

REF	NAME	ORGANISATION	SECTION	SUMMARY	RESPONSE TO COMMENT	RECOMMENDATION
1	Mr B Jolly	(Chartered Surveyor)	General. Affordable Housing	Concern that the affordable housing tariff is likely to reduce the number of new houses being built due to creating lower land values (by up to 20% and 40% where 20% and 40% affordable housing contributions are required). The value of land for development needs to be materially higher than the existing use value, otherwise the sites will not come forward for development, particularly small sites. Theoretical model included to illustrate this point.	Affordable housing thresholds have already been determined in policy in the Core Strategy. The SPD allows for an 'open book' approach to ensure that development is not made unviable. Our housing trajectories show that we are currently delivering above our annual housing target and we shall monitor the situation carefully.	No change
1	Mr B Jolly	(Chartered Surveyor)	General. Infrastructure Tariffs	Should be clear and transparent so that developers can take them fully into account.	Agreed. This is the purpose of the SPD.	No change
1	Mr B Jolly	(Chartered Surveyor)	General	Will reduce land values for development as house builder will have to reduce his offer to existing landowner	Agree that this is a likely outcome. One of the purposes of the SPD is to ensure that there is clarity and consistency in infrastructure provision and so that likely charges can be factored in to land negotiations at an early stage.	No change
1	Mr B Jolly	(Chartered Surveyor)	General	Increasing energy efficiency requirements already cost builders up to £10,000 per new dwelling with a consequence of a reduction in land value.	This impact will lessen over time as the market develops. These matters can be taken into account in the open book viability check if required.	No change
1	Mr B Jolly	(Chartered Surveyor)	General	Unfortunate time to be introducing these tariffs/charges. If house prices remain stable but construction costs continue to increase as a result in an inflation in labour, energy and materials, land values will fall. This will have the effect of choking off the supply of new housing sites.	It is likely that the effect of the SPD when published may be to reduce land values. The impact of the document can be monitored and the impact of the tariffs reviewed as required. The Council can respond to significant changes by proposing amendments to the document as required.	No change
1	Mr B Jolly	(Chartered Surveyor)	Part 1, para 3	There is an 'anti-development' bias in this draft document which weakens the document and should be removed.	This is not accepted. Development provides economic and social benefits and the Council's Core Strategy policies (on which this SPD is based) reflect this position. Provision for new development is made in line with regional and local requirements. This SPD seeks to ensure that the necessary infrastructure generated by demands arising from the development can be put in place.	No change
1	Mr B Jolly	(Chartered Surveyor)	Part 1, paras 5 and 6	To determine whether a development is 'acceptable in planning terms' can only refer to planning docs (in the LDF) so need to delete references to Community Strategy and Corporate Plan as this leaves the Council open to legal challenge.	Noted. However these references are statements of fact. The Council's LDF will help deliver the physical and spatial aspects of the Community Strategy, and will help support the Council's Corporate Plan. This is in accord with Government policy and guidance.	Part 1, para 6.3 & 6.4 amended
1	Mr B Jolly	(Chartered Surveyor)	Part 1, para 8	CS12 conflicts with para 8 as para 8 states that 'developer contributions are a necessary cost of development'	The Core Strategy policy contains a wider definition of when a contribution will be required to the one stated in the representation.	No change
1	Mr B Jolly	(Chartered Surveyor)	Part 1, para 8	The infrastructure tariff assumes that all of the existing infrastructure and services referred to in para 8.11 are at full capacity- if developer can prove they are not, it will be open for the developer to challenge the whole nature of the tariff by referring to the Core Strategy	The SPD addresses the incremental impact on infrastructure resulting from numerous small scale developments and does not assume that all existing infrastructure is at capacity. Policy CS12 refers to development which creates "...the need to provide additional or improved community facilities and infrastructure, or would exacerbate the existing deficiency in their provision..." It would be difficult to identify a 'tipping point' for some of the tariffs and it is fairer if all developments are treated equally. The Council will seek to apply the tariffs in a consistent way, but without adopting a blanket approach. Circular 05/05 B22 states 'in some cases, individual developments will have some impact but not sufficient to justify the need for a discrete piece of infrastructure'. Local planning authorities may therefore seek contributions for future provision.	No change
1	Mr B Jolly	(Chartered Surveyor)	Part 1, para 8	Para 8.9 suggests a biased assumption that development has a negative impact.	This is not intended to be the case. The point being made is that is that the impact increases in resident population / workers have on community infrastructure should be mitigated.	No change

1	Mr B Jolly	(Chartered Surveyor)	Part 1, para 8	Not all development increases the resident population e.g. new occupiers arising from a marital split or a young person previously living at home.	In specific cases, and for a limited period of time, these circumstances may arise. However the SPD, and the Core Strategy on which its based, has to take a broader and more collective view of population change over the Borough, and over a much longer period of time. Any individual site circumstances would be specific and difficult to measure. It would not be possible to establish a fair and consistent means of dealing with these forms of application. The SPD suggests a discount for what was previously existing on site.	No change
2	Mr G Irvin	Showman's Guild	General. Infrastructure contributions	Should look to developers to allocate land & resources to provide new, quality sites for gypsies, travellers, and showmen.	This issue is not related to the matters covered in the SPD. It will however be dealt with in the forthcoming Development Control Policies and Site Allocations DPD as set out in Policy CS10 of the Core Strategy	No change
3	Cllr C J Frost	County Councillor	Part 1, para 8.11	Would like to see support for the Playhouse here	The Playhouse is included in the Community Facilities section of the document - Part 3, para 8.2	No change
3	Cllr C J Frost	County Councillor	Part 2, para 5.4	Should include that the provision of affordable housing should not change the character of an area	This issue is covered in Part 2, para 9.1 and will also be dealt with in more detail in forthcoming LDF documents	No change
3	Cllr C J Frost	County Councillor	Appendix G	The definition of ETC should include more of the roads to the North of the station, or not residential area to the SE	The SPD uses the existing definition of the town centre as defined on the Proposals Map accompanying the adopted (and saved) Local Plan 2000. The Epsom Town Centre boundary will be reviewed and re-defined in light of the Site Allocations DPD.	No change
4	Mr P Grant	Crime Reduction Advisor / Architectural Liaison, Surrey Police	General	Could there be contributions for crime reduction/ designing out crime?	This will be considered when the document is reviewed after two years of operation. The subject of 'designing out crime' will be visited as part of the forthcoming SPD on design guidance. However, the SPD does not preclude contributions being made for these forms of improvement and it is now stated in the document that the tariffs do not cover all the types of contribution which may be required from a development. Additionally, contributions towards improving the environment of the public realm may be used towards CCTV.	Reference to contributions to other types of infrastructure made in Part 1, para 7.3.
5	Mr G Coll	Sport England	Part 3, para 6.4	A sound basis on the open space assessment	Noted	No change
5	Mr G Coll	Sport England	Part 3, para 6.10	Differentiation of contributions by types of open space, enable a measured response to local need	Noted	No change
5	Mr G Coll	Sport England	Part 3, para 6.7	Recognition of importance of open space and for future maintenance and management	Noted	No change
5	Mr G Coll	Sport England	Part 3, para 6.11	How are 'local needs & priorities' to be decided? Make reference to evidence from open space audit & could specify opportunities for some monies to be put into a fund for wider improvements that will benefit residents across the Borough	The Council will assess needs in relation to each relevant development. It will have regard to its Open Space audit (2006) and any other relevant information or evidence available at the time the application is submitted. This is referred to in Policy CS4 in the Core Strategy.	Part 1, 9.11 to 9.13 revised to clarify the monitoring and management of planning obligations
5	Mr G Coll	Sport England	Part 3	Need to pay more attention to indoor sports facilities	At present there is no specific proposal for indoor facilities although the demand has been recognized in the Open Space and Recreation Study. There is a current proposal to improve Court Recreation Ground, which will contain some small scale indoor facilities (changing rooms); this will be covered by the contribution to outdoor facilities. The Council will keep its programme of schemes under review and indoor facilities may be added if the need warrants it.	No change
5	Mr G Coll	Sport England	Part 3	Make reference to the Boroughs leisure strategy	Noted	Reference made in Part 3, para 6.4
5	Mr G Coll	Sport England	Part 3, General	Refer to www.sportengland.org >get resources>planningforsport>planning contributions for guidance	Noted; this has been done in the preparation of the SPD	No change
5	Mr G Coll	Sport England	General	Could include a flow chart summarising the protocol for development (see Fareham BC)	Noted. This may be added as part of the review	No change
5	Mr G Coll	Sport England	Part 3, General	Could add local open space standard info to appendix	The Council's Open Space Study has been referred to and is available on the Council's website.	Reference made in Part 3, para 6.4
5	Mr G Coll	Sport England	General	Specify where planning contributions might be spent and specific exclusions	The spending of the contributions will be determined by the Councils in accordance with the requirements of Circular 05/05. Monies will be ring fenced and spent in accordance with the Circular and the individual agreements. Schemes will be identified through an established protocol with Surrey County Council and through the Council's own internal processes.	Part 1, 9.11 to 9.13 revised to clarify the monitoring and management of planning obligations

5	Mr G Coll	Sport England	General	Include reference to monitoring	Monitoring is referred to specifically in Part 1, para 9.12	Part 1, 9.11 to 9.13 revised to clarify the monitoring and management of planning obligations
6	Ms A Francis	Natural England	General	Support production of this document	Noted	No change
6	Ms A Francis	Natural England	General	Recommend the production of a specific technical guidance sheet on multi-functional green infrastructure in the future.	This will be considered at an appropriate point at a future date, but is not required for this SPD.	No change
7	Ms G Cook	Thames Water Property Services Ltd	General	It is important to consider PPS12 para 4.9 and para B3, and the need to take account of infrastructure provisions and facilities on all new developments.	Noted	No change
7	Ms G Cook	Thames Water Property Services Ltd		The SPD has relatively little relevance to Thames Water as the infrastructure is funded in a different way.	Noted	No change
7	Ms G Cook	Thames Water Property Services Ltd		It is essential that water and wastewater infrastructure is in place ahead of development, and that this is given adequate policy support in the future.	Noted	No change
8	Mr E Kemsley	Peacock and Smith on behalf of Morrison Supermarkets PLC	General	New retail facilities or extensions should not contribute to: Libraries/ Community facilities/ parks & gardens/ outdoor sports facilities as this is considered unreasonable and unlikely to directly relate to the development. Any contributions required should satisfy circular 05/05 by being: 1) Relevant to planning 2) necessary to make the proposed development acceptable in planning terms 3) Directly related to the proposed development 4) Fairly & reasonably related in scale & kind to the development proposed 5) Reasonable in all other respects.	The reference to Circular 05/05 is accepted and these requirements have been recognised in the SPD. Additional workers created by development may use the facilities mentioned, although some to a lesser degree. It is accepted that in respect of library facilities and community facilities the commercial contribution can be reduced/removed.	Document amended to reflect comment.
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Affordable Housing. Part1, para 8.2	Reject to 'open book' approach to finances. It is not the LPA's role to determine acceptable levels of costs and profit. This has the risk of eliminating certain developers, and resulting in a knock on effect of a very limited range of development types occurring.	Not accepted. The 'open book' approach is an important component of the SPD. It is not required in every case, but only those where the developer feels the requirements would render the development unviable. In these circumstances the developer has an opportunity to explain the particular site/development circumstances.	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Affordable housing, Part 1, para 8.3	Object. Lack of experience and expertise in LPA to carry out assessments	It is recognised that the receipt of development appraisals may require the Council to obtain independent professional advice. In these cases the Council will call on its retained consultants to advise on the developer submissions.	Part 1, para 8.3 slightly amended
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Affordable housing, Part 1, para 8.4	Disagree- non-standard flood prevention & demolitions are abnormal costs	Not accepted as a general statement. Should there be exceptional non-standard costs these can be brought to the LPA's attention through the development viability statement. Foundations, demolitions and flood prevention measures are considered normal costs when developing the sort of sites likely to come forward in Epsom and Ewell.	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Affordable housing, Part 1, para 9.11	Object to 5% admin charges- The developer should not be financially responsible for what the Council should already be capable of.	Circular 05/05 states that it is for LPAs to decide which matters to address through standard charges and formulae (B33). The intention is that the money will be used to fund officer time to specifically to track, manage and review progress with legal agreements and developer contributions. This is in line with practice elsewhere. This approach will help ensure transparency in the process and support the objective of achieving full accountability in the spending of monies received. The charge will also be used to develop and refresh spending programmes and update and amend the figures. These tasks are not currently undertaken by the Council and the number of developer contributions will increase, thereby demanding more Council resources.	No change

9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Part 2, para 1.5	Object in the strongest terms to the requirement for sheltered and specialist housing to provide affordable housing on site. It has been demonstrated at appeal that in circumstances it is inappropriate	PPS3 seeks mixed and balanced communities. It is accepted that there have been individual cases where it has been accepted that the provision of an affordable sheltered housing element within a private sheltered housing building would not be appropriate for management and maintenance reasons. However this is not the same as saying that it would be impossible to make any on site provision of affordable housing, which need not be in sheltered units. So there is no reason why affordable housing and sheltered housing cannot be provided within the same development. In addition a number of mixed tenure Extra Care schemes have been developed by RSLs with elements of social rented and shared ownership (this means the residents part rent/ part own their own homes) accommodation on site. Schemes like this are working successfully and have overcome the potential issues of service charges and shared communal areas. It is possible that these principles could also apply to private developments. The important requirement is that developers need to have considered the requirement to provide affordable hou	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Part 2, para 2.3	This SPD should have been informed by the Strategic Housing Market Assessment & is premature	Noted but not agreed. Work on the draft SHMA proceeded in parallel with work on the draft SPD. It suggests Epsom and Ewell requires more 1 bedroom and 4 bedroom units as a priority and that there is a shortage of affordable family sized accommodation. This confirms what has already been presented in the draft SPD. It would be unrealistic to have delayed work on this important programmed SPD to await the publication of the final SHMA document.	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Part 2, para 2.6	The no of people on the housing register is not a true reflection of housing need, as people who are not in housing need are able to register.	The housing register, as the SPD states in para 8.2, is one of three sources considered by the Council when informing developers of the size and type of affordable housing currently required. Details of applicants and their required bedroom sizes are used by central government to inform policy decisions and whilst it is true that applicants can make an application to any register across the UK, the Council ensures that anyone making an application is aware of the shortage of affordable housing in the Borough, meaning that few if any applicants on our register are just 'waiting out their time'. The Council maintains an active housing needs register which is reviewed annually. Applicants have to re-register each year. A points based system is operated with points being allocated according to their circumstances which indicate their relative 'housing need'.	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Part 2, para 4.1	Object. Starting point should be the net number of houses not the gross.	The approach to affordable housing contribution has been confirmed in the Council's Core Strategy after examination. This is based on gross provision.	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Part 2, para 5.5	Object. Unreasonable to rule out the possibility of a developer buying in to the existing stock in the Borough. There may be valid circumstances where the purchase of existing housing stock should be encouraged	Meeting our affordable housing target (of 950 dwellings in the Core Strategy 2007-2022) should not be at the expense of the existing stock of open market housing. There is a shortage both of market and affordable housing in the Borough. If developers were to buy into the existing stock in the Borough, whilst they may be meeting part of the requirement for affordable housing, this would reduce the stock of existing private sector dwellings, undermining the Council's role in seeking to 'balance' the local housing market.	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Part 2, section 6	The principal of additionally has been rejected at appeal.	No evidence of the circumstances of the appeal decision referred to have been provided. The reference to "additionality" is misleading. The approach set out in the SPD is in accordance with Government advice in Circular 05/05 and with PPS3. It is accepted that it is a difficult concept to grasp, but the Council has provided a full explanation (with worked examples) in the SPD.	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Part 2, section 6	The proposal is at odds with Circular 05/2005 ('fairly and reasonably relate')	Not accepted. This section of the SPD accords with Circular 05/05	No change

9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Part 2, section 6	The proposal is at odds with PPS3 para 29 where off-site provision should be of broadly equivalent value to on site provision- the requirement to provide a higher contribution off site is unacceptable and contrary to national planning policy	The Council interprets the PPS3 requirement differently from this objector. By ensuring the affordability ratio is maintained, this part of the SPD does ensure that off site provision would be broadly equivalent in value to on site provision. Using an example in the SPD, if a developer was providing 100 open market houses on a site where a 40% affordable housing was required by policy, the on site provision of affordable homes would be 67 (not 40 as the objector implies). Maintaining the affordability ratio ensures that the PPS3 advice is met.	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Part 2, section 7	It is not the Council's role to determine whether a developers appraisal is acceptable. This is contrary to Circular 05/2005 as the Council is by all intents 'securing a share in the profits of development.'	Not accepted. The 'open book' development viability approach assists the LPA's understanding in cases where viability is considered marginal by the developer. The SPD is designed to ensure that the additional impact from each additional unit is being accounted for.	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Part 2, para 8.6	Object. Neither PPS3 nor the companion document mention any lack of distinction between sheltered and market housing. It should be stated where such 'Government' confirmation can be found.	Not accepted. The confirmation was contained in a letter from GOSE (Regional Director, Rolande Anderson) to all LA Chief Executives dated 13 March 2006. This was referred to in the examination of the Council's Core Strategy and accepted by the Inspector.	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Part 2, para 9.3	Affordable Housing should not be required to meet the Housing Corporation standards where no public subsidy or affordable housing grant is involved	Not accepted. This is desirable in the interests of achieving sustainability in individual developments and in achieving sustainable communities.	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Part 2, para 10.1	Government guidance in 'Delivering Affordable Housing' is clear that LAs should not adopt restrictive practices. Para 49 states: 'Local Authorities should not prescribe affordable housing providers in planning conditions, obligations or LDDs.'	Noted, but this paragraph does not suggest restrictive practices. Most LAs have preferred partner RSLs who they will work with, but in fact this Council actually has a long list of RSLs with whom it will work. In reality, there are over 15 RSLs represented in the Borough, with a social housing stock of only 2,500 units.	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Part 2, para 10.7	Schemes requiring shared communal areas such as flats are often unsuitable for mixed tenures as it is unlikely that costs can be split equitably	Noted. However there are a number of schemes nationally where communal areas are shared, particularly mixed tenure Extra Care schemes. In these cases any potential difficulties with splitting costs have been overcome. Increasingly RSL's do not insist that separate entrances and communal areas are essential. This highlights the importance for developers to seek pre application planning advice, to engage RSL's in the process as soon as possible, and to ensure that the affordable housing requirement is considered at the point of site appraisal and acquisition. This will help to ensure that where it is absolutely necessary, schemes can be designed to incorporate separate stairwells or entrances for the affordable element. The Housing Corporation website includes details of a number of schemes where market housing, shared ownership and rented housing are integrated on both general needs and extra care housing sites. With the aim of creating sustainable communities, the Council would not tend to agree that concerns over splitting the costs of service charges is a justified excuse for creating mono tenure hous	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Part 2, para 10.9	Stair-casing receipts should only be re-used where public subsidy was originally involved and only apply to the original value of the subsidy	The Council needs to provide and protect affordable housing in its area to meet identified housing needs, and therefore requires that all social rented housing is provided in perpetuity through the use of Section 106 planning obligation. This is usually achieved through management of the affordable housing by a Registered Social Landlord. Social rented homes subsidised by grant funding are subject to the legal Right To Buy/ Acquire provisions. Shared Ownership or New Build HomeBuy homes will remain affordable in perpetuity but may be subject to occupiers 'stair-casing' to full ownership by purchasing additional equity in the property. The grant that was initially invested and the additional equity purchased by the occupier can generally be re-cycled to fund new affordable housing elsewhere in the Borough.	No change

9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Part 2, para 11.1	Lenders may not find covenants acceptable	The Council needs to provide and protect affordable housing in its area to meet identified housing needs, and therefore requires that all social rented housing is provided in perpetuity through the use of Section 106 planning obligation. This is usually achieved through management of the affordable housing by a Registered Social Landlord. Social rented homes subsidised by grant funding are subject to the legal Right To Buy/ Acquire provisions. Shared Ownership or New Build HomeBuy homes will remain affordable in perpetuity but may be subject to occupiers 'stair-casing' to full ownership by purchasing additional equity in the property. The grant that was initially invested and the additional equity purchased by the occupier can generally be re-cycled to fund new affordable housing elsewhere in the Borough.	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Appendix B	Object in its entirety	This objection is linked to comments made and responded to earlier in Part one. This appendix is provided to guide what sorts of information are required should a developer wish to raise matters of scheme viability. In this respect it provides clarity and useful guidance.	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Appendix C	Object. Unreasonable to expect financial contributions that assume a nil grant position. The level of contribution will stifle development.	Grant cannot be relied upon in all cases. The Housing Corporation has indicated that funding for Sec 106 sites will not be available in coming years. The opportunity to receive grant has tended to inflate land values on Sec 106 sites, and this is not the desired outcome in the future. The basis of calculating the commuted payment contributions is realistic and justified.	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Appendix D	Strongly object	This objection is linked to representations raised earlier regarding affordable housing policy. What this formula in Appendix D achieves is the maintenance of the affordability ratio which ensures Policy CS12 of the Core Strategy is met	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	Appendix E	Error 1+5=96?	Agreed, however error relates to 5 and 1 - they should be 75 and 21 respectively	Appendix E amended
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	General	The Core Strategy Inspector's report was critical in relation to affordable housing targets and lack of local evidence to demonstrate economic viability.	The Core Strategy policy was found sound by the Inspector. General Surrey-wide viability evidence was used at the examination. A detailed viability study would only be a snapshot in time and reflect a limited number of scenarios. The open book approach in the SPD is flexible, allowing a realistic level of contributions to be gained, while ensuring the development remains viable. The review in two years time can include an assessment of the SPD's impact on development viability.	No change
9	Ms L Aldington	Planning Issues on behalf of Churchill Retirement Living	General	PPS3 makes it clear that the plan wide target for affordable housing should reflect an economic viability of land for housing (para 29), but unable to find such an exercise. As a result it appears as though matters of whether the targets and thresholds are viable & sustainable have been left to the developer to illustrate in retrospect, this doesn't accord with the approach prescribed in PPS3	The Core Strategy policy was found sound by the Inspector. General Surrey-wide viability evidence was used at the examination. A detailed viability study would only be a snapshot in time and reflect a limited number of scenarios. The open book approach in the SPD is flexible, allowing a realistic level of contributions to be gained, while ensuring the development remains viable.	No change
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	General	Supports tariff- based contributions and the calculation being based on each additional resident (except transport)	Noted. The issue of transport dealt with in a later section.	No change
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	General	Object to lack of clarity in how the net increase in residents is to be calculated. It is unclear whether the average occupancy levels are to be applied to all residential schemes or an alternative figure can be applied if it can be demonstrated that a specialist dwelling types has a much lower occupancy level.	The intention is that average occupancy will be used for all schemes. These rates will be reviewed following two years of the operation of the SPD.	Part 1, para 2.2 amended to clarify the intention to review / update the SPD
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	General	CRLs records show that the average occupancy rates for their apartments are considerably lower than table 2 (appendix F) and that it would be unfair to expect developers of such schemes to provide such a tariff as they would be subsidising other developers.	The purpose of the SPD is to help avoid the need for site by site negotiation of the majority of individual development sites. Although the Council will seek to apply the tariffs in a consistent way, it will not adopt a blanket approach. Where there are clearly identifiable variations in actual impacts of development, negotiation will be appropriate	Part 1, para 7.3 amended to clarify the application of the tariffs

10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	General	A table should be included with the average occupancy levels for houses/flats/ sheltered accommodation over the range of bedroom numbers.	At this stage the Council proposes to use the average occupancy rates which are based on County Council data. The Council will re-evaluate this position when a review of the SPD is commenced.	No change
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	Part 1, sec 8	For clarity the Council should indicate how they propose to increase contributions in accordance with the Retail Price Index. CRL considers that the RPI is not the appropriate method and believes that the Council should commit to updating all figures on an annual basis	While it is accepted that the cost of providing for particular contributions may deviate from the RPI in the short term, it is considered that there is longer term correction and the use of a single index offers the merits of simplicity.	
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	Part 1, para 9.11	Object to 5% admin fee and feel it is unreasonably high. There is no transparency as to how the 5% will be spent, need to provide a breakdown or delete.	Circular 05/05 states that it is for LPAs to decide which matters to address through standard charges and formulae (B33). The intention is that the money will be used to fund officer time to specifically to track, manage and review progress with legal agreements and developer contributions. This is in line with practice elsewhere. This approach will help ensure transparency in the process and support the objective of achieving full accountability in the spending of monies received. The charge will also be used to develop and refresh spending programmes and update and amend the figures. These tasks are not currently undertaken by the Council and the number of developer contributions will increase, thereby demanding more Council resources.	
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	Part 1, para 9.11	An individual admin sum should be calculated based on the terms of the sec 106 not on % as not proportionate.	It is accepted that there are alternative ways of calculating the contribution for administrative costs. However a % contribution provides a clear and easily understood method of charging the administrative costs involved, and has been applied elsewhere. It is likely that the level of the contribution can be negotiated on schemes where a larger financial contribution is to be paid. The approach will be reviewed after two years of operation.	No change
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	Part 3, sec 2	Support exclusion of sheltered housing	Noted	No change
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	Part 3, sec 3	Object to lack of specific consideration of sheltered housing in relation to transport contributions.	The SPD does not attempt to address every specific type of development and some schemes, particularly those for larger developments will need to be discussed on a case by case basis when all the necessary details are known. Where there are clearly identifiable variations in actual impacts of development, negotiation will be appropriate.	Part 1, para 7.3 amended to clarify the application of the tariffs
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	Part 3, sec 3	Sheltered housing should be given a substantial discount. The transport contribution is based on a country wide trip rate but sheltered housing gives rise to a demonstratable significantly lower trip (approx 1/3) rate than general purpose housing (no work or school commute). Sheltered housing occupants have significantly lower car ownership levels and place less demand on the transport infrastructure.	The SPD does not attempt to address every specific type of development and some schemes, particularly those for larger developments will need to be discussed on a case by case basis when all the necessary details are known. Where there are clearly identifiable variations in actual impacts of development, negotiation will be appropriate.	Part 1, para 7.3 amended to clarify the application of the tariffs
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	Part 3, sec 3	The expected trip rate of the development should form the basis of the transport contribution	The tariff approach provides simplicity, predictability and consistency to deliver the level of certainty that developers seek. Nevertheless, occasional variations may be negotiable based upon clear and robust evidence that the tariff does not relate fairly to the impact of the development.	No change
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	Part 3, sec 3	There is no transparency in calculating this tariff & it would not pass the tests at para B5 of circular 05/05 Annex B.	The calculation of the tariff is clearly set out in the SPD.	No change

10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	Part 3, sec 3	The 2 tier tariff based on town centre & elsewhere is crude and inequitable. The town centre boundary does not consider ease of walking to certain key facilities or public transport and sites adjacent to the centre are often more accessible than those within it. Need a Borough-wide tariff with an opportunity to negotiate where developers can demonstrate that they will achieve sig lower than average trip rates.	The Council is initially intending to use the existing defined town and local centre boundaries. This provides clarity and certainty. Should a developer provide evidence in negotiation which demonstrates high equivalent levels of sustainability, this would be taken into account by the LPA. The 30% reduction and 30% increase were considered to be an equitable method of dividing the total responsibility to pay for the mitigation of the impact of the overall levels of development. The additional charge provides a worthwhile differentiation between out of town sites and town centre sites. Bus services are at their most viable in town centres, with operations becoming more marginal in the areas. There is therefore justification for charging more in areas away from town centres.	Part 1, para 7.3 amended to clarify the application of the tariffs
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	Part 3, sec 4	No objection but what would the Council do if a surplus of library floorspace could be demonstrated?	It is intended that the libraries contribution be used for qualitative improvements even if surplus floorspace can be identified. The libraries service is undergoing transformational change which will enhance access to information for all sectors of the community. New residents can rightly expect that their needs will be met in terms of capacity and the capability of the service.	No change
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	Part 3, sec 5	No objection. Question how we would deal with a situation where a surplus of GP spaces is demonstrated	It is intended that the PCT contribution be used for all kinds of healthcare developments from new buildings to minor improvements and service developments, which ensures the service matches the needs of the catchment population. Contributions will be spent within the same practice catchment as the new development.	No change
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	Part 3, sec 6	Reduced tariff should be 75% as the majority of the land area will be to provide for large sports pitches which are almost never used by the occupants of sheltered housing.	Agreed.	Part 3, para 6.9 amended to reflect comment
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	Part 3, sec 7	Object. No real justification has been given for the figure of £500 per person and would clearly fail the tests set out in B5 of circular 05/05.	This figure represents the aggregation of £250 for environmental enhancements in the vicinity of the development and the same sum for use in Epsom Town Centre which contains services used by the whole community. It is a reasonable estimate based upon the typical cost of enhancement schemes.	No change
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	Part 3, sec 8	Object to lack of clarity in calculating the tariff.	The tariff is based on the per person subsidy provided by the Council to provide its current range of community facilities	No change
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	Part 3	Both public open space (Hook Road Arena) and buildings accommodating libraries (Ewell Court House & Ebbisham Centre) have their own separate tariffs and developers shouldn't have to contribute twice.	The library tariff deals with only one activity within the buildings referred to. Agree to remove Hook Road Arena from the Community facilities tariff	Reference to Hook Road Arena removed
10	Mr D Wilden	Planning Issues, on behalf of Churchill Retirement Living, same address	Part 3, sec 9	Object to lack of consideration that shared communal refuse bins will be less costly.	The SPD does not attempt to address every specific type of development and some schemes, particularly those for larger developments will need to be discussed on a case by case basis when all the necessary details are known.	No change
11	Mr J Cheston	Government Office for the South East (GOSE)	General	"It seems to us that the approach outlined in the SPD is consistent with national planning policy on planning obligations, as set out in ODPM Circular05/2005, and we have no further comments to offer."	Noted.	Reference made to this support in Part 1, para 1.3
12	Ms R Freeman	The Theatre Trust	Part 3, para 9.1	Welcome recognition that cultural facilities are integral.	Noted	No change
12	Ms R Freeman	The Theatre Trust	Part 3, para 9.1	Concerned that theatre buildings do not benefit appropriately under the terms of s106 and other agreements and that it will increasingly be necessary to unlock new sources of funding to help pay for improvements to them.	Epsom Playhouse will be a beneficiary under the Community Facilities tariff.	No change
13	Mr S Avery	Bell Cornwell on behalf of Gladedale Homes	General	Concern / clarification that infrastructure contributions would not normally be required for developments or those parts of developments which are to be secured for Council Nomination rights, as these would relate to existing residents of the Borough, so would not be adding any new infrastructural burden.	The Council acknowledges that people on their housing register are already resident within the Borough. The Council intends to deal with this point by exempting social rented housing from the tariff. This will serve to enable the delivery of affordable housing in a competitive market.	Part 1, para 8.11 amended to reflect response to comment

14	Mr M Boyd	Epsom Protection society	Part 1. Para 3	Financial contributions should be firmly allocated so that the money is not diverted elsewhere.	Agreed. The spending of the contributions will be determined by the Councils in accordance with the requirements of Circular 05/05. Monies will be ring fenced and spent in accordance with the Circular and the individual agreements. Schemes will be identified through an established protocol with Surrey County Council and through the Council's own internal processes.	No change
14	Mr M Boyd	Epsom Protection society	Part 1. Para 7.4	The detailed records of all monies negotiated received and paid out should be available for public scrutiny to assist openness and transparency	Agreed. It is the intention to develop and improve our existing monitoring systems and publish annually the schedule of monies received / or committed and the progress towards securing the related infrastructure projects. It is the intention the admin fee will fund officer time to oversee this process.	Part 1, 9.11 to 9.13 revised to clarify the monitoring and management of planning obligations
15	Mr R Evans	Surrey County Council	General	The SPD should refer to saved Structure Plan Policy DN1 on infrastructure requirements.	The SPD refers to Structure Plan Policy DN1, in part 1, para 1.2	No change
15	Mr R Evans	Surrey County Council	General	Support- intention to act as co-ordinating authority for collection of monies.	Noted	No change
15	Mr R Evans	Surrey County Council	General	Support- approach to standardised rates for infrastructure contributions	Noted	No change
15	Mr R Evans	Surrey County Council	General	Support- details of tariff and planning obligations approach.	Noted	No change
15	Mr R Evans	Surrey County Council	General	Support- 5% admin charge.	Noted	No change
15	Mr R Evans	Surrey County Council	General	Suggest a section on the review of the tariff approach be included to take account of changes over time that will affect costs of infrastructure, as well as the changing situation with regard to service capacity on the ground	Agreed	Part 1, para 2.2 amended to clarify the intention to review / update the SPD
16	Mr P Errington	Home Builders Federation	General	Approve of the tiered approach regarding the Council's priorities for obligations	Noted	No change
16	Mr P Errington	Home Builders Federation	Part 1, para 5.1	This should be amended to refer to Paragraph B7 (Betterment Levy) and B9 (Deficiencies) of the circular 05/05.	Agreed.	Reference added to Part 1, para 5.1
16	Mr P Errington	Home Builders Federation	Part 1, para 7.1	Affordable housing should not be referred to as an 'infrastructure requirement' as it is clearly not one. Sentence should be amended	Agreed.	Part 1, para 7.1 amended
16	Mr P Errington	Home Builders Federation	Part 1, para 7.2	Pooled contributions need to have a 'direct relationship'.	Agreed. The spending of the contributions will be determined by the Councils in accordance with the requirements of Circular 05/05. Monies will be ring fenced and spent in accordance with the Circular and the individual agreements. Schemes will be identified through an established protocol with Surrey County Council and through the Council's own internal processes.	No change
16	Mr P Errington	Home Builders Federation	Part 1, sec 8	Welcome the general approach	Noted.	No change
16	Mr P Errington	Home Builders Federation	Part 1, sec 8	Housebuilders will often buy land once planning permission has been secured and the full extent of their liability becomes evident. At the very least, land will be optioned taking these liabilities into account. Thus over-burdensome and expensive regulatory demands and obligations may mean that housebuilders will be forced to retreat from developing certain sites in the Borough. The SPD should be amended to reflect this.	The text does not distinguish between buying land with or without planning permission. The point is that developers should factor in developer contributions at the earliest stage.	No change
16	Mr P Errington	Home Builders Federation	Part 2, affordable housing	A more flexible approach to the delivery of the 35% affordable housing target and the 950 new homes by 2022 would yield more affordable homes. E.g. a target of 30% on a development of 200 will still yield more affordable housing than a target of 40% on a development of 100.	Policy is set in the adopted Core Strategy and provides a reasonable degree of flexibility. There is scope for negotiation should a site potentially be unviable and this is set out in the SPD.	No change

16	Mr P Errington	Home Builders Federation	Part 3	Concern that the SPD presumes that facilities do not already exist and that all new development will need to make full provision.	The SPD addresses the incremental impact on infrastructure resulting from numerous small scale developments and does not assume that all existing infrastructure is at capacity. Policy CS12 refers to development which creates "...the need to provide additional or improved community facilities and infrastructure, or would exacerbate the existing deficiency in their provision..." It would be difficult to identify a 'tipping point' for some of the tariffs and it is fairer if all developments are treated equally. The Council will seek to apply the tariffs in a consistent way, but without adopting a blanket approach. Circular 05/05 B22 states "in some cases, individual developments will have some impact but not sufficient to justify the need for a discrete piece of infrastructure". Local planning authorities may therefore seek contributions for future provision.	No change
16	Mr P Errington	Home Builders Federation	Part 3	The nature/ extent of the additional provision must relate to extra demand created rather than the existing deficiency.	This basic principle is embodied in Circular 05/05 and is accepted. The tariff is set at a rate to address the shortfall in provision resulting from the increase in population.	No change
16	Mr P Errington	Home Builders Federation	Part 3	Conversely, in areas showing a surplus of provision there is no justification for seeking the same full tariff, as pressure for new development will be absorbed by surplus capacity at existing facilities. The SPD should be amended to reflect this, rather than adhering to the fixed district-wide standards.	The Borough is small and compact, and for each locality it would be very difficult to identify clearly whether there is a surplus of provision of many types of infrastructure. The formulae and charges only apply to those types of function or service where there is a clear deficit and long term failure to increase provision in line with population increases. The levels of charge are set only at that required to match new provision for the new population, and not to rectify past under provision.	No change
16	Mr P Errington	Home Builders Federation	Part 3	Considers that although a standard tariff can be beneficial in terms of consistency, clarity & simplicity, it should be applied flexibly having regard to the level of existing provision and use of facilities. The draft SPD must address these issues to be in line with guidance.	The SPD addresses the incremental impact on infrastructure resulting from numerous small scale developments and does not assume that all existing infrastructure is at capacity. The Council will seek to apply the tariffs in a consistent way, but without adopting a blanket approach.	
16	Mr P Errington	Home Builders Federation	Part 3	Obligations must be applied flexibly in order to encourage, not obstruct, vital social development such as housing. The LA might have to consider providing the necessary infrastructure itself in order to encourage development.	Noted. The 'open book' approach is used to ensure the SPD will not obstruct housing development. The Council is currently meeting its housing targets comfortably and will continue to monitor performance and keep this position under review.	No change
16	Mr P Errington	Home Builders Federation	Part 3	The occupancy figures are out of date and generate artificially high figures. Reference instead should be to CLG Housing Statistics 2007.	Occupancy rates will be re-assessed when the SPD is reviewed. The CLG housing statistics do not identify specific occupancy rates.	Part 1, para 2.2 amended to clarify the intention to review / update the SPD
16	Mr P Errington	Home Builders Federation	Part 3, sec 3	Developers should only be expected to pay for & mitigate new travel demands proportionate to the demand created by the development in question, & not to subsidise the Council's statutory highways responsibilities.	This principle is accepted. The tariff is calculated to mitigate the impact of a development and not to subsidise the Council's statutory highways responsibilities.	No change
16	Mr P Errington	Home Builders Federation	Part 3, sec 3	The SCC trip rates have no bearing on calculating the actual demands generated by new developments. Concern that there is no guarantee that pooled funds will be used to accommodate or mitigate the impact of increased traffic, & instead be paid into a general pot.	The tariff is calculated to mitigate the impact of a development and not to subsidise the Council's statutory highways responsibilities. Monies will be ring fenced and spent in accordance with the Circular and the individual agreements. Schemes will be identified through an established protocol with Surrey County Council	Part 1, 9.11 to 9.13 revised to clarify the monitoring and management of planning obligations

16	Mr P Errington	Home Builders Federation	Part 3, sec 4	Need to justify this tax with more robust evidence that there is not a surplus capacity.	It is intended that the libraries contribution be used for qualitative improvements even if surplus floorspace can be identified. The libraries service is undergoing transformational change which will enhance access to information for all sectors of the community. New residents can rightly expect that their needs will be met in terms of capacity and the capability of the service.	No change
16	Mr P Errington	Home Builders Federation	Part 3, sec 5	Evidence needs to be provided to show that additional health provision has been generated by new development and compared with surplus capacity which already exists.	It is intended that the PCT contribution be used for all kinds of healthcare developments from new buildings to minor improvements and service developments, which ensures the service matches the needs of the catchment population. Contributions will be spent within the same practice catchment as the new development.	No change
16	Mr P Errington	Home Builders Federation	Part 3, sec 6	No attempt has been made to assess existing provision.	Not accepted. We have drawn information from a PPG17-compliant Open Space study which fully assessed the Borough's provision of open space.	No change
16	Mr P Errington	Home Builders Federation	Part 3, sec 6	The use of commuted sums to maintain public open space directly contravenes para B19 of circular 05/05 which states that services intended for wider public use should be maintained by the public authority.	Noted. The contributions are to mitigate additional pressure placed on open space by population generated by new development, not for general upkeep of existing spaces. The requirements of Circular 2005/05 are clear and will be met. The Council will ensure that funds received from this tariff for maintenance are directed towards the appropriate schemes. This will be monitored. As specified in Circular 05/05 maintenance payments will only be sought where the provision of the facilities are predominantly for the benefit of the users of the associated development, or for an initial 'pump priming' period for those intended for wider public use.	Part 3, para 6.7 amended to reflect this
16	Mr P Errington	Home Builders Federation	Part 3, sec 7	This is not priority. CA should pay for their up keep themselves, and such a policy is highly unjust.	Contributions towards environmental improvements should only be spent within CAs when they are generated by a development within the CA itself. It is the developer who would be likely to benefit from an increased sale price in the first instance arising from the location within a CA. It is reasonable to require that development to continue to maintain those standards and to mitigate the impact of the additional population the development generates within the CA.	Amendment made to Part 3, para 7.5
16	Mr P Errington	Home Builders Federation	Part 1, para 9.11	Object in principle to a further fee- unjust and unreasonable.	Circular 05/05 states that it is for LPAs to decide which matters to address through standard charges and formulae (B33). The intention is that the money will be used to fund officer time to specifically to track, manage and review progress with legal agreements and developer contributions. This is in line with practice elsewhere. This approach will help ensure transparency in the process and support the objective of achieving full accountability in the spending of monies received. The charge will also be used to develop and refresh spending programmes and update and amend the figures. These tasks are not currently undertaken by the Council and the number of developer contributions will increase, thereby demanding more Council resources.	No change
17	Ms P Foulks	Access Group, Ewell	General	No reference to accessibility for disabled- physical/ sensory/ learning or mental health	Noted. However these issues are best dealt with in other forthcoming LDF documents, such as the Design guidance SPD and DC Policies DPD.	No change
18	Mr A Lloyd	Howell Hill Residents Association	General	General comments regarding the need for improved roads and water/ sewerage systems.	Noted. Contributions are required towards transport while the document cannot cover water & sewerage due to alternative funding arrangements.	No change

18	Mr A Lloyd	Howell Hill Residents Association	General	There is a lack of clarity as to how the funds would be used and much of it could be generated into the proposed Kiln Lane Link. The Council should look to building the Kiln Lane Link a lot sooner than suggested.	The spending of the contributions will be determined by the Councils in accordance with the requirements of Circular 05/05. Monies will be ring fenced and spent in accordance with the Circular and the individual agreements. Schemes will be identified through an established protocol with Surrey County Council and through the Council's own internal processes. Money should be used to mitigate of development. Pooling funds for the Kiln Lane Link may not meet the tests set out in Circular 05/05 and would deflect funds from other smaller scale infrastructure. The Kiln Lane link may be a suitable candidate for funding through the proposed Community Infrastructure Levy (CIL)	
19	Mr K Lugton	Nonsuch Park Residents Association	General	Clear and unambiguous and will enable developers to know where they stand.	Noted.	No change
19	Mr K Lugton	Nonsuch Park Residents Association	General	Criticise that the calculation basis as set out does not appear to say specifically that the contributions are cumulative and that the developer has to pay them all.	Noted. The SPD provides guidance as to what is required on an individual site development. The purpose of the SPD is to help avoid the need for site by site negotiation on the majority of individual development sites. Although the Council will seek to apply the tariffs in a consistent way, it will not adopt a blanket approach. Part 1, para 7.2 states it may be more appropriate for the Council to pool contributions.	No change
19	Mr K Lugton	Nonsuch Park Residents Association	General	There should be clarity about settlement. Needs to be a procedure referenced in this document	The SPD states that infrastructure contributions will normally become payable on commencement of the development unless an alternative phasing is agreed.	Part 1, para 9.10 revised to reflect this
19	Mr K Lugton	Nonsuch Park Residents Association	General	Concern that there is no reference to how the funds collected will be accounted for or applied. Needs to be procedures of collecting into an account and sub- dividing to their stated purpose. The full account should be published on a regular basis with explanations of expenditure.	Noted. The Council agree to account for funds in such a way that they are used for projects directly related to the development. These projects may not have been identified at the time when permission is granted. Schemes will be identified through an established protocol with Surrey County Council and through the Council's own internal processes. The PCT undertakes to allocate monies raised to new build or premises improvements within the same practice catchment area as the proposed development.	Part 1, 9.11 to 9.13 revised to clarify the monitoring and management of planning obligations
19	Mr K Lugton	Nonsuch Park Residents Association	General	No reference to ensuring funds collected are allocated for their stated purpose and location.	The spending of the contributions will be determined by the Councils in accordance with the requirements of Circular 05/05. Monies will be ring fenced and spent in accordance with the Circular and the individual agreements. Schemes will be identified through an established protocol with Surrey County Council and through the Council's own internal processes.	No change
19	Mr K Lugton	Nonsuch Park Residents Association	General	It is important that developers and residents can see that the contributions are being collected and used for specific and sensible purposes.	The Council will publish annually the schedule of monies received or committed and the progress towards securing the related infrastructure projects.	Part 1, 9.11 to 9.13 revised to clarify the monitoring and management of planning obligations
20	Mr P J Gilder	Association of Ewell Downs Residents	General	Allocation of funds and administration of other external service providers (Outside the Borough Council) by the Borough is not covered.	The spending of the contributions will be determined by the Councils in accordance with the requirements of Circular 05/05. Monies will be ring fenced and spent in accordance with the Circular and the individual agreements. Schemes will be identified through an established protocol with Surrey County Council and through the Council's own internal processes. The sustainability objectives are used specifically to appraise emerging LDF policies, not to prioritise spending.	Part 1, 9.11 to 9.13 revised to clarify the monitoring and management of planning obligations
20	Mr P J Gilder	Association of Ewell Downs Residents	General	The Sustainability Appraisal report provides objectives but no mechanisms	The detailed proposals contained in the SPD have been assessed against the sustainability objectives to ensure they will assist with their delivery and that negative impacts have been reduced or mitigated.	No change

20	Mr P J Gilder	Association of Ewell Downs Residents	Part 1, para 7.6	A Clause needs to be added stating that funds are to be applied according to the objectives in the SA	The spending of the contributions will be determined by the Councils in accordance with the requirements of Circular 05/05. Monies will be ring fenced and spent in accordance with the Circular and the individual agreements. Schemes will be identified through an established protocol with Surrey County Council and through the Council's own internal processes. The sustainability objectives are used specifically to appraise emerging LDF policies, not to prioritise spending.	Part 1, 9.11 to 9.13 revised to clarify the monitoring and management of planning obligations
20	Mr P J Gilder	Association of Ewell Downs Residents	Part 1, para 9.2	Add 'Intended use of contributions to be recommended in the planning application, after consultation with the developer (thus available to planning committee and public)	The spending of the contributions will be determined by the Councils in accordance with the requirements of Circular 05/05. Monies will be ring fenced and spent in accordance with the Circular and the individual agreements. Schemes will be identified through an established protocol with Surrey County Council and through the Council's own internal processes.	Part 1, 9.11 to 9.13 revised to clarify the monitoring and management of planning obligations
20	Mr P J Gilder	Association of Ewell Downs Residents	Part 1, para 9.2	Uses controlled by the Borough to be selected according to Council policies (e.g. actions in the BAP)	Noted. The spending of the contributions will be determined by the Councils in accordance with the requirements of Circular 05/05. Monies will be ring fenced and spent in accordance with the Circular and the individual agreements. Schemes will be identified through an established protocol with Surrey County Council and through the Council's own internal processes.	Part 1, 9.11 to 9.13 revised to clarify the monitoring and management of planning obligations
21	Mr P Bevan	South East of England Regional Assembly (SEERA)	General	The SPD is in general conformity with the RSS and the emerging Draft South east Plan	Noted.	Reference added to Part 1, para 1.3
21	Mr P Bevan	South East of England Regional Assembly (SEERA)	General	Would like to see added specific reference to delivering the SE Plan, and the implementation plan.	Agreed.	Reference added to Part 1, para 1.3
21	Mr P Bevan	South East of England Regional Assembly (SEERA)	General	Should consider whether need to contribute to other key public services such as the emergency services	This was considered at the preparation stage. The beneficiaries selected are those agreed jointly in collaboration with other Surrey authorities. It is intended that the SPD will be reviewed after two years of operation. The scope of the SPD will be reconsidered at that stage, taking into account the final approved South East Plan.	Part 1, para 2.2 amended to clarify the intention to review / update the SPD
21	Mr P Bevan	South East of England Regional Assembly (SEERA)	General	Assume that 'community and cultural facilities' covers sports halls in line with para 3.17.7 of the Core Strategy, but this is not clear, or are they not included	At present there is no specific proposal for indoor facilities although the demand has been recognized in the Open Space and Recreation Study. There is a current proposal to improve Court Recreation Ground, which will contain some small scale indoor facilities (changing rooms); this will be covered by the contribution to outdoor facilities. The Council will keep its programme of schemes under review and indoor facilities may be added if the need warrants it.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	General	The draft SPD reads as if there are no alternatives to Planning Obligations although Circular 05/05 states that Planning Obligations should only be used when the use of planning conditions is not possible.	Noted, however, it is considered that a legal agreement is the appropriate mechanism for securing financial contributions such as this.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	General	It is important to note that there are a number of parts of the SPD which seem to create major new policy, and this practice is not in accordance with central government guidance in PPS12 (Should be in DPD).	The principles for seeking planning contributions are set out in policies CS4, CS9 and CS12. Details contained in the SPD would be inappropriate in a DPD. The SPD provides clear guidance on the mechanics and costings to underpin the policy, as referred to in the Core Strategy.	No change
22	John Sharkey &	On behalf of the University College for	Formulae and	It seems that, as the majority (if not all) of the standard charges and formulae set out in this draft SPD may be based on costs/charges for the whole of Surrey, rather than just Epsom and Ewell, the Council is taking a	The EEBC tariffs are based on local data. The Surrey County Council charges relate to Surrey data. Although the Council will seek to apply the tariffs in a	No change

22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	General	The SPD should make it clear in accordance with paragraph B27 of Circ 05/05, where "contributions are made towards specific infrastructure provision but the infrastructure is not provided within an agreed timeframe, arrangements should be made for contributions to be returned to developers".	It is reasonable if the money was never to be spent for there to be a repayment. However, it should be recognised that pooled contributions are often towards long term projects and therefore such a 'return' of monies should only come into effect after a longer period.	Part 1, 9.13 revised to reflect comment
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	General	In accordance with Circular 05/05, the Council should include a statement that they will maintain a database of completed legal Agreements which will be available for inspection, free of charge, by members of the public.	The Council will publish annually the schedule of monies received or committed and the progress towards securing the related infrastructure projects.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 1, para 4.2	(2nd sentence) Not in accordance with 05/05 Para B18 and B19 and therefore there should never be a need for a developer to contribute to the maintenance of an agreed benefit.	Contributions will be spent in accordance with Circular 05/05: maintenance payments will only be sought where the provision of the facilities are predominantly for the benefit of the users of the associated development, or for an initial 'pump priming' period for those intended for wider public use.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 1, para 7.4	Surrey County Council is not the only organisation responsible for education in the borough, as there are two providers of Further/Higher Education.	Accepted, but this paragraph refers to compulsory state education (up to the age of 16).	Part 3, para 2.1 amended to reflect comment
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 1, para 8.5	Bearing in mind that this document is intended to cover a minimum period of 10 years, there must be the possibility that the Council's priorities will change over time, especially the 2nd and 3rd priorities. This paragraph should therefore be deleted	The SPD will be reviewed and updated in response to changing circumstances. The Council has committed to commencing a review after two years of operation. The list clearly sets out the Council's current order of priority and has been welcomed by other respondents.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 1, para 8.11	The representor submitted a paper which suggests that where an education facility is being constructed (and requires planning permission), because the Higher Education Institution is a "not for profit" organisation, it does not have a profit margin to fund planning obligations, and the SPD should make an allowance for this. UCCA therefore considers that in such circumstances it should not have to make a contribution to "social infrastructure". Where an education site is being disposed of, UCCA believes that the LPA should take into account the purpose of the disposal, and the use to which the disposal proceeds will be put, when considering the extent of the Developer Contributions being sought. This is because disposal income will be re-invested in the Higher Education Institution (itself a community facility) perhaps in the form of new, improved, or enlarged facilities. The College accepts that even in these types of instances the development should make a contribution towards "physical infrastructure" (as defined in paragraph 3.1 of the SPD).	The SPD does not attempt to address every specific type of development and some schemes, particularly those for larger developments will need to be discussed on a case by case basis when all the necessary details are known. However the Council already indicates in paragraph 8.11 of the draft SPD that community infrastructure projects (such as education) that are providing direct benefit to the area will not normally be required to contribute. UCCA provides such a benefit which is recognised in the Core Strategy (section 3.17) and this will be taken into account in any negotiation. It is not accepted however that when an institution is disposing of land or buildings for residential purposes (to re-invest in the Institution concerned), any contribution will by definition "jeopardise the viability" of the broader education project. The requirement for developer contributions may well reduce the amount of financial return on the disposal, but this will need to be reflected in the scope and content of the project envisaged. New residential development will generate additional demands on social infrastructure and it is reasonable to expect that developme	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 1, para 8.11	The SPD should state that in the context of this sentence, 'education' includes Higher and Further Education (Refer to Position Paper 5/ Core Strategy Examination/ Community Strategy/ Core Strategy/ South East Plan/ Central Government thinking).	The SPD does not attempt to address every specific type of development. Some schemes, particularly those for larger developments will need to be discussed on a case by case basis when all the necessary details are known.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 1, para 8.11	The LPA should confirm that institutions such as the University College – which provide benefit to people living in an area wider than the Borough's boundaries – do provide facilities of "direct benefit to the local area".	The SPD does not attempt to address every specific type of development.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 1, para 8.11	Local planning authorities are being encouraged not to use the word "normally" in the planning policy documents, and therefore that word should be deleted from this sentence.	Not accepted. This is an acceptable use of the word in the context that it is used. It is not worded as a policy in itself, but expresses the likelihood that these sorts of projects will not usually be expected to contribute.	No change

22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	General	Student accommodation should be listed as an exemption on all 'infrastructure elements'.	Not accepted. Students will have an impact on infrastructure provision and purpose-built student accommodation should attract infrastructure charges.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 1, para 9.3	This is not in accordance with central government guidance in Circular 05/05, and this sentence (together with similar sections of the SPD) should therefore be deleted	This is to encourage the early identification of the appropriate level of contributions and to avoid lengthening the time taken to determine applications. The Council and GOSE are satisfied that the approach taken in this SPD accords with Circular 05/05.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 1, para 9.3	This paragraph should also state there will be a maximum charge of £500.	The legal charge will be absorbed within the admin fee (although reserve the right to charge for legal costs should applicants wish to materially change the standardised template)	Part 1, para 9.3 & 9.6 amended to remove the requirement for a legal charge in every case
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 1, para 9.6	Those documents should be available as part of this SPD and therefore consultation should only take place once this SPD is complete.	Not accepted. The draft unilateral agreement will reflect the contents of the SPD and is not an essential part of this consultation exercise.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 1, para 9.8	There is no basis in Circular 05/05 for adopting a practice of using dual recommendations, and this provision should therefore be deleted.	This proposed internal Council procedure is in line with current practice, will facilitate the delivery of the SPD's requirements, and will ensure clarity in the Council's approach. It is not a matter which would be expected to be covered in 05/05.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 1, para 9.8	If the Council nevertheless intends to pursue this aspect, this paragraph should explain, in the necessary level of detail, what the Council means by ".... the necessary work on the requirement for contributions.....".	The necessary work is that necessary to complete the agreement / undertaking	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 1, para 9.10	This implies that if the applicant has not entered into the appropriate legal agreement during the period concerned then planning permission will be refused purely on that ground	The ground for refusal will be based on the development plan, and will reflect the failure to comply with an adopted policy such as one or more of those listed in the example given in the SPD.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 1, para 9.10	The reference 'to the 8 or 13 week target' would be understood by most people to mean either 8 weeks or 13 weeks from the date that the LPA has accepted that a valid planning application has been submitted.	Agreed	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 1, para 9.11	There seems to be no basis in Circular 05/05 for this type of charge to be levied, particularly bearing in mind that the applicant will also have to make a payment towards the Council's legal fees on dealing with the legal Agreement, as well as bearing their own legal costs.	Circular 05/05 states that it is for LPAs to decide which matters to address through standard charges and formulae (B33). The intention is that the money will be used to fund officer time to specifically to track, manage and review progress with legal agreements and developer contributions. This is in line with practice elsewhere. This approach will help ensure transparency in the process and support the objective of achieving full accountability in the spending of monies received. The charge will also be used to develop and refresh spending programmes and update and amend the figures. The legal fees will be absorbed within the admin fee.	Part 1, para 9.3 & 9.6 amended to remove the requirement for a legal charge in every case
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 1, para 9.11	Even if the principle of such a charge is accepted, there should be a cap – in the region of £500 – in respect of each application.	It is likely that the level of the contribution can be negotiated on schemes where a larger financial contribution is to be paid, although the more complex schemes will require more officer time to monitor.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 2, para 2.2	The Borough Housing Needs Survey does not include the needs of students	Noted. This is correct. However the needs of students were examined in the SHMA, as suggested by the Inspector conducting the Core Strategy examination.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 2, para 2.3	The UC has not had the chance to see the SHMA yet	Noted.	No change

22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 2, para 3.5	This SPD should make it clear that student residential accommodation can fall within the definition of affordable housing	Student housing is not affordable housing under the definition of PPS3. The provision of student accommodation can be addressed through policies in the emerging LDF. For the purposes of the SPD it is sufficient that such accommodation be exempt from the need to make any provision towards affordable housing. The nature and level of any tariff contributions would need to be negotiated on an individual basis, using the SPD as a starting point.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 2, para 8.2	The Council's housing needs register will not show the needs of students.	Students are not a group who have priority need for affordable accommodation.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 2, para 8.7	To say that student housing is not affordable housing because it is not permanent is to misunderstand the needs of Higher Education Institutions. The need for that institution to have student residential accommodation to offer to its students is permanent. In that respect, it is important to note that there are a number of institutions, throughout the country, that have provided, in the same building(s), residential accommodation for its students for 50 years or more.	The definition of affordable housing is clear (see para 3.4 of the SPD). Student accommodation is not housing which is provided to "specified eligible households whose needs are not met by the market." It is accepted that an educational institution may wish to provide specific student accommodation, but this is not the point. Student accommodation falls outside the definition adopted by the Council which itself is based on PPS3.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 2, para 8.7	The Council also dismisses student accommodation from Affordable Housing because it is provided to members of specified education institutions. Here again, the Council seems to be ignoring central government advice as Annex C of PPS3 requires local authorities to "identify the accommodation requirements of specific groups such as students". Moreover, paragraph 3.4 (on page 14) of this SPD specifically states that Affordable Housing is provided to specified eligible households.	Not accepted. The issue of student accommodation was considered by the recent SHMA. Most educational institutions do not rely on a LA whose main priorities are to try to house homeless and vulnerable people. Eligibility in this context means eligible for affordable housing. The Council operates a points-based Housing Needs Register which is highly unlikely to categorise a student who lives in the Borough temporarily, and who could rent privately or house share as someone who is in high housing need. The Inspector at the Core Strategy examination accepted that student accommodation fell outside the definition of affordable housing for the purposes of operating planning and housing policies.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 2, para 8.7	The Report of the Panel that chaired the EIP into the emerging SE Plan specifically referred to that Plan needing "to recognise the importance of ancillary services for higher education establishments, including student accommodation"	Noted. Student housing is not affordable housing under the definition of PPS3. The provision of student accommodation can be addressed through policies in the emerging LDF. For the purposes of the SPD it is sufficient that such accommodation be exempt from the need to make any provision towards affordable housing. The nature and level of any tariff contributions would need to be negotiated on an individual basis, using the SPD as a starting point.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 2, para 8.7	In the Report of the Inspector who chaired the Examination in Public into the Core Strategy, he noted that student housing needs are not addressed in the Core Strategy or in the Housing Needs Survey and referred to that as "an important omission".	Noted, and as a result, the need for student accommodation was specifically considered in the SHMA.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 2, para 12.2	The standard model obligation should be available as part of this SPD and therefore consultation should only take place once this SPD is complete.	Not accepted. The draft unilateral agreement will reflect the contents of the SPD and is not an essential part of this consultation exercise.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 3, para 2.1	SCC is not the only education provider	It is acknowledged that Surrey County Council is not the only education provider. However the tariffs are based entirely on the provision of compulsory education (up to the age of 16). It does not cover further and higher education.	Part 3, para 2.1 amended to reflect comment

22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 3, para 2.9	This section should include Higher and further education	Not accepted. Contributions are only being sought for compulsory education (i.e. that provided by the Education Authority). The Council cannot ask for contributions towards every type of infrastructure - only that which is linked directly to the development being carried out.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 3, General	It is not clear whether the "base costs/information", leading to these figures, relate to the Epsom and Ewell area, rather than the whole of Surrey.	The EEBC tariffs are based on local data. The Surrey County Council charges relate to Surrey data. Although the Council will seek to apply the tariffs in a consistent way, it will not adopt a blanket approach.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 3, para 6.9	Student accommodation should be exempted from all the types of open space listed in this table.	Not accepted. Students are exempted from contributions for children's open space but will have an impact on the other forms of infrastructure which will need to be mitigated	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Part 3, General	Please note, however, that the University College feels purpose-built student residential accommodation should not be required to make "developer contributions"	Noted, although students will have an impact on infrastructure.	No change
22	John Sharkey & Co	On behalf of the University College for the Creative Arts (UCCA)	Appendix F	On purpose-built student residential accommodation, this will be one person for each bedroom.	Although the Council will seek to apply the tariffs in a consistent way, it is open to a developer to raise any particular issues at pre-application discussions when there is a clear identifiable variation in the impacts of the development.	Part 1, para 7.3 amended to clarify the application of the tariffs
23	Mr P Manning	G L Hearn on behalf of Tesco	Part 1, sec 8	Clarification is sought on the content of the table.	Clarification is provided in greater detail in Section 3 of the SPD. The table provided in section 1 is just a summary.	Clarification added to Part 1, para 8.11
23	Mr P Manning	G L Hearn on behalf of Tesco	Part 1, sec 8	It is very unlikely that a 1 bed flat or studio would create any child yield and would add to any perceived strain on education or on children's play space. These should be added to the exemptions. Additionally such units should be exempt from children's and young people's play space contributions	Studio flats are exempt as the occupancy table starts at 1 bedroomed dwellings. The pupil yield for dwellings with lower numbers of bedrooms is increasing and therefore contribute to the cumulative effect of other developments in the area.	No change
23	Mr P Manning	G L Hearn on behalf of Tesco	Part 1, sec 8	There is no requirement for a contribution to libraries from commercial developments so this should be added to the exemptions	Additional workers created by development may use the facilities mentioned, although some to a lesser degree. It is accepted that this requirement can be removed.	Document amended to reflect comment.
23	Mr P Manning	G L Hearn on behalf of Tesco	Part 1, sec 8	Need to consider that some developments will include environmental improvements within their development	The tariff system is based on the impact of the additional population generated by the development. The contribution is to mitigate impacts on the wider environment. Although the Council will seek to apply the tariffs in a consistent manner, a blanket approach will not be adopted.	No change
23	Mr P Manning	G L Hearn on behalf of Tesco	Part 1, sec 8	Commercial development should be exempt from contributions towards community centres because they do not bring added pressures	Employees of commercial development may use local community facilities; however it is reasonable to assume that the demand will be limited. It is suggested that commercial development is exempted, as in the case of libraries.	Document amended to reflect comment.
23	Mr P Manning	G L Hearn on behalf of Tesco	Part 1, sec 8	The table does not specify how the council counts additional workers. This should be clarified. Consideration needs to be given to part time workers/ job changes within the Borough.	The number of workers generated by a new commercial development is calculated based on worker floorspace ratios. This is the method that will be used to assess the financial contributions.	No change
23	Mr P Manning	G L Hearn on behalf of Tesco	Part 3, sec 2	There should be no contribution towards education from studio units or 1 bed flats	Studio flats are exempt as the occupancy table starts at 1 bedroomed dwellings. The pupil yield for dwellings with lower numbers of bedrooms is increasing and therefore contribute to the cumulative effect of other developments in the area.	No change
23	Mr P Manning	G L Hearn on behalf of Tesco	Part 3, sec 2	The Council should split the yield ratios between private and affordable as there is often a marked difference.	Noted, although the Council places a high priority on delivering affordable housing. To demonstrate this, socially rented affordable units are now exempt from the tariff.	No change
23	Mr P Manning	G L Hearn on behalf of Tesco	Part 3, sec 3	Need clarification if the transport contributions refer to residents and workers, and which workers. Consideration should be given to highly sustainable linked trips which discourage travel to destinations further away, in negotiations	The tariff applies to all workers & residents equally, unless it can be demonstrated by the applicant that there are particular local circumstances which warrant a different approach.	Part 1, para 7.3 amended to clarify the application of the tariffs
23	Mr P Manning	G L Hearn on behalf of Tesco	Part 3, sec 4	There is no/ very little requirement for commercial development to contribute towards libraries	Additional workers created by development may use the facilities mentioned, although some to a lesser degree. It is accepted that this requirement can be removed.	Document amended to reflect comment.
23	Mr P Manning	G L Hearn on behalf of Tesco	Part 3, sec 7	This requirement should be considered on a scheme by scheme basis as development, if designed well will enhance the public realm.	All development should be well designed and should enhance the public realm. This charge is to help offset and mitigate the wider impacts of the increase in population on the environment of the public realm.	No change

23	Mr P Manning	G L Hearn on behalf of Tesco	Part 3, sec 7	The formulae for calculating this contribution are vague. Clarification is needed with regard mixed developments	This figure represents the aggregation of £250 for environmental enhancements in the vicinity of the development and the same sum for use in Epsom Town Centre which contains services used by the whole community. It is a reasonable estimate based upon the typical cost of enhancement schemes. The SPD does not seek to address every type of development and particularly with larger schemes the level of contribution is likely to be subject to negotiation.	No change
24	Mr K Lipinski	Millgate Homes	General	The approach is fundamentally flawed and contrary to circular 05/05 as tariff requirements are unreasonable and not directly related to the proposed development	Not accepted. The principles for seeking planning contributions are set out in policies CS4, CS9 and CS12 and the SPD provides further guidance in line with Circular 05/05 and recent (2006) Audit Commission advice. The formulae and charges only apply to those types of function or service where there is a clear deficit and long term failure to increase provision in line with population increases. The levels of charge are set only at that required to match new provision for the new population, and not to rectify past under provision.	No change
24	Mr K Lipinski	Millgate Homes	General	The contributions are based on an increase in the number of people generated by new housing but argue that any new housing will not result in an increase in population as it will be required to meet existing housing need from a natural population growth.	There is a steady increase in the population moving into the South East, hence the requirement for increased housing figures as indicated in the emerging South East Plan. According to the ONS predictions, the population of Epsom and Ewell is projected to rise by 2.1 thousand from 2006 by 2011 (a 2.9% rise) and 4.3 thousand by 2016 (5.9% rise). Using the Chelmer Housing model (which incorporates housing development data including building and demolition rates) the population of Epsom and Ewell Borough is projected to rise by 2.7 thousand from 2006 by 2011 and 4.3 thousand by 2016.	No change
24	Mr K Lipinski	Millgate Homes	General	Reference must be made to the periodic review of how contributions are calculated & not just raise the contribution on an annual basis without proper regard to the necessity	Technical and cost information will be updated on an annual basis. While it is accepted that the cost of providing for particular contributions may deviate from the RPI in the short term, it is considered that there is longer term correction and the use of a single index offers the merits of simplicity. A full review of the SPD will commence in two years.	Part 1, para 2.2 amended to clarify the intention to review / update the SPD
24	Mr K Lipinski	Millgate Homes	General	When developers acquire sites they take into account sec 106 payments at the time of entering into contract & if the contract is entered into some time before the introduction of this system, the extra costs incurred can make the development unviable. A proviso will need to be introduced which allows for non-payment in these cases.	This will be taken into account. The open book approach will help ensure developments remain viable. The Council has publicised its intention to implement the tariff from June 2008.	No change
24	Mr K Lipinski	Millgate Homes	Part 1, para 4.2	Makes reference to 'the maintenance of benefits' which is not strictly correct as it is limited under Par B18 of Circular 05/2005. Para should be amended	Contributions will be spent in accordance with Circular 05/05: maintenance payments will only be sought where the provision of the facilities are predominantly for the benefit of the users of the associated development, or for an initial 'pump priming' period for those intended for wider public use.	No change
24	Mr K Lipinski	Millgate Homes	Part 1, para 8.4	Support willingness to take account of possible effect on viability. However, it is only acceptable if all development costs are taken into account in any open book valuation.	Noted.	No change
24	Mr K Lipinski	Millgate Homes	Part 1, para 8.9	The logic in this is incorrect as the Council is linking new housing growth to population growth which in this Borough is not the case (ref to Borough Profile). The provision of new housing is not the cause of the problem associated with increased pressure on infrastructure, it is a response to a natural increase in population and reduction in household size.	There is a steady increase in the population moving into the South East. According to the ONS predictions, the population of Epsom and Ewell is projected to rise by 2.1 thousand from 2006 by 2011 (a 2.9% rise) and 4.3 thousand by 2016 (5.9% rise). Using the Chelmer Housing model (which incorporates housing development data including building and demolition rates) the population of Epsom and Ewell Borough is projected to rise by 2.7 thousand from 2006 by 2011 and 4.3 thousand by 2016. Any individual site circumstances would be specific and difficult to measure. It would not be possible to establish a fair and consistent means of dealing with these forms of application. The SPD suggests a discount for what was previously existing on site.	No change
24	Mr K Lipinski	Millgate Homes	Part 3, sec 2	New housing will not result in population increase (due to natural increase as discussed above) and therefore the education tariff will be used for dealing with past or existing deficiencies not deficiencies that arise from new development.	As above. The contributions will be spent in accordance with Circular 05/05	No change
24	Mr K Lipinski	Millgate Homes	Part 1, para 9.6	This should have been provided as part of the SPD consultation as there are a number of uncertainties	Not accepted. The draft unilateral agreement will reflect the contents of the SPD and is not an essential part of this consultation exercise.	No change

24	Mr K Lipinski	Millgate Homes	Part 1	No reference anywhere to the definition of 'commencement' or to alternative payment dates which is important as it effects cash flow. Money will be going into a general pot to carry out general work rather than site specific, therefore there will not be the usual urgency to obtain the payments prior to commencement, apart from the Council earning interest on unspent contributions. Ref needs to be made in the SPD or model agreement that alternative payment dates would be acceptable	It is stated in the document that contributions will normally become payable on commencement of the development, unless an alternative phasing is agreed.	No change
24	Mr K Lipinski	Millgate Homes	General	There is no reference to the return of any unspent funds. It should be made clear that that if contributions are unspent within a set period (7 years max) the money plus interest will be returned to make the tariff system credible. If the money is not used and not returned this would be tantamount to theft.	It is reasonable if the money was never to be spent for there to be a repayment. However, it should be recognised that pooled contributions are often towards long term projects and therefore such a 'return' of monies should only come into effect after a longer period.	Part 1, 9.13 revised to reflect comment
24	Mr K Lipinski	Millgate Homes	Part 1, para 9.11	The 5% monitoring charge is totally unreasonable and unnecessary. It is an additional 106 which is not permitted under the regs. The fact that other Surrey Authorities have the same does not make it right.	Circular 05/05 states that it is for LPAs to decide which matters to address through standard charges and formulae (B33). The intention is that the money will be used to fund officer time to specifically to track, manage and review progress with legal agreements and developer contributions. This is in line with practice elsewhere. This approach will help ensure transparency in the process and support the objective of achieving full accountability in the spending of monies received. The charge will also be used to develop and refresh spending programmes and update and amend the figures. These tasks are not currently undertaken by the Council and the number of developer contributions will increase, thereby demanding more Council resources.	
24	Mr K Lipinski	Millgate Homes	Part 1, para 9.11	The monitoring fee should be recharged to the Council departments who are benefiting from the payments	Not agreed. The Council is ensuring that community infrastructure keeps pace with development.	
24	Mr K Lipinski	Millgate Homes	Part 2, para 5.3	This is contrary to normal convention where rounding down occurs in numbers less than 0.5 and rounding up occurs on 0.5 and above. The paragraph should be deleted or reworded so that a choice can be given where the part of the dwelling is 0.5 or above to either pay a sum in lieu or provide an additional dwelling and if less than 0.5 there should be no requirement to pay in lieu or provide a unit.	Do not accept that there is a "normal convention" in these sorts of cases. This approach is fair and equitable and is a reasonable interpretation of the policy contained in the Core Strategy. If necessary a developer may choose to round up the figure to provide an additional affordable unit.	No change
24	Krzysz Lipinski	Millgate Homes	Section 6	This section is unclear		
24	Mr K Lipinski	Millgate Homes	Part 2, sec 6	If a payment in lieu is to be made, using the example in the SPD, the commuted sum should be based on the 40% not provided on the facilitating site, not some additional affordable housing on a theoretical alternative site.	Not accepted. In order to meet Core Strategy Policy CS9 it is necessary to meet the affordability ratio set out in the policy. The SPD sets out a full explanation of how the number of dwellings off-site (or payment in lieu) is to be calculated.	No change
24	Mr K Lipinski	Millgate Homes	Appendix C	The proposed payments in lieu in appendix C are excessive & should at the very least be reduced to take account of any other subsidy such as from the Housing Corporation	The Housing Corporation consider that grant has historically been used to inflate land values and will no longer be used to do so. It therefore cannot be assumed that grant will always be available. Liaising with an RSL early on in the process will enable a developer to be appraised of the current climate regarding grant. It should also be noted that the Housing Corporation are tightening up the allocation of grant to RSL's to purchase units which developers have built and are unable to sell, such that units not meeting the Housing Quality Indicators or at least Level 3 of the Code for Sustainable Homes are unlikely to be funded. It is suggested that developers should appraise themselves of both of these sets of guidance given the current housing market.	No change
24	Mr K Lipinski	Millgate Homes	Part 3	Object to no reduction in other infrastructure contributions where affordable housing is provided. Should be consistent with other Surrey Authorities.	To reflect the priority the Council places on delivering affordable housing, social rented units will now be exempt from the tariff.	Part 1, para 8.11 amended to reflect response to comment
24	Mr K Lipinski	Millgate Homes	Part 3, sec 2	The education tariff should be based on an assumed number of children not on any additional person. Using the Council's occupancy rates it is highly likely that one of the occupants will be an adult and at a very minimum the contribution should reduce by £2699 per dwelling.	The education tariff figures have been calculated so that the same average contribution would be obtained through the S106 education formula or through the tariff. The education formula is based on pupil yield, but the tariff uses occupancy. The education tariff does not specify that occupancy means occupancy by a particular person, be it adult or child, but provides a figure that can be related to the occupancy of a dwelling. The actual yield for dwellings are fractions of a child, so there is no value in postulating that the subtraction of 1 adult from each occupancy figure would make a difference.	No change

24	Mr K Lipinski	Millgate Homes	Part 3, sec 3	Object to principle of transport tariff for reasons above and contribution should only be paid where a new development has a specific impact on the highway network.	If it can be demonstrated that a development would not have a specific impact on the highway network then an exemption could be negotiated in a specific case. However, the tariff has been calculated to ensure that the cumulative impact of development will be mitigated.	No change
24	Mr K Lipinski	Millgate Homes	Part 3, sec 3	The transport tariff should be based on average car ownership not on number of occupants in the property.	The tariff is based on the impact on the transport infrastructure	No change
24	Mr K Lipinski	Millgate Homes	Part 3, sec 3	The Council and County Council are going beyond the tests of 05/2005. Unreasonable for a developer to pay additional contribution over any access or highway improvements directly related to the development.	Not accepted. The tariff has been calculated to ensure that the cumulative impacts of developments will be mitigated, which is in accordance with the Circular.	No change
24	Mr K Lipinski	Millgate Homes	Part 3, sec 3	It is a disincentive to provide a travel plan	Not accepted. The Travel Plan may not cover the matters which are covered by the tariff. Travel Plans are very rarely provided on smaller sites below the scale of Transport Assessment/Statement	No change
24	Mr K Lipinski	Millgate Homes	Part 3, sec 3	Should be re-worded so there is no additional highway tariff to be paid if costs are incurred by a travel plan or specific highway measures have to be introduced to make a scheme acceptable on a highways ground in the first place.	The tariff will not normally be applied to those developments subject of a Transport Statement or Appraisal. This is the method through which most additional transport infrastructure and services are provided. This can be clarified in the text of the SPD.	Part 1, para 7.3 amended to clarify the application of the tariffs
24	Mr K Lipinski	Millgate Homes	Part 3, sec 3	Support 30% discount for town centre, but object to 30% penalty outside town centre	No reason is given for this objection. The 30% reduction and 30% increase were considered to be an equitable method of dividing the total responsibility to pay for the mitigation of the impact of the overall levels of development. The additional charge provides a worthwhile differentiation between out of town sites and town centre sites. Bus services are at their most viable in town centres, with operations becoming more marginal in the outer areas. There is therefore justification for charging more in areas away from the town centres.	No change
24	Mr K Lipinski	Millgate Homes	Part 1, para 2.2	The gov 2% target inflation rate should apply	It is considered appropriate to use the Retail Price Index as an anchor for the tariff levels	Part 1, para 2.2 amended to clarify the intention to review / update the SPD
24	Mr K Lipinski	Millgate Homes	Part 3, sec 6	Reject tariff as it is based on an increase in population due to new housing developments, when the population is set to rise irrespective of the number of houses to be built.	Argument not accepted. The tariff system is soundly based on the cost of mitigating the increase in population reasonably attributable to a proposed development.	No change
24	Mr K Lipinski	Millgate Homes	Part 3, sec 6	Contrary to para B19 05/05 as recreation facilities tend to be for the wider community not just residents of the development.	Noted. The contributions are to mitigate additional pressure placed on open space by population generated by new development, not for general upkeep of existing spaces. The requirements of Circular 2005/05 are clear and will be met. The Council will ensure that funds received from this tariff for maintenance are directed towards the appropriate schemes. This will be monitored. As specified in Circular 05/05 maintenance payments will only be sought where the provision of the facilities are predominantly for the benefit of the users of the associated development, or for an initial 'pump priming' period for those intended for wider public use.	Part 3, para 6.7 amended to reflect this
24	Mr K Lipinski	Millgate Homes	Part 3, sec 6	Not clear as just an end figure and does not state if these figures include a maintenance sum.	The figure is based on the average cost of provision of the individual typologies of open space	No change
24	Mr K Lipinski	Millgate Homes	Part 3, sec 6	The whole recreation tariff is flawed as it assumes a recreation deficiency in all areas. Should only be sought if there are deficiencies.	This is not the case. The tariff does not assume a recreational deficiency in all areas. The tariff covers qualitative as well as quantitative deficiencies. The Council has a recent Open Space study which has assessed provision and quality, and on which the tariffs have been based. This also formed the basis of the justification for the recreation policies in the Core Strategy. The tariff is based on the additional demand placed on the existing facilities from the additional population generated by the development.	No change
24	Mr K Lipinski	Millgate Homes	Part 3, sec 7	This whole tariff is unreasonable and should be deleted completely.	This figure represents the aggregation of £250 for environmental enhancements in the vicinity of the development and the same sum for use in Epsom Town Centre which contains services used by the whole community. It is a reasonable estimate based upon the typical cost of enhancement schemes and is designed to mitigate the impact of the new development on the environment as a result of the increased population generated.	No change
24	Mr K Lipinski	Millgate Homes	Part 3, sec 7	It is based on the assumption that all development is harmful rather than identifying whether a particular development has a specific effect on the local environment	The tariff is to account for the increased pressure a development will have on the wider environment due to the impact of additional population.	Part 3, para 7.4 amended to reflect comment

24	Mr K Lipinski	Millgate Homes	Part 3, sec 7	Contributions should be sought for projects which are directly related to a development (Developments outside ETC and CA shouldn't have to contribute to these areas)	It is agreed that developments outside Conservation Areas should not generally be expected to fund works within them. However in view of the importance of Epsom town centre generally for residents of the Borough, it is considered that expenditure there can be funded by development in other locations within the Borough.	Part 3, para 7.5 to reflect comment
24	Mr K Lipinski	Millgate Homes	Part 3, sec 7	If the Council wants to spend money on CCTV/trees/ street furniture/ cycle lanes this should come from the Council's own funds as they should already be providing them as they benefit the wider community and not just the new developments.	The tariff is designed to mitigate the cumulative impact of developments, which previously had not been required to contribute. It is inevitable that a facility in the public realm will be of benefit to a wider population, but the contribution will be used to mitigate the impact of the new development on the environment as a result of the increased population generated.	No change
24	Mr K Lipinski	Millgate Homes	Part 3, sec 7	The onus should be on the council to prove that the new development is the cause of the Council needing to carry out the environmental improvement works rather than an assumption.	The tariff is to account for the increased pressure a development will have on the wider environment due to the impact of additional population. Contributions are to mitigate the cumulative impact of development. It would not be practical for the Council to assess every application individually.	No change
24	Mr K Lipinski	Millgate Homes	Part 3, sec 7	If a development has a detrimental impact either physical or visual it should not be granted planning permission. Therefore if it is acceptable in planning terms there is no need to make any further 'financial contributions'	Not accepted. It is not the development itself that is being judged; it is the increase in population generated by the scheme, and the impact that will have on the quality and integrity of the environment over time.	No change
24	Krzys Lipinski	Millgate Homes	Part 3, sec 7	How can one ask for a contribution for perceived degradation? If a development results in degradation it should not be granted planning permission.	Text amended to remove the reference to perceived degradation. The contribution is to mitigate the impact of the new development on the environment as a result of the increased population generated.	Part 3, para 7.8 amended to reflect comment
24	Mr K Lipinski	Millgate Homes	Part 3, sec 7	There is no audit trail to say whether the environmental improvements were within budget or value for money or cost effective.	The Council operates a robust procurement protocol to ensure that value for money is achieved.	No change
25	Mr A Ransome	RPS on behalf of Fairview Homes	Part 2	Object to proposed affordable housing tenure split of 70% social rented and 30% intermediate. This should only be indicative and negotiable as they could affect the viability of the scheme. Request that stated in the text that tenure mix would be negotiated on a site by site basis, taking account of the sites viability.	It is stated that this is the Council's overall target and which doesn't imply that it would be required on every site.	No change
25	Mr A Ransome	RPS on behalf of Fairview Homes	Part 2	It is paramount that the application of in-lieu payments in respect of affordable housing that cannot be delivered on site, should be considered on a site by site basis.	The affordable / private housing split should be maintained as required by Core Strategy policy, unless viability becomes an issue in which case the developer has the opportunity to raise local and specific circumstances in the "open book" approach proposed in the SPD	No change
25	Mr A Ransome	RPS on behalf of Fairview Homes	Appendix C	Object to formula set out in Appendix C- too rigid, not in line with PPS3 or 05/05	The formula in Appendix C reflect the realistic costs of providing affordable housing	No change
25	Mr A Ransome	RPS on behalf of Fairview Homes	Part 2	Unjustifiable to stipulate mix of affordable unit sizes and should be negotiated on a site by site basis	The Council encourages applicants to discuss schemes with the Council. There is no rigid stipulation of mix on a site by site basis.	No change

25	Mr A Ransome	RPS on behalf of Fairview Homes	Part 2	Consider the principle of integrating affordable housing with market housing to be a good idea in principle but such a policy is flawed. HAS require rented units and intermediate units to remain separate with each having own access and communal areas. This is due to management, service charges and legalities. Can also have detrimental effects on market values. Small clusters of affordable units throughout site are inappropriate.	Noted. However there are a number of schemes nationally where communal areas are shared, particularly mixed tenure Extra Care schemes. In these cases any potential difficulties with splitting costs have been overcome. Increasingly RSL's do not insist that separate entrances and communal areas are essential. This highlights the importance for developers to seek pre application planning advice, to engage RSL's in the process as soon as possible, and to ensure that the affordable housing requirement is considered at the point of site appraisal and acquisition. This will help to ensure that where it is absolutely necessary, schemes can be designed to incorporate separate stairwells or entrances for the affordable element. The Housing Corporation website includes details of a number of schemes where market housing, shared ownership and rented housing are integrated on both general needs and extra care housing sites. With the aim of creating sustainable communities, the Council would not tend to agree that concerns over splitting the costs of service charges is a justified excuse for creating mono tenure hous	No change
25	Mr A Ransome	RPS on behalf of Fairview Homes	Part 3	Object to specific contributions from developments to: Education, Transport, libraries, healthcare, open space, public realm, community facilities. Recycling.	The tariff charges have been designed to mitigate the impact of the additional people generated by residential and commercial developments. They are based on the estimated impacts of an additional person, either living or working in Epsom and Ewell Borough. They do therefore relate specifically to new development and are commensurate with the potential impact. They provide clarity and certainty to what will be required of developers when developing locally. In some circumstances they will provide the basis for negotiation on a site by site basis, particularly if matters of development viability are raised. It is open to a developer to raise any specific local circumstances which will be taken into account by the LPA. The document is in accord with Circular 05/2005 as confirmed by GOSE in their response.	Part 1, para 7.3 amended to clarify the application of the tariffs
25	Mr A Ransome	RPS on behalf of Fairview Homes	Part 3	The Council should only use indicative targets and examples and should not state the required amounts as these will vary according to characteristics of individual developments. The figures stated should be used as maxima.	The tariff charges have been designed to mitigate the impact of the additional people generated by residential and commercial developments. They are based on the estimated impacts of an additional person, either living or working in Epsom and Ewell Borough. They do therefore relate specifically to new development and are commensurate with the potential impact. They provide clarity and certainty to what will be required of developers when developing locally. In some circumstances they will provide the basis for negotiation on a site by site basis, particularly if matters of development viability are raised. It is open to a developer to raise any specific local circumstances which will be taken into account by the LPA. The document is in accord with Circular 05/2005 as confirmed by GOSE in their response.	Part 1, para 7.3 amended to clarify the application of the tariffs

25	Mr A Ransome	RPS on behalf of Fairview Homes	Part 3	Request that it is made clear that contributions should be negotiated on a site-by-site basis.	The SPD provides clear guidance as to what is required on an individual site development. A tariff based approach to developer contributions has been supported by the South East Plan panel and by the Government Office for the South East in their response to this consultation. A tariff system works effectively if it provides a clear, consistent and straightforward approach to guiding developers as to the scale of contribution expected. The purpose of the SPD is to help avoid the need for site by site negotiation on the majority of individual development sites. Although the Council will seek to apply the tariffs in a consistent way, it will not adopt a blanket approach.	Part 1, para 7.3 amended to clarify the application of the tariffs
25	Mr A Ransome	RPS on behalf of Fairview Homes	Part 3	The list of obligations should not be used as a checklist (would contravene 05/05) and any contribution should be reasonable & relate specifically to the new development.	This is the basis on which the SPD has been prepared; any contribution should be reasonable and relate to the development proposed in line with the requirements of Circular 05/05	No change
25	Mr A Ransome	RPS on behalf of Fairview Homes	Part 3	Request that an additional paragraph is added on each of the topics that clearly states that these act as a guide to levels of contribution which MAY be sought by the council.	The tariff is designed to mitigate the cumulative impact of smaller scale developments. It would be unreasonable to expect these to be negotiated on a site by site basis. However, where appropriate contributions may be negotiated on a site by site basis, using the SPD tariffs as a guide.	Part 1, para 7.3 amended to clarify the application of the tariffs
25	Mr A Ransome	RPS on behalf of Fairview Homes	Part 3, sec 2	Object to the level of education contributions- each case should be assessed on its own merits.	The tariff charges have been designed to mitigate the impact of the additional people generated by residential development. The Council will seek to apply the tariffs in a consistent way but will not adopt a blanket approach. The education tariff figures have been calculated so that the same average contribution would be obtained through the S106 education formula previously used by Surrey County Council or through the tariff.	No change
25	Mr A Ransome	RPS on behalf of Fairview Homes	Part 3, sec 2	Smaller residential units may not result on the need for school places, therefore a developer should not have to make a contribution. It would prohibit positive developments coming forward that provide needed homes for first time buyers.	Studio flats are exempt as the occupancy table starts at 1 bedroomed dwellings. The pupil yield for dwellings with lower numbers of bedrooms is increasing and therefore contribute to the cumulative effect of other developments in the area.	No change
25	Mr A Ransome	RPS on behalf of Fairview Homes	Part 3, sec 2	Request amendment to state that contributions will only be sought where a demonstrable need arises, based on the merits and circumstances of each case.	The tariff charges have been designed to mitigate the impact of the additional people generated by residential development. The Council will seek to apply the tariffs in a consistent way but will not adopt a blanket approach. Due to the nature of development in Epsom & Ewell it would not be practical to negotiate in each and every case.	No change
26	Mr C Murithi	Environment Agency	General	Contributions can be sought from developers to mitigate the impacts of surface water run-off, maintenance of flood defences and other flood risk management infrastructure.	Impacts such as these will be dealt with through other forthcoming LDF documents	No change
26	Mr C Murithi	Environment Agency	General	Refers to PPS25, Annex G which states that: 'Authorities should include general policies in LDDs about the use of planning obligations for flood risk management'; 'authorities may wish to enter into an agreement under sec 106 to ensure that the developer carries out the necessary works and that future maintenance commitments are met'; 'it may be appropriate to vest the resulting flood risk management measures, which have been constructed with a dedicated commuted sum to fully fund whole life maintenance and future climate change adaptability costs'; '...should negotiate an appropriate contribution form the developer...'	The list of potential contributions in the SPD is not exhaustive. On larger schemes additional contributions may be required, and these will be assessed on a case by case basis. Further reference may be made in the Council's future SPD on design guidance.	Reference added to Part 1, para 7.3
26	Mr C Murithi	Environment Agency	General	Sustainability objective 5 should be expanded to include contributions towards SUDS and maintenance commitments	Noted. The list of contributions is not exhaustive. On larger schemes the SPD acknowledges that additional contributions may be required, which will be assessed on a case by case basis.	Part 1, para 7.3 amended to clarify the application of the tariffs
26	Mr C Murithi	Environment Agency	General	There is very little cross- referencing between the SPD and the SA report and further links need to be made between these two documents.	Noted. The sustainability appraisal has shaped the development of the SPD	No change
26	Mr C Murithi	Environment Agency	General	Councils should seek contributions from developers towards flood reduction measures such as green roofs and other surface water storage or infiltration.	Requirements such as these will be dealt with through other forthcoming LDF documents	No change
26	Mr C Murithi	Environment Agency	General	PPS25 Annex F. 'There may be circumstances where it is appropriate for infiltration attenuation storage to be provided outside the development site, if necessary through the use of a section 106 agreement.'	Noted. This is likely to be on larger sites, where negotiations may be conducted on a site by site basis	No change

26	Mr C Murithi	Environment Agency	General	SUDS should be included should be included in the SPD.	Requirements such as these will be dealt with through other forthcoming LDF documents	No change
26	Mr C Murithi	Environment Agency	General	Recommend that the status of the Boroughs watercourses in terms of their ecological status as set out within the Water Frameworks directive to be linked to the biodiversity and open space improvement.	Noted	No change
27	Mr D Bayliss	Rosebery	General	Welcome the production of the SPD for clarity about developer contributions required	Noted	No change
27	Mr D Bayliss	Rosebery	Part 2	Support the requirement for affordable housing on sites of 5+ or 0.15ha+	Noted, although strictly this was a policy matter confirmed in the Core Strategy	No change
27	Mr D Bayliss	Rosebery	Part 2	Welcome the emphasis on working with local RSLs early in the process	Noted	No change
27	Mr D Bayliss	Rosebery	Part 3	The Council should take into account that affordable housing providers develop & manage housing for local people who are already residents in the area, which means that their demand is not new to the area. Therefore affordable housing should be exempt from/ have reduced contributions towards: Education- Exempt due to no increased demand; Transport- Contributions should only be required if they are necessary to make a development acceptable (this should be clear in the Council's reasoning behind asking for two different levels of contributions); Libraries- Should be exempt or a reduced fee due to no increased demand created; Healthcare- Exempt due to no increased demand; Open space- Account should be taken of existing local open space provision & to the degree of private amenity space associated with new proposals.	The Council acknowledges that people on their housing register are already resident within the Borough. The Council intends to deal with this point by exempting social rented housing from the tariff. This will serve to enable the delivery of affordable housing in a competitive market.	Part 1, para 8.11 amended to reflect response to comment
27	Mr D Bayliss	Rosebery	Part 3	Do not agree with the requirements for smaller developments to pay contributions to be pooled and utilised to provide facilities elsewhere in the Borough- contrary to 05/05	Pooling of infrastructure provisions is an acceptable practice where development doesn't in itself justify a particular piece of infrastructure provision	No change
27	Mr D Bayliss	Rosebery	Part 3, sec 6	Affordable Housing should only provide for children's play areas if the dwelling is considered to be family accommodation.	Not accepted. In view of the fairly limited stock of affordable accommodation, there are circumstances when smaller flats are occupied by parents with young children.	No change
27	Mr D Bayliss	Rosebery	Part 3, sec 7	Contributions should be related in scale and kind and the level of quality of public realm varies throughout the Borough.	This figure represents the aggregation of £250 for environmental enhancements in the vicinity of the development and the same sum for use in Epsom Town Centre which contains services used by the whole community. It is a reasonable estimate based upon the typical cost of enhancement schemes. It would not be practical to assess the environmental quality in each and every case so a standard tariff is preferred.	No change
27	Mr D Bayliss	Rosebery	Recycling	Consider £60 is too high considering a proportion of Council Tax goes towards this.	Council tax payments support the collection and management of refuse, not the provision of the bins themselves	No change
28	Mr M Townsend	Barton Wilmore on behalf of Jockey Club Racecourses Ltd	General	Significant concerns that the draft SPD fails to meet the requirements of the Circular 05/05.	Circular 05/05 has provided the basis for the SPD. The Council is satisfied that the SPD is 05/05 compliant - a view supported by GOSE's response to this consultation.	No change
28	Mr M Townsend	Barton Wilmore on behalf of Jockey Club Racecourses Ltd	Part 1, para 2.2	SPD should specify at what period it will be updated/ reviewed	Agreed	Part 1, para 2.2 amended to clarify the intention to review / update the SPD
28	Mr M Townsend	Barton Wilmore on behalf of Jockey Club Racecourses Ltd	Part 1, para 4.2	This reference to 'other suitable sites' should be qualified by stating that any contributions for off-site works will be directed towards measures directly related to the development as required by Circular 05/05	Agreed.	Reference added to Part 1, para 4.2
28	Mr M Townsend	Barton Wilmore on behalf of Jockey Club Racecourses Ltd	Part 1, para 7.2	The Council should specify a reasonable period within which the pooled contributions should be spent- consider 5 years to be reasonable.	It is reasonable if the money was never to be spent for there to be a repayment. However, it should be recognised that pooled contributions are often towards long term projects and therefore such a 'return' of monies should only come into effect after a longer period.	Part 1, 9.13 revised to reflect comment
28	Mr M Townsend	Barton Wilmore on behalf of Jockey Club Racecourses Ltd	Part 1, para 8.4	Object to list of abnormal costs as difficult to identify at the outset. Recommend that the list is expanded and the wording altered.	It would be difficult to specify every type of 'abnormal cost' within the document. The SPD refers to "standard" costs. Abnormal costs are likely to be those which are not "standard".	No change
28	Mr M Townsend	Barton Wilmore on behalf of Jockey Club Racecourses Ltd	Part 1, para 8.13	This paragraph should include the words 'of the development' between the words 'impact' and 'beyond' to accord with 05/05	Agreed	Part 1, para 8.13 amended

28	Mr M Townsend	Barton Wilmore on behalf of Jockey Club Racecourses Ltd	Part 1, sec 9	The document should include further details of the likely costs incurred by the Council in preparing and completing a sec 106 agreement	The legal charge will be absorbed within the admin fee which is now stated in the document.	Part 1, para 9.3 & 9.6 amended to remove the requirement for a legal charge in every case
28	Mr M Townsend	Barton Wilmore on behalf of Jockey Club Racecourses Ltd	Part 1, sec 9	Object to 5% admin fee- is a standard function of the Council and doesn't meet ant tests of circular 05/05	Circular 05/05 states that it is for LPAs to decide which matters to address through standard charges and formulae (B33). The intention is that the money will be used to fund officer time to specifically to track, manage and review progress with legal agreements and developer contributions. This is in line with practice elsewhere. This approach will help ensure transparency in the process and support the objective of achieving full accountability in the spending of monies received. The charge will also be used to develop and refresh spending programmes and update and amend the figures. These tasks are not currently undertaken by the Council and the number of developer contributions will increase, thereby demanding more Council resources.	
28	Mr M Townsend	Barton Wilmore on behalf of Jockey Club Racecourses Ltd	Part 3, sec 1	The increase in commercial floorspace figures do not take into account increases in floor area where this doesn't generate additional worker population such as storage areas. The wording of the SPD should be amended to show this and to accord with 05/05 (scale and kind)	The worker-floorspace ratios are based on an average occupation at the study date and include an allowance for storage areas.	No change
28	Mr M Townsend	Barton Wilmore on behalf of Jockey Club Racecourses Ltd	Part 3, sec 3	The 30% differential should not only be limited to the locations listed in the SPD but should be an incentive for all development where it can be demonstrated that the location is sustainable and good links to public transport and non car transport.	In the context of Epsom and Ewell the areas defined in the SPD are the areas where the Council considers there is particularly good access to public transport. It would be open to a developer to provide evidence in negotiation which demonstrates high equivalent levels of sustainability. The definition of the town and local centre boundaries will be reviewed in two years time, in the light of work on the Site Allocations and Development Control Policies DPD.	Part 1, para 7.3 amended to clarify the application of the tariffs
28	Mr M Townsend	Barton Wilmore on behalf of Jockey Club Racecourses Ltd	Part 3, sec 3	Where it can be demonstrated that development could reduce travel currently undertaken by car, a reduction of more than 30% may be appropriate.	Should a developer provide evidence in negotiation which demonstrates high equivalent levels of sustainability, this would be taken into account by the LPA.	Part 1, para 7.3 amended to clarify the application of the tariffs
28	Mr M Townsend	Barton Wilmore on behalf of Jockey Club Racecourses Ltd	Part 3, sec 4	If justification can be provided to demonstrate a need for the contribution related to commercial/ leisure development is less intensive than by residential development then this should be reflected in the level of contributions.	Commercial development is exempt from a number of the tariffs to reflect the less intensive use of infrastructure	No change
28	Mr M Townsend	Barton Wilmore on behalf of Jockey Club Racecourses Ltd	Part 3, sec 6	The increase in use of such facilities in relation to commercial facilities is unclear. Question whether contributions can 'reasonably' be required. The use of these facilities will be considerably lower from commercial developments. Need to ensure the contributions required are fairly and reasonably related to the scale and kind.	Agreed	Part 3, para 6.9 amended to reflect comment
28	Mr M Townsend	Barton Wilmore on behalf of Jockey Club Racecourses Ltd	Part 3, sec 7	The SPD should recognise that in some instances a well designed positive development could improve the public realm far beyond the improvements made through the collection of contributions.	The tariff is to account for the increased pressure a development will have on the wider environment due to the impact of additional population.	Part 3, para 7.4 amended to reflect comment
28	Mr M Townsend	Barton Wilmore on behalf of Jockey Club Racecourses Ltd	Part 3, sec 7	A development may also improve the security of an area or landscape and this should be made reference to.	Noted, although this is too specific for the SPD to refer to	No change
28	Mr M Townsend	Barton Wilmore on behalf of Jockey Club Racecourses Ltd	Part 3, sec 8	If justification can be provided to demonstrate a need for the contribution related to commercial/ leisure development as less intensive than by residential development then this should be reflected in the level of contributions.	Although the Council will seek to apply the tariffs in a consistent way, it is open to a developer to raise any particular issues at pre-application discussions when there is a clear identifiable variation in the impacts of the development.	No change

29	Ms M Jasper, Barton Wilmore	Barton Wilmore on behalf of Segro PLC	Para 2.2	SPD should specify at what period it will be updated/ reviewed	Agreed	Part 1, para 2.2 amended to clarify the intention to review / update the SPD
29	Marie Jasper, Barton Wilmore	Barton Wilmore on behalf of Segro PLC	Part 1, sec 4 Para 4.2	This reference to 'other suitable sites' should be qualified by stating that any contributions for off-site works will be directed towards measures directly related to the development as required by Circular 05/05	Agreed.	Reference added to Part 1, para 4.2
29	Marie Jasper, Barton Wilmore	Barton Wilmore on behalf of Segro PLC	Part 1, sec 7 Para 7.2	The Council should specify a reasonable period within which the pooled contributions should be spent- consider 5 years to be reasonable.	It is reasonable if the money was never to be spent for there to be a repayment. However, it should be recognised that pooled contributions are often towards long term projects and therefore such a 'return' of monies should only come into effect after a longer period.	Part 1, 9.13 revised to reflect comment
29	Marie Jasper, Barton Wilmore	Barton Wilmore on behalf of Segro PLC	Para 8.5	Suggest the inclusion of the words 'where appropriate' after 'priorities' as affordable housing will not always be relevant.	Agreed	Part 1, para 8.5 amended
29	Marie Jasper, Barton Wilmore	Barton Wilmore on behalf of Segro PLC	Para 8.13	This paragraph should include the words 'of the development' between the words 'impact' and 'beyond' to accord with 05/05	Agreed	Part 1, para 8.13 amended
29	Marie Jasper, Barton Wilmore	Barton Wilmore on behalf of Segro PLC	Part 1, sec 9	The document should include further details of the likely costs incurred by the Council in preparing and completing a sec 106 agreement	The Council consider that the legal charge will be absorbed by the admin fee (although reserve the right to charge for legal costs should applicants wish to materially change the standardised template)	Part 1, para 9.3 & 9.6 amended to remove the requirement for a legal charge in every case
29	Marie Jasper, Barton Wilmore	Barton Wilmore on behalf of Segro PLC		Object to 5% admin fee- is a standard function of the Council and doesn't meet ant tests of circular 05/05	Circular 05/05 states that it is for LPAs to decide which matters to address through standard charges and formulae (B33). The intention is that the money will be used to fund officer time to specifically to track, manage and review progress with legal agreements and developer contributions. This is in line with practice elsewhere. This approach will help ensure transparency in the process and support the objective of achieving full accountability in the spending of monies received. The charge will also be used to develop and refresh spending programmes and update and amend the figures. These tasks are not currently undertaken by the Council and the number of developer contributions will increase, thereby demanding more Council resources.	No change
29	Marie Jasper, Barton Wilmore	Barton Wilmore on behalf of Segro PLC	Part 3, sec 1	The increase in commercial floorspace figures do not take into account increases in floor area where this doesn't generate additional worker population such as storage areas. The wording of the SPD should be amended to show this and to accord with 05/05 (scale and kind)	The worker-floorspace ratios are based on an average occupation at the study date and include an allowance for storage areas.	No change
29	Marie Jasper, Barton Wilmore	Barton Wilmore on behalf of Segro PLC	Part 3 sec 3 para 3.4	The 30% differential should not only be limited to the locations listed in the SPD but should be an incentive for all development where it can be demonstrated that the location is sustainable and good links to public transport and non car transport.	In the context of Epsom and Ewell the areas defined in the SPD are the areas where the Council considers there is particularly good access to public transport. It would be open to a developer to provide evidence in negotiation which demonstrates high equivalent levels of sustainability. The definition of the town and local centre boundaries will be reviewed in two years time, in the light of work on the Site Allocations and Development Control Policies DPD.	Part 1, para 7.3 amended to clarify the application of the tariffs
29	Marie Jasper, Barton Wilmore	Barton Wilmore on behalf of Segro PLC	Part 3 sec 3 para 3.5	Where it can be demonstrated that development could reduce travel currently undertaken by car, a reduction of more than 30% may be appropriate.	Should a developer provide evidence in negotiation which demonstrates high equivalent levels of sustainability, this would be taken into account by the LPA.	Part 1, para 7.3 amended to clarify the application of the tariffs
29	Marie Jasper, Barton Wilmore	Barton Wilmore on behalf of Segro PLC	Part 3 sec 4	The indiscriminate application of this tariff does not allow for the scale and kind of development to be taken into account. The SPD should recognise the different levels of demand generated by different development and vary the tariff accordingly (lower tariff for working population)	The tariff is not applied indiscriminately but is related to occupancy. Variations have been accounted for, for example through exempting commercial development from this charge.	No change
29	Marie Jasper, Barton Wilmore	Barton Wilmore on behalf of Segro PLC	Part 3, sec 6	The increase in use of such facilities in relation to commercial facilities is unclear. Question whether contributions can 'reasonably' be required. The use of these facilities will be considerably lower from commercial developments. Need to ensure the contributions required are fairly and reasonably related to the scale and kind.	Agreed	Part 3, para 6.9 amended to reflect comment
29	Marie Jasper, Barton Wilmore	Barton Wilmore on behalf of Segro PLC	Part 3, sec 7	The SPD should recognise that in some instances a well designed positive development could improve the public realm far beyond the improvements made through the collection of contributions.	The tariff is to account for the increased pressure a development will have on the wider environment due to the impact of additional population.	Part 3, para 7.4 amended to reflect comment

29	Marie Jasper, Barton Wilmore	Barton Wilmore on behalf of Segro PLC	Part 3, sec 7	A development may also improve the security of an area or landscape and this should be made reference to.	Noted, although this is too specific for the SPD to refer to	No change
29	Marie Jasper, Barton Wilmore	Barton Wilmore on behalf of Segro PLC	Part 3, sec 8	If justification can be provided to demonstrate a need for the contribution related to commercial/ leisure development as less intensive than by residential development then this should be reflected in the level of contributions.	Although the Council will seek to apply the tariffs in a consistent way, it is open to a developer to raise any particular issues at pre-application discussions when there is a clear identifiable variation in the impacts of the development.	No change
30	Ms E Rubin	DP9 on behalf of Linc Epsom	Part 1, para 8.2 & 8.3	Welcome transparency but any tariffs should be treated as guidance to be applied on a flexible/ case by case basis so as to not jeopardise the viability of a proposed development.	The tariff is designed to mitigate the cumulative impact of developments. It would be unreasonable to expect these to be negotiated on a site by site basis however should there be specific issues of viability it will be open to developers to explain the circumstances and reasons why the contributions should be different, in accordance with the open book approach.	No change
30	Ms E Rubin	DP9 on behalf of Linc Epsom	Part1, para 8.3	Agree that any financial information disclosed to the Council should be treated confidentially by the Council	Noted	No change
30	Ms E Rubin	DP9 on behalf of Linc Epsom	Part 1, para 8.11	There should be further scope to negotiate on the applicability of the types of contributions in the table depending on the nature of individual schemes	The tariff is designed to mitigate the cumulative impact of smaller scale developments. It would be unreasonable to expect the level of contributions to be negotiated in every case. The Council will seek to apply the tariffs in a consistent way, but will not adopt a blanket approach. With larger residential schemes, where scope may exist for the on site provision of some infrastructure, the level and type of contributions is likely to be subject to negotiation.	Part 1, para 7.3 amended to clarify the application of the tariffs
30	Ms E Rubin	DP9 on behalf of Linc Epsom	Part 1, para 9.8 to 9.10	(8-13 week deadlines) This approach has the potential to be highly detrimental to the progress of development within the Borough. It may hold developers to 'ransom' by enforcing a deadline before negotiations are complete, and could lead to the premature completion of sec 106 agreements.	The paragraph represents a clear intention by the Council to ensure that development makes the commitment to the appropriate contribution to infrastructure provision. It is not the intention to frustrate development or to devalue the process of negotiation. Should there be particular circumstances which make it impossible for negotiations to be satisfactorily concluded, these will be taken into account by the LPA.	No change
30	Ms E Rubin	DP9 on behalf of Linc Epsom	Part 2, Para 4.4	The AH 20% and 40% should be treated as guidelines not minimum requirements	This policy is set out within the Core Strategy	No change
30	Ms E Rubin	DP9 on behalf of Linc Epsom	Part 2, para 5.3	Support payment in lieu for part of an affordable unit. The developer should be allowed the choice of making payment in lieu or providing an additional unit on or off site. This should be negotiable based on viability and site-specific issues	This approach is acceptable. A developer could have the option of providing an affordable unit in lieu of financial provision for a part unit. This is referred to in Part 2, para 5.3	No change
30	Ms E Rubin	DP9 on behalf of Linc Epsom	Part 2, para 5.4 to 5.5	Support provision in SPD of locating Affordable Housing off-site where necessary. This should be negotiable on a site specific basis.	It is clearly stated in the Core Strategy that provision is to be made on site and that off site contributions will only be accepted in exceptional circumstances	No change
30	Ms E Rubin	DP9 on behalf of Linc Epsom	Part 2, para 5.7	Support provision of payments in lieu, which should be negotiable on a site specific basis.	Noted	No change
30	Ms E Rubin	DP9 on behalf of Linc Epsom	Part 3, para 3.9	Support that transport tariffs are lower in ETC.	Noted	No change
30	Ms E Rubin	DP9 on behalf of Linc Epsom	Part 3, para 6.9	Support proposal to limit open space contributions for certain proposed uses. There should be further scope to negotiate	Noted. The tariff is designed to mitigate the cumulative impact of developments. It may provide the basis for negotiation if particular local circumstances warrant a departure from them, although it would generally be unreasonable to expect these to be negotiated on a site by site basis in every case.	Part 1, para 7.3 amended to clarify the application of the tariffs
30	Ms E Rubin	DP9 on behalf of Linc Epsom	Part 3, para 7.4	Should not assume all development will degrade public open space, and should recognise that it can contribute positively to the environmental quality of both the site and the adjoining land. In such a case it would be inappropriate to expect contributions.	It is recognised that development can have a positive environmental impact, and that indeed is a primary driver of planning policy and design negotiation. However it is the impact of the population generated, rather than the development itself, that is being mitigated.	Part 3, para 7.8 amended to reflect comment
30	Ms E Rubin	DP9 on behalf of Linc Epsom	Part 3, para 7.5	The contribution should be negotiable based upon the scale of the impact in line with 05/05	The tariff is a starting point for negotiations on larger schemes but it is not practical for the Council to negotiate in each and every case where there is a demonstratable impact and the need for a contribution can thereby be clearly demonstrated.	Part 1, para 7.3 amended to clarify the application of the tariffs
30	Ms E Rubin	DP9 on behalf of Linc Epsom	Part 3, part 7.5	Development in Epsom Town Centre should not be expected to contribute to environmental improvements more than other locations since the improvements would benefit all residents in the entire borough.	Noted. However it is a standard tariff. Currently there is no additional requirement placed on developments within Epsom Town Centre.	No change
30	Ms E Rubin	DP9 on behalf of Linc Epsom	Appendix F	It is important that sound occupancy ratios are used.	Agreed. At this stage the Council proposes to use the average occupancy rates which are based on County Council data. The Council will re-evaluate this position when a review of the SPD is commenced.	Part 1, para 2.2 amended to clarify the intention to review / update the SPD

31	Mrs K Belcher	Woodcote Residents Society	General	In favour of the document	Noted	No change
31	Mrs K Belcher	Woodcote Residents Society	Appendix E	Typing error in table the total sheltered housing figures don't add up.	Agreed, however error relates to 5 and 1 - they should be 75 and 21 respectively	Appendix E amended
32	Mr T Murphy	CPRE Surrey, Epsom and Ewell Group	General	Support overall aims and mechanisms suggested in the SPD	Noted	No change
32	Mr T Murphy	CPRE Surrey, Epsom and Ewell Group	General	Support the pooling of contributions to provide off site infrastructure	Noted	No change
32	Mr T Murphy	CPRE Surrey, Epsom and Ewell Group	General	Unclear about the criteria that will be used by the council to decide how to allocate the funds. E.g. when open space is provided, what criteria would be used to determine how much funding should be devoted to biodiversity objectives? Suggest this information should be available when planning app goes to consultation and a material consideration in the decision making.	The spending of the contributions will be determined by the Councils in accordance with the requirements of Circular 05/05. Monies will be ring fenced and spent in accordance with the Circular and the individual agreements. Schemes will be identified through an established protocol with Surrey County Council and through the Council's own internal processes.	Part 1, 9.11 to 9.13 revised to clarify the monitoring and management of planning obligations
32	Mr T Murphy	CPRE Surrey, Epsom and Ewell Group	General	Unclear whether the infrastructure tariff applies to affordable housing	The Council intends to exempting social rented housing from the tariff. This will serve to enable the delivery of affordable housing in a competitive market.	No change
32	Mr T Murphy	CPRE Surrey, Epsom and Ewell Group	General	Unclear whether the contributions (appendix C) are to be index linked	These contributions will updated on a annual basis to reflect the funding gap experienced by RSLs	No change
32	Mr T Murphy	CPRE Surrey, Epsom and Ewell Group	General	Unclear how the sustainability objectives of the SA will be incorporated in decision making on the allocation of funds	Noted. The SA objectives will not be specifically incorporated in decision making and are not directly related to the allocation of funds. These are used to assess whether the SPD as a whole will help deliver the Council's sustainability objectives.	No change
32	Mr T Murphy	CPRE Surrey, Epsom and Ewell Group	General	Unsure why the St Ebbas development which is currently being planned doesn't meet the affordable housing criteria set out in the SPd (and the South East Plan)	Outline permission was granted prior to the adoption of the Core Strategy.	No change
33	Mrs K Chetwynd	Stamford Green Residents Association	General	Contributions should not be set at a level which means that homes are built to a lesser quality than they would otherwise be.	Agreed. The Council will encourage and expect good design, and will be publishing a Design Guidance SPD for public consultation purposes.	No change
33	Mrs K Chetwynd	Stamford Green Residents Association	General	The paper does not acknowledge the increasing pressure to reduce water and carbon emitting energy properly, and the contributions do not reflect and encourage this	Noted. This will be dealt with through other LDF documents	No change
33	Mrs K Chetwynd	Stamford Green Residents Association	General	The contributions should not be set such as to increase unduly the cost of new homes	Noted. The SPD does not seek a level of contributions that would jeopardise the viability of a proposed development.	No change
33	Mrs K Chetwynd	Stamford Green Residents Association	General	The implications for the Borough Council of the expertise and time required for this new system should not be ignored in the document	This is reflected in the 5% administration charge	No change
33	Mrs K Chetwynd	Stamford Green Residents Association	General	The system of spending the monies should be transparent, otherwise they could come into disrepute, and this needs to be dealt with more in the document.	Agreed. It is the intention to develop and improve our existing monitoring systems and publish annually the schedule of monies received / or committed and the progress towards securing the related infrastructure projects. It is the intention the admin fee will fund officer time to oversee this process.	Part 1, 9.11 to 9.13 revised to clarify the monitoring and management of planning obligations
33	Mrs K Chetwynd	Stamford Green Residents Association	General	What is the definition of 'development' that will be taxable? Concern over anomalies such as house conversions or granny flats to be undertaken for family members and not for profit.	The requirements for contributions will generally apply to all net increases in dwellings & increases of 100m2 in commercial floorspace.	No change
33	Mrs K Chetwynd	Stamford Green Residents Association	General	Support infrastructure contributions but feel the system seems to be a bit too close to tying planning consent with money (provided example of recent case in Drummond Gardens)	Decisions on planning applications should be made in accordance with the development plan, and other material planning considerations where relevant. Core Strategy policy CS12 is part of the development plan; the SPD provides a clear and consistent approach to calculating developer contributions in any one case.	No change
33	Mrs K Chetwynd	Stamford Green Residents Association	General	The affordable housing design requirements are praiseworthy. Concern over taking full account of past experiences which calls for commitment to long term very good management by all bodies.	Noted	No change

33	Mrs K Chetwynd	Stamford Green Residents Association	General	The 30% intermediate housing could in some cases be raised.	The Core strategy sets targets for the whole Borough over a 15 year period to 2022. The issue of whether 30% is the right figure for a particular site will depend on circumstances. This will be negotiated on a case by case basis. It is currently the case that the Borough suffers from a lack of affordable social rented housing and the Housing Service will continue to negotiate wherever possible for an increase in this supply.	No change
34	Ian Mawer	South East of England Development Agency (SEEDA)	General	General support (complements the Regional Economic Strategy on Affordable Housing/ transport/ recycling facilities)	Noted	No change
34	Ian Mawer	South East of England Development Agency (SEEDA)	General	Welcome the document stating that the council will not seek a level of contributions that would jeopardise the viability of a proposed development. This approach will ensure the delivery of development in the Borough	Noted	No change
34	Ian Mawer	South East of England Development Agency (SEEDA)	Sustainability Appraisal	Out of a total of 21 objectives, including only 3 economic objectives does not deliver a balanced appraisal.	The sustainability objectives were publicly consulted on before being adopted for use by a number of East Surrey local authorities. SEEDAs comments will be considered when these are to be updated. However, each SA objective is considered important	No change
34	Ian Mawer	South East of England Development Agency (SEEDA)	Sustainability Appraisal	Would welcome the inclusion of additional economic objectives (refer to the Guide to Sustainability Appraisal in the South East (Jan 06).	Noted	No change
34	Ian Mawer	South East of England Development Agency (SEEDA)	Sustainability Appraisal	Welcome SA objective 13	Noted	No change
34	Ian Mawer	South East of England Development Agency (SEEDA)	General	Would be useful for the SPD to require developments over a certain threshold to fund a local employment and training strategy to assist in tackling local skills shortages. This would complement Target 6 of the RES.	Noted. It is likely that contributions from larger developments will be negotiated on a case by case basis.	No change