

Town and Country Planning Act 1990

Appeal by Woolf Bond Planning Ltd against the refusal of planning permission by

Epsom & Ewell Borough Council of

Outline application for up to 110 dwellings including affordable homes (all matters reserved except access from Langley Vale Road).

Site address - Farm View, Langley Vale Road, Epsom, Surrey, KT18 6AP

Appeal Reference: APP/P3610/W/26/6006971

Local Planning Authority Reference: 25/00846/OUT

Proof of Evidence of Tim Dukes BSC (Hons) MSc MCIHT

Contents	Page
1.0 Introduction	3
2.0 Background and Scope	4
3.0 Planning Policy Context	5
4.0 Existing Highways & Transportation Network	6
5.0 Analysis of submitted information and main issues	10
6.0 Conclusions	27
 Appendices	 Page
A – County Highway Authority Responses	29
B – Recommended conditions	41
C – Photograph Locations	46

1.0 Introduction

- 1.1 I am Tim Dukes a Member of the Chartered Institution of Highways and Transportation. I hold a master's degree in Transportation Planning and Engineering from Southampton University.
- 1.2 I am Principal Transport Development Planning Officer covering the Epsom & Ewell area and have been employed by Surrey County Council since September 2007.
- 1.3 I have 14 years' experience working within Transport Development Planning focused on the highway impacts of proposed developments, prior to this I have five years' experience working within sustainable transport.
- 1.4 I am familiar with the site, the wider Epsom and Ewell area and the relevant local and national policies. I have visited the site multiple times and understand the operation of the local highway network.

2.0 Background and Scope

2.1 I am appearing as a witness at this inquiry as the Transport Development Planning representative for Epsom & Ewell Borough Council in relation to the Council's decision to refuse planning permission for the application at the Planning Committee of 26th February 2026.

2.2 In Highway terms the application was refused for the following reason (reason for refusal 1.)

1. *Unsustainable Development*

The proposal is sited in an unsustainable location with a lack of access to public transport and walking and cycling options, resulting in excessive reliance upon private car usage and a lack of alternative travel options, contrary to Sections 9 and 13 of the National Planning Policy Framework 2024, Policy CS16 of the Core Strategy 2007 and Policy DM10 of the Development Management Policies Document 2015

2.3 My evidence is presented under the following sections:

Section 3 – Planning Policy Context

Section 4 – Existing Highway and Transport Network

Section 5 – Analysis of Submitted Information and Main Issues

Section 6 – Conclusions

2.4 A signed Statement of Common Ground (SoCG) has been prepared between Surrey County Council and the Appellant which states matters of agreement.

2.5 The evidence prepared and provided for this appeal in this proof of evidence has been prepared by me and the opinions expressed are my true and professional opinions. I have not used Artificial Intelligence (AI) software to prepare this.

3.0 Planning Policy Context

3.1 The Development Plan - Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 together require that planning applications must be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise. The National Planning Policy Framework ("NPPF") or ("the Framework") (2025) and Planning Practice Guidance ("PPG") are material considerations.

3.2 The requirements in determining applications "in accordance with" the plan does not mean that an application must comply with each and every policy, but it is approached on the basis of the plan taken as a whole. This reflects the fact, acknowledged by the courts, that Development Plans are a broad statement of policy, many of which may be mutually irreconcilable, so that in a particular case one must give way to another. So far as the matters addressed by my evidence are concerned, the most important relevant policies of the development plan are:

- Policy CS16 of the Core Strategy 2007
- Policy DM10 of the Development Management Policies Document 2015.

3.3 National Planning Policy Framework (NPPF) - The NPPF (2026) section 15 sets out the Government's view on the principles for promoting sustainable transport and includes provisions under TR3: Vision-led approach to planning for transport, section 1.

3.4 Where specific reference is made to paragraphs within the policy and guidance documents within this proof it is noted, otherwise I confirm that the policy and guidance have been considered in full.

4.0 Existing Highway and Transport Network

4.1 The site is situated at the southern extent of Langley Vale, a small built-up area to the south of Epsom & Ewell Borough some 2.7 kilometres from Epsom town centre where most facilities are located.

4.2 A neighbourhood centre, and the nearest railway station are located at Tattenham Corner, this is east of the site approximately 2.9 kilometres away.

4.3 The nearest bus stop to the site is located on Grosvenor Road approximately 450 metres from the site. It is served by the E5 and 408 bus services. The 408 is a single daily service on weekdays only, and the E5 operates eight daily services except for Sundays. These services run between 06:32 to 19:15.

4.4 The site is accessed from Langley Vale Road, a predominantly rural unclassified road with varying posted speed limits of 30 mph and 40 mph within the vicinity of the site. Langley Vale Road features a footway on the eastern side of varying quality and width and includes pinch points that reduce the width to approximately 1 metre in places.

4.5 Streetlighting is present north of the site through Langley Vale and up to the Ashley Road junction. To the south it is provided close to a Pegasus crossing point leading to Chalk Lane.

4.6 The site can be accessed by non-motorised users via public Bridleways 33, 127, 146 and public Footpath 49 which provide routes across Epsom Downs. These are typically unsurfaced, or surfaced with loose, rather than bound, material. They are also unlit.

4.7 The wider area is characterised by routes that require users to navigate gradients, typically leading up to the Epsom Downs high point.

4.8 South of the site Langley Vale Road does not benefit from a footway, although Bridleway 146 runs parallel segregated from the carriageway by a hedge line. This section is unlit until the Pegasus crossing point.

4.9 Alternative routes to Epsom town centre along Headley Road and/or Farm Lane are constrained by a lack of pedestrian or cyclist provision and by the posted 40mph speed limits for both routes.

4.10 Routes from the bridleway/footway network to key destinations, particularly those located at Tattenham Corner are limited by a lack of footway provision within the locale. Desire lines across green verges are present, but these are unsurfaced and typically narrow.

4.11 In the initial response to the planning application Surrey County Council (Appendix A) referred to the Connectivity Score for the site, from the Department for Transport's Connectivity Tool ([GOV.UK - The best place to find government services and information](https://gov.uk/the-best-place-to-find-government-services-and-information))

4.12 The Connectivity Tool is intended to produce a national measure of connectivity for locations across the country, it calculates people's ability to get to where they want to go using mode of travel and key destinations. 100 square metre squares are assigned a score depending on their relative connectivity, rather than based on an average metric, as such the following table illustrates the application of scores in relation to destination:

Table A: By destination

	Overall	Education	Leisure	Health	Shopping	Residential	Workplaces
10th percentile	38.9	34.1	37.8	25.9	38.1	45.6	36.9
20th percentile	52.1	47.0	48.7	43.1	56.5	55.2	45.9
30th percentile	58.6	55.1	54.9	51.1	64.9	60.5	51.0
40th percentile	63.1	60.6	59.6	56.9	70.6	64.3	54.7
Median	66.8	65.0	63.6	61.7	75.2	67.3	58.0
60th percentile	70.2	68.9	67.5	66.1	79.3	70.2	61.1
70th percentile	73.7	72.8	71.7	70.3	83.4	73.5	64.4
80th percentile	77.8	77.1	76.8	74.9	87.4	77.4	69.1
90th percentile	83.2	82.7	83.3	80.6	91.6	84.6	78.8

Table A source - [GOV.UK - The best place to find government services and information](https://gov.uk/the-best-place-to-find-government-services-and-information)

4.13 The sites score is considered relatively low at 42, falling between to 10th and 20th percentiles in table A. The image below indicates the site location, the score and the how this compares with the wider Epsom & Ewell area:

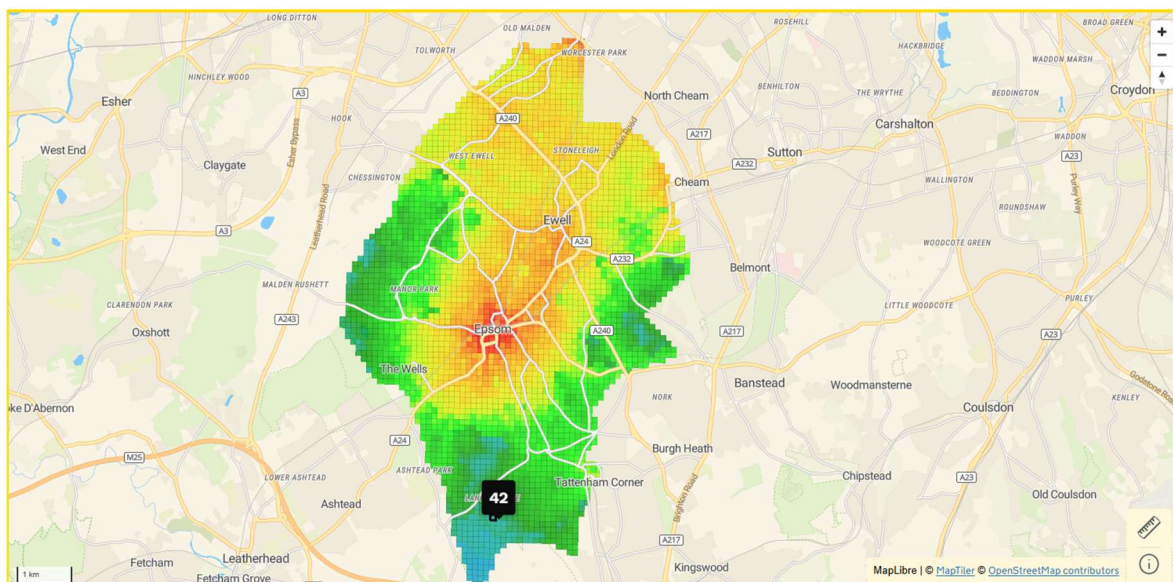


Image of DfT Connectivity Tool showing Epsom & Ewell area and the connectivity score of the site.

4.14 The site score of 42 compares unfavourably in connectivity terms to central Epsom (86) and Tattenham Corner (64), locations where key services are more connected. The Tool is intended to be used alongside local evidence, professional judgement and other material considerations. It is relatively new but is being increasingly used within the Transport Planning industry alongside a range of other tools.

4.15 For information, at the time of submitting that response Surrey County Council's understanding of the scoring system led to the comment within that response - *The Government's Connectivity Index (released only to Local Authorities at the moment) shows that the site scores 42 which comes in the bottom 15 percentile of the entire population of England and Wales.* This is incorrect and the current advice from the Department for Transport is *The score is a **relative measure**, not an absolute measure of connectivity – it shows how places compare to other places.* In addition, A score of 50 does **not** mean a location has average connectivity. ([Connectivity Tool](#))

4.16 A score of 42 however is considered low for this area, compared to other locations, and indicates that connections from the site to local destinations such as healthcare and secondary schools, alongside methods of travel to those sites are limited in terms of distance and available routes. The table below illustrates the connectivity scores for healthcare destinations based on mode of travel for the site:

Health

Type	National score	National Distribution
Overall (except driving)	27	Very low (10-20%)
Public transport	35	Very low (10-20%)
Walking	15	Lowest (0-10%)
Cycling	46	Very low (10-20%)
Driving	65	Very low (10-20%)

Image of DfT Connectivity Tool showing health destination metrics for the site

4.17 It is important to recognise that this score also does not consider quality or desirability of a route, and as explained further in this statement, these are key matters that I have considered in assessing the site, particularly with regard to route gradients, surfacing, width, lighting and security.

5.0 Analysis of Submitted Information and Main Issues

5.1 Epsom & Ewell Borough Council's case for refusal identifies the site's location as unsustainable: *"The proposal is sited in an unsustainable location with a lack of access to public transport and walking and cycling options, resulting in excessive reliance upon private car usage and a lack of alternative travel options."* Surrey County Council, in the consultation responses provided to the planning application (Appendix A) considers the site to not offer genuine choice of transport options for future occupiers.

5.2 The initial County Highway Authority (CHA) response dated 18th August 2025 stated that: *"The proposed development is situated in a relatively remote location, with poor sustainable travel opportunities to most everyday activities (with the exception of rural recreation) and does not propose sufficient mitigation to enable the prioritisation of sustainable transport modes and would thereby be almost entirely reliant on the private car for access."*

Local amenities to the site

5.3 The Appellant submitted additional information during the consultation period to improve pedestrian infrastructure, this was considered by the CHA. However, it only secured improvements to the existing services within Langley Vale, meaning that the only destinations within the "walkable neighbourhood" as defined by Manual for Streets (section 4.4) are The Vale Primary School, the petrol station and the Grosvenor Road bus stop. Secondary schools and all other education facilities, healthcare, wider retail, employment and leisure opportunities would all require travelling beyond a distance of 800 metres or a 10-minute walk.

5.4 Manual for Streets does consider distances further afield and references PPG13 stating that "walking offers the greatest potential to replace short car trips, particularly those under 2 km".

5.5 *Table 4.4 Local Amenity Accessibility* included within the submitted Transport Assessment indicates the overwhelming majority of key local destinations lie beyond even the 2 kilometres radius mentioned within Manual for Streets; only five out of the total 25 destinations lie within this distance.

5.6 In addition to distance, Manual for Streets also considers the quality and desirability of routes to be important: *"6.3.1 The propensity to walk is influenced not only by distance, but also by the quality of the walking experience. A 20-minute walk alongside a busy highway can seem endless, yet in a rich and stimulating street, such as in a town centre, it can pass without noticing."*

5.7 Given this, an assessment of the various routes was undertaken to evaluate the quality, and accessibility, for all users including those with vulnerable characteristics and those with mobility impairments.

5.8 The local destinations within the distance considered by Manual for Streets to offer the greatest potential for walking are The Vale Primary School – 1300 metres, the Fuelling Garage – 450 metres and Grosvenor Road Bus Stop – 450 metres. These can be accessed either via existing footways of variable quality on Langley Vale Road, Grosvenor Road and Beaconsfield Road.

5.9 Alternative routes to these destinations could be achieved via Bridleway 127 and Footpath 49, however these are unlit, do not feature a bound surface or drainage and are subject to gradient changes. As such they are not considered a genuine choice for all users.

5.10 Given the relatively small number of key facilities within the walkable distance of the site, those wishing to travel further afield to daily facilities such as secondary schools, tertiary education facilities and employment sites, or to other facilities, such as healthcare, retail, leisure or to gain access to the railway network, would likely resort to private motor vehicle transport to fulfil those journeys.

5.11 Langley Vale at present does not constitute a Liveable Neighbourhood as defined within Surrey County Council's Local Transport Plan 4, which seeks to *"enable people to meet the majority of their needs locally, within a short, manageable walk or cycle ride"*. All future occupiers of the proposed development would need to travel a distance beyond that recommended to access such facilities as a post office (2.8km), library (3km), public house (2.1km), public secondary school (Rosebery School, Epsom 3.7km), railway station (Tattenham Corner, 2.75km) and leisure centre (4km). The proximity of the nearest railway station is also not considered to be within a reasonable walking distance as defined under NPPF 2026 GB7, section h. point i.

Routes to alternative destinations - Epsom

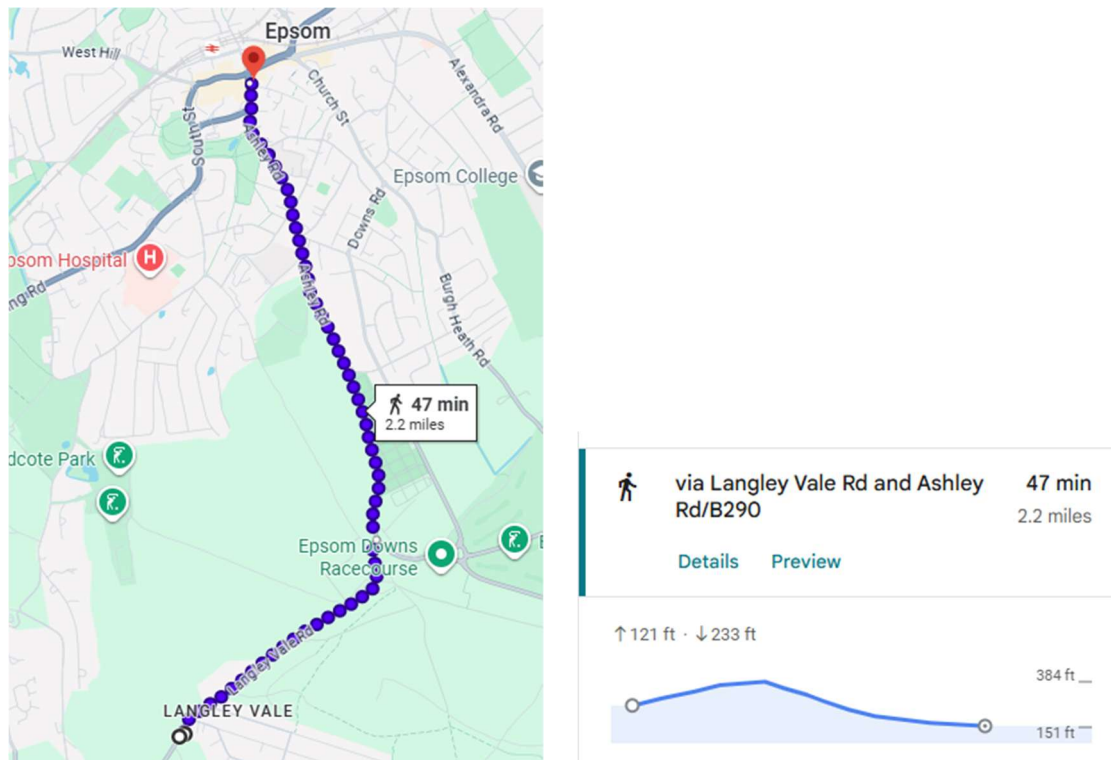
5.12 One of the key routes for future occupiers would be to gain access to the facilities on offer in Epsom town centre. The most direct route for cyclists and pedestrians would be via Langley Vale Road and Ashley Road. In addition to being beyond the recommended distance, the route itself requires navigating footways adjacent to Langley Vale Road and Ashley Road. In many locations these footways are narrow and in relatively poor condition, meaning wheelchair and mobility impaired individuals would likely struggle to use these routes comfortably and safely.

The image below shows a typical pinch point and the footway condition.

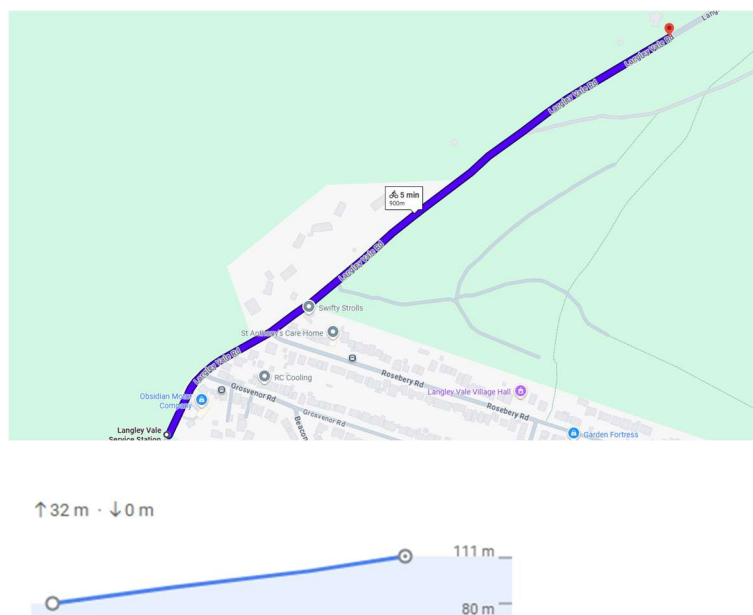


Photograph 1 - Langley Vale Road – 19th June 2026

5.13 In addition, these routes also involve significant changes in gradient with Epsom Downs being located on top of a hill, and both Langley Vale and Epsom being located on either side of this hill. The following Google Maps image illustrates the elevation changes for the route from Langley Vale to central Epsom:



5.14 The 900m stretch from Langley Vale Service Station travelling north is of a constant elevation, and over this distance rises 32m. This gives a gradient of 1:29.



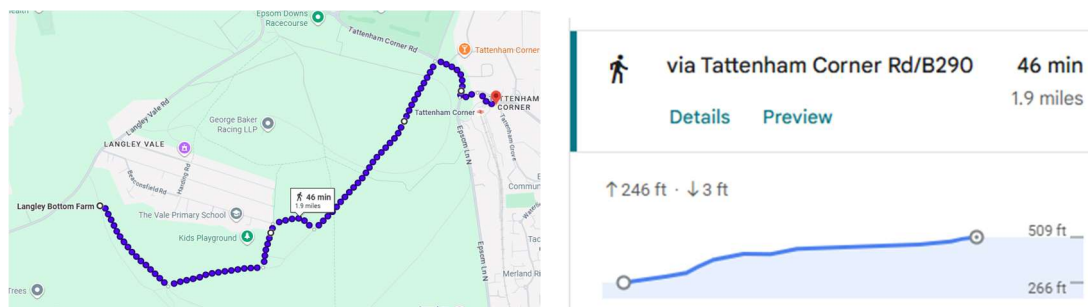
While this gradient could be acceptable as per Inclusive Mobility guidance ([Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure](#)). That guidance also states that:

“Even if a pedestrian route has no slopes in excess of 1 in 20, it is important that there are level sections, or ‘landings’, at regular intervals. This is to provide people with an opportunity to rest; where possible accessible seating should be provided on such landings. A level landing should be provided for every 500mm that the route rises. The length of each landing should be equal to at least the width of the ramp.”

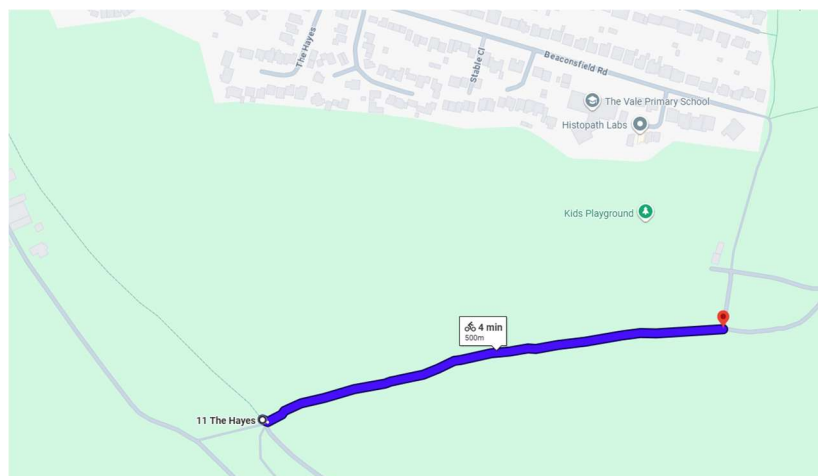
As such it is not considered that this route is appropriate for all elements of society to navigate.

Routes to alternative destinations – Tattenham Corner

5.15 The other key route to local destinations for future occupiers would be Tattenham Corner, this is the closest link to the railway network. Pedestrians would need to cross Epsom Downs via various Public Rights of Way routes. These are predominantly traffic free; however, they are again subject to significant gradient changes that would limit the access opportunities for certain elements of society. As can be seen from the Google Maps images below.



5.16 The 500m stretch from the Bridleway 33/Bridleway 127 junction west is of a relatively constant elevation and over this distance rises 32m.





This gives a gradient of approximately 1/15 which is in excess of the recommended maximum gradient of 1/20 defined in section 4.3 of Inclusive Mobility guidance:

“If a level route is not feasible, then gradients should not exceed 1 in 20. (A slope steeper than this is generally defined as a ‘ramp’).”

As such, again it is not considered that this route is appropriate for all elements of society to navigate.

5.17 In addition to the topographical changes, these routes are subject to changes in surfacing with much of them unbound and not provided with drainage meaning that, in inclement weather, they are difficult and unattractive routes. The footpath access between Langley Vale and Bridleway 127 for example is characterised by single track unsurfaced routes:



Photograph 2 - Footway link at Beaconsfield Road - 19th June 2026



Photograph 3 - Footway link to Bridleway 127 - 19th June 2026



Photograph 4 - Junction between footway link and Bridleway 127 – 19th June 2026

5.18 Inclusive Mobility recommends the following in relation to “Access in the Countryside” Section 15

“To allow for two-way pedestrian traffic, paths should be at least 2000mm wide with a clear visual distinction between the path surface and the ground next to it. If the path width has to be less than 1500mm, passing places (minimum 1500mm (wide) x 2000mm (long) should be provided every 50 metres. In principle, all paths should be uninterrupted by obstructions such as steps, stiles and fences and there should be a clear tonal and colour contrast between the path and the ground next to it. The

maintenance of a clear and obstruction-free space, or 'tunnel', that is at least 2100mm in height is recommended.

Much of the footway link to Bridleway 127 does not meet the above requirements in either width, passing place provision or height clearance.

5.19 To gain access to Tattenham Corner, future residents would need to cross the racecourse via Bridleway 127 and Old London Road (an unclassified road) as the most direct route. However, the link between this road and a footway on Epsom Lane North is limited to gated access over the grassed racecourse, and unsurfaced paths to the carriageway edge on Epsom Lane North. Again, this route limits access to wheelchair and pushchair users, and in inclement weather, would be unsuitable for some users and unattractive to many others.



Photograph 5 - Racecourse/Epsom Lane North junction – image 1 – 19th June 2026



Photograph 6 - Racecourse/Epsom Lane North junction – image 2 – 19th June 2026



Photograph 7 - Racecourse crossing point 1 – 19th June 2026



Photograph 8 - Racecourse crossing point 2 – 19th June 2026

Routes to alternative destinations – Ashted/Epsom

5.20 Cyclists typically can travel farther and faster than pedestrians, however again, the proposed site does not account for the quality of the routes proposed – Langley Vale Road, Headley Road, Ashley Road, Farm Lane, Wilmerhatch Lane and other direct links are all characterised by minimal cyclist or pedestrian provision lacking footways entirely or relying on the parallel bridleway access that is surfaced with unbound materials.

5.21 Bridleway 146 running parallel to Langley Vale Road southbound of the site access is separated from the road and adjacent landscape by two hedges and has

an unbound surface, meaning that in inclement weather it is difficult to navigate by both foot and cycle. The lack of streetlighting may discourage use by some users in the hours of darkness.



Photograph 9 - Bridleway 146 adjacent to Langley Vale Road – 19th June 2026

5.22 Headley Road provides no footway facilities and is a 40mph speed limit route. This is not considered an attractive route for the majority of cyclists or pedestrians.



*Photograph 10 -View south- Headley Road/Chalk Pit Road junction –
19th June 2026*



*Photograph 11 – View north - Headley Road/Chalk Pit Road junction –
19th June 2026*

5.23 The Appellant has produced a Travel Plan for the submitted planning application which Surrey County Council assessed. The submitted travel plan sought to reduce car travel from 57.1% (assumed baseline year, based on 2011 census data) to 47.1% in the fifth year of the development's lifespan.

5.24 In order to achieve these the following actions were included in addition to the infrastructure already considered:

- Negotiated discounts with local cycle stores/bike workshops.
- Walking and Cycling Route Information.
- Promotion of apps such as Strava, AllTrails aiming to encourage sustainable travel.

- Travel plan website/travel pack including information of bus and rail services alongside travel vouchers.
- Promotion of car sharing via travel plan website/travel pack.

It is not considered that this level of travel planning would deliver significant benefits in terms of the reduction in car mode travel proposed. This is primarily due to the relative unsustainability of the site's location in transport terms (i.e. it's sheer distance from facilities and the infrequency of bus services), and the lack of reasonable measures that can be used to address the issues raised within this report – fundamentally the poor-quality pedestrian and cycle connections and the difficulties in improving these.

5.25 The existing bus service provision is not considered to represent a sufficiently frequent or wide enough service to attract car users from their typical choices and offer a genuine alternative option. Typically, such a service would be sought to be upgraded to offer a more frequent service operating throughout the week including Sundays.

5.26 A contribution to improve this service was requested and a £200,000 figure (per annum for five years) was agreed between Surrey County Council and Appellant. While this will offer benefits for future occupiers of the site, as well as residents, it is by no means clear whether the additional householders in the locale will allow for this to be an ongoing commercially successful addition to the existing service.

6.0 Conclusions

6.1 In relation to reason for refusal 1. I have concluded that the site occupies an unsustainable location in transport terms, with a lack of options for carrying out journeys on foot or by bicycle and with limited opportunities to utilise public transport.

6.2 There is not genuine choice for future residents of this site, particularly those who are more vulnerable to the effects of uneven surfaces and gradient changes that make utilising mobility aids difficult or impossible.

6.3 Provision for secure routes is also lacking, meaning that lighting during hours of darkness on key routes is missing or limited. There is a lack of security afforded by overlooking properties, with all the routes to and from Langley Vale needing to pass through open areas that lack this urban characteristic.

6.4 I am of the view that the originally provided response stating – *"The developer has not demonstrated that through investment in bus service provision, and cycle and pedestrian infrastructure, they can secure a step change improvement to this very poor level of accessibility as currently exhibited, so the site is likely to remain almost entirely reliant upon the private car, and unable to prioritise sustainable transport modes."*

6.5 The proposal does not meet the requirements of Policy CS16 of the Core Strategy 2007 which state *"Encouragement will be given to development proposals and management policies which foster an improved and integrated transport network and facilitate a shift of emphasis to non-car modes as a means of access to services and facilities."* The location of the site will mean that future occupiers will be dependent on private motor vehicle travel for many of their daily journeys, and opportunities for alternative travel, public transport, cycling and walking are very limited. This will not foster a shift in emphasis to non-car modes.

6.6 In addition, the development proposal is not consistent with the Surrey local Transport Plan 4 in that it does not minimise the need for travel as stated within CS16 *"Development proposals will be required to be consistent with, and contribute to, the implementation of the Surrey Local Transport Plan and should: minimise the need for travel"* and does not meet the objectives of providing access for all *"provide safe, convenient and attractive accesses for all, including the elderly and disabled, and others with restricted mobility"*.

6.6 The proposal does not meet the requirements of Policy DM10 of the Development Management Policies Document 2015. This requires that New Developments should *"be adaptable and sustainability designed, subject to aesthetic considerations"* and should *"incorporate the principles of safe design to reduce the risk and fear of crime, e.g. natural surveillance, appropriate levels of lighting"*. It is my view that the site is not located in a sustainable location and that

the routes that future occupiers would be required to use to gain access to key destinations are not secure for all members of society.

6.7 The proposal does not meet the requirements of the NPPF in that the proximity of the nearest railway station is not within a reasonable walking distance as defined under NPPF 2026 GB7, section h. point i. The location of the site does not limit the need to travel, particularly by private car, or offer a genuine choice of transport modes for all residents and users as per Policy TR3 1. a. of the NPPF 2026

6.8 Should the Inspector be minded to uphold the Appeal, I request the obligations and conditions within Appendix B be included within any permission granted.

APPLICATION NUMBER	EP/25/0846
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DEVELOPMENT AFFECTING ROADS
TOWN AND COUNTRY PLANNING GENERAL DEVELOPMENT ORDER 1992

Applicant: Fairfax Aspire Ltd

Location: Farm View, Langley Vale Road, Epsom.

Development: Outline application for up to 110 dwellings including affordable homes (all matters reserved except access from Langley Vale Road)

Contact Officer	Mike Green	Consultation Date	22 July 2025	Response Date	<u>18 August</u> <u>2025</u>
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The proposed development has been considered by THE COUNTY HIGHWAY AUTHORITY (CHA) who has assessed the application on safety, capacity and policy grounds and recommends the proposal be refused on the grounds that:

- 1) The proposed development is situated in a relatively remote location, with poor sustainable travel opportunities to most every day activities (with the exception of rural recreation), and does not propose sufficient mitigation to enable the prioritisation of sustainable transport modes and would thereby be almost entirely reliant on the private car for access, and therefore contrary to Paras 110, and 115 a) of the NPPF, and CF16 of the Epsom and Ewell Core Strategy 2007, and Healthy Streets for Surrey.
- 2) It has not been demonstrated that there is sufficient forward visibility for northbound traffic of right turners waiting on Langley Vale Road to turn into the site, and the proposed development would therefore lead to danger to users of the highway and therefore contrary to Para 115a of the NPPF and meeting the criteria of paragraph 116 of the NPPF.

Note to Planning Officer in respect of reason for refusal 2): If the applicant were to demonstrate through accurate speed checks and queue measurement that this reason could be overcome through mitigation then the County Highway Authority would be prepared to consider appropriate mitigation that may address these concerns.

Explanation for refusal: The site is located where there are very few services that are available through good public transport accessibility, or through reasonable cycle/pedestrian facilities. The only real services or activities within reasonable walking distance are a primary school and a very small and poorly stocked shop associated with a local garage, or rural pursuits such as horse riding, cycling or walking. The Government's Connectivity Index (released only to Local Authorities at the moment) shows that the site scores 42 which comes in the bottom 15 percentile of the entire population of England and Wales, which is a very poor performance for a location so near to London and its suburbs around Epsom. The developer has not demonstrated that through investment in bus service provision, and cycle and pedestrian infrastructure, they can secure a step change improvement to this very poor level of accessibility as currently exhibited, so the site is likely to remain almost entirely reliant upon the private car, and unable to prioritise sustainable transport modes. Unless the measurement of connectivity can be significantly improved to a level approximately above a score of 70 which falls within the 60th to 100th percentile range, the County Council remain of the view that the location should not serve a significant increase in residential development.

In terms of visibility of right turning traffic into the site, for those travelling northbound on Langley Vale Road, there is insufficient forward visibility on this downhill section of carriageway due to dense vegetation on the inside of the bend.

APPLICATION NUMBER	EP/25/0846
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DEVELOPMENT AFFECTING ROADS

TOWN AND COUNTRY PLANNING GENERAL DEVELOPMENT ORDER 1992

Applicant: Fairfax Aspire Ltd

Location: Farm View, Langley Vale Road, Epsom, KT18 6AP

Development: Outline application for up to 110 dwellings including affordable homes (all matters reserved except access from Langley Vale Road)

Contact Officer	Tim Dukes	Consultation Date	22 July 2025	Response Date	<u>10</u> <u>November</u> <u>2025</u>
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The proposed development has previously been considered by THE COUNTY HIGHWAY AUTHORITY (CHA) who assessed the application on safety, capacity and policy grounds and recommended the proposal be refused on the grounds that:

1) The proposed development is situated in a relatively remote location, with poor sustainable travel opportunities to most every day activities (with the exception of rural recreation), and does not propose sufficient mitigation to enable the prioritisation of sustainable transport modes and would thereby be almost entirely reliant on the private car for access, and therefore contrary to Paras 110, and 115 a) of the NPPF, and CF16 of the Epsom and Ewell Core Strategy 2007, and Healthy Streets for Surrey.

2) It has not been demonstrated that there is sufficient forward visibility for northbound traffic of right turners waiting on Langley Vale Road to turn into the site, and the proposed development would therefore lead to danger to users of the highway and therefore contrary to Para 115a of the NPPF, and meeting the criteria of paragraph 116 of the NPPF.

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Explanation for refusal: The site is located where there are very few services that are available through good public transport accessibility, or through reasonable cycle/pedestrian facilities. The only real services or activities within reasonable walking distance are a primary school and a very small and poorly stocked shop associated with a local garage, or rural pursuits such as horse riding, cycling or walking. The Government's Connectivity Index (released only to Local Authorities at the moment) shows that the site scores 42 which comes in the bottom 15 percentile of the entire population of England and Wales, which is a very poor performance for a location so near to London and its suburbs around Epsom. The developer has not demonstrated that through investment in bus service provision, and cycle and pedestrian infrastructure, they can secure a step change improvement to this very poor level of accessibility as currently exhibited, so the site is likely to remain almost entirely reliant upon the private car, and unable to prioritise sustainable transport modes. Unless the measurement of connectivity can be significantly improved to a level approximately above a score of 70 which falls within the 60th to 100th percentile range, the County Council remain of the view that the location should not serve a significant increase in residential development.

In terms of visibility of right turning traffic into the site, for those travelling northbound on Langley Vale Road, there is insufficient forward visibility on this downhill section of carriageway due to dense vegetation on the inside of the bend.

The Applicant has since submitted an updated "Enhanced Sustainable Transport Strategy" (ESTS) and the Epsom & Ewell BC have requested the CHA's review of this and an updated response. In addition, the CHA notes the various additional response from stakeholders to this application.

Having reviewed the ESTS, the CHA have the following comments:

The content of the ESTS still doesn't address the fundamental issue that we have with the transport sustainability of the site, and it is still the case that the CHA believes the site will be overwhelmingly car centric in use if permission is granted. More specifically relating to elements of the Strategy:

Section 3 – Walking Improvements

The CHA welcomes improvements to pedestrian accessibility, particularly where these will lead to a range of destinations that could be used by future occupiers. Unfortunately, the proposed improvements only provide access to the immediate vicinity of the site, and the two key destinations that are easy to walk to – the primary school and the "Park & Shop" petrol station. They do not encourage access farther afield to Ashted, Epsom and Tattenham Corner where the opportunities for employment, education, leisure, health services, onward travel etc. are far more prevalent, and where most future occupiers are likely to wish to go.

As well as this, we still have the problem that the routes are rural in nature, therefore not necessarily accessible all year round, or particularly pleasant for the more vulnerable

members of society (single females, visually impaired etc.). Finally, we also need to be cognisant of the issues with the gradients in this part of Epsom & Ewell, the hills will put off a certain amount of people from walking (or cycling). So, while the walking and cycle audit do mention that key destinations are within a required distance, they do not mention the quality or topography of the routes, which are a major aspect for encouraging sustainable transport for sites such as this.

Section 4 – Cycling improvements

Again, the CHA welcomes cycling improvements, and the consideration of possible cycling opportunities. It is noted the Strategy includes upgrades to route 3 – Epsom via Headley Road – which includes possible provision of sensitive low-level lighting, advisory on-carriageway cycle lanes and wayfinding signage.

The latest “Cycle Infrastructure Design” LTN 1/20 note provides a table indicating the “Appropriate protection from motor traffic on highways” (page 33) as below:

Figure 4.1: Appropriate protection from motor traffic on highways

Speed Limit ¹	Motor Traffic Flow (pcu/24 hour) ²	Protected Space for Cycling			Cycle Lane (mandatory/ advisory)	Mixed Traffic
		Fully Kerbed Cycle Track	Stepped Cycle Track	Light Segregation		
20 mph ³	0					
	2000					
	4000					
	6000+					
30 mph	0					
	2000					
	4000					
	6000+					
40 mph	Any					
50+ mph	Any					

Provision suitable for most people

Provision not suitable for all people and will exclude some potential users and/or have safety concerns

Provision suitable for few people and will exclude most potential users and/or have safety concerns

Notes:

1. If the 85th percentile speed is more than 10% above the speed limit the next highest speed limit should be applied
2. The recommended provision assumes that the peak hour motor traffic flow is no more than 10% of the 24 hour flow
3. In rural areas achieving speeds of 20mph may be difficult, and so shared routes with speeds of up to 30mph will be generally acceptable with motor vehicle flows of up to 1,000 pcu per day

Provision of an on-carriageway cycle lane would not be appropriate for these locations given the number of cyclists who may be excluded as a result – this facility is only recommended for low traffic/20mph locations, while Headley Road at the location proposed is a narrow, rural 40mph road, routinely carrying higher speed vehicular traffic.

The provision of segregated road along this stretch would require land that is not currently available to the best of my knowledge, and as such practically delivering this provision is not likely.

In addition, no improvements have been proposed for the remainder of the route to Epsom, for example along Wilmerhatch Lane or Woodcote Green Road. As well as the lack of provision of LTN 1/20 routes, there are considerable stretches of this route that are unlit, this would also result in a lower cycling take up compared to a lit route.

Finally, I'm aware that other key destinations such as Ashted, Leatherhead and Tattenham Corner suffer similar problems as described above, and unfortunately delivery of improvements that would match current requirements are also as unlikely to come forward as those on the route to Epsom.

Section 5 Public transport improvements

It is recognised that the provision of DDRT (Digital Demand Responsive Transport) is advantageous in securing provision for areas that are not served by more frequent arterial bus routes. However, this approach cannot be used to circumvent provision of an appropriate public bus service.

In addition, such a provision would need to be anticipated to be provided in-perpetuity to guarantee the service for future occupiers. The provision of a service that is then withdrawn several years following completion of the development would not be acceptable.

Upgrading of the bus stops is welcomed and is typically secured through a S278 agreement. Such upgrades would normally be – seating, lighting, RTPI, shelter and accessible kerbing.

Summary

The site is still considered to be unsustainable in transport terms and would require an unreasonable amount of investment over an extended period to allow for future occupiers to have the opportunities to travel that are required as per Surrey County Council policy LTP4, alongside the sustainable development objectives of the NPPF 2024.

The CHA therefore considers that the reasons for a recommendation to refuse still stand.

APPLICATION NUMBER	EP/25/0846
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DEVELOPMENT AFFECTING ROADS

TOWN AND COUNTRY PLANNING GENERAL DEVELOPMENT ORDER 1992

Applicant: Fairfax Aspire Ltd

Location: Farm View, Langley Vale Road, Epsom, KT18 6AP

Development: Outline application for up to 110 dwellings including affordable homes (all matters reserved except access from Langley Vale Road)

Contact Officer	Tim Dukes	Consultation Date	22 July 2025	Response Date	5 December 2025
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Further to the previous comments and responses provided to the LPA as a result of the consultation on this application, the CHA has now had the opportunity to review the submitted updated information in relation to recommendation 2) of the original response, copied below for information:

2) It has not been demonstrated that there is sufficient forward visibility for northbound traffic of right turners waiting on Langley Vale Road to turn into the site, and the proposed development would therefore lead to danger to users of the highway and therefore contrary to Para 115a of the NPPF, and meeting the criteria of paragraph 116 of the NPPF.

The Applicant has now provided information to satisfy the CHA that sufficient forward visibility can be provided. Therefore, this element of the recommendation to refuse can be removed.

The CHA still considers the site to be located in an unsustainable location and considers a recommendation to refuse the application appropriate; however, it is noted that the decision makers, the LPA, consider wider aspects of applications over and above Highways and Transport matters. Therefore, should the LPA see fit to grant permission, the CHA requests the following be secured through a S106 agreement, and the conditions below attached to any permission granted.

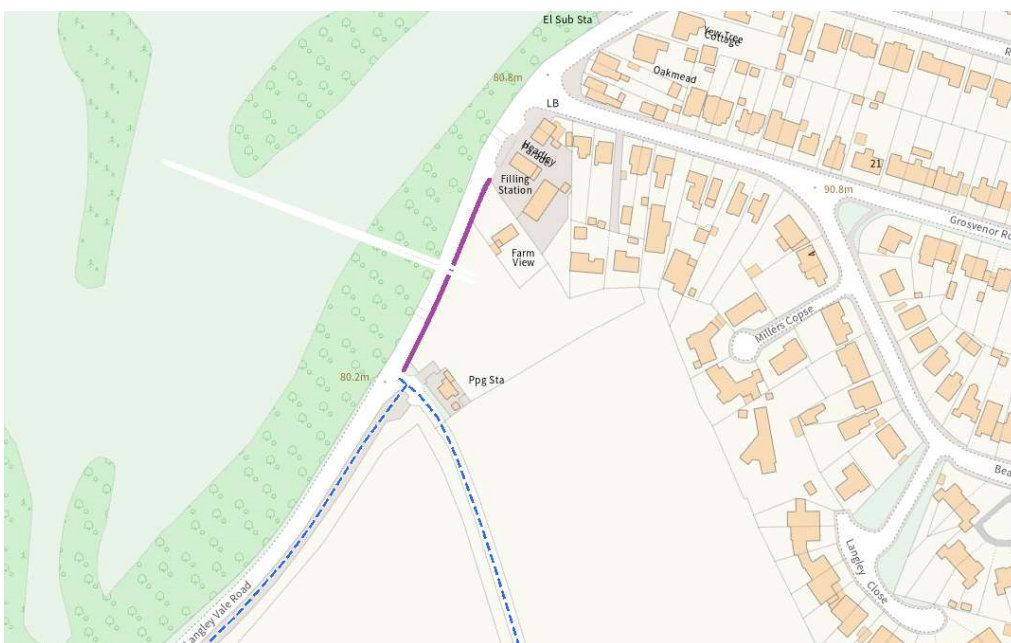
S106 Agreement

A S106 agreement should be secured to provide :

- An enhanced bus service provision to the site. This shall be provided either through DDRT (Digital Demand Response Transport) currently Surrey Connect. Or through securing/improving the existing bus service to Langley Vale – the E5 , Langley Vale – Espom – Watersedge route. A financial contribution of £200,000 per annum for a period of five years is considered appropriate given the difficulty in providing appropriate mitigation for other forms of transport (as set out in the CHA's earlier responses).
- Provision of two car club spaces and vehicles, alongside EVCPs for the use of the these vehicles, for a minimum period of three years, with three years free membership and £50 worth of driving time credit for occupiers of the new development.
- Provision of cycle vouchers for future occupiers.

In addition, the LPA also requested consideration of the unique location of the site in relation to the equestrian use of this stretch of Langley Vale Road – in particular the movements of racehorses adjacent to the site. This is an ongoing situation, and while it is not necessarily ideal, the CHAs view is that the proposed uplift in trips from the development (should it be permitted) would not generate a significant additional risk over and above that already in place. The proposed new access has also been considered in this context and given visibility splays and current guidance on access design can be provided again this would not generate additional risks.

However, the CHA does note that the frontage of the site provides possible linkages, and the potential for an extension to the bridleway network within the locale, therefore the CHA would request that consideration be given to providing additional length of the bridleway north of the junction with Ebbisham Lane towards Farm View, as highlighted in purple on the screenshot below (existing bridleways are dashed blue lines):



This could be provided as per the condition recommended below:

Conditions

1) New access

No part of the development shall be first occupied unless and until the proposed vehicular, pedestrian and cycle accesses to Langley Vale Road and the Warren have been constructed and provided with visibility zones in general accordance with the approved plans and thereafter the visibility zones shall be kept permanently clear of any obstruction over 1.05m high.

2) Provision for sustainable modes

The development hereby approved shall not be first occupied unless and until the following facilities have been provided in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority for:

- (a) The secure parking of bicycles within the development site.
- (b) The improvement of the bus stops located at Grosvenor Road and Harding Road to include provision of shelter, seating, lighting, accessible kerbing and Real Time Passenger Information (RTPI).
- (c) Information to be provided to residents regarding the availability of and whereabouts of local public transport / walking / cycling / car sharing clubs / car clubs.
- (d) A safe extension to the existing bridleway network to the frontage of the site parallel to Langley Vale Road subject to Road Safety Auditing.
- (e) Provision of widened footway/cycleway along the site frontage on Langley Vale Road.
- (f) Provision of pedestrian improvements to allow for access to local bus stops and facilities as per section 3 of the Enhanced Sustainable Transport Strategy.

and thereafter the said approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.

3) Electric vehicle charging points (EVCP)

The development hereby approved shall not be occupied unless and until each of the proposed dwellings are provided with a fully operational fast-charge Electric Vehicle charging point (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) in accordance with a scheme to be submitted and approved in writing by the Local Planning Authority and thereafter retained and maintained to the satisfaction of the Local Planning Authority.

4) Cycle parking

The development hereby approved shall not be first occupied unless and until the following cycle facilities have been provided within the development site:

- (i) High quality, secure, lit and covered cycle parking for each dwelling.
- (ii) Charging points with timers for e-bikes within said facilities;
- (iii) Clear hardstanding routes between the cycle stores and the site access

To be in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority. Thereafter the said approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.

5) Vehicle parking, loading/unloading and turning areas

The development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority for vehicles / cycles to be parked and for the loading and unloading of vehicles and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking / loading and unloading / turning areas shall be retained and maintained for their designated purposes.

6) Construction Transport Management Plan

No development shall commence until a Construction Transport Management Plan, to include details of:

- (a) parking for vehicles of site personnel, operatives and visitors
- (b) loading and unloading of plant and materials
- (c) storage of plant and materials
- (d) programme of works (including measures for traffic management)
- (e) provision of boundary hoarding behind any visibility zones
- (f) HGV deliveries and hours of operation
- (g) vehicle routing
- (h) measures to prevent the deposit of materials on the highway
- (i) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused
- (j) on-site turning for construction vehicles

has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

Reasons

The conditions are required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and in recognition of Section 9 'Promoting Sustainable Transport' in the National Planning Policy

Framework 2024.

Policy

The above conditions are required in order to meet the objectives of the NPPF (2024) and to satisfy policies DM 35, DM 36 and DM 37 of the Epsom and Ewell Borough Council Development Management Policies.

Informatives

- 1) The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).
- 2) The developer is advised that as part of the detailed design of the highway works required by the above condition(s), the County Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment.
- 3) Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant/organisation responsible for the damage.
- 4) The permission hereby granted shall not be construed as authority to carry out any works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway or any works that may affect a drainage channel/culvert or water course. In instances where the applicant is not the Highway Authority the applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see <http://www.surreycc.gov.uk/roads-and-transport/permits-and-licences/traffic-management-permit-scheme>. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice.
- 5) It is the responsibility of the developer to ensure that the electricity supply is

sufficient to meet future demands and that any power balancing technology is in place if required. Electric Vehicle Charging Points shall be provided in accordance with the Surrey County Council Vehicular, Cycle and Electric Vehicle Parking Guidance for New Development 2024. Where undercover parking areas (multi-storey car parks, basement or undercroft parking) are proposed, the developer and LPA should liaise with Building Control Teams and the Local Fire Service to understand any additional requirements. If an active connection costs on average more than £3600 to install, the developer must provide cabling (defined as a 'cabled route' within the 2022 Building Regulations) and two formal quotes from the distribution network operator showing this.

- 6) It is the responsibility of the developer to provide e-bike charging points with socket timers to prevent them constantly drawing a current over night or for longer than required. Signage should be considered regarding damaged or shock impacted batteries, indicating that these should not be used/charged. The design of communal bike areas should consider fire spread and there should be detection in areas where charging takes place. With regard to an e-bike socket in [a domestic dwelling, the residence should have detection, and an official e-bike charger should be used. Guidance on detection can be found in BS 5839-6 for fire detection and fire alarm systems in both new and existing domestic premises / in non-domestic buildings the premises should have detection, and an official e-bike charger should be used. Guidance on detection can be found in BS 5839-1 of the code of practice for designing, installing, commissioning, and maintaining fire detection and alarm systems in non-domestic buildings.]
- 7) The applicant is advised that any alterations to existing highway infrastructure should be designed so there is no adverse effect on surface water flow routes and should not increase flood risk on or off site. It is possible to check the long term flood risk on the following Government website www.gov.uk/check-long-term-flood-risk

For further information please contact the Flood Risk, Planning and Consenting Team suds@surreycc.gov.uk

Appendix B – Recommended Conditions

S106 Agreement

A S106 agreement should be secured to provide:

- An enhanced bus service provision to the site. This shall be provided either through DDRT (Digital Demand Response Transport) currently Surrey Connect. Or through securing/improving the existing bus service to Langley Vale – the E5, Langley Vale – Espom – Watersedge route. A financial contribution of £200,000 per annum for a period of five years is considered appropriate given the difficulty in providing appropriate mitigation for other forms of transport (as set out in the CHA's earlier responses).
- Provision of two car club spaces and vehicles, alongside EVCPs for the use of these vehicles, for a minimum period of three years, with three years free membership and £50 worth of driving time credit for occupiers of the new development.
- Provision of cycle vouchers to a value of £150 for future occupiers.

Conditions

7) New access

No part of the development shall be first occupied unless and until the proposed vehicular, pedestrian and cycle accesses to Langley Vale Road and the Warren have been constructed and provided with visibility zones in general accordance with the approved plans and thereafter the visibility zones shall be kept permanently clear of any obstruction over 1.05m high.

8) Provision for sustainable modes

The development hereby approved shall not be first occupied unless and until the following facilities have been provided in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority for:

- (f) The secure parking of bicycles within the development site.
- (g) The improvement of the bus stops located at Grosvenor Road and Harding Road to include provision of shelter, seating, lighting, accessible kerbing and Real Time Passenger Information (RTPI).
- (h) Information to be provided to residents regarding the availability of and whereabouts of local public transport / walking / cycling / car sharing clubs / car clubs.

- (i) A safe extension to the existing bridleway network to the frontage of the site parallel to Langley Vale Road subject to Road Safety Auditing.
- (j) Provision of widened footway/cycleway along the site frontage on Langley Vale Road.
- (f) Provision of pedestrian improvements to allow for access to local bus stops and facilities as per section 3 of the Enhanced Sustainable Transport Strategy.

and thereafter the said approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.

9) Electric vehicle charging points (EVCP)

The development hereby approved shall not be occupied unless and until each of the proposed dwellings are provided with a fully operational fast-charge Electric Vehicle charging point (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) in accordance with a scheme to be submitted and approved in writing by the Local Planning Authority and thereafter retained and maintained to the satisfaction of the Local Planning Authority.

10) Cycle parking

The development hereby approved shall not be first occupied unless and until the following cycle facilities have been provided within the development site:

- (i) High quality, secure, lit and covered cycle parking for each dwelling.
- (ii) Charging points with timers for e-bikes within said facilities;
- (iii) Clear hardstanding routes between the cycle stores and the site access

To be in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority. Thereafter the said approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.

11) Vehicle parking, loading/unloading and turning areas

The development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority for vehicles / cycles to be parked and for the loading and unloading of vehicles and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking / loading and unloading / turning areas shall be retained and maintained for their designated purposes.

12) Construction Transport Management Plan

No development shall commence until a Construction Transport Management Plan, to include details of:

- (a) parking for vehicles of site personnel, operatives and visitors
- (b) loading and unloading of plant and materials
- (c) storage of plant and materials
- (d) programme of works (including measures for traffic management)
- (e) provision of boundary hoarding behind any visibility zones
- (f) HGV deliveries and hours of operation
- (g) vehicle routing
- (h) measures to prevent the deposit of materials on the highway
- (i) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused
- (j) on-site turning for construction vehicles

has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

Reasons

The conditions are required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users and in recognition of Section 9 'Promoting Sustainable Transport' in the National Planning Policy Framework 2024.

Policy

The above conditions are required in order to meet the objectives of the NPPF (2024) and to satisfy policies DM 35, DM 36 and DM 37 of the Epsom and Ewell Borough Council Development Management Policies.

Informatives

- 8) The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).
- 9) The developer is advised that as part of the detailed design of the highway works required by the above condition(s), the County Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment.
- 10) Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the

applicant/organisation responsible for the damage.

- 11) The permission hereby granted shall not be construed as authority to carry out any works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway or any works that may affect a drainage channel/culvert or water course. In instances where the applicant is not the Highway Authority the applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see <http://www.surreycc.gov.uk/roads-and-transport/permits-and-licences/traffic-management-permit-scheme>. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice.
- 12) It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Electric Vehicle Charging Points shall be provided in accordance with the Surrey County Council Vehicular, Cycle and Electric Vehicle Parking Guidance for New Development 2024. Where undercover parking areas (multi-storey car parks, basement or undercroft parking) are proposed, the developer and LPA should liaise with Building Control Teams and the Local Fire Service to understand any additional requirements. If an active connection costs on average more than £3600 to install, the developer must provide cabling (defined as a 'cabled route' within the 2022 Building Regulations) and two formal quotes from the distribution network operator showing this.
- 13) It is the responsibility of the developer to provide e-bike charging points with socket timers to prevent them constantly drawing a current over night or for longer than required. Signage should be considered regarding damaged or shock impacted batteries, indicating that these should not be used/charged. The design of communal bike areas should consider fire spread and there should be detection in areas where charging takes place. With regard to an e-bike socket in [a domestic dwelling, the residence should have detection, and an official e-bike charger should be used. Guidance on detection can be found in BS 5839-6 for fire detection and fire alarm systems in both new and existing domestic premises / in non-domestic buildings the premises should have detection, and an official e-bike charger should be used. Guidance on detection can be found in BS 5839-1 of the code of practice for designing, installing, commissioning, and maintaining fire detection and alarm systems in non-domestic buildings.]

14)The applicant is advised that any alterations to existing highway infrastructure should be designed so there is no adverse effect on surface water flow routes and should not increase flood risk on or off site. It is possible to check the long term flood risk on the following Government website www.gov.uk/check-long-term-flood-risk

For further information please contact the Flood Risk, Planning and Consenting Team suds@surreycc.gov.uk

Appendix C – Photograph Locations

