

Epsom and Ewell Local Plan

Habitats Regulations Assessment of the Main Modifications

September 2026



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Epsom and Ewell Local Plan Proposed Main Modifications

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Front Cover: Mole Gap to Reigate Escarpment SAC, Box Hill

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Acronyms and abbreviations

AA	Appropriate Assessment
BNG	Biodiversity Net Gain
EiP	Examination in Public
HRA	Habitats Regulations Assessment
LAA	Land Availability Assessment
LSEs	Likely Significant Effects
MM	Main Modification
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SAC	Special Area of Conservation
SPA	Special Protection Area

1 Introduction

1.1 Context

- 1.1.1 Epsom and Ewell Borough Council (the Council) submitted its Local Plan¹ to the Secretary of State for public examination on 10 March 2025. Lepus Consulting prepared a Final Habitats Regulations Assessment (HRA) in support of the Submission Local Plan in February 2025².
- 1.1.2 During the Local Plan Examination in Public (EiP) hearings in October 2025, the Inspector raised concerns regarding the proposed quantum of development to be delivered by the Local Plan, and the robustness of some components within the supporting evidence base.
- 1.1.3 In response, the Council committed to undertake two discrete pieces of additional evidence work: (1) a review of sites discounted within the Land Availability Assessment (LAA), including the reassessment of sites previously excluded at Stage 2 on the basis of availability; and, (2) a review and update of the Green Belt evidence base, in particular the site-specific exceptional circumstances assessment (Topic Paper TP02), to address identified inconsistencies, errors, and issues in the application of the methodology. These updates were subsequently prepared and submitted to the Inspector in January 2026.
- 1.1.4 Following submission of this additional evidence, further correspondence³ between the Council and the Planning Inspectorate resulted in a request for additional work to consider the suitability of specific urban and Green Belt sites for potential allocation within the Local Plan.
- 1.1.5 As a result, the Council was required to produce, among other documents, an addendum to the Regulation 19 Final HRA Report (February 2025)⁴. This Regulation 19 HRA Addendum Report (April 2026)⁵ considered the implications of approximately 1,000 additional dwellings across urban and Green Belt sites in the context of the Local Plan as a whole, and assessed whether the resulting changes to the Plan altered the conclusions of the Regulation 19 HRA.

¹ Epsom and Ewell Borough Council (December, 2024) Proposed Submission Epsom & Ewell Local Plan 2022 – 2040 – Regulation 19.

² Lepus Consulting (February 2025). Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Final Habitats Regulations Assessment. Available at https://www.epsom-ewell.gov.uk/sites/default/files/documents/residents/planning/planning-policy/other-planning-documents/examination/SD04a%20Final%20HRA%20Report%20Reg%2019%20Feb%2025_Copy.pdf [Date accessed: 03/09/26].

³ Planning Inspectorate (2026) Examination of the Epsom & Ewell Local Plan. Available at: <https://www.epsom-ewell.gov.uk/sites/default/files/documents/residents/planning/planning-policy/other-planning-documents/examination/ID-020%20EE%20post%20hearing%20letter%203.pdf> [Date accessed: 03/09/26]

⁴ Lepus Consulting (2025). Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Final Habitats Regulations Assessment. Available at https://www.epsom-ewell.gov.uk/sites/default/files/documents/residents/planning/planning-policy/other-planning-documents/examination/SD04a%20Final%20HRA%20Report%20Reg%2019%20Feb%2025_Copy.pdf [Date accessed: 03/09/26]

⁵ Lepus Consulting (2026) Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Addendum Report. Available at: https://epsom-ewell.inconsult.uk/gf2.ti/-/1873858/285266597.1/PDF/-/COUD_031%20HRA%20Addendum%20-%20April%202026.pdf [Date accessed: 03/09/26]

- 1.1.6 The proposed changes to the Local Plan assessed in the Addendum Report were subsequently submitted to the Planning Inspectorate alongside the relevant supporting evidence. Following consideration of this material by the Inspector, the Local Plan has been further refined and a number of proposed Main Modifications have been identified. An HRA is therefore required to assess the Local Plan incorporating these Main Modifications.

1.2 Purpose of this report

- 1.2.1 This Main Modifications HRA Report supplements the earlier HRA outputs delivered alongside preparation of the Epsom and Ewell Local Plan as listed below:
- Regulation 18 Draft Local Plan HRA: Preferred Options (January 2023)⁶;
 - Regulation 19 Publication Plan Interim HRA (November 2024)⁷;
 - Regulation 19 Final HRA (February 2025)⁸; and,
 - Regulation 19 HRA Addendum Report (April 2026)⁹.
- 1.2.2 This HRA report forms part of the series of HRA reports that have been prepared to document the iterative HRA process. It focuses on whether the proposed modifications made to the submitted Local Plan since the EiP hearings will result in new LSEs upon any European site, and whether the conclusions of the HRA reports listed at **paragraph 1.2.1** remain valid in light of these proposed modifications. European sites include Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites¹⁰. This report does not contain all information normally presented in an HRA report and should therefore be read in conjunction with the HRA reports listed at **paragraph 1.2.1**.
- 1.2.3 This HRA has been prepared in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended)¹¹, known as the Habitats Regulations and has been informed by the National Planning Policy Framework (NPPF)¹². and Planning Practice Guidance (PPG)¹³.
- 1.2.4 All proposed modifications have been assessed through the HRA process to identify LSEs, with the findings presented in **Appendix A**. This assessment considers whether any impact pathways exist that could result in an LSE on any European site.

⁶ Lepus Consulting (2023) Habitats Regulations Assessment of the Epsom and Ewell Draft Local Plan, Public Consultation: Regulation 18. Available at <https://www.epsom-ewell.gov.uk/submissiondocuments> [Date accessed: 03/09/26]

⁷ Lepus Consulting (2024) Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Publication Plan 2019: Interim Habitats Regulations Assessment. Available at <https://www.epsom-ewell.gov.uk/submissiondocuments> [Date accessed: 03/09/26]

⁸ Lepus Consulting (2025). Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Final Habitats Regulations Assessment. Available at https://www.epsom-ewell.gov.uk/sites/default/files/documents/residents/planning/planning-policy/other-planning-documents/examination/SD04a%20Final%20HRA%20Report%20Reg%2019%20Feb%2025_Copy.pdf [Date accessed: 03/09/26]

⁹ Lepus Consulting (2026) Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Addendum Report. Available at: https://epsom-ewell.inconsult.uk/qf2.ti/-/1873858/285266597.1/PDF/-/COUD_031%20HRA%20Addendum%20-%20April%202026.pdf [Date accessed: 03/09/26]

¹⁰ Wetlands of international importance (both listed and proposed).

¹¹ The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date accessed: 03/09/26]

¹² Ministry of Housing, Communities and Local Government (2024) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 03/09/26]

¹³ Ibid.

2 Previous Epsom and Ewell Local Plan HRA findings

2.1 Summary of previous HRA outputs

2.1.1 Habitats Regulations Assessment has been undertaken iteratively throughout the preparation of the Epsom and Ewell Local Plan. This has included assessment at both the Regulation 18 and Regulation 19 stages, and has involved the production of the four output reports listed in **paragraph 1.2.1**. The findings and conclusions from each of these reports is summarised briefly below.

Regulation 18 Draft Local Plan HRA: Preferred Options (January 2023)¹⁴

2.1.2 An initial scoping assessment of the following European sites located within a 15km search distance from the Plan area was completed:

- Mole Gap to Reigate Escarpment SAC;
- Richmond Park SAC;
- South West London Waterbodies SPA;
- South West London Waterbodies Ramsar;
- Thames Basin Heaths SPA; and,
- Wimbledon Common SAC.

2.1.3 This was followed by an initial screening assessment of Local Plan policies, which was used to inform the progression of the Local Plan to Regulation 19.

Regulation 19 Publication Plan Interim HRA (November 2024)¹⁵

2.1.4 An updated screening assessment for LSEs upon European sites was completed. The following four European sites were screened in for further consideration in the HRA process, based upon the outlined impact pathways:

- Mole Gap to Reigate Escarpment SAC – air quality and recreational pressure;
- South West London Waterbodies SPA – water quantity;
- South West London Waterbodies Ramsar – water quantity; and,
- Wimbledon Common SAC – water quantity.

2.1.5 Given the identification of the above LSEs, an Appropriate Assessment (AA) of policies and site allocations within the Publication Local Plan was required. The Publication Plan Regulation 19 Interim AA focused on hydrological, air quality and recreational impacts at a number of European sites. The Interim HRA concluded no adverse impacts from recreational pressure or hydrological impact pathways; however, the HRA was not able to reach a conclusion regarding potential adverse air quality impacts upon the site integrity of Mole Gap to Reigate Escarpment SAC due to timescales associated with the collation of air quality modelling data.

¹⁴ Lepus Consulting (2023) Habitats Regulations Assessment of the Epsom and Ewell Draft Local Plan, Public Consultation: Regulation 18. Available at <https://www.epsom-ewell.gov.uk/submissiondocuments> [Date accessed: 03/09/26]

¹⁵ Lepus Consulting (2024) Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Publication Plan 2019: Interim Habitats Regulations Assessment. Available at <https://www.epsom-ewell.gov.uk/submissiondocuments> [Date accessed: 03/09/26]

Regulation 19 Final HRA (February 2025)¹⁶

- 2.1.6 The Final HRA included an AA which took mitigation into consideration. To inform the air quality AA, a review of air quality modelling was undertaken. It was concluded that no adverse impacts on the site integrity of any European site are anticipated due to a change in air quality, water quality or quantity, or an increase in recreational pressure, as a result of the Local Plan either alone or in-combination.

Regulation 19 HRA Addendum Report (April 2026)¹⁷

- 2.1.7 The HRA Addendum Report was conducted to account for the consideration of potential additional allocations (urban and Green Belt sites) put forward by the Council following comments received from the Planning Inspectorate at the EiP. This report was intended to be read in conjunction with the previous three HRA outputs. It focused upon whether the added site allocations would result in LSEs upon any European site, and thus whether the conclusions of the February 2025 Final HRA remain valid.
- 2.1.8 The Addendum Report concluded that the potential additional sites have the potential to result in LSEs upon the following European sites:
- Mole Gap to Reigate Escarpment SAC – air quality and recreational pressure;
 - South West London Waterbodies SPA – water quantity;
 - South West London Waterbodies Ramsar – water quantity; and,
 - Wimbledon Common SAC – water quantity.
- 2.1.9 The HRA Addendum Report therefore progressed to the next stage of the HRA process: AA. The following matters were explored in more detail:
- Impacts on designated features affected by a possible deterioration in air quality;
 - Impacts on water quantity associated with increased levels of built development; and,
 - Impacts associated with increased recreational pressure.
- 2.1.10 This AA which considered the implications of adding the further proposed sites to the final Local Plan site allocations concluded no adverse impacts on site integrity at any European site due to a change in air quality, water quantity or an increase in recreational pressure as a result of the Local Plan, either alone or in-combination. Therefore, the conclusions of the February 2025 Final HRA were deemed to remain valid.
- 2.1.11 This report will determine whether the conclusions of the Addendum Report remain valid, by assessing whether the proposed Main Modifications made to the Local Plan compromise the integrity of any European site through their impact alone, or in combination with other plans or projects.

¹⁶ Lepus Consulting (2025). Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Final Habitats Regulations Assessment. Available at https://www.epsom-ewell.gov.uk/sites/default/files/documents/residents/planning/planning-policy/other-planning-documents/examination/SD04a%20Final%20HRA%20Report%20Reg%2019%20Feb%2025_Copy.pdf [Date accessed: 03/09/26]

¹⁷ Lepus Consulting (2026) Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Addendum Report. Available at: https://epsom-ewell.inconsult.uk/gf2.ti/-/1873858/285266597.1/PDF/-/COUD_031%20HRA%20Addendum%20-%20April%202026.pdf [Date accessed: 03/09/26]

3 HRA evaluation of Main Modifications

3.1 Methodology

- 3.1.1 The proposed Main Modifications have been reviewed using the HRA methodology set out in Chapter 2 of the Regulation 19 Final HRA (February 2025)¹⁸. The assessment considered whether any of the proposed Main Modifications introduced new likely significant effects (LSEs) upon European sites or altered the conclusions of the previous HRA work.

3.2 Results

- 3.2.1 The results of the assessment of the proposed Main Modifications incorporated in the Local Plan are presented in **Appendix A**. The right-hand column identifies whether there are any LSEs which may trigger a change to the conclusions of the most recent HRA work: the Regulation 19 HRA Addendum Report (April 2026¹⁹).
- 3.2.2 The majority of the proposed Main Modifications comprise clarifications to policy wording, updates to supporting text, corrections and consequential amendments. These alterations are not anticipated to give rise to significant change to the impact pathways assessed through the HRA process (air quality, water quality and quantity, recreational pressure and urbanisation effects). Therefore, no new LSEs upon European sites are identified as a result of these alterations.
- 3.2.3 The proposed Main Modifications also comprise changes to the site allocations that have been proposed since the publication of the Regulation 19 Final HRA. All of the updated proposed sites are encompassed by the quanta previously assessed in the Regulation 19 HRA Addendum Report. As such, the conclusions drawn in the Addendum Report still stand and there is no identification of new LSEs upon European sites.
- 3.2.4 The conclusions drawn in the Regulation 19 HRA Addendum Report remain applicable. None of the proposed Main Modifications assessed in this report introduce new impact pathways or alter the mitigation measures relied upon by the HRA.

3.3 Conclusion

- 3.3.1 The review of the proposed Main Modifications has concluded that they do not alter the conclusions of the Regulation 19 HRA Addendum Report (April 2026). The conclusions of the AA therefore remain unchanged, namely that the Local Plan, as modified, will not adversely affect the integrity of any European site, either alone or in combination with other plans and projects.

¹⁸ Lepus Consulting (2025). Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Final Habitats Regulations Assessment. Available at https://www.epsom-ewell.gov.uk/sites/default/files/documents/residents/planning/planning-policy/other-planning-documents/examination/SD04a%20Final%20HRA%20Report%20Reg%2019%20Feb%2025_Copy.pdf [Date accessed: 03/09/26].

¹⁹ Lepus Consulting (2026) Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Addendum Report. Available at: https://epsom-ewell.inconsult.uk/gf2.ti/-/1873858/285266597.1/PDF/-/COUD_031%20HRA%20Addendum%20-%20April%202026.pdf [Date accessed: 03/09/26]

Appendix A: Schedule of Main Modifications and Main Modifications Assessment

Schedule of Proposed Main Modifications to the Submitted Epsom and Ewell Local Plan

The modifications below are expressed either in the conventional form of ~~strike through~~ for deletions and underlining for additions of text.

The page numbers and paragraph numbering below refer to the submission Local Plan, and do not take account of the deletion or addition of text.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM1	10-12	Introduction	To deliver the vision and objectives, there are a suite of policies and land designations. These are divided into high level policies called 'strategic policies' <u>(identifiable by the policy starting with the prefix S)</u>, and 'site allocations' <u>(identifiable by the policy starting with the prefix SA)</u>, which set the strategy for the Local Plan and provide the high-level principles that development must adhere to. For emerging Neighbourhood Plans it is important to note that policies in a Neighbourhood Plan must be in line with the strategic policies within the adopted Local Plan. Specific land designations are detailed on the Policies Map which accompanies the Local Plan. There are also detailed (non-strategic) policies called 'Development Management' policies, <u>(identifiable by the policy starting with the prefix DM)</u>, which provide the detailed criteria and standards which proposed development will be assessed against. Non-strategic policies in this Local Plan may be superseded by any policies identified in future Neighbourhood Plans. The number of people employed in the borough is forecast to increase by over 6,069 jobs over the Local Plan period <u>which will generate a need for at least 41,464 sqm of additional employment floorspace</u> (HEDNA, 2023).	To be clear which policies within the Local Plan are strategic, non-strategic and site allocations, to ensure the plan is effective and positively prepared Necessary to identify the employment needs in the borough over the plan period to ensure the plan is effective and positively prepared	No. The additional information (reference to floorspace) does not deviate from that which was assessed in the HRA Addendum; therefore, no new LSEs are identified which may compromise European site integrity.
MM2	15-16	Vision	To provide clarity on the type of place the borough is anticipated to be, and what it will seek to achieve from development, the Local Plan sets should set out a vision. The vision is should be ambitious but achievable. In addition, to support this vision, strategic objectives will prioritise outcomes and provide a reference point that both ground and justify policies in the Local Plan.	Necessary to amend wording to ensure clarity effectiveness.	No. The change to wording does not introduce any new LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Vision The vision for the borough up to 2040 is: Epsom and Ewell will continue to <u>By 2040, the borough will</u> 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. <u>Its identity will have been strengthened, with new developments and supporting public realm enhancements demonstrating high quality sustainable design that contributes positively to the local character and heritage of the built and natural environment.</u> <u>Epsom Town Centre, as the principal urban centre with excellent public transport, will remain a thriving centre, providing new homes, employment opportunities, retail, leisure, culture and community facilities including modern facilities for the University for the Creative Arts and the Laine Theatre Arts School.</u> <u>Ewell Village and Stoneleigh Broadway centres will provide hubs for the communities they serve through convenience shopping and other commercial services and public services.</u> <u>The Epsom Downs racecourse will continue to be a significant part of the borough's unique identity alongside a successful racehorse training industry. The wider economy will be thriving, benefiting from high-speed digital infrastructure, and</u>	Vision has been reordered and reworded to be more concise, necessary for effectiveness	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>performing to its full economic potential, attracting new, and supporting existing businesses, from start-ups to larger companies.</u> <u>New homes will have been delivered, including the creation of vibrant new communities with their own identities, providing homes for people of all ages with supporting infrastructure including improved public transport and pedestrian and cycling routes, social infrastructure and access to blue and green infrastructure.</u> New development will have delivered a range of new homes of varying sizes, meeting the needs of our changing population including those in specialist housing need, and from students through to older people. New development will have been focused on urban sites, with the role of Epsom Town Centre of paramount importance having seen the most exciting and significant opportunities for growth. New vibrant communities with their own identities will be centred around previously underdeveloped transport hubs and principal movement corridors. The economy will be thriving, benefiting from high-speed digital infrastructure, and performing to its full economic potential, attracting new, and supporting existing businesses, from start-ups to larger companies. The Epsom Downs racecourse will continue to be a significant part of the borough's unique identity and support a thriving equestrian sector.		

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Epsom Town Centre will have remained the principal urban centre in the borough and new development will have reflected and enhanced its urban qualities, with a rich collection of uses, compact neighbourhoods and safe streets. There will be more people living in the centre helping to support it as a prosperous market town, whilst supporting the existing shops, leisure cultural uses, public transport services and community facilities that are so valued by existing residents. New development here will have secured investment in wider public realm improvements, providing more trees to help to cool streets in the summer and provide a more attractive place and new habitat for birds and other wildlife. It will be a place where people naturally choose to walk and cycle to and around, because the surrounding environment is even more pleasant. The town centre will attract the best students and academic staff with modern facilities housing the University of Creative Arts and the Laine Theatre Arts School, who in turn contribute to the local economy. Graduates will have access to affordable space within the town centre to make and sell their creations, making Epsom Town Centre even more distinctive from other nearby centres. Ewell Village and Stoneleigh Broadway centres will continue to provide a distinct place identity and a hub for the community through convenience shopping and other commercial services such as professional services, restaurants, and public services like libraries. Infill and redevelopment opportunities will have been taken, increasing the number of residents served by these centres, helping to make them more viable in the longer term.		

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Development across the borough will have been supported by improvements in community and transport infrastructure, with active travel networks having been a core part of growth in the borough improving air quality and benefiting the health and well-being of residents.— Epsom and Ewell will continue to be valued by those who live in, work in and visit it. It's network of green spaces that are embedded within communities will have been strengthened by development. With new public open spaces as well as enhancements to the borough's existing streets and green spaces, improvements in habitats for wildlife, and provision of better links between existing green and blue infrastructure, amenity for both new and existing residents will be secured.— Growth will be different from what it has been before. There will be a greater emphasis on design and built quality, the delivery of environmentally sustainable homes, communities for families and new residents who want to contribute positively to Epsom and Ewell's unique character. New development will have helped to redress past mistakes by replacing poorly designed buildings and spaces with higher quality sustainable development.— The borough's identity will have been strengthened, with the existing character of places in the borough having played an important role in shaping development proposals in terms of building materials, proposed built form, retention of important views and vistas and improvements to the public realm.—		

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM3	18-23	Policy S1	3.5. The urban areas of the borough have been thoroughly assessed through the Land Availability Assessment (LAA) 2024, to identify the amount of development that could be sustainably and achievably accommodated. It was found that the urban sites can only provide approximately 1,6283,336 dwellings <u>which when combined with completions, commitments and windfalls accounts for</u> (approximately 35<u>3</u>% of the identified need for housing within the borough based on the standard methodology). This is based on the assumption that the urban sites identified as being suitable for development can be delivered over the plan period. 3.9. Through the allocation of five <u>nine</u> sites to be inset <u>removed</u> from the Green Belt, the council will be able to deliver an additional 1,5802,497 dwellings over the plan period, which combined with the urban area supply equates to approximately 48<u>59</u>% of the need established by the standard methodology. This is the council's preferred spatial strategy which balances social, economic and environmental objectives. 3.13. The council has carried out a robust and objective assessment of its employment needs which is detailed in the HEDNA. This assessment takes account of economic and job growth forecasts over the Local Plan period, but also local intelligence on demand for employment floorspace to meet the needs of established businesses. The HEDNA shows that there is demand for <u>at least 41,464 sqm</u> of additional employment floorspace in the area to meet the needs of existing businesses and to cater for new businesses. <i>New paragraphs in-between para. 3.13 and 3.14:</i>	Necessary to ensure plan reflects the correct numbers to ensure plan is justified and effective and consistency with national policy Necessary to clarify employment needs to ensure the plan is effective and positively prepared.	No. Potential implications of the allocation of additional urban and Green Belt sites to facilitate the provision of over 6,012 new homes and 41,464sqm was assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the propositions of Policy S1 are in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>The HEDNA employment modelling based on the baseline jobs growth scenarios forecasts over the Local Plan period a need for approximately:</u> <u>13,000 sqm of office and R&D (E(g)(i)(ii)) floorspace</u> <u>13,000 sqm of light and general industrial floorspace (E(g)(iii) and B2),</u> <u>15,500 sqm of warehousing floorspace (B8)</u> <u>In relation to supply, making use of vacant office floorspace in borough, specifically, Epsom Town Centre is likely to satisfy forecast employment needs for office accommodation over the plan period.</u> <u>In terms of needs for light industrial, industrial and warehousing floorspace this will be met through the completion of planning permissions that have commenced (approx. 5,000sqm), some additional employment land at Site Allocation SA35, an expansion of Longmead Industrial Estate and the intensification of the Longmead and Kiln Lane Industrial Estates to meet the residual need for 23,000sqm of industrial and warehousing space over the plan period.</u> 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. <u>These conclusions were revisited in 2025 and concluded to be robust.</u> 3.20. Development will first be directed to the most sustainable locations, making the best use of previously developed land in the urban area. In sequential order	New paragraphs to clarify employment needs necessary to ensure the plan is effective and consistent with national policy Modification to clarify the most recent review of the retail needs evidence is up to date and robust. Necessary for clarity and effectiveness Amendment necessary to address drafting error, hierarchy is listed	

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			these locations and further detail on their role in the spatial strategy is shown in Figure 3.1 <u>the hierarchy of development detailed below:</u> 3.22. The hierarchy of development is detailed overleaf: 3.31. Whilst these sustainable locations are our preferred locations for new development, they do not deliver adequate housing to meet our social responsibilities to provide additional housing. For this reason, the Local Plan contains five site allocations that will make a substantial contribution towards meeting housing and Gypsy and Traveller accommodation needs over the Plan period on land that is inset removed from the Green Belt. 3.32. The spatial strategy incorporates appropriate previously developed land within the existing built-up area <u>to be removed from the Green Belt</u> currently designated as Green Belt (site allocations SA31 and SA32) and greenfield land in the most sustainable locations adjacent to the existing built-up areas that are proposed to be removed from the Green Belt (site allocations SA33 to SA35 <u>and SA48 to SA51</u>). 3.33. When considering all sources of supply, the Local Plan housing requirement has been set as a minimum of 4,700 <u>6,012</u> 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 402 <u>44</u> dwellings, which provides a degree of flexibility over the Local Plan period should	- no figure 3.1. Removal of duplicated wording. Necessary for effectiveness. Deleted text, necessary for effectiveness, to avoid unnecessary duplication Modified to more appropriate wording, necessary for effectiveness and consistency with national policy Modified to appropriate wording addressed in later policy. Necessary for effectiveness and to remove unnecessary duplication. Modified to reflect increased housing supply and trajectory, necessary for plan to be positively prepared	

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			sites fail to be delivered. Further details of the sites that are key to delivering the strategy are contained in the site allocations policies of the Local Plan and shown on the Policies Map. How and when the different sources of supply are anticipated to deliver housing is contained in the Housing Trajectory (Appendix 2). Table S1a: Sources of supply over the Local Plan period: 2022-2040 (net number of new homes) <table><tr><th>Source of supply</th><th>Net no. of units</th></tr><tr><td>Housing Requirement</td><td><u>6,012</u> 4,700</td></tr><tr><td>Housing completion to date (April 2022 to March 2024<u>26</u>)</td><td><u>605</u> 456</td></tr><tr><td>Commitments (permissions as of April 2024<u>26</u>) with 10% lapse rate applied</td><td><u>604</u> 600</td></tr><tr><td>Windfall (1-4 units)</td><td><u>385</u> 455</td></tr><tr><td>Windfall (5-19 units)</td><td><u>333</u> 407</td></tr><tr><td>Large urban sites (20+ units)</td><td><u>1,477</u> 1,313</td></tr><tr><td>Small urban sites (5 to 19 units)</td><td><u>151</u> 403</td></tr><tr><td>Allocations beyond current urban area to be inset <u>removed</u> from the Green Belt</td><td>2,497 <u>1,580</u></td></tr><tr><td>Total supply over the plan period</td><td><u>4,914</u> <u>6,052</u></td></tr></table>	Source of supply	Net no. of units	Housing Requirement	<u>6,012</u> 4,700	Housing completion to date (April 2022 to March 2024 <u>26</u>)	<u>605</u> 456	Commitments (permissions as of April 2024 <u>26</u>) with 10% lapse rate applied	<u>604</u> 600	Windfall (1-4 units)	<u>385</u> 455	Windfall (5-19 units)	<u>333</u> 407	Large urban sites (20+ units)	<u>1,477</u> 1,313	Small urban sites (5 to 19 units)	<u>151</u> 403	Allocations beyond current urban area to be inset <u>removed</u> from the Green Belt	2,497 <u>1,580</u>	Total supply over the plan period	<u>4,914</u> <u>6,052</u>	and consistent with national policy It is necessary for the policy to modify housing requirements in order to be positively prepared and consistent with national policy	
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			Policy S1 – Spatial Strategy During the plan period (2022-2040): provision has been made for at least 4,700 <u>6,012</u> new homes The <u>The minimum requirement is split into an annual average requirement on a stepped basis as follows:</u> <u>Years 1 – 4 (2022/23 – 2025/26) – 152 homes per annum</u> <u>Years 5 – 18 (2026/27 – 2039/40) – 386 homes per annum</u> Table S1a shows the contribution of all sources of housing supply to deliver this housing requirement. Employment needs <u>At least 41,464 sqm of employment floorspace</u> (office, light industrial, industrial and warehousing) will be met <u>delivered</u> through the development and intensification of the strategic employment sites (as defined on the policies map), and the delivery of additional employment floorspace that is compatible with residential use in Epsom Town Centre.	Modified to reflect increased housing supply and trajectory Modified policy to specify employment and retail needs. Additional text to create Part 2 of the policy. Text relocated and reworded from Policy S2 and the supporting text It is necessary for the policy to set housing and employment land requirements in order to ensure the policy is effective, positively prepared and consistent with national policy and to ensure the policy is effective.	

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			Retail needs Any need arising for additional retail will be met through the consolidation and enhancement of existing facilities within existing Epsom Town Centre, local centres and neighbourhood parades. Provision has been made for 10 permanent pitches for Gypsies and Travellers within Epsom and Ewell over the plan period. The council will seek to make provision for additional pitches for Gypsies and Travellers by permitting suitable sites. <u>The Council will expect the development proposals and use of land to contribute positively to the social, economic and environmental enhancement of the Borough.</u>		

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MM4	24	Key diagram	Insert copy of existing and proposed key diagram to show reference to removal of inseting of Green Belt Boundary, the correct Green Belt boundaries and new site allocations.	To ensure the key diagram is positively prepared and consistent with national policy	No. Potential implications of the allocation of additional sites within the Green Belt were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Pictural representation of development within the Green Belt does not deviate from the Addendum Report assessment; thus, no further LSEs that may compromise European site integrity are foreseen.

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MM5	25	Policy S2	Policy S2 – Sustainable and Viable Development 3.35. Local Plans should be based upon and reflect the presumption in favour of sustainable development detailed in the National Planning Policy Framework. This principle informs both the policies and site allocations contained within the Local Plan and will be used to guide decision making. <u>3.35. Policy requirements of this plan have been tested and concluded to be viable. This has been confirmed by the viability assessment of the Local Plan. There should be no need for a further viability assessment at the decision-making stage. Unless the applicant advises that a late stage review is necessary. Site promoters will be expected to take account of costs arising from the policy requirements set out in the plan when negotiating to purchase land for development. The price paid for land is not a justification for failing to comply with the relevant policies in the Plan.</u> <u>3.36. Where particular circumstances justify the need for a viability assessment at the application stage, it will be up to the applicant to demonstrate how those circumstances differ from the viability assessment carried out to inform the Plan, having regard to the specific grounds set out in national planning guidance. The viability assessment will usually take the form of a published open book financial appraisal of the proposed development, demonstrating the full range of costs to be incurred by the development including the initial purchase of the land, the financial return expected to be realised, and the profit expected to be released.</u> 3.36.3.37. To facilitate an efficient decision-making process, any financial viability report/appraisal must be in compliance with the Homes England Development	Modified supporting text of Policy S2 to reflect the focus on viability as the sustainable development element of the policy has been moved to Policy S1 Necessary for effectiveness and in order to reflect changes to other policies in the Plan Additional text necessary for effectiveness and to reflect changes to other policies in the Plan removing unnecessary duplication	No. Changing the wording of Policy S2 to shift the focus away from sustainability, which has been absorbed into Policy S1, does not introduce any new LSEs that may compromise European site integrity.

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			Appraisal Tool (DAT) or any future equivalent standard. If this is not provided it will delay the application or lead to the refusal of planning permission. 3.37. Where proposals have been tested and concluded to be viable through the Local Plan viability assessment, the applicant will need to use the Local Plan viability assessment as the benchmark and state what has changed to make the proposal unviable. 3.38. By assessing the information supplied in a financial appraisal, the council will always seek to ensure that its decision represents the appropriate balance between the desirability of securing delivery of the development, and that of providing in full for the standards set out in planning policy. However, a financial appraisal submitted in support of a development is only current at the time it is prepared. Financial viability will vary over time with the changing economic and property markets. Therefore, the council will require late stage viability review mechanisms through s106 agreements where policy requirements are not met in full at the time permission is granted. <u>Viability late stage reviews</u> <u>3.39. The Council recognises that financial viability will vary over time with the changing economic and property markets and that viability assessments submitted in support of developments are only current at the time that they are prepared. Therefore, the council will require late-stage viability review mechanisms through a legal agreement where policy requirements are not met in full at the time permission is granted.</u>	Modified text necessary for effectiveness and to ensure policy is positively prepared ... Necessary for the effectiveness for the policy to specify circumstances where the Council may require late stage viability review	

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			3.39 3.40. The council's position for late-stage viability reviews is that all major developments, including residential development, include at least, an outturn retest 75% of the way through the development to compare actual costs and values with those assessed at the application stage. 3.40 3.41. On larger sites that are expected to be built out over a number of years, or in phases, the council will require viability to be re-assessed at multiple stages (such as prior to the commencement of different phases). 3.44 3.42. For schemes where the outturn test <u>late stage review</u> demonstrates that viability has improved and the <u>approved</u> scheme did not satisfy the <u>affordable housing policy</u> requirements set out in the Local Plan, the council will <u>expect additional affordable housing to be provided on-site or in exceptional circumstances, an in lieu contribution to off-site affordable housing, will be required work with the developer to deliver increased affordable housing provision having regard to the outcomes of the late stage review. Additional affordable housing should be provided on site (where feasible) or through an in lieu contribution to offsite affordable housing.</u> Policy S2 – Sustainable and Viable Development Sustainable Development When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The council will always work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.	Necessary for effectiveness for 'sustainable development' parts of the policy moved to policy S1 and to remove unnecessary duplication	

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			Planning applications that accord with the policies in the Local Plan (and, where relevant, with policies in Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or they are out of date at the time of making the decision then the council will grant permission unless material considerations indicate otherwise — taking into account whether: a) any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework or taken as a whole; or b) specific policies in the National Planning Policy Framework indicate that development should be restricted. Viable Development 41) Viability will only be considered a constraint in exceptional circumstances and where there are significant additional costs not anticipated through the Local Plan process. The starting point is that the policy requirements detailed in this plan are viable and that development proposals should meet all policy requirements in full. 52) In order to demonstrate viability constraints to justify not meeting the local plan policy requirements in full, proposals must be supported by viability study. This will normally take the form of a published open book financial appraisal of the proposed development, demonstrating the full range of costs to be incurred by the development including the initial purchase of the land, the financial return expected to be realised, and the profit expected to be released. Where applicants consider particular circumstances justify the need for a viability assessment at the application stage, they will need to demonstrate how those circumstances differ from the viability assessment carried out to inform the Local Plan, such as that there are		

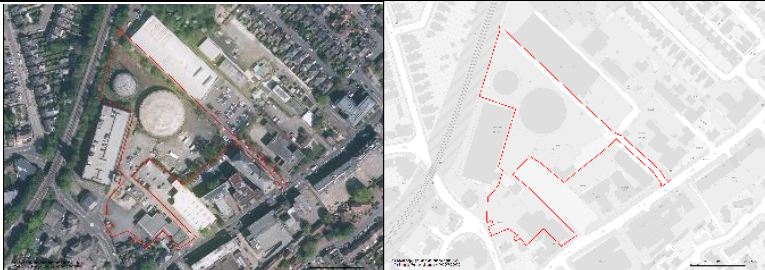
Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>unforeseen significant additional costs. The council will commission an independent review of submitted viability assessments which will be funded by the applicant.</u> 6) Where an applicant submits a viability assessment, the council will commission an independent review of the costs of which will be funded by the applicant. 73) 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.		

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MM6	27	Policy S3	Policy S3 – Climate Change <u>Adaption</u> and Mitigation	To ensure the name of the policy more accurately reflects what the policy covers, necessary for effectiveness	No. The change to the title wording of Policy S3 does not introduce any new LSEs that may compromise European site integrity.

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MM7	30	Policy S4	Policy S4: Epsom Town Centre <u>Epsom Town Centre is defined on the policies map. Development will be permitted here which:</u> The Council will work with partners and private developers to: <u>Promotes</u> Encourage the regeneration of the town centre to deliver high quality <u>and high density</u> development <u>that makes efficient use of land</u> through the redevelopment of the site allocations detailed in this plan and other windfall sites that may come forward in the future; Encouraging <u>Secures</u> 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; <u>Maintains</u> and <u>enhances</u> the visitor experience and night-time economy; <u>Retains</u> and <u>enhances</u> existing markets and support opportunities for the creation of new markets; <u>Delivers</u> high quality public realm integrating tree planting, landscaping and good quality design to assist in delivering the aspirations of the Epsom Town Centre Masterplan; <u>Supports</u> the delivery of the Surrey Local Transport Plan 4 and any successors, and proposals in the Epsom and Ewell Local Cycling and	Modifications to include adding reference to the efficient use of land, securing mixed uses and criteria g. Necessary for the effectiveness of the policy	No. Land usage covered by the policy (including effective and mixed usage) was encompassed in the HRA Addendum assessment. No additional LSEs that may compromise European site integrity have been introduced through the modification.

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			Walking Infrastructure Plan to support the transition towards zero carbon transport; Ensures the distinctive character of Conservation Areas within the town centre boundary are conserved and, where possible, or enhanced. 3.52 Epsom Town Centre is the main centre for the borough and provides for a mix of shopping, leisure, civic, cultural and community facilities. The boundary of the town centre is shown on the policies map.	Necessary for effectiveness to recognise the role that residential use play within the town centre and remove the reference to policies map as this has been moved to the policy wording	
MM8	32	Para 4.3	4.3. Site Allocation policies SA1 – SA30, <u>and SA36-SA47</u> - set out the residential-led site allocations within the borough's urban area, whilst policies SA31-SA35, <u>SA48-SA51</u> allocate land for development that is to be <u>removed</u> inset from the Green Belt.	Modified to more appropriate wording on Green Belt allocations and the additional references to additional site allocations Necessary for effectiveness and ensuring the Plan is positively prepared	No. Potential implications of the allocation of additional sites within the borough's urban areas and Green Belt were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the proposed additional sites are in-keeping with the findings

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					of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM9	33	Policy SA1	Policy SA1 – Southern Gas Network Site Allocated for: Approximately <u>A minimum of 455 456 dwellings (C3)</u> and a bespoke performing arts centre for the Laine Theatre Arts. Site Area: 4.54-61.69 <u>ha</u> Planning history: Application <u>reference</u> 24/01107/FUL (<u>permitted</u>) 	Modified to reflect number of units as a minimum of 456 dwellings necessary to ensure consistent with national policy and optimising density Removed 'C3' , Modified site area and added 'permitted' with the addition of application 'reference' wording all for effectiveness Part a) modified for effectiveness and to recognise potential conflict between users in this location	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the proposed additional site is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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			 In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>that is designed to minimise potential conflict between car users, pedestrians and cyclists.</u> Provide a linear <u>public</u> open space to provide permeability through the site for pedestrians and cyclists into and from the development to provide connectivity between Hook Road and the Rainbow Leisure Centre. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16. Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied. Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the railway that adjoins the northern boundary of the site.	Part b) amended to reflect planning permission Remaining parts of the policy amended for effectiveness	

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			Conserve and, where possible, or enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings that adjoin the site, <u>through design incorporating positive elements of local character and appearance.</u> Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential. <u>Be designed Design</u> to enable the comprehensive redevelopment of the adjoining Hook Road Car Park site (Site Allocation SA2) as a future phase. <u>Include mixed use ground floor active frontages providing Commercial, Business and Service floorspace to provide natural surveillance of the public realm.</u>		
MM10	35	Policy SA2	Policy SA2 – Hook Road Car Park Allocated for: Approximately <u>A minimum of 145 150</u> dwellings. Site Area: 0.486ha Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>that is designed to minimise potential conflict between car users, pedestrians and cyclists.</u> Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.	Modified to reflect number of units as a minimum of 145 dwellings necessary to ensure consistent with national policy and optimising density Parts a, c and f amended for effectiveness Modified part i) to incorporate wording around active frontages necessary for effectiveness Part j) Include wording to reflect future car park	No. The reduction in the proposed number of units to ensure wider policy adherence and optimal development density introduces no further LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied. Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the railway that adjoins site. Conserve and, where possible, or enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings. Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential. Be designed as a future phase of the adjoining Southern Gas Networks Site (Site Allocation SA1). <u>Include mixed use ground floor active frontages providing Commercial, Business and Service floorspace to provide natural surveillance of the public realm.</u> <u>Consider the findings of the Councils car parking study and its recommendations in relation to public car parking provision at the site.</u>	study to ensure policy is positively prepared	
MM11	36	Policy SA3	Policy SA3 – Solis House, 20 Hook Road Allocated for: Approximately <u>A minimum of 20 dwellings (C3).</u> Site Area: 0.07ha Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access from Hook Road.	Modified to reflect number of units as a minimum necessary to ensure consistent with national policy and optimising density Removed 'C3' as use classes, part a, f and g all modified for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number is

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			Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining railway line. Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied. Conserve and, where possible, or enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings <u>through sensitive design incorporating positive elements of local character and appearance.</u> Undertake archaeological investigations in accordance with Policy DM13 45, taking account of the site's location within an Area of High Archaeological Potential. <u>Consider the site's prominent location for a high-quality designed landmark building.</u>	Part h) Criteria added in terms of design to reflect the site's prominent location to ensure policy is positively prepared	in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM12	37	Policy SA4	Policy SA4 – Bunzl, Hook Road Allocated for: Approximately <u>A minimum of 35 20</u> dwellings. Site Area: 0.17ha Planning history: <u>Application reference 24/00230/FUL & 23/01440/PDCOU (both permitted)</u>	Modified to reflect number of units as a minimum of 35 necessary to ensure consistent with national policy and optimising density. Addition of 'application reference' wording and	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the proposed additional sites are in-keeping with the findings

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			In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site. Conserve and, where possible, or enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings at 10 and 12 Hook Road. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16. Investigate and if identified remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied.	permitted for effectiveness Part a) modified to address site specific access for effectiveness Add 'conserve or enhance' to all references in site allocations Part d) For clarification purposes	of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM13	38	Policy SA5	Policy SA5 – Epsom Town Hall Allocated for: Approximately <u>A minimum of</u> 90 dwellings (C3). Site Area: 0.74ha Planning history: None	Modified to reflect number of units as a minimum necessary to ensure consistent with national policy and optimising density	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the

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			In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Dullshot Green. Maximise retention and safeguarding of existing trees and incorporate them into a well-integrated landscape strategy. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. Design surface and foul water drainage to include all required measures arising from the site being located in Ground Source Protection Zone 1. Undertake archaeological investigations in accordance with Policy DM1345 taking account of the site's location within an Area of High Archaeological Potential. Conserve and, where possible, or enhance the setting of the Epsom Town Centre Conservation Area and the Grade II listed 'Old Pines' that are located in close proximity to the site <u>through sensitive design incorporating positive elements of local character and appearance.</u> <u>Retain some public car parking which includes blue badge spaces.</u> <u>Maximise linkages with the town centre by integrating cross site movement routes for pedestrians and cyclists.</u>	Removed 'C3' as use classes, amended parts a, e,f, g and h to ensure policy is positively prepared	integrity of European sites were anticipated. Therefore, the proposed additional sites (alongside greater emphasis on ensuring safe access) are in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM14	39	Policy SA6	Policy SA6 – Hope Lodge Car Park Allocated for: Approximately A minimum of 35 30 dwellings (C3). Site Area: 0.4ha Planning history: None	Modified to reflect number of units as a minimum of 35 necessary to ensure consistent with national	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Dullshot Green. b) Maximise retention and safeguarding of existing trees and hedgerows, and incorporate them into a well-integrated landscape strategy <u>which frames and provides intervisibility of Dullshot Green as a public space.</u> c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. d) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. e) Undertake archaeological investigations in accordance with policy DM13 45, taking account of the site's location within an Area of High Archaeological Potential. f) Conserve and, where possible, or enhance the setting of Grade II Listed Hope Lodge that adjoins the site boundary to the East <u>through sensitive design incorporating positive elements of local character and appearance.</u> g) <u>Consider the findings of the Councils car parking study and its recommendations in relation to public car parking provision at the site.</u>	policy and optimising density Removed 'C3' as use classes, amended parts a,b,e and f for effectiveness Amend part g Include wording to reflect future car park study to ensure policy is positively prepared Changes necessary to ensure policy is justified and effective	integrity of European sites were anticipated. Therefore, the proposed additional sites (alongside greater emphasis on ensuring safe access) are in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM15	40	Policy SA7	Policy SA7 – Former Police and Ambulance Station Sites Allocated for: Erection of a new 85 bedroom residential, nursing and dementia care home for the frail elderly (Use Class C2). Site Area: 0.37ha	Modified to removed use class reference, add the addition of 'application reference' wording and deletion of	No. This change introduces no further LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Planning history: Application reference 22/00923/FUL (approved, subject to S106 agreement) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Church Street. b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. c) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. d) Conserve and, where possible, or enhance the setting of Grade II building at 45 Church Street that lies beyond the site boundary <u>through sensitive design incorporating positive elements of local character and appearance.</u> e) Minimise loss of existing trees, including appropriate root protection for those immediately adjacent to the site.	'subject to S106 agreement' all necessary to ensure the policy is positively prepared Parts a and d modified to ensure the policy is effective	
MM16	41	Policy SA8	Policy SA8 – Epsom Clinic Allocated for: Approximately <u>A minimum of</u> 30 dwellings. Site Area: 0.17ha Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Dullshot Green.	Modified to reflect number of units as a minimum of 30 necessary to ensure consistent with national policy and optimising density Part a) site specific vehicular access and	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			b) Conserve and, where possible, or enhance the setting of the Church Street Conservation Area that adjoins the site boundary to the South West and the Grade II Listed Hope Lodge that lies beyond the site boundary to the North <u>through sensitive design incorporating positive elements of local character and appearance.</u> c) Undertake archaeological investigations in accordance with Policy DM1345, taking account of the site's location within an Area of High Archaeological Potential. d) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. e) Design surface and foul water drainage to include all required measures arising from the site being in Groundwater Source Protection Zone 1. f) Minimise the loss of existing trees and hedgerows within the site.	transport needs modified for effectiveness as are parts b, and c	estimated) site number is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM17	42	Policy SA9	Policy SA9 – Depot Road and Upper High Street Car Park Allocated for: Approximately <u>A minimum of</u> 100 dwellings (C3) and a decked public car park. Site Area: 1.24ha Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Upper High Street and Church Street.	Modified to reflect the number of units as a minimum of 100 dwellings necessary to ensure consistent with national policy and optimising density. Removed 'C3' use class reference, amend part a, c, and g to ensure the policy is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number is in-keeping with the findings of the Addendum

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			b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. c) <u>Conserve or enhance</u> Have regard to the setting of the adjoining Pikes Hill Conservation Area <u>located to the east of the site through sensitive design.</u> 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 DM1345, 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. <u>g) Consider the findings of the Councils car parking study and its recommendations in relation to public car parking provision at the site.</u>		Report and no further LSEs that may compromise European site integrity are foreseen.
MM18	43	Policy SA10	Policy SA10 – 79-85 East Street Allocated for: Approximately <u>A minimum of 34 dwellings (C3).</u> Site Area: 0.22ha Planning history: <u>Application reference 22/01953/FUL and 22/01954/FUL (both permitted)</u> In addition to complying with the policies in the plan, any developer of this site will be required to: <u>a) Provide safe and appropriate vehicle, pedestrian and cycle access to the site from East Street and/or Linton's Lane.</u>	Modified so the number of units reflected as a minimum of 34 units necessary to ensure consistent with national policy and optimising density Removed 'C3' as use class and changed to criteria a and d to ensure the policy is	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number is in-keeping with the findings of the Addendum

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			ab) 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. bc) 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. ed) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. de) Conserve and, where possible, or enhance the setting of the adjoining Lintons Lane Conservation Area and Grade II Listed buildings <u>at 10 and 12 Lintons Lane through sensitive design incorporating positive elements of local character and appearance.</u>	positively prepared and effective	Report and no further LSEs that may compromise European site integrity are foreseen.
MM19	44	Policy SA11	Policy SA11 – Finachem House, 2 – 4 Ashley Road Allocated for: Approximately <u>A minimum of 38 20 dwellings (C3) or 90 units of student accommodation</u> Site Area: 0.12ha Planning history: Pre-application In addition to complying with the policies in the plan, any developer of this site will be required to:	Modified so the number of units reflected as a minimum and amended number of units to ensure policy is positively prepared. Removed 'C3' as use class, amended part a, g, e and f addressing site specific	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect an increased site number is

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from the Ashley Road. b) Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining A24. c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. d) Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. Conserve and, where possible, or enhance the setting of the Epsom Town Centre Conservation Area and the Grade II* listed 'Ashley House' that adjoin the site boundary to the North <u>through sensitive design incorporating positive elements of local character and appearance.</u> Undertake archaeological investigations in accordance with Policy DM1345, taking account of the site's location within an Area of High Archaeological Potential. <u>g) Consider the site's prominent location for a high-quality design landmark building.</u>	requirements for effectiveness	in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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MM20	45	Policy SA12	Policy SA12 – Global House Allocated for: Approximately <u>A minimum of</u> 75 dwellings (C3) Site Area: 0.29ha Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide appropriate pedestrian and cycle access to the site <u>from Ashley Avenue</u>. Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining A24. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. Conserve and, where possible, or enhance the setting of the nearby Epsom Town Centre Conservation Area and listed buildings <u>through sensitive design incorporating positive elements of local character and appearance</u>. Undertake archaeological investigations in accordance with Policy DM153, taking account of the site's location within an Area of High Archaeological Potential.	Modified to reflect the number of units as a minimum of 75 necessary to ensure consistent with national policy and optimising density. Removed 'C3' as use class, amend part a addressing site specific vehicular access and transport needs and part e for clarification purposes and to reference design, part f to reference correct policy All changes necessary changes for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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MM21	46	Policy SA13	Policy SA13 – Swail House Allocated for: Refurbishment of Swail House for residential use <u>(approximately 45 dwellings)</u> and the provision of replacement purpose-built specialist accommodation for the RNIB consisting of approximately <u>a minimum of</u> 45 dwellings (net) located to the rear of Swail House. Site Area: 1.05ha Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Heathcote Road <u>and pedestrian and cycle access from Heathcote Road and Ashley Road.</u> Ensure the site layout maximises retention and safeguarding of mature existing trees, including those covered by a Tree Preservation Orders, incorporating them in a coherent landscaping strategy for the site. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. Conserve and, where possible, or enhance the setting of the Church Street conservation area that adjoins the site <u>through sensitive design incorporating positive elements of local character and appearance.</u> Retention of the Grade II listed wall that forms part of the site boundary.	Modified to reflect latest position with planning application and to state a minimum number of units. Part a amended to address site specific vehicular access and transport needs modified for precision, part e of the policy amended to add specific design criteria and part g amendment to reference correct policy. All necessary changes made for effectiveness of the policy	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis on safe access) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Undertake archaeological investigations in accordance with Policy DM13-45, taking account of the site's location within an Area of High Archaeological Potential.		
MM22	47	Policy SA14	Policy SA14 – 60 East Street Allocated for: Approximately <u>A minimum of</u> 30 dwellings (C3) Site Area: 0.24ha Planning history: <u>Application reference 24/00900/PDCOU (permitted prior approval)</u> In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>from East Street</u>. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.	Modified to reflect a minimum number of units, Use class reference removed, addition of 'application reference' wording and permission, part a amended to address site specific vehicular access and transport needs. All changes necessary for effectiveness of the policy	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis on safe access) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM23	48	Policy SA15	Policy SA15 – Corner of Kiln Lane and East Street (101b East Street) Allocated for: Approximately <u>A minimum of</u> 5 dwellings Site Area: 0.03ha Planning history: <u>Application reference</u> 15/01663/FUL (unimplemented) In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site 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. <u>Consider the site's prominent location for a high-quality designed landmark building.</u>	Modified to reflect the number of units as a minimum of 5 units necessary to ensure consistent with national policy and optimising density. Addition of 'application reference' wording, additional text to part a to address site specific vehicular access and transport needs and further text to reflect the prominence of the site/landmark building. Necessary for the effectiveness of the policy	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM24	49	Policy SA16	Policy SA16 – Land at Kiln Lane Allocated for: Approximately <u>A minimum of</u> 40 dwellings Site Area: 0.67ha Planning history: None	Amended to reflect the number of units as a minimum, necessary to ensure consistent with national policy and optimising density.	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the

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			In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>from Kiln Lane</u>. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1. <u>Design the scheme to ensure the amenity impacts on future occupiers from adjacent non-residential uses is adequately addressed.</u>	Parts a and e additional text to ensure regard is had to residential amenity given the proximity of industrial uses. Necessary changes made for effectiveness	integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis on safe access) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM25	50	Policy SA17	Policy SA17 – Hatch Furlong Nursery Allocated for: Approximately <u>A minimum of</u> 30 dwellings (C3) Site Area: 0.5ha Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide appropriate vehicle, pedestrian and cycle access to the site from Castle Way or the A24 Ewell Bypass which meets all relevant requirements of the	Modified to reflect number of units as a minimum of 30 necessary to ensure consistent with national policy and optimising density. Use class reference removed, Part a amended to clarify how access to the site will be achieved. Part d removed to reflect	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Highways Authority with regard to accessibility and safety. <u>Provide pedestrian and cycle access to the site from Cheam Road.</u> Maximise retention and safeguarding of existing trees and hedgerows, and incorporate them into a well-integrated landscape strategy. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. d) Design surface and foul water drainage to include all required measures arising from the site being in Groundwater Source Protection Zone 2. e) d) Undertake archaeological investigations in accordance with policy DM1345, taking account of the site's location within an Area of High Archaeological Potential. f) e) Provide suitable noise attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from traffic on the A24 Ewell Bypass.	correct mapping data, Part e amendment to reference correct policy. Necessary changes made for effectiveness of the policy	emphasis on safe access) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM26	51	Policy SA18	Policy SA18 – Land to the Rear of Rowe Hall Allocated for: Extra Care Accommodation (Class C2) comprising 96 self contained apartments, staff and communal facilities. Site Area: 1.237ha Planning history: Outline Planning Application Granted June 2024 Reference: EP23/00633/CMA In addition to complying with the policies in the plan, any developer of this site will be required to:	Use class reference removed, part a and e modified to address site specific vehicular access and transport needs, part b modified to improve clarity on access arrangements and parking provision. Modified c and new part f. All of the above	No. This change introduces no further LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from the Salisbury Road. Provide a revised Scouts Hut curtilage to include a new <u>parking</u> amenity area <u>incorporating the shared access way</u>. 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. <u>Facilitate access to public transport including bus or other public transport services including facilities that encourage public transport use.</u> <u>Undertake and submit an appropriate desk-based assessment and written scheme of investigation due to the site's location within an Area of High Archaeological Potential.</u>	changes necessary for effectiveness of the policy	
MM27	52	Policy SA19	Policy SA19 – 7 Station Approach Allocated for: Approximately <u>A minimum of 5 8 dwellings (C3)</u> Site Area: 0.04ha Planning history: <u>Application reference 21/01156/FUL Redevelopment to provide 43 residential units (Class C3) within a part 3, part 4 storey building (refused) 25/00404/FUL Mixed use redevelopment for commercial units and 9 residential units (permitted)</u>	Modified to reflect number of units as a minimum of 8 necessary to ensure consistent with national policy and optimising density. Use class reference, addition of 'application reference' wording and updated application to latest permission, part	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect an increased site number is in-keeping with the

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site. Design surface and foul water drainage to include all required measures arising from the site being located in a Groundwater Source Protection Zone <u>3</u>.	a) addressing site specific vehicular access and transport needs, part b added Groundwater Source Protection Zone number, all changes necessary for effectiveness	findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM28	53	Policy SA20	Policy SA20 – Esso Express, 26 Reigate Road Allocated for: Approximately <u>A minimum of</u> 10 dwellings (C3) Site Area: 0.25ha Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate; i) vehicle, pedestrian and cycle access <u>from the Ewell By-Pass</u>. ii) <u>pedestrian and cycle access from Reigate Road</u>. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. Ensure the site layout maximises retention and safeguarding of mature existing trees, incorporating these in a coherent landscaping strategy for the site.	Modified to reflect number of units as a minimum of 10 necessary to ensure consistent with national policy and optimising density. Use class reference, part a to provide clarity as to where access is to be achieved from, part d amendment to reference correct policy. Necessary changes made for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis upon safe access) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Undertake archaeological investigations in accordance with Policy DM1345, taking account of the site's location within an Area of High Archaeological Potential.		site integrity are foreseen.
MM29	54	Policy SA21	Policy SA21 – Richards Field Car Park Allocated for: Approximately <u>A minimum of 7 dwellings and the retention of a minimum of 7 public car parking spaces.</u> Site Area: 0.07ha Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Chessington Road. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.	Modified to reflect the number of units as a minimum of 7 necessary to ensure consistent with national policy and optimising density. Amendment to the allocation to specify the retention of some parking on the site. Part a addressing site specific vehicular access and transport needs modified for clarity, Necessary changes made for effectiveness of the policy	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number, alongside the retention of public car parking spaces, is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM30	55	Policy SA22	Policy SA22 – Etwelle House, Station Road Allocated for: Approximately <u>A minimum of</u> 20 dwellings (C3) Site Area: 0.2ha Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Station Approach <u>whilst ensuring the safety of users of the adjoining railway station.</u> Remediate the land of any contamination and ensure the remediation is complete before any part of the development is occupied. Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the adjoining railway station and railway line.	Modified to reflect the number of units as a minimum of 20 necessary to ensure consistent with national policy and optimising density. Use class reference removed, part a addressing site specific vehicular access and added reference to adjoining railway station. Necessary changes made for clarity and effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis upon safe associated transport usage) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM31	56	Policy SA23	Policy SA23 – 140-142 Ruxley Lane Allocated for: Approximately 12 dwellings (C3) Site Area: 0.2ha Planning history: 23/00588/FUL – Redevelopment into 14 dwellings (Granted)	Policy deleted as the site is almost complete	No. Policy deletion introduces no new LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide appropriate vehicle, pedestrian and cycle access from Ruxley Lane. b) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16. c) Ensure the site layout maximises retention and safeguarding of mature existing trees, incorporating these in a coherent landscaping strategy for the site.		
MM32	57	Policy SA24	Policy SA24 – Garages at Somerset Close & Westmorland Close Allocated for: Approximately <u>A minimum of</u> 6 dwellings (C3) Site Area: 0.10ha Planning history: Multiple applications for the redevelopment of garages to 6 flats (20/01758/FUL – 20/01760/FUL <u>Application references: 23/00188/FUL, 23/00192/FUL & 23/00193/FUL</u> (refused)) In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access <u>from Somerset Close and Westmorland Close</u>. Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.	Modified to reflect the number of units as a minimum of 6 necessary to ensure consistent with national policy and optimising density. Use class reference removed, addition of 'application reference' wording. Amendment to correct planning applications references, part a addressing site specific vehicular access and transport needs, necessary for clarity and effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis on safe associated transport usage) is in-keeping with the findings of the Addendum Report and no further LSEs that may

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					compromise European site integrity are foreseen.
MM33	58	Policy SA25	Policy SA25 – 64 South Street Epsom Allocated for: Approximately <u>A minimum of</u> 10 dwellings Site Area: 0.14ha Planning history: <u>Application reference</u> 20/00041/FUL - COU from B1 to 6 dwellings (lapsed) In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate: i) vehicle, pedestrian and cycle access <u>from Saint Margaret Drive;</u> ii) <u>pedestrian and cycle access</u> from South Street (A24). Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. Design surface and foul water drainage to include all required measures arising from the site being located in <u>Groundwater</u> Source Protection Zone 1. Undertake archaeological investigations in accordance with Policy DM1345, taking account of the site's location within an Area of High Archaeological Potential.	Capacity revised and reflected as a minimum necessary to ensure consistent with national policy and optimising density.. Addition of 'application reference' wording. Part a addressing site specific vehicular access and transport needs, part c addition of 'groundwater', part d amendment to reference correct policy. Part e Additional text all necessary for the policy to be effective	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis on safe associated transport usage) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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			Conserve and, where possible, or enhance the setting of the Woodcote Conservation Area and the adjacent Grade II listed Abel Cottages <u>through sensitive design incorporating positive elements of local character and appearance.</u>		
MM34	59	Policy SA26	Policy SA26 – 35 Alexandra Road Allocated for: Approximately <u>A minimum of</u> 8 dwellings (C3) Site Area: 0.10ha Planning history: <u>Application reference: 21/01920/FUL</u> - 9 flats (withdrawn) In addition to complying with the policies in the plan, any developer of this site will be required to: Provide appropriate <u>and safe</u> vehicle, pedestrian and cycle access to the site <u>from Alexandra Road.</u> Ensure the site layout maximises retention and safeguarding of mature existing trees, including the tree covered by a Tree Preservation Order, incorporating these in a coherent landscaping strategy for the site. Design surface and foul water drainage to include all required measures arising from the site being located in <u>Groundwater</u> Source Protection Zone 1, as well as meeting the requirements for sustainable drainage in Policy S16.	Modified to reflect the number of units as a minimum of 8 necessary to ensure consistent with national policy and optimising density. Use class reference removed, addition of 'application reference' wording, part a amendment to reference the road access is to be achieved from, part c addition of 'Groundwater' and removal of reference to policy S16, all changes necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis on safe associated transport usage) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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MM35	60	Policy SA27	Policy SA27 – 22-24 Dorking Road Allocated for: Approximately <u>A minimum of</u> 18 dwellings Site Area: 0.12ha Planning history: <u>Application reference:</u> 19/01365/FUL - Demolition and erection of 20 flats (refused) In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Dorking Road <u>and/</u> or White Horse Drive. Conserve and, where possible <u>or</u> enhance the setting of the Grade II* and Grade II listed buildings in close proximity to the site <u>through sensitive design incorporating positive elements of local character and appearance.</u>	Modified to reflect the number of units as a minimum of 18 necessary to ensure consistent with national policy and optimising density. Addition of 'application reference' wording. Part a addressing site specific vehicular access and transport needs modified for clarity, part b additional text regarding design, all necessary effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis on safe associated transport usage) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM36	61	Policy SA28	Policy SA28 – 63 Dorking Road Allocated for: <u>A minimum of</u> 6 dwellings (C3) Specialist Care Home (C2) with ancillary nurses accommodation (equivalent to 6 net C3 dwellings) Site Area: 0.14ha	Modified to reflect the number of units as a minimum of 6 necessary to ensure consistent with national policy and optimising	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Hylands Mews. <u>Retain and convert</u> Conserve and enhance the part of the building that is Grade II Listed. Conserve <u>or and</u> enhance the setting of the Grade II Listed buildings adjoining the site <u>through sensitive design incorporating positive elements of local character and appearance</u>.	density. Allocate for general residential use. Use class reference removed, part) addressing site specific vehicular access and transport needs modified, part b To specify that the existing structure is to be retained and converted and additional design related text at part c all necessary for effectiveness	integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside greater emphasis on safe associated transport usage) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM37	62	Policy SA29	Policy SA29 – 65 London Road Allocated for: Care home up to 81 bedrooms (use class C2) Site Area: 0.30ha Planning history: 23/00817/FUL (approved, but not implemented), 22/00728/FUL (approved, but not implemented) and 20/01079/FUL (approved, but not implemented) In addition to complying with the policies in the plan, any developer of this site will be required to:	Policy deleted as permission being implemented	No. Policy deletion introduces no new LSEs that may compromise European site integrity.

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			a) Provide appropriate vehicle, pedestrian and cycle access to the site from London Road. b) Design surface and foul water drainage to include all required measures arising from the site being located in Source Protection Zone 2, as well as meeting the requirements for sustainable drainage in Policy S16. c) Conserve and, where possible, enhance the setting of the Grade II listed buildings in close proximity to the site.		
MM38	63	Policy SA30	Policy SA30 – Epsom General Hospital Allocated for: A minimum of approximately 305 units older people's accommodation (Use Class C2), 24 key worker dwellings (C3) and community uses, a children's nursery (Use Class E) Site Area: 1.45ha Planning history: <u>Application reference:</u> 21/00252/FUL (granted at appeal, development commenced), 20/00108/FUL (approved) and 19/01722/FUL (refused) In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Woodcote Green Road. <u>b) Provide offsite highway improvements:</u> <u>i) along Woodcote Green Road to improve safety and public transport infrastructure</u>	Capacity expressed as a minimum, necessary to ensure consistent with national policy and optimising density. Use classes removed, part a addressing site specific vehicular access and transport needs, part c new wording to specifically reference highway improvements and bus infrastructure. All necessary for the policy to be effective	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside density optimisation, details on transport needs, and removal of use class reference) is in-keeping with the findings of the

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>ii) along Dorking Road to improve public transport infrastructure</u> bc) Satisfy the requirements for sustainable drainage in Policy S16.		Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM39	64	Policy SA31	Policy SA31 – Land at West Park Hospital (South) Allocated for: Approximately <u>A minimum of 50 dwellings (C3)</u> Site Area: 1.81ha Planning history: None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>from Richmond Crescent.</u> b) <u>Establish a legal mechanism to secure or enhance service frequency of bus services operating in the vicinity of the site to ensure connectivity to the wider area.</u> bc) 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. ed) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.	Modified to reflect the number of units as a minimum of 50 necessary to ensure consistent with national policy and optimising density. Remove use class reference, amend part a addressing site specific vehicular access and transport needs modified for clarity, amendment part c,d and g all necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside density optimisation, details on transport needs, and removal of use class reference) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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			d)e) Conserve and, where possible, or enhance the setting of the West Park Conservation Area <u>through sensitive design incorporating positive elements of local character and appearance.</u> e)f) Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees, incorporating these in a coherent landscaping strategy for the site. f)g) Undertake archaeological investigations in accordance with Policy DM1345, taking account of the site's location within an Area of High Archaeological Potential.		
MM40	65	Policy SA32	Policy SA32- Land at West Park Hospital (North) Allocated for: Approximately <u>A minimum of 1850 dwellings (C3)</u> 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 <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site <u>from the existing hospital access road.</u> and enable the site to be served by public transport <u>b) Establish a legal mechanism to secure or enhance service frequency of bus services operating in the vicinity of the site to ensure connectivity to the wider area</u>	Modified to reflect the number of units as a minimum of 180 necessary to ensure consistent with national policy and optimising density. Use class reference removed, part a addressing site specific vehicular access and transport modified, part b wording to specifically reference bus infrastructure, part e amended to reference the water tower, part g amendment to reference correct	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside density optimisation, details on infrastructure needs, and removal of use class reference) is in-keeping with the findings of the Addendum Report and no further LSEs that may

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			bc) Provide permeability through the site for pedestrians and cyclists into and from development to provide connectivity between adjoining residential areas and Horton County Park. ed) 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. de) 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. ef) Conserve and, where possible, or enhance the setting of the West Park Conservation Area <u>and Grade II listed water tower</u> that lies to the south of the site <u>through sensitive design incorporating positive elements of local character and appearance.</u> fg) Ensure that site layout that retains and safeguards existing mature trees as part of a coherent landscaping strategy for the site. gh) Undertake archaeological investigations in accordance with policy DM1345, taking account of the site's location within an Area of High Archaeological Potential	policy. All necessary for the policy to be positively prepared and effective	compromise European site integrity are foreseen.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM41	66	Policy SA33	Policy SA33- Land at Chantilly Way Allocated for: Approximately <u>A minimum of</u> 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 <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from Chantilly Way. <u>b) Provide off site improvements to Chantilly Way to improve connectivity from the site to adjacent site allocation SA35 to improve access to bus services.</u> b c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment. c) Conserve and, where possible, enhance the setting of Grade II Listed Horton Farm House that lies beyond the site boundary to the North West. d) Minimise the loss of existing trees, including appropriate root protection for those immediately adjacent to the site. <u>e)</u> Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.	Modified to reflect number of units as a minimum of 30 dwellings necessary to ensure consistent with national policy and optimising density. Use class reference removed, part a addressing site specific vehicular access and part b additional criteria added to require public transport connectivity particularly bus infrastructure, removed criteria c reference to heritage asset, not relevant for this site, all changes necessary for effectiveness of the policy	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside density optimisation, details on transport needs, and removal of use class reference) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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MM42	67	Policy SA34	Policy SA34- Hook Road Arena Allocated for: New Sports Hub for <u>community use</u> in the borough to include playing pitches (grass and artificial), a new pavilion and changing facilities. The provision of <u>a minimum of approximately 100 dwellings</u> (C3) on the eastern part of the site. Site Area: 14 ha Planning History: None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from the existing access on Hook Road. <u>b) Facilitate access to public transport including bus services operating within the vicinity of the site to ensure connectivity to the wider area.</u> b)c) Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16 and site-specific guidance in the Level 2 strategic Flood Risk Assessment. e)d) Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees, incorporating these in a coherent landscaping strategy for the site. d)e) Achieves a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric. <u>f) enter a community use agreement in relation to the use of the sports hub.</u>	Modified to reflect number of units as a minimum necessary to ensure consistent with national policy and optimising density. Use class reference removed, reference added to clarify that the intention is for the new sports hub to be for community use, amend part a addressing site specific vehicular access for clarity. All necessary to ensure the policy is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside density optimisation, details on transport needs, and removal of use class reference) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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MM43	68	Policy SA35	Policy SA35 – Land at Horton Farm Allocated for: Approximately <u>A minimum of</u> 1,250 dwellings (C3) including some specialist housing and self-build plots, 10 gypsy and traveller pitches, business incubation space, community building and a public park of approximately 7ha in addition to other green and blue infrastructure. Site Area: 37.9 ha Planning History: None In addition to complying with the policies in the plan, any developer of this site will be required to: a) Provide <u>safe and</u> appropriate vehicle, pedestrian and cycle access to the site from <u>Chantilly Way and Horton Lane</u> and enable the site to be served by public transport b) <u>Establish a legal mechanism to secure bus services to serve the site in the long term, this should include the provision of supporting bus infrastructure including bus priority measures.</u> bd) Provide permeability through the site for pedestrians and cyclists into and from the development to provide connectivity <u>within the site and to between</u> adjoining residential areas and associated facilities <u>including Horton Local Centre</u> and Horton County Park. ee) Provide a community building, capable of accommodating early years education provision and other community uses responding to the needs of the locality. df) Provide additional primary care capacity required to serve local needs. This could take the form of on-site provision integrated into a community building which	Modified to reflect the number of units as a minimum necessary to ensure consistent with national policy and optimising density. Use class reference removed, modified criteria a and b to ensure sustainable transport measures are adequately addressed and the policy is effective in this regard. Amend j to ensure it is positively prepared Changes necessary to ensure the policy is justified, effective and positively prepared	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number (alongside density optimisation, details on infrastructure needs, and removal of use class reference) is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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			accommodates primary health care provision alongside community health and wellbeing services required to meet the area's needs, or an equivalent financial contribution towards off-site provision of new or improvement to existing health facilities. The form of required additional primary care provision will be determined in consultation with the NHS at the time the site comes forward. eg) 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. fh) 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. gi) 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). hj) 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. ik) 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. jl) Conserve and, where possible, or enhance the setting of Grade II Listed Horton Farm House <u>through sensitive design incorporating positive elements of local character and appearance.</u> km) Ensure the site layout retains and protects veteran trees and maximises retention and safeguarding of other existing mature trees and hedgerows as part of a coherent landscaping strategy for the site.		

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			4n) Achieves a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.		
MM44	n/a	New site allocation SA36	<u>Policy SA36 – 25 Alexandra Road, Epsom</u> <u>Allocated for:</u> A minimum of 10 dwellings <u>Site Area:</u> 0.2ha <u>Planning history:</u> Application references 16/00653/OUT, 16/00595/FUL & 16/00482/OUT (all approved) <u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u> <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Alexandra Road.</u> <u>Maximise the retention and safeguarding of TPO mature trees within the site and incorporate those features in a coherent landscaping strategy for the site.</u> <u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.

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			<u>Ensure the re-use the stained-glass window from the locally listed building located on the site in any future development proposals, in accordance with the previous planning approvals for the site.</u>		
MM45	n/a	New site allocation SA37	<u>Policy SA37 – Gainsborough Road estate, Epsom</u> <u>Allocated for:</u> A minimum of 8 dwellings <u>Site Area:</u> 0.26 ha <u>Planning history:</u> None  <u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u> <u>a) Provide safe and appropriate:</u> <u>i) vehicle, pedestrian and cycle access to the East parcel from Harvester Road</u> <u>ii) vehicle, pedestrian and cycle access to the West parcel from Gainsborough Road.</u>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>b) Maximise the retention and safeguarding of TPO mature trees within and near the West parcel and incorporate those features in a coherent landscaping strategy for the site parcels.</u>		
MM46	n/a	New site allocation SA38	<u>Policy SA38 – Parking at 54 Gainsborough Road</u> <u>Allocated for:</u> A minimum of 6 dwellings <u>Site Area:</u> 0.10 ha <u>Planning history:</u> Pre-application   <u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u> <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Gainsborough Road.</u>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.
MM47	n/a	New site allocation SA39	<u>Policy SA39 – 85b Hook Road, Epsom</u> <u>Allocated for:</u> A minimum of 8 dwellings <u>Site Area:</u> 0.14 ha	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Planning history: None</u>  <u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u> <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Hook Road.</u> <u>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</u> <u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u>		Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.
MM48	n/a	New site allocation SA40	<u>Policy SA40 – Land west of Ewell By-Pass</u> <u>Allocated for:</u> A minimum of 38 dwellings <u>Site Area:</u> 0.87 ha	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Planning history: None</u> <u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u> <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from both Cheam Road to the south-west and Ewell By-Pass in the north-east.</u> <u>Maintain and enhance the footpath along the western edge of the site</u> <u>Ensure the site layout maximises retention and safeguarding of mature trees, incorporating these in a coherent landscaping strategy for the site.</u> <u>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</u> <u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u> <u>Conserve or enhance the significance and setting of the Ewell Village Conservation Area through sensitive design incorporating positive elements of local character and appearance.</u>		conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.
MM49	n/a	New site allocation SA41	<u>Policy SA41 – Conservative Club, Epsom Club and Church</u>	Additional allocation to ensure the plan is	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Allocated for:</u> Mixed use development for community uses (approximately 1,800sqm) and a minimum of 28 dwellings <u>Site Area:</u> 0.35 ha <u>Planning history:</u> No residential planning history  <u>In addition to complying with the policies in the plan,</u> <u>any developer of this site will be required to:</u> <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Church Street.</u> <u>Provide permeability through the site for pedestrians and cyclists and provide connections to the adjoining site allocation SA9 – Depot Road and Upper High Street Car Park.</u> <u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u> <u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u> <u>Maximise the retention and safeguarding of the protected mature tree within the site and incorporate this feature in a coherent landscaping strategy for the site.</u>	positively prepared and effective	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Conserve or enhance the setting of the Church Street Conservation Area and Listed Building that adjoin the site, through sensitive design incorporating positive elements of local character and appearance.</u>		
MM50	n/a	New site allocation SA42	<u>Policy SA42 – TK Maxx</u> <u>Allocated for:</u> Mixed use development to provide retail and leisure uses (approx. 3,750 sqm) and a minimum of 17 dwellings <u>Site Area:</u> 0.14 ha <u>Planning history:</u> None   <u>In addition to complying with the policies in the plan, any developer</u> <u>of this site will be required to:</u> <u>a) Provide safe and appropriate:</u> <u>i) pedestrian and cycle access to the site from Epsom High Street;</u> <u>ii) vehicle, pedestrian and cycle access from Station Approach.</u> <u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential</u> <u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Retain active ground floor retail frontages along the parts of the site that front the High Street and form part of the Primary Shopping Area for the Town Centre.</u> <u>Consider the site's prominent Town Centre location for a high-quality designed building.</u> <u>Conserve or enhance the setting and significance of the Epsom Town Centre conservation area and nearby listed buildings, through sensitive design incorporating positive elements of local character and appearance.</u> <u>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</u>		
MM51	n/a	New site allocation SA43	<u>Policy SA43 – Land R/O The Albion Public House (Mccaffertys Bar)</u> <u>Allocated for:</u> Mixed use development, a minimum of 11 dwellings and approximately 500sqm commercial, business or service floorspace <u>Site Area:</u> 0.14 ha <u>Planning history:</u> None <u>developer of this site will be required to:</u>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.

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			<u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from South Street.</u> <u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u> <u>Conserve or enhance the setting and significance of the Epsom Town Centre Conservation Area and the adjacent and nearby Listed Buildings through sensitive design incorporating positive elements of local character and appearance.</u> <u>Retention of the Grade II listed wall that forms part of the site boundary.</u> <u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u>		
MM52	n/a	New site allocation SA44	<u>Policy SA44 – Spread Eagle Shopping Centre</u> <u>Allocated for:</u> Mixed use development to provide retail and leisure uses (approximately 2,000sqm) and student accommodation (a minimum of 40 units) <u>Site Area:</u> 0.18 ha <u>Planning history:</u> Pre-application   <u>In addition to complying with the policies in the plan, any developer of this site will</u> <u>be required to:</u>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European

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			<u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Council owned car park and Town Hall to the east of site. Provide or maintain pedestrian access to the site from High Street, Ashley Road and/or The Parade.</u> <u>Retain active ground floor retail frontages along the parts of the site that front The Parade, Ashley Road and High Street and form part of the Primary Shopping Area for the Town Centre.</u> <u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u> <u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u> <u>Conserve or enhance the setting and significance of the Epsom Town Centre Conservation Area and the Grade II listed 'Spread Eagle Hotel' and 'No 89 High Street' located within the site through sensitive design incorporating positive elements of local character and appearance.</u> <u>Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the A24 and neighbouring uses.</u> <u>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</u>		site integrity are foreseen.
MM53	n/a	New site allocation SA45	<u>Policy SA45 – Auction House, Depot Road</u> <u>Allocated for:</u> Mixed use development to provide commercial, business and service floorspace (approximately 500sqm) and a minimum of 10 dwellings <u>Site Area:</u> 0.12 ha <u>Planning history:</u> None	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the

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			 <u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u> <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Depot Road.</u> <u>Provide permeability through the site for pedestrians and cyclists and provide connections into the adjoining site allocation SA9 – Depot Road and Upper High Street Car Park.</u> <u>Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.</u> <u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u>		integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.
MM54	n/a	New site allocation SA46	<u>Policy SA46 – Laine Theatre Arts</u> <u>Allocated for:</u> A minimum of 6 dwellings <u>Site Area:</u> 0.05 ha <u>Planning history:</u> None	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the

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			  <u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u> <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from East Street.</u> <u>Conserve or enhance the setting of nearby heritage assets, including the adjacent Adelphi Road Conservation Area and the Grade II listed building (Flint Cottage), through sensitive design incorporating positive elements of local character and appearance.</u> <u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u> <u>Design surface and foul water drainage to include all required measures arising from the site being located in Groundwater Source Protection Zone 1.</u>		integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.
MM55	n/a	New site allocation SA47	<u>Policy SA47 – Eclipse Business Park, West Hill</u> <u>Allocated for:</u> Mixed use development to provide commercial, business and service floorspace (approximately 1,500sqm) and a minimum of 23 dwellings <u>Site Area:</u> 0.39 ha	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Planning history:</u> Historic application for 30 flats   <u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u> <u>Provide safe and appropriate vehicle, pedestrian and cycle access to the site from West Hill.</u> <u>Undertake archaeological investigations in accordance with Policy DM13, taking account of the site's location within an Area of High Archaeological Potential.</u> <u>Conserve or enhance the setting and significance of the Stamford Conservation Area which covers part of the site, through sensitive design incorporating positive elements of local character and appearance.</u>		integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.
MM56	n/a	New site allocation SA48	<u>Policy SA48 – Cuddington Glade</u> <u>Allocated for:</u> Residential Care Home providing at least 70 bedrooms <u>Site Area:</u> 0.52 ha	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European

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			Planning history: Application reference 26/00002/FUL (awaiting determination) In addition to complying with the policies in the plan, any developer of this site will   be required to: Provide safe and appropriate vehicle, pedestrian and cycle access to the site from Cherry Tree Lane bordering the western boundary of the site. Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees both within and beyond the site boundary, incorporating these in a coherent landscaping strategy for the site. Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.		sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.
MM57	n/a	New site allocation SA49	<u>Policy SA49 – Land off Cuddington Glade</u> <u>Allocated for:</u> Minimum of 45 dwellings <u>Site Area:</u> 1.11 ha	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Planning history: None</u> <u>In addition to complying with the policies in the plan, any developer</u> <u>of this site will be required to:</u> <u>Provide safe and appropriate:</u> <u>vehicle, pedestrian and cycle access to the site from Cuddington Glade that does not result in the loss of any existing parking provision to serve the established residential dwellings that adjoin the site;</u> <u>pedestrian and cycle access to the site from the established footpath bordering the site to the North.</u> <u>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.</u> <u>Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.</u>		sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.
MM58	n/a	New site allocation SA50	<u>Policy SA50 – Land at Priest Hill</u>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Allocated for:</u> Residential-led mixed use development for a minimum of 275 dwellings, commercial and/or community uses (approximately 1,000 sqm) along with a landscaped station square <u>Site Area:</u> 4.71ha <u>Planning history:</u> Pre application (up to 530 dwellings, commercial floorspace, public open space) <u>In addition to complying with the policies in the plan, any</u> <u>developer of this site will be required to:</u> <u>Provide safe and appropriate:</u> <u>vehicle, pedestrian and cycle access to the site from Cheam Road and Banstead Road;</u> <u>pedestrian and cycle access to Ewell East Station and pedestrian access to the other established public rights of way adjoining the site.</u> <u>Provide permeability through the site for pedestrians and cyclists into and from the development to provide connectivity between adjoining residential areas, education institutions and Ewell East Station.</u>		by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Maintain vehicular access for neighbouring users including NESCOT, the neighbouring sports pitches operated by SEFRC and residential properties fronting Cheam Road.</u> <u>Provide off-site highway improvements along the Cheam Road Corridor and A24 junction to improve pedestrian and cycle infrastructure with a focus on reducing severance and improving safety & crossing opportunities.</u> <u>Provide off-site improvements to the public rights of way that run adjacent to the railway line connecting Cheam Road and Reigate Road.</u> <u>Provide financial contributions towards accessibility improvements at Ewell East Station.</u> <u>Provide commercial and/or community uses (approximately 1,000 sqm) to provide a new community hub adjacent to the Ewell East Station to serve existing and future residents and station users.</u> <u>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.</u> <u>The occupation of the development should be phased to align with the delivery of any necessary upgrades to water supply and waste water infrastructure.</u> <u>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.</u> <u>Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.</u>		

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM59	n/a	New site allocation SA51	<u>Policy SA51 – Downs Farm</u> <u>Allocated for:</u> <u>Land to the North of College Road:</u> <u>A minimum of 530 dwellings, employment hub, specialist school provision (up to 2.5ha) and public open space</u> <u>Land to the South of College Road:</u> <u>Public open space with improved pedestrian and cycle connectivity to Epsom Downs Station and playing pitches and supporting facilities.</u> <u>Site Area:</u> 27.66 ha (north), 17.92 ha (south) <u>Planning history:</u> None <u>In addition to complying with the policies in the plan, any developer of this site will be required to:</u> <u>Land to the North of College Road</u> <u>Provide safe and appropriate:</u> <u>vehicle, pedestrian and cycle access to the site from Reigate Road;</u>	Additional allocation to ensure the plan is positively prepared and effective	No. Potential implications of the allocation of a higher quanta of sites, including those covered by this modification, were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the conclusions of the Addendum Report remain valid and no further LSEs that may compromise European site integrity are foreseen.

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			<u>pedestrian and cycle access to the site from Longdown Lane and College Road.</u> <u>Establish a legal mechanism to secure frequent bus services to serve the site in the long term and provide supporting infrastructure including bus priority measures where feasible.</u> <u>Provide permeability through the site for pedestrians and cyclists to provide connectivity between adjoining residential areas and the open space at land to the South of College Road to the south of the site.</u> <u>Provide offsite highway improvements along Reigate Road and College Road to improve pedestrian and cycle infrastructure with a focus on improving safety and improving crossing opportunities.</u> <u>Provide financial contributions towards improvements at Epsom Downs Station.</u> <u>Conserve or enhance the setting of the Higher Green / Longdown Lane Conservation Area that lies to the north of the site and listed buildings located in close proximity to the site, through sensitive design incorporating positive elements of local character and appearance.</u> <u>Ensure the site layout maximises retention and safeguarding of trees covered by Tree Preservation Orders and other existing trees, incorporating these in a coherent landscaping strategy for the site.</u> <u>Provision of a new specialist school of up to 2.5ha on the site.</u> <u>The occupation of the development should be phased to align with the delivery of any necessary upgrades to water supply and waste water infrastructure.</u> <u>Provide suitable noise and vibration attenuation measures to ensure that future occupiers have an acceptable level of residential amenity given the existing adjoining business.</u>		

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>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.</u> <u>Establish a legal mechanism for the long term management of green and blue infrastructure and children's play space on the site, providing access for recreational purposes by the general public as well as residents of the development.</u> <u>Achieve a measurable biodiversity net gain of at least 20% as calculated using the latest statutory metric.</u> <u>Land to the South of College Road</u> <u>Provide public open space incorporating walking and cycling routes providing connections between College Road, Longdown Lane South and Epsom Downs Station.</u> <u>Provide playing pitches and new supporting infrastructure including changing facilities that are served by utilities and car parking for users. Vehicular access should be secured from improvements to the existing access along College Road.</u>		
MM60	70	Para. 5.3.	5.3. Table S5a below sets out the recommended mix of affordable and market homes for future developments in the borough over the Local Plan Period as set out in the HEDNA (Source: HEDNA, 2023, Table 66, p257). <i>Move table S5a into main body of text as below:</i>	Added source/reference to HEDNA table, necessary for effectiveness Table S5a concerning housing mix moved to	No. The change does not introduce any new LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?																				
				the policy wording for effectiveness																					
MM61	70	Policy S5	Policy S5: Housing mix and type Residential development will be permitted where the following criteria are met: a) The mix of tenure, type and size reflects have regard to the housing need, set out in the Housing and Economic Development Needs Assessment (2023) as detailed below, unless the applicant can demonstrate that other factors, such as site characteristics, local character and local housing need warrant an alternative approach, or any subsequent update; and b) The housing mix has regard to the size, characteristics and location of the site. Table S5a:Housing Mix <table><tr><td>Tenure</td><td>1-bedroom</td><td>2-bedrooms</td><td>3-bedrooms</td><td>4+ bedrooms</td></tr><tr><td>Market</td><td>10%</td><td>35%</td><td>35%</td><td>20%</td></tr><tr><td>Affordable home ownership</td><td>20%</td><td>40%</td><td>30%</td><td>10%</td></tr><tr><td>Affordable housing (rented)</td><td>40%</td><td>35%</td><td>20%</td><td>5%</td></tr></table> <u>Key supporting documents</u>	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%	It is necessary for effectiveness for the policy to specify the Housing Mix, the table S5 has been moved from the supporting text into the policy for effectiveness It is necessary for effectiveness to clarify criteria a and b. These have been combined and reworded New key supporting documents section	No. The change does not introduce any new LSEs that may compromise European site integrity.
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%																					

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Housing and Economic Development Needs Assessment (2023)</u>	added after Policy S5 necessary for effectiveness	
MM62	71-72	Policy S6	5.5. Housing affordability is a significant issue for Epsom and Ewell and is a key priority for the council. To help address the problem of affordability, the council is committed to enabling the provision of affordable housing for local people who cannot meet their housing needs on the open market. <u>Affordable housing may also include housing that is for essential local workers, which includes public sector employees such as NHS teaching staff. A full definition of affordable housing and essential local workers is provided in the glossary.</u> <i>New paragraphs inserted after para 5.7.</i> <u>The policy requires varying levels of affordable housing provision at an overall percentage of dependent upon the location of the development and the use of the land to be developed as defined within the policy.</u> 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. <u>An example of where the Council may consider it appropriate to 'cluster' affordable dwellings together would be for flatted schemes where a registered provider would benefit from the affordable dwellings being located together for management and maintenance reasons.</u>	It is necessary for effectiveness that reference has been added to staff accommodation and essential local workers housing Additional supporting text necessary for effectiveness to set out how affordable housing on site should be distributed Modification necessary to correct policy title to	No. Provision of affordable housing does not give rise to new air quality, hydrological, recreational or urbanisation effect impact pathways that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			5.17. Policy S2 Sustainable and Viable development provides further detail on the approach the council will take in cases where development proposals are not fully policy compliant. Vacant building credit 5.18. Vacant building credit, as described in national planning guidance, will be applied to developments where a vacant building is either converted or demolished and may result in a reduction in the required affordable housing. The credit does not apply when a building has been abandoned. Policy S6: Affordable Housing 1) The council will require proposals to provide affordable homes on all residential developments comprising self-contained units, as follows: On greenfield sites <u>On site allocations SA31, SA32, SA33, SA34, SA35, SA48, SA49, SA50, SA51 as defined on the policies map and on any green belt sites developed for housing in accordance with national policy:</u>	ensure policy is positively prepared Delete as repeats national policy It is necessary for the policy to be modified to include text to specify the amount of affordable housing required on the site allocations contained within this plan and greenfield sites in order to be consistent with national policy. Whilst it is not envisaged that any other development on green belt sites would come forward, the text is necessary to reflect the affordable housing expectations	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			a) Schemes of 10 or more new units or where the site has an area of 0.5 hectares or more, on-site provision of at least <u>450%</u> affordable housing of the gross number of dwellings; On greenfield sites <u>located within the defined urban area as identified on the policies map:</u> ab) <u>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;</u> On all other sites bc) Schemes of 10 or more new dwellings or where the site has an area of 0.5 hectares or more, on-site provision of 30% affordable housing of the gross number of dwellings; 2) Where a development meets the criteria detailed in 1), the preferred mix for affordable housing provision on-site is as follows: 30% affordable home ownership; 70% affordable rented (with half to be secured as social rented) 3) Commuted sums will be charged for any fractional number of affordable units to be provided on-site equivalent to that part of the residential dwelling;	identified by the Framework Reworded point 4 to reflect supporting text and ensure policy is justified	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			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. <u>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;</u> 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) <u>The affordable housing requirements set out in this policy have been demonstrated to be viable through our Local Plan Viability Assessment. Policy S2 Viable Development provides details on where a site specific viability assessment may be accepted at the application stage.</u> 6)7) Where a site has been sub-divided or is not being developed to its full potential, to circumvent the affordable housing thresholds detailed in criteria 1, the Council will seek a level of affordable housing provision that would have been achieved on the site as a whole had it come forward as a single scheme. 7) In accordance with Policy S2, viability will only be considered in exceptional circumstances and where there are significant additional costs not anticipated through the viability evidence that has informed the Local Plan.	It is necessary for additional text to clarify viability evidence in order to be effective and consistent with national policy	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Key supporting documents Housing and Economic Development Needs Assessment (2023) Local Plan Viability Assessment (2023) <u>Local Plan Viability Update Note (2024)</u>	For effectiveness added viability evidence under 'key supporting documents'	
MM63	74-75	Policy DM1	5.19. It is important that new homes are built to a high standard to meet the needs of the borough's residents. New homes should be comfortable, functional and adaptable. They should also minimise the impact they have on the environment, climate change and pressure they put on water supply. As such, this policy should be read in conjunction with policy DM10 Building Efficiency <u>Emissions and Energy</u> Standards. Policy DM1: Residential Space Standards 1) Proposals for new residential dwellings (Use Class C3) will be permitted where: a) the internal space complies with or exceeds the nationally described space standards or any future equivalent. b) the minimum requirements for private outdoor space as set out below are satisfied: i) a 5 sq m balcony within flatted development accessible from the main habitable room ii) a dedicated private garden for houses.	Necessary for effectiveness in terms of the name change to policy DM10 Necessary for effectiveness to remove the use classes to future proof the policy	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			Parts 2 and 3 (i) and (ii) of the policy remain the same Key supporting documents Technical housing standards nationally described space standards <u>Statutory guidance - Technical housing standards- nationally described space standards</u> Approved Document M – Access to and use of buildings Volume 1: dwellings <u>Statutory guidance – Access to the use of Buildings- Approved Document M</u>	References to the documents are set out in full for effectiveness	
MM64	78-79	Policy S7	5.31. Some housing may need to be designed for people with specialist needs. This includes older citizens, those with disabilities and , the neurodiverse, students or families more suited to multi-generational communal living. 5.33. Evidence on how this translates to need for the required number of specialist homes or <u>care home</u> 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 <u>minimum</u> need for 75446 affordable extra care units up to 2035. <u>With respect to care home provision, SCC predicts an undersupply of 185 residential care home beds and an undersupply of 149 nursing home beds, based upon operational care home provision as at January 2024. SCC publish up to date figures for need in their Commissioning Statement which should be considered at the time of submitting a planning application, and 355 nursing home beds. The HEDNA suggests that a mid</u>	Necessary for effectiveness, and to ensure that the policy uses appropriate definition for specialist housing Necessary for effectiveness to include appropriate definitions & specialist care provision	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			point between the SCC figures and its outputs (which arose due to a difference in prevalence rates) be used as the actual need figure, which is 308 residential units and 180 nursing care beds. Policy S7: Specialist Housing 1) Development proposals for specialist accommodation, such as homes for older people, people with disabilities <u>and</u> students or the neurodiverse will be permitted where: a) there is robust evidence to support that it meets an identified need in the borough; b) an appropriate tenure mix is provided (where applicable); c) sites have good access to facilities, services and public transport; d) they will not lead to a concentration of similar uses that would be detrimental to the character and function of an area and/or residential amenity; e) it will not significantly impact on the capacity of public services, including health and social care; <u>and</u>	Necessary for effectiveness text modified with regard to specialist housing definition Deletion of criteria g and h as not necessary to make policy effective and justified Modified part 2 to be more effective and removed use class to ensure policy is consistent with national policy	

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			f) it can be demonstrated that the development is designed and managed to provide the most appropriate types and levels of support to its target resident. g) it can be demonstrated that revenue funding can be secured to maintain the long term viability of the scheme; and h) the scheme is supported by the relevant statutory agencies. 2) Larger-scale new residential developments (over 200 C3 dwellings) will be required to incorporate <u>some</u> specialist accommodation, in line with the above criteria 1, unless there is reasonable evidence that it is not feasible. 3) Proposals that may result in the loss of specialist housing or accommodation will not be considered acceptable unless it can be demonstrated that there is no longer a need for such accommodation in the borough, or equivalent alternative provision is being made available locally through replacement or new facilities.		
MM65	80	Policy DM3	5.39. Residential floorspace including dwellings (Use Class C3), residential institutions (Use Class C2), and Houses in Multiple Occupation (Use Class C4) will be retained where possible. The policy sets out where there are exceptional circumstances that might justify their loss. 5.40. The loss of Use Class C3 dwellings to alternative residential types will generally be supported provided the new provision meets the identified needs of the borough. The applicant will need to demonstrate there is a need for the use and the proposal does not result in a disproportionate provision of certain types of housing.	Necessary for effectiveness to remove use classes to future proof the policy	No. The change does not introduce any new LSEs that may compromise European site integrity.

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MM66	82-85	Policy S8	Transit accommodation provision 5.49. The provision of transit accommodation on well travelled routes across Surrey can help reduce incidences of unauthorised encampments. Careful consideration should be given to the location of a transit site to ensure it is on a well established travelling route. Policy S8 therefore sets the criteria that will be used to determine applications for transit use on unallocated land. Assessing applications for Gypsy and Traveller provision 5.50. It is recognised that there are unlikely to be sites which would meet every one of the criteria detailed in Policy S8. A 'best fit' approach will therefore be adopted. 5.51. It is expected that new pitches and plots should have adequate utility services, amenity space and parking, safe turning space and be in areas with reasonable access to schools, health services and local services. The impact of new sites on existing communities and how well proposals can be integrated is an important consideration in the determination of applications for Gypsy and Traveller provision. 5.53. Provision of 'transit' accommodation for friends and family to visit existing gypsy, traveller and travelling showpeople sites should be dealt with using planning conditions specifying the number of days the site can be occupied by more than the allowed number of caravans (which permits visitors and allows attendance at family or community events). <u>It is recognised that on occasion, such as family and community events, there may be visitors to gypsy, traveller and showpeople sites which could exceed the permitted number of caravans on a site. Therefore, planning conditions will be used specifying the number of days the site can be occupied by more than the permitted number of caravans.</u>	Amended text for clarity and effectiveness Necessary for clarity and effectiveness to reword and remove 'transit'	No. This modification is an alteration of wording for clarity, effectiveness and to avoid repetition. The change does not introduce any new LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Policy S8: Gypsies, Travellers and Travelling Showpeople Safeguarding existing supply 1) Land authorised for permanent gypsy, traveller and travelling showpeople accommodation will be safeguarded from alternative development. Proposals which involve a change of use of the land or a loss of pitches or plots will not be permitted unless it can be evidenced that they are no longer required or new suitable equivalent provision is made. Planning applications 2) Development proposals for gypsy and traveller and travelling showpeople accommodation and ancillary buildings, will be permitted where: a) The use of the land is of a scale appropriate to the location; b) the site is capable of being provided with necessary on-site services; c) the site is conveniently located for access to schools, medical services and other community facilities; d) the site has a safe vehicular and pedestrian access from the public highway and adequate provision for parking; turning and safe manoeuvring of vehicles within the site;	Modified Criteria f) to be worded positively around appropriate landscaping. Additional detail about access to utilities provided in Part 4) for clarity, remove criteria from part 4 C, not relevant, criteria 2f has been amended for conciseness, remove part 5 as covered by part 1. All necessary for effectiveness	

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			e) the site provides adequate space for storage, play and residential amenity; f) the site is appropriately not enclosed with hard 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 i) ancillary buildings are of an appropriate scale and size. 3) Proposals for mixed residential and business activities will be assessed on a site-specific basis, taking the above criteria into account. 4) Proposals for transit gypsy and traveller accommodation will be permitted where the proposal: a) complies with the above <u>Part 2</u> criteria (except for c, <u>e, f and h</u>); b) can demonstrate it is located on an established travelling route.		

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			<u>c) provides basic utilities including those for the supply of water and disposal of waste water.</u> e) 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 65) 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. 76) The number of pitches and plots required will reflect the level of local need within the borough. However, sites will have a minimum of 3 pitches/plots and should contain the maximum number of pitches/plots that can reasonably be accommodated on the site.	The Plan will meet the identified need through the site allocations proposed. As a result, this text is not necessary	

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MM67	86	Policy S9	6.1. At a strategic level, the Local Plan promotes sustainable economic development within the borough and the surrounding region (e.g. the "Gatwick Diamond"). However, for the purposes of this policy, economic development concerns mostly developing employment opportunities and improving prosperity for all in the borough. The council has carried out a robust and objective assessment of its employment needs which is detailed in the HEDNA. This assessment takes account of economic and job growth forecasts over the Local Plan period, but also local intelligence on demand for employment floorspace to meet the needs of established businesses. The HEDNA shows that there is demand for at least 41,464sqm of additional employment floorspace in the borough to meet the needs of existing businesses and to cater for new businesses. <i>6 new paragraphs inserted after para. 6.1.</i> <u>The Council has also carried out a retail needs assessment which concludes that there is no identified need to plan for additional convenience and comparison goods retail floorspace provision.</u> <u>Epsom Town Centre contains concentrations of office accommodation in addition to other employment generating uses such as retail, health and education provision which make a significant contribution towards the borough's economy.</u> <u>Kiln Lane and Longmead Industrial Estates are the two largest employment sites, providing approximately 25ha of employment land between them. Although the majority of uses at the site are industrial, warehousing & storage and distribution, they also accommodate some office uses. In addition, there are non-traditional</u>	Necessary for clarity to modify supporting text setting out the general strategy of intensification and new development where possible to ensure the policy is positively prepared and justified	No. Potential implications of the allocation of over 41,464sqm of additional employment floorspace as assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, Policy S9 remains in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.

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			<u>employment uses established at the site that fall within the Sui Generis use class, including vehicle sales and repairs, builders' merchants and trade counters.</u> <u>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.</u> <u>To help support a prosperous economy, this policy designates Kiln Lane and Longmead Industrial Estates as strategic employment sites (as defined on the policies map) which provides the highest degree of protection and actively encourages the development, regeneration and intensification of these sites to provide modern floorspace for employment generating uses.</u> <u>The borough has a successful racehorse training industry associated with although separate from the Epsom Downs Racecourse, a nationally significant sporting venue. To ensure the long-term sustainability of these and address some of the challenges these industries face, it is important to safeguard land and support appropriate development proposals.</u> <u>6.2. In this respect the key objective of the plan will be to make provision for a range of sites to meet the needs of different types of business and tourism, to encourage diversification in the local economy. Such diversification can include adapting to new ways of working, changing demands for services and the night time economy. The borough has a vibrant cultural and creative sector, with an established theatre and</u>	Necessary for clarity and effectiveness to define the two industrial areas in the policy	

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			<u>two cinemas in Epsom Town Centre, and the University for the Creative Arts and Laine Theatre Arts and the Council is supportive of further developing this sector.</u> 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 <u>Protecting and safeguarding the Strategic Employment sites at Kiln Lane and Longmead Industrial Estates (as defined on the policies map) for employment generating uses to support job creation and meet the needs of the economy.-The development and intensification of these sites will be supported to provide floorspace for Employment Generating Uses that meets the needs of the market-</u> 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- <u>Supporting the development of sites within Epsom Town Centre to provide floorspace that supports jobs creation and meets the needs of the economy. by enabling new and established businesses to grow;</u> 3) Safeguarding land <u>and supporting appropriate development proposals which help for the horse racing industry to secure the long-term sustainability of the sector; Epsom Down Racecourse and racehorse training sector.</u>	Necessary for clarity and effectiveness to modify text to set out the strategy for the protection and intensification of the industrial sites Necessary for clarity and effectiveness to modify the wording of part 1 to be more specific, wording moved from policy DM7 which addresses the loss of employment land Part 5 and 6 of the policy have been	

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			4) Supporting the visitor and night-time economy; 5) Supporting the creative and cultural industries and further and higher education providers <u>by protecting existing and enabling the provision of new or extended venues and facilities where appropriate.</u> ÷ 6) Protecting existing cultural venues, facilities and uses where appropriate and supporting the development of new cultural venues in Epsom Town Centre. <u>Key supporting documents</u> <u>Housing and Economic Development Needs Assessment (2023)</u> <u>Longmead and Kiln Lane Industrial Estates Economic Value Report (2022)</u> <u>Retail and Commercial Leisure Needs Assessment Update (2021)</u>	combined for effectiveness and also reworded for the same reason Necessary for clarity and effectiveness to ensure policy is positively prepared Added key supporting documents after the policy for consistency	
MM68	87-88	Policy S10	6.4. A strong town centre policy enables a full range of town centre uses to be implemented within these sustainable locations but also allows the council to reject proposals that do not add to the vitality and viability of the town centre or which conflict with other policies and objectives. Town centre uses include, <u>residential</u>, retail, leisure, entertainment facilities, intensive sport and recreation uses, offices, arts, culture and tourism development. Policy S10: Retail Hierarchy and Network	Necessary for clarity and consistency with national policy to define town centre uses	No. The land usage referred to in this policy does not deviate from the use of land assessed in the HRA Addendum. As such, Policy S10 remains in-keeping with the findings of the Addendum Report and no further

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			1) To ensure the long-term vitality and viability of the centres, the council will apply a 'town centre first' approach to proposals for retail, leisure and other main town centre uses. Development should be appropriate to the size and function of the centre within which it is to be located. The retail hierarchy includes the defined town and local centres <u>and Neighbourhood Parades</u> (as shown on the policies map). The wider retail network also includes other retailing locations across our area. 2) The overall hierarchy and network is defined as follows: a) Town Centre: Epsom Town Centre b) Local Centres: Ewell Village and Stoneleigh Centre c) Neighbourhood Parades: • Castle Parade, Ewell • Chessington Road / Green Lanes • Chessington Road / Plough Road • Chessington Road / Ruxley Lane • Gatley Avenue / Ruxley Lane • Horton Local centre • Kingston Road / Bradford Drive • Kingston Road / Ruxley Lane • Manor Green Road, Epsom • Poole Road, Epsom • Pound Lane, Epsom • Rosebery Parade, Kingston Road • Vale Road, Worcester Park	Necessary to add reference to neighbourhood parades in order to make the plan effective	LSEs that may compromise European site integrity are foreseen.

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			Waterloo Road, Epsom		
MM69	89	Policy DM4	6.11. Within Epsom Town Centre, Commercial, Business and Service Uses (Class E of the use classes order) are 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 <u>at the planning application stage</u> to avoid over concentration of a specific type of use. <u>Proposals will be considered on their merits subject to the provision of sufficient information to assess the potential impacts on amenity, diversity, vitality and viability of the proposed use (including cumulative impacts).</u> 6.12. Within the local centres, a range of <u>Commercial, Business and Service Uses</u> Class E uses and other town centre uses will be supported and where the loss of a <u>Commercial, Business and Service Uses</u> Class E use is proposed, the proposed use will need to demonstrate that it maintains an active frontage and a range and mix of products and services in the centre and would not harm the vitality and viability of the local centre. Policy DM4: Primary Shopping Areas and Retail Frontages Epsom Town Centre	Use classes removed for effectiveness, additional text provided in the supporting text to clarify how we would assess Policy Criteria1b over concentration Changes necessary in order to make the policy positively prepared and effective	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			1) Within Epsom Town Centre the Primary Shopping Area (as defined on the policies map), will remain the focus for retail activity and other town centre uses. Within the Primary Shopping Area: a) Within the primary frontage (as defined on the policies map) at ground floor level development within <u>Commercial, Business and Service use</u> use class E will normally be permitted; b) Within the secondary frontages (as defined on the Policies Map), at ground floor level, development within <u>Commercial, Business and Service Use</u> Use Class will normally be permitted. Sui Generis uses suited to a town centre, <u>Learning and non-residential Class F1 and Institutions and Halls or meeting places for the principal use of the local community Class F2(b)</u> 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 <u>and</u> 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 <u>Commercial, Business and Service</u> 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 <u>Commercial, Business and Service</u> Class E use;	Modified references to use classes in order to future proof the policy Necessary changes made in order to ensure the policy is effective	

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			b) Opportunities to reconfigure or reuse the site to retain its current use or another <u>Commercial, Business and Service Class E</u> use have been exhausted; c) The site has been marketed in accordance with Appendix 5; d) The proposed alternative use would not adversely affect the vitality and viability of the town centre. Stoneleigh and Ewell Local Centres 3) Within the Local Centres (as defined on the policies map) the Council will support: a) a A range of <u>Commercial, Business and Service uses</u> Use Class E and other appropriate town centre uses b) Development proposals involving a change of use from <u>Commercial, Business and Service use Class E</u> will not be permitted unless the alternative use maintains an active frontage and a range and mix of products and services in the centre and would not harm the vitality and viability of the local centre c) The efficient use of upper floors for main town centre uses or residential use where it can be demonstrated that the loss of this floor space would not impact the viability of the ground floor use		

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MM70	93-94	Policy DM6	6.20. The boundaries of the neighbourhood parades are shown on the Policies Map. Policy DM6: Neighbourhood Parades and Isolated Shops 1) Within the neighbourhood parades <u>(as defined on the Policies Map)</u>, development proposals will be permitted providing they satisfy all of the following criteria: a) they are appropriate to the scale and function of the parade b) they maintain or enhance the vitality and viability of the parade c) if at ground floor level: i) they provide an active frontage, such as a shop front or window display, which is in keeping with the character of the centre/parade; ii) they would contribute to range of retail service and community uses which provide for the day to day needs of local people; and iii) The proposal does not result in an over concentration of a particular use. 2) Residential development at first floor level or above will be supported, subject to having safe and convenient access and not inhibiting the functioning or viability of the ground floor use. 3) The loss of main town centre uses at ground floor to other uses, will only be permitted where it can be demonstrated that the existing use is no longer viable. Such proposals must meet the above criteria and be supported by evidence that demonstrates active and appropriate marketing for a period of at least 12 months.	Not necessary – wording to be included within policy wording Necessary to provide clarity and effectiveness, modified text to signpost to neighbourhood parades as defined in the policies map	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			4) Proposals to change the use of isolated shops will only be permitted where the unit has been vacant and there is evidence to demonstrate active and appropriate marketing for a period of at least 12 months		
MM71	95-96	Policy DM7	Policy DM7 – <u>Loss of Employment Land</u> 6.24. The borough's employment sites make a valuable contribution towards supporting economic growth within the borough and wider sub region. There are a wide range of these employment sites dispersed <u>across the borough, both within the urban area and Green Belt (as defined on the policies map)</u>. within the borough's urban area, with concentrations of office accommodation in Epsom Town Centre and the Local Centres. 6.25. Kiln Lane and Longmead Industrial Estates are our two largest employment sites, providing approximately 25ha of employment land between them. Although the majority of uses at the site are industrial, warehousing & storage and distribution, they also accommodate some office uses. In addition, there are non-traditional employment uses established at the site that fall within the Sui Generis use class, including vehicle sales and repairs, builders' merchants and trade counters. 6.26. The HEDNA recommends securing warehousing and general industrial floorspace supply in key industrial estates of the borough and ensuring the appropriate type and size office accommodation is provided (generally smaller serviced office accommodation. This is to meet future needs for employment floorspace over the Local Plan Period. 6.27. To help support a prosperous economy, the policy designates Kiln Lane and Longmead Industrial Estates as strategic employment sites (as defined on the	Title modified, supporting text be modified to clarify it is specific to non-strategic employment sites outside of Longmead/Kiln La Deletion necessary to remove any unnecessary duplication from another policy Necessary for effectiveness	No. Loss of employment land is not anticipated to give rise to any new LSEs that may compromise European site integrity.

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			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. <u>Policy S9 defines the boroughs strategic employment sites, which are safeguarded for employment generating uses. However, there are a wide range of</u> Employment areas outside of the defined strategic employment sites beyond the strategic employment sites that make a valuable contribution towards the economy of the borough and it is for this reason that the policy DM7 includes a criteria-based policy for assessing proposals that would result in the loss of <u>employment</u> floorspace. Policy DM7: <u>Loss of</u> Employment Land Strategic Employment Sites To contribute towards meeting the future economic growth needs of the borough, Kiln Lane Industrial Estate, Longmead Industrial Estate (as defined on the Policies Map) are designated as Strategic Employment Sites, to be afforded the highest protection and safeguarding for Employment Generating Uses. The development and intensification of these sites will be supported to provide floorspace for Employment Generating Uses that meets the needs of the market. Outside of the Strategic Employment sites	Deletion necessary to remove any unnecessary duplication from another policy	

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			1) The loss of floorspace occupied by employment-generating uses <u>beyond the strategic employment sites as defined on the policies map within the urban area</u> 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 <u>evidenced by at least 12 months of continuous marketing evidence</u>; and c) the site is no longer suitable for its existing use or other employment uses.	Added marketing period into the policy to ensure the policy is effective	
MM72	97-98	Policy DM8	<u>Policy DM8 – Racehorse Training Zone Epsom Downs Racecourse and the Racehorse Training Industry</u> 6.31. The borough has <u>long been associated with horse racing, being home to Epsom Downs Racecourse, a nationally significant sporting venue, and a successful racehorse training industry. associated with the Epsom Downs Racecourse, a nationally significant sporting venue located within the Green Belt. The area is one of only two locations in the UK where both a racecourse and racehorse training co-exist. The Council is supportive of the industry, recognising its historic links with the area and the value it has to the local and wider economy. Policy S9 is reflective of this.</u> <u>Epsom Downs Racecourse is internationally renowned as the home of the Derby, flat racing’s ‘blue riband’ event and currently holds 11 racing fixtures per annum. While horseracing is the core activity, the racecourse also operates as a key</u>	Policy DM8 and the supporting text has been modified to accurately reflect the significance of the Racehorse training industry in Epsom which is necessary for effectiveness and to ensure the plan is positively prepared	No. Potential implications of additional development within the Green Belt were considered in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated; thus the conclusions of the Addendum Report remain valid and no new LSEs that may compromise European

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			<u>meetings, conferences, events and functions venue, which is important to both its long-term economic viability and the local economy. The Racecourse Area is defined on the Policies Map.</u> Surrounding the racecourse itself (as defined on the Policies Map) are the nationally important racehorse training grounds, <u>located in Epsom and Walton Downs</u> which make a positive contribution to the economy and sporting heritage of the area. 6.32. There are several racehorse training facilities / stable complexes <u>yards</u> in the borough (and neighbouring boroughs) which are well-located to support the ongoing use of the training grounds, <u>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.</u> Both the racehorse training grounds and the racehorse training yards comprise the <u>Racehorse Training Zone, which is defined on the Policies Map.</u> <u>The Racecourse Area and Racehorse Training Zone are located within the Green Belt.</u> <u>Epsom and Walton Downs, where the training grounds are located, are privately owned and are managed by the Epsom and Walton Downs Conservators through an Act of Parliament. The principal role of the Conservators is to:</u> <u>• Enable the training of racehorses on the Downs until midday</u> <u>• Preserve the Downs in their natural state of beauty</u> <u>• Maintain public rights of access</u>		site integrity are foreseen.

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			• <u>Ensure that the various users respect each other's rights and the Down environment</u> <u>There are strong economic links between the training yards, training grounds and the maintenance of Epsom and Walton Downs. The loss of racehorse training yards within the Racehorse Training Zone is harmful to the ongoing viability of the racehorse training grounds, which could negatively impact on the economy, sporting heritage of the area, and long-term management of Epsom and Walton Downs. For this reason, policy DM8 seeks to ensure the ongoing availability of suitable racehorse training yards to sustain the long-term viability of the industry, with losses being resisted unless there is clear evidence that there is no realistic prospect of the use of the site as a racehorse training yard continuing or such a use becoming re-established in the future. Marketing periods of no less than 24 months will be required by a recognised agent specializing in the racing sector property market. Further details on marketing requirements are contained in Appendix 5.</u> 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. <u>It is recognised that the racehorse training industry requires specific supporting infrastructure to effectively function. This includes but is not limited to on-site/nearby staff accommodation, horse walks, gallops, paddocks and horse walkers.</u> In the case of development or alterations to <u>racehorse</u> training yards, development should be designed in line with the British Horseracing Authority's requirements.		

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			<i>3 new paragraphs inserted following para 6.33</i> <u>The occupation of any staff accommodation should be restricted by condition and/or legal agreement as appropriate, to solely be for staff to ensure the general day to day operations and management of the horseracing/racehorse training industry use.</u> <u>Access routes to and from the racehorse training yards and training grounds are identified on the Policies Map as Racehorse Movement Corridors. There is the potential for conflict between racehorses and other road users along parts of some routes. These are highlighted on the Policies Map. The Council will support schemes to improve the safety of these routes for horses, pedestrians and other road users.</u> 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. <u>Policy DM8: Racehorse Training Industry Epsom Downs Racecourse and Racehorse Training Industry</u>		

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			<u>Racecourse Area</u> Within the extent of the racecourse <u>area</u>, as <u>defined</u> 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. <u>This may include suitable non-racing development to support the long-term viability of the racecourse.</u> <u>Racehorse Training Zone</u> Within the Racehorse Training Zone, <u>as defined</u> identified on the Policies Map: Proposals which facilitate the long-term or future use of the site <u>for the racehorse training industry and/or as a racehorse training yard</u> racing stable and/or for the racehorse training industry will be supported, <u>subject to Green Belt considerations. This may include the development of new facilities, such as infrastructure to support the industry, and/or the expansion/reconfiguration of existing facilities.</u> Any proposals resulting in the loss of specific facilities which would support the long term or future use of the site as a <u>racehorse training yard</u> racing stable will be resisted. The change of use or redevelopment of existing racehorse training <u>yards</u> for alternate uses not in connection with the horse racing / racehorse training industry will not be permitted unless evidence has been provided that:		

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			i) Marketing of the site for the horse racing sector has taken place for a period of at least 2448 months, at a reasonable market value with a recognised agent specializing in the racing sector property market; and, ii) <u>There is the opportunity for the site to revert to a racehorse training yard or uses in connection with the racehorse training industry in the future or that such opportunities to enable this have been fully explored and exhausted. Opportunities to reconfigure and reuse or redevelop the site so that it can revert to racehorse training that supports the racehorse training industry in the future have been exhausted</u> <u>Racehorse Movement Corridor</u> Anyll proposals, regardless of the type of development, should demonstrate that it <u>they</u> will not adversely affect the <u>Racehorse Movement Corridor, as defined on the Policies Map, in terms of the safety of racehorses travelling between training yards and the training grounds and the racing stable yards</u> by virtue of the traffic generation from or the design of the development and provide mitigation where there is an impact. <u>4) Proposals which would improve the safety of horses, pedestrians and other road users along these routes, particularly those where the potential for conflict has been identified (as defined on the Policies Map), will be supported.</u>		

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MM73	99-100	Policy DM9	6.38. New visitor accommodation will be supported in areas with good access to frequent and direct public transport and amenities in the borough such as identified town or local centres. This will focus development in parts of the borough where access to public transport can be optimised. which are well served by public transport, this includes proximity to rail stations or frequent bus services. 6.39. The occupation of new tourist accommodation will be restricted using conditions or legal agreements to ensure visitor accommodation is for tourist use and not permanent residential use. Policy DM9: Visitor Accommodation 1) Planning permission will only be granted for the development of visitor accommodation in the following locations: <u>1) Epsom Town Centre, 2) Local Centres, on sites allocated for that purpose, and 3) in locations which are well served by public transport</u> 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 <u>permanent</u> loss of residential dwellings; and	Modified text to clarify the need for visitor accommodation to be located close to public transport for effectiveness and remove unnecessary text about the use of conditions Necessary for clarity and effectiveness to modify part 1 to clarify the locations where visitor accommodation will be granted Added text to clarify that the policy applies to the permanent loss of residential to take	No. The change introduces no further LSEs that may compromise European site integrity.

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			c) the accommodation will not result in an unacceptable level of noise and disturbance to nearby residents. 3) Planning permission will only be granted for proposals that result in the loss of visitor accommodation and other short stay accommodation when any of the following criteria are met: a) no other occupier can be found following a realistic effort to market the premises for a period of at least 12 months, for continued use as visitor accommodation (whether or not of the same form of the existing use); and b) evidence of non-viability is submitted.	into account short term/temporary forms of visitor accommodation	
MM74	101-102	Policy S11	S11 Design and Heritage <u>7.1. High quality</u> dDesign is essential to retaining the borough's distinct sense of place, as stipulated in the plan's vision and strategic objectives. In addition to As well as the appearance of how development "looks" and achieving "beauty", design is also a crucial to <u>health and well-being</u>, sustainable development, climate change, health and other factors which are important for the borough. <i>Three new paragraphs to be inserted following para. 7.1</i> <u>The borough has a rich, varied and evolving history, which contributes significantly to its sense of place and identity. Our relationship with history is characterised in no small part by the built environment, particularly by its "heritage assets" (as defined by the national planning policy), which also make an important contribution to the quality of the borough's townscape.</u>	Necessary changes made to align with national planning policy	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			<u>The Town of Epsom and village of Ewell have evolved over time which has influenced their character and appearance, with historic cores containing listed buildings. Major periods of urban growth took place in the 1930s and 1950s. The predominant housing type constructed was low density semi-detached suburban housing. Development from the 1950's onwards is more diverse with many areas of smaller infill, some modern developments in Epsom Town Centre and more recently the redevelopment of the hospital cluster sites. The character and appearance of development is therefore key to how development integrates into its surroundings.</u> The Council is in a strong position to require good and efficient design from development. The viability assessment of the plan has been conducted in the context of market conditions which are very buoyant in this part of England. Therefore, proposals will be required to demonstrate high quality design. 7.2. It is therefore very important that the borough encourages the highest standards of design in all new developments, and a design policy is considered a strong foundation on which to do this. Of particular importance is the need for development to make efficient use of land, due to the rich variety of protected land use designations unique to the borough, which are under pressure due to high demand for development. The council considers "efficient use of land" to mean, for major development (as defined by the Town and Country Planning Act etc.) a minimum of: • 80 dwellings per hectare in Epsom Town Centre (as defined on the Policies Map) • 60 Dwellings per hectare) near public transport hubs beyond Epsom Town Centre, and	Necessary additions for effectiveness as Policy S13 Heritage will be deleted and combined with this policy Deleted text as density standards moved to policy wording to ensure policy is positively prepared	

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			* 40 dwellings per hectare in the remaining defined urban area as defined on the policies map other urban areas. 7.3. The council is in a strong position to require good and efficient design from development. The viability assessment of the plan has been conducted in the context of market conditions which are very buoyant in this part of England. Therefore, proposals will be required to demonstrate good design. This policy complements the National Design Guide and the National Planning Policy Framework, which provides further context and principles with regards to design expectations. 7.4. This policy complements the National Design Guide and the National Planning Policy Framework, which provides further context and principles with regards to design expectations. It should also be recognised that "good design" is not only the domain of this policy, but complemented by others in this plan, and should not be treated as a policy to be traded-off against. To provide further assistance, the Council may provide further prescriptive guidance by producing its own design codes in the future, with which compliance will be expected. The Council will encourage developers to engage in the Design Panel Review process to help improve the design quality of new developments in the Borough. Design South East provides this service and it is recommended that the panel are appointed as early as possible in the scheme's development. S11 Design and Heritage The design of development <u>The Council will require high quality and appropriate design from development</u> of all scales (including extensions, alterations and	Necessary for effectiveness and to ensure that the supporting text aligns with national policy	

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			conversions). <u>Proposals</u> should be appropriate in relation to the character, appearance and functioning of the built and natural environment by: a) making efficient use of land; and a) <u>Optimising the potential of the site to accommodate an appropriate amount and mix of development</u> b) being of appropriate use, scale, mass, proportion, detailing, material, layout and siting; and <u>c) enhancing (as far as possible) the borough's cultural, historic, architectural and townscape character, protecting the character of historic places and the significance of designated heritage assets; and</u> d) respecting the scale, appearance, <u>building lines</u> and location of buildings, spaces and visual amenity of the surrounding area; and <u>e) having a positive impact on public realm by enhancing the quality of the existing public realm and maximising opportunities to create new public realm where appropriate; and</u> <u>f) creating a sense of place through provision of attractive soft landscaping and open space where appropriate; and</u> <u>g) maximising opportunities for natural security through layout and design by incorporating secured by Design Standards; and</u>	Necessary modifications for greater clarity including in relation to efficient use of land, appropriate densities for different locations, reference to the design code. Changes made to the policy to ensure it is effective and consistent with national policy	

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			<u>h) demonstrating how the scheme has been developed in accordance with the principles set out in the National Model Design Code and</u> <u>e) i) maximising opportunities for integrating passive design principles, including orientation, glazing and shading.</u> <u>d) i) where appropriate, providing well structured, practical and attractive areas of soft landscaping and open space.</u> <u>All development should make efficient use of land, with major schemes that include residential uses expected to achieve the following minimum densities dependent upon their location:</u> <u>i. Epsom Town Centre (as defined on the policies map) 80 dwellings per hectare</u> <u>ii. Sites within 400m of a rail station and / or high frequency bus corridor (as defined in the glossary) beyond Epsom Town Centre 60 dwellings per hectare</u> <u>iii. The remaining urban area (as defined on the policies map) 40 dwellings per hectare</u> <u>On a case-by-case basis, it may be appropriate for larger developments to be shaped by a design review panel process proportionate to their scale and significance</u> <u>Key supporting documents</u>	Key supporting document added for	

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			<u>National Model Design Code</u>	consistency with other policies	
MM75	103	Policy S12	DM24 S12-Amenity Protection 7.7 Overlooking from public rights of way, play areas and neighbouring properties should be taken into account in any development proposal. The layout and orientation of buildings should take advantage of sunlight and should not block daylight to habitable rooms, dominate or enclose neighbouring residencies. There is an expectation that residential developments will have a separation distance of at least 20m between elevations (rear to rear), unless it can be demonstrated that this would not harm residential amenity. <u>DM24 S12-Amenity Protection</u> 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: <u>Have an acceptable impact on the living environment of occupiers of existing residential properties and / or provide adequate living conditions for future occupiers of residential properties; and</u> <u>Mitigate privacy and overlooking through the provision of a minimum separation distance of 20m between residential properties unless it can be demonstrated that</u>	Changed from strategic to non-strategic policy as the policy does not meet the relevant tests of the Framework Removed text as now moved to policy wording to ensure it is effective Moved reference to separation distances from supporting text to ensure the policy is effective Changes made to the policy to ensure it is positively prepared, effective and consistent with national policy	No. The change introduces no further LSEs that may compromise European site integrity.

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			<u>there would be no harm to residential amenity and / or it would prevent the efficient use of land in sustainable location; and</u> a) <u>Limit the loss of privacy</u>, daylight, and sunlight; and b) <u>Mitigate the impacts of:</u> i) Noise, vibration, light, heat, smell and airborne emissions consisting of odour, fumes, smoke, soot, ash, dust and grit; and <u>artificial light, and</u> e)ii) activity levels and <u>Traffic movements to, from generation; and within the site</u> d) security of property and personal safety. <u>Key supporting documents</u> <u>National Model Design Code</u> <u>Building Research Establishment - A Good Practice Guide for site layout planning for daylight and sunlight.</u>	Added key supporting documents added for effectiveness	
MM76	104-105	Policy DM10	<u>Policy DM10 – Building Emissions and Energy Standards</u> <u>Policy DM10: Building Emissions and Energy Standards</u>	Title and policy name change-Amendment necessary to ensure policy is effective	No. The change introduces no further LSEs that may compromise European site integrity.

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			All proposals should embed the Energy Hierarchy within the design of buildings by prioritising fabric first, orientation and landscaping in order to minimise energy demand for heating, lighting and cooling. All proposals should consider opportunities to provide solar PV and energy storage. Residential development will be required to achieve Net Zero Carbon, demonstrated through the submission of an appropriate energy assessment that demonstrates how the proposal will achieve: <u>a)</u> Space heating demand less than 30kWh/m2/annum <u>b)</u> Total energy use less than 40kWh/m2/annum; and <u>c)</u> On-site renewable energy generation to match the total energy use, with a preference for roof mounted solar PV. Where the use of on-site renewables to match total energy consumption is demonstrated to be not technically feasible (for example with taller flatted buildings) or economically viable, renewable energy generation should be maximised as much as possible; and/or connection to an existing or proposed district energy network. All non-residential development must achieve a minimum of BREEAM 'Excellent' UK New Construction standard or equivalent, or any equivalent new standard. This		

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			standard should be achieved through increasing energy efficiency of the proposed buildings, and/or the provision of on-site renewable and low-carbon technologies.		
MM77	106	Policy DM11	7.17. The policy requires that new dwellings, <u>as a minimum</u>, meet the tighter Building Regulations optional water efficiency requirement of 110 litres per person per day <u>or any increased standard that may be introduced in the future</u>, this is a continuation of current previous policy in the borough. <u>Planning conditions maybe used on planning approvals for new dwellings to ensure the optional requirement is applied and that this is calculated using the 'fittings based approach'</u>. <u>Key supporting documents</u> <u>Approved Document G: sanitation, hot water safety and water efficiency</u>	Necessary modifications supporting text to ensure policy is effective Modified to include Key document - consistent with other policies	No. Potential implications of the allocation of a higher number of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the wording change to reflect a minimum (rather than estimated) site number is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM78	107	Policy DM12	<u>Key supporting documents</u> <u>The Surrey Health and Well-Being Strategy</u> <u>Surrey Health Impact Assessment Guidance Statement</u>	Modified to include Key document - consistent with other policies	No. The change introduces no further LSEs that may compromise European site integrity.

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			<u>Joint Strategic Needs Assessment (JSNA) contains a wealth of health data.</u>		
MM79	108	Policy S13	Policy S13 – Preserving identity of place with heritage 7.23. The borough has a rich, varied and evolving history, which contributes significantly to its sense of place and identity. Our relationship with history is characterised in no small part by the built environment, particularly by “heritage assets” (as defined by the national planning policy), which also make an essential contribution to the quality of the borough’s townscape. 7.24. Importantly, these heritage assets provide context for development, and can collectively act as a useful compass to guide decision making. It is therefore vital that tangible and cultural heritage assets and their settings are either protected or enhanced, or where necessary, adapted in a sensitive way. Policy S13: Preserving identity of place with heritage 1) Development will be permitted where as far as possible, it enhances the borough’s cultural, historic, architectural and townscape character. 2) The Council will seek to utilise mechanisms available through national policy and legislation, to protect the character of historic places and the significance of designated heritage assets, and uphold the principles upon which such protection has been justified.	Policy deleted as matters adequately addressed by policy S11	No. Policy deletion introduces no further LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Key supporting documents ♦ National Heritage List for England ♦ Locally Listed Heritage Assets ♦ Conservation Area Appraisals ♦ Historic England Advice Notes ♦ Local Plan Heritage Topic Paper ♦ Appendix 6 – Guidance on Proposals Impacting Heritage Assets.		
MM80	110	Policy DM13	7.35. The level of detail required to demonstrate the impact of a development on any heritage asset shall be at the in line with the NPPF discretion of the Council, taking into consideration National Policy and Guidance and the Council's own planning application validation requirements. For further information see Appendix 65, guidance on proposals impacting Heritage Assets.	Necessary for effectiveness and to ensure the policy is positively prepared	No. The change introduces no further LSEs that may compromise European site integrity.
MM81	111	Policy DM14	Policy DM14: Shopfronts The design of new shopfronts and other commercial signage and the re-design of existing shopfronts and commercial signage should demonstrate: respect for the architecture and features of the buildings in or on which they are set and the character of the area; public safety would not be prejudiced; visual pollution and clutter are avoided; the proposal will provide an 'active street front'.	Deleted reference to future revisions to this document as policy wording not effective	No. The change introduces no further LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Shopfront Design should accord with the Council's guidance for shopfronts: 'Shopfront Design Guide' or any future revisions to this document. The Council will resist the removal of shopfronts of architectural or historic interest. The Council will control the number, design and siting of advertisements and hoardings to ensure the character and amenity of individual buildings and streets are not materially harmed, having regard to the interests of amenity and public safety (including highway safety).		
MM82	112	Policy DM15	Policy DM15 – Green Belt 7.39. Approximately 40% of Epsom and Ewell is Green Belt; land designated under a national policy designed to restrict the urban sprawl from London. The Green Belt serves five purposes:- to check the unrestricted sprawl of large built-up areas;- to prevent neighbouring towns merging into one another;- to assist in safeguarding the countryside from encroachment;- to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <u>Green Belt policy can be found in the National Planning Policy Framework. Policy DM15 is not intended to repeat national policy, but to provide local detail on specific policy matters.</u>	Modified policy and supporting text to provide clarity in relation to extensions and major developed sites in the Green Belt necessary for effectiveness and consistency with national policy, and to ensure that the supporting text does not contain policy requirements	No. The conclusions of the Addendum Report remain valid; changes to the policy wording introduce no new LSEs that may compromise European site integrity.

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			<i>Two new paragraphs inserted after para. 7.39.</i> <u>The Green Belt is very important to Epsom & Ewell as it:</u> <u>positively contributes to the boroughs identity, character and appearance;</u> <u>prevents coalescence with other settlements to the west, east and south;</u> <u>contains public open spaces such as Horton Country Park, Epsom Common and the Epsom Downs, parts of which are protected by national and local environmental designations,</u> <u>provides land for sport, including sports pitches which play a valuable role in health and wellbeing contains the Epsom Downs Racecourse, racehorse training industry and infrastructure,</u> <u>Proposals within the Green Belt will be expected to comply with all other Local Plan policies when taken as a whole, particularly those that cover design, amenity, landscape, biodiversity and flooding.</u> 7.40. National policy defines what is inappropriate and what exceptions to this definition exist, and should be read in conjunction with this policy. It also defines what is not inappropriate development. This policy aligns with the NPPF definitions and exceptions but adds the following detailed definitions to them:- Extensions or alterations		

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			The “original building” shall mean either: the building as it existed on 1 July 1948; or if no building existed on 1 July 1948, then the first building as it was originally built after this date. Replacement buildings A new building will only constitute a “replacement” if it is sited on or in a position that substantially overlaps that of the original building, unless it can be clearly demonstrated that an alternative position would not increase the overall impact on the openness of the Green Belt. <u>In terms of extensions or alterations to an existing dwelling or other building within the Green Belt, this will be considered against the original building, which is the size of the building that existed on 1 July 1948 or the building as first built if later than this date. This is to enable the effect of cumulative development to be taken into account when a building has been extended previously. The cumulative impact of a series of small extensions can be just as great as a single large addition. The size of the plot is not relevant when considering whether a replacement building is materially larger or an extension results in disproportionate additions.</u> Policy DM15: Green Belt Green Belt 4) ——— Development in the Green Belt will be considered inappropriate, and will not be permitted unless:		

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			a) the development itself is an exception to the definition of "inappropriate" as defined by the National Planning Policy Framework; or b) there are very special circumstances to justify the inappropriate development. 2) Very special circumstances are circumstances where other considerations clearly outweigh the harm to the Green Belt as a result of the development. <u>1) The Green Belt boundary is defined on the Policies Map. In order to uphold the fundamental aims of the Green Belt, inappropriate development should not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm is clearly outweighed by other considerations.</u> <u>Replacement and Extension of Buildings in the Green Belt</u> <u>2) The Council will permit the replacement of a building in the Green Belt provided the new building:</u> <u>a) would be in the same use; and</u> <u>b) is not materially larger than the one it replaces; and</u> <u>c) is sited on or close to the position of the existing building, unless an alternative position would benefit the openness of the Green Belt; and</u>		

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			<u>d) does not have a materially greater impact on the openness of the Green Belt.</u> <u>3) The Council will permit the extension and alteration to a building in the Green Belt provided the additional development:</u> <u>a) is not disproportionate, over and above the size of the original building; and</u> <u>b) does not have a materially greater impact on the openness of the Green Belt.</u> <u>Infill or redevelopment of previously developed land in the Green Belt</u> <u>4) The Council will permit limited infilling of previously development land in the Green Belt provided the development:</u> <u>a) does not have a materially greater impact on the openness of the Green Belt; or</u> <u>b) does not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.</u>		
MM83	115	Policy S14	<i>New paragraph after para. 7.49.</i> <u>The Council holds a licence granted by Natural England under the Great Crested Newt District Licencing Scheme. This is to ensure appropriate monitoring and mitigation takes place with regard to the habitats of great crested newts and assessment of impacts from proposed development.</u> 7.50. The council recognises the opportunities to encourage biodiversity that can be provided through the development of sites. These include providing, retaining and enhancing wildlife and <u>river</u> corridors and incorporating opportunities within	Additional text necessary to ensure the policy is effective Clarification the contribution made by blue infrastructure to	No. The change introduces no further LSEs that may compromise European site integrity.

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			construction methods, such as green roofs, and the provision of suitable appropriate native species in landscaping. Policy S14: Biodiversity and Geodiversity 1) Development proposals will be permitted where they do not have an adverse impact on biodiversity, or geodiversity. Where harm or loss cannot be avoided, mitigation will be required such that it can robustly demonstrate that: a) there will be no adverse effect on the integrity of international, national and local designated sites; b) there will be no adverse impact on the conservation status of priority species; c) there will be no loss or deterioration of a priority habitat type, and/or irreplaceable habitat; d) the mitigation measures make a specific and positive contribution towards conservation objectives of Biodiversity Opportunity Areas or area identified as a priority for nature recovery in the emerging Local Nature Recovery Strategy LNRS (if located within such area); and e) there will be no adverse effect on the integrity of linkages between designated sites and priority habitats <u>are maintained or enhanced</u>.	ensure the policy is effective Necessary modification part e to be positively prepared Amendment to clarify the importance of mitigation necessary for the policy to be positively prepared	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			2) The weight attributed to the protection of nature conservation interests will be commensurate to their status and significance, and any other designation applying to the site, habitat or species concerned. For proposals that affect nationally protected sites, it must be robustly demonstrated that the benefits of the development proposal clearly outweigh the loss or harm and that appropriate <u>mitigation and/or</u> compensation will be sought. 3) Effective avoidance, mitigation and compensation will be secured through the imposition of planning conditions or planning obligations as appropriate, including monitoring for the effectiveness of these measures. Key supporting documents • Epsom and Ewell Biodiversity Action Plan (2020-2030) • Emerging Local Nature Recovery Strategy • Water Framework Directive	Additional supporting document for consistency and to ensure policy is positively prepared	
MM84	117-118	Policy S15	Policy S15 DM25 – Biodiversity Net Gain 7.53. This policy will require at least 10% BNG on qualifying development proposals and 20% BNG from <u>seven</u> greenfield site allocations <u>SA33 -SA35 and SA48 -51 where the</u>. This higher requirement is detailed in the site allocation policy.	Modified the policy from strategic policy to development management policy Changes are necessary for clarity and effectiveness and to	No. The change introduces no further LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			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 <u>or on unallocated sites that lie outside the urban area as defined on the policies map</u>) must be approved before development commences on a site. BNG will be provided either on-site, off site or through statutory biodiversity credits in line with the BNG hierarchy. 7.57 Biodiversity net gain will be secured by planning condition, legal agreement or a conservation covenant, for a period of at least 30 years after the completion of the development Policy S15DM25: Biodiversity Net Gain 1) Planning applications, other than those that are exempt in accordance with the regulations, will be permitted provided that <u>the council is satisfied it can be demonstrated</u> that at least 10% biodiversity net gain can <u>be</u> achieved (unless a higher requirement has been specified in a site allocation policy <u>or on unallocated sites that lie outside the urban area as defined on the Policies Map</u>). 2) Biodiversity net gain should be delivered using the following hierarchy <u>(note this does not apply to irreplaceable habitats)</u>: a) On-site as part of the development <u>which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity</u>	remove unnecessary duplication. Modified for effectiveness the site allocations outside the urban area require 20% BNG Remove supporting text as not justified Necessary for clarity and effectiveness Modified text to accord with national policy Criteria b and c modified for clarity	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>metric), the avoidance of adverse effects from development and, if they cannot be avoided, the mitigation of those effects; and</u> 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 <u>then, in relation to all onsite habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits;</u> c) As a last resort, if it can be demonstrated that neither of these options are either available or economically feasible, net gain should be secured on land within the borough boundary. BNG offsets should align with and deliver the LNRS and preferably within BOAs. 3) Biodiversity net gain will be secured by planning condition, legal agreement or a conservation covenant, as appropriate. Key supporting documents Surrey Nature Partnership, Recommendation for adoption of 20% minimum BNG <u>biodiversity net gain across Surrey's planning sector: a Surrey Nature Partnership Position Statement</u> (2020) Statutory biodiversity M<u>metric tools and guides:</u> https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides	Supporting documents added/removed for consistency and to ensure policy is positively prepared	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Small sites metric: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides Guidance – Buy Statutory biodiversity credits https://www.gov.uk/guidance/buy-statutory-biodiversity-credits Planning Practice Guidance Biodiversity Net Gain		
MM85	119-120	DM17	Policy DM17: Trees, Woodlands and Hedgerows Development proposals will be permitted where: a) they do not result in the loss of, or damage to, trees, woodlands and hedgerows that make a significant contribution to the character or amenities of an area, unless the benefits would clearly outweigh the loss and equivalent replacement planting is provided. b) they do not result in the loss of or damage to ancient woodland, ancient or veteran trees or trees protected by Tree Preservation Order (TPO) unless there are <u>exceptional reasons circumstances and a suitable compensation strategy appropriate planting</u> to mitigate the loss in biodiversity and natural asset is proposed <u>and maintained</u>. Where <u>development is proposed adjacent to ancient woodland, suitable buffer zones of a minimum 15m must be provided (in line with Natural England's Standing Advice)</u>. c) they make provision for <u>new streets to be tree lined and new street trees</u> and trees within public open space (subject to site suitability) with sufficient space provided for the trees to grow to maturity, both above and below ground.	Modified for clarity and effectiveness to signpost to relevant technical standards Additional text about buffer zones to ensure consistency with national policy Modified part b to include 'and maintained' to increase emphasis on preservation and maintenance Modification to reflect national policy and Standing Advice from Natural England	No. The change introduces no further LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
				regarding buffers to ensure root protection	
MM86	121-123	Policy S16	7.66. Whilst the thresholds for flood zones and how different types of development should be approached are defined at a national level, the council has discretion as to the interpretation of "flood zone 3b". It has taken a precautionary approach and set a high bar by defining flood zone 3b as areas with a 1 in 3020 year fluvial flood risk or <u>greater</u> (>3.35 % 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) <u>as identifies</u> "Critical Drainage Areas" (CDAs). These are not the same as the national designations of the same name defined by the Environment Agency, and should not be conflated. 7.68. In recognition of the heightened challenge faced by flooding, the Council has also heeded EA advice that development should be located 8m away from river banks. However, requirements under Biodiversity Net Gain Requirements may necessitate further set-backs and should be considered in parallel to this policy requirement. 7.70. The Level 2 assessment also provides further bespoke guidance for each allocated site as to whether further a site specific Flood Risk Assessment (FRA) will be required on application as well information about the FRA should be conducted.	Necessary modification to correct the number of years from 20 to 30 year fluvial flood risk for effectiveness Necessary to ensure consistency with national policy	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			<i>Insert new paragraph after paragraph 7.70</i> <u>Sustainable drainage systems (SuDS) manage surface water in a way that mimics natural processes, providing a wide range of benefits beyond traditional drainage methods. SuDS should be incorporated into development in accordance with the National Standards for Sustainable Drainage Systems.</u> 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 <u>in line with national policy and guidance.</u> c) In the case of proposals in flood zone 2, 3a, 3b, sites greater than 1ha in flood zone 1, with an otherwise identified flood risk, or areas susceptible to Surface Water Flooding (as identified in the SFRA maps), Planning application(s) have been accompanied by a Flood Risk Assessment <u>in line with national policy and guidance.</u>	Necessary modification on SuDs to align with national policy Necessary modifications to align with national policy	

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			d) It is set back a minimum of 8 metres from riverbanks and/or existing flood defence infrastructure (measured from the top of the riverbank at the point at which the bank meets the level of surrounding land). e) Finished floor levels are set 300mm above the climate change flood level (as defined in the SFRA). f) It would not increase the risk of flooding to the site or elsewhere its neighbours or in. Mitigation measures to alleviate <u>address</u> (such as Sustainable Drainage Systems, Nature Based solutions or Natural Flood Management) will be implemented. such risks <u>should be in line with guidance from both the Lead Local Flood Authority and Environment Agency depending on the source of flood risk.</u> 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. <u>j) Sustainable drainage systems are installed which follow the drainage hierarchy of:</u>		

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>i. storing rainwater for later re-use;</u> <u>ii. use infiltration techniques;</u> <u>iii. attenuate rainwater in ponds or open water features for later gradual release;</u> <u>iv. discharge rainwater directly to a watercourse;</u> <u>v. discharge rainwater to a land drain, highway drain or surface water sewer;</u> <u>vi. discharge rainwater to a combined sewer.</u> <u>Development should avoid the use of underground tanks and conveyance, except when all other reasonable alternatives to provide a sustainable drainage solution have been exhausted, any discharge of surface water to a watercourse or sewer system is not to exceed pre-development (greenfield) runoff rates or a maximum of 2l/s/ha whichever is lower</u> Key supporting documents Strategic Flood Risk Assessment – Level 1 2024 Surface Water Management Plan 2011 Epsom and Ewell Climate Change Action Plan 2020. Flood Risk Regulations 2009 Flood Water Management Act 2010 National and Coastal Erosion Risk Management Strategy 2020 EA FCERM Roadmap to 2026 UK Environment Act 2021 UK Climate Change Adaptation Policy 2021 UK Climate Risk Assessment 2022 Surrey County Council Preliminary Flood Risk Assessment 2011		

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Surrey Local Flood Risk Management Strategy 2017 Planning Practice Guidance – Flood Risk and Coastal Change 2022 <u>National standards for sustainable drainage systems (SuDS) 2025</u> National Planning Policy Framework Thames Catchment Flood Management Plan 2009 Thames River Basin District Flood Risk Management Plan 2022 Surrey County Council Sustainable Drainage System Design Guidance		
MM87	126-127	Policy S17	8.4. New or improved infrastructure must be delivered and/or upgraded in a timely manner to meet the needs of new development. Developers, particularly of larger schemes, are encouraged to engage with the council and infrastructure providers at an early stage in the planning process to ensure this can be achieved. For new development, the provision of or funding towards new infrastructure will be secured through planning obligations (S106) and/or the Community Infrastructure Levy (CIL). <u>Phasing conditions could be used where necessary to align the occupation of development with delivery of off-site infrastructure upgrades.</u> 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. <u>The loss of open space, social infrastructure and other community facilities as defined in the glossary, are considered under policies DM19 and DM20. Developers must provide evidence to this effect that consultation with an appropriate range of service providers and the community has taken place.</u> 8.7. The delivery of infrastructure will be funded through a combination of mechanisms, which will include the use of Community Infrastructure Levy (CIL) funds. The council annually publishes an Infrastructure Funding Statement that sets	Modified for clarity and effectiveness to be clear that the policy applies to certain development and that funding needs to be secured and therefore should be set out. Delete wording regarding funding which needs to be within the policy itself to be effective Modified to clarify that infrastructure provision could be phased for large development and	No. The change does not introduce any new LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			out the CIL and S106 funds that have been received and how such funds have been spent and are likely to be spent in future years. Policy S17: Infrastructure Delivery <u>Development proposals, including those allocated within this plan which give rise to a need for infrastructure requirements, will be expected to mitigate their impact, whether individually or cumulatively. Where additional infrastructure capacity is required, this will be either All new development must contribute towards the provision (and where appropriate, maintenance) of infrastructure and services. This includes provision to mitigate against any substantial cumulative effects on existing infrastructure services. The infrastructure necessary to support new development should either be provided on-site as an integral part of the development or be secured through off-site contributions. Such provision will be secured by legal agreements or via the Community Infrastructure Levy, through financial contributions via the infrastructure levy.</u> - Infrastructure must be provided at the appropriate time, prior to the development becoming occupied or becoming operational. <u>For larger developments, infrastructure may need to be phased and appropriate delivery of infrastructure should be agreed on a site by site basis. to ensure that this requirement can be met.</u> - Development of new infrastructure, in particular infrastructure projects identified in the Infrastructure Delivery Plan, that meet needs of the borough and its communities will be permitted, subject to the consideration of other policies within this Local Plan.	aligned with infrastructure upgrades to ensure the policy is justified. Additional clarification in relation to loss of specific infrastructure Delete last sentence from 8.5 for clarity to ensure an effective policy Changes are necessary for clarity and effectiveness and to remove unnecessary duplication. Text modified to clarify that the policy applies to certain types of development and that funding needs to be secured and what	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			4) Losses of existing infrastructure will only be permitted where it can be clearly demonstrated there is no longer a need for such infrastructure, or a suitable alternative is provided.	mechanisms will be used to secure it Additional clarification in relation to loss of specific infrastructure	
MM88	128	Policy S18	8.8. Green and blue infrastructure includes individual natural components that are connected into network fulfilling multi-functional roles with multiple benefits to the local community, economy and environment. Green features may include (but are not limited to) open space, parks, public and private gardens, woodlands, playing fields, allotments, trees, green roofs/walls and blue features may include rivers, streams, <u>footpaths and shared surfaces</u>, 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. <i>2 new paragraphs in-between para. 8.9 & 8.10:</i> <u>All development should contribute towards the provision, improvement, and maintenance of the green infrastructure network across the Borough where appropriate to do so. Whilst the Council will only expect 'major' development proposals to be designed in accordance with established, recognised green infrastructure standards, all developments can make a positive impact on the green</u>	Text modified to clarify that future management arrangements should be secured to ensure the policy is effective	No. The change introduces no further LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>infrastructure network and proposals will, be expected to make such provision at a scale that is commensurate with the development.</u> <u>Expanding and enhancing the green and blue infrastructure network will provide multiple benefits to the Borough as a whole, however, preserving its quality and condition for the long term requires effective management arrangements to be in place from the outset to ensure a successful and sustainable outcome is achieved. The most appropriate management option for a development will vary depending on the scale, location and green and blue infrastructure provided and must be agreed on a case-by-case basis.</u> Policy S18: Green and Blue Infrastructure 4. 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 <u>protects and enhances the green and blue infrastructure network</u>, through provision of appropriate green or blue infrastructure features within the network; <u>Major developments must demonstrate that provision is in accordance with established, recognisable standards, including the National Model Design Code and the Natural England Green Infrastructure Framework.</u>	Modified for effectiveness with additional text to clarify and emphasise the connectivity to the wider network beyond the site Modification to c) to make clear that loss should be replaced	

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			c) any <u>loss or</u> adverse impacts on the green <u>and blue</u> infrastructure network are fully mitigated through the <u>replacement</u> / provision of green infrastructure <u>of equivalent or better value</u> 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 <u>Key Supporting Documents</u> <u>National Model Design Code</u> <u>Natural England Green Infrastructure Framework</u> Surrey County Council Green and blue Infrastructure: best practice case studies <u>Natural England Green Infrastructure Framework</u>	Modified for effectiveness for relevant supporting documents added including Natural England's GI Framework Relevant supporting documents added for consistency and to ensure the policy is positively prepared	
MM89	129-131	Policy DM19	Policy DM19 – Open Spaces, <u>Outdoor</u> Sport and Recreation	Modified to clarify that the policy applies to	No. The change does not introduce any new LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			8.11. This policy covers formal and informal open spaces, outdoor and indoor sports land/facilities and ancillary buildings/recreational facilities, allotments and equipped areas of play. 8.12. Open spaces often have a multi-functional role, providing a range of leisure and recreational opportunities, making a valuable contribution to health and wellbeing, being havens for biodiversity, and helping to alleviate and mitigate against the impacts of climate change. Open spaces also play a key role in flood risk management and are key elements to developing successful SUDS. 8.13. The council's evidence base studies have found that generally there is a good range of accessible public open spaces, sports facilities and playing pitches within the borough. These are greatly valued by residents and attract many users from beyond the borough's boundaries. The studies have also found that there is a need for new/improved public open space provision in certain areas of the borough and there is demand for additional sporting facilities. 8.14. The purpose of this policy is to ensure that the range and quality of open spaces, outdoor sport and recreation provision is maintained and improved where needs are identified, to ensure it meets the needs of the communities they serve. <u>Opportunities to achieve wider community use of facilities for outdoor sport and recreation, for example on educational sites, will be sought through the utilisation of measures such as Community Use Agreements (CUA).</u> 8.15. Existing open spaces, sport and recreational buildings and land, including playing fields, will be safeguarded in accordance with national policy. The general expectation <u>is that such land should not be built on unless it is clearly shown to be</u>	outdoor sports and moved reference to indoor facilities to DM20 to ensure consistency with national policy Other modifications for clarity and effectiveness	

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			<u>surplus to requirements, or proposals will provide an equivalent or better provision in a suitable location, or the proposal is for alternative sports and recreational provision the benefits of which clearly outweigh the loss of the former use. will be that proposals affecting this type of existing infrastructure will include provision for equivalent or better quality provision.</u> 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. <u>Where appropriate, A</u>ll new development is expected to contribute towards the provision/<u>maintenance</u> (and where appropriate, maintenance) of infrastructure, which includes open spaces, sports and recreational facilities. Policy DM19: Open Spaces, <u>Outdoor</u> 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 <u>outdoor sports/facilities</u> indoor and ancillary buildings built sport and recreational facilities must be of high quality, and optimise accessibility to all users <u>and where appropriate, maximise wider community benefit through the utilisation of measures such as community use agreements.</u> 3) All development which would result in a net increase in residential units will be required to contribute towards open space, sport and recreation provision. This will either be through financial contributions via the community infrastructure levy, or on-site provision. Where a development is required to make on-site provision, this must	Modified to clarify that the policy applies to outdoor sports For conciseness, substituted open space with provision in criteria 3, removed reference to audit in criteria 3 in order to future proof the	

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			be an integral part of the development and have in place appropriate long term stewardship arrangements to secure the quality of the open space <u>this provision</u> in perpetuity. 4) <u>Provision standards should be</u> 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 <u>outdoor</u> 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. <u>Key Supporting Documents</u> Open Space Audit (2024) Playing Pitch Strategy (2021)	policy. Changes made to ensure the policy is consistent with national policy and effective Title for supporting documents amended and additional document added for consistency	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Sports Facilities Assessment (2020) <u>Epsom and Ewell Infrastructure Delivery Plan</u>		
MM90	132-133	Policy DM20	Policy DM20 – <u>Social Infrastructure and Community and Cultural Facilities</u> 8.20. Social infrastructure and community and cultural facilities play a vital role in supporting social well-being in the borough and it is therefore important that there are sufficient facilities to meet the needs of communities both now and in the future. Social infrastructure and community facilities include uses such as healthcare facilities, education facilities, childcare facilities, leisure centres/sports halls, community centres/halls, libraries, public houses, the voluntary sector, public service providers, places of worship and cultural buildings such as theatres and arts centres. Community and cultural facilities include uses such as community halls, theatres, places of worship, cultural buildings, schools, education facilities, GPs or health centres, dentists, libraries, civic centres, open space, sports venue indoor and outdoor sports facilities, and public houses. <i>New paragraph in-between para. 8.21 and 8.22</i> <u>It is important to maximise the use of existing facilities given the limited land availability for new facilities. Proposals to enhance, upgrade and intensify the use of existing facilities will be supported, subject to the consideration of other policies within in this plan. The council will support proposals for facilities or “hubs” that accommodate a mix of community uses to enable the most efficient use spaces/facilities</u>	Modified title for clarity and effectiveness Modified first paragraph to define what uses would be included under Social Infrastructure and Community facilities- this has also been reflected in the glossary Incorporated former parts of DM19- Indoor sports/leisure facilities into this policy Modified text for effectiveness to promote reuse and maximising use of existing facilities.	No. The change does not introduce any new LSEs that may compromise European site integrity.

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			8.22. New provision should be located in sustainable locations, ensuring good accessibility by a wide range of travel modes. <u>Buildings and facilities should be flexible and adaptable. Where appropriate Community Use Agreements (CUA) will be sought to achieve wider community use of facilities.</u> 8.23. The council will require any loss to be fully justified, with marketing undertaken in accordance with the requirements of Appendix 5- <u>unless the loss can be re-provided to an equivalent standard elsewhere within the borough or provision can be delivered in a different way, such as through estate rationalisation to deliver improved/modernised facilities.</u> Policy DM20: <u>Social Infrastructure and Community and Cultural Facilities</u> 1) Planning permission will be permitted for new or extensions/<u>enhancements</u> 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/<u>community</u> uses where practicable, to encourage efficient use of land through mixed use and increased public access-; <u>and</u>	Additional text to promote community use agreements for wider community use to ensure policy is effective in this regard Modified text for clarity and effectiveness Social Infrastructure and Community facilities have been defined in the glossary Additional text to promote community use agreements for wider community use Added Sports Facilities Assessment under key supporting documents	

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

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			8.25. For its size, the borough contains a wide range of education infrastructure ranging from early years providers, primary and secondary schools in both the public and private sectors to further and higher education facilities. 8.26. It is home to three further and higher education campuses, notably the University for the Creative Arts, North East Surrey College of Technology (NESCOT) and Laine Theatre Arts, in addition to 6th form facilities at schools that play a valuable role in supporting the social fabric and economic success of the borough and its residents. 8.27. Education establishments often provide a range of educational, recreational and sporting facilities which can be used to meet a variety of needs not only for pupils, but for local communities. 8.28. The council will support investment in the existing educational infrastructure to ensure facilities continue to support changing needs and demands. 8.29. The Council also wishes to encourage such facilities to be available for use by the wider community wherever possible, to improve access to sporting activities and other community based activities. For example, our evidence has shown that there is a need for additional playing pitches and sports halls which could partly be met by utilising existing or new educational infrastructure. Policy DM21: Education Infrastructure	DM20, remove to avoid duplication.	compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?	
			1) Development proposals for the intensification and enhancement of established education facilities in the borough will be supported. 2) Proposals which maximise the extended or multiple use of educational facilities for community or recreational use will be supported. Key supporting documents – → Epsom and Ewell Infrastructure Delivery Plan					
MM92	136	Policy DM22	8.38. Aerodrome safeguarding is a legal requirement to ensure the safe operation of aerodromes, such as Heathrow, and, Gatwick Airport <u>and Kenley Aerodrome</u>, is taken into account in the design of development. Aerodrome safeguarding considerations cover a number of aspects including tall structures, wind turbines and green infrastructure. 8.40. The aerodrome safeguarding area extends to cover a zone broadly within 5530km of the airports, covering much of the borough. The borough is also within the 30km wind turbine notification area. More information is available on the airports website, and applicants are encouraged to consult the technical aerodrome safeguarding advice notes or liaise directly with the airport operator for advice on proposed developments.			Modification to the supporting text to include Kenley Aerodrome recommended by Defence Infrastructure Organisation Amended safeguarding zone from 30km to 55km as recommended by Gatwick Airport	No. The change introduces no further LSEs that may compromise European site integrity.	
MM93	139	Policy S1	Indicators	Annual Target / Plan Period Target	Data source		Modified to reflect increased housing supply and trajectory.	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no
			Net additional dwelling completions	Annual target – average of at least	Planning decisions and appeals			

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
				TBC dpa in line with current trajectory. <u>152 dwellings per annum from years 1 to 4 (2022/23 – 2025/206) and 386 dwellings per annum for years 5 to 18 (2026/27 – 2039/40)</u> Plan target – delivery of at least 4,700 <u>6,012</u> dwellings over the plan period (2022-2040)	Monitoring data	Necessary for effectiveness	adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
			Annual Net delivery of Gypsy pitches permitted and completed	at least <u>at least</u> 180 pitches over the Local Plan period (as per need identified in the GTAA)	Planning decisions and appeals <u>that deliver additional gypsy and traveller pitches</u> Monitoring data		
			The amount of net employment floorspace permitted and completed each year	<u>Plan target - at least 41,464 sqm of additional employment floorspace</u>	Planning decisions and appeals <u>that result in a loss or gain in employment floorspace</u>		

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?									
				Assess trends against identified needs in the HEDNA	Monitoring data <u>CoStar platform or similar real estate information company at local plan review stage</u>												
			The amount of net Change in retail floorspace permitted and completed each year	<u>No specific target</u> Assess trends against identified needs in the retail study	Planning decisions and appeals <u>that result in a net loss of retail floorspace</u> Monitoring data												
MM94	139	Policy S2	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Number of planning applications refused</td><td>n/a</td><td>Planning applications and appeals</td></tr><tr><td>Number of planning applications permitted that do not fully comply with</td><td><u>No specific targets</u> n/a</td><td>Planning applications and appeals</td></tr></table>				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	<u>No specific targets</u> n/a	Planning applications and appeals	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and
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	<u>No specific targets</u> n/a	Planning applications and appeals															

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
			policy requirements following a viability review.					no further LSEs that may compromise European site integrity are foreseen.						
MM95	140	Policy S3	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Number of residential schemes that comply that do not comply with the policy requirements <u>Strategic Policy that will be monitored through indicators of more detailed DM policies</u></td><td>No specific targets n/a</td><td>Planning decisions and appeals <u>Authority Monitoring Report</u></td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	Number of residential schemes that comply that do not comply with the policy requirements <u>Strategic Policy that will be monitored through indicators of more detailed DM policies</u>	No specific targets n/a	Planning decisions and appeals <u>Authority Monitoring Report</u>	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
Indicators	Annual Target / Plan Period Target	Data source												
Number of residential schemes that comply that do not comply with the policy requirements <u>Strategic Policy that will be monitored through indicators of more detailed DM policies</u>	No specific targets n/a	Planning decisions and appeals <u>Authority Monitoring Report</u>												
MM96	140	Policy S4	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Regeneration of 13 strategic allocations in the town centre</td><td>Delivery of sites over Local Plan period in accordance with the trajectory.</td><td>Planning decisions and appeals Monitoring data</td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	Regeneration of 13 strategic allocations in the town centre	Delivery of sites over Local Plan period in accordance with the trajectory.	Planning decisions and appeals Monitoring data	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development
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												

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
			<u>Change in floorspace for town centre uses over the plan period</u>	<u>Plan period- an increase in floorspace for town centre uses.</u>	<u>Planning decisions and appeals</u> <u>Monitoring data</u>			proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.						
			<u>Implementation of proposals set out within the Local Cycling and Walking infrastructure Plan</u>	<u>Priority schemes delivered over the Local Plan period.</u>	<u>Infrastructure Delivery Plan</u>									
MM97	140	Site Allocation- SA1 to SA35	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Delivery of sites</td><td>To deliver sites over the Local Plan period in accordance with the trajectory.</td><td>Planning appeals and decisions Monitoring data</td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	Delivery of sites	To deliver sites over the Local Plan period in accordance with the trajectory.	Planning appeals and decisions Monitoring data	Delete Text not justified	No. Text deletion introduces no further LSEs that may compromise European site integrity.
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												
MM98		SA1 Southern Gas Network Site	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 455 dwellings and a bespoke performing</u></td><td><u>Delivery of development by 2030 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u></td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 455 dwellings and a bespoke performing</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were
Indicators	Annual Target / Plan Period Target	Data source												
<u>Delivery of at least 455 dwellings and a bespoke performing</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u>												

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?								
			<table><tr><td><u>arts centre for the Laine Theatre Arts</u></td><td></td><td><u>Monitoring data</u></td></tr><tr><td></td><td></td><td></td></tr></table>			<u>arts centre for the Laine Theatre Arts</u>		<u>Monitoring data</u>							anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
<u>arts centre for the Laine Theatre Arts</u>		<u>Monitoring data</u>													
MM99		SA2 Hook Road Car Park	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 145 dwellings</u></td><td><u>Delivery of development by 2030 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 145 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.		
Indicators	Annual Target / Plan Period Target	Data source													
<u>Delivery of at least 145 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>													

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
MM100		SA3 Solis House, 20 Hook Road	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of at least 20 dwellings</u></td><td><u>Delivery of development by 2030 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 20 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 20 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									
MM101		SA4 Bunzl, Hook Road	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of at least 35 dwellings</u></td><td><u>Delivery of development by 2027 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 35 dwellings</u>	<u>Delivery of development by 2027 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 35 dwellings</u>	<u>Delivery of development by 2027 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
							with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.						
MM102		SA5 Epsom Town Hall	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 90 dwellings</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 90 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 90 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM103		SA6 Hope Lodge Car Park	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td></td><td></td><td></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source				Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the
Indicators	Annual Target / Plan Period Target	Data source											

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM104		SA7 Former Police and Ambulance Station Site	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
			<u>Delivery of at least 85 residential, nursing and dementia care bedrooms for the elderly</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
							site integrity are foreseen.						
MM105		SA8 Epsom Clinic	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 30 dwellings</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM106		SA9 Depot Road and Upper High Street Car Park	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 100 dwellings and public car parking</u></td><td><u>Delivery of development by 2032</u></td><td><u>Planning appeals and decisions</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 100 dwellings and public car parking</u>	<u>Delivery of development by 2032</u>	<u>Planning appeals and decisions</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 100 dwellings and public car parking</u>	<u>Delivery of development by 2032</u>	<u>Planning appeals and decisions</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
				<u>in accordance with the trajectory</u>	<u>Monitoring data</u>		sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.						
MM107		SA10 79-85 East Street	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 34 dwellings</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 34 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 34 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
MM108		SA11 Finachem House	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of purpose built student accommodation to provide at least 90 student bedrooms or a scheme of at least 35 dwellings.</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of purpose built student accommodation to provide at least 90 student bedrooms or a scheme of at least 35 dwellings.</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of purpose built student accommodation to provide at least 90 student bedrooms or a scheme of at least 35 dwellings.</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									
MM109		SA12 Global House	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of at least 75 dwellings</u></td><td><u>Delivery of development by 2030 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 75 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 75 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?									
							proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.									
MM110		SA13 Swail House	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Refurbishment of Swail house to provide at least 45 dwellings</u></td><td><u>Delivery of development by 2028 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u></td></tr><tr><td><u>The construction of at least 45 specialist accommodation dwellings for the Royal National Institute of Blind People (RNIB)</u></td><td></td><td><u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Refurbishment of Swail house to provide at least 45 dwellings</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u>	<u>The construction of at least 45 specialist accommodation dwellings for the Royal National Institute of Blind People (RNIB)</u>		<u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source														
<u>Refurbishment of Swail house to provide at least 45 dwellings</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u>														
<u>The construction of at least 45 specialist accommodation dwellings for the Royal National Institute of Blind People (RNIB)</u>		<u>Monitoring data</u>														
MM111		SA14 60 East Street	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td></td><td></td><td></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source				Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the			
Indicators	Annual Target / Plan Period Target	Data source														

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2027 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM112		SA15 Corner of Kiln Lane and East Street (101b East Street)	Indicators <u>Delivery of at least 5 dwellings</u>	Annual Target / Plan Period Target <u>Delivery of development by 2029 in accordance with the trajectory</u>	Data source <u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
					site integrity are foreseen.						
MM113		SA16 Land at Kiln Lane	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 40 dwellings</u></td><td><u>Delivery of development by 2035 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 40 dwellings</u>	<u>Delivery of development by 2035 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 40 dwellings</u>	<u>Delivery of development by 2035 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									
MM114		SA17 Hatch Furlong Nursery	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the			
Indicators	Annual Target / Plan Period Target	Data source									

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2031 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM115		SA18 Land to the rear of Rowe Hall	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
			<u>Delivery of an extra care accommodation to provide at least 96 self contained apartments, staff and communal facilities</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
							site integrity are foreseen.						
MM116		SA19 7 Station Approach	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 8 dwellings</u></td><td><u>Delivery of development by 2028 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 8 dwellings</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 8 dwellings</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM117		SA20 Esso Express, 26 Reigate Road	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the			
Indicators	Annual Target / Plan Period Target	Data source											

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
			<table><tr><td><u>Delivery of at least 10 dwellings</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			<u>Delivery of at least 10 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.			
<u>Delivery of at least 10 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM118		SA21 Richards Fields Car Park	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 7 dwellings</u></td><td><u>Delivery of development by 2030 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 7 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 7 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
					site integrity are foreseen.						
MM119		SA22 Etwell House, Station Road	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 20 dwellings</u></td><td><u>Delivery of development by 2028 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 20 dwellings</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 20 dwellings</u>	<u>Delivery of development by 2028 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									
MM120		SA24 Garages at Somerset Close and	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the			
Indicators	Annual Target / Plan Period Target	Data source									

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
		Westmorland Close	<u>Delivery of at least 7 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM121		SA25 64 South Street	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
			<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2030 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
					site integrity are foreseen.						
MM122		SA26 35 Alexandra Road	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 8 dwellings</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 8 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 8 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									
MM123		SA27 22-24 Dorking Road	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the			
Indicators	Annual Target / Plan Period Target	Data source									

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
			<u>Delivery of at least 18 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.						
MM124		SA28 63 Dorking Road	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 6 dwellings</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?												
					site integrity are foreseen.												
MM125		SA30 Epsom General Hospital	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of at least 305 units if older people's accommodation</u></td><td><u>Delivery of development by 2029</u></td><td><u>Planning appeals and decisions</u></td></tr><tr><td><u>Delivery of at least 24 key worker dwellings</u></td><td></td><td><u>Monitoring data</u></td></tr><tr><td></td><td></td><td></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 305 units if older people's accommodation</u>	<u>Delivery of development by 2029</u>	<u>Planning appeals and decisions</u>	<u>Delivery of at least 24 key worker dwellings</u>		<u>Monitoring data</u>				Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source															
<u>Delivery of at least 305 units if older people's accommodation</u>	<u>Delivery of development by 2029</u>	<u>Planning appeals and decisions</u>															
<u>Delivery of at least 24 key worker dwellings</u>		<u>Monitoring data</u>															
MM126		SA31 Land at West Park Hospital (South)	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td></td><td></td><td></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source				Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the						
Indicators	Annual Target / Plan Period Target	Data source															

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
			<u>Delivery of at least 50 dwellings</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.						
MM127		SA32 Land at West Park Hospital (North)	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 180 dwellings</u></td><td><u>Delivery of development by 2032 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 180 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 180 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
							site integrity are foreseen.						
MM128		SA33 Land at Land at Chantilly Way	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 30 dwellings</u></td><td><u>Delivery of development by 2031 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2031 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 30 dwellings</u>	<u>Delivery of development by 2031 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM129		SA34 Hook Road Arena	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 100 dwellings</u></td><td><u>Delivery of development by 2033</u></td><td><u>Planning appeals and decisions</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 100 dwellings</u>	<u>Delivery of development by 2033</u>	<u>Planning appeals and decisions</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 100 dwellings</u>	<u>Delivery of development by 2033</u>	<u>Planning appeals and decisions</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
				<u>in accordance with the trajectory</u>	<u>Monitoring data</u>			sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.						
			<u>Delivery of a new sports hub to include playing pitches, a new pavilion and changing facilities</u>	<u>Delivery of development by 2033</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u>									
MM130		SA35 Land at Horton Farm	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of at least 1,250 dwellings including some specialist accommodation</u></td><td><u>Delivery of development by 2040 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u></td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 1,250 dwellings including some specialist accommodation</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
Indicators	Annual Target / Plan Period Target	Data source												
<u>Delivery of at least 1,250 dwellings including some specialist accommodation</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u>												

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?			
			<u>Delivery of at least 10 gypsy and traveller pitches</u>	<u>Delivery by 2035</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		site integrity are foreseen.			
			<u>Delivery of community building</u>	<u>Delivery by 2035</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u>					
			<u>Delivery of a public park of approximately 7ha</u>	<u>Delivery by 2035</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u> <u>Infrastructure Delivery Plan</u>					
MM131		SA36 25 Alexandra Road Epsom	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the
Indicators	Annual Target / Plan Period Target	Data source								

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Delivery of at least 11 dwellings</u>	<u>Delivery of development by 2036 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM132		SA37 Gainsborough Road Estate	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
			<u>Delivery of at least 8 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
							site integrity are foreseen.						
MM133		SA38 Parking at 54 Gainsborough Road	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 6 dwellings</u></td><td><u>Delivery of development by 2031 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2031 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2031 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM134		SA39 85b Hook Road Epsom	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 6 dwellings</u></td><td><u>Delivery of development by 2037</u></td><td><u>Planning appeals and decisions</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2037</u>	<u>Planning appeals and decisions</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2037</u>	<u>Planning appeals and decisions</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
				<u>in accordance with the trajectory</u>	<u>Monitoring data</u>		sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.						
MM135		SA40 Land west of Ewell By-Pass	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 38 dwellings</u></td><td><u>Delivery of development by 2040 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 38 dwellings</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 38 dwellings</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
MM136		SA41 Conservative Club, Epsom Club and Church	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 28 dwellings</u></td><td><u>Delivery of development by 2038 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 28 dwellings</u>	<u>Delivery of development by 2038 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 28 dwellings</u>	<u>Delivery of development by 2038 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									
MM137		SA42 TK Maxx	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 17 dwellings</u></td><td><u>Delivery of development by 2039 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 17 dwellings</u>	<u>Delivery of development by 2039 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 17 dwellings</u>	<u>Delivery of development by 2039 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
					with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.						
MM138		SA43 Land R/O The Albion Public House (Mccaffertys Bar)	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of at least 11 dwellings</u></td><td><u>Delivery of development by 2037 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 11 dwellings</u>	<u>Delivery of development by 2037 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 11 dwellings</u>	<u>Delivery of development by 2037 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									
MM139		SA44 Spread Eagle	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td></td><td></td><td></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source				Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no
Indicators	Annual Target / Plan Period Target	Data source									

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>Delivery of at least 22 dwellings</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM140		SA45 Auction House	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
			<u>Delivery of at least 10 dwellings</u>	<u>Delivery of development by 2040 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
							site integrity are foreseen.						
MM141		SA46 Laine Theatre Arts	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 6 dwellings</u></td><td><u>Delivery of development by 2033 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2033 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 6 dwellings</u>	<u>Delivery of development by 2033 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											
MM142		SA47 Eclipse Business Park, West Hill	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 23 dwellings</u></td><td><u>Delivery of development by 2036</u></td><td><u>Planning appeals and decisions</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 23 dwellings</u>	<u>Delivery of development by 2036</u>	<u>Planning appeals and decisions</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of at least 23 dwellings</u>	<u>Delivery of development by 2036</u>	<u>Planning appeals and decisions</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
				<u>in accordance with the trajectory</u>	<u>Monitoring data</u>		sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.						
MM143		SA48 Cuddington Glade	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of a 70 bed Care Home</u></td><td><u>Delivery of development by 2029 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of a 70 bed Care Home</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Delivery of a 70 bed Care Home</u>	<u>Delivery of development by 2029 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
MM144		SA49 Land off Cuddington Glade	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 50 dwellings</u></td><td><u>Delivery of development by 2032 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 50 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 50 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									
MM145		SA50 Land at Priest Hill	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Delivery of at least 275 dwellings</u></td><td><u>Delivery of development by 2032 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 275 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping
Indicators	Annual Target / Plan Period Target	Data source									
<u>Delivery of at least 275 dwellings</u>	<u>Delivery of development by 2032 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>									

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?									
					with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.									
MM146		SA51 Downs Farm	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of at least 530 dwellings</u></td><td><u>Delivery of development by 2035 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr><tr><td><u>Delivery of a new specialist school of up to 2.5ha</u></td><td><u>Delivery of development by 2035 in accordance with the trajectory</u></td><td><u>Planning appeals and decisions</u> <u>Monitoring data</u></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of at least 530 dwellings</u>	<u>Delivery of development by 2035 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	<u>Delivery of a new specialist school of up to 2.5ha</u>	<u>Delivery of development by 2035 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
Indicators	Annual Target / Plan Period Target	Data source												
<u>Delivery of at least 530 dwellings</u>	<u>Delivery of development by 2035 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>												
<u>Delivery of a new specialist school of up to 2.5ha</u>	<u>Delivery of development by 2035 in accordance with the trajectory</u>	<u>Planning appeals and decisions</u> <u>Monitoring data</u>												
MM147	140	Policy S5 Housing Mix and Type	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td></td><td></td><td></td></tr></table>	Indicators	Annual Target / Plan Period Target	Data source				Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no			
Indicators	Annual Target / Plan Period Target	Data source												

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?			
			Annual Cumulative 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%	<u>Planning appeals and decisions</u> <u>Monitoring data</u>		adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.			
			Annual Cumulative housing mix delivery (and cumulatively over the plan period) affordable home ownership	Approximate proportions: 1 bed – 20% 2 bed – 40% 3 bed – 30% 4 bed – 10%	<u>Planning appeals and decisions</u> <u>Monitoring data</u>					
			Annual Cumulative housing mix delivery (and cumulatively over the plan period) affordable housing (rented)	Approximate proportions: 1 bed – 10% 2 bed – 35% 3 bed – 35% 4 bed – 20%	<u>Planning appeals and decisions</u> <u>Monitoring data</u>					
MM148	141	Policy S6 Affordable housing	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the
Indicators	Annual Target / Plan Period Target	Data source								

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
			Number of affordable dwellings granted consent	Approx 4250 <u>1675</u> over Local Plan Period	Planning decisions and appeals <u>Authority Monitoring Report</u>			integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.						
			Number of planning decisions including appeals allowing a lower level of affordable provision than set out in the policy not compliant with policy S6.	n/a	Planning decisions and appeals									
			Number of affordable home completions (and as a % of total net completions)	n/a	Planning decisions and appeals Authority Monitoring Report									
			Number of households on the Housing Register	Reducing over the plan period	Housing register									
MM149	142	Policy S7 Specialist housing	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Number of planning decisions including</td><td>In line with site allocations and all</td><td>Planning appeals and decisions</td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	Number of planning decisions including	In line with site allocations and all	Planning appeals and decisions	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the
Indicators	Annual Target / Plan Period Target	Data source												
Number of planning decisions including	In line with site allocations and all	Planning appeals and decisions												

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			appeals allowing specialist accommodation	other proposals consistent with the requirements of policy S7.	<u>Authority Monitoring Report</u>		integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
			Number of specialist dwellings lost	No net loss of plan period.	Planning appeals and decisions <u>Authority Monitoring Report</u>		
			Number of additional specialist dwellings and bedrooms	n/a <u>Increase in specialist accommodation over the plan period to assist in meeting identified needs</u> <u>Elderly and Extra Care</u> <u>Student accommodation</u>	Completions, planning appeals and decisions <u>Authority Monitoring Report</u>		
MM150	143	Policy S8 Gypsies, Travellers and	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
		Travelling Showpeople	Number of pitches permitted via planning decisions including appeals	18 gypsy pitches over the plan period	Planning decisions and appeals		HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
			Number of pitches lost via planning decisions including appeals	No net loss of pitches over the plan period	Planning appeals and decisions		
MM151	143	Policy S9 Economic Development	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping with the findings of the Addendum Report and no further LSEs that may compromise European
			<u>Loss/gain of employment floorspace in Epsom Town Centre</u>	<u>No net loss over plan period.</u>	<u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u>		
			Increase in floorspace in economic use at	34,500sqm of additional floorspace to be delivered on	Planning decisions and appeals		

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			the Strategic Employment Sites	strategic employment sites across the plan period				site integrity are foreseen.
			Loss of floorspace in economic use outside of the Strategic Employment Sites	Assess trends	Planning decisions and appeals			
			<u>Loss/gain of floorspace and land in use by the racecourse and racehorse training sector</u>	<u>No net loss over plan period.</u>	<u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u>			
			<u>Loss/gain of floorspace and land in use the creative and cultural sector and further and higher education providers</u>	<u>No net loss over plan period.</u>	<u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u>			

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM152	143	Policy S10 Retail Hierarchy and Network	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Number of planning decisions including appeals allowing main town centre uses outside of the centres	Assess trends <u>No specific target. Monitoring Only</u>	Planning decisions and appeals		
MM153	143	Policy DM4 Primary Shopping Areas and Retail Frontages	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Planning permissions approved in the town centre for appropriate town centre uses (as defined in the NPPF)	Assess trends <u>No specific target. Monitoring Only</u>	Planning decisions and appeals		
MM154	143	Policy DM5 Edge of Centre or Out of	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
		Centre Proposals	Number of planning decisions including appeals allowing main town centre uses outside of the centres	Assess trends <u>No specific target.</u> <u>Monitoring Only</u>	Planning decisions and appeals									
MM155	144	Policy DM6 Edge of Centre or Out of Centre Proposals	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Number of planning decisions including appeals allowing appropriate uses within the neighbourhood parade</td><td>Assess trends <u>No specific target.</u> <u>Monitoring Only</u></td><td>Planning decisions and appeals</td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	Number of planning decisions including appeals allowing appropriate uses within the neighbourhood parade	Assess trends <u>No specific target.</u> <u>Monitoring Only</u>	Planning decisions and appeals	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
Indicators	Annual Target / Plan Period Target	Data source												
Number of planning decisions including appeals allowing appropriate uses within the neighbourhood parade	Assess trends <u>No specific target.</u> <u>Monitoring Only</u>	Planning decisions and appeals												
MM156	144	Policy DM7 Loss of Employment Land	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Annual commercial, business and service (Class E) floorspace change (and cumulatively over the plan period)</td><td><u>Plan target - at least 41,464 sqm of additional employment floorspace</u> Assess trends</td><td>Planning decisions and appeals</td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	Annual commercial, business and service (Class E) floorspace change (and cumulatively over the plan period)	<u>Plan target - at least 41,464 sqm of additional employment floorspace</u> Assess trends	Planning decisions and appeals	Necessary for effectiveness	No. Potential implications of the allocation of a higher quanta of sites were assessed in the HRA Addendum and no adverse effects upon the integrity of European sites were anticipated. Therefore, the development proposed is in-keeping
Indicators	Annual Target / Plan Period Target	Data source												
Annual commercial, business and service (Class E) floorspace change (and cumulatively over the plan period)	<u>Plan target - at least 41,464 sqm of additional employment floorspace</u> Assess trends	Planning decisions and appeals												

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
							with the findings of the Addendum Report and no further LSEs that may compromise European site integrity are foreseen.
MM157	144	Policy DM8 Racehorse Training Zone	Policy DM8 <u>Epsom Downs Racecourse and the Racehorse Training Industry</u> Racecourse Training Zone			Title amended to reflect change.	No. The change introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source	Amended 'Racecourse' to 'Racehorse'. Necessary for effectiveness	
			Loss of land to non-equestrian uses in the defined Racecourse <u>Racehorse Training Zone</u>	No loss of land to non-racehorse training uses in the Racecourse <u>Racehorse Training Zone</u>	Planning decisions and appeals		
MM158	144	Policy DM9 Visitor Accommodation				Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source		
			Planning permissions or appeals granted for visitor accommodation (number of units and bedspaces)	No specific target. <u>Monitoring only</u> Assess trends	Planning decisions and appeals		

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Planning permissions or appeals granted for the loss of visitor accommodation (number of units and bedspaces)	No specific target. <u>Monitoring only</u> Assess trends	Planning decisions and appeals			
MM159	145	Policy S11 Design	Policy S11 Design <u>and Heritage</u>				Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source			
			Planning permissions refused based on the policy	No specific target. <u>Monitoring Only</u> Assess trends	Planning decisions and appeals			
MM160	145	Policy S12 Amenity Protection	Policy S12 <u>DM24</u> Amenity Protection				Title change to reflect the policy Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source			
			Planning permissions refused based on the policy	No specific target. <u>Monitoring Only</u> Assess trends	Planning decisions and appeals			
MM161	145	Policy DM10 Building Emissions Standards	Policy DM10 Building Emissions <u>and Energy</u> Standards				Title change & additional indicator Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source			
			Planning permissions <u>for residential use</u> approved supported	All <u>residential</u> <u>planning applications</u> relevant planning	Planning decisions and appeals			

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			by an appropriate Energy Assessment	applications are accompanied by an Energy Assessment <u>demonstrating policy requirements can be met.</u>				
			<u>Planning permission for non residential developments achieving BREEAM Excellent or any equivalent new standard</u>	<u>All new non-residential developments achieving BREEAM Excellent or any equivalent new standard</u>	<u>Planning decisions and appeals</u>			
MM162	146	Policy DM12 Health Impact Assessment	Indicators	Annual Target / Plan Period Target	Data source		Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Number of planning applications that include a health Planning permissions inclusion of an impact assessment, if required.	<u>All eligible applications to include a permissions include a health impact assessment, if required.</u> <u>No specific target, monitoring only.</u>	<u>Planning decisions and appeals</u> <u>ONS Health Data</u>			

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?									
MM163	146	Policy S13 Preserving identity of place with heritage	Policy S13 Preserving identity of place with heritage <table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Net gain/loss of listed buildings</td><td>No loss of designated heritage assets</td><td>Planning decisions and appeals</td></tr><tr><td>Number of listed buildings at risk</td><td>No increase in number of Listed Buildings identified as at risk</td><td>Buildings at risk register</td></tr></table>			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 deleted, monitoring indicator no longer necessary	No. Policy deletion introduces no further LSEs that may compromise European site integrity.
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														
MM164	146	Policy DM13 Development Impacting Heritage Assets	<table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td>Net gain/loss of listed buildings</td><td>No loss of designated heritage assets</td><td>Planning decisions and appeals</td></tr><tr><td>Number of <u>nationally</u> listed buildings at risk</td><td>No loss of designated heritage assets</td><td>Planning decisions and appeals</td></tr></table>			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 <u>nationally</u> listed buildings at risk	No loss of designated heritage assets	Planning decisions and appeals	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
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 <u>nationally</u> listed buildings at risk	No loss of designated heritage assets	Planning decisions and appeals														
MM165	146	Policy DM14 Shopfronts, new indicator	<u>Policy DM14 Shopfronts</u> <table><tr><td>Indicators</td><td>Annual Target / Plan Period Target</td><td>Data source</td></tr><tr><td><u>Planning appeals where the council refused permission for shopfronts for</u></td><td><u>No appeal decisions allowed relating to shopfront design.</u></td><td><u>Planning decisions and appeals</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Planning appeals where the council refused permission for shopfronts for</u>	<u>No appeal decisions allowed relating to shopfront design.</u>	<u>Planning decisions and appeals</u>	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.			
Indicators	Annual Target / Plan Period Target	Data source														
<u>Planning appeals where the council refused permission for shopfronts for</u>	<u>No appeal decisions allowed relating to shopfront design.</u>	<u>Planning decisions and appeals</u>														

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?						
			<u>being contrary to the council's shopfront policy</u>										
MM166	146-147	Policy DM15 Green Belt	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td>Number of planning decisions, including appeals, granting permission for inappropriate development in the Green Belt, where very special circumstances that outweigh harm have not otherwise been identified</td><td>Assess trends <u>No specific target, monitoring only</u></td><td>Planning decisions and appeals</td></tr></table>			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 <u>No specific target, monitoring only</u>	Planning decisions and appeals	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
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 <u>No specific target, monitoring only</u>	Planning decisions and appeals											
MM167		Policy DM16 Landscape Character (New indicator under DM15)	<u>Policy DM16 Landscape Character</u> <table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Planning applications and appeals within Area of great landscape value</u></td><td><u>No appeal decisions allowed for major development relating</u></td><td><u>Planning decisions and appeals</u></td></tr></table>			Indicators	Annual Target / Plan Period Target	Data source	<u>Planning applications and appeals within Area of great landscape value</u>	<u>No appeal decisions allowed for major development relating</u>	<u>Planning decisions and appeals</u>	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
Indicators	Annual Target / Plan Period Target	Data source											
<u>Planning applications and appeals within Area of great landscape value</u>	<u>No appeal decisions allowed for major development relating</u>	<u>Planning decisions and appeals</u>											

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
				to the landscape character policy				
MM168	147	Policy S14 Biodiversity and Geodiversity	Indicators	Annual Target / Plan Period Target	Data source		Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Condition status of SSSIs	<u>No Specific Target</u> Improvements to condition of SSSIs in line with targets in Local Nature Recovery Strategy	Site surveys			
			Condition status of SNCI	<u>No Specific Target</u> Improvements in condition status	Surveys and DEFRA returns			
MM169	147	Policy S45 DM25– Biodiversity Net Gain	Indicators	Annual Target/Plan Period Target	Data source			No. The change introduces no further LSEs that may compromise European site integrity.
			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	Planning decisions and appeals			

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
				specified in a site allocation policy			
MM170	147	Policy DM17 Trees, Woodlands and Hedgerows	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			New development proposals including landscape plans	All relevant qualifying planning applications to include appropriate landscape plans	Surveys and DEFRA returns		
MM171	147	Policy S16 Flood Risk and Sustainable Drainage	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Number of planning permissions granted contrary to Environment Agency advice on flooding and water grounds	No specific target. Number of planning applications permitted or appeals allowed contrary to advice of the Environment Agency	Planning decisions and appeals		
MM172	148	Policy DM18 Pollution and	Indicators	Annual Target / Plan Period Target	Data source	Necessary for effectiveness	No. The change introduces no further LSEs that may

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?									
		Contaminat ion	Number of planning decisions including appeals allowing development that is not in accordance with this policy	<u>No specific target.</u> Number of relevant planning applications that are not in accordance with the policy	Planning decisions and appeals			compromise European site integrity.									
MM173	148	Policy S17 Infrastructu re Delivery (additional indicator)	<table><tr><th>Indicators</th><th>Annual Target / Plan Period Target</th><th>Data source</th></tr><tr><td><u>Delivery of infrastructure schemes identified in the IDP as being delivered in years 1-5</u></td><td><u>Delivery of infrastructure achieved within anticipated timeframe.</u></td><td><u>Infrastructure Delivery Plan</u> <u>Engagement with infrastructure providers</u> <u>Authority Monitoring Report</u></td></tr><tr><td><u>Delivery of infrastructure schemes identified in the IDP as being delivered 'across all years'.</u></td><td><u>Delivery of infrastructure to support new development.</u></td><td><u>Infrastructure Delivery Plan</u> <u>Engagement with infrastructure providers</u></td></tr></table>				Indicators	Annual Target / Plan Period Target	Data source	<u>Delivery of infrastructure schemes identified in the IDP as being delivered in years 1-5</u>	<u>Delivery of infrastructure achieved within anticipated timeframe.</u>	<u>Infrastructure Delivery Plan</u> <u>Engagement with infrastructure providers</u> <u>Authority Monitoring Report</u>	<u>Delivery of infrastructure schemes identified in the IDP as being delivered 'across all years'.</u>	<u>Delivery of infrastructure to support new development.</u>	<u>Infrastructure Delivery Plan</u> <u>Engagement with infrastructure providers</u>	Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
Indicators	Annual Target / Plan Period Target	Data source															
<u>Delivery of infrastructure schemes identified in the IDP as being delivered in years 1-5</u>	<u>Delivery of infrastructure achieved within anticipated timeframe.</u>	<u>Infrastructure Delivery Plan</u> <u>Engagement with infrastructure providers</u> <u>Authority Monitoring Report</u>															
<u>Delivery of infrastructure schemes identified in the IDP as being delivered 'across all years'.</u>	<u>Delivery of infrastructure to support new development.</u>	<u>Infrastructure Delivery Plan</u> <u>Engagement with infrastructure providers</u>															

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
					<u>Authority Monitoring Report</u>		
			<u>Delivery of infrastructure required by Site Allocation policies</u>	<u>Infrastructure delivered to support new development.</u>	<u>Planning decisions.</u> <u>Infrastructure Delivery Plan</u> <u>Engagement with infrastructure providers</u> <u>Authority Monitoring Report</u>		
			<u>Local Cycling and Walking Infrastructure Plan (LCWIP) and Local Street Improvements (LSI).</u>	<u>No specific target.</u> <u>Priority LCWIP and LSI projects progressed over the Local Plan period.</u>	<u>Infrastructure Delivery Plan</u> <u>Authority Monitoring Report</u>		
			<u>Primary care facility at Horton Farm (SA35) or an equivalent financial contribution towards off-site provision of new or improvement</u>	<u>Estimated delivery date 2032 to 2037.</u>	<u>Planning Applications</u> <u>Infrastructure Delivery Plan</u>		

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			<u>to existing health facilities</u>		<u>Authority Monitoring Report</u>			
			<u>GP practice extensions / redevelopment / reconfiguration as needed</u>	<u>No specific target. Improvements to be delivered over plan period dependent upon need.</u>	<u>Infrastructure Delivery Plan</u>			
			<u>New Sports Hub for the borough to include playing pitches (grass and artificial), a new pavilion and changing facilities. Provision at site allocation SA34</u>	<u>Estimated to be delivered between 2032 and 2037</u>	<u>Planning Applications</u> <u>Infrastructure Delivery Plan</u> <u>Authority Monitoring Report</u>			
MM174	148	Policy S18 Green and Blue Infrastructure	Indicators	Annual Target / Plan Period Target	Data source		Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Number of planning decisions including appeals that secure the provision of green infrastructure through new development	<u>No specific targets. Monitoring only. Assess trends</u>	Planning decisions and appeals			

Ref	Page(s)	Policy no./ Para no.	Main Modification				Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			Number of planning decisions including appeals allowing the loss of existing green infrastructure	No <u>net</u> loss of existing green infrastructure	Planning decisions and appeals			
MM175	149	Policy DM19 Open Space, Sport and Recreation, second indicator					Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source			
			Number of planning decisions including appeals which create new or enhance open space or sport and recreational buildings/land	<u>No specific targets. Monitoring only.</u> Assess trends	Planning decisions and appeals			
MM176	149	Policy DM20 Community and Cultural Facilities					Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source			
			Gains/losses of Use Class F1 and F2 facilities	<u>No specific targets. Monitoring only.</u> Assess trends	Planning decisions and appeals			
			Developer contributions securing social and community infrastructure	<u>No specific targets. Monitoring only.</u> Assess trends	Funding and space secured (authority monitoring report)			

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
MM177	149	Policy DM21 Education Infrastructure				Policy deleted, indicator no longer necessary	No. Policy deletion introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source		
			Number of planning decisions including appeals allowing additional education floorspace	Assess trends	Planning decisions and appeals		
MM178	149	Policy S19 Transport				Necessary for effectiveness	No. The change introduces no further LSEs that may compromise European site integrity.
			Indicators	Annual Target / Plan Period Target	Data source		
			Percentage of developments supported by a Travel Plan <u>Applications supported by a Transport Assessment and on site plan to reduce car use and promote sustainable transport modes.</u>	100% of qualifying developments <u>All qualifying developments</u>	Planning applications, appeal monitoring, decisions and appeals <u>Authority Monitoring Report</u>		
			Use of sustainable travel modes	Increase in travel to work	Census — every 10 years		

Ref	Page(s)	Policy no./ Para no.	Main Modification			Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
				Modal share by sustainable travel modes in 2034 Census over 2024 baseline.	SCC data on sustainable transport.		
			<u>Number of car club vehicles and cycles available for public cycle rental schemes</u>	<u>No specific target. Monitoring only.</u>	<u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u>		
			<u>Number of LCWIP priority schemes implemented</u>	<u>No specific target. Monitoring only.</u>	<u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u>		
			<u>Number of car free developments implemented</u>	<u>No specific target. Monitoring only.</u>	<u>Planning decisions and appeals</u> <u>Authority Monitoring Report</u>		
MM179	153-160	Appendix 1: Glossary	Community Facilities: Includes, but is not limited to, facilities such as community centres and other community meeting places, healthcare facilities, education facilities, childcare facilities, public houses,			Replaced 'Community Facilities' in the glossary with 'Social Infrastructure and Community Facilities.	No. The change introduces no further LSEs that may compromise European site integrity.

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			the voluntary sector, public service providers, places of worship and cultural facilities including theatres and arts centres. <u>Social Infrastructure and Community Facilities:</u> Includes, but is not limited to, <u>healthcare facilities, education facilities, childcare facilities, leisure centres/sports halls, community centres/halls, libraries, public houses, the voluntary sector, public service providers, places of worship and cultural buildings such as theatres and arts centres.</u> <u>District Licencing Scheme:</u> Great crested newts are a European protected species. <u>District level licensing is an alternative approach to mitigation licensing for planning applications to develop sites which could affect great crested newts. The scheme is operated in accordance with Government Guidance.</u> <u>Essential Local Workers:</u> <u>Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers.</u> <u>Green and Blue Infrastructure (GI):</u> <u>Green and blue infrastructure includes individual natural components that are connected into network fulfilling multi-functional roles with multiple benefits to the local community, economy and environment. Green features may include (but are not limited to) open space, parks, public and private gardens, woodlands, playing fields, allotments, trees, green roofs/walls and blue features may include rivers, streams, footpaths and shared surfaces, green and sustainable drainage systems. A network of multi-functional</u>	Additional entry in the Appendix to define District Licencing Scheme Essential local workers housing defined in the glossary which is captured under policy S5 Amended definition to be consistent with S18 New entry for effectiveness	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
			green and blue space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. <u>High frequency bus corridor:</u> Sections of highway where bus services operate with a frequency of at least 3 bus services per hour, on average, for a weekday between the hours of 07:00 & 19:00. <u>Parking Stress:</u> The measure of the saturation levels of parking in a defined area and expressed in percentage terms. <u>Racecourse Area:</u> The track used by racehorses and the associated facilities, including the built area which constitutes the stables, stands, administration building, parade ring and hardstanding. <u>Racehorse Training Yards:</u> Specialised Thoroughbred equestrian facilities where thoroughbred racehorses are stabled. Facilities can include stables, paddocks/turnout pens, tack rooms, horse walkers, staff accommodation and other specialised training equipment. <u>Racehorse Movement Corridors:</u> Routes travelled by racehorses to and from training yards to access the racehorse training grounds. <u>Racehorse Training Grounds:</u> Specialised Thoroughbred equestrian facilities designed to condition and / or stable thoroughbreds for racing. This includes gallops which are managed to provide a variety of surfaces and terrains that mimic race conditions.	New entry necessary in relation to policy S11 New entry for effectiveness and consistency. Define Racehorse training terms in policy DM8 New entry for effectiveness and consistency, Social Infrastructure and Community Facilities	

Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?			
			Social Infrastructure and Community Facilities: Includes, but is not limited to, <u>healthcare facilities, education facilities, childcare facilities childcare facilities, leisure centres/sports halls, community centres/halls, libraries, public houses, the voluntary sector, public service providers, places of worship and cultural buildings such as theatres and arts centres.</u> Specialist Housing: Housing specifically designated to meet the identified needs of <u>specialised groups, such as the elderly, disabled or student population</u> elder people and people with support needs. It can include extra care housing.	defined consistent with DM20 Modified to ensure effectiveness by using appropriate definition				
MM180	162	Appendix 2: Housing Trajectory, page 162-163	See Appendix A1.	To include most up to date trajectory	No. The change introduces no further LSEs that may compromise European site integrity.			
MM181	169	Appendix 4: Vehicle Parking Standards, A4.1 third paragraph	<u>The car parking standards identified in this appendix are maximums.</u> In light of the above, there are likely to be situations where <u>lower levels of parking</u> less parking than the minimum standards are appropriate, specifically in Town Centre locations or where there are opportunities to access public transport by multiple modes (e.g., rail and bus).		No. The change does not introduce any new LSEs that may compromise European site integrity.			
MM182	178	Table A5 Types of Use and Minimum	<table><tr><td>Policy DM8 – Racehorse Training Zone</td><td>Racehorse training <u>industry</u> or equestrian</td><td>18- 24 months</td></tr></table>	Policy DM8 – Racehorse Training Zone	Racehorse training <u>industry</u> or equestrian	18- 24 months	Modifications for effectiveness and consistency with amended policy	No. The change does not introduce any new LSEs that may compromise European site integrity.
Policy DM8 – Racehorse Training Zone	Racehorse training <u>industry</u> or equestrian	18- 24 months						

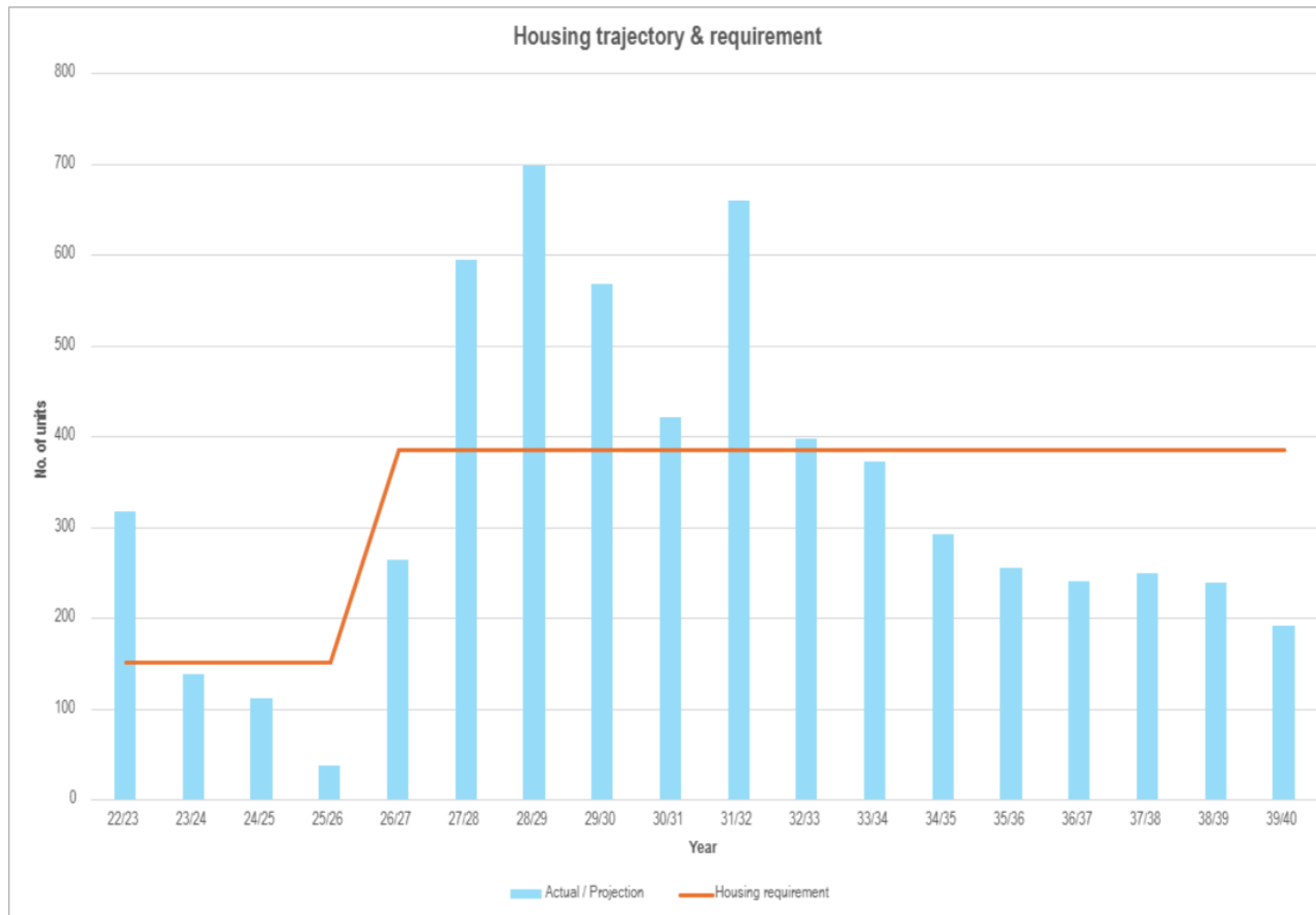
Ref	Page(s)	Policy no./ Para no.	Main Modification	Reason for modification	Does the MM trigger a change to the conclusions of the 2026 HRA Addendum or a new LSE?
		Marketing Periods			
MM183	185	Appendix 6: Guidance for Proposals Impacting Heritage Assets A6.2.1	A6.2.1 Scheduled Ancient Monuments and Areas of High Archaeological Potential The Borough contains two Scheduled Ancient Monuments (SAM) - the site of Nonsuch Palace and its associated remains, and St Mary's Church Tower in Ewell. Additionally, there is one identified County Site of Archaeological Importance in the Borough - 'Diana's Dyke', a site close to Nonsuch Palace. All proposals will be expected to follow all National Government and County National and County Policy and Guidance regarding these sites. In the majority of instances, the advice of Surrey County Council should also be sought. <u>Scheduled Monument Consents are determined by Historic England and not local authorities.</u> 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 <u>is inconclusive, or</u> suggests the likelihood of archaeological remains, the Council will require the results of an archaeological evaluation in order to inform the determination of the application.	Modification necessary for effectiveness	No. The change does not introduce any new LSEs that may compromise European site integrity.

Appendix A1: Housing Trajectory

SOURCE	No. of units	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	TOTAL
Completions (2022-2026)	605	317	139	112	37															605
Commitments (April 2026) - 671 with 10% lapse rate applied 604	604					200	200	204												604
Small windfall	385								35	35	35	35	35	35	35	35	35	35	35	385
Large windfall	333										37	37	37	37	37	37	37	37	37	333
URBAN SITES (20+)																				
SA1 - Southern Gas Network Site	456						225	116	115											456
SA2 - Hook Road Car Park	145								145											145
SA3 - Solis House, 20 Hook Road	20								20											20
SA4 - Bunzl, Hook Road	35					35														35
SA5 - Epsom Town Hall	90						50	40												90
SA6 - Hope Lodge Car Park	35										35									35
SA7 - Former Police and Ambulance Station Site	47						47													47
SA8 - Epsom Clinic	30							30												30
SA9 - Depot Road & Upper High Street Car Parks	100									50	50									100
SA10 - 79-85 East Street	34							34												34
SA11 - Finachem House, 2-4 Ashley Road	38							38												38
SA12 - Global House	75								75											75
SA13 - Swail House	45						45													45
SA14 - 60 East Street	30					30														30
SA16 - Land at Kiln Lane	40													40						40
SA17 - Hatch Furlong Nursery	30								15	15										30
SA18 - Land rear of Rowe Hall	96							96												96
SA22 - Etwelle House, Station Road	20						20													20
SA40 - Land west of Ewell By-Pass	38																	38		38
SA41 - Conservative Club, Epsom Club and Church	28																28		-	28
SA44 - Spread Eagle Shopping Centre	22																		22	22
SA47 - Eclipse Business Park, West Hill	23														23					23
SMALL URBAN SITES (5-19)																				
SA15 - Corner of Kiln Lane & East Street (101B East Street)	5							5												5
SA19 - 7 Station Approach, Stoneleigh	8						8													8
SA20 - Esso Express, 26 Reigate Road	10							10												10
SA21 - Richards Field Car Park	7								7											7
SA24 - Garages at Somerset Close & Westmorland Close	6								6											6
SA25 - 64 South Street, Epsom	6							6												6
SA26 - 35 Alexandra Road	8							8												8
SA27 - 22-24 Dorking Road	18							18												18
SA28 - 63 Dorking Road	6							6												6
SA36 - 25 Alexandra Road Epsom Surrey KT17 4BP	11														11					11
SA37 - Gainsborough Road estate, Epsom	8										8									8
SA38 - Parking at 54 Gainsborough Road	6									6										6
SA39 - 85b Hook Road, Epsom	8															8				8
SA42 - TK Maxx	17																	17		17
SA43 - Land R/O The Albion Public House (McCaffertys Bar)	11															11				11
SA45 - Auction House, Depot Road	10																		10	10
SA46 - Laine Theatre Arts	6											6								6
GREEN BELT RELEASE																				
SA31 - Land at West Park Hospital - South	50							50												50
SA32 - Land at West Park Hospital - North	180								60	60	60									180
SA33 - Land at Chantilly Way	30								15	15										30
SA34 - Hook Road Arena	100									40	40	20								100
SA35 - Horton Farm	1250									50	100	150	150	150	150	150	150	150	50	1250

SOURCE	No. of units	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	TOTAL
SA48 - Cuddington Glade	37							37												37
SA49 - Land off Cuddington Glade	45										45									45
SA50 - Land at Priest Hill	275								75	100	100									275
SA51 - Downs Farm	530									50	150	150	150	30						530
Actual / Projection		317	139	112	37	265	595	698	568	421	660	398	372	292	279 256	241	250	239	192	6052

Appendix A2: Housing trajectory & requirement



Habitats Regulations Assessment

Sustainability Appraisal

Strategic Environmental Assessment

Landscape Character Assessment

Landscape and Visual Impact Assessment

Green Infrastructure

Expert Witness

Ecological Impact Assessment

Habitat and Ecology Surveys

Biodiversity Net Gain



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