

**Epsom & Ewell Local Plan Examination**  
**Matter 11**  
**Site Allocations**

**12 September 2025**

## **Issue 13: Whether the proposed site allocations within the Plan are positively prepared, justified, effective and consistent with national policy**

**All site allocations:**

**Q13.1 The following questions relate to all of the site allocations as identified within Chapter 4 Planning for Places part of the Plan. The Council should provide a full response for each allocation, and I suggest a table format is used to provide a response for each allocation referred to:**

**Are the site allocations correctly drawn and are the boundaries justified?**

**What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?**

**In what way does the allocation identify the infrastructure requirements necessary, together with the timing for any necessary infrastructure?**

**Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?**

**Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? Should these figures be identified as minimum capacity figures within the policy wording?**

**Do these capacity figures concur with the indicative density figures provides at paragraph 7.2 (supporting text) to policy S11? If not why not?**

**In terms of the identified uses and policy considerations, are these based on sound evidence?**

**Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?**

**Quite a number of the sites which the Council are identifying as site allocations are existing car parks (Policies SA5, SA6, SA9, SA2, SA2) and a number of the representatives have expressed concerns regarding the loss of car parking. I have had regard to the information contained within section 3 of HB06b in framing the questions below:**

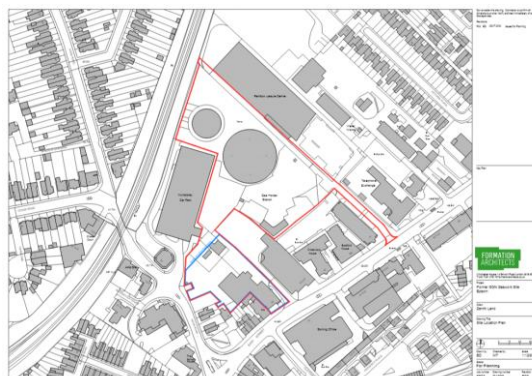
A proforma providing the requested site information for each allocation in the Local Plan (SA1 – SA35) is detailed below. There are some changes proposed, including the removal of 4 allocations due to changes in their deliverability. In addition, the capacity of a limited number of sites has been revised.

## 13.1 SA1 – Southern Gas Network Site

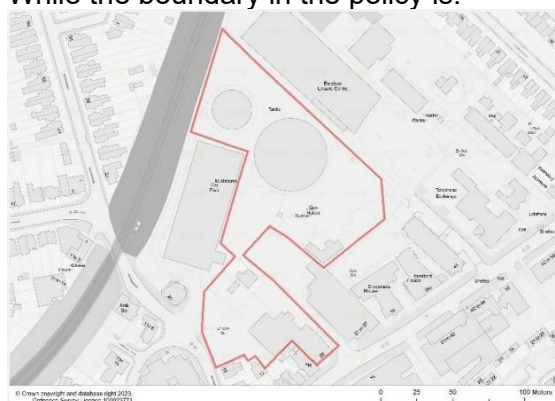
1. Are the site allocations correctly drawn and are the boundaries justified?

While the site boundary is based on the submitted through the call for sites, it could be amended to reflect that Site Plan as illustrated in the recently approved planning application.

Site Location Plan for 24/01107/FUL is:



While the boundary in the policy is:



We would be happy to amend the boundary if this is considered necessary.

2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?

A planning application was approved subject to S106 (24 April 2025)

The site requires decontamination work to be undertaken prior to construction work commencing and this is reflected in the revised trajectory with completions due to start in 2027.

The housing trajectory shows the site is expected to deliver 455 units in total with 225 units in 2027/28, 115 units in 2028/29 and 115 units in 2029/30. This is based on engagement with the developer in September 2025.

<p>3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure</p>	<p>There are no infrastructure requirements listed specific to this site allocation. However, site specific measures have been recommended by the Highway Authority during the planning application process (improvements to bus stops along East Street and a signalised crossing at the Hook Road / East Street junction).</p>
<p>4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?</p>	<p>SA1 takes onboard the suggested wording of:</p> <ul style="list-style-type: none"> <li>a) Between 400-640 new homes (across SA1 &amp; SA2) but excludes specialist accommodation.</li> <li>b) A performing arts centre</li> <li>c) Public realm (a 'neighbourhood park') and connectivity improvements by providing a 'linear open space'</li> </ul> <p>SA1 amends the wording of the 'new public square' &amp; 'neighbourhood park' to a "linear open space".</p> <p>SA1 doesn't include the wording of</p> <ul style="list-style-type: none"> <li>a) <i>'mixed use ground floor active frontages providing Class E (Commercial, Business and Service) floorspace'</i></li> <li>b) Reference to building heights (in order to provide flexibility)</li> <li>c) Podium parking with smart technology (dealt with in the planning application)</li> <li>d) Relocating the SGN infrastructure - the relocation of SGN infrastructure was subject to a separate planning permission which was granted in 2024.</li> </ul>
<p>5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory?</p> <p>6. Should these figures be identified as minimum capacity figures within the policy wording?</p>	<p>Yes,</p> <p>The planning application (approved, subject to S106) states that 456 residential dwellings (Use Class C3) are to be provided and that the Laine Theatre Arts building is to be demolished and re-provided, comprising of 6,080 sqm of new floorspace.</p> <p>Both these provisions are in line with what Policy SA1 is allocated for:</p>

	<p>“Approximately 455 dwellings (C3) and a bespoke performing arts centre for the Laine Theatre Arts”</p> <p>They should not be considered as minimum capacity figures, as these figures are informed by the planning application process and developer intentions.</p>
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, it does align with the indicative density figures of Policy S11 (para. 7.2). At a density of ~295dph, this is significantly above the minimum of 80dph for town centre locations.
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	<p>Yes, they have been informed by the consented Planning Application (24/01107/FUL).</p> <p>The Town Centre Masterplan (document reference HB06a) is also a key piece of evidence and was a key consideration</p>
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	<p>Yes, the Heritage Topic Paper (<a href="#">TP06</a>, p. 20) identifies an adjacent Conservation Area and a number of nearby Statutory Listed Buildings.</p> <p>SA1 and criterion g) refers to conserving and, where possible, enhance nearby heritage assets, which include Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings that adjoin the site.</p> <p>In addition, the impact on nearby heritage assets was considered during the planning application process.</p>

## 13.2 SA2 – Hook Road Car Park

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, the boundary reflects ownership and the Call for Sites (2022) submission.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	<p>The site requires decontamination work to be undertaken prior to construction work commencing. This is anticipated to take place with adjoining site SA1.</p> <p>A planning application for the site is expected in 2026 and the scheme is anticipated to deliver approximately 150 residential units in 2029/30.</p> <p>This is based on engagement with the EEBC Property Team in September 2025.</p>
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	<p>SA2 takes onboard the suggested wording of:</p> <ul style="list-style-type: none"> <li>Between 400-640 new homes (across SA1 &amp; SA2) but excludes specialist accommodation.</li> </ul> <p>SA2 doesn't include the wording of</p> <ul style="list-style-type: none"> <li><i>'mixed use ground floor active frontages providing Class E (Commercial, Business and Service) floorspace'</i></li> <li>Reference to building heights, to allow for flexibility in the site coming forward</li> <li>Podium parking with smart technology</li> </ul>

<p>5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory?</p> <p>6. Should these figures be identified as minimum capacity figures within the policy wording?</p>	<p>Yes, the allocation of approx. 150 dwellings is reflective of discussions with the Council's Property Team &amp; this is as presented in the housing trajectory.</p> <p>No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.</p>
<p>7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?</p>	<p>Yes, it does align with the indicative density figures of Policy S11 (para. 7.2). At a density of ~313dph, this is significantly above the minimum of 80dph for town centre locations.</p>
<p>8. In terms of the identified uses and policy considerations, are these based on sound evidence?</p>	<p>Yes, the identified use is based on the Call for Sites submission provided by the landowner. The site has been assessed through the Land Availability Assessments (see document HB01a &amp; HB01b for 2024 LAA main document and maps) and the Site Assessment Methodology (document HB05).</p> <p>The Town Centre Masterplan (document HB06a) assesses site options for the site in conjunction with SA1; and the policy criterion h) identified the importance of designing the site with SA1 in mind.</p> <p>The policy has been informed by heritage impacts, as evidenced in the Heritage Topic Paper (document TP06); addressing and mitigating surface water flood risk, as evidenced in the Level 2 SFRA (document: NE04).</p>
<p>9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?</p>	<p>Yes, Topic Paper 06 identifies a nearby Conservation Area and Statutory Listed Buildings.</p> <p>Criterion (f) states any developer will be required to: "Conserve and, where possible, enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings."</p>

### 13.3 SA3 – Solis House, 20 Hook Road

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, the site boundary represents ownership and is as submitted in the Call for Sites (2023).
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	<p>The site was expected to be delivered in the year 2028/29. Although the site owner, in their Call for Sites submission (April 2023) expected the site to come forward in years 5-10 of the Plan period.</p> <p>A planning application is required to be submitted and based on recent engagement with the landowner (June 2025) the Council expect that the earliest the site could come forward is now 2029/30.</p>
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	<p>SA3 takes onboard the suggested wording of:</p> <ul style="list-style-type: none"> <li>Between 400-640 new homes (across SA1 &amp; SA2) but excludes specialist accommodation.</li> </ul> <p>SA2 doesn't include the wording of</p> <ul style="list-style-type: none"> <li><i>'mixed use ground floor active frontages providing Class E (Commercial, Business and Service) floorspace'</i></li> <li>Reference to building heights, to allow for flexibility in the site coming forward</li> <li>Podium parking with smart technology</li> </ul>
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory?	Yes, the allocation of approx. 20 dwellings (C3) is as presented in the housing trajectory.
6. Should these figures be identified as minimum capacity figures within the policy wording?	No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.



<p>7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?</p>	<p>Yes, it does align with the indicative density figures of Policy S11 (para. 7.2). At a density of ~286dph, this is above the minimum of 80dph for town centre locations.</p>
<p>8. In terms of the identified uses and policy considerations, are these based on sound evidence?</p>	<p>Yes, the identified use is based on the Call for Sites submission provided by the landowner. The site has been assessed through the Land Availability Assessments (see document HB01a &amp; HB01b for 2024 LAA main document and maps) and the Site Assessment Methodology (document HB05).</p> <p>The allocation is informed by the TCMP (document reference <a href="#">HB06</a>) in terms of residential use.</p> <p>The policy has been informed by addressing and mitigating surface water flood risk, as evidenced in the Level 2 SFRA (document: NE04).</p>
<p>9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?</p>	<p>Yes, TP06 identifies a nearby Conservation Area and Statutory Listed Buildings.</p> <p>Criterion (f) states any developer will be required to: “Conserve and, where possible, enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings.”</p>

#### 13.4 SA4 – Bunzl, Hook Road

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, the boundary on the recent planning applications (24/00230/FUL & 23/01440/PDCOU).
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	Development has commenced and is currently under construction.  This is consistent with the trajectory which shows commencement and completion between 2025 and 2026.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 6. Should these figures be identified as minimum capacity figures within the policy wording?	No, the allocation, of approx. 20 dwellings (C3), needs to be amended to 35 units, to reflect the planning permissions granted in January 2024 (ref: 23/01440/PDCOU) and February 2025 (ref: 24/00230/FUL) and which have since commenced.  No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, it does align with the indicative density figures of Policy S11 (para. 7.2). At a density of ~118dph (20 units) or ~205dph (35 units), this is above the minimum of 80dph for town centre locations.
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes, the site has prior approval consent to create 24 dwellings and extension of an additional storey for 11 units, currently under construction.
9. Where necessary, do the site allocations refer to any heritage considerations which	Yes, TP06 identifies a nearby Conservation Area and Statutory Listed Buildings.

would need to be taken into account as set out within document TP06?	Criterion (b) states any developer will be required to: Conserve and, where possible, enhance heritage assets, including the Adelphi Road Conservation Area and the setting of nearby Grade II listed buildings at 10 and 12 Hook Road.
--	---

### 13.5 SA5 – Epsom Town Hall

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on site ownership.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 50 units in 2027/28 and 40 units in 2028/29.  This is based on engagement with the EEBC Property Team in September 2025
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	The allocation is informed by the TCMP (document reference <a href="#">HB06</a> ) in terms of residential use and capacity (circa 90 units).  The Local Plan allocation does not specify building heights or state that re-provision of public parking elsewhere is required.  The LP also does not specify total redevelopment of the Town Hall, although this is implied by the Town Centre Masterplan.
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 6. Should these figures be identified as minimum capacity figures within the policy wording?	Yes, the quantum is correct.  No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at a density of ~120dph it exceeds minimum of 80dph for town centre sites.
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes. The allocation is informed by the TCMP (document reference <a href="#">HB06</a> ) in terms of residential use and capacity (circa 90 units).
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	Yes,  TP06 identifies a nearby Conservation Area and Statutory Listed Buildings.

	<p>Criterion (f) states any developer will be required to: Conserve and, where possible, enhance the setting of the Epsom Town Centre Conservation Area and the Grade II listed 'Old Pines' that are located in close proximity to the site.</p>
--	--

## 13.6 SA6 – Hope Lodge Car Park

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes. This is based on Call for Sites (2023) submission and aligns with site ownership.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 30 units in 2031/32. This is based on discussions with the EEBC Property Team in September 2025.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	<p>The TCMP (<a href="#">HB06a</a>, p. 71) identifies the site for residential in line with SA6. While the TCMP provides a capacity of 39 dwellings, SA6 provides for approx. 30 dwellings, to provide flexibility having regard to the adjacent Grade II Listed Building.</p> <p>The TCMP prescribes a building height of up to 5 stories while SA6 makes no mention of building heights, in order to allow for flexibility in the site coming forward.</p> <p>Finally, the TCMP refers to the 'total redevelopment of Hope Lodge Car Park', which is not stated in SA6, however, this is implied in the policy.</p>
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory?	Yes & yes.
6. Should these figures be identified as minimum capacity figures within the policy wording?	No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	No, at a density of ~70dph it does not exceed the minimum of 80dph for town centre sites. This is because of the close proximity of the Grade II Listed 'Hope Lodge' immediately adjacent, which this site wraps around. This heritage asset limits the density that is suitable for this location.
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes. The allocation is informed by the TCMP (document reference <a href="#">HB06</a> ) in terms of residential use and a slightly reduced capacity to reflect the proximity to a listed building

9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	Yes, SA6 takes into account the heritage considerations detailed on pg. 27 of the Heritage Topic Paper (document <a href="#">TP06</a> ). Specifically, to conserve and, where possible, enhance the setting of the Grade II Listed Hope Lodge.

### 13.7 SA7 – Former Police and Ambulance Station Sites

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes (based on planning application's Site Plan)
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 47 units (C3 equiv.) in 2027/28. This is based on correspondence with the agent on the application in January 2025, which confirmed commencement for early 2026.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. 5. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	Not specifically mentioned in the TCMP, as SA7 is based on a planning permission (ref: 22/00923/FUL)
6. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 7. Should these figures be identified as minimum capacity figures within the policy wording?	Yes, on the basis that 85 extra units (C2) is equivalent of 47 units (C3) (at a ratio of 1.8)  N/A, figures are exact in this instance, as they are based on a planning application (22/00923/FUL)
8. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at a density of ~125dph, this is above the minimum of 80dph for town centre locations.
9. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes, through planning application details
10. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	Yes, SA7 takes into account the heritage considerations detailed on pg. 28 of the Heritage Topic Paper (document <a href="#">TP06</a> ). SA7 makes specific reference to protecting and enhancing No. 45 Church Street ('The Hermitage', Grade II), which is located to the east of the site.  SA7 does not, however, make reference to Nos. 32 & 34 The Parade ('Ashley Cottages', Grade II) located to the south-west of the site or the No. 14 Church Street ('The Cedars', Grade II*) located to the south-east of the site although this



	is separated by a building at No. 12 Church Street.
--	---

## 13.8 SA8 – Epsom Clinic

1. Are the site allocations correctly drawn and are the boundaries justified?	<p>Yes, the site allocation is based on the ownership boundary of the Epsom Clinic site.</p> <p>However, we are aware that the landowner is now in discussions to secure additional land belonging to a third party which will expand site area.</p>
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 35 units in 2028/29. This is based on engagement with the landowner in September 2025.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	<p>The TCMP (<a href="#">HB06a</a>, p. 74) specifies the site for residential use, which aligns with SA8.</p> <p>Note there is a difference in the site boundaries between the TCMP and SA8. The TCMP includes land owned by a third party, land immediately adjacent to Dulshott Green (highway, to north west of site)</p> <p>The landowners (NHS Property) are aware of this and are working with the third party to determine whether additional land can be made available.</p> <p>The TCMP states a capacity of 35 units as opposed to 30 units in SA8. The TCMP suggests a potential range of 3-5 stories while SA8 does not specify building heights in order to allow for flexibility in the site coming forward.</p>
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory?	No (the quantum could be increased to 35 units) & no (the trajectory could be amended to 35 units)
6. Should these figures be identified as minimum capacity figures within the policy wording?	No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.

<p>7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?</p>	<p>Yes, at a density of ~175dph (30 units) or 205dph (35 units), this is above the minimum of 80dph for town centre locations.</p>
<p>8. In terms of the identified uses and policy considerations, are these based on sound evidence?</p>	<p>Yes. The allocation is informed by the TCMP (document reference <a href="#">HB06</a>) in terms of residential use and capacity.</p>
<p>9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?</p>	<p>Yes, SA8 takes into account the core heritage considerations detailed on pg. 31 of the Heritage Topic Paper (document <a href="#">TP06</a>). SA8 makes specific reference to protecting and enhancing the setting of the Church Street Conservation Area which adjoins the site and the Grade II Listed Hope Lodge to the north.</p> <p>However, it does not specifically refer to the Cedars Grade II* Listed Building and the following Grade II Listed Buildings:</p> <ul style="list-style-type: none"> <li>• The Hermitage,</li> <li>• Ashley Cottages</li> <li>• Rosebery Cottage</li> </ul> <p>The majority of the above heritage assets are screened by other development located between them and the development site.</p>

### 13.9 SA9 – Depot Road and Upper High Street Car Park

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes (based on ownership and 2022 Call for Sites submission)
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	<p>The site is expected to deliver 50 units in 2030/31 and 50 units in 2031/32.</p> <p>This is based on engagement with EEBC Property Team in September 2025.</p>
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	<p>The TCMP (<a href="#">HB06a</a>, p. 77) states that the site could comprise at least 100 units &amp; public parking reprovision, which aligns with SA9, of approx. 100 units and the decked public car park.</p> <p>The TCMP (<a href="#">HB06a</a>, p. 77) states a new access road may be necessary and SA9 states that appropriate vehicle access to the site from Upper High Street and Church Steet will be required.</p>
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? Should these figures be identified as minimum capacity figures within the policy wording?	<p>Yes &amp; yes</p> <p>No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.</p>
6. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at a density of ~80dph, this is aligned with the minimum of 80dph for town centre locations.
7. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes. The allocation is informed by the TCMP (document reference <a href="#">HB06a</a> ) in terms of residential use and capacity.
8. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	<p>Yes. SA9 has regard to the setting of the adjoining Pikes Hill Conservation Area.</p> <p>The other heritage assets detailed on p.33 of the Heritage Topic Paper (document <a href="#">TP06</a>) are screened by other development and it is not considered necessary to specify them in the policy. While the Area of High Archaeological</p>

	Potential is reflected in the Topic Paper and SA9.
--	--

### 13.10 SA10 – 79-85 East Street

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on planning applications for the sites.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 34 units in 2028/29. This is based on engagement with Agents on the applications (22/01953/FUL & 22/01954/FUL) in September 2025.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? Should these figures be identified as minimum capacity figures within the policy wording?	Yes & yes.  No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
6. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at a density of ~160dph, this is above the minimum of 80dph for town centre locations.
7. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes, through planning application details.
8. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	Yes, SA10 has regard to the setting of Lintons Lane Conservation Area and Grade II Listed buildings, in line p. 35 of the Heritage Topic Paper (document <a href="#">TP06</a> ). SA10 does not however refer to Providence Place Conservation Area, which is referred to in TP06 as this is sufficiently far away from the site and screened by other development.

### 13.11 SA11 – Finachem House, 2 – 4 Ashley Road

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on Call for Sites (2022) submission.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	Site is expected to deliver 20 units in 2028/29. This is based on engagement with the Agent for the landowner in September 2025, however, Agent notes that at this capacity (20 units) the site is not viable.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	<p>Option 2 of 'Ashley Centre and Global House' in the TCMP (HB06a, para. 5.6) details the potential for the site to include SA11 as well. This option suggests a possible 125 units across the whole site, which equates to c. 50 units on Finachem House &amp; the rear section of the House of Fraser Store (i.e. not including Global House), while this is somewhat higher than 20 units detailed in SA11, this also includes the rear section of the former House of Fraser store, and as a result the figures of SA11 and the TCMP could be considered to be broadly similar.</p> <p>The TCMP (HB06a, p. 58) indicates a potential height of 8 stories for Finachem House which we have not included in order to allow for flexibility for the site coming forward.</p>
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory?	Yes & yes
6. Should these figures be identified as minimum capacity figures within the policy wording?	No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at a density of ~165dph, this is above the minimum of 80dph for town centre locations.

<p>8. In terms of the identified uses and policy considerations, are these based on sound evidence?</p>	<p>Yes. The allocation is informed by the TCMP (document reference <a href="#">HB06a</a>) and planning history in terms of residential use and capacity</p>
<p>9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?</p>	<p>Yes, SA11 has regard to the setting of Epsom Town Centre Conservation Area and Grade II* Listed 'Ashley House' which adjoins the site to the north, in line p. 37 of the Heritage Topic Paper (document <a href="#">TP06</a>).</p> <p>The Area of High Archaeological Potential is also reflected in the Topic Paper and SA11.</p>



## 13.12 SA12 – Global House

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, the boundary is based on the site of Global House only. This has been amended since the LAA (2024) (see site reference 'TOW024' in document <a href="#">HB01b</a> ) which reflects the Ashley Centre as a whole. The site boundary was reduced to reflect the developable area.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 75 units in 2029/30. This is based on engagement with the Agent promoting the site in September 2025.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	<p>The TCMP (<a href="#">HB06a</a>) refers to the Ashley Centre &amp; Global House, while SA12 only refers to Global House, so we disregard the suggested wording relevant to the Ashley Centre more broadly.</p> <p>The TCMP suggests the provision of at least 70 homes, while SA12 allocates for approx. 75 dwellings and so this broadly aligns.</p> <p>The buildings height suggested in the TCMP are between 5-8 stories, while SA12 does not stipulate building heights in order to allow for flexibility.</p>
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory?	Yes & yes
6. Should these figures be identified as minimum capacity figures within the policy wording?	No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at a density of ~260dph, this is above the minimum of 80dph for town centre locations.
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes. The allocation is informed by the TCMP (document reference <a href="#">HB06a</a> ) in terms of residential use and capacity
9. Where necessary, do the site allocations refer to any heritage considerations which	The Heritage Topic Paper (document <a href="#">TP06</a> on pp. 39-40) details a number of Listed Buildings and the nearby Epsom Town Centre Conservation Area, which

would need to be taken into account as set out within document TP06?	is reflected in SA12 which states that any developer of the site will be required to conserve, and where possible enhance, the setting of the nearby Conservation Area and Listed Buildings.
--	--

## 13.13 SA13 – Swail House

1. Are the site allocations correctly drawn and are the boundaries justified?

Yes & yes, the site boundary is based on a Call for Sites (2023) submission and is broadly reflective of ownership. There are, however, some minor adjustments that could be made to the boundary to reflect the Title Deed:



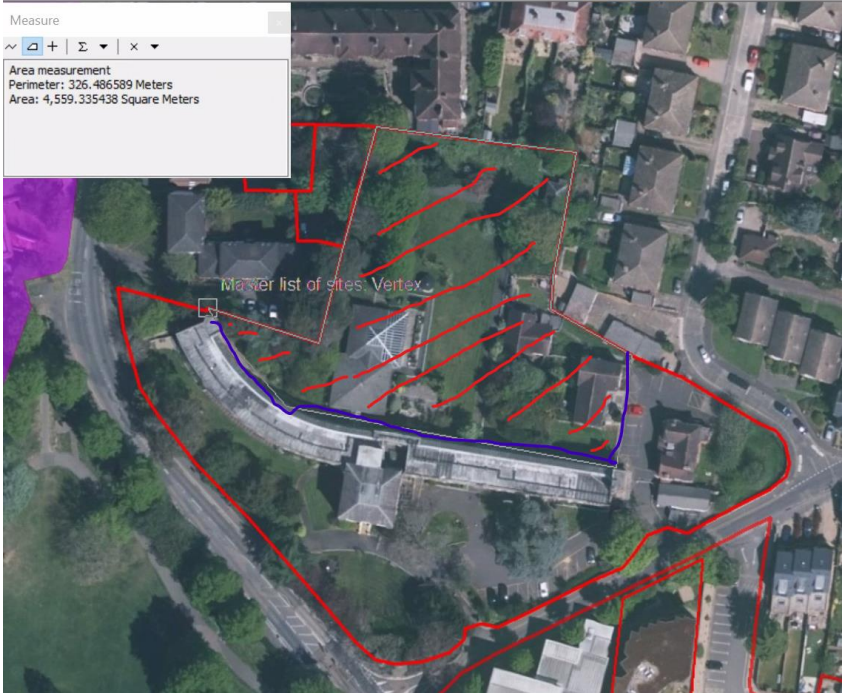

The Allocation boundary is copied below:



2. What is the expected lead time in terms of the timescale for development and annual

The site is expected to deliver 48 units in 2027/28. The planning application (ref: 25/00368/FUL) currently under consideration and is expected to go to Committee in October 2025. Following engagement with the landowners in September 2025 the timeline is appropriate if the planning application is granted.

delivery rates and are these based on sound evidence?	
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 6. Should these figures be identified as minimum	<p>Yes (approx. 45 units is correct, although the exact number detailed in the planning application is 48 units) &amp; yes.</p> <p>No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.</p>

<p>capacity figures within the policy wording?</p>	
<p>7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?</p>	<p>The site is located outside of Epsom Town Centre but is near a transport hub and so a minimum of 60dph applies. This site is expected to deliver 45 dwellings (net) which would result in a density of ~40dph, however, this doesn't take into account the retention/refurbishment of Swail House and so the 'developable' area is reduced to approx. 0.45ha (area north of Swail House building) which results in a density of ~100dph.</p>  <p>Based on the landscape plan below from 25/00368/FUL:</p> 

<p>8. In terms of the identified uses and policy considerations, are these based on sound evidence?</p>	<p>Yes. the identified uses have been informed by a call for sites submission, discussions with the land owner, the SFRA and Heritage Topic Paper.</p>
<p>9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?</p>	<p>The Heritage Topic Paper (document <a href="#">TP06</a> on pp. 41-42) details a number of nearby Listed Buildings and the nearby Church Street Conservation Area. SA13 states that any developer of the site will be required to conserve, and where possible enhance, the setting of the nearby Conservation Area and the Grade II 'Garden Wall to Swail House', but not the Grade II 'Melrose Cottage' located to the east of the site, a sufficient distance away.</p> <p>In addition, the allocation requires the refurbishment of the Locally Listed Swail House</p>

### 13.14 SA14 – 60 East Street

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on the site plan from planning application (ref: 24/00900/PDCOU) & reflected in site ownership.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 30 units in 2026/27.  This is based the recent planning permission (approved in December 2024) and that the site is currently 'under offer', as of September 2025.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 6. Should these figures be identified as minimum capacity figures within the policy wording?	Yes & yes  No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at a density of ~125dph, this is above the minimum of 80dph for town centre locations.
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes, based on planning permission.
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	None

### 13.15 SA15 – Corner of Kiln Lane and East Street (101b East Street)

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on Call for Sites (2023) submission and land ownership.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 5 units in 2028/29. This is based on engagement with the landowner in September 2025.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 6. Should these figures be identified as minimum capacity figures within the policy wording?	Yes & yes  No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at ~165dph this is above the minimum density figures laid out in Policy S11 (para. 7.2)
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes set promoted through call for sites and landowner has confirmed intention to develop.
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	None



### 13.16 SA16 – Land at Kiln Lane

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on Call for Sites (2023) submission and site ownership.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 40 units in 2034/35. This is based on engagement with the landowner in September 2025.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 6. Should these figures be identified as minimum capacity figures within the policy wording?	Yes & yes  No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at ~60dph this is above the minimum density figures laid out in Policy S11 (para. 7.2)
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes, the site has been promoted through the call for sites for residential use. The site adjoins a residential development and gypsy and traveller site so residential uses are considered suitable in this location.
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	None.

### 13.17 SA17 – Hatch Furlong Nursery

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes (based on 2023 Call for Sites submission)
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 15 units in 2029/30 and 15 units in 2030/31.  This is based on engagement with the landowner in September 2025.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory?	Yes & yes (however years of completion have shifted back 1 year to reflect uncertainty of delivery).
6. Should these figures be identified as minimum capacity figures within the policy wording?	No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at ~75dph this is above the minimum density figures laid out in Policy S11 (para. 7.2)
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes. The identified uses have been informed by discussions with the land owner, call for sites submission. Policy considerations include the SFRA.
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	The Heritage Topic Paper (document <a href="#">TP06</a> ) identifies the nearby Ewell Village Conservation Area but acknowledges that this site is separated from the Conservation Area by Ewell Bypass, and makes little contribution to the Conservation Area. SA17 therefore doesn't refer to the Conservation Area in the policy.

### 13.18 SA18 – Land to the Rear of Rowe Hall

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on the planning application & land ownership.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 96 units (C3 equivalent) in 2028/29. This is based on engagement with the landowner in August 2025 and intentions to commence development following the recent planning permission (ref: EP23/00633/CMA).
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation. See planning application for access changes to site & adjacent Scout Hut along Salisbury Road.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 6. Should these figures be identified as minimum capacity figures within the policy wording?	Yes & yes. The site allocation details 96 units which are self-contained extra care accommodation (Class C2). While this would usually be converted to C3 by dividing by 1.8; it was deemed by the DM Planning Officer on the application that the units could be classed as C3 given their self-contained nature.  N/A, as the quantum is based on a planning application (ref: EP23/00633/CMA)
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at ~80dph this is above the minimum density figures laid out in Policy S11 (para. 7.2)
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes, based on planning permission.
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	None

### 13.19 SA19 – 7 Station Approach

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on site plan for submitted planning applications.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	<p>There is an application approved (subject to s106) on site (ref: 25/00404/FUL) for 9 units (gross), 8 units (net).</p> <p>The site is expected to be delivered in 2027/28. This is based on engagement with the Agent, in September 2025, on the application who confirms landowner's intention to complete development within 5 years.</p>
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
<p>5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory?</p> <p>6. Should these figures be identified as minimum capacity figures within the policy wording?</p>	Since the publication of the Regulation 19 Local Plan a subsequent application (ref: 25/00404/FUL) has been approved on site (subject to S106) for 9 units (gross) or 8 units (net)
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at ~125dph this is above the minimum density figures laid out in Policy S11 (para. 7.2)
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes - call for sites submission and planning application.
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	N/A

## 13.20 SA20 – Esso Express, 26 Reigate Road

1. Are the site allocations correctly drawn and are the boundaries justified?	<p>The site boundary has been amended following engagement with the landowner and since the Call for Sites (2023) submission.</p> <p>The boundary now reflects the part of the site confirmed as available for development, that is, excluding the Esso Garage to the south-east. Therefore, the boundary is correctly drawn and justified.</p>
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 10 units in 2028/29. This is based on engagement with the landowner in September 2025, who expects the site to be delivered within 5 years.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory?	Yes & yes
6. Should these figures be identified as minimum capacity figures within the policy wording?	No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	<p>The site has a density of 40dph, and as it considered not to be near a transport hub the site complies with the <i>minimum</i> densities set out in Policy S11 (para. 7.2).</p> <p>Capacity on the site is constrained by its irregular shape and location, to the rear of a garage and surrounding building heights, which reduce potential capacity.</p>
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Call for sites submission and landowner engagement.

9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	The Heritage Topic Paper ( <a href="#">TP06</a> ) notes the nearby Ewell Village Conservation Area but concludes that the site makes little contribution to it and so SA20 does not specifically refer to preserving or enhancing it in the policy.
<b>13.21 SA21 – Richards Field Car Park</b>	
1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on Call for Sites (2023) submission and site ownership.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 7 units in 2028/29. This is based on engagement with EEBC Property Team in September 2025.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory?	Yes & yes
6. Should these figures be identified as minimum capacity figures within the policy wording?	No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at 100dph this is above the minimum density figures laid out in Policy S11 (para. 7.2)
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Call for sites submission, suitable location for residential development.
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	N/A

### 13.22 SA22 – Etwelle House, Station Road

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on pre-application submission (2022) and site ownership.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 20 units in 2029/30.  This is based on engagement with the Agent promoting the land in September 2025.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 6. Should these figures be identified as minimum capacity figures within the policy wording?	Yes & yes  No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at 100dph this is above the minimum density figures laid out in Policy S11 (para. 7.2)
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Identified uses compatible with location adjoining a railway station. Planning History indicates that the site is acceptable for residential use.
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	N/A

### 13.23 SA23 – 140-142 Ruxley Lane

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, the site boundary is based on a planning application and site ownership.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	Development on the site has commenced.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 6. Should these figures be identified as minimum capacity figures within the policy wording?	Yes & yes  No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at 60dph this is above the minimum density figures laid out in Policy S11 (para. 7.2)
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Planning permission granted and permitted
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	N/A



13.24 **SA24 – Garages at Somerset Close & Westmorland Close -**  
**ALLOCATION RECOMMENDED TO BE REMOVED**

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on site ownership.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	<b>No longer expected to deliver within the first 5 years.</b>  Site may come forward as windfall but is not to be specifically included in the Trajectory. This is following engagement with the landowners who do not intend to deliver within 5 years.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 6. Should these figures be identified as minimum capacity figures within the policy wording?	-
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	-
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	-
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	N/A

### 13.25 SA25 – 64 South Street Epsom –

#### **ALLOCATION RECOMMENDED TO BE REMOVED**

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on site ownership.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	<b>No longer expected to deliver (no longer available)</b>  The initial planning application (20/00041/FUL) has since lapsed, and we have not received confirmation from landowner of intention to redevelop site.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 6. Should these figures be identified as minimum capacity figures within the policy wording?	-
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	-
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	-
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	-

### 13.26 SA26 – 35 Alexandra Road

#### ALLOCATION RECOMMENDED TO BE REMOVED

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on Call for Sites (2022) submission.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	<b>No longer expected to deliver.</b> Developer intentions have changed, following planning application refusal of previously scheme.  Land owner intending to deliver an HMO (of less than 5 units C3 equiv.)
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 6. Should these figures be identified as minimum capacity figures within the policy wording?	-
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	-
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	-
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	N/A

### 13.27 SA27 – 22-24 Dorking Road

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on planning application and site ownership.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	Landowner intentions have changed since planning application refused (ref: 19/01365/FUL). Intention for smaller scheme of 12 units (net) to be delivered in 2028/29, as per correspondence received from developer in May 2025.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory?	No, this should be amended to 12 units to reflect updated developer intentions.
6. Should these figures be identified as minimum capacity figures within the policy wording?	No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at ~165dph the site would be above the minimum density figures laid out in Policy S11 (para. 7.2)
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Suitable location for residential development. See planning application.
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	Yes, SA27 acknowledges the Grade II* & Grade II Listed Building in close proximity to the site, as shown on p. 57 of the Heritage Topic Paper (document reference <a href="#">TP06</a> ).

13.28 **SA28 – 63 Dorking Road -**

**ALLOCATION RECOMMENDED TO BE REMOVED**

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on site ownership
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	<p><b>No longer expected to deliver. (no confirmation of availability for specialist care home or C3 received by landowners)</b></p> <p>The site was allocated for Specialist Care Home provision based on a pre-application. Intentions for the site have since changed with a planning application for a Sainsbury's Local refused in May 2025.</p>
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory?	-
6. Should these figures be identified as minimum capacity figures within the policy wording?	
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	-
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	-
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	-

### 13.29 SA29 – 65 London Road

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on planning application.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is on not specifically listed in the Housing Trajectory as it was a commitment. Development has commenced on the site, and we expect the site to be completed in 2026/27.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory?	Yes & yes
6. Should these figures be identified as minimum capacity figures within the policy wording?	N/A, the quantum is based on a planning application (ref: 23/00817/FUL)
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at ~150dph the site would be above the minimum density figures laid out in Policy S11 (para. 7.2)
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes – based on commenced planning application
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	The Heritage Topic Paper (document reference <a href="#">TP06</a> ) identifies four Grade II Listed Buildings in close proximity to the site. SA29 reflects these in the policy.

### 13.30 SA30 – Epsom General Hospital

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on the planning applications on the site.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	Planning permission has been implemented (commenced), and the development is expected to be completed in 2026/27 - 2027/28.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation. See planning applications for CIL & S106 agreements.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory?	Yes (calculated as a C3 equivalent) and included in the commitments in Appendix 2.
6. Should these figures be identified as minimum capacity figures within the policy wording?	No, while the quantum is based on a planning application, we have allowed for variability (ref: 21/00252/FUL).
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Yes, at ~200dph the site would be above the minimum density figures laid out in Policy S11 (para. 7.2)
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes, based on planning application.
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	The Heritage Topic Paper (document reference <a href="#">TP06</a> ) on p. 63 identifies a number of Listed Buildings, however these are not located in close proximity to the site, as such SA30 does not stipulate that these heritage assets need to be enhanced or protected.

### 13.31 SA31 – Land at West Park Hospital (South)

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, the site boundary is based on Call for Sites (2022) submission and site ownership.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 50 units in 2028/29. This is based on engagement with Agents in September 2025.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 6. Should these figures be identified as minimum capacity figures within the policy wording?	Yes & yes  No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	The density on this site is 28dph, which is below the minimum density figures laid out in Policy S11 (para. 7.2).  This capacity is based on the site promoter's specified yield. We have not sought to increase the density on this site given its existing Green Belt and out of town location, with surrounding low-density development and protected trees on the site.
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes, identified use based on those contained in call for sites submission promoting this brownfield site for residential uses. Policy requirements informed by including the SFRA.
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	The site is located within the West Park Conservation Area, as identified in p. 65 on the Heritage Topic Paper (document reference <a href="#">TP06</a> ). SA31 reflects this heritage asset in the policy.



### 13.32 SA32 – Land at West Park Hospital (North)

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on Call for Sites submissions and land ownership.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 50 units in 2029/30, 50 units in 2030/31 and 50 units in 2031/32. This is based on engagement with Agents in September 2025.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 6. Should these figures be identified as minimum capacity figures within the policy wording?	Yes & yes  No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	At 150 units the density on this site is 40dph, which in line with the minimum density figures laid out in Policy S11 (para. 7.2).
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes, identified use based on those contained in call for sites submission promoting this brownfield site for residential uses.  Policy requirements informed by evidence including the SFRA.
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	The site is located within the West Park Conservation Area and nearby a Grade Listed Building, as identified in p. 65 on the Heritage Topic Paper (document reference <a href="#">TP06</a> ). SA32 reflects the Conservation Area, but does not mention the Grade II Water Tower, which we concede is an omission and should be incorporated in criterion e)

### 13.33 SA33 – Land at Chantilly Way

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on Call for Sites (2022) submission and site ownership.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 15 units in 2029/30 and 15 units in 2030/31. This is based on engagement with landowner in September 2025.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There are no infrastructure requirements specific to this site allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 6. Should these figures be identified as minimum capacity figures within the policy wording?	Yes & yes  No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	At 30 units the density on this site is 43dph, which in line with the minimum density figures laid out in Policy S11 (para. 7.2).
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes, promoted through call for sites for residential use and site adjoins established residential area.  Criteria informed by evidence base including the Level 2 SFRA.
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	The Heritage Topic Paper (document reference <a href="#">TP06</a> ) identifies the Grade II Listed 'Horton Farmhouse' in proximity to the site. SA33 refers to this Listed Building in the policy.

### 13.34 SA34 – Hook Road Arena

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, this is based on a Call for Sites (2022) submission and site ownership.
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	The site is expected to deliver 40 units in 2030/31, 40 units in 2031/32 and 20 units in 2032/33. This is based on engagement with EEBC Property Team in September 2025.
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	There allocation will deliver a new sports hub for the borough. No other specific infrastructure has been identified specific to the allocation.
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? 6. Should these figures be identified as minimum capacity figures within the policy wording?	Yes & yes  No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	Considering a developable area of 3.5ha and a capacity of 100 units, the density is 29dph, which is below the minimum density figures detailed in Policy S11 (para. 7.2).  This is considered acceptable given the edge of town location, low surrounding density and existing Green Belt and that parts of the site are affected by Surface Water Flooding.
8. In terms of the identified uses and policy considerations, are these based on sound evidence?	Yes, the playing pitch strategy and Sports Facilities Assessment identify the need for new sports provision in the borough, including sports pitches which will be provided on this council owned site. The 100 dwellings proposed are a form of enabling development and are to be located on the southern part of the site which is surrounded by development on three sides.

	Additional policy requirements have been informed by the SFRA.
9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	The Heritage Topic Paper (document reference <a href="#">TP06</a> ) identifies a number of Grade II Listed Buildings, a Conservation Area and a Locally Listed Asset near the site. However, it is not considered necessary to include this in policy SA34, given the distances from the site and that they are separated by other buildings. There is unlikely to be heritage impacts from development, as is noted on p. 70 of <a href="#">TP06</a> .

### 13.35 SA35 – Land at Horton Farm

1. Are the site allocations correctly drawn and are the boundaries justified?	Yes & yes, based on Call for Sites (2022) submission and site ownership.																						
2. What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	<p>According to the Statement of Common Ground (SoCG) (document reference <a href="#">SCG13</a>), signed in August 2025, delivery is expected in the following years:</p> <table><tr><th>Year</th><th>30/31</th><th>31/32</th><th>32/33</th><th>33/34</th><th>34/35</th><th>35/36</th><th>36/37</th><th>37/38</th><th>38/39</th><th>39/40</th></tr><tr><td>SA35: Horton Farm</td><td>50</td><td>100</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>50</td></tr></table> <ul style="list-style-type: none"><li>An appropriate phasing plan would be prepared to accompany the planning application, which would specify the delivery of infrastructure, and any required obligations would be agreed via the S106 agreement, at the planning application stage.</li></ul>	Year	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	SA35: Horton Farm	50	100	150	150	150	150	150	150	150	50
Year	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40													
SA35: Horton Farm	50	100	150	150	150	150	150	150	150	50													
3. In what way does the allocation identify the infrastructure requirement necessary, together with the timing for any necessary infrastructure	<p>As set out in the SoCG (document reference <a href="#">SCG13</a>) signed in August 2025, the site will deliver a range of infrastructure, including:</p> <ul style="list-style-type: none"><li>Appropriate vehicle, pedestrian and cycle access to the site and enable the site to be served by public transport to include the provision of appropriate bus priority, and other passenger transport facilities.</li><li>A community building, capable of accommodating early years education provision and other community uses – subject to the needs of the locality.</li><li>Additional primary care capacity required to serve local needs. This could take the form of on-site provision or an equivalent financial contribution towards off-site provision of new or improvement to existing health facilities. The form of required</li></ul>																						

	<p>additional primary care provision will be determined in consultation with the NHS at the time the site comes forward.</p> <ul style="list-style-type: none"> <li>• A public park of approximately 7ha within the land to the north of the site incorporating walking, cycling routes, equestrian routes and measures for surface water management and biodiversity enhancement.</li> <li>• Sustainable drainage measures to address and mitigate the risk of surface water flooding.</li> </ul> <p>Given the scale of proposed development at the site, it is likely that infrastructure would need to be phased to ensure it is delivered at the optimal time to meet required need to ensure success and viable utilisation. An appropriate phasing plan will be prepared to accompany a planning application, and any required obligations will be agreed via the Section 106 agreement, at the planning application stage.</p>
4. Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?	N/A
5. Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory?	Yes & yes
6. Should these figures be identified as minimum capacity figures within the policy wording?	No, the figures should not be identified as a minimum, as we intend the policy to allow for flexibility.
7. Do these capacity figures concur with the indicative density figures provides at the supporting text to policy? If not, why not?	The site is expected to deliver 1,250 units over a developable area of 30ha. Therefore, the density of residential units is 42dph. Which is above the minimum densities set out in Policy S11 (para. 7.2).

<p>8. In terms of the identified uses and policy considerations, are these based on sound evidence?</p>	<p>Yes, the identified uses will assist in meeting development needs including housing, gypsy and traveller needs, specialist housing and a new public park to serve the development.</p> <p>The requirements have been informed by evidence including the SFRA, gypsy and traveller accommodation assessment (and topic paper), in addition to engagement with health and education providers.</p>
<p>9. Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?</p>	<p>Yes, Policy SA35 specifically identifies the Grade II Listed 'Horton Farm House' which is located within the site and identified on p. 71 of The Heritage Topic Paper (document reference <a href="#">TP06</a>). The site adjoins the locally listed Horton Cemetery, however, the 7ha of open space proposed as part of the site will border this heritage asset and separate it from built form.</p>

**Q13.2 Please could the Council respond to the following:**

- a) I understand that the total number of car parking space within Epsom is 2100 spaces. Is this correct? What is the total number of car parking spaces to be lost through the plan period?

13.36 The total number of borough council owned public car parking spaces in Epsom Town Centre is 1795 spaces across 7 council operated car parks. Another 252 spaces are privately operated. This totals 2047 spaces.

13.37 The Local Plan proposes the loss of up to 886 of the council owned public car parking spaces in the Town Centre over the plan period through the redevelopment of Council owned car parks. This information is depicted in the table M11a below:

**Table M11a – loss of parking from council owned town centre car parks**

<b>Car Park Name</b>	<b>Local Plan Site Allocation</b>	<b>Current number of public spaces</b>	<b>Change number of public parking spaces over plan period</b>
Hook Road	SA2 – Hood Road Car Park	530	Loss of 530
Town Hall Car Park	SA5 – Epsom Town Hall	93	Loss of up to 93
Hope Lodge	SA6 – Hope Lodge Car Park	83	Loss of 83
Upper High Street	SA9 – Depot Road and Upper High Street	180	Loss of up to 180
Depot Road	SA9 – Depot Road and Upper High Street	260	No net loss proposed
Ashley Multi Storey Car Park	None	649	No net loss
<b>TOTAL</b>		1795	Loss of up to 886 spaces



**b) Document HB06b advises that the Council holds data on car park usage for car parks it operates and that car park usage surveys were completed in July 2023, but these surveys excluded the three car parks operated by private operators. Is this correct? Which are the three other car parks this statement refers to and are these effected by the site allocations proposed?**

13.38 Yes, that is correct.

13.39 The three car parks excluded are:

- a. Ebbisham Centre NCP (95 spaces)
- b. Epsom High Street NCP (85 spaces)
- c. Rainbow Leisure Centre (operated by the Leisure Centre operator) (72 spaces)

13.40 These three car parks are not affected by the site allocations proposed.

**c) Document HB06b recommends a future parking study to examine overall provision (paragraph 3.67 – 3.72). This is also referred to within the main report (HB06a, paragraph 4.52) has this been done?**

Future parking study (para 3.67)

13.41 No, this work has not been undertaken. However, we do have data for our Council owned car parks on overall provision and individual site provision including the type of provision, and its purpose. This information is set out in response to part h).

13.42 We commit to undertaking this study in the future having regard to Local Transport Plan 4 to assess future demand for parking. This will be delivered in advance of the majority of the car parks being redeveloped, demonstrated by the fact that our local plan trajectory only includes the Town Hall site within the 5-year supply of housing.

Parking Strategy Update (paras 3.68 – 3.70)

13.43 The Epsom parking strategy 2012 has not yet been updated. However, a car parking strategy for Epsom town centre is a corporate priority (Priority 5) for 2025-27 as set out in the Appendix to a report presented to Full Council on 6 May 2025. The Parking Strategy Update will therefore be progressed in due course subject to available resource and sequencing of the Council priorities 2025-27.

13.44 In terms of additional surveys, these were not undertaken in December 2023. The council has continued to monitor usage of its own car parks through ticket sales data which shows that there has not been a substantive increase in

usage as demonstrated by the data in Table M11b below showing annual visitor numbers for each of the car parks with the highest yearly visitors shown in green and the lowest in red.

**Table M11b – Council owned car park annual utilisation (2022/23 – 2024/25)**

Car Park	2022/23	2023/24	2024/25	Car Park Totals	Percentage difference between lowest and highest visitor yearly totals
Ashley Centre	637,096	649,856	664,622	1,951,574	4.3%
Hook Road	79,230	82,649	77,524	239,403	6.6%
Hope Lodge	74,201	73,237	77,174	224,612	5.4%
Town Hall	162,687	152,766	154,211	469,664	6.5%
Depot Road	182,106	170,582	177,471	530,159	6.8%
Upper High St.	71,260	69,635	70,768	211,663	2.3%
Year Totals	1,206,580	1,198,725	1,221,770	3,627,075	1.9%

Explore opportunities to consolidate parking to enable more comprehensive redevelopment on all public parking sites (para 3.71)

- 13.45 All sites with public car parking and that have been promoted as being available for redevelopment through the call for sites process have been assessed as part of the town centre masterplanning process to consolidate parking and enable more comprehensive redevelopment. This is reflected in the recommendations of the Town Centre Masterplan (document reference HBO6a).
- 13.46 Sites such as the NCP car parks detailed above and the Ashley Centre are multistorey car parks that adjoin development schemes which make a valuable contribution towards parking supply in the borough and already make an efficient use of land.

**d) HB06 makes a number of recommendations at paragraph 4.52 – have the Council taken these recommendations into account?**

- 13.47 Para 4.52 states that a future car parking study to examine the overall and individual site provision is needed and as set out above this has not yet been undertaken.
- 13.48 The five bullet points in para 4.52 outline the position that the Masterplan adopted. The table M11c overleaf sets out how the Council has considered these.

**Table M11c – How the Council has considered Town Centre Masterplan Transport recommendations**

Masterplan position	EEBC Response
Under-utilised car parks should be considered for redevelopment to regenerate the town centre with equal or more valuable uses including new homes.	Yes, those car parks where there is evidence that they are underutilised have been promoted through the Local Plan process and incorporated into the Local Plan as site allocations for housing.
Wherever possible, lost parking spaces should be re-provided, at least in part, as part of any redevelopment scheme.	Yes. The parking survey data identifies that there is currently significant surplus parking capacity across the town centre car parks that could absorb some increase in demand. There are also different solutions to increase public car parking should it be deemed necessary ahead of the loss of any of the allocated car parks. The local plan allocations therefore do not require replacement public car parking on these sites, however that does not mean that some public car parking could not be provided as part of a redevelopment scheme.
Smart technology should be used to enable multiple users to use the same parking spaces throughout the 24-hour period.	<p>Yes. The Council currently operates a system whereby residents within 300m of some of its car parks can purchase permits to park in Council owned car parks in an evening making effective 24-hour use. The same can therefore be achieved without the introduction of costly smart technology.</p> <p>The use of smart technology could be considered within any of the car park redevelopment schemes to enable resident parking to be multi use.</p>
Changes are only proposed for council owned car parks	Yes. Only council owned car parks have been promoted for redevelopment through the Local Plan process and subsequently allocated for housing development.
Popular car parks serving the retail core of the town centre should be retained	Yes. The retail core is best served by the Ashley Centre and Ebbisham Centre Car

	<p>parks, and the Council is not proposing any changes to these.</p> <p>Blue badge parking for the town is located at the Town Hall Car park. An element of blue badge parking could be retained as part of any redevelopment of this site.</p>
--	---

**e) For the car parks listed at paragraph 3.59 of HB06b, please could the Council identify if there is a corresponding site allocation number associated with the car park identified?**

13.49 The Table M11d below identifies the car parks that were surveyed and those with a Local Plan site allocation:

**Table M11d – car parks surveyed on local plan allocation (if applicable)**

<b>Car Park Name / Location</b>	<b>Local Plan Site Allocation reference</b>
Ashley Centre	n/a
Hook Road	SA2 – Hook Road Car Park
Town Hall Rear	SA5 – Epsom Town Hall
Hope Lodge	SA6 – Hope Lodge Car Park
Upper High Street	SA9 – Upper High Street and Depot Road
Depot Road	SA9 – Upper High Street and Depot Road
Rainbow Centre	n/a
Ebbisham Centre NCP	n/a
Epsom High Street NCP	n/a

**f) How have the Council considered any implications of the removal of the car park for Epsom Town Centre?**

13.50 The Council has considered the role each car park plays in terms of serving the town centre, along with usage data obtained via surveys and ongoing monitoring. The survey work concludes that there is a significant amount of capacity across the town centre car parks when assessed cumulatively, with some sites achieving lower ‘peak utilisation’ levels than others, as shown in the Town Centre Masterplan Appendices (document reference HB06b) and the Town Centre Car Park Use Study submitted as part of our response to the Stage 1 MIQs (see Appendix M1f of document reference [COUD\\_005a](#)).

13.51 To provide more context. Not all the car parks being lost directly support the vitality and viability of the town centre. The table M11e below sets out the role each plays and why the Council has drawn the conclusions it has based on information it currently holds:

**Table M11e – The role of Town Centre Car Parks**

<b>Car Park</b>	<b>Type</b>	<b>Function/Role</b>	<b>Commentary</b>
Hook Road	Long Stay	Storage for 100 vehicles on level 5 100 EEBC staff permits 100 Business season card holders	The storage of vehicles is necessary here and occurs due to surplus capacity. This is where EEBC staff park for work which is subject to Local Government Reorganisation and the location of the workforce is likely to change.
Town Hall	Short Stay	Serves core retail centre	Even if both car parks were fully utilised each and every day (176 spaces), the availability from spaces not currently utilised at the Ashley Centre Car park (c 250 spaces) is adequate to meet current demand.
Hope Lodge	Short Stay	Serves core retail centre	
Ashley Centre Car Park	Short Stay	Serves core retail centre	With 649 spaces open to the public every day and 130 additional spaces which are used by businesses during the week becoming available at weekends. Based on usage data there is about 250 spaces available each day.
Ebbisham Centre NCP	Short Stay	Serves core retail centre	These car parks are not fully utilised, and availability can also offset any loss at Hope Lodge and Town Hall car parks.
Epsom High street NCP	Short Stay	Serves core retail centre	
Depot Road	Long stay	Serves the upper end of the town e.g. Cinemas	With up to 180 spaces being lost, 260 would remain. The 2023 surveys showed a usage of 316 spaces combined. Overall, a small reduction in long stay spaces serving the upper end of town.
Upper High Street	Long stay	Serves the upper end of the town e.g. Cinemas	

13.52 The above high-level analysis of the data the Council currently holds has informed the Local Plan.

13.53 Although up to 886 parking spaces would be lost via development of some car parks, this development would also create about 1,100 new homes right in the centre of Epsom bringing additional consumers all within walking distance of the town centre.

- 13.54 The Council is satisfied that the removal of some surface car level parking will make a significant contribution towards the delivery of sustainable development and making efficient use of previously development land, whilst balancing the needs of town centre businesses.

**g) The Council have referred to a car park assessment being undertaken as part of the Town Centre Masterplan document – does this document form part of the evidence base? this report is referenced within Section 3 of HB06b. Can the Council provide a copy of this document and set out clearly which car parks (site allocations it covered)?**

- 13.55 The Town Centre Car Park usage study has been submitted as part of our response to the Stage 1 MIQs (see Appendix M1f in document reference COUD 005a).

- 13.56 It covered the car parks detailed in Table M11f below:

**Table M11f – car parks assessed in 2023 survey and town centre allocations**

<b>Car Park Name / Location</b>	<b>Local Plan Site Allocation reference</b>
Ashley Centre	n/a
Hook Road	SA2 – Hook Road Car Park
Town Hall Rear	SA5 – Epsom Town Hall
Hope Lodge	SA6 – Hope Lodge Car Park
Upper High Street	SA9 – Upper High Street and Depot Road
Depot Road	SA9 – Upper High Street and Depot Road
Rainbow Centre	n/a
Ebbisham Centre NCP	n/a
Epsom High Street NCP	n/a

**h) How have the Council considered any implications of the removal of the car parking for those sites within Epsom town centre in terms of the vitality and viability of this centre? This is particularly pertinent given the findings of the retail study, EV01, which refers to offering discounted car parking to encourage dwell times.**

- 13.57 Yes, please refer to the Council response to question f).
- 13.58 In addition, no representations have been received during the preparation of the Local Plan which sets out concern or evidences any likely negative impact the loss of parking would have on Epsom Town Centre.
- 13.59 High parking charges are seen as a greater barrier to accessing Epsom Town Centre and there is evidence of this each year when the Council reviews its car parking fees and charges. However, this is not a planning consideration,

and the charges set by the Council take into account others factors including Council income and budgets. The Council does consider the impacts of its parking charges on the vitality and viability of the town centre and this can be evidenced via its Committee reports. Relevant examples include:

- a. [Environment and Safe Communities Committee January 2022](#) – Made references to the cost of living increasing and visitor numbers to some car parks impacted, there is a need to be mindful of the potential impact of increasing car park charges across the board. Given that some car parks have continued to be well used, it is proposed that the car park increases are concentrated on those Epsom car parks that are still being well used. The charges for other car parks in Epsom, which are primarily used for longer retail visits and by local businesses will remain the unchanged.
- b. [Environment Committee January 2024](#) – made reference to an increase in the up to 1 and up to 2 hour stays in the Ashley Centre car park. The ‘up to 1 hour’ fee has not increased for four years and by bringing the ‘up to 2 hour’ closer to the ‘up to 3 hour’ it may encourage longer dwell time in the Centre and surrounding establishments.

13.60 The Council commits to undertaking a study to investigate the impacts of loss of parking on the economic vitality of the town centre as well as the benefits of housing development and increasing the population of the town.

**i) There also appears to be a variance of approach in terms of referencing replacement car parking on some but not all of the sites. What evidence has been used to inform the approach taken? Where allocations refer to replacement of sufficient car parking is it clear what this would mean in practice?**

13.61 The only allocation to refer to public parking provision is site allocation SA9 which requires the provision of a decked public car park. This is in response to a Council made suggestion during the preparation of the Masterplan that a future car parking strategy could consider decking at its remaining car parks. This will be considered as part of a wider strategy along with other methods to increase parking provision should the future parking study demonstrate it is required. However, there is no evidence that demonstrates a decked car park as part of SA9 is required to either support the housing development as part of that allocation or any other Town Centre Developments.

13.62 The evidence relied upon has been set out within the Council’s responses to the other parking questions above.

13.63 It is important to note that parking to service the residential and commercial development detailed in the site allocations and any future windfall developments will need to satisfy the parking standards detailed in Appendix 4 of the Local Plan.

**j) Concerns have been raised regarding the effect on existing controlled parking zones (CPZ). Please could the Council provide a map which plots the site allocations relative to the existing CPZ and outlines the parking restrictions which are applicable to these zones**

13.64 A map showing the site allocations relative to the existing CPZs is contained in Appendix M11a. The map shows the locations of the CPZ relative to the site allocations and provides details of the restrictions in place. Further details on parking restrictions in the borough can be accessed on the Interactive Parking Restrictions Map hosted by Surrey County Council - [Parking Restrictions - Epsom and Ewell](#).

**k) In terms of sites SA5/SA6/SA9 – are the density/capacity figures correct? Representations indicate that replacement parking is to be provided at the Depot road site – is this correct?**

13.65 No, it is not correct that replacement parking is to be provided.

13.66 SA5 – Epsom Town Hall – The approximate capacity of this site is correct and has been informed by the Town Centre Masterplan (document reference [HB06a](#)). The design has regard to the conservation areas and listed buildings located in close proximity to the site. No replacement public car parking is currently being required. However, it would be of benefit for some public blue badge spaces to be provided as part of any redevelopment of this site.

13.67 SA6 – Hope Lodge Car Park – The approximate capacity of this site is correct and has been informed by the Town Centre Masterplan (document reference [HB06a](#)) which identifies that setting of the Grade II listed hope lodge car park that adjoins the site. No replacement public car parking is being required.

13.68 SA9 – Depot Road and Upper High Street Car Park- The approximate capacity of this site is correct and has been informed by the Town Centre Masterplan (document reference [HB06a](#)). The proposal is to redevelop the Upper High Street Car park for residential use (up to 100 dwellings) and retain the Depot Road Car Park site for parking which could be considered for decking as part of the future parking strategy.

### **Site SA35 Horton Farm**

**Q13.3 Is the Plan clear regarding what infrastructure would be necessary to support this allocation?**

13.69 Yes. Policy SA35 clearly sets out the infrastructure requirements of the site.

13.70 The site will deliver a range of infrastructure, including:



- a) Appropriate vehicle, pedestrian and cycle access to the site and enable the site to be served by public transport to include the provision of appropriate bus priority, and other passenger transport facilities.
- b) A community building, capable of accommodating early years education provision and other community uses – subject to the needs of the locality.
- c) Additional primary care capacity required to serve local needs. This could take the form of on-site provision or an equivalent financial contribution towards off-site provision of new or improvement to existing health facilities.
- d) A public park of approximately 7ha within the land to the north of the site incorporating walking, cycling routes, equestrian routes and measures for surface water management and biodiversity enhancement.
- e) Sustainable drainage measures to address and mitigate the risk of surface water flooding

**Q13.4 In what way does the site take into account the sustainability goals of the Council as identified within the Vision, pages 15 and 16 of the Plan?**

13.71 Whilst the sustainability (as defined by Chapter 2 of the NPPF) goals of the Council as identified in the Vision, pages 15 and 16 of the Plan are not explicitly stated as sustainability goals, they can be drawn out and summarised as follows:

- a) To provide a high quality of life (from the social pillar of sustainability to consider the needs of future generations)
- b) To provide a range of housing to accommodate a diverse and changing population (to accommodate the needs of the present without compromising the needs of future generation again, from a social perspective)
- c) To concentrate development on urban sites, particularly in the town centre and undeveloped transport hubs (from a sustainability perspective, to avoid sprawl and reduce the need for travel unsustainably).
- d) To supports economic development (another key pillar of sustainability,) e.g. through the maintaining the vibrancy of the town centre.
- e) To encourage a modal shift in the way people travel (e.g. through walking and cycling) to encourage healthy living and reduce carbon emissions.
- f) To improve biodiversity, and therefore impact on the environment from carbon reduction, urban cooling and flood mitigation.

13.72 With this in mind SA35 takes in the sustainability goals as follows:

Housing, community facilities and traveller pitches.

13.73 The site will make a significant contribution to the borough's housing and traveller needs and therefore contribute to the social dimension of sustainable development. The contribution to this pillar will be further augmented by a community building capable of providing early years education and other community uses, primary care capacity or an equivalent financial contribution to existing health facilities, and children's play facilities.

### Sustainable location

- 13.74 Whilst the site is not contained within the urban envelope, out of all of the major allocations outside of the urban envelope, it is in the most sustainable. From a spatial perspective, it is nearer to the more developed part of the borough, utilising existing infrastructure and within reasonable distance of nearby amenities including a primary school and local centre. This aligns with the environmental pillar of sustainability.

### Sustainable transport infrastructure

- 13.75 The site will provide vehicle, pedestrian and cycle access to the site and enable it to be served by public transport. This will meet the environmental, social and economic pillars of sustainable development insofar as it will mitigate carbon emissions, improve people's health and wellbeing and keep people economically active for longer.
- 13.76 Site Allocation SA35 can be served by public transport, with bus services operating near the site. This demonstrated by the Transport Assessment Regulation 18 (Document Reference: [IS06](#)) which assessed the site in terms of mobility and accessibility to various services and amenities. The document explains that public transport time includes the walk to bus stop or train station, a public transport travel time as timetabled, plus the walk from the alighting stop to the amenity. Further details on bus services are detailed below in Table M11g:

<b>Table M11g – Public Transport Analysis of Allocation SA35</b>		
<b>Site</b>	<b>MCS Score (out of 25.5)</b>	<b>Bus services</b>
SA35 Horton Farm	17.5	<p>The E9 service travels around the site and could be diverted to serve it (as set out in our 14 January 2025 meeting with SCC – Document Reference COUD-005a, Appendix M1b, page 4).</p> <p>In addition, the E5 service operates along Hook Road which borders the site.</p>

### Green Infrastructure

- 13.77 As well as providing a park of approximately 7ha a legal mechanism will be established for the long-term management of Green and Blue Infrastructure, retain and protect trees and hedgerows. The green infrastructure within the site will provide connections by sustainable transport modes between the current

urban built up area adjoining the site to Horton Country Park. We consider that this will make a significant contribution to the environmental pillar of sustainability.

#### Biodiversity Net Gain

13.78 The allocation requires 20% net gain in biodiversity, which will improve the environmental pillar from this perspective.

#### Flood Mitigation Measures

13.79 Within the site development will be located away from areas of surface water flood risk and sustainable drainage measures will be incorporated to mitigate against the risk of future flooding. This contributes to the environmental pillar of sustainability.

**Q13.5 The representation on behalf of The Church Commissioners for England (representation 155) refers to the preparation of the Statement of Common Ground with the Council in relation to the deliverability of this site. The Inspector would be grateful if this could be prepared and submitted with the MIQ responses. This should look to cover, but not limited to, site capacity, including reference to the affordable housing and gypsy and traveller provision, any known constraints, infrastructure requirements, ecology and flood risk, phasing, whether the requirements of policy S15 to achieve 20% biodiversity net gain is achievable as well as a clear indication of the likely land uses envisaged here.**

13.80 A Statement of Common Ground has been agreed by the Council and The Church Commissioners for England (CCE). This was submitted alongside the Council's responses to the Matter 1 MIQs (document reference: COUD\_004).

**Q13.6 The above representation makes a number of suggested changes to the policy wording. What is the Council's view on these?**

13.81 Appendix 2 within the Council's Statement of Common Ground with The Church Commissioners for England (CCE) (document reference: COUD\_004) sets out a table of amendments to the Proposed Submission Local Plan proposed by CCE, along with a response by the Council.

**Q13.7 Should the policy wording make reference to ordinary watercourses?**

13.82 There are no ordinary watercourses, as defined by the Environment Agency, that run through the site. It is therefore considered unnecessary to refer to ordinary watercourses within the policy.

## Site SA34 Hook Road Arena

### **Q13.8 In what way has the proposed mix of facilities been informed by the evidence base and in particular documents IS07 and IS08?**

- 13.83 The needs for new facilities are identified for the borough within the Playing Pitch Strategy (2021) (document reference IS07) and Sports Facilities Assessment (2020) (document reference IS08).
- 13.84 The Playing Pitch Strategy concluded that for all the assessed sports, there are not enough accessible pitches with secure community use to meet both current and future demand. The absence of community use agreements is a significant issue in the borough given that needs to be addressed. For many of the sports it appears that securing such agreements could help meet current needs through reducing uncertainty. However, additional pitch provision, particularly for football, will be needed to meet future needs.
- 13.85 The Sports Facilities Assessment identified a small shortfall in capacity for sports halls (gymnastics and indoor netball), swimming pools and outdoor court space for netball.
- 13.86 Site SA34 is Council owned and therefore community use of the sporting provision on the site can be secured, which is a significant benefit. Securing an allocation within the Local Plan is an important step in the process. The policy has been written to maintain flexibility as the Council recognises that the needs identified in IS07 and IS08 may have evolved and intends to work with the sporting bodies when the site comes forward, to identify the most appropriate provision. Sport England are supportive of the policy and the intended approach, as evidenced through their Regulation 19 representation.

### **Q13.9 Representations refer to concerns regarding the reduction in the number of dwellings the site can accommodate from 150 to 100. What is the justification for this and are these concerns valid?**

- 13.87 Following review of the allocation policy after the Regulation 18 consultation, greater attention was paid to the overall mix of housing the plan would deliver and surface water flood risk (following the updated SFRA). It was recognised that due to the size, shape and constraints of the site 150 dwellings would most likely result in a scheme of apartments and would be unlikely to yield and family housing, for which the HEDNA had identified a more proportional need and due to existing land use values are difficult to deliver on sites in the urban area.
- 13.88 It would also make it more difficult to avoid areas of surface water flooding. By reducing the number to a *minimum* of 100 (which leaves the possibility open for more should a robust design solution be realised) the policy now strikes a balance between overcommitting to an unrealistic number of dwellings that would meet need and allowing more flexibility for an innovative design solution that would avoid the areas at risk of surface water flooding.

## **Sites SA31 Land at West Park Hospital (South) and SA32 Land at West Park Hospital (North)**

### **Q13.10 Should the policy wording of sites SA31 and SA32 make reference to ordinary watercourses?**

- 13.89 There are no ordinary watercourses, as defined by the Environment Agency, that run through the site. It is therefore considered unnecessary to refer to ordinary watercourses within the policy.

## **Site SA33 Land at Chantilly Way**

### **Q13.11 Should the capacity be described as a minimum?**

- 13.90 The policy reads that the site is “Allocated for: Approximately 30 dwellings (C3)”. This expression is consistent with other site allocation policies in the plan. We do not consider that the figure needs to be expressed as a minimum as the word “approximately” allows discretion based on the particulars of the forthcoming planning application, which would also need to have regard to policy S11 (Design) and associated minimum density guidance.

### **Q13.12 Are the references to the Grade II Listed Horton Farm House justified?**

- 13.91 Yes, Horton Farmhouse was considered as part of the Heritage Impact Assessment for the site (see pages 67-68 of document reference TP06). Whilst it is outside the boundary of the site there is a possibility that views of buildings may impact on the setting of the listed building, which is in the Southwest corner of the Horton Farm site.
- 13.92 The policy is worded in such a way that as a minimum it requires the setting to of the Listed Building to be conserved, which will trigger consideration of this matter in any forthcoming planning application. It is not considered so onerous a requirement as to stop development coming forward. For the policy to be silent on the impact of the setting of the Grade II Listed Building would, in our view, not meet the objective of avoiding or minimising conflict between any asset’s conservation and any aspect of the proposal, contrary to advice set out in Historic England Advice Note 3 and paragraph 203 of the NPPF (December 2023).

## Site SA2 Hook Road Car Park

**Q13.13 The landowner has identified that they are keen to see the site developed with SA1. Has any work been completed to ascertain whether this is a feasible objective?**

- 13.93 EEBC have been working closely with Zenith Land since February 2023 when Zenith completed their purchase of site allocation SA1 from Southern Gas Networks (SGN).
- 13.94 EEBC and Zenith Land agreed a partnership approach to master planning SA1 and SA2. On the 19 June 2024, the [Councils Strategy & Resources Committee](#) gave approval for EEBC to enter into a mutual deed of easement with Zenith Land to facilitate, through potential redevelopment, the enhancement of future public realm and connectivity across both sites.
- 13.95 In practical terms, the deed of easement allowed Zenith land to adopt a main entrance to SA1 from East Street – utilising the EEBC’s Rainbow Leisure Centre private access road. By removing the need for separate, duplicated road infrastructure serving each site, the combined site could be designed to maximise open space and connectivity. This collaborative approach assisted Zenith Land to successfully receive planning consent in April 2025 for site allocation SA1.
- 13.96 Both parties are committed to progressing the combined remediation of sites SA1 and SA2 as soon as Zenith Land’s proposed scheme for SA2 Hook Road Car Park is submitted and received planning approval (anticipated 2026).
- 13.97 The financial viability of the scheme i.e. the ultimate factor for the scheme’s feasibility, is dependent on the mix of affordable housing, parking provision and land decontamination costs.
- 13.98 Confidence that a combined SA1 and SA2 site redevelopment is a feasible objective, can be evidenced by the following:
- a) Zenith’s proposed scheme for SA2 is fully worked up (including a 3d printed scaled model of SA1 & SA2 exhibited as part of the public consultation proposals for SA1). Zenith has prepared a 145-unit scheme design and a preliminary set of build costs to support the proposed SA2 redevelopment.
  - b) EEBC commissioned and completed a geotechnical survey to establish the levels of potential historic contamination. This confirmed that SA2 Hook Road Car Park is sited on heavily contaminated land which is best remediated together with SA1 to reduce development costs.

- c) Committee approval for the above ground investigation survey and in principle agreement to release SA2 Hook Road Car Park for redevelopment was secured at [Strategy & Resources Committee on 23 July 2024](#).
- d) Strategy & Resources approved a budget of £150,000 on [12 November 2024](#) to cover the initial costs of the appraisal and feasibility work to ensure the Council complies with its statutory obligation to evidence Best Value. This work is expected to be completed by year end 2025, with a view to obtaining committee / full council approval in Spring 2026 to progress the decommissioning of the car park and submission of a planning application for its redevelopment.

### Site SA19 7 Station Approach

#### **Q13.14 How has the site capacity been arrived at?**

- 13.99 The site capacity was based on early pre-application discussions by the new site owner to progress a lower density scheme following the refusal of a higher density scheme. The councils site capacity of an approximate net gain of 5 dwellings (or 6 units gross) was based on a scheme respecting the surrounding character whilst still making efficient use of land. The capacity assigned would equate to a development density of 125 dwellings per hectare based on a site area of 0.04ha, a significant uplift from the prevailing density in the local area.
- 13.100 Since the plan was produced a planning application has been submitted for the redevelopment of the site (ref: 25/00404/FUL) for 9 units (gross) or 8 units (net). The application is awaiting determination.

### Site SA11 Finachem House, 2-4 Ashley Road

#### **Q13.15 How has the capacity of the site at 20 dwellings been arrived at and what evidence is there to support the position that 20 dwellings would make efficient use of land in line with policy S11?**

- 13.101 The site was originally promoted for 42 units at 8 storeys. However, it has been considered that 8 storeys would be inappropriate because it is adjacent to Ashley House, which is a Grade II\* Listed Building. The site capacity of 21 dwellings (half of that proposed) is considered to be an appropriate compromise that balances the need to provide additional housing with protecting the boroughs heritage assets. The Heritage Impact Assessment for the site (pages 37-38) of [document reference TP06](#) identifies that *'Development of the site could impact on the setting of the Grade II Listed Ashley House which will need to be considered through the design of any future development'*.

## **SA21 Richard Field Car Park**

### **Q13.16 Concerns have been expressed regarding the loss of the car park. Are these concerns justified?**

13.102 No, the Council has monitored the use of this 30-space public car park (which is free to use – subject to restrictions on the length of stay unless a permit is held). The most recent survey data indicates that the site is not used to its capacity with peak utilisation being recorded at 10:00 on Wednesday 9 April 2025 with 17 spaces being used (57%) and the lowest utilisation being recorded on the Wednesday 16 April 2025 with 7 spaces being used (utilisation of 23.3%).

13.103 It is therefore considered appropriate to redevelop the site for residential use of approximately 7 units, which could include some retained public parking dependent upon the final design of the scheme.

## **SA22 Etwelle House, Station Road**

### **Q13.17 Does any part of the site include heritage assets and if so should this be reflected in the policy wording?**

13.104 There are no heritage assets within or surrounding the site.

## **SA24 Garages at Somerset Close & Westmoreland Close**

### **Q13.18 Concerns have been expressed by the landowner regarding the delivery of the dwellings proposed, are these concerns valid?**

13.105 These concerns are valid. Upon further engagement with the landowner (Town & Country Housing) it is apparent that the site is not likely to be delivered within 5 years. While they are supportive of the proposed allocation, they acknowledge that it will be difficult to overcome the previous reasons for refusal (notably loss of parking).

13.106 The site may be developable over the long term of the plan, but it is not currently deliverable. To prevent double counting with the larger windfall projections in the Local Plan that apply beyond year 6 onwards, it is suggested that this allocation is removed from the Local Plan.

## **SA27 22-24 Dorking Road**

### **Q13.19 Is there any planning history of relevance here which would indicate whether the site is developable?**

13.107 Yes, the planning application indicating that the site is developable can be found under planning reference: 19/01365/FUL.

13.108 While this application was refused at Committee and at a subsequently appeal, it indicated the intention to develop the site for 20 residential units (gross).



13.109 However, given conversations with the landowner in May 2025, it is clear that the site may be difficult to bring forward at this density. The landowners are now considering a single apartment block of 14 dwellings (12 net dwellings and that they will continue to develop their plans in preparation for an application or pre-app to discuss principle further.

**Q13.20 Would the development be deliverable at the scale envisaged by the Council given the nearby heritage assets and what evidence is there to support the Council's position on this?**

13.110 While the Council acknowledges the nearby Listed Buildings (see p.57-58 of the Heritage Topic Paper, document reference TP06), located across Dorking Road, and that design of a scheme will need to consider the impact on these heritage assets, the *'degree to which the assets identified will be impacted is not considered significant'*.

13.111 As noted above in response to Q13.19, the landowners are now considering a single apartment block which will deliver less dwellings than currently set out in the allocation, whilst still making efficient use of land.

**Q13.21 What is the density envisaged on this site and how has this been calculated?**

13.112 The density on this parcel is calculated as 165dph (based on 18 net dwellings) and the Council considered that a higher density scheme could be promoted on this given its location on an A road and the previous planning history.

13.113 As noted above, the site owner is currently progressing a lower density scheme for 12 dwellings in this sustainable location, which equates to approximately 100dph.