

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



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1 Introduction

1.1 Purpose

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

1.2 Local Plan Update

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

1.3 Issues & Options Consultation

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

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

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

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

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

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

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

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

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

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

Preparation of a local plan

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

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

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

¹ National Planning Policy Framework Paragraph 47.

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

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

2 Consultation Preparation

2.1 Background

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

2.2 Previous consultations

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

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

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

Table 1: Timetable of previous Local Plan consultations

2.3 Councillors

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

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

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

Table 2: All Members' Briefing Timetable

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

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

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

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

2.4 Internal departments

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

2.5 Borough Insight and E-Borough Insight

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

2.6 Local community groups

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

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

3 Issues & Options Consultation

3.1 Overview of consultation methods adopted

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

Table 3: Overview Consultation Methods Adopted

3.2 Local Plan Consultation Paper and website

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

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

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

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

3.3 Local Plan Member Drop In Sessions

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

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

Table 4: Local Plan Member Drop in Sessions Attendance

3.4 Local Plan Question & Answer Sessions

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

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

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

3.5 Public meetings

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

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

Table 6: Public Meetings

3.6 Other communication techniques

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

3.7 Who was consulted and how?

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

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

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

³ Head of Place Development attended.

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

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

4 Responses to the Issues & Options Consultation

4.1 Overview of responses received

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

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

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

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

4.2 Feedback from public meetings and question and answer sessions

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

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

⁴ Including 5 questionnaire responses sent via email or post.

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

4.3 Review of the questionnaire responses

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

Officer Comment:

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

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

Officer Comment:

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

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

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

Officer Comment:

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

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

Officer Comment:

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

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

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

4.4 **Review of the written representations**

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

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

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

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

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

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

4.5 **Overview of key issues raised**

Assessment of housing need

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

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

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

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

Officer Comments:

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

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

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

Affordable housing

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

Officer Comments:

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

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

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

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

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

Meeting housing need

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

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

Officer Comments:

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

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

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

Green Belt

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

Officer Comments:

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

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

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

Parks and open spaces

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

Officer Comments:

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

Character of the area

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

Officer Comments:

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

Infrastructure

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

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

Officer Comments:

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

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

Suggested alternative approaches

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

Officer Comments:

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

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

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

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

Sites Promoted for consideration

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

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

Table 7: Sites suggested for consideration

Officer Comments:

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

Other issues raised

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

Officer Comments:

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

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

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

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

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

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

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

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

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

4.7 Sustainability Appraisal

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

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

⁵ The Environment Agency, Historic England and Natural England

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

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

5 Next Steps

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

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

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

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

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

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

- Recent case law, plan examinations and the HWP indicates that the 'exceptional circumstances' to amend the Green Belt boundary through the local plan are centred around meeting housing need.

3. Unmet OAHN:

- Discussion to whether the unmet OAHN could be accommodated elsewhere within the housing market area or beyond.

4. Building affordable homes:

- TM stated the SHMA identifies an high affordability need
- Future housing developments must deliver affordable homes.
- TM strongly advocated that the SCC Joint Venture sites (1 has been identified within Epsom) must solely deliver social affordable housing.

5. Infrastructure:

- Discussion in relation to the implications on infrastructure and infrastructure planning and delivery.
- SC advised that existing infrastructure was under significant pressure.
- TM made reference to the Surrey County Council Infrastructure Study which is being updated.
- KJ advised that ensuring the provision of supporting infrastructure was central to ensuring the delivery of sustainable growth. However, the NPPF and recent local plan examinations make it clear that infrastructure issues are not an absolute constraint to development.

6. Consultation:

- RT & KJ advises how the consultation had been advertised.
- RT advised that Officers had been working closely with Members and community groups such as CPRE in preparing the Issues & Options document and evidence base.
- RT advised that Officers had been holding Q&A sessions for community groups and attending local public meetings.
- KJ advised that it was extremely beneficial to utilise existing community networks including the Resident Association networks.

		<ul style="list-style-type: none"> ➤ TM advised that CPRE may undertake a local leaflet drop to raise the profile of the consultation.
19 October 2017- 2pm	<p>Epsom Civic Society (ECS)</p> <p>Carol Reed-ECS</p> <p>Alan Baker-ECS</p> <p>Rob Austen-ECS</p> <p>Mark Bristow-ECS</p> <p>Angela Clifford-ECS</p> <p>Ishbel Kenward-ECS</p> <p>Margaret Hollins-ECS</p> <p>Rachael Thorold – Senior Planning Policy Officer</p> <p>Karol Jakubczyk – Planning Policy Manager</p>	<p>The following provides an overview of the Local Plan Question & Answer Session with Epsom Civic Society:</p> <p>Discussion:</p> <ol style="list-style-type: none"> 1. Consultation and raising awareness of the local plan Issues & Options: <ul style="list-style-type: none"> ➤ RT & KJ advised how the consultation had been advertised. ➤ RT advised that Officers had been working closely with Members and community groups such as CPRE in preparing of the Issues & Options document and evidence base. ➤ RT advised that Officers had been holding Q&A sessions for community groups and attending local public meetings. ➤ KJ advised that it was extremely beneficial to utilise existing community networks including the Resident Association networks. ➤ ECS advised they will be having an open meeting end of October/ early Nov to discuss the consultation with their members and that ECS would be promoting the society on Saturday 28th October in the Ashley Centre. RT &KJ offered their support and attendance at the open meeting. 2. Plan making process and programme: <ul style="list-style-type: none"> ➤ RT & KJ outlined where the Council was its plan making process, including why there was the need to review the Local Plan and the implications of the outcomes of the key evidence base studies. ➤ RT highlighted the further work that is being undertaken on constraints and infrastructure. 3. Addressing Unmet Housing Need <p>KJ &RT raised the issue of responding to unmet housing need. Discussion of the Duty to Co-operate and current work being undertaken with Housing Market Area partners.</p> 4. Infrastructure: <ul style="list-style-type: none"> ➤ Discussion in relation to the implications on infrastructure and infrastructure planning and delivery. Agreed that the existing infrastructure was under significant pressure.

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

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

Karol Jakubczyk –
Planning Policy
Manager

- RT advised that Officers had been working closely with Members and community groups such as CPRE and ECS in preparing the Issues & Options document and the evidence base.
- RT advised that Officers had been holding Q&A sessions for community groups and attending local public meetings.
- KJ advised that it was extremely beneficial to utilise existing community networks including the Resident Association networks.

2. Vision:

- BM commented that the Council had no vision for the Borough and advised that she thought Epsom town centre was failing and that the Borough lacked identity or uniqueness.
- BM stated that the Local Plan needed to be clear on who Epsom was for, the type family it wished to attract and who the new homes would be for.
- RT & KJ sought to advise that the housing need was outlined in the SHMA and there was not the mechanism for the Local Planning to prescribe what type of family or person could reside in the Borough and live in the new homes.
- RT sought to provide advice on the purpose of the local plan and the remit of the update.

3. Design: Conservation Area, Shopfronts and roof profiles

- BM advised that there have been no examples of good design within the Borough and that any new development should adhere to prescribe design codes including restrictions on roof profiles in conservation areas.
- KJ sought to advise that design was subjective and to accordance with national planning policy design codes could not be prescriptive.
- RT advised that she would circulate the Council's current conservation, design and shopfront policies.

4. Town centre sites:

- GD advised that town centre sites should be walkable and that he would of expected that would deliver the shortfall in housing.
- RT advised that town centre development sites (as per Plan E) had been included in the Borough land supply position and it was important not to overestimate their capacity.

		<p>5. Housing need vs a housing target:</p> <ul style="list-style-type: none"> ➤ BM advised that she was aware of the Housing White Paper and the Planning for the Right Homes in the Right Places consultation and she had been speaking to the SoS with regards to housing need and a housing target. BM advised that unmet need would not be an issue and that she would resolve this with the forthcoming Planning Inspector. <p>6. Next steps:</p> <ul style="list-style-type: none"> ➤ BM & GD offered their supporting going forward.
<p>23 November 2017-2pm</p>	<p>Surrey County Council: Kath Harrison- Spatial Planning, SCC</p> <p>Steve Howard-Transport Policy & transport Strategy Manager, SCC</p> <p>James Green-SCC</p> <p>Nick Healey-SCC</p> <p>Gemma Joyner-Principal Transport Planner, SCC</p> <p>Rachael Thorold – Senior Planning Policy Officer, EEBC</p> <p>Karol Jakubczyk – Planning Policy Manager, EEBC</p>	<p>The following provides an overview of the Local Plan Session Surrey County Council colleagues in relation to the impact of growth on the highway and transport network:</p> <p>Discussion:</p> <ol style="list-style-type: none"> 1. Review of the Local Plan <ul style="list-style-type: none"> ➤ KJ outlined where the Council was in reviewing its local plan and its housing target based on the OAHN figures. ➤ KJ briefed SCC colleagues on the 4 options put forward in the consultation. ➤ RT advised that land supply was current a constraint despite call for site exercises. 2. Understanding the highway capacity <ul style="list-style-type: none"> ➤ Evidence is indicating that the road network is at capacity to support the private motor vehicle at peak travel times. ➤ Agreed that are limited opportunities to increase that capacity (in terms of the availability of land and funding). 3. Reviewing existing assumptions on future travel patterns <ul style="list-style-type: none"> ➤ Question where there is a need to take a proactive approach to getting people out of their private motor cars and on to sustainable travel modes ➤ Discussion to whether the next generation will be so wedded to private motor vehicle 4. Considering an appropriate strategy <ul style="list-style-type: none"> ➤ Acknowledged that there is no coherent strategy across Surrey in relation to congestion.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix 4- Consultation List

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