

# Meeting Gypsy and Traveller Accommodation Needs

## Topic Paper

December 2024

**Epsom and Ewell**  
**Local Plan** 2022-2040



## Contents

1. Introduction .....	2
2. Policy background .....	2
3. Identifying future Gypsy and Traveller needs in Epsom & Ewell.....	5
4. Meeting the need .....	7
5. Existing sites.....	8
6. Expanding existing sites .....	11
7. Identifying potential new sites .....	15
Methodology.....	15
Assessment of LAA sites for Gypsy and Traveller provision .....	19
8. Investigating meeting needs outside of the borough.....	19
9. Consideration of Green Belt allocations.....	19
10. Proposed Submission Local Plan.....	20
Appendix 1: Site assessments of urban/greenfield LAA sites for potential Gypsy and Traveller provision .....	22
Appendix 2: Site assessments of submitted Green Belt sites for potential Gypsy and Traveller provision .....	27
Appendix 3: Proposed Submission Local Plan Policy S8: Gypsies, Travellers and Travelling Showpeople.....	34

# 1. Introduction

- 1.1 Epsom & Ewell Borough Council is preparing a new local plan for the borough. As part of the plan making process, the Council is required to address the needs of groups with specific housing requirements, which includes making provision for Gypsy and Traveller and Travelling Showpeople sites within the Local Plan. This document provides an overview of how the Council has addressed this issue.

# 2. Policy background

- 2.1 In its approach, the Council has been guided by the following national policy and guidance:
- [Planning Policy for Travellers Sites \(PPTS\) \(December 2023\)](#)
  - [National Planning Policy Framework \(NPPF\) \(December 2023\)](#)
  - [Planning Practice Guidance \(PPG\)](#)
- 2.2 PPTS sets out current government planning policy for traveller sites and provides guidance, alongside relevant case law, in respect of how reviews of the housing needs for Gypsies, Travellers and Travelling Showpeople should be assessed. The PPTS must be taken into account in the preparation of development plans. Local planning authorities preparing plans for and taking decisions on traveller sites should also have regard to the policies in the NPPF so far as relevant.
- 2.3 PPTS sets out in paragraph 3 that *“the Government’s overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community”*. Further detail as to the government’s aims in respect of traveller sites are provided:
- a) that local planning authorities should make their own assessment of need for the purposes of planning
  - b) to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
  - c) to encourage local planning authorities to plan for sites over a reasonable timescale
  - d) that plan-making and decision-taking should protect Green Belt from inappropriate development
  - e) to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites
  - f) that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective
  - g) for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies

- h) to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- i) to reduce tensions between settled and traveller communities in plan-making and planning decisions
- j) to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- k) for local planning authorities to have due regard to the protection of local amenity and local environment

2.4 There have been changes to the definition of gypsies and travellers for the purpose of plan making. In 2015, the PPTS altered the definition of Gypsies and Travellers to exclude those who have permanently ceased travelling. However, following a Court of Appeal decision in October 2022, the government updated the definition of 'Gypsies and Travellers' in Annex 1 of the PPTS in December 2023 to define travellers as all those of a travelling background, not just those who are currently travelling. The full definition of Gypsies and Travellers is as follows:

*“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.”*

2.6 Paragraph 10 of the PPTS sets out that in producing a local plan, local planning authorities should:

- a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites against their locally set targets
- b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15
- c) consider production of joint development plans that set targets on across authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)
- d) relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population’s size and density
- e) protect local amenity and environment.

2.7 PPTS also identifies in paragraph 11 that criteria should be set to guide land supply allocations where there is an identified need. It continues, in paragraph 13, stating that local planning authorities should ensure

that traveller sites are sustainable economically, socially and environmentally and ensure their policies:

- a) promote peaceful and integrated co-existence between the site and the local community
- b) promote, in collaboration with commissioners of health services, access to appropriate health services
- c) ensure that children can attend school on a regular basis
- d) provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment
- e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development
- f) avoid placing undue pressure on local infrastructure and services
- g) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans
- h) reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

2.8 As set out within the NPPF, paragraph 16 of PPTS clarifies that inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites in the Green Belt, whether temporary or permanent, are inappropriate development. Paragraph 17 continues; *'Green Belt boundaries should only be altered in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan making process and should be specifically allocated in the development plan as a traveller site only.'*

2.9 Paragraph 18 advises that local planning authorities should consider *'wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents. Local planning authorities should consider the scope for identifying separate sites for residential and for business purposes in close proximity to one another if mixed sites are not practical'*.

### 3. Identifying future Gypsy and Traveller needs in Epsom & Ewell

- 3.1 The Council commissioned a Gypsy and Traveller Accommodation Assessment (GTAA) in 2021 to quantify the number of Gypsy and Traveller pitches and Travelling Showpeople plots to meet identified needs to 2040. This involved engagement with the borough's Gypsy and Traveller community.
- 3.2 As the GTAA was commissioned prior to the December 2023 revision to the definition of a Gypsy and Traveller, the boroughs needs were assessed for those households that met the planning definition of a Gypsy and Traveller at the time (i.e. prior to December 2023), for any undetermined households; and for those households that did not meet the planning definition. A combination of these needs would comply with the December 2023 updated definition of a Gypsy and Traveller as set out in Annex 1 of the PPTS.
- 3.3 The GTAA found that there were 11 Gypsy or Traveller households within the borough that met the planning definition; no undetermined households that met the planning definition and 17 households that did not meet the planning definition. This resulted in the following needs being identified in the GTAA for the period 2022 to 2040:
- **10 pitches for households that met the planning definition.** This is made up of 3 concealed or doubled up households or single adults; 3 from teenagers who will need a pitch of their own in the next 5 years; and 4 from new household formation.
  - **No need from undetermined households.** Interviews were completed with households on all of the occupied pitches.
  - **8 pitches for households that did not meet the planning definition.** This is made up of 2 concealed or doubled-up households or single adults; 4 teenagers in need of a pitch of their own in the next 5 years; and 2 from new household formation.
- 3.7 In summary, the need for pitches identified for Gypsies and Travellers which meet the December 2023 definition as set out in Annex 1 of the PPTS is for **18 pitches** (2022 to 2040).
- 3.8 The need figure for those who meet the planning definition is broken down into 5-year periods below:

Years	0-5	6-10	11-15	16-18	Total
	2022-27	2027-32	2032-37	2037-40	
	12	2	3	1	18

3.9 There are no Travelling Showpeople yards within the borough so there is no identified current or future need for plots.

3.10 No need was identified for a formal public transit site in the borough.

## 4. Meeting the need

- 4.1 The Local Plan must seek to identify the provision of an additional 18 traveller pitches across the plan period to meet the need identified in the GTAA.
- 4.2 The government produced guidance (now withdrawn) on [‘Designing Gypsy and Traveller Sites’](#). This recommended that as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, parking space for two vehicles and a small garden area. The guidance is still considered to be current.
- 4.3 The GTAA also identified that none of the Gypsy and Traveller households that were interviewed on public sites as part of the assessment stated they have land to deliver a private site. As a result, it was recommended that the Council consider meeting the identified need through additional public pitches, which may be through intensification or expansion of existing public sites, or through providing a new public site.
- 4.4 A sequential approach has therefore been taken in seeking to meet the need in the following order of priority:
  1. Utilising spare capacity or intensifying existing sites within the borough.
  2. Expanding existing sites within the borough.
  3. Finding new sites within the borough.
  4. Meeting needs outside of the borough via the duty to cooperate.
  5. Assessment of Green Belt sites should exceptional circumstances be demonstrated.



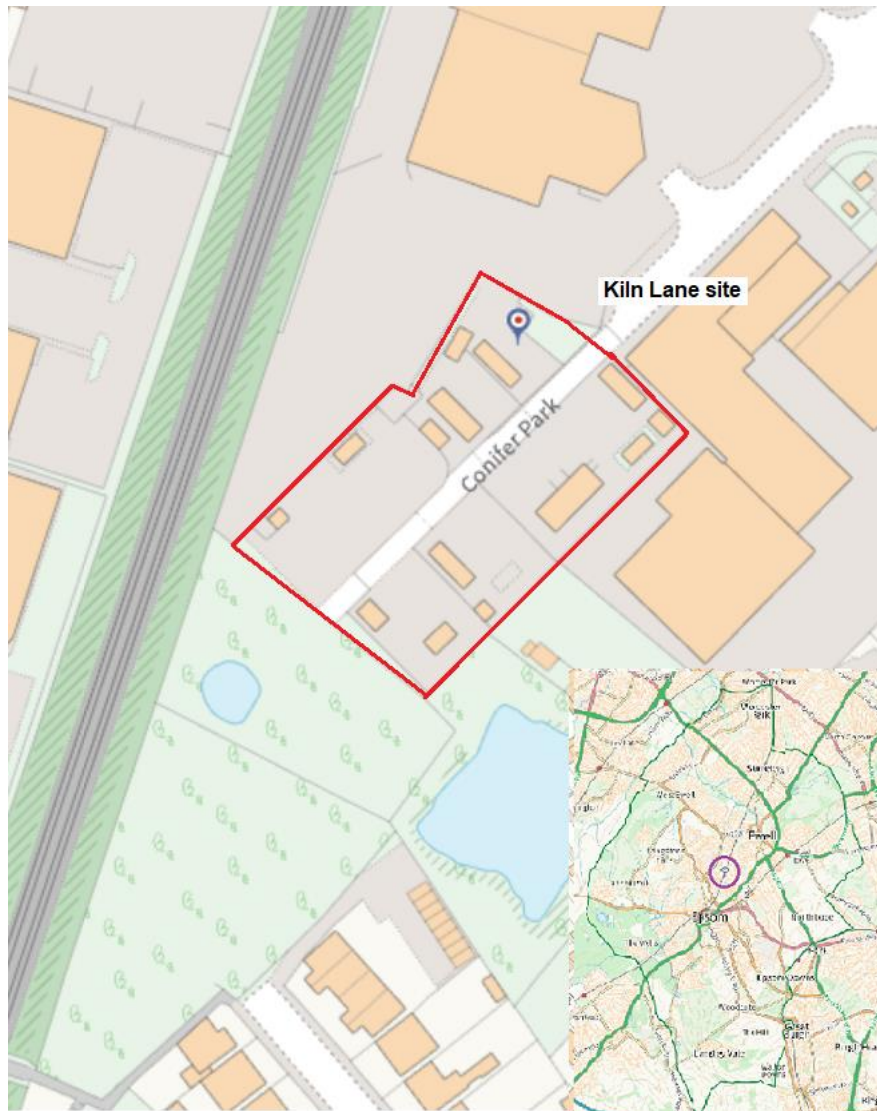
## 5. Existing sites

- 5.1 Within the borough there are two public Gypsy and Traveller sites managed by Surrey County Council. These are:
- Greenlands, Cox Lane (16 authorised pitches)
  - Kiln Lane, Epsom (7 authorised pitches).
- 5.2 There are currently none of the following within the borough:
- Private sites with permanent provision
  - Private sites with temporary permission
  - Tolerated sites, long term without planning permission
  - Unauthorised developments
  - Travelling showpeople yards
- 5.3 The locations of the two public gypsy and traveller sites are shown in Figures 1 and 2 below.
- 5.4 Surrey County Council have confirmed, most recently in November 2024, that all the existing pitches are fully occupied and overcrowded. It therefore would not be possible to accommodate any additional caravans on the existing sites due to the current overcrowding situation. This position will be monitored, although for the foreseeable future, intensifying the use of the existing public sites is unlikely to help meet the identified need.

Figure 1: Greenlands, Cox Lane, West Ewell



Figure 2: Kiln Lane, Epsom



## 6. Expanding existing sites

- 6.1 The possibility of expanding the existing public sites to meet the identified need has been considered.

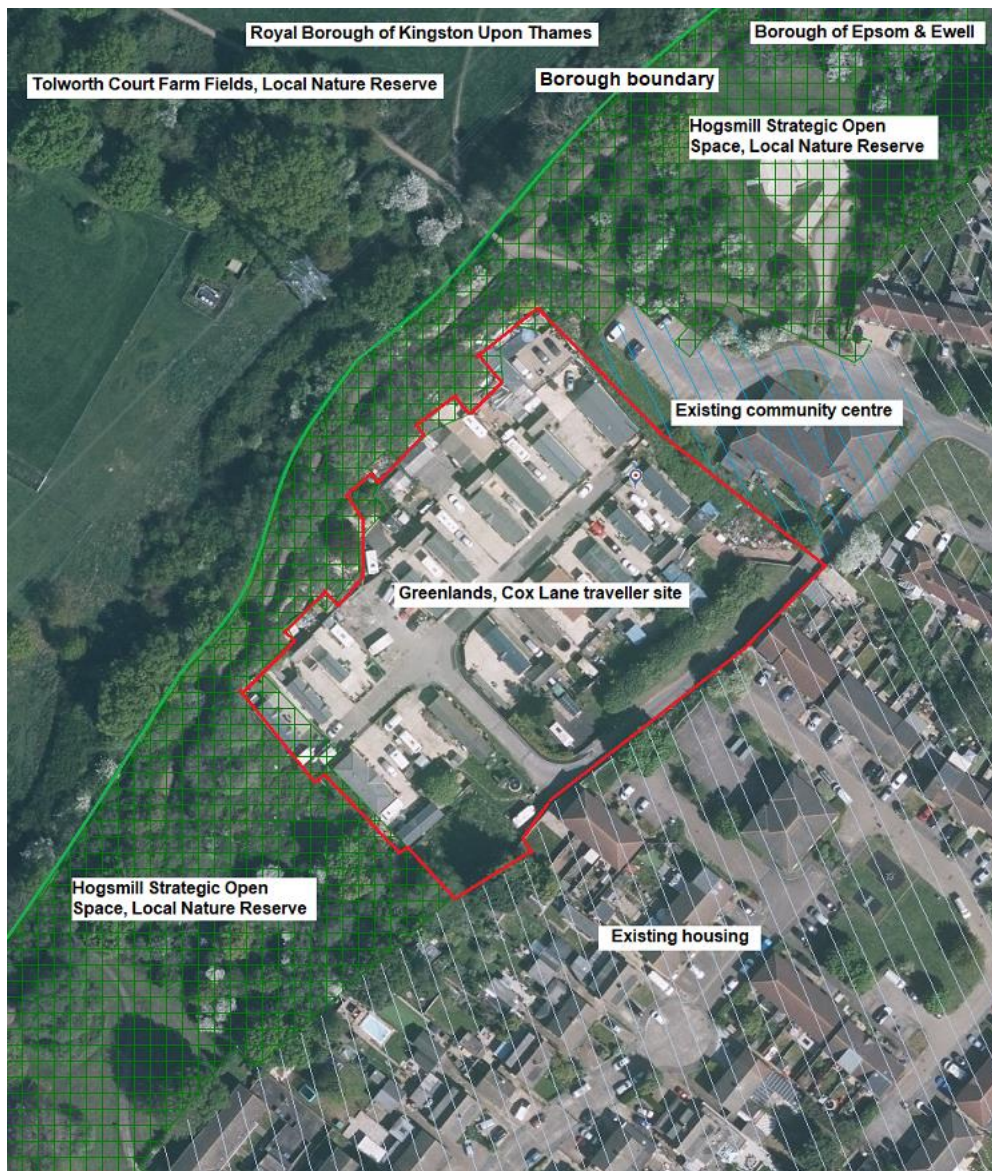
### **Greenlands, Cox Lane**

- 6.2 The Greenlands site is located towards the north-western edge of the borough boundary with the Royal Borough of Kingston Upon Thames. The location of the site in relation to the surrounding land uses is shown in figure 3.
- 6.3 To the north and west of the site is strategic open space - part of the Hogsmill open space, a local nature reserve. Due to its protected status, there is no opportunity to expand the site into the nature reserve.
- 6.4 To the south of the site is existing housing and to the east, a community centre and car park owned by the borough council. This site had been considered, for its potential within the first iteration of the Land Availability Assessment (LAA)<sup>1</sup>(2022), where it had been identified through a desktop assessment. However, the site was discounted due to being unavailable for development and was not included in the 2024 LAA update. The Cox Lane GP surgery and a day nursery operate from the community centre.

---

<sup>1</sup> The LAA is a technical study which identifies sites/broad locations and assesses the land for its development potential. While it does not determine whether a site should be allocated for development, it effectively provides a 'list' of sites to inform possible site allocations in the emerging local plan. the first iteration of the LAA was published in 2022 with an updated LAA being published in 2024.

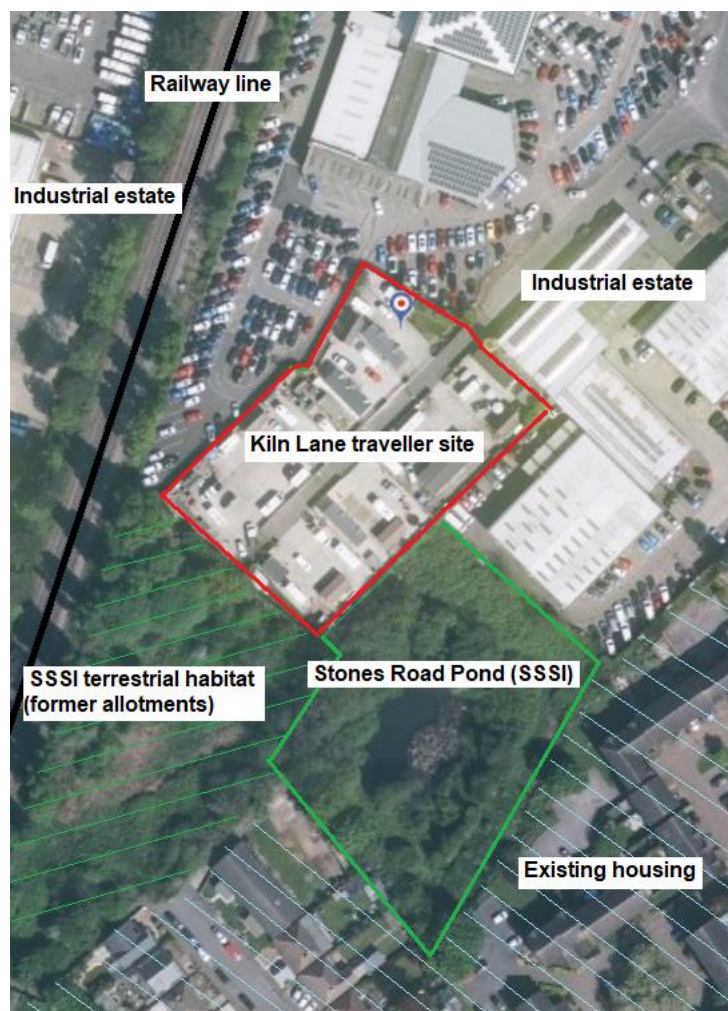
Figure 3: Greenlands, Cox lane site and surrounding area



## Kiln Lane

- 6.5 This site is located centrally in the borough, within the urban area. The location of the site in relation to the surrounding land uses is shown in figure 4.

Figure 4: Kiln Lane site and surrounding area



- 6.6 Expansion of the site to the west is restricted by the adjacent railway line.
- 6.7 To the south is the Stones Road Pond Site of Special Scientific Interest (SSSI), designated for its significant great crested newt colony. This designation precludes expansion of the Gypsy and Traveller site into this area. The SSSI itself is adjacent to a former allotment site<sup>2</sup> that serves as a terrestrial habitat to the SSSI. In 2018 when the future of the former allotment site was considered, an Ecology Survey was conducted to provide advice on the ecological significance of the

<sup>2</sup> Decision to de-designate as an allotment site was made at the 30 July 2019 Strategy & Resources Committee meeting

allotment land. This found that the great Crested Newt population at the Stones Road SSSI to be in decline. The report considered that successive development on sites surrounding the SSSI had reduced the terrestrial habitat of the newt population and concluded "...it is important that the remaining surrounding (non SSSI) habitat is protected and where possible managed for the benefit of the Great Crested Newt population...". The ecology report further advised that should the former allotment site be considered for development, an alternative receptor site for the newts would need to be found. It would need to be within the vicinity of the original habitat and be of better size and quality than the existing habitat if the necessary permissions from Natural England are to be secured. Given the location of the site, within an urban area and adjacent to an industrial site, the opportunity for suitable alternative provision is extremely limited. Therefore, the former allotment site is unlikely to accommodate the expansion of the Gypsy and Traveller site.

- 6.8 To the north of the site is the Kiln Lane industrial estate. This is a strategic employment site and employment uses are therefore protected within this area and intensification of such uses is encouraged. As part of the 2023 Call for Sites exercise three sites were submitted within the industrial estate which are in close proximity to the existing Kiln Lane traveller site. Two of the sites have been discounted on due to their small size (0.08 and 0.04ha), while the third larger site was assessed in the LAA (2024) as being suitable for mixed use development. While this site was put forward for a variety of uses, the landowner does not aspire for this site to be used for Gypsy and Traveller pitches.
- 6.9 The redevelopment of land that currently has a use (such as employment land) for gypsy and traveller accommodation is likely to prove challenging due to development viability, as the value of the existing use compared to the value of a gypsy and traveller site may not be sufficient to make the development viable for the landowner.

## 7. Identifying potential new sites

- 7.1 Given that intensification of existing pitches within the borough is not possible and that expansion is likely to be challenging within the foreseeable future, consideration is now given to finding alternative sites for Gypsy and Traveller pitch provision within the borough.
- 7.2 National policy provides limited guidance in respect of how to identify potential Gypsy and Traveller sites. The PPTS recommends that criteria should be set to guide land supply allocations where there is identified need<sup>3</sup>. The PPTS also stipulates that traveller sites should be economically, socially and environmentally sustainable.
- 7.3 In the absence of any specific guidance, the Council has established its own methodology to help identify suitable, available and deliverable/developable land to meet the Gypsy and Traveller needs for the borough.

### Methodology

- 7.4 The Council's [Land Availability Assessment \(LAA\)](#) provides the starting point for the assessment of sites suitable for Gypsy and Traveller provision, helping to identify sites. Sites will then be assessed using the methodology set out below to assess their potential for allocation as Gypsy & Traveller sites.
- 7.5 The production of the LAA closely followed the recommended process set out in the national PPG<sup>4</sup>.
- 7.6 A variety of sources were used to identify sites which were considered in the LAA. These included:
  - Existing site allocations that do not benefit from planning permission
  - Sites submitted through the call for sites process
  - Development sites that are under construction
  - Unimplemented planning permissions
  - Planning applications that have been refused or withdrawn
  - Land in the ownership of the local authority
  - Sites subject to pre-application enquiries
  - Vacant and derelict land and buildings
  - Sites where more productive use of land could be achieved. Examples include but are not limited to redevelopment of garage blocks or the subdivision
  - Surplus and likely-to-become-surplus public sector land. Such bodies will include, but not be limited to Surrey County Council

---

<sup>3</sup> Planning policy for traveller sites, Para 11

<sup>4</sup> The [LAA methodology](#) is available on the Council's website



- 7.7 Additionally, two 'Call for Sites' exercises were undertaken, the first in early 2022 to inform the first iteration of the LAA (published in 2022) and the second in 2023 to inform the updated LAA (published 2024). The Call for Sites provides individuals and organisations with the opportunity to inform the Council about sites which may have potential for development for all types of land uses including for Gypsy & Traveller uses. Sites put forward were assessed in the LAA, including those located within the Green Belt.
- 7.8 The LAA considers the suitability, availability and achievability of a range of sites in the Borough. It identifies sites which are considered to be 'deliverable' and 'developable'. As defined in the NPPF, a deliverable site is available now, offers a suitable location for development and has a realistic prospect that housing will be delivered on the site within five years. A developable site is one in a suitable location for housing development with reasonable prospect that it will be available and could be viably developed at the point envisaged. These are sites which have potential to be delivered within six to 15 years.
- 7.9 The LAA is therefore considered to provide a comprehensive list of potential sites for Gypsy and Traveller provision. As identified in the government guidance on 'Designing Gypsy and Traveller Sites' (now withdrawn), paragraph 3.6 "*sites should not be identified for Gypsy and Traveller use in locations that are inappropriate for ordinary residential dwellings, unless exceptional circumstances apply*". The sites will be reviewed in terms of their potential for gypsy and traveller use, with particular attention to the considerations outlined below. The sites identified as deliverable will be assessed first, followed by those identified as being developable, followed by a brief assessment of those discounted sites should the first two categories not yield sufficient sites to meet the identified Gypsy and Traveller needs.

## Site size

- 7.10 The size of a Gypsy and Traveller pitch may vary, based on the size, needs and demographics of the families that are resident on site. However, it is considered appropriate to identify a minimum site size to avoid unnecessary assessment being undertaken of sites that have no realistic prospect of coming forward for Gypsy and Traveller use. For the purposes of this assessment, a pitch should accommodate a single household and consist of an amenity building, a large trailer (a static caravan or park home for example) and touring caravan, parking space for two vehicles and a small garden area<sup>5</sup>. The average size of an individual pitch within the borough's existing traveller sites is approximately 0.06 hectares. On these sites, a single amenity building serves two pitches. As such, it is considered that potential sites should

---

<sup>5</sup> Whilst it has now been withdrawn, the Government Guidance on Designing Gypsy and Traveller Sites makes this recommendation

have a minimum size of 0.12ha to accommodate two pitches. Sites will therefore be filtered out if they:

- i) are too small to accommodate a minimum of two pitches (sites smaller than two pitches are unlikely to be deliverable from a management perspective) and
- ii) would be incapable of accommodating pitches and plots as a result of any obvious physical constraints (for example the shape of the site).

## Suitability

- 7.11 A site can be considered suitable if it would provide an appropriate location for a Gypsy and Traveller site, when considered against relevant constraints and their potential to be mitigated. As the LAA is providing a starting point for the assessment of sites, it is considered that if the LAA considers a site to be inappropriate for ordinary residential dwellings, then it would be unsuitable for Gypsy and Traveller use, unless exceptional circumstances apply. This is in-line with the withdrawn government guidance on Designing Gypsy and Traveller Sites.
- 7.12 The LAA will have filtered out sites which are wholly affected by primary constraints. Within the Borough of Epsom & Ewell, primary constraints are identified as:
- i) Sites of Special Scientific Interest (SSSI), which are nature designations protected by law; and
  - ii) Areas at risk from fluvial flooding, specifically flood zones 3b and 3a.
- 7.13 It is noted that the PPG classifies 'caravans, mobile homes and park homes intended for permanent residential use' as 'highly vulnerable' in terms of their flood risk vulnerability. An exception test would be required for accommodating Gypsy and Traveller sites in flood zone 2.
- 7.14 National policy constraints are also a consideration, notably Green Belt designations. Within the borough of Epsom & Ewell, sites are generally either 'urban' or 'green belt'. In relation to green belt land, National Policy states the following:
- 7.15 *"Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development unless the exceptions set out in chapter 13 of the National Planning Policy Framework apply."* (Paragraph 16)
- 7.16 *"Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to*

*meet a specific, identified need for a traveller site, it should do so only through the plan making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.” (Paragraph 17)*

- 7.17 As such, the plan making process does provide the opportunity for making limited alterations to the Green Belt boundary to meet a specific, identified need for a traveller site. However, the preference would be for sites to be located within the existing urban area. The LAA has assessed the potential of Green Belt sites.

### **Availability**

- 7.18 To be considered as having a realistic prospect of being deliverable, sites must be available for the development proposed. In some cases, it may be unclear whether a site is available for use as a Gypsy and Traveller site. Further investigation may be required prior to allocation.

### **Achievability**

- 7.19 A site will be considered ‘achievable for development’ where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time.

### **Specific PPTS considerations**

- 7.20 The PPTS contains guidance on what local planning authorities should ensure their policies deliver. For the identification of sites for Gypsy and Traveller use, the following are considered relevant:
- Promote peaceful and integrated co-existence between the site and local community
  - Promote, in collaboration with commissioners of health services, access to appropriate health services
  - Ensure children can attend school on a regular basis
  - Provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development
  - Avoid placing undue pressure on local infrastructure and services
- 7.21 For the purposes of this assessment, in general, if the LAA considers a site to be suitable for housing, then it is likely to be suitable for Gypsy and Traveller use in terms of access to infrastructure, facilities and amenities and environmental quality.

## Assessment of LAA sites for Gypsy and Traveller provision

- 7.22 All the deliverable and developable sites identified within the LAA (2024) have been assessed for their potential for the provision of Gypsy and Traveller sites. All these sites are within the urban area or on greenfield sites outside of the Green Belt. The assessment is available in Appendix 1.
- 7.23 To summarise the assessment:
- There were no sites put forward under the 'Call for Sites' exercises for Gypsy and Traveller use.
  - None of the deliverable sites were considered to have potential for Gypsy and Traveller provision
  - None of the developable sites were considered to have potential for Gypsy and Traveller provision

## 8 Investigating meeting needs outside of the borough

- 8.1 The assessment of potential sites considered within the LAA has not identified any suitable sites for Gypsy and Traveller pitch provision and there is therefore likely to be an unmet need over the plan period. The Council has therefore investigated the possibility of meeting this need outside of the borough, through discussions with neighbouring authorities and other partners. These discussions are documented in the council's [Duty to Cooperate Statement of Compliance](#). The outcome of discussions to date is that no other authority is currently in a position to assist in meeting the Council's Gypsy and Traveller needs. This position will be kept under review.

## 9 Consideration of Green Belt allocations

- 9.1 The site search process has not identified any suitable, available and deliverable sites within the existing built-up area or on greenfield sites outside of the Green Belt. Nor are any of the Council's neighbouring local authorities or Duty to Cooperate partners able to assist with meeting the council's unmet needs. As such, if the future needs of the borough's Gypsy and Traveller communities are to be met within the borough, this will need to be through provision on land currently designated as Green Belt, which may be released through the local plan process, or on unidentified (windfall) sites, which may come forward during the plan period.

- 9.2 To achieve Green Belt allocations for development, it must be clearly demonstrated that exceptional circumstances exist both at the strategic and local level. This issue is considered through other evidence base documents which support the Local Plan such as the Green Belt Topic Paper: Exceptional Circumstances.
- 9.3 Several Green Belt sites were submitted as part of the Call for Site exercises and an analysis of the suitability, availability, and achievability of these sites for Gypsy & Traveller pitch provision has been undertaken. This is set out in Appendix 2. While none of the sites were put forward by the landowner / site promoter for Gypsy and Traveller uses, it is considered that some of the sites may have potential to accommodate such uses as part of a comprehensively designed scheme.

## **10 Proposed Submission Local Plan**

- 10.1 Given the need for additional Gypsy and Traveller provision within the borough and the evidence presented in this topic paper, the following approach has been taken in the Proposed Submission Local Plan.
- 10.2 The need to protect the borough's existing Gypsy and Traveller sites from being developed for alternative uses is recognised and is addressed in policy S8 (reproduced in Appendix 3), which safeguards the existing sites.
- 10.3 To help meet the additional need for sites, the council has sought to increase pitch provision over the plan period through the allocation of 10 pitches as part of the Horton Farm Allocation (Site Allocation 35).
- 10.4 As there are no further allocations within the Local Plan for Gypsy and Traveller sites, there remains an unmet need over the plan period for eight pitches. Further provision of Gypsy and Traveller sites may be achieved on appropriate unallocated land through the planning application process, particularly where households wish to meet direct family need within existing sites or family circumstances change and new households are formed requiring new sites. Policy S8 enables such applications to be assessed on a site-by-site basis and allows suitable sites, which meet the criteria, to be permitted.
- 10.5 Additionally, Policy S8 requires larger unallocated windfall sites to make a contribution towards meeting unmet need, where appropriate.
- 10.6 The Council will continue to monitor provision for Gypsy and Travellers within the borough and will continue to work with partners to ensure that needs are being met as far as possible.



## Appendix 1: Site assessments of urban/greenfield LAA sites for potential Gypsy and Traveller provision

### Deliverable Sites (as identified in 2024 LAA)

Site Name	Size	Considered in LAA	Suitability	Availability	Achievability	Summary
7 Station Road, Stoneleigh	0.04	2022 & 2024				Discounted as too small.
Former Dairy Crest Site, 4 Alexandra Road	0.44	2022 & 2024	Brownfield. Cleared site.	Site promoted through Call for Sites for retail use.	Site owner has alternative aspirations for the site.	Site owner has alternative aspirations for this site, therefore unlikely to be available and deliverable.
35 Alexandra Road	0.10	2022 & 2024				Discounted as too small.
Gibraltar Crescent	1.79	2024	Greenfield site. Part of the site in flood zone 2 & 3	Site promoted through Call for Sites for residential/light industrial uses	Site owner has alternative aspirations for the site. Flood risk is an issue.	Site unsuitable for residential uses due to flood risk.
Blenheim House, 1 Blenheim Road	0.41	2024	Brownfield. Site is within a strategic employment site.	Site promoted through Call for Sites for housing/mixed use	Site owner has alternative aspirations for the site. Potential viability issues due to existing buildings on site.	Site suitable for employment uses due to its location within a strategic employment site.
Garages at Somerset Close & Westmorland Close	0.10	2022 & 2024				Discounted as too small.
Land rear of Rowe Hall, Salisbury Road	1.22	2022 & 2024	Greenfield site Considered suitable for residential use	Site is available, although has outline planning permission for an extra care living scheme.	Site owner has alternative aspirations for the site.	Site owner has alternative aspirations for this site, therefore unlikely to be available and deliverable.
Esso Express, 26 Reigate Road	0.25	2024	Brownfield. Disused office building and car park on site.	Site promoted through Call for Sites.	Site owner has alternative aspiration for the site.	Site owner has alternative aspirations for this site, therefore unlikely to be available and deliverable.

Etwell House, Station Road	0.20	2024	Brownfield. Vehicle repair shop on site.	Pre-application. Previous unimplemented permission for housing.	Site owner has alternative aspiration for the site.	Site owner has alternative aspirations for this site, therefore unlikely to be available and deliverable.
Hatch Furlong Nursery, east of Ewell By-Pass	0.52	2024	Brownfield.	Site promoted through Call for Sites.	Site owner has alternative aspiration for the site.	Site owner has alternative aspirations for this site, therefore unlikely to be available and deliverable.
Crane Court/Rowden Rd (Garage)	0.18	2022 & 2024	Brownfield. The irregular shape of the site and its enclosed location in an existing residential area may make it challenging to deliver pitches	Site is available, although planning history suggests its use for affordable housing.	Site contains existing affordable housing, which would need to be re-provided as part of a scheme. Potential viability issues.	Site has been assessed as being 'not suitable for allocation' within the <a href="#">Site Assessment Matrix</a> .
140-142 Ruxley Lane West Ewell Surrey KT19 9JS	0.20	2022 & 2024	Brownfield. Residential units on site	Planning appeal in progress for residential use on the site.	Site owner has alternative aspirations for the site. Site likely to be unviable for Gypsy and Traveller use.	Site owner has alternative aspirations for this site, therefore unlikely to be available or achievable.
Gas Works Site, East Street	1.54	2022 & 2024	Brownfield. Gas works infrastructure (unused), commercial buildings.	Site promoted through Call for Sites for mixed use (residential, commercial and education).	Complex site in multiple ownerships. Viability issues due to land contamination and town centre location.	Likely to be significant viability issues.
Swail House	1.05	2024	Brownfield. Self-contained specialist accommodation for the visually impaired.	Site promoted through Call for Sites.	Development will involve the replacement of the existing specialist housing. Likely to be viability issues.	Site owner has alternative aspirations for this site, therefore unlikely to be available or achievable.
79-85 East Street, Epsom	0.21	2022 & 2024	Brownfield. Existing commercial buildings on site.	Site promoted through Call for Sites for mixed use including residential and retail.	Viability issues due to existing buildings on site and proximity to the town centre	Site is unlikely to be available or achievable for Gypsy and Traveller use.



Epsom Clinic	0.17	2022 (clinic previously included alongside the former police & ambulance station) & 2024 (clinic now promoted separately)	Brownfield. Existing NHS clinic and car park on site.	Site promoted through Call for Sites.	Viability issues due to existing buildings on site and proximity to the town centre	Site owner has alternative aspirations for this site, therefore unlikely to be available or achievable.
Finachem House, 2-4 Ashley Road	0.12	2022 & 2024	Brownfield. Existing commercial buildings on site.	Site promoted through Call for Sites for housing and commercial use.	Viability issues due to existing buildings on site and proximity to the town centre.	Site is unlikely to be available or achievable for Gypsy and Traveller use.
Corner of Kiln Lane & East Street (101B East Street)	0.03	2024				Discounted as too small.
Former police and Ambulance Station	0.37	2022 – previously site included the health centre which has now come forward separately. 2024 – former police and ambulance station	Brownfield. Existing buildings on site.	Site has received planning permission for specialist residential accommodation.	Viability issues due to existing buildings on site and proximity to the town centre.	Site has planning permission so is unlikely to be available for Gypsy and Traveller use.
Richards Field car park, Chessington Road	0.07					Discounted as too small.
64 South Street, Epsom	0.14	2022 & 2024	Brownfield. Builders yard with existing buildings.	Site previously promoted through the planning system for residential use.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use.
22-24 Dorking Road	0.12	2022 & 2024	Brownfield. Existing residential buildings on site	Site previously promoted for residential use.	Site owner has alternative aspirations for the site. Viability issues due to existing buildings on site.	Site is unlikely to be available for Gypsy and Traveller use.
63 Dorking Road	0.14	2024	Brownfield. Existing public house and two studio flats on site.	Pre-application.	Site owner has alternative aspirations for the site. Viability issues due to existing buildings on site.	Site is unlikely to be available for Gypsy and Traveller use.

## Developable Sites (as identified in 2024 LAA)

Site Name	Size	Considered in LAA	Suitability	Availability	Achievability	Summary
Depot Road & Upper High Street Car Parks	1.24	2022 & 2024	Brownfield. Car parks.	Site promoted through Call for Sites for housing and retail.	Viability issues due to town centre location and potential contamination issues.	Site is unlikely to be achievable due to viability issues.
Epsom Baptist Church	0.11	2022 & 2024				Discounted as too small.
Hope Lodge car park	0.39	2022 & 2024	Brownfield. Car park	Unknown	Loss of town centre parking would need to be addressed. Viability issues and town centre location.	Site is unlikely to be achievable due to viability issues.
East Street Waterworks	1.85	2022 & 2024	Part brownfield. Operational water treatment works and open land.	Site promoted through Call for Sites to rationalise water treatment works and residential.	Viability issues likely due to cost of rationalisation, potential remediation and town centre location.	Site has been assessed as being 'not suitable for allocation' within the <a href="#">Site Assessment Matrix</a> .
Town Hall & Public Car Park	0.74	2022 & 2024	Brownfield. Offices and car park.	Site promoted through Call for Sites for residential and leisure	Central town centre location. Existing buildings on site. Viability issues.	Site is unsuitable for Gypsy and Traveller use.
Hook Road Car Park	0.48	2022 & 2024	Brownfield. Multi storey car park.	Site promoted through Call for Sites for residential and leisure. Site linked to adjacent gas work site.	Town centre location. Existing buildings on site. Viability issues.	Site is unsuitable for Gypsy and Traveller use.
Rainbow Leisure Centre Car Park	0.36	2022 & 2024	Brownfield. Car park.	Site promoted through Call for Sites for residential and leisure. Site linked to adjacent gas work site.	Viability issues due to location.	Site has been assessed as being 'not suitable for allocation' within the <a href="#">Site Assessment Matrix</a> .
The Ashley Centre (full site)	3.19	2022 & 2024	Brownfield. Shopping Centre.	Site promoted through Call for Sites for mixed	Central town centre location. Existing	Site is unsuitable for Gypsy and Traveller use.



				use (residential, retail, office and leisure)	shopping centre. Viability issues.	
20 Hook Road (Solis House)	0.07					Discounted as too small.
Land at Kiln Lane (Site 3)	0.67	2024	Brownfield. Existing car showroom.	Site promoted through Call for Sites	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use.

## Appendix 2: Site assessments of submitted Green Belt sites for potential Gypsy and Traveller provision

Site Name & LAA ref	Size	Existing use	Proposed use	Suitability	Availability	Achievability	Summary
Land to west of Burgh Heath Road COL017	1.51	Agricultural grassland	Housing, Custom Build, Older persons accommodation	Existing residential uses to the north of the site. Land to the south has permission for 46 apartments with construction underway. Site has moderate accessibility to some key services/facilities, although a railway station, GP services and secondary schools are greater than a 20-minute walk.	Site promoted through Call for Sites for housing, custom build, older persons accommodation.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use.
Land East Burgh Heath Road COL019	8.82	Open pasture / grassland and housing	Housing	Site is on the edge of the urban area. Site has moderate accessibility to some key services/facilities, although a railway station, GP services and secondary schools are greater than a 20-minute walk.	Site promoted through Call for Sites for housing.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use. However, due to the size of the site, if it were to be allocated there may be some potential for Gypsy and Traveller uses to be accommodated on site as part of a comprehensive scheme.
Land near Downs Road (south-west parcel) COL020	0.77	Grazing land	Woodland linked with COL023 (COL021 WOO019)	Site adjacent to Epsom cemetery.	Site promoted through Call for Sites for woodland.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use.
Land near Downs Road (south parcel) COL021	0.80	Grazing land	Woodland linked with COL023, COL020 WOO019)	Site is adjacent to a public house. Near to Epsom racecourse.	Site promoted through Call for Sites for woodland.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use.

Clear Heights, Downs Road	0.40	Detached house	Housing	Part of the site is PDL (a detached house). Site has moderate accessibility to some key services/facilities, although secondary schools are greater than a 20-minute walk.	Site promoted through Call for Sites for housing.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use.
Land near Downs Road (east parcel) COL023	7.21	Grazing land	Housing, leisure, cultural (COL020,21, WOO019)	Site is on the edge of the urban area. Site has moderate accessibility to some key services/facilities, although secondary schools are greater than a 20-minute walk.	Site promoted through Call for Sites for housing, leisure, cultural (linked to sites COL020, COL021, WOO019)	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use. However due to the size of the site, if it were to be allocated there may be some potential for Gypsy and Traveller uses to be accommodated on site as part of a comprehensive scheme.
Hook Road Arena COU026	13.74	Open space/Events venue e.g. fireworks, car boot sale	Housing and Leisure	Site is on the edge of the urban area. Site has moderate accessibility to some key services/facilities, although town/secondary centres and GP services are greater than a 20-minute walk.	Site promoted through Call for Sites for housing and leisure uses. Council owned site which is intended to deliver a sports hub and associated facilities alongside housing.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use. However due to the size of the site, if it were to be allocated there may be some potential for Gypsy and Traveller uses to be accommodated on site as part of a comprehensive scheme if there is capacity on site.
Land south of Oak Glade HOR001	0.52	Open space	Housing	Site adjacent to residential properties to the north and a single dwelling to the south. Dense band of trees to the east. Site has moderate accessibility to some key	Site promoted through Call for Sites for housing.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use.

				services/facilities, although secondary schools and GP services are greater than a 20-minute walk.			
Hollywood Lodge HOR002	4.90	Large building (derelict) and grounds	Housing or Health	Site is part of the former hospital cluster and is within a conservation area. Small part of the site is PDL. TPOs on site. High risk of surface water flooding on parts of the site. The site has relatively poor accessibility to a number of key facilities. Site within 20m of SSSI Epsom Comon to the south.	Site promoted through Call for Sites for housing or health.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use.
Manor Park (old cricket ground) HOR003	6.20	Open space	Housing, leisure	Multiple group TPOs and individual TPOs across the site. Site is within 50m of Epsom Common SSSI. The site has relatively poor accessibility to a number of key facilities.	Site promoted through Call for Sites for housing or leisure uses.	Site owner has alternative aspirations for the site. Dense vegetation and multiple TPOs may restrict development	Site is unlikely to be available or suitable for Gypsy and Traveller use.
Land off Cuddington Glade HOR004	1.11	Vacant open space	Housing	Site surrounded by residential development. Site has moderate accessibility to some key services/facilities, although secondary schools, railway stations and GP services are greater than a 20-minute walk.	Site promoted through Call for Sites for housing.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use.
Land at West Park Hospital (south parcel) HOR006	1.93	Existing patient facilities	Housing, health care	Brownfield site – existing healthcare facilities. Within a conservation area. Group TPO & single TPOs on site. The site has relatively poor accessibility to a number of key facilities.	Site promoted through Call for Sites for housing and health.	Viability considerations. Site owner has alternative aspirations for the site.	Site is unlikely to be available or achievable for Gypsy and Traveller use.
Land at West Park Hospital (north parcel) HOR005	3.11	Existing patient facilities	Housing, health care	Brownfield site – existing healthcare facilities. Site is adjacent to a conservation area. Surface water flood risk considerations in parts of the site. Location wise the site is some distance from key facilities.	Site promoted through Call for Sites for housing and health.	Viability considerations. Site owner has alternative aspirations for the site.	Site is unlikely to be available or achievable for Gypsy and Traveller use.

Noble Park Extension HOR007	7.32	Agriculture and allotments	Housing	Allotments on site. Within a conservation area. Group TPO & single TPOs on site. Within 20m of SSSI Epsom Common to the south. The site has relatively poor accessibility to a number of key facilities.	Site promoted through Call for Sites for housing.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use.
Epsom Community Hospital, Horton Lane HOR008	1.47	Hospital	Not stated	Part of the site is PDL. Site adjacent to a SNCI (Horton Country Park). The site has relatively poor accessibility to a number of key facilities.	Site promoted through Call for Sites	Viability considerations. Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use.
Land at Horton Lane HOR009	37.89	Agriculture, farmhouse, riding school and stables	Housing, education, open space	Site adjacent to residential development to the south, east and west. Some buildings in the south-east corner of the site, including a Grade II listed building (Horton Farm House). Site adjacent to conservation area. Various surface water flood risks across the site. Site has moderate accessibility to some key services/facilities, although secondary schools, railway stations and town/secondary centres are greater than a 20-minute walk.	Site promoted through Call for Sites for housing, education and open space.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use. However due to the size of the site, if it were to be allocated there may be some potential for Gypsy and Traveller uses to be accommodated on site as part of a comprehensive scheme.
Land At Chantilly Way, Epsom HOR010	0.7	Open field	Housing/Flats	Site adjacent to HOR009. Majority of the site is within a depression/sunken compared to surrounding area. Site is within a moderately sustainable location.	Site promoted through Call for Sites for housing.	Site owner has alternative aspirations for the site. Topography of the site may present a challenge.	Site is unlikely to be available for Gypsy and Traveller use.
land south of West Cottage, Horton Lane HOR011	0.50	Open land. Former site of a detached house	Housing	Low density housing in proximity to site. Site has moderate accessibility to some key services/facilities, although secondary schools, railway stations, GP services and	Site promoted through Call for Sites for housing. Outline planning application for residential use refused (Nov 24).	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use.

				town/secondary centres are greater than a 20-minute walk.			
Clarendon Park HOR012	1.94	Open Space	Housing	Site is amenity green space serving the adjacent Clarendon Park residential estate. Group TPO & single TPOs on site. Site has moderate accessibility to some key services/facilities, although secondary schools, railway stations, GP services and town/secondary centres are greater than a 20-minute walk.	Site promoted through Call for Sites for housing.	Development would result in the loss of amenity green space. Site owner has alternative aspirations for the site.	Site has been assessed as being 'not suitable for allocation' within the <a href="#">Site Assessment Matrix</a> .
Horton Hospital (Livingstone Park) HOR014	10.58	Open space amenity land	Housing, Older persons accommodation	Site is amenity green space surrounds the Livingstone Park hospital cluster development. Part of the site is designated as a SNCI. Site has moderate accessibility to some key services/facilities, although secondary schools, railway stations, GP services and town/secondary centres are greater than a 20-minute walk.	Site promoted through Call for Sites for housing/older persons accommodation.	Development would result in the loss of amenity green space/SNCI. Site owner has alternative aspirations for the site.	Site has been assessed as being 'not suitable for allocation' within the <a href="#">Site Assessment Matrix</a> .
Land at Priest Hill, Ewell NON013	8.63	Open space, Occasional leisure use	Housing, retail, leisure, health, older persons	Limited part of the site is PDL. Site is on the edge of the urban area and adjacent to a railway station. Loss of playing pitches on site is a consideration.	Site promoted through Call for Sites for housing. Retail, leisure, health & older persons accommodation. Potential leasehold issues which may affect site availability.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use. However due to the size of the site, if it were to be allocated there may be some potential for Gypsy and Traveller uses to be accommodated on site as part of a comprehensive scheme.
Downs Farm (north parcel),	27.94	Agriculture / Farmland	Housing, park, local centre, school, employment	Limited part of the site is PDL. Adjacent to conservation area. Site has moderate accessibility to some key services/facilities, although	Site promoted through Call for Sites for housing, park,	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use. However due to the size of the



Reigate Road NON016			(linked with NON042)	secondary schools, GP services, pharmacy and town/secondary centres are greater than a 20-minute walk.	local centre, school, employment uses.		site, if it were to be allocated there may be some potential for Gypsy and Traveller uses to be accommodated on site as part of a comprehensive scheme.
Downs Farm (south parcel), Reigate Road NON042	17.92	Paddocks	Open space with new footpaths (linked with NON016)	Parts of the site are at risk of surface water flooding.	Site promoted through Call for Sites as retained paddocks with new public footpath.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use.
Drift Bridge Farm (whole site) NON021	24.02	Agricultural land and farm buildings; 1 residential unit	Mixed housing, leisure, recreation, self-build	Small section of the site contains agricultural buildings and a residential unit. Group TPO in the eastern corner of the site. Site has moderate accessibility to some key services/facilities, although secondary schools, town/secondary centres and publicly accessible green spaces are greater than a 20-minute walk.	Site promoted through Call for Sites as a retirement village; mixed use comprising residential, leisure and/or employment uses; a commercial led development or a smaller housing scheme.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use. However due to the size of the site, if it were to be allocated there may be some potential for Gypsy and Traveller uses to be accommodated on site as part of a comprehensive scheme.
Banstead Road NON038	5.98	Open land	Housing / Self-build Housing	Site surrounds a fitness centre.	Multiple site owners. Uncertainty over site availability.	Uncertainty over site availability.	Site has been assessed as being 'not suitable for allocation' within the <a href="#">Site Assessment Matrix</a> .
The Looe, Reigate Road NON040	0.41	Commercial use and single dwelling	Housing	Brownfield site. Loss of employment site would need to be considered. Site has moderate accessibility to some key services/facilities, although secondary schools, town/secondary centres, GP	Pre-application (2020) for housing indicates potential availability although some uncertainty.	Uncertainty over site availability. Site owner has alternative aspirations for the site.	Loss of employment use would need to be justified. Some uncertainty over the availability of the site.

				services and a pharmacy are greater than a 20-minute walk.			
NESCOT, Reigate Road NON041	23.08	Education use, playing fields, and sports pavilion	Leisure, Education, Local Greenspace, Community Use	Site is on the edge of the urban area and is in active education use.	Site promoted through Call for Sites for Education use, playing fields, and sports pavilion.	Site owner has alternative aspirations for the site.	Site is unlikely to be suitable or available for Gypsy and Traveller use.
Land near Downs Road (west parcel) WOO019	28.53	Grazing land	Retained Paddocks with new footpaths Linked COL023	Site in use as paddock. Group TPO on site.	Site promoted through Call for Sites for retained paddocks with new footpaths.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use.
Land North of Langley Bottom Farm WOO020	5.24	Agricultural use	Housing	Site adjoins the Langley Vale residential development to the north. Sloping site. Surface water flood risk across parts of the site. Part of site within the AGLV (Area of great Landscape Value). The site has relatively poor accessibility to a number of key facilities.	Site promoted through Call for Sites for housing.	Site owner has alternative aspirations for the site.	Site is unlikely to be available for Gypsy and Traveller use.

## Appendix 3: Proposed Submission Local Plan Policy S8: Gypsies, Travellers and Travelling Showpeople

### Safeguarding existing supply

1. Land authorised for permanent gypsy, traveller and travelling showpeople accommodation will be safeguarded from alternative development. Proposals which involve a change of use of the land or a loss of pitches or plots will not be permitted unless it can be evidenced that they are no longer required or new suitable equivalent provision is made.

### Planning applications

2. Development proposals for gypsy and traveller and travelling showpeople accommodation and ancillary buildings, will be permitted where:
  - a. The use of the land is of a scale appropriate to the location;
  - b. the site is capable of being provided with necessary on-site services;
  - c. the site is conveniently located for access to schools, medical services and other community facilities;
  - d. the site has a safe vehicular and pedestrian access from the public highway and adequate provision for parking; turning and safe manoeuvring of vehicles within the site;
  - e. the site provides adequate space for storage, play and residential amenity;
  - f. the site is not enclosed with hard landscaping, high walls or fences, to an extent that suggests deliberate isolation from the community;
  - g. the use of the land will not result in an unacceptable adverse impact upon local amenity, the existing character of the area and the natural and historic environment; and
  - h. ancillary buildings are of an appropriate scale and size.
3. Proposals for mixed residential and business activities will be assessed on a site-specific basis, taking the above criteria into account.
4. Proposals for transit gypsy and traveller accommodation will be permitted where the proposal:
  - a. complies with the above criteria (except for c);
  - b. can demonstrate it is located on an established travelling route;
  - c. provides accommodation available to all members of the Gypsy and Traveller community (i.e. it is not restricted to one family, group of friends or association).
5. Any permission granted for a gypsy and traveller and travelling showpeople site will be subject to a condition limiting occupation to gypsies and travellers and travelling showpeople, as appropriate.

### Meeting future needs within larger unallocated development sites

6. To meet the needs of Gypsy and Traveller households, accommodation will be expected to be provided on development sites of 200 C3 homes or more whilst there remains an identified unmet need within the borough. Where application sites are within Epsom town centre (as defined on the policies map) or the inclusion of Gypsy and Traveller accommodation can be demonstrated to have a significant negative impact on the efficient use of land, provision will not be expected. This will need to be robustly demonstrated.
7. The number of pitches and plots required will reflect the level of local need within the borough. However, sites will have a minimum of 3 pitches/plots and should contain the maximum number of pitches/plots that can reasonably be accommodated on the site.