

Epsom and Ewell
Local Plan
2022-2040



Proposed Submission Local Plan

Regulation 19

LPPC - 20 November

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Details of the Regulation 19 Representation

- 1.1. This Regulation 19 representation period is the next step in the plan making process. The purpose of the Regulation 19 stage is to provide an opportunity for representations to be made on the proposed submission local plan before it is examined by a Planning Inspector.
- 1.2. Further information, including frequently asked questions, on the Regulation 19 Stage is available on [our website](#). You can also reach the website quickly by scanning the **QR code**.
- 1.3. The council consulted on a Regulation 18 Draft Local Plan (2022-2040) in 2023 that was a detailed Local Plan containing strategic policies (including draft site allocations) and development management policies.
- 1.4. The Regulation 19 consultation stage is different to those undertaken previously:
 - This is the last stage of public engagement before submitting the Draft Plan to the Planning Inspectorate for examination.
 - This is a representation period on the finalised proposed Local Plan policies; earlier consultations sought views which had to be considered before the council finalised this draft Local Plan.
 - All responses received during the consultation period will be sent to the Planning Inspectorate.
 - Only representations on the soundness and legal compliance of the Plan can be made and it must be targeted to a specific policy or paragraph in the Draft Plan. Your representations will need to focus on the following:
 - Whether or not the plan is legally compliant (including Duty to Cooperate).
 - Whether the plan satisfies the tests of soundness by being:
 - Positively prepared – being based on a strategy that aims to meet objectively assessed needs for development and infrastructure.
 - Justified – being an appropriate strategy.
 - Effective – being deliverable over the plan period based on effective joint working.
 - Consistent with national policy – enabling the delivery of sustainable development in accordance with the NPPF.
- 1.5. Representations should be supported by evidence if possible, and when making representations, please clearly indicate which policy, paragraph or page number you are referring to.
- 1.6. In addition to the Local Plan, during the consultation period representations can also be made on changes to the Policies Map, the Sustainability Appraisal and the Equalities Impact Assessment.

1.7. The consultation period starts on the **XX and runs for 6 weeks until XX 2025**. Should you wish to make representations on the legal compliance or soundness of this document you must do so within the six-week period. Please submit your representations using the on-line forms which can be found on the Local Plan pages at **(ADD LINK TO INOVEM)**



Chapter 1 – Introduction

What is the Epsom and Ewell Local Plan?

- 1.8. The Epsom and Ewell Local Plan sets out policies and site allocations to guide the development and use of land in the Borough up until 2040 and provide a strategy for sustainable growth. The Local Plan also sets out how the council will manage the built and natural environment.
- 1.9. Once adopted, the Local Plan and its supporting Policies Map will form part of the Epsom and Ewell Development Plan together with other ‘development plan’ documents such as the Surrey Minerals Development Plan, Surrey Waste Development Plan and any adopted Neighbourhood Plans.
- 1.10. Once adopted, the Epsom and Ewell Local Plan (2022-2040) and supporting Policies Map will supersede the policies contained within the following development plan documents:
 - The Core Strategy 2007
 - Plan E – An Area Action Plan for Epsom Town Centre 2011
 - The Development Management Policies 2015

Why prepare a new Local Plan?

- 1.11. Epsom and Ewell borough is a desirable location to live, study and work. However, many people who work in the area are unable to afford to live in the borough, this can cause problems for the households and difficulties for local employers (including public services) in retaining and recruiting staff.
- 1.12. There is an ageing population in the borough many of whom want to remain in the borough but have difficulty in finding the type of housing that meets their needs. Other changes, for example to how people shop and working practices (such as increased working from home in specific sectors), are leading to changes in supply and demand for certain types of commercial premises in the borough.
- 1.13. The Local Plan seeks to protect our attractive and valued environment whilst reconciling the need to accommodate our development needs. The balance between protecting our environment and enabling development and supporting infrastructure is at the centre of our spatial strategy.
- 1.14. A key reason for reviewing the plan is that is a legal requirement for Local Plans to be reviewed every five years from the date of adoption and having an up to date plan in place reduces the risk of speculative development in the borough.

What is the Local Plan evidence base?

- 1.15. Supporting the Local Plan is a wide range of evidence base, some of which are legal requirements such as the Sustainability Appraisal and a Habitat Regulations Assessment. The Sustainability Appraisal checks that the Local Plan will achieve, social and environmental benefits and that any harm is mitigated by other factors. The Habitats Regulations Assessments considers the impact of the Local Plan on specific nature conservation sites.
- 1.16. Other evidence base documents that have informed the Local Plan and are publicly available on our website include:
- Housing and Economic Development Needs Assessment (2023) (HEDNA)
 - Gypsy and Traveller Accommodation Needs Assessment (2022)
 - Land Availability Assessment (2024) (LAA)
 - Site Assessment (2024)
 - Local Plan Viability Assessment (2023)
 - Strategic Flood Risk Assessment – Level 1 (2024)
 - Strategic Flood Risk Assessment – Level 2 (2024)
 - Infrastructure Delivery Plan (2024)
 - Local Plan Strategic Transport Assessment (2024)
 - Green Belt Study (2024)
 - Epsom Town Centre Masterplan (2024) (ETCMP)

How to use the Local Plan

- 1.17. The Local Plan should be read as a whole. The individual policies and proposals must not be considered in isolation from each other. Often several different policies will be applicable to a single development proposal.
- 1.18. To deliver the vision and objectives, there are a suite of policies and land designations. These are divided into high level policies called 'strategic policies' and 'site allocations', which set the strategy for the Local Plan and provide the high-level principles that development must adhere to. For emerging neighbourhood plans it is important to note that policies in a neighbourhood plan must be in line with the strategic policies within the adopted Local Plan. Specific land designations are detailed on the Policies Map which accompanies the Local Plan.
- 1.19. Then there are the detailed (non-strategic) policies called 'Development Management' policies, which provide the detailed criteria and standards which proposed development will be assessed against. Non-strategic policies in this Local Plan may be superseded by any policies identified in future Neighbourhood Plans.

How will new development be supported?

- 1.20. Implementation and resourcing of the Plan will be critical to its success. It will be important that we continue to work collaboratively with partners across the private, public and voluntary sectors to deliver the Plan.
- 1.21. Improvements to infrastructure will be required to support the development proposed in the Plan and this is set out in an Infrastructure Delivery Plan (IDP).
- 1.22. Infrastructure will be funded through a combination of public funding, developer-led provision and the Community Infrastructure Levy (CIL). The Plan's policies and proposals will also enable us to highlight the infrastructure needs and bid for additional resource funding opportunities that may arise from Government or other funding initiatives.

How will we know if the Local Plan is successful?

- 1.23. We will monitor the progress of the Plan and the performance of each policy through our Authority Monitoring Report which is published annually. A key indicator as to the Plan's success will be whether development and infrastructure is delivered at the rate expected. This will include whether the number of homes built each year and the supply of housing land is keeping up with the targets set in the Plan.
- 1.24. The Plan, in accordance with national planning policy, must be reviewed every five years to ensure that it remains up to date and fit for purpose.
- 1.25. Chapter 9 of this Plan sets out how each of the policies will be monitored.

Key facts about the borough

Population

- 1.26. Epsom and Ewell borough is currently the home for 80,900 people (2021 census). It is the smallest borough in terms of geographical area in Surrey. Whilst it is the smallest in size, the population is relatively high and is also the most dense borough in Surrey. The borough is situated on Surrey's northern border adjacent to London. Its adjoining neighbours include the London Boroughs of Kingston and Sutton, and the Surrey authorities of Mole Valley and Reigate & Banstead.
- 1.27. The population of Epsom and Ewell borough has grown from 75,102 people to 80,900 people between 2011 to 2021. That is an increase of 7.7%. This is higher than the overall growth in Surrey of 6.2%. The population has appeared to increase quicker than the number of households and therefore household sizes have seen an increase. The average size in Surrey is 2.5 persons per household with the highest level found in the borough at an average of 2.58 persons per household.
- 1.28. The fastest growing group is the over 70s in Surrey. This trend is expected to continue in the next plan period, with a projected increase of 38% of those aged 65 years and over between 2022 to 2040 (HEDNA, 2023).

- 1.29. The proportion of households with dependent children is slightly higher than the England average. This suggests that the borough is a relatively attractive place to bring up children (HEDNA, 2023).

Employment

- 1.30. The borough supports a wide range of businesses, with two sizable employment sites that adjoin each other (Kiln Lane Industrial Estate and Longmead Industrial Estate) that predominantly cater for businesses requiring light industrial / manufacturing units and these two sites support over 160 businesses across a range of sectors that provide approximately 1,900 jobs.
- 1.31. The number of people employed in the borough is forecast to increase by over 9,300 jobs over the Local Plan period which will generate a need for additional employment floorspace (HEDNA, 2023).
- 1.32. The borough has a successful racehorse training industry that is concentrated outside the urban area including Epsom Downs Racecourse and its associated training grounds and stable complexes.
- 1.33. The borough is fortunate that the level of unemployment is relatively low. It has among the highest rate of economically active people of working age (92.2% based on NOMIS data from June 2023 – June 2024) in the country. However, the borough does have a skills shortage in some sectors, such as hospitality, and many workers are unable to afford homes close to work. This creates additional pressure to make sure that adequate provision is made for affordable housing.
- 1.34. Epsom Town Centre is the borough's primary retail area. Ewell and Stoneleigh are local centres and all have access to public transport including rail links.
- 1.35. Educational establishments, the University for the Creative Arts and Laines Theatre Arts are located within the borough. Levels of educational attainment in the borough (NVQ4+, degree level and above) for 16-64 years olds are higher than the national average where the proportion of people with no qualifications is lower than the national average.

Deprivation

- 1.36. Average gross weekly pay in the borough in 2022 (£798) was 27% higher than the average for England & Wales (£628), however there are pockets of deprivation including Court Ward which is one of the most deprived wards in Surrey. Epsom is one of the least affordable places to live in Surrey when comparing median household incomes to median property prices. The housing affordability ratio in the borough was 16.8 in 2023. That is, the median house price is 16.8 times the median gross annual workplace-based earnings. Historically, the housing affordability ratio has risen substantially over the last three decades: 5.4 in 1997, 10.2 by 2004 and 14.6 in 2014.

Housing

- 1.37. Housing is an issue of great significance to the borough and forms a major theme of this Local Plan. The council has devoted considerable effort to understanding what the borough's housing needs are through our Housing and Economic Development Needs Assessment (HEDNA).
- 1.38. The council has also identified the land available to meet development needs through our Land Availability Assessment (LAA). These documents form a key part of our evidence base. The LAA has helped us to consider where new homes could be built by assessing the suitability, availability and viability of land to provide additional dwellings or other types of development.

Natural Environment

- 1.39. There are Sites of Special Scientific Interest (SSSI), Local Sites of Nature Conservation Importance and nature reserves in the borough.
- 1.40. The borough is home to a variety of habitats and species particularly in natural/ semi-natural landscapes of Epsom Common and Horton Country Park Nature Reserve. Other valuable green spaces include Hogsmill Park and Nonsuch Park which has historic links to Henry VIII, where his former palace was located.
- 1.41. Some areas of our borough, including Epsom Town Centre, are at risk of fluvial and surface water flooding. Flash flooding can cause severe disruption to people and businesses, closing main roads and damaging homes. More information on flood risk in the borough can be found in our Strategic Flood Risk Assessment (2024) (as amended).

Heritage

- 1.42. Our borough has a particularly rich and varied architectural heritage with 315 nationally listed buildings, over 50 locally listed buildings and 21 conservation areas. It also contains a registered park and garden.
- 1.43. Epsom has a rich history, including the home of the Epsom Downs racecourse and the world-famous Derby. It is also where Epsom salts originated, found naturally from the area's water source.

Infrastructure

- 1.44. Pressure on existing infrastructure and additional stress caused by planned growth must be addressed to maintain and enhance the borough's prosperity and quality of life.
- 1.45. There are 19 primary phase schools in the borough, seven with nursery provision. There are four secondary schools, all of which also have post-16 education provision for academic and some vocational courses. Epsom has a further education college (NESCOT) offering vocational post-16 education with some adult education and part time course provision. The University for the Creative Arts (UCA) and Laine Theatre Arts are also based within the borough offering higher education courses in creative industries.

- 1.46. Education provision for children and young people with special educational needs (SEND) is provided by education providers within and beyond the borough although depending on the SEND provision required, SEND provision may also be accessed in neighbouring boroughs, county wide or out of county.

Transport and Accessibility

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

What are the challenges facing Epsom and Ewell

- 1.49. The most important challenge facing the Local Plan is to deliver growth to meet local needs and to consider any needs that cannot be met in adjoining areas. The aim is to maintain and reinforce our communities' sense of place while, wherever possible, enhancing the borough's character, environment and heritage. More specifically, the Local Plan needs to:
- deliver a sustainable level of housing growth having regard to the borough's constraints, to meet future housing needs;
 - provide a range of housing that meets needs, for example related to size, tenure (including affordable housing) and specialist accommodation;
 - provide space to enable local businesses to grow and to support and diversify the local economy;
 - ensure that new or improved infrastructure is delivered to support planned new development, including transport improvements, utilities and measures to reduce potential adverse environmental impacts;
 - plan for improved local and cultural facilities to meet the needs of the growing and ageing population;
 - provide for new and improved open space and green infrastructure;
 - achieve high quality design and encourage innovation;
 - preserve outstanding heritage and historic assets;
 - protect and enhance the area's biodiversity and habitats and positively plan for addressing the implications of climate change; and
 - help improve health and wellbeing.

Chapter 2 – Vision and Objectives

- 2.1. To provide clarity on the type of place the borough is anticipated to be, and what it will seek to achieve from development, the Local Plan should set out a vision. The vision should be ambitious, but achievable. In addition, to support this vision strategic objectives will prioritise outcomes and provide a reference point that ground and justify policies in the Local Plan.

Vision

- 2.2. The vision for the borough up to 2040 is:
- 2.3. In 2040 Epsom and Ewell will continue to provide a high quality of life and be an attractive place to live, work, study and visit. At the centre of its identity will continue to be the market town of Epsom, the University of Creative Arts, the Epsom Downs Racecourse and the conservation of its heritage.
- 2.4. New development will have delivered a range of new homes of varying sizes, meeting the needs of our changing population including those in specialist housing need, and from students through to older people.
- 2.5. New development will have been focussed on urban sites with the role of Epsom Town Centre of paramount importance having seen the most exciting and significant opportunities for growth.
- 2.6. New vibrant communities with their own identities will be centred around previously underdeveloped transport hubs and principal movement corridors.
- 2.7. The economy will be thriving, benefiting from high-speed digital infrastructure, and performing to its full economic potential, attracting new, and supporting existing businesses, from start-ups to larger companies.
- 2.8. The Epsom Downs racecourse will continue to be a significant part of the borough's unique identity and support a thriving equestrian sector.
- 2.9. Epsom Town Centre will have remained the principal urban centre in the borough and new development will have reflected and enhanced its urban qualities, with a rich collection of uses, compact neighbourhoods and safe streets. There will be more people living in the centre helping to support it as a prosperous market town, and support the existing shops, leisure cultural uses, public transport services and community facilities that are so valued by existing residents.
- 2.10. New development here will have secured investment in wider public realm improvements, providing more trees to help to cool streets in the summer and provide a more attractive place and new habitat for birds and other wildlife. It will be a place where people naturally choose to walk and cycle to and around, because the surrounding environment is even more pleasant.
- 2.11. The town centre will attract the best students and academic staff with modern facilities housing the University of Creative Arts and the Laine Theatre Arts School, who in turn contribute to the

local economy. Graduates will have access to affordable space within the town centre to make and sell their creations, making Epsom town centre even more distinctive from other nearby centres.

- 2.12. Ewell Village and Stoneleigh Broadway centres will continue to provide a distinct place identity and a hub for the community through convenience shopping and other commercial services such as professional services, restaurants, and public services like libraries. Infill and redevelopment opportunities will have been taken, increasing the number of residents served by these centres, helping to make them more viable in the long term.
- 2.13. Development across the borough will have been supported by improvements in community and transport infrastructure, with active travel networks having been a core part of growth in the borough improving air quality and benefiting the health and well-being of residents.
- 2.14. Epsom and Ewell will have remained a very green borough, valued by those who live in, work in and visit. Its network of green spaces that is embedded within communities will have been strengthened by development having delivered new public open spaces as well as enhancing the borough's existing streets and green spaces, improving habitats for wildlife, and providing better links to, from and between existing green and blue infrastructure, securing amenity for both new and existing residents.
- 2.15. Growth will have been different from what has gone before, with a greater emphasis on design and built quality and on the delivery of environmentally sustainable homes and communities for families and new residents who want to contribute positively to Epsom and Ewell's unique character. New development will have helped to redress past mistakes by replacing poorly designed buildings and spaces with higher quality development.
- 2.16. The borough's identity will have been strengthened, with the existing character of places in the borough having played an important role in shaping development proposals in terms of building materials, proposed built form, retention of important views and vistas and improvements to the public realm.

Strategic Objectives

2.17. The nine Strategic Objectives of this Local Plan are:

- 1) To provide a sustainable level of housing growth having regard to the borough's constraints, to meet future housing needs by identifying and maintaining a supply of land for housing ensuring this is of the right size, right type, provides the right tenure and is in the right location and provides a choice of housing for people at all stages of life.
- 2) To enhance the vitality and viability of Epsom Town Centre and the Local centres by supporting their diversification, and enhancement of the cultural offer and public realm.
- 3) To provide a sustainable level of economic growth to ensure that local people of all ages can find employment and remain in the borough by:

- a) ensuring that existing and new businesses can thrive whilst supporting growth sectors and the continued success of the borough's education establishments and equestrian sector; and
 - b) supporting the creative industries, including start-ups through the provision of appropriate business accommodation.
- 4) To ensure that development is supported by the necessary physical, social and green infrastructure to meet people's current and future needs.
 - 5) To maximise opportunities for those living, visiting, working and studying in the borough to access the diverse green and blue infrastructure network.
 - 6) To ensure that development does not have a detrimental impact on the borough's environmental assets including designated national sites, landscape character, water quality and biodiversity and that new development provides opportunities to provide for biodiversity net gains.
 - 7) To support measures that prioritise active and sustainable travel modes including improved facilities for pedestrians and cyclists and improvements to public transport.
 - 8) To deliver high quality and sustainable buildings and places that integrate into their surroundings and respond to local heritage.
 - 9) To support action on climate change and reduction of the borough's carbon emissions, aiding the transition to net zero through a combination of mitigation and adaptation measures.

Chapter 3 – Spatial Strategy

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

Policy S1 – Spatial Strategy

Housing

- 3.2. Significantly boosting the supply of homes is a key government objective and the scale of change required to boost housing supply across Epsom and Ewell is very significant. The borough must plan positively for this change. To achieve this, it is important that a sufficient amount and variety of land can come forward where it is needed, the needs of groups with specific housing requirements are addressed and, that land with planning permission is developed without necessary delay.
- 3.3. National Planning Policy requires that to determine the minimum number of homes, Local Plans should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The housing need for Epsom and Ewell generated by the standard method with a 2024 baseline is 569 dwelling per annum, which equates to 10,242 dwellings over the Local plan period. The Councils Housing and Economic Development Needs Assessment (HEDNA) 2023 confirms there is no justification to increase the housing need figure over that generated by the standard method.
- 3.4. The location of development in the borough is driven by the principle of sustainable development as set out in national policy. A ‘brownfield first’ approach has therefore been taken and the Local Plan seeks to make as much use as possible of existing suitable brownfield sites, including all publicly owned assets and landholdings. It is a priority that identified urban sites are developed in an efficient way to ensure they make a significant contribution to future housing provision.
- 3.5. The urban areas of the borough have been thoroughly assessed through the Land Availability Assessment (LAA) 2024, to identify the amount of development that could be sustainably and achievably accommodated. It was found that the urban sites can only provide approximately 3,336 dwellings (approximately 33% of the identified need for housing within the borough based on the standard methodology). This is based on the assumption that the urban sites identified as being suitable for development can be delivered over the plan period.
- 3.6. The council has therefore had to look at other options to boost housing supply. This has included exploring the potential for meeting the borough’s local housing needs outside of

Epsom and Ewell. However, based on current information, it is highly unlikely there will be any significant opportunities during the plan period to accommodate need outside of the borough boundary.

- 3.7. Given, the above and the scale of unmet housing need that would result from pursuing a brownfield only approach, the council considers that there is the justification and exceptional circumstances to make changes to the Green Belt boundaries within the borough, as allowed by national policy. The council is therefore proposing to make changes to the Green Belt boundary, and has followed national planning policy, which requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process.
- 3.8. The council considers that the scale of unmet development / housing needs in the borough that would result from pursuing a brownfield only approach provides the exceptional circumstances and justification to make changes to the Green Belt boundaries in the borough.
- 3.9. Through the release allocation of four sites that were previously located in the Green Belt, the council will be able to deliver an additional 1,580 dwellings over the plan period, which combined with the urban area supply equates to approximately 48% of the need established by the standard methodology. This is the council's preferred spatial strategy which balances social, economic and environmental objectives.

Gypsy, Traveller and Travelling Showpeople Accommodation

- 3.10. Gypsies, Travellers and Travelling Showpeople are recognised as ethnic groups and are protected from discrimination by the Equality Act 2010. The council is required to assess and plan for their specific needs for cultural appropriate accommodation.
- 3.11. A need for 18 pitches for Gypsy and Travellers has been identified through the Epsom and Ewell Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA), 2022.

Employment

- 3.12. Building a strong and competitive economy is a government objective and as part of plan making, the council is required to positively and proactively encourage sustainable economic growth.
- 3.13. The council has carried out a robust and objective assessment of its employment needs which is detailed in the HEDNA. This assessment takes account of economic and job growth forecasts over the Local Plan period, but also local intelligence on demand for employment floorspace to meet the needs of established businesses. The HEDNA shows that there is demand for additional employment floorspace in the area to meet the needs of existing businesses and to cater for new businesses.

- 3.14. Epsom and Ewell's principal industrial sites play an important economic role for the borough and wider region. Their continued commercial activity is essential with opportunities for intensification.
- 3.15. Modern employment accommodation that is compatible with residential uses will be encouraged to support the economic vitality of Epsom Town Centre.

Retail and Leisure

- 3.16. The NPPF states that the council should assess the quantitative and qualitative needs for land or floorspace for retail and leisure development over the next 10 years as a minimum. When planning for growth in its town and local centres, the council should allocate a range of suitable sites to meet the scale and type of retail and leisure development needed. It is important that the needs for retail, leisure and other main town centre uses are met in full and not compromised by limited site availability.
- 3.17. The council has carried out a Retail and Commercial Leisure Needs Assessment (2020 and update 2021), which identifies no substantial additional comparison or convenience needs and recommends a strategy of consolidation rather than growth for Epsom Town Centre and Stoneleigh and Ewell Village local centres.

The Spatial Strategy

- 3.18. This is the beginning of a new period of growth for the borough. The council is ambitious and determined that this will strengthen and enhance the character of the borough. Growth must be different from what has come before, there will be a greater emphasis on design and built quality and on the delivery of environmentally sustainable homes and communities for families and new residents who want to contribute positively to Epsom and Ewell's unique character.
- 3.19. Our development strategy for the plan period recognises the environmental constraints, the availability of land for development, the viability of development and the need to balance matters such as supporting the local economy and providing for affordable housing.
- 3.20. Development will first be directed to the most sustainable locations, making the best use of previously developed land in the urban area. In sequential order these locations and further detail on their role in the spatial strategy is shown in Figure 3.1.
- 3.21. Whilst these sustainable locations are our preferred locations for new development, they do not deliver adequate housing to meet our social responsibilities for providing housing. For this reason, the Spatial Strategy incorporates appropriate previously developed land within the existing built-up area currently designated as Green Belt and green field land in the most sustainable locations adjacent to the existing built-up areas that is currently designated as Green Belt.
- 3.22. The Hierarchy of Development is detailed overleaf:.

Epsom Town Centre

- 3.23. Epsom town centre is the principal urban centre and the most sustainable location in the borough to accommodate new high density housing development due to its greater access to public transport, services and amenities. More people living in the centre will help to support Epsom as a thriving and prosperous market town, and support the existing shops, leisure cultural uses, public transport services and community facilities that are so valued by existing residents. The town centre is the most sustainable location for other uses such as new retail, leisure and office development. Intensification of these uses is encouraged to meet needs, which will enhance the mix of uses and vibrancy of the town centre. New development should reflect and enhance its urban qualities – a rich collection of uses, compact neighbourhoods, safe streets.
- 3.24. The Local Plan contains thirteen strategic allocations within Epsom Town Centre, some of which have been informed by the Epsom Town Centre Masterplan. The regeneration of these sites will deliver new housing (including specialist accommodation) and additional education floorspace.

Kiln Lane and Longmead Industrial Estates

- 3.25. Strategic employment sites will continue to play an important economic role for the borough and wider region. These remain most appropriate for employment uses and while there may be limited opportunities for mixed used development within these sites, this must not undermine their commercial role. Opportunities for intensification will be encouraged in these areas to meet employment needs as identified in the HEDNA.
- 3.26. A small extension is proposed to the Longmead Industrial Estate (as shown on the policies map) to include an area of land to the North that is currently amenity land surrounding the Kings Church. This site will enable limited expansion of the site for employment uses.

Other centres and train stations within the urban area

- 3.27. In accordance with the National Planning Policy, the Local Plan defines a hierarchy of centres and ensures new main town uses are focused within these centres to maintain vitality and viability.
- 3.28. These centres fulfil several important functions for the borough including providing a distinct place identity and a hub for the community. In addition, Epsom town centre, the two local centres, Ewell Village and Stoneleigh, there are neighbourhood parades, which help to meet day to day needs through convenience shopping and other commercial services such as professional services, restaurants and public services like libraries.
- 3.29. The borough has three train stations beyond Epsom Town Centre (as defined on the policies map), these are Ewell East, Ewell West and Stoneleigh.

The wider urban area

- 3.30. Between the borough's network of centres; between the pedestrian catchments of its railway stations; away from the borough's principal road corridors, opportunities will arise for the redevelopment of sites. It is important these sites that come forward for housing growth accommodate higher density development that makes best use of available land.
- 3.31. Whilst these sustainable locations are our preferred locations for new development, they do not deliver adequate housing to meet our social responsibilities to provide additional housing. For this reason, the Local Plan contains five site allocations that will make a substantial contribution towards meeting housing and Gypsy and Traveller accommodation needs over the Plan period on land that is inset from the Green Belt.
- 3.32. Spatial Strategy incorporates appropriate previously developed land within the existing built-up area currently designated as Green Belt (site allocations SA31 and SA32) and green field land in the most sustainable locations adjacent to the existing built-up areas that are proposed to be removed from the Green Belt (site allocations SA33 to SA35).
- 3.33. When considering all sources of supply, the Local Plan housing requirement has been set as a minimum of 4,700 dwellings over the plan period (2022-2040). How the council will achieve this minimum requirement is set out in Table S1a below. It should be noted that the supply includes a windfall allowance, which is based on past delivery trends. The total supply exceeds the requirement by 216 dwellings, which provides a degree of flexibility over the Local Plan period should sites fail to be delivered. Further details of the sites that are key to delivering the strategy are contained in the site allocations policies of the Local Plan and shown on the Policies Map. How and when the different sources of supply are anticipated to deliver housing is contained in the Housing Trajectory (Appendix 2).

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

Source of supply	Net no. of units
Housing Requirement	4,700
Housing completion to date (April 2022 to March 2024)	456
Commitments (permissions as of April 2024) with 10% lapse rate applied	600
Windfall (1-4 units)	455
Windfall (5-19 units)	407
Large urban sites (20+ units)	1,308
Small urban sites (5 to 19 units)	110
Allocations beyond current urban area to be inset from the Green Belt	1,580
Total supply over the plan period	4,916

3.34. The spatial strategy presents exciting opportunities to create new vibrant communities in the borough, centred around currently underdeveloped transport hubs or through the development of larger sites. These developments will form new communities and grow to be distinct places with their own identities. They will need to be supported by appropriate investments in community and transport infrastructure to ensure existing and new residents are supported in terms of movement, health, education and other services.

Policy SA1 – Spatial Strategy

- 1) During the plan period (2022-2040), provision has been made for at least 4,700 new homes. Table S1a shows the contribution of all sources of housing supply.
- 2) Employment needs (office, light industrial, industrial and warehousing) will be met through the development and intensification of the strategic employment sites (as defined on the policies map), and the delivery of additional employment floorspace that is compatible with residential use in Epsom Town Centre.
- 3) Retail needs will be met through the consolidation and enhancement of existing facilities within existing Epsom town centre, local centres and neighbourhood parades.
- 4) Provision has been made for 10 permanent pitches for Gypsies and Travellers within Epsom and Ewell over the plan period. The council will seek to make provision for additional pitches for Gypsies and Travellers by permitting suitable sites.

Policy S2 – Sustainable and Viable Development

- 3.35. Local Plans should be based upon and reflect the presumption in favour of sustainable development detailed in the National Planning Policy Framework. The principle informs both the policies and site allocations contained within the Local Plan and will be used to guide decision making.
- 3.36. To facilitate an efficient decision-making process, any financial viability report/appraisal must be in compliance with the Homes England Development Appraisal Tool (DAT) or any future equivalent standard. If this is not provided it will delay the application or lead to the refusal of planning permission.
- 3.37. Where proposals have been tested and concluded to be viable through the Local Plan viability assessment, the applicant will need to use the Local Plan viability assessment as the benchmark and state what has changed to make the proposal unviable.
- 3.38. In assessing the information supplied in a financial appraisal, the council will always seek to ensure that its decision represents the appropriate balance between the desirability of securing delivery of the development, and that of providing in full for the standards set out in planning policy. However, a financial appraisal submitted in support of a development is only current at the time it is prepared. Financial viability will vary over time with the changing economic and property markets. Therefore, the council will require late-stage viability review mechanisms through s106 agreements where policy requirements are not met in full at the time permission is granted.
- 3.39. The council's position for late-stage viability reviews is that all major developments, including residential development, include at least, an outturn retest 75% of the way through the development to compare actual costs and values with those assessed at the application stage.
- 3.40. On larger sites that are expected to be built out over a number of years, or in phases, the council will require viability to be re-assessed at multiple stages (such as prior to the commencement of different phases).
- 3.41. For schemes where the outturn test demonstrates that viability has improved and the scheme did not satisfy the affordable housing requirement set out in the Local Plan, the council will expect additional affordable housing to be provided on site or in exceptional circumstances, an in-lieu contribution to off-site affordable housing, will be required.

Policy S2: Sustainable and Viable Development

Sustainable development

- 1) When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the

National Planning Policy Framework. The council will always work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

- 2) Planning applications that accord with the policies in the Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
- 3) Where there are no policies relevant to the application or they are out of date at the time of making the decision then the council will grant permission unless material considerations indicate otherwise – taking into account whether:
 - a) any adverse impacts of granting planning permission would significantly and demonstrable outweigh the benefits, when assessed against the policies in the National Planning Policy Framework or taken as a whole; or
 - b) specific policies in the National Planning Policy Framework indicate that development should be restricted.

Viable Development

- 4) Viability will only be considered a constraint in exceptional circumstances and where there are significant additional costs not anticipated through the Local Plan process.
- 5) In order to demonstrate viability constraints to justify not meeting the local plan policy requirements in full, proposals must be supported by viability study. This will normally take the form of a published open book financial appraisal of the proposed development, demonstrating the full range of costs to be incurred by the development including the initial purchase of the land, the financial return expected to be realised, and the profit expected to be released.
- 6) Where an applicant submits a viability assessment, the council will commission an independent review the costs of which will be funded by the applicant.
- 7) Where it is concluded that the development would be unviable if it were to comply with the policies in this plan, the council will require an applicant to enter into a legal agreement to review viability at a specific stage or stages in the delivery of the development.

Key supporting documents

Local Plan Viability Assessment (2023)

Policy S3 – Climate Change and Mitigation

- 3.42. Climate change will present major challenges affecting people's lives, homes and businesses, which need to be considered in the delivery of new development. Mitigating against and adapting to climate change is an international, national and local priority.
- 3.43. The Climate Change Act commits the UK Government to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. The Government expects each local authority to contribute to meeting the targets and reducing overall demand for energy.
- 3.44. In July 2019, the Council committed to tackling climate change in the borough and produced a first Climate Change Action Plan in 2020. A second version of the action plan was adopted in October 2024, to cover the period 2025-2029, and includes commitments to:
- Develop and deliver a Local Plan and associated policies that contribute positively and demonstrate the Council's commitment to climate change.
 - Adopt a Local Plan with design policies addressing climate change mitigation and adaptation. Inclusive of low carbon design, energy efficient buildings, sustainable transport and minimising environmental impact.
- 3.45. The council has an important role in shaping new and existing developments in ways that reduce carbon emissions and positively build community resilience to problems such as flood risk or heat stress. Policies in the Local Plan must ensure that development within the borough contributes to the mitigation of, and adaptation to climate change. The council is committed to tackling climate change and this policy sets out the overarching policy approach to climate change, drawing on the evidence from the Epsom and Ewell Climate Change Study – Stage 1 (2022) and the emerging Surrey County Council Net Zero Toolkit (2024).
- 3.46. It is important that buildings are designed to be resilient not just in the short term but throughout their anticipated lifetime. This should include designing buildings to keep cool without using power through the use of appropriate construction materials, layout and building orientation and the use of green infrastructure for urban cooling and shading. Consideration should also be given to the need for water conservation through a range of water efficiency measures.
- 3.47. The likelihood of flooding is predicted to increase because of climate change causing more extreme weather events. A Strategic Flood Risk Assessment (SFRA) - Level 1 has been produced which identifies the areas at highest risk of flooding in the borough (Flood Zones 2, 3a and 3b). It is important to ensure that new development avoids areas of high flood risk or where development is necessary in such areas, the development should be made safe for its lifetime and avoid flood risk elsewhere.
- 3.48. Developments should be designed to minimise surface water flooding through the use of Sustainable Drainage Systems (SUDS).

- 3.49. The use of renewable energy rather than fossil fuels will help to reduce carbon emissions and thus reduce climate change.
- 3.50. Successful adaptation to climate change requires a holistic approach, which includes everything from flood risk to heat stress. Green infrastructure plays an important role in climate change mitigation, contributing to climate change adaptation, including through reducing heat stress and the potential for surface water flooding.
- 3.51. The Local Plan Viability Assessment has tested the requirements detailed in the policy and associated supporting policies to ensure that they do not undermine the delivery of the Local Plan by making development unviable.

Policy S3 – Climate Change and Mitigation

Climate Change Mitigation

- 1) New development will be permitted that mitigate the impacts of climate change by:
 - a) Incorporating low or zero carbon design and improving the energy efficiency of buildings;
 - b) supporting renewable and low carbon energy and heating schemes for major development proposals;
 - c) directing development to locations that will minimise the need to travel and maximise the use of sustainable modes of transport including cycling, walking and public transport, promoting a modal shift away from private car use;
 - d) there is no net loss in the carbon storage capacity provided by the borough's trees;
 - e) increasing the potential for green infrastructure and habitats through biodiversity net gain to support carbon sequestration and store carbon;
 - f) supporting the low carbon economy; and
 - g) adopting a circular economy approach to building design and construction to reduce waste, to keep materials and products in use for as long as possible, and to minimise embodied carbon.

Climate Change Adaptation

- 2) New development will be permitted which are resilient to climate change and contribute to healthy living by:
 - a) being designed so as to maximise the potential for climate change adaptation, to ensure that new development minimises vulnerabilities and provides resilience to impacts arising from climate change;

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- b) maximising sustainable water use;
 - c) addressing existing and future flood risk;
- 3) maximising the potential of green and blue infrastructure in the design of new development;
- a) planting trees and other vegetation, where appropriate as part of the landscape scheme, to provide shading of buildings, streets and open spaces / amenity areas;
 - b) delivering biodiversity net gain; and
 - c) minimising the potential for heat stress, through innovative design.

Key supporting documents

- Epsom and Ewell Climate Change Study – Stage 1 (2022)
- Local Plan Viability Assessment (2023)
- Emerging Surrey County Council Net Zero Toolkit (2024)

Policy S4 – Epsom Town Centre

- 3.52. Epsom Town centre is the main centre for the borough and provides for a mix of shopping, business, leisure, civic, cultural and community activities. The boundary of the town centre is shown on the Policies Map.
- 3.53. It is important that the town centre continues to diversify and attract uses other than retail to the town centre to reflect the social and economic changes that have affected demand for retail and office space and investment. Developing the night time economy is a key opportunity, with recent investment in a new cinema and the Playhouse Theatre.
- 3.54. The Epsom Town Centre Masterplan identified opportunity sites that could be redeveloped in the town centre to meet development needs and these sites are allocated in the local plan and make a key contribution towards delivering the Spatial Strategy.
- 3.55. The Town Centre Masterplan also identifies some potential public realm improvements that could be implemented in the town centre, subject to further feasibility work being undertaken.
- 3.56. The Town Centre contains a wide range of heritage assets including nationally and locally listed buildings and Conservation Areas which make a valuable contribution to the character of the town centre.

Policy S4 – Epsom Town Centre

- 1) The Council will work with partners and private developers to:
 - a) Encourage the regeneration of the town centre to deliver high quality development through the redevelopment of the site allocations detailed in this plan and other windfall sites that may come forward in the future;
 - b) Encouraging a diverse mix of uses, where possible, including housing (including specialist accommodation), retail, offices, higher education and the creative and cultural industry, food and drink establishments, health and community spaces;
 - c) Maintain and enhance the visitor experience and night time economy;
 - d) Retain and enhance existing markets and support opportunities for the creation of new markets;

- e) Deliver high quality public realm integrating tree planting, landscaping and good quality design to assist in delivering the aspirations of the Epsom Town Centre Masterplan;
- f) Support the delivery of the Surrey Local Transport Plan 4 and any successors, and proposals in the Epsom and Ewell Local Cycling and Walking Infrastructure Plan to support the transition towards zero carbon transport;
- g) Ensure the distinctive character of Conservation Areas within the Town centre boundary are conserved and, where possible, enhanced.

Key supporting documents

- Epsom Town Centre Masterplan (2024)
- Surrey Local Transport Plan (2024)
- Epsom and Ewell Local Cycling and Walking Infrastructure Plan (2024)
- Conservation Area Appraisals

Chapter 4 – Planning for Places

- 4.1. This chapter sets out how the Spatial Strategy (Policy S1) will be delivered and includes 35 site allocations.
- 4.2. The site allocations in this chapter are informed by a range of evidence base that supports the Local Plan, including the findings of the Land Availability Assessment ('LAA'), the Site Assessment and the Sustainability Appraisal. Development is directed to the most sustainable locations, making the best use of previously developed land in the first instance.
- 4.3. Site Allocations SA1 – SA30 - set out the residential-led site allocations within the borough's urban area, whilst policies SA31-SA35 allocate land for development by that is to be inset from the Green Belt. The Local Plan contains numerous other policies, which also apply to these sites in addition to the specific requirements set out in the site allocation policies. Where site allocation policies set out requirements that are more stringent than those in another policy within the Local Plan, the site allocation policy will take precedence.
- 4.4. Together, the site allocations seek to deliver a significant proportion of the Local Plan's housing requirement.

Site SA1 – Southern Gas Network Site

Allocated for: Approximately 455 dwellings (C3) and a bespoke performing arts centre for the Laine Theatre Arts

Site Area: 1.54ha

Planning history: Application 24/01107/FUL



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site.
- b) Provide a linear open space to provide permeability through the site for pedestrians and cyclists into and from the development to provide connectivity between Hook Road and the Rainbow leisure Centre.
- c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.
- d) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in policy S16.
- e) Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.
- f) Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the railway that adjoins the northern boundary of the site.
- g) Conserve and, where possible, enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings that adjoin the site.
- h) Undertake archaeological investigations in accordance with policy DM13, taking account of the site's location within an Area of High Archaeological Potential.
- i) Designed to enable the comprehensive redevelopment of the adjoining Hook Road Car Park site (Site Allocation SA2) as a future phase.

Site SA2 – Hook Road Car Park

Allocated for: Approximately 150 dwellings

Site Area: 0.48 ha

Planning history: None



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site.
- b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.
- c) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in policy S16.
- d) Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.
- e) Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the railway that adjoins site.
- f) Conserve and, where possible, enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings.
- g) Undertake archaeological investigations in accordance with policy DM13, taking account of the site's location within an Area of High Archaeological Potential.
- h) Be designed as a future phase of the adjoining Southern Gas Networks Site (Site Allocation SA1).

Site SA3 – Solis House, 20 Hook Road

Allocated for: Approximately 20 dwellings (C3)

Site Area 0.07 ha

Planning history None



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site from Hook Road.
- b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.
- c) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.
- d) Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining railway line.
- e) Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.
- f) Conserve and, where possible, enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings.
- g) Undertake archaeological investigations in accordance with Policy DM15, taking account of the site's location within an Area of High Archaeological Potential.

Site SA4 – Bunzl, Hook Road

Allocated for:	Approximately 20 dwellings
Site Area:	0.17 ha
Planning history:	24/00230/FUL & 23/01440/PDCOU



In addition to complying with the policies in the plan, any developer of this site will be required to:

- Provide appropriate vehicle, pedestrian and cycle access to the site.
- Conserve and, where possible, enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings at 10 and 12 Hook Road.
- Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.
- Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.
- Investigate and if identified remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.

Site SA5 – Epsom Town Hall

Allocated for: Approximately 90 dwellings (C3)

Site Area 0.74 ha

Planning history: None



In addition to complying with the policies in the plan, any developer of this site will be required to:

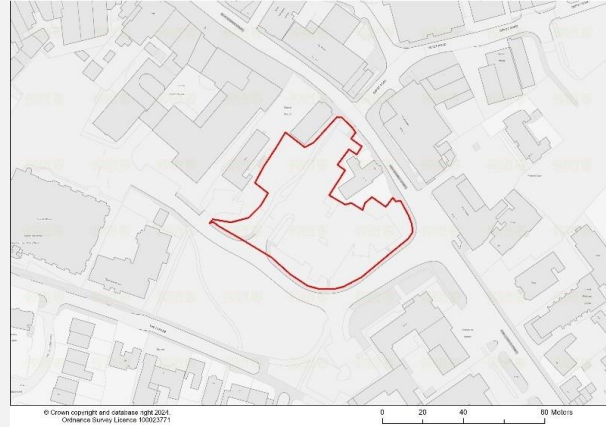
- a) Provide appropriate vehicle, pedestrian and cycle access to the site from Dulshott Green.
- b) Maximise retention and safeguarding of existing trees and incorporate them into a well-integrated landscape strategy.
- c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.
- d) Design surface and foul water drainage to include all required measures arising from the site being located in Ground Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.
- e) Undertake archaeological investigations in accordance with Policy DM15, taking account of the site's location within an Area of High Archaeological Potential.
- f) Conserve and, where possible, enhance the setting of the Epsom Town Centre Conservation Area and the Grade II listed 'Old Pines' that are located in close proximity to the site.

Site SA6 – Hope Lodge Car Park

Allocated for: Approximately 30 dwellings (C3)

Site Area: 0.4 ha

Planning history: None



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site from Dulshott Green;
- b) Maximise retention and safeguarding of existing trees and hedgerows, and incorporate them into a well-integrated landscape strategy;
- c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16;
- d) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.
- e) Undertake archaeological investigations in accordance with policy DM15, taking account of the site's location within an Area of High Archaeological Potential.
- f) Conserve and, where possible, enhance the setting of Grade II Listed Hope Lodge that adjoins the site boundary to the East.

Site SA7 – Former Police and Ambulance Station Sites

Allocated for: Erection of a new 85 bedroom residential, nursing and dementia care home for the frail elderly (Use Class C2).

Site Area: 0.37 ha

Planning history: 22/00923/FUL (approved, subject to S106 agreement).



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site from Church Street.
- b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.
- c) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.
- d) Conserve and, where possible, enhance the setting of Grade II building at 45 Church Street that lies beyond the site boundary.
- e) Minimise loss of existing trees, including appropriate root protection for those immediately adjacent to the site.

Site SA8 – Epsom Clinic

Allocated for: Approximately 30 dwellings

Site Area: 0.17 ha

Planning history: None



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site from Dulshott Green.
- b) Conserve and, where possible, enhance the setting of the Church Street Conservation Area that adjoins the site boundary to the South West and the Grade II Listed Hope Lodge that lies beyond the site boundary to the North.
- c) Undertake archaeological investigations in accordance with Policy DM15, taking account of the site's location within an Area of High Archaeological Potential.
- d) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.
- e) Design surface and foul water drainage to include all required measures arising from the site being in Groundwater Source Protection Zone 1.
- f) Minimise the loss of existing trees and hedgerows within the site.

Site SA9 – Depot Road and Upper High Street Car Park

Allocated for: Approximately 100 dwellings (C3) and a decked public car park

Site Area: 1.24 ha

Planning history: None



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site from Upper High Street and Church Street.
- b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.
- c) Have regard to the setting of the adjoining Pikes Hill Conservation Area
- d) Have regard to the high voltage power cables that run under part of the site to serve the adjoining electricity sub station in the design of the development.
- e) Undertake archaeological investigations in accordance with Policy DM15, taking account of the site's partial location within an Area of High Archaeological Potential.
- f) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.

Site SA10 – 79-85 East Street

Allocated for: Approximately 35 dwellings (C3)

Site Area: 0.22 ha

Planning history: 22/01953/FUL and 22/01954/FUL



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining A24.
- b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.
- c) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.
- d) Conserve and, where possible, enhance the setting of the adjoining Lintons Lane Conservation Area and Grade II Listed buildings.

Site SA11 – Finachem House, 2 – 4 Ashley Road

Allocated for: Approximately 20 dwellings (C3)

Site Area: 0.12 ha

Planning history: Pre-application



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site from the Ashley Road.
- b) Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining A24.
- c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.
- d) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.
- e) Conserve and, where possible, enhance the setting of the Epsom Town Centre Conservation Area and the Grade II* listed 'Ashley House' that adjoin the site boundary to the North.
- f) Undertake archaeological investigations in accordance with Policy DM15, taking account of the site's location within an Area of High Archaeological Potential.

Site SA12 – Global House

Allocated for: Approximately 75 dwellings (C3)

Site Area: 0.29 ha

Planning history: None



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate pedestrian and cycle access to the site.
- b) Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining A24.
- c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.
- d) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.
- e) Conserve and, where possible, enhance the setting of the nearby Epsom Town Centre Conservation Area and listed buildings.
- f) Undertake archaeological investigations in accordance with Policy DM15, taking account of the site's location within an Area of High Archaeological Potential.

Site SA13 – Swail House

Allocated for:	Refurbishment of Swail House for residential use and the provision of replacement purpose-built specialist accommodation for the RNIB consisting of approximately 45 dwellings (net) located to the rear of Swail House
Site Area:	1.05 ha
Planning history:	None



In addition to complying with the policies in the plan, any developer of this site will be required to:

- Provide appropriate vehicle, pedestrian and cycle access to the site from Heathcote Road
- Ensure the site layout maximises retention and safeguarding of mature existing trees, including those covered by a Tree Preservation Orders, incorporating them in a coherent landscaping strategy for the site.
- Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.
- Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.
- Conserve and, where possible, enhance the setting of the Church Street conservation area that adjoins the site.
- Retention of the Grade II listed wall that forms part of the site boundary.
- Undertake archaeological investigations in accordance with Policy DM15, taking account of the site's location within an Area of High Archaeological Potential.

Site SA14 – 60 East Street

Allocated for: Approximately 30 dwellings (C3).

Site Area: 0.24 ha

Planning history 24/00900/PDCOU



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site
- b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.
- c) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.

Site SA15 – Corner of Kiln Lane and East Street (101b East Street)

Allocated for:	Approximately 5 dwellings
Site Area:	0.03 ha
Planning history:	15/01663/FUL (unimplemented)



In addition to complying with the policies in the plan, any developer of this site will be required to:

- Provide appropriate vehicle, pedestrian and cycle access to the site from Kiln Lane.
- Design surface and foul water drainage to include all required measures arising from the site being located in Source Protection Zone 1.

Site SA16 – Land at Kiln Lane

Allocated for: Approximately 40 dwellings

Site Area: 0.67 ha

Planning history: None



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site
- b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.
- c) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.

Site SA17 – Hatch Furlong Nursery

Allocated for: Approximately 30 dwellings (C3)

Site Area: 0.5 ha

Planning history: None



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site from Castle Way or the A24 Ewell Bypass which meets all relevant requirements of the Highways Authority with regard to accessibility and safety.
- b) Maximise retention and safeguarding of existing trees and hedgerows, and incorporate them into a well-integrated landscape strategy.
- c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.
- d) Design surface and foul water drainage to include all required measures arising from the site being in Groundwater Source Protection Zone 2.
- e) Undertake archaeological investigations in accordance with policy DM15, taking account of the site's location within an Area of High Archaeological Potential.
- f) Provide suitable noise attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from traffic on the A24 Ewell Bypass.

Site SA18 – Land to the Rear of Rowe Hall

Allocated for:	Extra Care Accommodation (Class C2) comprising 96 self-contained apartments, staff and communal facilities
Site Area:	1.23 ha
Planning history:	Outline Planning Application Granted June 2024 Reference: EP23/00633/CMA



In addition to complying with the policies in the plan, any developer of this site will be required to:

- Provide appropriate vehicle, pedestrian and cycle access to the site from the Salisbury Road.
- Provide a revised Scouts Hut curtilage to include a new amenity area.
- Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.
- Maximise the retention and safeguarding of existing mature trees within the site and incorporate those features in a coherent landscaping strategy for the site.

Site SA19 – 7 Station Approach

Allocated for:	Approximately 5 dwellings (C3)
Site Area:	0.04 ha
Planning history:	21/01156/FUL – Redevelopment to provide 13 residential units (Class C3) within a part 3, part 4 storey building (Refused)



In addition to complying with the policies in the plan, any developer of this site will be required to:

- Provide appropriate vehicle, pedestrian and cycle access to the site.
- Design surface and foul water drainage to include all required measures arising from the site being located in a Groundwater Source Protection Zone.

Site SA20 – Esso Express, 26 Reigate Road

Allocated for: Approximately 10 dwellings (C3)

Site Area: 0.25 ha

Planning history: None



In addition to complying with the policies in the plan, any developer of the site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access.
- b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.
- c) Ensure the site layout maximises retention and safeguarding of mature existing trees, incorporating these in a coherent landscaping strategy for the site.
- d) Undertake archaeological investigations in accordance with Policy DM15, taking account of the site's location within an Area of High Archaeological Potential.

Site SA21 – Richards Field Car Park

Allocated for: Approximately 7 dwellings

Site Area: 0.07 ha

Planning history: None



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site from Chessington Road.
- b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.

Site SA22 – Etwelle House, Station Road

Allocated for: Approximately 20 dwellings (C3)

Site Area: 0.2 ha

Planning history: 07/00104/OUT - 10 semi-detached dwellings (not implemented)



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site from Station Approach.
- b) Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.
- c) Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining railway station and railway line.

Site SA23 – 140-142 Ruxley Lane

Allocated for:	Approximately 12 dwellings (C3)
Site Area:	0.2 ha
Planning history:	23/00588/FUL – Redevelopment into 14 dwellings (Granted)



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access from Ruxley Lane.
- b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.
- c) Ensure the site layout maximises retention and safeguarding of mature existing trees, incorporating these in a coherent landscaping strategy for the site.

Site SA24 – Garages at Somerset Close & Westmorland Close

Allocated for: Approximately 6 dwellings (C3)

Site Area: 0.10 ha

Planning history: Multiple applications for the redevelopment of garages to 6 flats (20/01758/FUL - 20/01760/FUL) - refused



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access.
- b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.

Site SA25 – 64 South Street Epsom

Allocated for: Approximately 6 dwellings

Site Area: 0.14 ha

Planning history: 20/00041/FUL - COU from B1 to 6 dwellings (LAPSED)



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site from South Street (A24).
- b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.
- c) Design surface and foul water drainage to include all required measures arising from the site being located in Source Protection Zone 1.
- d) Undertake archaeological investigations in accordance with Policy DM15, taking account of the site's location within an Area of High Archaeological Potential.
- e) Conserve and, where possible, enhance the setting of the Woodcote Conservation Area and the adjacent Grade II listed 'Abel Cottages'.

Site SA26 – 35 Alexandra Road

Allocated for: Approximately 8 dwellings (C3)

Site Area: 0.1 ha

Planning history: 21/01920/FUL - 9 flats (withdrawn)

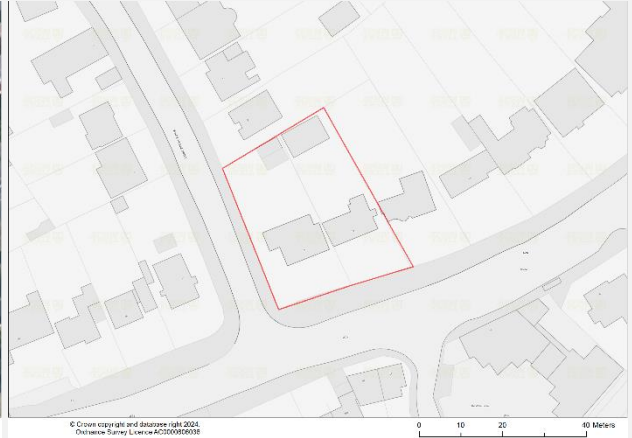


In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site.
- b) Ensure the site layout maximises retention and safeguarding of mature existing trees, including the tree covered by a Tree Preservation Order, incorporating these in a coherent landscaping strategy for the site.
- c) Design surface and foul water drainage to include all required measures arising from the site being located in Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.

Site SA27 – 22-24 Dorking Road

Allocated for:	Approximately 18 dwellings
Site Area:	0.12 ha
Planning history:	19/01365/FUL - Demolition and erection of 20 flats (Refused)



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site from Dorking Road or White Horse Drive.
- b) Conserve and, where possible, enhance the setting of the Grade II* and Grade II listed buildings in close proximity to the site.

Site SA28 – 63 Dorking Road

Allocated for: Specialist Care Home (C2) with ancillary nurses accommodation (equivalent to 6 net C3 dwellings)

Site Area: 0.14 ha

Planning history: None



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site from Hylands Mews.
- b) Conserve and enhance the part of the building that is Grade II Listed and the setting of the Grade II Listed buildings adjoining the site.

Site SA29 – 65 London Road

Allocated for:	Care home up to 81 bedrooms (use class C2)
Site Area:	0.30 ha
Planning history:	23/00817/FUL (approved, but not implemented), 22/00728/FUL (approved, but not implemented) and 20/01079/FUL (approved, but not implemented)

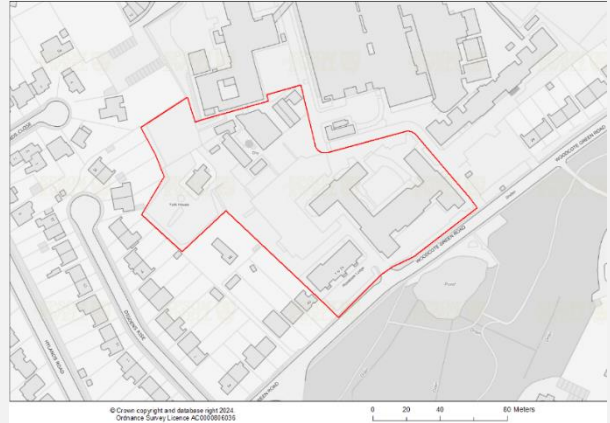


In addition to complying with the policies in the plan, any developer of this site will be required to:

- Provide appropriate vehicle, pedestrian and cycle access to the site from London Road.
- Design surface and foul water drainage to include all required measures arising from the site being located in Source Protection Zone 2, as well as meeting the requirements for sustainable drainage in Policy S16.
- Conserve and, where possible, enhance the setting of the Grade II listed buildings in close proximity to the site.

Site SA30 – Epsom General Hospital

Allocated for:	Approximately 305 units older people's accommodation (Use Class C2), 24 key worker dwellings (C3) and a children's nurse (Use Class E)
Site Area:	1.45 ha
Planning history:	21/00252/FUL (granted at appeal, development commenced), 20/00108/FUL (approved) and 19/01722/FUL (refused)



In addition to complying with the policies in the plan, any developer of this site will be required to:

- Provide appropriate vehicle, pedestrian and cycle access to the site from Woodcote Green Road.
- Satisfy the requirements for sustainable drainage in Policy S16.

Site SA31 – Land at West Park Hospital (South)

Allocated for: Approximately 50 dwellings (C3)

Site Area: 1.81 ha

Planning history: None



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site and enable the site to be served by public transport.
- b) Establish a legal mechanism for long term management of green infrastructure, providing access for recreational purposes by the general public as well as residents of the development.
- c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.
- d) Conserve and, where possible, enhance the setting of the West Park Conservation Area.
- e) Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees, incorporating these in a coherent landscaping strategy for the site.
- f) Undertake archaeological investigations in accordance with Policy DM15, taking account of the site's location within an Area of High Archaeological Potential.

Site SA32 – Land at West Park Hospital (North)

Allocated for: Approximately 150 dwellings (C3)

Site Area: 5.22 ha

Planning history: None



In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site and enable the site to be served by public transport.
- b) Provide permeability through the site for pedestrians and cyclists into and from the development to provide connectivity between adjoining residential areas and Horton County Park.
- c) Establish a legal mechanism for long term management of green infrastructure and children's play space on the site, providing access for recreational purposes by the general public as well as residents of the development.
- d) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.
- e) Conserve and, where possible, enhance the setting of the West Park Conservation Area that lies to the south of the site.
- f) Ensure the site layout that retains and safeguards existing mature trees as part of a coherent landscaping strategy for the site.
- g) Undertake archaeological investigations in accordance with Policy DM15, taking account of the site's location within an Area of High Archaeological Potential.

Site SA33 - Land at Chantilly Way

Allocated for: Approximately 30 dwellings (C3)

Site Area: 0.7 ha

Planning history: None

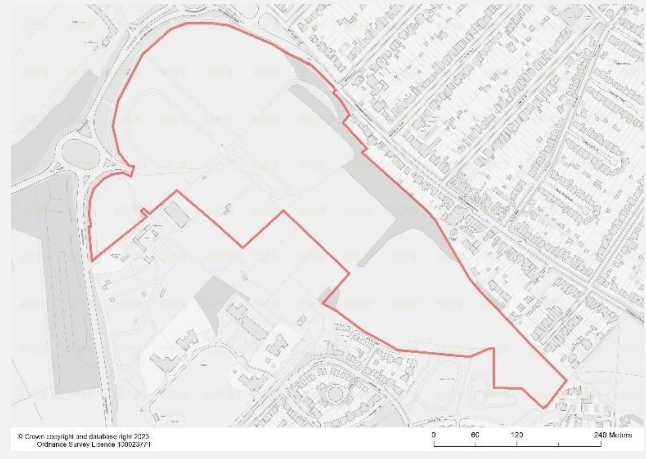


In addition to complying with the policies in the plan, any developer of this site will be required to:

- a) Provide appropriate vehicle, pedestrian and cycle access to the site from Chantilly Way.
- b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.
- c) Conserve and, where possible, enhance the setting of Grade II Listed Horton Farm House that lies beyond the site boundary to the North West.
- d) Minimise the loss of existing trees, including appropriate root protection for those immediately adjacent to the site.
- e) Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.

Site SA34 – Hook Road Arena

Allocated for:	New Sports Hub for the borough to include playing pitches (grass and artificial), a new pavilion and changing facilities. The provision of approximately 100 dwellings (C3) on the eastern part of the site.
Site Area:	14 ha
Planning history:	None

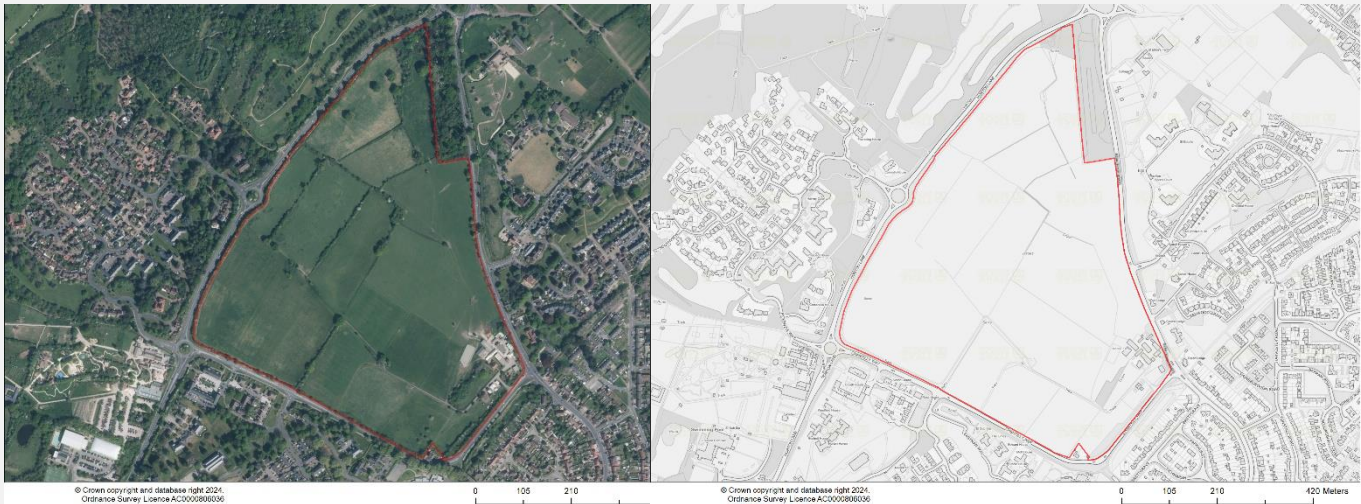


In addition to complying with the policies in the plan, any developer of this site will be required to:

- Provide appropriate vehicle, pedestrian and cycle access to the site from the existing access on Hook Road.
- Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.
- Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees, incorporating these in a coherent landscaping strategy for the site.
- Achieves a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.

Site SA35 – Land at Horton Farm

Allocated for:	Approximately 1,250 dwellings (C3) including some specialist housing and self-build plots, 10 gypsy and traveller pitches, business incubation space, community building and a public park of approximately 7ha in addition to other green and blue infrastructure.
Site Area:	37.9 ha
Planning history:	None



In addition to complying with the policies in the plan, any developer of this site will be required to:

- Provide appropriate vehicle, pedestrian and cycle access to the site and enable the site to be served by public transport.
- Provide permeability through the site for pedestrians and cyclists into and from the development to provide connectivity between adjoining residential areas and associated facilities and Horton County Park.
- Provide a community building, capable of accommodating early years education provision and other community uses responding to the needs of the locality.
- Provide additional primary care capacity required to serve local needs. This could take the form of on-site provision integrated into a community building which accommodates primary health care provision alongside community health and wellbeing services required to meet the area's needs, or an equivalent financial contribution towards off-site provision of new or improvement to existing health facilities. The form of required additional primary care provision will be determined in consultation with the NHS at the time the site comes forward.
- Provide a public park of approximately 7ha within the land to the North of the site incorporating walking, cycling routes, equestrian routes and measures for surface water management and biodiversity enhancement.

- f) Establish a legal mechanism for long term management of green and blue infrastructure and children's play space on the site, providing access for recreational purposes by the general public as well as residents of the development.
- g) Incorporate an area of approx. 0.6ha, with access to the highway and utilities connections, suitable for delivery of gypsy and traveller pitches (10 pitches).
- h) The pitches will be public (tenure) forming part of the affordable housing contribution (1 pitch equates to 1 affordable home). Pitches should be serviced pitches, providing hard standing, amenity space and connections for drainage, electricity and water.
- i) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.
- j) Conserve and, where possible, enhance the setting of Grade II Listed Horton Farm House.
- k) Ensure the site layout retains and protects veteran trees and maximises retention and safeguarding of other existing mature trees and hedgerows as part of a coherent landscaping strategy for the site.
- l) Achieves a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.

Chapter 5 – Homes for all

Policy S5 – Housing Mix and Type

- 5.1. Providing an appropriate mix of housing types and tenures is a vital part of creating sustainable communities and meeting the diverse needs of all people within the borough. It is important that homes can be adapted for changing needs over time and contribute to improvements. Housing needs have been assessed through the HEDNA.
- 5.2. Household needs within the borough are varied and include requirements for singles, couples, families, the young, older people, as well as a requirement for affordable housing.
- 5.3. Table 5a below sets out the recommended mix of affordable and market homes for future developments in the borough over the Local Plan Period as set out in the HEDNA.

Table S5a: Housing Mix				
Tenure	1-bedroom	2-bedrooms	3-bedrooms	4+ bedrooms
Market	10%	35%	35%	20%
Affordable home ownership	20%	40%	30%	10%
Affordable housing (rented)	40%	35%	20%	5%

- 5.4. Where the housing need evidence for the borough is subsequently updated, the latest evidence should be used to inform housing mix. The mix detailed will not be feasible from all developments sites and it is for this reason that the policy provides flexibility to have regard to the size, characteristics and locations of development sites.

Policy S5: Housing mix and type

Residential development will be permitted where the following criteria are met:

- a) The mix of tenure, type and size reflects housing need, set out in the Housing and Economic Development Needs Assessment (2023) or any subsequent update; and
- b) The housing mix has regard to the size, characteristics and location of the site.

Policy S6 - Affordable Housing

- 5.5. Housing affordability is a significant issue for Epsom and Ewell and is a key priority for the council. To help address the problem of affordability, the council is committed to enabling the provision of affordable housing for local people who cannot meet their housing needs on the open market.
- 5.6. Due to the pressing need for social rented and affordable rented accommodation as identified by the HEDNA and Council's Housing Needs Register, this policy prioritises the delivery of social rented and affordable rented accommodation.

Thresholds and Mix

- 5.7. The Local Plan Viability Assessment identifies that there is variation between the levels of affordable housing that can be delivered from greenfield sites and other sites (generally previously developed land) due to varying land values and, it is for this reason that the policy sets different policy affordable housing thresholds for greenfield sites and urban sites.
- 5.8. In terms of the affordable housing mix, the preferred affordable housing mix is as follows:
- 30% Affordable Home Ownership (preference shared ownership)
 - 70% Affordable Rented (with at least half of the provision to be socially rented)
- 5.9. In terms of the affordable housing mix, it is recognised that there may be circumstances where the above housing mix thresholds may not be able to be met due to site specific circumstances. For example, for purpose built schemes for the elderly (e.g. extra care housing schemes) where affordable housing is required, all affordable units should be provided as affordable rent.
- 5.10. For all affordable rented products, the rent of these properties should not exceed the Local Housing Allowance Rates.
- 5.11. It is strongly recommended that applicants and developers use the council's Pre-application Service as an opportunity to work with the council to understand the affordable housing needs in the borough in greater detail, which will include data from the Council's Housing Needs Register and information provided to the council from registered social housing providers operating in the borough.
- 5.12. The priority for affordable home ownership products will be shared ownership accommodation. However, the council will consider requests from developers to provide first homes as part of the affordable home ownership mix.
- 5.13. Commuted sums will be charged for any fractional number of affordable units to be provided on site equivalent to that part of the residential dwelling.
- 5.14. Affordable homes must be integrated within proposed developments to help build and maintain balanced and mixed communities. However, the feasibility of managing and maintaining the affordable homes will also be given consideration when assessing the acceptability of their siting and distribution.

- 5.15. The council will not accept the subdivision of sites into smaller development parcels that it considers are being partitioned in order to circumvent the affordable housing requirements of this policy, or any other policy requirements within this Local Plan. In determining whether two or more pieces of land in close proximity to each other should be considered as one site, the council will have regard to relevant information about the land, including:
- a) the sites' present and historic land ownership;
 - b) the planning history of the land; and
 - c) whether there is a reasonable prospect of developing both sites together

Viability

- 5.16. The affordable housing requirements of this policy are considered to be achievable. This has been confirmed by the Local Plan viability assessment. Unless there are particular circumstances, there should be no need for a further viability assessment at the decision-making stage. Site promoters will be expected to take account of costs arising from affordable housing and other requirements when negotiating to purchase land for development. The price paid for land is not a justification for failing to comply with the relevant policies in this plan.
- 5.17. Policy S2 Sustainable and Viable development provides further detail on the approach the council will take in cases where development proposals are not fully policy compliant.

Vacant Building Credit

- 5.18. Vacant building credit, as described in national planning guidance, will be applied to developments where a vacant building is either converted or demolished and may result in a reduction in the required affordable housing. The credit does not apply when a building has been abandoned.

Policy S6: Affordable Housing

- 1) The council will require proposals to provide affordable homes on all residential developments comprising self-contained units, as follows:

On greenfield sites

- a) Schemes of 10 or more new units or where the site has an area of 0.5 hectares or more, on-site provision of 40% affordable housing of the gross number of dwellings;

On all other sites

- b) Schemes of 10 or more new dwellings or where the site has an area of 0.5 hectares or more, on-site provision of 30% affordable housing of the gross number of dwellings;

- 2) Where a development meets the criteria detailed in 1), the preferred mix for affordable housing provision on site is as follows:
 - 30% affordable home ownership;
 - 70% affordable rented (with half to be secured as social rented)
- 3) Commuted sums will be charged for any fractional number of affordable units to be provided on site equivalent to that part of the residential dwelling;
- 4) On site affordable housing should be dispersed throughout the site, unless there are specific circumstances or benefits that would warrant a different approach. Market and affordable homes on sites should be indistinguishable and achieve the same high-quality design.
- 5) Affordable housing from proposals of 10 or more units shall be provided on-site. Only where it can be demonstrated that exceptional circumstances exist will provision for off-site provision be allowed or the payment of a financial contribution made (equivalent in value to it being provided on-site).
- 6) Where a site has been sub-divided or is not being developed to its full potential, to circumvent the affordable housing thresholds detailed in criteria 1, the Council will seek a level of affordable housing provision that would have been achieved on the site as a whole had it come forward as a single scheme.
- 7) In accordance with Policy S2, viability will only be considered in exceptional circumstances and where there are significant additional costs not anticipated through the viability evidence that has informed the Local Plan.

Key supporting documents

- Housing and Economic Development Needs Assessment (2023)
- Local Plan Viability Assessment (2023)

Policy DM1 - Residential Space Standards

- 5.19. It is important that new homes are built to a high standard to meet the needs of the borough's residents. New homes should be comfortable, functional and adaptable. They should also minimise the impact they have on the environment, climate change and pressure they put on water supply. As such, this policy should be read in conjunction with policy DM10 Building Efficiency Standards.
- 5.20. New housing should have sufficient internal and external space to cater for a variety of different needs. National space standards set the minimum requirements. However, these standards should be treated as minimum requirements and not targets. The Council will encourage higher standards where possible.
- 5.21. New homes should be designed to be accessible to a diverse range of needs and adaptable to changing needs over time. The HEDNA identifies that there is a growing number of older people in the borough who may have mobility issues, and need greater accessibility and support needs. It is therefore important to plan for these needs.
- 5.22. Building regulations include a mandatory requirement M4(1) Category 1 which sets out minimum access standards. In addition, there are optional requirements for higher access standards: M4(2) Category 2 for accessible and adaptable dwellings and M4(3) Category 3 for wheelchair user dwellings. Within Category 3, there is a differentiation between wheelchair adaptable dwellings (M4(3)(2)(a)) and wheelchair accessible dwellings (M4(3)(2)(b)). Building Regulation M4 (3)(2)(b) 'accessible wheelchair user dwellings' only applies to affordable housing where the Council is responsible for allocating or nominating a person to live in that dwelling.
- 5.23. Meeting Building Regulations requirements M4(2) and M4(3) will normally be controlled through the use of a planning condition. As required by the PPG, site specific circumstances will also be taken into consideration in applying the accessible and adaptable homes requirement.

Policy DM1: Residential Space Standards

Proposals for new residential dwellings development (Use Class C3) will be permitted where:

- a) the internal space complies with or exceeds the nationally described space standards or any future equivalent.
- b) the minimum requirements for private outdoor space as set out below are satisfied:
 - i) a 5 sq m balcony within flatted development accessible from the main habitable room

- ii) a dedicated private garden for houses.
- c) All dwellings will be required to be built to appropriate accessible and adaptable standards to meet Building Regulations Part M4(2), or as subsequently amended, unless it can be demonstrated it would not be possible to do so due to site specific circumstances.
- d) On sites of 10 or more dwellings:
 - i) a minimum of 10% of new market dwellings will be required to meet Building Regulations wheelchair adaptable dwellings standard (M4(3)(2)(a); unless it can be demonstrated it would not be possible to do so due to site-specific circumstances, and
 - ii) a minimum of 20% of new affordable dwellings will be required to meet Building Regulations accessible compliance standard (M4(3)b) unless it can be demonstrated it would not be possible to do so due to site-specific circumstances or the Council's housing register identifies that there is insufficient demand.

Key supporting documents

- [Technical housing standards- nationally described space standards](#)
- [Approved Document M – Access to and use of buildings Volume 1: dwellings](#)

Policy DM2 – Self and Custom Build Policy

- 5.24. The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) requires local authorities to keep a register of those who are seeking to acquire serviced plots of land in their area for self or custom build projects. The Act does not require the Council to provide land for self and custom builders. Instead, it should grant sufficient suitable planning permissions for self or custom builders to match the number of people on the register.
- 5.25. There is currently limited demand for self and custom-built housing in the borough and it is expected that some serviced plots will continue to come forward on small sites, single plots on infill sites and other windfall development sites over the local plan period.
- 5.26. Policy DM2 enables the provision of self-build and custom plots in suitable locations within the borough.
- 5.27. Provision will be proportionate to the level of demand at the time the application is received. When negotiating the level of self and custom housebuilding provision on site, the council will take account of the most up to date evidence contained within the Self-build and Custom Housebuilding Register and will have regard to both development viability and site suitability considerations.
- 5.28. The provision shall be secured through an appropriate legal undertaking which will allow a mechanism for the developer or a third party to provide and facilitate plots.
- 5.29. The marketing of serviced plots shall be carried out in accordance with an agreed marketing strategy. Where plots are marketed for self and custom build purposes and a period of 12 months has elapsed from the point at which 'serviced plots' are available without take-up, then any variation through application or deed of variations for alternative housing or other uses will need to be justified with details that demonstrate a thorough marketing strategy of the plots at an appropriate price has taken place.
- 5.30. The marketing strategy for the self-build and custom build homes should include an active local marketing campaign. An information/marketing pack should also be provided to the Council to be in turn provided to all individuals on the Council's Self-build and Custom Housebuilding Register who have opted to receive such information as evidenced by the register. The plot provider shall notify the Council that the formal 12 month marketing period has begun.

Policy DM2 - Self-Build and Custom Housebuilding

- 1) Proposals for self and custom build housing will be supported in suitable locations within the urban area (as defined on the policies map).
- 2) The Council will seek provision of 5% (rounded to the nearest whole unit) of the total homes as serviced plots or custom build housing on sites proposing 100 or more dwellings, whilst there is an identified need on the Epsom and Ewell Self-Build and Custom building Register housing register, unless:
 - a) The proposed development is located within Epsom Town Centre Boundary (as defined on the policies map), or
 - b) the proposal is for a fully flatted development, or
 - c) site-specific circumstances mean that it will not be possible.
- 3) Self-Build Plots will form part of the market housing element of the scheme, unless they are conditioned to be brought forward as housing that meets the affordable housing definition.

Key supporting document

- Housing and Economic Development Needs Assessment (HEDNA)
- Epsom and Ewell Self-Build and Custom building Register housing register

Policy S7 – Specialist Housing

- 5.31. Some housing may need to be designed for people with specialist needs. This includes older citizens, those with disabilities, the neurodiverse, students or families more suited to multi-generational communal living.
- 5.32. Such accommodation will be positively and proportionately promoted in the borough based on identified need. For example, by 2040 the number of those aged 65 and over in Epsom & Ewell is projected to be 21,107. This represents a 28% increase on 2022 figures, with the expected rate of increase of the 75 or over and 85 or over groups in the population projected to be higher, at 35% and 73% respectively.
- 5.33. Evidence on how this translates to need for the required number of specialist homes or bed spaces for older people varies, notably between figures provided by Surrey County Council (SCC) and the calculations provided by the independent consultants who produced the HEDNA.
- 5.34. SCC predicts an oversupply of market extra care units and a need for 146 affordable extra care units up to 2035, and 355 nursing home beds. The HEDNA suggests that a mid point between the SCC figures and its outputs (which arose due to a difference in prevalence rates) be used as the actual need figure, which is 308 residential units and 180 nursing care beds.
- 5.35. Owing to the specific need for affordable extra care units, all units classified as such will be subject to affordable housing contributions to meet this need, unless there are exceptional circumstances to justify not making such a contribution, or it can be demonstrated that the cost of affordable housing has already been met through some mechanism outside of the planning system. SCC has published Planning guidance for accommodation with care for older people and a supporting Planning Profile for the borough that provides more information regarding need and definitions for affordable accommodation.
- 5.36. The meeting of need for specialist housing will also be met through adapting market homes, for example through the requirements set out in Policy DM1 – Residential Space Standards.
- 5.37. The borough's higher education providers which have expansion plans are expected to generate additional need for purpose-built student accommodation to increase over the Local Plan period. The University for the Creative Arts currently have approximately 1,700 students at the Epsom Campus although there is currently capacity to increase the number of students to approximately 2,000 students, the level of growth is less than what was envisaged at the time the HEDNA was produced.

Policy S7 – Specialist Housing

- 1) Development proposals for specialist accommodation, such as homes for older people, people with disabilities, students or the neurodiverse will be permitted where:
 - a) there is robust evidence to support that it meets an identified need in the borough;
 - b) an appropriate tenure mix is provided (where applicable);
 - c) sites have good access to facilities, services and public transport;
 - d) they will not lead to a concentration of similar uses that would be detrimental to the character and function of an area and/or residential amenity;
 - e) it will not significantly impact on the capacity of public services, including health and social care;
 - f) it can be demonstrated that the development is designed and managed to provide the most appropriate types and levels of support to its target resident;
 - g) it can be demonstrated that revenue funding can be secured to maintain the long-term viability of the scheme; and
 - h) the scheme is supported by the relevant statutory agencies.
- 2) Larger-scale new residential developments (over 200 C3 dwellings) will be required to incorporate specialist accommodation, in line with the above criteria, unless there is reasonable evidence that it is not feasible.
- 3) Proposals that may result in the loss of specialist housing or accommodation will not be considered acceptable unless it can be demonstrated that there is no longer a need for such accommodation in the borough, or equivalent alternative provision is being made available locally through replacement or new facilities.

Key supporting documents

- Housing and Economic Development Needs Assessment (HEDNA)
- Surrey County Council – Planning Guidance for older people’s accommodation with care.
- Surrey County Council - Planning Profile for accommodation with care for older people, Epsom and Ewell 2024

DM3 - Loss of Housing

- 5.38. Limited housing land within the borough means it is important that the existing housing stock is protected. The incremental loss of housing would undermine the provision of new housing to meet the borough's needs. Whilst any loss is important, it is recognised that there may be exceptional circumstances where it may be justified, in these circumstances the loss should be weighed against other planning benefits.
- 5.39. Residential floorspace including dwellings (Use Class C3), residential institutions (Use Class C2), and Houses in Multiple Occupation (Use Class C4) will be retained where possible. The policy sets out where there are exceptional circumstances that might justify their loss.
- 5.40. The loss of Use Class C3 dwellings to alternative residential types will generally be supported provided the new provision meets the identified needs of the borough. The applicant will need to demonstrate there is a need for the use and the proposal does not result in a disproportionate provision of certain types of housing.
- 5.41. The council will consider permitting the loss of residential accommodation to a social or community facility that supports the health and wellbeing of the borough's residents and visitors.
- 5.42. Redevelopment of affordable housing will only be permitted where it is replaced by better quality accommodation providing no net loss of affordable housing, either on site or in an alternative location within the borough. In instances where the affordable housing is to be provided elsewhere within the borough, this will need to be secured before its loss takes place.

Policy DM3 – Loss of Housing

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

Key supporting documents

- Housing and Economic Development Needs Assessment (2023)

Policy S8 - Gypsies, Travellers and Travelling Showpeople

- 5.43. The borough has an established Gypsy and Traveller population and Surrey County Council manages two Gypsy and Traveller sites within the borough, which provide a total of 30 public pitches.
- 5.44. The accommodation needs of the Gypsy and Traveller community will change over time and the Gypsy and Traveller Accommodation Assessment (GTAA) published in 2022 identifies a need for an additional 18 pitches over the Plan Period. The council has a legal responsibility to develop a fair and effective strategy to address these needs.

Meeting need

- 5.45. It is important to protect existing Gypsy and Traveller sites from being developed for alternative uses whilst there is a need for such sites, as currently demonstrated by the GTAA. Policy S8 addresses this, safeguarding the existing sites to ensure provision is maintained.
- 5.46. To help meet the additional need for sites, the council has sought to increase provision over the plan period through the allocation of a minimum of 10 pitches as part of the Horton Farm Allocation (Site Allocation 35).
- 5.47. Further provision of Gypsy and Traveller sites may be achieved on appropriate unallocated land through the planning application process, particularly where households wish to meet direct family need within existing sites or family circumstances change and new households are formed requiring new sites. Policy S8 enables such applications to be assessed on a site-by-site basis and allows suitable sites, which meet the criteria, to be permitted.
- 5.48. Where unmet need for Gypsy and Traveller pitches remains, Policy S8 requires larger unallocated windfall sites to make a contribution towards meeting this need, where appropriate.

Transit accommodation provision

- 5.49. The provision of transit accommodation on well-travelled routes across Surrey, can help reduce incidences of unauthorised encampments. Careful consideration should be given to the location of a transit site to ensure it is on a well-established travelling route. Policy S8 therefore sets the criteria that will be used to determine applications for transit use on unallocated land.

Assessing applications for Gypsy and Traveller provision

- 5.50. It is recognised that there are unlikely to be sites which would meet every one of the criteria detailed in Policy S8. A 'best fit' approach will therefore be adopted.
- 5.51. It is expected that new pitches and plots should have adequate utility services, amenity space and parking, safe turning space and be in areas with reasonable access to schools, health services and local services. The impact of new sites on existing communities and how well proposals can be integrated is an important consideration in the determination of applications for Gypsy and Traveller provision.
- 5.52. Ancillary buildings are often provided on sites, providing facilities such as washrooms and laundry rooms. These must have a linked use to the main function of the land as Gypsy and Traveller accommodation. They are not a requirement on site, and some traveller sites may not include them, with all facilities being provided within a static mobile home. The council will consider proposals for the provision of ancillary buildings to meet the needs of elderly and disabled travellers.
- 5.53. Provision of 'transit' accommodation for friends and family to visit existing gypsy, traveller and travelling showpeople sites should be dealt with using planning conditions specifying the number of days the site can be occupied by more than the allowed number of caravans (which permits visitors and allows attendance at family or community events).
- 5.54. In granting consent for a site, the council will include a condition to secure the sites to remain in use by Gypsies and Travellers or Travelling Showpeople as appropriate, and the number of pitches and/or plots are retained to ensure a supply to meet demand.

Policy S8: Gypsies, Travellers and Travelling Showpeople

Safeguarding existing supply

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

Planning applications

- 2) Development proposals for gypsy and traveller and travelling showpeople accommodation and ancillary buildings, will be permitted where:
 - a) The use of the land is of a scale appropriate to the location;
 - b) the site is capable of being provided with necessary on-site services;
 - c) the site is conveniently located for access to schools, medical services and other community facilities;
 - d) the site has a safe vehicular and pedestrian access from the public highway and adequate provision for parking; turning and safe manoeuvring of vehicles within the site;
 - e) the site provides adequate space for storage, play and residential amenity;
 - f) the site is not enclosed with hard landscaping, high walls or fences, to an extent that suggests deliberate isolation from the community;
 - g) the use of the land will not result in an unacceptable adverse impact upon local amenity, the existing character of the area and the natural and historic environment; and
 - h) ancillary buildings are of an appropriate scale and size.
- 3) Proposals for mixed residential and business activities will be assessed on a site-specific basis, taking the above criteria into account.
- 4) Proposals for transit gypsy and traveller accommodation will be permitted where the proposal:
 - a) complies with the above criteria (except for c);
 - b) can demonstrate it is located on an established travelling route;

- c) provides accommodation available to all members of the Gypsy and Traveller community (i.e. it is not restricted to one family, group of friends or association).
- 5) Any permission granted for a gypsy and traveller and travelling showpeople site will be subject to a condition limiting occupation to gypsies and travellers and travelling showpeople, as appropriate.

Meeting future needs within larger unallocated development sites

- 6) To meet the needs of Gypsy and Traveller households, accommodation will be expected to be provided on development sites of 200 C3 homes or more whilst there remains an identified unmet need within the borough. Where application sites are within Epsom town centre (as defined on the policies map) or the inclusion of Gypsy and Traveller accommodation can be demonstrated to have a significant negative impact on the efficient use of land, provision will not be expected. This will need to be robustly demonstrated.
- 7) The number of pitches and plots required will reflect the level of local need within the borough. However, sites will have a minimum of 3 pitches/plots and should contain the maximum number of pitches/plots that can reasonably be accommodated on the site.

Key supporting documents

- Gypsy and Traveller Accommodation Assessment (2022)
- Housing and Economic Development Needs Assessment (2023)

Chapter 6 – Economy

Policy S9 – Economic Development

- 6.1. At a strategic level, the Local Plan promotes sustainable economic development within the borough and the surrounding region (e.g. the “Gatwick Diamond”). However, for the purposes of this policy, economic development concerns mostly developing employment opportunities and improving prosperity for all in the borough.
- 6.2. In this respect the key objective of the plan will be to make provision for a range of sites to meet the needs of different types of business and tourism, to encourage diversification in the local economy. Such diversification can include adapting to new ways of working, changing demands for services and the night-time economy.

Policy S9: Economic Development

The sustainable growth of the borough’s economy will be promoted to meet the needs of different sectors by:

- 1) Supporting the regeneration of Epsom Town Centre by enabling new and established businesses to grow;
- 2) Safeguarding strategic employment sites and encouraging the regeneration and intensification of land to meet the needs of the economy to support job creation and meet the needs of business;
- 3) Safeguarding land for the horse racing industry to secure the long term sustainability of the sector;
- 4) Supporting the visitor and night time economy;
- 5) Supporting the creative and cultural industries and further and higher education providers;
- 6) Protecting existing cultural venues, facilities and uses where appropriate and supporting the development of new cultural venues in Epsom town centre.

Policy S10 – Retail Hierarchy and Network

- 6.3. The council places great emphasis on promoting competitive and well managed town and local centres, in addition to local parades of shops which are essential to sustainable and thriving communities.
- 6.4. A strong town centre policy enables a full range of town centre uses to be implemented within these sustainable locations but also allows the council to reject proposals that do not add to the vitality and viability of the town centre or which conflict with other policies and objectives. Town centre uses include, retail, leisure, entertainment facilities, intensive sport and recreation uses, offices, arts, culture and tourism development.
- 6.5. The council will support the provision of a diverse range of uses which appeal to a wide range of age and social groups. It is social and cultural experiences which provide reasons to visit our centres. Uses such as restaurants, places of worship, childcare settings, cafés and museums can complement the retail offer of a town.
- 6.6. Ewell Village and Stoneleigh are the borough's local centres. They are the second tier of the hierarchy, being smaller in terms of their size, catchment and range of uses in comparison to Epsom town centre.
- 6.7. Neighbourhood parades are the third tier, serving a smaller catchment and helping to meet the day to day needs of the local communities they serve.
- 6.8. The sequential test requires that main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
- 6.9. It is important to direct town centre uses as defined by the NPPF to the Town and Local Centres (as defined on the Policies Map) in the first instance to maintain their vitality and viability.

Policy S10 – Retail Hierarchy and Network

- 1) To ensure the long-term vitality and viability of the centres, the council will apply a 'town centre first' approach to proposals for retail, leisure and other main town centre uses. Development should be appropriate to the size and function of the centre within which it is to be located. The retail hierarchy includes the defined town and local centres (as shown on the policies map). The wider retail network also includes other retailing locations across our area.
- 2) The overall hierarchy and network is defined as follows:
 - a) **Town Centre:** Epsom Town Centre
 - b) **Local Centres:** Ewell Village and Stoneleigh Centre
 - c) **Neighbourhood Parades:**

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

Key supporting documents

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

Policy DM4 – Primary Shopping Areas and Retail Frontages

- 6.10. Within the Town and Local Centres as defined on the policies map it is important to preserve active frontages, to encourage footfall and help retain the viability of the centres.
- 6.11. Within Epsom Town Centre Commercial, Business and Service Use (Class E of the use classes order) is protected within primary frontages on the ground floor. Within secondary frontages, other supplementary uses such as drinking establishments and hot food takeaways may also be appropriate to contribute to the diverse range of services offered in a town centre, however, the level of existing provision will be considered to avoid over concentration of a specific type of use.
- 6.12. Within the Local Centres a range of Class E uses and other Town Centre Uses will be supported and where the loss of a Class E use is proposed, the proposed use will need to demonstrate that it maintains an active frontage and a range and mix of products and services in the centre and would not harming the vitality and viability of the local centre.
- 6.13. The council is supportive of re-using upper floors for conversion in the Town and Local centres to residential use, so long as this does not impact the viability of the ground floor use.

Policy DM4 – Primary Shopping Areas and Retail Frontages

Epsom Town Centre

- 1) Within Epsom Town Centre the Primary Shopping Area (as defined on the policies map), will remain the focus for retail activity and other town centre uses. Within the Primary Shopping Area:
 - a) Within the primary frontage (as defined on the policies map) at ground floor level development within use class E will normally be permitted;
 - b) Within the secondary frontages (as defined on the Policies Map), at ground floor level development within Use Class will be normally be permitted. Sui Generis uses suited to a town centre, Class F1 and Class F2(b) will normally be permitted unless they result in an over concentration of those uses.
 - c) Within the primary and secondary frontages, the effective and efficient use of upper floors for main town centre uses or residential use, will be supported where it can be demonstrated that the loss of this floor space would not impact the viability of the ground floor use.
- 2) Applications for the loss of Class E floorspace in the Epsom Town Centre Primary frontages will only be supported where it can be demonstrated that:
 - a) There is no reasonable prospect of the site remaining in a Class E use;

- b) Opportunities to reconfigure or reuse the site to retain its current use or another Class E use have been exhausted;
- c) The site has been marketed in accordance with Appendix 5;
- d) The proposed alternative use would not adversely affect the vitality and viability of the town centre.

Stoneleigh and Ewell Local Centers

- 3) Within the Local Centres (as defined on the policies map) the Council will support:
 - a) a range of Use Class E and other appropriate town centre uses.
 - b) Development proposals involving a change of use from Class E will not be permitted unless the alternative use maintains an active frontage and a range and mix of products and services in the centre and would not harming the vitality and viability of the local centre
 - c) the efficient use of upper floors for main town centre uses or residential use where it can be demonstrated that the loss of this floor space would not impact the viability of the ground floor use

Key supporting documents

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

Policy DM5 – Edge of Centre or Out of Centre Proposals

- 6.14. Town and Local Centres are important in meeting the retail and leisure needs of the residents who wish to shop and socialise locally or who are dependent on the facilities that they offer. The retail and leisure services offered play an important role in meeting local day-to-day needs particularly for those groups without access to a private motor vehicle, the elderly and other vulnerable groups.
- 6.15. The purpose of the policy is to protect the viability and vitality of Town and Local Centres by ensuring that they are not undermined by competing uses being located outside of these areas.
- 6.16. The NPPF requires main town centre uses to be located in designated centres, then in an edge of centre location and only if suitable sites are not available should an out of centre site be considered. The sequential test should be applied to applications for all retail or other main town centre uses that are located outside of the designated centres and that are not located on other sites allocated for such uses. The sequential test need not be applied to proposals for retail or main town centre uses located on sites within designated neighbourhood parades (as defined on the policies map), as it is considered such uses are appropriate within these designated areas.
- 6.17. The requirement for sequential tests and impact assessments will help to protect the trading performance, and overall vitality and viability of the borough's designated centres from adverse impacts of new retail and leisure developments in less suitable locations. Testing the impact of development will focus on the impact of the development on in-centre investment and vitality and viability (including trading impact).
- 6.18. In the case of existing retail warehouses that are effectively limited to bulky goods, the council will resist pressures to broaden the range of goods permitted to be sold. This is to protect the vitality and viability of the Town and Local Centres, but it would also help retain the availability of units for bulky goods sales. If proposals come before the council for relaxing the restrictions on the range of goods to be sold, then they should meet the requirements of this policy.

Policy DM5 – Edge of Centre or Out of Centre Proposals

Sequential test

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

Retail Impact Assessment

- 2) Proposals for retail and leisure development over 500sqm gross floorspace which are not within a designated centre and which are not on sites that are allocated for such uses must be accompanied by an impact assessment and will only be permitted if it is demonstrated that it will not cause a significant adverse impact on existing centres.
- 3) Development that fails the sequential approach to development or is likely to have significant adverse impacts will be refused.

Key supporting documents

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

Policy DM6 – Neighbourhood Parades and Isolated Shops

- 6.19. In addition to Epsom town centre and the local centres at Ewell Village and Stoneleigh, the borough is served by several smaller neighbourhood parades (cluster of shops and services) and isolated community shops, which help to support sustainable communities through providing services and facilities that cater for the day to day needs of our residents.
- 6.20. The boundaries of the neighbourhood parades are shown on the Policies Map.
- 6.21. Proposals at the neighbourhood parades which enhance the retail function/provide community uses which help to meet the local community's day to day needs will generally be supported, subject to them being consistent with other Local Plan policies. Sui Generis uses suited in neighbourhood parades will normally be permitted unless they result in an over concentration of those uses.
- 6.22. The reference to isolated shops in policy DM6 relates to the small shops selling essential retail goods that are under 280sqm in size and which are over 1 kilometre from a similar shop. This aligns with the Local Community Use Class (F2(a)) defined in Town and Country Planning (Use Classes) Order 1987 (as amended).
- 6.23. Marketing periods of no less than 12 months will be required when seeking to demonstrate that the existing use is no longer viable. Further details on marketing requirements are contained in Appendix 5.

Policy DM6 – Neighbourhood Parades and Isolated Shops

- 1) Within the neighbourhood parades, development proposals will be permitted providing they satisfy all of the following criteria:
 - a) they are appropriate to the scale and function of the parade
 - b) they maintain or enhance the vitality and viability of the parade
 - c) if at ground floor level:
 - i) they provide an active frontage, such as a shop front or window display, which is in keeping with the character of the centre/parade;
 - ii) they would contribute to range of retail service and community uses which provide for the day to day needs of local people; and
 - iii) The proposal does not result in an over concentration of a particular use.

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- 2) Residential development at first floor level or above will be supported, subject to having safe and convenient access and not inhibiting the functioning or viability of the ground floor use.
 - 3) The loss of main town centre uses at ground floor to other uses, will only be permitted where it can be demonstrated that the existing use is no longer viable. Such proposals must meet the above criteria and be supported by evidence that demonstrates active and appropriate marketing for a period of at least 12 months.
 - 4) Proposals to change the use of isolated shops will only be permitted where the unit has been vacant and there is evidence to demonstrate active and appropriate marketing for a period of at least 12 months
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Policy DM7 – Employment Land

- 6.24. The borough’s employment sites make a valuable contribution towards supporting economic growth within the borough and wider sub region. There are a wide range of these employment sites dispersed within the borough’s urban area, with concentrations of office accommodation in Epsom Town Centre and the Local Centres.
- 6.25. Kiln Lane and Longmead Industrial Estates are our two largest employment sites, providing approximately 55ha of employment land between them. Although the majority of uses at the site are industrial, warehousing & storage and distribution, they also accommodate some office uses. In addition, there are non-traditional employment uses established at the site that fall within the Sui Generis use class, including vehicle sales and repairs, builders' merchants and trade counters.
- 6.26. The HEDNA recommends securing warehousing and general industrial floorspace supply in key industrial estates of the borough and ensuring the appropriate type and size office accommodation is provided (generally smaller serviced office accommodation. This is to meet future needs for employment floorspace over the Local Plan Period.
- 6.27. To help support a prosperous economy, the policy designates Kiln Lane and Longmead Industrial Estates as strategic employment sites (as defined on the policies map) which provides the highest degree of protection and actively encourages the development, regeneration and intensification of these sites to provide modern floorspace for employment generating uses.
- 6.28. Employment areas outside of the defined strategic employment sites make a valuable contribution towards the economy of the borough and it is for this reason that the policy includes a criteria-based policy for assessing proposals that would result in the loss of floorspace.
- 6.29. For the purposes of this Policy Employment generating uses are those that fall within Classes B2 (industrial and manufacturing), B8 (storage and distribution) and E (g) (commercial, business and service) of the Use Classes order and Sui Generis uses that do not fall within the aforementioned use classes but have similar accommodation and location requirements, such as trade counters.
- 6.30. For employment sites not designated as Strategic Employment Sites:
- Demonstrating that There Are No Strong Economic Reasons to retain the employment use
- i) Whether the proposals would harm the businesses currently established at the site (for example, by requiring them to relocate prior to the termination of their lease when no suitable alternative accommodation is available in the local area, and it can be demonstrated that the relocation of the business would impact upon its operation and sustainability).

- ii) If the site is occupied, information on the number of businesses occupying the site/premises, the remaining lease length for each of the occupiers, and evidence that suitable alternative accommodation is available to accommodate their needs in the local area.
- iii) Whether the site is suitable for contributing towards meeting the needs for employment land, as identified in the most recent HEDNA; and
- iv) Whether the proposal would undermine the operation of a wider employment area by negatively impacting upon established neighbouring uses.

No reasonable prospect of the site being retained in employment use

- v) Developers will need to demonstrate that they have actively marketed the site for at least 12 months when seeking to demonstrate that there is no reasonable prospect of the site being retained in employment use(s). The required marketing period will depend on the location, use and quality of the unit. Further detail on marketing requirements is contained in Appendix 5.

Policy DM7 – Employment Land

Strategic Employment Sites

- 1) To contribute towards meeting the future economic growth needs of the borough, Kiln Lane Industrial Estate, Longmead Industrial Estate (as defined on the Policies Map) are designated as Strategic Employment Sites, to be afforded the highest protection and safeguarding for Employment Generating Uses.
- 2) The development and intensification of these sites will be supported to provide floorspace for Employment Generating Uses that meets the needs of the market.

Outside of the Strategic Employment sites

- 3) The loss of floorspace occupied by employment-generating uses within the urban area will be permitted where it is demonstrated that:
 - a) There are no strong economic reasons to retain the Employment Use;
 - b) There is no reasonable prospect of the site being retained in employment use; and
 - c) The site is no longer suitable for its existing use or other employment uses.

Key supporting documents

- Housing and Economic Development Needs Assessment (2023)
- Longmead and Kiln Lane Industrial Estates Economic Value Report (2022)

Policy DM8 – Racehorse Training Zone

- 6.31. The borough has a successful racehorse training industry associated with the Epsom Downs Racecourse, a nationally significant sporting venue located within the Green Belt. Surrounding the racecourse itself (as defined on the policies map) are the nationally important racehorse training grounds, which make a positive contribution to the economy and sporting heritage of the area.
- 6.32. There are several racehorse training facilities / stable complexes in the Borough (and neighbouring boroughs) which are well-located to support the ongoing use of the training grounds at Epsom Downs. These sites and their associated training grounds, paddocks and fields are included within the Racehorse Training Zone defined on the Policies Map, within which any development proposals will be considered against, as well as all other relevant policies in the Local Plan.
- 6.33. In the case of development or alterations to training yards, development should be designed in line with the British Horseracing Authority's requirements.
- 6.34. The loss of equestrian facilities within the Racehorse Training Zone is potentially harmful to the ongoing viability of the Epsom Downs as a racehorse training centre, which could in turn undermine its contribution to the economy and sporting heritage of the area and long-term management of its attractive open landscape.
- 6.35. Marketing periods of no less than 18 months will be required by a recognised agent specializing in the racing sector property market. Further details on marketing requirements are contained in Appendix 5.

Policy DM8 – Racehorse Training Industry

- 1) Within the extent of the racecourse, as identified on the Policies Map, development proposals to support the continued use of the site for horse racing purposes will be supported, subject to Green Belt considerations.
- 2) Within the Racehorse Training Zone, identified on the Policies Map:
 - i) Proposals which facilitate the long-term or future use of the site as a racing stable and/or for the racehorse training industry will be supported;
 - ii) Any proposals resulting in the loss of specific facilities which would support the long term or future use of the site as a racing stable will be resisted;
 - iii) The change of use or redevelopment of existing racehorse training for alternate uses not in connection with the horse racing / racehorse training industry will not be permitted unless evidence has been provided that:
 - i) Marketing of the site for the horse racing sector has taken place for a period of at least 18 months, at a reasonable market value with a recognised agent specializing in the racing sector property market; and,
 - ii) Opportunities to reconfigure and reuse or redevelop the site so that it can revert to racehorse training that supports the racehorse training industry in the future have been exhausted.
 - iv) Any proposal, regardless of the type of development, should demonstrate that it will not adversely affect the safety of racehorses travelling between the training grounds and the racing stable yards by virtue of the traffic generation from or the design of the development and provide mitigation where there is an impact.

Key supporting documents

- Housing and Economic Development Needs Assessment (2023)
- Scoping Report on the Racecourse and Equestrian Sector in Epsom and Ewell (2020)

Policy DM9 – Visitor Accommodation

- 6.36. The visitor economy is important to support jobs and the economy in the borough. Therefore, it will be important for Epsom and Ewell to maintain its appeal to visitors. Whilst the borough's attractions tend to generate day-trip visitors, there is a modest demand for additional hotel accommodation within the borough as identified in the Surrey Hotel Future Study.
- 6.37. The size of the borough and pressure from alternative uses means it is unlikely that large sites suitable for new visitor accommodation will be regularly available. It is important that visitor accommodation that contributes to the economic vitality of the borough is protected, and the loss of it should be resisted.
- 6.38. New visitor accommodation will be supported in areas with good access to frequent and direct public transport and amenities in the borough such as identified town or local centres. This will focus development in parts of the borough where access to public transport can be optimised.
- 6.39. The occupation of new tourist accommodation will be restricted using conditions or legal agreements to ensure visitor accommodation is for tourist use and not permanent residential use.
- 6.40. The council will require any loss to be fully justified, with marketing undertaken in accordance for a period of at least 12 months. Further details on marketing requirements are contained in Appendix 5.

Policy DM9 – Visitor Accommodation

- 1) Planning permission will only be granted for the development of visitor accommodation in the following locations: Epsom Town Centre, Local Centres, on sites allocated for that purpose, and in locations where there is frequent and direct public transport to the town centre. This locational requirement does not apply to proposals to refurbish or expand existing sites.
- 2) Proposals for new, refurbished or expanded holiday and other short-stay accommodation must satisfy the following criteria:
 - a) they are acceptable in terms of access, parking, highway safety, traffic generation, pedestrian and cycle movements; and
 - b) there is no loss of residential dwellings; and
 - c) the accommodation will not result in an unacceptable level of noise and disturbance to nearby residents.

- 3) Planning permission will only be granted for proposals that result in the loss of visitor accommodation and other short stay accommodation when any of the following criteria are met:
 - a) no other occupier can be found following a realistic effort to market the premises for a period of at least 12 months, for continued use as visitor accommodation (whether or not of the same form of the existing use); and
 - b) evidence of non-viability is submitted.

Key supporting documents

- Surrey Hotel Futures Study (2015)

Chapter 7 – Built and Natural Environment

Policy S11 – Design

- 7.1. Design is essential to retaining the borough’s distinct sense of place, as stipulated in the plan’s vision and strategic objectives. As well as concerning how development “looks” and achieving “beauty”, design is also a crucial wellbeing, among many determinants of sustainable development, climate change, health and other factors which are important for the borough.
- 7.2. It is therefore very important that the borough encourages the highest standards of design in all new developments, and a design policy is considered a strong foundation on which to do this. Of particular importance is the need for development to make efficient use of land, due to the rich variety of protected land use designations unique to the borough, which are under pressure due to high demand for development. The council considers “efficient use of land” to mean, for major development (as defined by the Town and Country Planning Act etc.) a minimum of:
- 80 dwellings per hectare in Epsom Town Centre (as defined on the policies map)
 - 60 Dwellings per hectare near public transport hubs beyond Epsom Town Centre, and
 - 40 dwellings per hectare in other urban areas.
- 7.3. The council is in a strong position to require good and efficient design from development; market conditions, on which the viability assessment of the plan has been conducted in the context of, are very buoyant in this part of England. Therefore, any proposals not of the standard expected will be required to convincingly demonstrate its particular exceptional circumstances.
- 7.4. This policy complements the National Design Guide and the National Planning Policy Framework, which provides further context and policy steer with regards to the Council’s expectations. It should also be recognised that “good design” is not only the domain of this policy, but complemented by others in this plan, and should not be treated as a policy to be traded-off against. To provide further assistance, the Council may provide further prescriptive guidance by producing its own design codes in the future, with which compliance will be expected.

Policy S11: Design

The design of development of all scales (including extensions, alterations and conversions) should be appropriate in relation to the character, appearance and functioning of the built and natural environment by:

- a) making efficient use of land; and
- b) being of appropriate use, scale, mass, proportion, detailing, material, layout and siting; and
- c) respecting the scale, appearance and location of buildings, spaces and visual amenity of the surrounding area; and
- d) where appropriate, providing well structured, practical and attractive areas of soft landscaping and open space.

Policy S12 – Amenity Protection

- 7.5. The need for development must be balanced with the protection of quality of life. In particular, people living near new development or occupiers of future developments should not be unreasonably impacted by loss of sunlight, daylight, privacy, noise or pollution.
- 7.6. A policy allowing the council to ensure the living conditions of occupiers of future developments and existing neighbouring properties is therefore necessary.
- 7.7. Overlooking from public rights of way, play areas and neighbouring properties should be taken into account in any development proposal. The layout and orientation of buildings should take advantage of sunlight and should not block daylight to habitable rooms, dominate or enclose neighbouring residences. There is an expectation that residential developments will have a separation distance of at least 20m between elevations (rear to rear), unless it can be demonstrated that this would not harm residential amenity.
- 7.8. All developments should also be designed with security in mind, as all users have a right to feel safe.
- 7.9. There are numerous tools available to measure impacts on levels of outlook and daylight, such as those by the Building Research Establishment (BRE), and guidance to ensure that development is secure, such as “Secured by Design”. Evidence will be required to demonstrate this policy as appropriate, taking into consideration the merits of each case.

S12 Amenity Protection

All development should secure the amenities of its future occupants, and protect those amenities enjoyed by nearby and adjacent properties. The design of development, should have regard to:

- a) privacy, daylight, and sunlight; and
- b) noise, vibration, light, heat, smell and airborne emissions consisting of fumes, smoke, soot, ash, dust and grit; and
- c) activity levels and traffic generation; and
- d) security of property and personal safety.

Policy DM10 – Building Emission Standards

- 7.10. The Epsom & Ewell Climate Change Study (2022) identifies that domestic (residential) buildings use of heat and power are together the largest source of carbon emissions in the borough. The study sets out that lower carbon means of heating and powering the building stock (domestic and non-domestic) should be a priority for Epsom & Ewell. This Policy sets out the approach to building emissions standards, drawing on the Study's findings and proposed policy interventions.
- 7.11. Policy DM10 has been developed with the energy hierarchy as its core principle. This means improving fabric standards, energy efficiency and minimising space heating requirements, before installing renewable energy. This is commonly known as the 'fabric first' approach and is cited in the Governments Net Zero Strategy as being key to ensuring the transition to low carbon buildings.
- 7.12. Following this method has multiple benefits: it is in accordance with the Government's 2017 Clean Growth Strategy; it ensures that inefficient buildings are not constructed with renewable energy technology bolted on; and it avoids the construction of homes that require retrofitting in the future.
- 7.13. The Council will require planning applications to be supported by an energy assessment to demonstrate how the requirements of the policy will be satisfied.

Policy DM10 Building Emissions Standards

- 1) All proposals should embed the Energy Hierarchy within the design of buildings by prioritising fabric first, orientation and landscaping in order to minimise energy demand for heating, lighting and cooling.
- 2) All proposals should consider opportunities to provide solar PV and energy storage.
- 3) Residential development will be required to achieve Net Zero Carbon, demonstrated through the submission of an appropriate energy assessment that demonstrates how the proposal will achieve:
 - a) Space heating demand less than 30kWh/m²/annum
 - b) Total energy use less than 40kWh/m²/annum; and
 - c) On-site renewable energy generation to match the total energy use, with a preference for roof mounted solar PV.

- 4) Where the use of on-site renewables to match total energy consumption is demonstrated to be not technically feasible (for example with taller flatted buildings) or economically viable, renewable energy generation should be maximised as much as possible; and/or connection to an existing or proposed district energy network.
- 5) All non-residential development must achieve a minimum of BREEAM 'Excellent' UK New Construction standard or equivalent, or any equivalent new standard. This standard should be achieved through increasing energy efficiency of the proposed buildings, and/or the provision of on-site renewable and low-carbon technologies.

Key supporting documents

- Emerging Surrey County Council Net Zero Carbon Toolkit
- Epsom and Ewell Climate Change Study (2023)
- Local Plan Viability Assessment

Policy DM11 – Sustainable Water Use

- 7.14. The entire central-southern part of England is classed as water stressed, and this situation is set to worsen significantly due to climate change, with an increasing reliance on major infrastructure to store and transport water from parts of the country that are not water stressed.
- 7.15. The Epsom & Ewell Climate Change Study (2023) identifies reduced summer precipitation as a risk that is likely to increase the frequency of periods of droughts leading to water scarcity, with the south-east of England most likely to be severely affected. This has the potential to lead to interruptions of household water supplies and associated health impacts.
- 7.16. The study sets out that increasing the efficiency of water demand and use in the home will have adaptation benefits, and cross-cutting benefits with reducing greenhouse gases resulting from domestic water use. The policy interventions proposed within the study have informed Policy DM11.
- 7.17. The policy requires that new dwellings meet the tighter Building Regulations optional water efficiency requirement of 110 litres per person per day, this is a continuation of current policy in the borough.
- 7.18. The storage and use of rainwater is expected from new developments for non-potable uses is expected from all developments, unless it can be demonstrated that for the development proposed that this would not be feasible.

Policy DM11: Sustainable Water Use

- 1) All new homes are required to meet the water efficiency standard of a maximum of 110 litres per person per day, to be achieved through compliance with the Building Regulations.
- 2) New non-residential development of 1,000 sq. m. gross external area (GEA) or more will provide evidence on completion, through the submission of a post construction BREEAM certificate, of achievement of the BREEAM 'excellent' standard for water consumption (or any national equivalent).
- 3) All new developments are expected to incorporate measures for the storage and use of rainwater (greywater recycling) for non-potable uses unless it can be demonstrated that this is not feasible.

Policy DM12 – Health Impact Assessments

- 7.19. The built and natural environment is a key determinant of our health and wellbeing. Healthy built environments encourage and support good physical and mental health, and also help to reduce health inequalities.
- 7.20. A Health Impact Assessment (HIA) helps ensure that health and wellbeing are being properly considered in planning policies and proposals. Where relevant individual applications for new development will be expected to provide a proportionate Health Impact Assessment.
- 7.21. As a minimum, the assessment should include the following:
- a) a description of the physical characteristics of the proposed development site and surrounding area, including the current use; and
 - b) identification of relevant population groups that could be affected by the development and associated health issues, inequalities and priorities in the area, which should be supported with appropriate evidence/data; and
 - c) an assessment of the impacts of the proposal on the identified population groups and local health issues, inequalities and priorities, including any potential positive and negative impacts, along with any mitigation measures incorporated into the design to reduce identified negative outcomes; and
 - d) details of monitoring which will be undertaken in relation to the proposed mitigation to be implemented.
- 7.22. The analysis presented within the HIA should be of a sufficient level of detail to allow the Council to make a clear determination as to impacts the development will have on the health environment.

Policy DM12: Health Impact Assessments

- 1) A Health Impact Assessment should be provided for residential (C3) developments of 100 or more units or schemes providing 50 or more C2 bedspaces.
- 2) A Health Impact Assessment may be required from other major developments where the proposal is likely to have a significant impact on health and wellbeing.

Policy S13 - Preserving identity of place with heritage

- 7.23. The borough has a rich, varied and evolving history, which contributes significantly to its sense of place and identity. Our relationship with history is characterised in no small part by the built environment, particularly by “heritage assets” (as defined by the national planning policy), which also make an essential contribution to the quality of the borough’s townscape.
- 7.24. Importantly, these heritage assets provide context for development, and can collectively act as a useful compass to guide decision making. It is therefore vital that *tangible* and *cultural* heritage assets and their settings are either protected or enhanced, or where necessary, adapted in a sensitive way.

Policy S13 - Preserving identity of place with heritage

- 1) Development will be permitted where as far as possible, it enhances the borough’s cultural, historic, architectural and townscape character.
- 2) The Council will seek to utilise mechanisms available through national policy and legislation, to protect the character of historic places and the significance of designated heritage assets, and uphold the principles upon which such protection has been justified.

Key supporting documents

- National Heritage List for England
- Locally Listed Heritage Assets
- Conservation Area Appraisals
- Historic England Advice Notes
- Local Plan Heritage Topic Paper
- Appendix 6 – Guidance on Proposals Impacting Heritage Assets.

Policy DM13 - Development Impacting Heritage Assets

- 7.25. A heritage asset can be a building, monument, site, place, area (including Conservation Area) or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It can be nationally or locally designated (including locally listed buildings).
- 7.26. The NPPF notes at paragraph 195 that heritage “assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”.
- 7.27. Collectively heritage assets make up the historic environment and so, it is important that any impact on them is considered carefully. The need for development often creates pressure for heritage assets to be adapted or, in extreme cases, removed. It is therefore very important that added weight is given to their conservation and enhancement in any development decision as required by the Planning (Listed Buildings and Conservation Areas Act) 1990 and the Ancient Monuments and Archaeological Areas Act 1979.
- 7.28. Decisions on development impacting heritage assets, including Conservation Areas and Listed Buildings, will be made in accordance with the National Planning Policy Framework or subsequent revision, national Planning Practice Guidance and guidance issued by Historic England.
- 7.29. The Council may produce supplementary planning guidance relating to heritage assets during the lifetime of the Local Plan, which will be afforded proportionate weight in any decision making.
- 7.30. Planning applications for development will be expected to demonstrate how important characteristics or features which contribute to a heritage asset’s significance, special character and setting, will be protected.
- 7.31. For development in and surrounding Conservation Areas, special attention should be paid to local distinctiveness for which that Conservation Area was designated.
- 7.32. For developments impacting Listed Buildings, applications will be expected to include information as necessary to determine the extent of impact on the historic fabric and / or special character of that building.
- 7.33. In addition to demonstrating these considerations through plans, applications will be expected to be accompanied by a Heritage Statement or equivalent, as stipulated in the Council’s validation requirements for planning applications.

- 7.34. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, applicants will be required to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 7.35. The level of detail required to demonstrate the impact of a development on any heritage asset shall be at the discretion of the Council, taking into consideration National Policy and Guidance and the Council's own planning application validation requirements. For further information see Appendix 5, guidance on proposals impacting Heritage Assets.

Policy DM13: Development Impacting Heritage Assets

- 1) Development proposals which have an impact on heritage assets will be permitted where they preserve or enhance them, their significance and/or their setting; or
- 2) Where proposals which impact but do not preserve and/or enhance heritage assets, clear and convincing justification of that impact will need to be provided, in accordance with the decision-making approach directed by the National Planning Policy Framework, Planning Practice Guidance or relevant revision.

Key supporting documents

- National Heritage List for England
- Historic Environment Record
- Locally Listed Heritage Assets
- Conservation Area Appraisals
- Historic England Advice Notes
- Local Plan Heritage Topic Paper

Policy DM14 - Shopfronts

- 7.36. Shopfronts form an essential part of the character and attractiveness of Epsom Town Centre, Ewell Village and other shopping areas in the borough and contribute to the creation of vibrant streets and public spaces.
- 7.37. The design of new shopfronts and other commercial signage should demonstrate respect for the architecture, features and character of the buildings within the area. Design should accord with the council's guidance for shopfronts: 'Shopfront Design Guide' or any future revisions to this document'. The council will resist the removal of shopfronts of architectural or historic interest.
- 7.38. The council will exercise control over the number, design and siting of advertisements and hoardings to ensure the character and amenity of individual buildings and streets are not materially harmed, having regard to the interests of amenity and public safety (including highway safety) in exercising its powers under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended).

Policy DM14: Shopfronts

- 1) The design of new shopfronts and other commercial signage and the re-design of existing shopfronts and commercial signage should demonstrate:
 - a) respect for the architecture and features of the buildings in or on which they are set and the character of the area;
 - b) public safety would not be prejudiced;
 - c) visual pollution and clutter are avoided;
 - d) the proposal will provide an 'active street front'.
- 2) Shopfront Design should accord with the Council's guidance for shopfronts: '[Shopfront Design Guide](#)' or any future revisions to this document.
- 3) The Council will resist the removal of shopfronts of architectural or historic interest.
- 4) The Council will control the number, design and siting of advertisements and hoardings to ensure the character and amenity of individual buildings and streets are not materially harmed, having regard to the interests of amenity and public safety (including highway safety).

Policy DM15 – Green Belt

7.39. Approximately 40% of Epsom and Ewell is Green Belt; land designated under a national policy designed to restrict the urban sprawl from London. The Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

7.40. National policy defines what is inappropriate and what exceptions to this definition exist, and should be read in conjunction with this policy. It also defines what is not inappropriate development. This policy aligns with the NPPF definitions and exceptions but adds the following detailed definitions to them:

Extensions or alterations

- a) The “original building” shall mean either:
 - i) the building as it existed on 1 July 1948; or
 - ii) if no building existed on 1 July 1948, then the first building as it was originally built after this date.

Replacement buildings

- b) A new building will only constitute a “replacement” if it is sited on or in a position that substantially overlaps that of the original building, unless it can be clearly demonstrated that an alternative position would not increase the overall impact on the openness of the Green Belt.

Policy DM15 – Green Belt

- 1) Development in the Green Belt will be considered inappropriate, and will not be permitted unless:
 - a) The development itself is an exception to the definition of “inappropriate” as defined by the National Planning Policy Framework; or
 - b) There are very special circumstances to justify the inappropriate development.
- 2) Very special circumstances are circumstances where other considerations clearly outweigh the harm to the Green Belt as a result of the development.

Policy DM16 – Landscape Character

- 7.41. The borough has an attractive urban and rural landscape. The topography of the borough is noticeably varied, rising to a higher elevation at the Epsom Downs to the south from which there are particularly special views. Some of the borough is designated an Area of Great Landscape Value (AGLV) by the Town and Country Planning Act, because of its particular scenic value. The north and central core are more urban in character but include natural/ semi-natural open spaces, such as Nonsuch Park, Epsom Common and Horton County Park.
- 7.42. These landscapes make an integral contribution to the borough's unique character and sense of place. In addition to their aesthetic value, they are important to health, culture and the economy, playing a central role in attracting visitors.
- 7.43. These landscapes are vulnerable to the impact of development both large scale (such as housing and industrial) and small scale (such as development required for agricultural purposes or equestrian paraphernalia). It is therefore important that rather than having an adverse effect, new developments complement and enhance the landscape. This is particularly important where proposals are located on the edge of built-up areas, open spaces, or in the vicinity of heritage assets.
- 7.44. To aid understanding about what the borough thinks is important to its landscapes, applicants are advised to read the Environmental Character Study (2008) and the Surrey County Council Landscape Character Assessment (2015).
- 7.45. Applicants must demonstrate that their proposals are appropriate in the context of the surrounding character. Development proposals should be accompanied by an appropriate landscape assessment carried out in accordance with guidance from the Landscape Institute and IEMA. Depending on the scale and nature of the proposals this will either be a formal Landscape and Visual Impact Assessment (LVIA) or Landscape and Visual Appraisal (LVA). Regardless of the scale of the assessment, it should address both the potential landscape effects and also the potential visual effects that may result from the development. Detailed development proposals will then be expected to respond positively to this assessment to ensure they conserve and enhance landscape character by strengthening a sense of place.

Policy DM16 – Landscape Character

- 1) Development proposals will be permitted where:
 - a) landscape led approach has been adopted which protects and enhances the character and distinctiveness of landscapes using the most up-to date landscape studies
 - b) the valued characteristics, features and quality of local landscape character area set out in the Landscape Character Assessment or other relevant assessments, have informed the proposed development;
 - c) Development proposals are accompanied by a landscape and visual impact assessment. The level of information provided should be proportionate to the scale and nature of the development proposed and should be sufficient to allow an informed assessment of the potential landscape and visual effects of the proposed development.

Key supporting documents

- Environmental Character Study (2008)
- Surrey County Council Landscape Character Assessment (2015)
- Technical Guidance Note 1.-20 Reviewing Landscape and Visual Impact Assessments (LVIA) and Landscape and Visual Appraisals (LVAs) (2020)
- Landscape Institute - Guidelines for Landscape and Visual Impact Assessment (GLVIA3) (2013)

Policy S14 – Biodiversity and Geodiversity

- 7.46. Planning policies should contribute to and enhance the natural environment by minimising impacts on and providing net gains for biodiversity.
- 7.47. The borough contains nationally and locally designated sites important for their biodiversity value. Other sites, both individually and collectively, that are not designated can contribute towards protecting and enhancing the diversity of species locally.
- 7.48. The weight to be attributed to the protection of nature conservation interest will be commensurate to their significance. The council will apply a hierarchical approach to the conservation of designated sites within the borough as follows:
1. National Sites: Sites of Special Scientific Interest (SSSI) and National Nature Reserves.
 2. Irreplaceable Habitats: habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace, taking into account their age, uniqueness, species diversity or rarity.
 3. Local Sites: Sites of Nature Conservation Importance (SNCI) and Local Nature Reserves.
- 7.49. The Surrey Nature Partnership has identified areas called Biodiversity Opportunity Areas (BOAs) based on broad habitat types with the aim of protecting and enhancing the county's biodiversity on a landscape scale. The borough falls into three Surrey BOAs; notably Thames Basin Lowlands (TBL04), North Downs (ND04) and River Biodiversity Opportunity Area (R01). Surrey County Council are preparing a Local Nature Recovery Strategy LNRS for the County with the support from the individual local authorities. The LNRS will identify priority areas for nature recovery and will take into account BOAs when preparing the Strategy.
- 7.50. The council recognises the opportunities to encourage biodiversity that can be provided through the development of sites. These include providing, retaining and enhancing wildlife corridors and incorporating opportunities within construction methods, such as green roofs, and the provision of suitable appropriate native species in landscaping.

Policy S14 – Biodiversity and Geodiversity

- 1) Development proposals will be permitted where they do not have an adverse impact on biodiversity, or geodiversity. Where harm or loss cannot be avoided, mitigation will be required such that it can robustly demonstrate that:
 - a) there will be no adverse effect on the integrity of international, national and local designated sites;
 - b) there will be no adverse impact on the conservation status of priority species;
 - c) there will be no loss or deterioration of a priority habitat type, and/or irreplaceable habitat;
 - d) the mitigation measures make a specific and positive contribution towards conservation objectives of Biodiversity Opportunity Areas or area identified as a priority for nature recovery in the emerging Local Nature Recovery Strategy LNRS (if located within such area); and
 - e) there will be no adverse effect on the integrity of linkages between designated sites and priority habitats.

- 2) The weight attributed to the protection of nature conservation interests will be commensurate to their status and significance, and any other designation applying to the site, habitat or species concerned. For proposals that affect nationally protected sites, it must be robustly demonstrated that the benefits of the development proposal clearly outweigh the loss or harm and that appropriate compensation will be sought.

- 3) Effective avoidance, mitigation and compensation will be secured through the imposition of planning conditions or planning obligations as appropriate, including monitoring for the effectiveness of these measures.

Key supporting documents

- Epsom and Ewell Biodiversity Action Plan (2020-2030)
- Emerging Local Nature Recovery Strategy

Policy S15 - Biodiversity Net Gain

- 7.51. Biodiversity Net Gain (BNG) is an approach that leaves the natural environment in a better state than it started. The Environment Act 2021 introduced a mandatory requirement for development to achieve a minimum level of BNG compared to its baseline value in order to help address any further degradation of the natural environment.
- 7.52. In Surrey, the State of Surrey's Nature document found higher rates of loss or extinction of species in Surrey was greater than national levels. In addition, historic habitat loss and fragmentation, intensification of agriculture and eutrophication of soils and water are having negative impacts on biodiversity in Surrey. This is in the context of a high natural capital of Surrey's natural assets.
- 7.53. This policy will require at least 10% BNG on qualifying development proposals and 20% BNG from greenfield site allocations, this higher requirement is detailed in the site allocation policy.
- 7.54. To measure biodiversity value and the required output the Statutory biodiversity metric (or up to date equivalent) must be used for major development. For development of 9 dwellings or less, the Small Sites Metric SSM (or up to date its equivalent) can be used to calculate net gain for small development sites.
- 7.55. Planning applications, other than those exemptions specified in the regulations must be accompanied by a Biodiversity Statement containing the minimum information specified in the regulations.
- 7.56. To implement the general biodiversity gain condition, a Biodiversity Gain Plan demonstrating a biodiversity net gain of at least 10% (or the higher 20% requirement for specific site allocations) must be approved before development commences on a site. BNG will be provided either on site, off site or through statutory biodiversity credits in line with the BNG hierarchy.
- 7.57. Biodiversity net gain will be secured by planning condition, legal agreement or a conservation covenant, for a period of at least 30 years after completion of the development.

Policy S15 – Biodiversity Net Gain

- 1) Planning applications, other than those are exempt in accordance with the regulations, will be permitted provided that it can be demonstrated that at least 10% biodiversity net gain can be achieved (unless a higher requirement has been specified in a site allocation policy).
- 2) Biodiversity net gain should be delivered using the following hierarchy:
 - a) On site as part of the development;
 - b) Where on site delivery is not feasible then this should be provided on land adjacent to, or as close to the development site as possible;
 - c) As a last resort, if it can be demonstrated that neither of these options are either available or economically feasible, net gain should be secured on land within the borough boundary. BNG offsets should align with and deliver the LNRS and preferably within BOAs.
- 3) Biodiversity net gain will be secured by planning condition, legal agreement or a conservation covenant, as appropriate.

Key supporting documents

- Surrey Nature Partnership, [Recommendation for the adoption of 20% minimum BNG](#)
- Statutory biodiversity Metric: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>
- Small sites metric: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>
- Statutory biodiversity credits <https://www.gov.uk/guidance/buy-statutory-biodiversity-credits>

Policy DM17 – Trees, Woodlands and Hedgerows

- 7.58. Trees and woodlands together with other key ‘green infrastructure’, such as hedgerows, chalk grassland, meadows, heathland and wetlands provide valuable contributions to the borough. Trees provide enormous benefits for health and wellbeing, enhancing connectedness between people and nature. Trees also provide important contributions to the environment being havens for biodiversity and are important to the character and visual amenity of the borough’s landscapes and urban areas.
- 7.59. In addition to the trees in parks, fields, woodlands, residential gardens and along verges and roadsides, the borough also has veteran trees, areas of ancient woodland and many trees are also protected by Tree Preservation Orders.
- 7.60. The policy supports proposals that retain and enhance existing woodlands, trees and hedgerows and protects ancient woodland, ancient or veteran trees.
- 7.61. Proposals that involve the loss of trees, hedgerows or other landscape features, must be accompanied by an assessment of the significance of the trees and the potential degree of harm and how this will be mitigated. During construction works, existing trees and their root systems will need to be protected, prior to, during and after the construction period.
- 7.62. Where trees are introduced within new development, applicants will need to work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users. Where specific on or off-site planting proposals are required as part of the overall enhancement of a particular development site, the replacement, protection and long-term maintenance of trees, shrubs and other natural features will be specified by condition.
- 7.63. Trees protected by Tree Preservation Orders (TPOs) need permission from the council before any works are carried out on them. When considering applications for the felling or surgery to trees protected by a TPO or trees in conservation areas, account will be taken of the health and stability of the trees, their public amenity value and overriding practical problems that may be caused by retaining them. Where felling is unavoidable, replacement native planting will be required unless there are exceptional circumstances. Unauthorised works to protected trees can result in prosecution.
- 7.64. Where exceptional circumstances of national importance would result in the loss or harm to ancient woodland, ancient or veteran trees; trees protected by Tree Preservation Order (TPO) or trees within Conservation Areas, planting of native species will be preferred in these areas consistent with the advice of the council’s tree officers.

Policy DM17 – Trees, Woodlands and Hedgerows

Development proposals will be permitted where:

- a) they do not result in the loss of, or damage to, trees, woodlands and hedgerows that make a significant contribution to the character or amenities of an area, unless the benefits would clearly outweigh the loss and equivalent replacement planting is provided.
- b) they do not result in the loss of or damage to ancient woodland, ancient or veteran trees or trees protected by Tree Preservation Order (TPO) unless there are exceptional circumstances and appropriate planting to mitigate the loss in biodiversity and natural asset is proposed.
- c) they make provision for street trees and trees within public open space (subject to site suitability) with sufficient space provided for the trees to grow to maturity, both above and below ground.

Policy S16 - Flood Risk and Sustainable Drainage

- 7.65. Flooding is an increasingly important concern for the Borough and our partners, including Surrey County Council (the lead Local Flood Authority). However, mitigating flood risk must be balanced against the need for growth. Therefore, the borough has undertaken an updated Strategic Flood Risk Assessment (SFRA) so that decisions about flood mitigation and development can be made based on the most robust evidence. The SFRA identifies areas of fluvial (river), pluvial (surface water or SFW) and groundwater flood risk in the borough, informed by a suite of national and local evidence, including Environment Agency (EA) data and the borough's own Surface Water Management Plan (SWMP) 2011. The SFRA also includes detailed guidance about how flood risk should be approached on an application-by-application basis, and should therefore be read in conjunction with this policy.
- 7.66. Whilst the thresholds for flood zones and how different types of development should be approached are defined at a national level, the council has discretion as to the interpretation of "flood zone 3b". It has taken a precautionary approach and set a high bar by defining flood zone 3b as areas with a 1 in 20 year fluvial flood risk or 5 % Annual Exceedance Probability (AEP), which is also as consistent as possible with most other Local Planning Authorities in Surrey.
- 7.67. Areas susceptible to Surface Water Flooding (SFW) are identified within the SFRA and not included within the flood zone thresholds, but will trigger the need for a site specific Flood Risk Assessment (FRA). It should be noted that areas of Surface Water Flooding are defined with the Surface Water Management Plan (2011) as "Critical Drainage Areas" (CDAs). These are not the same as the national designations of the same name defined by the Environment Agency, and should not be conflated.
- 7.68. In recognition of the heightened challenge faced by flooding, the Council has also heeded EA advice that development should be located 8m away from river banks. However, requirements under Biodiversity Net Gain Requirements may necessitate further set-backs and should be considered in parallel to this policy requirement.
- 7.69. The SFRA has been used to inform the Local Plan's Spatial Strategy, and identified available sites considered otherwise suitable (as defined by the NPPF) for allocation, by assessing them in more detail (known as a "Level 2" assessment). Together, the level 1 and level 2 SFRA have informed the "Sequential Assessment," the methodology for which is described in National Policy and Guidance, to inform how sites are allocated in the plan with minimal flood risk.
- 7.70. The Level 2 assessment also provides further bespoke guidance for each allocated site as to whether further a site specific Flood Risk Assessment (FRA) will be required on application, as well information about the FRA should be conducted.

Policy S16: Flood Risk and Sustainable Drainage

Development will be permitted where:

- a) It demonstrates compliance with guidance set out in the Epsom and Ewell Borough Council Strategic Flood Risk Assessment 2024 (SFRA) and associated central Government policy and Guidance.
- b) Where necessary (as defined by Government Policy and Guidance), sequential and subsequent exception tests have been passed.
- c) In the case of proposals in flood zone 2, 3a, 3b, sites greater than 1ha in flood zone 1, with an otherwise identified flood risk, or areas susceptible to Surface Water Flooding (as identified in the SFRA maps), the planning application(s) have been accompanied by a Flood Risk Assessment.
- d) It is set back a minimum of 8 metres from riverbanks and/or existing flood defence infrastructure (measured from the top of the riverbank at the point at which the bank meets the level of surrounding land).
- e) Finished floor levels are set 300mm above the climate change flood level (as defined in the SFRA).
- f) It would not increase the risk of flooding to the site or its neighbours or mitigation measures to alleviate such risks (such as Sustainable Drainage Systems, Nature Based solutions or Natural Flood Management) will be implemented.
- g) Any increase in built footprint within the fluvial Flood Zone 3a (inclusive of the climate change flood extent) is compensated for from a flood storage perspective on a level for level, volume for volume basis.
- h) It does not result in the culverting of main rivers.
- i) It will result in the de-culverting of main river channels where applicable, subject to demonstrating that flood risk will not be increased elsewhere.

Key supporting documents

- Strategic Flood Risk Assessment – Level 1 2024
- Surface Water Management Plan 2011
- Epsom and Ewell Climate Change Action Plan 2020.
- Flood Risk Regulations 2009
- Flood Water Management Act 2010
- National and Coastal Erosion Risk Management Strategy 2020

- EA FCERM Roadmap to 2026
- UK Environment Act 2021
- UK Climate Change Adaptation Policy 2021
- UK Climate Risk Assessment 2022
- Surrey County Council Preliminary Flood Risk Assessment 2011
- Surrey Local Flood Risk Management Strategy 2017
- Planning Practice Guidance – Flood Risk and Coastal Change 2022
- National Planning Policy Framework
- Thames Catchment Flood Management Plan 2009
- Thames River Basin District Flood Risk Management Plan 2022
- Surrey County Council Sustainable Drainage System Design Guidance

Policy DM18 - Pollution and Contamination

- 7.71. Pollution and contamination manifest themselves through various pathways including (but not limited) to; noise, air, water, light and soil. For example, Ewell High Street is a local hotspot for nitrogen dioxide pollution arising from road transport. There are also localised areas of contaminated land within the borough. Such pollution is detrimental to the health and wellbeing of people and the environment and therefore the Council is committed to reducing it.
- 7.72. Development has the potential to mitigate or exacerbate pollution and contamination depending on how it is managed. It is therefore very important that development is managed in such a way that it does not exacerbate pollution of contamination and where possible, reduces it.
- 7.73. Though one policy, it differentiates between pollutant/contaminant pathways and should be interpreted accordingly. This policy should also be read in conjunction with relevant national policy, legislation and guidance.

Policy DM18 Pollution and Contamination

A. Soil Waste/Contaminated Land

Where development is proposed on land known, or likely to be contaminated or affected by adjacent or related contamination, it will be permitted only when:

- i) A detailed technical assessment to assess the nature of the contamination has been undertaken (taking care to avoid the escape of contaminants); and
- ii) the land can be made safe for the proposed use for the entirety of its lifetime, before the development is occupied;

B. Water Quality

New development will be permitted where:

- i) It includes suitable arrangements for the disposal of foul water into a sewerage system at the nearest point of adequate capacity; and
- ii) It does not deteriorate the local water environment; or
- iii) It includes well designed mitigation measures to ensure the local water environment does not deteriorate, both during construction and the lifetime of the development.

C. Air Quality

All development proposals will be permitted where:

- i) Their emissions will be as low as practicable; or
- ii) appropriate mitigation measures are put in place to reduce impacts to acceptable levels; and
- iii) they are designed to minimise the occupants' or users' exposure to air pollution, both internally and externally within areas of poor air quality (as defined by the presence of Air Quality Management Areas)

D. Noise and Vibration

Development will be permitted where;

- i) The application for development can demonstrate it will not generate or (as the agent of change) expose itself to unacceptable noise or vibration; or
- ii) Where unacceptable noise and vibration is likely to occur, it incorporates attenuation measures to bring noise and vibration to acceptable levels.

E. Light

Development including lighting will be permitted where the lighting is the minimum necessary for security, safety or working purposes, and will not impact on amenity as a result of glare or spillage, particularly in residential areas, areas of biodiversity interest, or the highway.

F. Odour

All development proposals for new residential development must consider odour, fumes and dust emitted from existing land uses and implement appropriate mitigation to protect the amenity of future occupiers.

New developments that will generate odour or fumes, must be carefully designed to include on site mitigation and actively minimise impacts on neighbouring land uses.

Chapter 8 – Infrastructure

Policy S17 – Infrastructure Delivery

- 8.1. Infrastructure includes a wide range of services and facilities which is necessary to support development and sustain thriving communities. Such infrastructure includes, but is not limited to:
- Transport provision, including roads, bus and rail networks, walking and cycling.
 - Utilities and physical infrastructure such as water supply and sewerage treatment, gas and electricity, telecommunications, waste management and disposal, and flood risk management.
 - Education provision, including early years (ages 0-5 years), primary and secondary education, post 16 education/training and SEND provision.
 - Health facilities including primary health infrastructure such as GP surgeries and dental practices, and acute care facilities.
 - Social and community infrastructure such as community centres, libraries, sports/leisure facilities and theatres.
 - Green and blue infrastructure such as parks & gardens and natural/semi natural areas.
- 8.2. Specific policies elsewhere in this Local Plan deal with some of these forms of infrastructure in more detail.
- 8.3. Existing infrastructure can help to meet the needs of new development where there is spare capacity or opportunities to share facilities. However, to ensure adequate levels of infrastructure are maintained to serve our communities and the economy, new development must mitigate its effects and provide new or improved infrastructure where required.
- 8.4. New or improved infrastructure must be delivered and/or upgraded in a timely manner to meet the needs of new development. Developers, particularly of larger schemes, are encouraged to engage with the council and infrastructure providers at an early stage in the planning process to ensure this can be achieved. For new development, the provision of or funding towards new infrastructure will be secured through planning obligations (S106) and/or the Community Infrastructure Levy (CIL).
- 8.5. Proposals which result in the loss of infrastructure will be resisted unless a suitable alternative is provided, or it can be demonstrated there is no longer a need for it. Developers must provide evidence to this effect that consultation with an appropriate range of service providers and the community has taken place.

- 8.6. The council maintains an Infrastructure Delivery Plan (IDP) to assess the types, quantities, and locations of the existing infrastructure provision and that which is needed to meet future needs. This has helped to inform policies within this Local Plan. The council will continue to work in partnership with infrastructure providers and delivery agencies to ensure the IP is regularly updated.
- 8.7. The delivery of infrastructure will be funded through a combination of mechanisms, which will include the use of Community Infrastructure Levy (CIL) funds. The council annually publishes an Infrastructure Funding Statement that sets out the CIL and S106 funds that have been received and how such funds have been spent and are likely to be spent in future years.

Policy S17 Infrastructure Delivery

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

Key supporting documents

- Epsom and Ewell Infrastructure Delivery Plan

Policy S18 – Green and Blue Infrastructure

- 8.8. Green and blue infrastructure includes individual natural components that are connected into network fulfilling multi-functional roles with multiple benefits to the local community, economy and environment. Green features may include (but is not limited to) open space, parks, public and private gardens, woodlands, playing fields, allotment, trees, green roofs/walls and blue features may include rivers, streams, green and sustainable drainage systems.
- 8.9. An integrated green and blue infrastructure network can encourage inward investment, help to improve mental and physical health and wellbeing, enhance biodiversity, and assist with climate change mitigation and adaptation.
- 8.10. The council, in partnership with other organisations, will plan for a network of accessible and integrated green infrastructure across the borough and linked to adjoining areas and will strengthen the role of its green infrastructure network over the lifetime of the Local Plan.

Policy S18 – Green and Blue Infrastructure

1. Development will be supported provided that:

- a) it protects and enhances the integrity, quality, connectivity and multi-functionality of the existing green and blue infrastructure network and individual sites and components of the network;
- b) it enhances green and blue infrastructure, through provision of appropriate green or blue features within the network;
- c) any adverse impacts on the green infrastructure network are fully mitigated through the provision of green infrastructure on site or, where feasible, through appropriate off-site compensatory measures; and
- d) where new green infrastructure is provided within new development, suitable arrangements are in place for its future funding, maintenance and management. This could be through seeking contributions from developers or through a site management company, where appropriate.

2. Development proposals that would result in the loss or harm of green and blue infrastructure will only be supported if an appropriate replacement is provided that is of equivalent or better value in terms of quantity, quality, and accessibility.

Supporting Documents

- Surrey County Council Green and blue Infrastructure: best practice case studies

Policy DM19 – Open Space, Sport and Recreation

- 8.11. This policy covers formal and informal open spaces, outdoor and indoor sports/recreational facilities, allotments and equipped areas of play.
- 8.12. Open spaces often have a multi-functional role, providing a range of leisure and recreational opportunities, making a valuable contribution to health and wellbeing, being havens for biodiversity, and helping to alleviate and mitigate against the impacts of climate change. Open spaces also play a key role in flood risk management and are key elements to developing successful SUDS.
- 8.13. The council's evidence base studies have found that generally there is a good range of accessible public open space, sports facilities and playing pitches within the borough. These are greatly valued by residents and attract many users from beyond the borough's boundaries. The studies have also found that there is a need for new/improved public open space provision in certain areas of the borough and there is demand for additional sporting facilities.
- 8.14. The purpose of this policy is to ensure that the range and quality of open space, sport and recreation provision is maintained and improved where needs are identified, to ensure it meets the needs of the communities they serve.
- 8.15. Existing open space, sport and recreational buildings and land, including playing fields, will be safeguarded in accordance with national policy. The general expectation will be that proposals affecting this type of existing infrastructure will include provision for equivalent or better-quality provision. Open spaces designated as Local Green Space (as defined on the Policies Map) have the greatest protection and will be afforded the same level of protection consistent with areas within the Green Belt.
- 8.16. All new development is expected to contribute towards the provision (and where appropriate, maintenance) of infrastructure, which includes open spaces, sports and recreational facilities.
- 8.17. On site provision of open space should be made in accordance with the Fields in Trust benchmark standard set out below (or any future equivalent standard). However, the council will negotiate on a site-by-site basis the type of open space provision where other typologies may be more appropriate or desirable having regard to the most up to date Open Space Audit:
- For parks & gardens: 0.8 ha per 1,000 people
 - For amenity green space: 0.6 ha per 1,000 people

- For equipped/designated play space:

Scale of Development	Local Area for Play (LAP)	Locally Equipped Area for Play (LEAP)	Neighbourhood Equipped Area for Play (NEAP)	Multi Use Games Area (MUGA)
5+ dwellings (net)	Yes			
50+ dwellings (net)	Yes	Yes		
220+ dwellings (net)	Yes	Yes	Yes	
500+ dwellings (net)	Yes	Yes	Yes	Yes

8.18. Past development trends within the borough have shown that many of the windfall sites are expected to continue. It is therefore assumed that in most cases, such sites will be expected to mitigate their impact upon open space, sport and recreation facilities through the Community Infrastructure Levy.

8.19. However, on larger sites and/or in areas where there is an identified deficit/need for this type of infrastructure, there may be a requirement for on-site provision. For allocated sites, this requirement is addressed within the allocation policy where relevant. Developers are therefore encouraged to discuss their proposals with the council at an early stage.

Policy DM19 – Open Space, Sport and Recreation

- 1) Proposals which complement and enhance the value and use of open spaces for recreation, biodiversity and/or nature conservation and climate change adaptation/mitigation will be considered favourably.
- 2) Proposals for new and improved, refurbished, replacement or extended indoor and built sport and recreational facilities must be of high quality and optimise accessibility to all users.
- 3) All development which would result in a net increase in residential units will be required to contribute towards open space, sport and recreation provision. This will either be through financial contributions via the community infrastructure levy, or on-site provision. Where a development is required to make on-site provision, this must be an integral part of the development and have in place appropriate long term stewardship arrangements to secure the quality of the open space in perpetuity.
- 4) Development proposals that would result in a net increase in the number of residential units are required to provide open space in accordance with the Fields in Trust benchmark standard (or any future equivalent standard), however the council will negotiate on a site-by-site basis the type of open space provision where other typologies may be more appropriate or desirable having regard to the most up to date Open Space Audit.

- 5) Proposals which result in a loss of open space and/or sport and recreational buildings/land will only be considered where supported by robust evidence and will be assessed in line with national policy.
- 6) Areas designated as Local Green Space (as defined on the policies map) will be safeguarded from development other than in very special circumstances where the potential harm to the Local Green Space and the purposes of including land within it is clearly outweighed by other considerations. Any proposed improvements or enhancements which involve development will be assessed in accordance with national policy on proposals affecting the Green Belt.

Supporting Documents

- Open Space Audit (2024)
- Playing Pitch Strategy (2021)
- Sports Facilities Assessment (2020)

Policy DM20 – Community and Cultural Facilities

- 8.20. Community and cultural facilities play a vital role in supporting social well being in the borough and it is therefore important that there are sufficient facilities to meet the needs of communities both now and in the future. Community and cultural facilities include uses such as community halls, theatres, places of worship, schools, education facilities, GPs or health centres, dentists, libraries, civic centres, indoor and outdoor sports facilities, and public houses.
- 8.21. The council will continue to work closely with its partners and service providers to ensure the borough’s needs can be met. This will be informed by the council’s Infrastructure Delivery Plan.
- 8.22. New provision should be located in sustainable locations, ensuring good accessibility by a wide range of travel modes.
- 8.23. The council will require any loss to be fully justified, with marketing undertaken in accordance with the requirements of Appendix 5.
- 8.24. It is important to maximise the use of existing facilities given the limited land availability for new facilities. The council will support proposals for facilities or “hubs” that accommodate a mix of community uses to enable the most efficient use spaces/facilities.

Policy DM20 – Community and Cultural Facilities

- 1) Planning permission will be permitted for new or extensions to existing community and cultural facilities provided that:
 - a) there is a demonstrable identified need;
 - b) it is in a location that is well served by public transport and accessible by walking and cycling; and
 - c) it is delivered in flexible and adaptable building/s which could accommodate other social infrastructure uses where practicable, to encourage efficient use of land through mixed use and increased public access.
- 2) The council will only support the loss of existing community and cultural facilities where:

- a) the proposal is supported by clear and robust evidence that demonstrates that the facility is no longer needed or no longer economically viable to retain in the existing use; and
- b) it has been vacant and actively marketed for a community use without success for at least 18 months; or
- a) it can be re-provided to an equivalent standard elsewhere within the borough or provision can be delivered in a different way.

Key supporting documents

- Epsom and Ewell Infrastructure Delivery Plan

Policy DM21 – Education Infrastructure

- 8.25. For its size, the borough contains a wide range of education infrastructure ranging from early years providers, primary and secondary schools in both the public and private sectors to further and higher education facilities.
- 8.26. It is home to three further and higher education campuses, notably the University for the Creative Arts, North East Surrey College of Technology (NESCOT) and Laine Theatre Arts, in addition to 6th form facilities at schools that play a valuable role in supporting the social fabric and economic success of the borough and its residents.
- 8.27. Education establishments often provide a range of educational, recreational and sporting facilities which can be used to meet a variety of needs not only for pupils, but for local communities.
- 8.28. The council will support investment in the existing educational infrastructure to ensure facilities continue to support changing needs and demands.
- 8.29. The Council also wishes to encourage such facilities to be available for use by the wider community wherever possible, to improve access to sporting activities and other community-based activities. For example, our evidence has shown that there is a need for additional playing pitches and sports halls which could partly be met by utilising existing or new educational infrastructure.

Policy DM21 – Education Infrastructure

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

Key supporting documents

- Epsom and Ewell Infrastructure Delivery Plan

Policy S19 – Transport

- 8.30. As the borough develops and changes, the transport network will need to support future growth and changes and therefore will be an important consideration when planning development.
- 8.31. Development will have an impact on the existing transport network therefore will need to be appropriately located in relation to highways, public transport networks, provide parking in accordance with our Parking Standards and facilitate use of sustainable modes of transport.
- 8.32. Surrey County Council is the Highway Authority and has published the Surrey Local Transport Plan 4 which provides the long-term framework for transport policies for the area. It seeks to significantly reduce carbon emissions from transport and reduce use of the private car to meet the commitment of net zero emissions by 2050 and address congestion.
- 8.33. The Epsom Town Centre Masterplan (2024) and Epsom and Ewell Local Cycling and Walking Infrastructure Plan (2024) identify potential interventions on the highway network to improve accessibility and connectivity by sustainable and active travel modes.
- 8.34. It is essential that new development can be appropriately serviced, which includes the provision of appropriate waste and recycling storage areas and accessible collection points for refuse vehicles.
- 8.35. The policy sets out the thresholds for when development will be required to submit a Transport Assessment and Travel Plan. These documents set out the potential transport impacts of the proposals, how these will be addressed and how sustainable travel will be delivered in the long term. There may be occasions where smaller developments have lower impacts and therefore a Transport Statement may be necessary unless it can be demonstrated to the satisfaction of the council that the changes are minor.
- 8.36. Prospective developers are encouraged to engage with the council and Surrey County Council at the pre-application stage in order to ensure the successful integration of development proposals to the wider transport network.
- 8.37. As the local transport authority, Surrey County Council will be consulted on transport matters at the planning application stage, developers are advised to refer to the county council's Transportation Development Planning: Good Practice Guide (2020) for further information required for the development.

Policy S19 – Transport

- 1) To ensure the delivery of a sustainable transport network, new development in the borough will:
 - a) need to be well designed to promote, safe accessibility and movement which prioritise the access needs of pedestrians and cyclists, protecting and enhancing pedestrian and cycle access routes;
 - b) improve existing walking and cycling routes to local facilities, services, bus stops and railway stations;
 - c) where appropriate and practicable, provide on-site facilities for cyclists, including showers, lockers and secure, convenient cycle parking (in accordance with the standards detailed in Appendix 4);
 - d) meet the council's parking standards with consideration given to highway safety and congestion;
 - e) consider establishing car clubs and cycle rental schemes or other similar sustainable transport schemes;
 - f) provide facilities situated in convenient and easy to use locations that will increase the uptake of electric and other zero emission vehicles; and
 - g) provide appropriate servicing to the site, including waste and recycling storage areas and accessible collection points for refuse vehicles.
- 2) Where any new development would generate a significant number of trips by users of the development (these would include but are not limited to development of educational establishments, large business premises or residential developments of 50 homes or more) the council will require:
 - a) planning applications to be accompanied by a Transport Assessment; and
 - b) developers to develop, implement and keep up to date a proportionate, robust and effective on-site plan associated with the development which contains measures to reduce car use and promote sustainable transport modes car use and promote sustainable transport modes.
- 3) Car free development will be encouraged in appropriate locations and where supported by evidence demonstrating that proposals would not lead to parking stress.

Key supporting documents

- Surrey Local Transport Plan 4 (2022)
- Epsom Town Centre Masterplan (2024)
- Epsom and Ewell Local Cycling and Walking Infrastructure Plan (2024)
- Surrey County Council - Transportation Development Planning: Good Practice Guide (2020)

Policy DM22 – Aerodrome Safeguarding

- 8.38. Aerodrome safeguarding is a legal requirement to ensure the safe operation of aerodromes, such as Heathrow and Gatwick Airport, is taken into account in the design of development. Aerodrome safeguarding considerations cover a number of aspects including tall structures, wind turbines and green infrastructure.
- 8.39. Where required, the Council will consult with the airport operator and/or the operator of technical sites (e.g. radar stations) on relevant proposals within the aerodrome safeguarded areas. Statutory consultation responses may require that restrictions are placed on the height or detailed design of buildings, structures and other developments to avoid impacts on the aerodrome, including those relating to navigational aids and Instrument Flight Procedures. Proposals that cannot be mitigated to the satisfaction of the statutory consultees may be a hazard to aircraft safety and will not accord with Policy DM22.
- 8.40. The aerodrome safeguarding area extends to cover a zone broadly within 30km of the airports, covering much of the borough. The borough is also within the 30km wind turbine notification area. More information is available on the airports website, and applicants are encouraged to consult the technical aerodrome safeguarding advice notes or liaise directly with the airport operator for advice on proposed developments.

Policy DM22 – Aerodrome Safeguarding

- 1) Development should have regard to aerodrome safeguarding requirements and will only be supported if it is consistent with the continued safe operation of airports.

Policy DM23 – Digital Infrastructure and Communications

- 8.41. Good telecommunications, and the infrastructure that it requires, is an essential part of modern day living and supports economic growth. However, poorly designed and poorly sited equipment can have a detrimental impact on the character and appearance of a building and the wider area.
- 8.42. Over the plan period, the use and demand of digital connections in homes and businesses will continue to grow. It is therefore important that new developments must be 'futureproofed' with appropriate digital infrastructure that will meet existing and future communication needs. It is essential that the council works with developers and digital infrastructure providers to make sure that the appropriate digital infrastructure is incorporated into new developments.
- 8.43. To improve quality of life, support and facilitate home working, support local businesses and education providers and enable access to digital services, the council will require that developments comprising new homes and/or commercial development, are provided with the most up to date digital connections unless for technical or viability reasons it can be demonstrated that this is not achievable.
- 8.44. This policy provides clear assessment criteria and guidance to applicants about the considerations to be considered when planning for future telecommunications and utilities equipment.

Policy DM23 – Digital Infrastructure and Communications

Planning permission for telecommunications development will be permitted where it can be demonstrated that:

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

Chapter 9 – Implementation and Monitoring

Implementation

- 9.1. The policies and allocations in the Local Plan will largely be delivered through the Council's role as Local Planning Authority through the determination of planning applications.
- 9.2. The granting of planning permission for developments that comply with the policies in the Local Plan, and the requirements of any planning conditions or planning obligations, will ensure that development is consistent with the overall Local Plan Vision and Objectives.
- 9.3. However, this process will be undertaken in partnership with others including developers and landowners and statutory consultees as well as other stakeholders. The Council as landowner will also have a role in implementing policies and allocations set out within the Local Plan.

Monitoring

- 9.4. It is essential that the policies in this Local Plan are monitored so that early action can be taken to overcome any barriers to the delivery of the Plan.
- 9.5. Monitoring is also important to enable communities and interested parties to be aware of progress and ensure that the overall development plan strategy is being delivered.
- 9.6. The Council produces an annual Authority Monitoring Report (AMR) which includes information on how Local Plan policies are being delivered, this will include the number of homes and amount of employment and retail space that have been delivered during the monitoring year
- 9.7. A Monitoring Framework is set out in the Monitoring Framework section below. Monitoring will only apply to planning applications determined after the adoption of the Local Plan.

Review

- 9.8. The Council has a requirement to review the Local Plan every five years, annual monitoring will help to identify whether there is a need to review policies in advance of this period. Other factors might also require the Council to review the Local Plan including, significant changes to national planning policy, guidance or legislation.

Policy S1 – Spatial Strategy

Indicators	Annual Target / Plan Period Target	Data source
Net additional dwelling completions	Annual target – average of at least 261 dpa in line with current trajectory. Plan target – delivery of at least 4,700 dwellings over the plan period (2022-2040)	Planning decisions and appeals Monitoring data
Annual delivery of Gypsy pitches permitted and completed	18 pitches over the Local Plan period (as per need identified in the GTAA)	Planning decisions and appeals Monitoring data
The amount of net employment floorspace permitted and completed each year	Assess trends against identified needs in the HEDNA	Planning decisions and appeals Monitoring data
The amount of net retail floorspace permitted and completed each year	Assess trends against identified needs in the retail study	Planning decisions and appeals Monitoring data

Policy S2 – Sustainable and Viable Development

Indicators	Annual Target / Plan Period Target	Data source
Number of planning applications refused	n/a	Planning applications and appeals
Number of planning applications permitted that do not fully comply with policy requirements following a viability review.	n/a	Planning applications and appeals

Policy S3 – Climate Change and Mitigation

Indicators	Annual Target / Plan Period Target	Data source
Number of residential schemes that comply that do not comply with the policy requirements	n/a	Planning decisions and appeals

Policy S4 – Epsom Town Centre

Indicators	Annual Target / Plan Period Target	Data source
Regeneration of 13 strategic allocations in the town centre	Delivery of sites over Local Plan period in accordance with the trajectory.	Planning decisions and appeals Monitoring data

Site Allocations – SA1 to SA35

Indicators	Annual Target / Plan Period Target	Data source
Delivery of sites	To deliver sites over the Local Plan period in accordance with the trajectory.	Planning appeals and decisions Monitoring data

Policy S5 – Housing Mix and Type

Indicators	Annual Target / Plan Period Target	Data source
Annual housing mix delivery (and cumulatively over the plan period) for market housing	Approximate proportions: 1 bed – 10% 2 bed – 35% 3 bed – 35% 4 bed – 20%	Planning decisions and appeals Monitoring data
Annual housing mix delivery (and cumulatively over the plan period) for affordable home ownership	Approximate proportions: 1 bed – 20% 2 bed – 40% 3 bed – 30% 4 bed – 10%	Planning decisions and appeals Monitoring data
Annual housing mix delivery (and cumulatively over the plan period) for affordable housing (rented)	Approximate proportions: 1 bed – 10% 2 bed – 35% 3 bed – 35% 4 bed – 20%	Planning decisions and appeals Monitoring data

Policy S6: Affordable Housing

Indicators	Annual Target / Plan Period Target	Data source
Number of affordable dwellings granted consent	Approx 1,250 over Local Plan period.	Planning decisions and appeals
Number of planning decisions including appeals allowing a lower level of affordable provision than set out in the policy.	n/a	Planning decisions and appeals

Number of affordable home completions (and as a % of total net completions)	n/a	Planning decisions and appeals
Number of households on the Housing Register	Assess trends	Housing register

Policy DM1: Residential Space Standards

Indicators	Annual Target / Plan Period Target	Data source
Number of schemes for residential development that do not satisfy the policy requirements	100% new homes meet the Nationally Described Space Standard	Planning appeals and decisions

Policy DM2 – Self and Custom Build Policy

Indicators	Annual Target / Plan Period Target	Data source
Number of self and custom build dwellings permitted and completed each year	Demand for self-build as indicated by the self-build register.	Completions, planning decisions and appeals Self and custom build register.

Policy S7 – Specialist Housing

Indicators	Annual Target / Plan Period Target	Data source
Number of planning decisions including appeals allowing specialist accommodation	In line with site allocations and all other proposals consistent with the requirements of policy S7.	Planning appeals and decisions
Number of specialist dwellings lost	No net loss of plan period.	Planning appeals and decisions
Number of additional specialist dwellings and bedrooms	n/a	Completions, planning appeals and decisions

DM3: Loss of Housing

Indicators	Annual Target / Plan Period Target	Data source
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Gains/losses of C3 dwelling-houses/C2 and C4	No net loss of housing over local plan period.	Planning appeals and decisions
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Policy S8: Gypsies, Travellers and Travelling Showpeople

Indicators	Annual Target / Plan Period Target	Data source
Number of pitches permitted via planning decisions including appeals	18 gypsy pitches over the plan period	Planning decisions and appeals
Number of pitches lost via planning decisions including appeals	No net loss of pitches over the plan period	Planning appeals and decisions

Policy S9 – Economic Development

Indicators	Annual Target / Plan Period Target	Data source
Loss of floorspace in economic use at the Strategic Employment Sites	No net loss over plan period.	Planning decisions and appeals
Loss of floorspace in economic use outside of the Strategic Employment Sites	Assess trends	Planning decisions and appeals

Policy S10 – Retail Hierarchy and Network

Indicators	Annual Target / Plan Period Target	Data source
Number of planning decisions including appeals allowing main town centre uses outside of the centres	Assess trends	Planning decisions and appeals

Policy DM4 – Primary Shopping Areas and Retail Frontages

Indicators	Annual Target / Plan Period Target	Data source
Planning permissions approved in the town centre for appropriate town centre uses (as defined in the NPPF)	Assess trends	Planning decisions and appeals

Policy DM5 – Edge of Centre or Out of Centre Proposals

Indicators	Annual Target / Plan Period Target	Data source
Number of planning decisions including appeals allowing main town centre uses outside of the centres	Assess trends	Planning decisions and appeals

Policy DM6 – Neighbourhood Parades and Isolated Shops

Indicators	Annual Target / Plan Period Target	Data source
Number of planning decisions including appeals allowing appropriate uses within the neighbourhood parade	Assess trends	Planning decisions and appeals

Policy DM7 – Employment Land

Indicators	Annual Target / Plan Period Target	Data source
Annual commercial, business and service (Class E) floorspace change (and cumulatively over the plan period)	Assess trends	Monitoring data

Policy DM8 – Racehorse Training Zone

Indicators	Annual Target / Plan Period Target	Data source
Loss of land to non-equestrian uses in the defined Racecourse Training Zone	No loss of land to non-racehorse training uses in the Racecourse Training Zone	Planning decisions and appeals

Policy DM9 – Visitor Accommodation

Indicators	Annual Target / Plan Period Target	Data source
Planning permissions or appeals granted for visitor accommodation (number of units and bedspaces)	Assess trends	Planning decisions and appeals
Planning permissions or appeals granted for the loss of visitor accommodation (number of units and bedspaces)	Assess trends	Planning decisions and appeals

Policy S11 – Design

Indicators	Annual Target / Plan Period Target	Data source
Planning permissions refused based on the policy	Assess trends	Planning decisions and appeals

Policy S12 – Amenity Protection

Indicators	Annual Target / Plan Period Target	Data source
Planning permissions refused based on the policy	Assess trends	Planning decisions and appeals

Policy DM10 – Building Emission Standards

Indicators	Annual Target / Plan Period Target	Data source
Planning permissions approved supported by an appropriate Energy Assessment	All relevant planning applications are accompanied by an Energy Assessment.	Planning decisions and appeals

Policy DM11 – Sustainable Water Use

Indicators	Annual Target / Plan Period Target	Data source
Building control applications meeting water efficiency standards	All homes meeting water efficiency standards of 110 litres per person per day All non-residential development of 1,000 sqm GEO or more provide a post-construction BREEAM certificate to a 'excellent' standard All new development incorporating measures for storage and use of rainwater for non-potable uses (unless not feasible)	Building Control Records Planning decisions and appeals

Policy DM12 – Health Impact Assessments

Indicators	Annual Target / Plan Period Target	Data source
Planning permissions inclusion of an impact assessment, if required	All permissions include a health impact assessment, if required	Planning decisions and appeals

Policy S13 - Preserving identity of place with heritage

Indicators	Annual Target / Plan Period Target	Data source
Net gain/loss of listed buildings	No loss of designated heritage assets.	Planning decisions and appeals
Number of listed buildings at risk	No increase in number of Listed Buildings identified as at risk.	Buildings at risk register

Policy DM13 - Development Impacting Heritage Assets

Indicators	Annual Target / Plan Period Target	Data source
Net gain / loss of listed buildings	No loss of designated heritage assets.	Planning decisions and appeals
Number of listed buildings at risk	No increase in number of Listed Buildings identified as at risk.	Buildings at risk register
Conservation Areas identified as at risk.	No increase in number of Conservation Areas identified as at risk.	Historic England records

Policy DM15 – Green Belt

Indicators	Annual Target / Plan Period Target	Data source
Number of planning decisions, including appeals, granting permission for inappropriate development in the Green Belt, where very special circumstances that outweigh harm have not otherwise been identified	Assess trends	Planning appeals and decisions

Policy S14 – Biodiversity and Geodiversity

Indicators	Annual Target / Plan Period Target	Data source
Condition status of SSSIs	Improvements to condition of SSSIs in line with targets in Local Nature Recovery Strategy.	Site surveys
Condition status of SNCIs	Improvement in condition status	Surveys and DEFRA returns

Policy S15 - Biodiversity Net Gain

Indicators	Annual Target / Plan Period Target	Data source
Percentage of major planning applications delivering at least 10% biodiversity net gain	All qualifying development obligated to achieving at least 10% biodiversity net gain or 20% where specified in a site allocation policy.	Planning decisions and appeals

Policy DM17 – Trees, Woodlands and Hedgerows

Indicators	Annual Target / Plan Period Target	Data source
New development proposals including landscape plans	All relevant planning applications to include appropriate landscape plans	Planning decisions and appeals

Policy S16: Flood Risk and Sustainable Drainage

Indicators	Annual Target / Plan Period Target	Data source
Number of planning permissions granted contrary to Environment Agency advice on flooding and water grounds	Number of planning applications permitted or appeals allowed contrary to advice of the Environment Agency	Planning decisions and appeals

Policy DM18: Pollution and Contamination

Indicators	Annual Target / Plan Period Target	Data source
Number of planning decisions including appeals allowing development that is not in accordance with this	Number of relevant planning applications that are not in accordance with the policy	Planning decisions and appeals

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Policy S17 – Infrastructure Delivery

Indicators	Annual Target / Plan Period Target	Data source
Permitted schemes making on-site provision of infrastructure	Additional infrastructure delivered from site allocations	Planning decisions and appeals

Policy S18 – Green and Blue Infrastructure

Indicators	Annual Target / Plan Period Target	Data source
Number of planning decisions including appeals that secure the provision of green infrastructure through new development	Assess trends	Planning decisions and appeals
Number of planning decisions including appeals allowing the loss of existing green infrastructure	No loss of existing green infrastructure	Planning decisions and appeals

Policy DM19 – Open Space, Sport and Recreation

Indicators	Annual Target / Plan Period Target	Data source
Number of planning decisions including appeals allowing losses of open space or sport and recreational buildings/land	No loss of open space or sport and recreational buildings/land	Planning decisions and appeals
Number of planning decisions including appeals which create new or enhance open space or sport and recreational buildings/land	Assess trends	Planning decisions and appeals

Policy DM20 – Community and Cultural Facilities

Indicators	Annual Target / Plan Period Target	Data source
Gains/losses of Use Class F1 and F2 facilities	Assess trends	Planning decisions and appeals
Developer contributions securing social and community infrastructure	Assess trends	Funding and space secured (authority monitoring report)

Policy DM21 – Education Infrastructure

Indicators	Annual Target / Plan Period Target	Data source
Number of planning decisions including appeals allowing additional education floorspace	Assess trends	Planning decisions and appeals

Policy S19 – Transport

Indicators	Annual Target / Plan Period Target	Data source
Percentage of developments supported by a Travel Plan.	100% of qualifying developments	Planning applications, appeal monitoring,
Use of sustainable travel modes	Increase in travel to work Modal share by sustainable travel modes in 2031 Census over 2021 baseline.	Census – every 10 years SCC data on sustainable transport.

Policy DM22 – Aerodrome Safeguarding

Indicators	Annual Target / Plan Period Target	Data source
Number of applications not in line with safeguarding requirements for continued safe operation of Gatwick Airport	No applications in contradiction with safeguarding requirements	Planning decisions and appeals

Policy DM23 – Digital Infrastructure and Communications

Indicators	Annual Target / Plan Period Target	Data source
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Number of planning decisions including appeals allowing new telecommunications and digital infrastructure	Assess trends	Planning decisions and appeals
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Appendix 1: Glossary

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

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

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

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

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

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

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

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

Allocated site: site identified in the Local Plan as being appropriate for a specific land use or land uses in advance of any planning permission.

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

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

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

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

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

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

Biodiversity Net Gain (BNG): Approach to development that seeks to leave the environment in a measurably better state than beforehand, using a standardised method for quantifying biodiversity which is based on the type and area of habitats present at a site level.

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

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

Building Regulations: Ensures that the policies set out in legislation regarding building standards are carried out. Building Regulations approval is required for most building work in the UK

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

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

Community Facilities: Includes, but is not limited to, facilities such as community centres and other community meeting places, healthcare facilities, education facilities, childcare facilities, public houses, the voluntary sector, public service providers, places of worship and cultural facilities including theatres and arts centres.

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

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

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

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

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

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

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

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

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

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

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

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

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

Employment Uses: Employment Use Classes comprising uses within Classes B2 B2 (industrial and manufacturing), B8 (storage and distribution) and E (g) (commercial, business and service), which cover Industrial, Storage or distribution and Office uses. Sui Generis uses that do not fall within the aforementioned use classes but have similar accommodation and location requirements, such as trade counters.

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

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

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

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

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

Geodiversity: The range of rocks, minerals, fossils, soils and landforms that make up a particular landscape.

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

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

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

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

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

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

Gypsies and Travellers: Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such. Please note: This definition is taken from Planning policy for traveller sites (December 2023).

Gypsy and Traveller Accommodation Assessment: An assessment of need in respect of the Gypsy and Traveller and Travelling Showpeople communities

Health Impact Assessment: A combination of procedures, methods and tools by which a policy, programme or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population.

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

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

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

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

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

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

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

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

Irreplaceable habitat: Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. Examples in the borough are ancient woodland, ancient and veteran trees.

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

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

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

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

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

Local Nature Recovery Strategy (LNRS): A plan to halt and reverse local biodiversity losses, by restoring and reconnecting priority habitats and species at a landscape scale.

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

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

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

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

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

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

Major Development: For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Self-build/Custom Build: Self-Build refers to projects where an individual or an association of individuals directly organises the design and construction of new homes. Custom build refers to

projects where an individual or an association of individuals work with a specialist developer to deliver new homes.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

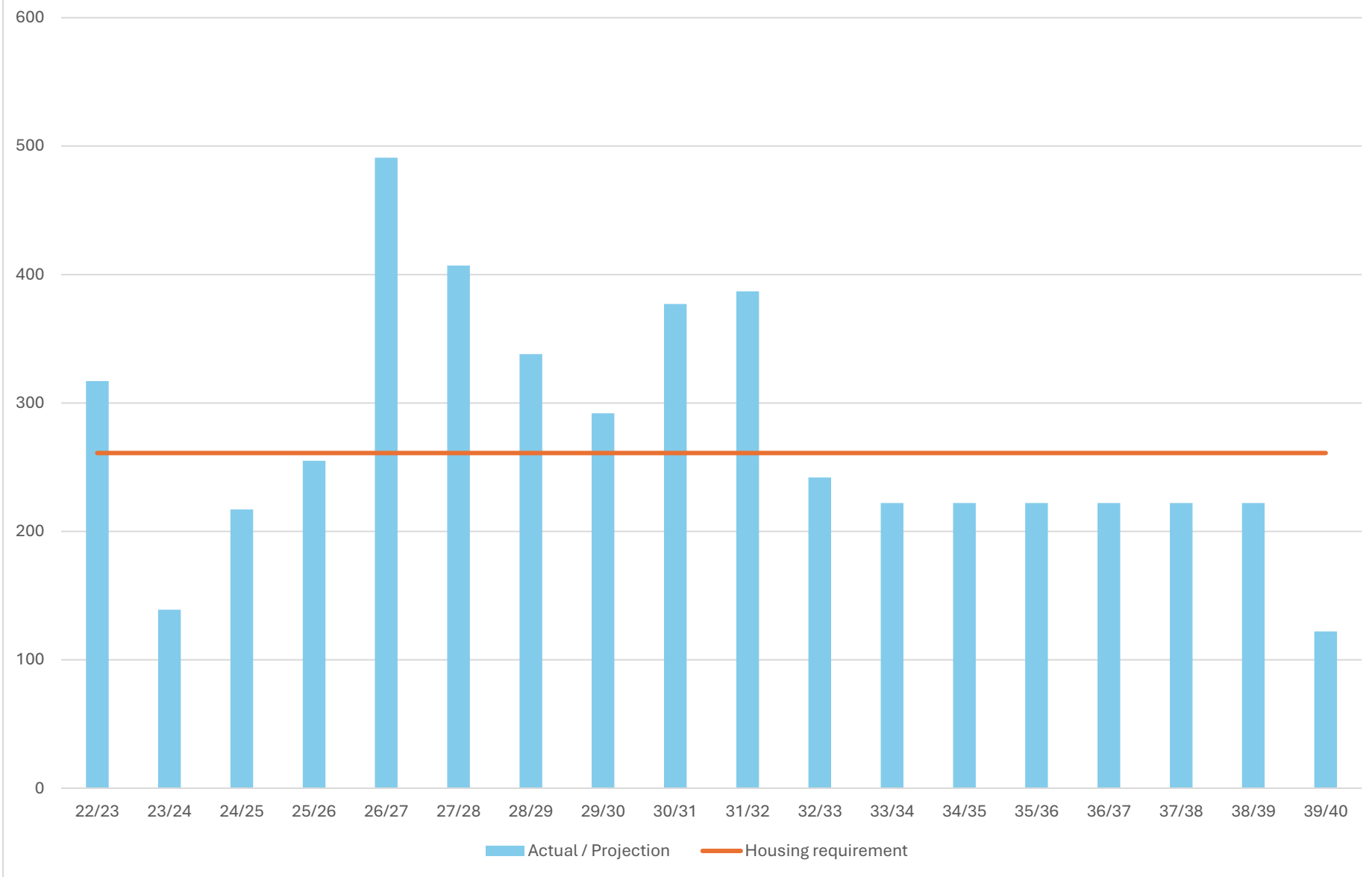
Appendix 2: Housing Trajectory

SOURCE	No. of units	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	TOTAL
Completions (2022-2024)	456	317	139																	456
Commitments (April 2024) – (667, with 10% lapse rate applied = 600)	600			200	200	200														600
Small windfall	455						35	35	35	35	35	35	35	35	35	35	35	35	35	455
Large windfall	407								37	37	37	37	37	37	37	37	37	37	37	407
URBAN SITES (20+ units)																				
SGN Site (SA1)	455					160	200	95												455
Hook Road Car Park (SA2)	150									100	50									150
20 Hook Road, Solis House (SA3)	25							25												25
Bunzl (SA4)	20				20															20
Town Hall (SA5)	90						50	40												90
Hope Lodge (SA6)	25										25									25
Former Police & Ambulance Station (SA7)	47						47													47
Depot Road & Upper High Street Car Parks (SA9)	100									50	50									100
79-85 East Street (SA10)	34						20	14												34
Finachem House, 2-4 Ashley Road (SA11)	21					21														21
Global House (SA12)	100								100											100
Swail House (SA13)	45						45													45
60 East Street (SA14)	30				30															30
Land at Kiln Lane (Wilson Nissan) (SA16)	40								40											40
Hatch Furlong Nursery (SA17)	30							15	15											30
Land rear of Rowe Hall (SA18)	96					96														96
SMALL URBAN SITES (5-19 units)																				
Epsom Clinic (SA8)	15							15												15
Corner of Kiln Lane & East Street (101B East Street) (SA15)	5			5																5
7 Station Approach, Stoneleigh (SA19)	5				5															5
Esso Express, 26 Reigate Road (SA20)	10							10												10
Richards Field Car Park (SA21)	7							7												7
Etwell House, Station Road (SA22)	10						10													10
140-142 Ruxley Lane West Ewell Surrey (SA23)	12			12																12
Garages at Somerset Close & Westmorland Close (SA24)	6					6														6
64 South Street, Epsom (SA25)	6							6												6
35 Alexandra Road (SA26)	8					8														8
22-24 Dorking Road (SA27)	18							18												18
63 Dorking Road (SA28)	8							8												8
GREEN BELT RELEASE																				
Land at West Park Hospital + community hospital (PDL) (SA31 & SA32)	200							50	50	50	50									200
Land at Chantilly Way (SA33)	30								15	15										30
Hook Road Arena (SA34)	100									40	40	20								100
Horton Farm (SA35)	1250									50	100	150	150	150	150	150	150	150	50	1250
Actual / Projection		317	139	217	255	491	407	338	292	377	387	242	222	222	222	222	222	222	122	

4,916

Note – some allocations in the plan are not listed above as they are included in the commitments.

Housing trajectory & requirement



Appendix 3: Development Plan Policies to be superseded by the Local Plan (2022-2024)

The boroughs development plan currently consists of the:

- Epsom and Ewell Core Strategy (2007)
- Plan E – An Area Action Plan for Epsom Town Centre (2011)
- Development Management Policies (2015)

The following tables set out how the policies in the above development plan documents will be replaced by policies in the Epsom and Ewell Local Plan (2022-2040).

Core Strategy Policy	Replacement Policy in Epsom and Ewell Local Plan (2022-2040)
CS1 – Creating Sustainable Communities in the Borough	S2 Sustainable and Viable Development
CS2 – Green Belt	DM15: Green Belt
CS3 - Biodiversity and Designated Nature Conservation Areas	S14: Biodiversity and Geodiversity
CS4 - Open Spaces and Green Infrastructure	DM19: Open Space, Sport and Green Infrastructure / S18 Green and Blue Infrastructure
CS5 – The Built Environment	S13: Preserving identity of place with heritage / DM13 Development Impacting Heritage Assets
CS6 - Sustainability in New Developments	DM10: Building Emission Standards / DM11: Sustainable Water Use
CS7 – Housing Provision	S1: Spatial Strategy
CS8 – Broad Location of Housing Development	S1: Spatial Strategy
CS9 – Affordable Housing	Policy S6: Affordable Housing
CS10 – Gypsies, Traveller and Travelling Showpeople	Policy S8: Gypsies, Travellers and Travelling Showpeople

Core Strategy Policy

CS11 – Employment Provision

CS12 – Meeting Community needs

CS13 - Community, Cultural and Built Sports Facilities

CS14 – Epsom Town Centre

CS15 – Role of Local Centres

CS16 - Managing Transport and Travel

Replacement Policy in Epsom and Ewell Local Plan (2022-2040)

DM7: Employment Land

DM20: Community and Cultural Facilities

DM19 Open Space, Sport and Recreation / DM20: Community and Cultural Facilities

Policy S4: Epsom Town Centre

S10: Retail Hierarchy and Network

S19: Transport

Plan E Policy - An Area Action Plan for Epsom Town Centre

Policy E1 - Town centre boundary

Policy E2 - Housing capacity in the Town Centre

Policy E3 - Town Centre retail capacity

Policy E4 - Town Centre Primary Shopping Area and Primary & Secondary Retail Frontages

Policy E5 - Town Centre employment floorspace provision

Policy E6 - Leisure, cultural and community facilities provision

Policy E7 - Town Centre building height

Policy E8 - Town Centre energy generation

Policy E9 - Public realm

Policy E10 - Improving accessibility and facilities for cyclists

Replacement Policy in Epsom and Ewell Local Plan (2022-2040)

S10: Retail Hierarchy and Network

S11: Design

S1: Spatial Strategy

DM4: Primary Shopping Areas and Retail Frontages

S9: Economic Development

DM20: Community and Cultural Facilities

S11: Design

S4: Epsom Town Centre

S19: Transport

Plan E Policy - An Area Action Plan for Epsom Town Centre

Policy E11 - Deliveries to premises
Policy E12 - Town centre parking
Policy E13 - Changes to the road network
Policy E14 - Depot Road and Upper High Street
Policy E15 - The Utilities Site
Policy E16 - Epsom Station site
Policy E17 – Other Opportunity sites

Replacement Policy in Epsom and Ewell Local Plan (2022-2040)

S19: Transport
Appendix 4: Vehicle Parking Standards
S17: Infrastructure Delivery
SA9: Depot Road and Upper High Street Car Park
SA1: Southern Gas Network Sites
N/A
See other Site Allocations

Development Management Policies (2015)

DM1: Extent of the Green Belt
DM2: Infilling within the Major Developed Site
DM3: Replacement and extensions of buildings in the Green Belt
DM4: Biodiversity and New development
DM5: Trees and Landscape
DM6: Open Space Provision
DM7: Footpath, Cycle and Bridleway Network

Replacement Policy in Epsom and Ewell Local Plan (2022-2040)

DM15: Green Belt
DM15: Green Belt
DM15: Green Belt
S14: Biodiversity and Geodiversity /
S15: Biodiversity Net Gain
DM17: Trees, Woodlands and Hedgerows
DM19: Open Space, Sport and Recreation
S19: Transport

Development Management Policies (2015)

Replacement Policy in Epsom and Ewell Local Plan (2022-2040)

DM8: Heritage Assets

DM13: Development Impacting Heritage Assets

DM9: Townscape Character and Local Distinctiveness

S13: Preserving identity of place with heritage

DM10: Design Requirements for New Developments (including House Extensions)

S12: Amenity Protection

DM11: Housing Density

S11: Design

DM12: Housing Standards

DM1: Residential Space Standards

DM13: Building Heights

S11: Design

DM14: Shopfront Design

DM14: Shopfronts

DM15: Advertisements and Hoardings

DM14: Shopfronts

DM16: Backland Development

DM17: Contaminated Land

DM18: Pollution and Contamination

DM18: Communications Infrastructure

DM23: Digital Infrastructure and Communications

DM19: Development & Flood Risk

S16: Flood Risk and Sustainable Drainage

Policy DM20 was deleted as part of the main modifications to the Plan

n/a

DM21: Meeting Local Housing Needs

S7: Specialist Housing

DM22: Housing Mix

S5: Housing Mix and Type

DM23: Gypsy and Traveller Sites

S6: Gypsies, Travellers and Travelling Showpeople

DM24: Employment Uses Outside of Existing Employment Policy Areas

DM5: Edge of Centre or Out of Centre Proposals

DM25: Development of Employment Premises

DM7: Employment Land

Development Management Policies (2015)

Replacement Policy in Epsom and Ewell Local Plan (2022-2040)

DM26: Equestrian-Related Development in the Green Belt

DM8: Racehorse Training Zone

DM27: Working from Home

DM28: Existing Retail Centres (Outside of Epsom Town Centre)

Policy DM4: Primary Shopping Areas and Retail Frontages

DM29: Major New Retail Developments

DM7: Employment Land

DM30: Existing Out of Centre Retail Facilities

DM7: Employment Land

DM31: Safeguarding Small-Scale Retail Provision

DM6: Neighbourhood Parades and Isolated Shops

DM32: Parking and Servicing at Existing Retail Centres

S19: Transport

DM33: Visitor Accommodation

DM9: Visitor Accommodation

DM34: New Social Infrastructure

DM20: Community and Cultural Facilities

DM35: Transport and New Development

S19: Transport

DM36: Sustainable Transport for New Development

S19: Transport

DM37: Parking Standards

Appendix 4: Vehicle Parking Standards

DM38: Rear Servicing

S19: Transport

Appendix 4: Vehicle Parking Standards

A4.1 Introduction

This parking appendix sets out the vehicle parking standards that will apply to new development in the borough. It sets out the off-street vehicle parking standards that will apply to new developments. This Appendix should be read in conjunction with Policy S1 – Transport.

National Planning Policy Framework makes clear that if setting local parking standards for residential and non-residential development, policies should take into account:

- a) the accessibility of the development;
- b) the type, mix and use of development;
- c) the availability of and opportunities for public transport;
- d) local car ownership levels; and
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

In light of the above, there are likely to be situations where less parking than the minimum standards are appropriate, specifically in Town Centre locations or where there are opportunities to access public transport by multiple modes (e.g., rail and bus).

The vehicle parking standards in this Appendix apply to all developments for the provision of one or more residential units (gross) and all developments that result in the creation of non-residential floorspace. If a planning application for extensions / alterations (residential and non-residential) involves a significant increase in area, then the impact of the development on parking will be a material consideration and additional parking spaces may be sought to ensure that a suitable level of parking provision is made.

Where mixed use, residential and commercial developments are proposed, the parking requirements for each element should be calculated individually. However, consideration should be given to how parking spaces can be shared between uses, particularly the non-residential uses which are likely to attract the need for parking during the day. Applicants will be required to demonstrate how these shared spaces will be managed to ensure that the needs of all users on the site will be met, for example by preparing a parking strategy.

A4.1.1 Residential Development parking

It is important that new developments provide adequate parking provision so as not to increase parking on roads and increase congestion on public roads. Emphasis remains on promoting sustainable modes of travel and increasing active and public travel mode choice. Where greater access to amenities, public transport and active transport modes exist this enables residents to walk to access a lot of their daily needs.

Epsom Town Centre provides a good level of amenity and choice of public transport modes. Vehicle provision reflects the associated provision for vehicular parking due to the higher accessibility to amenities in this location.

Car parking spaces are based on maximum provision that development should provide. Reduced or even nil provision will be appropriate in support of the most efficient use of land particularly where there is a good level of access to public transport and amenities such as Epsom Town Centre.

Any development providing vehicle parking provision is expected to provide more than the minimum standards for cycle parking as set out in the cycle parking table below.

A4.2 Residential Parking Standards

A4.2.1 Epsom Town Centre (as defined on the policies map)

The following residential parking standards apply to development within the Epsom Town Centre boundary as defined on the Policies Map

Table A4.1: Residential parking standards in the town centre

Size of dwelling	Maximum car parking standard	Minimum Cycle Parking Requirements	
		Long stay (resident)	Short stay (visitor)
<u>1 bedroom</u>	0.75 space per dwelling	1 space per dwelling	Visitor cycle spaces will be expected at 10% of the long stay cycle spaces in developments of 5 units or more.
<u>2 bedroom</u>	0.75 space per dwelling	1 space per dwelling	
<u>3 bedroom</u>	1 space per dwelling	2 spaces per dwelling	
<u>4+ bedroom</u>	1 space per dwelling	2 spaces per dwelling	

A4.2.2 All other parts of the borough

The following residential parking standards apply to development located in all areas of the borough outside Epsom Town Centre boundary as defined on the Policies Map:

Table A4.2: Residential parking standards outside of town centre

Size of dwelling	Maximum car parking standard	Maximum Short stay (visitor) car parking standard	Minimum Cycle Parking Requirements	
			Long stay (resident)	Short stay (visitor)
<u>1 bedroom</u>	1 space per dwelling	1 space per 5 dwellings	1 space per dwelling	Visitor cycle spaces will be expected at 10% of the long stay cycle spaces in developments of 5 units or more.
<u>2 bedroom</u>	2 spaces per dwelling	1 space per 5 dwellings	1 space per dwelling	
<u>3 bedroom</u>	2 spaces per dwelling	1 space per 5 dwellings	2 spaces per dwelling	
<u>4+ bedroom</u>	3 spaces per dwelling	1 space per 5 dwellings	2 spaces per dwelling	

A4.2.3 Supporting notes to residential parking standards

Short stay (visitor) car parking standard – outside of Epsom Town Centre (as defined on the Policies Map) where the number of dwellings proposed is not a multiple of 5, provision will be rounded up. For example, for a proposal of 9 homes, 2 short stay visitor car parking spaces is the maximum requirement. However, provision is not required for proposals of less than 5 homes, but is encouraged where it is possible to incorporate into the development.

Short stay (visitor) cycle parking requirement – Visitor cycle spaces will be expected at 10% of the long stay spaces in developments of 5 units or more. Where the number of long stay resident spaces is not a multiple of 10, provision will be rounded up when the proportion is equal to or greater than .5, and rounded down when less than .5. For example, for a proposal of 12 2/3 bed homes, 24 long stay cycle spaces would be required, and therefore in this instance 2 short stay visitor spaces should be provided to serve the development.

Motorcycle parking – development proposals should provide motorcycle parking where possible, particularly where the proposed development consists wholly or in part of flats (i.e. where private garages are not available for parking motorcycles). The amount to be provided will be considered on a case by case basis.

Table A4.3: Older People’s Housing

Development	Requirement
<p>Sheltered Housing</p> <p>This type of housing is diverse, and ranges from retirement living homes with few shared facilities which are managed and maintained by staff living off site to homes with full time onsite managers and varying degrees of personal care as required. These types of housing will attract people with a wide demographic and health profile with variable car ownership levels.</p>	<p>Given the broad range of accommodation available within this type of housing and the resulting variability of parking requirements, parking will be considered on a site by site basis. A full assessment of likely parking need should be provided with a development proposal (including information about number of employees, expected visitor patterns and type of parking needed).</p> <p>As a starting point, it is likely that retirement homes will need to provide one parking space per home subject to location and accessibility by public transport, with additional space for visitors and staff. Where the type of housing involves more care and less likely travelling by car of residents, the amount of parking likely to be needed by residents may be less, however, more parking for staff may be required. Consideration should be given to the provision and allocation of disabled parking, recognising that a higher proportionate may be appropriate than the standard for dwelling houses.</p> <p>Cycle parking for long and short stay cycling (particularly for staff and visitors) and storage and charging provision for mobility vehicles, should be included where appropriate.</p>
<p>Nursing and Rest Homes</p> <p>Residents of this type of housing</p>	<p>Parking will be considered on a site by site basis. A full assessment of likely parking need should be provided with a development proposal (including information about number of employees, expected visitor patterns and type of parking needed).</p>

<p>will receive a high degree of support and care. This would include specialist care homes, for example those catering particularly for dementia care.</p>	<p>The amount of parking needed will depend on the level of care, whether the home is catering for a particular condition (for example, specialist dementia care), the location (for example, rural) and accessibility by public transport. This type of housing is likely to require less parking than 'sheltered housing' as above for residents, but more parking for staff, visitors and visiting medical staff (including emergency services).</p> <p>Consideration should be given to the provision and allocation of disabled parking, recognising that a higher proportion may be appropriate than the standard for dwelling houses.</p> <p>Cycle parking for long and short stay cycling (particularly for staff and visitors) and storage and charging provision for mobility vehicles, should be included where appropriate.</p>
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Table A4.4: Caravans (including mobile home parks, Traveller pitches and Travelling Showpeople plots)

Development	Minimum Parking requirement
Mobile home parks (C3 land use)	Parking provision should be made in accordance with the requirements for dwelling houses.
Traveller pitches (all pitches occupied by ethnic Travellers, regardless of meeting the planning definition as set out in Planning Policy for Traveller Sites).	<p>Parking provision should broadly follow the requirement for dwelling houses, however, given the tendency for the Traveller community to own vehicles for domestic and business use, higher than average levels of provision may be needed (although note excessive parking will be discouraged). Resident parking should be provided for, on individual pitches.</p> <p>Parking spaces must be a minimum of 2.4 x 4.8 metres, but where possible, provision should acknowledge the likelihood of larger cars and light vans on site, and provide some spaces at 2.4 x 5.5 metres in size.</p>

	<p>Visitor parking is an important consideration for Traveller pitches. Some visitor parking should be provided, ensuring that each pitch can accommodate at least one vehicle parking space for visitors, and if not, separate visitor parking within the overall site is provided. Separate parking areas should be situated in an area in good sight of the residents. Provision of visitor parking should particularly be the case where there is the potential risk that parking could overflow from the site and have a detrimental impact on the local highway network.</p> <p>Visitors sometimes bring touring caravans to a site for a few days at a time to attend a family event. However, Traveller accommodation is generally conditioned for a specific number of caravans, and visitors bringing touring caravans onto site could potentially contravene the conditions of the planning permission.</p> <p>Applicants seeking permission for Traveller accommodation should consider their likely visitor needs, and whether a planning condition specifying the number of days the site can be occupied by more than the allowed number of caravans (which permits visitors and allows attendance at family or community events) may be an appropriate mechanism (in accordance with Planning Policy for Traveller Sites (2023) para. 28).</p>
<p>Travelling Showpeople plots (all plots occupied by Travelling Showpeople, regardless of meeting the planning definition as set out in Planning Policy for Traveller Sites).</p>	<p>Travelling Showpeople plots are generally larger than Traveller pitches to accommodate the storage of equipment. Proposals should broadly follow the parking requirement for dwelling houses.</p> <p>Parking spaces for the residential use must be a minimum of 2.4 x 4.8 metres, but where possible, provision should acknowledge the likelihood of larger cars and light vans on site, and provide some spaces at 2.4 x 5.5 metres in size. The provision of space for the storage of equipment is a separate issue to general parking, and a separate planning consideration.</p> <p>Some visitor parking should be provided, ensuring that each plot can accommodate at least one parking space for visitors, and if not,</p>

	separate visitor parking within the overall site is provided. Separate parking areas may present security considerations for residents in some cases and should therefore be situated in an area in good sight of the residents. Provision of visitor parking should particularly be the case where there is the potential risk that parking could overflow from the site and have a detrimental impact on the local highway network.
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A4.2.4 Other forms of development parking

All other forms of development should adhere to the guidelines set out in [Surrey County Council's Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development](#) (November 2021) (as amended).

A4.3 Size of parking spaces

The table below details the standard parking space size requirements for specific types of vehicles. These should be used as basic minimum reference values but different layouts such as parallel, herringbone and in-line, will have slightly different overall space requirements.

In addition, sufficient space for turning facilities on site to allow vehicles to enter and leave in forward gear will be encouraged. Where vehicles reversing from or onto the highway would give rise to local highway safety issues, on-site turning space will be compulsory.

Table A4.5 Minimum parking space requirements for typical vehicles

Type of Vehicle	Size (metres)
Powered Two Wheelers	1.5 x 2.5
Car	2.4 x 4.8
Light vans	2.4 x 5.5
Rigid vehicles	3.5 x 14
Articulated vehicles	3.5 x 18.5
Coaches (60 seats)	3.5 x 14

A4.4 Size of garages

A single garage/car port should measure a minimum of 3m in width by 6m in length internally and a double garage/car port should measure a minimum of 6m by 6m internally. This will allow room for a car to be parked and still allow space for access down the side of the vehicle. The length is to allow room for storage, particularly cycles. A garage meeting these size requirements will count as one car parking space, and two bicycle spaces, subject to any exceptions described in this document.

A reduced size of garage/car port is unlikely to count as a vehicle parking space as it is unlikely to provide sufficient space for a vehicle and/or some storage.

This does not apply to car ports that cannot easily be used for storage. Car ports can assist with the design of hard landscaped car parks, and also encourage people to use the parking spaces, to help avoid frosts, or keep cars in the shade.

Appendix 5: Guidance on the Marketing Requirements for Change of Use Applications

A5.1 Introduction

The guidance provides clarification on the marketing and economic viability evidence that would be required from applicants proposing schemes that would result in the loss of certain uses. These include employment land, local retail facilities, visitor accommodation and community facilities.

This guidance is intended to support applicants, agents and developers so that they can provide the council with all the information it needs to determine applications for change of use of certain buildings, sites or land. The requirement to demonstrate that a site has been effectively marketed before a change of use can be considered is found throughout the various policies within the Local Plan.

Section 1 of this guidance sets out the policy context for marketing and viability requirements.

Section 2 explains the minimum action required when actively marketing premises and/or sites, and outlines the marketing evidence which must be provided to the council when submitting an application for change of use.

Section 3 provides information on the financial viability evidence required to demonstrate that the premises and/or site is no longer suitable for its current type of use.

Section 4 specifically applies to applications for the loss of community facilities and sets out requirements for demonstrating a lack of need for the facility.

The types of use for which marketing, viability testing and/or need testing are required, before an application for their change of use can be permitted, are set out in Table A5, along with the minimum marketing period expected.

Table A5: Types of Use and Minimum Marketing Periods

Local Plan policy	Land Use	Minimum marketing period
Policy DM2 - Self-Build and Custom Housebuilding	Self and custom build dwellings	12 months
Policy DM6: Neighbourhood Parades and Isolated Shops	Main town centre uses (as defined by the NPPF)	12 months
Policy DM7 – Employment Land	Uses are those that fall within Classes B2, B8 and E (g) of the Use Classes order and Sui Generis uses that do not fall within the aforementioned use classes but have similar accommodation and location requirements (for example trade counters).	12 months
Policy DM8 – Racehorse Training Zone	Racehorse training or equestrian	18 months
Policy DM9: Visitor Accommodation	Visitor accommodation (holiday or short stay accommodation)	12 months
Policy DM20: Community and Cultural Facilities	Land and premises in, or most recently in community or cultural use	18 months

Documented marketing of sites in the various uses identified in Table A5 will assist applicants in satisfying the requirements of the associated policies. It should be recognised that all other relevant planning policies to the proposal will be considered in the determination of the application.

A5.2 Marketing information required from applicants

A marketing report should be submitted with the planning application. This should set out the details of the marketing that has been undertaken and demonstrate that there is no market demand for the premises in their current use or any use detailed in Table A5. This exercise should take account of the following points:

- a) Vacant or under-used premises or sites should be continuously marketed under their existing use, or a use in the same category, for a minimum period as set out in Table 1. The marketing period must have ended on a date no more than nine months before the date the planning application was submitted. In some cases, a longer period of marketing may be required in order to provide sufficient evidence that demand is lacking. The advice of the council should be sought prior to the commencement of any marketing campaign to ascertain the period and extent of marketing required.
- b) Where premises are in poor condition or have been partially demolished, the site should also be marketed for the potential redevelopment to reflect the existing use, or for equivalent uses within the relevant category (subject to the policy requirements of the Local Plan).
- c) The marketing should target potential occupiers with a variety of means. Dated copies of all sales literature, and in the case of marketing boards, dated photographs, will be required in the marketing report in order to demonstrate a sustained marketing effort. As a minimum, the following measures should be used:
 - i) Property details made available through a minimum of one local, professionally accredited commercial agent with a specialism in the property type. The property details (particulars) should as a minimum detail:
 - The type and size of the property/site;
 - Address and location information; and
 - Leasehold rent and/or freehold sale.
 - ii) A copy of the dated letter of instruction to the commercial agent and dated copies of the agent's property details should be included in the marketing report.
 - iii) On-site/premises marketing boards (unless within a Conservation Area), of an appropriate quality, size, scale, location and number, in place throughout the period in which the property is being marketed.
 - iv) Web-based marketing through a prominent location on the appointed commercial agent's website and other relevant search engines, such as Estates Gazette Interactive at www.egi.co.uk. Depending on the type of premises being marketed, marketing through the website of a national and / or specialist estate agent may also be required.

- v) Advertising covering at least the minimum required period as shown in Table 1, within relevant publications, such as the Estates Gazette, local press, appropriate trade magazines/journals and trade websites, and any publications produced by local business networks and support agencies.
- d) The premises and/or site should be marketed at a price and associated terms that are commensurate with market values for the existing use, based on evidence from recent and comparable transactions and deals. Where possible, at least three examples should be provided of completed transactions involving a similar site or premises and similar terms within the local area, preferably within the last twelve months, or written evidence from an independent qualified valuer on the market values in the local area. All information about price and terms should be provided in a format that enables easy comparison, using equivalent and comparable expressions of price per unit of floorspace. Where the price changed during the period of the marketing campaign, the reasons for this should be recorded and included in the marketing report.
- e) Where premises are marketed for lease, the length of lease offered should not be unduly restrictive and should include the potential for a short-term lease in appropriate cases. Details of the lease terms offered should be included in the marketing report, along with any changes made to the terms offered during the period of the marketing campaign and the reasons for this.
- f) The marketing exercise should reflect the existing use of the premises or business in its entirety, and not parts of it. For example, the buildings should not be marketed separately to the accompanying car park.
- g) The marketing agent should keep a log of enquiries throughout the period of the marketing campaign. This should record the date and nature of the enquiry (such as the type of business enquiring), how the enquirer found out about the premises, whether the enquiry resulted in a site visit, and the reasons given for not progressing an offer on the premises. This log should be submitted as part of the marketing report.
- h) Where the flow of enquiries has been limited or is decreasing during the period of marketing, the marketing report should explain any measures taken to refresh the marketing campaign. It is reasonable that other equivalent uses within the same category (see Table 1) may also be explored. In circumstances where proposals do not fully meet relevant guidance it will be for developers to demonstrate through their marketing report that their marketing campaign was sufficiently wide-ranging, of adequate length that the asking price and terms were realistic and that specialists appropriate to the type of use were engaged.

Marketing the site as outlined above will assist the council in assessing the value of the land/premises in question, allowing them to evaluate whether there is a need for the existing use to be retained or

whether the proposed reuse would deliver development that improves the economic, social and environmental conditions in the area.

It should not be assumed that any lack of potential market interest in the property for its existing use would automatically result in a favourable consideration of an application for non-compliant use.

In summary, the marketing statement should include all details and evidence of the steps taken to market the building/site as detailed above. If these requirements have not been met, the council may require additional marketing before the marketing can be considered acceptable.

Following receipt of the marketing report the council will review the content and compare this to evidence, potentially including but not limited to:

- Housing and Economic Development Needs Assessment
- Evidence published by Surrey Council
- Retail and Commercial Leisure Needs Assessment
- Authority Monitoring Report
- Accessing a third-party commercial property database (if available)

A5.3 Financial viability information required from applicants

This guidance relates only to the loss of the uses listed in Table A5a, where the applicant is required to demonstrate that it would be unviable to continue with the site in its current use or one that is equivalent. It does not relate to demonstrating the viability or otherwise of new types of uses, when taking into account planning obligations such as, for example, affordable housing. The viability of new uses should, where necessary, be considered separately.

However, evidence of existing or equivalent alternative uses being unviable will inform the existing land value and may therefore be material in considering the viability of any new use.

The council will therefore require a financial viability appraisal that clearly demonstrates that the retention of the site (in full or in part) for its current use, or one that is equivalent, is not financially viable. It is important to note that the council will appoint a third party, at the cost of the applicant, to assess the evidence submitted as necessary.

The financial viability appraisal should include (but is not limited to) the following information:

- a) A valuation of the site in its existing use (ignoring the 'hope value' of alternative uses). The council may seek an independent valuation of the site, with the cost to be met by the applicant;
- b) For commercial community facilities, at least the last three years of accounts for the business;
- c) The total cost of development or redevelopment of the site for equivalent uses within the relevant category set out in Table 1;

- d) Information/evidence to support rents, sales values, capital values and rental yields adopted for the appraisal;
- e) Sensitivity testing to support the robustness of the report's conclusions against changing market conditions; and
- f) Evidence to illustrate that it would not be economically viable to retain the building or site for its existing or any other equivalent use falling within the same category as set out in Table 1 above.
- g) Wherever feasible, the viability appraisal should be carried out while the site is still in operation.

The council will require evidence that demonstrates that the business or facility has been operated positively. Proposals for loss must not be based solely on the needs of the current owner/tenant or their chosen business model. Applicants will need to look at the full range of potential uses or ways of operating a business or facility within its existing use category or other use categories that would be suitable in policy terms, to demonstrate that it is not workable in the long term. This includes the potential of the site for additional complementary developments that could make the business more viable.

The viability appraisal should, where relevant, include consideration of the potential for grant funding from public or charitable bodies to support uses on the site that are appropriate in policy terms.

A5.4 Evidence of need (community and cultural uses)

Developers must carry out an assessment of the needs of the local community for community or cultural facilities to show that the existing premises is no longer needed for the community or cultural use, and whether adequate alternative provision is available in the area to meet the needs of residents, workers and visitors.

Any alternative facilities proposed as meeting the need must be accessible, inclusive and available without causing unreasonable reduction or shortfall in the local service provision.

The presence of another facility within the same category in the vicinity will not in itself be enough to meet this requirement; it must be demonstrated that the alternative facility caters, or can be reasonably expected to cater, for the same community need as that served by the facility whose loss is proposed.

If alternative facilities as described above are not proposed, the council will also require clear evidence that the facility is under-used, in terms of the number of people using it relative to its size and facilities, and in terms of the frequency and intensity of its use.

Furthermore, evidence will be required that it has seen a significant decline in its use over a sustained period. This will however be considered against any removal or diminution of facilities or services during this same period which may itself have caused the fall in its use.

Appendix 6: Guidance for Proposals Impacting Heritage Assets

In the spirit of the vision and strategic objectives of this Local Plan, Epsom and Ewell Borough Council (EEBC) places great weight on the importance of preserving and enhancing its heritage assets. It recognises that matters of conservation of the built environment can often be more nuanced than other material considerations when determining the “planning balance,” and a cause of uncertainty. For this reason, and to aid decision makers, the information in this appendix is intended to provide further clarity or useful signposts for applicants and decision makers in the planning process when considering proposals affecting heritage assets.

This appendix is written in the context of the National Planning Policy Framework (NPPF), National Planning Policy Guidance (NPPG), and guidance by Surrey County Council and Historic England. It does not, therefore, seek to repeat existing policy, guidance or planning application / Listed Building Consent validation guidance. Rather, it seeks to complement policy S13 and DM13 by providing an indication of what the Council, through its Local Plan, considers unique and important to the historic character of Epsom and Ewell in more detail, in order to aid approaches to development proposals. It is intended neither as exhaustive or prescriptive advice.

A6.1 What makes Epsom and Ewell unique?

Though a small borough, Epsom and Ewell is internationally renowned; not least for its association with equestrian prowess and natural springs but its intrinsic connection to key moments in the UK’s history, such as women’s suffrage, the Roman, Tudor and wartime periods. However, it is not just the borough’s national and international reputation that gives it a unique sense of place. There is a rich and diverse legacy of local community activity and commerce, that have helped to shape the borough as it exists today, and provides important to context for shaping its development in the future. This includes the transformation of the borough through the extension of railways in 1847 and 1859.

The built environment provides a reference for that culture and those who have experienced the borough will be connected by their experiences and observations of its built environment and sense of place, and it is important that these references and connections are preserved. For more information, please refer to the Epsom and Ewell Heritage Topic Paper, submitted with the Local Plan to examination.

A6.2 How do I know what’s important and what’s not?

Every development has a degree of uniqueness. But when considered in more depth, some developments contain features that are more intrinsic to a wider and better-defined character than others. The Local Plan therefore identifies different classifications of designated “heritage” assets, to help better define those with more relevance to historic character than others:

A6.2.1 Scheduled Ancient Monuments and Areas of High Archaeological Potential

The Borough contains two Scheduled Ancient Monuments (SAM) - the site of Nonsuch Palace and its associated remains, and St Mary's Church Tower in Ewell. Additionally, there is one identified County Site of Archaeological Importance in the Borough - 'Diana's Dyke', a site close to Nonsuch Palace. All proposals will be expected to follow all National Government and County National and County Policy and Guidance regarding these sites. In the majority of instances, the advice of Surrey County Council should also be sought.

Within Areas of High Archaeological Potential, as identified on the Proposals Map, or outside of these areas on any major development site of 0.4ha or greater, applicants are required to undertake prior assessment of the possible archaeological significance of the site and the implications of their proposals, and may be required to submit, as a minimum, a desk-based assessment to accompany any application. Where desk-based assessment suggests the likelihood of archaeological remains, the Council will require the results of an archaeological evaluation in order to inform the determination of the application.

A6.2.2 Conservation Areas

The Council has used powers under Section 69, Part II of the Planning (Listed Buildings and Conservation Areas) Act 1990 to designate 21 Conservation areas. Each Conservation Area has been appraised for its features of significance and provides clarity about what in those areas should be preserved and enhanced. As such, any application for development will be expected to demonstrate how it will be sympathetic to features which have been identified as contributing to a property's historic significance, in the context of the Local Plan Policies, National Planning Policy and Guidance and other relevant Historic England guidance. These features include, but are not limited to:

- The relevant architectural style of the area, such as Surrey Vernacular/Revival Vernacular styling.
- Historic street patterns and space around buildings such as green space and gardens.
- Boundary treatments.
- Laid to lawn front gardens and natural planting, particularly shrubs and hedges.
- Historic external walling such as brick, timber framing, pebbledash, tile hanging, and weatherboarding.
- Historic roof coverings such as Welsh slate, clay tiles, and pantiles.
- Chimney stacks and clay pots.
- External doors and porches.
- Timber framed sash windows, metal framed windows with leaded lights and others.
- Historic street furniture, such as streetlights, pillar boxes and phone boxes.
- Historic paving including York stone and cobbles.
- Views into and from Conservation Areas.

A6.2.3 Registered Parks and Gardens

Nonsuch Park is included on the Register of Historic Parks and Gardens of Special Historic Interest, meaning that any development impact on the landscapes' special character must be considered.

A6.2.4 Listed Buildings

The Borough contains over 400 Listed Buildings, which are registered with Historic England. The official list descriptions by Historic England comprise basic details and should not be relied on as a definitive description of what about each building (including within its curtilage) is worthy of protection. Often, the submission of an application will allow deeper analysis, revealing other features of importance. Features that are commonly identified of being worthy of protection, include:

- All features that contribute to a Conservation Areas (described above), if located in or adjacent to one.
- Period features.
- Plan form, room shapes, walling and partitioning.
- Internal doors and architraves.
- Fireplaces and chimney pieces.
- Joinery, such as balustrading, stairs, skirtings and cupboards.
- Carpentry, such as structural woodwork, joists and floorboards.
- Plaster work, such as cornices and ceiling roses.
- Any other feature of historic significance.

A6.2.5 Locally Listed Buildings

Listed Building Consent applications are not required for alterations to *Locally Listed Buildings* (i.e. buildings that are not registered as listed by Historic England). However, where planning permission is required for development affecting them, applications will normally warrant deeper scrutiny of the impact on their historic and/or architectural significance.

A6.2.6 Other non-designated Heritage Assets

The significance of buildings to the character of an area evolves over time. Whilst the Council will continue to conduct "stock takes" of its heritage assets through appraisals and lists, the evolution of the historic significance of buildings cannot be monitored constantly. Therefore, there may be instances where a heritage asset previously unknown becomes recognised (e.g. through the assessment of a planning application). In these instances, the Council will work with applicants to ensure that assets are protected, and appropriate solutions found to overcome development challenges.

A6.3 Preferred approach to development proposals impacting heritage assets

In addition to policy S13 and DM13 of the Local Plan, national planning policy and guidance from Historic England and Surrey County Council sets out the Council's approach to decision making for development impacting heritage assets.

However, the merits of each development proposal against this policy and guidance will normally require more detailed assessment than for other proposals. To aid these assessments, additional information such as a Heritage Statement, will be required (as stipulated by the Local Validation Checklist). Applicants are strongly advised to use the opportunity offered by the planning application and Listed Building Consent process, to demonstrate how proposals have attempted to preserve or enhance heritage assets, and work with Council staff to reduce and remove harm where it occurs. In order to aid this process, early and proactive engagement through the Council's pre application service is strongly recommended.