

Local Plan Review: Sustainability Appraisal Report



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1. Introduction

Under the [Planning and Compulsory Purchase Act 2004](#) and [Localism Act 2011](#), the Council is required to prepare a Local Plan. To ensure that the Council continued to plan positively for growth across the Borough, a decision was made in 2015 to review its Local Plan evidence base documents and update the strategic housing policies planning for the period 2015-2032 and to ensure that its policies are in accordance with national policy and guidance.

As a requirement of these Acts, the Local Plan will to be subject to Sustainability Appraisal (SA) and where relevant, must meet the requirements of the [Strategic Environmental Assessment \(SEA\) Directive 2001/42/EC](#). An essential consideration when drawing up planning documents is, therefore, their effect on the environment and people's quality of life, both now and in the future.

The aim of SA is to set out how sustainable development will be achieved through better integration of economic, environmental and social considerations into the preparation and adoption of Local Plan documents. To be effective, a SA must be fully integrated into the plan making process. The SA will be applied at each stage of document production and audit key decisions. SA will be used to monitor the effectiveness of the plan during its implementation in order to inform revisions of the plan that will be more conducive to achieving sustainable development.

An Appraisal must be conducted in line with Government guidance, 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks' (ODPM, 2005). While there have been recent changes to national planning policy, namely the introduction of the National Planning Policy Framework, this guidance is still considered relevant as it incorporates the European Directive¹ requirements for Strategic Environmental Assessment.

This Sustainability Appraisal Scoping Report (SAR) sets out how the guidelines have been followed by providing a summary of the process including:

- identifying the scope for appraisal
- undertaking an appraisal of issues and options
- producing a SAR

This paper serves as the Sustainability Appraisal Report (SAR) for Local Plan housing policies, which are the principle focus of the up-date to the Borough-wide Local Plan. The SAR sets out how a sustainability appraisal of the policy options, specifically in terms of identifying an appropriate housing strategy,

¹ Directive 2001/42/EC of the European Parliament and of the Council on the assessment of the effects of certain plans and programmes on the environment

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has been undertaken. This iteration of the SAR forms part of the Issues & Options Consultation stage of the plan-making process.

Following the preparation of the Scoping Study, this report provides the initial assessment of the strategic options. The Council will consult the relevant environmental authorities² and other interested stakeholders on this assessment.

² The Environment Agency, Historic England and Natural England

2. Epsom & Ewell Local Plan

The Epsom and Ewell Local Plan comprises a number of individual documents that together guide the future development of the Borough. Planning documents can take three forms:

Development Plan Documents (DPDs), which set out policies and proposals for the whole Borough and are subject to external examination;

- Area Action Plans, which set out policies and proposals for a defined area of the Borough and are subject to external examination;
- Supplementary Planning Documents (SPDs), which provide additional information to explain policies and proposals in more detail to assist in the preparation of planning applications.

The Council has in place an adopted Core Strategy DPD (2007), which sets out the vision and broad strategy for accommodating growth together with key policies to manage development. There is also an adopted Area Action Plan 'Plan E', which sets out specific policies to shape and guide future development within Epsom Town Centre. The Council has 3 adopted SPDs;

The Revised Developer Contributions SPD (2014), which sets out the approach of the Council with respect to the level of contributions required for affordable housing and infrastructure to support new development and;

The Revised Sustainable Design Guide SPD (2016), which provides guidance on the measures and opportunities available to developers and householders to integrate sustainability into development.

Parking Standards for Residential Development SPD (2015), provides guidance on minimum parking standards for residential development.

The National Planning Policy Framework was introduced in 2012 and replaces all of the previous national Planning Policy Statements and Guidance.

To ensure that the Council continued to plan positively for growth across the Borough, 2015 a decision has been made to review its Local Plan evidence base documents. As part of the review of the Local Plan evidence base, the Council commissioned a joint Strategic Housing Market Assessment (SHMA) with The Royal Borough of Kingston upon Thames, the Borough of Elmbridge and the District of Mole Valley. The assessment sets out housing need over a 15 year time horizon; which can be used to support planning and housing policy within each commissioning authority. It suggests an objectively assessed need (OAN) of 40,005 dwellings over the 2015-2035/7 period, or 2,000 dwellings per annum across the HMA. Kingston has the largest need (717 per annum), followed by Elmbridge (474), Epsom and Ewell, (418) and Mole Valley (391).

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The Objectively Assessed Housing Needs (OAHN) figure of 418 homes per annual 65% to be affordable, is significantly higher than Borough's current housing and affordable housing targets as adopted in Core Strategy Policies CS7 (Housing Provision) & CS9 (Affordable Housing).

Similarly an assessment of housing land supply (Strategic Housing Land Availability Assessment SHLAA) has been undertaken. This assessment has indicated that under the current Core Strategy there is insufficient housing land to deliver the OANH figure.

Through the review of the evidence base it has become clear that there is a need to update the strategic housing policies planning for the period 2015-2032 and to ensure that its policies are in accordance with national policy and guidance. The Issues and Options (Regulation 18 Consultation) sets out four potential options for directing future development in the Borough. It is important that the SA process is focused on where it can make a positive difference and add value to the decision making process (which at this stage is focused on choosing between alternatives).

3. Undertaking the Sustainability Appraisal

3.1 Stages of Sustainability Appraisal

Guidance on the preparation of Sustainability Appraisals sets out the stages of the process and how these relate and interact with the parallel plan-making processes. The stages are set out under Table 1 (see below), which taken from the guidance document “Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks” (2005).

Table 1: Stages in Sustainability Appraisal

<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p>
<p>A1: Identifying other relevant policies, plans and programmes, and environmental objectives A2: Collecting information on environmental, social and economic conditions in the Borough A3: Identifying environmental issues and problems A4: Developing the framework for sustainability appraisal A5: Consulting on the scope of the sustainability appraisal</p>
<p>Stage B: Developing and refining alternatives and assessing effects</p>
<p>B1: Testing the plan objectives against sustainability objectives B2: Developing the alternative options B3: Predicting the effects of the draft plan B4: Evaluating the effects of the draft plan B5: Considering ways of mitigating adverse effects and maximising beneficial effects B6: Proposing measures to monitor the significant environmental effects of plan implementation</p>
<p>Stage C: Preparing the Sustainability Appraisal Report</p>
<p>C1: Preparing the Sustainability Appraisal Report</p>
<p>Stage D: Consulting on the draft plan and Sustainability Appraisal Report and examination of the final plan</p>
<p>D1: Public participation D2i): Assessing significant changes prior to the final plan D2ii): SAR to support submission of the final plan D3: Making decisions and providing information</p>
<p>Stage E: Monitoring the significant effects of implementing the Plan</p>
<p>E1: Finalising aims and methods for monitoring E2: Responding to adverse effects</p>

3.2 Developing the Scope and Methodology






During 2010 the Borough Council produced and consulted upon a ‘Scoping Report’ for the sustainability appraisal for the ‘Delivery DPD’. While the bulk of this scoping report remains relevant the Council has taken the opportunity to refresh and update the scoping report, taking into account joint work carried out by the East Surrey authorities. The Scoping report relates to stage A of the sustainability appraisal process (as set out in table 1 above) and provides the framework for the appraisal of the emerging options and policies.

This Document takes up the appraisal process from Stage B onwards. It will be used to inform the development of the submission version of the Housing Policies Update and associated site allocations.

3.3 Overview and Summary of the Options and the Appraisal

As set out in the Scoping Report each of the potential options has been appraised against the 16 sustainability objectives assisted by the use of decision aiding questions. The mechanism for scoring is as follows:

Table 2: Sustainability Appraisal Scoring Mechanism

Symbol	Effects against the sustainability appraisal objectives	Description
	Significantly positive contribution towards sustainability	The option strongly supports the achievement of the SA Objective and has a major positive effect with relation to characteristics of the effect and the sensitivity of the receptors.
	Positive contribution towards sustainability	The option generally supports the achievement of the SA Objective and has a minor positive effect with relation to characteristics of the effect and the sensitivity of the receptors.
	Neutral / Uncertain contribution towards sustainability	The option does not have an effect on the achievement of the SA Objective.
	Negative contribution towards sustainability	The option conflicts with the achievement of the SA Objective and has a negative effect with relation to characteristics of the effect and the sensitivity of the receptors.
	Significantly negative contribution towards sustainability	The option conflicts with the SA Objective and has a negative effect with relation to characteristics of the effect and the sensitivity of the receptors. In addition the future baseline indicates a worsening trend in the absence of intervention.

?	Uncertain	It is unclear whether there is the potential for a negative or positive effect on the SA Objective.
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Assessments are considered in the short, medium and long term and commentary provided should any additional issues or mitigating measures be identified.

The Issues and Options paper contains four strategic options for the future strategy of housing delivery within the Borough.

Option 1: Urban intensification

- Increase development density to around 200 homes per hectare across all potential housing sites in the urban area
- Use employment land for housing
- Make land swaps by building on open spaces, play pitches and allotments in the urban area and re-providing them in the Green Belt
- Allow development on garden land

Option 2: Release some Green Belt land for new homes

- Continue to build on previously developed sites over the next five years
- Create a number of new areas for housing by undertaking a detailed review of the Green Belt to identify areas potentially suitable for new homes and supporting infrastructure to meet the shortfall in housing need

Option 3: Significant Green Belt release to meet all our housing need and more

- Continue to build on previously developed sites over the next five years
- Seek to extensively amend the Green Belt land not protected by environmental designation (primary constraints)
- Release enough Green belt land to meet the large majority of the new homes needed
- Seek to take some of our neighbours unmet housing need

Option 4: Finding the balance

- Continue to build on previously developed sites over the next five years
- Increase densities and building heights on sites in accessible locations, where it will not negatively impact on character
- Continue to protect employment land, parks, allotments and play pitches
- Create a number of new areas for housing by undertaking a detailed review of our Green Belt to identify areas potentially suitable for new homes its supporting infrastructure and where there is a clear commitment to delivery.

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It was considered that a 'do nothing' option was not a deliverable option in the context of current government legislation and guidance and therefore was not taken forward in the Issues and Options Paper or appraised as part of the Sustainability Appraisal.

4. Conclusions

Table 3: Summary of SA assessment in the short term

SA Objectives																
	Social		Environmental			Economic		Environmental								
	O1	O2	O3	O4	O5	O6	O7	O8	O9	O10	O11	O12	O13	O14	O15	O16
1	Green	Red	Orange	Green	Dark Green	Orange	Orange	Orange	Green	Orange	Red	?	Green	Orange	Green	Orange
2	Orange	Yellow	Green	Green	Green	Yellow	Yellow	Orange	Green	Green	Orange	?	Green	Yellow	Yellow	Yellow
3	Orange	Yellow	Orange	Green	Green	Yellow	Yellow	Orange	Green	Green	Orange	?	Green	Yellow	Yellow	Yellow
4	Orange	Green	Green	Green	Dark Green	Yellow	Yellow	Orange	Green	Green	Orange	?	Green	Yellow	Yellow	Yellow

Table 4: Summary of SA assessment in the medium term

SA Objectives																
	Social		Environmental			Economic		Environmental								
	O1	O2	O3	O4	O5	O6	O7	O8	O9	O10	O11	O12	O13	O14	O15	O16
1	Green	Red	Red	Yellow	Dark Green	Orange	Orange	Orange	Green	Orange	Red	?	Green	Orange	Yellow	Orange
2	Green	Yellow	Yellow	Yellow	Orange	Yellow	Yellow	Orange	Green	Green	Orange	?	Orange	Orange	Orange	Orange
3	Green	Yellow	Red	Yellow	Orange	Yellow	Yellow	Orange	Green	Green	Orange	?	Orange	Orange	Orange	Orange
4	Green	Green	Yellow	Green	Yellow	Yellow	Yellow	Orange	Green	Green	Orange	?	Yellow	Orange	Orange	Orange

Table 5: Summary of SA assessment in the long term

SA Objectives																
	Social		Environmental			Economic		Environmental								
	O1	O2	O3	O4	O5	O6	O7	O8	O9	O10	O11	O12	O13	O14	O15	O16
1	Green	Red	Red	Orange	Dark Green	Red	Red	Orange	Green	Red	Red	?	Green	Red	Orange	Red
2	Green	Yellow	Yellow	Orange	Orange	Yellow	Yellow	Orange	Green	Green	Orange	?	Orange	Orange	Orange	Orange
3	Dark Green	Orange	Red	Red	Red	Yellow	Yellow	Orange	Green	Green	Red	?	Red	Red	Red	Red
4	Orange	Yellow	Yellow	Yellow	Orange	Yellow	Yellow	Orange	Green	Green	Orange	?	Orange	Orange	Orange	Orange

The Sustainability Appraisal provides an understanding of the possible positive and negative impacts of each Strategic Option in terms of its social, economic and environmental effects throughout the plan period. Table 3, 4 & 5 highlights the overall scoring in the short, medium and long term respectively. A copy of the full assessment and summary table can be found under Appendix 1 and 2.

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To comply with the SEA regulations it is necessary to identify any likely significant cumulative effects of the plan. A detailed cumulative effects assessment will be carried out at the draft plan stage and reported as part of the formal SA report.

The main difficulty encountered in the assessment was the lack of detail apparent in the potential approaches (please note that at this stage in the planning process it is entirely expected that the approaches do not contain such detail) which leads to a fairly broad brush assessment of this element of the strategic options assessment. This was dealt with by focusing the assessment on providing a general indication of the relative performance of the potential approaches.

Although Option 1 has positive impacts in terms of making best use of previously developed land and reducing land contamination, it has a number of major and minor negative impacts in relation to the environment and social indicators in the short, medium and long term. This is particularly applicable when considering its impacts on health and wellbeing, historic and cultural assets, flooding and climate change adaptation.

Option 3 has the most significant negative impacts of all the options presented, mostly notable in relation to environmental impacts with major negative impacts resulting in the latter years of the plan period. This is largely due to the impact of distributing development further beyond the existing built up area.

Options 2 & 4 have positive social and economic impacts and score comparatively well in these areas. Options 2 & 4 also have a number of minor negative impacts in terms of the environment. However, with its limited Green Belt release, resulting in a higher proportion of development within closer proximity to existing services and infrastructure as well as promoting the efficient use of PDL land, Option 4 is considered the most sustainable overall.

It is for this reason, the SA scoping assessment concludes that on balance, Option 4 would have the least negative impact across all the objectives throughout the next plan period. It is therefore, the preferred option in sustainability terms.

It should be noted that in some areas there were unknown effects due to limited information on the actual distribution of development and information regarding infrastructure capacity not being known at this time. This is particularly relevant to the supply of water.

As work progresses to the next stage of plan preparation, developing the preferred approach and accompanying policies, work will be undertaken to ensure any negative impacts identified in the above assessment can be adequately mitigated. This will ensure that the new housing policies for the Borough are socially, economically and environmentally sustainable.

5. Next Steps

Public consultation on the Issues & Options relating to the partial review will take place between 25 September 2017 and 6 November 2017.

5.1 Local Plan Update

The Sustainability Appraisal for the draft strategic options for the update to the Local Plan is incorporated into a wider Assessment Methodology process. Details of the Assessment Methodology process are published in a separate Sustainability Assessment Scoping Report and can be found on the Council's website³.

The SA will form an integral part of the process and will evolve alongside the update of the Local Plan. Higher-level appraisals will take place at the earlier stages and will be published alongside the draft plan. This will be reviewed and a more detailed assessment will be undertaken as the plan progresses.

Full details will be published within a SA Report at the later stages. The SA will be used as a tool alongside consultation responses to consider options and identify the preferred way forward.

Table 6: Local Plan Timetable

Key Stages	Dates
Issues & Options Consultation	September-November 2017
Consideration of Consultation Responses	December 2017
Pre-Submission Consultation	March 2018
Date of Submission to Secretary of State	May 2018
Pre-Examination Meeting	September 2018
Public Hearing	Late 2018
Estimated Date for Adoption	December 2019

³ <http://www.epsom-ewell.gov.uk/localplan>

6. Appendix 1- Summary of SA Assessment across the plan period

SA Objective	S/M/L	Option 1	Option 2	Option 3	Option 4
1) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford	S	+	-	-	-
	M	+	+	+	+
	L	+	+	++	-
2) To facilitate the improved health and wellbeing of the whole population	S		0	0	+
	M		0	0	+
	L		0	-	0
3) To conserve and enhance, archaeological, historic and cultural assets and their settings.	S	-	+	-	+
	M		0		0
	L		0		0
4) To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	S	+	+	+	+
	M	0	0	0	+
	L	-	-		0
5) To make the best use of previously developed land and existing buildings	S	++	+	+	++
	M	++	-	-	0
	L	++	-		-
6) To support economic growth which is inclusive, innovative and sustainable.	S	-	0	0	0
	M	-	0	0	0
	L		0	0	0
	S	-	0	0	0

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7) To provide for employment opportunities to meet the needs of the local economy.	M	-	0	0	0
	L		0	0	0
8) To reduce greenhouse gas emissions and move to a low carbon economy	S	-	-	-	-
	M	-	-	-	-
	L	-	-	-	-
9) To use natural resources prudently.	S	+	+	+	+
	M	+	+	+	+
	L	+	+	+	+
10) To adapt to the changing climate.	S	-	+	+	+
	M	-	+	+	+
	L		+	+	+
11) To reduce flood risk.	S		-	-	-
	M		-	-	-
	L		-		-
12) To improve the water quality of rivers and groundwater, and maintain an adequate supply of water.	S	?	?	?	?
	M	?	?	?	?
	L	?	?	?	?
13) To reduce land contamination and safeguard soil quality and quantity.	S	+	+	+	+
	M	+	-	-	0
	L	+	-		-
	S	-	0	0	0

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14) To ensure air quality continues to improve and noise and light pollution are reduced.	M	-	-	-	-
	L		-		-
15) To protect and enhance landscape character.	S	+	0	0	0
	M	0	-	-	-
	L	-	-		-
16) To conserve and enhance biodiversity.	S	-	0	0	0
	M	-	-	-	-
	L		-		-

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7. Appendix 2- Full Commentary of SA Assessment

SA Objective	Commentary	S/M/L	Option 1	Option 2	Option 3	Option 4
1) To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford	<p>Although Option 1 would significantly boost the supply of housing by meeting the housing need in full and consequently reducing homelessness by increasing the number of dwellings in the Borough, it does have a number of issues in terms of provision. It is restricted in terms of the type and size that could be delivered due to the constraints of building at high density solely in the urban area. This also applies to delivering affordable housing due to the higher costs of high density development and a lack of spaces to develop larger affordable homes. Although there is some scope for a mix of provision on land that has been relocated to the Green Belt (e.g. current parks, allotments etc.), these would also have to be at high density and it may be difficult to provide self-build / custom build housing plots and Gypsies and Travellers and Travelling Showpeople accommodation. The option could also have a negative impact upon the financial viability of housing delivery due to the limited number and size of sites available in the urban area. In addition to this, building very tall structures to accommodate the required levels of housing would have significantly higher development costs, which could reduce supply.</p> <p>Options 2, 3 & 4 would not boost housing supply in the first 5 years (as the position on the 5 year housing land supply is unlikely to change by these options).Green Belt release will only yield in the medium to long term.</p> <p>Option 2 will provide a range of unit sizes and affordable homes and would seek to deliver the full OAHN. Green Belt sites likely to be well located for infrastructure in comparison to Option 3.</p> <p>Option 3 will deliver the most amount of affordable housing as will deliver the most amount of housing overall. With the potential to assist in meeting the housing needs of other areas.</p>	S	+	-	-	-
		M	+	+	+	+
		L	+	+	++	-

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SA Objective	Commentary	S/M/L	Option 1	Option 2	Option 3	Option 4
	<p>Infrastructure costs could be higher as Green Belt sites may be more remote from existing urban areas / facilities Will deliver a range of unit sizes</p> <p>Option 4 would deliver the lowers number of homes and will not meet the OAHN figure. However, the Green Belt sites will be well located for infrastructure and services. The options would provide a range of unit sizes and some affordable but will not meet identified need.</p>					
2) To facilitate the improved health and wellbeing of the whole population	<p>Whilst access to urban greenspace is reduced in Option 1 it will be re-provided in the Green Belt which may be less accessible. Higher density living without access to urban greenspaces, private amenity space as well as smaller room sizes may be detrimental to wellbeing.</p> <p>Higher density living may increase the fear of crime and social exclusion and isolation. Urban intensification may place pressure on existing infrastructure if capacity cannot be easily increased.</p> <p>Releasing Green Belt sites in Option 2 would provide some open space as part of the development. Cost of infrastructure may be expensive but less so than Option 3.</p> <p>The delivery of more housing through Option 3 will reduce deprivation and poverty as will help meet needs (could address issues of over-crowding and under occupation). Releasing larger Green Belt sites is likely to provide open space and facilities as part of the new development. However, this may place increased pressure on facilities and assets that are not provided as part of the development such as Epsom Common and Horton Country Park.</p> <p>In addition, the volume of infrastructure required to support such a scale of development propose in Option 3 may be too expensive to provide.</p>	S	--	0	0	+
		M	--	0	0	+
		L	--	0	-	0

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SA Objective	Commentary	S/M/L	Option 1	Option 2	Option 3	Option 4
	By not delivering enough affordable housing within Option 4 the issues of deprivation and poverty will not resolve. For this volume of development supporting infrastructure will be provided. However, as this option delivers the least amount of housing pressure on existing infrastructure will be less when compared to other options.					
3) To conserve and enhance, archaeological, historic and cultural assets and their settings	<p>Through Option 1 heritage assets with statutory protection will be preserved, however increased development in the urban area will change the character and appearance of the Borough. This would significantly affect the setting and appearance of conservation area and listed buildings.</p> <p>The townscape of the urban area will be protected in Option 2 & 3 but Green Belt release could affect the overall character of the Borough. The greater the loss of open, undeveloped land (Green Belt). The more the character of the overall Borough will become more urbanised. Therefore, Option 3 would lead to a significant impact.</p> <p>Through Option 4 the character of the urban area will be protected although there would be more pressure from development when compared to Options 2 & 3. Green Belt release on a smaller scale in the mid to latter parts of the plan and where it is most appropriate to do so, will lessen the impact on wider character of the Borough.</p>	S	-	+	-	+
		M	--	0	--	0
		L	--	0	--	0
4) To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities	<p>Option 1 will significant increase the population density in the urban area and congestion will increase as a result, particularly in the long term. However existing sustainable modes of transport (e.g. stations) are already located in the urban area. Providing new homes in the existing urban area in close proximity to existing services will assist in preventing unsustainable travel patterns.</p> <p>Options 2 & 3 will increase the need to travel as Green Belt sites may be more remotely located due to larger volume of Green Belt being released under this option (proportionately more for Option 3). Fewer services and facilities likely to be within walking distance and may be too expensive to provide as part of the development.</p>	S	+	+	+	+
		M	0	0	0	+
		L	-	-	--	0

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SA Objective	Commentary	S/M/L	Option 1	Option 2	Option 3	Option 4
	<p>It is expected that in the first part of the plan period delivery will be primarily in the urban area. Option 4 seeks to maximise the number of new homes in locations which can support higher density and therefore, will have a less negative impact than Options 2 & 3.</p> <p>Within Options 2, 3 & 4 the Green Belt sites located closer to the urban area with better connectivity are likely to come forward earlier in the plan period.</p>					
5) To make the best use of previously developed land (PDL) and existing buildings	<p>Option 1 maximises the use of PDL and encourages the conversion of existing buildings across the plan period. However, the use of urban green spaces would mean development on greenfield sites.</p> <p>Option 4 would promote more efficient use of PDL in particular in the first 5 years of the plan period. Development on PDL and conversions are expected to be equal to delivery on greenfield sites during the middle stages of the plan however, they will over-take in the later years of the period as the supply of PDL declines.</p> <p>Options 2 & 3 will deliver new homes on PDL especially in the first part of the plan period, but this would be proportionally less than Options 1 & 4. As Option 3 proposes the greatest amount of greenfield development across the plan period in particular in the later period, as such, it would have the most significant negative impact.</p>	S	++	+	+	++
		M	++	-	-	0
		L	++	-	--	+
6) To support economic growth which is inclusive, innovative and sustainable	<p>Options 1, 2, 3 & 4 would all result in a larger population which can support local businesses / retail / leisure through additional spend. Housing building can provide local training opportunities. Although this could be more limited in Option 1 as high rise buildings often required specialist construction.</p> <p>Option 1 does not protect employment land and if lost would mean economic retraction/ decline for the Borough.</p>	S	-	0	0	0
		M	-	0	0	0
		L	--	0	0	0
		S	-	0	0	0

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SA Objective	Commentary	S/M/L	Option 1	Option 2	Option 3	Option 4
7) To provide for employment opportunities to meet the needs of the local economy	The loss of employment land proposed in Option 1 would lead to a loss of employment opportunities and local job opportunities would be restricted / reduced. There is a risk that Epsom would become a dormitory town. Options 2, 3 & 4 seek to protect existing employment land and are therefore considered neutral at this stage in the process.	M	-	0	0	0
		L	--	0	0	0
8) To reduce greenhouse gas emissions and move to a low carbon economy	All the options will lead to greater greenhouse gas emissions for the Borough overall. However, all have the ability to provide decentralised low-carbon development in different ways; from being thermally efficient in the layout and design or through the opportunities for decentralised energy generation. Conversion of existing buildings within Option 1 may not be able to reach as high energy efficiency standards as new build. High rise buildings may require greater quantities of steel and concrete. However higher density smaller units will consume less energy. Option 1 does reduce the need to travel and hence has greater potential to move toward a low carbon economy. A larger sites through Green Belt release could provide a critical mass of development to enable on site de-centralised energy generation. The new homes would be more energy efficient in line with building regulations. However, the locations of the sites may increase the need to travel and therefore emissions. Option 4 would likely to have a lesser impact than Options 2 & 3 in this regard as the Green Belt release is likely to be closer to the urban area.	S	-	-	-	-
		M	-	-	-	-
		L	-	-	-	-
9) To use natural resources prudently	Option 1 would require large amounts of concrete and steel to build high rise flatted development as well as under croft parking. This would not encourage the use and supply of local products and services (as it is likely to require specialist construction firms). However, this option would lead to a greater number of conversions of existing buildings. The option would	S	+	+	+	+
		M	+	+	+	+
		L	+	+	+	+

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July 2017**

SA Objective	Commentary	S/M/L	Option 1	Option 2	Option 3	Option 4
	<p>require the use of some primary resources but there could be a greater market for recycled material due to the larger amount of PDL being utilised as well as there being the potential to encourage the efficient use of mineral resources. This would also apply to Option 4 (although to a lesser extent) as it ensures efficient use of PDL.</p> <p>There could be greater opportunity to reduce the need to travel or to use sustainable forms of transport, as well as there being a lower amount of new infrastructure to be provided. The option would not in of itself minimise the production of waste, but would enable the efficient management of it close to where it arises.</p> <p>Options 2, 3 & 4 could encourage the use and supply of local products and services which may reduce the environmental impact of them. However, the options would require the use of a larger amount of primary resources (proportionate to the delivery of housing).</p> <p>Options 2 & 3 would be unlikely to promote resource efficient lifestyle choices as the potential spread-out nature of the development that would take place as part of this option would require greater amounts of land and infrastructure to service it. The option would still allow for the recycling of materials to take place but again due to the greater spread of development, waste would be less likely to be managed close to where it arose, and it would not minimise the creation of waste in the first instance.</p>					
10) To adapt to the changing climate	<p>Options 2, 3 & 4 have the ability to adapt to climate change, now and in the future, as well as having the potential to assist in protecting the residents from increased extremes of weather due to climate change depending on their design and layout. This is because the sites involved would be large enough to provide adaption schemes. They could incorporate large scale renewable energy schemes which could mitigate potential environmental impacts.</p>	S	-	+	+	+
		M	-	+	+	+
		L	--	+	+	+

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	Option 1 has a minor negative impact in the short and medium term as the size of the sites and nature of high rise development means that there is less opportunity to provide schemes to adapt to the changing climate. Building at high density with concrete and steel could also create a 'heat island effect'. However, the option could still deliver schemes that could adapt to climate change such as green roofs, solar panels and on site combined heat and power, but these would be of a much smaller scale. The loss of urban green spaces could negate adaptation schemes.					
11) To reduce flood risk	Option 1 would lead to loss of urban green spaces which could reduce natural storage. This option could incorporate some small scale SuDs such as permeable pavements and green roofs, but this will be subject to viability and space allowances. Options 2, 3 & 4 provides greater flexibility when selecting sites which could assist in managing residual risks. However the option would use a larger amount of land, some of which may currently act as a soak-aways and could affect flood risk and run-off rates on site and elsewhere. The option could however incorporate SuDS into its design which could mean it is better able to resist greater flooding extremes.	S	--	-	-	-
		M	--	-	-	-
		L	--	-	--	-
12) To improve the water quality of rivers and groundwater, and maintain an adequate supply of water	Options 1, 2, 3 & 4 will be increasing the amount of housing, water consumption will increase. Option 3 results in the greatest demand as it will be delivering the greatest number of new homes. Option 1 would put increased pressure on the existing infrastructure. Until there is a better understanding of the scale development for each option and whether Thames Water can supply the water required, the impacts of all options are unknown	S	?	?	?	?
		M	?	?	?	?
		L	?	?	?	?
13) To reduce land contamination and	Option 1- New development for housing in the urban area may create more opportunities for the remediation of contaminated land.	S	+	+	+	+
		M	+	-	-	0

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safeguard soil quality and quantity.	<p>Loss of urban green spaces could have a negative impact.</p> <p>Options 2, 3 & 4 may reduce the number of urban sites remediated due to development being more viable on non-contaminated Green Belt sites. There could also be new areas of contamination created, depending on the nature of the developments that take place. The impact will be increased for Option 3 due to the volume of development.</p> <p>Options 1, 2, 3 & 4 would have a positive in the short term as Green Belt sites will be developed later in the plan period.</p>	L	+	-	--	-
14) To ensure air quality continues to improve and noise and light pollution are reduced	<p>Option 1 would result in a significant increase of development in the urban area and would likely lead to a negative impact as it would not reduce air, noise or light pollution, particularly in the existing AQMA in Ewell Village. These levels of pollution would most likely increase rather than decrease. There is also likely to be an increase in traffic (despite the urban focus of development) due to the sheer volume of additional people living and working in the area.</p> <p>Options 2, 3 & 4 would have a negative impact as they would spread the impacts of increased noise, air and light pollution across the Borough and result in a lower number of tranquil areas due to the Green Belt land being developed (proportionate to the amount of Green Belt land being released). This would expose more people to light and noise pollution. There may be an increased level of traffic resulting from unsustainable travel patterns.</p>	S	-	0	0	0
		M	-	-	-	-
		L	--	-	--	-
15) To protect and enhance landscape character	<p>Option 1 would protect the landscape character of the Borough by keeping development within the urban are, also protecting the Green Belt and the urban fringe. There would however be impacts on urban green space as this would have to be developed to meet needs.</p> <p>Options 2, 3 & 4 would have a negative impact as the options would result in Green Belt land being released. As a result the landscape character would change becoming more urban. The degree of the impact would vary</p>	S	+	0	0	0
		M	0	-	-	-
		L	-	-	--	-

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	with Option 3 resulting in the greatest released and therefore would have a more significant impact.					
16) To conserve and enhance biodiversity.	<p>Options 1, 2, 3 & 4 would protect formally designated areas including SSSIs and SNCIs.</p> <p>Option 1 would have a minor negative impact as it would increase the fragmentation of urban habitats (for example garden land) by destroying or relocating them to areas within the Green Belt. It could secure biodiversity improvements and upgrades in the Green Belt but this would not outweigh the absolute loss and damage to ‘urban habitats’.</p> <p>Options 2, 3 & 4 would not increase the fragmentation of habitats in urban areas as urban green spaces would be protected; however there would be some loss of habitats due to the release of Green Belt land (Option 3 to a greater degree).</p>	S	-	0	0	0
		M	-	-	-	-
		L	--	-	--	-