style="list-style-type: none"> ➤ KJ outlined where the Council was in reviewing its local plan and its housing target based on the OAHN figures. ➤ KJ briefed SCC colleagues on the 4 options put forward in the consultation. ➤ RT advised that land supply was current a constraint despite call for site exercises. 2. Understanding the highway capacity <ul style="list-style-type: none"> ➤ Evidence is indicating that the road network is at capacity to support the private motor vehicle at peak travel times. ➤ Agreed that are limited opportunities to increase that capacity (in terms of the availability of land and funding). 3. Reviewing existing assumptions on future travel patterns <ul style="list-style-type: none"> ➤ Question where there is a need to take a proactive approach to getting people out of their private motor cars and on to sustainable travel modes ➤ Discussion to whether the next generation will be so wedded to private motor vehicle 4. Considering an appropriate strategy <ul style="list-style-type: none"> ➤ Acknowledged that there is no coherent strategy across Surrey in relation to congestion.

		<ul style="list-style-type: none">➤ Investment in cycle networks (at approx.£15 per head per annum) and sustainable travel modes such as improving bus services (in particular user's perceptions on reliability and user confidence) would provide much greater cost / benefits. However, the benefits (the modal shift) would be delivered over a long period of time.➤ Need to consider holistic schemes that would also deliver public realm improvements.➤ Need to managing trips generated from schools- need for greater travel plans and modal shift.➤ Discussion on the assumptions relating to future parking standards – including electric charging points. Consideration of whether the current parking standards would enable modal shift.
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Appendix 3- Summary of all Written Responses Received and Officer Comments

Ref	Name/ Organisation	Summary of Response	Officer Comments
IO1	Surrey and Borders NHS	<p>The Council are already aware of our presence at the former West Park Hospital and may already have part of this earmarked for future possible residential development.</p> <p>If looking at altering the local Green belt or conservation area designations then there may be scope in three to five years' time to develop additional land at the old West Park location and also at the nearby St Ebba's Hospital site.</p> <p>This is dependent on ability to provide our services from alternative accommodation and it could be speculate that some services can move off-site into an office building whilst it may be necessary to retain some part/s of the sites to re-provide social care and/or in-patient and/or therapies work.</p> <p>Promote sites for housing.</p>	<p>Noted.</p> <p>The Council will consider the sites through the local plan preparations but note the degree of uncertainty relating to the availability of these sites.</p>
IO2	Natural England	<p>Have little comment to make at this high level stage. However, support the intensification of the urban area with the use of tall buildings where there are minimal landscape impacts and no increase of the building footprint. This avoids the loss of greenspace in the urban area while providing additional housing and minimising the need for additional grey infrastructure.</p> <p>We would like you to avoid the loss of greenspace and associated biodiversity loss that would occur if land is removed from the Green Belt. However, in some cases, and by employing best practice urban design (50% greenspace), it may be possible to allocate a small number of housing sites adjacent to existing development that could result in a biodiversity net gain for the Borough and provide people with access to nature.</p> <p>Submission provides information on the natural environment and issues and opportunities for local plan preparation.</p>	<p>Noted.</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
IO3	Ms Aileen Widdowson	<p>Proposed methodology for calculating housing need is flawed and should be challenged.</p> <p>No evidence that increasing supply of homes will affect affordability.</p> <p>Suggest joint working with local planning authorities facing similar challenges</p> <p>Offer of further assistance.</p>	<p>Noted. National planning policy requires local planning authorities to prepare local plans on a foundation of evidence. One of the key pieces of evidence of our Issues & Options Consultation is the SHMA. National planning policy requires us to prepare our SHMA in a very specific way. If we failed to do this we would run the high risk of our Local Plan being found unsound.</p> <p>Officers have some sympathy with the suggestions that the government's calculations for future housing artificially inflate the scale of demand. Our response to the government's "Planning for the right homes in the right places" consultation included robust comments on the shortcomings of their proposed changes to our national planning system.</p> <p>The Council is proactively engaging with its Housing Market Area (HMA) partnering authorities as well neighbouring authorities in Surrey.</p>
IO4	Mr Alan Jones	<p>Essential parks and fields such as Shadbolt Park should be maintained.</p> <p>There are a lot of green spaces in and around this ward [Cuddington] that are not accessible to the public. These could be used for house building</p>	<p>Noted.</p> <p>The Council will consider those sites within its boundary through the local plan preparations.</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
		<p>Note alliance with neighbouring boroughs and identify sites that could be used for housing:</p> <ul style="list-style-type: none"> -Brownfield site at North Cheam (vacant shopping precinct & public house) -Land at Grafton Road, next to Linden Bridge School -Surbiton Town Sports Club -Adams yard, Worcester Park Road -Hook Rise South (along A3 heading South) 	It should be noted that land at Grafton Road (SHLAA ref:331) has already been identified as an opportunity site.
IO5	Aly Smith	Questionnaire response	N/A
IO6	Mr Andrew Crosbie	<p>Housing in Worcester Park has been 'densified'. Properties are being extended to create 5 & 6 bed properties.</p> <p>The existing road network is too narrow to accommodate modern motor vehicle.</p> <p>New housing should have at least two car parking spaces and roads wide enough to accommodate fire appliance and on street parking.</p> <p>Small parks, such as Shadbolt Park should be protected as they are well used.</p>	Noted.
IO7	Ms Audrey Fennell	<p>Accept the need for more housing in the Borough.</p> <p>Strongly disagree with the idea of a Local Plan which would threaten Shadbolt Park a very important and well-used local amenity space. The loss of Shadbolt Park would negatively impact upon the quality of our lives out of all proportion to the scale of any possible development benefit.</p>	Noted.
IO8	Plot holders at Banstead Road	Promote of Plots at Banstead Road for residential development.	The Council will consider the site through the local plan preparations.

Ref	Name/ Organisation	Summary of Response	Officer Comments
IO9	Cllr Chris Frost	Questionnaire Response	N/A
IO10	CPRE	<p>Considered there should have been greater publicity of the consultation and a longer consultation period.</p> <p>Fully understands the dilemma faced by Epsom and Ewell Council which wishes to meet housing need in the Borough whilst protecting the area's character and preserving its biodiversity, amenity and recreational areas.</p> <p>Believes there is widespread support within the local community for the current plan's strong commitment to protection of the Green Belt.</p> <p>Within the development plan process there appears to be a prioritising of economic development, with weaker safeguards for social and environmental factors.</p> <p>The Green Belt should be the exceptional circumstance for not meeting housing need. The Green Belt Study underplays the performance of the Borough's Green Belt which also contributes to the fifth purpose of Green Belt in relation to its role in ensuring the regeneration of urban areas [as set out in the NPPF].</p> <p>Do not support the SHMA or the Government standard methodology as it taken into housing demand generated from outside of Epsom & Ewell. The publication of the standard methodology should have resulted in the deferral of the consultation.</p> <p>Should only seek to meet the OAHN figure relating to affordable housing [274 per annum as set out in the SHMA] as this 'true need' and this can be accommodated on brownfield sites.</p> <p>LPA should explore every opportunity to borrow money to enable it and housing associations to build social housing to rent or buy on publically owned land.</p> <p>Highlight the findings of the Surrey Infrastructure Study and agree with the conclusions of the Infrastructure Factsheet. Suggests that all local authorities</p>	<p>The consultation was publicised by various methods before and during the consultation period, including the proactive engagement with local community groups. Officers were able to engage with a significant number of residents through local public meetings and the number of responses received was one of the highest the Council had achieved when preparing planning documents. The 6 week timeframe for the consultation accorded to the statutory requirement. The questionnaire was available to be completed for an additional week.</p> <p>Notes the concern raised in relation to the options and the questionnaire. The Council worked hard to produce an issues & options consultant paper and questionnaire that responded to the difficult and complex challenges facing the Local Plan update that would be easy for residents to engage with.</p> <p>Notes CPRE's views in relation to the SHMA methodology and the Government's proposed standard methodology. However, without the identification of an unbiased housing need figure (in accordance with national planning policy and guidance)</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
		<p>and MPs need to impress on central government the importance of this infrastructure funding deficit.</p> <p>Do not agree with the proposed Options as not all have the option of not meeting housing need in full, or the questionnaire.</p> <p>Thank Epsom & Ewell Council for on-going engagement with CPRE.</p>	<p>the local plan update will not be found sound. The CPRE are encouraged to raise these concerns with Department of Communities and Local Government.</p> <p>The demand for homes does not respect local authority boundaries and there is no mechanism for the Council to dictate who resides in the Borough and occupies new homes.</p> <p>The Council maintains that the Green Belt Study, produced by an independent consultant is sound and supports its findings.</p> <p>The outcomes of the review of key local plan evidence base studies, indicate that the current local plan policies in relation to housing are out of date. Government have been clear that local plans must be up to date and have provide a deadline of March 2018 for this to be achieved. As outlined in the local Plan Programme, the Council is working to an ambition timetable to update the Local Plan to respond to this required.</p> <p>The Council is of the view that the publication of the government's propose standard methodology did not warrant the deferral of the consultation as the issues and challenges facing the</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
			<p>local plan update remained the same. Furthermore, the consultation document made reference to the government's consultation and acknowledged the proposed need figure it generated.</p> <p>Unnecessary delay to the local plan update, continues to place the local planning authority and its ability to make sound decisions in a vulnerable position. As outlined in the consultation document an out of date local plan increasing the risk of predatory planning applications and government intervention.</p> <p>The Council is exploring the potential establishment of property vehicle to deliver new housing. The success of such a solution is dependent upon government providing local authorities with the necessary tools, to finance the purchase and development of sites.</p> <p>Agree that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
IO11	Dandara	<p>Support the recognition throughout the consultation of the need to review the existing housing target.</p> <p>SHMA needs to be kept up-to-date including substituting the 2012-based population and household projections for the more recent 2014 iterations. Note that it is clearly the intention of the Council to keep the evidence base up-to-date as the LPIO already refers to the current DCLG consultation.</p> <p>Welcome recognition of the challenges posed by the existing housing market and future housing need.</p> <p>When reviewing Green Belt boundaries, it is evident that the four options accord with the sequential approach advocated within the 2017 White Paper in relation to Exceptional Circumstances (para, 1.39, Fixing our Broken Housing Market).</p> <p>When considering in more detail what could constitute exceptional circumstances the three dimensions of sustainable development set out in para. 7 of the NPPFs should be applied.</p> <p>Option 1-No objection to the principle of making the best and most efficient use of previously developed land and underused land within existing settlement boundaries. Agree that this option in isolation would not achieve sustainable development.</p> <p>Option 2- Support a detailed review of the Green Belt boundary to identify areas potentially suitable for new homes and supporting infrastructure.</p> <p>Important that Stage 2 Green Belt Study assesses the contribution that individual deliverable sites submitted via the 'call for sites' exercise regardless of the performance of the wider strategic parcel as assessed at Stage 1. Need to recognise that land falling within a wider parcel can have a very different Green Belt function compared with the wider parcel.</p> <p>Option 3- Support the principle of meeting full, OAHN but clearly there will be elements of the Green Belt that have a fundamental role. The overall objective should be to strike a balance that allows sustainable development</p>	<p>Noted.</p> <p>The Council's Annual Monitoring Reports show that the scale of new homes required to be delivered by the industry consistently each year, to meet the housing needs figures have never been achieved in Epsom & Ewell. This includes during the peak of the delivery of the hospital sites and town centre developments.</p> <p>Modernise or Die: The Farmer Review of the UK Construction Labour Model (2016) highlights a number of significant challenges facing the house building industry to secure its long-term future.</p> <p>The Council will consider the site through the local plan preparations</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
		<p>and strikes an appropriate balance with the social role of sustainable development.</p> <p>Caution the suggestion that it is “highly questionable that house builders would be able to deliver the number of houses planned for in the Plan period” (pg. 9). This is not evidenced and as very few new homes have been delivered over the past decade, due partly to the maintenance of existing Green Belt boundaries, coupled with high house prices and associated demand.</p> <p>Option 4- Considered to be effectively the sequential result of a sensible option 1 and option 2.</p> <p>Support the recognition that the Council has and will continue to engage with partner Authorities within the HMA and beyond, which should include the Greater London Authority.</p> <p>Understand that the SA is a strategic document, it is felt that some of the assumptions made regarding Green Belt release, are overly simplistic.</p> <p>Promotes Land at Downs Farm for development.</p>	
IO12	Dr Edward Willhoft	<p>Epsom has a low allocation of Green Belt and high housing and population density, especially when compared to boroughs such as Waverley.</p> <p>The housing need figures are disproportion and appear to be an unreasonable and intrusively large housing imposition for the Epsom & Ewell Borough Council.</p> <p>There is a need to plan for housing but proportionate to current population densities and extent of Green Belt land.</p>	Noted.
IO13	Elmbridge Borough Council	<p>Commitment to work with EEBC and other authorities to ensure that the best and most sustainable sites are brought forward for development that other strategic planning matters are continuously addressed with the key principles of sustainable development at the forefront.</p>	Noted.

Ref	Name/ Organisation	Summary of Response	Officer Comments
		<p>Acknowledge the difficulties and challenges of delivering sustainable development and responding to development needs. Support the pragmatic approach being undertaken by EEBC in seeking to meet their identified development needs; considering a range of options and the acknowledgement that a combination of them might be appropriate.</p> <p>Providing that all realistic options to meet its development needs are explored, we do not necessarily consider it appropriate at this stage to comment on how best / which option is most suitable.</p> <p>Welcome on-going discussions in relation to unmet development needs across the Housing Market Area and the preparation of a Statement of Common Ground.</p> <p>Understand that further work and assessments are planned to see if there is land within the broad areas of such suitable for housing. The Council would welcome the opportunity to comment on any further Green Belt studies.</p>	<p>Welcome commitment to on- going discussions and co-operation.</p>
IO14	Ms Emma Young	<p>Nonsuch Park should not developed for housing.</p> <p>Council needs to be purchasing property. There are plenty of houses and land, question is it is being used.</p>	<p>Noted.</p> <p>The Council is exploring the potential establishment of property vehicle to deliver new housing. The success of such a solution is dependent upon government providing local authorities with the necessary tools, to finance the purchase and development of sites.</p>
IO15	Environment Agency	<p>The evidence needs to consider the Borough Strategic Flood Risk Assessment (SFRA), Preliminary Flood Risk Assessment (PFRA), Environment Agency Flood Maps, Flood Risk Management Plan (FRMP), Surface Water Management Plan (SWMP) and Surrey's own Flood Risk management Strategy 2017-20.</p>	<p>Noted.</p> <p>Welcome Environment Agency's commitment to review sites put forward for development.</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
		<p>Keen to review any sites which are put forward for development to ensure that flood risk and history of flooding of these sites are fully considered at the earliest opportunity.</p> <p>Seek to ensure:</p> <p>Policies and allocations within the Local Plan ensure no inappropriate development is located in areas at high risk of flooding and that</p> <ul style="list-style-type: none"> • Local Plan ensure development in areas at risk of flooding will be safe without increasing flood risk elsewhere • Local Plan contribute to reducing flood risk for existing communities • The council identify the risk of flooding from all sources through their Strategic Flood Risk Assessment (SFRA) and under the Duty to Cooperate work to manage and resolve any cross-boundary risks. 	
IO16	Epsom Civic Society	<p>Publication of the consultation could have been greater.</p> <p>Seek to maintain the character of the Town and oppose high buildings.</p> <p>Support improved provision of affordable homes and social housing.</p> <p>Support a 'reasonable' target for new homes but question the central government's current target of 579 per annum. This unachievable and undesirable and must be rejected.</p> <p>No support for Option1 as opposed to tall buildings and need to maintain Epsom's heritage and character. Need to seek to encourage the continued improvement of public spaces, green spaces, parks and gardens in the town. Favour mainstreaming of Green Infrastructure into development plans.</p> <p>Society's policy is to preserve the Green Belt. In seeking to find solutions for the increase in housing provision, the adoption of policies with potential adverse impacts on significant natural environments and open spaces is a serious concern.</p>	<p>The consultation was publicised by various methods before and during the consultation period, including the proactive engagement with local community groups. Officers were able to engage with a significant number of residents through local public meetings and the number of responses received was one of the highest the Council had achieved when preparing planning documents.</p> <p>Noted.</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
		<p>Query the effectiveness of Green Belt release in terms of delivering sufficient homes to meet established need at reasonable cost and the likelihood of the need for increased provision of the associated infrastructure. Society does not support Options 2& 3.</p> <p>Support balanced, well designed and sustainable development in the Borough and therefore Option 4 as is the only option with the prospect of protecting the Borough's character and distinctiveness while enabling Epsom to both improve and grow as a place to live, work and enjoy.</p>	Welcome on going engagement with ECS.
IO17	Epsom Club	<p>There is much work still to be done and many careful decisions have yet to be made so that Option 4' Finding the Balance' must be the choice at this time.</p> <p>Building higher may be one solution and may be possible in limited areas but many of us do not like the effect in Station Road which has clearly spoil the approach from the railway.</p> <p>Reviewing Green Belt boundaries may give a very limited opportunity and certainly working with neighbouring boroughs may yield some result.</p> <p>There must be some areas that developers do not find profitable but they should be encouraged to use.</p> <p>Consideration of building above railway lines, similar to proposals in London Boroughs.</p>	Noted.
IO18	Epsom Common Association	<p>Pleased that the Council recognises the importance of these various protections relating to Epsom Common and trust any pressure to circumvent them will be resisted.</p> <p>Thank the Council for its commitment to the long term future of the Common demonstrated by the adoption of the 2016-2116 management plan.</p>	<p>Noted.</p> <p>The Primary Constraints Study which forms part of the Local Plan evidence base identifies the environmental designations which would prevent development taking places as the impact from the same could not be</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
		<p>Note the statutory duty placed on the Council by the Natural Environment and Rural Communities Act 2006 to have regard to the purpose of conserving biodiversity.</p> <p>The main part of the Common borders on Ashtead Common, the two Commons making a large area of high quality nature reserve, which is also of great recreational value.</p> <p>To the east the Common borders on areas of houses with gardens, these are presumably unlikely to change greatly, as presumably is The Wells estate within the Common.</p> <p>To the north there is green belt land comprised of the former hospital sites now redeveloped as housing and Horton Country Park. This large area of green space is valuable to Epsom Common in at least two ways: providing a recreational area, thus reducing visitor pressure on the Common, and providing a continuation of some of the habitats of the Common.</p> <p>Within this area are two large sites (SHLAA 2017 ref: 269 and part of 569) we expect their importance as wildlife corridors connecting the Common to Horton Country Park should be respected and development planned to maintain this connection. Larger scale development of either the hospital sites or Horton Country Park would certainly risk damage to the Common.</p> <p>Part of the Common is bordered to the south and west by the Green Belt land of the Woodcote Stud. Any substantial development here would also likely be damaging to the Common and should not be considered a potential site for housing.</p>	mitigated. This study was material when assessing sites for their suitability for development.
IO19	Ms Erica Gill	Questionnaire Response	N/A
IO20	Ewell Village Residents Association	<p>Population density has increased, investment in the essential infrastructure and utilities has failed to keep up.</p> <p>The residents attending our packed public meeting fully understand the need for more affordable housing, (and more more-affordable housing) but</p>	Agree that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the

Ref	Name/ Organisation	Summary of Response	Officer Comments
		<p>conclude that the overall number of dwellings must now be decelerated not accelerated as proposed.</p> <p>Question why Government or the Mayor of London dictate that we have to change. However, we have to be pragmatic; otherwise change will be forced upon us.</p> <p>Questionnaire Response.</p>	<p>right solutions in parallel to the delivery of new housing, employment and retail developments.</p> <p>Officers have some sympathy with the suggestions that the government's calculations for future housing artificially inflate the scale of demand.</p> <p>Our response to the government's "Planning for the right homes in the right places" consultation included robust comments on the shortcomings of their proposed changes to our national planning system.</p>
IO21	Ewell Downs Residents Association	<p>"Objectively assessed housing need" completely ignores factors which can be deemed far more important, e.g. the comparative density of population, housing density and Green Belt in the eleven Surrey boroughs. Epsom is being requested by the Government to build disproportionately more new homes than any of the other eleven boroughs.</p> <p>The Government's proposed standard methodology is overly simplistic and does not take into account many other multiple factors that are very relevant.</p>	<p>Noted. National planning policy requires local planning authorities to prepare local plans on a foundation of evidence. One of the key pieces of evidence of our Issues & Options Consultation is the SHMA. National planning policy requires us to prepare our SHMA in a very specific way. If we failed to do this we would run the high risk of our Local Plan being found unsound.</p> <p>Officers have some sympathy with the suggestions that the government's calculations for future housing artificially inflate the scale of demand. Our response to the government's "Planning for the right homes in the right places" consultation included</p>

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			robust comments on the shortcomings of their proposed changes to our national planning system.
IO22	Mr Garrett Doran	<p>Questionnaire is binary and does not come across as genuine engagement.</p> <p>In relation to Option 3, question how much is meant by ‘significant’.</p> <p>The business case for Cross Rail 2 does not really work without significant development in the area. This would contribute to the project through some form of Land Value Capture.</p> <p>Option 1 seems binary and does not take into account the best practice in urban intensification. There are plenty of examples where urban developments have improved bio-diversity through the use of brown and green roofs, bird boxes and green corridors. The option simply brings to mind the high density developments that blight much of South London and not what is possible with good design. Indeed the density of Notting Hill and Maida Vale is far higher than most areas and is regarded as ‘good density’.</p> <p>All options do not seem to provide a vision for the Borough and come across more as a way to accommodate how the required new builds are to be accommodated. This is a significant opportunity for Epsom & Ewell in undertaking this process and shaping the Borough for the future, including the promotion of health and wellbeing and encouraging people out of their cars.</p> <p>There are some excellent examples in the market of alternative delivery methodologies and land assembly options which can de-risk the delivery of the Council’s policy objectives.</p> <p>Developers, including traditional mass house builders, now recognise that if they are to win sites and gain appropriate planning consents they need to change their approach in view of Local Authorities demands that they deliver social value and genuine place making.</p>	<p>The consultation was publicised by various methods before and during the consultation period, including the proactive engagement with local community groups. Officers were able to engage with a significant number of residents through local public meetings and the number of responses received was one of the highest the Council had achieved when preparing planning documents.</p> <p>The Council is committed to continued working with TfL, Network Rail, the GLA and neighbouring authorities affected by Cross Rail 2 proposals to assist in its delivery.</p> <p>Notes the concern raised in relation to the options and the questionnaire. The Council worked hard to produce an issues & options consultant paper and questionnaire that responded to the difficult and complex challenges facing the Local Plan update that be easy for residents to engage with</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
IO23	Anon	Administration comment	Noted.
IO24	Gladman Developments Ltd	<p>Commentary in relation to the generic requirements of Duty to Co-operation and Sustainable Appraisals.</p> <p>The OAHN figure derived from the SHMA should be subject to a minimum 20% uplift on the baseline to begin to address issues with regard to affordability, the Councils poor record on delivering new homes and the potential suppression of households to take account of market signals. The need for an uplift is reflected in the Government's draft standard methodology figure of 579 homes per annum.</p> <p>Agree that a review of the Green Belt will be necessary to understand whether the full OAN can be met in the plan period without needing the help of neighbouring authorities. If the full housing needs for the Borough are not met the plan will not be found sound at examination.</p>	<p>Noted.</p> <p>For clarity, Epsom & Ewell has a strong record of delivery new homes and has exceeded its current housing target of 181 homes per annum. Indeed, Epsom & Ewell has delivered the highest increase in new homes in Surrey.</p>
IO25	Greater London Authority	<p>London has a need for approximately 66,000 additional homes a year. The evidence (the SHLAA) suggest capacity of around 65,000 additional homes a year. Delivering this will require all London boroughs including neighbouring Kingston and Sutton, to significantly increase provision and make the best use of all available land.</p> <p>Concerned that Epsom & Ewell has only identified supply for less than half of its need figure, and the majority of the consultation draft only addresses the principle of different options to meet demand. Understand that this review is at an early stage of development and suggest that the Council may wish to explore further all supply options.</p> <p>Important to consider how the development capacity benefits of Cross Rail 2 could be captured.</p>	<p>Noted.</p> <p>The Council is committed to leaving 'no stone' unturned in seeking to positively respond to the Objectively Assessed Housing Need figure'. Welcome engagement with Greater London Authority but similarly raises concern that this stage the London Plan has not identified a sufficient supply of housing land to meet its own objectively assessed housing need.</p> <p>The Council is committed to continued working with TfL, Network Rail, the GLA and neighbouring authorities</p>

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			affected by Cross Rail 2 proposals to assist in its delivery.
IO26	HHGL Ltd (Trades as Bunnings & Homebase)	<p>Remain fully committed to the Ewell Homebase store and is in negotiation with the landlord to secure a new long term lease extension on the store.</p> <p>Looking to include this store within its current investment programme and brand launch. This investment will secure new employment as those Homebase stores already converted to the Bunnings brand have seen, on average, a 50% increase in staff numbers.</p> <p>Option 4 should recognise and include:</p> <ul style="list-style-type: none"> -the important contribution that Homebase makes to the comparison offer Epsom & Ewell and its complementary role to the Town Centre. -the lack of alternative sites for retailing of this nature within the Borough. -importance of Homebase as a source of a large number of local jobs, a value that will be enhanced through the planned investment and conversion to a Bunnings Warehouse, and the need to protect these jobs and its retail role. -contribution Bunnings will make to the local community once the store is converted to a Bunnings Warehouse. <p>Questionnaire response</p>	Noted.
IO27	Coldunell Ltd c/o Icen	<p>Support the first principle steps the Council has made in the production of its emerging Local Plan</p> <p>Support seeking to find a suitable approach in delivering its development need, it is important that the Local Plan includes and clarifies the strategic objectives and a vision to achieve these objectives.</p> <p>Epsom & Ewell is a sustainable location. In addition to its own service centres, it contains four train stations all with regular services to London and</p>	<p>Noted.</p> <p>The Council will consider the site through the local plan preparations.</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
		<p>surrounding conurbations. The A24 provides a key spine through the centre of the Borough and follows the railway line as a key corridor for growth.</p> <p>Local Plan must be both aspirational and viable. It should prioritise the co-location of strategic housing and economic growth along these key corridors, where existing infrastructure is its strongest.</p> <p>The opposition to the DCLG is noted. However, need to ensure that its evidence base is updated to reflect the most up-to-date data available, so the assessment of housing need aligning with national policy including a potential standardised methodology.</p> <p>Support the recognition that the constraints to growth faced within the Borough is not unique to its own borders, and in fact is shared by neighbouring authorities within the Housing Market Area. The Council will need to take all reasonable steps in addressing its Objectively Assessed Need within its own boundary.</p> <p>The central objective of the Local Plan should be to deliver the growth of the Borough over the period in a sustainable and coordinated way. The Council will need to assess how to best utilise brownfield sites in the Borough. However, this alone will not meet the objectively assessed housing need of Epsom & Ewell. In compliance with the NPPF, the Council should be positively preparing a plan that identifies sites to fully meet its immediate and long-term housing need, and potentially that of neighbouring areas in the most sustainable locations. This will require some Green Belt release.</p> <p>In light of the current land supply position, the Local Plan considers both maximising the potential yield of development sites, as well as taking a pragmatic approach to the Green Belt through strategic releases for residential housing.</p> <p>Promote Land at Priest Hill for housing.</p> <p>Questionnaire response</p>	

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IO28	Ms Jean Corr	Questionnaire response	N/A
IO29	Jockey Club Racecourses and Jockey Club Estates c/o Rapleys	<p>Note the housing land supply position. The overarching principles are to make effective use of brownfield land, to make use of underused land, and to optimising density of development.</p> <p>Epsom’s horseracing industry, including racehorse training establishments, is located in the Green Belt and these sites are “previously developed sites.”</p> <p>Request that any of the options taken forward includes clear planning policy, together with appropriate land use allocations/designations, which specifically protect these establishments from residential development. The protection of the existing training yards and support for redevelopment for uses which directly relate to, or support, the racing industry is critical to securing the long term future for the racehorse training industry.</p> <p>Considers that the provision of key infrastructure for the training industry is required. This includes the provision of low-cost housing for stable staff working for training stable yards and veterinary practices. The high cost of housing in Epsom for stable staff and the lack of land available for such development have contributed to the decline in the racehorse training industry. As such, the provision of low-cost housing (to be provided at below market rent) is required to meet the needs of the industry.</p>	<p>Noted.</p> <p>Welcome on –going engagement with Jockey Club Racecourse and Jockey Club Estate on this matter including the provision of evidence to support the need for such strategic safeguarding policies.</p>
IO30	Mr John Sharman	<p>Government investment in public transport for rail, tram and bus will enable people from outside the Green Belt to both commute around the local area and into central London. Therefore additional housing can be located outside the Green Belt.</p> <p>Questionnaire response void</p>	Noted.
IO31	Ms Julia Kneale	There is not enough emphasis on the infrastructure that will be need to support the increased population.	Noted. Agree that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect

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		<p>Most current developments do not include adequate parking, most households are now two car, if not more.</p> <p>Green spaces should be within walking distance.</p> <p>Will the proposals include decent units for the old? These may encourage people to downsize freeing the much needed family homes and reduce care costs by creating mutually supportive communities. There is nothing to preclude the building of large 3-4 bedroom flats, they are common on the Continent.</p> <p>Our key green spaces must be preserved in trust, such as the Queen Elizabeth II or you will destroy the special nature of this Borough. Building on the Green Belt must be a choice of last resort.</p>	<p>we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>
IO32	Mole Valley DC	<p>Supportive of the variety of options being undertaken by Epsom and Ewell Borough Council (EEBC) to address the Borough's development needs. However, at this time Mole Valley District Council (MVDC) is not in a position to comment on which option would be the most appropriate for EEBC.</p> <p>Asks that when considering the allocation of strategic sites the cross boundary impact upon green infrastructure transport networks education and health care facilities are taken into account.</p> <p>The overall cross-boundary strategic impact of the Green Belt should be considered when considering the Broad Areas of Search for Options 2-4. Some of the indicative areas of search identified are adjacent to the boundary shared with MVDC. As such, if these areas are brought forward welcome further duty to co-operate discussions in order to ensure consistency when assessing the Green Belt between Ashtead and Epsom.</p> <p>MVDC intends to explore the possibility of meeting a proportion of objectively assessed housing needs outside the District. EEBC's recognition of the importance of cross-boundary working during the plan-preparation process is therefore welcomed. MVDC remains committed to ongoing discussions about the scope for cross-boundary cooperation.</p>	<p>Noted.</p> <p>Welcome commitment to on- going discussions and co-operation.</p>

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IO33	Mr Bloom	Questionnaire response	N/A
IO34	Mrs Dennis	<p>Green Belt should be preserved at all costs as it provides oxygen for a huge urban area within the M25.</p> <p>It seems the only way forward is to build the minimum possible in an already very stretched area. Especially taking into account services and overcrowded rail transport servicing London.</p> <p>The north-south divide is going to get bigger and should be addressed with fast rail services between cities such as Liverpool, Manchester, Sheffield, Leeds, Newcastle and Birmingham with London and each other.</p> <p>There is masses of space away from our congested south east and cramming more into an already congested area is not the answer. Burgh Heath Road is a good example, the housing development on the old stables opposite South Hatch is going to cause even more traffic on a road that has no pavement above it towards the Golf Course. It takes one third of the traffic coming over the downs and it is quite difficult to cross a lot of the time near the Treadwell Junction.</p> <p>The only development in Epsom should be council housing to help those who will never get, or aspire, to buy.</p> <p>Suggest the Elizabeth Welchman Gardens in Downs Road there is only one entrance and very secluded from the road. There are plenty of beautiful walks locally and there is a large user friendly park nearby opposite the University of Creative Arts.</p>	<p>Noted.</p> <p>the Borough Council will consider the site through the local plan preparations.</p> <p>While the government has indicated that they are considering some measures to redistribute, the high regional demand for homes they stop short of a “national plan” to address the national housing crisis. The regional/ structure planning mechanisms that would enable the redistribution of housing growth across Surrey were removed by the coalition government. The government are not currently proposing to reintroduce those mechanisms.</p> <p>Agree that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>
IO35	Mrs L Ketley	Nonsuch Park is a highly valued and used park that should be protected.	Noted.
IO36	National Custom and Self Build Association	Understand that Epsom & Ewell Council are under pressure with regards to housing targets and a limited availability of appropriate developable land. As	Noted.

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		<p>such it is likely that the council may wish to deliver high volume and high density housing where possible.</p> <p>The Local Plan should plan to meet the needs of those that wish to build their own home as set out in the NPPF and as detailed in the Right to Build.</p> <p>Recommend:</p> <ol style="list-style-type: none"> 1. Custom- and self-build demand should be properly assessed if possible. 2. The Local Plan should consider allocating sites specifically for serviced self-build and custom-build plots to ensure that some self-build opportunities are provided in the district within the plan period and to help meet the requirement to offer opportunities to those signed up to the self-build register. 3. Policies that support self-build should be included within the updated Local Plan. 4. A requirement for large developments to include the provision of a percentage of self-build plots (perhaps 5%) should be considered for inclusion in the plan to ensure a small but steady stream of self-build plots. 	<p>The Council has a self -build register. To date there have been very limited interest, this is in itself a market signal of the level of demand.</p> <p>Furthermore, the Borough Council is a Community Infrastructure Levy (CIL) collecting authority and the intelligence collected as part of CIL in relation to self builds evidences that opportunities for such developments/ projects are present.</p>
IO37	Mr Neil Bevan, Chair of Cuddington RA	<p>Shadbolt Park and Auriol Park are “fields in trust” (legal protection) and should remain as is.</p> <p>As owned by Surrey County Council it is up to them to develop the stables at Grafton Road.</p>	<p>Noted.</p> <p>Surrey County Council as a landowner has been approached to promote sites for development.</p>
IO38	Nonsuch Watch	<p>Happy for Nonsuch Park to be designed as Green Belt as long as this does not reduce the protection given by its status as Strategic Open Space (designated in 1993) and SNCI Grade 2.</p> <p>Previous development ideas for the outer Nonsuch lands have caused great concern.</p>	Noted.

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		Green Belt land, in some cases, is being lost to development, and clearly that will happen again.	
IO39	Ms Pat Grace	Concerned for a number of years about the lack of affordable housing in Epsom and Ewell. Urgently request is that this is given top priority when planning for the next 15 years.	Noted. The Council is committed to the delivery of affordable homes.
IO40	Mr Paul Cannon	Hook Road Arena is one of the most used areas of open space and should be excluded from any consideration of areas to be developed. In comparison, Epsom Common is much less used and a portion of it could be developed without upsetting anyone.	Noted.
IO41	Donnington Homes C/o Pegasus Group	Option 1- would not provide enough housing and the LPA would not be able to demonstrate a 5 year housing land supply. Considered that tall buildings should only be permitted in town centres and adjoining transport hubs, such as train stations, where they are appropriate and not out of keeping with the character of the area. Options 1 & 4 would not provide enough developable land to meet housing need beyond this plan period, which would result in the need for more Green Belt release in the future. Support Option 3 as it could deliver the Objectively Assessed Housing Need in full and would guarantee the identification of a 5-year supply of developable land Need to allocate a significant number of new sites to address own OAHN, and would need to allocate even more land if it is to also accommodate the overspill housing need from London, as will likely be requested. Nonsuch Park should be added to the Green Belt as its designation is currently unclear, it would also offset the necessary release of Green Belt land for housing.	Noted. Option 3 would be unlikely guarantee a 5 year housing land supply position (as by the Sedgefield method). It would be extremely unlikely that sites requiring a change to spatial strategy to enable them to be suitable for residential development would be delivering within the first 5 years of the plan. The Council will consider the site through the local plan preparations

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		Promotes land to the West of Burgh Heath Road for housing. Questionnaire response	
IO42	Mr Peter Aldred	Object to building on Shadbolt Park and Nonsuch Park, these were left by the original owners for the general public to be used for leisure and recreation as habitat for wild life. The Council must respect this.	Noted.
IO43	R Trompetto	<p>The requirement to increase the numbers of houses built in our environment to accommodate 20-30 thousand more people over the next 20 years are completely unsustainable and will lead to a deterioration in the quality of life for all our residents.</p> <p>Already the infrastructure is suffering and the congestion in our roads will lead to a complete standstill.</p> <p>Opposed to encroachment on the Green Belt from the strain from requiring for building land. The Green Belt should remain the first priority for Surrey.</p> <p>If housing has to be provided, all brownfield sites must be utilised first, and be affordable for local people, and the infrastructure roads, transport, schools, health facilities be available before the population is increased.</p> <p>Number crunching and directives from central government are all very commendable, but Surrey is already too congested and any further moves to accelerate population growth should be resisted.</p>	<p>Noted.</p> <p>Agree that future infrastructure capacity and funding is a critical consideration in securing sustainable growth for the Borough. In that respect we are committed exploring a securing the right solutions in parallel to the delivery of new housing, employment and retail developments.</p>
IO44	Ms Rachel Buwalda	<p>The derelict Worcester Park Tavern site should be considered for development as should be the site by the Hollywood Bowl at Tolworth.</p> <p>Object to the consideration of Shadbolt Park and Nonsuch Park for development. These serve the local community well as provide desperately needed green space in an already urban area.</p>	<p>Noted. These sites are outside of Epsom & Ewell's administrative boundary.</p> <p>Noted.</p>

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IO45	Ms Rachel Langton	<p>Upset to hearing part Shadbolt Park and even Nonsuch Park may have land taken away for housing as it is needed and used.</p> <p>If development goes head it should be cleaned up and made nicer with a nice picnic area for kids.</p>	Noted.
IO46	Royal Borough of Kingston	<p>Support the references made to the Duty to Co-operate with neighbouring boroughs regarding how we might work together to accommodate new housing; and the recognition that there may be a need to accommodate neighbouring boroughs' unmet need.</p> <p>At this stage, it is unlikely that Kingston will also be able to meet any of Epsom & Ewell's unmet housing need.</p> <p>Under the Duty to Cooperate, the Royal Borough of Kingston looks forward to further discussions with Epsom & Ewell on this subject matter, including with the other housing market area partners.</p> <p>Depending on the scale and the location of development, there is concern about the impact of such development areas on its existing infrastructure, including transport and social/community infrastructure provision.</p> <p>Should these locations be close to the Borough boundary, there will undoubtedly be impacts on infrastructure in neighbouring boroughs.</p> <p>Need to work together to ensure that these impacts of any growth and development are mitigated by adequate infrastructure provision through S106 and CIL receipts.</p>	Welcome on going engagement and co-operation on the matters raised.

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IO47	Runnymede District Council	<p>Concerned that Epsom and Ewell should aim to meet its full OAN, whichever of the identified options it determines on pursuing. Not to do so could call into question the soundness of the emerging Plan, notwithstanding that there may have been some joint working with other authorities in pursuit of the Duty to Co-operate.</p> <p>Runnymede is not yet in a position to be able to confirm that it is able to meet its own housing needs in its emerging Local Plan, 'Runnymede 2035', and may continue to request assistance concerning this matter from Epsom and Ewell (as it does from other Local Planning Authority areas).</p>	Noted.
IO48	Ms Sandra Fernandes	Object to building homes on Nonsuch Park which is both beauty and historically important and is used for exercise daily.	Noted.
IO49	Ms Sarah Clayton	Questionnaire response	N/A
IO50	Ms Sarah Sear	No to the loss of the Green Belt. Any new housing should be affordable and not stockbroker belt housing.	<p>Noted.</p> <p>Our evidence demonstrates that 60% of all housing need is for affordable housing – with the majority being comprised of social rented accommodation. Our existing policy approach has been to respond to this and secure as much affordable provision as possible within the constraints of development viability</p>
IO51	SCoRA	A balance should be found between the various options that have been put forward.	<p>Noted.</p> <p>The housing need figures generated by the Strategic Housing Market Assessment and by the government's proposed standard methodology are</p>

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		<p>The RAs (resident associations) have a long record of careful scrutiny of planning applications and have consistently opposed any proposals which are excessive.</p> <p>The point that new developments tend to weigh heavily on our infrastructure has been well made in other submissions.</p> <p>What extent has infrastructure been taken into account when increasing the demand from 418 new homes to 579 new homes per year.</p> <p>In light of previous flooding events, risk of flooding including from surface water and ground water.</p>	<p>'unbiased' and do not take into account constraints including land designations and infrastructure capacity. These are taken into consideration when generating a housing target (derived from the needs figure) and allocating sites for development.</p>
IO52	Ms Shelagh Miles	Questionnaire Response	N/A
IO53	Sport England	<p>Notes that most of the questions were outside its remit, but highlight the lack of an evidence base and an assessment of needs for sport and recreation to inform the development of the local plan.</p> <p>Sport England considers the 2006 audit and assessment, is now significantly out of date and cannot be relied upon to identify the needs for the area.</p> <p>Strongly recommends that work is undertaken to address the lack of a robust evidence base.</p> <p>Sport England is likely to object to the local plan based on the current position.</p> <p>Questionnaire Response</p>	<p>Noted.</p> <p>The Local Plan evidence base is still evolving. Notwithstanding this, the Council considers that the findings of the audit and assessment are still of some relevance. The Council considers that due to the limited availability of land, previous space standards per population head, as advocated in the 2006 audit and assessment are no longer applicable. However, the focus is on securing qualitative improvements to open space and play pitch provision. This is evidence through the Council's Infrastructure Development Plan (IDP) and Capital Bids Programme. On this basis, the Council is of the view that it is not necessary or proportionate to</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
			<p>undertake a review of the 2006 audit and assessment evidence.</p> <p>Notwithstanding this, if Sports England maintain the view that this work is essential to the delivery of a sound Local Plan update we would welcome funding and support from the organisation to undertake this work.</p>
IO54	Ms Stella Warriner	Protest most strongly against any development on our beautiful parks. In particular Shadbolt Park which is protected under the 'Fields in Trust' scheme.	Noted.
IO55	Surrey County Council	<p>As the Highway Authority we are currently liaising with your officers on transport issues but at this preliminary stage in the local plan process we have no comments to make. When it is clearer as to where the development will be located and its scale, we will be working with you to assess the impacts and to seek any necessary mitigation measures.</p> <p>Our latest education forecasts indicate that a deficit of both primary and secondary school level places is anticipated for the near future across all areas of the Borough. We will therefore need to work with you to ensure that sufficient additional provision is made to support any new development proposed in the local plan.</p> <p>Anticipate that the accommodation and care needs of older people will be considered as the plan is taken forward, particularly in the wider place shaping context. The option to meet housing need by providing high rise development in urban areas has potential access implications for older people that would need to be resolved through policies to appropriately influence design of buildings and the surrounding environment to ensure that the access needs of all sectors of the community are met. Meanwhile, our</p>	<p>Noted.</p> <p>Welcome on going engagement, collaborative working and co-operation through the local plan preparations.</p>

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		officers would like to engage with you to discuss the local care market and adult social care priorities along with our current initiatives.	
IO56	Surrey Police	<p>The local plan should include sound planning policy to reduce opportunities for crime and reduce the perception of crime. The local plan should also ensure there is an effective mechanism to provide new emergency services infrastructure to the meet the needs of the increasing population of Epsom & Ewell.</p> <p>Based on the SHMA demand figure of 418 homes per year across the next plan period 17 this would result in an additional 143 incidents each year. Over the plan period this would require 26 additional police officers in various roles and 15 new support staff to maintain the existing level of response and support.</p> <p>Police forces nationally, are not in a position to support major development of the scale now being proposed for many of the nation's town and cities without the support from the planning system.</p> <p>Sussex & Surrey Police have been actively seeking developer contributions for essential policing infrastructure via the Community Infrastructure Levy and Section 106 developer contributions from all Surrey local authorities.</p> <p>Propose specific policies in relation to:</p> <ul style="list-style-type: none"> -secure by design -evening and night time economy -access for emergency vehicles 	<p>Noted.</p> <p>The Council consider that the proposed policies are sufficiently covered by existing Development Management Plan Policies (adopted 2015), these are supported by the Revised Sustainable Design SPD (2016) and the forthcoming Design SPD. Duplication of these policies in the Local Plan update is unnecessary.</p>
IO57	Ms Susan Brown	<p>Appreciate the need for housing in the Borough but consideration needs also to be given to the need for green spaces that promote wellbeing both physically and mentally. Shadbolt Park is highly valued.</p> <p>There must be other brownfield sites in the Borough or sites that will have far less detrimental impact on the local area.</p>	<p>Noted.</p> <p>The Council has been proactively seeking to identify new brownfield sites. To date it has been unable to</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
			identify enough to meet the identified housing need.
IO58	T Judkins	Opposed to development on Shadbolt Park as it is an area of natural beauty and wildlife.	Noted.
IO59	Transport for London	<p>Does not wish to comment on the alternative options for accommodating housing growth, but in making decisions on which option(s) to take forward, consideration should be given to access to public transport, the capacity of the public transport and highway networks and the opportunities from transport investment.</p> <p>Cross Rail 2 will serve Stoneleigh, Ewell West and Epsom rail stations and will provide additional public transport capacity to support housing growth in that rail corridor, particularly within the catchment of stations that will benefit from improved services. TfL has also been working with Kingston Council in developing improvements to the A3 Kingston bypass at Tolworth and Hook Road roundabouts. TfL modelling has shown that these junction improvements will be necessary to support planned development in the surrounding area.</p>	<p>Noted.</p> <p>The Council is committed to continued working with TfL, Network Rail, the GLA and neighbouring authorities affected by Cross Rail 2 proposals to assist in its delivery.</p>
IO60	Thames Water Utilities Ltd C/o Savills	<p>Do not have comments to make regarding the options for development put forward in the questionnaire.</p> <p>The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.</p> <p>For all new development it will be critical that development is aligned with the water and wastewater infrastructure required to support it.</p> <p>Considers that the Local Plan should incorporate policies in relation to water efficient and ensuring adequate water and wastewater infrastructure. Proposed wording for new policy and supported text provided.</p>	<p>Noted.</p> <p>Welcome Thames Water Utilities Ltd’s engagement and notes the proposed policies that relate to individual sites when seeking planning permission. The Council consider that the proposed policies are sufficiently covered by existing Development Management Plan Policies (adopted 2015) these are supported by the Revised Sustainable Design SPD (2016). Duplication of</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
		Highlight the role of planning conditions requiring further information or the phasing of development could then be used to ensure that development is delivered alongside any water and wastewater infrastructure required to support it.	these policies in the Local Plan updated is unnecessary. As the strategy develops, the Council will seek further engagement to identify any capacity constraints and requirements for infrastructure investment to support the level of housing growth expected to be delivered over the next plan period.
IO61	Ms Tracy Reeman	Nonsuch Park should not be lost as it has so much history and has high user- ship.	Noted.
IO62	University of Creative Arts C/o Porta Planning	UCA would like the Local Plan Review to include specific reference to higher education and, in particular, UCA as well as student housing. Request a site allocation policy for University for the Creative Art to support the valuable uses at the campus and a specific policy in relation to student accommodation.	Noted. The Council is of the view that the current Development Management policies DM24 (employment uses outside of existing employment policy areas) and DM21 (Meeting local housing needs) are sufficient and provide the necessary safeguarding and flexibility. Especially given the level of student accommodation delivered to date and the modest level of demand for specialist accommodation (which includes student accommodates) identified within the SHMA 2016 in comparison to that of market and affordable homes.
IO63	Waverley Borough Council	Do not wish to comment on the proposed options for meeting your objectively assessed housing needs within your borough.	Noted.

Ref	Name/ Organisation	Summary of Response	Officer Comments
		<p>However, if indications are that you will not be able to accommodate all of the identified housing need within your borough, then, as you know, you will need an evidence base to demonstrate clearly that all possible options for meeting this need have been fully explored and that you are in active discussions with other authorities within the Housing Market Area to examine how any unmet need could be accommodated elsewhere within the HMA.</p>	<p>The Council can confirm that they are proactively working with its Housing Market Area (HMA) partners to address this HMA wide issue.</p>
IO64	Ms Wendy Dennis	<p>The enclosed park on Downs Road, Epsom would be a good site for a block of flats.</p> <p>This is a very leafy part of the Borough and there are very pleasant walks around the local roads for dog owners and the public.</p> <p>Houses in this area on the whole also have very generous gardens. Question whether many Epsom residents make, if ever, a visit to this park having the large open park behind the Ashley centre and other more open spaces to enjoy.</p> <p>With regards to access and extra traffic it is a quieter road than Burgh Heath Road where at present a large housing development is being built, opening on to a very busy road from the Downs.</p>	<p>Noted.</p> <p>The Council will consider the site through the local plan preparations.</p>
IO65	Atkins Properties Ltd c/o Savills	<p>Consider that the Government's proposed standard methodology needs figure of 579 units is a more accurate reflection of the Borough's need.</p> <p>Outlined a number of limitations of the Green Belt Study methodology and conclusions.</p> <p>Option 1 is unrealistic and that it will be inevitably address housing needs through green belt release.</p> <p>The most sensible option would be to fully reassess the Green Belt and maximise the use of appropriately located green belt sites that can be delivered quickly with minimal impact on the purposes of the Green Belt. Employment and green space in the Borough's settlements can then be</p>	<p>Noted.</p> <p>The Green Belt Study (GBS) 2017 was undertaken by an independent consultant and the Council maintains that this was produced in accordance with the NPPF and national Planning Policy Guidance. It should be noted that a stage 2 to the GBS is currently being undertaken to provide a more detailed assessment. On this basis and in light of the evolving evidence base, the limitations outlined in the</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
		<p>retained and importantly the character of the Borough will not be adversely effected.</p> <p>By committing to Option 3 the Council would be able to meet the real housing needs of the Borough and provide adequate infrastructure to support the growth and maintain the character of the area into the future.</p> <p>Promote the Land East of Downs Road for housing development.</p>	<p>representation received appear premature.</p> <p>The Council will consider the site through the local plan preparations.</p>
IO66	Mr Colin Thomas	<p>New homes must be suitably priced, either for purchase or rent to accommodate local people, particularly those working in the public sector (fire, police, ambulance, NHS) and commerce people not speculators who buy and rent at exorbitant rates.</p> <p>New homes must have sufficient parking facilities with a contractual residential parking scheme.</p>	Noted.
IO67	Mr Roger Runson	<p>The housing need figures are unacceptable. However, we must be pragmatic.</p> <p>Questionnaire Response</p>	<p>Noted. National planning policy requires local planning authorities to prepare local plans on a foundation of evidence. One of the key pieces of evidence of our Issues & Options Consultation is the SHMA. National planning policy requires us to prepare our SHMA in a very specific way. If we failed to do this we would run the high risk of our Local Plan being found unsound.</p> <p>Officers have some sympathy with the suggestions that the government's calculations for future housing artificially inflate the scale of demand. Our response to the government's "Planning for the right homes in the</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
			right places” consultation included robust comments on the shortcomings of their proposed changes to our national planning system.
IO68	Church Commissioners for England C/o Lichfields	<p>Have identified a number of fundamental flaws with the SHMA 2016 and cannot be relied upon for the purposes of assessing housing needs in Epsom & Ewell.</p> <p>Evidence base (SHLAA 2017) shows there is an acute need for new housing and sites.</p> <p>To preserve the character of Epsom & Ewell, while meeting the ‘exceptional’ housing need, the new Local Plan should proactively review and consider the role and functionality of its Green Belt and identify areas suitable for new homes.</p> <p>This should be undertaken in parallel with a review of the urban areas within the Borough, aimed at identifying opportunities for the densification of sustainably located sites. By opting for this combined approach, this would increase the potential to achieve the identified housing need while also utilising underperforming urban and Green Belt sites.</p> <p>Strongly encourage adoption of a strategy which incorporates elements of both Options 3 and 4. The adopted strategy should look to a brownfield land first approach, but with Green Belt land identified for release for new homes to meet the outstanding housing need in full.</p> <p>Supportive of overriding intention to protect the integrity of the Green Belt for its intended purpose, but supports the undertaking of a review to identify where Green Belt land may not contribute positively to each purpose of the Green Belt.</p> <p>When reviewing boundaries, should take account of the need to promote sustainable patterns of development.</p>	<p>The Council maintains that the SHMA 2016 was produced in accordance with the NPPF and national Planning Policy Guidance. This is a view shared by the HMA partners. The Council is of a view that the “critique” by Lichfields [not fully submitted directly as part of this consultation but produced in support of a S78 appeal inquiry for a predatory application in the Green Belt within Elmbridge (within the HMA) can be robustly rebutted by the consultants who undertook the assessment.</p> <p>It should be noted that the proposed ‘Lichfield methodology’ has its self been superseded by the proposed standard methodology.</p> <p>The Council will consider the site through the local plan preparations.</p>

Ref	Name/ Organisation	Summary of Response	Officer Comments
		<p>Releasing land within the broad search areas for development, will ensure that the remaining Green Belt land will safeguard the countryside from unnecessary encroachment. The locations suggested are most likely to be the most sustainable locations in the Borough and will result in the least impact on the Green Belt and environment.</p> <p>Promotes Land at Horton Farm for housing.</p>	

Appendix 4- Consultation List

Type of Consultee	Number sent	Number undelivered	Requested to be added to the database during consultation
Individuals	518	23	70
Agents	201	25	3
Local organisations and groups	35	1	4
Statutory Consultee and Infrastructure	40	8	1
Politicians and Political groups	36	2	0
Prescribed Bodies / organisations	20	2	1
Local Planning Authorities	19	3	4
Education	28	0	0
Faith Groups	12	2	0
Developers	31	4	1
Housing Registered Providers	16	2	0
Site Owners	16	1	0
Total	972	73	84

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