

# Site Assessment Methodology

September 2024

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



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## 1. Introduction

- 1.1. This paper should be read in conjunction with the [Land Availability Assessment \(LAA\) methodology 2022](#) and [LAA 2024](#). The purpose of this paper is to demonstrate in greater detail than these documents how, through stages 1 and 2 of the LAA methodology (as prescribed in PPG para 005 ID 3-005-20190722), sites have been selected for allocation in the local plan.
- 1.2. It comprises a straightforward matrix of considerations, developed by planning officers, to assess the allocation potential of each site positively, fairly and transparently. Cumulatively, the answers to the questions in the matrix have been considered a reliable and holistic indication of each sites' 'availability', 'achievability' and 'suitability', and, with the exception of Green Belt sites (for which their exceptional circumstances are discussed in the Green Belt Review and Sustainability Appraisal), sites which have met all three tests, have been allocated in the plan.
- 1.3. It should be noted that in recognising the need for the plan to be positively prepared, the Council have deliberately applied the tests to all sites identified at stage 1, rather than only stage 2, in order to quickly provide an at-a-glance indication of site's allocation potential should any of the initial assumptions about sites 'availability' or 'achievability' change throughout the plan making process.

## 2. Justification of approach

- 2.1. Whilst planning practice guidance provides direction in how to apply the tests of 'availability', 'suitability' and 'achievability', it does not prescribe exactly how the tests should be undertaken. For example, whilst, as guidance suggests, local and national policies should be taken into consideration in assessing a site's suitability for development, interpretation of policy and exercising of the "planning balance" can lend a site assessment process vulnerable to different interpretations, unconscious bias and inconsistency. The purpose of the consideration matrix, therefore, is to provide a holistic test of allocation potential across as many indicators of the three "pillars" of planning (social, economic and environmental), as consistently as possible.
- 2.2. One way that consistency has been built into the decision-making matrix is that the majority of considerations within the matrix are quantifiable. For example, the merits of a site depend on clear geographic / spatial criteria.

## 3. Methodology

- 3.1. As a starting point, all sites have been considered allocatable unless material considerations indicate otherwise.

### Quantifiable assessment using the traffic light scoring method.

- 3.2. The quantifiable aspect of the site assessments primarily comprised the use Geographic Information System (GIS) (in other words, digital mapping) to give an accurate assessment of sites' geographic (or "spatial") credentials in relation to specific policy related variables. The majority of those questions have been measured with the aid of the Council's own "constraints" layers, which have been set locally (e.g. conservation areas), or mirror nationally designated constraints (such as SSSIs or Flood Zones). The secondary data was taken from Surrey County Council's Transport Assessment of the sites, particularly to assess accessibility and sustainability credentials.

## Traffic light scoring system

3.3. Except where the answer to a consideration is simply “yes” or “no” most considerations have been scored using a traffic light scoring system, with “green” indicating a positive tendency for allocation, “yellow” a less positive tendency for allocation and “red” a negative tendency to allocation. It should be noted, however, that whilst achieving a “red” score means a particular variable warranted a higher level of scrutiny, it would not necessarily render a site un-allocatable. In taking a positive approach to preparing the plan, the methodology has been strictly developed to determine the principle of allocation only (and not speculated heavily on the potential details of proposals). The Council recognises the intrinsic potential of design solutions to overcome development challenges. The matrix does not, therefore, include consideration of more qualitative variables such as “design and character”. However, that the methodology does flag where potential impacts on sensitive areas might be, as such indications can be deduced from some of the considerations (e.g. proximity to Conservation Areas or Listed Buildings). In some cases, extra commentary is provided to justify conclusions where considerations have achieved a “red” score.

## Green Belt Sites and Sites within flood zone 3a and 3b.

3.4. For all Green Belt sites considered ‘available’, ‘achievable’ and ‘suitable’ for development, a separate assessment will be prepared, to discuss whether “exceptional circumstances” exist to allocate these sites, in accordance with para 145 of the National Planning Policy Framework. Similarly, for sites which have been considered otherwise ‘suitable’, ‘available’ and ‘achievable’, but fall within flood zone 3a and 3b (and where an “exception test” would be required) further discussion is offered in the Level 1 and 2 Strategic Flood Risk Assessment (SFRA).

## Method of site analysis

3.5. All sites have been assessed by desktop study using satellite images and other methods such as “google street view”. This has been considered sufficient to determine a site’s suitability with regards to other considerations not covered by GIS query (e.g. topography and proximity to neighbours). An in-person site assessment has been conducted for sites deemed ‘available’.

## Considerations:

3.6. The matrix includes the following considerations:

**1) Is the site capable of accommodating 5 or more dwellings or more than 0.25ha in size in the case of non-residential development?**

- To answer this question, sites were measured using GIS and recorded. For sites being considered for residential development officers have made a general assessment based on visual assessment of GIS maps and satellite imagery.

**2) Is the site available?**

- To answer this question, officers have required definitive agreement from landowners, in writing (e.g. in response to the ‘call for sites’), that they are willing to develop or redevelop their site.

### 3) Is the site achievable?

- A presumption in favour of achievability has been applied based on information from the local plan viability assessment, and that market conditions and hope value for sites in the borough are generally favourable.

### 4) Relationship to Sites of Special Scientific Interest (SSSI) and Special Areas of Conservation (SAC)

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters and Paragraphs</i>
GIS Query against SSSI layer.	<p><b>Green:</b> Not within an SSSI or SAC Impact Risk Zone</p> <p><b>Amber:</b> Within 50-200m of Epsom Common SSSI; or within 500m of Kiln Lane SSSI; or within 5,000m of Mole Gap to Reigate Escarpment SAC</p> <p><b>Red:</b> Within 50m of Epsom Common SSSI; within Kiln Lane SSSI; or within 1,000m of Mole Gap to Reigate Escarpment SAC</p>	<b>CS3:</b> Biodiversity and Designated Nature Conservation Areas	<b>DM4:</b> Biodiversity and New Development	<p><b>S2:</b> Sustainable and viable development</p> <p><b>S14:</b> Biodiversity</p> <p><b>S17:</b> Green Infrastructure</p>	Para. 186

- A GIS query was run to determine whether a site was within a Site of Special Scientific Interest (SSSI) Impact Risk Zone or a Special Area of Conservation (SAC) Impact Risk Zone, as sourced from Natural England<sup>1</sup>. Given that national policy states that development would not normally be permitted unless the benefits of it would outweigh features of the site that make it a SSSI or SAC, all sites within a SSSI or SAC have been deemed not suitable for allocation, as the only benefit of the proposals were a minor contribution to the borough's housing need.

### 5) Relationship to Flood Zone 2

### 6) Relationship to Flood Zone 3a and 3b

<sup>1</sup> For further information on the SSSI Impact Risk Zone see the Natural England guidance here: [https://magic.defra.gov.uk/metadata\\_for\\_magic/sssi%20irz%20user%20guidance%20magic.pdf](https://magic.defra.gov.uk/metadata_for_magic/sssi%20irz%20user%20guidance%20magic.pdf)

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters and Paragraphs</i>
GIS Query against 2018 Flood Zone layers.	<b>Green:</b> Not within Flood Zone <b>Amber:</b> N/A <b>Red:</b> Within Flood Zone	<b>CS3:</b> Biodiversity and Designated Nature Conservation Areas  NB: 2018 Strategic Flood Risk Assessment 2008 Surface Water Management Plan	<b>DM19:</b> New Developments and Flood Risk	<b>S5:</b> Climate Change Mitigation and Adaptation <b>S15:</b> Flood Risk and Sustainable Drainage 2024 Strategic Flood Risk Assessment	Chapter 14

- National Planning Practice and Guidance and Standing Advice provides comprehensive direction for decision makers to determine development potential within flood zones, which have an incremental relationship to each other in terms of development restrictions. As such, it was considered only necessary to attribute a “red” or “green” score to each criteria. Those sites which scored “red” for being in flood zone 3a or 3b, and on which residential development had been proposed (being “highly vulnerable”) have been subject to further discussion in the Level 2 Strategic Flood Risk Assessment (SFRA).

#### 7) Relationship to Epsom & Ewell (E&E) Critical Drainage Areas (CDAs)

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters and Paragraphs</i>
GIS Query against 2018 Flood Zone layers.	<b>Green:</b> Not covered by any EEBC CDA <b>Amber:</b> N/A <b>Red:</b> Within an EEBC CDA	<b>CS3:</b> Biodiversity and Designated Nature Conservation Areas  NB: 2018 Strategic Flood Risk Assessment 2008 Surface Water Management Plan	<b>DM19:</b> New Developments and Flood Risk	<b>S5:</b> Climate Change Mitigation and Adaptation <b>S15:</b> Flood Risk and Sustainable Drainage 2024 Strategic Flood Risk Assessment	Chapter 14

- Epsom & Ewell Borough Council (EEBC) Critical Drainage Areas (CDAs) (distinct from Environment Agency Critical Drainage Areas) are areas which have the potential to flood from surface water and were identified in the Council’s own Surface Water Management Plan (SWMP) conducted in 2011. Because these areas are delineated clearly, it was considered only necessary to attribute a “red” or “green” score, and not an intermediary score, depending on whether a site fell within or outside of such an area. An allocation within an EEBC CDA may still be suitable, provided that appropriate mitigation measures are implemented as part of its development, which are determined (in line with EEBC local plan policy DM19 of the existing plan and S15 of the emerging plan) based on the recommendations of site specific flood risk

assessments submitted within bespoke planning applications. For this reason, a “red” score does not in itself render the principle of development unsuitable.

## 8) Relationship to Sites of Archaeological Interest

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters and Paragraphs</i>
GIS Query against Archaeology Layer	<p><b>Green:</b> No part of site within or partially within CSAI or AHAP</p> <p><b>Amber:</b> N/A</p> <p><b>Red:</b> Site within or partially within CSAI or AHAP</p>	<b>CS5:</b> The Built Environment	<b>DM8:</b> Heritage Assets	<p><b>S13:</b> Protecting the Historic Environment</p> <p><b>DM8:</b> Heritage Assets</p>	Chapter 16

- Sites of Archaeological Interest are mapped in the borough and are subject to policy requirements in the local plan. These include County Sites of Archaeological Importance (CSAI) and Areas of High Archaeological Potential (AHAP). There are no sites within or partially within CSAIs, only AHAPs. A “red” score did not necessarily discount a site on suitability grounds, because the impact on archaeology from each development will depend on the extent of that development, or on the results of any subsequent survey which would be required as part of a planning application.

## 9) Areas of Great Landscape Value (AGLV)

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters and Paragraphs</i>
GIS Query against AGLV Layer	<p><b>Green:</b> Not within nor adjacent to AGLV</p> <p><b>Amber:</b> Adjacent to AGLV (within 5m)</p> <p><b>Red:</b> Any part of site within AGLV</p>	Conserving and Enhancing Landscape Character	<b>DM5:</b> Trees and Landscape	<b>DM10:</b> Landscape Character	Chapter 15

- Areas of Great Landscape Value (AGLVs) are predominantly to the south of the borough, designated by the County. A site would score “red” if it was within an AGLV. However, this would not render an allocation unacceptable in principle, as the Council recognise the potential of design solutions to overcome visual sensitivity concerns in order to make schemes policy compliant.

## 10) Relationship to Site of Nature Conservation Interest

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters and Paragraphs</i>
GIS Query against SNCI Layer	<p><b>Green:</b> Not within nor adjacent to constraint</p> <p><b>Amber:</b> Adjacent to constraint (within 5m)</p> <p><b>Red:</b> Any part of site within constraint</p>	<b>CS3:</b> Biodiversity and Nature Conservation Areas	<b>DM4:</b> Biodiversity and New Development	<b>S14:</b> Biodiversity	Chapter 15

- Sites of Nature Conservation Interest (SNCI's) are locally designated areas for which Nature Conservation is afforded a higher weighting in decision making than otherwise would be the case. The vision of the local plan has a strong focus on the natural environment, and so sites which achieved a "red" score were given a higher degree of assessment. However, simply being within an SNCI would not render the principle of allocation unsuitable, as the impact of such a development would depend on scale, design, and the nature of the conservation interest for which the SNCI was designated.

## 11) Local Nature Reserve

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters and Paragraphs</i>
GIS Query against LNR Layer.	<p><b>Green:</b> Not within nor adjacent to Local Nature Reserve</p> <p><b>Amber:</b> Adjacent to Local Nature Reserve (within 5m)</p> <p><b>Red:</b> Any part of site within Local Nature Reserve</p>	<b>CS3:</b> Biodiversity and Nature Conservation Areas	<b>DM4:</b> Biodiversity and New Development	<b>S14</b> Biodiversity	Chapter 15

- [Local Nature Reserves](#) are locally designated areas, valued for their environmental and social/cultural quality. Being of local significance as recognised in the draft plan's vision and strategic objectives, any proposal for development within a LNR would score "red". A site within 5m of a site (approximately the width of a road), would be considered "amber". Whilst those sites beyond 5 metres were considered "green," the role of a site to facilitate the transition of biodiversity to or from LNRs were considered (e.g. those areas displaying characteristics of "nature corridors").



## 12) Tree Preservation Order (TPO) coverage

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters / Paragraphs</i>
GIS Query against TPOs, and visual estimation based on satellite images.	<p><b>Green:</b> No TPO on site.</p> <p><b>Amber:</b> 1 or more TPO on site but no more than 50% of site covered by TPO</p> <p><b>Red:</b> 50% or more of site covered by TPO.</p>	<b>CS3:</b> Biodiversity and Nature Conservation Areas.	<b>DM3:</b> Trees and Landscape.	<b>DM11:</b> Trees and Landscape.	Chapter 15

- Trees are an important asset to the borough, providing amenity, ecological and environmental value. Some trees are so important that they warrant protection under the Town and Country Planning (Tree Preservation) (England) Regulations 2012. Individual trees can be protected under a TPO, as can groups of them. Where TPOs has been identified, consideration has primarily been given to the extent of its coverage as a proportion of the overall site area it is in. This approach has been considered justified as, recognising that quantum is not the sole indicator of a TPOs importance (Individually protected trees are important in their own right), more opportunities exist for mitigation measures (such as establishment of root protection areas), where TPO coverage, as a proportion of the overall site area, is lower.

## 13) Ancient Woodland

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters / Paragraphs</i>
GIS Query against Ancient Woodland	<p><b>Green:</b> Not within nor adjacent to Ancient Woodland</p> <p><b>Amber:</b> Adjacent Ancient Woodland (within 5m)</p> <p><b>Red:</b> Within Ancient Woodland</p>	<b>CS3:</b> Biodiversity and Nature Conservation Areas.	<b>DM3:</b> Trees and Landscape.	<b>DM11:</b> Trees and Landscape.	Chapter 15

- Ancient woodland is woodland that has existed continuously since 1600, defined by maps administered by Natural England. It is an “irreplaceable habitat” defined by the National Planning Policy Framework (NPPF). As such, any sites scoring red would need to show convincing evidence that ancient woodland would not be harmed. It was also considered appropriate to highlight sites that were within 5m of ancient woodland, but this would not have resulted in the site being considered unsuitable.

#### 14) Veteran trees

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters / Paragraphs</i>
GIS Query against Veteran Trees.	<p><b>Green:</b> No veteran trees on site</p> <p><b>Amber:</b> 1 or more veteran tree on site but no more than 50% of site covered</p> <p><b>Red:</b> 50% or more of site covered by veteran trees</p>	<b>CS3:</b> Biodiversity and Nature Conservation Areas.	<b>DM3:</b> Trees and Landscape.	<b>DM11:</b> Trees and Landscape.	Chapter 15

- A veteran tree is one in its second or mature stage of life, but not old enough to be considered “ancient” according to the [Woodland Trust](#). Where veteran trees have been identified, consideration has primarily been given to the extent of its coverage as a proportion of the overall site area it is in. Similarly with the approach to TPOs, this approach has been considered justified as, recognising that quantum is not the sole indicator of importance, more opportunities exist for mitigation measures (such as establishment of root protection areas), veteran tree, as a proportion of the overall site area, is lower. Some veteran trees may be in ancient woodland, in which case the ancient woodland criteria would apply.

#### 15) Registered Park or Garden

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters / Paragraphs</i>
GIS Query against Registered Park or Garden	<p><b>Green:</b> Not within nor adjacent to Registered Park or Garden.</p> <p><b>Amber:</b> Adjacent to Registered Park or Garden (within 5m)</p> <p><b>Red:</b> Within Registered Park or Garden.</p>	<b>CS5:</b> The Built Environment	<b>DM8:</b> Heritage Assets.	<b>S13:</b> Protecting the Historic Environment <b>DM8:</b> Heritage Assets.	Chapter 16

- Parks or gardens of historic significance are registered by Historic England. They are a material consideration in the planning process, insofar as any harm to them should provide clear and convincing justification. The principle of development, in this sense, is not considered harmful in itself. However, any site within a registered park or garden would score “red,” within 5m (road’s width), “amber” and beyond, “green”.

## 16) Proximity to Conservation Areas

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters / Paragraphs</i>
GIS Query against Conservation Areas	<p><b>Green:</b> Site beyond 100m from a boundary of a Conservation Area.</p> <p><b>Amber:</b> Within 100m of a boundary of a Conservation Area.</p> <p><b>Red:</b> Within a Conservation Area</p>	<b>CS5:</b> The Built Environment	<b>DM8:</b> Heritage Assets.	<p><b>S13:</b> Protecting the Historic Environment</p> <p><b>DM8:</b> Heritage Assets.</p>	Chapter 16

- Conservation Areas, designated under the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990, are considered intrinsically sensitive because of their enhanced role in preserving the character of the borough. The matrix scored any development within a Conservation Area “red”. It is also acknowledged that whilst development may not be within a Conservation Area, there may be impacts as a result, such as views into or out of it. Therefore, a buffer of 100m was set around each Conservation Areas , to capture sites nearby. These sites achieved an “amber” score. For sites beyond 100m, a “green” score was attributed.

## 17) Proximity to Listed Buildings

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters / Paragraphs</i>
GIS Query against Listed Buildings	<p><b>Green:</b> Site beyond 100m of a Listed Building</p> <p><b>Amber:</b> Site within 100m of a Listed Building</p> <p><b>Red:</b> Listed Building on site.</p>	<b>CS5:</b> The Built Environment	<b>DM8:</b> Heritage Assets.	<p><b>S13:</b> Protecting the Historic Environment</p> <p><b>DM8:</b> Heritage Assets.</p>	Chapter 16

- These individual buildings are recognised and protected for their historic or architectural character and protected under the Planning (Listed Buildings and Conservation Areas) Act 1990. A site which includes a Listed Building has therefore been given a “red” score. In order to take into consideration the setting of Listed Buildings, sites which are within 100m of a Listed Building has been given an “amber” score and those

which don't include a Listed Building or are beyond 100m of one, will have achieved a "green" score. It is acknowledged that there may be scenarios, on major sites, where a Listed Building exists in a proportionately small part of the site. Whilst such a scenario would still qualify as "red," the context of each site would be taken into account.

### 18) Loss of amenity space / facilities

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters / Paragraphs</i>
GIS Query against parks and open space layer, review of proposal and visual assessment of satellite images of existing site attributes.	<p><b>Green:</b> No loss of amenity space / facility</p> <p><b>Amber:</b> Partial/potential loss of amenity space / facility</p> <p><b>Red:</b> Total loss of amenity space/facility.</p>	<p><b>CS4,</b> Open spaces and Green Infrastructure</p> <p><b>CS13,</b> Community, Cultural and Built Infrastructure</p>	<b>DM6:</b> Open Space Provision	<p><b>DM13:</b> Community and Cultural Facilities</p> <p><b>DM15:</b> Open Space, Sport and Recreation</p>	Chapter 8

- In some circumstances, the development of a site may result in the loss of an existing public benefit. Whilst in principle not a reason to render a site unsuitable, it is considered important that such losses are taken into account. In order to assess the extent of potential loss consideration was given to the impact of allocation on informal/formal open space or facilities (such as school / care home / youth centre). Whilst in some circumstances loss could be quantified (e.g. % loss of public open space), this assessment was complemented by a visual assessment by officers to apply an appropriate traffic light score.

### 19) Loss of parking

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters / Paragraphs</i>
Visual assessment of satellite images of existing site attributes.	<p><b>Green:</b> No loss of parking</p> <p><b>Amber:</b> Partial/potential loss of parking</p> <p><b>Red:</b> Total loss of parking.</p>	<b>CS16:</b> Managing Transport and Travel	<p><b>DM35:</b> Transport and New Development.</p> <p><b>DM36:</b> Sustainable transport for New Development</p> <p><b>DM37:</b> Parking Standards</p>	<b>S18:</b> Transport	Chapter 9

- Whilst the plan is designed to promote sustainable development and promote a variety of modes of transport, consideration has been given to the potential loss of existing parking provision on each site, which may lead to a proliferation of on street parking if not managed correctly. The

consideration was made by visual assessment of satellite images with scores allocated appropriately. However, consistent with other considerations, the potential of design solutions to overcome parking concerns has been a “golden thread” in these considerations.

## 20) Loss of commercial/industrial space

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters / Paragraphs</i>
Visual assessment of satellite images of existing site attributes.	<p><b>Green:</b> No loss of commercial/industrial space</p> <p><b>Amber:</b> Partial/potential loss of commercial/industrial space</p> <p><b>Red:</b> Total loss of commercial/industrial</p>	<b>CS11:</b> Employment provision	<p><b>DM25:</b> Development of employment premises.</p> <p><b>DM31:</b> Safeguarding small-scale retail provision.</p>	<p><b>S10:</b> Retail Hierarchy and Network</p> <p><b>DM3:</b> Primary Shopping Areas and Retail Frontages</p> <p><b>DM5:</b> Neighbourhood Parades and isolated shops</p> <p><b>S11:</b> Economic development</p>	Chapter 6 Chapter 7

- Commerce (including retail) and industry are important to the economy of the borough. Therefore, one consideration of a site’s suitability is whether the development would result in the net loss of such uses. For this consideration, a visual assessment of the site and any information submitted with a site proposal have been taken into account and a “RAG” score allocated accordingly.

## Accessibility Criteria

<b>Proximity to railway station</b>		
<b>21)</b> Walking time to nearest railway station	<b>22)</b> Cycling time to nearest railway station	<b>23)</b> Public transport time to nearest railway station
<b>Proximity to town and secondary centre</b>		
<b>24)</b> Walking time to town and secondary centres	<b>25)</b> Cycling time to town and secondary centres	<b>26)</b> Public Transport time to town and secondary centres
<b>Proximity to local GP</b>		
<b>27)</b> Walking time to local GP	<b>28)</b> Cycling time to local GP	<b>29)</b> Public Transport time to local GP
<b>Proximity to pharmacy</b>		
<b>30)</b> Walking time to nearest pharmacy	<b>31)</b> Cycling time to nearest pharmacy	<b>32)</b> Public Transport time to nearest pharmacy
<b>Proximity to primary school</b>		
<b>33)</b> Walking time to nearest primary school	<b>34)</b> Cycling time to nearest primary school	<b>35)</b> Public Transport time to nearest primary school
<b>Proximity to secondary school</b>		
<b>36)</b> Walking time to secondary school	<b>37)</b> Cycling time to secondary school	<b>38)</b> Public Transport time to secondary school
<b>Proximity to green space</b>		
<b>39)</b> Walking time to nearest Green Space	<b>40)</b> Cycling time to nearest Green Space	<b>41)</b> Public Transport time to nearest Green Space

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters / Paragraphs</i>
SCC Transport Assessment	<p><b>Green:</b> 0-10 mins</p> <p><b>Amber:</b> 10-20 mins</p> <p><b>Red:</b> 20min or above.</p>	<p><b>CS1</b> Creating Sustainable Communities</p> <p><b>CS6</b> Sustainability in New Developments</p> <p><b>CS8</b> Broad Location of Housing Development</p> <p><b>CS13</b> Community, Cultural and Built Sports Facilities</p>	<p><b>DM7:</b> Footpath, Cycle and Bridleway Network.</p> <p><b>DM34:</b> New Social Infrastructure</p> <p><b>DM36:</b> Sustainable Transport for New Developments</p>	<p><b>S1:</b> Spatial Strategy</p> <p><b>S2:</b> Sustainable and viable development.</p> <p><b>S3:</b> Making efficient use of land.</p> <p><b>S5:</b> Climate Change Mitigation and Adaptation</p> <p><b>S12:</b> Design</p> <p><b>S16:</b> Infrastructure Delivery</p> <p><b>S17:</b> Green Infrastructure</p> <p><b>DM13:</b> Community and Cultural Facilities</p>	<p>Chapter 2</p> <p>Chapter 3</p> <p>Chapter 6</p> <p>Chapter 7</p> <p>Chapter 8</p> <p>Chapter 9</p> <p>Chapter 11</p> <p>Chapter 14</p> <p>Chapter 15</p>

				<b>DM15:</b> Open Space, Sport and Recreation <b>S18:</b> Transport	
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**Cycle way**

**42)** Walking time to nearest cycle track or greenway

**43)** Cycling time to nearest cycle track or greenway

<i>Method</i>	<i>Score Criteria</i>	<i>Relevant Core Strategy Policies</i>	<i>Relevant DM Policies</i>	<i>Relevant Emerging Local Plan Policy</i>	<i>Relevant NPPF Chapters / Paragraphs</i>
Applying method employed in SCC Transport Assessment	<b>Green:</b> 0-10 mins <b>Amber:</b> 10-20 mins <b>Red:</b> 20min or above.	<b>CS1</b> Creating Sustainable Communities	<b>DM7:</b> Footpath, Cycle and Bridleway Network.	<b>S2:</b> Sustainable and viable development. <b>S5:</b> Climate Change Mitigation and Adaptation <b>S16:</b> Infrastructure Delivery <b>S18:</b> Transport	Chapter 9

- The Council consider that accessibility to services is an important determinant of a site's suitability and a good benchmark of sustainability. As well as for the environment, the mode of access to services has implications for the health and wellbeing of the population depending on the level of sedentary travel it encourages. For this reason, the accessibility scores attributed to each site by the Counties' transport assessment have been used to inform the suitability of each site.











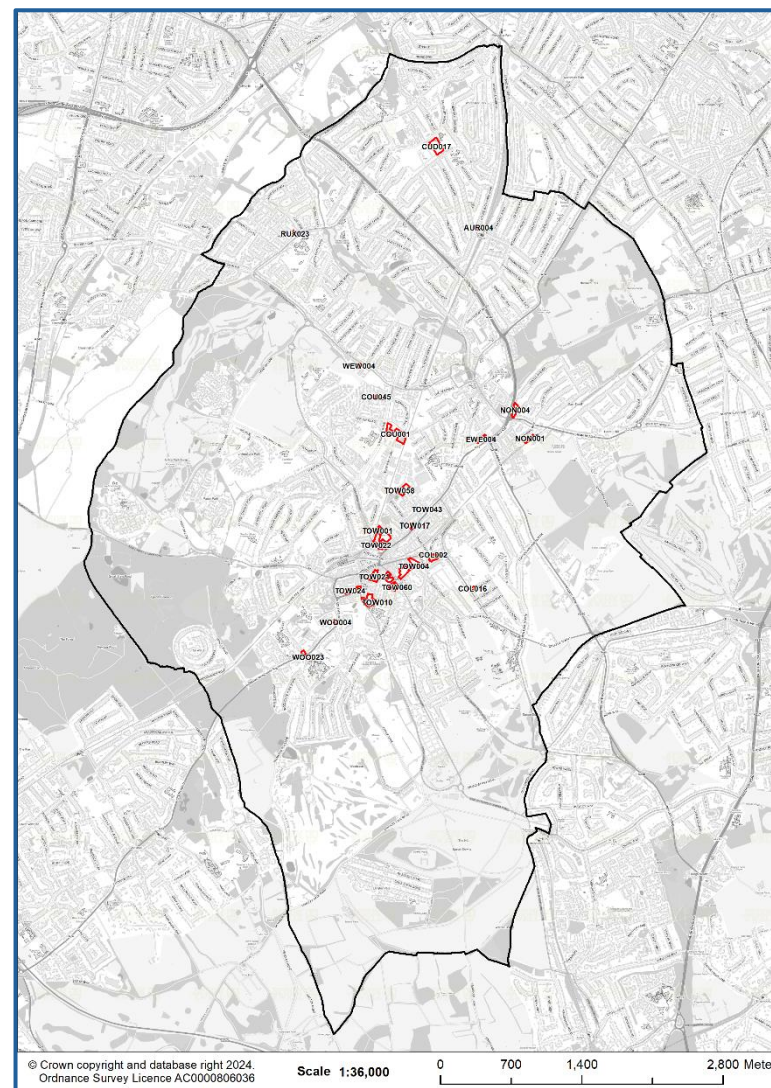




**Table 2: Sites suitable for allocation**

Site Ref	Address	Use
AUR004	1-7 Station Road, Stoneleigh	Residential / mixed-use
COL002	Former Dairy Crest Site, 4 Alexandra Road	Retail
COL016	35 Alexandra Road	Residential
COU001	Gibraltar Crescent	Light industrial
COU045	Garages at Somerset Close & Westmorland Close	Residential
CUD017	Land rear of Rowe Hall, Salisbury Road, KT4	Residential (care home)
EWE004	Ewell Autoway & Tesco Express, 26 Reigate Road	Residential
NON001	Etwelle House, Station Road	Residential
NON004	Hatch Furlong Nursery, east of Ewell By-Pass	Residential
RUX023	140-142 Ruxley Lane West Ewell Surrey	Residential
TOW001	Gas Works Site, East Street	Residential / mixed use
TOW004	Depot Road & Upper High Street Car Parks	Residential & parking
TOW009	Epsom Baptist Church	Residential
TOW010	Swail House	Residential
TOW011	Hope Lodge car park	Residential
TOW017	79-85 East Street, Epsom	Residential
TOW018	Epsom Clinic	Residential
TOW020	Finachem House, 2-4 Ashley Road	Residential / mixed use
TOW021	Town Hall	Residential
TOW022	Hook Road Car Park	Residential
TOW024	Global House	Residential
TOW043	Corner of Kiln Lane & East Street	Residential
TOW055	20 Hook Road	Residential
TOW058	Kiln Lane (site 3)	Mixed use
TOW060	Former Police Station & Ambulance Station	Residential (care home)
WEW004	Richards Field car park, Chessington Road	Residential
WOO004	64 South Street, Epsom	Residential
WOO022	22-24 Dorking Road	Residential
WOO023	63 Dorking Road	Residential

**Figure 1: Map of sites suitable for allocation**

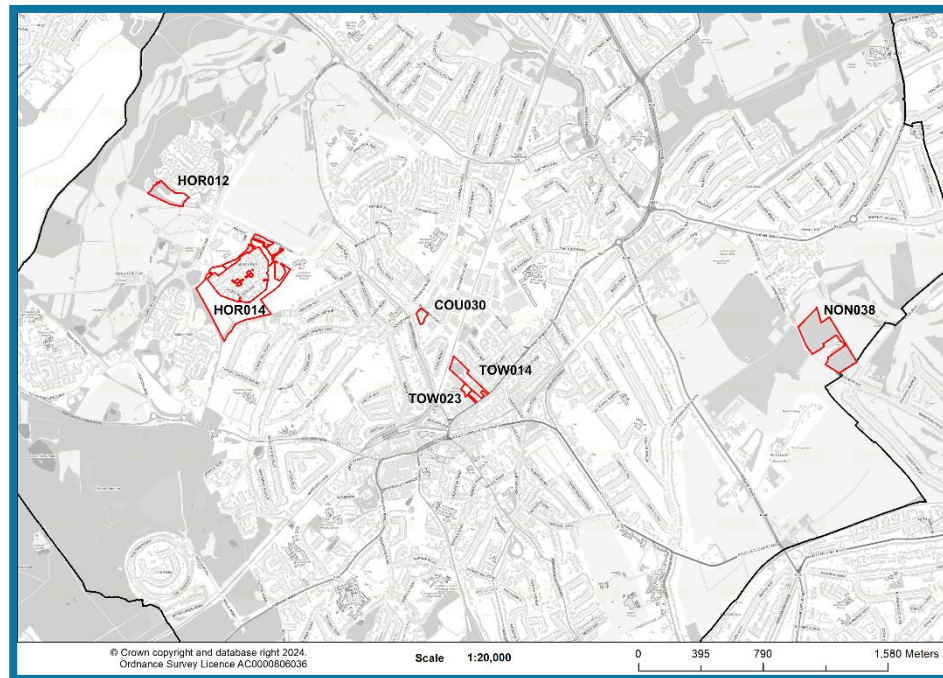


**Table 3: Sites not suitable for allocation since LAA 2024**

Site Ref	Address	Use
<b>HOR012</b>	Clarendon Park	Residential
<b>HOR014</b>	Horton Hospital / Livingstone Park	Residential
<b>NON038</b>	Banstead Road	Residential
<b>RUX005</b>	Crane Court/Rowden Rd (Garage)	Residential
<b>TOW014</b>	East Street Waterworks	Residential
<b>TOW023</b>	Rainbow Leisure Centre Car Park	Leisure

**Note:** See the Site Assessment Matrix for why they are not suitable for allocation.

**Figure 2: Map of sites not suitable for allocation since LAA 2024**

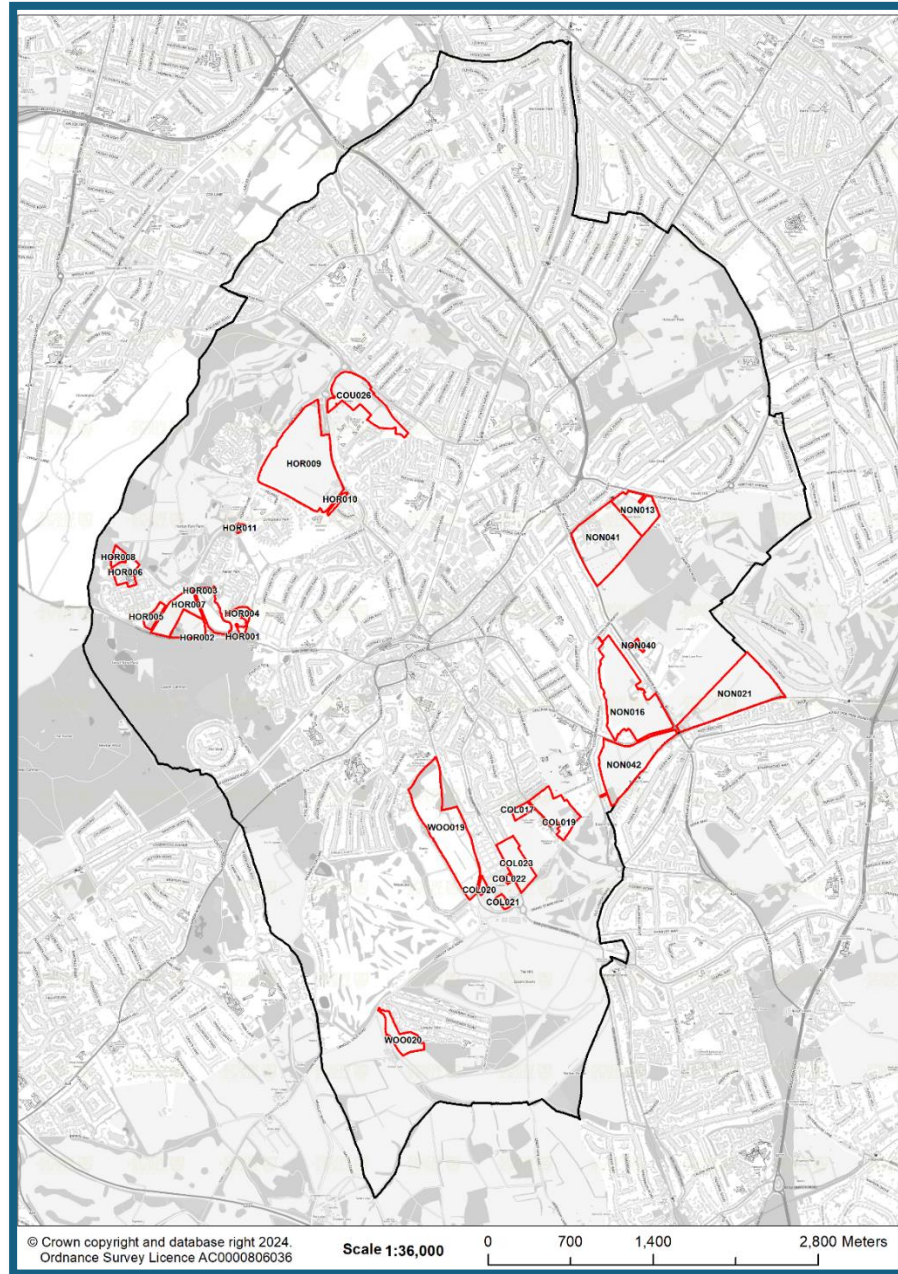


**Table 4: Sites potentially suitable for allocation but require further assessment**

<b>Site Ref</b>	<b>Address</b>	<b>Use</b>
<b>COL017</b>	Land to west of Burgh Heath Road	Residential
<b>COL019</b>	Land East Burgh Heath Road	Residential
<b>COL020</b>	Land near Downs Road (small south-west parcel)	Woodland (linked to COL023)
<b>COL021</b>	Land near Downs Road (south parcel)	Woodland (linked to COL023)
<b>COL022</b>	Clear Heights, Downs Road	Residential
<b>COL023</b>	Land near Downs Road (east parcel)	Residential (+ leisure, cultural)
<b>COU026</b>	Hook Road Arena (2)	Residential + leisure
<b>HOR001</b>	Land south of Oak Glade	Residential
<b>HOR002</b>	Hollywood Lodge	Residential (or health)
<b>HOR003</b>	Manor Park (old cricket ground)	Residential (+ leisure)
<b>HOR004</b>	Land off Cuddington Glade	Residential
<b>HOR005</b>	Land at West Park Hospital (south parcel)	Residential
<b>HOR006</b>	Land at West Park Hospital (north parcel)	Residential (+ health hub) adjacent to HOR008
<b>HOR007</b>	Noble Park Extension	Residential
<b>HOR008</b>	Epsom Community Hospital, Horton Lane	Residential (+ health hub) adjacent to HOR006
<b>HOR009</b>	Land at Horton Lane	Residential + G&T + community building + health hub + public open space
<b>HOR010</b>	Land At Chantilly Way, Epsom	Residential
<b>HOR011</b>	land south of West Cottage (hospl), Horton Lane	Residential
<b>NON013</b>	Land at Priest Hill, Ewell	Residential
<b>NON016</b>	Downs Farm (north parcel), Reigate Road	Residential, park, local centre, school, emp etc
<b>NON021</b>	Drift Bridge Farm	Mixed incl. resi, leisure, rec, self build
<b>NON040</b>	The Looe, Reigate Road	Residential
<b>NON041</b>	Nescot, Reigate Road	Leisure, Education, Local Greenspace
<b>NON042</b>	Downs Farm (south parcel), Reigate Road	Retained Paddocks with new footpaths (see NON016)
<b>WOO019</b>	Land near Downs Road (west parcel)	Retained paddocks with new footpaths (linked to COL023)
<b>WOO020</b>	Land North of Langley Bottom Farm	Residential



**Figure 3:** Map of sites potentially suitable for allocation but require further assessment



- The above list consists of sites that are potentially suitable for allocation but require further assessment, which is detailed in the Sustainability Appraisal (SA) Report. The stages of site collection, to assessment and to allocation is summarised in **Figure 4** below.

**Figure 4: Stages of site collection to allocation**

