

**Epsom & Ewell Borough Council
Draft Revised Sustainable Design Supplementary Planning Document
Consultation Responses, Officer Comments and Suggested Actions
January 2016**

Consultee Details	Response	Officer Comments	Suggested Actions
Gatwick Airport Ltd – Amanda Purdye	<p>In the revised Sustainable Design Supplementary Planning document, on page 34 under Para 7.2 (D) and on page 40 under Para 7.23 (D), it mentions wind turbines as an example of renewable energies that could be considered.</p> <p>On page 44 under Paras 7.45 & 7.46 it mentions wind turbines specifically and the effects they can have on the surrounding environment. Please note that the Epsom & Ewell area is within the 30km wind turbine consultation zone, therefore it is important that consultation with the airport takes place should any ‘non domestic’ wind turbines be proposed. This is to enable us to be able to determine any potential impacts on aviation interests.</p> <p>For further information please see Advice Note 7 ‘Wind Turbines & Aviation’ attached. Also available at www.aoa.org.uk/operations-safety/</p>	Comments noted. The Council will ensure the airport is consulted when appropriate.	<p>Ensure the Development Management team is informed of consultation requirements.</p> <p>Consider adding footnote to Paras 7.45 and 7.46 to make reference to the 30km wind turbine consultation zone and that further information can be found at the associated web address.</p>
Epsom Civic Society – Mr Malcom Boyd	<p><i>Are you satisfied that we achieved our objectives in revising this document?</i></p> <p>We are satisfied that the objective has been achieved. We agree that all relevant policies have been included and the text makes clear and consistent reference to them.</p> <p><i>Do you have any general comments on the Document?</i></p> <p>In Figure 1, if the body of the pyramid encompasses the</p>	<p>Comments noted.</p> <p>Comment noted and agreed.</p>	<p>Amend diagram to show inverted pyramid.</p>

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	<p>quantity of waste, prevention being the most favoured option should be shown as the largest quantity of waste. Similarly, minimisation should refer to the next largest quantity of waste. It follows that the pyramid should be inverted so that the smallest quantity of waste is left after the sequence of disposal options.</p>		
<p>Environment Agency – Mr Charles Muriithi</p>	<p><i>Are you satisfied that we achieved our objectives in revising this document?</i></p> <p>The revisions to the introduction section appear to be reasonable; this section looks well set out and offers links between the planning policies and local documents.</p> <p>It is helpful to have this new chapter included within the document as it starts to offer guidance on what the requirements are for different types of development in order to demonstrate that a development is sustainable. This chapter sets out the ‘what’ is required, but not a lot of guidance on the ‘how’. Has consideration been given to possibly signposting to other documents where further information could be found to assist applicants in the process?</p> <p>Sustainable Drainage Systems As a general observation, the section of the document related to Sustainable Drainage and Flood Risk is well set out, contains helpful information with the case studies and links/signposts to other documents are very helpful. The matrix on paragraph 2.8 would be enhanced by including links and sources of useful information column to assist</p>	<p>Comments noted. The introduction is intended to set out clearly ‘what’ is required, while the main body of the document provides the ‘how’ this is to be achieved. There are numerous links to other documents / websites where further information can be found.</p> <p>Table 2.8 is intended to provide an overview as to what is required by an applicant, while the main body of the document provides the detail.</p>	<p>None</p> <p>None</p>

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	<p>applicants. This would for instance include links to borough SFRA and Surrey County council links. We appreciate that Chapter 6 Managing Water provides comprehensive coverage of water resources topics.</p> <p>Based on the borough Surface Water Management Plan, the Strategic Flood Risk assessment and the Hogsmill Integrated Urban Drainage Pilot Study a significant number of properties in the Borough may be susceptible to surface water flooding as a consequence of:</p> <ul style="list-style-type: none"> • The inability of the sewer network to safely remove intense rainfall • Surface run-off from the chalk in the south of the Borough on to the clay in the north • Groundwater flooding from the chalk following prolonged above average rainfall. <p>The Government has strengthened planning policy on the provision of sustainable drainage for ‘major’ planning applications. Decisions about the suitability of sustainable drainage provision are made by the Lead Local Flood Authority (LLFA). Surrey County Council as the LLFA has full responsibility for managing flood risk from surface water, groundwater and ordinary watercourses. Under the Flood Risk Regulations 2009 LLFAs are also responsible for assessing, mapping and planning for local flood risk, and any interaction these have with drainage systems and other sources of flooding, including from sewers. Water companies will work with LLFAs to help manage surface</p>	<p>Noted. The Lead Local Flood Authority (Surrey County Council) is identified in table 2.8 and in the relevant SuDS section.</p>	<p>None</p>
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	<p>water flooding.</p> <p>It will be essential that SUDS are properly planned at the onset of planning for new development. Developers and their design teams need to take into account different factors including the layout of the site, topography and geology when planning and positioning the different SUDS elements for the whole scheme. This information will be required for both outline and full applications so it is clearly demonstrated that the SUDS can be accommodated within the development that is proposed. To support the new consultation arrangements, DCLG has changed the Planning Practice Guidance. The main changes are to these pages:</p> <p>Why are sustainable drainage systems important? How the local planning authority should involve the lead local flood authority when determining planning applications and what advice should be given about local flood risks Water supply, wastewater and water quality considerations in plan-making We welcome the inclusion of a Flood Risk Assessment as part of the supporting evidence. It may be worth highlighting the need for some applicants to undertake a sequential test. https://www.gov.uk/guidance/flood-risk-assessment-the-sequential-test-for-applicants</p> <p>We note that the matrix on page 9 section 2.8 mentions water consumption (with water quality and flood risk) but does not detail any requirements in the table to guide how</p>	<p>Noted. A link to the sequential test information will be included in the document.</p> <p>Noted. This requirement is to be assessed through Building Regulations,</p>	<p>Add link to Para 6.12</p> <p>None</p>
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	<p>this could be satisfied. It includes further information on water efficiency and the requirement to meet the tighter standard of 110 litres per person per day but it does not include any requirement for the developer to show how this issue will be considered or addressed.</p> <p><i>Do you have any general comments on the Document?</i></p> <p>Climate Change The flood risk climate change allowances are being revised to reflect the latest climate projections in UKCP09 and wider flood risk research published since 2009. This is due to be published in autumn 2015 and will replace previous climate change allowance. The main change to the allowances will be for peak river flow. Allowances will be provided for each river basin district, similar to those in 'Adapting to climate change: Guidance for flood risk management authorities'. We will update 'Adapting to climate change: Guidance for flood risk management authorities' so the allowances are consistent. Land use planning decisions should be based on the latest and most accurate climate change data and evidence. https://www.gov.uk/government/publications/flood-and-coastal-risk-guidance-climate-change-allowances</p> <p>River Basin Management Plan We would also wish to see the SPD take into account the River Basin Management Plan which provides a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and</p>	<p>rather than through the planning process.</p> <p>Comments noted.</p> <p>Comments noted. It is considered that such 'high level' documents are more appropriate to inform the general</p>	<p>None</p>
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	<p>land resources are closely linked, it also informs decisions on land-use planning.</p> <p>Catchment flood management plans The Catchment flood management plans explain the actions to help manage flood risk across river catchments. https://www.gov.uk/government/collections/catchment-flood-management-plans</p> <p>Catchment data explorer Catchment data explorer holds evidence on the state of the water environment and some of the measures that need to be put in place to improve our rivers and the water environment. http://environment.data.gov.uk/catchment-planning</p> <p>Planning Application consultation Sometimes we are consulted when we don't need to be. Please double check our "When to consult the Environment Agency list" if you are unsure whether you need to consult us. If it is a valid consultation it's important that all information and reports are available for us to view online. For a list of when to consult the Environment Agency click below: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/352379/when-to-consult-environment-agency.pdf</p> <p>Pre-application Charging We encourage early pre application discussions to ensure</p>	<p>location of development at Core Strategy level, rather than in a Sustainable Design SPD.</p> <p>As above.</p> <p>As above.</p> <p>Comments noted.</p>	<p>Ensure the Development Management Team is aware of the consultation arrangements.</p> <p>Consider including the suggest web address, so that readers can understand when to consult the Environment Agency.</p>
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	<p>of the environmental issues that may affect a site. This ranges from how to reduce flood risk through to creating quality green space in a development. We give pointers for building sustainable, cost-effective homes, helping create an environment in which people will really want to live. We've also provided examples of sites where this good practice has already been applied.</p> <p>We have updated our advice for developers and it is now a joint agency document with advice from Environment Agency, Natural England and Forestry Commission, it's available to view on our website: https://www.gov.uk/government/publications/planning-a-guide-for-developers</p> <p>Planning and permitting Planning and permitting decisions are separate but complementary. Planning permission determines if land may be used for a particular development and focuses on land use issues, whereas permitting is about the control of processes and emissions to the environment. Early consideration of permitting issues reduces risk of material changes being needed during DCO process. Parallel tracking provides opportunity to resolve issues and aids faster decision making.</p> <p>We advise developers and planning authorities at the pre-planning application stage to allow early consideration of all the fundamental issues relating to whether a particular development will be acceptable in principle. We encourage developers to contact us as early as possible in the process.</p>		<p>Environment Agency.</p>
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	<p>We are also consulted when applicants request scoping opinions for Environmental Impact Assessments. We've developed guidelines to help Local Planning Authorities, the Planning Inspectorate and developers with planning and permitting issues. The guidelines should help to reduce costs and burdens on developers, operators, planning decision-makers and us by increasing certainty over planning and permitting decisions. For more guidance on this please refer to our guidelines on planning and permitting at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297009/LIT_7260_bba627.pdf</p> <p>Pre application enquiry form We continue to encourage early pre application discussions and request you ask developers and consultants to complete our pre application form and return to our team email address: https://www.gov.uk/government/publications/pre-planning-application-enquiry-form-preliminary-opinion</p> <p>Flood risk standing advice Please continue to use this tool to decide when to consult us, what the consultation should contain, and how to make a decision on lower risk sites. https://www.gov.uk/flood-risk-standing-advice-frsa-for-local-planning-authorities</p> <p>Ensure flood maps and other environmental maps are up to date</p>		
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	<p>Use the link below to register for our environmental data http://www.geostore.com/environment-agency/WebStore?xml=environment-agency/xml/register.xml</p> <p>Our national planning WebPages link: www.gov.uk/environment-agency</p>		
Ms Margaret Hollins	<p><i>Are you satisfied that we achieved our objectives in revising this document?</i></p> <p>Yes, links are clearly made between national and local planning policy, the presumption in favour of sustainable development and relevant planning documents, including the Surrey Climate Change Strategy and Housing Standards Review.</p> <p>In paragraph 1.6 is it worth adding, “and underpinned by law” at the end of the first sentence to strengthen / reinforce the point. (Legal references (possibly as footnotes): S39 Planning and Compulsory Purchase Act 2004 on sustainable development – local planning authorities “must exercise the function with the objective of contributing to sustainable development.” ; and S183 Planning Act 2008 on good design – “ .. must in particular have regard to the desirability of achieving good design; and the Planning and Energy Act 2008 – requirements for energy use and energy efficiency in local plans.)</p> <ul style="list-style-type: none"> • Recommend checking for consistent provision of links / references throughout this section, eg, in paragraph 2.4 	<p>Comments noted.</p> <p>Agreed. Additional text added as suggested.</p> <p>Comments noted.</p>	<p>Add suggested text and footnote to para 1.6.</p> <p>Add relevant link to text.</p>

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	<p>should there be a link to Building Regs?</p> <ul style="list-style-type: none"> • Guidance re the sustainability statement needs to be consistently clear throughout as to whether the requirements relate only to the construction phase and /or throughout the life of the development. Some inconsistency / ambiguity in this respect. • Inconsistency between para 2.4 and 2.8: re paragraph 2.4: “[I]nformation relating to energy is not included in the sustainability statement” - but the matrix (para 2.8, page 8) refers to energy in the context of the sustainability statement. • Energy and water efficient white goods (p11) – should this be expanded to cover water efficiency more generally to ensure compatibility with chapter 6, eg to include recycling of grey water (para 6.31)? <p><i>Do you have any general comments on the Document?</i></p> <ul style="list-style-type: none"> • Suggest inversion of waste pyramid to emphasise importance and priority of actions, colour coding remains the same, as does wording top-bottom (there are several examples available via Google Images, inc one from Scottish Planning/Env website • Section 5 Air Quality, Noise and Light Pollution (pp18 – 20): only as regards ‘light’ is there a reference to S79 Environmental Protection Act 1990, yet S79 (statutory nuisance) can also apply to air quality and to noise. Suggest inclusion of S79 references in the light and noise sections also. • The Energy Saving Trust: correct reference to it on p37, 	<p>Further detail on this is contained within the main body of the document. The table in section 2.8 is intended to be an overview of the requirements.</p> <p>Noted. The reference to energy in 2.8 relates to that used during the construction process, rather than how the development itself performs in energy terms.</p> <p>Comments noted. Greywater recycling is mentioned in the SuDS bullet point.</p> <p>Noted.</p> <p>Comments noted.</p>	<p>Add sentence to clarify requirements.</p> <p>Amend diagram to show inverted pyramid.</p> <p>Add references to relevant sections.</p> <p>Change text to ‘Saving’</p>
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	<p>but plural added on p39, ie 'Savings' – so return to singular.</p> <ul style="list-style-type: none"> • Page 40 bullet points do not all read consistently with 'Air source heat pumps could:' – bullet point 4 needs re-phrasing, eg 'dispense with fuel deliveries' or 'eliminate the need for fuel deliveries'. • Ensure links are provided for all case studies in the interest of consistency. • Generally this is a most useful, timely and comprehensive SPD, drawing on a wide variety of sources to encourage good practice in the delivery of sustainable development and provide clear guidance for developers as to address the challenges of climate change at the local level. 	<p>Noted.</p> <p>Noted.</p> <p>Noted. Links have been added where available.</p> <p>Comments noted.</p>	<p>Amend text to clarify</p>
<p>Thames Water</p>	<p>Thames Water supports the approach to sustainable drainage (SuDS) as set out in the e Planning Practice Guidance. SuDS provide opportunities to reduce the causes and impacts of flooding, remove pollutants and provide amenity, recreation and wildlife benefit. In particular developers should ensure that surface water run-off is managed as close to source as possible and should aim to achieve greenfield run-off rates.</p> <p>Thames Water supports the inclusion of details in relation to SuDS in Section 6 of the revised SPD. However, it is important to note that with regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground or watercourse. It is only</p>	<p>Comments noted.</p> <p>Comments noted. The Council promotes the use of SuDS in all developments where they are an appropriate measure.</p>	

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	<p>when all options have been exhausted and there is no practical reason for using sustainable drainage, that developers should seek connection to the public network. It is important to minimise the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage conveyance and to reduce the risk of sewer flooding.</p> <p>We trust the above comments are helpful. If any clarifications are required on any of our response, please do not hesitate to contact me</p>		
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