

**Sustainability Appraisal and Strategic Environmental Assessment of  
Epsom and Ewell Development Framework**

**Developer Contributions  
Supplementary Planning Document (adoption version)**

**SUSTAINABILITY APPRAISAL REPORT**

**MAY 2008**

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Ewell Development Framework**

**Developer Contributions**  
**Supplementary Planning Document (adoption version)**

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**Details of documents referred to in this SA Report can be found on or through the EEBC web pages:**

[www.epsom-ewell.gov.uk](http://www.epsom-ewell.gov.uk)

## **1. Non Technical Summary (NTS)**

### **1.1 Purpose of NTS**

1.1.1 This Non Technical Summary describes the findings of the sustainability attributes of the Developer Contributions Supplementary Planning Document (the SPD).

### **1.2 Defining the Scope of the Sustainability Appraisal (SA)**

1.2.1 SA seeks to identify whether the SPD is compatible with environmental, social and economic objectives and, where positive impacts are likely, how benefits could be maximised. Appraisal also involves a consideration of whether any changes could be made to the SPD to avoid harm.

1.2.2 The detailed context for appraisal and the key issues were established through consultation with statutory bodies, local groups, neighbouring authorities and the public. Further information on the process of SA, including consultation is provided as Appendix 3 to the full SA Report.

### **1.3 The purpose and scope of the SPD**

1.3.1 Developers will be required to make contributions to the provision of affordable housing and infrastructure. Infrastructure is defined as education, transport, libraries, health care, open space, sport and recreation, environmental improvements (public realm), community facilities, and recycling. The SPD clarifies how a tariff approach will be used such that where a development exceeds a certain threshold or criteria a financial contribution will be required towards infrastructure provision. For affordable housing, a threshold of 5 houses is set, above which 20% of the properties will be required to be affordable; and a threshold of 15 houses, above which 40% will be required to be affordable.

1.3.2 A more discretionary approach, which would require negotiation for each planning application, has been rejected since it is not likely to deliver adequate affordable housing or infrastructure in Epsom and Ewell Borough. The main concern with such an approach is that it is likely to be difficult to secure contributions due to a relatively high number of small developments occurring in recent years.

1.3.3 The SPD is likely to make a significant positive contribution to sustainability on the basis that it identifies how affordable housing and the timely provision of infrastructure will be delivered. This will support a healthy population and a sustainable economy.

1.3.4 The need to deliver climate proofed infrastructure and improved standards of sustainable design and renewables is not fully addressed in the SPD. It is considered more appropriate for this to be delivered by implementing Policy CS6 of the Epsom and Ewell Core Strategy. More specific requirements relating to

sustainable design and renewables will be set out in forthcoming Development Plan Documents.

- 1.3.5 It is considered to be similarly appropriate not to include water and sewerage infrastructure and energy infrastructure since they would be provided through necessity for any development.

## **1.4 Predicted impacts**

### Benefits and mitigation

- 1.4.1 It is predicted that strong benefits will result for the economy. Firstly, more developments will be making a contribution to infrastructure and secondly, an increased provision of affordable housing will ensure suitable accommodation for key workers (although these are not specifically targeted).
- 1.4.2 The availability of more affordable housing will benefit the community in general whilst for individual households there is likely to be a benefit to well being. The likelihood of this outcome is strengthened since the SPD encourages protection and provision of public realm and community facilities. It is likely that improved accessibility to community infrastructure will particularly benefit the elderly and young.
- 1.4.3 The appraisal process has identified concern with respect to the requirement for contributions potentially affecting the viability of development proposals. The SPD seeks to address this by specifying the circumstances where exemptions apply.
- 1.4.4 Following consultation on the SPD, a number of changes have been made to the SPD. The majority of the changes are minor:
- a clearer explanation of how and when the document will be updated
  - the Council will, where appropriate negotiate on a site by site basis
  - exemptions for commercial development have been extended to include libraries, outdoor sports facilities and community facilities
  - further clarification has been added to how monies will be monitored and reported
- 1.4.5 It is considered that these strengthen the existing objectives and sustainability benefits of the SPD by adding clarity and maintaining flexibility.
- 1.4.6 A more significant amendment has been made with respect to socially rented affordable housing. This is now exempt from paying infrastructure contributions where previously all affordable housing had to contribute. The Council currently seeks a ratio of 70 to 30 for socially rented to intermediate affordable housing. The exemption seeks to encourage the provision of more rented units for which there is the greatest need.

### Uncertainty

- 1.4.7 Appraisal found that the requirement for contributions potentially affects the levels of development activity in the Borough. For example, costs related to the development of previously developed land affected by contamination could prevent the proposal coming forward and, consequently, the delivery of affordable housing. The likelihood of this occurring has been minimised by stipulating viability tests whereby exceptions could be made to the requirement for contributions.
- 1.4.8 The intention of the Council to pool contributions is set out in the SPD. In instances where developments which in themselves are insufficient in scale to directly fund the infrastructure, required infrastructure will be funded from pooled contributions. It is inevitable that benefits would be implemented only after a period of time which enables sufficient funds to be accumulated. The beneficial effects of the SPD are, therefore, likely to be greater in the longer term than in the short term.
- 1.4.9 Monitoring implementation of the SPD is recommended to help identify instances where policy may need to be amended in the future should certain key issues not be addressed fully.

### Monitoring

- 1.4.10 The SPD is one of several documents forming the Epsom and Ewell Development Framework. The impact of all planning documents in the Development Framework will be monitored on an annual basis through the Annual Monitoring Report (AMR) and the Council is developing a strategy to facilitate this. A commentary will be included at the appropriate time in the AMR with respect to the contribution this SPD makes to sustainability. It is considered that the SPD may have the following impacts on specific sustainability objectives:

## 2. Sustainability Appraisal Process

### 2.1 Guidance

2.1.1 Sustainability Appraisal (SA) is required by section 19(5a) of the Planning and Compulsory Purchase Act 2004. A summary of the procedure followed is set out in Table 1, over the page, and is based on the SA Guidance published by the ODPM in November 2005. This SA Report also meets the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the SEA Directive (2001/42/EC).

| <b>Table 1: Sustainability Appraisal Procedure</b> |  |                          |                              |
|--|--|--------------------------|------------------------------|
| <b>SPD Stage</b>                                   | <b>SA Stage (SA Guidance 2005)</b>                         | <b>Action</b>            | <b>Dates</b>                 |
| Pre production of SPD                              | A: Context, baseline and scope                             | Scoping Report           | May 2005 and May 2007        |
| SPD Production                                     | B: Appraisal of options                                    | Sustainability Appraisal | October 2007 to January 2008 |
|  | C: Preparing the SAR                                       | SA                       |                              |
| Consultation                                       | D: Regulation 17 consultation on the draft SPD and the SAR | This stage               | February 2008                |
|  | D: Consider representations, finalise SPD and revise SAR.  | Revision to SPD and FSAR | April and May 2008           |
| SPD Implementation                                 | E: Monitor the significant effects of the SPD              | Annual Monitoring Report | Ongoing                      |

2.1.2 Further information on the process of SA, including consultation is provided as Appendix 3 to the full SA Report.

### 2.2 Appropriate Assessment

2.2.1 The requirement for an Appropriate Assessment is outlined in Article 6(3) and (4) of the European Communities (1992) Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.

2.2.2 It has been demonstrated that the Core Strategy will not, in isolation, impact on the European sites that are in proximity to the Borough's boundaries. However, in combination with the South East Plan there may be effects, notably with respect to concern that vehicle emissions and water abstraction may increase through additional housing. Should the South East Plan require revision following its examination and consideration of its Appropriate Assessment, the Council is committed to reviewing the Core Strategy accordingly. At this stage and for this

SPD there is not considered to be a need to seek alternative solutions or to devise compensation.

## 2.3 The SA framework

2.3.1 The SA Framework provides a way of checking whether the aims and methods of the SPD are the best possible ones for sustainability and is comprised of 21 sustainability objectives with corresponding indicators. The Sustainability Objectives are distinct from the objectives of the SPD although they may in some cases overlap.

| <b>Table 2: SA Objectives</b> |  |
|-------------------------------|--|
| 1                             | To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.  |
| 2                             | To facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.  |
| 3                             | To reduce poverty and social exclusion by improving and encouraging inclusive access to education, employment, recreation, health, community services and cultural opportunities for all sectors of the community. |
| 4                             | To create and maintain safer and more secure communities.  |
| 5                             | To protect public wellbeing by minimising the harm from flooding   |
| 6                             | To make the best use of previously developed land and existing buildings, encouraging sustainable construction.  |
| 7                             | To reduce land contamination and safeguard soil quality and quantity.  |
| 8                             | To ensure air quality continues to improve and noise/light pollution is reduced.   |
| 9                             | To conserve and enhance biodiversity within the plan area.   |
| 10                            | To protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors.                             |
| 11                            | To reduce road congestion and pollution levels by encouraging and improving travel choice and reducing the need for travel by car/lorry.   |
| 12                            | To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the Borough is prepared for its impacts [could include aviation and road transport].                        |
| 13                            | To maintain low rates of unemployment and high levels of economic activity, by improving skills, training and education, and access to them.   |
| 14                            | To provide for appropriate commercial development opportunities to meet the needs of the economy.  |
| 15                            | To provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].   |
| 16                            | Balancing the needs for employment and housing to reduce the need to travel.   |
| 17                            | To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.  |
| 18                            | To reduce waste generation and disposal, and achieve the sustainable management of waste.  |
| 19                            | To maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water  |
| 20                            | To increase energy efficiency.   |
| 21                            | To increase the production and use of renewable energy/fuels   |

## **2.4 Purpose of the SPD and Options**

- 2.4.1 The role of the SPD is to provide guidance on the contributions expected from developments in all areas of the Borough. Core Strategy Policies CS4, CS9 and CS12 set the context for contributions to be used to provide wider community benefits and provide a platform to secure additional benefits from future planning applications. Policy CS4 requires contributions for open spaces and green Infrastructure; CS9 requires contributions for affordable housing; and CS12 requires developer contributions for community infrastructure. The SPD must conform to the Core Strategy DPD and these policies in particular.
- 2.4.2 The Surrey Boroughs and Districts, in collaboration with the County Council, have considered the options presented in the Audit Commission's report 'Securing Community Benefits through the Planning Process':
1. Detailed service based policy
  2. Discretionary
  3. Tariffs and formulae
- 2.4.3 The Preferred Option emerging from the collaborative approach was to establish tariffs and formulae at Borough level (Option 1). Option 2 was not considered appropriate since it was such an approach which had led to the situation arising in Surrey whereby smaller developments were not contributing to infrastructure or affordable housing.
- 2.4.4 The scope for considering alternatives further restricted since Policy CS9 specifically requires the SPD to use a tariff based system. Appraisal of the SPD has, therefore, involved consideration of the sustainability attributes of current policy (Core Strategy Policies CS4, CS9 and CS12) and an appraisal of the proposed methodology for delivering the requirements of these policies. The draft SPD has been appraised in its entirety rather than the identifying individual aspects since the latter would not be conducive to a meaningful appraisal. Full details of the appraisal of these options are set out in Section 2.6 and a summary in Appendix One and Appendix Two.
- 2.4.5 Affordable Housing is addressed in Part 2 of the SPD whilst Part 3 considers infrastructure, covering education, transport, libraries, health care, open space, sport and recreation, environmental improvements (public realm), community facilities, and recycling. The key role of the SPD will be to assist developers, landowners and others in understanding when a developer contribution may be required.
- 2.4.6 Following consultation a significant amendment has been made to the SPD with respect to socially rented affordable housing, which is now exempt from paying infrastructure contributions. In the draft SPD it was stipulated that all affordable housing had to contribute. Since current policy is for the Council to seek a 70 to 30 split for affordable for socially rented to intermediate. The aim is to encourage the provision of more rented units for which there is the greatest need. This option amendment has, therefore, been the subject of further appraisal and this

### **3. Social, economic and environmental baseline characteristics and requirements of other plans**

#### Other plans and programmes

A key part of the SA process is to consider the requirements of other plans in the context of the scope of the SPD. In this way, a judgement can be made concerning which issues could be addressed. It is this process alongside a consideration of current economic, social and environmental conditions (the baseline, Section 3.2) that helps determine the key sustainability issues.

It is considered that this SPD will strongly influence social, environmental and economic conditions in the Borough in conjunction with other plans in the Local Development Framework and the full list of other plans is relevant. Whilst the following text provides a summary of the key issues, the full list of other plans can be viewed on the Council's website [www.epsom-ewell.gov.uk](http://www.epsom-ewell.gov.uk).

The Core Strategy is strongly influenced by PPS1, Delivering Sustainable Development, 2005 (together with the Climate Change Supplement December 2007) and sets out a vision that builds on these objectives and provides further direction for the Developer Contributions SPD. Delivery of housing affordability is central to the vision, picking up on the requirements of the Sustainable Communities Plan 2003, Rural Strategy 2004 and PPS3, Housing 2006 and the supporting Circular 6/98, Planning and Affordable Housing. The Epsom and Ewell Housing Strategy 2002 to 2007 clarifies the importance of affordable housing at local level. Other documents identify specific needs, including Circular 22/91 Travelling Showpeople, which is in the process of being revised; Circular 01/2006, Planning for Gypsy and Traveller Caravan Sites, and the Surrey Local Government Association Key Worker Strategy.

An issue of particular interest for the Developer Contributions SPD is the provision of affordable housing. Core Strategy Policy CS11 has set a target that overall, 35% of all new dwellings in the Borough should be affordable (this equates to the provision of 950 new affordable dwellings over the period 2007 to 2022).

Priorities emerging from consideration of other plans reinforce those set out in the Core Strategy. Of the Draft South East Plan key objectives (Section A, page 11), two are particularly relevant to the SPD:

- v) The need for a substantial increase in the supply of appropriate affordable housing, and for a package of measures to deliver that goal;
- vi) The need for timely infrastructure provision that keeps pace with development and greater reassurance on that issue through a dialogue with Government on how to plan for that development.

With respect to the second objective, the 2002 document 'Infrastructure and Amenity Requirements to Support New Dwellings, A Good Practice guide to Provision in Surrey' points to the importance of a consistent and co-ordinated approach to contributions. Epsom and Ewell Borough Council agrees with this vision and the infrastructure element of this SPD builds on an approach developed by all Surrey districts working together as part of a collaboration project. The Draft South East Plan vision includes achieving better management of the impact of its consumption on people and the environment and an increase in the overall level of accessibility to essential services. A number of priorities have been set out in the Council's Corporate Plan (2007 to 2011). These include enhancing the visual appearance of the local environment and promoting sustainability.

The Surrey Local Transport Plan (2006/07 to 2010/11) prioritises tackling congestion and improving accessibility. Improving accessibility, especially for socially excluded groups would not only require transport measures but, and in keeping with PPG8, would include telecommunications.

PPG17, Planning for Open Space, Sport and Recreation, 2003 establishes a methodology for assessing need and opportunity. In line with this, the Council appointed consultants to undertake an Open Space Audit which was completed in March 2006. This evaluates existing provision and presents a set of quantity, quality and accessibility standards for various types of open space. Epsom and Ewell Leisure Strategy 2002 and the Epsom and Ewell Health Strategy reinforce the need to enhance sporting opportunities, pedestrian and cycling facilities, transport plans to the benefit of health in its widest sense.

The UK Sustainable Development Strategy March 2005 together with the UK Climate Change Programme 2006 place a strong emphasis on living within environmental limits as well as the implications of climate change and the scope for mitigation and management measures. The European Water Framework Directive 2000/60/EC provides a common approach for setting environmental objectives for all ground and surface waters and the promotion of sustainable water use. This subject is taken forward in the Initial Advice document produced by the UK government in 2006 and reinforced by the Water Act 2003. The Thames Region Catchment Flood Management Plan and PPS25, Development and Flood Risk, 2006 provide information and a methodology for ensuring water infrastructure is adequate and that development does not compromise flood risk.

A companion guide to PPS1 was issued in December 2007 on the subject of Climate Change (PPS1: Planning and Climate Change). This reinforces the urgency in delivering improved water management, more community and renewable energy production and more robust infrastructure.

With respect to addressing the causes of climate change, PPS22 Renewable Energy, 2004 encourages the development of non fossil fuel and localised sources of energy. Targets are to be set at the sub regional level and the Council will be developing targets for renewable energy which will be set out in forthcoming Local Development Framework documents.

Whilst the Surrey School Organisation Plan 2003/4 to 2008/9 does not identify any concerns about meeting the requirements for school places, the Surrey Education

Service Strategy seeks to improve education standards and. A short term peak demand for secondary places may require temporary provision over the following three years.

The priorities of the Local Strategic Partnership are set out in the Community Strategy. This contains two overarching themes, with the following elements:

- A caring society and a thriving economic community
- A protected and improved environment
- A safe society
- A healthy society
- A harmonious and inclusive society

Within these elements are a number of aims, which include providing affordable housing and improving recruitment of key workers as well as improving the environment, especially open spaces.

The above priorities are to be framed within the context and provisions of Circular 05/2005, Planning Obligations. The Circular sets tests and identifies the parameters for securing contributions from developers such that a focus can be developed, through the lead of the Core Strategy, to maximise benefits. There is no suggested mechanism by which a set of priority needs can be identified, although the Circular clarifies the role of Developer Contributions as to make development acceptable where it might otherwise not be so and where planning conditions alone cannot secure this. Any obligations must be relevant to planning, necessary, directly related to the development and reasonable, but not a betterment levy. The scope covers affordable housing, mitigating the impact of development and providing community or other infrastructure.

### Baseline

A 'Characterisation of the Area' report was produced which involved the collection of social, economic and environmental data for the Borough to update the 2003 Epsom and Ewell Borough Profile. Drawing from this a Scoping Report was used to identify key sustainability issues affecting the Borough, the full details of which can be viewed on the Council's website:

[www.epsom-ewell.gov.uk](http://www.epsom-ewell.gov.uk).

The Sustainability Appraisal Report for the Core Strategy provides a summary of the key sustainability issues affecting the Borough. Considering the issues which are raised in that document in the context of this appraisal, it is the following points that are considered to be relevant to the appraisal of the SPD and provide a focus for this appraisal:

- House prices in the Borough are high and are continuing to rise;
- A shortage of affordable homes which needs to be addressed;
- A need to ensure access to health care facilities, particularly when considering the Borough has an aging population;
- The protection of community, recreational and leisure facilities is important;

- Transport issues are a priority such as reducing congestion and the use of the private car;
- A need to ensure that the character of the countryside or townscapes are protected and that biodiversity is not adversely affected by development;
- Development needs to withstand some of the effects that may arise from climate change;
- The amount of greenhouse gases that are emitted must be reduced;
- The efficient use of energy and the production of sustainable energy needs to be encouraged;
- Efficient use needs to be made of water and sustainable drainage arrangements provided; and
- Waste management should continue to move up the waste hierarchy

Previous consultation has identified concerns about accessibility and transport infrastructure (Surrey Education Business Partnership) and commented avoid unacceptable impacts on the environment such as sewage, flooding of property, pollution of land and property plus water shortages with associated low pressure water supply problems (Thames Water).

#### **4. Appraisal of Current policy**

This Sustainability Appraisal builds on previous SA of other documents in the Local Development Framework (see [www.epsom-ewell.gov.uk](http://www.epsom-ewell.gov.uk)). Core Strategy Policies CS4, CS9, CS12 provide the basis for the SPD and it is appropriate, therefore, to focus specifically on the findings of appraisal of those policies as initially reported in the Core Strategy Sustainability Appraisal Report. This is set out in Appendix One to this Report.

Appraisal of current policy identified that in combination, there is strong support for the principle that new developments should make adequate provision for the infrastructure necessary to serve them, and that any adverse impact on existing services and infrastructure is mitigated. This principle would be applied to a range of infrastructure and could include transport, public open space, educational, health and leisure facilities. Core Strategy Policy CS4 and CS12 sets out this requirement and that such requirements will be related in scale and kind to the development proposed.

Policy indicates that it would be the role of an SPD to provide further details regarding the conditions and contributions which may be required before planning permission could be granted.

Appraisal has identified that the policies CS4, CS9 and CS12 strongly support the objectives of sustainability through helping to:

- meet the diverse social needs of our communities;
- meet the needs for affordable housing;
- ensure the necessary infrastructure and services are provided to support communities;
- protect and improve of community and recreational facilities;

- protect and enhance of open spaces, and creating new ones, and improving public access to them in the interests of residents, workers and visitors;
- minimise of the need to travel and encouraging opportunities for trips to be made by alternative modes of travel to the motor car; and
- secure environmental improvement

Appraisal has identified, however, that in requiring contributions there may be an adverse impact on the financial viability of development, particularly where costs of using previously developed land and implementing non standard sustainable design features can impact upon profit margins.

Appraisal has identified other issues have been identified which the SPD could seek to address and these are listed below:

- protecting and improving cultural facilities
- ensuring all aspects of new developments accord with the principles of good design, create safe and inclusive places, and contribute positively towards local distinctiveness;
- ensuring new development incorporates sustainable building principles and high standards of energy efficiency;
- using communications technology to support the reduced need to travel;
- encouraging highway safety and environmental improvement measures which reduce the detrimental impacts of high traffic volumes;
- infrastructure which allows for reduced impact of consumption (water, energy, waste); and
- encouraging environmental improvement (biodiversity)

## **5. Testing the SPD objectives against the SA framework and developing the SPD options**

This next stage of appraisal involved consideration of the draft SPD in its entirety against the sustainability objectives. This approach is considered to be appropriate since breaking the SPD down into constituent parts would result in repetition and would not be conducive to a meaningful appraisal.

A key role of the SPD is to consolidate and build on Policies CS4, CS9 and CS12, providing greater certainty that affordable housing and infrastructure will be delivered in a timely manner. It is considered that the approach of the SPD in using a combination of a tariff informed by detailed service based policy to determine formulae reduces the likelihood that no contribution is made by a development. Certain types of development may, perhaps because of size or complexity, create impacts that give rise to more extensive obligations than are set out in the guidance, however, and it is difficult to predict the scale of the effects in the short term. In general, it is considered that the SPD will be strongly positive in terms of improving the health of the population and supporting a sustainable economy.

The intention of the Council to pool contributions is set out in the SPD. In instances where developments that in themselves are insufficient in scale to directly fund the

infrastructure, this will be required. Since much of the infrastructure will be funded in such a way, it is inevitable that it will be implemented only after a period of time which enables sufficient funds to be accumulated. The beneficial effects of the SPD will, therefore, inevitably be greater in the longer term than in the short term. However, some effects will still be apparent in the short-term, either arising from large scale development proposals requiring specific infrastructure in order for them to proceed, or from small infrastructure projects which can proceed with only limited funding.

Appraisal of the Core Strategy Policies suggests a degree of uncertainty in that the requirement for contributions may affect the levels of development activity in the Borough. For example, costs related to the development of previously developed land affected by contamination could lead to a reduction in affordable housing provision and/or reduced contributions towards infrastructure. The likelihood of this occurring has been minimised by stipulating viability tests based on the levels of contributions proposed in the SPD and clarifying the criteria for identifying abnormal costs. Furthermore, it is proposed that the SPD adopts an approach of prioritising the contributions should viability be an issue. The order of priority for contributions is:

- i. Site Specifics
- ii. Affordable housing
- iii. Other infrastructure contributions

There are a number of issues identified at paragraph 4.1.6 of this Report which have not been specifically addressed in the SPD. It is recognised that the Developer Contributions SPD is not necessarily the appropriate document to cover all these issues, rather that it would work in tandem with other specialist policies and guidance. In addition, it is considered that water and sewerage infrastructure and energy infrastructure are beyond the scope of the SPD and would be provided through necessity for any development.

Following consultation a potentially significant amendment has been made to the SPD with respect to socially rented affordable housing. This is now exempt from paying infrastructure contributions where previously all affordable housing had to contribute. The Council currently seeks provision of socially rented to intermediate affordable housing in the ratio 70 to 30. This is likely to encourage the provision of more rented units for which there is the greatest need; and addresses the issue of the potential adverse impact of the viability of development projects.

## **6. Recommendations for monitoring the significant effects of implementing the SPD**

The SPD is considered to offer many strong benefits for sustainability. In view of concerns identified with respect to the viability of development projects, however, it is recommended that the amount and type of affordable housing and the level of contributions or amount of infrastructure provided are included in the LDF Annual Monitoring Report.

## **Appendix One**

### **Core Strategy Policies CS4, CS9 ad CS12 compared with Sustainability Objectives**

| <b>CS4 (Open Spaces and Green Infrastructure)</b>   |  |   |
|---|--|---|
| <b>Sustainability Objective</b>   | <b>Impact (all short to long term unless stated)</b> | <b>Comments</b>   |
| provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford   | Uncertain  | Provides homes with suitable infrastructure in a timely fashion, although may affect viability of delivering housing due to increased development costs |
| facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent   | Double positive                                      |   |
| reduce poverty and social exclusion, encouraging inclusive access to education, employment, recreation, health, community services and cultural opportunities for all               | Positive   |   |
| create and maintain safer and more secure communities.  | Double positive                                      | Improve the quality of open space   |
| protect public wellbeing by minimising the harm from flooding   | Positive   | May provide flood water storage capacity  |
| reduce land contamination and safeguard soil quality and quantity.  | Positive   |   |
| conserve and enhance biodiversity within the plan area.   | Positive   | Open spaces may act as a reservoir for biodiversity   |
| protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors. | Positive   |   |
| address the causes and consequences of climate change   | Positive   | Open space could be used for water management   |
| maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water  | Positive   | Open space could be used for water management   |

| <b>CS9 (Affordable Housing)</b>   |  |   |
|---|--|---|
| <b>Sustainability Objective</b>   | <b>Impact (all short to long term unless stated)</b> | <b>Comments</b>   |
| provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford   | Double positive                                      |   |
| facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent   | Double positive                                      |   |
| reduce poverty and social exclusion by improving and encouraging inclusive access to education, employment, recreation, health, community services and cultural opportunities for all community | Double positive                                      |   |
| reduce road congestion and pollution by encouraging and improving travel choice and reducing the need to travel   | Double positive                                      | Increases the possibility for people to purchase a home near their place of work  |
| maintain low rates of unemployment and high levels of economic activity, by improving skills, training and education, and access to them  | Double positive                                      | Ensuring all sectors of the workforce have access to local housing  |
| balancing the needs for employment and housing to reduce the need to travel   | Positive   | Increase the possibility for people to purchase a home near to their place of work  |
| make best use of PDL & existing buildings, encouraging sustainable construction   | Negative   | Costs related to the development of PDL could lead to a reduction of affordable housing or infrastructure   |
| reduce land contamination and safeguard soil quality and quantity   | Negative   | Costs related to the remediation of contaminated land could lead to a reduction of affordable housing provision and/or infrastructure contributions   |
| increase energy efficiency  | Negative   | Costs related to the construction of energy efficient buildings could lead to a reduction of affordable housing and or infrastructure contributions, although costs are likely to reduce in the long term due to new technologies |
| increase the production and use of renewable energy / fuels   | Negative   | As above  |

| <b>CS12 (Developer Contributions to Community Infrastructure)</b>   |  |  |
|---|--|--|
| <b>Sustainability Objective</b>   | <b>Impact (all short to long term unless stated)</b> | <b>Comments</b>  |
| provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford   | Positive   | Provides homes with suitable infrastructure in a timely fashion  |
| facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent   | Double positive                                      |  |
| reduce poverty and social exclusion by improving and encouraging inclusive access to education, employment, recreation, health, community services and cultural opportunities for all community | Double positive                                      |  |
| create and maintain safer and more secure communities   | Positive   | Will help to improve the quality of open space   |
| reduce land contamination and safeguard soil quality and quantity   | Positive   |  |
| conserve and enhance biodiversity within the plan area  | Positive   | Open spaces may act as a reservoir for biodiversity  |
| protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit of both residents and visitors              | Positive   |  |
| reduce road congestion and pollution levels by encouraging and improving travel choice and reducing the need to travel by car / lorry   | Positive   | Provision of infrastructure from day one will immediately provide residents with a choice of transport options |
| reduce waste generation and disposal, and achieve sustainable waste management  | Positive   | If facilities are provided from day one, residents will be more inclined to use them                           |
| maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water  | Positive   | Provision of sewerage infrastructure   |

## **Appendix Two**

### **SPD compared with Sustainability Objectives**

| <b>Draft SPD</b>  |  |  |
|---|--|--|
| <b>Sustainability Objective</b>   | <b>Impact (all short to long term unless stated)</b> | <b>Comments</b>  |
| provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.  | Double positive                                      | Provides homes and suitable infrastructure in a timely fashion. SPD allows flexibility where abnormal costs may affect viability of delivering housing.  |
| facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.  | Double positive                                      | Direct benefit to provision of health care. Affordable housing and infrastructure support employment   |
| reduce poverty and social exclusion by improving and encouraging inclusive access to education, employment, recreation, health, community services and cultural opportunities for all sectors of the community. | Double positive                                      | Encourages inclusive and sustainable patterns and forms of transport. Increases the possibility for people to purchase a home near their place of work   |
| create and maintain safer and more secure communities.  | Double positive                                      | Improve the quality of open space  |
| protect public wellbeing by minimising the harm from flooding   | Positive   | Flood prevention is identified as a standard cost at 2.7.2   |
| make the best use of previously developed land and existing buildings, encouraging sustainable construction.  | Uncertain  | SPD allows flexibility where abnormal costs may affect viability of delivering housing.  |
| reduce land contamination and safeguard soil quality and quantity.  | Uncertain  | Costs related to the development of PDL could lead to a reduction of affordable housing provision and / or infrastructure contributions. Flexibility is built in to the SPD, however, since this would be considered an abnormal cost. |
| ensure air quality continues to improve and noise/light pollution is reduced.   | Positive   | Encourages sustainable patterns and forms of transport (air quality). Policy CS6 in Core Strategy provides adequate control for noise and light.   |
| conserve and enhance biodiversity within the plan area.   | Positive   | Open spaces may support biodiversity   |
| protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and  | Positive   | Encourages protection and provision as public realm and community facilities.  |

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| cultural assets, for the benefit of both residents and visitors.   |                 |   |
| reduce road congestion and pollution levels by encouraging and improving travel choice and reducing the need for travel by car/lorry.  | Double positive | Increases the possibility for people to purchase a home near their place of work                                |
| address the causes of climate change through reducing emissions of greenhouse gases and ensure that the Borough is prepared for its impacts [could include aviation and road transport]. | Positive        | Encourages sustainable patterns and forms of transport. Open space could be used for water management.          |
| maintain low rates of unemployment and high levels of economic activity, by improving skills, training and education, and access to them.  | Positive        | Affordable housing and infrastructure support employment. Key workers are not targeted, however.                |
| provide for appropriate commercial development opportunities to meet the needs of the economy.   | Positive        | Affordable housing and infrastructure support employment  |
| provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].  | No impact       |   |
| balancing the needs for employment and housing to reduce the need to travel.   | Positive        | Increase the possibility for people to purchase a home near to their place of work                              |
| reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.   | Positive        | Supports local provision of infrastructure and services   |
| reduce waste generation and disposal, and achieve the sustainable management of waste.   | Positive        | Supports local provision of infrastructure and services, although waste management beyond the scope of the SPD. |
| maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water   | No impact       | Water and sewerage infrastructure would be provided as standard, but not within the scope of this SPD.          |
| increase energy efficiency.  | No impact       | Not within scope of SPD   |
| increase the production and use of renewable energy/fuels  | No impact       | Not within scope of SPD   |

| <b>Amendment to SPD (adoption SPD): socially rented affordable housing exempt from paying infrastructure contributions</b>  |  |  |
|---|--|--|
| <b>Sustainability Objective</b>   | <b>Impact (all short to long term unless stated)</b> | <b>Comments</b>  |
| provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.  | Double positive                                      | Encourages the provision of more rented units for which there is the greatest need.  |
| facilitate the improved health and wellbeing of the whole population, including enabling people to stay independent.  | Double positive                                      | Encourages the provision of more rented units for which there is the greatest need.  |
| reduce poverty and social exclusion by improving and encouraging inclusive access to education, employment, recreation, health, community services and cultural opportunities for all sectors of the community. | Double positive                                      | Encourages the provision of more rented units for which there is the greatest need.  |
| create and maintain safer and more secure communities.  | No impact  |  |
| protect public wellbeing by minimising the harm from flooding   | No impact  |  |
| make the best use of previously developed land and existing buildings, encouraging sustainable construction.  | Positive   | Likely to be compatible with high density development.   |
| reduce land contamination and safeguard soil quality and quantity.  | Positive   | May improve viability of proposed developments on pdl.   |
| ensure air quality continues to improve and noise/light pollution is reduced.   | No impact  |  |
| conserve and enhance biodiversity within the plan area.   | Positive   | Likely to be compatible with high density development. May improve viability of proposed developments on pdl. Both support protection of biodiversity. |
| protect, enhance and, where appropriate, make accessible the natural, archaeological and historic environments and cultural assets, for the benefit   | No impact  |  |

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| of both residents and visitors.  |           |  |
| reduce road congestion and pollution levels by encouraging and improving travel choice and reducing the need for travel by car/lorry.  | Positive  | May support high densities around transport hub.   |
| address the causes of climate change through reducing emissions of greenhouse gases and ensure that the Borough is prepared for its impacts [could include aviation and road transport]. | Positive  | May support high densities around transport hub. May improve viability and ability to meet higher level of Code for Sustainable Homes. |
| maintain low rates of unemployment and high levels of economic activity, by improving skills, training and education, and access to them.  | Positive  | Affordable housing supports the economy.   |
| provide for appropriate commercial development opportunities to meet the needs of the economy.   | No impact |  |
| provide additional commercial development in urban areas [stimulating economic revival in priority regeneration areas].  | No impact |  |
| balancing the needs for employment and housing to reduce the need to travel.   | Positive  | Increase the possibility for people to purchase a home near to their place of work   |
| reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.   | Positive  | May support high densities around transport hub. May improve viability and ability to meet higher level of Code for Sustainable Homes. |
| reduce waste generation and disposal, and achieve the sustainable management of waste.   | No impact |  |
| maintain and improve the water quality of the region's rivers and groundwater, and to encourage the sustainable use of water   | No impact |  |
| increase energy efficiency.  | Positive  | May improve viability to meet higher level of Code   |
| increase the production and use of renewable energy/fuels  | Positive  | May improve viability and ability to meet higher level of Code for Sustainable Homes.  |

## **Appendix Three**

### **Technical and procedural information**

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| <b><u>Technical and procedural information</u></b>   |  |
| The following checklist identifies the tasks to meet the requirements of <b>The Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633)</b> and <b>European Directive 2001/42/EC</b> (the SEA Directive) "on the assessment of the effects of certain plans and programmes on the environment" |  |
| <b>Consultation</b>  |  |
| Scoping Report   | May 2005 and May 2007  |
| Consultation Responses   | See the Council's Consultation Statement   |
| Sustainability Appraisal Report  | The draft SPD and a Sustainability Appraisal Report were available to the public during a five week consultation from February to March 2008. The response of Epsom and Ewell Borough Council to consultation comments are detailed in the Council's Consultation Statement. |
| <p>Documents are available at:</p> <p><a href="http://www.epsom-ewell.gov.uk">www.epsom-ewell.gov.uk</a></p>   |  |

| <b><u>Technical and procedural information</u></b>  |  |
|---|--|
| Screening of SPDs that have no significant effects  | A Sustainability Appraisal is required by Section 19 of the Planning and Compulsory Purchase Act 2004. It is considered that, since this would cover the requirements for an Environmental Assessment under the Environmental Assessment of Plans and Programmes Regulations 2004, undertaking a formal screening process would be of no benefit or consequence to the process of producing the SPD. |
| The SEA Directive   |  |
| The relationship of the plan or programme with other relevant plans and programmes<br><br>(Annex I(a) SEA Directive)  | Section 3.1  |
| The environmental protection objectives, established at international, European Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation<br><br>(Annex I (e) SEA Directive) |  |
| Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme and the environmental characteristics of the areas likely to be significantly affected<br><br>(Annex I (b) SEA Directive)   | Section 3.1  |
| Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409EEC and 92/43/EEC   | Section 3.1 and Section 4, with a reference to Appropriate Assessment at Section 2.2   |

| <b><u>Technical and procedural information</u></b>  |  |
|---|--|
| <p>Articles 5.4 and 6.3 of the SEA Directive require that the authorities which, by reason of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programmes shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report.</p> <p>The authorities with relevant environmental responsibilities and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme</p> <p>(Article 6(2) SEA Directive)</p> | <p>Natural England, the Environment Agency and English Heritage consulted on LDF Scoping Reports and during Regulation 17 consultation on the draft SPD with supporting SAR.</p> |
| <p>Article 5.1 of the SEA Directive requires that an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated</p>   | <p>This Report</p>   |
| <p>Information to be provided in the Environmental Report includes an outline of the reasons for selecting the alternatives dealt with</p> <p>(Annex I (h) SEA Directive)</p>   | <p>Section 2.4</p>   |
| <p>The opinions expressed in responses to consultation and the results of any transboundary consultations shall be taken into account during the preparation of the plan or programme and before its adoption</p> <p>(Article 8 SEA Directive)</p>  | <p>Achieved through scoping exercises in May 2005 and May 2007</p>   |
| <p>Article 9 (1) of the SEA Directive requires the public are informed and the plan made available when adopted, together with a consultation statement explaining the reasons for options chosen.</p>  | <p>This Stage</p>  |

| <b><u>Technical and procedural information</u></b>  |             |
|---|-------------|
| <p>The Environmental Report shall include a description of the measures envisaged concerning monitoring the significant environmental effects of the implementation of plans and programmes in order, <i>inter alia</i>, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action</p> <ul style="list-style-type: none"><li>▪ (Annex I (i) SEA Directive and Article 10.1 SEA Directive)</li></ul> | Section 4.3 |