

25/00995/FUL The Looe, Reigate Road, Ewell, Surrey

Application Number	25/00995/FUL
Application Type	Full Planning Permission (Major)
Address	The Looe, Reigate Road, Ewell KT17 3BZ
Ward	Nonsuch
Proposal	Demolition of existing buildings and redevelopment of the site to provide a part single, part 2 storey building providing 9 no. industrial and business units comprising 1no. Class E (Commercial, Business and Services), 4no. Class B2 (General Industrial) and 4no. Class B2 (Storage and Distribution) uses with a total floorspace of 1,000.2sq.m, together with ancillary offices, associated car parking and landscaping
Expiry Date	02 March 2026
Recommendation	Approval, subject to conditions and legal agreement
Number of Submissions	3
Reason for Committee	Major development
Case Officer	Gemma Paterson, Development Management Team Leader
Contact Officer	Simon Taylor, Head of Development Management and Planning Enforcement
Plans, Documents and Submissions	Available at The Looe
Glossary of Terms	Found at the following link: Glossary of Terms



SUMMARY

1. Summary and Recommendation

- 1.1. The application is classified as a Major planning application and is referred to Planning Committee in accordance with Epsom and Ewell Borough Council's Scheme of Delegation.
- 1.2. The application seeks planning permission for the demolition of the existing two single storey buildings that contain 17 commercial units and the erection of a part single storey, part two storey building to accommodate 9 commercial units with associated car and cycle parking, landscaping and ancillary development.
- 1.3. The proposed development would result in an overall increase in commercial floorspace, from 732m² to 1214m² (+418m²), whilst resulting in a loss of 109m² Class E(c)(iii) (Office) floorspace and a 302m² increase in Class B2 (General Industrial) floor space and a 457m² increase in Class B2 (Storage and Distribution).
- 1.4. The site lies within an undesignated employment area and presently contains 17 single storey commercial units comprising a mix of Class E(c)(iii) (Office), Class B2 (General Industrial) and Class B2 (Storage and Distribution) uses. It is accessed via an 80m long access road which connects the site to the A240 Reigate Road, which in turn connects to the A24 to the north and the A217 to the south.
- 1.5. The site is located within the Green Belt which is identified as a protected area/asset of particular importance. The proposed development complies with the relevant requirements of paragraph 155 of the NPPF by virtue of it being defined as Grey Belt and therefore is not inappropriate development.
- 1.6. Although the proposal would result in the loss of Class E(c)(iii) (Office) floorspace from the site, there is sufficient opportunity within the existing office clusters to accommodate the loss and the existing/future Class E(c)(iii) (Office) floorspace demands over the plan period.
- 1.7. The increase in Class B2 (General Industrial) and Class B2 (Storage and Distribution) floorspace created by the proposed development would meet a demonstrable unmet need for industrial floorspace in the Borough.
- 1.8. The proposed development would deliver pedestrian improvements to Reigate Road to optimise the sustainability of the location, including new footpath provision and a pedestrian refuge to connect to the existing pedestrian network to the south of Reigate Road.
- 1.9. The proposed development would increase the biodiversity value of the site, retaining existing ecological features and creating new biodiversity

rich habitats, resulting in a biodiversity net gain of 12% for habitat units, which represents an excess gain above the mandatory requirement of 10%.

- 1.10. Whilst the proposal would generate slightly more pedestrian and vehicle movements onto the surrounding highway network than the existing commercial use of the site, the County Highway Authority are satisfied that there would not be a severe impact on the local highway network.
- 1.11. Subject to appropriate conditions in the event planning permission is granted, the proposed development would accord with national and local policies in relation to design, neighbouring amenity, ecology, flood risk, land contamination and environmental sustainability.
- 1.12. Whilst the Council does not have up-to-date Local Plan, Officers are satisfied that the policies within that are relevant to this application remain consistent with the NPPF and can be given weight accordingly.
- 1.13. Officers conclude that in applying the planning balance, there would be no harm associated with the development that would outweigh the limited benefits, when assessed against the policies in the NPPF taken as a whole.

PROPOSAL

2. Description of Proposal

2.1. The proposal involves the following works:

- The demolition of two single storey buildings containing 17 commercial units
- The erection of a part single/part two storey building containing nine commercial units with solar panels on the roof
- Car parking for 16 vehicles, with access and turning space
- Cycle parking for 18 bikes
- Ancillary works including hard and soft landscaping and boundary treatments
- Siting of a single storey security and plant hut

3. Key Information

	Existing	Proposed
Site Area	0.251ha	
Total Floorspace	732m ²	1214m ² (+418m ²)
- Class E Class E(c)(iii) (Office)	386m ²	109m ² (-277m ²)
- Class B2 (General Industrial)	43m ²	345m ² (+302m ²)

	Existing	Proposed
- Class B2 (Storage and Distribution)	303m ²	760m ² (+457m ²)
Number of Storeys	1 storey	1 -2 storeys
Car Parking Spaces	No dedicated spaces	16 spaces
Cycle Parking Spaces	None	18 spaces

SITE

4. Description

- 4.1. The site lies within a mixed-use area and contains 17 single storey commercial units comprising a mix of Class E(c)(iii) (Office), Class B2 (General Industrial) and Class B2 (Storage and Distribution) uses. It is accessed via an 80m long access road which connects the site to the A240 Reigate Road, which in turn connects to the A24 to the north and the A217 to the south.
- 4.2. Reigate Road is predominantly residential in character and appearance, comprising detached houses; the rear gardens of Priestmere Cottage and 1-2 North Looe Cottages, Reigate Road, form the south west boundary of the site. To the north west lies Priest Hill Close, a residential street also comprising detached houses.
- 4.3. To the north-north east lies a detached bungalow called 'The Bungalow'. This property appears to be in residential use however the site is advertised for car sales.
- 4.4. To the north east lies the Paddock, consisting of industrial and commercial units occupied by a variety of operators. To the south east lies April Cottage, a single storey bungalow in residential use, and beyond is Beechcroft Nursery Garden Centre.

5. Constraints

- Green Belt
- Site of Special Scientific Interest Risk Area
- Great Crested Newt Impact Zone (low habitat suitability)
- Bat Survey Area
- Surrey Waste and Mineral Site
- Potentially contaminated Land
- Flood Zone 1
- Critical Drainage Area (part of site)
- Classified A Road

6. History

App No.	Description	Status
95/00339/FUL	Relaxation of EPS 12892/2632 to allow unrestricted use within Use Class B2 (Storage and Distribution)	Granted 23.11.95
95/00338/FUL	Relaxation of EPS 12892/2632 to allow unrestricted use within Use Class B2 (Storage and Distribution)	Granted 23.11.95
93/00593/CLE	Use of units 1 & 2 as offices & units 3 & 4 for storage ancillary to the main use of the site	Granted 10.01.94

CONSULTATIONS

Consultee	Comments
External Consultees	
Surrey Minerals and Waste	No objection subject to condition
County Highway Authority	No objection subject to condition
Lead Local Flood Authority	No objection subject to condition
Surrey Archaeology	Does not meet the criteria for archology assessment. No archaeological concerns.
Internal Consultees	
Council's Land Contamination Officer	No objection subject to condition
Council's Tree Officer	No objection subject to condition
Council's Ecologist	No objection subject to condition
Council's Waste and Transport Manager	No objection

Public Consultation

Neighbours	<p>The application was advertised by means of a site notice, press notice and notification to 55 neighbouring properties, concluding on 25 September 2025. Three submissions were received, which raised the following issues:</p> <ul style="list-style-type: none"> • Access to the site already struggles to cope with the sizes of lorries, some with trailers that use the paddock. • Vehicles accessing the site can block the oncoming traffic in Reigate Road whilst waiting for other lorries to exit access to the site. The entrance to this right of way is not deep enough for a lorry to wait without overhanging into Reigate Road, making dangerous manoeuvres to get past. • Existing foul sewer would be overwhelmed with additional bathrooms
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- Concerns regarding the position of the proposed security/plant building impeding maintenance and repair of boundary wall shared with Priestmere Cottage
- Concerns regarding the demolition of the building on boundary with asbestos
- Concerns regarding maintaining boundary treatments.

Officer Comment: Traffic and access concerns are discussed in Sections 12 and 13 of this Agenda Report.

With respect to foul sewage capacity, the proposal would introduce three new bathroom facilities above the level currently existing on site. The details submitted in support of this application advise that these new facilities would be connected to the existing mains sewer. Officers are satisfied that three additional bathroom facilities connected to the existing main sewer would not cause significant harm to the capacity of the existing main sewer system in the area.

Matters relating to the retention of boundary treatments in third party ownership are a civil matter and not a material planning consideration. Removal of asbestos is covered under separate legislation.

One submission of support was received:

- The existing buildings in The Looe are somewhat dilapidated. This proposal would enhance the area and would look more presentable.

PLANNING LEGISLATION, POLICY, AND GUIDANCE

7. Planning Policy

7.1. National Planning Policy Framework 2024 (NPPF)

- Section 2: Achieving Sustainable Development
- Section 4: Decision-Making
- Section 6: Building a Strong, Competitive Economy
- Section 9: Promoting Sustainable Transport
- Section 12: Achieving Well-Designed and Beautiful Places
- Section 13: Protecting Green Belt Land
- Section 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change
- Section 15: Conserving and Enhancing the Natural Environment

7.2. National Planning Policy for Waste 2014

- Section 5: Determining Planning Applications

7.3. Epsom and Ewell Core Strategy 2007 (CS)

- Policy CS1: Sustainable Development
- Policy CS2: Green Belt
- Policy CS3: Biodiversity and Designated Nature Conservation Areas
- Policy CS5: The Built Environment
- Policy CS6: Sustainability in New Development
- Policy CS11: Employment Provision
- Policy CS16: Managing Transport and Travel

7.4. Epsom and Ewell Development Management Policies Document 2015 (DMPD)

- Policy DM1: Extent of the Green Belt
- Policy DM4: Biodiversity and New Development
- Policy DM5: Trees and Landscape
- Policy DM9: Townscape Character and Local Distinctiveness
- Policy DM10: Design Requirements for New Developments
- Policy DM19: Development and Flood Risk
- Policy DM24: Employment Uses Outside of Existing Employment Policy Areas
- Policy DM25: Development of Employment Premises
- Policy DM35: Transport and New Development
- Policy DM36: Sustainable Transport for New Development
- Policy DM37: Parking Standards

7.5. Surrey Waste Local Plan 2020

- Policy 4: Sustainable Construction and Waste Management in New Development

7.6. Emerging Local Plan

7.7. It is acknowledged that there are a range of draft policies within the emerging Local Plan. Whilst they may be relevant to this application, they presently have limited weight given that the Plan is currently at examination stage and not yet adopted.

7.8. Supplementary Planning Documents and Guidance

- Sustainable Design Supplementary Planning Document 2016

7.9. Other Documentation

- Council's Green Belt Update 2024
- Epsom & Ewell Borough Council Housing and Economic Development Needs Assessment 2023 (HEDNA)
- Surrey Transport Plan 2022–2032

- Surrey County Council Vehicular, Electric Vehicle and Cycle Parking Guidance for New Developments 2023

PLANNING ASSESSMENT

8. Presumption in Favour of Sustainable Development

- 8.1. Paragraph 11 of the NPPF stipulates that development proposals which accord with an up-to-date development plan should be approved and where a proposal conflicts with an up-to-date development plan, permission should not usually be granted.
- 8.2. Although the Council does not have an up-to-date development plan due to expiration, whether the policies contained within are out of date is a matter of planning judgment. Officers are satisfied that the Council's policies which are most important for determining this application, which are set out in Core Strategy 2007 and the Development Management Policy Document 2015 are consistent with those set out in the NPPF.

9. Principle of Development

9.1. Green Belt

- 9.2. The site lies within Green Belt. The Government attaches great importance to Green Belts, with the fundamental aim of Green Belt policy being to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- 9.3. Paragraph 143 of the NPPF states that Green Belt serves five purposes:
 - a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 9.4. Paragraph 153 of the NPPF, reinforced in Policy CS2 of the CS, states that substantial weight must be given to any harm to the Green Belt, including harm to its openness and that that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 9.5. Footnote 55 to the NPPF sets out that if development is not inappropriate development on previously developed land or grey belt, then this is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness.

- 9.6. Paragraph 153 of the NPPF further states that Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. It adds that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 9.7. Paragraph 154 of the NPPF sets out a limited number of exceptions to inappropriate development in the Green Belt.
- 9.8. Paragraph 155 of the NPPF sets out that the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:
- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
 - b. There is a demonstrable unmet need for the type of development proposed;
 - c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
 - d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157.
- 9.9. Policy CS2 of the CS protects the Green Belt's key functions, seeks to maintain its existing general extent and, within its boundaries, ensure that strict control will continue to be exercised over inappropriate development as defined by Government policy.
- 9.10. Grey Belt**
- 9.11. Annex 2 of the NPPF defines 'grey belt' as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143 of the NPPF, and excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.
- 9.12. Purpose (a) relates to the sprawl of large built-up areas, purpose (b) prevents the coalescence of towns and purpose (d) preserves the setting and special character of historic towns.
- Purpose (a) - to check the unrestricted sprawl of large built-up areas
- 9.13. In considering the contribution of the site makes to purpose (a) of the Green Belt, regard is given to the advice in the Planning Practice

Guidance (PPG)¹. The site lies adjacent to the built-up area, is partially enclosed by, and contains existing development and is subject to other urbanising influences, such as the well trafficked Reigate Road. The PPG considers these characteristics to weaken the site's contribution to the Green Belt.

- 9.14. Furthermore, the site is identified in the Council's Green Belt Update 2024 (Parcel ID P52) as not performing against purpose (a). As such, the site does not strongly contribute to Green Belt purpose (a) of paragraph 143 of the NPPF.

Purpose (b) to prevent the coalescence of towns

- 9.15. The site does not form part of a gap between towns and cannot strongly contribute to Green Belt purpose (b).

Purpose (d) to preserve the setting and special character of historic towns

- 9.16. The site does not form part of the setting of a historic town and cannot strongly contribute to Green Belt purpose (d).

9.17. Grey Belt Conclusion

- 9.18. Officers are satisfied that the site would meet the definition of grey belt as outlined in Annex 2 of the NPPF.

9.19. Paragraph 155 of the NPPF

- 9.20. Paragraph 155 of the NPPF states that the development of commercial development should be regarded as not inappropriate where the following apply:

(a) development would utilise Grey Belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

- 9.21. In considered the above, the PPG advises that authorities should consider whether, or the extent to which, the release or development of Green Belt land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.

- 9.22. Epsom and Ewell Borough Council's Green Belt encompasses roughly 43% of the Borough's land. Although the proposed development would cause harm to openness and impact on Green Belt purpose (c) regarding assisting in safeguarding the countryside from encroachment, this would not fundamentally undermine the ability of the remaining Green Belt land across the area of the plan from meeting all five of the Green Belt

¹ Paragraph: [005 Reference ID: 64-005-20250225](#)

purposes in a meaningful way. The proposal development would therefore meet criterion (a) of paragraph 155 of the NPPF.

(b) there is a demonstrable need for the type of development proposed:

- 9.23. Policy DM24 of the DMPD seeks to retain employment floorspace outside of the existing identified employment locations, whilst Policy DM25 of the DMPD supports employment developments provides that the accommodation is flexible and suitable to meet future needs.
- 9.24. Although site comprises an employment area outside of the defined strategic employment sites, it makes a valuable contribution towards the economy of the Borough.
- 9.25. The proposed development would result in the loss of 277m² of Class E floorspace from the site but would deliver a further 302m² of Class B2 (General Industrial) floorspace and 457m² of Class B2 (Storage and Distribution) floorspace.
- 9.26. The site currently contains the following Class E1 uses:

Unit Number	Area	Use	Use Class
Unit A The Barn	145.48m ²	Workshop	Class E(c)(iii)
Unit B The Barn	145.2m ²	Office	Class E(c)(iii)
Unit 1	13.15m ²	Office	Class E(c)(iii)
Unit 2	12.81m ²	Office	Class E(c)(iii)
Unit 3	15.28m ²	Music Studio	Class E(d)
Unit 4	14.25m ²	Personal Gym	Class E(d)

- 9.27. Council's HEDNA highlights that demand for Class E(c)(iii) (Office) floor space has fallen and future need of office spaces would be limited. Notwithstanding, in considering the economic growth of the Borough, the HEDNA forecasts an additional future need of office space to be 19,437m² over the period 2022 to 2040.
- 9.28. However, the HEDNA also identifies that the current office clusters, such as Epsom Town Centre and the sites at East Street represent opportunities for office spaces to meet demand. Whilst the loss of 171m² of office floor space from the site is regrettable, there is sufficient opportunity within the existing office clusters to accommodate the loss and the existing/ future Class E(c)(iii) (Office) floorspace demands over the plan period.
- 9.29. For industrial floorspace, the HEDNA identifies an increasing need over the period 2022 to 2040, recommending a need for 9,021m² of light for industrial (Class E(g)(iii)) floorspace, 9,554m² of Class B2 (General Industrial) floorspace and 18,157m² of Class B2 (Storage and Distribution) floorspace to cover the plan period. The proposed development would provide an additional 795m² of industrial floorspace in an established

employment area that would meet the existing unmet need and increasing future need for the Borough.

- 9.30. Officers are satisfied that the proposed development would be of an appropriate type to meet the demonstrable unmet need for industrial floorspace in the Borough. The development would therefore meet criterion (b) of paragraph 155 of the NPPF.
- 9.31. Whilst it is recognised that Class E has a diverse range of uses within the class and that movement from one primary use to another within the same use class can occur without planning permission, Officers consider it unreasonable to restrict the Class E use given the existing Class E1 floorspace is already significantly reduced and it is not currently restricted.

(c) the development would be in a sustainable location with particular reference to paragraph 110 and 115 of the NPPF;

- 9.32. Paragraph 110 of NPPF encourages significant development to be focused on locations which are, or can be made, sustainable through limiting the need to travel and offering a genuine choice of transport modes, although recognising that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in decision-making.
- 9.33. Paragraph 115 of NPPF requires applications for new development to ensure that:
- a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;
 - b) safe and suitable access to the site can be achieved for all users;
 - c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
 - d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.
- 9.34. Policy DM25 of the DMPD supports employment development that is compatible with the level of existing or potential public transport accessibility.
- 9.35. The site is within 965m (15-minute walk) of the Drift Bridge shopping parade on Fir Tree Road, which has a range of services, amenities and facilities.
- 9.36. The site also benefits from adequate access to public transport provision, with two bus stops (Drift Bridge) located 900m (15-minute walk) to the

south east of the site, providing an hourly service on weekdays and Saturdays between Epsom and Croydon.

- 9.37. Epsom Downs Station is located 1km (15-minute walk) of the site and provides regular and two direct services per hours to London Victoria.
- 9.38. Officers are satisfied that the proposed development would be in a sustainable location as required by criterion (c) of paragraph 155 of the NPPF.

(d) Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 of the NPPF

- 9.39. The Golden Rules apply where housing is proposed, and criterion (d) of paragraph 155 is therefore not relevant to this assessment.

9.40. Paragraph 155 Conclusion

- 9.41. The proposed development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan; would meet a demonstrable need for commercial development and would be in a sustainable location, thereby meeting the requirements (a) – (c) of paragraph 155 of the NPPF. Requirement (d) is not relevant to this assessment.

9.42. Green Belt Conclusion

- 9.43. For the reasons set out above, the proposal development would not be inappropriate development in the Green Belt and would accord with the provision of Green Belt policy within the NPPF, most notably paragraph 155.
- 9.44. It is not necessary to consider the effect of the proposed development upon the openness and remaining purposes of the Green Belt, as this is implicitly considered in this exception, nor would there be any very special circumstances needed to justify the proposed development.

10. Trees and Landscaping

- 10.1. Paragraph 136 of the NPPF, Policy CS3 of the CS, Policy DM5 of the DMPD and the Householder SPG seek the retention, protection and enhancement of existing and new trees, hedgerows, and other landscape features, with removal of trees supported by sound justification and appropriate replacement planting of native species.
- 10.2. The application is accompanied by an Arboricultural Planning and Survey Report, prepared by Graftin Gardeners Ltd, reference 25 0004 The Looe and dated 21 June 2025. The Report also contains an Arboricultural Impact Assessment and an Arboricultural Method Statement.

- 10.3. The Report confirms that the site itself does not contain any trees, but there are off site trees in close proximity. Eight individual trees and two groups were surveyed off site – two are identified as moderate quality Category B trees (T2 and T5, both Sycamores), with the remaining six individual trees categorised at low quality Category C trees.
- 10.4. It is noted that historically the site contained two trees and that these are visible on public imagery. However, it is understood that these were removed in early 2020 and the site visit confirmed the absence of these trees. No further tree removal works are required, with only minor cutting back of T6 (Cat C Loquat) to safeguard the tree.
- 10.5. The demolition of the existing buildings and construction of the proposed development will take place within the RPA of T2 and T3 (Cat C Sycamore), which are third party trees to be retained.
- 10.6. The report advises that as similar construction has previously occurred within RPA of T3 and that the proposed incursion into T2 RPA would be limited, foundation replacement of these existing areas can be undertaken in a traditional manner, if hand excavated under direct supervision with all works undertaken in line with the supporting Arboricultural Method Statement.
- 10.7. All retained trees would be robustly protected in accordance with necessary tree measures set out in the Arboricultural Method Statement.
- 10.8. The Council's Tree Officer is satisfied that the specified tree protection measures and construction methodology set out in the Statement would minimise the impact of the proposed development on the retained trees. It is recommended that these measures are secured by way of a condition in the event planning permission is granted.
- 10.9. The landscaping plan associated with the application demonstrates that there is opportunity to provide soft landscaping features to the site, including the planting of 22 pleached trees, and further details of these would be secured by condition in the event planning permission is granted. Infill and replacement planting is sufficient to accommodate a well landscaped scheme.

11. Design and Character

- 11.1. Paragraphs 130, 135 and 139 of the NPPF 2024 refer to the need for functional and visually attractive development that is sympathetic to local character and history.
- 11.2. Policy CS5 of the CS requires high quality design that is attractive, relates to local distinctiveness and complements the attractive characteristics of the area.

- 11.3. Policy DM9 of the DMPD requires a positive contribution to and compatibility with the local character and the historic and natural environment and Policy DM10 requires good design that respects, maintains or enhances the prevailing house types and sizes, density, scale, layout, height, form and massing, plot width and building separation, building lines and key features.
- 11.4. Policy DM25 of the DMPD requires the scale, bulk and appearance of the new employment development to be compatible with the character of its surrounding.
- 11.5. The existing commercial buildings on site are of no great architectural merit and there is no objection to their loss in this respect.
- 11.6. The layout of the proposed built form generally reflects the layout of that currently existing, although it makes a more efficient use of the site by extending parallel with the south east and south boundary.
- 11.7. As a result of its backland location behind the more linear development of Reigate Road, the proposed built form does not have to conform to any particular street scene. However, the layout would continue to retain a coherent relationship with the adjoining built form.
- 11.8. The tallest building on the site contains a domed roof that measures 6.2m high. Whilst the design of the proposed built form would introduce an element of two storey scale into the site, the flat roof design would mitigate the overall height, which would be 6.3m. Although this is a minimal increase in height over the existing building on site, the massing at that height would be greater than existing.
- 11.9. Notwithstanding this, the height and massing of the proposed two storey element would not appear incongruous within the surrounding built form environment, which is a mix of single and two storey commercial units and residential development.
- 11.10. The intervening built form and landscaping between the site and Reigate Road would prevent its visibility from this main street scene. Whilst views of the proposed development would be achievable from the adjoining commercial and residential properties, the proposal would replace poor conditioned buildings with high quality built form, thereby resulting in an improvement in visual amenity for the occupiers of these surrounding buildings. A Landscape and Visual Impact Assessment was not required on these grounds.
- 11.11. The proposed development would constitute good design and would not cause material harm to the character and appearance of the area.

12. Neighbour Amenity

- 12.1. Policy CS5 of the CS and Policy DM10 of the DMPD seeks to protect occupant and neighbour amenity, including in terms of privacy, outlook, sunlight/daylight, and noise whilst Paragraph 198 of the NPPF and Policy CS6 of the CS seek to mitigate and reduce noise impacts.
- 12.2. Policy DM25 of the DMPD requires new employment development to not significantly harm the amenities of nearby occupiers nor cause adverse environmental impact on the surrounding area.
- 12.3. The neighbouring residential properties predominantly affected by the proposed development would be April Cottage to the south east of the site and Priestmere Cottage and 1&2 North Looe House, all of which have their far rear curtilage bounding the south west/west of the site.

April Cottage

- 12.4. The front elevation of April Cottage would face the south east boundary of the site. At present, views from April Cottage would be of a single storey built form. The proposed development would extend the single storey built form directly along the shared boundary.
- 12.5. Notwithstanding this, as a result of the topography of the site, the single storey nature of the built form proposed along the boundary, the height of which would fall from 4.2 metres to 2.4 metres on the boundary and a distance of between 9 -11 metres retained between the single storey built form and the front windows associated with April Cottage, Officers are satisfied that the proposal would not create any overbearing impacts or create any issues of loss of light or overshadowing.

Priestmere Cottage

- 12.6. Although the rear curtilage of this neighbouring property bounds the site, much of the proposed built form of the would be at least 17 metres from the shared boundary of this neighbouring property, with 46 metres retained between the proposed built form and the rear elevation of the cottage. This would prevent any overbearing impacts and any issues of loss of light or loss of outlook.
- 12.7. Although the proposed development would introduce two storey windows to the site, because of the retained 46 metre window to window distance, they would not allow for any clear or direct overlooking into the private amenity area and would be filtered by the intervening boundary trees.
- 12.8. The proposed security/plant hut would be located close to the shared boundary of this neighbouring property. Notwithstanding this, because of its 2.5 metre high and given the presence of the 4-metre boundary wall enclosing the far rear curtilage of this neighbouring property, Officers are

satisfied that this single storey structure would not cause any harm to the amenities of the occupier of this neighbouring property.

1&2 North Looe House

- 12.9. The north east boundaries of these properties lie within 8 metres of the proposed single storey built form of the proposed development and 23 metres from the proposed two storey built form, with 49 metres retained between the proposed built form and the rear elevation of these neighbouring properties. This would prevent any overbearing impacts and any issues of loss of light or loss of outlook.
- 12.10. Although the proposed development would introduce two storey windows to the site, as a result of the setback of the first floor from the ground floor of Units 5, 6 and 7, a window to rear boundary distance of 23 metres would be retained, preventing any clear or direct views into the internal amenity areas and far rear private curtilage of these neighbouring properties.
- 12.11. It is noted that 2 North Looe House utilised their far rear curtilage for domestic entertaining and whilst this area lies to adjacent to the site boundary and the occupiers may have a perception of overlooking from the proposed development, given the distance retained between all first floor windows would exceed 21 metres and that the area in question would remain enclosed by the outbuildings associated with this neighbouring property, Officers are satisfied this domestic entertaining area would not be material harmed by overlooking.

Priest Hill Close and The Paddock

- 12.12. Properties in Priest Hill Close lie to the north of the site but are separated by two access roads such that no objection is raised. Similarly, The Paddock, a residential dwelling lies to the north but is separated by another property. No adverse impacts to this property are foreseen.

General Noise

- 12.13. Whilst the proposed development is likely to generate a greater level of vehicular noise through vehicles arriving and leaving the site than the current situation, this level would not be to an extent that would be incongruous, given the existing active use of the site as a commercial use that attracts a similar traffic generation.
- 12.14. Seven vehicle parking spaces would lie to the far rear domestic entertaining area associated with 2 North Looe House. Whilst this is likely to create more noise and disturbance from vehicles in a concentrated area in comparison to the existing situation, the retained outbuildings associated with this neighbouring property would provide some screening properties to this entertaining area and the vehicle movements associated

with the proposed development would not be significantly above and beyond those currently generated by the site.

- 12.15. As the site is an existing employment park, there is a reduction in the number of units on site, and acoustic boundary treatments are conditioned, it is felt unnecessary for any hours of use to be conditioned as the proposed development is acceptable without any such condition.
- 12.16. In the event planning permission is granted, because of the location of the parking bays adjacent to the rear curtilage of 2 North Looe House, Officers would secure appropriate acoustic boundary screening along this boundary.
- 12.17. The construction phase of the development has the potential to cause disruption and inconvenience to nearby occupiers and users of the local highway network. However, these issues are transient and can be minimised through the requirement of planning conditions in the event planning permission is granted.

13. Highway and Transport Impacts

- 13.1. The NPPF requires new development to use a vision led approach to identify transport solutions that deliver well designed, sustainable, and popular places.
- 13.2. Paragraph 116 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios
- 13.3. Policy CS16 of the CS encourages an improved and integrated transport network and facilitates a shift of emphasis to non-car modes as a means of access to services and facilities. Development proposals should provide safe, convenient, and attractive accesses for all, be appropriate for the highways network, provide appropriate and effective parking provision, both on and off-site and ensure that vehicular traffic generated does not create new, or exacerbate existing, on street parking problems, nor materially increase other traffic problems.
- 13.4. Policy DM25 of the DMPD requires new employment development to comply with the Council's transport, access, servicing, car and cycle parking standards and policies.
- 13.5. Policy DM35 of the DMPD requires sets out that the impact of new development on the transport network will be assessed against other plan policies and transport standards via a Transport Assessment or Statement.

13.6. The application is supported by a Transport Assessment (TA), prepared by Transport Dynamics, reference PCD-685-EN-RP-01 and dated July 2025 and subsequent Technical Response (TR1), prepared by Transport Dynamic and dated November 2025 and Technical Response (TR2), prepared by Transport Dynamic and dated December 2025. The County Highway Authority are satisfied that the TA gives a fair representation of the site and the surrounding local highway network.

13.7. Pedestrian and Vehicle Access

13.8. Paragraph 115 of the NPPF requires safe and suitable access to the site for all users whilst paragraph 117 of the NPPF seeks to minimise conflicts between pedestrians, cyclists, and vehicles.

13.9. The site is served by a vehicle access from Reigate Road, shared with pedestrian access.

13.10. The proposal would involve the provision of a segregated pedestrian 1.2 metre footpath along the access to the site to facilitate safe access for pedestrians. The County Highway Officer is satisfied that the access to the site can accommodate the provision of the segregated pedestrian footpath in combination with a single vehicle and thus this represents a net improvement.

13.11. The swept path drawing supporting this application demonstrate that two vehicles, including lorries, can pass at the existing access, to prevent any delays from vehicles on Reigate Road waiting for vehicles to exist the access before they can turn in. The County Highway Officer is satisfied that the swept path diagrams demonstrate that the proposed development would not compromise the safe operation of the existing highway.

13.12. Traffic Generation

13.13. To assess the trip generation associated with the existing site, the TR2 contains independent traffic surveys undertaken at the site, which were carried out on weekdays during early December 2025. The existing traffic survey identified 15 inbound and 14 outbound vehicle movements on the busier day of the traffic surveys with no vehicle movements in the AM peak and 1 inbound and 1 outbound movement in the PM peak.

13.14. In considering the future traffic movements associated with the proposed development, the TRICS database has been consulted, using data associated with similar development scenarios. The TRICS data set out in the TR2 calculates the proposal development generating 27 inbound and 24 outbound vehicle movements and increase in 9 movements inbound and 13 movements outbound.

13.15. The County Highway Authority is satisfied that the TRICS assessment provides a robust and realistic assessment of the impact of the proposed development on the highway network, and that the residual cumulative

impacts of the development would not have a material impact on the capacity of the surrounding network.

13.16. Car Parking

13.17. Policy DM37 of the DMPD requires parking for commercial development to be in accordance with the Surrey County Council Vehicular, Electric Vehicle and Cycle Parking.

13.18. For the mixed commercial floorspace identified, the proposed development would be expected to provide a maximum of 20 vehicle parking spaces and three lorry spaces within the site.

13.19. The proposed development would provide 16 parking spaces within the site, thereby meeting the requirements of the Surrey Parking Guidance and subsequently Policy DM37 of the DMPD.

13.20. Cycle Parking

13.21. Policy DM36 of the DMPD requires the provision of cycle networks and facilities and Policy DM37 requires minimum provision of six cycle spaces as set out in Annexe 2 - Parking Standards for new development.

13.22. The proposal would provide 18 cycle parking spaces, which would exceed the County guidance.

13.23. Electric Vehicle Charging

13.24. The proposal would provide 50% of the proposed vehicle parking spaces with Electric Vehicle Charging Points. The County Highway Authority are satisfied that this level of charging points makes suitable provision for encouraging sustainable travel. This provision would be secured by way of a condition if planning permission is granted.

13.25. Disabled parking

13.26. The proposed parking provision on site includes an accessible parking space, which exceeds the County guidance of allocating at least 5% of total parking spaces for disabled users. This provision would be secured by way of a condition if planning permission is granted.

13.27. Sustainability Measures

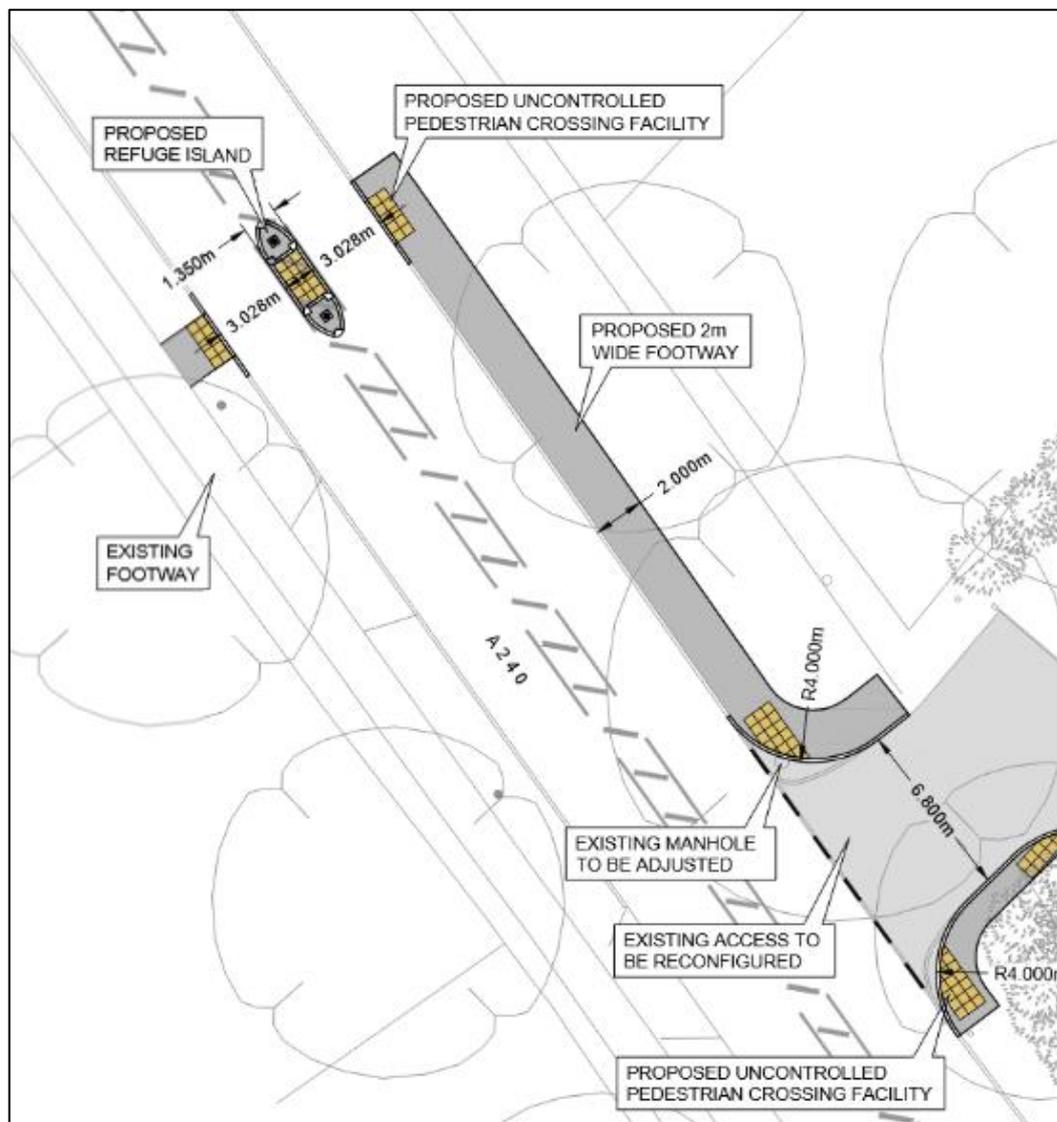
13.28. Paragraph 110 of the NPPF seeks new development to take opportunities to maximise sustainable transport solutions and therefore sustainability opportunities have been set out in TR1 to promote sustainable travel modes.

13.29. It is important to recognise that these improvements are proposed to enhance sustainability, rather than make the location sustainable, as the

site is already to be considered in a sustainable location for the reasons set out in the Green Belt section of this Agenda Report.

13.30. The proposed development would secure the following pedestrian improvements to Reigate Road:

- A pedestrian crossing with dropped kerbs and tactile paving at the existing access to site
- A pedestrian refuge to directly link to the footpath on the south side of Reigate Road
- Provision of 1.2 metre pedestrian footpath extending from the access along the north side of Reigate Road to link to the pedestrian refuge



13.31. The pedestrian improvements works will be secured through a condition in the event permission is granted.

14. Ecology and Biodiversity

14.1. Ecological Impact

- 14.2. Paragraphs 187 and 193 of the NPPF, Policy CS3 of the CS and Policy DM4 of the DMPD require the conservation and enhancement of on-site biodiversity, with minimisation of impacts and the provision of mitigation measures.
- 14.3. The duty of care extends to Regulation 9(3) of the Conservation of Habitats and Species Regulations 2017 to protect species identified under Schedule 5 of the Wildlife and Countryside Act 1981 and Schedule 2 of the Conservation of Habitats and Species Regulations 2017.
- 14.4. The application is supported by a Preliminary Ecological Appraisal Report, prepared by Southwest Environmental Limited, reference S24-130/PEA, dated January 2025 which demonstrates to the satisfaction of the Council's Ecologist that the site has low ecological value and that following the Preliminary Protected Species Assessment contained within the report, no further ecological surveys are required.
- 14.5. The Council's Ecologist is satisfied that the Ecological Appraisal has demonstrated that the proposal would not cause harm to protected species and provides sufficient mitigation and ecological enhancements which will be secured by a condition in the event permission is granted.
- 14.6. On this basis, Officers are satisfied that the proposal would not adversely affect the ecological significance of the site, and no objection is raised. 1981 and Schedule 2 of the Conservation of Habitats and Species Regulations 2017.

14.7. Biodiversity Net Gain

- 14.8. Schedule 7A of the Town and Country Planning Act 1990 and Section 13 of the NPPF require delivery of biodiversity net gain (BNG), the former requiring a minimum of 10% to be achieved by establishing coherent ecological networks that are more resilient to current and future pressures with the overall intention to deliver a more or better quality natural habitat than there was before development.
- 14.9. The application was accompanied by a Biodiversity Net Gain Report prepared by Southwest Environmental Limited, reference S24-130/BNG and dated June 2025
- 14.10. The Biodiversity Impact Calculation demonstrates that the proposed development would create an onsite BNG increase of 0.2479 habitat units (12%) exceeding the national requirements.
- 14.11. This net gain would be delivered through a comprehensive landscaping scheme. In the event permission is granted, delivery of the BNG and

monitoring provisions will form part of a Habitat Management and Monitoring Plan, which would be secured by a condition in the event permission is granted.

- 14.12. A legal agreement would also be required to secure the BNG monitoring fee.

15. Flooding and Drainage

15.1. Flood Risk and Vulnerability

- 15.2. Paragraphs 170 and 181 of the NPPF Policy CS6 of the CS and Policy DM19 of the DMPD state that Inappropriate development in areas at risk of flooding development at medium or high risk from flooding must ensure that there is no increase in flood risk, whether on or off site, and implementation of flood resilience and mitigation to reduce it to acceptable levels.

- 15.3. The application is supported by a Drainage Strategy Report, prepared by RDC and dated July 2025.

- 15.4. In terms of fluvial flooding, the site is in an area of low flood risk, outside of Flood Zone 2 and 3 as identified on the Environment Agency Flood Risk Maps and therefore the proposed development would be wholly located in Flood Zone 1. As such the development has low risk of fluvial flooding.

- 15.5. As the proposed development would lie within Flood Zone 1, neither the sequential test nor the exceptions test, as set out in the Government's guidance 'Flood risk assessment: the sequential test for applicants' 2017 needs to be carried out.

- 15.6. In respect of pluvial flooding, the junction to the site and a small part of the access lies within the Epsom and Ewell designated Critical Drainage Area and at risk of surface water flooding. However, as the access lies outside of the developable area of the site, neither the sequential test nor the exceptions test, as set out in the Government's guidance 'Flood risk assessment: the sequential test for applicants' 2017 needs to be carried out

15.7. Sustainable Drainage

- 15.8. Paragraphs 181 and 182 of the NPPF, Policy CS6 of the CS 2007 and Policy DM19 of the DMPD seek the implementation of sustainable urban drainage systems (SuDS).

- 15.9. Accompanying the supporting Drainage Strategy Report is a Drainage Layout Plan (1111-2534-CIV-10 Rev P2)

- 15.10. To mitigate surface water flooding to and from the site, the supporting Drainage Strategy Report considers the most appropriate SuDS methods to be infiltration of surface water into a stormwater vortex separator to improve water quality, before discharging into a cellular storage tank soakaway.
- 15.11. The Lead Local Flood Authority have confirmed that the outline drainage proposal satisfies the requirements of the NPPF and has recommended a suitable condition to secure the details of the design of the surface water drainage scheme and to ensure that it is properly implemented and maintained throughout the lifetime of the development in the event permission is granted.

16. Contamination and Remediation

- 16.1. Paragraph 196 of the NPPF and Policy DM17 of the DMPD require planning decisions to ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.
- 16.2. The Council's Land Contamination Officer has reviewed this application and has highlighted that there used to be depot on site and an 'architectural salvage', along with a petrol tank. The occupier of 2 North Looe House has also mentioned the possibility of asbestos in the buildings to be demolished on site. The site is also underlain by a chalk aquifer.
- 16.3. There is no identified contamination harm that would prevent redevelopment of the site. For the reasons outlined above, in the event planning permission is granted, the Council's Land Contamination recommend a ground contamination investigation following the demolition of buildings on site, due to the potential for there to be asbestos in the buildings.
- 16.4. These conditions would ensure that risks from land contamination to future users of the land and neighbouring land are minimised, together with those to controlled waters, property, and ecological systems and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors.

17. Environmental Sustainability

- 17.1. Policy CS6 of the CS stipulates that development should incorporate sustainable development and reduce, or have a neutral impact upon, pollution and climate change. This includes incorporation of renewable energy, use of sustainable construction methods and sustainable building design, flood management, reduction in water use and improvement of water quality and minimisation of noise, water, and light pollution.

- 17.2. The application is supported by an Energy Statement, prepared by Focus 360, Rev 2 and dated July 2025. This statement provides a detailed assessment of the predicted regulated energy demand and CO₂ emissions associated with the development.
- 17.3. It highlights the energy-efficient building fabric specification, as well as the integration of low-carbon technologies such as air source heat pumps (ASHPs) for the heated office areas, and roof-mounted photovoltaic (PV) panels to generate on-site renewable electricity.
- 17.4. The use of PV panels on the main roof helps offset electricity demands from the ASHPs and contributes to broader carbon reduction goals by utilising solar energy directly.
- 17.5. A technical assessment has been undertaken using Simplified Building Energy Model, in line with Part L2A of the Building Regulations. The results indicate that the proposed development would achieve a notable improvement over the notional baseline through a combination of fabric-first measures and efficient services design.
- 17.6. In addition to energy efficiency, the proposed development would utilise water conservation measures, including low-flow sanitary fittings to reduce mains water demand across the site.
- 17.7. The statement also demonstrates that the proposed development has been designed to exceed current energy performance standards while supporting wider environmental targets relating to climate change and resource efficiency. All proposed units are designed to achieve an 'A' Energy Performance Certificate (EPC).
- 17.8. In the event permission is granted, these sustainable design measures would be secured by way of a condition.

18. Accessibility and Equality

- 18.1. Policy CS16 of the CS and Policy DM12 of the DMPD requires safe, convenient, and attractive access to be incorporated within the design of the development.
- 18.2. The supporting Design and Access Statement, prepared by Addo, reference ADL-25-761-D01 rev A and dated June 2025 confirms that the proposed commercial units would have direct and level access from the main parking area and that all commercial units would have disabled and standard access toilets.
- 18.3. Furthermore, the proposed parking provision on site includes an accessible parking space, which exceeds the County guidance of allocating at least 5% of total parking spaces for disabled users.

- 18.4. The Council is required to have regard to its obligations under the Equality Act 2010, including protected characteristics of age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion, or belief. There are no identified characteristics that would be disadvantaged by the proposal.

19. Planning Obligations and Community Infrastructure Levy

- 19.1. Paragraphs 55 and 57 of the NPPF 2024 requires consideration of whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations, but only where they are necessary, related to the development, fair and reasonable.
- 19.2. Policy CS12 of the CS and the Developer Contributions SPD require that development must be able to demonstrate that the service and community infrastructure necessary to serve the development is available, either through on-site provision or a financial contribution via a planning obligation.
- 19.3. The Community Infrastructure Levy Charging Schedule 2014 indicates that the application is chargeable for CIL payments because it involves additional floor area in excess of 100m². It is payable at £125/m² index linked.

CONCLUSION

20. Planning Balance

- 20.1. Section 2 of the NPPF has an underlying presumption in favour of sustainable development which is carried through to the Development Plan. Policy CS1 of the CS expects development to contribute positively to the social, economic, and environmental improvements in achieving sustainable development whilst protecting and enhancing the natural and built environment.
- 20.2. The site is located within the Green Belt which is identified as a protected area/asset of particular importance. The proposed development complies with the relevant requirements of paragraph 155 of the NPPF and therefore not inappropriate development.

20.3. Economic Considerations

- 20.4. The proposed development would make a small contribution towards delivering an existing unmet need for industrial floorspace. As a result of the scale of the floor area, this benefit is given **limited weight** in the planning balance.

20.5. Social Considerations

20.6. The proposed development would deliver pedestrian improvements to Reigate Road that would be a public benefit. This benefit is given **limited weight** in the planning balance.

20.7. Environmental Considerations

20.8. The proposed development would increase the biodiversity value of the site, retaining existing ecological features and creating new biodiversity rich habitats, resulting in a biodiversity net gain of 12% for habitat units, which represents an excess gain above the mandatory requirement of 10%. There would also be net improvements to landscaping on site. Given the excess provision above the national minimum requirement and additional planting, this benefit is given **limited weight** in the planning balance.

20.9. Conclusion

20.10. The policies of the NPPF that protect areas or assets of particular importance do not provide a strong reason for refusing the development proposed. Whilst the Council does not have up-to-date development plan due to expiration, Officers are satisfied that the policies contained within that are relevant to this application remain consistent with the NPPF and can be given weight accordingly.

20.11. Officers conclude that in applying the planning balance, there would be no harm associated with the development that would outweigh the limited benefits, when assessed against the policies in the Framework taken as a whole, or where specific policies in the Framework indicate that development should be restricted. Approval of the application is recommended.

RECOMMENDATION

PART A

To grant planning permission subject to a Unilateral Undertaking with the following Heads of Terms:

a) BNG delivery and monitoring

and the following conditions and informatives

PART B

If the Unilateral Undertaking referred to in Part A is not completed by 26 May 2026, the Head of Place Development is authorised to refuse the application for the following reason:

In the absence of a completed legal obligation to secure appropriate BNG delivery and monitoring, the applicant has failed to comply with Schedule 7A of the Town and Country Planning Act 1990, Section 13 of the NPPF require delivery of biodiversity net gain Policy CS3 of the CS and Policy DM4 of the DMPD

CONDITIONS

1) Timescale

The development hereby permitted shall be commenced within three years from the date of this decision.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).

2) Approved Plans

Unless otherwise agreed in writing by the local planning authority, the development hereby permitted shall be carried out in accordance with the following plans:

2431_P01 Rev C Existing Location Plan
2431_P01.1 Rev C Existing Location Plan
2431_P01.2 Rev C Existing Location Plan
2431_P102 Rev D Proposed Site Plan
2431_P103 Rev D Proposed Site Plan
2431_P104 Rev A Proposed Site Lines
2431_P110 Rev K Proposed GA Plan
2431_P111 Rev H Proposed Ground Floor
2431_P112 Rev C Proposed First Floor GA
2431_P112.1 Rev C Proposed First Floor
2431_P115 Rev D Prop Landscape Plan
2431_P221 Rev D Prop Long Elevations
2431_P222 Rev C Prop Elevations Sht3
2431_P222.2 Rev C Comparison Elevations
2431_P222.3 Rev B Elevation E1
2431_P223 Rev B Proposed Elevation 4
PDC685/002 Rev A Proposed Highway Works

Reason: For avoidance of doubt and to ensure that the development is carried out in accordance with the approved plans to comply with Policy CS5 of the Core Strategy 2007.

Pre Commencement Conditions

3) Materials

No development shall commence unless and until details of external materials for the development, including for boundary treatments, shall be submitted to and approved

in writing by the Local Planning Authority. The development shall be carried out in full accordance with the approved details.

Reason: To ensure a satisfactory external appearance in accordance with Policy CS5 of the Core Strategy 2007 and Policies DM9 and DM10 of the Development Management Policies Document 2015.

4) Construction Transport Management Plan

No development shall commence until a Construction Transport Management Plan, to include details of:

- (a) parking for vehicles of site personnel, operatives and visitors
- (b) loading and unloading of plant and materials
- (c) storage of plant and materials
- (d) programme of works (including measures for traffic management)
- (e) provision of boundary hoarding behind any visibility zones
- (f) measures to prevent the deposit of materials on the highway and transfer of dust contaminants from the site
- (g) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused
- (h) on-site turning for construction vehicles
- (i) hours of works and deliveries

has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

Reason: For the development not to prejudice highway safety nor cause inconvenience to other highway users in accordance with Section 9 of the NPPF 2024 and to satisfy policies DM35 and DM36 of the Development Management Policies Document 2015 and Policy CS16 of the Core Strategy 2007.

5) Surface Water Drainage

No development shall commence until a surface water drainage scheme has been submitted to and approved in writing by the Local Planning Authority. The final solution should follow the principles set out in the approved drainage strategy. The design must satisfy the SuDS Hierarchy and be compliant with the national standards for sustainable drainage systems and the NPPF.

The required drainage details shall include:

- a) The results of infiltration testing completed in accordance with BRE Digest: 365 and
- b) confirmation of groundwater levels. Where infiltration is proposed confirmation is required of a 1m unsaturated zone from the base of any proposed soakaway to the seasonal high groundwater level and confirmation of half-drain times.
- c) Hydraulic calculations to demonstrate the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+40%

- allowance for climate change) storm events. If infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate equivalent to the pre-development Greenfield run-off
- d) Detailed design drawings for all sustainable drainage elements including cross sections and detailed drainage layout plan.
 - e) An exceedance flow routing plan demonstrating no increase in surface water flood risk on or off site. The plan must include proposed levels and flow directions.
 - f) Details of how surface water will be managed during construction including measures to protect on site and downstream systems prior to the final drainage system being operational.

The development shall be carried out in full accordance with the approved details prior to first occupation.

Reason: To ensure that the principles of sustainable drainage are incorporated into the development and to reduce the impact of flooding in accordance with Policy CS6 of the Epsom and Ewell Core Strategy 2007 and Policy DM19 of the Development Management Policies 2015.

6) Site Waste Management Plan

No development shall commence until a Site Waste Management Plan to has been submitted to and approved in writing by the Local Planning Authority. The Site Waste Management Plan shall demonstrate that the Construction, Demolition and Excavation waste arising from the development is limited to the minimum quantity necessary and opportunities for re-use and recycling of Construction, Demolition and Excavation waste and residues are maximised, and that the development includes adequate facilities for waste storage and recycling which should be maintained and managed for the life of the development.

The development shall be carried out in full accordance with the approved details and prior to the first occupation of the development hereby permitted.

Reason: To ensure sustainable construction and waste management in new development, in accordance with Policy 4 of the Surrey Waste Local Plan 2020 and the requirements of paragraph 8 of the National Planning Policy for Waste 2014

Post Demolition Condition

7) Ground Contamination

Following any demolition and prior to the commencement of any further development, the following shall be undertaken in accordance with current best practice guidance:

- (i) a desk study, site investigation and risk assessment to determine the existence, extent and concentrations of any made ground/fill, ground gas (including hydrocarbons) and contaminants (including asbestos) with the potential to impact sensitive receptors on and off-site. The results of the investigation and

- risk assessment shall be submitted to and approved by the Local Planning Authority; and
- (ii) if ground/groundwater contamination, filled ground and/or ground gas is found to present unacceptable risks, a detailed scheme of risk management measures shall be designed and submitted to the Local Planning Authority for approval.

The development shall be carried out in full accordance with the approved details and prior to the first occupation of the development hereby permitted.

Prior to any occupation of the site, the approved remediation scheme must be carried out in accordance with its terms. Following completion, a verification report that demonstrates the effectiveness of the remediation carried out must be produced and is subject to the approval in writing of the Local Planning Authority.

Reason: To control significant harm from land contamination to human beings, controlled waters, buildings and ecosystems as required by Policy DM10 of the Development Management Policies Document 2015.

8) Habitat Management and Monitoring Plan

No development above shall commence unless and until a Habitat Management and Monitoring Plan (HMMP), prepared in accordance with the approved statutory biodiversity gain plan has been submitted to, and approved in writing, by the Local Planning Authority and including:

- a) A non-technical summary;
- b) The roles and responsibilities of the people or organisation(s) delivering the HMMP;
- c) The planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved statutory biodiversity gain plan;
- d) The management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- e) The monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the Local Planning Authority.

No occupation shall take place until the habitat creation and enhancement work set out in the approved HMMP have been completed; and a completion report, evidencing the completed habitat enhancements, has been submitted to, and approved in writing by the Local Planning Authority.

Notice in writing shall be given to the Council when the HMMP works have started. The created and/or enhanced habitat specified in the approved HMPP shall be managed and maintained in accordance with the approved HMMP.

Reason: To ensure that the development results in a biodiversity net gain which meets national standards, in accordance with Schedule 7A of the Town and Country

Planning Act 1990, Section 180 of the National Planning Policy Framework 2024 and Policy DM4 of the Development Management Policies Document 2015.

Above Ground Level Conditions

9) Boundary Treatment

No development above ground level shall take place until details of boundary treatments, to include an acoustic fence along the boundary with 2 North Looe House, has been submitted to and approved in writing by the Local Planning Authority. The boundary treatments shall be implemented in accordance with the approved details prior to first occupation of the development hereby permitted.

Reason: To safeguard the amenities of the occupiers of neighbouring properties in accordance with Policy DM10 of the Development Management Policies Document 2015.

Pre-Occupation Conditions

10) Modified Access

No part of the development shall be first occupied until the proposed modified access to Reigate Road has been constructed and provided with a means within the private land of preventing private water from entering the highway.

Reason: For the development not to prejudice highway safety nor cause inconvenience to other highway users in accordance with Section 9 of the NPPF 2024 and to satisfy policies DM35 and DM36 of the Development Management Policies Document 2015 and Policy CS16 of the Core Strategy 2007.

11) Pedestrian Access Arrangements

No part of the development shall be first occupied until the following facilities have been provided in accordance with the approved plans for:

- a) Providing safe routes for pedestrians to travel between the western footway on Reigate Road and the development site.
- b) The improvement of the pedestrian crossing facilities on Reigate Road to include provision of a pedestrian refuge.
- c) Provision of a footway along the private access road

The approved pedestrian access arrangements shall be installed prior to first occupation of the development and thereafter retained and maintained to the satisfaction of the Local Planning Authority.

Reason: For the development not to prejudice highway safety nor cause inconvenience to other highway users in accordance with Section 9 of the NPPF 2024 and to satisfy policies DM35 and DM36 of the Development Management Policies Document 2015 and Policy CS16 of the Core Strategy 2007.

12) Vehicle Parking

No part of the development shall be first occupied until space has been laid out within the site in accordance with the approved plans for vehicles to be parked, including the provision of disabled parking. Thereafter the parking areas shall be retained and maintained for their designated purposes.

Reason: For the development not to prejudice highway safety nor cause inconvenience to other highway users in accordance with Section 9 of the NPPF 2024 and to satisfy policies DM35 and DM36 of the Development Management Policies Document 2015 and Policy CS16 of the Core Strategy 2007.

13) Electric Vehicle Charging Points

No part of the development shall be first occupied until at least 50% of all available parking spaces are provided with a fast-charge Electric Vehicle charging point (current minimum requirements – 7.4 kw Mode 3 with Type 2 connector -230v AC 32Amp single phase dedicated supply) and thereafter retained and maintained to the satisfaction of the Local Planning Authority.

Reason: In recognition of Section 9 of the NPPF 2024 and in meeting its objectives as well as and to satisfy policies DM35 and DM36 of the Development Management Policies Document 2015.

14) Cycle Parking and E-Bikes

No part of the development shall be first occupied until details of the following cycling facilities have been submitted to and approved by the Local Planning Authority

- a) High quality, secure, lit and covered cycle parking
- b) A minimum of 20% of spaces provided with charging points with timers for e-bikes within said facilities;
- c) Clear hardstanding routes between the cycle stores and the site access and;
- d) (20% of all bikes (including disabled and adaptive cycles) within communal storage areas should be able to be charged at any one time.

The development shall be carried out in full accordance with the approved details prior to first occupation of the proposed development and thereafter retained and maintained to the satisfaction of the Local Planning Authority.

Reason: In recognition of Section 9 of the NPPF 2024 and in meeting its objectives as well as and to satisfy policies DM35 and DM36 of the Development Management Policies Document 2015.

15) Suds Verification Report

The development hereby approved shall not be first occupied unless and until details a verification report must be submitted to and approved by the Local Planning Authority. This must demonstrate that the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), confirming

any defects have been rectified, provide the details of any management company and provide an 'As-Built' drainage layout and state the national grid reference of key drainage elements.

Reason: To ensure that the principles of sustainable drainage are incorporated into the development and to reduce the impact of flooding in accordance with Policy CS6 of the Epsom and Ewell Core Strategy 2007 and Policy DM19 of the Development Management Policies 2015.

16) Hard and Soft Landscaping

No part of the development shall be first occupied until a scheme of hard and soft landscaping has been submitted to the Local Planning Authority for approval. The scheme shall indicate the location and species of plants and trees to be planted.

The approved hard landscaping shall be implemented prior to the occupation of the development hereby approved and thereafter retained. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the buildings or the completion of the development, whichever is the sooner; and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.

Reason: To ensure the provision, establishment and maintenance of an appropriate landscape scheme in the interests of the visual amenities of the locality in accordance with Policy CS5 of the Core Strategy 2007 and Policies DM5 and DM9 of the Development Management Policies 2015.

Compliance Conditions

17) Biodiversity Net Gain Plan

The statutory Biodiversity Net Gain Plan shall be prepared in accordance with the details set out in the Biodiversity Net Gain Report prepared by Southwest Environmental Limited, reference S24-130/BNG and dated June 2025.

Reason: To ensure that the development results in a biodiversity net gain which meets national standards, in accordance with Schedule 7A of the Town and Country Planning Act 1990, Section 180 of the National Planning Policy Framework 2024 and Policy DM4 of the Development Management Policies Document 2015.

18) Monitoring of HMMP

HMMP monitoring reports shall be submitted to Local Planning Authority in writing in accordance with the methodology and frequency specified in the approved HMMP in Condition 8.

Reason: To ensure that the development results in a biodiversity net gain which meets national standards, in accordance with Schedule 7A of the Town and Country

Planning Act 1990, Section 180 of the National Planning Policy Framework 2024 and Policy DM4 of the Development Management Policies Document 2015.

19) Compliance with Arboricultural Impact Assessment and Tree Protection

The development hereby permitted shall be carried out in strict accordance with all the demolition and construction methods, tree protection and site monitoring and supervision as set out in the Arboricultural Planning and Survey Report, prepared by Graftin Gardeners Ltd, reference 25 0004 The Looe and dated 21 June 2025

Reason: To protect the trees adjacent to the site which are to be retained in the interests of the visual amenities of the locality in accordance with Policy CS5 of the Core Strategy 2007 and Policies DM5 and DM9 of the Development Management Policies 2015.

20) Compliance with Sustainable Design Measures

The development hereby permitted shall be carried out in strict accordance with the sustainable design measures contained in the Energy Statement, prepared by Focus 360, Rev 2 and dated July 2025. All measures shall be implemented prior to first occupation of the development hereby permitted and thereafter maintained.

Reason: To ensure that measures to make the development sustainable and efficient in the use of energy, water and materials are included in the development in accordance with Policy CS6 of the Core Strategy 2007.

21) Compliance with Ecological Survey

The development hereby permitted shall be carried out in strict accordance with the ecological recommendations and enhancement measures set out in the Preliminary Ecological Appraisal Report, prepared by Southwest Environmental Limited, reference S24-130/PEA, dated January 2025. All ecological enhancement measures shall be implemented prior to first occupation of the development hereby permitted and thereafter maintained.

Reason: To enhance biodiversity and habitats in accordance with Policy CS3 of the Core Strategy

22) Unexpected Contamination

If contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. In that event, an investigation and risk assessment must be undertaken and where remediation is deemed necessary a remediation scheme must be prepared which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority.

Reason: To control significant harm from land contamination to human beings, controlled waters, buildings and ecosystems as required by Policy DM10 of the Development Management Policies Document 2015.

INFORMATIVES

1) Positive and Proactive Discussion

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies in the Core Strategy, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

2) Building Control

Your attention is drawn to the need to comply with the relevant provisions of the Building Regulations, the Building Acts and other related legislation. These cover such works as the demolition of existing buildings, the erection of a new building or structure, the extension or alteration to a building, change of use of buildings, installation of services, underpinning works, and fire safety/means of escape works. Notice of intention to demolish existing buildings must be given to the Council's Building Control Service at least 6 weeks before work starts. A completed application form together with detailed plans must be submitted for approval before any building work is commenced.

3) Working Hours

When undertaking building work, please be considerate to your neighbours and do not undertake work before 8am or after 6pm Monday to Friday, before 8am or after 1pm on a Saturday or at any time on Sundays or Bank Holidays. Furthermore, please ensure that all vehicles associated with the construction of the development hereby approved are properly washed and cleaned to prevent the passage of mud and dirt onto the adjoining highway.

You are advised that the Council does have formal powers to control noise and nuisance under The Control of Pollution Act 1974, the Clean Air Acts and other relevant legislation. For further information and advice, please contact - Environmental Health Department Pollution Section

4) Burning of Material

No burning of materials obtained by site clearance shall be carried out on the site.

5) Control of Dust

During demolition or construction phases, adequate control precautions should be taken to control the spread of dust on the site, to prevent a nuisance to residents in the locality. This may involve the use of dust screens and importing a water supply to wet areas of the site to inhibit dust.

6) Asbestos

The site should be assessed for any asbestos containing materials prior to any works of demolition or conversion. Any work with asbestos must be carried out in accordance with the Control of Asbestos Regulations (2012) and relevant Approved Code of Practice <http://www.hse.gov.uk/pubns/books/l143.htm>.

7) Pre Commencement Conditions

The applicant is reminded that this approval is granted subject to conditions which must be complied with prior to the development starting on site. Commencement of the development without complying with the pre-commencement requirements may be outside the terms of this permission and liable to enforcement action. The information required should be formally submitted to the Council for consideration with the relevant fee. Once the details have been approved in writing the development should be carried out only in accordance with those details. If this is not clear, please contact the case officer to discuss.

8) Protected Species

The applicant is reminded that it is an offence to disturb protected species under the Wildlife and Countryside Act 1981. Should a protected species be found during the works, the applicant should stop work and contact Natural England for further advice on 0845 600 3078.

This includes bats and Great Crested Newts, which are a protected species under the Conservation of Habitats and Species Regulations 2017 (as amended). Should any bats or evidence of bats be found prior to or during the development, all works must stop immediately, and an ecological consultant contacted for further advice before works can proceed. All contractors working on site should be made aware of the advice and provided with the contact details of a relevant ecological consultant.

9) Breeding Birds

Under the Wildlife and Countryside Act 1981, it is illegal to intentionally destroy or disturb active bird nests, eggs, or young. Vegetation clearance and demolition shall not be carried out during bird breeding season (1 March to 31 August). If it is necessary for these works to occur between 1 March - 31 August, then a qualified ecologist must survey the site for nesting birds. If a nest is found, a buffer zone must be established and works suspended in that area until the chicks have fledged.

10) Biodiversity Net Gain

The applicant is reminded of their obligations to deliver mandatory biodiversity net gain on-site in accordance with Schedule 7A of the Town and Country Planning Act

1990, including (a) submitting a Biodiversity Gain Plan that accords with the National Planning Practice Guidance and the approved BNG Assessment and Metric Tool; and (b) not operating prior to a completion report being agreed by the local planning authority.

11) Wheel Washing

Adequate precautions shall be taken during the construction period to prevent the deposit of mud and similar debris on adjacent highways. The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning, or repairing highway surfaces and prosecutes persistent offenders (Sections 131, 148 and 149 of the Highways Act 1980).

12) Design Works to the Highway

The developer is advised that as part of the detailed design of the highway works required by the above condition(s), the County Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment.

13) Damage to Highway

Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant/organisation responsible for the damage.

14) Safe Operation of Construction Traffic

The applicant is expected to ensure the safe operation of all construction traffic to prevent unnecessary disturbance obstruction and inconvenience to other highway users. Care should be taken to ensure that the waiting, parking, loading and unloading of construction vehicles does not hinder the free flow of any carriageway, footway, bridleway, footpath, cycle route, right of way or private driveway or entrance. The developer is also expected to require their contractors to sign up to the "Considerate Constructors Scheme" Code of Practice, (www.ccscheme.org.uk) and to follow this throughout the period of construction within the site, and within adjacent areas such as on the adjoining public highway and other areas of public realm.

15) Highway Infrastructure

The applicant is advised that any alterations to existing highway infrastructure should be designed so there is no adverse effect on surface water flow routes and should not increase flood risk on or off site. It is possible to check the long-term flood risk on the following Government website www.gov.uk/check-long-term-flood-risk.

For further information please contact the Flood Risk, Planning and Consenting Team suds@surreycc.gov.uk

16) Works to the Highway

The permission hereby granted shall not be construed as authority to carry out any works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway or any works that may affect a drainage channel/culvert or water course. In instances where the applicant is not the Highway Authority the applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway.

All works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see <http://www.surreycc.gov.uk/roads-and-transport/permits-and-licences/traffic-management-permit-scheme>. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice.

17) Electric Vehicle Charging Points

It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Electric Vehicle Charging Points shall be provided in accordance with the Surrey County Council Vehicular, Cycle and Electric Vehicle Parking Guidance for New Development 2024. Where undercover parking areas (multi-storey car parks, basement or undercroft parking) are proposed, the developer and LPA should liaise with Building Control Teams and the Local Fire Service to understand any additional requirements. If an active connection costs on average more than £3600 to install, the developer must provide cabling (defined as a 'cabled route' within the 2022 Building Regulations) and two formal quotes from the distribution network operator showing this.

18) Electric Bike Charging Points

It is the responsibility of the developer to provide e-bike charging points with socket timers to prevent them constantly drawing a current over night or for longer than required. Signage should be considered regarding damaged or shock impacted batteries, indicating that these should not be used/charged. The design of communal bike areas should consider fire spread and there should be detection in areas where charging takes place. With regard to an e-bike socket in [a domestic dwelling, the residence should have detection, and an official e-bike charger should be used. Guidance on detection can be found in BS 5839-6 for fire detection and fire alarm systems in both new and existing domestic premises / in non-domestic buildings the

premises should have detection, and an official e-bike charger should be used. Guidance on detection can be found in BS 5839-1 of the code of practice for designing, installing, commissioning, and maintaining fire detection and alarm systems in non-domestic buildings.

19) Surface Water Flow Routes

The applicant is advised that any alterations to existing highway infrastructure should be designed so there is no adverse effect on surface water flow routes and should not increase flood risk on or off site. It is possible to check the long-term flood risk on the following Government website www.gov.uk/check-long-term-flood-risk.

20) Source Protection Zone Infiltration

If proposed works result in infiltration of surface water to ground within a Source Protection Zone, the Environment Agency will require proof of surface water treatment to achieve water quality standards.

21) Changes to the Approved Plans

Should there be any change from the approved drawings during the build of the development, this may require a fresh planning application if the changes differ materially from the approved details. Non-material changes may be formalised by way of an application under s.96A Town and Country Planning Act 1990.

22) CIL Liable Development

This form of development is considered liable for the Community Infrastructure Levy (CIL). CIL is a non-negotiable charge on new developments which involve the creation of 100m² or more of gross internal floorspace or involve the creation of a new dwelling, even when this is below 100m². The levy is charged at £125/m², index linked and is charged on the net additional floorspace generated by a development.

The Liability Notice issued by Epsom and Ewell Borough Council will state the current chargeable amount. A revised Liability Notice will be issued if this amount changes. Anyone can formally assume liability to pay, but if no one does so then liability will rest with the landowner.

A Commencement Notice must be submitted to the local planning authority prior to the commencement of development to ensure compliance with the Community Infrastructure Levy Regulations.

23) Legal Agreement

This permission should be read in conjunction with the legal agreement dated TBC, the obligations in which relate to this development.