

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

Applicant: Fairfax Aspire Ltd

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

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

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

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

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

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

Explanation for refusal: *The site is located where there are very few services that are available through good public transport accessibility, or through reasonable cycle/pedestrian facilities. The only real services or activities within reasonable walking distance are a primary school and a very small and poorly stocked shop associated with a local garage, or rural pursuits such as horse riding, cycling or walking. The Government's*

Connectivity Index (released only to Local Authorities at the moment) shows that the site scores 42 which comes in the bottom 15 percentile of the entire population of England and Wales, which is a very poor performance for a location so near to London and its suburbs around Epsom. The developer has not demonstrated that through investment in bus service provision, and cycle and pedestrian infrastructure, they can secure a step change improvement to this very poor level of accessibility as currently exhibited, so the site is likely to remain almost entirely reliant upon the private car, and unable to prioritise sustainable transport modes. Unless the measurement of connectivity can be significantly improved to a level approximately above a score of 70 which falls within the 60th to 100th percentile range, the County Council remain of the view that the location should not serve a significant increase in residential development.

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

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

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

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

Section 3 – Walking Improvements

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

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

Section 4 – Cycling improvements

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

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

Figure 4.1: Appropriate protection from motor traffic on highways

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

Notes:

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

Provision suitable for most people

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

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

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

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

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

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

Section 5 Public transport improvements

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

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

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

Summary

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

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