

Consultation Summary

Post Hearing Consultation on Additional Documents Submitted by the Council

June 2026



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Introduction

1.1. As part of the Local Plan examination stage a non-statutory five-week public consultation was held between Monday 11 May and Monday 15 June 2026 on documents submitted to the Inspector since 8 October 2025. The documents that were subject to consultation are listed below:

COUD_020 - Assessment of Urban Sites

COUD_021 - Green Belt Topic Paper additional work

COUD_029 - Additional Sites for Potential Allocation document

COUD_030 - Sustainability Appraisal (SA) Report Addendum

COUD_031 - Habitats Regulations Assessment (HRA) Addendum

COUD_032 - Infrastructure Delivery Plan (IDP) Addendum

COUD_033a - Transport Assessment Addendum

COUD_033b - Transport Assessment Technical Annex

1.2. These documents relate to additional sites that could potentially be allocated through main modifications to the Local Plan following this consultation.

1.3. This document provides a high-level summary of the responses received to the consultation and does not provide details of all the comments received.

2. Engagement

- 2.1. This non statutory consultation was undertaken in line with Epsom and Ewell borough Council's [Statement of Community Involvement \(SCI\)](#). This included consultation with neighbouring Local Planning Authorities, and residents or persons carrying on business in the Local Planning Authority's area and also included those people that had signed up to receive email alerts about the Local Plan on the Council's consultation database. Individuals were invited to make representations on the Post Hearing Consultation on additional documents submitted by the Council. Specific and general consultation bodies were also consulted.

3. Post Hearing Non-Statutory Consultation

- 3.1. During the consultation, the consultation documents could be accessed on the Council's [Examination webpage](#) and [consultation platform](#).
- 3.2. Planning Officers also made themselves available during the consultation period to discuss the Consultation material in person or at the Town Hall or over the phone.
- 3.3. For the duration of the consultation the following consultation documents were available to view as paper copies at the libraries within the borough and Town Hall during opening hours:
 - COUD_020 - Assessment of Urban Sites
 - COUD_021 - Green Belt Topic Paper additional work
 - COUD_029 - Additional Sites for Potential Allocation document
 - COUD_030 - Sustainability Appraisal (SA) Report Addendum
 - COUD_031 - Habitats Regulations Assessment (HRA) Addendum
 - COUD_032 - Infrastructure Delivery Plan (IDP) Addendum
 - COUD_033a - Transport Assessment Addendum
 - COUD_033b - Transport Assessment Technical Annex
- 3.4. To support members of the public to make their representations, the following documents were also made available as paper copies at the libraries and Epsom Town Hall:
 - Response Forms
 - Consultation on Additional Documents FAQs
- 3.5. As the consultation documents were available electronically and as reference paper copies at libraries and the Town Hall, individual hard copies of the Local Plan were provided where these were requested subject to printing, postage and packaging costs.

4. Publicising the consultation

- 4.1. The methods and processes utilised in bringing the non-statutory consultation on additional documents submitted by the Council to the attention of all of those wishing to provide their representation included:
- The [Local Plan Consultation platform](#), including a recorded webinar, which was accessible throughout the consultation period. The 17-minute webinar covered key information about the consultation.
 - Council Website pages: the planning policy webpages and the council's consultations page.
 - Social media.
 - Traditional media: a formal notice placed in the Surrey Comet on the 14 May 2026.
 - Media releases during the consultation period. A [media briefing note](#) was published on the Epsom and Ewell Council Website on the 11 May 2026.
 - Leaflets and posters were displayed and provided at locations of interest, such as the town hall, borough notice boards, community centres and libraries.
- 4.2. Appendix 2 contains examples of the consultation materials referred to above.
- 4.3. Formal notification letters and emails were sent to all stakeholders (individuals and organisations) who had registered for updates on EEBC's Local Plan on the planning policy consultation database, including those who had responded to the previous Regulation 18 and Regulation 19 consultations.

5. Consultation Responses

- 5.1. The Council received duly made responses from a total of 346 respondents, which included comments from statutory/government and general consultees, in addition to individuals, businesses and organisations across the Borough. The representations were submitted by email or post.
- 5.2. Of the 346 respondents, we estimate the following numbers commented on each of the eight documents:
 - 68 respondents commented on ‘COUD_020 – Assessment of Urban Sites’
 - 244 respondents commented on ‘COUD_021 - Green Belt Topic Paper – Additional Work’
 - 245 respondents commented on ‘COUD_029 – Additional Sites for potential allocation’
 - 164 respondents commented on ‘COUD_030 – Sustainability Appraisal Report Addendum’
 - 68 respondents commented on ‘COUD_031 – Habitats Regulation Assessment – Addendum’
 - 116 respondents commented on ‘COUD_032 – Infrastructure Delivery Plan – Addendum’
 - 161 respondents commented on ‘COUD_033a – Transport Assessment – Addendum’
 - 75 respondents commented on ‘COUD_033b - Transport Assessment Technical Annex’
- 5.3. These estimates are based primarily on respondents’ self-identification (i.e. ticking the relevant document boxes). The figures may therefore overstate engagement where respondents selected documents but did not provide substantive comments on them. In a smaller number of cases, where the document being commented on was not stated, we have identified the relevant document(s) from the content of the responses.
- 5.4. As part of the consultation, respondents were asked if they wished to participate in the examination hearing session to be held following the consultation on the 2 July 2026.
- 5.5. All responses to the non-statutory consultation can be viewed in full on our [examination webpage](#) in the examination library under [Post Hearing Consultation Representations](#) .
- 5.6. In addition to comments on the documents that were subject to consultation, comments were also received other matters including:
 - Sites contained within the Submitted Local Plan
 - The consultation and whether it was being undertaken in accordance with the Councils constitution
 - Availability of documents in libraries and town hall during the consultation period.

Appendix 1 - Summary of responses

Statutory Consultee organisation responses

The following summarises representations received during the non-statutory consultation from those bodies prescribed for the purposes of [section 33a\(1\)\(c\) of the Act](#) and as set out under Regulation 4 of the [Town and Country Planning England \(Local Planning\)\(England\) Regulations 2012](#).

Environment Agency (Rep 115)

Summary of Comment:

The Environment Agency raises no objection in principle to the additional allocations and supports the sequential approach, noting that none of the sites are within Flood Zones 2 or 3, within 20 metres of a main river, or within modelled climate change flood extents. It advises that allocations should continue to be informed by up-to-date environmental evidence, including flood risk, groundwater and catchment data, and notes that other sources of flooding, including surface water, must also be considered. It highlights that a number of sites fall within Groundwater Source Protection Zones, including some within SPZ1, and that some may have potentially contaminative existing or former uses, requiring appropriate assessment and mitigation to ensure no unacceptable risk to groundwater.

The Environment Agency also reiterates the national drainage hierarchy, with connection to the public sewer as the preferred option and advises that any non-mains drainage proposals would need to be justified and supported by sufficient technical evidence, including a Foul Drainage Assessment where relevant. It also notes that these comments should be read alongside its previous response of 17 March 2023.

EEBC Response:

The Environment Agency's comments are welcomed. The EA confirms that the proposed allocations follow the sequential approach to flood risk and will continue to use the latest environmental evidence in plan-making and decision-taking. Site-specific matters relating to groundwater protection, contamination, surface water and foul drainage will be addressed through Local Plan policy requirements and, where necessary, at planning application stage, having regard to both this and the Environment Agency's previous representation.

Historic England (Rep 241)

Summary of Comment:

Historic England confirms that it has no comments on the additional documents prepared for the Epsom & Ewell Local Plan Examination.

EEBC Response:

Noted.

National Highways (Rep 64)

Summary of Comment:

National Highways notes that the additional homes associated with the additional potential sites for allocation reflect almost a quarter increase on the number of homes in the submitted Local Plan, and that the additional trip-making results in a significantly greater but still relatively modest impact on the Strategic Road Network compared to the submitted Local Plan. Accordingly, National Highways does not have any significant concerns in relation to the impact of the total development considered in this new assessment.

Response:

National Highways' confirmation that it has no significant concerns regarding the impact of the total development considered in the new assessment on the Strategic Road Network is welcomed.

Sport England (Rep 251)

Summary of Comment:

Sport England is concerned about the potential new site allocation for Land at Priest Hill, Ewell (NON013) and considers that the land constitutes playing field land as defined in the 2015 Development Management Procedure Order, with the site clearly in use as sports pitches and other areas potentially also supporting training and informal activity. It advises that none of the exceptions in its playing fields policy apply in this case, that no replacement provision is planned, and that any allocation would not be in accordance with paragraph 104 of the NPPF which protects existing playing fields from being built upon.

Sport England also notes that no reference is made to the Epsom and Ewell Borough Playing Pitch Strategy (August 2021), which identifies the site as being used by Sutton and Epsom RFC and highlights that it contributes to meeting demand for community rugby through 3 pitches plus junior and mini rugby

Response:

Sport England's objection in relation to the potential allocation of Land at Priest Hill, Ewell (NON013) is acknowledged, along with the concerns regarding the loss of playing field land, the role of the site in meeting community rugby demand.

The Council has produced a position statement which clarifies how the two sports clubs that lease the land (document reference [COUD_024](#)) that clarifies the position of the two sports clubs that lease different parts of the site.

pitches. It does not consider that the evidence base supports the loss of the site as playing field or its potential re-allocation for housing, and therefore objects to the potential new allocation unless suitable replacement provision can be allocated to mitigate the loss of playing field in this location.

Surrey County Council (Rep 36)

Summary of Comment:

Surrey County Council (SCC) notes that its officers have been actively involved in the production of the Transport Assessment Addendum and have also contributed to the IDP Addendum. Detailed discussions have also taken place with SCC as Lead Local Flood Authority. SCC makes one correction to the consultation documents, namely that on page 36 of the Transport Assessment Addendum ([COUD_033a](#)) the frequency of the TfL 166 bus service is hourly at this location, not three times per hour, and advises that improved frequency should therefore also be sought together with the recommendation to connect the 166 service directly to the Downs Farm site (ref: NON016).

SCC also makes minor comments on the Heritage Assessment within the Additional Sites for Potential Allocation document ([COUD_029](#)), noting that TOW041 (Laine Theatre Arts) appears to have been missed from the Areas of High Archaeological Potential (AHAP), that there is some inconsistency in reporting AHAP designations across the wider document suite, and that HOR004 (Land off Cuddington Glade), NON013 (Land at Priest Hill / NESLOT Sports Ground) and NON016 (Downs Farm) will require the same archaeological provisions for assessment and possible evaluation as if they were within AHAPs, as they are over 0.4ha in size.

Response:

Surrey County Council's continued engagement in the preparation of the evidence base is welcomed and the points raised in relation to the reported frequency of the 166 bus service.

Thames Water (Rep 243)

Summary of Comment:

Provide high level details on the likely water and wastewater infrastructure requirements for the additional sites for potential allocation.

Downs Farm (NON016) has been identified as a site where, on the information provided, modelling will be required and it is anticipated that upgrades to the waste network will be necessary.

They do not envisage infrastructure concerns on the rest of the sites.

Response:

Thames Water's review of the additional sites and its high-level assessment of potential water supply and wastewater infrastructure requirements is welcomed.

Thames Water's identification of Downs Farm (NON016) as requiring further modelling, with potential upgrades to the wastewater network anticipated is noted, and the Council will continue to engage with Thames Water to better understand the scope and phasing of any infrastructure requirements.

It is also noted that Thames Water does not envisage infrastructure constraints in relation to the remaining sites at this stage.

Should any additional sites be progressed through modifications to the Submission Local Plan, the Council will continue to work proactively with infrastructure providers to ensure that necessary water and wastewater infrastructure is delivered in a timely manner to support development.

Elmbridge Borough Council (Rep 135)

Summary of Comment:

Elmbridge Borough Council notes that the additional urban and Green Belt sites have the potential to increase housing provision in the Local Plan, and that the transport assessment identifies increased traffic movements in some areas adjacent to Elmbridge. It trusts that, should any of these sites be taken forward as modifications to the Local Plan, appropriate mitigation measures would also be included to address the congestion identified.

Response:

Elmbridge Borough Council's review of the additional evidence is welcomed and the comments regarding the potential for increased traffic movements in areas adjacent to Elmbridge are acknowledged. However, it is noted that Epsom & Ewell is not directly adjacent to Elmbridge, being separated by the Royal Borough of Kingston upon Thames.

Should any additional sites be taken forward through modifications to the Local Plan, the Council will continue to have regard to the findings of the transport evidence and the need for appropriate mitigation where identified.

Summary of Representations

The following schedules provide an overview to both the number of representations per document, together with an overall summary of comments made and key issues arising.

COUD_020 – Assessment of Urban Sites

List of sites considered to be developable	
Comments Received:	EEBC response:
Urban and brownfield opportunities should be more fully exhausted before considering Green Belt release.	Comments noted. COUD_020 was prepared to revisit previously discounted urban sites on the basis of lack of availability and to ensure that the contribution of urban land to housing delivery had been reviewed as part of the post-hearing evidence base.
COUD_020 is incomplete because smaller sites previously discounted at stage 1 of the LAA have not been reassessed.	Comments noted. On the request of the Inspector COUD_020 focused on a specific set of previously assessed urban sites contained within the LAA (where availability was unknown); however, the wider land availability evidence base has informed plan preparation as a whole.
Greater effort should be made to contact site owners and test development potential.	Comments noted regarding owner engagement and site availability. Availability and deliverability are key considerations and have informed the conclusions reached in the document. Land Registry searches were undertaken to identify freehold ownership details, and landowners were contacted in a proportionate manner.
Concerns are raised about the robustness, consistency and completeness of the evidence base.	Comments noted. The purpose of COUD_020 was to provide further assessment of urban sites following the Inspector's post-hearing correspondence.
Suggestion that name of site '4 Cressinghams, Epsom' (TOW027) be changed to something more appropriate, as its part of Ashley Court, not 'Cressinghams'	Comment and suggestion noted.

<p>Archaeological / AHAP constraints are said to be inconsistently recorded (see Surrey County Council’s response above).</p>	<p>Comments noted regarding archaeological constraints and AHAP references and the consistency of this information across the relevant documents, notably on sites HOR004, NON013 and NON016, as well as TOW041.</p>
<p>With regard to ‘Land west of Ewell By-Pass’ (EWE012), concerns are raised about the loss of biodiversity, mature trees, green corridors and open character.</p>	<p>Comments noted. The site has been assessed in the context of the evidence base as a whole, including site characteristics and constraints. Any future proposal would need to address relevant policy requirements, including biodiversity and design considerations.</p>
<p>Objections are raised to the loss of valued community / social facilities in the town centre, specifically at Conservative Club, Epsom Club and Church (TOW002).</p>	<p>The site is suitable for residential-led mixed-use redevelopment and the document (p24) states that the redevelopment would have impacts on the existing church and community uses, which would require justification or reprovision. In addition, any loss of community or leisure uses would need to be justified and/or re-provided in accordance with Submission Local Plan Policy DM20 (Community and Cultural Facilities).</p>
<p>Loss of employment land / floorspace as a result of redeveloping existing employment uses is raised as a concern.</p>	<p>Note concern regarding the loss of employment land and floorspace. The suitability of sites for redevelopment must be considered in the context of the overall evidence base, including existing use, site characteristics, availability for redevelopment and relevant employment evidence. That being said, we have suggested a number of mixed-use sites in COUD_029, including: TOW002, TOW007, TOW008, TOW016, TOW041, TOW067, which all include employment floorspace, as well as housing, in a potential allocation.</p>
<p>Some comments raise flood risk, traffic, amenity and environmental concerns.</p>	<p>Note that respondents have raised concerns regarding flood risk, traffic, amenity and environmental effects. Such matters have informed the urban site assessment and, where relevant, would also require detailed consideration at planning application stage.</p>

List of sites not considered to be developable	
Comments Received:	EEBC response:
Urban and brownfield opportunities should be more fully exhausted before considering Green Belt release.	Comments Noted. COUD_020 was prepared to revisit specific previously discounted urban sites detailed in the Land Availability Assessment (2024) to test whether they could be considered developable and contribute to housing delivery.
The assessments in COUD_020 are inconsistent, with some excluded sites appearing equally or more suitable than sites proposed for allocation.	The assessment of urban sites in COUD_020 reflects a range of factors, including suitability, availability, achievability and site-specific locational constraints or opportunities.
The landowner at 47 Cheam Road (NON003) states that their property was incorrectly included and is not available for development.	We note the landowner's representation regarding site availability. As detailed in COUD_029 the site is discounted as a potential allocation on the advice of the Lead Local Flood Authority.
Suggestion that greater weight is given to suitable urban redevelopment sites for housing, with specific reference to Homebase, 23 Reigate Road (EWE005).	The landowner for Homebase, 23 Reigate Road (EWE005) has advised that the site is not available for residential redevelopment as the site has been purchased and is intended to be occupied by a retailer (see p. 65 of COUD_020). As availability is a key part of developability, the site is not considered suitable for allocation for housing within the Plan period.

COUD_021 – Green Belt Topic Paper - Additional Work

Major Developed Sites	
Comments Received by:	EEBC Response:
<p>1. <u>West Park (Major Developed Site)</u></p> <p>Concerns raised about cumulative impact on the Green Belt from multiple proposed allocations</p> <p>British horse society (Rep 14) request that development in these locations must ensure that equestrian use of the bordering rights of way and/or common land must be protected and enhanced, with improved safe connectivity to include all vulnerable road users.</p> <p>There are no obvious benefits of the removal of hospital sites from the Green Belt, disagree with the boundaries outlined</p> <p>Disagree with the way PDL has been calculated.</p>	<p>The comments are noted</p> <p>The purpose of the topic paper is not to consider the cumulative impacts of site allocations.</p> <p>The area is already developed, and the Policies Map proposes that the green belt be amended to tightly wrap around these areas</p>
<p>2. <u>Manor Park (Major Developed Site)</u></p> <p>Concerns raised about cumulative impact on the Green Belt from multiple proposed allocations</p> <p>There are no obvious benefits of the removal of hospital sites from the Green Belt, disagree with the boundaries outlined</p> <p>Disagree with the way PDL has been calculated</p>	<p>The Green Belt Topic Paper focuses solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account.</p> <p>The area is already developed, and the Policies Map proposes that the green belt be amended to tightly wrap around these areas.</p>
<p>3. <u>Livingstone Park (Major Developed Site)</u></p>	

<p>Concerns raised about cumulative impact on the Green Belt from multiple proposed allocations</p> <p>There are no obvious benefits of the removal of hospital sites from the Green Belt, disagree with the boundaries outlined</p> <p>Disagree with the way PDL has been calculated</p>	<p>The Green Belt Topic Paper focuses solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account.</p> <p>The area is already developed, and the Policies Map proposes that the green belt be amended to tightly wrap around these areas.</p>
<p>4. <u>Clarendon Park (Major Developed Site)</u></p> <p>Concerns raised about cumulative impact on the Green Belt from multiple proposed allocations</p> <p>British horse society (Rep 14) request that development in these locations must ensure that equestrian use of the bordering rights of way and/or common land must be protected and enhanced, with improved safe connectivity to include all vulnerable road users.</p> <p>There are no obvious benefits of the removal of hospital sites from the Green Belt, disagree with the boundaries outlined</p> <p>Disagree with the way PDL has been calculated</p>	<p>The Green Belt Topic Paper focuses solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account.</p> <p>The area is already developed, and the Policies Map proposes that the green belt be amended to tightly wrap around these areas.</p>
<p>5. <u>St Ebbas (Major Developed Site)</u></p> <p>Concerns raised about cumulative impact on the Green Belt from multiple proposed allocations.</p> <p>British horse society (Rep 14) request that development in these locations must ensure that equestrian use of the bordering rights of way and/or common land must be protected and enhanced, with improved safe connectivity to include all vulnerable road users</p> <p>There are no obvious benefits of the removal of hospital sites from the Green Belt, disagree with the boundaries outlined</p>	<p>The Green Belt Topic Paper focuses solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account.</p> <p>The area is already developed, and the Policies Map proposes that the green belt be amended to tightly wrap around these areas.</p>

Disagree with the way PDL has been calculated	
<p>6. <u>Epsom College (Major Developed Site)</u></p> <p>Bidwells (obo Epsom College): Supports the conclusion that exceptional circumstances exist for parcel but questions how this will be reflected in the local plan and Policies Map. They seek clarification on how this will be reflected moving forward?</p> <p>Wider concerns raised about cumulative impact on the Green Belt from multiple proposed allocations.</p>	The comments are noted.
<p>7. <u>NESCOT (Major Developed Site)</u></p> <p>NESCOT raises concerns that the Green Belt assessment is inconsistent, particularly in how the site is treated compared to the nearby Priest Hill site which shares many similarities. The assessment dissects the site and fails to account for the site’s operational needs, use, and future development potential, as well as national policy guidance on Green Belt and grey belt. NESCOT believes all parts of its land should be released together to ensure a coherent, flexible, and sustainable approach to development.</p> <p>Concerns raised about cumulative impact on the Green Belt from including infrastructure pressure (e.g. station capacity), ecological harm alongside nearby conservation sites, and cumulative effects when combined with other allocations</p>	<p>The comments are noted.</p> <p>The Council has applied a consistent methodology to reviewing the seven Major Development Sites in the Green Belt. The Policies Map proposes that the green belt be amended to tightly wrap around the developed areas of the site.</p> <p>The topic paper does not consider non Green Belt matters.</p> <p>The submission Local Plan is being examined against the NPPF 2023, which does not include Grey Belt policy.</p>

Green Belt Sites promoted through the Land Availability Assessment (LAA)	
Comments Received:	EEBC Response:
Land West of Burgh Heath Road (COL017)	

Objection to the conclusion that COL017 should be released from the Green Belt, the site scores 7 out of 9 as a Green Belt parcel and therefore continues to perform strongly against Green Belt purposes, particularly in relation to preventing sprawl and safeguarding the countryside.

There are inconsistencies in the Council's assessment e.g. in terms of how it assessed COL017 on the opposite side of the road as satisfying the test but COL019 as not satisfying the test

The reliance on the adjoining South Hatch Stables development as a reason why harm from releasing COL017 would be less significant is not valid. The level of harm is more than before. The adjoining scheme was an exceptional enabling development and should not be used to justify further encroachment into the Green Belt. It should not be treated as creating a new defensible urban edge or as a justification for incremental encroachment of a high performing parcel

The site acts as a buffer between existing housing and the adjoining development and should not be treated as creating a new defensible urban edge. Infilling would cause substantial harm to openness given the sites elevated topography which makes the site visually prominent and important to local openness.

Exceptional circumstances are not justified and the site should remain in the Green Belt

The suggested mitigation through natural screening is unrealistic, given the elevated land levels which will impact the wider landscape/character. The topography increases the visual prominence of the site and contributes to the sense of openness.

The assessments in the topic paper are based on professional judgement in applying the agreed methodology.

The full assessment is contained on page 25-28, it recognises that the site has a high score but the detailed assessment explains the implications of the development south of the site (known as South Hatch).

Officers are satisfied that the assessment was carried out in a consistent manner, with a clear methodology set out, focusing solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account.

The topic paper has considered paragraph 147 in the NPPF 2023 regarding PDL land and land well served by public transport in the conclusion section of the topic paper.

Insufficient weight has been given to the requirement to prioritise land that is previously developed and/or well served by public transport as set out in the NPPF 2023

Objections on the basis that the site performs poorly for transport, with unsafe walking routes, limited bus services, and likely high car dependency. Distance to Epsom Downs Train Station is misleading- this would be along unsafe, without pavement and unlit routes.

Concerns that no explanation has been provided in paper COUD_021 or elsewhere, as to why, in the absence of any changed evidence with respect to any of these sites and different decisions were reached.

Disagree with the way PDL has been calculated

Concerns about the disaggregation of green belt parcels including this site, where it forms part of a larger parcel not being properly assessed on their own merits.

Comments not related to Calverton Tests

The adjoining equine use (South Hatch Stables) remains materially different from conventional housing and that 50 dwellings on the site would create land-use incompatibility with the operational stables and grazing land, including concern about noise and disturbance affecting racehorses.

Potential conflicts between housing use and equine use are highlighted including noise, disturbance, loss of grazing land.

Objections on the basis of biodiversity loss, wildlife impacts, increased traffic and safety issues, and insufficient local services to support development

<p>British horse society (Rep 14) request that development in these locations must ensure that equestrian use of the bordering rights of way and/or common land must be protected and enhanced, with improved safe connectivity to include all vulnerable road users.</p>	
<p>Land east of Burgh Heath Road (COL019)</p> <p>The site is consistently described as high-performing Green Belt (around 7/9 score) and would lead to Irreversible loss of openness.</p> <p>Encroachment into countryside and greater perception of urbanisation.</p> <p>There are inconsistencies in the Council’s assessment e.g. in terms of how it assessed COL017 on the opposite side of the road as satisfying the test but COL019 as not satisfying the test</p> <p>The site is considered to act as a buffer and the redevelopment of the site would be the loss of buffer and increased risk of coalescence</p> <p>The site is elevated and highly visible, prominent from surrounding roads and rights of way. Key views and openness will be lost, and the proposed screening/landscaping will be ineffective.</p> <p>The site performs poorly for transport and accessibility, with unsafe and unlit walking routes, limited and infrequent bus services, and likely high car dependency. Stations are 25 minutes away along unsafe and unlit routes</p>	<p>The assessments in the topic paper are based on professional judgement in applying the agreed methodology.</p> <p>This site comprises two Green Belt parcels (parcels 33 to the north and parcel 34 to the south). Two areas of the parcels are being promoted for development. David Neame obo Wates Development is proposing the development of parcel 33 for residential uses, while Bidwells obo Epsom College is promoting part of parcel 34. Bidwells do not identify a specific use for this site although it is suggested that it should be allocated to meet ‘education and specialist accommodation needs’, with the site being included as a minor extension to the Epsom College (Major Developed Site) identified in Council’s Green Belt Topic Paper Update (January 2026) which reflects the boundary in Appendix 1E as shown in Bidwells submission at Regulation 19.</p> <p>The Council has assessed the degree of harm to be significant if the site in whole or in part (northern part) were to be developed. The full assessment is contained on page 29-32, It is considered that this harm could not be satisfactorily ameliorated.</p> <p>Officers are satisfied that the assessment was carried out in a consistent manner, with a clear methodology set out, focusing solely on the harm to,</p>

<p>PDL on page 111 is actually only dismantlable horse shelter which serves the horses currently grazing the land.</p> <p>Exceptional circumstances not demonstrated.</p> <p><u>Comments not related to Calverton Tests</u></p> <p>Potential conflicts between housing use and equine use are highlighted including noise, disturbance, loss of grazing land.</p> <p>Ecological and biodiversity concerns are raised, loss of wildlife, habitat connectivity, fragmentation.</p> <p>British horse society (Rep 14) request that development in these locations must ensure that equestrian use of the bordering rights of way and/or common land must be protected and enhanced, with improved safe connectivity to include all vulnerable road users</p> <p><u>Landowners/Agent Representation</u></p> <p>Bidwells (obo Epsom College) note that the Council has assessed the larger land parcel and they consider that if a smaller parcel were assessed the conclusions would be different. The smaller site put forward is in control of the College, and next to the college boundary. The specific use has not been identified but the site will be for enhanced educational facilities. They consider their site has a good degree of containment close to the built edge and that exceptional circumstances exist.</p> <p>David Neame (obo Wates Development) note that the assessment is of the larger land parcel, their site is only the northern part. The assessment is flawed for a number of reasons, including ignoring the South Hatch development nearby, inconsistency is scoring the northern</p>	<p>and mitigation of, Green Belt purposes, without taking other constraints into account.</p> <p>The topic paper has considered paragraph 147 in the NPPF 2023 regarding PDL land and land well served by public transport in the conclusion section of the topic paper.</p>
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<p>and southern parcel and explanation regarding mitigation is illogical. Considers the site is inconsistently assessed in comparison to site COL017 which has very similar characteristics.</p>	
<p>Land near Downs Road -north (COL020)</p> <p>British horse society (Rep 14) request that development in these locations must ensure that equestrian use of the bordering rights of way and/or common land must be protected and enhanced, with improved safe connectivity to include all vulnerable road users</p> <p>Object to the extension of urbanisation on the lands approaching the area of the hub of the racecourse itself (COL020/21/22) will deprive the area of its significance and diminish its impact as a unique asset to the town.</p>	<p>This site is not being promoted for development but for woodland creation along with others as part of green infrastructure enhancement alongside the proposed development of COL023.</p>
<p>Land near Downs Road -South (COL021)</p> <p>Object to the extension of urbanisation on the lands approaching the area of the hub of the racecourse itself (COL020/21/22) will deprive the area of its significance and diminish its impact as a unique asset to the town.</p>	<p>This site is not being promoted for development but for woodland creation along with others as part of green infrastructure enhancement alongside the proposed development of COL023.</p>
<p>Clear Heights, Downs Road (COL022)</p> <p>Object to the extension of urbanisation on the lands approaching the area of the hub of the racecourse itself (COL020/21/22) will deprive the area of its significance and diminish its impact as a unique asset to the town.</p>	<p>Noted. The assessment for the site on page 44 concludes that ‘release of the site would be disproportionate and fragment the high performing GB in this location and that exceptional circumstances do not exist to release the land from the Green Belt.</p>

<p>Land near Downs Road-east (COL023)</p> <p>The Council has accepted there are exceptional circumstances but are not releasing sufficient sites to address the housing need.</p> <p>Considers there to be inconsistent approach to site selection to other sites e.g. Horton Farm which has similar or only slightly better scores in transport/sustainability scoring.</p> <p>The site COL023 will make a positive contribution to meet the housing need and housing affordability. The site is in single ownership and sustainable location. The site is a logical extension.</p> <p><u>Landowner / Agent Representation</u></p> <p>Savills obo Atkins (rep 252) submits supporting evidence for the omission site COL023. Consider the omission of the site to be unjustified given the significant shortfall in housing. The additional sites will only deliver approximately 59% of the objectively assessed housing need and the Council can only deliver a further 193 dwellings in the urban area and only in the later part of the plan period</p>	<p>The assessments in the topic paper are based on professional judgement in applying the agreed methodology.</p> <p>The Council has assessed the degree of harm to be significant if the site in whole or in part (northern part) were to be developed. The full assessment is contained on page 42-45.</p> <p>Officers are satisfied that the assessment was carried out in a consistent manner, with a clear methodology set out, focusing solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account.</p>
<p>Hook Road Arena (COU026)</p> <p>British horse society (Rep 14) request that development in these locations must ensure that equestrian use of the bordering rights of way and/or common land must be protected and enhanced, with improved safe connectivity to include all vulnerable road users</p>	<p>The comments are noted but are not relevant to the application of the Topic Paper methodology.</p> <p>Hook Road Arena formed part of the submission Local Plan and was discussed as part of the hearings held during Sept/Oct 2025.</p>

<p>Concerns raised about flood risk / surface water. The site is described as already struggling with drainage and its loss would affect the surrounding area increasing flood risk and runoff.</p> <p>Concern of the cumulative impact of nearby allocations e.g. development at Hook Road Arena combined with Horton Farm would impact traffic, environment</p>	
<p>Cuddington Glade (HOR001)</p> <p>The site plays an important buffer/transition role between urban development and open countryside. The description of development as “natural rounding off” is considered misleading and undervaluing its current function.</p> <p>Concerns raised about the cumulative impacts - around 18 sites in the Horton area are proposed for potential Green Belt release, these are assessed individually rather than cumulatively.</p> <p>Objection to reliance on the Calverton “exceptional circumstances” test applied to multiple sites. A comprehensive cumulative assessment should be used with emphasis on brownfield-first development instead of Green Belt release.</p> <p>Concerns about the loss of openness.</p> <p>Concerns that no explanation has been provided in paper COUD_021 or elsewhere, as to why, in the absence of any changed evidence with respect to any of these sites and different decisions were reached.</p>	<p>The assessments in the topic paper are based on professional judgement in applying the agreed methodology.</p> <p>The Council has assessed this small part of a lower performing green belt parcel on page 50-52.</p> <p>The site is detached from the Urban Area Boundary it is adjacent to existing residential development to the north.</p> <p>Officers are satisfied that the assessment was carried out in a consistent manner, with a clear methodology set out, focusing solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account.</p>

Concerns about the disaggregation of green belt parcels including this site, where it forms part of a larger parcel not being properly assessed on their own merits.

Comments not related to Calverton Tests

Concerns raised by the proposed 70-bed care home including traffic, parking, and infrastructure impact.

Objections to development on the site, it is Green Belt, greenfield land adjacent to woodland and Epsom Common SSSI.

Ecological fragmentation, individual and cumulative concern about combined impact of HOR001 and HOR004, potentially enclosing the area with development from both sides

Impact on Epsom Common would be harmful to the setting of a SSSI

Key cumulative impacts identified included Green Belt erosion, increased urbanisation, impact on Horton corridor, Traffic increases, parking pressure Infrastructure strain (roads, utilities) pressure on schools and GP capacity issues.

The site is seen as playing an importing green corridor in supporting biodiversity linked to Epsom Common SSSI to surrounding connecting habitats e.g. Long Grove Park / Gibbs Open Space.

Loss of a green gap between built areas and open space.

Concerns about reduced visual amenity Impact on trees (TPOs) and landscape setting.

Loss of amenity and Local Character.

<p><u>Landowner / Agent Representation</u></p> <p>Supports the Council’s assessment that the site makes limited contribution to the Green Belt. The site is deliverable within five years and currently a pending planning application for a new care home on the site (REP069).</p>	
<p>Hollywood Lodge HOR002</p> <p>British horse society (Rep 14) request that development in these locations must ensure that equestrian use of the bordering rights of way and/or common land must be protected and enhanced, with improved safe connectivity to include all vulnerable road users.</p> <p>Inconsistency in the assessment of this site in the topic paper and the Sustainability Appraisal.</p>	<p>The comments are noted but are not relevant to the application of the Topic Paper methodology.</p> <p>Officers are satisfied that the assessment was carried out in a consistent manner, with a clear methodology set out, focusing solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account. The Sustainability Appraisal considers a broader range of sustainability factors.</p>
<p>Manor Park (HOR003)</p> <p>Objection to the site. Concerns about habitat fragmentation.</p> <p>Development here would represent sprawl.</p> <p>The site is largely undeveloped land, semi natural with significant tree coverage including many TPOs and immediately adjacent SSSI.</p>	<p>Officers are satisfied that the assessment was carried out in a consistent manner, with a clear methodology set out, focusing solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account.</p> <p>The site has been appraised for potential use as a habitat bank for biodiversity net gain.</p>

<p>The Council’s own assessment suggests the site is suitable for off-site BNG.</p> <p>Concerned that the document does not adequately consider the cumulative impact on the Green Belt arising from multiple proposed allocations across Manor Park, Livingstone Park, Noble Park, Clarendon Park, Parkview, Horton, Oak Glade and Cuddington Glade.</p>	
<p>Land off Cuddington Glade (HOR004)</p> <p>Objection to removing the site from the Green Belt. The case for “exceptional circumstances” (Calverton test) is not demonstrated.</p> <p>Impact on Green Belt buffer, concerns that a major development here will harm the area's open character and peaceful residential feel.</p> <p>Criticism of the over-reliance on parcel-wide scoring to justify release, calls for a robust cumulative assessment focusing on brownfield-first approach.</p> <p>Concerns that no explanation has been provided in paper COUD_021 or elsewhere, as to why, in the absence of any changed evidence with respect to any of these sites and different decisions were reached.</p> <p>Concerns about the disaggregation of green belt parcels including this site, where it forms part of a larger parcel not being properly assessed on their own merits.</p> <p><u>Comments not related to the Calverton Tests</u></p>	<p>The assessments in the topic paper are based on professional judgement in applying the agreed methodology.</p> <p>The Council has assessed this small part of a lower performing green belt parcel on page 59-61 and it is considered that exceptional circumstances exist to justify an amendment to the Green Belt boundary.</p> <p>Officers are satisfied that the assessment was carried out in a consistent manner, with a clear methodology set out, focusing solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account.</p> <p>The purpose of the topic paper is not to consider the cumulative impacts of site allocations.</p>

The site is considered to be public open space / amenity grassland containing protected trees (TPOs) and important to the parkland character of Manor Park. Development would lead to loss of a green area for local residents contrary to historic planning rationale that enabled earlier development in the area.

Concerns raised about the impact on Epsom Common SSSI. The site is a green buffer and redevelopment would result in the loss of a tranquil setting of the SSSI, with the introduction of noise, light and urban activity. Removing a buffer and creating continuous urban development from the Common to Manor Park.

Concerns raised by habitat loss and increased ecological fragmentation.

Concerns raised by the potential negative impacts, significant increase in traffic, construction vehicles, noise and air pollution

Access issues raised. Site access is considered unsuitable, relying on: A single access via Cuddington Glade / Oak Glade (private road / cul-de-sac).

Concerns about increased traffic. Poor transport score and likely over reliance on car travel due to limited public transport.

Concerns about lack of parking, and potential parking shortfall, worsened by the cumulatively impacts of proposed development here.

Concerns about impact on local infrastructure, specifically Stamford Green Primary School (adjacent site) GPs, schools and road capacity

<p>Construction impacts near the school: Safety risks Noise and air quality issues</p> <p><u>Landowner / Agent Representation</u></p> <p>Supports the allocation of the site, states that the site does not perform strongly to the purposes of the Green Belt and can deliver 50 new homes including affordable housing (REP039).</p>	
<p>West Park LAA Reference (HOR005 and HOR006)</p> <p>British horse society (Rep 14) request that development in these locations must ensure that equestrian use of the bordering rights of way and/or common land must be protected and enhanced, with improved safe connectivity to include all vulnerable road users</p>	<p>The comments are noted but are not relevant to the application of the Topic Paper methodology.</p>
<p>Noble Park extension (HOR007)</p> <p>British horse society (Rep 14) request that development in these locations must ensure that equestrian use of the bordering rights of way and/or common land must be protected and enhanced, with improved safe connectivity to include all vulnerable road users</p> <p>Objections to the site coming forward. The site is a valuable environmental asset and forms an important wildlife corridor linking Epsom Common and Horton Country Park.</p>	<p>The comments are noted but are not relevant to the application of the Topic Paper methodology.</p>
<p>West Park LAA Reference (HOR008)</p>	

<p>British horse society (Rep 14) request that development in these locations must ensure that equestrian use of the bordering rights of way and/or common land must be protected and enhanced, with improved safe connectivity to include all vulnerable road users</p>	<p>The comments are noted but are not relevant to the application of the Topic Paper methodology.</p>
<p>Horton Farm (HOR009)</p> <p>Objections to the release of Horton Farm from the Green Belt as it is a high-performing Green Belt site scoring 8/9.</p> <p>Development would cause significant sprawl and represent major encroachment into countryside.</p> <p>The Council contradicts its own evidence by proposing release of a site it previously assessed as highly sensitive.</p> <p>Development would extend Epsom outward merging Epsom and Ewell into a continuous urban area.</p> <p>Calverton tests are not met.</p> <p>Permanent loss of open countryside.</p> <p>Comments highlight the site’s ecological and wildlife value, considered to be a wildlife corridor connected to surrounding areas habitat for flora, fauna, and mature trees.</p> <p>Concerns of transport and infrastructure pressures, existing severe congestion already on Hook Road would worsen traffic Increase pressure on: Roads schools GP services and Flooding / drainage concerns.</p>	<p>Horton Farm formed part of the submission Local Plan and was discussed as part of the hearings held during Sept/Oct 2025.</p> <p>Officers are satisfied that the assessment was carried out in a consistent manner, with a clear methodology set out, focusing solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account.</p>

<p>Land at Chantilly Way (HOR010)</p> <p>No comments</p>	<p>n/a</p>
<p>Land south of West Cottage, Livingstone Park (HOR011)</p> <p>Concerned that the document does not adequately consider the cumulative impact on the Green Belt arising from multiple proposed allocations across Manor Park, Livingstone Park, Noble Park, Clarendon Park, Parkview, Horton, Oak Glade and Cuddington Glade.</p>	<p>Officers are satisfied that the assessment was carried out in a consistent manner, with a clear methodology set out, focusing solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account.</p>
<p>Clarendon Park (HOR012)</p> <p>British horse society (Rep 14) request that development in these locations must ensure that equestrian use of the bordering rights of way and/or common land must be protected and enhanced, with improved safe connectivity to include all vulnerable road users.</p>	<p>The comments are noted but are not relevant to the application of the Topic Paper methodology.</p>
<p>Horton Hospital, Livingstone Park (HOR014)</p> <p>Concerned that the document does not adequately consider the cumulative impact on the Green Belt arising from multiple proposed allocations across Manor Park, Livingstone Park, Noble Park, Clarendon Park, Parkview, Horton, Oak Glade and Cuddington Glade.</p>	<p>Officers are satisfied that the assessment was carried out in a consistent manner, with a clear methodology set out, focusing solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account.</p>
<p>Land at Priest Hill (NON013)</p>	<p>The assessments in the topic paper are based on professional judgement in applying the agreed methodology.</p>

Objections to Green Belt release at Priest Hill. The site performs strong on Green Belt functions. “Exceptional circumstances” have not been demonstrated, development would lead to urban sprawl and coalescence of settlements (Epsom, Ewell, Banstead). Only Priest Hill Nature Reserve separates the area

Independent Green Belt studies Atkins 2017–2018 found the site unsuitable.

One of the original purposes of Green Belt designation is to “provide opportunities for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity”. Priest Hill playing fields and Nescot’s sports pitches have been in continuous use for decades

Concerns that no explanation has been provided in paper COUD_021 or elsewhere, as to why, in the absence of any changed evidence with respect to any of these sites and different decisions were reached

Disagree with the way PDL has been calculated

Comments not related to the Calverton Tests

Loss of recreation land with strong community value. The site is described as being heavily used public open space and a major community hub for: rugby, football, informal recreation (dog walking, running, etc.)

The site is not surplus or underused land (contrary to the Council’s description) There are few alternative facilities locally. Its loss would harm the health and wellbeing of youth sport participation.

The loss of Playing Fields would conflict with national and local policy with existing shortage of sports facilities in the borough Playing Pitch

The assessment is set out on page 87-90 where it is concluded that the parcel is overall high scoring against the Green Belt purposes, the site is on the edge of settlement with a close relationship with the adjoining urban character, whilst there is a degree of harm, it is concluded that harm from the comprehensive development of the site could be ameliorated for the site. Therefore, on balance, based on the Calverton test it is considered there are exceptional circumstances justifying an amendment to the Green Belt boundary.

Officers are satisfied that the assessment was carried out in a consistent manner, with a clear methodology set out, focusing solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account.

<p>Strategy (2021). Priest Hill provides multiple rugby pitches and sports facilities</p> <p>Concerns also about unviable relocation proposals (e.g. Hook Road Arena) Risk to financial sustainability of sports clubs.</p> <p>Biodiversity and Ecological concerns about impact on Priest Hill Nature Reserve (adjacent SNCI), rare chalk grassland habitat. Similar comments about habitat loss and fragmentation, light and noise pollution.</p> <p>Species at risk include: Skylarks, small blue butterfly, rare plants and moths. Ecology and biodiversity have not been properly assessed and no cumulative environmental assessment undertaken.</p> <p>Traffic and Transport concerns raised, Reps note severe congestion on Cheam Road and surrounding roads. Development would add hundreds of vehicles, increase congestion, pollution, road safety risks</p> <p>Criticism raised about transport assumptions being unrealistic about expectation of low car ownership. Poor public transport provision (limited trains/buses)</p> <p>Increased pressure on infrastructure, existing services already under strain, schools are oversubscribed, GP surgeries, road network, rail capacity, and drainage. There are no clear infrastructure mitigation or upgrades are proposed.</p>	
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Concerns about surface water flooding which the local area already experiences. Development would increase runoff and flood risk due to loss of permeable land.

Factual inaccuracies e.g. site not publicly accessible.

Concerns about character, heritage and landscape Impact
Development would be out of character (e.g. high-density / tall buildings), loss of open landscape and visual amenity.

British horse society (Rep 14) request that development in these locations must ensure that equestrian use of the bordering rights of way and/or common land must be protected and enhanced, with improved safe connectivity to include all vulnerable road users.

Landowner / Agent Representation

Strongly supports allocating the site and consider it is necessary to meet the significant shortfall in housing. They agree there are exceptional circumstances, the site is adjacent the urban area, with some PDL and the harm identified can be mitigated through design and retained open space. The separation of settlements would remain adequate. They have submitted supporting information to support the site. They consider the Council has some inaccurate information in the evidence base and have requested changes set out in their representation (Rep 346).

Downs Farm (NON016 and NON042)

Objection to the development of strong performing Green Belt site, with a key strategic role in preventing settlement merging Development of the site would reduce the gap between Epsom and Nork by ~75% (to ~300m), leading to urban sprawl and coalescence

“Exceptional circumstances” are not demonstrated, release contradicts national planning policy (NPPF), it provides a clear sense of openness and separation in this part of Epsom and Nork and helps prevent encroachment into the countryside. Development of this land would permanently alter the character of the area.

The document evidences harm to green belt rather than justifying its release with the site being largely undeveloped and contributing to openness

Site is important to maintaining the Epsom – Nork settlement gap

The site is valued open countryside / chalk downland landscape Part of the setting of Epsom Downs

The justification relies heavily on the southern parcel (NON042) remaining open, risk of future incremental release and concern that this mitigation is not secured.

Development would be visually intrusive, extending the urban area and removing the transition from town to countryside.

Concerns that no explanation has been provided in paper COUD_021 or elsewhere, as to why, in the absence of any changed evidence with respect to any of these sites and different decisions were reached

Disagree with the way PDL has been calculated

The assessments in the topic paper are based on professional judgement in applying the agreed methodology.

The assessment is set out on page 91-94 where it is concluded that whilst some degree of harm is recognised, it is concluded that the impact from development that is focussed on the northern part of the northern parcel could be ameliorated. The green buffer from the northern parcel and the southern parcel retained for Green Infrastructure would ensure a degree of separation is maintained between the urban area of Epsom and Nork. Based on the Calverton test above it is considered that there are exceptional circumstances justifying an amendment to the Green Belt boundary for the northern parcel of the site.

Officers are satisfied that the assessment was carried out in a consistent manner, with a clear methodology set out, focusing solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account.

Comments not related to the Calverton Tests

Fails to consider wider impacts such as the chalk downs landscape, setting of the Epsom Downs Racecourse and Heritage assets (listed buildings and conservation areas).

Harm the character of conservation areas

Concerns raised about biodiversity and ecological impact, the site is calcareous grassland (rare habitat), it supports species such as: Deer, bats, birds (including skylark), hedgehogs

Fragmentation of wildlife corridors e.g. Impact on nearby: Sites of Nature Conservation Importance (SNCIs)

There is no proper cumulative ecological assessment undertaken

Traffic and Transport Issues raised Local roads (e.g. Reigate Road, Longdown Lane) are already severely congested and operating near or above capacity, the development (≈500+ homes) would add and exasperate problems e.g. Congestion, pollution and road safety

There is poor public transport provision, development would be highly car-dependent

Concerns raised about infrastructure capacity. Existing services already stretched, 2,000 additional residents would put a strain on services including GPs, hospitals, schools, water and wastewater infrastructure and no identified upgrades are secured or funded

The site currently acts as natural drainage. Concerns that development would increase surface runoff flooding downslope and on local roads

<p>Concerns about environmental health with the Chalk Pit waste facility adjacent. Including noise, dust pollution, heavy vehicle movements</p> <p>Scale and Strategy Concerns</p> <p>Downs Farm (~530 homes) seen as a disproportionately large allocation. Concern that the spatial strategy over-relies on Green Belt release instead of brownfield land</p> <p>Concerns that the cumulative impact of the site combined with other sites (e.g. Priest Hill, NESOT) has not been adequately assessed.</p> <p>Criticism of transparency of decision-making. Procedural and Consultation Concern</p> <p><u>Landowner / Agent Representation</u></p> <p>Acknowledges the inaccuracies/inconsistencies in previous Green Belt work and note these have been revisited. Welcome and support the approach taken and consider it now to be sound and consistent (Rep 266).</p>	
<p>Drift Bridge Farm (NON021)</p> <p>Comments about the transport impacts, particularly the capacity and constraints at Epsom Downs station</p> <p>Comments about the need for sustainable access measures and potential infrastructure upgrades if the site is allocated.</p>	<p>The assessments in the topic paper are based on professional judgement in applying the agreed methodology.</p> <p>The Council has assessed the degree of harm and concluded that exceptional circumstances do not exist justifying an amendment to the Green Belt boundary. The full assessment is contained on page 95-98.</p>

<p><u>Landowner / Agent Representation</u></p> <p>Andrew Black (Rep 264) draws comparisons with assessments of nearby sites that share similar qualities and scores e.g. Downs Farm (NON016) and (NON013) but notes that different conclusions are drawn. They have submitted supporting information for the site with two potential masterplans (Rep 264).</p>	<p>Officers are satisfied that the assessment was carried out in a consistent manner, with a clear methodology set out, focusing solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account.</p>
<p>Banstead Road (NON038)</p> <p>Promote a community-led / self-build housing model. The site consists of around 80 plots owned by a community of private individuals. The site offers the opportunity for affordable eco homes and custom/self-build housing.</p> <p>Meets specialised housing needs.</p> <p>Aligns with statutory self-build obligations/</p> <p>Supporters emphasise that the site is not typical open countryside.</p> <p>It is centred around an existing fitness centre and parking area. Where proposed development would wrap around this existing hub.</p> <p>Calverton test compliance (explicit justification) “Calverton Test is fully satisfied”</p> <p><u>Landowner Representation</u></p> <p>Support for allocation and development of NON038 in the Local Plan. The site is considered suitable and justified under the ‘exceptional circumstances’ (Calverton) test.</p>	<p>The assessments in the topic paper are based on professional judgement in applying the agreed methodology.</p> <p>The Council has assessed the degree of harm to be considerable and that development could not be satisfactorily ameliorated. The full assessment is contained on page 99-101.</p> <p>Officers are satisfied that the assessment was carried out in a consistent manner, with a clear methodology set out, focusing solely on the harm to, and mitigation of, Green Belt purposes, without taking other constraints into account.</p>

<p>The Looe, Reigate Road (NON040)</p> <p>No comments</p>	<p>n/a</p>
<p>Land near Downs Road-west (WOO019)</p> <p>British horse society (Rep 14) request that development in these locations must ensure that equestrian use of the bordering rights of way and/or common land must be protected and enhanced, with improved safe connectivity to include all vulnerable road users</p>	<p>The comments are noted but are not relevant to the application of the Topic Paper methodology.</p>
<p>Land North of Langley Bottom Farm (WOO020)</p> <p>British horse society (Rep 14) request that development in these locations must ensure that equestrian use of the bordering rights of way and/or common land must be protected and enhanced, with improved safe connectivity to include all vulnerable road users</p>	<p>The comments are noted but are not relevant to the application of the Topic Paper methodology.</p>

COUD_029 – Additional Sites for potential allocation

Chapter 2. Urban Sites	
Comments Received:	EEBC Response:
Urban and brownfield opportunities should be more fully exhausted before further sensitive allocations are considered.	Noted. COUD_029 must be read alongside the wider evidence base, including the review of urban sites and supporting assessments.
General concerns are raised about the deliverability, infrastructure implications and justification for the additional sites.	Note comments, the sites are considered to have a reasonable prospect of being delivered beyond the first five years of the Local Plan.
Groundwater, contamination and drainage constraints are identified by the Environment Agency for a number of urban sites within Source Protection Zones.	We note the Environment Agency's comments, and should the sites be allocated through the Inspector main modifications, criteria relating to source protection zones could be incorporated into the allocation wording.
Wider traffic and infrastructure concerns are raised, with mitigation expected if sites are taken forward.	The Transport Assessment and Infrastructure Delivery Plan (IDP) has assessed the cumulative impact of the Submission Local Plan site allocations and potential additional sites. Should the sites be allocated through the Inspectors main modifications, where necessary criteria relating to site specific transport or other forms of mitigation, could be incorporated into the allocation wording.
<u>Land west of Ewell By-Pass (EWE012)</u> Not truly urban and is valued for its open character, mature trees, biodiversity and conservation interest.	Noted. Any future proposal would need to address relevant site constraints and policy requirements, including biodiversity, heritage and design matters.

<p><u>Land west of Ewell By-Pass (EWE012)</u></p> <p>Heritage / archaeology concerns are raised, including that TOW041 (Laine Theatre Arts) appears to have been omitted from AHAP reporting and that the Ewell Roman historic core is not sufficiently reflected in the assessment of the site: Land west of Ewell By-Pass (EWE012).</p>	<p>We note comments, and should the sites be allocated through the Inspector main modifications, criteria relating to AHAPs could be incorporated into the allocation wording.</p>

Chapter 3. Green Belt Sites	
Comments Received by site:	EEBC Response:
<p>Land West of Burgh Heath Road (COL017)</p> <p><u>General comment</u> The document recognises that the Calverton tests are not the only consideration and that other sustainability factors tell against allocation of COL017.</p> <p>There are inconsistencies between documents on when the site is anticipated to deliver.</p>	<p>That is correct, this document identifies other constraints that apply to the site and provides further detail on the accessibility of the site.</p> <p>Noted, there is an error on p36 of the document which states indicative timescale for delivery '11-15 years'. This should be stated as '6-10 years' to align with Table 7 (p51) and the Trajectory in Appendix 2 (pages 53/54).</p>
<p><u>Green Belt and landscape</u></p> <p>The site is undeveloped, greenfield, agricultural / open pastureland and should remain within the Green Belt.</p> <p>Concern that the Council is relying on the adjoining South Hatch redevelopment as justification for treating the site as a</p>	<p>In terms of Green Belt performance (document reference COUD_021 pages 25 to 28) states whilst it is recognised that the parcel in which the site is located is overall high scoring against the Green Belt purposes, it is the case that an enabling development at South Hatch has already extended the Urban Area edge further south leaving the site as a notable</p>

<p>gap between developed areas. Consider this approach flawed as South Hatch was approved as a specific racehorse training establishment with enabling residential development, not as a basis for further residential expansion into adjoining Green Belt land.</p> <p>The site has become more important, not less, to be kept undeveloped because of development already permitted nearby.</p>	<p>gap that is vulnerable to development in the future. Some degree of harm is recognised although it has been concluded that it could be ameliorated.</p>
<p><u>Residential amenity / visual impact</u></p> <p>Development would be highly visible from surrounding properties and public routes, including Beech Road, Aston Way, Downs Way and Rifle Butts Alley.</p> <p>Concerns to adjoining residential dwellings include overlooking, loss of outlook, visual intrusion.</p> <p>Concerns about harm to the rural character of the area.</p>	<p>Sensitive design could mitigate the impacts on surrounding residential uses and the adjoining public right of way (Rifle Butts Alley).</p>
<p><u>Equestrian uses and racehorse training</u></p> <p>The site forms part of the wider setting of South Hatch and has been used as turnout, grazing or paddock land associated with the racehorse training establishment.</p> <p>The loss of open land, paddocks and turnout areas would conflict with the Council’s commitment to supporting the Racehorse Training Zone and the wider racing industry.</p>	<p>The site does not form part of the defined Racehorse Training Zone as defined on the Submitted Local Plan Policies Map (document reference SD03b).</p> <p>Sensitive design would be required to reduce any conflict between residential use of the site and the adjoining Racehorse Training facility.</p>

<p>Concerns about the operational compatibility of additional residential development with the adjoining South Hatch Stables site of which around 75% remains equine-related with the remaining 25% enabling housing development.</p> <p>British horse society (Rep 14) request that development in these locations must ensure that equestrian use of the bordering rights of way and/or common land must be protected and enhanced, with improved safe connectivity to include all vulnerable road users.</p>	<p>Comments noted.</p>
<p><u>Transport / Accessibility</u></p> <p>The site performs poorly in the Council’s own accessibility assessment ranking 17th out of 26 Green Belt sites. The site scores poorly for access to secondary schools, GPs, pharmacies and rail stations.</p> <p>Due to distance to rail stations and local topography the site will be car dependent.</p> <p>Burgh Heath Road is not suitable for substantial additional traffic due to narrowness, lack of pavement or lighting in places, and a severe S-bend lower down which are likely to increase highway safety risks for drivers, pedestrians, cyclists, horse riders and other users.</p>	<p>The site does perform relatively poorly compared to other Green Belt sites; however, it adjoins the urban area. An infrequent bus service operates in the local area.</p> <p>There may be opportunity to improve accessibility to the site by non-car modes, including improvements beyond the site boundary.</p>
<p><u>Flood Risk</u></p> <p>Development would make the site more vulnerable to flood risk. There are references to previous local drainage/flooding issues, including around Rifle Butts Alley and Treadwell Road.</p>	<p>The additional sites for potential allocation (Document reference COUD_29) on page 37 identifies that the site is Flood Zone 1 and none of the site is at risk of surface water flooding.</p>

<p>Flood risk and drainage implications have been understated, and that development of the site could exceed local infrastructure capacity unless robust drainage and water management evidence is produced.</p>	<p>The submission Local Plan contains Policy S16 Flooding and Sustainable Drainage.</p>
<p><u>Heritage and Archaeology</u></p> <p>The site lies in an Area of High Archaeological Potential and is in close proximity to the site an approximately 4,000-year-old auroch skeleton was discovered. Further archaeological investigation could significantly delay development and potentially require protection of the site.</p> <p>The site is not well suited to quick delivery if the purpose is to identify sites that could come forward promptly to help housing supply.</p>	<p>The Submission Local Plan Policy DM13 relates to development impacting heritage assets, which includes archaeological assets.</p> <p>The site is identified in the revised trajectory (document reference COUD_029, page 52), as having an estimated completion date of 2030/31.</p>
<p><u>Biodiversity</u></p> <p>The site is an undeveloped agricultural field providing habitat for wildlife, including mammals, invertebrates and insects.</p> <p>Concerns that no habitat survey or comprehensive biodiversity assessment appears to have been undertaken.</p> <p>The document acknowledges the site is in a Biodiversity Opportunity Area, but this is not explored sufficiently.</p>	<p>Submission Local Plan Policy S15 seeks to secure 20% biodiversity net gain from greenfield site allocations. This would apply should the site be allocated through a main modification.</p> <p>Such documents are not required to support a potential local plan allocation, although the council has given consideration to any biodiversity designations that apply to the site. Detailed surveys are undertaken at the planning application stage.</p> <p>Biodiversity Opportunity Areas (BOAs) are not a statutory designation. There are 50 individual BOAs within the County of Surrey. BOAs are defined by the Surrey Nature Partnership as ‘extensive areas where improved habitat management, as well as efforts to restore and re-create</p>

	Priority habitats will be most effective in enhancing connectivity to benefit recovery of Priority species in a fragmented landscape’.
<p>Cuddington Glade (HOR001)</p> <p><u>Green Belt / Landscape</u></p> <p>The site is an important Green Belt buffer between existing residential development and the wider Horton Green Belt landscape. Development will result in:</p> <ul style="list-style-type: none"> • loss of openness; • erosion of the Green Belt transition area; • gradual urbanisation of the locality; • harm to the character of Cuddington Glade and the surrounding area. 	<p>In terms of Green Belt performance, the site is a small part of low performing parcel and scores moderately in terms of accessibility relative to other sites. While the site is detached from the Urban Area Boundary it is adjacent to existing residential development to the north. It is acknowledged that there will be a degree of harm should the site be developed although it is considered this could be satisfactorily ameliorated.</p>
<p><u>Scale of development</u></p> <p>Some references were made to the live planning application 26/00002/FUL for HOR001. The LAA refers to HOR001 as providing 10–15 residential units and as “natural rounding off”, whereas the live proposal is described as a 70-bed institutional care home operating on a 24-hour basis. Consider that this is materially different in terms of: traffic, generation; parking demand; servicing; operational impacts; local amenity effects.</p> <p>Request that a full cumulative assessment of the site and HOR004 is undertaken before an allocation proceed.</p>	<p>The assessment of the site in the Green Belt Topic Paper update (document ref COUD_021, pages 50 to 52), reflected the live application. It was concluded that should the site be developed, the extent of harm is limited and could be satisfactorily ameliorated.</p>
<p><u>Biodiversity:</u></p> <p>The biodiversity of this site benefits from its proximity to Epsom Common SSSI and vice versa. The current level of biodiversity and habitat should be assessed and mitigated in the design.</p>	<p>The site’s proximity to the Epsom common SSSI and the need to consider ecological effects is acknowledged. The Submission Local Plan contains Policy S14 (Biodiversity and Geodiversity) and Policy S15 (Biodiversity Net gain). Policy S15 seeks to exceed the statutory minimum</p>

<p>The site acts as a green corridor between the Common and Gibbs open space / Long Grove park, and this needs to be preserved.</p> <p>Ecological fragmentation, individual and cumulative concern about combined impact of HOR001 and HOR004, potentially enclosing the area with development from both sides.</p> <p>Concerns about the impact on Epsom Common.</p> <p>Concerns about visual amenity impact on landscape setting and trees.</p>	<p>of at least 10% from specific greenfield sites. This could apply should the site be allocated through the Inspectors main modifications to the Submitted Local Plan.</p>
<p><u>Transport / Infrastructure</u></p> <p>Concerned about highways impacts including increased traffic generation, parking demand and congestion.</p> <p>Concerned about increased infrastructure demand in conjunction with other site allocations.</p>	<p>The site scores moderately in terms of accessibility relative to other sites and ranks highly in the context of Green Belt sites (document reference COUD_021, page 51).</p> <p>The impact on infrastructure from the potential additional sites has been assessed as part of the IDP Addendum (document reference COUD_032).</p>
<p><u>Landowner representation:</u></p> <p>Confirm that the site is deliverable within 5 years, as demonstrated through the submission of the currently pending planning application for a care home at the site (ref. 26/00002/FUL).</p> <p>The site is considered to be sustainably located and easily accessible via public transport to future staff, this aspect is not so crucial for future care home residents.</p> <p>Agree with the Council’s assessment that any potential impact resulting from the proposed development would be limited, and it is unlikely that residents will use the SSSI for recreational purposes.</p>	<p>The site has been reflected as being deliverable within 5 years in the Revised Trajectory contained within the Additional Sites for Potential Allocation Document (document reference COUD_029, pages 53 to 54).</p>

<p>Land off Cuddington Glade (HOR004)</p> <p><u>Green Belt / Landscape</u></p> <p>The site is an important Green Belt buffer between existing residential development and the wider Horton Green Belt landscape. Development will result in:</p> <ul style="list-style-type: none"> • loss of openness; • erosion of the Green Belt transition area; • gradual urbanisation of the locality; • harm to the character of Cuddington Glade and the surrounding area. 	<p>In terms of Green Belt performance, the site is a small part of low performing parcel and scores moderately in terms of accessibility relative to other sites, although fairly highly in the context of Green Belt sites. While the site is detached from the Urban Area Boundary it is sandwiched between two residential areas (washed over by Green Belt). The potential impact from the development of the site could be ameliorated through careful master planning and natural features could be used to soften or screen views of the built form.</p>
<p><u>Scale of development / Amenity</u></p> <p>The site adjoins Cuddington Glade and would have a significant impact upon the character, openness and residential amenity of the area. The site is important to the parkland character of Manor Park.</p> <p>Some residential properties at Cuddington Glade would be subject to a loss of privacy due to new dwellings overlooking existing rear gardens and habitable rooms in these properties, resulting in a substantial loss of outlook and privacy to the rear habitable rooms and private amenity space.</p> <p>Concerns about impacts to existing properties rear garden access.</p> <p>Concerns about loss of public open space / amenity land.</p> <p>Concerns about the impact on Epsom Common SSSI. Site acts as a green buffer to protect the tranquil setting of the SSSI.</p>	<p>The potential impact from the development of the site could be ameliorated through careful master planning and natural features could be used to soften or screen views of the built form.</p> <p>Policy S12 in the Submission Local Plan relates to Amenity Protection.</p>

<p><u>Biodiversity:</u></p> <p>The site currently forms an important Green Belt buffer between existing residential development and the wider Horton Green Belt landscape. Development would result in the loss of this buffer and contribute to the gradual urbanisation of the area.</p> <p>Concerns about local biodiversity. Deer and badgers are present in the wider area, foxes and hedgehogs are regularly seen locally, and tawny owls have been recorded nearby.</p> <p>Concerns about habitat loss and ecological fragmentation.</p>	<p>The Submission Local Plan contains Policy S14 (Biodiversity and Geodiversity) and Policy S15 (Biodiversity Net gain). Policy S15 seeks to exceed the statutory minimum of at least 10% from specific greenfield sites. This would apply should the site be allocated through a main modification to the plan.</p>
<p><u>Transport / Infrastructure:</u></p> <p>Concerned about highways impacts including increased traffic generation, parking demand, congestion, noise and air pollution.</p> <p>Concerned that access relies upon the existing private access road shared by Cuddington Glade and Oak Glade and that 4 parking spaces will be lost to facilitate access to the site.</p> <p>Concerned about increased infrastructure demand in conjunction with other site allocations. This includes schools, specifically Stamford Green Primary School which is adjacent to the site, GPs and road capacity.</p> <p>Poor transport score and likely over reliance on car travel due to limited public transport.</p>	<p>The site scores moderately in terms of accessibility relative to other sites and ranks fairly highly in the context of Green Belt sites (document reference COUD_021, page 60).</p> <p>The impact on infrastructure from the potential additional sites has been assessed as part of the IDP Addendum (document reference COUD_032)</p>
<p><u>Landowner representation:</u></p>	<p>Noted.</p>

The site is owned freehold by a single entity. Delivery will not be impeded by legal constraints or site assembly.

The site boundary runs up to and adjoins the private highway in Cuddington Glade. The site promoter benefits from an all purposes (unrestricted) right of access over Cuddington Glade including the right to lay services. Furthermore, the adjoining established car park is also owned by the site promoter. Suitable vehicular and pedestrian access together with necessary vision splays can be delivered from various points along the site's southern boundary.

There is no heritage value or heritage assets that will restrict development, and there is no sensitive ecology or irreplaceable habitats that will prohibit development.

The promotion site can also be connected to main utility services.

There are TPO trees on the southern part of the site and in this respect the site promoter has commissioned arboriculture advisors and transport consultants from an early stage of the promotion process to assess the trees and ensure that access solution(s) can navigate the TPO trees and unlock the site's potential.

The site scores 1 (low) against Green Belt performance, Landscape Sensitivity, and Visual Sensitivity. Consultants have undertaken a comprehensive assessment of the site and the wider surrounding area including views into and out of site which confirms that the site does not strongly serve any of the key Green Belt purposes and can accommodate carefully designed development without undermining the strategic function of the wider Green Belt.”

The site is a suitable additional allocation site as part of the new Local Plan. The site is sustainable and accessible and it will make a valuable

<p>contribution towards housing delivery in the early years of the Plan period.</p>	
<p>Land at Priest Hill (NON013)</p> <p><u>Green Belt, openness and landscape character</u></p> <p>The site is a high-performing Green Belt site that helps prevent urban sprawl, safeguard countryside from encroachment and maintain separation between settlements. Development would permanently reduce openness and weaken the gap between built-up areas</p> <p>The site is mostly open playing field or countryside rather than poor-quality or previously developed land, and that hardstanding or derelict built form do not justify wider residential allocation.</p> <p>Landscape and character objections include concern that development would urbanise a semi-rural edge, harm the setting of Priest Hill Nature Reserve, affect the character of Banstead Road and Cheam Road, and introduce built form inconsistent with the surrounding area</p> <p>Development of the site would urbanise a semi-rural edge, harm the setting of Priest Hill Nature Reserve and affect the character of surrounding areas.</p>	<p>In terms of Green Belt performance, whilst it is recognised that the parcel is overall high scoring against the Green Belt purposes, the site is on the edge of settlement with a close relationship with the adjoining urban character. The Green Belt Topic Paper update (document reference COUD_021 page 90) acknowledges that, whilst there is a degree of harm, it is concluded that any harm from the comprehensive development of the site could be ameliorated.</p>
<p><u>Playing Pitch provision and community use</u></p> <p>Sport England (SE) objects to the potential allocation unless suitable replacement provision can be secured. They consider the land to be playing field land and consider that there is no evidence that the playing fields are surplus to requirements. Sport England also notes that Priest</p>	<p>The Position Statement in relation this site (document reference COUD_024), published by the Council in December 2025, identifies that the part of the site leased by Old Suttonians ceased its use for sports in</p>

<p>Hill is identified in the Playing Pitch Strategy as being used by Sutton & Epsom RFC and contributing to community rugby demand</p> <p>Disagreement with the Council’s description of the land as “not publicly accessible” with responses stating that the site has been used for decades by local residents for dog walking, informal recreation and sport and as a route towards Ewell East Station.</p> <p>Concern that development of the site would result in the loss of an accessible or semi-accessible green space with strong community value and outdoor leisure facility which would conflict with public health and outdoor sport objectives.</p>	<p>1999 and that Old Suttonians do not sub-lease or have use agreements with any other parties for the land in their leasehold control.</p> <p>The additional sites for potential allocation (Document reference COUD_029) on page 46 concludes that should the site be allocated through main modifications, the 3.7ha southern part of the site that is in current use by a local sports club should be retained as playing fields. This approach is evidenced by the position statement produced following the Examination Hearings (Document reference COUD_024).</p> <p>The site is privately owned and there are no public rights of way across the site.</p>
<p><u>Infrastructure</u></p> <p>Concerns that local infrastructure including schools (which are oversubscribed), GP surgeries, dentists, hospitals, water, sewerage, electricity and other public services are already under pressure and development of the site would worsen existing problems.</p> <p>Consideration should be given to the cumulative impacts of sites within the submission local plan and the potential additional sites.</p>	<p>The impact on infrastructure from the potential additional sites has been assessed as part of the IDP Addendum (document reference COUD_032).</p>
<p><u>Flood Risk</u></p> <p>Concerns raised about Flood Risk, including incidents of surface water flooding beyond the site boundary around Cheam Road, particularly under the railway bridge by Ewell East Station and that the development of the site will increase risk of future incidents.</p> <p>Loss of permeable land will increase flood risk.</p>	<p>The additional sites for potential allocation document on page 45 identifies that a small proportion of the site is at risk of surface water flooding.</p> <p>The submission Local Plan contains Policy S16: Flooding and Sustainable Drainage.</p>

<p><u>Retail need</u></p> <p>There is no clear justification for new retail uses at the site with reference made to vacant shops in Ewell Village and that new retail provision could draw activity away from the existing village centre, weakening its vitality and viability.</p>	<p>The Council anticipates a small neighbourhood parade to meet the day-to-day needs of residents of the site and users of the train station.</p>
<p><u>Transport / Accessibility</u></p> <p>There are limited rail services from Ewell East Station, with three trains an hour into London which does not justify the scale of development proposed.</p> <p>Network Rail state that if Priest Hill is allocated, improvements to Ewell East Station would be needed because the station has limited step-free access and increased use would be expected.</p> <p>The surrounding road network is already heavily congested with peak hour congestion resulting in queues and rat-running. Concerns about highways safety, increased congestion, highway safety and adequacy of car parking. from development of the site and inadequate car parking.</p> <p>Concern that future residents would still rely heavily on private cars despite the proximity of Ewell East Station</p> <p>Question the accuracy of the accessibility data including the walking distance to primary schools, GP surgeries etc.</p> <p>Transport assumptions are unrealistic about the expectation of low car ownership.</p>	<p>The site in a sustainable location given its proximity to Ewell East railway station, the amenities within Ewell Village and the potential for local convenience retail on the site.</p> <p>Should the site be allocated within the Local Plan through the Inspectors Main Modifications, the Council will work with Surrey County Council and other relevant infrastructure providers to deliver appropriate mitigation including improvements to pedestrian/cycle connectivity and Ewell East Station.</p>

<p><u>Biodiversity</u></p> <p>The site forms part of a wider ecological network, including rare chalk grassland, the adjacent Priest Hill Nature Reserve, and the wider North Downs / Epsom Downs Biodiversity Opportunity Area.</p> <p>Concerns raised about impacts on moths and butterflies in the adjacent Surrey Wildlife Trust nature reserve (designated as an SNCI) and that ecological mitigation or retained green buffers would not adequately compensate for the loss of established habitats and open land.</p> <p>Concerns raised about potential cumulative effects of the site and another potential allocation (Downs Farm) on nearby SNCIs, including recreational pressure, habitat disturbance and loss, fragmentation, lighting, air pollution, domestic pets and non-native species</p> <p>The site provides or supports habitats for mammals, invertebrates, insects, moths, butterflies, reptiles, skylarks, tawny owls and other birdlife.</p>	<p>The site’s proximity to the adjoining nature reserve and the need to consider ecological effects is acknowledged. The Submission Local Plan contains Policy S14 (Biodiversity and Geodiversity) and Policy S15 (Biodiversity Net gain). Policy S15 seeks to exceed the statutory minimum of at least 10% from specific greenfield sites. This would apply should the site be allocated through a main modification to the plan.</p>
<p><u>Land Promoter representation</u></p> <p>Deliverability and Ownership: The site is in single ownership, enabling quicker and simpler delivery. Previous concerns about deliverability (e.g. ownership issues) are now resolved. Development could assist with the Council’s 5-year housing land supply.</p> <p>Sustainable Location: Site is located adjacent to Ewell East railway station, making it highly accessible. Train frequency is understated in evidence (actual: up to 6–7 trains per hour). Well-connected by bus services and active travel routes. Aligns with national policy direction to focus growth around transport hubs.</p>	<p>Noted</p>

Site Benefits:

The scheme would deliver:

Around 275–300 homes (with a preference for 300).

Retail/commercial/community uses including potential healthcare provision.

A new neighbourhood hub and improved station environment.

Public open space, play areas, and green corridors.

10% biodiversity net gain.

CIL contributions toward infrastructure (schools, healthcare, transport).

Challenge to Existing Evidence/Assumptions:

Key criticisms include:

Transport/accessibility assessments underestimate:

- Proximity to green space.
- Walking distances to centres.
- Importance of rail accessibility.

Train frequency data is inaccurate.

Site's accessibility is stronger than reflected in scoring.

Proposed changes to wording and evidence:

Clarify that the northern part is no longer in use as playing fields.

Allow flexibility for commercial/community uses, not just retail.

Update train service description to reflect higher frequency.

Change wording from “required” improvements to “investigated where justified” to ensure flexibility.

Support contributions to walking/cycling improvements but resist overly prescriptive requirements without evidence.

Increase indicative capacity from 275 to 300 dwellings (supported by technical evidence & consistent with national policy to maximise density near stations).

<p>Green Belt position: Strong support for release of the site from the Green Belt: Evidence confirms “exceptional circumstances”. Site is partly previously developed and adjacent to urban area. Harm can be mitigated through design and retention of southern playing fields. Suggest minor boundary amendments to create a logical Green Belt edge.</p> <p>Infrastructure considerations: No fundamental infrastructure constraints identified. Required improvements (e.g. active travel, water supply reinforcement) are manageable and typical, not barriers to development. Development will contribute via CIL and potential on-site provision (e.g. healthcare).</p> <p>Concluding comments: Priest Hill is one of the most sustainable and deliverable Green Belt sites available. A key opportunity to help meet housing needs.</p>	
<p><u>Leaseholder comments</u></p> <p>Sutton & Epsom Rugby Football Club are active tenant of part of the Priest Hill land under a long-term lease with more than 54 years remaining. The site forms a core part of its playing facilities. The developers assumption that a second phase of development could be delivered within 6–10 years is wrong because the club intends to continue its tenancy.</p>	<p>The additional sites for potential allocation document on page 46 states that the site should retain 3.7ha of land to the South that are in current use for playing fields by a local sports club.</p>

<p>Downs Farm (NON016 and NON042)</p> <p><u>General</u></p> <p>The document identifies the site as being suitable for approximately 530 homes but also clearly highlights its constraints which include, transport, flooding, ecology and biodiversity harm.</p>	
<p><u>Green Belt and Landscape</u></p> <p>The site is valued Green Belt land and its release for development would be irreversible. Exceptional circumstances have not been demonstrated to release the site from the Green Belt.</p> <p>Concern that allocation of the site, along with other Green Belt sites will erode the Borough’s character, encourage further future Green Belt release, increase urban sprawl and undermine settlement separation.</p> <p>The site character is open countryside / farmland that forms part of the setting of Epsom Downs and provides the visual separation between settlements.</p> <p>Criticism that the retention of the southern part of the site for open space would not compensate for the wider loss of landscape character.</p> <p>Disproportionately large allocation.</p>	<p>In terms of Green Belt performance, whilst it is recognised that the parcel performs moderately against the Green Belt purposes and some degree of harm is recognised, it is concluded that the impact from development that is focussed on the northern part of the northern parcel could be ameliorated. The green buffer from the northern parcel and the southern parcel retained for Green Infrastructure would ensure a degree of separation is maintained between the urban area of Epsom and Nork.</p>
<p><u>Transport / Accessibility</u></p> <p>The local road network is already under severe pressure, particularly Reigate Road, Longdown Lane North and South, College Road, Cheam Road, the Drift Bridge junction. The existing situation is gridlock, peak-</p>	<p>As stated in the Transport Assessment Addendum (document reference COUD_033a, page 68), “overall the Local Plan sites are mostly reasonable small and/or well located in relation to existing transport connections and amenities. As a result, the highways impacts tend to be local to the development sites themselves and the cumulative impact is</p>

<p>time queuing, rat-running, school-run congestion, pedestrian safety concerns and difficulty crossing roads.</p> <p>Concerns about highway safety on the A240 and deteriorating air quality as a result of development</p> <p>The site has poor accessibility with limited public transport and the distance or practicality of walking to local services and schools. Site will have a high level of car dependency.</p> <p>Failure to consider a cumulative assessment of all Reigate Road Corridor sites</p> <p>Public transport baseline unclear (variation between documents) and the proposed mitigation of diverting the 166 bus is questioned due to service frequency (hourly).</p> <p>The Southern parcel is closer to Epsom Downs Railway Station and should be considered for development instead of the northern parcel for this reason.</p>	<p>in general tolerable. There is a need for localised mitigation tied in with specific development sites as well as schemes to address cumulative impacts.”</p> <p>Should the Downs Farm site be allocated through the Inspectors main modifications to the Submission Local Plan, the Council will work with Surrey County Council (as the Highways Authority), TFL as the operator of the 166-bus route and the developer to identify and deliver appropriate transport mitigation.</p>
<p><u>Biodiversity and Environment</u></p> <p>Loss of productive agricultural land.</p> <p>Impacts upon biodiversity – site supports a wide range of habitats, including rare calcareous grassland and species – loss and fragmentation of habitat and wildlife corridors which would cause irreversible damage.</p> <p>The site is located within the North Downs Biodiversity Opportunity Area and the evidence base gives insufficient weight to biodiversity opportunity, habitat connectivity and nature recovery.</p>	<p>The site’s proximity to the Priest Hill nature reserve and the need to consider ecological effects is acknowledged. The Submission Local Plan contains Policy S14 (Biodiversity and Geodiversity) and Policy S15 (Biodiversity Net gain). Policy S15 seeks to exceed the statutory minimum of at least 10% from specific greenfield sites.</p>

<p>The site is close to a series of SNCI sites and development of the site (and other potential additional allocations) would cumulatively have significant adverse impacts through recreational pressure, disturbance, fragmentation, pests, lighting, air pollution and spread of non-native species.</p> <p>Concern about the lack of detailed habitat surveys and comprehensive biodiversity assessment which should be undertaken before allocation is considered.</p>	
<p><u>Pollution (air quality & noise)</u></p> <p>Concerns about environmental health with the Chalk pit waste facility causing pollution, dust and noise, and heavy vehicle movements.</p>	<p>The Submission Local Plan contains policy DM18 ensure that development does not exacerbate pollution or contamination and where possible, reduces it.</p>
<p><u>Infrastructure</u></p> <p>Concern that local infrastructure inclusion schools, GP surgeries, dentists, hospital services, roads, public transport, water supply, sewerage and electricity infrastructure are already under pressure and cannot absorb increased demands were the site to be allocated for over 500 homes.</p> <p>Concerns about the location of a school or SEND facility adjacent to the Chalk Pit / waste management facility.</p> <p>Improvements to utilities infrastructure (water and electricity) which are not funded or secured.</p>	<p>The impact on infrastructure from the potential additional sites has been assessed as part of the IDP Addendum (document reference COUD_032).</p>
<p><u>Heritage</u></p> <p>Beyond the site boundary there are conservation areas and nationally and locally listed buildings. Lack of consideration to the setting and historic character of the surrounding area, including Epsom College, Epsom Downs Racecourse, nearby conservation areas and the rural-</p>	<p>A Heritage Impact Assessment has been undertaken for the Downs Farm site (document reference COUD_029, pages 83 to 84). This identifies and considers the impact of the potential allocation on the significance of the</p>

<p>edge character of Longdown Lane and Reigate Road. Allocation of the site would be inconsistent with the existing conservation character and would undermine the historic setting.</p> <p>The area near Drift Bridge contains part of the Outer London Defence Line and that a pillbox or wartime fortification remains on or near the site, now covered by foliage and should be protected before any development is considered</p>	<p>heritage assets. Any future proposal would need to address heritage matters.</p>
<p><u>Flooding</u></p> <p>Concerns that developing the site will increase surface water runoff and increase flood risk beyond the site boundary, including along Reigate Road and at Drift Bridge.</p> <p>Concerns in relation to groundwater and aquifers. Need for a site specific Flood Risk Assessment and drainage strategy to be prepared.</p>	<p>The additional sites for potential allocation (Document reference COUD 29) on page 48 identifies that site is in Flood Zone 1 and a small proportion of the site is at risk of surface water flooding.</p> <p>The Submission Local Plan was supported by a Strategic Flood Risk Assessment (Level1) (document reference NE06). The site would not meet the criteria detailed in Section 3.1 (p9) of the Level 2 SFRA report (Document reference NE04) for a site-specific flood risk assessment to be undertaken.</p> <p>The submission Local Plan contains Policy S16 Flooding and Sustainable Drainage.</p>
<p><u>Landowner / Agent representation</u></p> <p>Welcome the updated conclusions in respect of the Site, which aligns with our commentary provided at Regulation 19 stage and through Hearing Statements.</p> <p>The Site presents a good opportunity for residential development in a suitable and sustainable location, which could help to significantly reduce the gap between housing needs and housing supply.</p>	<p>The Additional Sites for Potential Allocation Document (page 49) identifies that the site should be considered for potential allocation.</p> <p>The need for SEND provision is addressed in the Infrastructure Delivery Plan Addendum (document reference COUD 032, page 12). Surrey County Council has forecast the potential impact of the potential additional sites on the demand for specialist SEND provision. A new forecasting model has been used, which provides borough level forecasts</p>

<p>Good progress is already being made towards submission of a planning application for the Site with a Planning Performance Agreement (PPA) agreed with the Council in April 2026. The intention is for the application to be submitted in late Summer / early Autumn 2026, following community consultation commencing in June 2026. The application will be submitted in Outline with all matters reserved except for access.</p> <p>Land for SEND provision could potentially be secured on Site (partly in place of the public open space / green infrastructure area to the south of the Site) further information is required before this can be specifically allocated to Downs Farm. This is being explored with the Council and Surrey County Council.</p>	<p>rather than the previous 'quadrant level' which covered a wider geographic area. The quadrant forecasts were included in the September 2025 IDP update. The updated forecasts show there is a significant need for additional capacity for specialist SEND provision, and additional provision will be required to address this. The Education Authority advise that a larger single development may result in the need for land to be reserved for specialist provision, whereas more piecemeal development may require contributions towards expanding an existing establishment.</p>
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COUD_030 – Sustainability Appraisal Report Addendum

General comments	
Comments received:	EEBC response:
Questioning the purpose, framing and robustness of the Addendum, including whether the Inspector’s post-hearing letters have been interpreted too prescriptively as requiring additional allocations rather than a more robust reassessment of sites and alternatives. It is also stated that the Addendum is overly reliant on flawed underlying evidence and does not provide a sufficiently transparent or evidence-led basis for assessing reasonable alternatives.	<p>The SA addendum was prepared at the request of the Examining Inspector to inform consultation on potential additional sites for allocation in response to matters raised during the Examination Hearings.</p> <p>The SA addendum contains reasonable alternatives to reflect the latest evidence submitted following the Examination Hearings that concluded on the 9 October 2026.</p>
The range of growth scenarios and the progression of individual sites are not sufficiently robust, particularly where Green Belt sites are progressed despite environmental and infrastructure constraints, or where brownfield / urban alternatives are said not to have been fully exhausted. It is also stated that some omitted sites should have been tested more fully or in more refined scenarios.	The SA addendum explains the basis on which site options were progressed, ruled out, or tested through the reasonable alternative growth scenarios.
Site specific comments	
Comments received by site:	EEBC response:
<p>Downs Farm (NON016):</p> <p>The Addendum does not clearly explain why Downs Farm was not allocated earlier in the process but is now being progressed as a potential allocation; that although the Addendum acknowledges the site’s relatively poor accessibility, Green Belt harm and the potential for increased pressure on adjoining land, these factors do not appear to</p>	<p>The site featured in reasonable alternatives in the Sustainability Appraisal supporting the Regulation 18 Local Plan (document reference PV03) and Proposed Submission Local Plan (document reference SD05a). This is reflected in the SA Addendum which states on page 16 that NON016 (Downs Farm) – is a large site that was given close</p>

<p>materially alter the overall conclusions; and that biodiversity, landscape and community impacts are understated. It is also stated that the document relies too heavily on high-level qualitative judgement and scenario-based reasoning, without a sufficiently transparent evidenced explanation for why the site should now be taken forward.</p>	<p>consideration through the appraisal of reasonable growth scenarios in both 2023 and 2024. The site is progressed based on the updates to the Green Belt Topic Paper.</p>
<p><u>Landowner representation:</u></p> <p>Land promoter (Marrons obo Dandara, Rep 266) supports the Addendum and consider that it rectifies an earlier deficiency by properly testing higher-growth scenarios, including scenarios that incorporate Downs Farm. It is also considered that the Addendum supports progression of Growth Scenario 4 or 5, although the scoring for Communities and Landscape in relation to Downs Farm is said to be too negative.</p>	<p>Noted.</p>
<p>Priest Hill (NON013)</p> <p>SA understates the ecological sensitivity of Priest Hill, particularly given its relationship with the adjacent Priest Hill Nature Reserve / SNCI, including concerns about urban edge effects, recreational pressure, impacts on chalk grassland habitat and the adequacy of mitigation. The allocation should either be removed or substantially reduced, with development limited to the northern part of the site and separated from the reserve by a significant buffer.</p>	<p>The site's proximity to the adjoining nature reserve and the need to consider ecological effects is acknowledged. The Sustainability Appraisal published alongside the Proposed Submission Local Plan (document reference SD05a) noted the constraint in the form of an adjacent SNCI.</p> <p>The potential additional sites for allocation document proposes that the northern part of the site is used for residential and retail uses (4.9ha) and the retention of sports playing fields on land to the south of the site (3.7ha).</p> <p>The playing fields to the south of the site will form a buffer between built form to the north and the SNCI located to the south of the site.</p>

<p><u>Landowner representation:</u></p> <p>Land promoter (Carter Jonas obo Priest Hill Land Company, Rep 346) supports inclusion of Priest Hill within the growth scenarios and consider that the Addendum shows it to be a sustainable and deliverable strategic site in a highly accessible location next to Ewell East Station. The Addendum understates the site’s benefits under the Communities and Housing criteria.</p>	<p>Noted.</p>
<p>Land west of Burgh Heath Road (COL017)</p> <p>Concerns are raised regarding limited accessibility and community benefit, potential biodiversity value including possible chalk grassland and wildlife interest, effects on local amenity, safety and wellbeing, impacts on the wider historic environment, possible archaeological constraints affecting deliverability, the site’s role as an open landscape buffer, and the likelihood that development would increase reliance on private car travel.</p>	<p>The site featured in reasonable alternatives in the Sustainability Appraisal supporting the Regulation 18 Local Plan (document reference PV03) and Proposed Submission Local Plan (document reference SD05a).</p> <p>This is reflected in the SA addendum which states that a further consideration to the suitability of the site is that land adjacent to the south of COL017 is now under construction for a Racehorse Training Establishment and 46 residential apartments, and the effect of this development is to reduce the sensitivity of COL017 in landscape and Green Belt terms.</p>
<p>Omission site - Drift Bridge Farm (NON021)</p> <p><u>Landowner representation:</u></p> <p>Land promoter (Andrew Black obo Chartwell Land and New Homes 2 Limited, Rep 264) consider that the Addendum does not adequately justify ruling out Drift Bridge Farm, including because any in-combination impacts with Downs Farm are not clearly explained. It is</p>	<p>The SA Addendum explains the basis on which Drift Bridge Farm was ruled out on balance and sets out the reasonable alternative growth scenarios identified at this stage of the Examination.</p>

<p>also considered that the range of growth scenarios tested is too narrow and does not robustly assess alternatives for meeting housing need.</p>	
<p>Omission site - Land near Downs Road east (COL023)</p> <p><u>Landowner representation:</u></p> <p>Land promoter (Savills obo Atkins Properties, Rep 252) consider that the original SA and the Addendum should be read together, and that they recognise the relevance of COL023 and its associated green infrastructure / biodiversity land. The SA Addendum gives insufficient weight to COL023, as it is only tested in the highest growth scenario, despite the site’s potential to deliver housing, affordable housing, biodiversity enhancement, public access and compensatory Green Belt improvements.</p>	<p>The SA Addendum explains the basis on which site options were taken forward to the growth scenarios and the basis on which growth scenarios were selected for appraisal.</p>
<p>Omission site - Land east of Burgh Heath Road (COL019)</p> <p><u>Landowner representation:</u></p> <p>Land promoter (Neame Sutton obo Wates, Rep 143) consider that the SA reveals inconsistencies in the treatment of COL019 compared with COL017, and that the SA’s own analysis of Scenario 6 supports inclusion of COL019. It is considered that where Scenario 6 performs less well, the site-specific commentary on COL019 still shows the site to be acceptable and capable of mitigation.</p>	<p>The Addendum appraises the six reasonable growth scenarios as packages of sites and sets out the basis on which site options were progressed, or not progressed, for testing.</p>

COUD_031 – Habitats Regulations Assessment - Addendum

General comments	
General Comments:	EEBC Response:
<p>Concern about indirect effects on European and nationally designated sites (e.g. SACs, SSSIs, chalk streams).</p> <p>Concerns about the narrow scope of the document and that it only focuses on European sites and does not consider local biodiversity designations, recreational pressure concerns or the Green Belts ecological function.</p> <p>Habitats will be affected which will negate any successful efforts of the Woodland Trust in their biodiversity plan.</p>	<p>The HRA is focussed on designated European sites, being undertaken in accordance with the Habitats Regulations, Planning Practice Guidance and Habitats Regulations Handbook.</p>
<p>The document tests Scenario 5 in the HRA and not the higher scenario demonstrating the staged and partial nature of the environmental work. HRA does not adequately address the cumulative impacts of the overall plan and additional site allocations.</p>	<p>The HRA addendum assesses the potential increase in development above what was contained in the Local Plan Submission document on the designated European sites.</p>
<p>Concern that the document relies heavily on forecasts and assumptions about traffic growth, recreational behaviour, water use and effectiveness of mitigation measures. Uncertainty remains in the long term.</p>	<p>The HRA addendum has been informed by forecasts to enable predictions to be made as to future cumulative environmental impacts. The updated transport modelling takes into consideration the cumulative impact of allocations identified within the Submission Local Plan document and the potential additional site allocations.</p>
<p>Wider concerns relating to flood risk, drainage and runoff, pollution (air, noise and light), traffic congestion and infrastructure capacity.</p>	<p>Concerns noted, although no adverse impacts on the integrity of the assessed European sites due to a change in air quality, water quality or</p>

	an increase in recreational pressure were identified in the HRA addendum.
Implausible traffic impact – the appendix to the HRA highlights this. Work is required on the Transport Assessment to ensure the results are logical.	The appendix within the HRA addendum, which provides a response from Logika Group (Air Quality Modelling consultants) states “While there is no plausible reason to expect the new allocations to reduce traffic on the B2032, there is also no plausible reason to expect a significant increase. The effect on the relevant section of the B2032 is therefore essentially neutral.”

Site Specific Comments

Comments Received by site:	EEBC Response:
<p><u>Downs Farm</u></p> <p>The focus of the document is too narrow and does not sufficiently address the ecological sensitivity of the site.</p>	<p>The HRA is focussed on designated European sites, being undertaken in accordance with the Habitats Regulations, Planning Practice Guidance and Habitats Regulations Handbook.</p>
<p>Air Quality assessment does not consider local roads that will be affected from additional development (e.g. A240).</p>	<p>The air quality assessment related to a particular European Site, the Mole Gap to Reigate Escarpment, rather than the local highway network.</p>
<p>Consider conclusions in relation to water and wastewater are high level and not site specific relying on the regulatory framework and Local Plan policy wording to conclude no European-site harm from water quantity.</p> <p>Conducts the IDP which acknowledges sewage treatment capacity constraints.</p>	<p>The conclusions on the HRA are focussed on designated European sites. Thames Water are aware of the capacity issue and anticipate delivering an upgrade to the sewage treatment works during the local plan period.</p>

COUD_032 – Infrastructure Delivery Plan - Addendum

General comments	
<p><u>Delivery, evidence and infrastructure planning</u></p> <p>IDP addendum is too high level and strategic. Lacks site specific detail, funding commitments, delivery mechanisms, and phasing and timing clarity.</p> <p>Heavily relies on future engagement, funding and mitigation. Risk of developments proceeding ahead of infrastructure provision. Concerns that the cumulative impacts of development have not been fully assessed.</p> <p>Inconsistencies and inaccuracies across the evidence. Full responses from key stakeholders (TfL, Network Rail, Surrey CC) have not been published.</p>	<p>The purpose of the IDP addendum was to consider the impact on the borough’s infrastructure if additional sites were to be allocated within the Local Plan. The impact of delivering approximately 1,000 additional dwellings was considered, as this is reflective of the capacity of the potential additional sites which had not been discounted when the addendum was prepared.</p> <p>It is a strategic assessment, and should any additional sites be allocated within the Local Plan through the Inspectors Main Modifications, then the Council will work with developers and infrastructure providers to ensure appropriate infrastructure provision is made.</p>
<p><u>Transport (Highways, Public Transport and Access)</u></p> <p>Concerns that the road networks are already heavily congested with lengthy queues and peak time grid lock.</p> <p>Poor road conditions (e.g. potholes and narrow pavements). Development will generate significant additional traffic and congestion, exacerbating road safety risks.</p> <p>Public transport is infrequent, unreliable and overcrowded and misrepresented in evidence. Bus network capacity issues. Poor connectivity for walking/cycling.</p>	<p>As stated in the Transport Assessment Addendum (document reference COUD_033a, page 68), “overall the Local Plan sites are mostly reasonable small and/or well located in relation to existing transport connections and amenities. As a result, the highways impacts tend to be local to the development sites themselves and the cumulative impact is in general tolerable. There is a need for localised mitigation tied in with specific development sites as well as schemes to address cumulative impacts.”</p> <p>Should any additional sites be allocated through the Inspectors Main Modifications to the Submission Local Plan, the Council will work with</p>

<p>No certainty that transport mitigation (junction upgrades, bus improvements, active travel links) will be delivered or are feasible.</p>	<p>Surrey County Council and other relevant infrastructure providers to deliver appropriate mitigation.</p>
<p><u>Healthcare (GPs, hospitals, dentists)</u></p> <p>Concern that health services are already at or beyond capacity. Development is expected to significantly increase demand across primary and acute care. Need for new GP practices and healthcare.</p> <p>Only partial funding identified.</p> <p>Concern that no response was received from Epsom and St Helier University Hospitals Trust and therefore infrastructure needs on healthcare are incomplete.</p> <p>Aging hospital estate. Capacity will worsen with growth. No clearly identified, funded or deliverable healthcare expansion.</p>	<p>In terms of primary healthcare provision, the response from the Surrey Heartlands Integrated Care Board (ICB) stated “The impact of additional new housing, delivered over the local plan period, will result in a requirement for additional healthcare floorspace. Additional provision could be delivered through increasing capacity at existing facilities or, where appropriate, building new facilities.”</p> <p>The Council and the NHS Surrey and Sussex ICB will continue to engage to ensure the impact on primary healthcare is addressed appropriately.</p> <p>Epsom & St Helier University Hospitals Trust were consulted but no response was received.</p>
<p><u>Education (Schools & SEND provision)</u></p> <p>Concern about education capacity and deficits in school places over time. IDP significantly underestimates demand from new housing. Shows declining pupil numbers despite housing growth.</p> <p>Existing schools are already oversubscribed with a reliance on temporary ‘bulge’ classes.</p> <p>For secondary schools a shortfall of places from 2027 onwards is identified.</p>	<p>The education forecasts show that while the potential additional allocation sites will yield additional primary age children there is still a surplus of primary school places across the forecast period.</p> <p>For secondary provision there is an initial challenge to capacity, which the education authority advise could be met through temporary bulge provision in existing schools. There is then a surplus of places by 2031-32.</p>

<p>Substantial existing and future deficits in SEND provision with no funded or deliverable solution.</p> <p>Early years/childcare – lack of provision.</p> <p>Post 16 education – no assessment of further education or training needs.</p> <p>Council conclusions that there is no need for a new primary school contradicts the evidence.</p>	<p>With regards to SEND provision, a significant need has been identified which will require additional provision. Should any additional sites be allocated through Main Modifications to the Submission Local Plan, the Council will work with Surrey County Council as the education authority to identify opportunities for provision to help meet the identified need.</p>
<p><u>Utilities (Water, wastewater, energy)</u></p> <p>Water/wastewater - Need to protect groundwater sources (SPZs) and manage contamination risks.</p> <p>Existing sewers are already at or beyond capacity. Reports of discharges into watercourses (e.g. Hogsmill). Need for upgrades.</p> <p>Thames Water region is classified as ‘seriously water stressed’.</p> <p>Electricity - IDP identifies declining spare capacity and future deficits. Uncertainties around timing and reinforcement.</p> <p>Telecommunications – capacity (not just coverage) is inadequate.</p> <p>Existing network overload in places e.g. Epsom Town Centre.</p>	<p>With regards to wastewater, in response to the IDP Addendum Thames Water have stated they are aware of capacity constraints at the STW serving the area and anticipate delivering an upgrade during the local plan period but do not envisage a significant issue with supporting the increased levels of growth.</p> <p>SES Water supplies water to part of the borough and have identified through their response to the IDP Addendum that the potential allocations at Downs Farm and Priest Hill are likely to require a reinforcement scheme. The developers are encouraged to engage with SES Water should these sites be allocated through the Inspectors main modifications to the Local Plan, to ensure any reinforcements can be delivered in a timely manner.</p> <p>UK Power Networks (electricity) have stated that when a network connection request is made by a developer a full network assessment is undertaken to identify any upgrades which may be required to ensure the capacity of the infrastructure is not exceeded.</p>

<p><u>Drainage & Flood Risk</u></p> <p>Sites are generally located outside high fluvial flood risk areas. Concerns about existing flooding issues and that surface water flooding not adequately addressed.</p> <p>Sequential test has not been properly applied. Flood risk not evidenced in site selection.</p> <p>Loss of Green Belt permeability will increase run off.</p> <p>Detailed site-specific flood risk and drainage strategies needed.</p>	<p>Policy S16 in the Submission Local Plan relates to flood risk and sustainable drainage.</p> <p>The Submission Local Plan was supported by a Strategic Flood Risk Assessment (Level1) (Document). Level 2 Site Specific Flood Risk Assessments were undertaken (Document references NE04 and NE05) for those sites contained within the Submission Local Plan where the criteria in Section 3.1 (p9) of the Level 2 SFRA report (Document reference NE04) were met. In addition, a Sequential Test was prepared to support the submission Local Plan (Document reference NE03) and flood risk has been considered through the site assessment methodology (Document Reference HB05).</p>
<p><u>Community facilities & recreation</u></p> <p>Development will put pressure on community services and recreational infrastructure. No plan to address this.</p> <p>Green Belt land provides essential community and wellbeing infrastructure.</p> <p>Insufficient sports facilities already. Only partial mitigation identified (Hook Road Arena).</p>	<p>The impact on infrastructure of an increased population through new housing development is recognised and appropriate contributions via Section 106 and CIL will be sought.</p>
<p><u>Emergency services</u></p> <p>Police – population growth will increase demand. Identified funding pressures and resource constraints. No quantification of additional demands or costs.</p> <p>Fire & Rescue – Performance concerns and resource challenges.</p>	<p>The impact on infrastructure of an increased population through new housing development is recognised and appropriate contributions via Section 106 agreement and CIL will be sought.</p>

<p>'Requires improvement' ratings in several areas. Increased development will increase traffic and slow response times.</p> <p>Ambulance – Identified need for a new ambulance post but no plan or site identified.</p> <p>Limited emergency service capacity, which is not fully assessed or planned.</p>	
<p><u>Environmental infrastructure (water and natural systems)</u></p> <p>Need for up-to-date environmental evidence & protection of groundwater and water quality.</p> <p>Concerns about impact on chalk streams and sensitive water environments.</p> <p>Cumulative effect of development on groundwater abstraction and pollution risk.</p> <p>Loss of up to 100 hectares of green space.</p> <p>Habitat fragmentation. No mitigation to offset losses.</p>	<p>The Submission Local Plan contains policy DM18 ensure that development does not exacerbate pollution or contamination and where possible, reduces it.</p> <p>The Submission Local Plan contains Policy S14 (Biodiversity and Geodiversity) and Policy S15 (Biodiversity Net gain). Policy S15 seeks to exceed the statutory minimum of at least 10% from specific greenfield sites.</p> <p>Groundwater abstraction licencing is managed by the Environment Agency.</p>

Site Specific Comments	
Comments Received by site:	EEBC Response:
<p>Downs Farm (NON016)</p> <p><u>Transport (Highways, Public Transport and Access)</u></p> <p>Concerns that the local road network is already at or beyond capacity, particularly: Reigate Road (A240), Longdown Lane North/South, Ewell Bypass, Drift Bridge junction.</p> <p>Safety concerns including difficult junctions and recorded accidents.</p> <p>Site will have increased car dependency due to poor public transport accessibility, which will generate more traffic than has been assessed.</p> <p>Bus service (166) is infrequent and inaccurately described in evidence.</p> <p>Pressure on parking near stations and local centres.</p> <p>Increased traffic will slow emergency vehicle response times.</p> <p>Lack of clarity on funded/deliverable highways improvements – mitigation measures are opportunities as opposed to committed schemes.</p>	<p>Should the Downs Farm site be allocated through the Inspectors main modifications to the Submission Local Plan, the Council will work with Surrey County Council (as the Highways Authority), TFL as the operator of the 166-bus route and the developer to identify and deliver appropriate transport mitigation.</p>
<p><u>Healthcare (GPs, hospitals, dentists)</u></p>	

<p>Local healthcare services are already overstretched – difficulties in obtaining GP/dentist appointments, pressure on Epsom hospital and A&E waiting times.</p> <p>No clear evidence of additional capacity being funded or planned.</p>	<p>Should the Downs Farm site be allocated through the Inspectors main modifications to the Submission Local Plan, the Council will work with the NHS Surrey and Sussex ICB to ensure the impact of the development on primary healthcare is addressed appropriately.</p>
<p><u>Education (Schools & SEND provision)</u></p> <p>Concerns about existing school capacity pressures, particularly for secondary and SEND provision.</p> <p>No clear evidence of additional capacity being funded or planned.</p>	<p>Should the Downs Farm site be allocated through the Inspectors main modifications to the Submission Local Plan, the Council will work with Surrey County Council as the education authority and the developer to mitigate any impact on primary/secondary education and to address the need for additional SEND provision.</p>
<p><u>Utilities (Water, wastewater, energy)</u></p> <p>IDP addendum has acknowledged constraints in water supply and wastewater/sewerage infrastructure.</p> <p>Pressure on electricity networks.</p> <p>No clear evidence of additional capacity being funded or planned.</p>	<p>SES Water have identified that Downs Farm is likely to require a reinforcement scheme. The developers are encouraged to engage with SES Water should the Downs Farm site be allocated through the Inspectors main modifications to the Local Plan, to ensure any reinforcements can be delivered in a timely manner.</p> <p>UK Power Networks (electricity) have stated that when a network connection request is made by a developer a full network assessment is undertaken to identify any upgrades which may be required to ensure the capacity of the infrastructure is not exceeded.</p>
<p><u>Drainage & Flood Risk</u></p> <p>Existing surface water flooding issues, particularly on Reigate Road.</p>	<p>The additional sites for potential allocation (Document reference Coud 29) on page 48 identifies that site is in Flood Zone and a small proportion of the site is at risk of surface water flooding.</p>

<p>Increased hard surfacing and loss of permeable greenfield land will exacerbate flooding.</p> <p>Lack of site specific flood risk/hydrological assessment – flooding/drainage issues insufficiently assessed.</p>	<p>The Submission Local Plan was supported by a Strategic Flood Risk Assessment (Level1) (document reference NE06). The site would not meet the criteria detailed in Section 3.1 (p9) of the Level 2 SFRA report (Document reference NE04) for a site-specific flood risk assessment to be undertaken.</p> <p>The submission Local Plan contains Policy S16 Flooding and Sustainable Drainage.</p>
<p><u>Community facilities & recreation</u></p> <p>Development will increase the demand for open space, while losing Downs Farm open space.</p> <p>Loss of green space will have mental health/wellbeing impacts.</p>	<p>There are no public rights of way across the site.</p> <p>Submission Local Plan Policy DM19 – Open Space, Sport and Recreation states that on-site provision of open space should be made in accordance with the Fields in Trust benchmark standard set out below (or any future equivalent standard) and that the council will negotiate on a site-by-site basis the type of open space provision where other typologies may be more appropriate or desirable having regard to the most up to date Open Space Audit.</p>
<p><u>Pollution (air quality & noise)</u></p> <p>Existing issues with the Chalk pit waste facility causing pollution, dust and noise.</p> <p>Development will increase air pollution and traffic emissions.</p> <p>Siting housing or schools near potentially hazardous uses.</p>	<p>The Submission Local Plan contains policy DM18 ensure that development does not exacerbate pollution or contamination and where possible, reduces it.</p>
<p><u>Green infrastructure</u></p>	

<p>Loss of wildlife habitat – site is well used by deer, bats, birds etc...</p> <p>Loss will remove part of the existing ecological network/green corridor.</p>	<p>The Submission Local Plan contains Policy S14 (Biodiversity and Geodiversity) and Policy S15 (Biodiversity Net gain). Policy S15 seeks to exceed the statutory minimum of at least 10% from specific greenfield sites. This would apply should the site be allocated through a main modification to the plan.</p>
<p>Land at Priest Hill (NON013)</p> <p><u>Transport (Highways, Public Transport and Access)</u></p> <p>Concerns that local road networks are already congested and constrained, particularly Cheam Road, Banstead Road and Reigate Road, including the Holmwood Road and Queensmead Avenue which are used as cut throughs.</p> <p>Severe peak congestion and gridlock.</p> <p>Increased development in this area will increase the risk of accidents. Public transport is limited: trains serving Ewell East station are infrequent and at capacity, while bus provision is a single route.</p> <p>Development at Priest Hill will increase parking pressure in the locality.</p>	<p>The site is considered to be in a sustainable location given its proximity to Ewell East railway station, the amenities within Ewell Village and the potential for local convenience retail on the site.</p> <p>Should the site be allocated within the Local Plan through the Inspectors Main Modifications, the Council will work with Surrey County Council and other relevant infrastructure providers to deliver appropriate mitigation including improvements to pedestrian and cycle connectivity.</p>
<p><u>Healthcare (GPs, hospitals, dentists)</u></p> <p>Local healthcare services are already at capacity – difficulties in obtaining GP/dentist appointments, pressure on Epsom hospital and A&E waiting times.</p> <p>No clear evidence of additional capacity being funded or planned.</p>	<p>Should the Priest Hill site be allocated through the Inspectors main modifications to the Submission Local Plan, the Council will work with the NHS Surrey and Sussex ICB to ensure the impact of the development on primary healthcare is addressed appropriately.</p>

<p><u>Education (Schools & SEND provision)</u></p> <p>Concerns about existing primary and secondary school capacity pressures – lack of available spaces for existing residents with new development exacerbating this.</p> <p>No clear evidence of additional capacity being funded or planned.</p>	<p>Should the Priest Hill site be allocated through the Inspectors main modifications to the Local Plan, the Council will work with Surrey County Council as the education authority and the developer to mitigate any impact on primary/secondary education and to address the need for additional SEND provision.</p>
<p><u>Utilities (Water, wastewater, energy)</u></p> <p>Concerns that water supply, sewerage systems and electricity networks are already constrained. New development in this location will make this worse.</p> <p>No clear evidence of additional capacity being funded or planned.</p>	<p>SES Water have identified that Priest Hill is likely to require a reinforcement scheme. The developers are encouraged to engage with SES Water should the site be allocated through the Inspectors main modifications to the Local Plan, to ensure any reinforcements can be delivered in a timely manner.</p>
<p><u>Drainage & Flood Risk</u></p> <p>Concerns about surface water flooding, particularly near roads, railway bridges and low lying areas such as Cheam Road underpass.</p> <p>Development will make this worse due to loss of permeable Green Belt land. Potential risk of property flooding/road safety (due to water accumulation).</p> <p>Lack of detailed drainage strategy or mitigation measures.</p>	<p>The additional sites for potential allocation (Document reference Coud_29) on page 45 identifies that site is in Flood Zone 1 and a small proportion of the site is at risk of surface water flooding.</p> <p>The Submission Local Plan was supported by a Strategic Flood Risk Assessment (Level1) (document reference NE06). The site would not meet the criteria detailed in Section 3.1 (p9) of the Level 2 SFRA report (Document reference NE04) for a site-specific flood risk assessment to be undertaken.</p> <p>The submission Local Plan contains Policy S16 Flooding and Sustainable Drainage. This would apply should the site be allocated through a main modification to the plan.</p>

<p><u>Community facilities & recreation</u></p> <p>Responses highlight the importance of Priest Hill as recreational land with the playing fields being actively used for sports (rugby/football), dog walking and informal leisure.</p> <p>Existing evidence (Playing Pitch Strategy & Sports Facilities Assessment) show a shortage of sports provision in the borough. Losing this open space will reduce opportunities for physical activity and negatively impact on community well being.</p> <p>No clear strategy to replace or re-provide these facilities.</p>	<p>The additional sites for potential allocation (Document reference COUD_29) on page 46 concludes that should the site be allocated through main modifications to the Submission Local Plan, the 3.7ha southern part of the site that is in current use by a local sports club should be retained as playing fields. This approach is evidenced by the position statement produced following the Examination Hearings (Document reference COUD_024).</p> <p>The Council acknowledges the shortage of sports provision in the borough and the lack of ‘secured’ provision (provision which secures its long-term use through community use agreements) and is seeking to address this.</p>
<p><u>Pollution (air quality & noise)</u></p> <p>Development will increase air pollution, traffic emissions and noise levels.</p> <p>Potential effects on respiratory health and vulnerable groups. Reduction in overall quality of life.</p>	<p>The Proposed Local Plan contains policy DM18 ensure that development does not exacerbate pollution or contamination and where possible, reduces it.</p>
<p><u>Green infrastructure</u></p> <p>Loss of recreation opportunities, biodiversity habitats such as chalk grassland and protected habitats. Development will have a detrimental impact on wildlife.</p>	<p>The Submission Local Plan contains Policy S14 (Biodiversity and Geodiversity) and Policy S15 (Biodiversity Net gain). Policy S15 seeks to exceed the statutory minimum of at least 10% from specific greenfield sites.</p>

<p><u>Land West of Burgh Heath Road (COL017)</u></p> <p><u>Transport (Highways, Public Transport and Access)</u></p> <p>Concerns regarding very poor site accessibility. Low accessibility score (ranked 181 out of 191 sites).</p> <p>Limited public transport: infrequent weekday only bus service and railway stations located 25-26 minutes' walk away.</p> <p>Development will have a high car dependency.</p> <p>Lack of a detailed transport assessment and mitigation.</p> <p>Poor walking and cycling environment.</p>	<p>The site does perform relatively poorly compared to other Green Belt sites, however it adjoins the urban area and there is an infrequent bus service that operates in the local area.</p> <p>There may be opportunity to improve accessibility to the site by non-car modes, such as improvements to pavements and connectivity to the public right of way beyond the site boundary.</p>
<p><u>Healthcare (GPs, hospitals, dentists)</u></p> <p>No evidence provided on the capacity of local GP services or healthcare infrastructure.</p> <p>New development will increase pressure on services – no confirmed mitigation.</p>	<p>Should the site be allocated through the Inspectors main modifications to the Submission Local Plan, the Council will work with the NHS Surrey and Sussex ICB to ensure the impact of the development on primary healthcare is addressed appropriately.</p>
<p><u>Education</u></p> <p>Lack of site specific evidence on school capacity.</p>	<p>Should the site be allocated through the Inspectors main modifications to the Local Plan, the Council will work with Surrey County Council as the education authority and the developer to mitigate any impact on</p>

<p>Concern that the cumulative impact of developments has not been assessed.</p>	<p>primary/secondary education and to address the need for additional SEND provision.</p>
<p><u>Utilities (Water, wastewater, energy)</u></p> <p>IDP assessment is too high level and borough wide. No evidence of capacity assessments or provider commitments.</p>	<p>With regards to wastewater, Thames Water have stated they are aware of capacity constraints at the STW serving the area and anticipate delivering an upgrade during the local plan period but do not envisage a significant issue with supporting the increased levels of growth.</p> <p>UK Power Networks (electricity) have stated that when a network connection request is made by a developer a full network assessment is undertaken to identify any upgrades which may be required to ensure the capacity of the infrastructure is not exceeded.</p>
<p><u>Drainage & Flood Risk</u></p> <p>No site level assessment. Area is already being developed (South Hatch development not yet fully occupied) being baseline conditions are not certain.</p>	<p>The additional sites for potential allocation (Document reference COUD_029) on page 37 identifies that the site is in Flood Zone 1 and there is no risk of surface water flooding.</p> <p>The Submission Local Plan was supported by a Strategic Flood Risk Assessment (Level1) (document reference NE06). The site would not meet the criteria detailed in Section 3.1 (p9) of the Level 2 SFRA report (Document reference NE04) for a site-specific flood risk assessment to be undertaken.</p> <p>The submission Local Plan contains Policy S16 Flooding and Sustainable Drainage.</p>

COUD_033a – Transport Assessment - Addendum

General comments	
Comments Received:	EEBC Response:
<p>Reliance on 2019 base year of the model – concern this may not reflect current conditions on the network.</p> <p>Relies on strategic modelling which explicitly acknowledges limitations in accurately representing individual journeys, junction-level impacts and real-world behaviour (Results and Analysis Caveats).</p>	<p>Surrey County Council as the Highways Authority have produced the Transport Assessment Addendum to assess the potential impact of the allocation site options using the County’s strategic transport model SINTRAM.</p> <p>Page 5 of the document states that ‘The strategic transport model has not been adjusted for Covid-19.... the impacts can be considered worst case as a result of the underlying vehicle demand being higher than is likely to be the case in 2040’.</p>
<p>The conclusions rely heavily on modelled outputs rather than observed conditions. The modelling shows increases in vehicle trips, increased travel times and reduced speeds, yet still concludes that impacts are acceptable.</p>	<p>Surrey County Council as the Highways Authority have concluded on page 68 of the document that:</p> <ul style="list-style-type: none"> ▪ Overall, the Local Plan sites are mostly reasonably small and/or well located in relation to existing transport connections and amenities. As a result, the highway impacts tend to be local to the development sites themselves and the cumulative impact is in general tolerable. ▪ It is not considered that any impacts would be considered severe in terms of the National Planning Policy Framework (NPPF). ▪ There is a need for localised mitigation tied in with specified development sites as well as schemes to address cumulative impacts...

<p>The document notes that modelled mode shares do not assess the quality of walk, cycle, public transport or vehicle routes, only time and distance.</p> <p>The report does not take account of whether people would actually walk, cycle, or use public transport because it is poor quality, inconvenient, uncomfortable, dangerous or unreliable, or through force of habit.</p> <p>The mode shares set out in the report (for all sites away from the town centre) are likely to significantly overstate public transport and active travel modes and understate car use.</p> <p>The Local Plan development would materially increase pressure on the transport network with increases in total vehicle distance and travel time.</p>	<p>The Surrey Local Transport Plan 4 detailed the Highways Authorities sets out the ambition to transform Surrey’s transport network up to 2032 including increased use of public transport, walking and cycling. Further detail on LTP4 and the Local Cycling and Walking Infrastructure Plan can be found on pages 68 and 69 of the report.</p>
<p>Table 1 states 5,327 dwellings which does not align with the delivery trajectory set out in Section 4 of the Additional Sites for Potential Allocation, difference of 800 dwellings.</p>	<p>Table 1 only includes sites allocations in the submission Local Plan and the potential additional site allocations in addition to windfalls.</p> <p>It does not include completions which feature on the Local Plan trajectory of the Additional Sites for Potential Allocation.</p>
<p>The proposed allocations should not proceed unless there is clear evidence that necessary transport improvements will be delivered before occupation, not simply investigated later.</p> <p>The infrastructure evidence is incomplete, uncoded, and in several cases speculative. Without demonstrable deliverability, the proposed site allocations cannot be considered sound.</p>	<p>A detailed site specific transport assessment will be required to support any future planning applications at the sites in accordance with Submission Local Plan Policy S19 ‘Transport’.</p>

Surrey County Council officers have been actively involved in the production of the Transport Assessment.	Noted
National Highways does not have any significant concerns in relation to the impact of the total development considered in this new assessment.	Noted

Site Specific Comments	
Comments Received by site:	EEBC Response:
<p>Downs Farm</p> <p>Concern that the site would be car-dependent (65-68% car mode share) and that the transport assessment relies on uncertain mitigation, including improved access to Epsom downs station and bus service improvements.</p> <p>Development would generate substantial additional traffic movements and increase pressure on the local highway corridor (Reigate Road) which is already heavily congested.</p> <p>Longdown Lane North and Reigate Road are identified as hotspots in the study with breakdown in flow predicted at peak times.</p> <p>Concerned that mitigation (e.g. bus service diversion) is not secured and largely conceptual.</p> <p>Concern about safety of surrounding roads for increased active travel (pedestrian / cycle use).</p>	<p>Should the site be allocated through the Inspectors main modifications to the Submission Local Plan, the Council will work with Surrey County Council (as the Highways Authority), TFL as the operator of the 166-bus route and the developer to identify and deliver appropriate transport mitigation.</p>

<p>Concern that modelling does not consider cumulative impacts of other development in the corridor and that these cumulative impacts cannot be mitigated.</p> <p>Surrey County Council Report entitled "A240 Reigate Road, Ewell – Change of Speed Limit" identified the A240 Reigate Road as having "one of the worst road safety records in the County" and this should be afforded significant weight.</p> <p>The Highways Authority (SCC) note that a correction is required to page 36 of the Transport Assessment Addendum (COUD 033a) as the frequency of the TfL bus service 166 is hourly at this location (and not three times per hour as reported, which reflect services between Banstead and West Croydon only). As a result, improved frequency should also be sought, together with the recommendation to connect the 166 service directly to the site.</p>	<p>The Transport Assessment has been undertaken as a strategic transport model and therefore considers the cumulative impacts of development contained with the submission local plan in addition to the potential site allocations.</p> <p>Pages 36-38 of the Transport Assessment provide commentary on the potential impacts of the site on the highway network in the AM and PM peaks.</p> <p>A detailed site-specific transport assessment will be required to support any future planning application at the site in accordance with Submission Local Plan Policy S19 'Transport'.</p> <p>Noted. The Additional Sites for Potential Allocation document (COUD_29) correctly identifies that 166 (Epsom to Croydon) service operates on an hourly frequency Monday to Friday. The same document identifies the opportunity to divert the bus service to serve the site.</p>
<p>Land West of Burgh Heath Road</p> <p>Concerns that the site scores poorly in accessibility terms, there will be unsafe walking conditions for future residents and poor public transport.</p>	<p>Should the site be allocated through the Inspectors main modifications to the Submission Local Plan, the Council will work with Surrey County Council (as the Highways Authority) and the developer to identify and deliver appropriate transport mitigation.</p> <p>The South Hatch scheme is a commitment that is currently under construction and has been factored into the transport modelling.</p>

<p>Concerns about the cumulative impact of traffic when taking into account the adjoining South Hatch scheme that is under construction.</p> <p>The report does not adequately account for traffic generated when the adjoining South Hatch scheme is fully completed.</p> <p>The Transport Assessment does not provide sufficiently fine-grained analysis of the site-specific impacts of 50 dwellings.</p> <p>The document notes that modelled mode shares do not assess the quality of walk, cycle, public transport or vehicle routes, only time and distance.</p>	<p>The model is a strategic highways model and does not provide a detailed analysis of all sites, only the larger strategic allocations.</p> <p>A detailed site-specific transport assessment will be required to support any future planning application at the site in accordance with Submission Local Plan Policy S19 'Transport'.</p>
<p>Priest Hill</p> <p>Consider that the transport modelling does not fully capture the severe congestion in the local area during morning and evening peaks.</p> <p>The site is forecast to be car-dominated, despite its proximity to Ewell East, with poor pedestrian and cycle connectivity along the Cheam Road corridor and severance at the A24 junction.</p> <p>Cheam Road cannot simply be widened and therefore has no capacity to absorb additional traffic.</p>	<p>Should the site be allocated through the Inspectors main modifications to the Submission Local Plan, the Council will work with Surrey County Council (as the Highways Authority) and the developer to identify and deliver appropriate transport mitigation.</p>
<p>Given the acknowledged limitations of the modelling and the absence of detailed junction-level analysis, the conclusions do not provide a robust basis for supporting the allocation of this site.</p>	<p>Pages 34-36 of the transport assessment provides commentary on the potential impacts of the site on the highway network in the AM and PM peaks.</p> <p>A detailed site-specific transport assessment will be required to support any future planning application at the site in accordance with Submission Local Plan Policy S19 'Transport'.</p>

COUD_033b – Transport Assessment Technical Annex

General comments	
Comments Received:	EEBC Response:
<p>Critique of methodology and reliability of the strategic model.</p> <p>Consider there to be discrepancies between observed and modelled flows and question the realism of public transport usage assumptions.</p> <p>Out of date traffic counts (2019 data) - model validated against data that is significantly out-of-date and may be unrepresentative / underestimate actual traffic flows.</p> <p>The model is an approximation of real-world conditions rather than a precise representation of existing traffic patterns.</p>	<p>The Strategic Transport Assessment has been produced by the Highway Authority (Surrey County Council) on behalf of Epsom and Ewell Borough Council.</p> <p>The local model used for the assessment is derived from Surrey County Council's (SCC) regional, multi-modal SINTRAM transport model.</p>
<p>Table 10 of page 44 – job data indicates a net increase of 1,058 jobs over the plan period. It is unclear how these have been calculated.</p>	<p>The jobs forecasts are based on conversion of floorspace using standard metrics.</p>
<p>Table 4 on page 28 - analysis does not meet the recommended thresholds set by the government for the data to be deemed reliable.</p> <p>Table 5 - the model does not fully achieve the Department for Transport's desired validation standards observed AM and PM movements are both below the DfT's desired threshold of 85%.</p>	<p>Under table 4 on page 28 the report states that 'although the percentage change is in excess of the TAG criteria of 5% for both mean and standard deviation in the AM and PM, the absolute differences are low'.</p> <p>Under Table 5 on page 32, the report states that 'both the AM and PM peak hours, the GEH statistics are close to meeting the TAG desired acceptance level of 85%...'</p>
<p>Document acknowledges that detailed transport assessments will be required at planning application stage.</p>	<p>The model is a strategic model assessing the cumulative impacts of Local Plan development. It is not intended to replace more detailed site-</p>

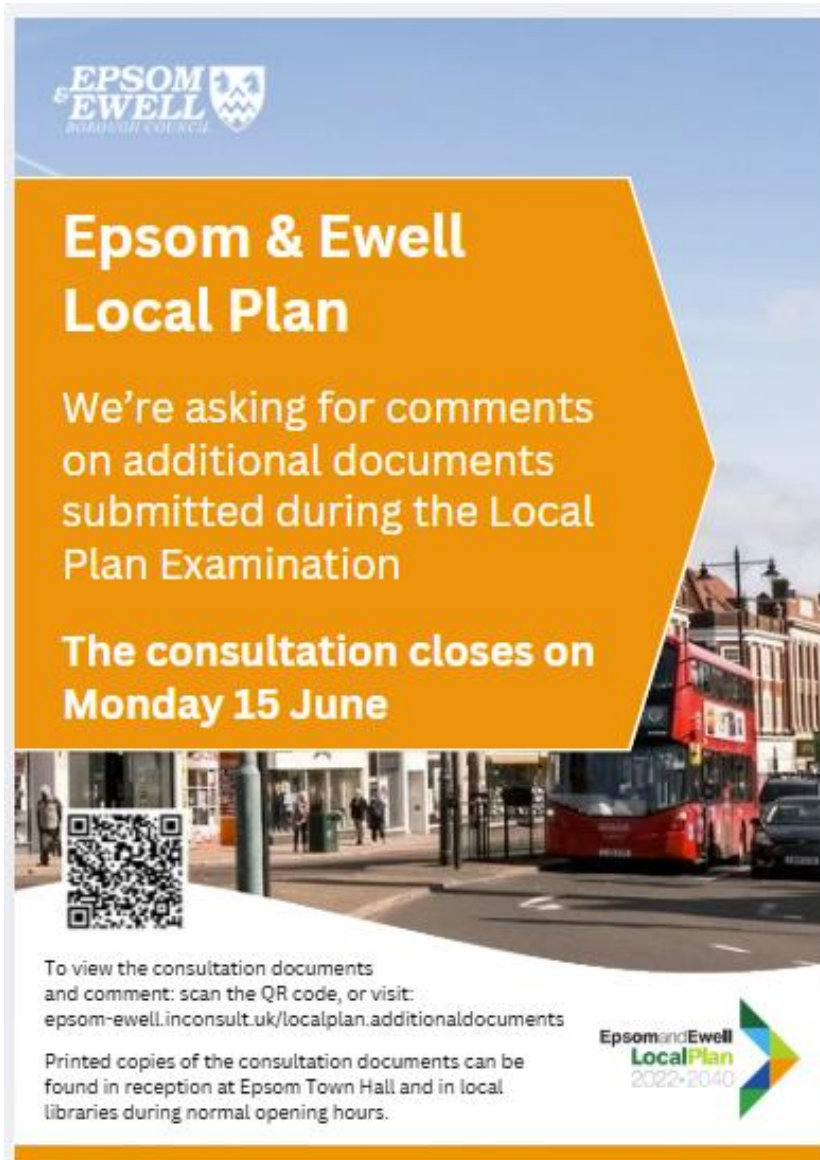
	specific transport assessments required to support planning applications.
The revision of Horton Farm to 1,300 dwellings represents a positive and proportionate refinement of the transport evidence base, as it aligns the modelled quantum more closely with the Local Plan allocation of approximately 1,250 homes.	Noted

Other comments received that do not relate to the documents subject to consultation

General comments	
Documents submitted post Local Plan hearing / launch of consultation were not in compliance with the Council's constitution	The relevant delegation was in place and lawfully exercised.
Availability of consultation documents in deposit locations during the consultation period.	The consultation documents in addition to the FAQ document were available for inspection during opening hours throughout the consultation period. Feedback forms were also made available for people to take away and complete.
Objections to Green Belt sites contained within the Submission Local Plan that have been considered through the Stage Examination Hearings in September and October 2025.	

Appendix 2 - Consultation materials

Posters




EPSOM & EWELL
BOROUGH COUNCIL

Epsom & Ewell Local Plan

We're asking for comments
on additional documents
submitted during the Local
Plan Examination

**The consultation closes on
Monday 15 June**



To view the consultation documents
and comment: scan the QR code, or visit:
epsom-ewell.inconsult.uk/localplan.additionaldocuments

Printed copies of the consultation documents can be
found in reception at Epsom Town Hall and in local
libraries during normal opening hours.

Epsom and Ewell
Local Plan
2022-2040

Printer Flyer

EPSOM & EWELL
BOROUGH COUNCIL

Epsom & Ewell Local Plan

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Printed copies of the consultation documents can be found in reception at Epsom Town Hall and in local libraries in Epsom & Ewell during their normal opening hours.

EPSOM & EWELL
BOROUGH COUNCIL

Epsom & Ewell's Local Plan, covering the period up to 2040, is now at Examination Stage - the final stage of the Local Plan process before the plan can be legally adopted.

Epsom & Ewell Borough Council is carrying out a five-week public consultation on documents submitted to the Inspector since 8 October 2025. These documents relate to additional sites that could potentially be allocated through main modifications to the Local Plan following this consultation.

The consultation will run from Monday 11 May 2026 until Monday 15 June 2026, closing at 23.59.

To view the consultation documents and comment, scan the QR code:



Or visit the website:
epsom-ewell.inconsult.uk/localplan/additionaldocuments

Printed copies of the consultation documents can be found in reception at Epsom Town Hall and in local libraries in Epsom & Ewell during their normal opening hours.

To view the consultation documents and comment, scan the QR code or visit:
epsom-ewell.inconsult.uk/localplan/additionaldocuments

Epsom & Ewell Local Plan 2022-2040

Epsom & Ewell Local Plan 2022-2040

EEBC asks for comments on additional documents submitted during the Local Plan Examination

Comments (0)

Epsom & Ewell's Local Plan, covering the period up to 2040, is now at Examination Stage - the final stage of the Local Plan process before the plan can be legally adopted. As part of the examination, the council has been instructed by a government appointed Planning Inspector to undertake additional work in relation to potential additional sites that could be allocated through the Inspector's main modifications to the plan.



We have launched a consultation to invite comments on specific documents submitted to the Inspector since October 2025 which identify potential additional sites that could be allocated in the borough's Local Plan to increase housing delivery. The documents, along with instructions on how to comment, are available

Social Media example



 **Epsom & Ewell Borough Council**
Published by Orlo · 12 June at 10:02 ·

 Epsom & Ewell's Local Plan consultation closes at 23:59 on Monday 15 June – this is your final chance to have your say. The Local Plan, covering the period up to 204... [See more](#)


Epsom & Ewell Local Plan
We're asking for comments on additional documents submitted during the Local Plan Examination
The consultation closes on Monday 15 June

Find out more:
epsom-ewell.gov.uk/localplanexamination



PLANNING

PUBLIC NOTICE
Epsom & Ewell Borough Council
TOWN AND COUNTRY PLANNING ACT (LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012
PART 6: Local Plans
LOCAL PLAN EXAMINATION: POST HEARING CONSULTATION ON
ADDITIONAL DOCUMENTS SUBMITTED BY THE COUNCIL

The Epsom and Ewell Local Plan (2022-2042) was submitted to the Planning Inspectorate on the 10 March 2025 and is currently at examination. Following public hearings held in September/October 2025 the Council was required by the Inspector examining the plan to undertake additional work. This has resulted in the Council submitting several additional documents to the Inspector, which identify additional potential sites for allocation. A five-week public consultation is being held with responses being invited on these additional documents only.

Where to view the documents and how to respond to the consultation

The additional documents and further information on the Local Plan examination and current consultation are available on the Council website/consultation platform:

- epson-ewell.gov.uk/local-plan
- epson-ewell.inconsult@localplan.additionaldocuments

Copies of the additional documents are also available for inspection at:

- Epsom & Ewell Borough Council, Town Hall, The Parade, Epsom, KT18 5BY, between the hours of 9am and 4.30pm, Monday to Friday. Closed bank holiday 25 May 2026.
- All main libraries in the borough (please check individual library websites for opening hours)

Consultation period:

The consultation period runs from **Monday 11 May to Monday 15 June 2026**. Responses are invited during this period and must be received no later than 23.59 hrs on the last day of the consultation period.

Responses:

Responses are encouraged via completion of the standard response form, which is available electronically on the Council's website or in hard copy at the Town Hall and borough libraries.

Completed response forms or other formal written responses may be submitted to the Council in the following ways:

- By email to localplan@epson-ewell.gov.uk
- By post to Planning Policy, Epsom & Ewell Borough Council, Town Hall, The Parade, Epsom, Surrey, KT18 5BY



TOWN AND COUNTRY PLANNING ACT 1990
PLANNING (LISTED BUILDING AND CONSERVATION AREAS) ACT 1989
 (as amended)
TOWN AND COUNTRY PLANNING (GENERAL DEVELOPMENT) ORDER
 2009 (as amended)
NOTICE OF APPLICATION FOR MAJOR DEVELOPMENT
ARTICLE 12B

In accordance with the above, notice is hereby given that application(s) have been made to Epsom & Ewell Borough Council for permission to carry out the following proposal(s):

26/00464/FLH 7A Longdown Lane North, Ewell, Surrey
 Erection of a single-storey rear and side extension, including associated alterations and the construction of an in-fill loft dormer extension between existing rear dormers.

An electronic copy of the application may be inspected online at: <https://eplanning.epson-ewell.gov.uk/online-applications/> or via internet access at Epsom Town Hall, The Parade, Epsom, Surrey, KT18 5BY or in public libraries. Any comments should be made using the facility provided at the above website address or in writing to the Planning Department at the above address. Correspondence should quote the above application reference and should arrive no later than 21 days from the date of this notice.

It should also be noted that any representation received may be made available for inspection by the public, and may be copied as a result of the provisions of the Local Government (Access to Information) Act 1985. Representations will not be acknowledged until after an application has been determined. Late representations cannot normally be taken into consideration.

Please note that the Council do not accept any responsibility for any incomplete or inaccurate descriptions.

Head of Planning,
 Epsom & Ewell Borough Council




STAY INFORMED ABOUT PARKING PERMIT PLANS FOR YOUR COMMUNITY.

You'd want to know if someone was applying to keep a LORRY NEXT TO YOUR HOUSE, right?

The Public Notice Portal is a free to use, online service that will tell you who is applying for what and for where.

TRAFFIC & Roads

THE SURREY COUNTY COUNCIL
Church Road (C197) Epsom
Temporary Prohibition of Traffic Order 2026

On 13 May 2026 Surrey County Council made the above mentioned Temporary Traffic Order under Section 14(1) of the Road Traffic Regulation Act 1984, the effect of which will be to prohibit vehicles from entering or proceeding in that length of Church Road (C197) Epsom as extends from its junction with (D2089) College Road to its junction with (D2451) Winbourne Close. Alternative Route: Church Road, (A2022) Upper High Street, (B284) Church Street, and Pitt Road, or this route in reverse. This Order is required to facilitate tree felling works for, or on behalf of, Barton Arboriculture. These works are anticipated to be carried out over 1 day, between the hours of 9.30am and 4pm, during the 12-month period of operation of this Temporary Order that commences on 28 May 2026. Advanced warning signs will be displayed, and the temporary closure will only operate when the relevant traffic signs are displayed. Access to premises within the affected length of road, including access by emergency service vehicles to these properties will be maintained at all times, via the bankmen on site, as will access for pedestrians and dismounted cyclists.

Parklawn Avenue (D2137) and Eastdean Avenue (D2137) Epsom
Temporary Prohibition of Traffic Order 2026

On 8 May 2026, Surrey County Council made the above-mentioned Temporary Traffic Order under Section 14(1) of the Road Traffic Regulation Act 1984, the effect of which will be to prohibit vehicles from entering or proceeding in that length of: (a) Parklawn Avenue (D2137) Epsom as extends from the northern boundary of 4 Parklawn Avenue to the southern boundary of 6 Parklawn Avenue; (b) Parklawn Avenue (D2137) Epsom as extends from the eastern boundary to the western boundary of 57 Parklawn Avenue; and (c) Eastdean Avenue (D2137) Epsom as extends from its junction with Parklawn Avenue (D2137) to the western boundary of 14 Eastdean Avenue.

Alternative route – (a) B280 (West Hill) and Wheelers Lane, or this route in reverse. (b) Eastdean Avenue. (c) Parklawn Avenue.

This Order is required to enable SGN to facilitate gas main replacement and associated works. These works are anticipated to be carried out during the 12-month period of operation of this Temporary Order that commences on 25 May 2026 over 3 phases between the hours of 8.00am and 5.00pm. (a) is anticipated to commence on 25 May 2026 for 2 weeks. (b) is anticipated to commence on 22 June 2026 for 2 weeks. (c) is anticipated to commence on 8 June 2026 for 2 weeks. Advanced warning signs will be displayed and the temporary closures, which are anticipated to be in operation for 24-hours per day, will only operate when the relevant traffic signs are displayed. Access for emergency services and residents to properties with the closure but not through it will be maintained. Access for pedestrians, dismounted cyclists and dismounted equestrians will be maintained at all times.

Various Roads in West Ewell
Temporary Prohibition of Traffic Order 2026

Surrey County Council propose to make the above-mentioned Temporary Order under Section 14(1) of the Road Traffic Regulation Act 1984, the effect of which will be to prohibit vehicles from entering or proceeding in the entire length of: – a) D2358 Plough Road, West Ewell. b) D0463 Worthfield Close, West Ewell. c) D2259 Limescroft Close, West Ewell. d) That length of D2041 Kingsnade Close, West Ewell. e) D2384 Southville Close, West Ewell. This Traffic Order is required to enable Southern Gas Networks to carry out gas mains replacement and/or connections and/or maintenance works. These works are anticipated to be carried out within 2 months of the 12 month period of operation of this Temporary Order that commences on 01 June 2026. Advanced warning signs will be displayed and the temporary closures which are anticipated to be required for 24 hours each, day will only operate when the relevant traffic signs are displayed. Access for pedestrians and, dismounted cyclists and equestrians will be maintained at all times. The Council are satisfied that, in accordance with Section 3(2) of the Act, vehicular access to and from premises within the lengths of roads above, or accessible only therefrom may be restricted in order to avoid danger to persons or other traffic using the road and/or preventing the likelihood of such danger arising. Access to affected property will be maintained under direction of gatekeepers/ operatives. Access for emergency services, residents and businesses will be gained via the alternative route: – Chesington Road, Belfield Road and Northcroft Road.

Dated 14 May 2026
 Authorising Officer – Lloyd Allen
 Assistant Director – Network Management
 Enquiries to: Traffic Regulation Orders Team, Hazel House,
 Merrow Lane, Guildford, Surrey GU4 7BD Telephone: 0330 200 1003

Road Traffic Regulation Act 1984, Section 16A
Public Footpath No. 50 (Epsom & Ewell)
Temporary Prohibition of Traffic Order 2026

On 7 May 2026 Surrey County Council made the above mentioned temporary order, the effect of which is to prohibit all traffic on foot or by any other means from entering or proceeding along that length of Public Footpath No. 50 (Epsom and Ewell) from its junction with Ashley Road (grid reference 521644 158634) south for 155 metres (to grid reference 521624 158480).

The order is required to enable a special event, the Epsom Derby, to go ahead safely, and to enable the safe construction and dismantling of temporary facilities at the racecourse before and after the event.

The closure will be in operation from 11 May to 15 June 2026. That period can be extended by the Secretary of State for Transport if required.

Suggested alternative route: from Ashley Road proceed west along the road, then generally southwest and southeast on private tracks to rejoin the footpath south of the racecourse. The temporary closure will only be in operation when appropriate road traffic signs are displayed on site by the county council or an authorised person acting on its behalf.

The 'Surrey County Council Public Footpath No. 50 (Epsom & Ewell) Temporary Prohibition of Traffic Order 2026' was made by the county council under Section 16A of the Road Traffic Regulation Act 1984.

Dated: 14 May 2026
 Lucy Morris, Director – Highways, Transport and Network Management
 Any enquiries relating to this notice should be directed to:
 Countryside Access Team, Surrey County Council,
 Whitebeam Lodge, Merrow Depot, Merrow Lane, Guildford, GU4 7BD.
 Tel: 03456 009009 or email: rightsofway@surreycc.gov.uk



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TRAFFIC & Roads

Transport for London Public Notice

Road Traffic Regulation Act 1984
The A243 GLA Road and Side Roads (Hook Road and Various Roads, Royal Borough of Kingston Upon Thames) (Temporary Prohibition of Traffic) Order 2026

1. Transport for London in consultation with the Royal Borough of Kingston Upon Thames hereby gives notice that it intends to make the above named Traffic Order under section 14(1) of the Road Traffic Regulation Act 1984 for the purpose specified in paragraph 2. The effect of the Order is summarised in paragraph 3.

2. The purpose of the Order is to enable installation of HV electrical ducts for cable installation works to take place on Hook Road.

3. The effect of the Order will be to prohibit any vehicle from:

- (1) entering, exiting or proceeding on the circulatory traffic system at the junctions of Hook Road, the A3 Kingston Bypass on and off slip roads, Hook Rise North and Hook Rise South, hereafter referred to as Hook Junction Roundabout, between its junctions with the southbound carriageway of Hook Road and the northbound carriageway of Hook Road;
- (2) entering, exiting or proceeding on Mansfield Road between its junctions with the unnamed service road fronting Nos. 438 to 442 Hook Road and the circulatory traffic system at the junctions Hook Road, Bridge Road, Leatherhead Road and Mansfield Road;
- (3) proceeding in a northerly direction on Hook Road between its junction with the Hook Junction Roundabout and Haycroft Road;
- (4) entering or exiting the service road fronting Nos. 525 to 543 Hook Road at its junction with Bridge Road;
- (5) entering or exiting the service road fronting Nos. 2 to 8 Bridge Road and 1 to 9 Leatherhead Road at its junction with Bridge Road;
- (6) turning right from the northbound carriageway of Hook Road onto Elm Road;
- (7) turning right from Elm Road onto the northbound carriageway of Hook Road;
- (8) turning right from Clayton Road onto the southbound carriageway of Hook Road;
- (9) entering or exiting Chesington Parade at its junction with Leatherhead Road

The Order will also:

- (10) suspend the one way working on Chesington Parade to allow two way working;
- (11) allow all vehicles to enter the service road fronting Nos. 525 to 543 Hook Road at its junction with Hook Road.

Works will be phased such that some restrictions will apply only at certain times.

The Order will be effective between 7:00 AM on 1st June 2026 and 7:00 PM on 1st December 2026, or when the works have been completed, whichever is the sooner. The prohibition will apply only during such times and to such extent as small time to time be indicated by traffic signs.

4. The prohibitions will not apply in respect of:

- (1) any vehicle being used for the purposes of those works or for fire brigade, ambulance or police purposes;
- (2) anything done with the permission or at the direction of a police constable in uniform or a person authorised by Transport for London.

5. At such times as the prohibitions are in force an alternative route will be indicated by traffic signs for the Hook Junction closure via Hook Road (southbound), Chesington Roundabout and Hook Road (northbound) to normal route of travel. For northbound traffic on Hook Road wanting Elm Road via Hook Road (northbound), Hook Junction Roundabout and Hook Road (southbound) to normal route of travel. For traffic in Elm Road wanting to go northbound on Hook Road via Hook Road (southbound) and Chesington Roundabout to normal route of travel. For traffic in or wanting Clayton Road via Hook Rise (northbound), Hook Junction Roundabout and Hook Road (southbound) and in reverse to normal route of travel. For the Chesington Roundabout closure wanting Mansfield Road via Hook Road, Clayton Road and Woodgate Avenue or in reverse to normal route of travel. For traffic wanting Mansfield Road via Leatherhead Road, Merril Gardens and Coppard Gardens to normal route of travel. For the Hook Road closure at Hook Junction via A3 Kingston Bypass (eastbound), Tolworth Roundabout, Tolworth Broadway, Ewell Road, Kingsdowne Road and Upper Brighton Road to normal route of travel.

Dated this 14th day of May 2026

Media Coverage example



A focused consultation on aspects of Epsom&Ewell Local Plan which the Borough is due to complete examination before its absorption into East Surrey:

EEBC asks for comments on additional documents submitted during the Local Plan Examination

May, 2026

Epsom & Ewell's Local Plan, covering the period up to 2040, is now at Examination Stage – the final stage of the Local Plan process before the plan can be legally adopted. As part of the examination, the council has been instructed by a government appointed Planning Inspector to undertake additional work in relation to potential additional sites that could be allocated through the Inspector's main modifications to the plan.

- [Trains realtime departures at Leatherhead](#)
- [Surrey Hills Radio](#)
- <http://www.rivermoleriverwatch.org.uk>
- Epsom Foodbank
<https://goodcompany.org.uk>
- Weather <https://www.lavendercam.net>
- Leatherhead FC
<http://www.leatherheadfc.com>
- <http://news.molevalley.gov.uk>
- <https://www.surreycc.gov.uk/community/news/press-releases>
- SCC Highways & online reporting
<https://www.surreycc.gov.uk/do-it-online/report-it-online>
- <https://www.molevalley.gov.uk/planning-building/search-planning-application/>
- <https://www.elmbridge.gov.uk/planning/fin-d-or-comment-planning-application>
- [Leret Partnership Joint Venture Bull/Swan](#)

Consultation platform

Local Plan Examination: Post Hearing Consultation on Additional Documents Submitted by the Council

Consultation Overview

As part of the Local Plan examination stage a five-week public consultation is being undertaken on documents submitted to the Inspector since 8 October 2025. These documents relate to additional sites that could potentially be allocated through main modifications to the Local Plan following this consultation.

The documents being consulted upon are:

- COUD_020 - Assessment of Urban Sites
- COUD_021 - Green Belt Topic Paper additional work
- COUD_029 - Additional Sites for Potential Allocation document
- COUD_030 - Sustainability Appraisal (SA) Report Addendum
- COUD_031 - Habitats Regulations Assessment (HRA) Addendum
- COUD_032 - Infrastructure Delivery Plan (IDP) Addendum
- COUD_033a - Transport Assessment Addendum
- COUD_033b - Transport Assessment Technical Annex

The consultation will run from Monday 11 May 2026 until Monday 15 June 2026, closing at 23.59.

Please note comments are only being sought on the documents detailed above and not on any other documents that have been submitted for Examination, including the Proposed Submission Local Plan.

Reference copies of the consultation documents along with copies of the response forms are available from the Town Hall and borough Libraries during opening hours.

Background and Further Information

This consultation is being held at the request of the Inspector. During the second stage examination hearings held in September/October 2025 concerns were raised that the Council is not doing enough to meet its housing needs through the submitted Local Plan. The Plan proposes to meet approximately 47% of the borough's housing need identified through the standard method that applied when the plan was prepared. As a result, the Inspector requested the Council undertake additional work which has led to the submission of several documents, which identify additional potential sites for allocation. These documents are the subject of this consultation.



Have Your Say



The consultation platform can be accessed from the following link: [Epsom and Ewell Local Plan 2022-2040 Regulation 19 Consultation - Epsom and Ewell Borough Council Consultations](#)

Epsom and Ewell Borough Council website pages

Emerging Local Plan 2022-2040 | Epsom and Ewell Borough Council

Submission of the Local Plan Priority Page

Epsom and Ewell's Local Plan (Proposed Submission, also known as the 'Regulation 19' Version), along with all **representations** received at the Proposed Submission publication stage and the evidence supporting the Plan, was submitted to the Secretary of State for independent examination in public by a Planning Inspector on 10 March 2025.

A **Submission Statement of Fact** has been produced setting out details of the submission and where the Submission documents can be found.

The submitted documents and supporting evidence can be found in the **Submission Library** section on our **Examination** webpage along with the **representations** received on the proposed submission Local Plan.

Examination

The examination is the final stage of the Local Plan process before it can be legally adopted. An Inspector has now been appointed to lead the examination of the Epsom and Ewell Local Plan on behalf of the Secretary of State for the Ministry of Housing, Communities and Local Government. To find out more visit the [Examination page](#).

Post Hearing Public Consultation

From 11 May to 15 June 2025 a five week public consultation is being undertaken on the following documents that have been submitted by the Council to the Inspector since 8 October 2025:

- CCJDD020 - LPA addendum
- CCJDD021 - Green Belt Topic Paper Addendum
- CCJDD029 - Potential sites for allocation Document
- CCJDD040 - SA Addendum
- CCJDD041 - HRA Addendum
- CCJDD042 - IDP addendum
- CCJDD044 - Transport Assessment Addendum

These documents relate to additional sites that could potentially be allocated through main modifications to the Local Plan following this consultation. The consultation documents and response forms are available on the [Council's consultation portal \(link is external\)](#) - with hard copies available to view in the following locations:

- **Epsom & Ewell Borough Council:** Town Hall, the Parade, Epsom, KT18 5BY
Opening times: Monday to Friday 9am until 4.30pm. Closed Saturday, Sunday and bank holidays.
- **Epsom Library:** 6 Epsom Square, Epsom, KT19 8AG
Opening times: Monday, Wednesday & Friday 9.30am until 5.30pm, Tuesday & Thursday 9.30am until 7pm, Saturday 9.30am until 5pm. Closed Sunday and bank holidays.
- **Ewell Library:** Bourne Hall, Spring Street, Ewell, Epsom, KT17 1UF
Opening times: Tuesday to Saturday 9.30am until 5pm. Closed Monday, Sunday and bank holidays.
- **Ewell Court Community Library:** Ewell Court House, Lakehurst Road, Ewell, KT19 0BB
Opening times: Tuesday, Wednesday & Friday 10am until 5pm, Saturday 10am until 4pm. Closed Monday, Thursday, Sunday & bank holidays.
- **Stoneleigh Community Library:** 1 Stoneleigh Broadway, Stoneleigh, Epsom, KT17 2JA
Opening times: Monday, Tuesday & Friday 10am until 1pm and 2pm until 5pm, Thursday 10am until 1pm, Saturday 10am until 4pm. Closed Wednesday, Sunday and bank holidays.

The examination is the final stage of the Local Plan process before it can be legally adopted. An Inspector has now been appointed to lead the examination of the Epsom and Ewell Local Plan on behalf of the Secretary of State for the Ministry of Housing, Communities and Local Government. To find out more visit the [Examination page](#).

Frequently Asked Questions

Follow this link to see a [list of questions and answers](#) about the Local Plan process.

Previous Consultations

Publication of the Local Plan, Regulation 19 - Proposed Submission Local Plan (2022-2040)

The Council published the 'Proposed Submission' or 'Regulation 19' version of the Epsom and Ewell Local Plan for comments between 20 December 2024 and 5 February 2025. The consultation has now closed. However, you can find the Proposed Submission Local Plan and associated documents on our [Consultation Portal](#) and [previous consultations page](#).

Regulation 18 Draft Local Plan (2022-2040)

The Council consulted on a Regulation 18 Draft Local Plan between 1 February 2023 and 19 March 2023. The consultation has now closed. [Find out more about our previous consultations page](#).

Further detail on the Local Plan timetable can be found in the [Local Development Scheme](#). The preparation of a Local Plan goes through several key stages. Our Local Development Scheme (LDS) sets out the timetable for the preparation of the local plan through to its adoption.

Accessibility

Please note: some of our PDF documents may not be suitable for users of assistive technology. If you need them in a more accessible format, please email localplan@epsom-ewell.gov.uk.



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- Local Plan - call for sites
- Planning consultations**
- Current Local Plan

Planning consultations

Live consultations

Local Plan consultation on additional documents

11 May to 15 June 2026

As part of the Local Plan examination stage a five week **public consultation**[\(link is external\)](#) is being undertaken on the following documents submitted by the Council to the Inspector since 8 October 2025:

- COLDX20 - LAA addendum
- COLDX21 - Green Belt Topic Paper Addendum
- COLDX29 - Potential sites for allocation Document
- COLDX30 - SA Addendum
- COLDX31 - HRA Addendum
- COLDX32 - IDP addendum
- COLDX33 - Transport Assessment Addendum

These documents relate to additional sites that could potentially be allocated through main modifications to the Local Plan following this consultation. The consultation documents and response forms are available on the [Council's consultation portal](#)[\(link is external\)](#) - with hard copies available to view in the following locations:

Epsom & Ewell Borough Council: Town Hall, the Parade, Epsom, KT18 5BY
Opening times: Monday to Friday 9am until 4:30pm. Closed Saturday, Sunday and bank holidays.

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Ewell Library: Bourne Hall, Spring Street, Ewell, Epsom, KT17 1LJ
Opening times: Tuesday to Saturday 9:30am until 5pm. Closed Monday, Sunday and bank holidays.

Ewell Court Community Library: Ewell Court House, Lakehurst Road, Ewell, KT19 0BB
Opening times: Tuesday, Wednesday & Friday 10am until 5pm, Saturday 10am until 4pm. Closed Monday, Thursday, Sunday & bank holidays.

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Opening times: Monday, Tuesday & Friday 10am until 1pm and 2pm until 5pm, Thursday 10am until 1pm, Saturday 10am until 4pm. Closed Wednesday, Sunday and bank holidays.

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Consultations

Effective, efficient and worthwhile consultation is at the heart of our commitment to the community. We encourage people to engage with us to help us improve our services and provide value for money.

Current open consultations

Local Plan consultation on additional documents

11 May to 15 June 2025

As part of the Local Plan examination stage a five week **public consultation** is being undertaken on the following documents submitted by the Council to the Inspector since 8 October 2025:

- CCLD020 - LM addendum
- CCLD021 - Green Belt Topic Paper Addendum
- CCLD029 - Potential sites for allocation Document
- CCLD080 - SA Addendum
- CCLD081 - HRA Addendum
- CCLD082 - IDP addendum
- CCLD083 - Transport Assessment Addendum

These documents relate to additional sites that could potentially be allocated through main modifications to the Local Plan following this consultation. The consultation documents and response forms are available on the **Council's consultation portal** with hard copies available to view in the following locations:

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Opening times: Monday, Tuesday & Friday 10am until 1pm and 2pm until 5pm, Thursday 10am until 1pm, Saturday 10am until 4pm. Closed Wednesday, Sunday and bank holidays.

Previous Local Plan consultations are available here: <https://www.epsom-ewell.gov.uk/residents/planning/planning-policy/epsom-and-ewell-local-plan/emerging-local-plan-2022-2040/previous>

Previous consultations