

ECS EPSOM CIVIC SOCIETY

Shaping the future, safeguarding the past

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To Whom It May Concern

Epsom & Ewell Borough Council: draft Local Plan Regulation 18 Public Consultation – Responses from Epsom Civic Society

About Epsom Civic Society

Epsom Civic Society was founded in 1959 as Epsom Protection Society, at a time when many historic and architecturally valuable buildings and houses in Epsom and Ewell were being threatened by developers. Then, our primary role was to halt the destruction of Epsom's heritage and to ensure that new development was compatible with the traditional character of the town. In 2011, our name was changed to Epsom Civic Society. Our purpose continues to be to protect the heritage of Epsom and to encourage high standards of new planning and building; but the change of name reflects the wider concerns of the Society to promote civic pride and to inspire progressive improvement in the quality of local life for everyone. The Society is an unincorporated association with an executive committee and a constitution that requires us to prepare accounts and hold an annual general meeting. We have over 1650 members. The Society is a founder member of Civic Voice, the national charity for the civic movement in England, and shares common aims with other civic societies.

Responses are submitted on the Society's behalf by our Chair, Margaret Hollins, following consultation with and input from the Society's committee and other Society members.

Executive Summary

Local plans, drawn up by local authorities, need to be developed within a framework that is set by central government in consultation with a wide range of stakeholders- including local authorities themselves.

It is a major challenge for local authorities to go through the process of setting out their local plans where the framework set by central government is shifting and unstable. This is currently the position that EEBC and local authorities around the country find themselves in. There have been over three years of consultations by central government with indications of more to come. Policy direction has moved from zoning to no zoning, from so-called mandatory housing targets to advisory targets -that are effectively inescapable and therefore mandatory.

Therefore, most critical for EEBC in developing its local plan are the following questions:

- 1) should the Local Plan challenge the Government's standard method for assessing housing need?
- 2) if the answer to the first question is yes, then what should the housing requirement be?
- 3) and, where this total is determined, where should these homes be built within EEBC?

Epsom Civic Society's response to the draft Local Plan considers these three overarching questions before addressing the 50 individual policy and site allocation questions set out in the council's consultation questionnaire document.

1) Should the Local Plan challenge the Government's standard method for assessing housing need?

The draft Local Plan moves away from the standard method for assessing housing need. ECS considers the move is justified on three grounds set out below:

Timing: following the standard method and basing local plans on 2014 housing projection data for a plan that will be finalised by 2026 and cover the period to 2040 is unreasonable. More recent data projections indicate significantly smaller housing growth by 2040.

Promises of change in direction need to take effect: repeated formal and informal (ministerial) central government announcements of a change in direction in relation to housing needs assessments are not followed through in a timely manner. This is an unacceptable and unaccountable approach to government. Our local MP needs to use his influence to ensure changes announced are implemented in a timely manner. The Planning Inspectorate in assessing the soundness of local plans cannot insist on use of 2014 data when this approach to consistency is clearly resulting in housing needs significantly out of sync with more recent and relevant housing and population projections.

Maximising the chance of a positive outcome: if there is no challenge to the standard method, then EEBC will face an increase of over 30% in its households by 2040 – with adverse consequences for the green belt, pollution, loss of historic market town character. It is vital that the case is put for moving away from the standard method if we are to be able to work

towards a housing needs level that is achievable and allows the borough to retain its attractive character that makes it a place where people want to live, work, and learn.

2) What should the housing requirement be?

Options: 10,000 v 5,000 v 4,000 v 2,000 new homes

10k to 11k – too much

5k to 6k – better but could be less

4k – compromise reflecting balance point between 2k and 6k

2k – should be starting point as reflects natural growth rates.

3) Where should these dwellings be built?

Assuming a housing needs requirement of c4,000 by 2040 then it can be met as follows:

Brownfield sites but keeping densities low and building heights limited to 6 storeys in the town centre and 4 storeys outside.

Retain Green Belt in all but exceptional cases, use less than 1% of Green Belt (at maximum).

Affordable housing: Policy S7 is a commendable attempt to maximise affordable housing and the Society supports it. Delivery of housing that is truly affordable is absolutely vital. We lack confidence in the policy's capacity to deliver and it does not address the real need which is for **social housing**.

Social housing: Social housing provision needs attention from HMG, who have been responsible for the conspicuous absence of new social housing development since the 1980s. Councils need the means and the will to resume council house building.

Climate Change, Sustainable Development and Net Zero / Zero Carbon

The Society welcomes Policy S5, Climate Change Mitigation and Adaptation. Given the climate emergency we are facing, and for the avoidance of doubt, we suggest that the plan should state that Policy S5 has priority over other policies in the draft plan.

Preliminary observations on this consultation

Overview

The Society welcomes the publication of the draft Local Plan for consultation. The longer the borough lacks an up-to-date adopted Local Plan, the longer local vulnerability to speculative development persists. In our view, the major contributor to delay in completing Local Plans is the constant changing of HMG policy and quasi-statutory documentation such as the National Planning Policy Framework (NPPF). For local authorities engaged in strategic planning, uncertainty at central government level presents an unhelpful and challenging context for effective management of transformational change locally, especially in determining how many new homes by 2040, where to build them and who they should be for.

Epsom and Ewell is an attractive place to live. It has retained its market town character, has substantial natural green open spaces and landscapes, high levels of employment and spacious, well laid out residential areas.

The draft Local Plan is an important opportunity to consider how the borough will develop over the next two decades and beyond. Key to this development is agreeing the scale of population and household growth that will need to be accommodated.

Local Plan policies must reflect community priorities in shaping the future of the borough - retaining the borough's attractiveness as a place to live, work & learn while growing sustainably. The Society supports appropriate, well-designed, environmentally responsible development reflecting the impact of the built environment on residents' wellbeing and on quality of life for the wider community. Inappropriate development undermining the Borough's character must be resisted.

More specifically

Housing (Chapters 3, 4 and 5)

There are national aspirations for new house building (the oft quoted '300,000' pa) which are often hard to reconcile with what is happening at a local level. While the Government's standard method for assessing housing need for the borough indicates that there should be a 30%+ growth in EEBC households by 2040, the draft Local Plan proposes a housing growth figure of 18% - and projecting forward the actual housebuilding rate in Epsom and Ewell over the last 15 years shows a growth of 12% by 2040. Meanwhile the ONS 2018 household projections dataset (looking at birth and death rates and migration into and out of the Borough) shows an 8% growth by 2040 for EEBC.

Choosing the most relevant forward projection on which to base the Local Plan therefore makes a substantial difference as to where to build.

Adopting a high-level projection (30%+ growth) means either building up (tower block living on brownfield sites) or use of Green Belt land or both – some 500 to 600 new homes every year for the next nearly 20 years.

At the other end of the scale, a low level projection eg 8% indicates no need to take Green Belt sites and a level of build, at 135 houses pa, that is just over half of what has been achieved, on average, over the past 15 years.

The draft Local Plan proposes a middle path that requires some densification of build on brownfield sites in Epsom town centre, some backland development, and the use of 3.6% of Green Belt land – while protecting existing major employment sites in the Borough at Kiln Lane and Longmead.

Alternatively moving the household projections down to a level between the actual house building rate (12%) and the ONS births/deaths/migration rate (8%) would allow:

- all the Green Belt to stay protected
- reduce the need for densification (and increased building height) in the rest of the borough, while retaining existing light industry employment centres.

With fewer developments to manage, there can be more focus on ensuring delivery of affordable, environmentally sustainable, well-designed homes with adequate transport, water and other infrastructure which has often failed to keep up with expansion in recent years.

In the event of the ONS 2014 household projections dataset being replaced for planning purposes by more up-to-date figures (2018 dataset or later) further scenario planning *now* for such an eventuality would contribute additional flexibility to the draft Plan and avoid central government policy shifts undermining its robustness.

Housing Numbers: a compromise

The housing numbers calculation is key. The plan's sole reliance on the 2014 central government formula as a baseline, being 9 years old, is risky (see above), even bearing in mind the recent statement from the Secretary of State confirming the figures are advisory and not mandatory. This sole reliance fails to acknowledge and cater for both anticipated changes to national planning policy (May 2023 and likely again in 2024/25) and the existence (albeit not yet officially for Local Plan purposes) of the ONS 2018 household projection figures for England which produce a figure of 135 new dwellings per year referred to above. Given the local housing need, that is probably too low a figure to suggest, but a compromise could be:

- (A) to take an average of the draft plan proposal (327) dwellings/year and the above 2018 calculation (135) that produces a figure of 231
- (B) that the average rate of completions pa for the period 2007/8 to 2021/2 (15 years)- data from EEBC – is 224 which is close to the average of EEBC proposal and ONS data
- (C) Average of figures produced under (A) and (B) above ie

$$\frac{231+224}{2} = 228$$

The table on the next page sets out the figures in more detail. The diagram on page 5 sets out the options in a decision tree.

How many new homes should be built in Epsom and Ewell area by 2040?

Source:	Housing completions per year	...in total by 2040	% increase over current no of households <small>(note 5)</small>
Central government formula <small>(Note 1)</small>	576	10.4k	32%
Draft E&E local plan proposal <small>(Note 2)</small>	327	5.9k	18%
Actual number new homes built in EEBC area <small>(Note 3)</small>	224	4.0k	13%
Office for National Statistics – household projections <small>(Note 4)</small>	135	2.4k	8%

References

Note 1- from EEBC draft Local Plan 1 Feb 2023, page 47, para 3.6

Note 2 - EEBC draft Local Plan 1 Feb 2023, page 57, table 3.1

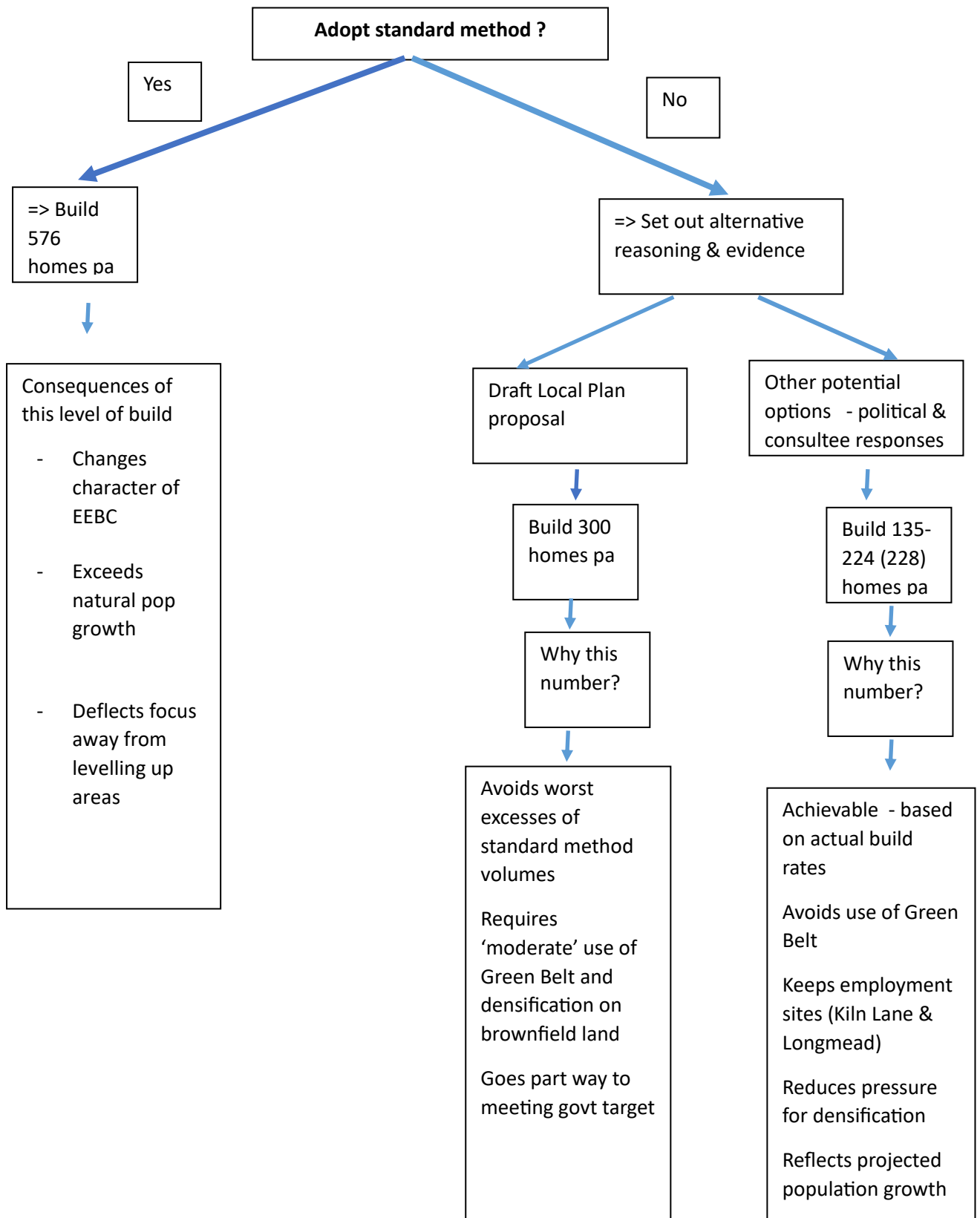
Note 3 - EEBC Authority Monitoring Report 2021/22, Table 4, taking average of housing completions pa for 15 years 2007/8 to 2021/2

Note 4 - ONS stats, Household Projections for England, 2018-based, table 406 for period 2022 to 2040 , calculation based on data from EEBC row from table

Note 5 - uses 2022 base of 32,042 households in EEBC area by end of 2021/22. HEDNA report 2023, Table 13

How many houses in Epsom and Ewell by 2040?

Assessing options decision tree



Housing Numbers: Green Belt impacts

In answer to a possible comment that recent years have seen a very poor performance on housing completions in EEBC figures, there are peaks and troughs, and they have to be viewed over a longer term, for example major housing build on the old hospital sites in the 'Epsom Cluster' (previously developed land in the Green Belt) in the period since its commencement in the 1990s. The early part of the previous plan period was heavily loaded with the hospital cluster completions and large flatted development in the town centre.

Cognisance must be given that Epsom & Ewell is the smallest borough in Surrey yet with the highest density of population per hectare. Land is finite, there has to be a limit when we are 'full-up', especially when central government signals that Green Belt does not need to be reviewed or altered when making plans. It is the Society's view that review or alteration of Green Belt should be a decision for the local planning authority.

To continue at the same rate of future development for the plan period (18 years) as the past 15 makes sense. Therefore, a figure of around 228 new dwellings per year seems a sensible projection.

The Green Belt is important to preserve, and we should not be proposing developments within that for future housing needs, save in exceptional circumstances. The Society has traditionally resisted development in the Green Belt, however we recognise that there may be certain Green Belt sites that could benefit from sensitive and contextually appropriate (re)development. We also recognise the implications for the townscape, particularly in terms of unacceptable increases in building heights and unacceptable densities detracting from the character and heritage of the town if Green Belt development is always off-limits. Good design and robust design codes are key.

An annual build figure of 228 means that over 18-year period of the Local Plan, 4,104 new dwellings will be required (ie 228 pa x 18 years). This total could be met as follows (using data extracted from Table 3.1 of draft Local Plan)

	Nos of new dwellings	Comments
Commitments	1041 Note 1	
Town Centre site allocations	1070 Note 1	
Urban Land Availability Assessment (LAA) sites	1042 Note 1	NB Includes sites where no application nor agreement to use of site for development
Windfall	561 Note 1	
Sub total	3714	
New dwellings required in period 2022 – 2040	4104	Based on ONS 2018 household projections
Shortfall (ie 4104 less 3714)	390	
Shortfall could be met from further brownfield intensification and / or use of marginal Green Belt land		Note 1 – data from Table 3.1 of draft Local Plan

If all of the shortfall of 390 dwellings were met from Green Belt land, the percentage of Green Belt land used can be estimated as follows:

- current draft local plan proposes use of 3.6% of Green Belt land to build 2,175 dwellings
- using the same ratio of Green Belt land to dwellings, to build 390 dwellings would require 0.65% of Green Belt land. While this would require careful and sympathetic use of Green Belt land, it would be less than one fifth of the use of Green Belt proposed in the draft Local Plan.

To avoid the need to build on **any** Green Belt land, an annual build figure of 206.33pa (ie $206.33 \times 18 \text{ years} = 3,714$) would be required. This would be just below the average annual build figure of 224 but still well above the 2018 ONS household projection of 135 new dwellings pa.

Housing Numbers and a new Local Plan: further thoughts

We have been watching with interest the development plan process in nearby authorities and have noted the wider national uncertainty and delays affecting plan-making in anticipation of amendments to the NPPF and the planning reforms in the Levelling-up and Regeneration Bill.

There is never a right time to publish a Local Plan draft and start the process, not least because of seemingly eternal prevarication by central government on planning law and policy reform. Given the remote prospect of clarity on reforms being forthcoming in a timeframe compatible with this draft Plan's timetable for adoption, the 2014 dataset remains officially the one to use for planning purposes. Nevertheless, the Society would like to see some further reflection in the draft Plan on whether exceptional circumstances exist to justify at this stage, and without interruption of the process, the move to the 2018 housing need projections.

We note the experience of Elmbridge BC (EBC) in unsuccessfully attempting to avoid the application of the standard method in assessing its housing need. We suggest, however that there are three approaches for EBC to consider in order to move away from the standard method. These approaches are:

- recognising the differences in **timing** of EBC and EBC local plans
- ensuring promised **changes in direction take effect**
- challenging the standard method holds the **best chance of a positive outcome.**

(i) Recognising differences in timing

EBC's local plan covers the period 2021 to 2037. It was issued *before* the latest Govt consultation on the National Policy Planning Framework (*Government Consultation: Levelling-up and Regeneration Bill: reforms to national planning policy*) was issued in Dec 2022 and on which consultation closed on 2 March 2023.

This proposed latest version of the NPPF indicates (albeit in an at times confused way) that the intention is to give more power to local communities over planning in their local area and emphasises that the housing needs assessment produced by use of a standard formula is only

advisory. Further consultation steps on the NPPF are flagged up as being due in the coming year.

EEBC, in contrast to EBC, is at the first stage of preparing its local plan and the plan is timetabled to be fully completed by 2026 and then run to 2040. It is therefore more appropriate for consultees on EEBC's plan to more fully reflect on:

- the evolving and **diminished status of** the housing needs assessment **standard method**
- **more up to date household and population projection data** which indicates declining rates of growth relative to earlier projections. These reductions in growth rates are at a local level, nationally and also reflected across Europe's leading economies
- sticking with **2014 projections for a plan** that will be finally issued **12 years later** (in 2026) is surely **challengeable on grounds of unreasonableness** especially where the more recent projections are markedly different and lower than those from 2014
- the need to make sense of the term **'advisory' as opposed to 'mandatory'** in relation to the housing needs assessment. If a marked **change in projections is not deemed 'exceptional'** and EEBC is forced into granting applications for excessive numbers of houses by 2040, then the **distinction** between 'advisory' and 'mandatory' is in effect **meaningless** and the Govt should be upfront and say the standard method is mandatory.

(ii) Ensuring promised changes in direction take effect

There have been repeated formal and informal (ministerial) central government announcements that rules are to change in relation to housing needs assessments and then a failure to follow through in a timely manner. This makes the position for local authorities attempting to prepare local plans uncertain, unproductive, and largely unworkable. The experience of EBC and Mole Valley District Council illustrates the difficulties of making plans when the basis for these plans is in a high and continuing state of flux. This suggests:

- **central government must be held to account for its conduct** in announcing changes to planning policy
- our local MP should use his influence to push the Govt to **resolve the uncertainty over housing numbers** or give local authorities more discretion in making plans
- the Planning Inspectorate must recognise the difficulties facing local authorities in making local plans – it cannot fix 2014 as a base date for all plans **irrespective of changes taking place to demographics**. Any benefit in terms of consistency in requiring authorities to use 2014 data is more than outweighed by use of out-of-date data producing **poor plans which help no one**.

(iii) Challenging the standard method holds the best chance of a positive outcome

A challenge to the standard method in EEBC's Local Plan, strengthened in principle by supportive consultee responses, produces the best chance of getting a housing 'requirement' that is less than 10k by 2040. Accepting the result of the standard method assessment will result in a figure of 10k or possibly more, endorsed by the Planning Inspectorate. Any consequent reduction of this figure would be *solely dependent* on the Inspector's acceptance of the nature and extent of local 'constraints' as set out in the Plan.

Assessing individual site allocations for housing: Green Belt

There is one minor 'tinkering to the edges' in that of site SA7 (Chantilly Way). This road was constructed in 1990's to facilitate access to the hospital cluster. It cut across the edge of Horton Farm leaving a buffer strip behind the houses in Brettgrave which provided separation from the new road. The residual strip should have been de-classified to become non-Green Belt in past plan reviews but was not. **No objection is raised to the SA7 proposal.**

For **SA5** land at West Park Hospital, this is previously developed land in the Green Belt accommodating a former hospital building now 100 years old. **No objection is raised to its redevelopment for housing.**

The remaining three Green Belt site allocations – SA6, SA8, SA9 **should not be considered** for development and should be removed from the proposals.

Assessing site allocations for housing and other development: Brownfield Sites

The Society supports brownfield sites listed as proposed to go forward within the plan, namely, SA1, SA2, SA3, SA4, all within the town centre. **The question of limits to building heights here and outside this area need to be defined by a clear policy in the draft plan to replace Policy DM13**, (Building Heights, Development Management Policies Document (2015)). We suggest that **6/7 storeys be the maximum for the town centre with 3/4 storeys elsewhere**. These are to eaves level. There may well be a case for allowing mansard/rooms in the roof's construction in addition. The replacement building heights policy should be supported by a threshold definition of 'tall buildings' (6 storeys or 18 metres) to provide greater control over applications for taller, higher density developments proposed in lower to mid-rise areas of the borough, and in the town centre on currently unallocated sites that may come forward.

Housing: final observations

Green Belt sites and failing the 'soundness' test: the draft plan seeks to justify using some Green Belt to meet the EEBC target number, and at times tends to read like a sales proposal for the sites chosen. It makes great play of conforming to NPPF requirements for 'exceptional circumstances', while ignoring that, *in terms of the standard methodology*, the planned housing figure is inadequate and thus the plan is at risk of failing the 'soundness test'. Consequently, the arguments used for allowing 'minor insets' are almost entirely specious, as indeed, is the claimed need to use just this small portion of the Green Belt land. It follows that the draft plan should face a re-write based on a determination as to the **actual housing quantity** that is (a) **desirable** ie the number we can reasonably expect to achieve that **meets**

the expected population growth (assuming the development mix identified and taking the proportion of such need being social and affordable, without using any Green Belt land at all) and (b) **deliverable** in terms of the timescales **provided**.

Feasibility of delivery: the plan fails to discuss, let alone prove, the **feasibility of achieving the target dwellings per annum (dpa) number at the required rate**, even assuming the average historic run-rate as a baseline for the next 18 years is a challenge, since the last 15-year period included the last of the hospital sites build-out on what was Green Belt. We suggest the Society's proposed target of around 206 dpa (p7, above) provides a good basis for the lowest defensible number per annum. It is very close to the LAA assessment of the capacity of the urban area (205). If we plan on using the Green Belt, it will be built out first, leaving the bulk of the opportunity sites languishing, as happened to Plan E for the last 11 years, with only one piece (Lidl and its associated housing) being developed.

Any target number above 206 dpa needs, to avoid accusations of 'aspiration' rather than 'plan', to demonstrate **what is to change in practice** to do better in future than in the recent past. The current draft does this for the 2,175 houses to be built in the green belt (most of which the Society deprecates), but many of the larger LAA sites supporting 3,700 in the existing urban area were included in 2011 in the current Local Plan as mentioned above. The Society questions the **achievability** of this high number. Our response to Q19 refers in part.

Affordable housing: Policy S7 is a commendable attempt to maximise affordable housing and the Society supports it. However, we doubt that it will actually succeed in raising performance and are concerned that its unintended consequence will be to delay indefinitely some sites from being developed. **Delivery of housing that is truly affordable is absolutely vital**. We lack confidence in the policy's capacity to deliver and it does not address the real need which is for **social housing**. The plan seems to conflate the general issue of 'housing affordability' with 'affordable housing' as defined. We would like to see in the evidence base details of actual achievement over the last plan period on affordable housing delivery.

Social housing: the plan seems to be completely silent on social housing provision, in the Society's view, a major omission. Social housing provision needs attention from HMG, who have been responsible for the conspicuous absence of new social housing development since the 1980s. Councils need the means and the will to resume council house building.

New homes and social cohesion: proposals will include high density housing, probably in the form of apartment blocks and should rightly focus on affordability. That doesn't mean quality has to be reduced or short cuts to building standards applied. What is often overlooked however is the need for social cohesion. Management of even award-winning housing complexes can allow decay to set in by withdrawing the security needed by a diverse community. We strongly recommend that the Plan makes binding commitments to ensure policing and caretaking support is maintained and not reduced over time for cost reasons. Marginal loss of Green Belt can be coped with, but the town will lose its attraction if society is allowed to deteriorate.

Climate Change, Sustainable Development and Net Zero / Zero Carbon

The Society welcomes Policy S5, Climate Change Mitigation and Adaptation. Given the climate emergency we are facing, and for the avoidance of doubt, we suggest that the plan should state that Policy S5 has priority over other policies in the draft plan (cf para 4.4). The plan needs to articulate more robustly and in more detail the means by which it will require the delivery of climate mitigation and adaptation measures and support the transition to zero carbon development (not just homes).

The 'Zero-carbon Home' glossary entry is limited and would be strengthened by reference to specific definition(s) and standards. The Society's response to Q9 sets out our views and suggestions in more detail, including developing a supplementary planning document and strengthening the wording and content of Policy S5:

- "new development will be permitted which helps build communities that mitigate the impacts of climate change" should read "**new developments shall demonstrate** how they build communities [...] climate change by:
- **more details**, for example: "All developments (including refurbishment) need to demonstrate how they make effective use of resources and materials, minimize water use and CO2 emissions using a **hierarchy** (be lean: less energy; be clean: efficient; be green: renewable)."

We query why **only homes built on Green Belt** should be net zero, since providing net-zero is actually a better measure for building design, efficiency, and embodied carbon. New developments already have to be designed to greenfield run off rate. A key issue is what will be done to address gradual impermeabilisation of the developments. We support the deployment of a covenant on the sites eg for maximum permeable /impermeable ratios, requirements for native hedging as boundaries between gardens and banning artificial grass (with possible additional relevance to flooding mitigation and biodiversity net gain) and the introduction of a 'greening factor' to assess suitability of development.

Proposed new developments should seek to achieve **water neutrality**: this could include recommending a policy approach with regards to water efficiency standards in new development and setting out principles for an offsetting scheme, which together would allow water neutrality to be met for new developments as a whole within the local authority - for example, developer-led contributions to improve water efficiency measures (leaks and retrofitting existing buildings with water efficient services).

Other issues

There are other issues to comment upon here and in our responses to individual questions.

- **Employment sites** must be kept as such and not diminished. There are 1,900 jobs on the Kiln Land and Longmead industrial sites which are significant drivers of the local economy. Attempts to cram residential dwellings along with industrial and commercial activities onto these sites need to be avoided. Any mixed residential and employment use could only be achieved through a carefully conceived regeneration

strategy which would need to ensure proper separation between any residential areas and noise/disturbance/air pollution issues that can often occur with the type of distribution/warehousing activities prevalent on the existing industrial estates.

- Within Appendix 2 of urban sites not allocated within the plan, but nevertheless accounted for within projected housing numbers, are a number of employment sites and community facilities, eg Toby Carvery, Homebase and Jewsons Builders Yard. **It is important that small employment sites are not dispensed with when they continue to provide a local service.**
- Appendix 2 also lists **Kingswood School** in Stamford Ward as a potential site for 30 new dwellings whereas the school is looking to shortly secure a 15-year lease to maintain its current location and functions. Latest information (7th March 2023) is that a new lease has been agreed.
- **Private schools** are not recognised in the plan. They play a strong part in the borough's the educational provision which must be acknowledged.
- The additional pressure, currently frequently at a maximum, upon **infrastructure**, is not addressed, particularly regarding **road travel**, and needs to be recognised at this stage, including the wider roll-out of charging points for electric vehicles.
- There is a large emphasis on **rail travel** - all the travel logos in the draft plan show trains: this appears restrictive and should indicate the wider situation.
- Inadequate **waste water and sewerage infrastructure** is contributing to the discharge of untreated sewage into the Hogsmill River, a globally rare chalk stream water course. Action is needed under DM12 Pollution and Contamination to address this position which has adverse consequences for the health of both the river and local communities.
- **Space standards** proposed are not acceptable. There should be a sliding scale as there is for parking, according to size of dwelling. Our response to Q21 refers in part.
- The reference to **shopfronts** and preserving the **High Street** is welcome.
- The reference to **trees** and planning is welcome, but again questionable as to whether this will really happen.
- The provision of **visitor parking** is welcome being added to the parking standards schedule.
- The reference and importance about **high quality design** and building better and beautiful is welcomed.
- There should be reference to locating and earmarking a **suitable site for Epsom & Ewell Football Club** for its re-instatement within the borough. A Green Belt location would not be inappropriate.
- The **warding listing needs amending** to reflect the forthcoming (1 May 2023) ward boundaries adjustment and a new ward of Horton being created.
- The general thrust of the document is rather aspirational, heavy on theory and questionable for practice in the real world.

The Society's responses to specific questions start on the next page.

Local Plan Questionnaire

1 Do you support the Vision?

Pdf doc page ref	Pdf para ref	On line para ref
40-41	2.4	Chapter 2, para 3

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

While a Vision, by its very nature, sets out a broad overview, in places this Vision is **impeded by unnecessary 'PR speak'** (eg 'new vibrant communities' in **point 3**, 'reflected and enhanced ...urban qualities', **point 6**), and statements that are vague and broad-brush. We think that there should be **more explicit linkages** between the Vision and the policies in the draft plan to ensure that the Vision is *fully* informed by the policies and vice versa, that the policies are clearly linked to supporting and driving delivery of the Vision. For example, while the reference to 'a network of green spaces' (**point 10**) is welcome, there is nothing in the Vision specifically on Green Belt. Is this deliberate? From a reader's perspective, several points would benefit from the addition of **clearer signposting** to the **policies on infrastructure provision**, eg **points 4,7, 9 and 10**. **Point 2** on housing provision would be strengthened by including **references to affordability and social housing provision**, or at least explicit linkages, to the policies in Chapter 5, 'Homes for All'. Adding a 20mph speed limit to **point 6** (Epsom Town Centre) would identify the **positive contribution a speed reduction would make** to delivering a 'surrounding environment that is even more pleasant'. 'Active travel' referenced in **point 9** should be **added to the glossary** with an appropriate explanation. Reference in **point 11** to 'greater emphasis on design and build quality' is essential. More detail on the borough's 'unique character' would be helpful. While supporting the aspirations in **Point 12**, they are especially vague. What evidence, documentary and otherwise, will be deployed to identify and explain 'the existing character of places'? And likewise with the term 'local distinctiveness' (eg para 7.13).

2 Do you support the Strategic Objectives?

Pdf doc page ref	Pdf para ref	On line para ref
42	2.5	Chapter 2 , para 5

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

It would be helpful to clarify whether these strategic objectives are in order of priority or whether they are all equally important. Suggest emphasising in Objective 1 the importance of affordable and social housing being 'in the right location'. Cross referencing to explicit policies and chapters in the draft document would assist the reader. Neither 'digital' nor Green Belt is mentioned here. Is this deliberate, and if so, is it helpful? What is the justification for these omissions here?

3 Do you agree with the order in which we have prioritised our search for development locations?

Pdf doc page ref	Pdf para ref	On line para ref
52-53	3.22 / Fig1	Chapter 3, para 22

Yes

Please enter any additional comments

Yes, but we query the amount or extent needed, given the reliance on the 2014 dataset for addressing housing need, as discussed earlier in this document sent in our emailed response to this consultation.

4 Do you understand from this diagram what the Local Plan is broadly seeking to achieve by 2040?

Pdf doc page ref	Pdf para ref	On line para ref
54	Fig 3.2	Chapter 3,below para 22

Yes

Please enter any additional comments

Yes, if read in conjunction with the text, albeit Nonsuch Park is in the wrong place on that diagram.

5 Do you support Policy S1 "Spatial Strategy"?

Pdf doc page ref	Pdf para ref	On line para ref
55	3.22	Chapter 3,below para 22

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

Yes, but we query the amount or extent needed, given the reliance on the 2014 dataset for addressing housing need, as discussed earlier in this document sent in our emailed response to this consultation. Choosing the most relevant forward projection on which to base the Local Plan makes a substantial difference as to how much and where to build as regards housing.

6 Do you support Policy S2 "Sustainable and viable development"?

Pdf doc page ref	Pdf para ref	On line para ref
61	3.36	Chapter 3, para 36

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

We suggest adding point c, to paragraph 3 as follows: "c. material considerations of a **local** nature indicate that development should be restricted."

Paragraph 5 should not provide the opportunity to reduce standards and we suggest its deletion. If viability calculations do not add up, then prospective developers should reflect on the wisdom of paying less for the land.

We welcome the published open book requirement where viability of the development is contested by the developer.

7 Do you support Policy S3 "Making efficient use of land"?

Pdf doc page ref	Pdf para ref	On line para ref
65	3.49	Chapter 3, para 49

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

This policy must be linked to a specific policy on limits to building heights to replace Policy DM13, (Building Heights, Development Management Policies Document (2015)). We suggest that 6/7 storeys be the maximum for the town centre with 3/4 storeys elsewhere. These are to eaves level. There may well be a case for allowing mansard/rooms in the roof's construction in addition. The replacement building heights policy should be supported by a threshold definition of 'tall buildings' (6 storeys or 18 metres, and included in the glossary) to provide greater control over applications for taller, higher

density developments proposed in lower to mid-rise areas of the borough, and in the town centre on currently unallocated sites that may come forward.

There are some discrepancies with town centre sites meeting density requirements.

8 Do you support Policy S4 "Development in the Green Belt"?

Pdf doc page ref	Pdf para ref	On line para ref
69	3.57	Chapter 3, para 57

Yes, with some suggested changes detailed below

Other (please specify)

Please let us know what you support, or if anything is missing or needs changing?

Supported in principle but we note this policy will operate *after* Green Belt boundaries have been moved. Paragraph 3.57 proposes what we think is not necessary for SA6, SA8, and SA9. We support allocation of site SA7 (Chantilly Way) for development. This road was constructed in 1990's to facilitate access to the hospital cluster. It cut across the edge of Horton Farm leaving a buffer strip behind the houses in Brettgrave which provided separation from the new road. The residual strip should have been de-classified to become non-Green Belt in past plan reviews but was not. No objection is raised to the SA7 proposal.

For SA5 land at West Park Hospital, this is previously developed land in the Green Belt accommodating **a former hospital building 100 years old. No objection is raised to its redevelopment for housing.**

The remaining three Green Belt site allocations – SA6, SA8, SA9 should not be considered for development and should be removed from the proposals.

Cross-referencing to NPP policies in paragraphs 2 and 3 would add clarity. Avoiding double-negatives in paragraph 3 would also add clarity.

When will Green Belt Study 2 be released (para 3.55)?

Edit needed re 'Limited infilling' (para 3.59, p70).

9 Do you support Policy S5 "Climate Change and Mitigation"?

Pdf doc page ref	Pdf para ref	On line para ref
73	3.63	Chapter 3, para 63

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

The Society welcomes Policy S5, Climate Change Mitigation and Adaptation. Given the climate emergency we are facing, and for the avoidance of doubt, we suggest that the plan should state that Policy S5 has priority over other policies in the draft plan (cf para 4.4). The plan needs to articulate more robustly and in more detail the means by which it will require the delivery of climate mitigation and adaptation measures and support the transition to zero carbon development (not just homes).

No policies seen on where **heat and district heat and power networks** may be implemented (large scale housing developments/ regeneration (SA4).

Need to develop supplementary planning document with further details of the requirements for developers and individual homeowners of the requirements of **climate change mitigation and adaptation on their planning applications.**

Policy S5 states that “new development will be permitted which helps build communities that mitigate the impacts of climate change”. It should read “**new developments shall demonstrate how they build communities [...] climate change by:**

Policy S5 should provide **more details**, for example: “All developments (including refurbishment) need to demonstrate: how they make effective use of resources and materials, minimize water use and CO2 emissions using a **hierarchy** (be lean: less energy; be clean: efficient; be green: renewable).”

Para 3.64: “... Consideration should be given to the need for water conservation through a range of water efficiency measures” – This statement conflicts with policy DM1 Residential Standards where an objective of 110l/cap/day is provided. Consideration is not a good enough term. It should be “Water conservation measures will need to be demonstrated to achieve 110l/cap/day as a minimum and demonstrating how water neutrality can be achieved (in particular for greenfield sites).”

Para 3.66: “The use of renewable energy rather than fossil fuels will help reduce carbon emissions and thus reduce climate change” – what does this mean practically? In view of a potential gas boiler ban for space heating in 2025, a **requirement for electric source space heating should be mandated.** Minimum on site renewable energy generation as a percentage of total development energy use say 20%.

Para 3.67 mentions heat stress and the role green infrastructure could play in reducing it.

Further details for new developments should include, “... demonstrate through an **energy strategy** how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following **cooling hierarchy**:

- 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation, and the provision of green infrastructure
- 2) minimise internal heat generation through energy efficient design (solar shading, building orientation and solar controlled glazing)
- 3) manage heat within the building through internal thermal mass and avoiding single aspect dwellings)
- 4) provide passive ventilation
- 5) provide mechanical ventilation
- 6) provide active cooling systems. “

10 Do you support Site Allocation (SA) 1, Hook Road Car Park and SGN Site?

Pdf doc page ref	Pdf para ref	On line para ref
82-85	4.10-4.18	Chapter 4, paras 10-17

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

Brownfield (640 homes). Density = 640/4.57= 140/ha.

There should be a net zero carbon requirement for dwellings and all other development.

Demotion of the Hook Road car park would need to be synchronised with the new car parking provision in Depot Road.

There must be a cycle path.

Development on the site needs supporting by a specific policy on building heights to replace Policy DM13, (Building Heights, Development Management Policies Document (2015)). We suggest that 6/7 storeys be the *maximum* for the town centre with 3/4 storeys elsewhere. These are to eaves level. There may well be a case for allowing mansard/rooms in the roof's construction in addition. The replacement building heights policy should be supported by a threshold definition of 'tall buildings' (6 storeys or 18 metres and included in the glossary) to provide greater control over applications for taller, higher density developments proposed in lower to mid-rise areas of the borough, and in the town centre on currently unallocated sites that may come forward. We support the indicative lower heights set out in the draft for this site.

11 Do you support Site Allocation (SA) 2, Town Hall, Hope Lodge & Epsom Clinic?

Pdf doc page ref	Pdf para ref	On line para ref
86-89	4.19-4.24	Chapter 4, paras 18-23

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

There should be a net zero carbon requirement for dwellings and all other development.

Concerning the Town Hall buildings, we advocate conversion to avoid adverse carbon consequences of demolition.

Development on the site needs supporting by a specific policy on building heights to replace Policy DM13, (Building Heights, Development Management Policies Document (2015)). We suggest that 6/7 storeys be the *maximum* for the town centre with 3/4 storeys elsewhere. These are to eaves level. There may well be a case for allowing mansard/rooms in the roof's construction in addition. The replacement building heights policy should be supported by a threshold definition of 'tall buildings' (6 storeys or 18 metres, and included in the glossary) to provide greater control over applications for taller, higher density developments proposed in lower to mid-rise areas of the borough, and in the town centre on currently unallocated sites that may come forward. We support the indicative lower heights set out in the draft for this site, given the proximity of Conservation Areas.

We think the site could accommodate more than 90 new homes. Density: $90/1.61=56.25/ha$. Policy S3 for Town Centre is 80 dwellings per ha.

Suggest making it clear that the police and ambulance station sites are included – perhaps by re-labelling from the 'Clinic Site'?

12 Do you support Site Allocation (SA) 3, Depot Road and Upper High Street?

Pdf doc page ref	Pdf para ref	On line para ref
90-93	4.25-4.31	Chapter 4, paras 24-30

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

Brownfield (100 new homes). Density= $100/1.24= 81/ha$.

There should be a net zero carbon requirement for dwellings and all other development.

Development on the site needs supporting by a specific policy on building heights to replace Policy DM13, (Building Heights, Development Management Policies Document (2015)). We suggest that 6/7 storeys be the *maximum* for the town centre with 3/4 storeys elsewhere. These are to eaves level. There may well be a case for allowing mansard/rooms in the roof's construction in addition. The replacement building heights policy should be supported by a threshold definition of 'tall buildings' (6 storeys or 18 metres, and included in the glossary) to provide greater control over applications for taller, higher density developments proposed in lower to mid-rise areas of the borough, and in the town centre on currently unallocated sites that may come forward. We support the indicative lower heights set out in the draft for this site.

Details needed on number of car-parking spaces provided. Synchronisation needed with demolition of Hook Road car park.

There must be improved connectivity for pedestrians from this site into the rest of the town centre, and full connectivity of cycle routes.

13 Do you support Site Allocation (SA) 4, Ashley Centre & Global House?

Pdf doc page ref	Pdf para ref	On line para ref
94-97	4.32-4.38	Chapter 4, paras 31-37

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

Density $70/3.19 = 22/\text{ha}$. This is inconsistent with Policy S3 for Town Centre (80 dwellings per ha).

There should be a net zero carbon requirement for dwellings and all other development.

We have reservations about the final height of 8 storeys. Development on the site needs supporting by a specific policy on building heights to replace Policy DM13, (Building Heights, Development Management Policies Document (2015)). We suggest that 6/7 storeys be the maximum for the town centre with 3/4 storeys elsewhere. These are to eaves level. There may well be a case for allowing mansard/rooms in the roof's construction in addition. The replacement building heights policy should be supported by a threshold definition of 'tall buildings' (6 storeys or 18 metres, and included in the glossary) to provide greater control over applications for taller, higher density developments proposed in lower to mid-rise areas of the borough, and in the town centre on currently unallocated sites that may come forward.

Will Global House be re-furbished or demolished? "The retention re-use and adaptation of existing building stock including the historic environment should be the starting point as a means of achieving sustainable development. Where development is being carried out, the existing building fabric and materials should be re-used where possible."

14 Do you support Site Allocation (SA) 5, Land at West Park Hospital?

Pdf doc page ref	Pdf para ref	On line para ref
98-101	4.39-4.48	Chapter 4, paras 38-47

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

150 dwellings/ $(3.11+1.93) = 30/\text{ha}$.

For SA5 land at West Park Hospital, this is previously developed land in the Green Belt accommodating a former hospital building 100 years old. No objection is raised to its redevelopment for housing. Development has to be tastefully done.

Development on the site needs supporting by a specific policy on building heights to replace Policy DM13, (Building Heights, Development Management Policies Document (2015)). We suggest that 6/7 storeys be the maximum for the town centre with 3/4 storeys elsewhere. These are to eaves level. There may well be a case for allowing mansard/rooms in the roof's construction in addition. The replacement building heights policy should be supported by a threshold definition of 'tall buildings' (6 storeys or 18 metres, and included in the glossary) to provide greater control over applications for taller, higher density developments proposed in lower to mid-rise areas of the borough, and in the town centre on currently unallocated sites that may come forward.

Include linkages with green corridors: only protected trees are mentioned, what about meeting green infrastructure and trees and hedgerow policies?

15 Do you support Site Allocation (SA) 6, Horton Farm?

Pdf doc page ref	Pdf para ref	On line para ref
102-105	4.49-4.57	Chapter 4, paras 48-56

No, with suggestions detailed below

Please let us know what you support, or if anything is missing or needs changing?

Density: $1500/37.89 = 50/\text{ha}$.

We do not support this (currently Green Belt) site allocation – SA6 should not be considered for development and should be removed from the proposals.

If it were retained, then all development should be designed to greenfield runoff rate. Covenants should be put into place for permeability/impermeability ratios for perpetuity (to prevent impermeabilisation of developments through paving/artificial grass). Proximity to SNCI should have specific measures for minimum percentage tree cover, hedges (as a percentage of boundaries), and green infrastructure (green roofs etc). There should be a requirement for access to public transport within a 10m walk from all parts of development and cycle parking standards for developments in support of the concept of 15min city/neighbourhood.

16 Do you support Site Allocation (SA) 7, Land at Chantilly Way?

Pdf doc page ref	Pdf para ref	On line para ref
106-109	4.58-4.66	Chapter 4, paras 57-65

Yes, without changes

Please let us know what you support, or if anything is missing or needs changing?

Density: $(25/0.7) = 35.5/\text{ha}$.

We support allocation of site SA7 (Chantilly Way) for development. This road was constructed in 1990's to facilitate access to the hospital cluster. It cut across the edge of Horton Farm leaving a buffer strip behind the houses in Brettgrave which provided separation from the new road. The residual strip should have been de-classified to become non-Green Belt in past plan reviews but was not. No objection is raised to the SA7 proposal.

Development should be designed to greenfield runoff rate. Covenants should be put into place for permeability/impermeability ratios for perpetuity (to prevent impermeabilisation of developments through paving/artificial grass). Proximity to SNCI should have specific measures for minimum percentage tree cover, hedges (as a percentage of boundaries), and green infrastructure (green roofs etc). There should be a requirement for access to public transport within a 10m walk and cycle parking standards for developments in support of the concept of 15min city/neighbourhood.

17 Do you support Site Allocation (SA) 8, Land adjoining Ewell East Station?

Pdf doc page ref	Pdf para ref	On line para ref
110-113	4.67-4.76	Chapter 4, paras 66-75

No, with suggestions detailed below

Please let us know what you support, or if anything is missing or needs changing?

Density: $350/8.63=40.5/ha$.

We do not support this (currently Green Belt) site allocation – SA8 should not be considered for development and should be removed from the proposals. It sets a precedent for further building after this allocation. There will be loss of playing fields and relocation to Hook Road Arena is too far away. The Green Belt here is performing effectively. Much depends on a significantly improved train service from Ewell East Station. We query road infrastructure capacity and anticipate gridlocked traffic. We note proximity of Priest Hill SNCI and Flood Zone 3.

If it were retained, then all development should be designed to greenfield runoff rate. Covenants should be put into place for permeability/impermeability ratios for perpetuity (to prevent impermeabilisation of developments through paving/artificial grass). Proximity to SNCI should have specific measures for minimum percentage tree cover, hedges (as a percentage of boundaries), and green infrastructure (green roofs etc).

18 Do you support Site Allocation (SA) 9, Hook Road Arena?

Pdf doc page ref	Pdf para ref	On line para ref
114-117	4.77-4.84	Chapter 4, paras 76-83

No, with suggestions detailed below

Please let us know what you support, or if anything is missing or needs changing?

Density $150/14 = 10.7$ (including allowance for sports hub on 9.5ha) $150/4.5=33/ha$. Why not net zero like sites SA5 – SA8?

We do not support this (currently Green Belt) site allocation SA9 should not be considered for development and should be removed from the proposals.

Among many reasons for objecting to this site allocation, we cannot see how an appropriate route for vehicular access to the eastern part of the site can be provided. We consider the basic allocation is too high and can be met from brownfield sites.

19 Do you support Policy S6 "Housing Mix and Type"?

Pdf doc page ref	Pdf para ref	On line para ref
121	5.5	Chapter 5, para 5

Yes, without changes

Please let us know what you support, or if anything is missing or needs changing?

Paragraph 5.3 should include ‘and social’ after ‘affordable’. As referred to in several of our other responses, we have reservations about the housing need projections still being based on the 2014 dataset. Para 5.5 refers to planning for growth in the number of elderly households. The HEDNA reports that local estate agents say there is no demand. This assessment does not mention the death rate in those designated as elderly. Further clarification is needed on numbers. Paragraph 5.40 also refers. The elderly should not be housed in isolation, and we support **Policy 8 para 1d**) in this respect, for example a mix of affordable housing, starter homes, with homes for older people.

The plan would have a stronger narrative if it addressed explicitly the following points:

- (i) whether and to what extent sites SA1-SA9 have been assessed in terms of meeting the proposed HEDNA tenure requirements
- (ii) specifying this assessment for each development in advance, for example, SA8: deliverable by 2031 but SA6 by 2028. If SA6 which is largest site agreed for construction to commence in 2028 how this will feed into site SA8 tenure
- (iii) by what means and to what extent phasing of developments has considered need for infrastructure improvements. (Policy S16).

20 Do you support Policy S7 "Affordable Housing"?

Pdf doc page ref	Pdf para ref	On line para ref
125	5.12	Chapter 5, para 12

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

Affordable homes *and social* homes should be provided on site (our response to Q 19 refers). ‘Well-designed’ should be included in paragraph 5.12.

21 Do you support Policy DM1 "Residential standards"?

Pdf doc page ref	Pdf para ref	On line para ref
133	5.31	Chapter 5, para 31

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

Private outdoor space: (i) clarification is needed on the correlation between the reference to a minimum balcony space of 5sq m to the reference to minimum depth and width of 1500mm in para 5.33. (ii) the proposed minimum of 20sq m garden space for houses is too small. Is this per house or per person? 20sq m is insufficient to accommodate bins, seating, washing line and play area for say, 2.3 or 4 children. Notwithstanding land shortage, living accommodation standards should be maintained.

We support inclusion of the Future Homes Standard and a **water efficiency** standard. However: “building achieves a policy standard of 110l/cap/day – (Part G Building Regs)- unless not technically feasible or unviable “ is **not a high enough standard**. As an *absolute minimum* the building regulation standard should be observed (110l/cap/day) there should be **no get-out clause** such as not viable or technically feasible- installing a low flush toilet is not technically challenging.

Proposed new developments should seek to achieve **water neutrality**: this could include recommending a policy approach with regards to water efficiency standards in new development and setting out principles for an offsetting scheme, which together would allow water neutrality to be met

for new developments as a whole within the local authority. For example, developer-led contributions to improve water efficiency measures (leaks and retrofitting existing buildings with water efficient services).

At a development level, expectations would be for water efficient design eg low flush toilets, rainwater harvesting (would also reduce runoff) and greywater recycling.

Overheating: single-aspect dwellings are more difficult to ventilate naturally and are more likely to overheat and should be avoided in There are a number of low-energy measures that can mitigate overheating risk. These include solar shading, building orientation and solar-controlled glazing.

The Chartered Institution of Building Services Engineers (CIBSE) has produced guidance on assessing and mitigating overheating risk in new developments and it can also be applied to refurbishment projects, eg for Global House. Supplementary Documents for the application of a heating /natural ventilation/design of buildings combined with green infrastructure should be developed.

We would like to see specific reference to a net zero carbon standard. This in our view is a major omission.

Policy DM e): We would like to see the requirement for affordable / adaptable homes be applied also to sites with fewer than 10 dwellings. This would be a much-needed improvement in this already most densely populated local authority in Surrey.

We would like to see 'well-designed' included in para 5.31.

P144 explains the Use Classes referred to re Policy DM2. Explanation on pp133, 140 would also be helpful re Policy DM1.

22 Do you support Policy S8 "Specialist Housing"?

Pdf doc page ref	Pdf para ref	On line para ref
139	5.40	Chapter 5, para 40

Yes, without changes

Please let us know what you support, or if anything is missing or needs changing?

Para 5.5 refers to planning for growth in the number of elderly households. The HEDNA reports that local estate agents say there is no demand. This assessment does not mention the death rate in those designated as elderly. Further clarification is needed on numbers. Paragraph 5.40 also refers. **The elderly should not be housed in isolation, and we support Policy 8 para 1d)** in this respect, for example a mix of affordable housing, starter homes, with homes for older people. Specialist schemes for the elderly and others **must be consistent with Policy S6, Housing Mix and Type.** The Society does *not* support specialist high rise, high-density schemes for the elderly that ignore requirements for a mix of tenure, type and size of dwelling and fail to have regard to the size, characteristics, and location of the site, recent examples being the schemes proposed for the former Organ Inn site, and for the former Epsom Hospital (the latter by Legal and General / Guild Living).

23 Do you support Policy DM2 "Loss of Housing"?

Pdf doc page ref	Pdf para ref	On line para ref
143	5.47	Chapter 5, para 47

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

Clarification is needed about whether paragraphs a) – d) are intended to be read conjunctively or disjunctively. Replacement of existing housing must be compatible with the existing townscape in terms of character and external design. We suggest the inclusion of a supporting statement acknowledging the carbon cost of demolition and rebuilding, and the preference for retrofitting.

Para5.51: we are pleased to note the acknowledgment of the importance of social and community facilities here, in contrast to the situation at The Wells some years ago where a much smaller and considerably inferior community centre and more homes were proposed (fortunately not built). That situation should be guarded against in the Local Plan.

24 Do you support Policy S9 "Gypsies, Travellers and Travelling Showpeople?"

Pdf doc page ref	Pdf para ref	On line para ref
147	5.56	Chapter 5, para 56

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

We support Policy S9, subject to agreement as a standalone development on SA6 (Horton Farm). We assume that the Council has consulted the liaison officer for the Gypsy and Traveller community.

25 Do you support Policy S10 "Retail Hierarchy and Network"?

Pdf doc page ref	Pdf para ref	On line para ref
157	6.4	Chapter 6, para 4

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

We support the policy but query its robustness and would like to see more detail on implementation, including an acknowledgment of the value of heritage in promoting the attractiveness of the area for retail uses. We note that two of the three businesses in the image on p154 have closed, likewise for the image on p164.

26 Do you support Policy DM3 "Primary Shopping Areas and Retail Frontages"?

Pdf doc page ref	Pdf para ref	On line para ref
163	6.11	Chapter 6, para 11

Yes, without changes

Please let us know what you support, or if anything is missing or needs changing?

We suggest changing the image on P164, since that business has closed.

27 Do you support Policy DM4 Edge of Centre or Out of Centre Proposals?

Pdf doc page ref	Pdf para ref	On line para ref
167	6.17	Chapter 6, para17

Yes, without changes

Please let us know what you support, or if anything is missing or needs changing?

Suggest changing the image on p166 to an image from the borough. We would like to know how these proposals relate to proposals to redevelop the utilities site (SA1) and land adjoining Ewell East Station (SA8).

28 Do you support Policy DM5 "Neighbourhood Parades and Isolated Shops"?

Pdf doc page ref	Pdf para ref	On line para ref
173	6.26	Chapter 6, para 26

Yes, without changes

Please let us know what you support, or if anything is missing or needs changing?

This helps to promote the 15-minute city /neighbourhood, and encourages active travel.

29 Do you support Policy S11 "Economic Development"?

Pdf doc page ref	Pdf para ref	On line para ref
179	6.36	Chapter 6, para 36

Yes, without changes

Please let us know what you support, or if anything is missing or needs changing?

We support retention and encouragement of strategic employment sites which are significant drivers of the local economy. Attempts to cram residential dwellings along with industrial and commercial activities onto these sites need to be avoided. Any mixed residential and employment use could only be achieved through a carefully conceived regeneration strategy which would need to ensure proper separation between any residential areas and noise/disturbance/air pollution issues that can often occur with the type of distribution/warehousing activities prevalent on the existing industrial estates.

Explanation of 'Classes B2, B8 and E(g)' (Use Classes Order) would be helpful. 'Sui Generis' is in the glossary but not the others. Explanation in the main text would be more helpful, see eg P144 where the Use Classes there are explained. Explanation would be helpful re Policy DM1 (pp133, 140).

30 Do you support Policy DM6 "Equestrian and Horse Racing Facilities"?

Pdf doc page ref	Pdf para ref	On line para ref
187	6.46	Chapter 6, para 46

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

Riding for the Disabled is a valuable resource. We strongly recommend that the RDA's importance, including the preservation of its site and facilities be recognised in this section, in DM 6 paragraph 3) and in para 6.46. This would necessitate changes to the map.

31 Do you support Policy DM7 "Visitor Accommodation"?

Pdf doc page ref	Pdf para ref	On line para ref
193	6.54	Chapter 6, para 54

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

We suggest considering allocating space for a touring caravans holiday park, that would offer well-managed recreational use, limited to 21 days' stay.

32 Do you support Policy S12 "Design"?

Pdf doc page ref	Pdf para ref	On line para ref
199	7.5	Chapter 7, para 5

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

Buildings heights should be governed by an overall heights policy. Policy S12 needs supporting by a specific policy on building heights to replace Policy DM13, (Building Heights, Development Management Policies Document (2015)). We suggest that 6/7 storeys be the *maximum* for the town centre with 3/4 storeys elsewhere. These are to eaves level. There may well be a case for allowing mansard/rooms in the roof's construction in addition. The replacement building heights policy should be supported by a threshold definition of 'tall buildings' (6 storeys or 18 metres and included in the glossary (cf Policy D9 in the London Plan (2021)) to provide greater control over applications for taller, higher density developments proposed in lower to mid-rise areas of the borough, and in the town centre on currently unallocated sites that may come forward. We support the indicative lower heights set out in the draft plan's site allocations. **We think that Policy S12, without more, is not strong enough to withstand applications for tall towers as happening elsewhere in Surrey, for example, in Redhill and Woking and in outer London boroughs, for example Croydon, Kingston and Sutton, and which we anticipate will be fiercely resisted here.** Experience has shown that developers' proposals can be at odds with what local communities consider appropriate in terms of height, massing and overall appearance, recent examples being the Guild Living / Legal and General proposals for part of the (former) Epsom Hospital site, the original proposals for redevelopment of 24-28 West Street, and tower block proposal for Station Approach, Stoneleigh. In the Society's view the de facto downgrading of Policy DM13 (DMPD 2015) contributed significantly to these unacceptably high-rise proposals coming forward, hence our suggestion that must be discouraged in future by a replacement buildings height policy in the new Local Plan.

Supplementary planning documents / design codes / design briefs are needed to capture the borough's local vernacular and distinctiveness and provide more detailed design guidance for specific locations. Para 7.7 should read, 'the Council will...' and not 'The Council may...'. The current wording is too weak. Well-designed development and well-designed places are about much more than building heights. Nonetheless a height guidance policy is urgently needed, as a minimum, as this aspect of the development is often the most controversial.

Para7.5 needs to **specify links to other relevant policies** that will inform the design of new development. Why are net zero homes for residential developments not mentioned here? There is inconsistency with some SA1-SA9 sites mentioning net zero while others do not. This must surely be a clear policy without differentiation. Likewise, why are only non-residential developments required to meet BREEAM Excellent? The NPPF, para 127, requires plans to 'set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.' In the Society's view, the draft Local Plan is insufficiently detailed and robust in this respect.

33 Do you support Policy S13, Protecting the Historic Environment?

Pdf doc page ref	Pdf para ref	On line para ref
203	7.9	Chapter 7, para 9

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

There should be explicit support for stronger protection for locally listed buildings.

Edit needed on p203 where 'S2' needs changing to S13.

We would like to have details about the nature and extent of the council's support for neighbourhood plans and conservation area appraisals, together with the prospects for designation of new conservation areas.

34 Do you support Policy DM8 "Heritage Assets?"

Pdf doc page ref	Pdf para ref	On line para ref
207-209	7.18	Chapter 7, para 19

Yes, without changes

Please let us know what you support, or if anything is missing or needs changing?

Pleased to note para 7.16: despite reporting on several occasions, the Grade II listed barn, Axwood, is being reclaimed by nature; and The Durdans' clunch wall is in places crumbling.

Edits needed in introduction on p206, and to para 7.15.

35 Do you support Policy DM9 "Shopfronts and Signage"?

Pdf doc page ref	Pdf para ref	On line para ref
217-218	7.45	Chapter 7, para 45

Yes, without changes

Please let us know what you support, or if anything is missing or needs changing?

36 Do you support Policy DM10, "Landscape Character"?

Pdf doc page ref	Pdf para ref	On line para ref
223	7.57	Chapter 7, para 57

Yes, without changes

Please let us know what you support, or if anything is missing or needs changing?

37 Do you support Policy S14: "Biodiversity"?

Pdf doc page ref	Pdf para ref	On line para ref
227	7.64	Chapter 7, para 64

Yes, without changes

Please let us know what you support, or if anything is missing or needs changing?

Developments located next to SNCI, Irreplaceable habitats or SSSI/NNR should consider the potential impact of indirect effects to the site, such as noise, shading or lighting (SA6, SA8).

Biodiversity corridors between SNCI/SSCI and other parks and green spaces within the borough must be protected by a **clear policy on green spaces**. The reference to 'other sites' in para 7.62 should be amended to include specific reference to, among other things, parks, fields, woodlands and gardens. Allotment sites should be included and protected as valuable contributors to biodiversity sites/green corridors. The current focus of policy S14 on designated sites demonstrates **the need for a dedicated policy for the protection of green spaces**. The need is reinforced by the proposed 'insetting' of sites

from the Green Belt and the increasing development pressures on the borough. It is also supported by the NPPF, para 101, which advocates the designation of Local Green Spaces through the local plan process and in circumstances where such areas ‘hold a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife.’ Our response to Q42 also refers.

Policy S14 Para1) b) refers to ‘priority’ species. We suggest this is changed to ‘protected’ species, consistent with the glossary entry and relevant legislation.

38 Do you support Policy DM11, "Trees, Woodlands and Hedgerows"?

Pdf doc page ref	Pdf para ref	On line para ref
231	7.74	Chapter 7, para 74

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

The title of the policy DM11 is somewhat misleading: while hedgerows are referenced in para 1) a), they are not referenced in the details on implementation, where only veteran trees, trees with TPO’s and trees within conservation areas are discussed. Specific guidance should be provided for hedgerows both in terms of preventing hedgerow loss and the need to create new hedgerows. Planting of native species hedgerows should be policy as part of boundaries for new housing. The emerging Epsom and Ewell Tree Management Plan should provide guidance on required species for both trees and hedgerows.

The Planting of additional trees should generally be included in developments-particularly large-canopied species which provide wider range of benefits because of their larger surface area and their canopy.

“Applicants must work with highways officers and tree officers to ensure that.... trees are compatible with highway standards... “(para 7.78). This statement will invariably lead to incompatibility of trees next to any highway or road. **A hierarchy system would be preferred on the basis that tree-lined streets are required and the benefits highlighted in terms of climate change mitigation and adaptation.**

When trees are removed compensation required in terms of substitution planting to replace services lost should be based on a recognized tree valuation method such as CAVAT or i-Tree Eco. CAVAT: Capital Asset Value for Amenity Trees- provides a basis for managing trees in the UK as public assets rather than liabilities. It is designed not only to be a strategic tool and aid to decision making but also to be applicable to individual cases where the value of a single tree needs to be expressed in monetary terms.

39 Do you support Policy S15 "Flood Risk and Sustainable Drainage"?

Pdf doc page ref	Pdf para ref	On line para ref
237	7.84	Chapter 7, para 84

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

Sustainable drainage measures are of particular importance in areas with sewer capacity limitations. Infrastructure investment *in advance* of the developments taking place is important (Infrastructure Plan: Baseline Assessment (January 2023) – note that this document needs paginating).

The incremental impacts and **cumulative demands on infrastructure** of minor development should be addressed in the borough's infrastructure delivery plans or programmes.

Runoff should be managed as close to source as possible.

Key supporting document should include Epsom and Ewell Green infrastructure Study (2013 or updated study).

Editorial change need in S15 para 3: 'Development must be located away from **land** at risk from...'

40 Do you support Policy DM12 "Pollution and Contamination"

Pdf doc page ref	Pdf para ref	On line para ref
241-243	7.94	Chapter 7, para 94

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

There are existing and ongoing problems with sewage spillages / discharges into the Hogsmill river. Inadequate waste water and sewerage infrastructure is contributing to the discharge of untreated sewage into the Hogsmill River, a globally rare chalk stream water course. Action is needed under DM12 Pollution and Contamination to address this position which has adverse consequences for the health of both the river and local communities.

There should be some follow-up on para 7.93. What has happened since the AQMA declaration, and how has its effectiveness been measured?

Water quality: link to ground water pollution sources.

Light: what is defined as an 'unacceptable impact' on biodiversity?

41 Do you support Policy S16: Infrastructure Delivery?

Pdf doc page ref	Pdf para ref	On line para ref
251	8.4	Chapter 8, para 5

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

This is rather broad-brush. The policy needs to address the cumulative impact of development on small sites. Regarding the town centre major development sites, infrastructure needs to be more site specific. Local walking and cycling infrastructure plans need to come before the Local Plan to inform the local plan and not vice versa.

42 Do you support Policy S17 - Green Infrastructure?

Pdf doc page ref	Pdf para ref	On line para ref
255	8.12	Chapter 8, para 12

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

Policy details on implementation are vague. Words like "encouraged" and "consider" measures to mitigate or offset generally fail to materialize in any meaningful way.

We strongly recommend the Local Plan includes a policy to specifically ensure the safeguarding of valuable local green amenity sites, given the increasing development pressures on the borough, the benefits to health and well-being of green spaces, and the importance of protecting biodiversity and avoiding further biodiversity loss. Designation of appropriate sites would be consistent with and take forward the recognition of locally important and valued open areas and green spaces acknowledged as key distinguishing features in the Core Strategy (2007) and elsewhere. It is also supported by NPPE, para 101. Our response to Q37 also refers.

The emerging Epsom and Ewell Green infrastructure Study 2013 (query date) states “Domestic back gardens should be incorporated into the Borough’s GI strategy. All domestic garden land within the Borough would need to be part of the strategy, but specific strategically important areas could be highlighted, and the Council could seek to protect these from inappropriate development, possibly through Article 4 Directions.” Could provision against impermeabilisation of back gardens be sought using Article 4 directions?

The Key supporting document listed as part of the draft Local Plan, ‘Emerging Epsom and Ewell Green Infrastructure Study 2013’ is inconsistent with the same draft local plan proposal. The 2013 study states that, “the protection of Green Belt land within the Borough continues into the future “

Set covenants for all new large-scale developments:

- Housing boundaries constituted of native hedging (can’t be removed)
- Fixed permeability/impermeability ratios (to prevent gradual loss through impermeabilisation)
- Banning of use of artificial grass or synthetic materials.
- Roofs either green roofs or used for on-site energy generation.

The glossary entry needs to include ‘on-site’ green infrastructure provision, linked to specific site allocations.

43 Do you support Policy DM13, "Community and Cultural Facilities"?

Pdf doc page ref	Pdf para ref	On line para ref
259	8.18	Chapter 8, para 18

Yes, without changes

Please let us know what you support, or if anything is missing or needs changing?

44 Do you support Policy DM14, "Education Infrastructure"?

Pdf doc page ref	Pdf para ref	On line para ref
263	8.26	Chapter 8, para 26

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

This is very general, with prospects for detailed development over time. The justification needs to acknowledge the importance and extent of private education provision in the borough and consider the need for and impact of pre-school provision.

45 Do you support Policy DM15: "Open Space, Sport and Recreation"?

Pdf doc page ref	Pdf para ref	On line para ref
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267	8.31	Chapter 8, para 31
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Yes, without changes

Please let us know what you support, or if anything is missing or needs changing?

We would like to see the base for Epsom and Ewell Football Team back in the borough.

46 Do you support Policy S18 "Transport"?

Pdf doc page ref	Pdf para ref	On line para ref
271	8.39	Chapter 8, para unnumbered following para 38

Yes, with some suggested changes detailed below

Please let us know what you support, or if anything is missing or needs changing?

Local walking and cycling infrastructure plans need to come before the Local Plan to inform the local plan and not vice versa. Paragraph 8.45 mentions LCWIP to be used as a basis for identifying local plans. Under Surrey County Council's Climate Strategy, Strategic Policy 2, Invest in infrastructure to increase the uptake of walking, and cycling and public transport, EEBC should have developed the LCWIP by 2022. The LCWIP should inform the local plan and developments rather than the other way.

There is no mention of minimum standards for measures to encourage a greater uptake of cycling and walking, such cycle parking or cycle and pedestrian routes. Guidance should be developed, with minimum standards for a range of settings, residential, commercial, leisure facilities, parks and green spaces. Pedestrian routes linking the existing roads should be designed so that they are quicker than using the car through traffic filters, bridleways etc.

CIL funding could go towards meeting these standards within the Borough where they do not yet comply.

Any new developments should be within a 10m walk of public transport.

Consideration should be given to the 15 min city concept so that essential amenities (doctor's surgery, school, shops are easily accessible by foot or cycling within 15 min).

We support the roll-out of car clubs.

47 Do you support Policy DM16: "Digital Infrastructure and Communications"?

Pdf doc page ref	Pdf para ref	On line para ref
277	8.50	Chapter 8, para 50

Yes, without changes

Please let us know what you support, or if anything is missing or needs changing?

48 Are there any other comments you wish to make about this draft Local Plan or the Sustainability Appraisal?

Pdf doc page ref	Pdf para ref	On line para ref
1-311		

Presentation: clear layout and good use of colour coding. Error in key diagram re location of Nonsuch Park. No question mark is needed at the end of the following sentence: *‘Please let us know what you support, or if anything is missing or needs changing?’* Let’s avoid the moronic interrogative.

Glossary: suggest adding ‘Active Travel’, ‘Social Housing’ (as distinct from ‘affordable’ housing, but cross-referenced to it), ‘HCA’ (see p62) and ‘Green Space’ (if a dedicated green space policy is added).

For consultation purposes, examples of what the densities per hectare referred to in the plan could look like. This could be referenced to existing developments in the borough.

49 Do you support the content of the marketing requirements for Change of Use Applications detailed in Appendix 4?

Pdf doc page ref	Pdf para ref	On line para ref
296-301	4	4

Yes, without changes

Please enter any additional comments

50 Appendix 5 – Do you support the Parking Standards detailed in Appendix 5

Pdf doc page ref	Pdf para ref	On line para ref
304-309	4	4

Yes, with some suggested changes detailed below

Please enter any additional comments

We agree that there are likely to be situations where less parking than the minimum standards are appropriate, specifically in town centre locations. However, we have concerns about ensuring access for wheelchair users and other individuals with limited mobility or other special needs. We agree with the recognition that it is important for new developments to provide adequate parking so as not to displace more cars onto roads with consequent increases in congestion.