

# **Additional Sites for Potential Allocation**

**Details of additional sites that are potentially suitable for allocation in the Epsom and Ewell Local Plan (2022-2040) through main modifications**

**April 2026**

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# 1. Introduction:

1.1.1. During the Examination Hearings concerns were raised that the Council is not doing enough to meet its housing needs through the submitted local plan. The plan proposed to meet approximately 47% of the housing need identified through the standard method that applied when the plan was prepared. The Planning Inspector requested that the Council undertake two additional discrete pieces of work which are detailed below:

- Revisiting **Appendix 5.4** of the **Land Availability Assessment 2024** (document reference: [HB01a](#)) to consider whether 54 sites discounted for availability concerns have a 'reasonable prospect' of becoming available during the Local Plan period, and if so, whether they could be considered 'developable'; and
- Revisiting **Section 4** of the **Green Belt Topic Paper 2024** (document reference [TP02](#)).

1.1.2. These workstreams were undertaken and submitted to the Inspector by 22 January 2026 and were subsequently approved for publication as part of the Examination Library. The section below summarises the findings of these two discrete pieces of work:

1.2. **Assessment of the developability of 54 urban sites** (document reference: [COUD\\_020](#))

1.2.1. The work concludes that 13 of the 54 sites reassessed can be considered to have potential to be 'developable' over the Local Plan period. In effect this means that they have a reasonable prospect of being developed from year 6 of the plan period to the end of the Local Plan Period (2040). The 13 sites are detailed in **Table 1** below:

**Table 1:** List of 13 potentially 'developable' urban sites

Site name	LAA ref	Existing Land Use(s)
25 Alexandra Road Epsom	COL006	Residential Dwelling
Gainsborough Road estate, Epsom	COU020	Undeveloped Land
Parking at 54 Gainsborough Road	COU021	Hardstanding (former garages)
85b Hook Road, Epsom	COU047	Commercial uses
Land west of Ewell By-Pass	EWE012	Undeveloped Land
47 Cheam Road Ewell Surrey	NON003	Residential Dwelling

Conservative Club, Epsom Club and Church	TOW002	Leisure / Community Use
TK Maxx	TOW007	Retail and Leisure
Land rear of The Albion Public House (Mccaffertys Bar)	TOW008	Commercial
Spread Eagle Shopping Centre *	TOW016	Retail and Leisure
Auction House, Depot Road	TOW041	Commercial and Leisure
Laine Theatre Arts	TOW052	Educational Establishment
Eclipse Business Park, West Hill	TOW067	Commercial and Leisure

1.3. **Green Belt Topic paper: Update following Examination Hearings** (document reference: [COUD\\_021](#))

1.3.1. The work reassessed all Green Belt sites promoted through the land availability assessment using a methodology agreed with the Inspector during the Examination Hearings, which considered two specific tests set out in a Planning Judgement commonly known as the Calverton Tests. The Calverton Tests essentially provide a framework for determining whether exceptional circumstances exist to potentially release land from the Green Belt through the Plan Making process (Local Plan). However, it should be noted that the Calverton Tests are not the only consideration, other sustainability factors need to be taken into account when considering the potential allocation of any Green Belt sites. The re-assessment of all of the Green Belt LAA sites resulted in 11 additional Green Belt sites that are being promoted for residential development (or residential led mixed use development) over and above the five sites contained in the submitted Local Plan being considered to satisfy the Calverton Tests. These additional 11 sites are detailed in the **Table 2** below:

**Table 2:** List of 11 sites considered for potential release from the Green Belt

Site name	LAA reference	Site Area (ha)	Existing Land Use(s)
Land West of Burgh Heath Road	COL017	1.52	Agricultural Field
Cuddington Glade	HOR001	0.52	Semi-natural Amenity Land / Open Space
Manor Park	HOR003	6.2	Amenity grassland with vegetated edges
Land off Cuddington Glade	HOR004	1.11	Public open space / Amenity grassland
Nobble Park Extension	HOR007	7.32	Allotments on the northern part of the site, open land to the south
Land South of West Part Cottage, Livingstone Park	HOR011	0.5	Former house property and grounds

Clarendon Park	HOR012	1.96	Open greenspace
Horton Hospital, Livingston Park	HOR014	10.58	Amenity greenspace
Land at Priest Hill	NON013	8.63	Open Space / Playing Fields and Previously Developed Land.
Downs Farm (Northern Parcel)	NON016	27.9	Farmland and Light Industrial Units
The Looe, Reigate Road	NON040	0.4	Commercial uses

1.3.2. Note that three sites that were being promoted for open space / Green Infrastructure are not detailed above as such uses do not require the Calverton Tests to be satisfied. To be clear these sites are detailed on **Table 3** below.

**Table 3:** List of 3 sites which do not require Calverton Test to be satisfied (promoted for open space / Green Infrastructure)

Site Name	LAA Reference
Land near Downs Road – North	COL020
Land near Downs Road – South	COL021
Land rear of Downs Road – West	WOO019

1.3.3. Following the submission and subsequent publication of the two evidence documents detailed above, in a [second post hearing letter](#) (dated 5 February 2026) the Inspector asked two questions which can be summarised as:

- Whether the additional urban sites identified should be allocated through the Local Plan to boost housing supply?
- Whether any of the additional Green Belt sites identified as satisfying the site-specific Calverton Tests are suitable for allocation to boost housing supply?

1.3.4. [Officers responded](#) to the Inspectors questions on 11 February 2026 seeking clarification from the Inspector as to whether additional sites (including those designated as Green Belt) need to be considered for allocation for the Examination to proceed. The Inspector has confirmed that this work is necessary to progress the Examination.

1.3.5. The remainder of this document is structured as follows:

- 1.3.5.1. **Chapter 2** contains an assessment of the 12 potential additional urban sites and identifies whether there are reasons why sites should not be considered further for potential allocations through the Inspectors main modifications to the submitted Local Plan.
- 1.3.5.2. **Chapter 3** contains an assessment of the 11 potential additional Green Belt sites and identifies whether there are reasons why sites should not be considered further for potential allocations through the Inspectors main modifications to the submitted Local Plan.
- 1.3.5.3. **Chapter 4** contains the conclusions and identifies the potential additional urban and Green Belt sites that could be allocated through the Inspectors main modifications to the submitted Local Plan. A trajectory and updated 5 year land supply is provided to show how the inclusion of the potential additional sites would result in increased housing delivery over the Local Plan period.
- 1.3.5.4. **Appendix A** contains Heritage Impacts Assessments for the sites that are concluded to be potentially suitable for allocation through main modifications to the Local Plan.



## 2. Urban Sites

2.1. **Table 4** provides a summary of which of the urban sites should be progressed for further consideration as to whether they could be included as allocations in the Local Plan through the Inspectors main modifications to the Local Plan. The table demonstrates that only one site is not recommended to progress for further assessment at this stage on the advice of the Lead Local Flood Authority.

**Table 4:** List of urban sites to progress for further consideration or discount

Site name	LAA ref	Progress for further assessment or discount
25 Alexandra Road Epsom	COL006	Progress
Gainsborough Road estate, Epsom	COU020	Progress
Parking at 54 Gainsborough Road	COU021	Progress
85b Hook Road, Epsom	COU047	Progress
Land west of Ewell By-Pass	EWE012	Progress
47 Cheam Road Ewell Surrey	NON003	Discount on the advice of the Lead Local Flood Authority due to the extent of surface water flood risk and the presence of an overland flow path
Conservative Club, Epsom Club and Church	TOW002	Progress
TK Maxx	TOW007	Progress
Land rear of The Albion Public House (Mccaffertys Bar)	TOW008	Progress
Spread Eagle Shopping Centre *	TOW016	Progress
Auction House, Depot Road	TOW041	Progress
Laine Theatre Arts	TOW052	Progress
Eclipse Business Park, West Hill	TOW067	Progress

2.2. Of the 12 sites that progress for further assessment detailed proformas have been prepared that contain information on the following matters:

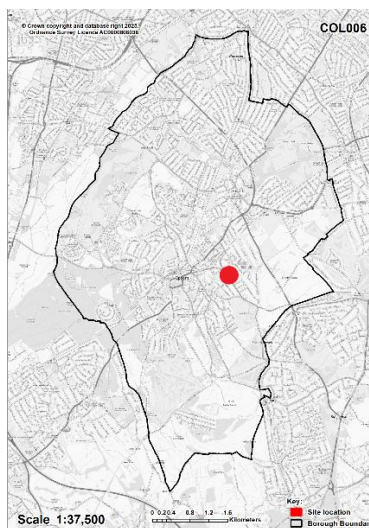
2.2.1. Transport and Accessibility (including data sourced from the Regulation 18 Transport Assessment 2023 (document reference: [IS06](#)).

- 2.2.2. Flood risk (based on the data underpinning the Epsom and Ewell Strategic Flood Risk Assessment Level 1 2024 – document reference [NE06](#)).
- 2.2.3. Heritage Assets within and in the locality of the site.
- 2.2.4. Environmental considerations (including data sourced from the Site Assessment Methodology 2024 – document reference [HB05](#)) and identifying whether any sites are located within the Borough's three Biodiversity Opportunity Areas.
- 2.2.5. The types of development that could potentially be delivered at the sites.

**Site location boundary:**



**Site location in Borough:**



**Satellite View:**



**Ward:** College

**Site area:** 0.20 ha

**Source of site:** Assessment of the developability of 54 urban sites ([COUD 020](#))

**Site description:** The site contains a locally listed single detached residential dwelling. Adjoining the site on either side are blocks of residential flats within a residential area with access to the site from Alexandra Road. Alexandra Recreation Ground is located to the rear of the site. A bus service 166 located on Alexandra Road operates between Epsom and West Croydon approximately once per hour.

**Existing land use:** Residential dwelling

**Type of Landowner:** Private (1 FH only, owned by 3 members of a family)

**Proposed use:** Residential

**Indicative yield:** 11 units (net)  
**Indicative timescale for delivery:** Developable 11-15 years

**Planning history:** 16/00653/OUT (demolition of Locally Listed Building and 14 flats - **Approved**), 16/00595/FUL (repair & conversion of house into 3 flats and 6 new self-contained flats - **Approved**) & 16/00482/OUT (demolition of Locally Listed Building and 10 flats - **Approved**)

**Key constraints:** TPOs (multiple) and Locally Listed Building.

### Transport Assessment Accessibility Scores:

Primary Schools *	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres *	Rail Stations	Green Spaces *	Total score	Rank (out of 191 sites)
4.5	2.0	2.0	2.0	4.5	2.0	4.5	21.5	52 / 191
<b>Scoring methodology:</b> 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and >30mins walk = 0 points * Primary schools, Town & Secondary Centres & Green Spaces are weighted at 1.5x; the others are weighted 1x. <b>Source:</b> <a href="#">Surrey County Council (SCC) Regulation 18 Transport Assessment</a>								

### Flood Risk Information:

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable	1	None	All of site >= 25% <50%	Sewer flooding – 6 incidents in postcode “KT17 4”  Reservoir – No Risk.

### Heritage Impact

No. 25 Alexandra Road is a Locally Listed Building that represents a rare surviving example of a late Victorian to Edwardian villa along this section of Alexandra Road, although there are lapsed permissions that if implemented would have enabled the demolition of the building. Further information is contained in the Heritage Impact Assessment for the site.

### Ecology/environmental considerations:

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
n/a	n/a	n/a	n/a	n/a	n/a
<b>Source:</b> <a href="#">Epsom &amp; Ewell</a> and <a href="#">Surrey County Council</a> mapping information					

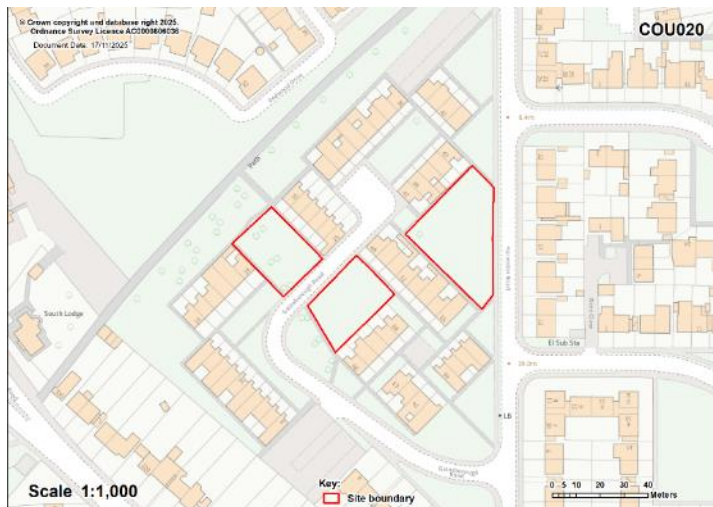
### Conclusion:

The principle of the demolition of the locally listed building has been established through planning history (see: 16/00653/OUT & 16/00482/OUT). As has been stated in Officer reports in the aforementioned applications, the significance of the heritage asset is to be found in the artistic merit of the individual elements of the stained glass, which is, or at least was, present in the form of several windows above the stairs and in panels in the front door and an additional hallway door. Informed by the Inspector, the planner’s report stated that whilst the proposals would result in the loss of the building, the significance of the asset could be safeguarded by the retention of the stained glass and its re-use in the proposed building. As such, it is considered that wholesale redevelopment of the site is acceptable. A minimum of 11 units is expected on this site, around 14 units (gross) or more possible given the planning history. In developing a scheme consideration should be given to the TPOs on the south-eastern boundary. There are no other constraints to development. The site is considered developable in years 11-15 of the plan period and can reasonably be allocated in the local plan.

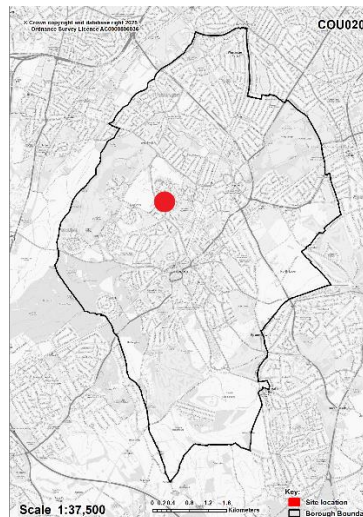
**Site address:** Gainsborough Road estate, Epsom

**Site reference:** COU020

**Site location boundary:**



**Site location in Borough:**



**Satellite View:**



**Ward:** Court

**Site area:** 0.26 ha

**Source of site:**  
Assessment of the developability of 54 urban sites ([COUD 020](#))

**Site description:** Site comprising a small cluster of 3 parcels of undeveloped open/grassed areas surrounded by residential housing on Harvester Road and Gainsborough Road.

**Existing land use:** Public amenity land

**Type of Landowner:** Private (2 FHs)

**Proposed use:** Residential

**Indicative yield:** 8 units (net)

**Indicative timescale for delivery:** Developable within years 6-10

**Planning history:** No planning history

**Key constraints:** Group TPO (across western parcels)

### Transport Assessment Accessibility Scores:

Primary Schools*	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres*	Rail Stations	Green Spaces*	Total score	Rank (out of 191 sites)
4.5	2.0	1.0	2.0	3.0	2.0	4.5	19.0	109 / 191

**Scoring methodology:** 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and >30mins walk = 0 points  
 \* Primary schools, Town & Secondary Centres & Green Spaces are weighted at 1.5x; the others are weighted 1x.  
**Source:** [Surrey County Council \(SCC\) Regulation 18 Transport Assessment](#)

### Flood Risk Information:

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable	1	Low (1 in 1,000 Year Extent) – 2.23%	All of site >= 75%	Sewer flooding – 14 incidents within predominant postcode  Reservoir – No Risk.

### Heritage Impact:

There are no heritage assets within the site or in the locality of the site. Further information is contained in the Heritage Impact Assessment for the site.

### Ecology/environmental considerations:

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
n/a	n/a	n/a	n/a	n/a	n/a

**Source:** [Epsom & Ewell](#) and [Surrey County Council](#) mapping information

### Conclusion:

The site is made up of three parcels in close proximity to each other. The eastern parcel is suitable for development, western parcel unsuitable given group TPO and southern parcel potentially suitable, although there is concern about a loss of amenity space in the western and southern parcels. Recent indication has been received from the freeholder indicating an intention to make the land available for residential development, as a result there is considered to be a reasonable prospect that it will become available over the plan period. The site could be viably developed and achievable and given the information above, the site is considered to be developable for residential use in years 6-10 of the local plan period.

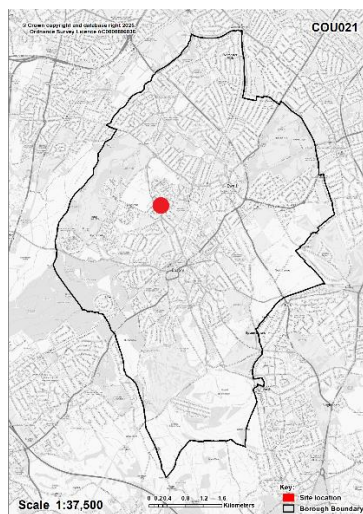
# Site address: Parking at 54 Gainsborough Road

# Site reference: COU021

Site location boundary:



Site location in Borough:



Satellite View:



**Ward:** Court

**Site area:** 0.10 ha

**Source of site:** Assessment of the developability of 54 urban sites ([COUD\\_020](#))

**Site description:** The site comprises a (previously) open parking area that is now a secure (fenced off) area of hard-standing (formerly garages until demolition) surrounded by residential housing. Housing in the immediate area does not typically have individual off street parking/driveways though the housing is generally surrounded by open grassed amenity areas and a limited amount of shared/communal parking.

**Existing land use:** Formerly parking (currently hardstanding)

**Type of Landowner:** Private (2 FHs - 1 majority of site, other includes 3 former garage plots within site)

**Proposed use:** Residential

**Indicative yield:** 6 units (net)

**Indicative timescale for delivery:** Developable within years 6-10

**Planning history:** Pre-application discussions for residential development in 2014 (8 units on this parcel).

**Key constraints:** None

### Transport Assessment Accessibility Scores:

Primary Schools	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres	Rail Stations	Green Spaces	Total score	Rank (out of 191 sites)
4.5	2.0	1.0	2.0	3.0	2.0	4.5	19.0	109 / 191
<b>Scoring methodology:</b> 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and >30mins walk = 0 points * Primary schools, Town & Secondary Centres & Green Spaces are weighted at 1.5x; the others are weighted 1x. <b>Source:</b> <a href="#">Surrey County Council (SCC) Regulation 18 Transport Assessment</a>								

### Flood Risk Assessment:

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable	1	None	All of site >= 75%	14 incidents within predominant postcode Reservoir – No Risk.

### Heritage Impact:

There are no heritage assets within the site or in the locality of the site. Further information is contained in the Heritage Impact Assessment for the site.

### Ecology/environmental considerations:

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
n/a	n/a	n/a	n/a	n/a	n/a

### Conclusion:

The site is suitable for residential development. We have received indication from the freeholder that the site could become available for development. The site is enclosed with fencing and underutilised, and it has previously been the subject of a pre-application enquiry for residential development in 2014 (8 units on this parcel). While there is one main freeholder, there is another which owns 3 former garage plots within the site, which would appear to complicate availability. However, given the main freeholder has indicated an openness to bringing the land forward for residential development, it is considered that there is a reasonable prospect that the site will become available during the plan period. This is supported by the fact that the surrounding residential area has previous history of garage blocks converting to residential housing and that the site is underutilised. Having regard to the information outlined above, the site is considered to be developable for residential use within the plan period, with an anticipated delivery timeframe of 6-10 years.

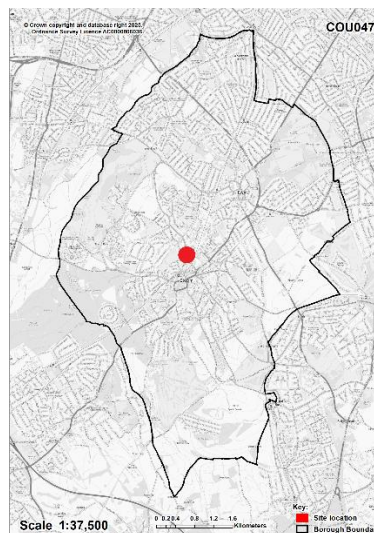
**Site address:** 85b Hook Road, Epsom

**Site reference:** COU047

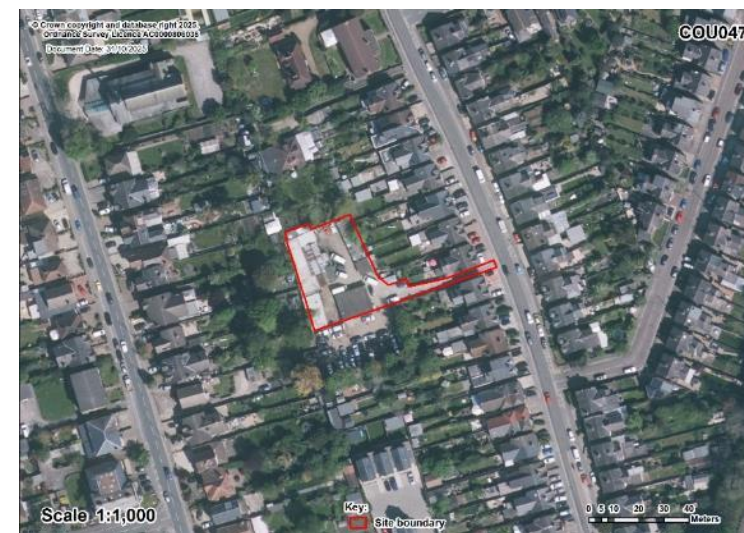
**Site location boundary:**



**Site location in Borough:**



**Satellite View:**



**Ward:** Court

**Site area:** 0.14 ha

**Source of site:**  
Assessment of the developability of 54 urban sites ([COUD 020](#))

**Site description:** The site is positioned to the rear of the residential housing along Hook Road. Access to the site is via a single track road between residential dwellings. The surrounding area comprises residential buildings. The site is an approx 10min walk south to Epsom train station and Epsom Town Centre.

**Existing land use:** Car servicing garage

**Type of Landowner:** Private (1 FH only)

**Proposed use:** Residential

**Indicative yield:** 8 units (net)

**Indicative timescale for delivery:** Developable within years 11-15

**Planning history:** No relevant planning history

**Key constraints:** None

### Transport Assessment Accessibility Scores:

Primary Schools*	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres*	Rail Stations	Green Spaces*	Total score	Rank (out of 191 sites)
4.5	2.0	3.0	3.0	4.5	3.0	4.5	24.5	4 / 191
<b>Scoring methodology:</b> 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and >30mins walk = 0 points * Primary schools, Town & Secondary Centres & Green Spaces are weighted at 1.5x; the others are weighted 1x. <b>Source:</b> <a href="#">Surrey County Council (SCC) Regulation 18 Transport Assessment</a>								

### Flood Risk Information:

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable	1	Medium (1 in 100 Year Extent) – 0.52% Low (1 in 1,000 Year Extent) – 29.07%	All of site >= 50% <75%	6 incidents within predominant postcode  Reservoir – No Risk.

### Heritage Impact:

There are no heritage assets within the site or in the locality of the site. Further information is contained in the Heritage Impact Assessment for the site.

### Ecology/environmental considerations:

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
within 500m of Kiln Lane SSSI	n/a	n/a	n/a	n/a	n/a

### Conclusion:

The site is considered suitable for residential development, acknowledging that development would likely result in the loss of the existing car servicing use and associated businesses, which would require justification and/or re-provision. While the site is within 500m of Kiln Lane SSSI, this is separated by a railway line and a significant number of existing built form. The site owner has confirmed that, whilst there is currently a longstanding tenant in occupation, they would look to sell the site in the future once the tenant vacates and has expressed interest in exploring the potential for housing redevelopment. The site is considered to have a reasonable prospect of being viably developed and achievable, given that a similar site to the rear of residential properties along Hook Road has previously been redeveloped for residential use. With overall consideration of information above, the site is considered to have a reasonable prospect of being developable for residential use within years 11-15 of the plan period.

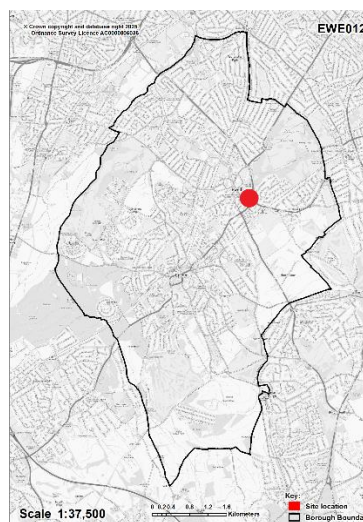
**Site address:** Land west of Ewell By-Pass

**Site reference:** EWE012

**Site location boundary:**



**Site location in Borough:**



**Satellite View:**



**Ward:** Ewell Village

**Site area:** 0.87 ha  
(developable area: 0.65 ha)

**Source of site:** Assessment of the developability of 54 urban sites ([COUD\\_020](#))

**Site description:** The site is largely undeveloped land but with a mobile home and water tank, within the Ewell Village Conservation Area and an Area of High Archaeological Potential (Ewell Roman historic core). The site is located in the built up area and adjoining the Ewell-by-Pass (A24), located to the east of the site. The surrounding area consists of residential buildings, commercial uses and a secondary school. Access to the site is currently from Ewell-by-Pass in the north-east of the site, via a gate and single track.

**Existing land use:** Open space (not accessible), mobile home, water tank on site

**Type of Landowner:** Private (1 FH, 1 LH)

**Proposed use:** Residential

**Indicative yield:** 38 units (net)

**Indicative timescale for delivery:** Developable within years 11-15

**Planning history:** No planning history

**Key constraints:** Area of High Archaeological Potential (Ewell Roman historic core), Conservation Area (Ewell Village), Article 4 area (Ewell Village Conservation Area)

## Transport Assessment Accessibility Scores:

Primary Schools	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres	Rail Stations	Green Spaces	Total score	Rank (out of 191 sites)
4.5	2.0	3.0	3.0	4.5	3.0	4.5	24.5	4 / 191
<b>Scoring methodology:</b> 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and >30mins walk = 0 points * Primary schools, Town & Secondary Centres & Green Spaces are weighted at 1.5x; the others are weighted 1x. <b>Source:</b> <a href="#">Surrey County Council (SCC) Regulation 18 Transport Assessment</a>								

## Flood Risk Information:

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable	1	High (1 in 30 Year Extent) – 3% Medium (1 in 100 Year Extent) – 10.52% Low (1 in 1,000 Year Extent) – 24.95%	All of site >= 25% <50%	20 incidents within predominant postcode  Reservoir – No Risk.

## Heritage Impact:

The site is located within the Ewell Village Conservation Area. Beyond the site boundary to the west is the Locally Listed Ice House and then to the south of the site on the opposite side of Cheam Road is the Grade II Listed Pitt House. The precise level of harm as a result of development would depend on the nature, design, and scale of proposals brought forward at the planning application stage. Further information is contained in the Heritage Impact Assessment for the site.

## Ecology/environmental considerations:

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
n/a	n/a	n/a	n/a	n/a	n/a

**Source:** [Epsom & Ewell](#) and [Surrey County Council](#) mapping information

## Conclusion:

The site is considered suitable for residential development, acknowledging that careful design would be required to account for its location within a Conservation Area, where trees are protected, and to address mitigation measures relating to its situation within an Area of High Archaeological Potential. While more than 10% of the site is covered by a medium risk of surface water flooding, and 25% at low risk, this is localised in the northern part of the site. Development could be focussed in areas so as to not increase the risk of flooding elsewhere. Access to the site is currently on a single track and gate in the north-east via Ewell By-Pass, however, if required, there is opportunity for new access in the south-west of the site via Cheam Road. Except for a single caravan on the site, the site did not appear to be extensively used; however, recent tyre tread marks were observed, indicating active use. A response has been received from the freeholder indicating an openness to bringing the site forward for residential development. While not definitively stating an intention to develop the site for housing, there is sufficient indication from the landowner and given the site's location and underutilisation, that the site has a reasonable prospect of being available for residential development over the plan period. The site is considered viable and achievable and, given the information above, and on balance, is considered to be developable for residential use within years 11–15 of the local plan period.

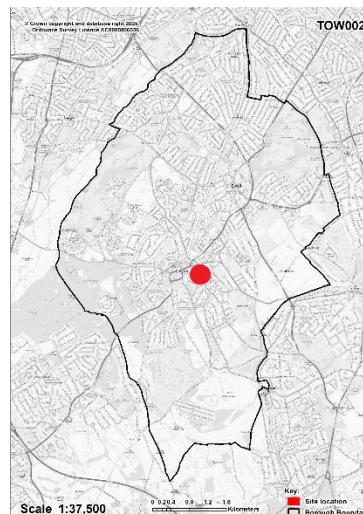
**Site address:** Conservative Club, Epsom Club and Church

**Site reference:** TOW002

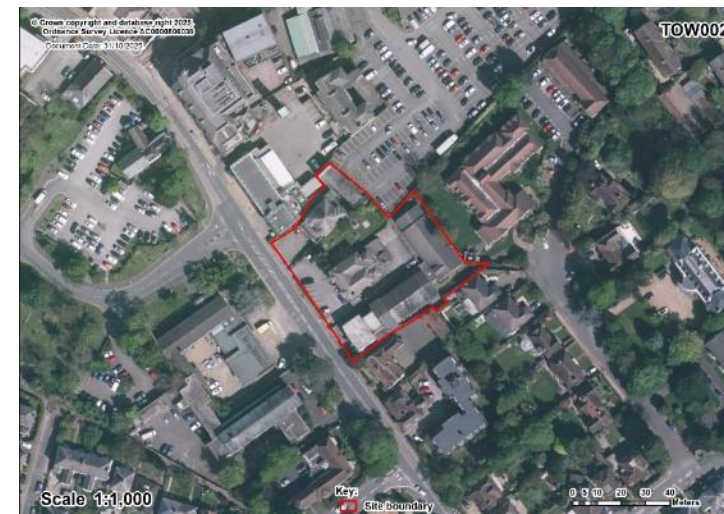
**Site location boundary:**



**Site location in Borough:**



**Satellite View:**



**Ward:** Town

**Site area:** 0.35 ha

**Source of site:** Assessment of the developability of 54 urban sites ([COUD\\_020](#))

**Site description:** The site comprises the Conservative Club, Epsom Club and a Church. The site is within the Epsom Town Centre boundary and adjacent to the Church Street Conservation Area. The site is surrounded by commercial, community and residential uses. The site forms part of the wider Depot Road and Upper High Street Opportunity Site in Plan E (2011)

**Existing land use:** Church (vacant), private members clubs (in use)

**Type of Landowner:** Private (2 FHs, Epsom Club lacking Land Registry details)

**Proposed use:** Mixed-use redevelopment (community/leisure on ground floor, residential above)

**Indicative yield:** 28 units (net)

**Indicative timescale for delivery:** Developable within years 11-15

**Planning history:** No planning history related to residential use.

**Key constraints:** TPO southern corner, adjacent to Conservation Area (Church Street).

## Transport Assessment Accessibility Scores:

Primary Schools	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres	Rail Stations	Green Spaces	Total score	Rank (out of 191 sites)
3.0	2.0	3.0	3.0	4.5	3.0	4.5	23.0	33 / 191
<b>Scoring methodology:</b> 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and >30mins walk = 0 points * Primary schools, Town & Secondary Centres & Green Spaces are weighted at 1.5x; the others are weighted 1x. <b>Source:</b> <a href="#">Surrey County Council (SCC) Regulation 18 Transport Assessment</a>								

## Flood Risk Information:

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable (residential) Less vulnerable (community uses)	1	Low (1 in 1,000 Year Extent) – 0.09%	All of site >= 25% <50%	6 incidents within predominant postcode Reservoir – No Risk.

## Heritage Impact:

The southern boundary of the site borders Church Street Conservation Area and the 17<sup>th</sup>-18<sup>th</sup> Century Grade II Listed Building ('The Hermitage'). The impact on the Grade II Listed Building ('The Hermitage') and Conservation Area would depend on the nature, design, and scale of proposals brought forward at the planning application stage. Further information is contained in the Heritage Impact Assessment for the site.

## Ecology/environmental considerations:

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
n/a	n/a	n/a	n/a	n/a	n/a
<b>Source:</b> <a href="#">Epsom &amp; Ewell</a> and <a href="#">Surrey County Council</a> mapping information					

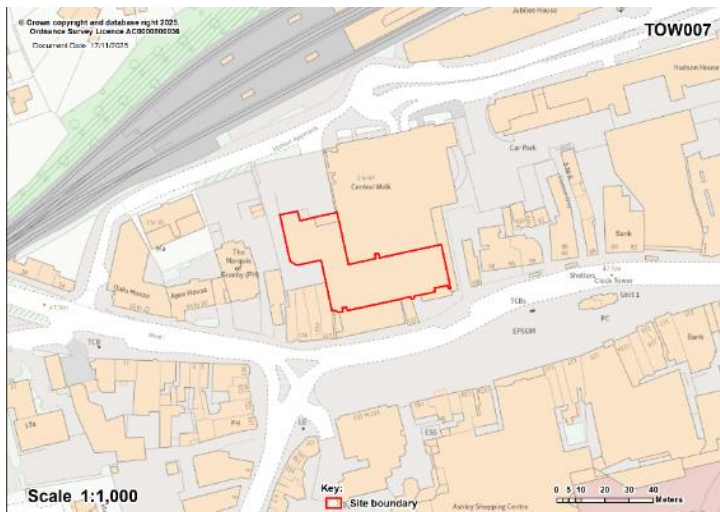
## Conclusion:

The site is in an accessible town centre location. In order to make efficient use of land it is suitable for mixed-use development, acknowledging that redevelopment would have impacts on the existing church and community uses, which would require justification or re-provision. A response received in relation to the church element of the site confirms that this part is in the process of being sold to another church operator. No responses have been received from the club owners, only one of whom has identifiable Land Registry information. While no recent indication has been received from the freeholder regarding intentions for the site as a whole, having regard to the site's location adjacent to allocation SA9 and its current allocation in Plan E (2011), the site is considered to have a reasonable prospect of becoming available. On balance, and taking the above information into account, the site is currently considered to be developable for mixed-use residential within the local plan period, specifically in years 11–15.

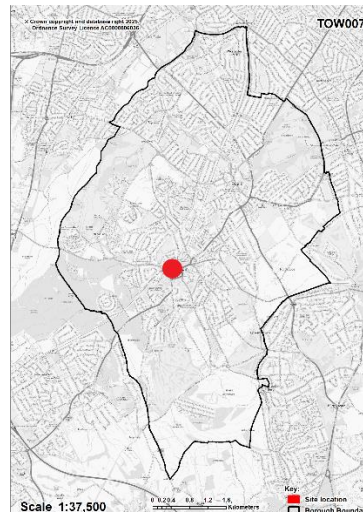
**Site address:** TK Maxx

**Site reference:** TOW007

**Site location boundary:**



**Site location in Borough:**



**Satellite View:**



**Ward:** Town

**Site area:** 0.14 ha

**Source of site:** Assessment of the developability of 54 urban sites ([COUD\\_020](#))

**Site description:** The site consists of the retail unit which fronts the High Street in the town centre. It is surrounded predominantly by commercial and community uses with some residential uses within the wider vicinity. The site is opposite the pedestrianised high street in the town centre which links to the Ashley shopping centre. The site is within the Epsom Town Centre conservation area. It is a 3 minute walk to Epsom train station and Epsom's bus services which serve the borough are located along the High Street.

**Existing land use:** Leisure and retail

**Type of Landowner:** Private (1 FH, multiple LHs)

**Proposed use:** Residential-led mixed use redevelopment

**Indicative yield:** 17 units (net)

**Indicative timescale for delivery:** Developable within years 11-15

**Planning history:** No planning history within the red line boundary. Note the site has been marketed as for sale ([link to marketing pamphlet](#)), the details of which includes reference to the Local Plan, as a 'Development Site' and that it could accommodate 65 residential units. As of mid-January 2026 there was a pending application on the Land Registry indicating a potential sale of the site, however, as of the end of March 2026 this is no longer present, indicating no change of ownership.

**Key constraints:** Primary Shopping Area, Conservation Area (Epsom Town Centre), Area of High Archaeological Potential (Epsom Historic Town Core).

## Transport Assessment Accessibility Scores:

Primary Schools	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres	Rail Stations	Green Spaces	Total score	Rank (out of 191 sites)
4.5	2.0	3.0	3.0	4.5	3.0	4.5	24.5	4 / 191
<b>Scoring methodology:</b> 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and >30mins walk = 0 points * Primary schools, Town & Secondary Centres & Green Spaces are weighted at 1.5x; the others are weighted 1x. <b>Source:</b> <a href="#">Surrey County Council (SCC) Regulation 18 Transport Assessment</a>								

## Flood Risk Information:

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable	1	High (1 in 30 Year Extent) – 3.5% Medium (1 in 100 Year Extent) – 3.5% Low (1 in 1,000 Year Extent) – 70.86%	All of site >= 50% <75%	6 incidents within predominant postcode  Reservoir – No Risk.

## Heritage Impact:

The majority of the site is located within the Epsom Town Centre Conservation Area. In close proximity to the site are multiple Grade II Listed buildings, and the Grade II\* listed Assembly Rooms located on the opposite side of the High Street. The existing building is a 2-3 storey retail building with mansard roof. This utilitarian design contributes little to the surrounding heritage assets and conservation area. The impact on the Conservation Area and Listed Buildings would depend on the nature, design, and scale of proposals brought forward at the planning application stage. Further information is contained in the Heritage Impact Assessment for the site.

## Ecology/environmental considerations:

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
n/a	n/a	n/a	n/a	n/a	n/a
<b>Source:</b> <a href="#">Epsom &amp; Ewell</a> and <a href="#">Surrey County Council</a> mapping information					

## Conclusion:

The site is in a highly accessible town centre location and in order to make efficient use of land it is considered suitable for mixed-used redevelopment with retail/leisure at ground floor and residential above. Whilst no recent indication has been received from the freeholder on the intention for the site, due to the site's location within the Epsom Town Centre boundary, its previous inclusion as a Plan E (2011) allocation, and recent evidence of marketing, the site is considered to have a reasonable prospect that it will become available. Given the information above, the site is considered to be developable for residential use in years 11-15 of the local plan period.



Primary Schools	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres	Rail Stations	Green Spaces	Total score	Rank (out of 191 sites)
4.5	3.0	3.0	3.0	4.5	3.0	4.5	25.5	1 / 191
<b>Scoring methodology:</b> 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and >30mins walk = 0 points * Primary schools, Town & Secondary Centres & Green Spaces are weighted at 1.5x; the others are weighted 1x. <b>Source:</b> <a href="#">Surrey County Council (SCC) Regulation 18 Transport Assessment</a>								

### Flood Risk Information:

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable (residential)	1	Low (1 in 1,000 Year Extent) – 0.02%	All of site >= 50% <75%	16 incidents within predominant postcode  Reservoir – No Risk.

### Heritage Impact Assessment:

The site is located within the Epsom Town Centre Conservation Area and on the western boundary of the site is a Grade II Listed Wall. In close proximity to the site are multiple Grade II Listed Buildings. The impact on the Conservation Area and Listed Buildings and structures would depend on the nature, design, and scale of proposals brought forward at the planning application stage. Further information is contained in the Heritage Impact Assessment for the site.

### Ecology/environmental considerations:

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
n/a	n/a	n/a	n/a	n/a	n/a
<b>Source:</b> <a href="#">Epsom &amp; Ewell</a> and <a href="#">Surrey County Council</a> mapping information					

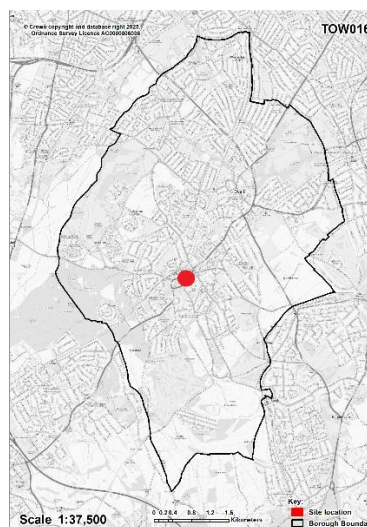
### Conclusion:

The site is in a highly accessible town centre location and in order to make efficient use of land it is considered suitable for mixed use (residential & employment) development, acknowledging that redevelopment would likely result in the loss of the existing light industrial use (motor vehicle repair). In terms of availability, a response from the landowner confirms that they would be open to the idea of developing the site in the future, indicating a reasonable prospect that the site will become available within the plan period. The site is identified as an Opportunity Site in Plan Epsom (2011), with an allocation for mixed-use development comprising up to 8 residential units and approximately 500 sqm of employment floorspace. However, it is noted that there is no relevant planning history associated with the site to date. The site is considered to have reasonable prospects of being viably developed and delivered, and, based on the information currently available, is assessed as developable for residential use within years 11–15 of the plan period.

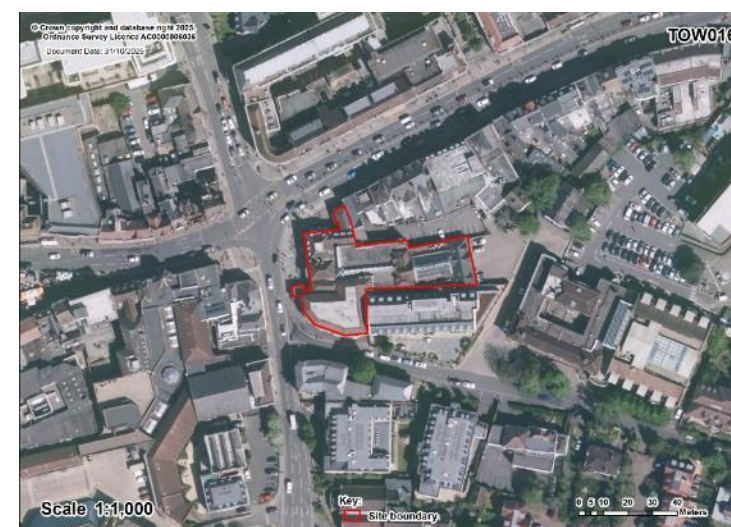
**Site location boundary:**



**Site location in Borough:**



**Satellite View:**



**Ward:** Town

**Site area:** 0.18 ha

**Source of site:**

Assessment of the developability of 54 urban sites ([COUD 020](#))

**Site description:** The site consists of a Grade II Listed Building (Spread Eagle Hotel and No 89 High Street) but this is not the whole of the site. The site contains various small retail units with a walkthrough and is positioned on a prominent corner location at the junction of Waterloo Road, Ashley Road and High Street. The site is within the Epsom Town Centre boundary and Conservation Area. Pedestrian access to the site is from the west and north-west of the site, with the site also adjoining a Council-owned car park to the east.

**Existing land use:** Retail/leisure/commercial

**Type of Landowner:** Private (1 FH, ~5 LHs)

**Proposed use:** Residential-led mixed use redevelopment (student accommodation & leisure/retail on ground floors)

**Indicative residential yield:** 22 units (C3 equivalent) (net)

**Indicative timescale for delivery:** Developable within years 11-15

**Planning history:** The site has previously been subject to pre-application discussions in 2016 regarding mixed use, including residential development for 35 flats.

**Key constraints:** Conservation Area (Epsom Town Centre), Primary Shopping Area, Grade II Listed Building (Spread Eagle Hotel and No 89 High Street), Area of High Archaeological Potential (Epsom Historic Town Core), Other Listed Buildings nearby

### Transport Assessment Accessibility Scores:

Primary Schools	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres	Rail Stations	Green Spaces	Total score	Rank (out of 191 sites)
3.0	2.0	3.0	3.0	4.5	3.0	4.5	23.0	33 / 191
<b>Scoring methodology:</b> 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and >30mins walk = 0 points * Primary schools, Town & Secondary Centres & Green Spaces are weighted at 1.5x; the others are weighted 1x. <b>Source:</b> <a href="#">Surrey County Council (SCC) Regulation 18 Transport Assessment</a>								

### Flood Risk Information:

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable	1	Low (1 in 1,000 Year Extent) – 6.20%	All of site >= 50% <75%	6 incidents within predominant postcode  Reservoir – No Risk.

### Heritage Impact:

The majority of the site is located within the Epsom Town Centre Conservation Area. The site includes a Grade II Listed building (Spread Eagle Hotel and No. 89) and adjoins a Locally Listed Building. The impact on the Conservation Area and Listed Buildings would depend on the nature, design, and scale of proposals brought forward at the planning application stage. Further information is contained in the Heritage Impact Assessment for the site.

### Ecology/environmental considerations:

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
n/a	n/a	n/a	n/a	n/a	n/a
<b>Source:</b> <a href="#">Epsom &amp; Ewell</a> and <a href="#">Surrey County Council</a> mapping information					

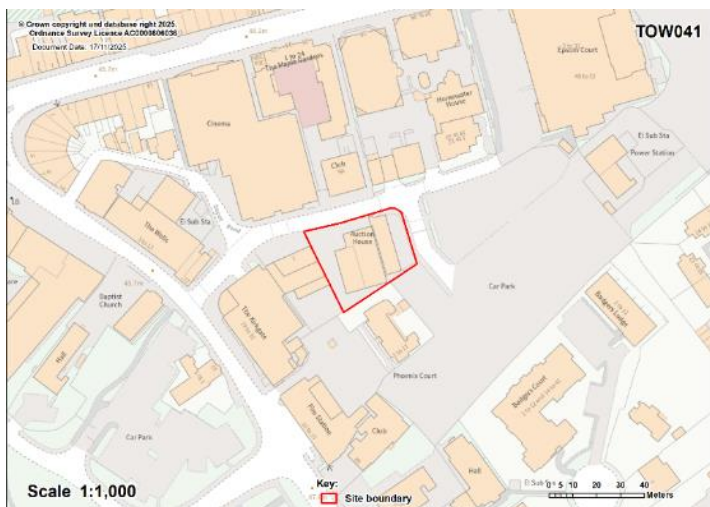
### Conclusion:

The site is in a highly accessible town centre location and in order to make efficient use of land it is considered suitable for mixed use development (incl. student accommodation), with retention of retail/leisure on ground floors. Sensitive design would also be required to address potential impacts on the listed building. As a result we would guide development away from the Listed Building within the site. While site is currently well occupied, with a number of active leaseholds there have been pre-application discussions on the site indicating previous interest in developing the site for mixed use development. As a result, the site is considered to have a reasonable prospect of becoming available for residential redevelopment during the plan period. Given the information above, the site is considered developable for residential use within years 11-15 of the local plan period.

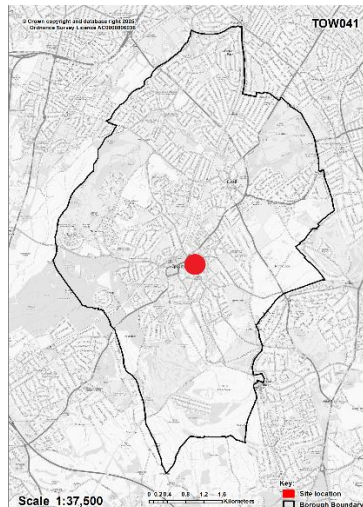
**Site address:** Auction House, Depot Road

**Site reference:** TOW041

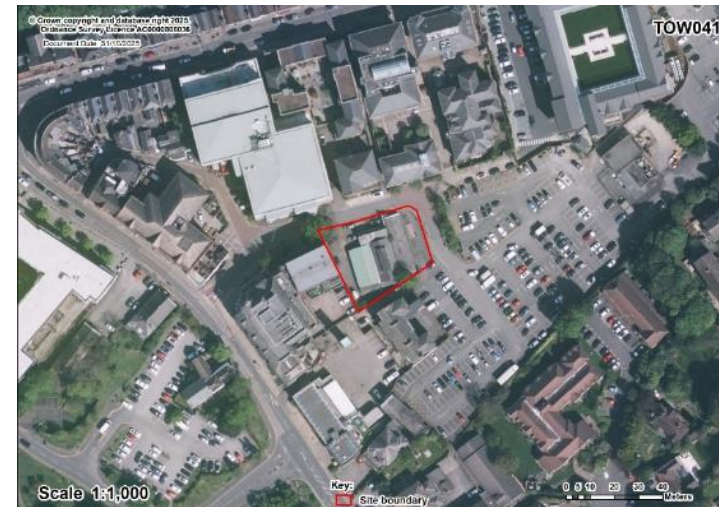
**Site location boundary:**



**Site location in Borough:**



**Satellite View:**



**Ward:** Town

**Site area:** 0.12 ha

**Source of site:** Assessment of the developability of 54 urban sites ([COUD\\_020](#))

**Site description:** The site comprises of various commercial/industrial/leisure uses set in single storey units accessed from Depot Road. It is within the Epsom Town Centre Boundary and the Epsom Town Centre Conservation Area is within the wider vicinity. The surrounding area comprises of a public car parking area, commercial uses, community uses and some residential housing in the wider vicinity. The site is adjacent to a car park site (SA9) allocated for residential-led redevelopment,

**Existing land use:** Leisure and commercial (motor serv. & escape room)

**Type of Landowner:** Private (3 FHs, 2 owners)

**Proposed use:** Mixed use (residential & commercial/leisure)

**Indicative yield:** 10 units (net)

**Indicative timescale for delivery:** Developable within years 11-15

**Planning history:** None on site, but part of a Plan E (2011) strategic opportunity site (Depot Road & Upper High Street) for mixed use (130 dwellings, 2,000sqm retail & community uses).

**Key constraints:** None

### Transport Assessment Accessibility Scores:

Primary Schools	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres	Rail Stations	Green Spaces	Total score	Rank (out of 191 sites)
3.0	2.0	3.0	3.0	4.5	3.0	4.5	23.0	33 / 191
<p><b>Scoring methodology:</b> 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and &gt;30mins walk = 0 points            * Primary schools, Town &amp; Secondary Centres &amp; Green Spaces are weighted at 1.5x; the others are weighted 1x.  <b>Source:</b> <a href="#">Surrey County Council (SCC) Regulation 18 Transport Assessment</a></p>								

### Flood Risk Information:

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable	1	Low (1 in 1,000 Year Extent) – 15.63%	All of site >= 25% <50%	6 incidents within predominant postcode  Reservoir – No Risk.

### Heritage Impact:

There are no heritage assets within the site or in the immediate locality of the site. Further information is contained in the Heritage Impact Assessment for the site.

### Ecology/environmental considerations:

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
n/a	n/a	n/a	n/a	n/a	n/a

**Source:** [Epsom & Ewell](#) and [Surrey County Council](#) mapping information

### Conclusion:

The site is in a town centre location with good accessibility to services and transport. It is suitable for mixed-use development with retention of existing commercial uses. Whilst no recent indication has been received from the freeholder on intentions for the site, due to the site's location within the Epsom Town Centre boundary and its inclusion as a Plan E (2011) allocation, the site is considered to have a reasonable prospect that it will become available. Given the information above, the site is considered to be developable for residential use in years 11-15 of the local plan period.

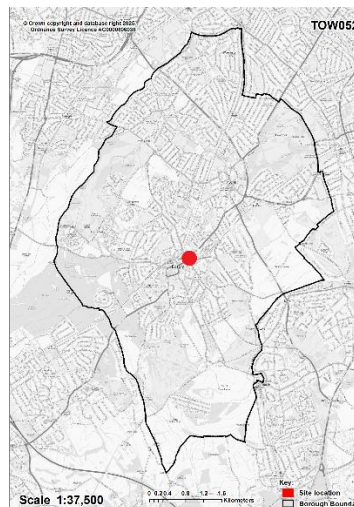
# Site address: Laine Theatre Arts

# Site reference: TOW052

Site location boundary:



Site location in Borough:



Satellite View:



**Ward:** Town

**Site area:** 0.05 ha

**Source of site:** Assessment of the developability of 54 urban sites ([COUD\\_020](#))

**Site description:** The site is occupied by a 3-storey theatre arts studio, and is located to the rear commercial buildings on East Street. The site is accessed via a lane that runs between 16A Victoria House and Emerald House (fronting East Street). The surrounding area comprises a mix of predominantly commercial and some residential buildings. The Listed Building (Flint House) is adjacent to the site. The Adelphi Road Conservation Area is also adjoins the site boundary. The southern boundary of the site is bordered by a railway line and vegetation.

**Existing land use:** Education facility

**Type of Landowner:** Private (1 FH only)

**Proposed use:** Residential

**Indicative yield:** 6 units (net)

**Indicative timescale for delivery:** Developable within years 6-10

**Planning history:** None relevant

**Key constraints:** Adjacent Conservation Area (Adelphi Road), Adjacent Listed Building (Flint House).

### Transport Assessment Accessibility Scores:

Primary Schools	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres	Rail Stations	Green Spaces	Total score	Rank (out of 191 sites)
3.0	2.0	3.0	3.0	4.5	3.0	4.5	23.0	33 / 191
<b>Scoring methodology:</b> 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and >30mins walk = 0 points * Primary schools, Town & Secondary Centres & Green Spaces are weighted at 1.5x; the others are weighted 1x. <b>Source:</b> <a href="#">Surrey County Council (SCC) Regulation 18 Transport Assessment</a>								

### Flood Risk Information:

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable	1	Low (1 in 1,000 Year Extent) – 4.44%	All of site >= 25% <50%	20 incidents within predominant postcode Reservoir – No Risk.

### Heritage Impact:

There are no heritage assets within the site. Adjoining the eastern boundary is the Grade II Listed Flint Cottage. Adjoining the Western boundary is the Adelphi Road Conservation Area. The impact on the Conservation Area and Listed Building would depend on the nature, design, and scale of proposals brought forward at the planning application stage Further information is contained in the Heritage Impact Assessment for the site.

### Ecology/environmental considerations:

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
n/a	n/a	n/a	n/a	n/a	n/a
<b>Source:</b> <a href="#">Epsom &amp; Ewell</a> and <a href="#">Surrey County Council</a> mapping information					

### Conclusion:

The site is suitable for residential development. Development of the site would result in the loss of the existing education use which is to be re-provided as part of the SGN allocation. The freeholder has confirmed their intention to relocate to the nearby SGN site and make the existing site available for residential and/or student accommodation following relocation. They have stated that they expect the site to be available in 2030. The site is considered to have a reasonable prospect that it could be viably developed and achievable in the future. Given the information above, the site is considered to be developable for residential use in years 6-10 of the local plan period.

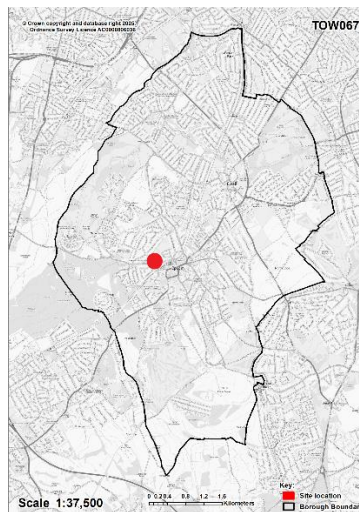
**Site address:** Eclipse Business Park, West Hill

**Site reference:** TOW067

**Site location boundary:**



**Site location in Borough:**



**Satellite View:**



**Ward:** Town

**Site area:** 0.39 ha

**Source of site:** Assessment of the developability of 54 urban sites ([COUD\\_020](#))

**Site description:** The site is comprised of a number of dated single to 2-storey workshops and warehouses. It is accessed off West Hill which is a key route into Epsom Town Centre. The site contains a mixture of businesses including commercial uses and some light industrial in buildings of varying size. The site is surrounded by residential uses and community uses in the wider vicinity. Court recreation ground is located adjacent to the rear of the site.

**Existing land use:** Commercial and light industrial

**Type of Landowner:** Private (1 FH, multiple LHs)

**Proposed use:** Mixed use (residential & employment)

**Indicative yield:** 23 units (net)

**Indicative timescale for delivery:** Developable within years 11-15

**Planning history:** Permission for residential housing was granted on the site (although not implemented) in 1979 for 30 flats (referenced in planning application 97/00460/REM on the site).

**Key constraints:** Part Conservation Area (Stamford Green), Area of High Archaeological Potential (Epsom Historic Town Core).

### Transport Assessment Accessibility Scores:

Primary Schools	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres	Rail Stations	Green Spaces	Total score	Rank (out of 191 sites)
4.5	2.0	3.0	3.0	4.5	3.0	4.5	24.5	4 / 191

**Scoring methodology:** 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and >30mins walk = 0 points  
 \* Primary schools, Town & Secondary Centres & Green Spaces are weighted at 1.5x; the others are weighted 1x.  
**Source:** [Surrey County Council \(SCC\) Regulation 18 Transport Assessment](#)

### Flood Risk Information:

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable (residential) Less vulnerable (employment)	1	Low (1 in 1,000 Year Extent) – 7.89%	All of site >= 50% <75%	6 incidents within predominant postcode  Reservoir – No Risk.

### Heritage Impact:

A small part of the site is located within the Stamford Green Conservation Area. There are no other heritage assets within the immediate vicinity of the site. The impact on the Conservation Area would depend on the nature, design, and scale of proposals brought forward at the planning application stage. Part of the site is Area of High Archaeological Potential. Further information is contained in the Heritage Impact Assessment for the site.

### Ecology/environmental considerations:

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
n/a	n/a	n/a	n/a	n/a	n/a

**Source:** [Epsom & Ewell](#) and [Surrey County Council](#) mapping information

### Conclusion:

The site is in a sustainable location close to the Town Centre and is suitable for residential led mixed use development. Development could be focused to the rear of the site, where a mixed-use scheme is more suitable, given the existing ground floor uses. A response from the landowner has been received indicating that they are considering the longer term use of the site and currently exploring options. Therefore, the site is considered to have a reasonable prospect that it will become available. The site is considered viable and achievable and given the information above, the site is considered to be developable for residential use in years 11-15 of the local plan period.



# 3. Green Belt Sites

3.1. The following **Table 5** provides a summary of which of the Green Belt sites should be progressed for further consideration as to whether they could be included as allocations in the Local Plan through the Inspectors main modifications to the Local Plan. The table demonstrates that 5 sites are recommended to progress for further assessment at this stage. The others which are discounted are listed with their various reasons for discounting.

**Table 5:** List of Green Belt sites to progress for further consideration or discount

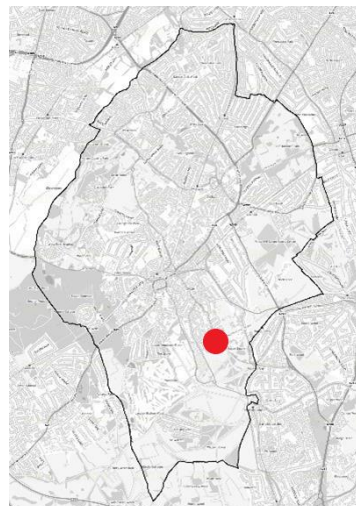
Site name	LAA ref	Site Area (ha)	Progress for further assessment or discount
Land West of Burgh Heath Road	COL017	1.52	Progress
Cuddington Glade	HOR001	0.52	Progress
Manor Park	HOR003	6.2	Discount - The site is considered to be an important ecological corridor and has been <a href="#">recently designated</a> a Site of Nature Conservation Importance (SNCI). The site is also a potential site to deliver off site Biodiversity Net Gain.
Land off Cuddington Glade	HOR004	1.11	Progress
Nobble Park Extension	HOR007	7.32	Discount - The site lies between Epsom Common SSSI to the south and Horton Country Park SNCI to the north. The site is considered to be an important ecological corridor. Access to the site may also be difficult, with the existing access being through the allotments.
Land South of West Part Cottage , Livingstone Park	HOR011	0.5	Discount - The site is considered to be too small to accommodate 5 or more dwellings, given the recent planning applications for a single dwelling (ref: 24/00588/OUT) and 2-dwellings (ref: 25/00908/OUT) as well as the existing TPOs on the site limiting the scope for development.
Clarendon Park	HOR012	1.96	Discount - The site is an open amenity space, southern part is SNCI and TPO coverage.
Horton Hospital, Livingstone Park	HOR014	10.58	Discount - The site is an open amenity space, the southern part is SNCI and is adjacent to Livingstone Park estate.
Land at Priest Hill	NON013	8.63	Progress
Downs Farm (Northern Parcel)	NON016	27.9	Progress
The Looe, Reigate Road	NON040	0.4	Discount – PDL site – Planning permission granted in 2026 for intensification of employment uses at the site

- 3.2. Of the five sites that progress for further assessment detailed proformas have been prepared that contain information on the following matters:
- 3.2.1. Transport and Accessibility (including data sourced from the Regulation 18 Transport Assessment 2023 (document reference: [IS06](#))
  - 3.2.2. Flood risk (based on the data underpinning the Epsom and Ewell Strategic Flood Risk Assessment Level 1 2024 – document reference [NE06](#))
  - 3.2.3. Heritage Assets within and in the locality of the site.
  - 3.2.4. Environmental considerations (including data sourced from the Site Assessment Methodology – document reference [HB05](#)) and identifying whether any sites are located within the Borough’s three Biodiversity Opportunity Areas.
  - 3.2.5. The types of development that could potentially be delivered at the sites and any identified infrastructure needs.

**Site location boundary:**



**Site location in Borough:**



**Satellite View:**



**Ward:** College

**Site area:** 1.52 ha

**Source of site:** LAA 2022/24 (Call for Sites)

**Site description:** An agricultural field located at the southern edge of settlement, north of Epsom Downs, adjoining the defined urban area with residential properties to the North. The surrounding area comprises of various paddocks and stables. The eastern boundary abuts Burgh Heath Road and western boundary lies adjacent to a public bridleway. The boundaries are well vegetated, screening most of the site from view, however glimpses of the site are visible, particularly to the NW corner of the site which is elevated above the existing properties on Beech Road. The site is rectangular in shape, well defined on all sides except the southern boundary which does not follow a physical feature but follows the boundary South Hatch Stables (racehorse training facility) which is currently undergoing redevelopment. There are urban features, particularly to the north as it adjoins the existing urban area and the adjoining properties along Beech Road which create a defined settlement edge.

The site promoters ([Reg19 REP148](#)) have submitted a sketch masterplan of how the site could be developed. The site would be a cul-de-sac with single vehicular access from Burgh Heath Road and pedestrian access along Rifle Butts Ally and will include a small area of amenity green space. The masterplan includes a vegetated boundary treatment, reflecting the existing boundary treatment to the north, east and west.

**Existing land use:** Grass field

**Type of Landowner:** Private (1 FH)

**Proposed use:** Residential (indicative masterplan submitted at [Reg 19 REP148](#))

**Indicative yield:** 50 units (net)  
**Indicative timescale for delivery:** Developable 11-15 years

**Planning history:** 21/00132/FUL & 16/01303/FUL - Vehicular access and gate (**Refused**)

**Key constraints:** Green Belt, Area of High Archaeological Potential (Bronze Age Auroch findspot), Group TPO on northern edge of site bordering site boundary

### Transport Assessment Accessibility Scores:

Primary Schools	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres	Rail Stations	Green Spaces	Total score	Rank (out of 191 sites)	Rank (out of 26 Green Belt sites)
3.0	0.0	1.0	1.0	3.0	1.0	3.0	12.0	181 / 191	17 / 26

**Scoring methodology:** 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and >30mins walk = 0 points

\* Primary schools, Town & Secondary Centres & Green Spaces are weighted at 1.5x; the others are weighted 1x.

**Source:** [Surrey County Council \(SCC\) Regulation 18 Transport Assessment](#)

**Nearest train station:**

- Epsom Downs: 1.1 miles (25 mins walk); and
- Epsom: 1.2 miles (26 mins walk).

**Nearest bus stops and routes:**

- At Beech Road, Aston Way 318 (Epsom to Banstead) Weekday service only (Infrequent, 3 services day)
- At Treadwell Road 617, 619 (school bus)

### Flood Risk Information:

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable	1	None	All of site >= 25% <50%	6 incidents within predominant postcode  Reservoir – No Risk.

### Heritage Impact:

The site is an Area of High Archaeological Potential. There are no listed buildings or structures within the site or in the locality. Further information is contained in the Heritage Impact Assessment for the site.

### Ecology/environmental considerations:

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
n/a	n/a	n/a	n/a	n/a	<a href="#">ND04 North Downs / Epsom Downs</a>

**Source:** [Epsom & Ewell](#) and [Surrey County Council](#) mapping information

## Indicative Masterplan (sourced from Regulation 19 representation – REP148)



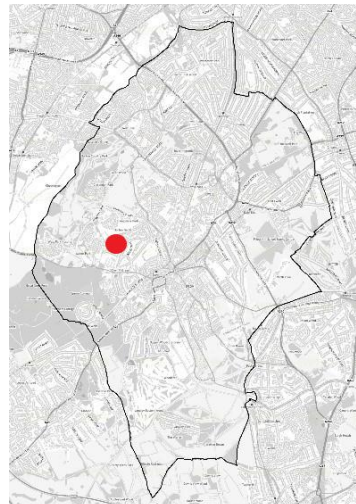
### Conclusion:

The site is located to the southern edge of the defined urban area boundary. There are no significant environmental or heritage constraints on the site, although the site is located in an Area of High Archaeological Potential which would require further investigation at the planning application stage. Although the site performs relatively poorly in terms of accessibility to key services and facilities compared to other sites in the Green Belt, there are bus stops nearby with services (currently infrequent) that operate between Epsom and Banstead. It is a greenfield site located between the existing urban area boundary and the South Hatch Stables development to the south, and in effect forms a gap between developed areas. To conclude, on balance, it is considered the redevelopment of the site would result in the development of a modest gap between the urban area and a site undergoing redevelopment, and whilst there are some constraints these are considered mitigable or further investigation would be required, and therefore the site should be considered for potential allocation.

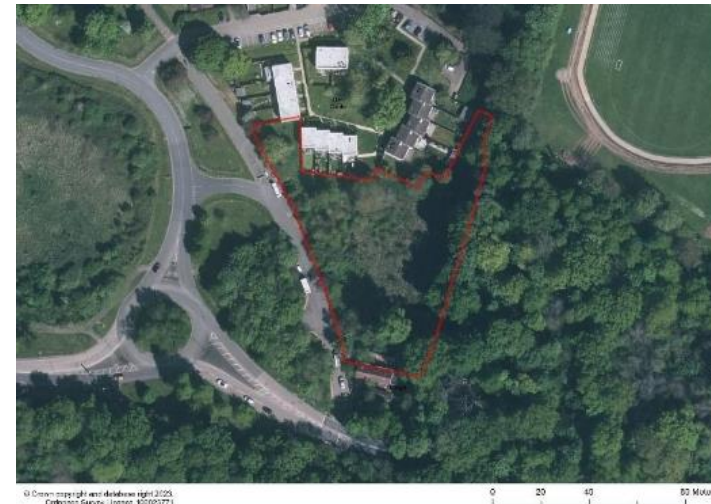
**Site location boundary:**



**Site location in Borough:**



**Satellite View:**



**Ward:** Horton

**Site area:** 0.52 ha

**Source of site:** LAA 2022/24 (Call for Sites)

**Site description:** The site is a small triangular area of semi natural amenity land/open space adjacent a small number of residential properties to the north. The site contains some TPO trees to the east, is gated off and does not appear to be publicly accessible. It adjoins a woodland area also covered by TPOs. The site sits a short distance away from the Epsom Common SSSI which is located to the south of the site on the opposite side of Christ Church Road. The site is within the Green Belt detached from the defined Urban Area boundary but is located adjacent to a small number of residential properties to the north that are located within the Green Belt.

The site promoters ([REG19 REP153 NEXUS](#)) are proposing the site is used for specialist care accommodation but have not provided a concept plan for the site. There is currently a live application for a 70 bed (C2) Care Home (ref: 26/00002/FUL).

**Existing land use:** Semi natural amenity land/open space

**Type of Landowner:** Private (1 FH)

**Proposed use:** Residential (specialist accommodation – care home)

**Indicative yield:** 70 C2 units (net)

**Indicative timescale for delivery:** Deliverable within 5 years

**Planning history:** There is currently a live application for a 70 bed (C2) Care Home - [26/00002/FUL](#).

**Key constraints:** Green Belt; multiple TPO on east side of site; single TPO on southern portion; southern boundary within 50m of a Site of Special Scientific Interest (Epsom Common SSSI).

## Transport Assessment Accessibility Scores:

Primary Schools	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres	Rail Stations	Green Spaces	Total score	Rank (out of 191 sites)	Rank (out of 26 Green Belt sites)
4.5	1.0	1.0	2.0	3.0	2.0	4.5	18.0	131 / 191	3 / 26
<p><b>Scoring methodology:</b> 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and &gt;30mins walk = 0 points            * Primary schools, Town &amp; Secondary Centres &amp; Green Spaces are weighted at 1.5x; the others are weighted 1x.  <b>Source:</b> <a href="#">Surrey County Council (SCC) Regulation 18 Transport Assessment</a></p> <p><b>Nearest train station:</b></p> <ul style="list-style-type: none"> <li>Epsom 0.9 miles (18 mins walk)</li> </ul> <p><b>Nearest bus stops and routes:</b></p> <ul style="list-style-type: none"> <li>Along Church Road (0.2 mile from site, 3 min walk) E9 Epsom-Manor Park (every 30 mins) Mon-Sat, reduced Service Sun. E10 Epsom-Noble Park every 30 mins) Mon-Sat, reduced Service Sun.</li> </ul>									

## Flood Risk Information:

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable	1	None	All of site <= 25%	6 incidents within predominant postcode Reservoir – No Risk.

## Heritage Impact:

There are no heritage assets within the site or in the immediate locality. Further information is contained in the Heritage Impact Assessment for the site.

## Ecology/environmental considerations:

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
Within 50m of Epsom Common SSSI	n/a	n/a	n/a	n/a	n/a
<b>Source:</b> <a href="#">Epsom &amp; Ewell</a> and <a href="#">Surrey County Council</a> mapping information					

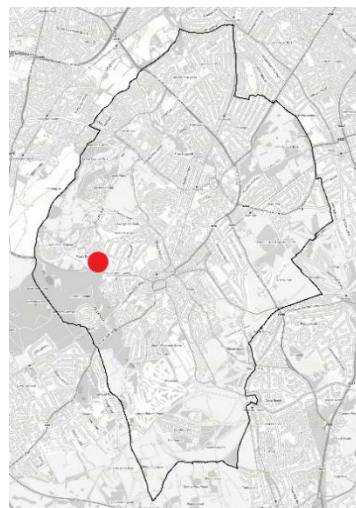
## Conclusion:

The site is located to the western edge of the borough adjacent to a small housing estate known as Oak Glade. There are no significant environmental constraints on the site. The site performs well in terms of accessibility to key services and facilities compared to other Green Belt sites and regular bus service to the town centre can be accessed a short distance from the site. In terms of constraints there are TPOs on east side of the site which would require consideration in the design of the site. The site is within 50m of the Epsom Common SSSI but given size and the nature of the proposed use for a care home the impact from additional recreational use on the SSSI is considered to be limited. To conclude, the site would result in the natural rounding off the built form here and the identified constraints are mitigable, on balance the site should be considered for potential allocation.

**Site location boundary:**



**Site location in Borough:**



**Satellite View:**



**Ward:** Horton

**Site area:** 1.11 ha

**Source of site:** LAA 2022/24 (Call for Sites)

**Site description:** The site is an irregular shaped area of public open space consisting of amenity grassland, sandwiched between two residential areas located to the North and South, although these are not within the Defined Urban Area. The residential development to the north is a former hospital site which has been redeveloped and to the south a smaller established cluster of dwellings. The site is self contained with semi natural qualities with scattered trees (TPO) which reflects the character of the surrounding area. The site is located in the vicinity of Epsom Common SSSI, which is located 150-200m south of the site. The character of the area is modern residential development scattered in a semi natural parkland setting. To the east, the site borders Stamford Green Primary School. The site promoters ([REG 19 REP159](#)) are proposing the site be developed into residential and have submitted a vision document including a concept plan to support their site. This shows vehicular access from Cuddington Glade with footpaths joining the existing public footpaths to the north.

**Existing land use:** Undeveloped green space

**Type of Landowner:** Private (1 FH)

**Proposed use:** Residential

**Indicative yield:** 50 units (net)

**Indicative timescale for delivery:** Developable within 6-10 years

**Planning history:** None

**Key constraints:** Green Belt; Green space; 3 group TPOs within site (significant in south-east of site)

### Transport Assessment Accessibility Scores:

Primary Schools	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres	Rail Stations	Green Spaces	Total score	Rank (out of 191 sites)	Rank (out of 26 Green Belt sites)
4.5	1.0	1.0	2.0	3.0	1.0	4.5	17.0	141 / 191	5 / 26

**Scoring methodology:** 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and >30mins walk = 0 points

\* Primary schools, Town & Secondary Centres & Green Spaces are weighted at 1.5x; the others are weighted 1x.

**Source:** [Surrey County Council \(SCC\) Regulation 18 Transport Assessment](#)

**Nearest train station:**

- Epsom 0.9 miles (18 mins walk)

**Nearest bus stops and routes:**

- Along Church Road (0.2 mile from site, 4 min walk) E9 Epsom-Manor Park (every 30 mins) Mon-Sat, reduced Service Sun. E10 Epsom-Noble Park every 30 mins) Mon-Sat, reduced Service Sun.

### Flood Risk Information:

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable	1	Low (1 in 1,000 Year Extent) – 2.77%	All of site <= 25%	6 incidents within predominant postcode Reservoir – No Risk.

**Note:** The Lead Local Flood Authority has indicated that their records show an Ordinary Watercourse may be located along the eastern site boundary, which should be accommodated within the site layout. If development is to affect an Ordinary Watercourse the Lead Local Flood Authority should be contacted to obtain prior written consent.

### Heritage Impact:

There are no heritage assets within the site or in the immediate locality. Further information is contained in the Heritage Impact Assessment for the site.

### Ecology/environmental considerations:

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
Within 50-200m of Epsom Common SSSI	n/a	n/a	n/a	n/a	n/a

**Source:** [Epsom & Ewell](#) and [Surrey County Council](#) mapping information

## Indicative Masterplan (sourced from Regulation 19 representation – REP159)



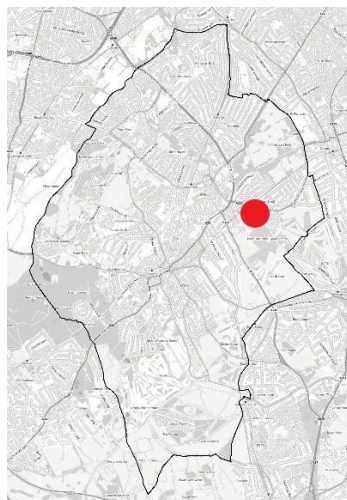
### Conclusion:

The site is located in the Green Belt beyond the defined Urban Area but is located adjacent to a small housing estate known as Oak Glade and in close proximity to an established residential area. There are no significant environmental constraints on the site. The site performs well in terms of accessibility to key services and facilities compared to other Green Belt sites and regular bus service to the town centre is available nearby. There are TPOs in the south east of the site of the site which would require consideration at the planning application stage. To conclude, the site would essentially fill in a gap between two established residential areas, deliver additional homes and the identified constraints are mitigable. On balance, the site should be considered for potential allocation.

**Site location boundary:**



**Site location in Borough:**



**Satellite View:**



**Ward:** Nonsuch

**Site area:** 8.63 ha

**Source of site:** LAA 2022/24 (Call for Sites)

**Site description:** The site consists of open space/playing fields (approximately 78%) and previously developed land to the north-comprising of hard surfacing and former tennis courts. The site borders the railway line, Cheam Road (the A232) and Banstead Road, with public rights of way to the north (parallel to the railway line), west (along the boundary with Nescot College) and south of the site where Priest Hill Nature Reserve is located.

Ewell East Station is located adjacent to the site and established residential areas border the site to the north and east. The Nature Reserve located beyond the site boundary to the south-east is a Site of Nature Conservation Importance (SNCI) and to the west of the site is a Public Right of Way beyond which are the NESCOL playing fields.

The site promoters ([REG19 REP163 Carter Jonas on Coldunell](#)) have submitted supporting information and an illustrative masterplan and most recently pre-application report/document as part of their Regulation 19 response. The latter promotes the site in two phases comprising the development of the site into 283 dwellings to the northern half, with the second phase (on 3.7ha of land that are currently on a long lease to a local sports club) developed into 161 dwellings and a central green park/square and linear park along/green buffer on the southern boundary.

**Existing land use:** Playing fields and PDL (hard surfacing and former tennis courts)

**Type of Landowner:** Private (1 FH, 2 long LHs)

**Proposed use:** Residential and retail uses (4.9ha) and the retention of sports playing fields on land to the south of the site (3.7ha).

**Indicative yield:** 275 units (net)

**Indicative timescale for delivery:** Part deliverable within 5 years & part developable within 6-10 years

**Planning history:** Live pre-application & pre application public consultation undertaken by the developer in 2026.

**Key constraints:** Green Belt; Playing fields.

**Transport Assessment Accessibility Scores:**

Primary Schools	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres	Rail Stations	Green Spaces	Total score	Rank (out of 191 sites)	Rank (out of 26 Green Belt sites)
3.0	1.0	1.0	2.0	3.0	3.0	3.0	16.0	156 / 191	10 / 26

**Scoring methodology:** 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and >30mins walk = 0 points  
 \* Primary schools, Town & Secondary Centres & Green Spaces are weighted at 1.5x; the others are weighted 1x.

**Source:** [Surrey County Council \(SCC\) Regulation 18 Transport Assessment](#)

**Nearest train station:**

- Ewell East (adjacent, to the north west of the site along public right of way)

**Nearest bus stops and routes:**

- Multiple stops along Cheam Road, S2 Regular service every 15-20 mins Epsom to St Helier Station

**Flood Risk Information:**

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable	1	High (1 in 30 Year Extent) – 0.12% Medium (1 in 100 Year Extent) – 0.34% Low (1 in 1,000 Year Extent) – 0.98%	29.3% of site <= 25% 70.7% of site >= 25% <50%	2 incidents within predominant postcode  Reservoir – No Risk.

**Heritage Impact:**

There are no heritage assets within the site. The Locally Listed Glyn Arms is located in relative proximity to the site in distance terms; however, the railway, topography and existing built form sever any sense of connection. Further information is contained in the Heritage Impact Assessment for the site.

**Ecology/environmental considerations:**

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
n/a	Adjacent to SNCI	n/a	n/a	n/a	<a href="#">ND04 North Downs / Epsom Downs</a>

**Source:** [Epsom & Ewell](#) and [Surrey County Council](#) mapping information

## Indicative Masterplan (sourced from Regulation 19 representation – REP163)



Phase 1 of the proposed masterplan with the RFC still occupying the southern half of the site



Phase 2 of the proposed masterplan

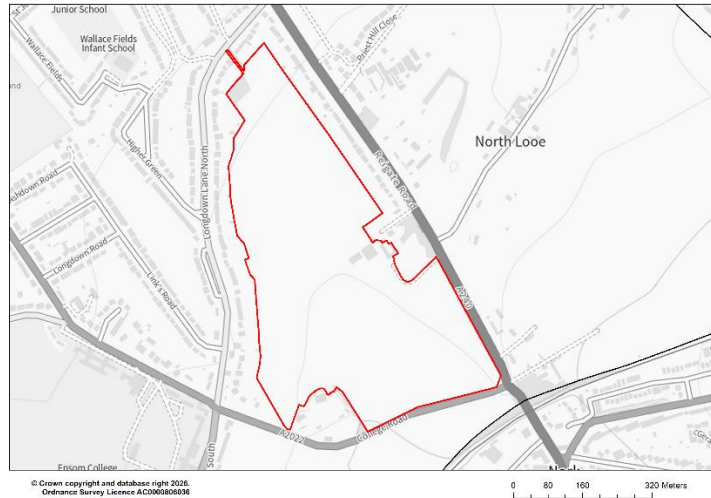
### Conclusion:

The site is used as playing fields but is not publicly accessible. It is adjacent to the urban area and located next to Ewell East Station. There are no significant environmental constraints on the site. It performs moderately in terms of accessibility to key services and facilities compared to other Green Belt sites and is located adjacent to Ewell East Station, a well serviced station with regular (1-2 trains per hour) to London Victoria, London Bridge, Dorking & Epsom. A regular bus service to Epsom town centre and Sutton is available close by along Cheam Road. In terms of constraints the main concern is the loss of playing fields that are actively used. The site should retain 3.7ha of land to the South that are in current use for playing fields by a local sports club, with the remaining 4.9ha available for residential led development with some supporting retail uses. To conclude, the site would result in the redevelopment of a sustainable site.

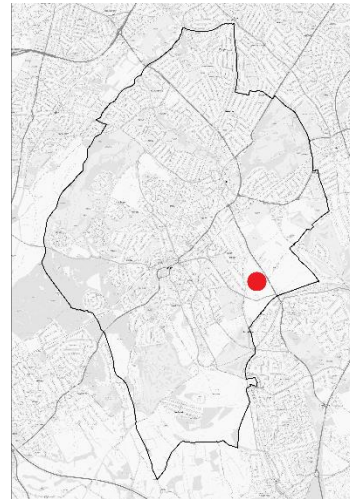
Offsite infrastructure improvements would be required to improve walking and cycling along the Cheam Road corridor and at the A24 junction, with a focus on reducing severance, improving crossing opportunities, and enhancing overall safety and attractiveness for active modes.

On balance, the site should be considered for potential allocation.

**Site location boundary:**



**Site location in Borough:**



**Satellite View:**



**Ward:** Nonsuch

**Site area:** 27.94 ha

**Source of site:** LAA 2022/24 (Call for Sites)

**Site description:** The site comprises a large triangular parcel bounded by College Road to the south. The existing uses include paddocks, pasture, farmland with some light industrial use and small business units within a small collection of buildings located at the centre of the parcel.

The site is wrapped/contained by existing residential development, typically 2 storey detached properties to the NE and West. The main access to the site is midway down the parcel along Reigate Road which is the access road to the existing industrial/commercial uses. There are some commercial/light industrial/waste management facilities known as 'The Chalk Pit' located beyond the site boundary (but adjoining the south west of the site) which are accessed from College Road. The parcel possesses north facing slopes, views are possible across the site. Thick vegetation along the undeveloped site boundaries help to screen views of the elevated site from the surrounding roads. As you move south, away from the more urbanised centre, Reigate Road changes into a more rural/edge of settlement character. There is only a single pedestrian pavement along the length of College Road. The site forms part of the gap of 1.14km between the Epsom and residential areas of Nork, adjacent to the Epsom Downs Station.

The site promoters ([Regulation 19 REP098 Dandara](#)) have submitted supporting information including an analysis of the site and a conceptual masterplan which recommends a public open space to the southern part of the northern parcel to retain a gap between Epsom and Nork. They are also proposing the retention of land in the Green Belt to the south of the site (on the opposite side of College Road) to retain a visual and physical separation with enhanced 'green links' providing pedestrian and cycling movement in the area.

**Existing land use:** Paddocks/pasture/farmland, light industrial

**Type of Landowner:** Private (1 FH)

**Proposed use:** Residential, employment hub, open space, specialist education provision (subject to need)

**Indicative yield:** 530 units (net)

**Indicative timescale for delivery:** Developable within 6-10 years

**Planning history:** None

**Key constraints:** Green Belt.

### Transport Assessment Accessibility Scores:

Primary Schools	Secondary Schools	GPs	Pharmacies	Town & Secondary Centres	Rail Stations	Green Spaces	Total score	Rank (out of 191 sites)	Rank (out of 26 Green Belt sites)
3.0	1.0	1.0	1.0	1.5	2.0	3.0	12.5	177 / 191	15 / 26

**Scoring methodology:** 0-10mins walk = 3 points; 10-20mins walk = 2 points; 20-30mins walk = 1 point and >30mins walk = 0 points  
 \* Primary schools, Town & Secondary Centres & Green Spaces are weighted at 1.5x; the others are weighted 1x.  
**Source:** [Surrey County Council \(SCC\) Regulation 18 Transport Assessment](#)

**Nearest train station:**

- Epsom Downs 0.8 miles 17 min walk.
- Ewell East station, 1.2 miles, 25 min

**Nearest bus stops and routes:** Along Reigate Road past the railway bridge south 166 (Epsom to Croydon) Mon-Fri Hourly service

### Flood Risk Information:

Vulnerability of proposed development	Flood zone	Surface water flooding by risk as a proportion of site area	Groundwater Flooding risk as a proportion of site area	Sewer and reservoir flooding
More vulnerable (residential)  Less vulnerable (employment)	1	High (1 in 30 Year Extent) – 1.07%  Medium (1 in 100 Year Extent) – 1.61%  Low (1 in 1,000 Year Extent) – 2.85%	4.2% of site >= 50% <75%  95.8% of site is outside of a groundwater flood alert area	2 incidents within predominant postcode  Reservoir – No Risk.

### Heritage Impact:

There are no heritage assets within the site. Part of the site borders the Higher Green / Longdown Lane Conservation Area. In addition, a Grade II listed building and locally listed building border the site. The impact on the Conservation Area and listed buildings would depend on the nature, design, and scale of proposals brought forward at the planning application stage. Further information is contained in the Heritage Impact Assessment for the site.

### Ecology/environmental considerations:

SSSI or SAC	SNCI	Local Nature Reserve	Ancient Woodland	Veteran Trees	Biodiversity Opportunity Area
n/a	n/a	n/a	n/a	n/a	<a href="#">ND04 North Downs / Epsom Downs</a>

**Source:** [Epsom & Ewell](#) and [Surrey County Council](#) mapping information

## Indicative Masterplan (sourced from Regulation 19 representation – REP098)



- 1 Epsom Downs Farm
- 2 Re-provided employment
- 3 New school
- 4 The linear park
- 5 The neighbourhood park
- 6 Green pockets terminating east west pedestrian avenues
- 7 Soft edge to existing residential area
- 8 Open green land with formal and informal play
- 9 Indicative location of mixed-uses
- 10 Pedestrian/cycle link with potential emergency access
- 11 Landscape buffer around Chalk Pits Industrial Estate incorporating noise mitigation measures

### Conclusion:

The site consists of some existing commercial uses at the centre of the site, where the rest of the site is largely undeveloped land wrapped by existing residential to the east and west. There are no significant environmental constraints on the site. The site performs low in terms of accessibility to key services and facilities compared to other Green Belt sites but there is an hourly bus service between Epsom and West Croydon that operates nearby which could be diverted to serve the site. There is also a deficit in specialist education provision (SEND) that could potentially be secured on the site. In terms of other constraints, a consideration is potential amenity issues caused by the adjoining waste management facility to the south of the site. However, the indicative masterplan submitted shows the potential use of extensive vegetated buffers to address this and open green space to the south of the site. To conclude, the site would result in the redevelopment to deliver a significant number of homes and some commercial uses, and the identified constraints are mitigable.

Offsite infrastructure improvements would be required to improve walking and cycling linkages to Epsom Downs Station. On balance, the site should be considered for allocation.

## 4. Conclusion

- 4.1. The Council has undertaken a comprehensive review of the additional sites identified in Examination documents [COUD 20](#) (Urban Sites) and [COUD 021](#) (Green Belt Topic Paper Update) in relation to their potential suitability for allocation through main modifications to the Submitted Epsom and Ewell Local Plan.
- 4.2. The findings of this work identify that the Council considers that there are twelve additional urban sites that are potentially suitable for allocation through the main modifications to boost housing supply. These sites along with their indicative housing capacities and timescales for delivery are detailed in **Table 6** and mapped in **Figure 1**

**Table 6:** List of potential additional urban sites for allocation through main modifications, indicative yield and timescales for delivery

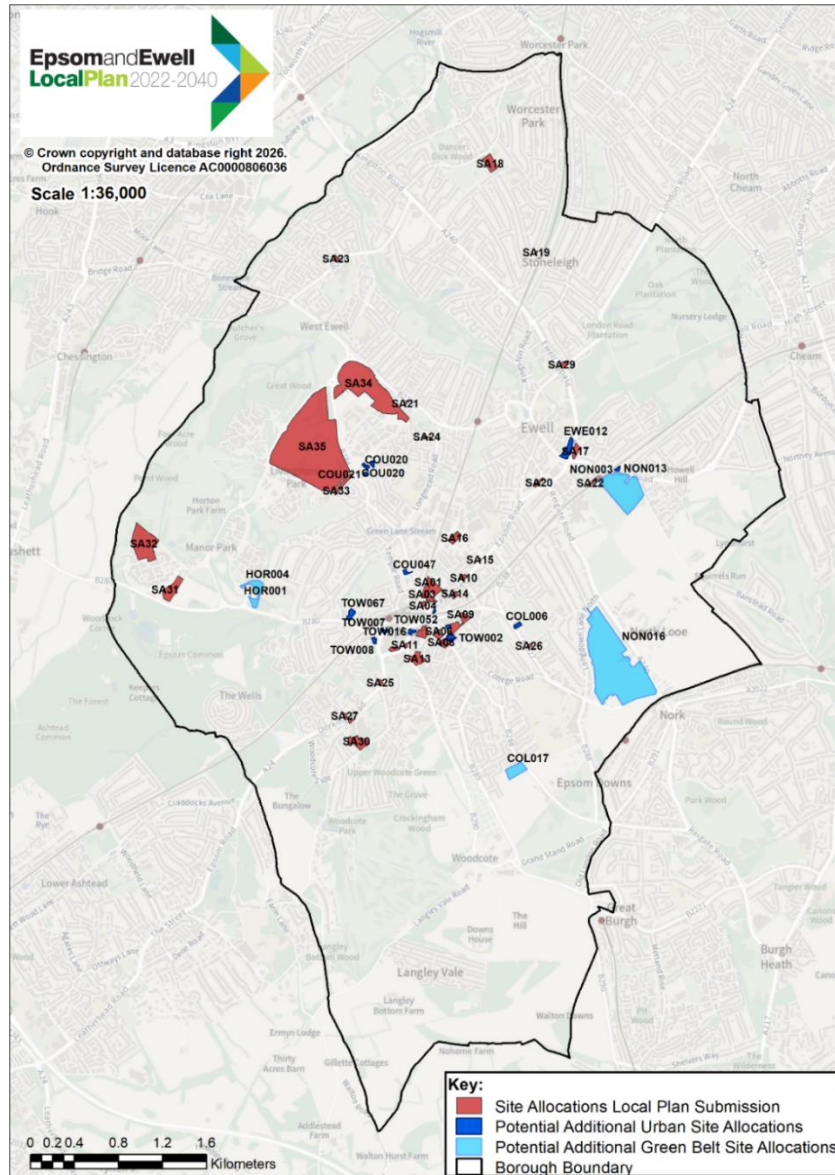
Site name	LAA ref	Indicative yield (minimum capacity)	Indicative timescale for delivery
25 Alexandra Road Epsom Surrey KT17 4BP	COL006	11 C3 units (net)	Developable 11-15 years
Gainsborough Road estate, Epsom	COU020	8 C3 units (net)	Developable within 6-10 years
Parking at 54 Gainsborough Road	COU021	6 C3 units (net)	Developable within 6-10 years
85b Hook Road, Epsom	COU047	8 C3 units (net)	Developable 11-15 years
Land west of Ewell By-Pass	EWE012	38 C3 units (net)	Developable 11-15 years
Conservative Club, Epsom Club and Church	TOW002	28 C3 units (net)	Developable 11-15 years
TK Maxx	TOW007	17 C3 units (net)	Developable 11-15 years
Land R/O The Albion Public House (Mccaffertys Bar)	TOW008	11 C3 units (net)	Developable 11-15 years
Spread Eagle Shopping Centre *	TOW016	22 C3 units (net) or purpose-built student accommodation	Developable 11-15 years
Auction House, Depot Road	TOW041	10 C3 units (net)	Developable 11-15 years
Laine Theatre Arts	TOW052	6 C3 units (net)	Developable within 6-10 years
Eclipse Business Park, West Hill	TOW067	23 C3 units (net)	Developable 11-15 years
<b>Potential additional supply</b>		<b>188 C3 units (net)</b>	

4.3. The findings of this work identify that the Council considers that there are five Green Belt sites that are potentially suitable for allocation through the main modifications to boost housing supply. These sites along with their indicative housing capacities and timescales for delivery are detailed in **Table 7** and mapped in **Figure 1** below:

**Table 7:** List of potential additional Green Belt sites for allocation through main modifications, indicative yield and timescales for delivery

<b>Site name</b>	<b>LAA ref</b>	<b>Indicative yield (minimum capacity)</b>	<b>Indicative timescale for delivery</b>
Land West of Burgh Heath Road	COL017	50 C3 units (net)	Developable within 6-10 years
Cuddington Glade/Land south of Oak Glade	HOR001	70 bed C2 Care home (net)	Deliverable within 5 years
Land off Cuddington Glade	HOR004	50 C3 units (net)	Developable within 6-10 years
Land at Priest Hill	NON013	275 C3 units (net)	Part deliverable within 5 years & within 6-10 years
Downs Farm	NON016	530 C3 units (net)	Developable within 6-10 years
<b>Potential additional supply</b>		<b>905 C3 units (net) 70 C2 units (net)*</b>	

**Figure 1: Maps of Local Plan Submission Site Allocations & Potential Additional Site Allocations**



4.4. A revised trajectory has been prepared in **Figure 2** below to demonstrate the impact that allocating the above potential sites through the Local Plan process in addition to those already contained within the Submitted Epsom and Ewell Local Plan would have upon housing supply over the plan period.

**Figure 2: Revised Trajectory**

SOURCE	No. of units	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	TOTAL
<b>Completions (2022-2024)</b>	<b>568</b>	<b>317</b>	<b>139</b>	<b>112</b>																<b>568</b>
<b>Commitments (April 2024) - 657 with 10% lapse rate applied 591</b>	<b>591</b>				<b>191</b>	<b>200</b>	<b>200</b>													<b>591</b>
Small windfall	420							35	35	35	35	35	35	35	35	35	35	35	35	420
Large windfall	370									37	37	37	37	37	37	37	37	37	37	370
<b>URBAN SITES (20+)</b>																				
SA1 - Southern Gas Network Site	456						225	116	115											456
SA2 - Hook Road Car Park	145								145											145
SA3 - Solis House, 20 Hook Road	20								20											20
SA4 - Bunzl, Hook Road	35				35															35
SA5 - Epsom Town Hall	90						50	40												90
SA6 - Hope Lodge Car Park	35										35									35
SA7 - Former Police and Ambulance Station Site	47						47													47
SA8 - Epsom Clinic	30							30												30
SA9 - Depot Road & Upper High Street Car Parks	100									50	50									100
SA10 - 79-85 East Street	34							34												34
SA11 - Finachem House, 2-4 Ashley Road	38							38												38
SA12 - Global House	75								75											75
SA13 - Swail House	45						45													45
SA14 - 60 East Street	30					30														30
SA16 - Land at Kiln Lane	40													40						40
SA17 - Hatch Furlong Nursery	30								15	15										30
SA18 - Land rear of Rowe Hall	96							96												96
SA22 - Etwelle House, Station Road	20						20													20
<b>SMALL URBAN SITES (5-19)</b>																				
SA15 - Corner of Kiln Lane & East Street (101B East Street)	5							5												5
SA19 - 7 Station Approach, Stoneleigh	8						8													8
SA20 - Esso Express, 26 Reigate Road	10							10												10
SA21 - Richards Field Car Park	7								7											7
SA24 - Garages at Somerset Close & Westmortland Close	6								6											6
SA25 - 64 South Street, Epsom	6							6												6
SA26 - 35 Alexandra Road	8							8												8
SA27 - 22-24 Dorking Road	18							18												18
SA28 - 63 Dorking Road	6							6												6
<b>GREEN BELT RELEASE</b>																				
SA31 - Land at West Park Hospital - South	50							50												50
SA32 - Land at West Park Hospital - North	180								60	60	60									180
SA33 - Land at Chantilly Way	30								15	15										30
SA34 - Hook Road Arena	100									40	40	20								100
SA35 - Horton Farm	1250									50	100	150	150	150	150	150	150	150	50	1250
<b>POTENTIAL ADDITIONAL URBAN SITES</b>																				
COL006 - 25 Alexandra Road Epsom Surrey KT17 4BP	11														11					11
COU020 - Gainsborough Road estate, Epsom	8										8									8
COU021 - Parking at 54 Gainsborough Road	6									6										6
COU047 - 85b Hook Road, Epsom	8															8				8
EWE012 - Land west of Ewell By-Pass	38																		38	38
TOW002 - Conservative Club, Epsom Club and Church	28																28			28
TOW007 - TK Maxx	17																	17		17
TOW008 - Land R/O The Albion Public House (Mccaffertys Bar)	11															11				11
TOW016 - Spread Eagle Shopping Centre	22																			22
TOW041 - Auction House, Depot Road	10																		10	10
TOW052 - Laine Theatre Arts	6											6								6
TOW067 - Eclipse Business Park, West Hill	23														23					23

POTENTIAL ADDITIONAL GREEN BELT SITES																					
COL017 - Land West of Burgh Heath Road	50										50								50		
HOR001 - Cuddington Glade	37						37												37		
HOR004 - Land off Cuddington Glade	50									50									50		
NON013 - Land at Priest Hill	275							75	100	100									275		
NON016 - Downs Farm	530								50	150	150	150	30						530		
Actual / Projection			317	139	112	226	230	595	529	568	508	665	398	372	292	256	241	250	239	192	6129

- 4.5. The trajectory demonstrates that an additional 1,130 homes could be delivered within the plan period, with the delivery of a 70 Bed Care Home (equivalent to 37 C3 dwellings) at Cuddington Glade (HOR001) and 75 dwellings (C3) at Priest Hill (NON013) being potentially delivered within the next 5 years.
- 4.6. If the sites identified above were to be allocated through main modifications to the submitted Local Plan, the supply for the plan period (2022-2040) would increase from [4,960 dwellings](#) (average of 276 dwellings per annum) to 6,129 dwellings (average of 340 dwellings per annum). This will impact the Council's five year land supply position, although the extent of the impact depends on whether the housing requirements set out in the Submission Local Plan is changed. If the requirement remains as in the Submitted Local Plan (261 dwellings per annum), the Council can demonstrate a 6.02 year housing land supply as shown in **Table 8** below:

**Table 8:** 5 Year land supply position if additional potential sites were to be allocated.

Steps	Formula	Workings
<b>Requirement</b>		
A		Submitted Local Plan Period 2022-2040. Housing Need: 261 dwellings per annum, multiplied by 18 years is 4,700 dwellings for the plan period.
B		Annual requirement is 261
C	B x 1.2	2023 HDT result means 20% uplift to requirement. This works out to be 313.2 dwellings per annum
D	C x 5	Housing requirement for the next five years 1 April 2025 - 31 March 2030 is 1,566
<b>Housing Supply</b>		
E		Completions 1 April 2022 to 31 March 2025 is <b>568</b>
F	(3xB)-E	Deficit 1 April 2022 to 31 March 2025 is <b>215</b>
G		Local Plan delivery 2025-2030 is 2147.8
H	(G/F+D) x 5	Five Year Housing Land Supply is (2147.8/1566+215)x5 = <b>6.02</b>
<b>5 yr Housing land supply</b>		<b>6.02 yrs supply</b>

\***Note:** If the housing requirement changes the formula will need to be re-calculated or future calculations would need to be stepped up for later years of the plan period.

## **Appendix A: Heritage Impact Assessments of Potential Additional Local Plan Site Allocations**

The following impact assessments have been carried out in accordance with Historic England Advice Note 3 "[The Historic Environment and Site Allocations in Local Plans](#)". It follows a proportionate approach, for potential allocation purposes, to the step-by-step process outlined on page 5 of that document. The same approach has been undertaken here as was done in the Heritage Topic Paper 2025 (document reference [TP06](#)), where the following sites are those that are potentially suitable for additional allocation through main modifications to the Local Plan.

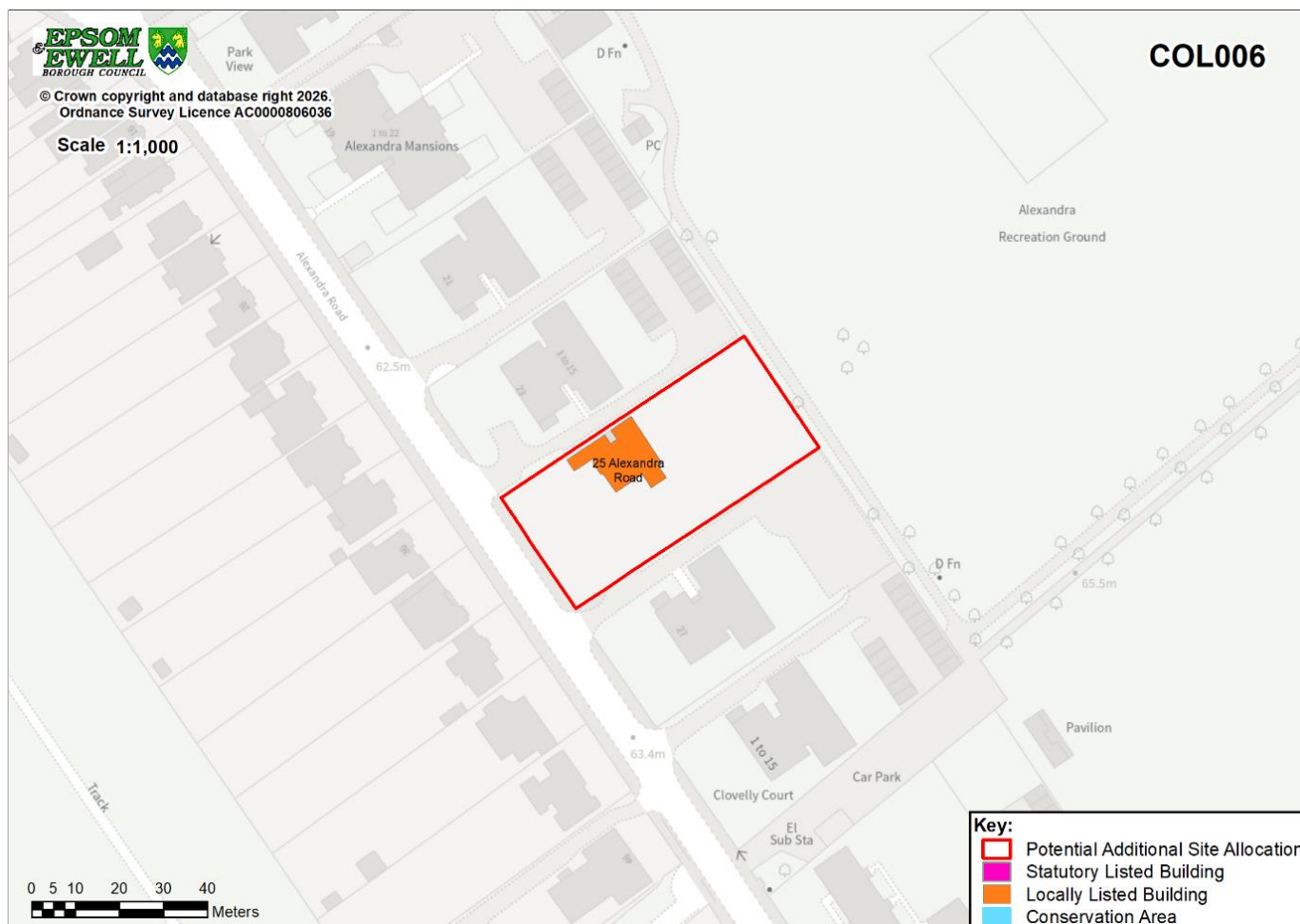
## COL006: 25 Alexandra Road, Epsom

### STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby this group of sites. The following asset has been identified:

#### Locally Listed Building:

- No. 25 Alexandra Road



### STEP 2: Contribution of the site to the significance of the heritage assets

No. 25 Alexandra Road is a Locally Listed Building. It is an early 20th-century red-brick house with a tiled roof, a gable end facing the road, and four chimney stacks. Architectural features include stained-glass windows and front door, plaster mouldings, fireplaces, timber detailing, and an original staircase. It represents a rare surviving example of a late Victorian to Edwardian villa along this section of Alexandra Road (although similar buildings exist elsewhere in the wider area, and these are not listed), and it contributes positively to the area's architectural and historic character.

Its distinctiveness is also of note: the building contrasts with the surrounding development, which on the same side of the road comprises predominantly post-war suburban flats. Including several 1960s blocks, one likely built in the 1970s, an early-2000s example, and a post-2010 scheme. On the opposite side of the road, the immediate townscape is characterised by interwar (1930s) two-storey detached dwellings. None of these nearby buildings are statutorily or non-statutorily listed.

### STEP 3: Impact of potential allocation on significance

The building is locally listed and an allocation could result in a substantial change to the site. However, many comparable late Victorian to Edwardian houses on this side of Alexandra Road appear to have already been

redeveloped into successive phases of postwar and contemporary flat blocks, making this building one of the few remaining examples of its type in the vicinity.

The villa is partly screened by trees when viewed from the public highway, nevertheless the loss of the building would result in a degree of heritage harm. The precise level of harm would depend on the nature, design, and scale of proposals brought forward at the planning application stage. The site has been subject to two outline permissions (lapsed) for the demolition and redevelopment of the site into flats. Part of these permissions stipulated the retention of the stained-glass windows in the new development.

#### **STEP 4: Enhancements**

There is potential for a new development to incorporate design cues that reflect the architectural character of the existing early 20<sup>th</sup> century house. Although Alexandra Road lacks strong uniformity, a sensitive approach to materials, detailing and proportions could help reference the area's historic development. Such an approach may also assist in better revealing the significance of the surviving villa through high quality design and public realm treatment.

The site has been subject to two outline permissions (lapsed) for the demolition and redevelopment of the site into flats. It has also been subject to a permission (lapsed) for repair and conversion of the building into flats which would have resulted result in the preservation of the building and overall less harm.

Given that this section of Alexandra Road has experienced incremental change over several decades, with a predominance of flats from different periods; including 1960s blocks, a 1970s example, an early 2000s scheme, and a post-2010 development that reinterprets mid-century design in a contemporary way; there may be design opportunities to respond to this evolving context. In this regard, it may not always be appropriate or necessary for a new scheme to replicate all the original features of the existing building; instead, a balanced approach could draw from both the early 20<sup>th</sup> century character of the site and the established pattern of later suburban development.

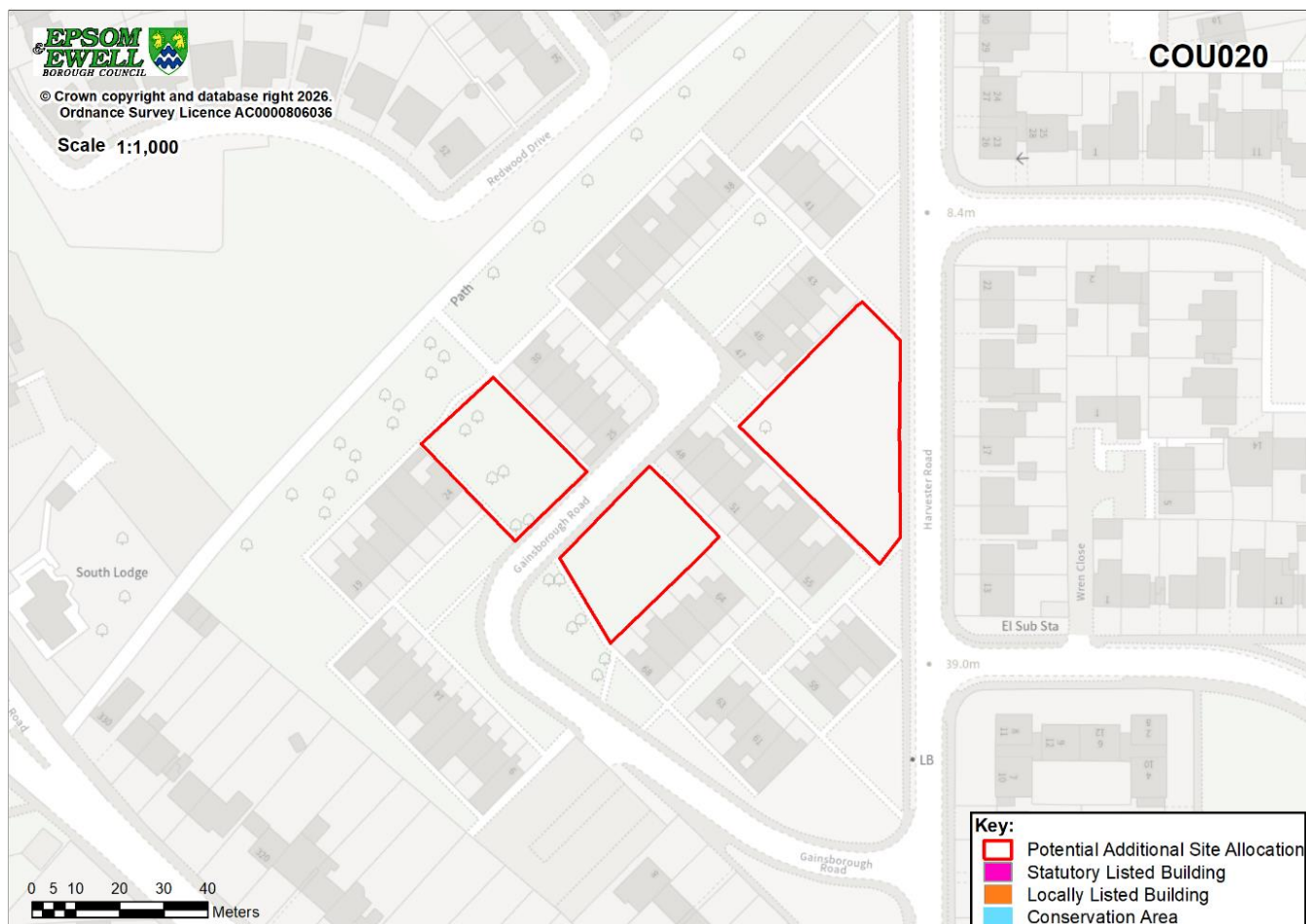
#### **STEP 5: Appropriateness in light of NPPF soundness tests**

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the potential development, the area of the overall site and the public benefit arising from development, there is no evidence to suggest that the principle of allocating the site would be unsound.

## COU020: Gainsborough Road estate, Epsom

### STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. No nearby assets have been identified.



### STEP 2: Contribution of the site to the significance of the heritage assets

As no heritage assets have been identified, the sites contribution is considered minimal.

### STEP 3: Impact of potential allocation on significance

As no heritage assets have been identified, the impact of allocation is considered minimal.

### STEP 4: Enhancements

As no heritage assets have been identified, there are no known opportunities for enhancement of heritage assets.

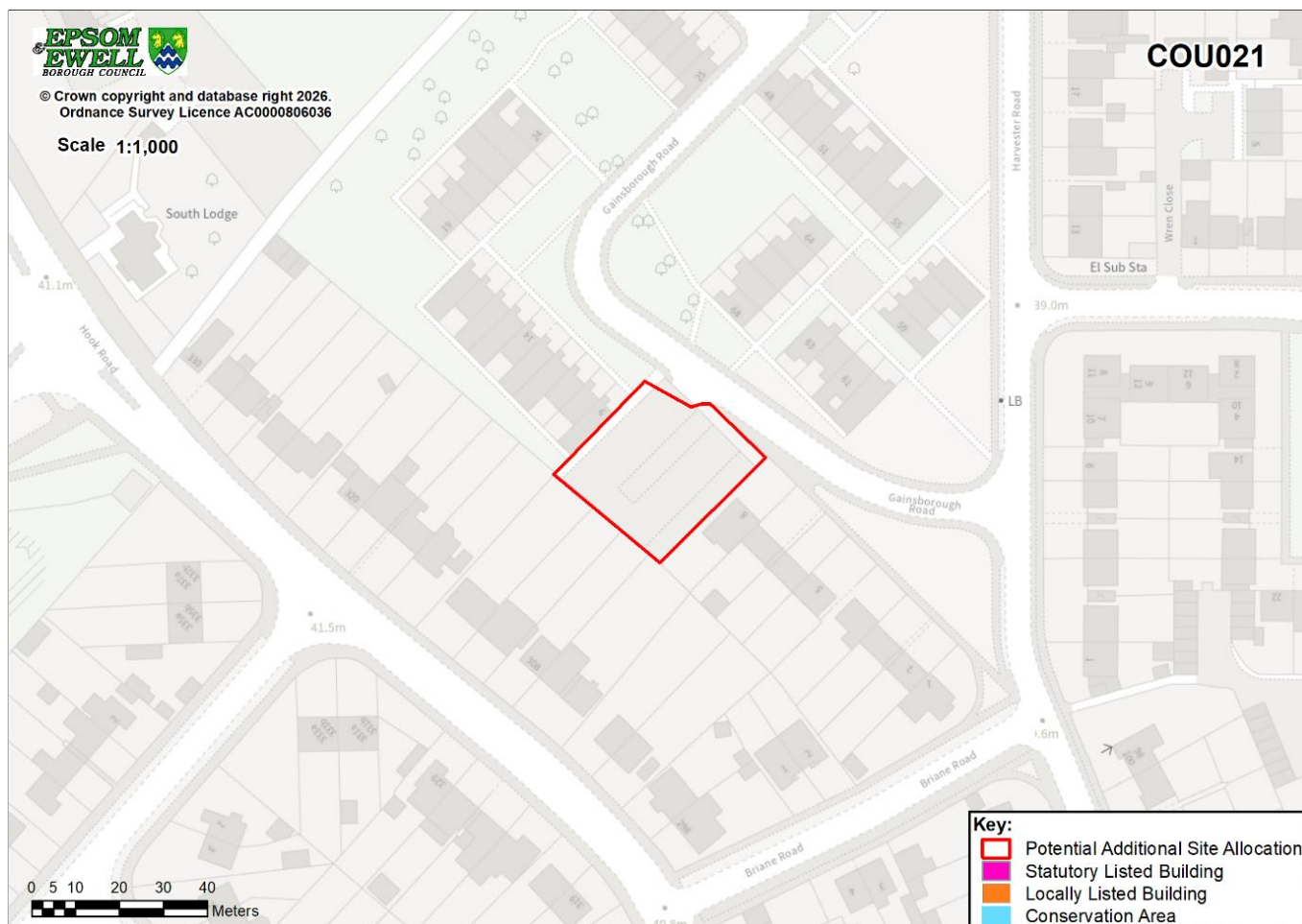
### STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the potential development, the area of the overall site and the public benefit arising from development, there is no evidence to suggest that the principle of allocating the site would be unsound.

## COU021: Parking at 54 Gainsborough Road

### **STEP 1: Identification of heritage assets**

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. None have been identified.



### **STEP 2: Contribution of the site to the significance of the heritage assets**

As no heritage assets have been identified, the sites contribution is considered minimal.

### **STEP 3: Impact of potential allocation on significance**

As no heritage assets have been identified, the impact of allocation is considered minimal.

### **STEP 4: Enhancements**

As no heritage assets have been identified, there are no known opportunities for enhancement of heritage assets.

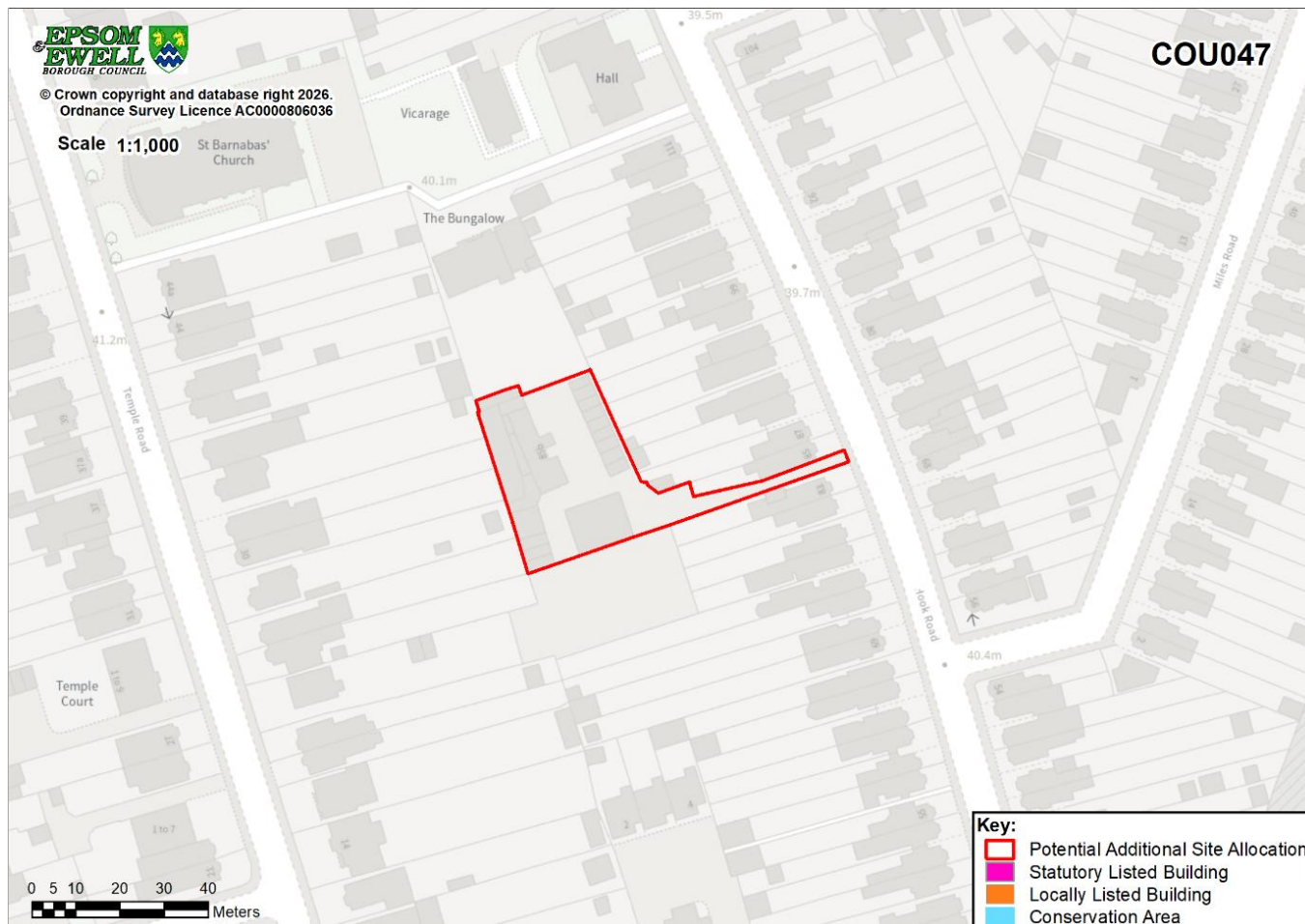
### **STEP 5: Appropriateness in light of NPPF soundness tests**

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the potential development, the area of the overall site and the public benefit arising from development, there is no evidence to suggest that the principle of allocating the site would be unsound.

## COU047: 85b Hook Road, Epsom

### STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. None have been identified.



### STEP 2: Contribution of the site to the significance of the heritage assets

As no heritage assets have been identified, the sites contribution is considered minimal.

### STEP 3: Impact of potential allocation on significance

As no heritage assets have been identified, the impact of allocation is considered minimal.

### STEP 4: Enhancements

As no heritage assets have been identified, there are no known opportunities for enhancement of heritage assets.

### STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the potential development, the area of the overall site and the public benefit arising from development, there is no evidence to suggest that the principle of allocating the site would be unsound.

## EWE012: Land west of Ewell By-Pass

### STEP 1 – Identification of Heritage Assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

#### Conservation areas:

- Ewell Village Conservation Area

#### Statutory listed buildings:

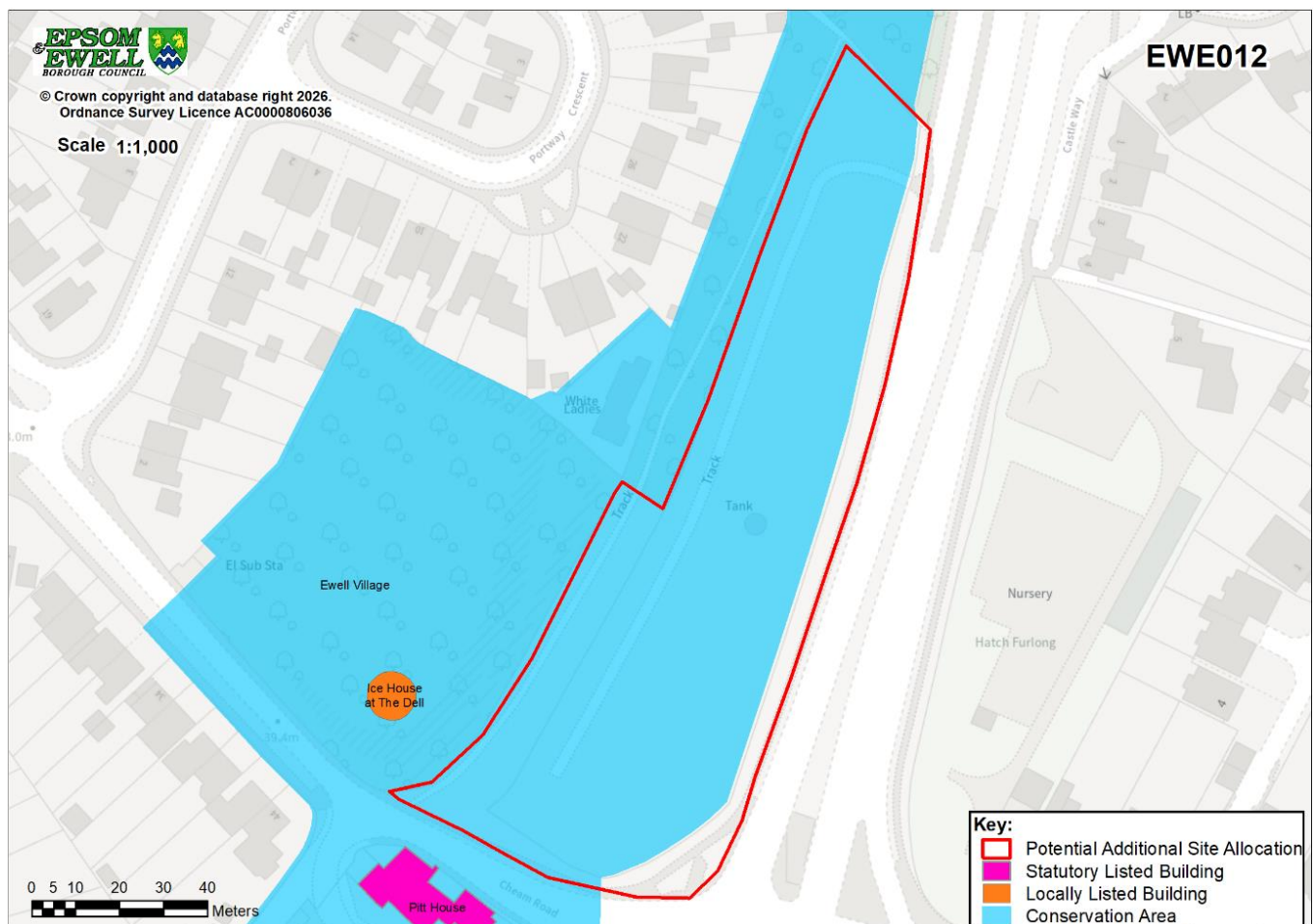
- Grade II Listed Building:
  - Pitt House

#### Locally listed buildings:

- Ice House at The Dell

#### Other heritage assets

- Ewell Roman Historic Core - Area of High Archaeological Potential



## **STEP 2: Contribution of the site to the significance of the heritage assets**

The site sits within the eastern corner Ewell Village Conservation Area adjacent to the busy Ewell Bypass. The site is an open area of undeveloped land, with a heavily vegetated boundary with a public footpath running north/south. The contribution the site makes is to the setting of the conservation area, statutory listed building and locally listed building in the vicinity.

A statutory listed building is located south of site on the opposite side of the road. Pit House is Grade II mid-18th century listed building.

An 18<sup>th</sup> Century locally listed building 'Ice House' is located outside the boundary to the west, but is hidden from view.

## **STEP 3: Impact of potential allocation on significance**

The redevelopment of the site would remove an area of undeveloped land within a conservation area which provides the backdrop to adjacent locally listed and listed buildings. The precise level of harm would depend on the nature, design, and scale of proposals brought forward at the planning application stage.

## **STEP 4: Enhancements**

Potential enhancements may be to incorporate design characteristics of the conservation area and to maintain and/or enhance the vegetation that forms much of the character of this part of the conservation area.

## **STEP 5: Appropriateness in light of NPPF soundness tests**

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the potential development, the area of the overall site and the public benefit arising from development, there is no evidence to suggest that the principle of allocating the site would be unsound.

# TOW002: Conservative Club, Epsom Club and Church

## STEP 1 – Identification of Heritage Assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

### Conservation areas:

- Church Street Conservation Area (adjoining site)

### Statutory listed buildings:

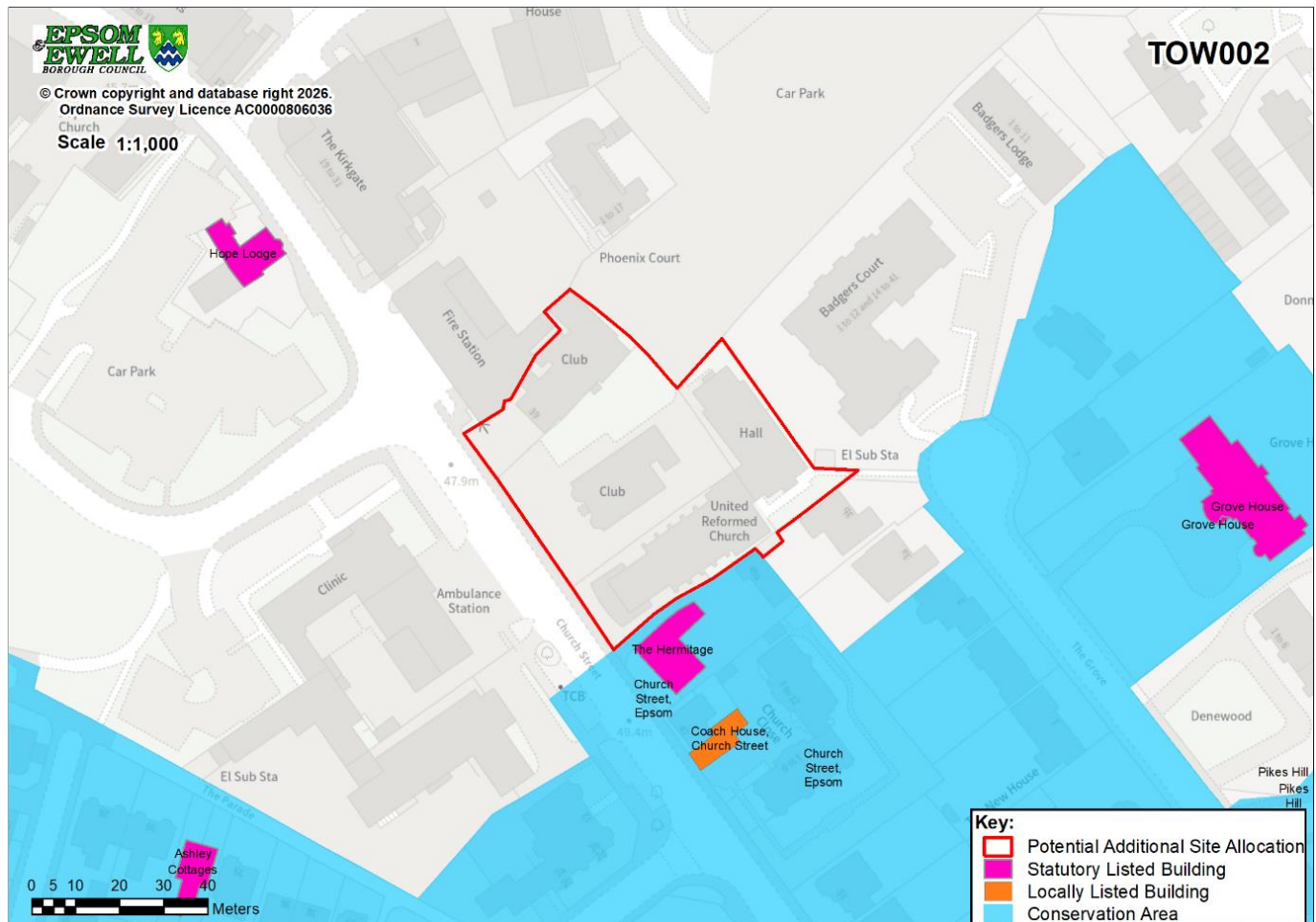
- Grade II Listed Buildings:
  - The Hermitage
  - Grove House
  - Hope Lodge

### Locally listed buildings:

- Coach House and brick wall

### Other heritage assets

- Epsom Historic Town Core - Area of High Archaeological Potential



## **STEP 2: Contribution of the site to the significance of the heritage assets**

Each of the heritage assets located beyond the site boundary are significant in their own right, as described in their respective Conservation Area Appraisal or list description. However, the site itself lacks an obvious connection to these characteristics.

The 2-storey 17<sup>th</sup>-18<sup>th</sup> Century Grade II Listed Building ('The Hermitage') is located adjacent to the site, to the south-east. This is significant in its own right but the site, notably the United Reformed Church, here is not considered to have a 'deep connection'/relevance to the Grade II Listed Building.

There is a lack of uniformity in architectural styles in this section of Church Street.

The other statutory listed buildings are also significant in their own right but there is no obvious connection of the site to the characteristics as detailed in the Conservation Area Appraisal or List description.

## **STEP 3: Impact of potential allocation on significance**

The impact on the Grade II Listed Building ('The Hermitage') would depend on the quantum and scale of the adjacent site allocation.

The impact on the setting of the adjacent Church Street Conservation Area, and other listed buildings would likewise depend on the quantum and scale of development.

## **STEP 4: Enhancements**

There is opportunity to enhance the setting of the Grade II Listed Building ('The Hermitage'). Development of the site brings with it other opportunities for enhancement. Improving legibility between the site, listed buildings and conservation area beyond the site boundary could also be an opportunity.

There is opportunity for enhancements to the public realm.

The site is adjacent to another proposed allocation at Depot Road and Upper High Street Car Park, which offers an opportunity for enhancement.

## **STEP 5: Appropriateness in light of NPPF soundness tests**

The principle of allocation on these sites is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the potential development, the area of the overall site and the public benefit arising from development, there is no evidence to suggest that the principle of allocating the site would be unsound.

# TOW007: TKMaxx

## STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

### Conservation areas:

- Epsom Town Centre Conservation Area

### Statutory listed buildings:

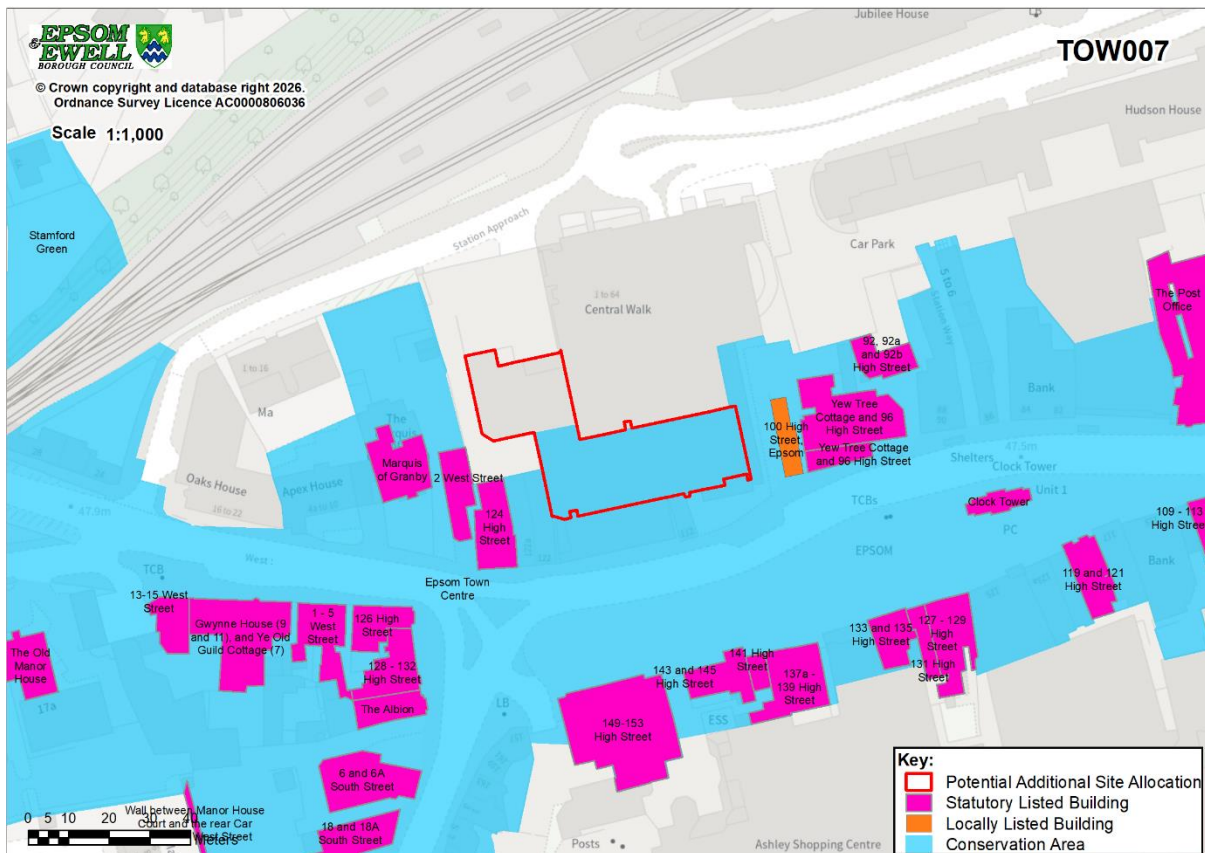
- Yew Cottage and 96 High Street (Grade II)
- 124 High Street (Grade II)
- 2 West Street (Grade II)
- Marquis of Gransby, 4 West Street (Grade II)
- The Assembly Rooms, Weatherspoons, 147-153 High Street (Grade II\*)
- 143-145 High Street (Grade II)
- 141 High Street (Grade II)
- 137a-139 High Street (Grade II)

### Locally listed buildings:

- 100 High Street

### Other heritage assets

- Epsom Historic Town Core - Area of High Archaeological Potential



## STEP 2: Contribution of the site to the significance of the heritage assets

The site is located within Epsom Town Centre conservation area, along a key retail frontage, opposite the main market square. The site itself is not of any historical significance however it is surrounded by many statutory listed buildings. The frontage of the building sits within the conservation area. The conservation area is the core

of the Town Centre and the collection of heritage assets it is recognised that the surrounding buildings are concentrated in this area.

The building itself is a 2-3 storey retail building with mansard roof. This utilitarian design contributes little to the surrounding heritage assets and conservation area.

### **STEP 3: Impact of potential allocation on significance**

The redevelopment of the site offers opportunity to replace the existing building with a better designed one in the future. There is opportunity to improve the character and appearance of the site, as well as significance and setting of the conservation area and nearby heritage assets.

Careful consideration with regard to style and scale of the building should be considered in the context of the surrounding buildings.

### **STEP 4: Enhancements**

Redevelopment brings with it opportunities for enhancement of the streetscape along the High Street which could enhance the setting & significance of the Epsom Town Centre conservation area. There may be opportunities to better reflect some of the architectural details in the area (e.g. the Assembly Rooms across the street).

### **STEP 5: Appropriateness in light of NPPF soundness tests**

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the potential development, the area of the overall site and the public benefit arising from development, there is no evidence to suggest that the principle of allocating the site would be unsound.

# TOW008: Land R/O The Albion Public House (Mccaffertys Bar)

## STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

### Conservation area:

- Epsom Town Centre

### Statutory listed buildings:

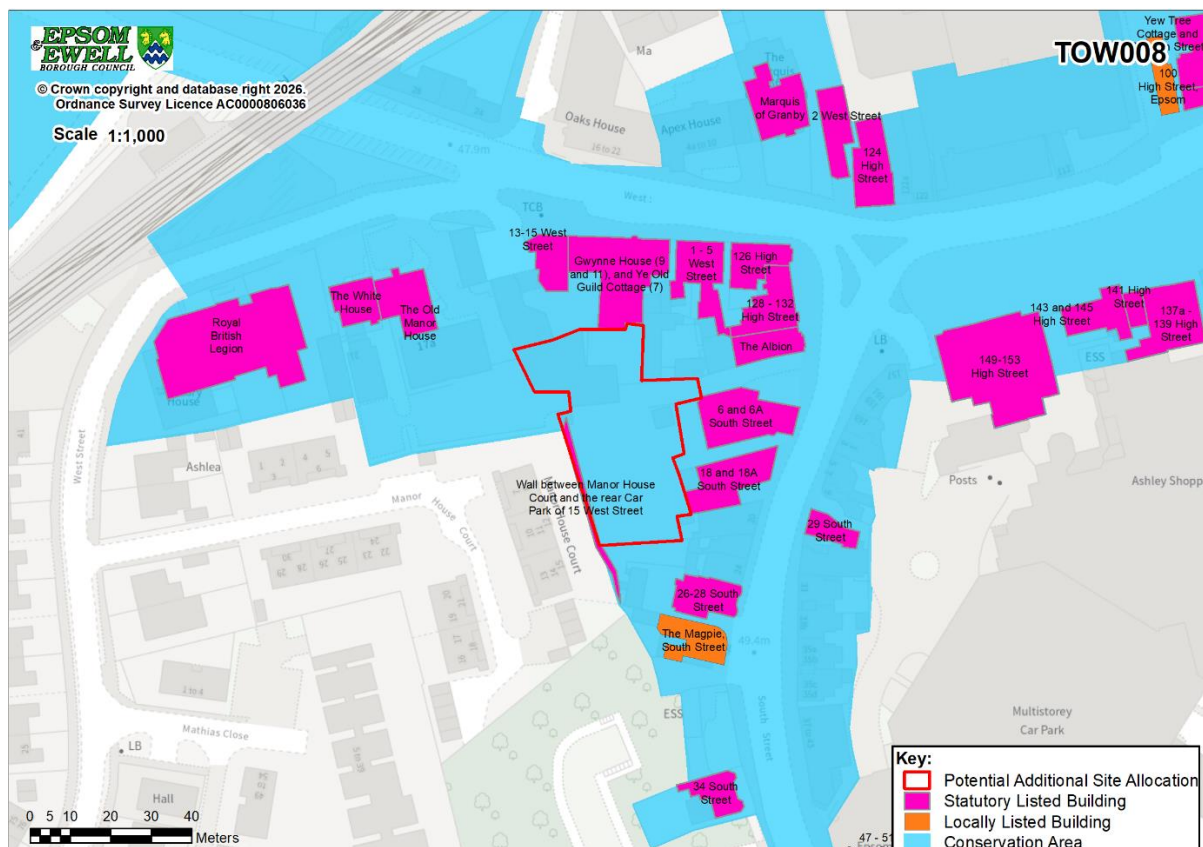
- Grade II Listed Buildings:
  - Wall between Manor House Court and the rear of Car Park of 15 West Street
  - 13-15 West Street
  - Gwynne House (9 and 11), and Ye Old Guild Cottage (7)
  - 1-5 West Street
  - 126 High Street
  - 128-132 High Street
  - The Albion
  - 6 and 6A South Street
  - 18 and 18A South Street
  - 29 South Street
  - The Old Manor House
  - The White House

### Locally listed buildings:

- No. 30 Symonds Well

### Other heritage assets

- Epsom Historic Town Core - Area of High Archaeological Potential



## **STEP 2: Contribution of the site to the significance of the heritage assets**

Each of these heritage assets is significant in their own right, as described in their respective Conservation Area Appraisal or list description.

The site is surrounded by a number of Grade II listed buildings, one of which is located within the site boundary, on the west (the others are either abutting – 3 of them – or nearby). The heritage asset within the site boundary is the Grade II listed wall – comprises of stone & red brick in English garden wall bond.

The site sits to the rear of the adjacent Listed Buildings and makes little contribution to the setting or significance of nearby listed buildings.

## **STEP 3: Impact of potential allocation on significance**

Development of the site would have an impact on the character of the surrounding area; however, the existing site makes little contribution to the nearby heritage assets given its position and relationship with the surrounding buildings. The Grade II Listed Wall, however, which is on the western site boundary should be protected and any future development should not harm the significance of this heritage asset.

## **STEP 4: Enhancements**

There is limited opportunity for enhancements to the Grade II listed wall on the western boundary treatment. Development, as stated above, should however be carefully considered so as to not negatively impact on this heritage asset. Opportunities for enhancing the setting(s) of the nearby heritage assets should be taken, where possible.

## **STEP 5: Appropriateness in light of NPPF soundness tests**

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the potential development, the area of the overall site and the public benefit arising from development, there is no evidence to suggest that the principle of allocating the site would be unsound.

# TOW016: Spread Eagle Shopping Centre

## STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

### Conservation areas:

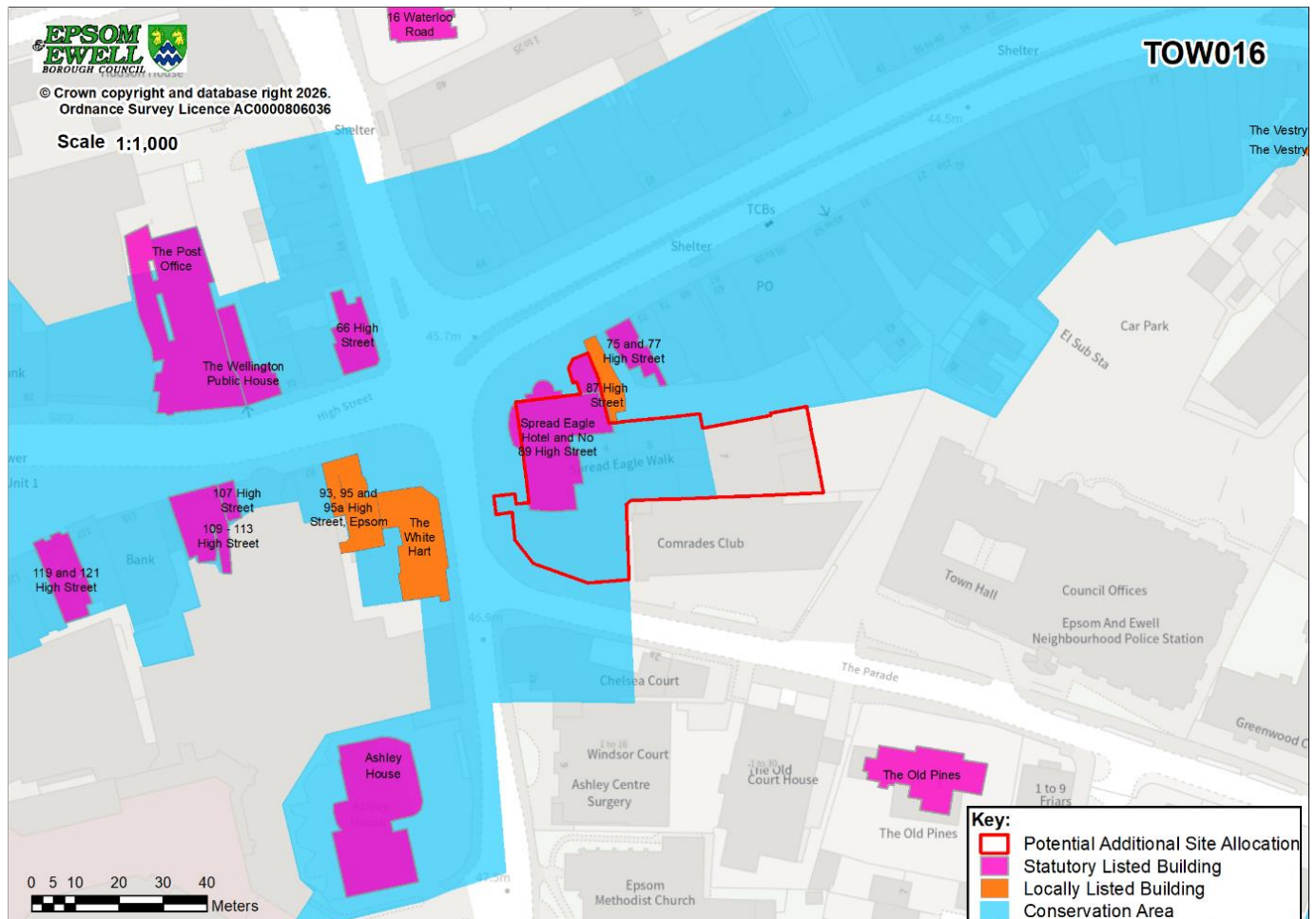
- Epsom Town Conservation Area

### Statutory listed buildings:

- Grade II Listed Buildings:
  - The Spread Eagle Hotel and No. 89
  - 75 and 77 High Street
- Locally listed buildings:
  - No. 87 High Street
  - Nos. 91 and 91a High Street

### Other heritage assets

- Epsom Historic Town Core - Area of High Archaeological Potential



## **STEP 2: Contribution of the site to the significance of the heritage assets**

The site is a collection of commercial buildings making up a small, covered shopping area located at a prominent junction within the Town Centre. This junction and most of the Town Centre frontage is within the Epsom Town Centre conservation area.

Part of the site frontage is Grade II listed. The front elevation of the site facing the junction of High Street and Ashley Road are Grade II listed buildings including Spread Eagle Hotel and No. 89. It is late C17 with later stucco finish, two storeys basement and attic, sash windows, parapet. With a central doorway approached by steps; hanging canopy on iron suspenders with dentilled cornice; fluted pilasters.

The adjoining buildings are a mixture of locally listed buildings and listed buildings. Whilst the most notable heritage asset is the Grade II Listed "Spread Eagle Hotel & No. 89", there are other listed buildings – Nos 75 & 77 and 87 nearby (No 87 is a locally listed building).

To the rear of the site the buildings appear to be modern extensions where the conservation area cuts through, therefore the rear buildings sit outside of the conservation area. The contribution of the rear of the site to the significance of the nearby heritage assets are limited.

## **STEP 3: Impact of potential allocation on significance**

The listed building ('Spread Eagle Hotel and No. 89') and associated fixtures/fittings/street furniture located within the site should be retained and protected. Conversion or redevelopment should be focussed to the rear where the adjoining buildings contribute little to the significance of the heritage assets. The rear of the site may be more suited to conversion, or sensitive extension or redevelopment to ensure an appropriate treatment of the heritage asset and it's setting.

## **STEP 4: Enhancements**

The listed building ('Spread Eagle Hotel and No. 89') and associated fixtures/fittings/street furniture located within the site should be retained and protected. Potential enhancements would depend on the development proposed. There may be opportunities to enhance the significance of the rear of the 'Spread Eagle Hotel and No. 89' through redevelopment of this part of the site, and this should be explored. Similarly, there may be opportunities to better reflect the architectural character of the surrounding heritage assets.

## **STEP 5: Appropriateness in light of NPPF soundness tests**

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the potential development, the area of the overall site and the public benefit arising from development, there is no evidence to suggest that the principle of allocating the site would be unsound.

# TOW041: Auction House, Depot Road

## STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

### Conservation areas:

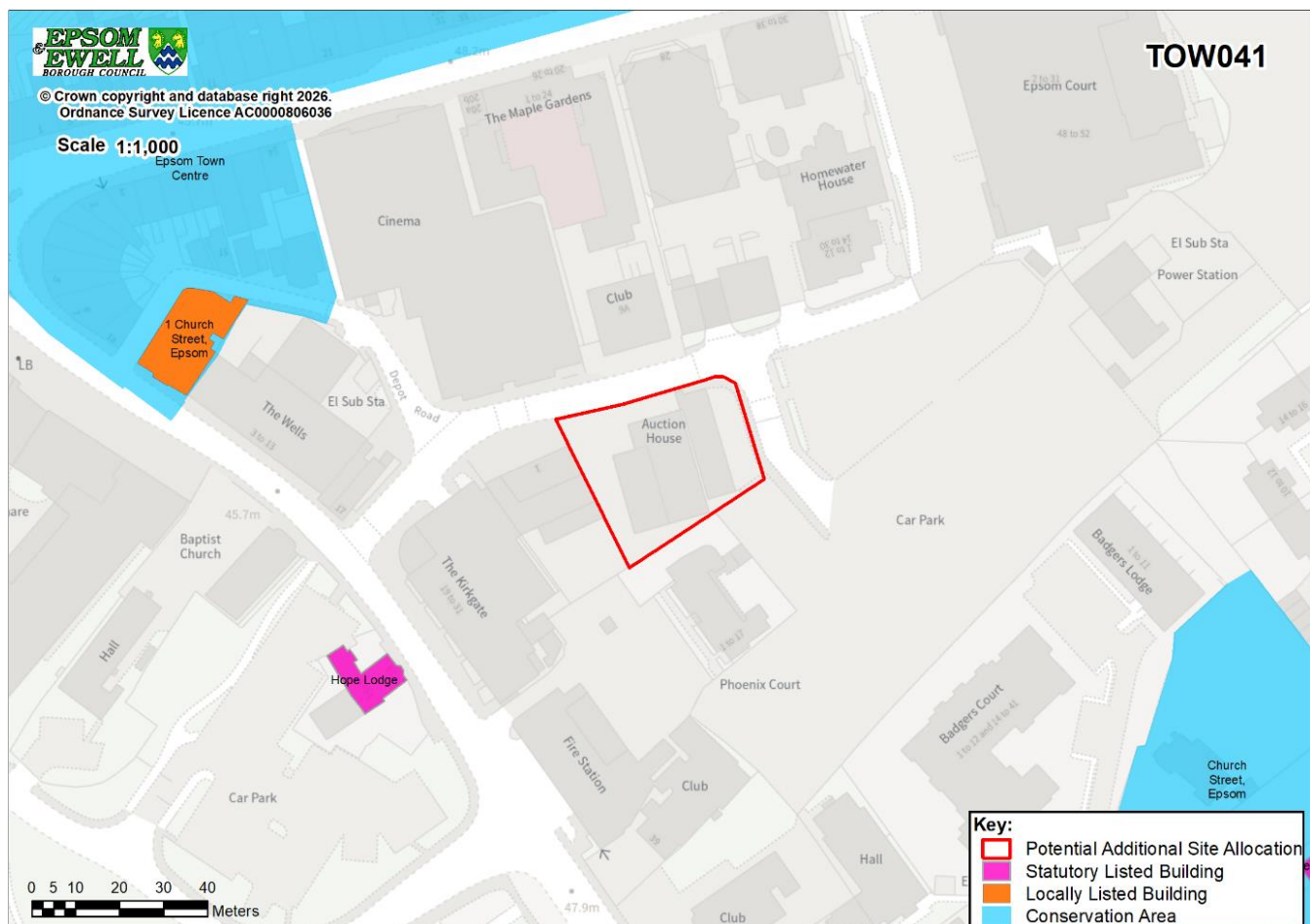
- Epsom Town Centre Conservation Area (north-west of site)
- Church Street Conservation Area (south-east of site)

### Statutory listed buildings:

- Hope Lodge (Grade II)

### Locally listed buildings:

- Epsom Adult and Community Learning, 1 Church Street



## STEP 2: Contribution of the site to the significance of the heritage assets

The site is a small single storey brick building with an asymmetric roof. It functions as a Motor Vehicle garage located at the rear of retail along upper High Street on the eastern edge of Epsom Town Centre. The site sits between but outside the Town Centre Conservation Area and Church Street Conservation Area. At present it forms part of a group of small buildings located adjoining a large surface area car park. The site is over 100 m walking distance from the nearest heritage asset and has little to no impact on heritage assets in the area.

## STEP 3: Impact of potential allocation on significance

The impact of allocation on the locally listed building is considered minimal.

#### **STEP 4: Enhancements**

There are no opportunities for enhancement of heritage assets.

#### **STEP 5: Appropriateness in light of NPPF soundness tests**

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the potential development, the area of the overall site and the public benefit arising from development, there is no evidence to suggest that the principle of allocating the site would be unsound.

## TOW052: Laine Theatre Arts

### STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

#### Conservation areas:

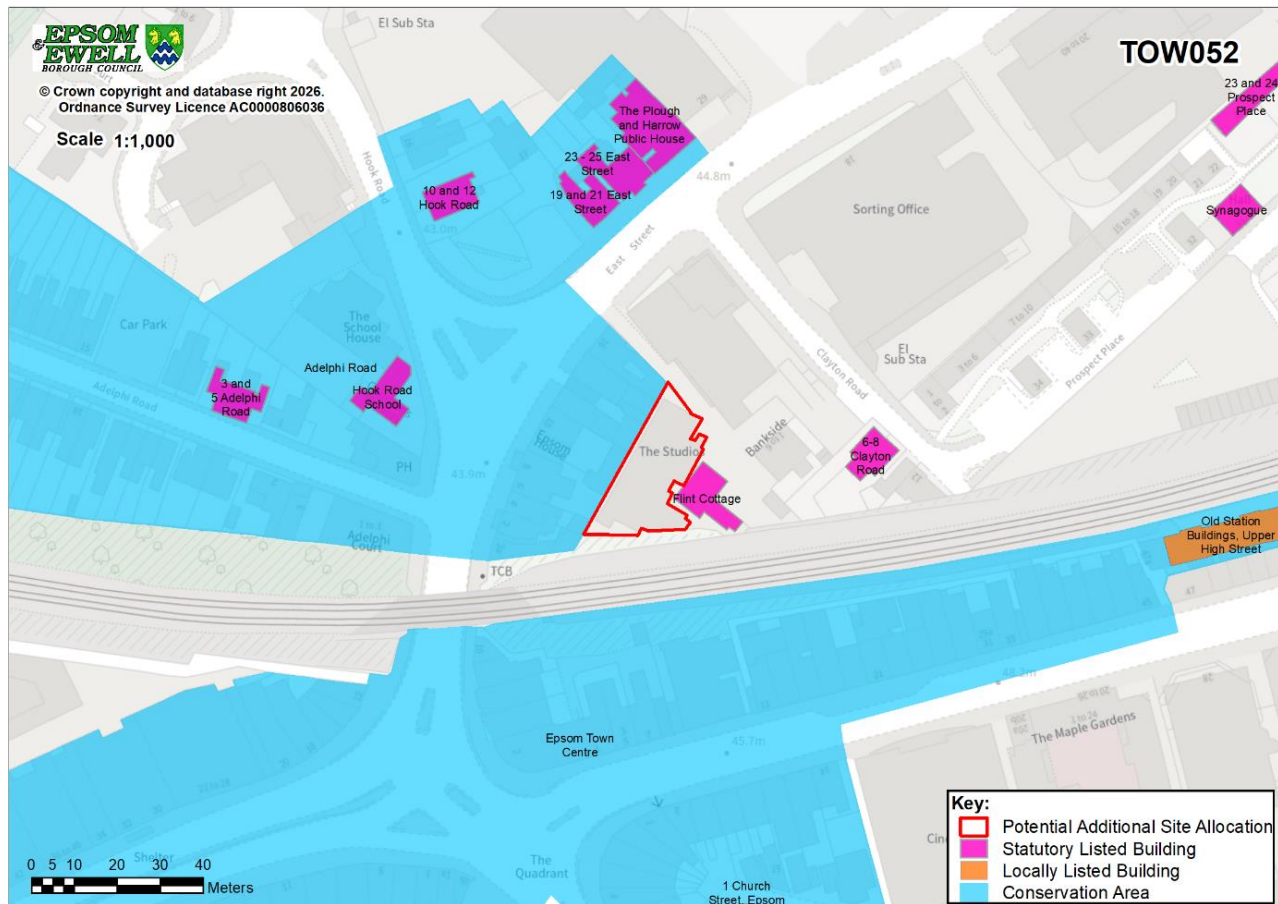
- Adelphi Road Conservation Area (adjoining site)

#### Statutory listed buildings:

- Flint Cottage, Grade II (adjoining site)

#### Other heritage assets

- Epsom Historic Town Core - Area of High Archaeological Potential



### STEP 2: Contribution of the site to the significance of the heritage assets

The site is a two/three storey brick building located behind the retail and office frontage along East Street on the edge of the Town centre. It is an independent educational establishment for performing arts. The site is accessed along a narrow alleyway which provides pedestrian and vehicle access. The building is adjacent to a two storey Grade II listed building with detailing brickwork on the window. The building itself has no historical significance but has an existing dominating impact on the adjacent heritage asset.

### STEP 3: Impact of potential allocation on significance

Comprehensive redevelopment of the site would have an impact on the setting of the adjacent heritage asset. The heritage asset may benefit from conversion, retaining the external appearance of the building, minimising any additional negative impact on the listed building.

#### **STEP 4: Enhancements**

The building may benefit from conversion rather than redevelopment to limit the impact on the adjacent listed building. Comprehensive redevelopment may provide opportunities for enhancement to the setting of the listed building.

#### **STEP 5: Appropriateness in light of NPPF soundness tests**

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocating the site would be unsound.

# TOW067: Eclipse Business Park, West Hill

## STEP 1: Identification of heritage assets

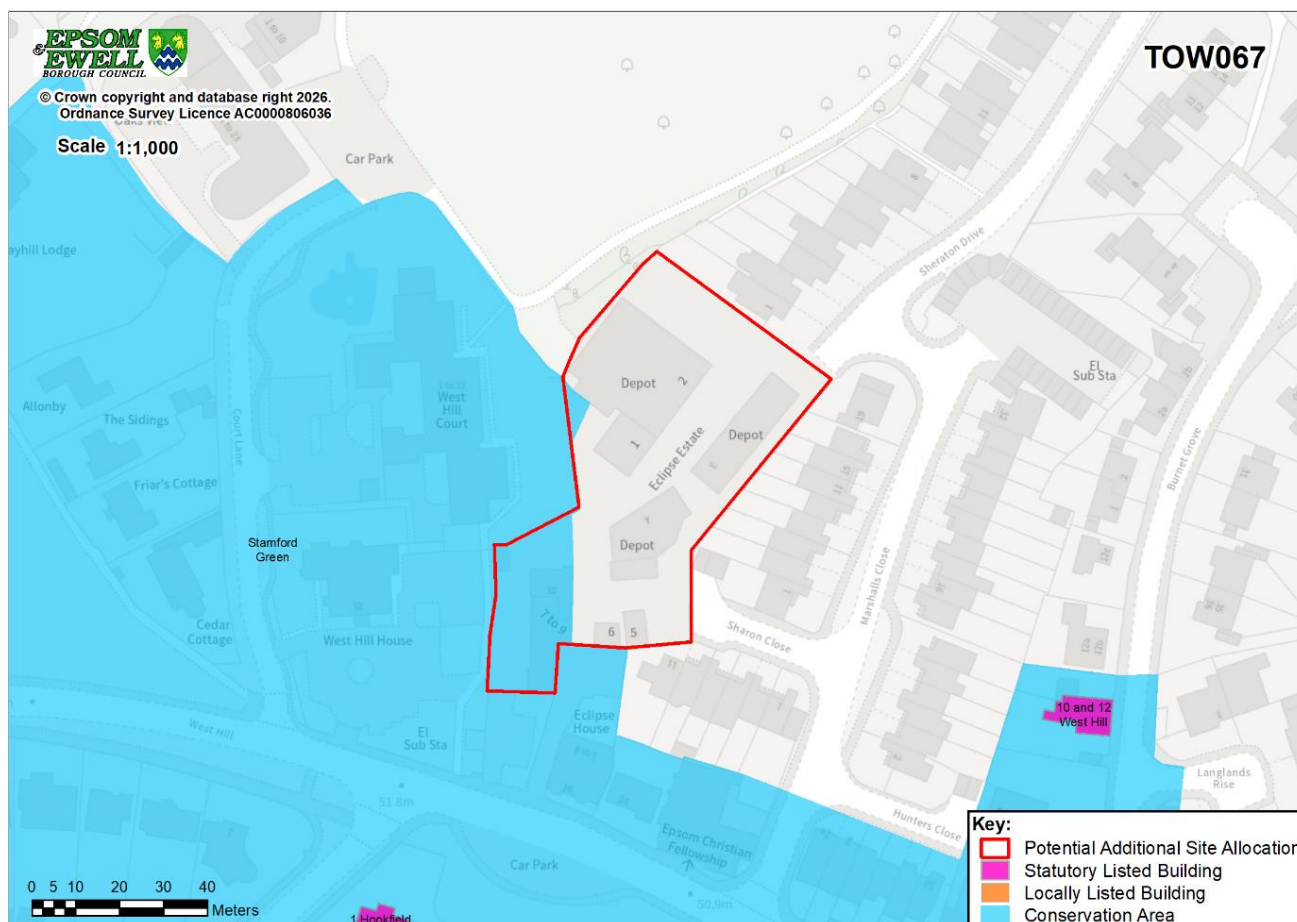
A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

### Conservation areas:

- Stamford Green (part of site only)

### Other heritage assets

- Epsom Historic Town Core - Area of High Archaeological Potential (southern portion of the site)



## STEP 2: Contribution of the site to the significance of the heritage assets

The business park is located to the rear of main frontage of houses and church along West Hill Road. The site contains a mixture of commercial uses and light industrial in buildings of varying sizes. Court recreation ground is located adjacent to the rear (north) of the site. The site makes little contribution to the significance and setting of the conservation area.

## STEP 3: Impact of potential allocation on significance

The site access is from West Hill Road with the built form being mostly being screened by buildings adjoining the site and is therefore to a degree detached from the street scene. The redevelopment of the site allows for opportunities to improve the significance of this part of the conservation area and its' setting.

## STEP 4: Enhancements

Redevelopment of the site offers the opportunity to improve the design and quality of the site, to compliment the surrounding character and improve the setting and significance of the conservation area.

## STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the potential development, the area of the overall site and the public benefit arising from development, there is no evidence to suggest that the principle of allocating the site would be unsound.

## COL017: Land West of Burgh Heath Road

### **STEP 1: Identification of heritage assets**

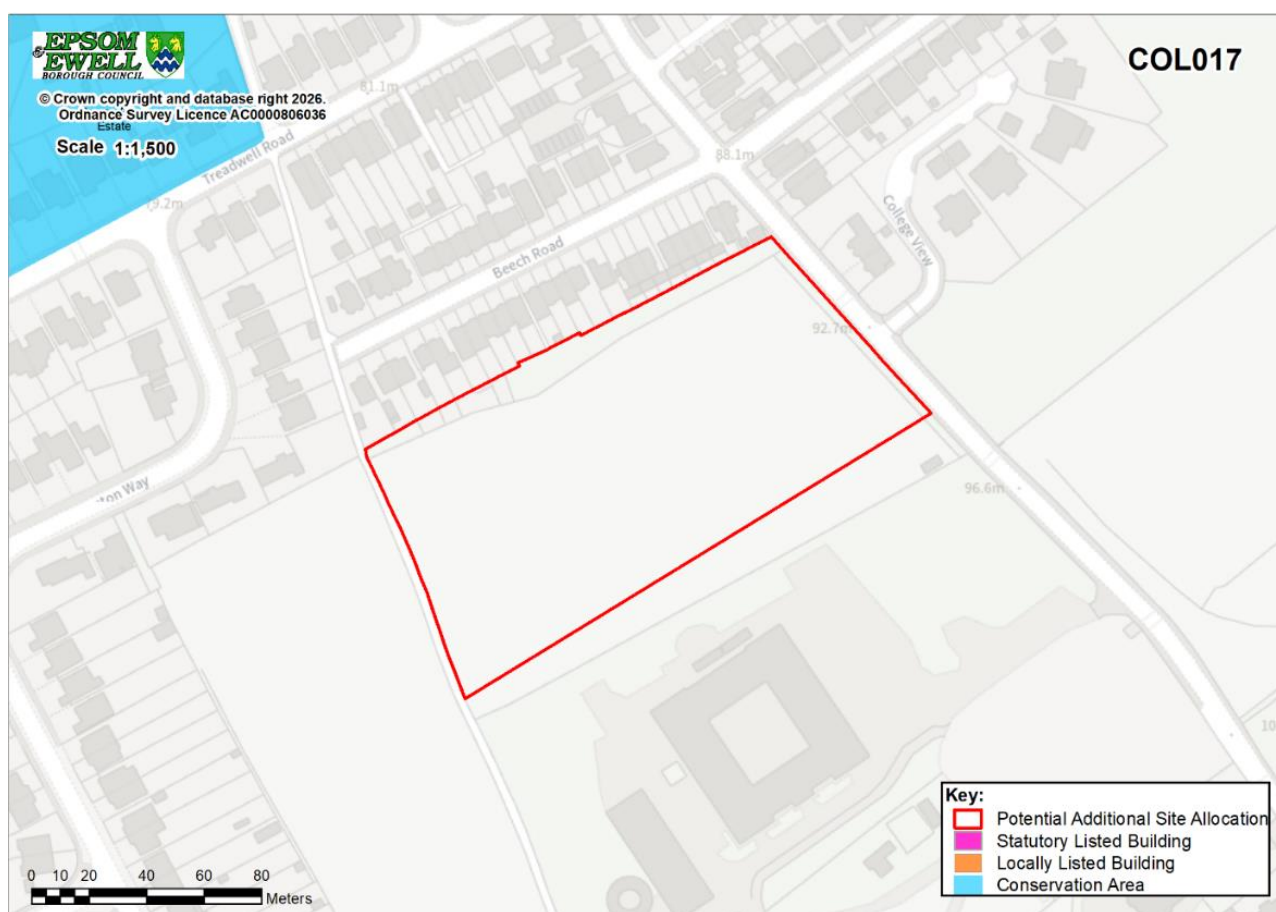
A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

#### Conservation areas:

- Downs Road Estate Conservation Area (to north west of site)

#### Other heritage assets:

- Area of High Archaeological Potential (AHAP) - Bronze Age Auroch findspot, adjacent Burgh Heath Road, Epsom



### **STEP 2: Contribution of the site to the significance of the heritage assets**

The site is a paddock/undeveloped greenfield site. There are no statutory listed buildings heritage assets located in the vicinity and the closest conservation area is located a fair distance away, and as such the site does not contribute to its setting or significance.

### **STEP 3: Impact of potential allocation on significance**

The allocation of the site would have limited impact on the significance or setting of the conservation area.

### **STEP 4: Enhancements**

It is considered that there are limited opportunities for enhancement.

### **STEP 5: Appropriateness in light of NPPF soundness tests**

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage

assets would be dependent on the details of future planning applications on this site. However, taking into consideration the potential development, the area of the overall site and the public benefit arising from development, there is no evidence to suggest that the principle of allocating the site would be unsound.

## **HOR001: Cuddington Glade**

### **STEP 1: Identification of heritage assets**

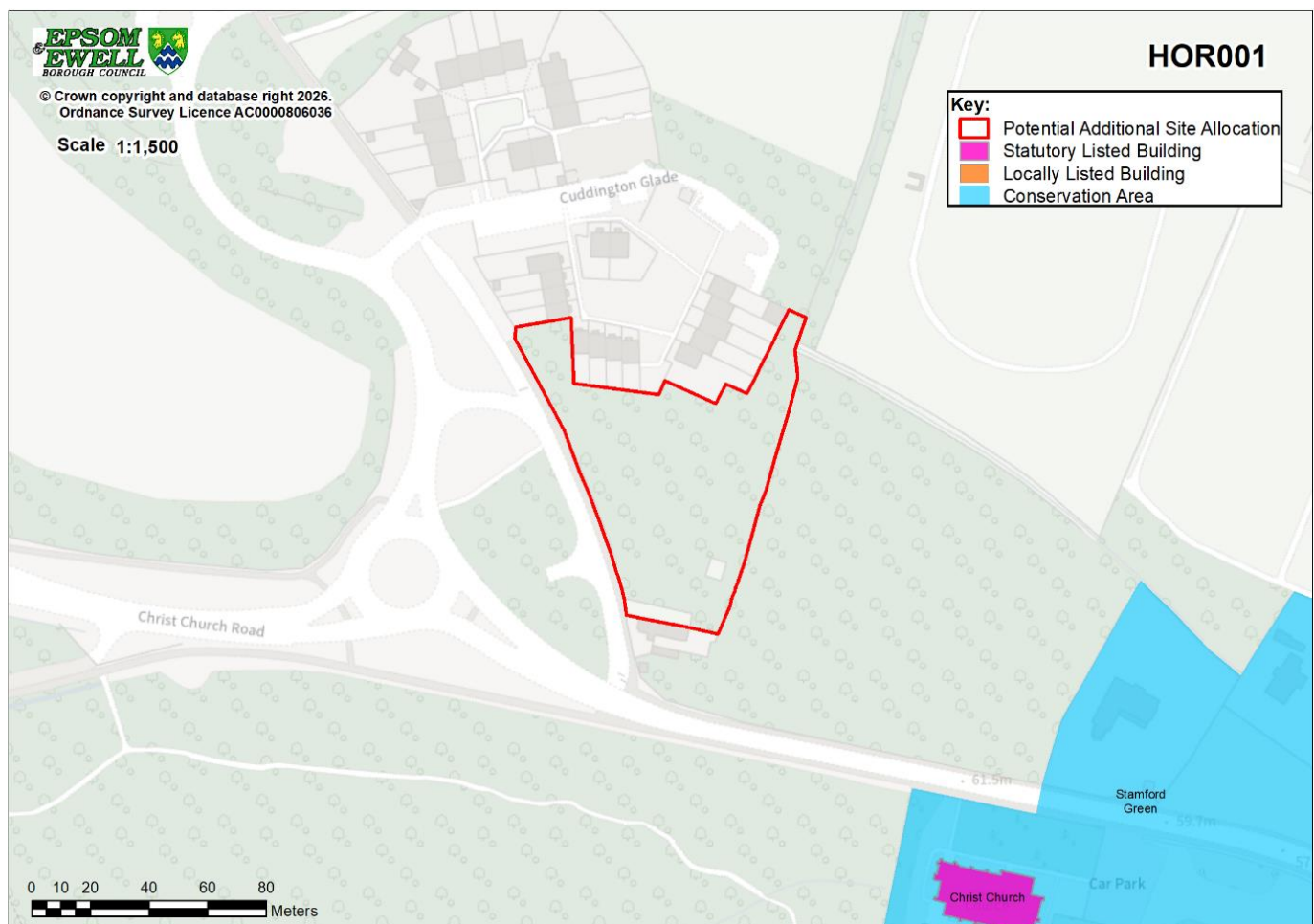
A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

#### Conservation areas:

- Stamford Green Conservation Area (south-east of site)

#### Statutory listed buildings:

- Christ Church, Christ Church Road (Grade II\*)



### **STEP 2: Contribution of the site to the significance of the heritage assets**

The site is an undeveloped greenfield site located to the western edge of the Borough. The site is self-contained and the nearest heritage assets are over 100m away across the opposite side of the road to the south. The site makes no contribution to these heritage assets.

### **STEP 3: Impact of potential allocation on significance**

The allocation of the site would have limited impact on the setting or significance of the nearby heritage assets (conservation area and listed building).

#### **STEP 4: Enhancements**

There is limited opportunity for any enhancements to the nearby heritage assets.

#### **STEP 5: Appropriateness in light of NPPF soundness tests**

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the potential development, the area of the overall site and the public benefit arising from development, there is no evidence to suggest that the principle of allocating the site would be unsound.

## HOR004: Land off Cuddington Glade

### STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

- Manor (Epsom) Conservation Area (north-west of site)



### STEP 2: Contribution of the site to the significance of the heritage assets

The site is an undeveloped greenfield site located to the western edge of the borough. The site is self-contained, with limited views in/out from the public highway. The site is over 100m away from Manor Conservation Area to the north-west and therefore makes no contribution to the heritage asset.

### STEP 3: Impact of potential allocation on significance

Allocation of the site would have no impact on the setting or significance of the conservation area.

### STEP 4: Enhancements

There is limited opportunity for any enhancements to the nearby heritage assets.

### STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the potential development, the area of the overall site and the public benefit arising from development, there is no evidence to suggest that the principle of allocating the site would be unsound.

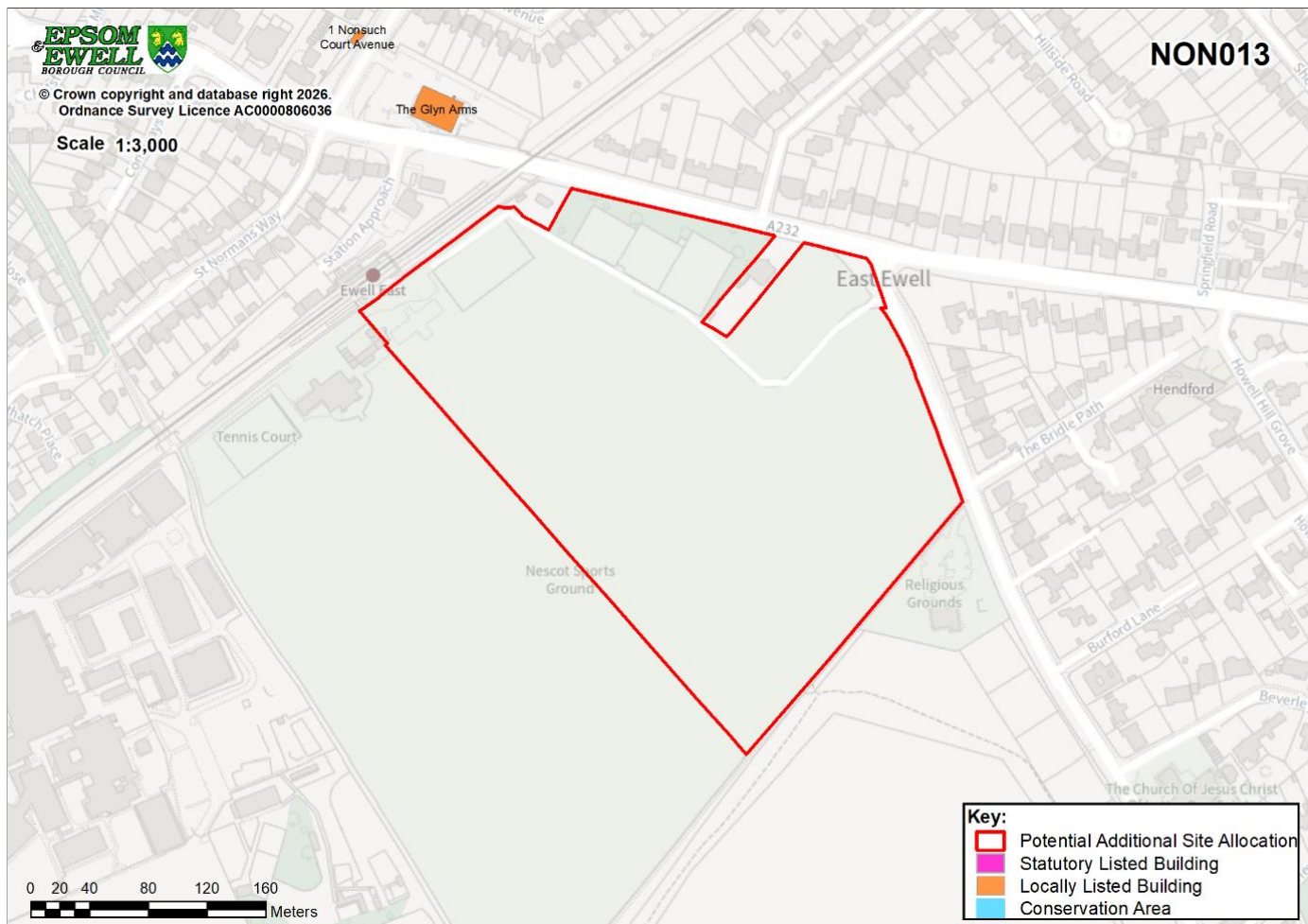
# NON013: Land at Priest Hill

## STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

### Locally listed buildings:

- No.45 The Glyn Arms (north-west of the site)
- No.1 (north-west of the site)



## STEP 2: Contribution of the site to the significance of the heritage assets

The site is undeveloped land within a largely urbanised context comprised of recreational facilities and playing fields, hard surfacing (former tennis courts), derelict buildings on the middle parcel, next to Ewell East Station.

The site borders the railway line, Cheam Road (the A232) and Banstead Road, with public rights of way to the north (parallel to the railway line) west (along the edge of Nescot College) and south of the site where Priest Hill Nature Reserve is located.

No.45 The Glyn Arms & No.1 (both Locally Listed buildings) are set within the wider residential areas surrounding the Land at Priest Hill site. The site (Land at Priest Hill) is not experienced from within No.45 The Glyn Arms and No.1 (situated opposite the road from one another) due to topography and the presence of the railway line having a dominant severing impact on the sense of connection between the site and No.45 The Glyn Arms and No.1.

### **STEP 3: Impact of potential allocation on significance**

Accounting for the existing residential and urban character of the surrounding area from within which No.45 The Glyn Arms & No.1 are set, residential development of the site is considered to have limited to no impact on the significance or setting of the heritage assets.

### **STEP 4: Enhancements**

It is not considered that enhancements to the locally listed buildings are possible or likely.

### **STEP 5: Appropriateness in light of NPPF soundness tests**

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the potential development, the area of the overall site and the public benefit arising from development, there is no evidence to suggest that the principle of allocating the site would be unsound.

# NON016: Downs Farm

## STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

### Conservation areas:

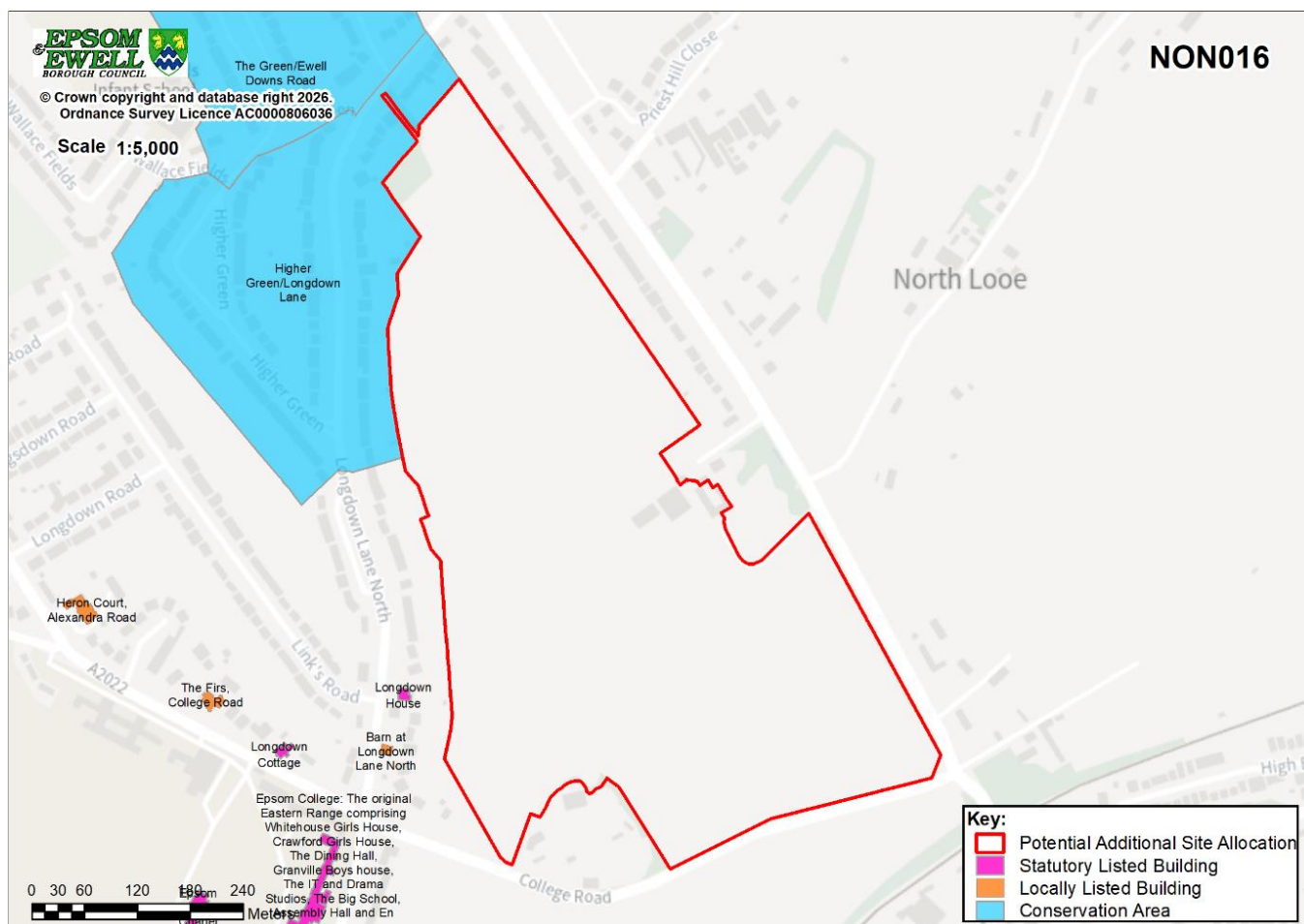
- Higher Green/Longdown Lane
- The Green/Ewell Downs Road

### Statutory listed buildings (Grade II)

- Longdown House
- Longdown Cottage
- Epsom College: The original Eastern Range comprising Whitehouse Girls House, Crawford Girls House, The Dining Hall, Granville Boys house, The IT and Drama Studios, The Big School, Assembly Hall and English Department
- Epsom College Chapel

### Locally listed buildings:

- Barn at Longdown Lane North
- No 53 Heron Court (Nos1-7)
- No 35 Alexandra Road
- No 37 Alexandra Road



## **STEP 2: Contribution of the site to the significance of the heritage assets**

The Downs Farm site is located to the rear of houses fronting Longdown Lane North and Reigate Road. While the site is adjacent to the High Green Conservation Area it is not typically visible from public viewpoints with the Conservation Area, and makes limited contribution to its setting or significance, except perhaps for the mature trees along the boundary of the site in the north-west. Due to distance, existing residential built form and screening from trees and vegetation, Downs Farm is not greatly perceived from the Conservation Areas overall.

Longdown House (Grade II), an early 19<sup>th</sup> century two storey building, lies adjacent to the south-west boundary of the site, and is the closest Listed Building to the site. The site is screened from this heritage asset and the other heritage assets by the existing built form, mature vegetation and changes in topography. Each of these heritage assets, detailed in Step 1, are significant in their own right, however, it is not considered that the site itself makes much contribution to their setting or significance.

## **STEP 3: Impact of potential allocation on significance**

Residential development of the site would result in a substantial change to its character. However, given the existing mature vegetation along the site boundary, the topography, and the built form adjacent to the site and nearby heritage assets, it is not expected that allocating the site would have a notable impact on the setting or significance of the Conservation Areas or the Listed Buildings.

The Locally Listed Barn at Longdown Lane North is located to the front of a residential property and is separated from the site by existing dwellings, mature vegetation, and changes in topography. There will be limited to no impact on the setting or significance of this heritage asset.

The precise level of harm would depend on the nature, design, and scale of proposals brought forward at the planning application stage.

## **STEP 4: Enhancements**

There is limited to no opportunity for enhancements to the significance or setting of the Conservation Areas to the north-west and listed buildings to the south-west.

## **STEP 5: Appropriateness in light of NPPF soundness tests**

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the potential development, the area of the overall site and the public benefit arising from development, there is no evidence to suggest that the principle of allocating the site would be unsound.