

Matter 10: MIQ 12.4 Additional information including National Highways response

- 1.1 Under matter 10: Employment and Horse Racing, the Inspector asked MIQ 12.4, which is set out below.
- 1.2 ***MIQ Q12.4 I understand from the evidence base that the Plan relies on the intensification of these existing sites (the Longmead and Kiln Lane industrial estates) to meet employment needs over the plan period. The HEDNA (document HB03) identified this need to be in the region of 56,000sqm. However, the SoCG with National Highways (appendix 1 to COUD_001a) states that no significant expansion of these sites are proposed. Which is correct?***
- 1.3 The Council's response to the MIQ was as follows: *"Appendix 1 to COUD_001a is correct that no significant expansion to these sites is proposed. What is proposed is the allocation of these sites as Strategic Employment Sites to enable protection and promote intensification, as detailed in Policy DM7 of the Local Plan. However, we have contacted National Highways to clarify this matter with them and are awaiting a response."*
- 1.4 The following provides a short note of the Council's actions/response in relation to this and the conclusions including a response from National Highways.
- 1.5 Further detail as to the need for additional employment floorspace was provided in the Council's response to MIQ12.3. This identifies the need over the plan period as being for:
- 13,000 sqm of office and R&D (E(g)(i)(ii)) floorspace
 - 13,000 sqm of light and general industrial floorspace (E(g)(iii) and B2),
 - 15,500 sqm of warehousing floorspace (B8)
- Total 41,500 sqm**
- 1.6 The Pre Submission Local Plan transport modelling (document reference [IS04](#)) undertaken by the Surrey County Council (as the Highways Authority) had accounted for increases in employment floorspace, factoring in existing commitments, allocations and background jobs growth. This accounted for 16,500 sqm of employment floorspace at Longmead/Kiln Lane industrial estates. However, to understand the implications of the full employment needs over the Local Plan period on the highway network, including the strategic road network (SRN), the council requested that Surrey County Council evaluate the impacts of an additional 25,000 sqm floorspace to ensure the full 41,500 sqm had been accounted for.
- 1.7 The impact of this additional development was tested using trip rates calculated using TRICS and applied to the model's trip distribution of the

relevant model zones. For example, for light and general industrial use, the same vehicle distribution was applied from both Kiln Lane Industrial Estate and the Gibraltar Crescent Local Plan Site zones, as these are the likely locations of the increased employment. Details of this work were shared with National Highways to enable an informed assessment as to the impact of this level of employment floorspace on the SRN. The outputs of the assessment on the SRN are detailed in the table below.

1.8 Estimated total number of additional trips on National Highway network

AM peak hour (0800 – 0900)	Vehicles per hour
A3 Painshill to Esher Common Northbound	0.3
A3 Esher Common to Painshill Southbound	0.7
M25 Junction 10 to 9 Anticlockwise	6.6
M25 Junction 9 to 10 Clockwise	0.2
AM Total	7.9
PM peak hour (0800 – 0900)	Vehicles per hour
A3 Painshill to Esher Common Northbound	0.2
A3 Esher Common to Painshill Southbound	0.6
M25 Junction 10 to 9 Anticlockwise	0.4
M25 Junction 9 to 10 Clockwise	1.9
PM Total	3.2

- 1.9 From the data provided in Table 1, it is demonstrated that the impact of the residual employment floorspace will have a negligible impact on the SRN.
- 1.10 National Highways has also responded to confirm that *“the impacts on the SRN of increased economic floorspace over and above what was tested through the model (approx. 25,000 sqm over the plan period) supplied by Surrey County Council are negligible. The conclusion of the SoCG with National Highways therefore remains applicable.”* A full copy of National Highways response is set out in appendix 1.

Appendix 1: National Highways email response

From: [REDACTED]
Sent: 24 September 2025 14:26
To: [REDACTED]
Cc: [REDACTED]
Subject: [CAUTION EXTERNAL] FW: #25787Epsom and Ewell Local Plan Examination - Inspectors Question
Importance: High

Caution: This is an external email and could contain malicious content. Do not open any link or attachments if you were not expecting them. If the e-mail looks suspicious, please report this via the 'Report Spam' or 'Report Phishing' button found on your Censornet toolbar within Outlook.

Hello [REDACTED]

Thank you for sending the information relating to the question from your EIP Inspector about the further addition of industrial floor space in your Local Plan.

Irrespective of National Highways' reading of Epsom & Ewell Borough Council's Local Plan and the significance of the intensification of the borough's existing industrial estates, National Highways' review of the Local Plan and the supporting Strategic Highways Modelling Assessment Report (SHMAR, dated October 2024) did not highlight any significant concerns with the Proposed Submission Local Plan. Further, and as our SoCG states, all queries and points of clarification in relation to the SHMAR were resolved.

The impacts on the SRN of increased economic floorspace over and above what was tested through the model (approx. 25,000sqm over the plan period) supplied by SCC are negligible. The conclusion of the SoCG with National Highways therefore remains applicable.

I hope this is sufficient for you to take back to the Inspector.

Regards,

[REDACTED]

<https://nationalhighways.co.uk>