

Sustainability Appraisal (SA) of the Epsom and Ewell Local Plan

SA Report

December 2024



Quality information

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1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake a Sustainability Appraisal (SA) in support of the emerging Epsom and Ewell Local Plan that is being prepared by Epsom and Ewell Borough Council (EEBC).
- 1.1.2 Once adopted, the plan will set the strategy for growth and change for the Borough up to 2040, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for local plans.¹

1.2 SA explained

- 1.2.1 It is a requirement that a SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations').
- 1.2.2 In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that presents an appraisal of "the plan and reasonable alternatives". The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions**:
 - What has Plan-making / SA involved **up to this point**?
 - including appraisal of 'reasonable alternatives'
 - What are the SA findings **at this stage**?
 - i.e. in relation to the draft plan
 - What are the **next steps**?

1.3 This SA Report

- 1.3.1 Following a draft plan consultation in 2023, the Council has now prepared the final draft ('proposed submission') version of the plan for 'publication' under Regulation 19 of the Local Planning Regulations.
- 1.3.2 As such, this is the formal SA report. It presents an appraisal of "the plan and reasonable alternatives", along with other prescribed information, aimed at informing representations and plan finalisation.²

Structure of this report

- 1.3.3 This report is structured in **three parts** in order to answer the questions above in turn.
- 1.3.4 Before answering the first question there is a need for two further introductory sections:
 - Section 2 – introduces the plan scope.
 - Section 3 – introduces the SA scope.
- 1.3.5 It should be noted that this report is structured identically to the Interim SA Report from 2023.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

² See **Appendix I** for a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2 The plan scope

2.1 Introduction

- 2.1.1 The aim here is to briefly introduce the context to plan preparation, including the national context of planning reform; the plan area (ahead of more detailed discussion of key issues elsewhere in the report); the plan period; and the objectives that are in place to guide plan preparation (the 'plan scope').

2.2 Context to plan preparation

- 2.2.1 EEBC began preparing a new Local Plan in **2017**, when a consultation was held on 'Issues and Options'. A Draft Local Plan was then published for consultation in **2023** and generated comments from 1,736 individuals or organisations (in the context of a Borough population of ~80,000).
- 2.2.2 The plan is being prepared under the **December 2023 NPPF**. Whilst a new NPPF was published on 12th December 2024, and the Government's direction of travel in respect of planning reform is acknowledged, the plan will be submitted by 12th March 2024 such that the previous NPPF applies.
- 2.2.3 Central to both the 2023 and 2024 versions of the NPPF is a requirement for local authorities to take a positive approach to development, with an up-to-date local plan that provides for development needs, including Local Housing Need (**LHN**), as far as is consistent with sustainable development.
- 2.2.4 The Borough's LHN is understood on the basis of the Government's standard method prior to 12th December 2024, which generates a figure of 569 dwellings per annum (dpa). However, there is also the context of the Government's new standard method published on 12th December 2024, which sees the Borough's LHN rise by 56%. Furthermore, it is important to note that the new standard method sees an increase in LHN for most neighbouring areas; for example, Elmbridge District's LHN rises by 139%, Reigate and Banstead District's by 103%; LB Sutton's by 87% and Mole Valley District's by 81%.
- 2.2.5 Under the new NPPF there remains flexibility to evidence a **housing requirement** set below LHN through local plan-making (such that unmet need is generated), but there is a new emphasis on seeking to provide for housing need in full, and also on collaborating with neighbouring authorities in respect of unmet need. There is also new [guidance](#) in respect of addressing issues in full prior to submission, as opposed to relying on the Examination in Public process (overseen by a Planning Inspector) to 'fix' unsound plans.
- 2.2.6 It is also important to recognise that the output of the new standard method now applies for the purposes of calculating a five year **housing land supply**, because the adopted Local Plan is more than five years old. The Borough was unable to demonstrate a five year housing land supply against the previous standard method LHN (see Appendix A of the [AMR](#)), and the situation is now more challenging (plus there are other detailed changes in the new NPPF to account for). In turn, there are implications for the extent to which key policies in the local development plan are deemed 'out-of-date' such that the presumption in favour of sustainable development applies (or 'tilted balance' in favour of development; NPPF para 11).
- 2.2.7 The way to address this situation (short of simply granting permission to ad hoc / speculative planning applications) is to adopt a new Local Plan post haste. The urgency was recognised by the Surrey Campaign to Protect Rural England (CPRE) in their response to the consultation in 2023:
- "[A delayed Local Plan] has exposed Epsom and Ewell to speculative planning applications on Green Belt sites such as South Hatch and Langley Bottom Farm, as well as resulting in a number of inappropriate proposals being advanced within the urban areas of the Borough."*³
- 2.2.8 To summarise the discussion so far, there is 'top down' pressure to adopt a local plan that identifies a supply of land sufficient to provide for development needs (as fully as possible), and there is also 'bottom up' pressure in the sense of a need to avoid the presumption in favour of sustainable development.
- 2.2.9 Finally, there is a need to adopt a local plan that delivers on priority objectives regardless of pressure from central government or concerns about avoiding a future under the presumption. For example:

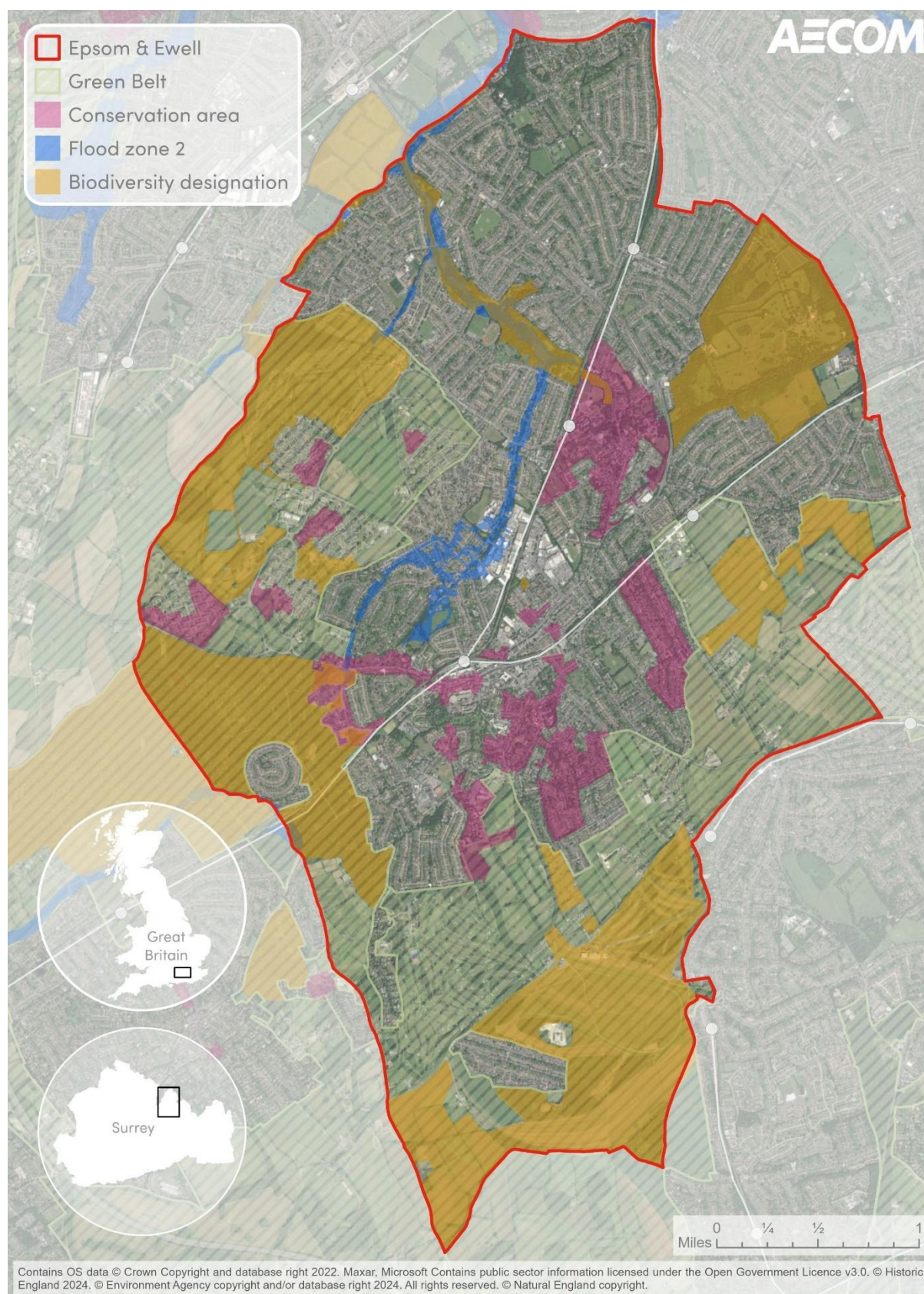
³ For example, in the case of Langley Bottom Farm, the Inspector [explains](#): "For the above reasons, and also in the context of the LPAs housing land supply and delivery position, I do not find that the site would be unsustainably located."

- Providing for housing need is not only of great importance in-and-of itself, but also due to wide-ranging secondary benefits, for example in terms of delivering affordable housing and supporting the economy.
- Plan-led housing growth creates an opportunity to strategically target infrastructure investment such that the benefits of growth are realised in a way that far exceeds what can otherwise be achieved.
- A local plan is an opportunity to consider development viability in a strategic way, such that a considered approach can be taken to policy 'asks' including housing mix, affordable housing, net zero development, biodiversity net gain and space / accessibility standards.
- Local plans enable a strategic approach to wider land uses including employment land.

2.3 The plan area

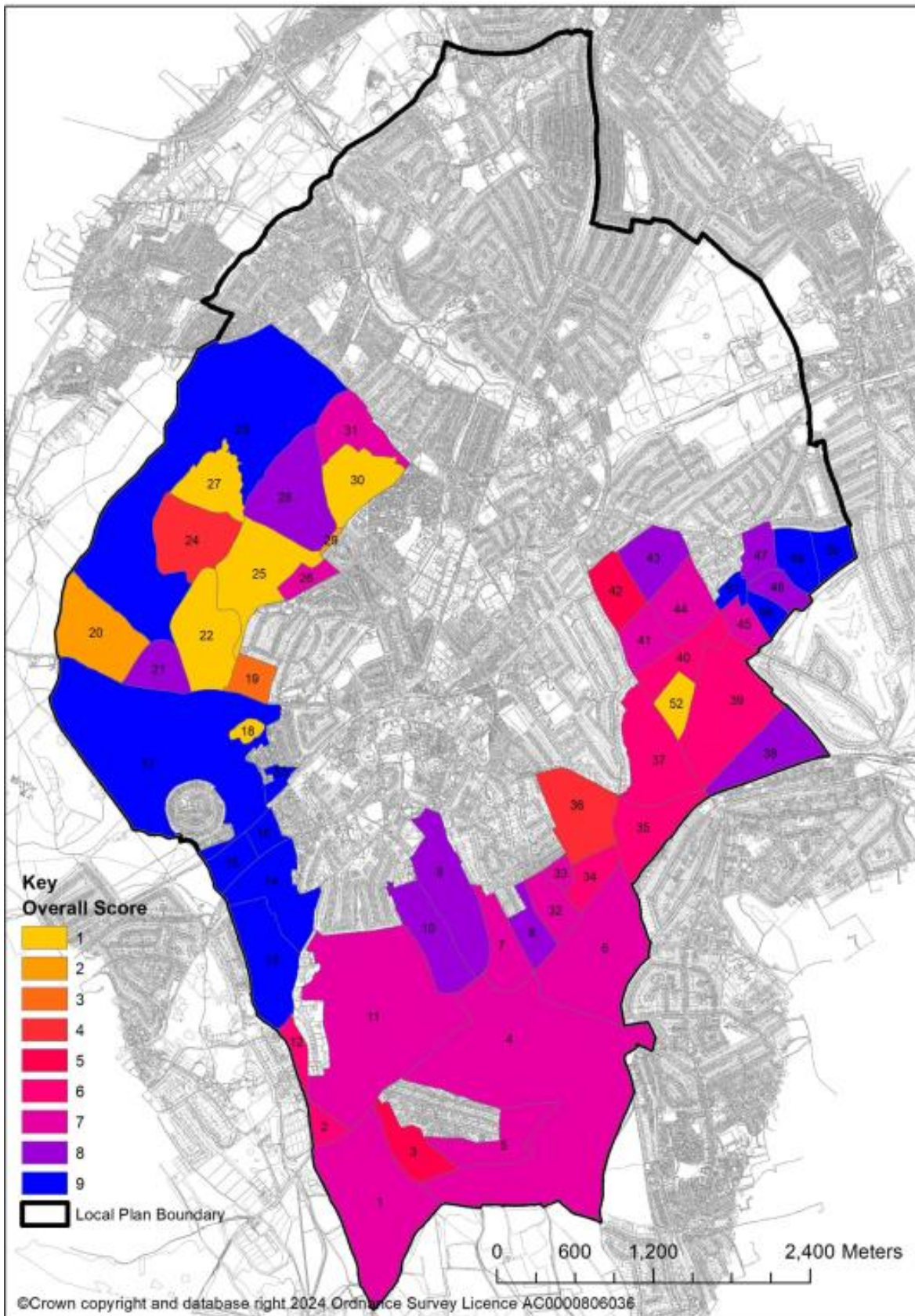
- 2.3.1 Epsom and Ewell is a small borough at the eastern extent of Surrey. Although Surrey's smallest local authority, in terms of both population and area, Epsom and Ewell is the most densely populated and grew significantly by 7.7% (to 80,900 residents) between 2011 and 2021. A significant proportion of recent growth has been via redevelopment of a series of former hospitals; something of a one-off opportunity.
- 2.3.2 The Borough has one of the highest rates of economically active people of working age in the country (84.2% in June 2022). However, there is a skills shortage in some sectors, such as hospitality, with many workers unable to afford homes close to work. Epsom is one of the least affordable places to live in Surrey when comparing local wages to property prices, and there are some notable pockets of relative deprivation, including Court Ward, to the north of the Town Centre, which is one of Surrey's most deprived.
- 2.3.3 Epsom town centre is the Borough's primary centre and is notably home to the University of Creative Arts and Laine Theatre Arts, with secondary centres at Ewell Village and Stoneleigh Broadway. There are also retail parades, and several community facilities elsewhere. There is a large industrial area close to the town centre and significant horseracing industry-related employment in the south of the Borough.
- 2.3.4 The Borough is well served by rail, bus and active travel infrastructure, including high quality cycle routes. In terms of the road network, Epsom and Ewell is situated just within the M25 corridor, and the A24 is the primary radial road corridor, with the Borough also intersecting the A240, A232 and A2022. Epsom and Ewell has the lowest number of cars per household of the Surrey authorities, at 1.4 cars per household.
- 2.3.5 There is a clear need for growth to provide for development needs, and there are also wider development related opportunities, e.g. relating to relatively good transport connectivity and strong development viability (key low carbon / net zero considerations). However, there are also major constraints to growth.
- 2.3.6 A foremost issue relates to the Borough's location at the inner edge of the London Metropolitan Green Belt, which broadly forms a horseshoe shape wrapping around the urban area in the centre and north of the Borough – see Figures 2.1 and 2.2. Significant parts of the Green Belt to the west of the urban area comprise the former hospitals cluster, which might now be taken out of the Green Belt should it be determined that the land no longer contributes to openness. As for the undeveloped Green Belt, the great majority contributes very strongly to Green Belt purposes; for example, there is a clear case for maintaining the narrow Green Belt gap between Epsom and the Nork / Banstead urban area to the south east.
- 2.3.7 It is also the case that there are extensive non-Green Belt constraints to growth, for example relating to: character / built form, the historic environment and flood risk in the urban area; and landscape and biodiversity sensitivities within the Green Belt, also accessibility/connectivity. Key considerations include:
- The southern part of the Borough comprises Epsom Downs, which forms part of the North Downs dip slope (the Surrey Hills National Landscape boundary is approximately 1.8 km south of the Borough).
 - Focusing on biodiversity, Epsom Common forms part of a large nationally important Site of Scientific Interest (SSSI), and Banstead Downs SSSI is located outside but in close proximity to the Borough. Also, large swathes of the Borough are locally designated as a Site of Nature Conservation Importance (SNCI) including Horton Country Park, Nonsuch Park, the Hogsmill river corridor in the north of the Borough and nearly the entirety of Epsom Downs in the south of the Borough.
 - Focusing on the historic environment, Epsom and Ewell contains over 300 listed buildings, 21 conservation areas (three of which are classed as 'at risk' according to the national Heritage at Risk Register) and a Registered Park and Garden (Nonsuch Park). EEBC has also designated over 50 locally listed buildings, Epsom Downs is a historic home to horseracing, and Epsom Salts originated locally.

Figure 2.1: The plan area showing select key constraints⁴



⁴ The figure does not aim to present a comprehensive picture, but rather to provide an initial impression of key constraints. The areas shown as subject to biodiversity constraint are: nationally designated as a Site of Special Scientific Interest (SSSI), which within the Borough means Epsom Common; locally designated as a Site of Nature Conservation Importance (SNCI); or locally designated as a Local Nature Reserve (not strictly a biodiversity designation, but this is an opportunity to show the full extent of Horton Country Park, which is a key constraint to growth at the northwest extent of the Borough).

Figure 2.2: Overall contribution to Green Belt purposes (total of three individual scores)⁵



⁵ This figure shows a summary of the Stage 1 Green Belt Review (2017), which examined the sensitivity of 52 land parcels within the Green Belt in terms of the defined purposes of the Green Belt. Specifically, the Study scored parcels in terms of four of the five defined purposes, although the decision was subsequently taken through further work in 2024 focus on three: A) check the unrestricted sprawl of large built-up areas; B) prevent neighbouring towns merging into one another; and C) assist in safeguarding the countryside from encroachment. It is important to consider performance against all three purposes in turn, but equally it is appropriate to summarise the performance of parcels by presenting a total of the three scores, as per the figure above.

2.4 The plan period

- 2.4.1 The plan period is 18 years from 2022 to 2040. See further discussion in Sections 5.2 and 5.5.
- 2.4.2 Since the start of the plan period 456 of homes have already been completed, and it is also the case that 667 homes have planning permission, such that they are anticipated to deliver in the early part of the plan period. Furthermore, there is a need to account for ongoing windfall development over the plan period, with the current assumption being 862 homes. As such, a key aim of the Local Plan is to identify land to deliver homes over-and-above supply from completions, permissions ('commitments') and windfall.
- 2.4.3 Total supply from completions, commitments and windfall is 1,918 homes, whilst Local Housing Need (LHN) – as understood from the standard method (see discussion above) – is 10,242 homes (18 x 569 dpa). Identifying land through the Local Plan to deliver the residual figure is highly challenging in the Epsom and Ewell context and in 2023, at the time of the Draft Plan consultation, the proposal was to provide for around half of LHN over the plan period. However, at the current time the work presented below starts from a position of wishing to leave 'no stone left unturned' in respect of providing for LHN.
- 2.4.4 Having said this, another consideration is that NPPF (2023) para 69 allows for flexibility in respect of demonstrating the ability to provide for LHN year-on-year over the latter years of the plan, recognising the potential to boost supply for these years through one or more local plan reviews (required every five years).

2.5 Plan objectives

- 2.5.1 Nine strategic objectives, to guide plan-making, are included in the new Local Plan, which are:
- Provide a sustainable level of **housing growth** having regard to the borough's constraints, to meet future housing needs by identifying and maintaining a supply of land for housing ensuring this is of the right size, right type, provides the right tenure and is in the right location and provides a choice of housing for people at all stages of life.
 - Enhance the vitality and viability of **Epsom Town Centre** and the Local centres by supporting their diversification, and enhancement of the cultural offer and public realm.
 - Provide a sustainable level of **economic growth** to ensure that local people of all ages can find employment and remain in the borough by: ensuring that existing and new businesses can thrive whilst supporting growth sectors and the continued success of the borough's education establishments and equestrian sector; and supporting the creative industries, including start-ups through the provision of appropriate business accommodation.
 - Ensure that development is supported by the necessary physical, social and green **infrastructure** to meet people's current and future needs.
 - Maximise opportunities for those living, visiting, working and studying in the borough to access the diverse **green infrastructure** network.
 - Ensure that development does not have a detrimental impact on the borough's **environmental assets** including designated national sites, landscape character, water quality and biodiversity and that new development provides opportunities to provide for biodiversity net gains.
 - Support measures that prioritise active and sustainable **travel modes** including improved facilities for pedestrians and cyclists and improvements to public transport.
 - Deliver high quality and sustainable **buildings and places** that integrate into their surroundings and respond to local heritage.
 - Support action on **climate change** and reduction of the borough's carbon emissions, aiding the transition to net zero through a combination of mitigation and adaptation measures.
- 2.5.2 These plan objectives are key inputs to the SA process, including because to the requirement is to define, appraise and consult on reasonable alternatives taking account of *"the objectives... of the plan."*

3 The SA scope

3.1 Introduction

- 3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1).
- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA. Further information is presented in a stand-alone [Scoping Report](#) (2022); however, it is important for the SA scope to remain flexible, responding to the nature of the emerging plan and reasonable alternatives, and the latest evidence-base.

3.2 Consultation on the scope

- 3.2.1 The regulatory requirement is that: *“When deciding on the scope and level of detail of the information that must be included in the [SA Report], the responsible authority shall consult the consultation bodies.”* As such, the consultation bodies – the Environment Agency, Historic England and Natural England – were consulted on the SA scope in 2022. Subsequently the report was updated/finalised to reflect responses received from Spelthorne Borough Council and the Environment Agency, and then comments on the SA scope were encouraged at the time of the Draft Plan consultation in 2023, but no comments were received.

3.3 The SA framework

- 3.3.1 The outcome of scoping work in 2022 was an SA ‘framework’ comprising 12 topics, each with one or more associated objectives. The aim of the SA framework is to ensure suitably focused and concise appraisal.
- 3.3.2 Subsequently, ahead of the consultation in 2023, it was determined appropriate to add a new topic dealing with ‘Accessibility’ (to community infrastructure), and no further adjustments are made at the current time.

Table 3.1: The SA framework

Topic	Objective
Accessibility	Ensure good accessibility to community infrastructure, including by avoiding issues (e.g. pressure on existing infrastructure capacity) and realising growth-related opportunities.
Air quality	Improve air quality; also wider environmental quality considerations, e.g. noise.
Biodiversity	Support the integrity of internationally, nationally, and locally designated sites; Protect and enhance habitats and species in Epsom and Ewell; Enhance understanding of biodiversity.
Climate change adaptation	Support resilience to the potential effects of climate change, particularly flooding.
Climate change mitigation	Reduce contribution to climate change, notably emissions from transport and the built environment, mindful of national and local decarbonisation / net zero ambitions.
Communities and health	Improve the health and wellbeing of residents; address wide-ranging other communities-related issues and opportunities, for example relating to amenity and safety.
Economy and employment	Support sustainable economic development, mindful of local and larger-than-local (e.g. sub-regional) issues and opportunities.
Historic environment	Conserve and enhance the historic environment, including designated and non-designated heritage assets and archaeology; Promote understanding of the historic environment.
Housing	Provide everyone with the opportunity to live in good quality, affordable housing.
Land and soils	Ensure the efficient and effective use of land.
Landscape	Protect and enhance the character and quality of landscapes, townscapes, village-scapes.
Transport	Promote sustainable transport use, encourage accessibility, and reduce the need to travel.
Water	Manage water resources in a sustainable manner.

Part 1: What has plan-making / SA involved up to this stage?

4 Introduction to Part 1

Overview

- 4.1.1 Plan-making has been underway since 2017, as discussed. However, the aim here is not to relay the entire backstory, nor to provide an 'audit trail' of steps taken. Rather, the aim is to report work undertaken to examine **reasonable alternatives** ahead of the current consultation. Specifically, the aim is to:
- explain the reasons for selecting the alternatives dealt with – see **Section 5**
 - present an appraisal of the reasonable alternatives – see **Section 6**
 - explain the Council's reasons for selecting the preferred option – see **Section 7**
- 4.1.2 Presenting this information is in accordance with the requirement for the SA Report to present an appraisal of reasonable alternatives and “*an outline of the reasons for selecting the alternatives dealt with*”.

Reasonable alternatives in relation to what?

- 4.1.3 The legal requirement is to examine reasonable alternatives (RAs) taking account of “*the objectives and geographical scope of the plan*”, which suggests a need to focus on the **spatial strategy**, i.e. providing for a supply of land, including by **allocating sites** (NPPF para 69), to meet objectively assessed needs and wider plan objectives. Establishing a spatial strategy is clearly a central objective of the Local Plan.⁶
- 4.1.4 Spatial strategy alternatives can be described as “**growth scenarios**” and can also be described in summary as alternative key diagrams. This approach was taken in the Interim SA (ISA) Report (2023) and was generally well received, although there was some criticism from those with a site-specific interest.

What about site options?

- 4.1.5 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely the case and is not the case for the Epsom and Ewell Local Plan. Rather, the objective is to allocate a *package* of sites to meet needs and wider objectives, hence RAs must be in the form of alternative *packages* of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing reasonable growth scenarios – see Sections 5.3 and 5.4.
- 4.1.6 At the current time the aim is to give more detailed consideration to site options relative to the approach taken in 2023 (see Sections 5.2 and 5.3 of that report), but it remains the case that this is as a means to an end, namely the end goal of arriving at reasonable alternatives in the form of growth scenarios.

Is the focus on housing sites?

- 4.1.7 Establishing a supply of land to meet housing needs (alongside infrastructure delivery, place-making etc) is typically a matter of overriding importance for local plans, and the current Local Plan is no exception. However, local plans are also tasked with meeting wider development needs, including in respect of employment land and specialist accommodation. The process set out in Section 5 is somewhat *housing-led*, but other needs are discussed as appropriate, including within the concluding section (Section 5.5).

What about other aspects of the plan?

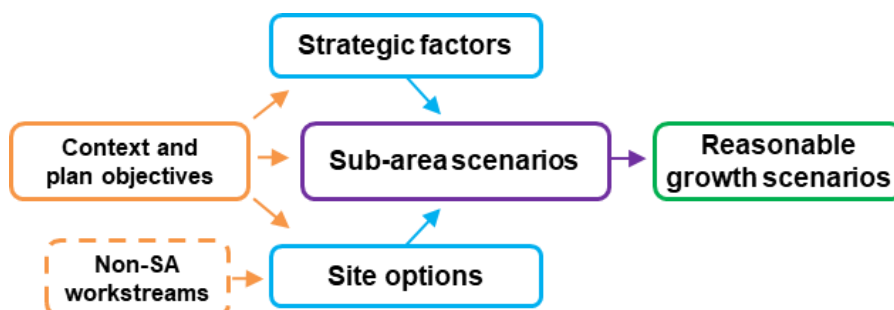
- 4.1.8 As well as establishing a spatial strategy, allocating sites etc, the Local Plan must also establish policy on thematic district-wide issues, as well as site-specific policies. Broadly speaking, these can be described as development management (DM) policies. However, it is a challenge to define “reasonable” DM policy alternatives, and, in this case, none are identified (N.B. this was also the case within the 2023 ISA Report).⁶

⁶ Another consideration is a need to focus only on alternatives that are meaningfully different to the extent that they will vary in terms of 'significant effects', where significance is defined in the context of the plan.

5 Defining growth scenarios

- 5.1.1 The aim here is to discuss the process that led to the definition of reasonable growth scenarios in 2024. To reiterate, growth scenarios equate to **reasonable alternatives**.

Figure 5.1: A standard broad process to define reasonable growth scenarios

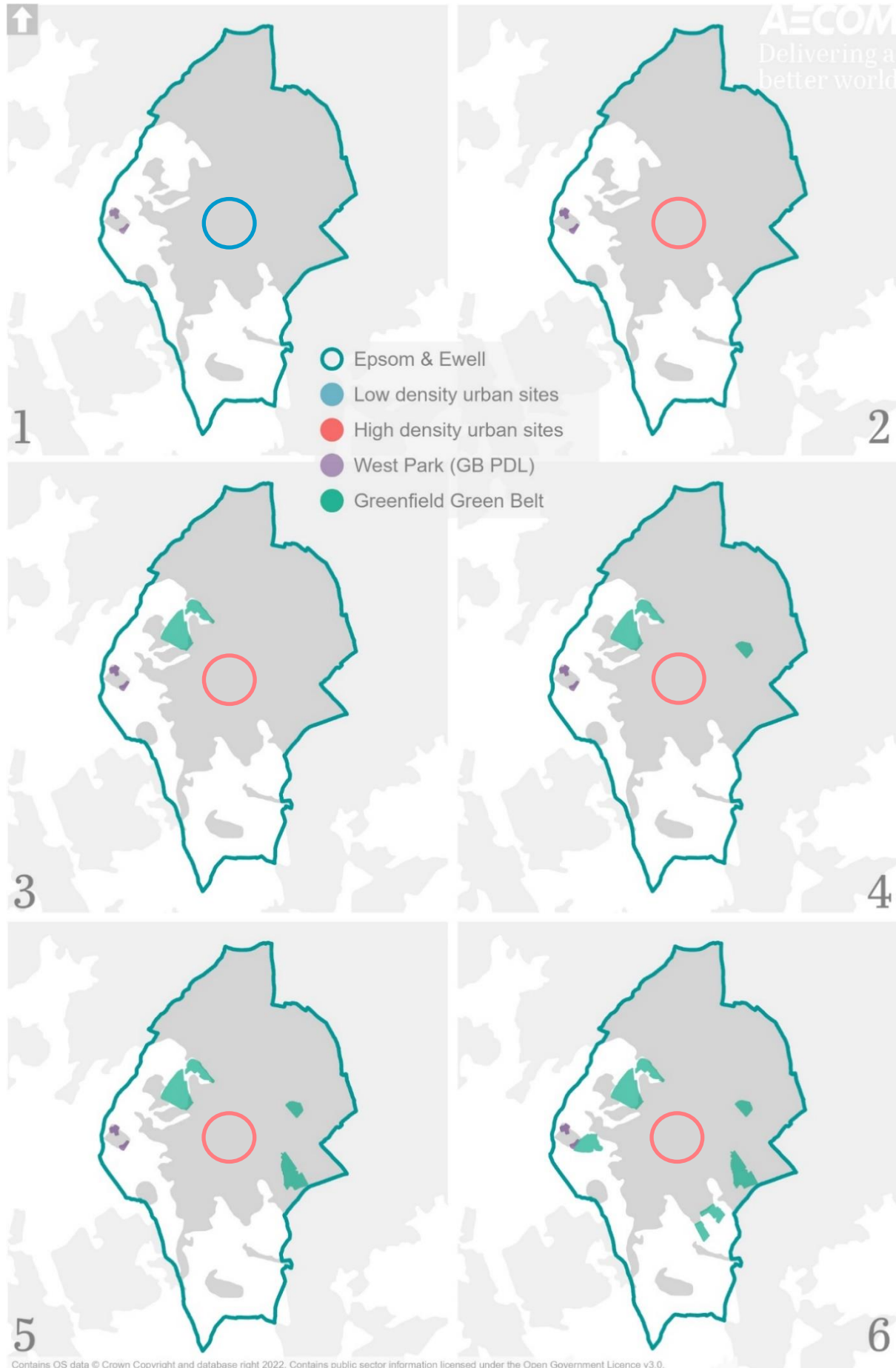


- 5.1.2 This process is described across the following sub-sections:
- **Section 5.2** – explores **strategic factors** with a bearing on growth scenarios.
 - **Section 5.3** – considers individual **site options**, as the ‘building blocks’ of growth scenarios.
 - **Section 5.4** – draws upon the preceding two sections to consider options/scenarios for **sub-areas**.
 - **Section 5.5** – combines sub-area scenarios to form **reasonable growth scenarios**.
- 5.1.3 With regards to the **context**, the first point to make is that key context is provided by work completed in 2023 to define, appraise and consult upon a set of six reasonable growth scenarios – see Figure 5.2. In some respects, the work reported below is an update to that presented in Section 5 of the Interim SA Report. However, the aim is to present analysis that is up-to-date, i.e. ‘policy relevant’ at the current time.
- 5.1.4 A second point to make, regarding context to the process of defining growth scenarios, is that consultation responses received in 2023 are a key input, and a key aim is to quote consultation responses.
- 5.1.5 Thirdly, there is a need to acknowledge that numerous ‘non-SA’ workstreams must feed-in, but there are invariably challenges in terms of timings. Key workstreams underway in the latter half of 2024 to account for as part of work to define RA growth scenarios, as far as practically possible, include the following:
- Workstreams examining Green Belt sites – exploring Green Belt site options with a view to potential allocation is a key task for the local plan / SA process. See further discussion in Section 5.3.
 - Scheme specifics – generating an understanding what specific site options would or could deliver (e.g. in terms of land uses and infrastructure) involves a detailed process, and attention naturally focuses on emerging proposed allocations more so than emerging omission sites. However, it is both emerging proposed allocations and emerging omission sites that must be a focus of the process set out below.
 - Infrastructure Delivery Plan (IDP) – infrastructure planning is a major undertaking for any local plan, and the reality is that the complexity of the work means that there is a pragmatic need to focus attention on the emerging preferred approach, with limited if any potential to explore alternative growth scenarios. Also, the reality is that it is work that must be completed late in the day, once the preferred approach is near-finalised and taking into account a range of other workstreams.

A note on limitations

- 5.1.6 It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process* that led to the definition of reasonable alternatives for appraisal. This amounts to a relatively early step in the plan-making process which, in turn, has a bearing on the extent of evidence-gathering and analysis that is proportionate, also recalling the legal requirement, which is to present an “**outline of the reasons for selecting alternatives...**” [emphasis added].

Figure 5.2: Work to explore growth scenarios in 2023 is a key input to the process of defining scenarios in 2024



5.2 Strategic factors

Introduction

5.2.1 The aim of this section of the report is to explore strategic factors (issues and options) with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:

- Quantum – how many new homes are needed (regardless of capacity to provide them)?
- Broad spatial strategy – broadly where is more/less suited to growth, and what typologies are supported?

Quantum

5.2.2 This section sets out the established Local Housing Need (LHN) figure for the Borough, before exploring *high level* arguments for the Local Plan providing for a quantum of growth either above or below LHN.

N.B. it is important to emphasise that this section does not aim to conclude on the question of how many homes should be provided for across the reasonable growth scenarios. Rather, the aim is to present an initial high level discussion, to essentially frame subsequent discussion of broad strategy options, site options and sub area scenarios. It is only *then* that a conclusion can be drawn (see Section 5.5).

Background

5.2.3 A central tenet of local plan-making is the need to **A)** objectively establish housing needs ('policy-off'); and then **B)** develop a policy response to those needs. The Planning Practice Guidance (PPG) explains: *"Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from... establishing a housing requirement figure..."*

5.2.4 With regards to (A), the NPPF (paragraph 61) states that **LHN** should be established via an assessment "conducted using the **standard method**" unless there are *"exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach..."*

5.2.5 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting a **housing requirement** that equates to LHN, and a **housing supply** through policies sufficient to deliver this housing requirement (over time, i.e. year-on-year, which will typically necessitate putting in place a 'buffer' to mitigate against the risk of unforeseen delivery issues). However, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.

Epsom and Ewell's Local Housing Need (LHN)

5.2.6 A three-step standard method for calculating LHN was first published by the Government in 2017, and then a fourth step was added in 2020 (see the Planning Practice Guidance, PPG), but this does not apply to the Borough. There have also been some notable changes to guidance since the method was first introduced, most notably an update in 2018/19 requiring that the household growth projections used as an input to the method must be the 2014-based projections, rather than more recent projections.

5.2.7 The standard method derived LHN for the Borough is **569 dwellings per annum** (dpa), as discussed in Section 2, which amounts to **10,242 homes** over the plan period. This is a 'capped' figure, meaning that step 3 of the standard method ("Capping the level of any increase") does apply. The uncapped housing need figure is higher, as discussed within the HEDNA (2022), and as discussed further below.

5.2.8 Under the 2023 NPPF there is flexibility to calculate LHN using an alternative methodology in 'exceptional circumstances' (N.B. the Government recently consulted on removing this flexibility). However, in 2023 there was not considered to be exceptional circumstances to justify use of an alternative method, and that remains the case at the current time. CPRE Surrey stated through the consultation in 2023 that: *"Recent ONS projections arrive at far lower rates of population and household growth for Epsom and Ewell. Nowhere does the [plan] state that the Government is actively considering changing the way that housing targets are determined."* However, the ONS subsequently released 2021-based 'interim' population projections subsequently showed a rate of population growth higher than previous projections (nationally; discussed [here](#)), plus there is now the context of the Government having consulted on a new standard method figure for Epsom and Ewell that is 43% higher than the current figure, as discussed in Section 2.

Is it reasonable to explore setting the housing requirement at a figure below LHN?

5.2.9 In short, the answer is 'yes', on the basis of NPPF paragraph 11, which states:

*"... strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."* [emphasis added]

5.2.10 Epsom and Ewell is heavily constrained in the terms set out in NPPF paragraph 11, as has already been introduced above. In particular, the London Metropolitan Green Belt constrains virtually all undeveloped land in the Borough; there is very limited land within the Green Belt that is brownfield / previously developed or otherwise that does not contribute strongly to the purposes of the Green Belt; there are a range of significant biodiversity and heritage designations; flood risk is a localised but significant constraint to growth in some key areas; and urban character associated with lower density built form is a constraint.

5.2.11 This understanding led to a decision in 2023 to define, appraise and consult upon growth scenarios that would involve setting the housing requirement significantly below LHN (and so generate unmet need).

5.2.12 Subsequently, there has been much discussion nationally regarding whether it is "mandatory" for local plans to provide for LHN in full (i.e. set the housing requirement at LHN), and about whether local authorities are "required" or "expected" to release Green Belt in order to provide for housing needs (in full or otherwise).⁷ For example, CPRE Surrey stated through the consultation in 2023:

"CPRE Surrey therefore urges Epsom and Ewell Council to delay the progression of this Plan until the Government's approach to these central issues has been clarified. In particular, the Government is very likely to confirm that housing targets are 'advisory' rather than 'mandatory'. The Government is also likely to say that local authorities do not need to change their Green Belt boundaries to meet housing targets."

5.2.13 However, the current situation in terms of national policy context is ultimately considered to be broadly unchanged from that in 2023. Whilst new wording in the NPPF (2023) sets out that *"the outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area"*, it is not entirely clear whether this is suggesting that: A) the standard method is advisory for the purposes of calculating LHN; and/or B) LHN is advisory for the purposes of establishing a housing requirement. Furthermore, it is difficult to conclude that either (A) or (B) does more than clarify the pre-existing position.

5.2.14 Focusing on Green Belt, there has always been a 'high bar' to evidencing and ultimately justifying Green Belt release, with a need to draw upon technical work, options/alternatives appraisal and consultation.

5.2.15 On the basis of the points discussed above, there remains a clear *high level* argument for exploring growth scenarios that would involve setting the housing requirement at a figure below LHN and, in turn, generating unmet housing need that must then be met by one or more neighbouring or nearby local authorities.

5.2.16 However, on the other hand, there is a strong argument for ruling out *very low* growth. This reflects:

- The extent of housing need(s) locally, including in respect of affordable housing (discussed below).
- Understanding that meeting housing need is important not only in and of itself, but also due to highly significant secondary benefits, as has been discussed above.
- The fact that Epsom and Ewell sits within a constrained sub-region where unmet housing need is already a major issue, with the reality being that there is little or no confidence regarding where, when or even if any unmet housing need generated would be provided for.

⁷ A letter from the Secretary of State to all local authorities in England dated 5th Dec 2022 explained: *"Green Belt: further clarifying our approach to date... we will be clear that local planning authorities are not expected to review the Green Belt to deliver housing..."* This intent was then reflected in new wording within the draft NPPF in Dec 2022 (*"LPAs are not required to review and alter green belt boundaries if this is the only way of meeting their assessed local housing need in full."*) However, this new wording was then not taken forward within the final NPPF (Dec 2023; see explanation [here](#)). The latest situation at the time of writing (Dec 2024) is that the new NPPF (2024) includes new wording including: *"... Exceptional circumstances [for Green Belt release through local plan] include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt..."*

- The Government's planning reform agenda including as reflected in the new NPPF (December 2024).

Is it reasonable to explore setting the housing requirement at a figure above LHN?

- 5.2.17 The reality is that it is extremely difficult to envisage any reasonable scenario involving a housing requirement set above LHN in the Epsom and Ewell context, even before having considered broad spatial strategy (see the second part of this current section) or supply options in any detail (Sections 5.2 and 5.3).
- 5.2.18 In 2023 the conclusion reached was that the highest reasonable growth scenario would involve a housing requirement set at ~70% of LHN, and the situation has not fundamentally changed since that time. Whilst many consultation responses were received from the development industry calling for higher growth, the focus was more on the option of setting the housing requirement *at LHN* rather than *above LHN*. With regards to other organisations that responded to the consultation in 2023, there were few calls for higher growth, let alone higher growth to the extent that the housing requirement is set above LHN.
- 5.2.19 However, it is nonetheless appropriate to present a high level discussion here of key reasons for boosting the housing requirement as far as possible, relative to that proposed in 2023.

Local housing need

- 5.2.20 Firstly, there is a need to recall that the standard method-derived LHN figure introduced above is 'capped', meaning that a cap is applied as step 3 of the method (subsequent to step two, which is "an adjustment to take account of affordability"). The uncapped figure is 736 dpa and the PPG states: "*Where [standard method LHN] is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered.*" However, the cap is applied in order to ensure a degree of realism in respect of delivery rates and, given average delivery of 191 dpa over the period 21/22 – 23/24 (see Authority Monitoring Reports), there is reason to suggest that applying the cap is appropriate for the Borough.
- 5.2.21 Secondly, there is a need to be clear that the Borough's affordability ratio (the ratio of median house price to workplace-based earnings) is very high the context of Surrey and the South East. The current ratio is 16.8 and for context was previously stable at around 10 over the period 2002 to 2012.
- 5.2.22 Thirdly, and to reiterate in Section 2, there is the context of the Government recently having published a new standard method that sees much higher figures for the Borough and most neighbouring areas.

Affordable housing need

- 5.2.23 The HEDNA (2023) identifies a need for 652 affordable homes per annum, which is in stark contrast to recent delivery over the past three monitoring years of 32 homes per annum (and an even lower average of 30 homes per annum looking back over the past six years).
- 5.2.24 The PPG is clear that a boost to the housing requirement "*may need to be considered where it could help deliver the required number of affordable homes*". However, the question of 'uplifting' to reflect affordable housing needs is very complex, as discussed within the HEDNA (2023), and as succinctly explained recently by the [West Berks](#) Local Plan Inspector: "*... policy SP19 is expected to deliver a total of 2,190 affordable homes on market-led schemes... There would be a nominal deficit of around 3,420 against the identified need for... affordable homes although **the link between affordable and overall need is complex** as many of those identified as being in need of an affordable home are already in housing.*"

Wider arguments

- 5.2.25 NPPF para 67 explains: "*The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.*"
- 5.2.26 With regards to unmet need for neighbouring areas, the simple fact is that this is very extensive, with all of the other East Surrey LPAs (Spelthorne, Elmbridge, Mole Valley, Reigate & Banstead and Tandridge) generating or at clear risk of generating significant unmet need (see further discussion overleaf).
- 5.2.27 With regards to growth ambitions, these are not a reason for considering a housing requirement set above LHN. Crossrail 2 is supported in the current London Plan, and could be transformative, but it is not funded. The previously proposed route map is [here](#), showing three stations in the Borough.

Concluding discussion on housing quanta options (high level)

- 5.2.28 The situation has evolved since 2023, in that there is now increased ‘top down’ pressure to close the gap between the housing requirement and LHN (and so avoid generating unmet need) as far as possible.
- 5.2.29 This is primarily a reflection of the Government’s direction of travel in respect of seeking to ensure national coverage of local plans that collectively provide for housing needs, and the recent Elmbridge Local Plan Inspector’s [Interim Findings Letter](#) is a reflection of this. Here the Inspector sets out that the submitted plan is unsound, and that the Council must allocate sites to deliver an additional 6,300 homes in order to provide for LHN in full (i.e. set the housing requirement at LHN) and, furthermore, must do so within six months. The Inspector’s letter was influenced not by the Draft NPPF (2024) but by a Written Ministerial Statement issued on 30th July 2024, which sets out that Examinations in Public must not be drawn out in order to allow time to make major changes to unsound plans, e.g. by identifying additional housing supply.
- 5.2.30 The Elmbridge Letter is also referenced in a recent [report](#) to Spelthorne Full Council, where Officers recommend that Members reconsider a previous decision to remove Green Belt allocations from the plan. In particular, Officers propose to retain Green Belt allocations within the plan such that the Local Plan is able to provide for LHN in full over the first five years of the plan period. Members then agreed to the Officers’ proposals at a Full Council meeting on 24th October 2024.
- 5.2.31 Also, a recent [report](#) by officers at Three Rivers District Council setting out options for progressing the Local Plan provides timely evidence (see paras 2.11 to 2.20), with the context being that in July 2024 Members agreed to publish a Local Plan (under Regulation 19) with a housing requirement set at a figure less than half of LHN. Officers explain the following in respect of the Government’s direction of travel:
- “This approach to housing need is underpinning the government’s approach to the economy and as such this is extremely unlikely to change. We may see some tweaks to wording in the NPPF but officers do not expect changes to mandatory housing targets or significant changes to transitional arrangements.”* The conclusion is then as follows (emphasis added): *“Officers consider that Green Belt constraint led approach plans for **levels of growth that undershoot the standard method target by far too much**, and this would be found unsound at examination even if it were examined against the extant 2023... NPPF.”*
- 5.2.32 Officers then go on to explain that the plan would, in all likelihood, not be examined under the 2023 NPPF, such that their soundness concerns are even more stark.
- N.B. the Draft NPPF was indeed mostly taken forward into the final version published on 12th December. However, we caution against use of the term ‘mandatory targets’. Our reading of the new NPPF (alongside associated announcements and statements), is that there does remain potential for Epsom and Ewell to evidence a housing requirement set below LHN, although the evidential bar for doing so is now raised.
- 5.2.33 Swale Borough in Kent also recently published a [report](#) exploring the high level possibility of generating unmet need, and there is also the very recent context of the [Mole Valley Local Plan Inspector’s Report](#).⁸ Here the plan was found to be sound with a housing requirement set at 82% LHN on the basis that:
- *“In arriving at its housing requirement, the Council sought to balance the LHN against... constraints.”*
 - *“It is based on a thorough and robust assessment [of supply options].”*
 - *“[The] housing requirement would be ambitious, almost doubling the target in the existing Plan.”*
- 5.2.34 On this basis, high level conclusions on reasonable growth quanta options are as follows:
- The lowest growth scenario appraised / consulted-on in 2023, which involved a total supply of below 200 dpa, is now considered to be of highly questionable reasonableness. This is primarily on the basis of the Government’s planning reform agenda, as opposed to on the basis of appraisal work completed in 2023 (which did not clearly show this scenario to perform poorly) or consultation responses received (no strategic consultees made any reference to these scenarios).⁹ However, another factor is increased certainty regarding the lack of any solution to unmet need generated by the Local Plan and, in this regard, Reigate and Banstead Borough stated through the consultation in 2023:

⁸ The Epsom Civic Society also summarised the housing requirement options as: 1) “10k to 11k – too much”; 2) “5k to 6k – better but could be less”; 3) “4k – compromise reflecting balance point between 2k and 6k”; and 4) “2k – should be starting point...”

⁹ London Borough of Kingston did state: *“Whilst we accept that there is an ongoing debate over housing need methodologies, we believe that such a high quota of unmet need will place additional pressure on adjoining borough’s housing supply.”*

“... we observe that Policy S1 Spatial Strategy seeks to deliver 5,869 new homes minimum between 2022-2040 which equates to c.326 units per annum average. This would suggest a significant shortfall from the standard methodology number of 576 new homes per annum the equivalent of 57% of the standard method. Whilst we appreciate how this has been achieved, it is unclear how the full housing need is going to be met locally given the neighbouring authorities constraints.”

- There is now a strategic case to suggest that the preferred approach from 2023, which would see the housing requirement set at ~50% LHN, should now be seen as a reasonable low growth approach, with higher growth scenarios also explored that would close the gap to LHN.
- There is also a *strategic* case for testing at least one growth scenario where the housing requirement is set at LHN. However, it remains the case that it is very difficult to envisage any reasonable way of doing so. This is despite acute affordable housing needs locally and the fact that unmet housing need is already a major issue within Surrey and the wider sub-region, with no apparent solutions (for example, the Mole Valley Inspector’s Report makes no reference to any potential solutions).

5.2.35 The matter of precise quantified figures to reflect across the reasonable alternative growth scenarios is returned to within **Section 5.5**, subsequent to consideration of broad spatial strategy issues/options (the remainder of Section 5.2), site options (Section 5.3) and sub-area scenarios (Section 5.4).

5.2.36 Three further considerations to briefly comment here are as follows:

- Stepped requirement – whilst the ideal is to set the housing requirement at LHN (or a higher figure) across the plan period as a whole, there can be scope to consider a stepped housing requirement. This could mean an upward stepped requirement to allow time for key sites to begin to deliver; or, alternatively, it could mean a downward stepped requirement, with a focus on providing for needs as fully as possible in the early years of the plan period (see paragraph 4.5 of the recent Spelthorne Report).
- Requirement versus supply – it can be necessary or otherwise appropriate to identify a level of supply in excess of the housing requirement (at least in the early years of the plan period), such that there is a ‘supply buffer’ to act as a contingency for delivery issues (i.e. to ensure that the housing requirement is delivered in practice year-on-year, in order to minimise the risk of the Council facing the presumption in favour of sustainable development under NPPF paragraph 11). However, a supply buffer is not always seen as necessary; for example, para. 101 of the Mole Valley Inspector’s Report sets out that the housing requirement for the plan period should align precisely with the identified supply (6,381 homes).
- The plan period – the discussion above primarily focuses on the question of what the housing requirement should be set at on an annualised basis. However, there is also the question of what the housing requirement is for the plan period which, in turn, relates to the question of the plan period itself. In this regard, whilst the preferred approach is a plan period running to 2040, it is acknowledged that the plan period might ideally be extended by a further year, in light of NPPF para 22, which in turn would mean that LHN for the plan period increases by 569 homes. However, there are clear arguments for a plan period running only to 2040 in the specific context of this Local Plan. One consideration is that the nature of the Borough is such that there are few large-scale strategic growth options that would still be delivering homes in 2041, and otherwise few options that would still be delivering homes at this time.

5.2.37 Finally, the two boxes below consider two key aspects of wider development needs.

Box 5.1: A note on employment land need

Employment land needs (office, light industrial, industrial, warehousing), as understood from the Housing and Economic Development Needs Assessment (HEDNA, 2023) can be met through the intensification of existing strategic employment sites, delivery of additional employment floorspace that is compatible with residential use in Epsom Town Centre and utilising vacant office floorspace (although the amount of this has reduced in recent years due to conversion to residential and educational uses).

As such, there is little or no strategic case for allocating new employment land.

Box 5.2: A note on Gypsy and Traveller accommodation needs

The Borough has an established Gypsy and Traveller population and Surrey County Council currently manages two Gypsy and Traveller sites within the Borough, which provide a total of 30 public pitches. The Gypsy and Traveller Accommodation Assessment (GTAA) identifies a need for an additional 18 pitches.

Broad spatial strategy

Introduction

5.2.38 This is the second of two sections examining ‘strategic factors’ with a bearing on defining reasonable growth scenarios. Consideration is given to: 1) the urban area; and then 2) the Green Belt.

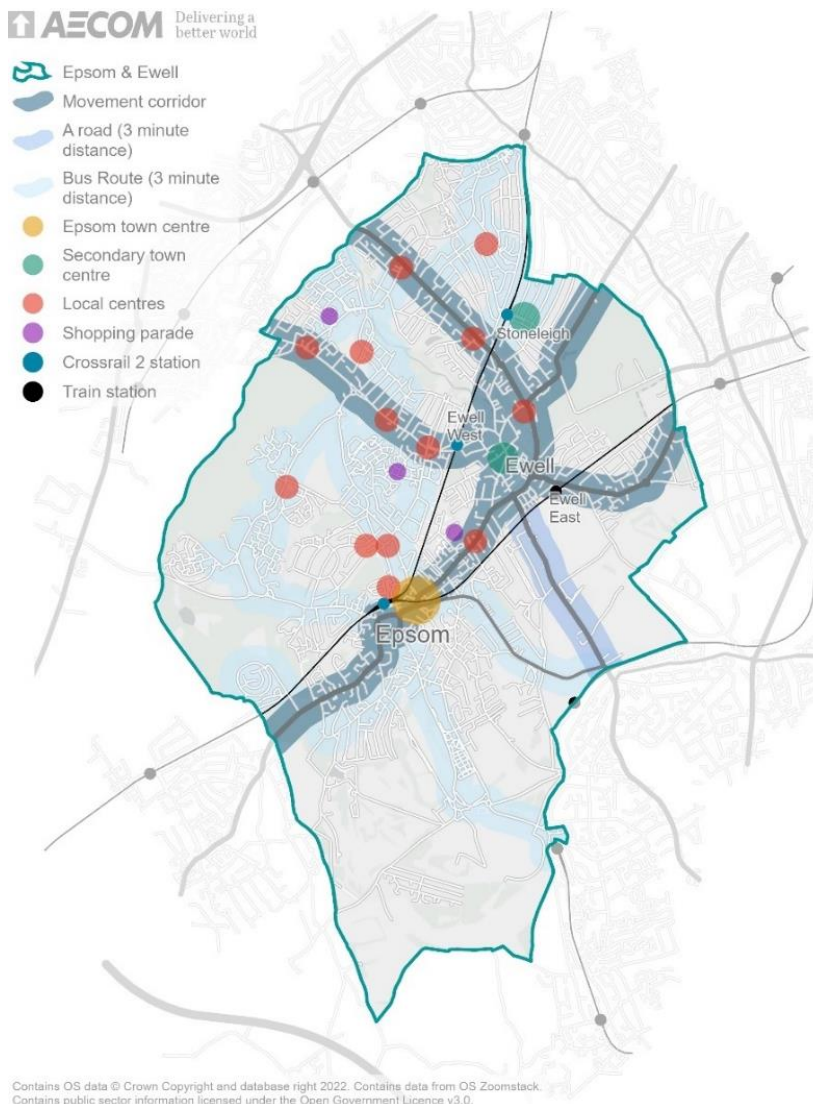
The urban area

5.2.39 There is a clear **main urban area**, comprising the central and northern parts of the Borough, with the Green Belt wrapping around the urban area in the shape of a horseshoe. The urban area is highly variable, with distinct historic settlements (primarily Epsom and Ewell) now joined by later suburban growth, variation in character at a range of scales and clear distinctions in respect of transport connectivity.

5.2.40 Focusing on transport connectivity, there is a key distinction between: more accessible and/or well-connected areas, which means areas that are well-linked to Epsom town centre, one of the two local centres (Ewell and Stoneleigh), a train station and/or one of the primary road corridors, along which there are higher frequency bus services and concentrations of retail parades; and the wider urban area, where accessibility and ‘sustainable transport’ connectivity can be considerably lower.

5.2.41 The figure below was prepared for the purposes of the SA Scoping Report (2022) and does not provide a comprehensive picture (e.g. mindful that bus routes are subject to change; the latest proposal is to define a retail hierarchy comprising ‘local centres’ and ‘neighbourhood parades’; and ‘movement corridors’ are not a formal designation). However, it provides a broad indication of how accessibility and transport connectivity vary across the Borough, including within the main urban area.

Figure 5.3: Centres, transport hubs and key corridors across the Borough



- 5.2.42 There are two further headline points to note regarding the main urban area:
- 5.2.43 Firstly, a **Town Centre Masterplan** was recently approved for publication and gives detailed consideration to development sites that can now be allocated within the Local Plan in order to deliver on the challenging LHN figure introduced above (also delivering new high quality employment space), plus it feeds into understanding regarding an appropriate windfall assumption for the local plan (i.e. an assumption regarding the number of homes that will be delivered across the plan period outside of allocated sites).
- 5.2.44 Whilst the reasonable alternative (RA) growth scenarios that were defined, appraised and published for consultation in 2023 varied in respect of development density assumptions in the town centre, it is now reasonable and appropriate to hold constant the preferred development densities arrived at on the basis of detailed work through the Town Centre Masterplan and other technical workstreams.
- 5.2.45 Whilst there is a theoretical case for higher densities in the town centre on account of this being the part of the Borough associated with highest levels of accessibility and lowest levels of car dependency, there is clearly a need to strike a balance that also accounts for the existing densities and character, heritage designations and wide-ranging other design and place-making objectives. Supporting higher densities in the context of complex redevelopment sites can also potentially assist with development viability, such that sites come forward in a timely manner and are able to deliver on policy asks including around affordable housing and infrastructure, but this is not known to be a particular issue across key sites in Epsom town centre. Also, and on the other hand, support for higher densities through the local plan could result in issues at the planning application stage in that there could be a higher risk of objections, e.g. on the grounds of design considerations and perhaps also car parking.
- 5.2.46 It is ultimately important to take a conservative approach when assigning development densities to urban allocations, as lower densities delivered in practice can create issues for the Borough in the context of housing land supply commitments (i.e. delivering on the Local Plan housing requirement). Through the Draft Local Plan consultation in 2023 Elmbridge District commented: “*We consider that the... trajectory [is] well presented and the Council has been transparent in terms of its land supply and how much of the local housing need requirement that can be met.*” CPRE Surrey commented through the consultation that there should be increased supply of housing in the urban area, and also that there should be an increased focus on delivering affordable housing in the urban area, but the Local Plan’s ‘urban capacity’ figure must be based on sound technical evidence and must also account for development viability.¹⁰
- 5.2.47 Secondly, there is a need to consider issues/opportunities specific to **Longmead and Kiln Lane Industrial Estates**. In this regard the situation is broadly unchanged from that reported within the equivalent section of the Interim SA (ISA) Report published at the time of the Draft Plan consultation (2023):

“The question of whether to maintain existing industrial uses at these two adjacent industrial estates or, alternatively, support a degree of mixed-use redevelopment (to include consolidated and intensified industrial uses), has been given close attention over recent years, including: through: the local plan issues and options [consultation](#) (2017); a capacity [study](#) (2018); an economic growth [strategy](#) (2020, plus 2021 addendum); a study completed by the Coast to Capital Local Enterprise Partnership (LEP, 2022); and a Housing and Economic Development Needs Assessment (HEDNA, 2022).

In light of all the evidence, the current view is that there is no reasonable growth scenario involving housing supply from the industrial estates (within the plan period). It is recognised that the industrial estates benefit from very good proximity to Epsom town centre (to the south; also Ewell West Station to the north), and that the effect of delivering new housing here would be to reduce pressure on the Green Belt, but there is a clear need to avoid impacting on the economic functioning of the industrial estates, and there are practical challenges to effective mixed use redevelopment / intensification. It could be that further work serves to identify deliverable or developable housing supply (see NPPF paragraph 69), but no such supply can be identified at the current time, such that any reliance placed on supply from the industrial estates would risk ‘setting the plan up to fail’. Specifically, there would be a risk of housing supply in practice dropping below the housing requirement, leading to a risk of punitive measures.”¹¹

¹⁰ For example, CPRE commented: “*The Council should be examining every opportunity to build genuinely affordable homes within our urban area. These should not be subject to developers’ viability studies that seek to minimise the number of affordable properties on their estates. Other local authorities, such as Portsmouth, Norwich and Doncaster, are working proactively to build for social rent and Epsom and Ewell should be doing likewise to tackle the Borough’s genuine housing needs.*” We agree that there is a need to work proactively in this respect, but Council funding is somewhat outside of the scope of the Local Plan.

¹¹ The latest situation is that there is one proposed allocation on the edge of the industrial area that is currently a car showroom.

5.2.48 Outside of the main urban area the other key area ‘inset’ from the Green Belt is the village of **Langley Vale** (there is also ‘the Wells’, which is a small residential area), but there is no significant development opportunity within the confines of the village (the option of village expansion is discussed further below).

The Green Belt

5.2.49 Firstly, there is a need to consider the ‘**hospitals cluster**’, which comprises five large, former psychiatric hospitals, all of which have now been redeveloped for housing whilst retaining their historic cores as conservation areas (discussed further at: www.epsom-ewell.gov.uk/conservation-areas). Two were redeveloped prior to the Core Strategy (2007), whilst the redevelopment of a third (Horton) was underway at the time of the Core Strategy, and the remaining two have been redeveloped subsequently (West Park and St. Ebba’s), in line with policy set through the Core Strategy.

5.2.50 All five sites remain within / ‘washed over’ by the Green Belt, but the proposal is now to ‘inset’ those parts that have been comprehensively redeveloped. This could feasibly enable a degree of infilling development, but this is not likely to be significant. What is more significant is two sites at West Park / Noble Park (one within the conservation area and one adjacent) that remain in use as NHS buildings but are surplus to requirements. These sites are available for development and are discussed further below.

5.2.51 The final broad area for consideration is the **remainder of the Green Belt**. The [Green Belt Study](#) (2017) identified 53 parcels in total; however, five of these are associated with the aforementioned hospital cluster, and numerous others are associated with land that does not come into contention for housing growth under any reasonably foreseeable scenarios, including Epsom Common, Epsom Downs, Horton Country Park and several large areas of land designated as a Site of Importance for Nature Conservation (SNCI). This is immediately apparent from Figures 2.1 and 2.2 presented above in Section 2.

5.2.52 Having accounted for headline constraints, there are four broad areas within the Green Belt that come into consideration for growth. Figure 2.2 is repeated below with these broad areas shown – see Figure 5.4. The figure highlights the following broad areas (henceforth ‘sub-areas’ for further consideration):

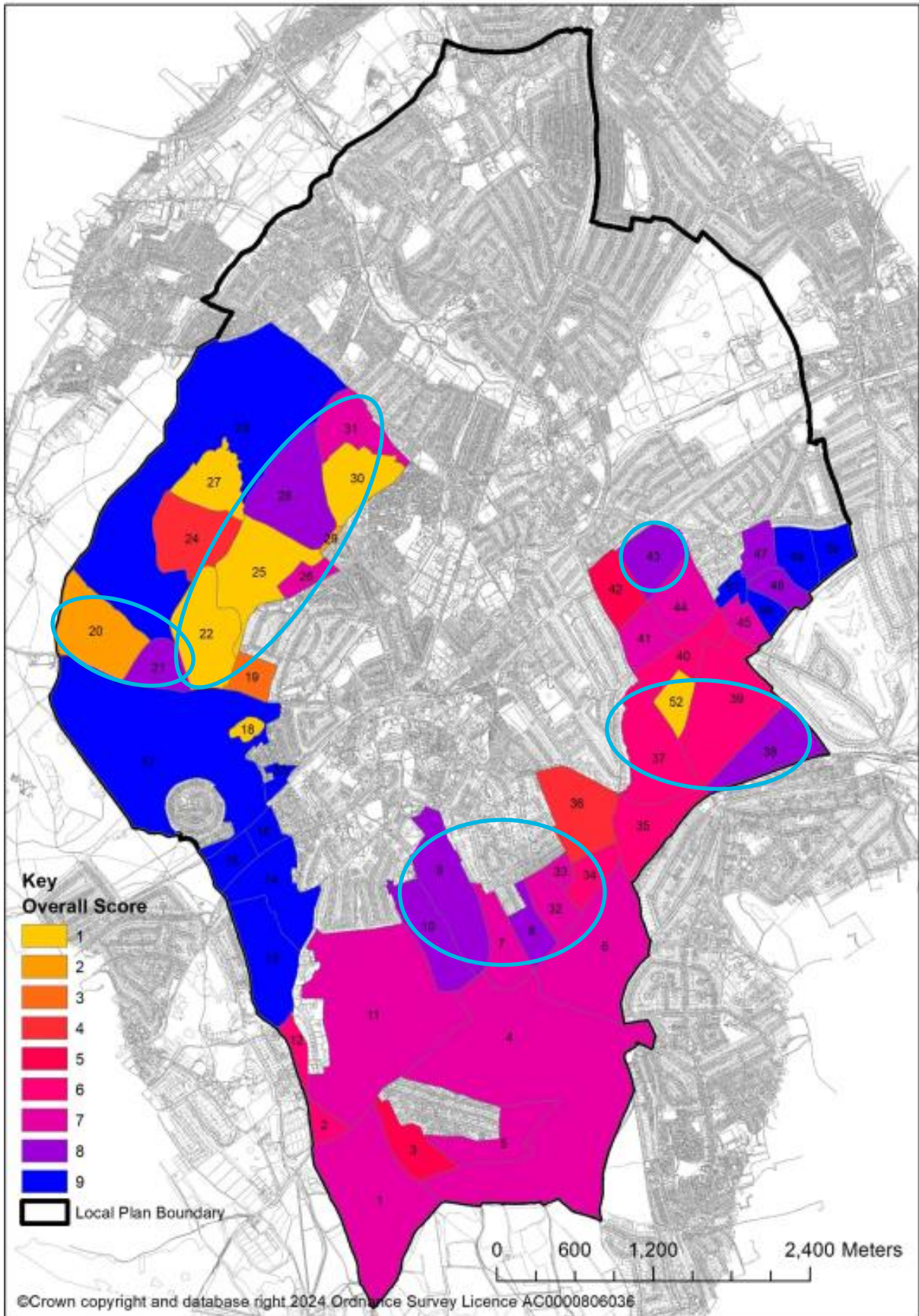
- **West** – the first point to note is that parcel 23 comprises Horton Country Park (HCP, which is also mostly designated as an SNCI and a Local Nature Reserve, LNR), and the second point to note is that all of the low sensitivity Green Belt parcels comprise land that is already developed (or mostly so), mainly the aforementioned hospitals cluster. Parcel 24 can then also be discounted, given that none of the land has been submitted as available, and given the existing land uses, namely a children’s play park and an equestrian centre linked to HCP (see points 10 and 14 on this [leaflet](#) introducing HCP) and a large gym. Otherwise, there are numerous key site options within this area that are explored further below.

To the south of the area highlighted in Figure 5.4 there are no available sites, and the dominating feature is Epsom Common SSSI. Parcel 13 comprises a significant area of undeveloped land, and it was discussed in Section 5 of the Interim SA (ISA) Report (2020) but was not then submitted as available.¹²

- **South** – this is a key area of greenfield land, with several sites being actively promoted, although there are clear landscape sensitivities, and this area is not very accessible / well-connected. Parcel 7 is Epsom Cemetery and parcels 9 and 10 are not available for development. Land south of the highlighted area mainly comprises RAC golf course and Epsom Downs, and then parcels 2 and 12 can also be discounted as they are small parcels and not available, plus this area is not accessible or well-connected. This then leaves Langley Vale, which is not well-suited to growth, but is discussed further below.
- **East** – parcel 36 comprises Epsom College, and then to the northeast is a key cluster of greenfield site options for discussion below. Parcel 35 is not available for development but is discussed further below.
- **Northeast** – there is a key site option for discussion adjacent to Ewell East Station, but otherwise there is very limited land feasibly in contention. Parcel 42 is NESCOL college and associated land, whilst adjacent parcel 43 comprises sports pitches, and there is no suggestion of any of this land becoming available. Much of the remaining land in this sector is designated as an SNCI and remaining parcels are mostly small and poorly connected (and not available). A final parcel for consideration is then Parcel 45, but it is not being comprehensively promoted and this is a narrow settlement gap.

¹² The ISA Report explained: “One parcel of land that is not subject to headline constraints is at the southwest extent of the borough, adjacent to Ashtead, but land here is seemingly in use as a stud farm and is poorly connected in transport terms, particularly as direct access to the A24 is blocked by an area of wooded common land. The possibility of modest housing growth with access from the west might be envisaged, but there is a significant surface water flood channel along the western boundary of this land parcel (the headwaters of the Rye) plus the adjacent common land.”

Figure 5.4: Overall contribution to GB purposes (total of three individual scores)⁵ with 'sub-areas' overlaid



5.2.53 Maintaining a focus on Figure 5.4, the following bullet points present an overview discussion of parcels in ascending order of Green Belt sensitivity (recalling that the figure shows a total score for each parcel that is the sum of three individual scores against purposes; see discussion under footnote 6, above):

- Parcels with a total **score of 1 to 5** – all comprise developed or mostly developed land, including the aforementioned hospital cluster, with two exceptions. Firstly, parcel 29 is a very small site that was proposed for allocation in the Draft Local Plan, namely Chantilly Way. Secondly, parcel 3 is associated with Langley Vale, where there is limited strategic case for growth, as discussed above (and below).
- Parcels with a total **score of 6** – there is a cluster of sites to the east of Epsom, although one of these can be more-or-less ruled out on account of comprising an SNCI (parcel 40). Of the remaining four parcels in this area, one relates well to the existing urban edge and is being actively promoted (Downs Farm). It was a focus of consideration through the SA process in 2023 (although it was ultimately not proposed for allocation) and requires further detailed consideration at the current time (Section 5.4). Finally, parcels 2 and 12 at the southwest extent of the Borough can be discounted, as discussed.
- Parcels with a total **score of 7** – beginning with the two parcels to the west of Epsom, both do require further consideration below, and one was previously an allocation in the Draft Local Plan (parcel 31; Hook Road Arena). There are then three parcels in the northeast of the Borough, of which two can be more-or-less ruled out on account of comprising playing pitches (parcel 41) or an SNCI (parcel 44), leaving only parcel 45, which has been introduced above as performing quite poorly as a site option. The remaining parcels are then in the south and attention focuses on parcels 32 and 33, with others comprising a cemetery (parcel 7), RAC golf course (parcel 11) or an SNCI / Epsom Downs.
- Parcels with a total **score of 8** – the majority are available for development and do require detailed consideration below (Section 5.4), despite Green Belt sensitivity. The only one that is more-or-less ruled out is parcel 47, which comprises an SNCI, plus adjacent parcel 48 does not adjoin a settlement.
- Parcels with a total **score of 9** – there would obviously be a high bar to reach in terms of evidencing exceptional circumstances that ultimately serve to justify releasing any of these parcels from the Green Belt. In practice many are subject to headline constraints, and none have been promoted as available.

5.2.54 In summary, the number of homes that can be delivered at sites in the Green Belt that make a limited contribution to Green Belt purposes is very low. There is then one parcel with a total score of 6 that is available for development and so must be given detailed consideration. The remaining Green Belt site options that are feasibly in contention for allocation then score of either 7 or 8 but must be explored in detail nonetheless, given: A) the stretching nature of the Borough's LHN figure; B) the need to set a housing requirement as close to LHN as possible (or at LHN); and C) limited non Green Belt supply.

5.2.55 Final broad spatial strategy considerations in respect of Green Belt growth options are as follows:

- Strategic sites – with a housing capacity of several hundred or more are broadly supported in wide-ranging respects, over an alternative strategy of delivering an equivalent number of homes via 'piecemeal' growth. Strategic sites can benefit from economies of scale with positive implications for development viability and, in turn, positive implications for infrastructure delivery, affordable housing and wider policy asks (e.g. net zero development), and strategic sites can be masterplanned with a focus on delivering a good mix of homes and wider uses, green and blue infrastructure and design measures aimed at quality placemaking. The NPPF is supportive of strategic sites at paragraph 74, and Mole Valley District Council notably commented through the consultation in 2023:

"... it is clear that the needs for health and education provision... arising from projected and planned growth have yet to be quantified. To ensure infrastructure delivery, MVDC urges EEBC to look at incorporating provision to meet these needs within the site allocations."

- A good mix of sites – it is important not to rely overly on strategic sites or other sites associated with delivery risk (including complex urban sites) and, similarly, to ensure a geographical spread of sites recognising that local market saturation can lead to the delivery delays. In practice, this means that there is a case for supporting smaller greenfield sites with low delivery risk and which will typically be able to deliver early in the plan period. This is an important consideration for the current Local Plan, as in order to be found sound at Examination there will be a need to demonstrate that there will be a five year housing land supply at the point of plan adoption (see the recent Spelthorne Report to members for a discussion on the importance of supporting sites able to contribute to a 5YHLS at adoption).
- Clusters of sites – can sometimes deliver benefits in terms of placemaking, infrastructure delivery (e.g. cycle infrastructure) and maintaining/enhancing bus services. Opportunities are explored in Section 5.4.

5.3 Site options

- 5.3.1 This section considers the individual site options that are the building blocks for growth scenarios.
- 5.3.2 The starting point is Land Availability Assessment ([LAA](#)), which considers a long list of site options and for each one reaches a conclusion on whether the site is 'deliverable' (able to deliver within 5 years) or 'developable' (able to deliver within the plan period) after having determined that the site is both:
- Available and achievable – meaning there is a reasonable prospect of development accounting for development viability and assuming that the site will be delivered in a way that accords with standard policy asks, e.g. affordable housing. This is not always clear cut, particularly where the land is currently in a profitable use and recognising the costs and risks involved with seeking planning permission.
 - Suitable – the aim is to reach a high level conclusion in light of a basic set of standard criteria. There is a clear recognition that sites deemed to be suitable through a LAA will not necessarily be deemed suitable for allocation through the local plan, in light of: A) more detailed analysis of the site, as discussed below; and B) consideration of the site in combination with others (at a range of scales, e.g. at the very local scale, at the settlement scale and at the district-scale), as discussed in Section 5.4.
- 5.3.3 The LAA outcomes are shown in the figure below, and the key point to note is that 'discounted' sites are all outside of the Green Belt. The great majority of these are sites that were proactively identified by EEBEC Officers through a desktop review, but then confirmed as not available (after having written to landowners).
- 5.3.4 The LAA identifies 28 urban sites as deliverable or developable for residential, and then the LAA is supplemented by further criteria-based assessment as reported in the Council's Site Assessment paper. This mainly confirms and bolsters the LAA but does flag additional issues with three Green Belt sites (HOR012, HOR014 and NON038) to the extent that they need not be considered further below.

Figure 5.5: Screenshot from the Council's online interactive LAA (N.B. cuts off the north and south extents)



5.4 Sub-area scenarios

Introduction

- 5.4.1 Discussion has so far focused on A) ‘top down’ consideration of strategic factors (growth quantum and broad spatial strategy); and B) ‘bottom-up’ consideration of site options. The next step is to consider each of the Borough’s sub-areas in turn, exploring how sites might be allocated in combination.
- 5.4.2 A key aim is to ensure vision-led planning, recognising that sub-areas will typically be the scale at which key stakeholders identify strategic local plan-related issues and opportunities.

What sub-areas?

- 5.4.3 The following sub-areas have already been introduced above (Section 5.2):
- The urban area
 - Green Belt 1: West
 - Green Belt 2: South
 - Green Belt 3: East
 - Green Belt 4: Northeast

Methodology

- 5.4.4 The aim is to draw together the ‘top down’ and ‘bottom up’ inputs discussed above before concluding on ‘sub-area scenarios’ to take forward to Section 5.5, where the aim is to combine sub-area scenarios to form borough-wide RA growth scenarios for appraisal and consultation.
- 5.4.5 The aim here is not to present a formal appraisal, but rather to contribute to “an outline of the reasons for selecting” the reasonable alternative growth scenarios ultimately defined in Section 5.5. Accordingly, the discussions are systematic only up to a point, with extensive application of discretion and planning judgment. The aim is not to discuss all site options to the same level of detail, but rather to focus attention on those *judged to be more marginal*, i.e. where the question of allocation is more finely balanced.
- 5.4.6 This is a key opportunity to consider individual site options, building upon the Officer-led workstreams introduced in Section 5.3 (LAA, Site Assessment, Green Belt Study Update) but the aim is proportionate work that is undertaken as a means to an end (reasonable alternatives). The following is a criticism levelled at the equivalent work presented within the Interim SA Report (2024), but we do not agree that there is a requirement for SA to appraise individual site options in the manner described:

“... consideration as to the preferred growth scenarios and green belt release is set out in chapters 5 and 6 of the interim Sustainability Appraisal. The appraisal considers six potential growth scenarios... The conclusion from the considerations and assessments in the SA is that scenario 4, which delivers 327 dpa, is the preferred scenario and the one set out in the draft local plan. However, what isn’t provided is the detailed sites assessments that have informed the decision making process. The reasons for selection are broadly referred to in the SA but the Council will need to carefully consider the site specific circumstances for each site and the potential mitigation measures that could address any concerns alluded to in the SA. These more detailed assessments are a vital element in ensuring the soundness of the local plan and the evidence base supporting any decisions the Council makes.”

The urban area

- 5.4.7 The growth opportunity is considerable, and there is a clear need to maximise supply from the urban area in order to minimise pressure on the Green Belt, but this must be within reason, with conservative assumptions made regarding the supply of homes from complex or otherwise challenging urban sites.
- 5.4.8 The discussion in Section 5.2 serves to suggest no strategic choice to explore further through the appraisal of RA growth scenarios, but matters warrant being explored further here. However, there is no further consideration given to the possibility of *major* housing-led or mixed use redevelopment within Longmead and Kiln Lane Industrial Estates (accounting for a range of evidence including employment land needs).

- 5.4.9 The emerging proposed approach involves allocation of 28 of the 33 sites supported by the LAA, plus two recent prior approvals are also allocated (such that there are 30 allocations in the urban area).
- 5.4.10 There is little or no reason to question this approach for the purposes of defining RA growth scenarios. The great majority of the sites 'discounted' by the LAA are unavailable, and all of those that are available are judged to be unsuitable for clear cut technical reasons (as opposed to conclusions reached on balance that might warrant being explored further here). Two sites of note are: 1) the Water Works site is only partly available, and this part of the site is landlocked; and 2) Rainbow Leisure Centre Car Park must be retained (and capacity increased) given a proposal to develop Hook Road Car Park. These sites are adjacent and in a strategic location adjacent to the SGN site (a key strategic site).
- 5.4.11 With regards to the availability of sites, the importance of taking a cautious approach has already been introduced, and it is worth adding here that a considerable amount of work has been undertaken since the Draft Plan stage (2023) to confirm availability. This is an important element of good plan-making practice, e.g. as reflected in the following consultation response from Reigate and Banstead District in 2023:
- "We have some reservations regarding inclusion in the LAA of... sites... for which "availability" has not yet been established with landowners... These sites should only be included in the Regulation 19 consultation when they are shown to be available."*
- 5.4.12 Aside from the selection of sites for allocation, a key question is in respect of development density and other factors with a bearing on housing yield of sites assumed for the purposes of calculating the Local Plan housing supply trajectory (also, another key consideration is reaching a conclusion on *when* the site is expected to deliver within the plan period). Again, it is important to take a conservative approach to assumed densities and housing yields, as has already been discussed. This is another important element of good plan-making practice and is a focus of the Town Centre Masterplan. Also, the following consultation responses received in 2023 from Mole Valley District and Reigate and Banstead District respectively serve to highlight the importance of taking a conservative approach to urban supply:
- "MVDC supports EEBC's efforts to increase delivery through the minimum densities set out in Draft Policy S3, though it questions the extent to which character of certain areas within the Borough may make them inappropriate in a number of instances and, consequently, reduce the impact of this policy."*
- "We note that this policy includes minimum densities. However no maximum densities have been proposed. Have you undertaken a land intensification study for Epsom Town Centre to assess areas suitable for intensification and the scale of that intensification?"*
- 5.4.13 Finally, with regards to Longmead and Kiln Lane Industrial Estates, from Figure 5.5 it can be seen that there are three 'suitable' LAA sites on the edge of the estate(s). Taking these in turn:
- Southwest – is suitable only for employment due to flood risk.
 - North – this is a low quality amenity land now proposed for inclusion within the Strategic Employment Sites designation (a change from the Draft Plan stage).
 - Southeast – this is a new site in the LAA. It comprises a car salesroom and is proposed for allocation.
- 5.4.14 In **conclusion**, whilst two alternative approaches to urban supply were explored through the RA growth scenarios in 2023, at this stage it is appropriate to hold the approach to urban supply constant, such that there is **one reasonable sub-area scenario**.
- 5.4.15 Specifically, the proposal is to allocate 30 sites for a total of 1,416 homes. Of these, SGN Site is by far the largest at 455 homes (N.B. there is a current planning application, ref. [24/01107/FUL](#)), followed by Hook Road Car Park at 150 homes, and then followed by three sites with a capacity of around 100 homes.

Green Belt 1: West

- 5.4.16 This is a key area for consideration and is further broken down into 'north' and 'south' areas.

North

- 5.4.17 There are three key greenfield site options in this area (see Figure 5.5), which is defined as the area north of Chantilly Way, east of Horton Lane and southwest of the B2200. In 2023 these were judged to be the strongest performing greenfield Green Belt options, such that they featured in four of the six RA growth scenarios (see Figure 5.2, above) and were ultimately proposed for allocation in the Draft Local Plan.

5.4.18 This broad area has relatively good connectivity in terms of road and cycle infrastructure and bus services and has good access not only to Epsom town centre but also Ewell / Ewell West, retail parades (see Figure 5.3) and the strategic employment area at Longmead / Kiln Lane. There is also an opportunity to complement recent growth associated with the hospitals cluster and Horton Country Park is adjacent.

5.4.19 Taking the sites in turn:

- HOR010 (Chantilly Way) – is a small site (30 homes) with low Green Belt sensitivity (parcel 29). Epsom Civic Society commented through the consultation in 2023: “[Chantilly Way] was constructed in 1990’s to facilitate access to the hospital cluster. It cut across the edge of Horton Farm leaving a buffer strip behind the houses in Brettgrave which provided separation from the new road. The residual strip should have been de-classified to become non-Green Belt in past plan reviews but was not. No objection is raised to [allocation].” There is limited wider constraint (modest surface water flood risk, which can be avoided or suitably mitigated) and so, at this stage in the plan-making process (given the context discussed in Section 5.2), it can reasonably be progressed to the RA growth scenarios as a constant.
- COU026 (Hook Road Arena) – comprises Council-owned land and the proposal is to deliver approximately 100 homes at the eastern extent of the site in order to enable the western c.2/3 of the site to deliver a new sports hub for the Borough. This is parcel 31 shown in Figure 5.4, which has relatively low sensitivity in comparison to the other Green Belt options in contention for allocation. The site is subject to limited wider constraint (modest onsite surface water flood risk has implications for site masterplanning), and benefits from being within walking distance of Ewell West station. There is a strong argument for progressing this site as a constant (given the strategic context); however, it is recognised that there is significant local objection and so, on balance, it is progressed as a variable.
- HOR009 (Horton Farm) – comprises Green Belt parcel 28, which is sensitive, but this sensitivity potentially reduces once account is taken of adjacent Green Belt comprising redeveloped former hospitals sites and Horton Country Park. The site represents a near-unique opportunity to deliver a strategic scale scheme, and whilst latest understanding is that there is no requirement for the site to deliver a primary school, it could deliver a new health facility as well as other infrastructure benefits. This is a low lying and relatively flat part of the Borough, which translates into relatively limited landscape sensitivity, and the site can also deliver Gypsy and Traveller pitches as part of mixed use scheme. Overall, there is a strong case for allocation, but there are also issues/constraints (e.g. surface water flood risk), and it is recognised that there is a high level of local opposition. It is progressed as a variable.

South

5.4.20 Firstly, there are two **Green Belt PDL sites**, which have already been introduced above, namely HOR005 and HOR006/008. They were judged to perform very strongly in 2023, to the extent that they were held constant across the RA growth scenarios at that stage (and, in turn, were allocated in the Draft Local Plan.

5.4.21 Redevelopment of these sites would largely complete the redevelopment of the Borough’s former hospitals land, and there was support through the consultation, including from CPRE and Epsom Civic Society. The new proposal is to extend the northern site with the addition of HOR008, such that ~200 homes are delivered across these sites in total as opposed to 150 homes as proposed in 2023, but this generates few concerns. HOR008 comprises New Epsom and Ewell Community Hospital, which is largely vacant, with services already having been relocated as part of a wider NHS consolidation programme.

5.4.22 To conclude on HOR005 and HOR006/008, they are once again progressed as constants.

5.4.23 Next there is a need to consider an adjacent **cluster of greenfield sites**, namely HOR002, HOR003 and HOR007. The option of a coordinated scheme for 430 homes was explored as a variable across the RA growth scenarios in 2023. However, because this option was judged to perform poorly relative to other Green Belt allocation options (discussed below), it was assumed only under the highest growth scenario.

5.4.24 The situation has now moved on somewhat, particularly in the sense that there is reduced potential for a coordinated scheme across the three sites. Taking the sites in turn:

- HOR007 – is at the western extent of the cluster and was actively promoted for 80 homes through the consultation in 2023. Figure 5.6 shows the location of the site adjacent to Noble Park (the new name for West Park following redevelopment) and it should also be noted that adjacent to the west of the site is the southern PDL site proposed for allocation in 2023 and discussed above.

- HOR002 – is the central site in the cluster, located adjacent to the east of HOR007. This site was not actively promoted through the consultation in 2023, and there is onsite constraint in the form of priority woodland habitat and a pond that, whilst not locally designated as an SNCI, takes on added value on account of clear links to Epsom Common SSSI, which is near-adjacent to the south. The site was formerly the grounds of a large historic house which is now in ruins, hence there is some PDL.
- HOR003 – is located to the east of HOR002 (separated by Horton Lane). This is Council-owned land and is now being considered for biodiversity enhancements.

5.4.25 Otherwise the constraints highlighted through the appraisal in 2023 continue to apply. In particular:

- Biodiversity – given a location between Epsom Common SSSI to the south and Horton Country Park SNCI to the north, also noting the onsite priority habitat and also mature field boundaries (shown on historic mapping; mainly TPOs). The three sites together serve a clear green infrastructure function, including HOR007 noting a long distance footpath passing along its edge that links Epsom Common and Horton Country Park, and it is not clear that any proposal to deliver biodiversity enhancements within HOR003 (to the east) increases the case for development within HOR002/007 (to the west).
- Historic environment – given a location between two components of the Hospitals Cluster Conservation Area. Indeed, it may also be that HOR007 and HOR002 fall within the Conservation Area, although this is unclear (as previously discussed in the Interim SA Report, 2023).¹³
- Green Belt and landscape/visual – whilst there is limited landscape and visual sensitivity, as set out in the Green Belt Study Update (2024), there is a clear Green belt sensitivity, with HOR007 and HOR002 together comprising a Green Belt parcel with a total score of 8.

5.4.26 Overall, when viewing this cluster in isolation blind to the strategic context, there is now considered to be a reduced case for allocation, relative to the situation in 2023, because it is less clear that there is the potential to take a holistic approach to development that carefully accounts for biodiversity / green infrastructure, historic environment and Green Belt sensitivities. Nonetheless, the strategic context is such that there is a case for progressing HOR007 and HOR002 to the RA growth scenarios.

Figure 5.6: Figure submitted by the HOR007 promoter showing the site in context



¹³ It is noted that the HOR007 site promoter submitted a Heritage Assessment through the consultation in 2023, which made three recommendations: 1) Reconsider and clarify the boundary of the West Park Conservation Area, including updating the Conservation Area Appraisal; 2) A more detailed heritage appraisal to be undertaken to understand potential site suitability before sites are excluded and to resultantly inform consideration of their development potential; and 3) Consider a more holistic, masterplan-led approach to the Hospital Cluster which also includes the site allocations of 'Land to the east of West Park former hospital site'. With regards to recommendations (1), further research has been undertaken, and to the best of our knowledge a decision was made by the Council's Strategy and Resources Committee on 30th June 2009 to extend the conservation area to include HOR003 and HOR002, and we have not been able to find any subsequent decision to remove this area from the conservation area. With regards to point (2), it has not been possible to undertake any further detailed work. With regards to point (3), there is now considered to be reduced potential to take a holistic, masterplan-led approach to the Hospital Cluster.

- 5.4.27 Next there is a need to consider adjacent sites **HOR001** and **HOR004**, which are located to the east of HOR003 (the Council-owned site discussed above) and can be seen at the eastern edge of Figure 5.6.
- 5.4.28 They have low Green Belt sensitivity, are subject to limited constraint in wider respects (TPOs serve to reduce capacity) and have good accessibility credentials, given proximity to the town centre. However, the emerging proposed approach is not to allocate either site, particularly with a view to maintaining the integrity of the Green Belt in this broad area, but also noting the nearby SSSI (and given onsite TPOs).
- 5.4.29 This decision is finely balanced, such that it could potentially be examined further through the appraisal of RA growth scenarios. However, on the other hand, the combined capacity of these sites is very low (~40 homes) in comparison to other sites that must be a focus of work to explore RA growth scenarios.
- 5.4.30 Next, **HOR011** includes TPOs and intersects a significant surface water flood zone, plus the Green Belt Study Update (2024) explains: *“It’s location at a prominent corner means the visual sensitivity is high. The site is currently heavily vegetated and views in and out are limited. It forms part of a green buffer between the residential area and main road, Horton Lane. The site is also high sensitivity due to the historic setting set within a highly managed parkland setting.”* It may include some PDL elements, as discussed within the consultation response received from the site promoter in 2023, but any capacity would be very low, such that it need not be considered here. Indeed, there is currently a pending application for one dwelling.
- 5.4.31 Finally, **HOR012 and 14** are ruled out by Site Assessment, as discussed in Section 5.3.

Conclusion on the west sub-area

- 5.4.32 In addition to the two PDL sites (200 homes) there is now a clear case for progressing Chantilly Way to the RA growth scenarios (Section 5.5) as a constant (30 homes). Hook Road Arena is then progressed as a variable (100 homes), but this conclusion is reached ‘on balance’. Horton Farm then clearly needs to be progressed as a variable (1,250 homes), and there is a question-mark regarding whether or not to progress HOR007 / HOR002 (150 homes might be assumed). This suggests **four sub-area scenarios**:
- Scenario 1 – PDL sites plus Chantilly Way
 - Scenario 2 – Scenario 1 plus Hook Road Arena
 - Scenario 3 – Scenario 2 plus Horton Farm
 - Scenario 4 – Scenario 3 plus HOR007 / HOR002

Green Belt 3: South

- 5.4.33 There are three nearby site options here (COL017, COL019, COL023) and the option of a coordinated scheme for 550 homes was explored as a variable across the RA growth scenarios in 2023. However, because this option was judged to perform poorly relative to other Green Belt allocation options (discussed above), it was assumed only under the highest growth scenario.
- 5.4.34 An immediate point to note here is landscape sensitivity and relatively low levels of accessibility and connectivity, as discussed in Section 5.2. Taking the three sites from west to east:
- COL023 (Downs Road) – the promotion is for 160 homes alongside extensive green infrastructure (see Figure 5.7), with the site promoters explaining:

“Ecology surveys have shown that calcareous grassland is present on the Downs Road site, therefore a comprehensive biodiversity enhancement scheme is proposed to mitigate any losses of habitat due to development. It is proposed to use c. 28ha of nearby land within the site promoters ownership for habitat enhancement and biodiversity offsetting. The scheme will also create new public access, footpaths, cycle routes... The biodiversity sites... will be managed in a variety of ways to...”

However, a consideration is a possible conflict with objectives around racehorse training.
 - COL017 (West of Burgh Heath Rd) – this site is proposed for 50 homes, and a key point to note is an adjacent site under construction for a scheme involving a new racehorse training establishment and 46 apartments ([18/00308/FUL](#)). The effect will be to reduce the site’s landscape and Green Belt sensitivity.

- COL019 (East of Burgh Heath Rd) – there is less certainty regarding what is proposed, or what might be appropriate, on this site, with no consultation response having been submitted in 2023. There are multiple land ownerships within the LAA site, but the most logical option would appear to be development of the northwest part of the site most closely related to existing/proposed built form, e.g. for 100 homes. The Green Belt Study Update (2024) suggests slightly lower landscape/visual sensitivity here, compared to the other two sites in the cluster, but raises a significant concern regarding securing a new defensible Green Belt boundary. Historic satellite imagery suggests past equestrian (potentially horseracing) uses.

Figure 5.7: Location of COL023 (pink) and associated GI land (yellow) also showing COL017 and COL019



- 5.4.35 There is also a need to note **four other sites** located close to the three discussed above. Firstly, WOO019, COL020 and COL021 are linked to COL023 (see Figure 5.7) and not proposed for housing. Secondly, COL022 is a very small site to the south of Epsom Cemetery comprising a single house in a large plot. It would not adjoin a settlement edge even if COL023 were developed (in line with Figure 5.7).
- 5.4.36 Finally, there is a need to consider **Langley Vale**, and in particular WOO020, which is located to the south of Langley Vale (north of Langley Bottom Farm) and is being actively promoted for 100 homes. The situation here has not changed greatly from 2023, at which time Section 5.3 of the ISA Report stated:

“Langley Bottom Farm is adjacent to the south of Langley Vale, which is a small village developed as a new settlement in the early 20th Century. The village lacks a centre, and overall has limited facilities, but there is a primary school, a good-sized village hall and some limited retail provision at a petrol station (a small shop / news agent recently closed). There is also excellent access to high quality countryside, including [Langley Vale Centenary Wood](#). The site in question comprises a single field to the south of the village and is the only feasible location for a significant extension to the village, with a view to delivering new community infrastructure and supporting wider place-making. Also, the possibility of a new defensible Green Belt boundary can be envisaged, given woodland to the east and Ebbisham Lane to the south, which marks the northern extent of the Centenary Wood, and where there is a cluster of farm buildings with planning permission for a 20 home redevelopment (ref. [20/00475/FUL](#)).

However, the site is clearly constrained in landscape terms, as it comprises the northern extent of the Area of Great Landscape Value (AGLV) designation within the borough, which is a Surrey-wide designation that essentially comprises an extension of the Surrey Hills [National Landscape]... The land rises steeply from the south (from Ebbisham Lane towards the village) and is prominent within the landscape, including as viewed from two adjacent bridleways (one being Ebbisham Lane) and from Langley Vale Road (at least glimpsed views). The site is also adjacent to Epsom Downs [SNCI]... [and] Langley Vale has poor transport connectivity, in comparison to other locations under consideration that are closer to Epsom town centre and/or a rail station. There is only a limited bus service direct from Langley Vale to Epsom."

- 5.4.37 However, there is new evidence in the form of the Green Belt Study Update (2024), which raises additional concerns, including around securing a defensible new Green Belt boundary. The study concludes:

"Landscape and visual sensitivity are high and there is a high overall sensitivity to development where the impact on openness considered to be high. The existing urban edge is rounded off and clearly delineated. The proposed site boundaries do not follow a recognisable feature that is likely to be permanent and is considered to be weak and would extend the urban edge in awkward manner. Therefore the overall integrity of the Green Belt in this location would be considered compromised..."

- 5.4.38 In **conclusion**, it is again appropriate to explore the possibility of growth within the COL017/019/023 cluster as a variable across the RA growth scenarios, with an assumption of 310 homes in total. The other site options discussed here can then be ruled out, such that there are **two sub-area scenarios**:

- Scenario 1 – no allocation
- Scenario 2 – allocate COL017, COL019 and COL023

Green Belt 4: East

- 5.4.39 Downs Farm (NON016) has already been introduced as a key site that featured as a variable across the RA growth scenarios in 2023, although it was not proposed for allocation in the Draft Local Plan. Issues include: landscape constraint (as well as a clear sensitivity relating to settlement separation, the land in this area begins to rise towards the Epsom Downs); and transport connectivity (good access to A-roads in this area does not necessarily translate into good access to key destinations by bus or by cycling, and Epsom Downs station is not easily accessed and has a limited service).

- 5.4.40 The site was actively promoted through the consultation in 2023, although the promotion (site vision, concept plan etc) was not updated in any way in response to issues raised through the appraisal of RA growth scenarios. The site is promoted for 675 homes and wider uses including a primary school, and overall clearly warrants being explored once again as a variable across the RA growth scenarios.

- 5.4.41 There are then two other sites adjacent to Downs Farm, which did not feature as a variable across the RA growth scenarios in 2023 (i.e. they were ruled out in Section 5.4 of the ISA Report):

- NON042 – is located adjacent to the south of Downs Farm and is in the control of the same site promoter. It is clearly highly sensitive in Green Belt terms, in that the effect of development would be to close the gap to Nork/Banstead, although it does benefit from proximity to Epsom Downs station. It is not proposed for development, but rather is proposed as greenspace. However, there is a lack of clear commitment to retaining the land as accessible greenspace in perpetuity, i.e. it could be the case that allocation of Downs Farm would result in this site being proposed for housing in due course (this concern was raised clearly in the Interim SA Report, 2023). In conclusion, whilst the land parcel is considered further below alongside Downs Farm, the option of development is ruled out at this stage.
- NON021 (Drift Bridge Farm) – there is limited landscape sensitivity, but this is a sensitive Green Belt parcel (parcel 38) including noting limited potential to define a new defensible boundary (see the Green Belt Study Update, 2024) and, in turn, a risk of development 'creep' downhill to the north. It is subject to limited wider environmental constraint, but existing road access is potentially problematic, given proximity of the A240/A2022 junction and a railway bridge. This was raised as an issue within Section 5.4 of the Interim SA Report (2023), but then no consultation response was subsequently received from the site promoter. Banstead station is nearby 'as the crow flies' but is >2km distant by current walking routes (assuming new access cannot be achieved, which would be challenging and potentially problematic). The site relates more closely to Banstead than Epsom and can be ruled out at this stage.

- 5.4.42 The final LAA site in this area is then NON040, which is a very small PDL site within an existing industrial/commercial area. The ISA Report (2023) considered this employment area more broadly:

“Land North East of Reigate Rd (A420) comprises a light industrial area, a plant nursery and a composting facility, such that there is considerable existing built form. However, releasing land from the Green Belt would risk greatly compromising the integrity of the gap between Epsom and Banstead, including given limited potential to define a new defensible Green Belt boundary... A development of 15 homes adjacent to the north of the site was delivered in 2015, but this was to enable Priest Hill Nature Reserve (which does assist with providing some containment within the landscape; also, there is a significant surface water flood channel between the site and North Looe Estate). Further considerations include: the value of existing uses onsite; the lack of bus services along the A240 (this is also an issue for Drift Bridge Farm and Downs Farm); and pedestrian / cycle connectivity and road safety along the A420 (it is noted that an offroad cycle route begins ~700m to the north, which might feasibly be extended).”

- 5.4.43 Focusing on the site currently being promoted as available (NON040), whilst it would relate reasonably well to the small new residential development to the north in built form terms, it would share an access with the remaining industrial/commercial area, which could create challenges and lead to pressure for further loss of employment land for residential over time and, in turn, there could be increased pressure to erode the sensitive Green Belt gap between Epsom and Nork (noting adjacent Downs Farm). Overall, whilst there is a need to give ongoing consideration to the commercial value of this area relative to potential value for residential, capacity of the site in question would be very low such that it is not considered further.
- 5.4.44 In **conclusion**, there is a clear need to progress Downs Farm as variable, whilst the other sites discussed can be ruled out at this stage, such that there are **two sub-area scenarios**:
- Scenario 1 – no allocation
 - Scenario 2 – Downs Farm

Green Belt 4: Northeast

- 5.4.45 As discussed in Section 5.2, attention focuses on a site adjacent to Ewell East Station, namely NON013.
- 5.4.46 In 2023 the option of a 350 home allocation here was judged to be one of the better performing greenfield Green Belt options, such that it featured in three of the six RA growth scenarios (see Figure 5.2, above) and was ultimately proposed for allocation in the Draft Local Plan.
- 5.4.47 There is Green Belt sensitivity (the allocation in 2023 comprised the northeast half of parcel 43 shown in Figure 5.4, with the remaining land in the parcel proposed to remain as sports pitches for NESCOL) and there is also constraint in the form of an adjacent SNCI, but a clear benefit of this site is its location adjacent to a train station. Also, the proposal was for the site to deliver some new retail space.
- 5.4.48 However, the situation has now moved on in that there is an issue with the availability of the land. This is because the land is currently used by two rugby clubs and, whilst the assumption in 2023 was that these clubs would be relocated, there is no longer clarity on this point (it has been confirmed that two rugby clubs have long leases without break clauses), and Sports England has concerns regarding any loss of playing pitches. There could well be the potential to reach an agreement with the sports clubs in respect of relocation, noting discussion above regarding the potential for a new sports hub at Hook Road Arena, but at the time of writing there is no such agreement.
- 5.4.49 A final consideration is that there is some modest PDL land within the site (hardstanding very close to the train station) that is in the control of the freeholder (not the sports clubs) that could potentially be considered for development, but at the time of writing it is not clear there is a significant opportunity.
- 5.4.50 Further considerations in respect of this sector of the Borough are:
- NON041 – comprises NESCOL college and is proposed for education and leisure uses.
 - NON038 – is ruled out by the Site Assessment on account of fragmented landownership (plots). Also, there would be a clear concern regarding greatly eroding the remaining settlement gap (although there is a SNCI adjacent to the north such that there would be little risk of complete coalescence).
 - Remaining land – in this sector is not available and comprises sports pitches, land designated as an SNCI or land with poor connectivity, plus much is shown as highly sensitive Green Belt.

5.4.51 In **conclusion**, there is a strong case for not progressing NON013 to the RA growth scenarios on account of the availability issues. However, on the other hand, this is potentially a key site for the Borough on account of its scale and because its excellent access / transport credentials, and there is the potential for it to become available. As such, and on balance, it is progressed to the RA growth scenarios as a variable, such that there are **two sub-area scenarios**:

- Scenario 1 – no allocation
- Scenario 2 – Land adjacent to Ewell East Station

Conclusion on sub-area scenarios

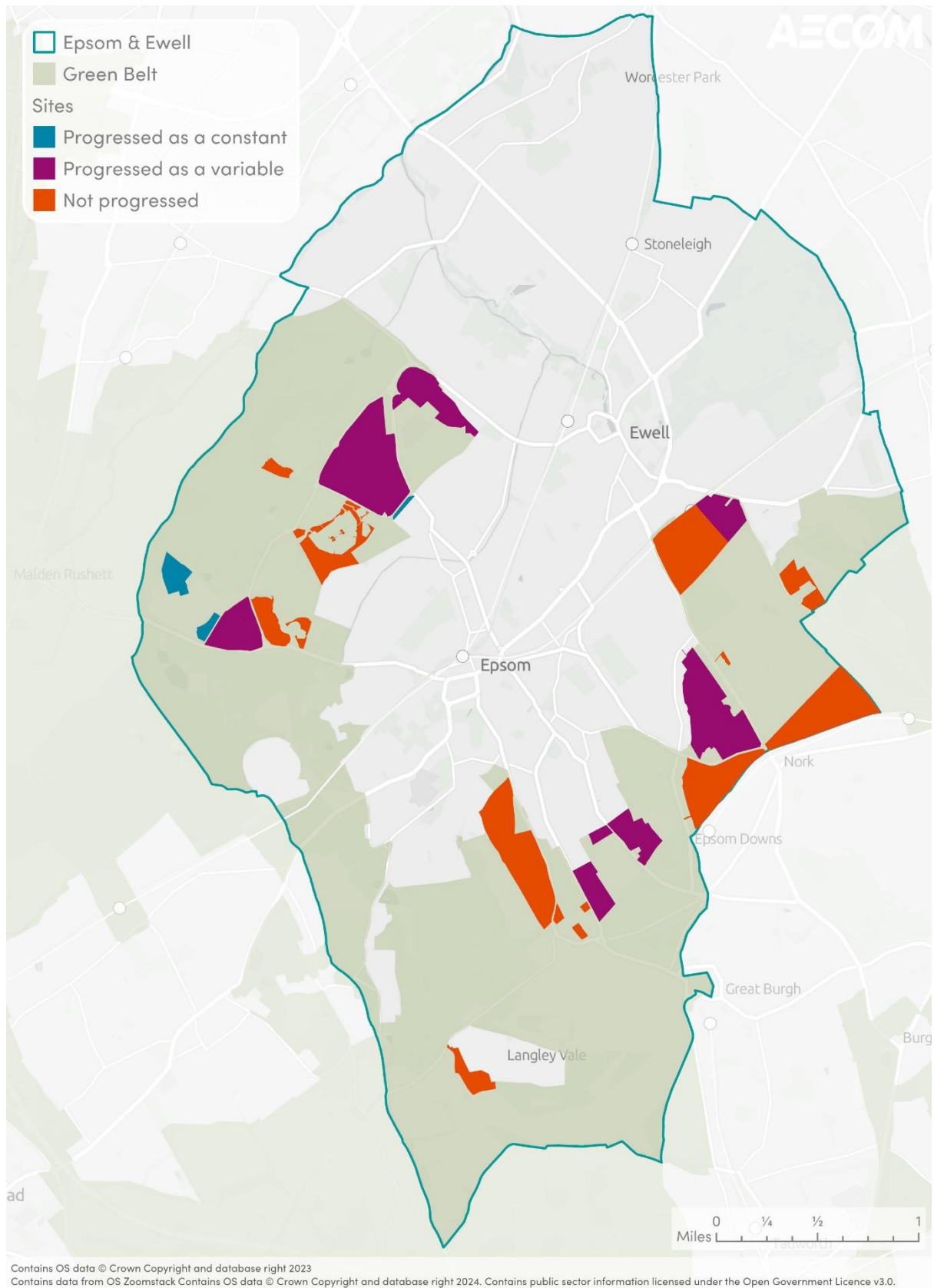
5.4.52 Table 5.1 summarises the sub-area scenarios defined on the basis of the analysis presented above (informed by Sections 5.2 and 5.3). In summary, each of the sub-area scenarios comprises a combination of site allocation options, and all options are treated as either a ‘constant’ or a ‘variable’.

5.4.53 Figure 5.8 then shows all of the site options that feature in the sub-area scenarios / are progressed to Section 5.5, differentiating between those progressed as a constant and those progressed as a variable. Also, the figure shows Green Belt LAA sites discussed above but not progressed (i.e. ruled out).

Table 5.1: Sub-area scenarios (allocations only, i.e. excluding supply from completions, permissions and windfall)

Sub area	Scenarios	Total homes from allocations
Urban area	1) 30 allocations	1,416
West	1) Hospital PDL sites plus Chantilly Way	230
	2) Scenario 1 plus Hook Road Arena (100)	330
	3) Scenario 2 plus Horton Farm (1,250)	1,550
	4) Scenario 3 plus HOR007 / HOR002 (150)	1,700
South	1) No allocation	0
	2) COL017, COL019 and COL023 (310)	310
East	1) No allocation	0
	2) Downs Farm (675)	675
Northeast	1) No allocation	0
	2) Land adjacent to Ewell East Station (350)	350

Figure 5.8: Green Belt LAA sites progressed to the growth scenarios (constant or variable) and not progressed¹⁴



¹⁴ This map shows the full extent of LAA sites, but for one of the sites in the 'Southern Cluster' (COL019) the assumption here, for the purposes of defining/appraising RA growth scenarios, is that the site would be developed in part (specifically only that part most closely linked to the existing urban edge). Also, another site in the Southern Cluster (COL023) is proposing significant offsite green infrastructure (comprising a series of LAA sites), but these are not shown on the map. Finally, it can be noted that Downs Farm is proposing green infrastructure enhancements to the LAA site located adjacent to the south.

5.5 Reasonable growth scenarios

- 5.5.1 The final step is to **combine sub-area scenarios** to form borough-wide reasonable growth scenarios. Specifically, there is a need to combine the sub-area scenarios above also accounting for supply from: completions since the start of the plan period = 456 homes; commitments as of April 2024 = 600 homes (includes a 10% lapse rate); small sites windfall = 455 homes; and large sites windfall = 407 homes.
- 5.5.2 In total these sources of supply total 1,918 homes, plus across all reasonable growth scenarios a further 1,416 homes supply can be assumed from urban allocations. As such, total supply without Green Belt release is 3,334 homes, which compares to an LHN figure of 10,242 homes, as discussed in Section 5.2.
- 5.5.3 The first port of call is the lower growth scenario across all sub-areas, such that total supply would be 3,564 homes (and, in turn, unmet housing need would be in the region of 7,000 homes). There is a clear case for ruling this scenario out as unreasonable, such that attention can instead focus elsewhere. However, it is understood that there is a strong desire amongst local residents and politicians to minimise Green Belt release and so, on balance, this is reasonable **growth scenario 1**.
- 5.5.4 The next port of call is then support for scenario 1 for the west sub-area with support for the lowest growth scenario elsewhere. This is because Hook Road Arena is considered to be a strongly performing site overall. Total supply would be 3,664 homes and this is **reasonable growth scenario 2**.
- 5.5.5 The next three scenarios, *in ascending order of total quantum*, are as follows: **growth scenario 3** = scenario 2 for the west sub-area, scenario 2 for the south sub-area and scenario 1 elsewhere, leading to a total supply of 3,974 homes; **growth scenario 4** = scenario 2 for the west sub-area, scenario 2 for the east sub-area and scenario 1 elsewhere, leading to a total supply of 4,339 homes; **growth scenario 5** = scenario 3 for the west sub-area and scenario 1 elsewhere, leading to a total supply of 4,914 homes.
- 5.5.6 Next, there is a scenario that is essentially a combination of the three scenarios listed above, i.e. scenario 3 for west sub-area, scenario 2 for the south and east sub-areas and scenario 1 for the northeast sub-area. This is reasonable **growth scenario 6**, and total supply would be 5,899 homes.
- 5.5.7 Finally, there are higher growth scenarios involving support for the most challenging sites progressed to the RA growth scenarios, namely HOR007 / HOR002 (with the sites known as Noble Park Extension and Hollywood Lodge respectively) in the west sub-area; and Land adjacent to Ewell East Station in the northeast sub-area. In order to minimise the number of scenarios it is considered appropriate to assume that there would be support for both sites, leading to **reasonable growth scenario 7**. Under this scenario total supply would be 6,399 homes (such that unmet need would be approaching 4,000 homes).

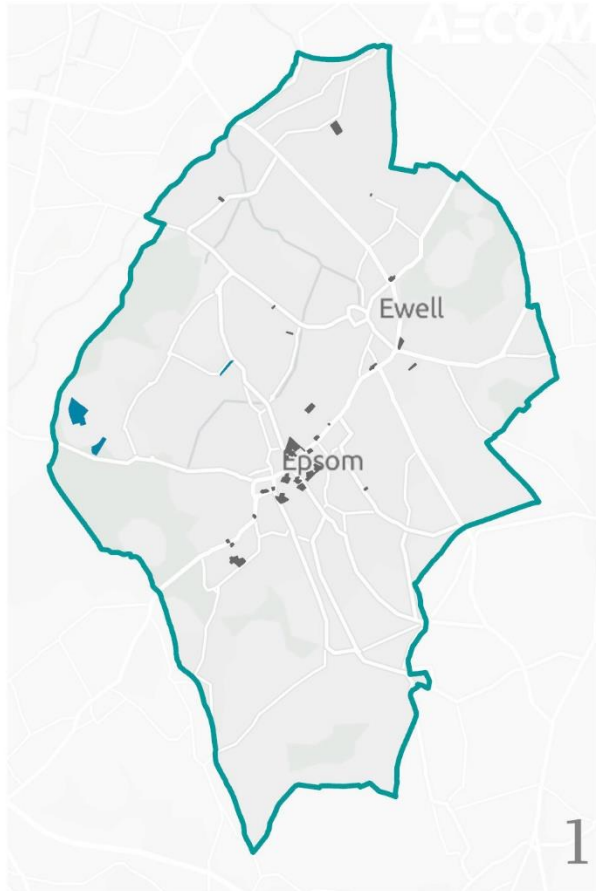
Table 5.2: The reasonable alternative growth scenarios (with constant supply components greyed-out)

Sub area	Site(s)	1	2	3	4	5	6	7
Completions, permissions and windfall		1,918	1,918	1,918	1,918	1,918	1,918	1,918
Urban area	Non Green Belt	1,416	1,416	1,416	1,416	1,416	1,416	1,416
West	Hospital Green Belt PDL	200	200	200	200	200	200	200
West	Chantilly Way	30	30	30	30	30	30	30
West	Hook Road Arena		100	100	100	100	100	100
South	COL017, COL019, COL023			310			310	310
East	Downs Farm				675		675	675
West	Horton Farm					1,250	1,250	1,250
West	Noble Park ext. / Hollywood L.							150
Northeast	Land adj. Ewell East Station							350
Total housing supply		3,564	3,664	3,974	4,339	4,914	5,899	6,399

Figure 5.9: The seven reasonable alternative (RA) growth scenarios

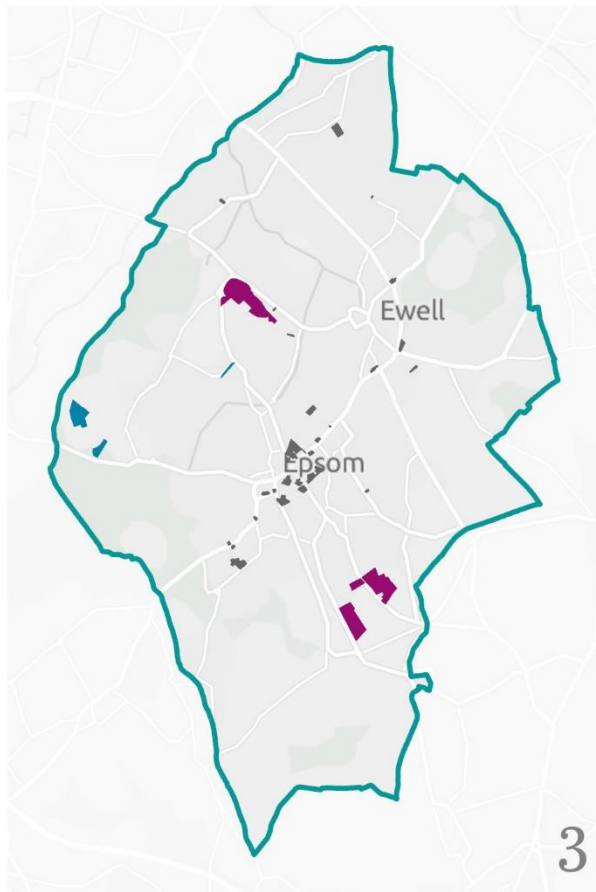
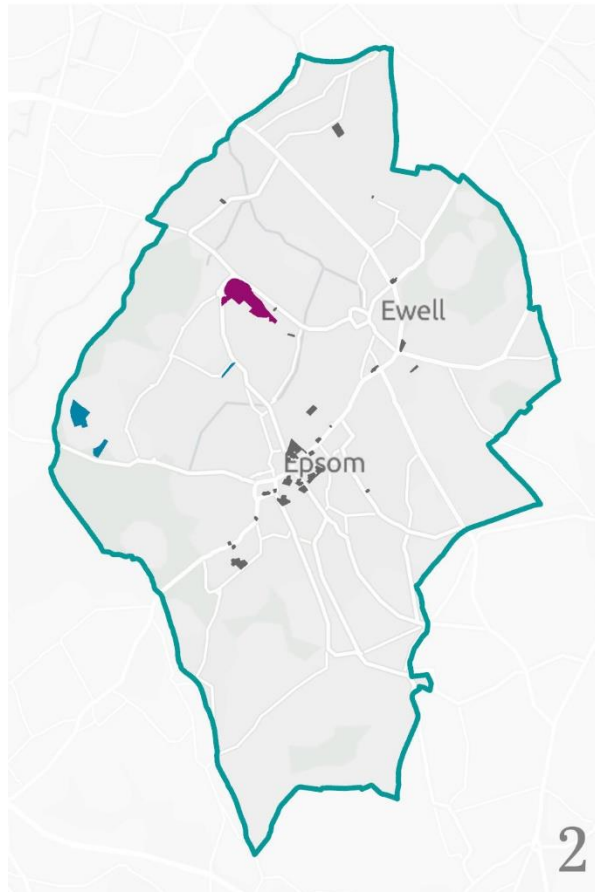
Reasonable Alternative Growth Scenarios

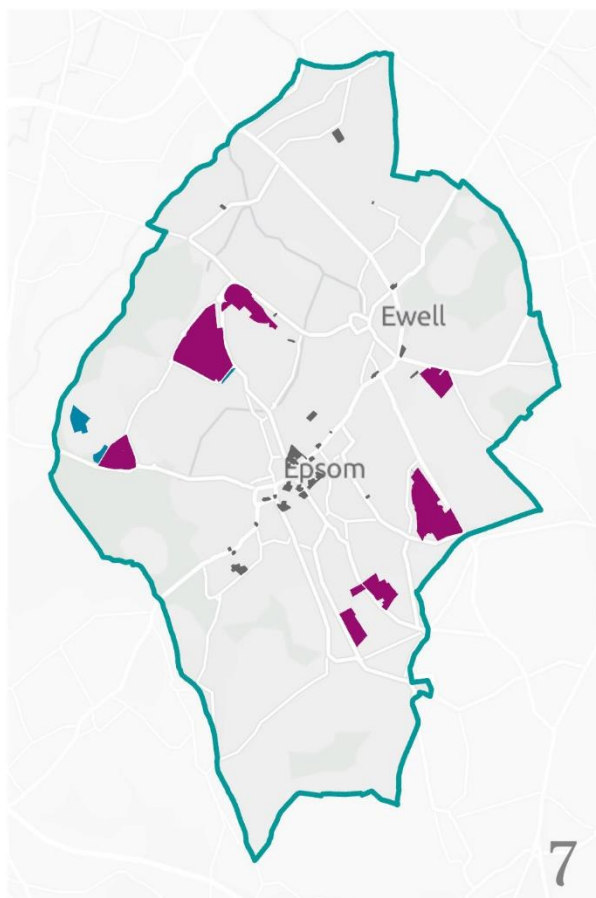
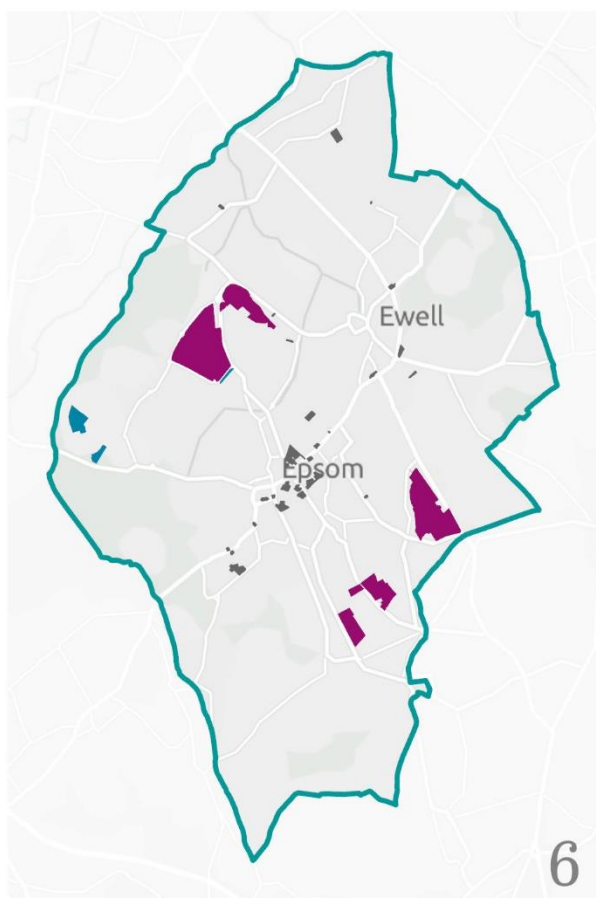
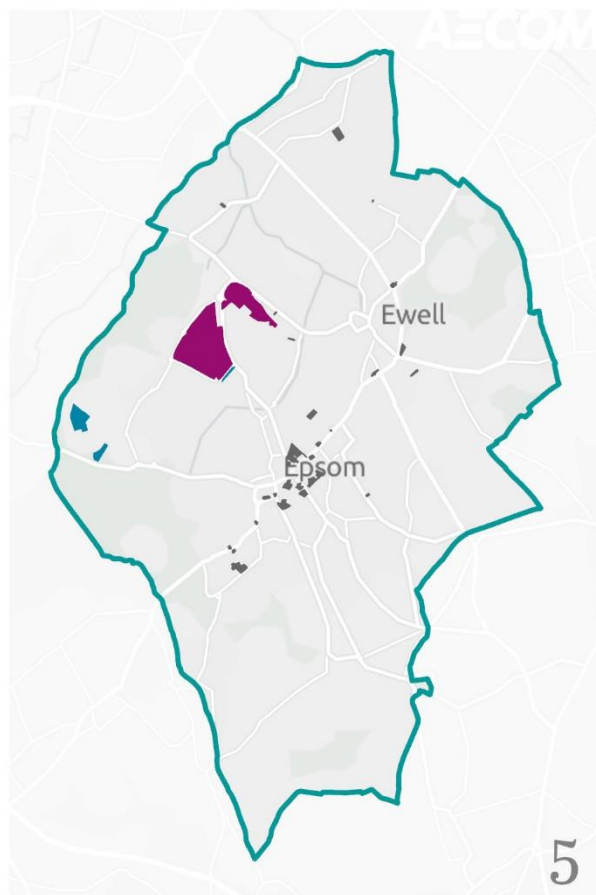
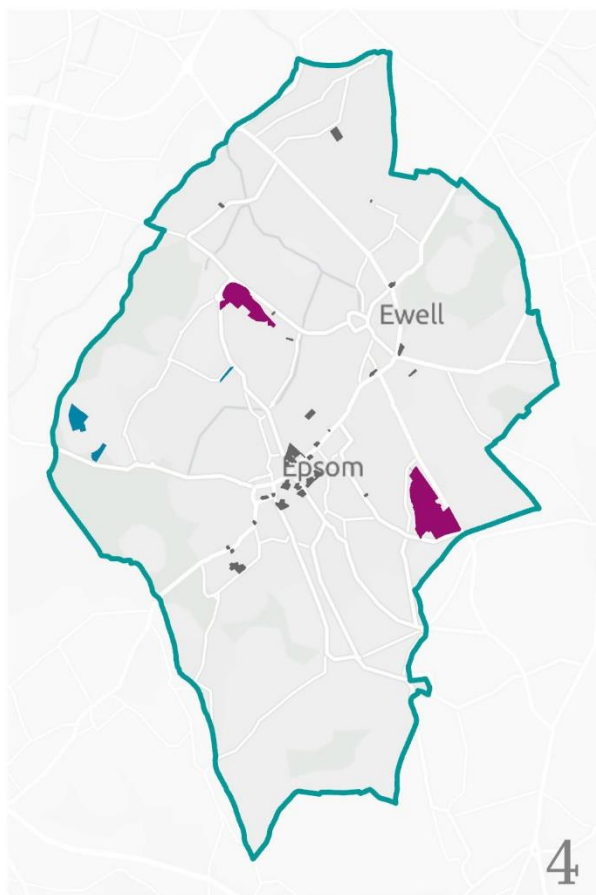
-  Epsom & Ewell
-  Non-Green Belt site
-  Constant Green Belt site
-  Variable Green Belt site



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6 Growth scenarios appraisal

6.1 Introduction

6.1.1 The aim here is to appraise the 7 growth scenarios (Section 5) under each of the 13 topic headings that together comprise the core of the SA framework (Section 3). A final section presents conclusions, including a summary matrix showing an ‘at a glance’ appraisal of the scenarios.

Recapping the growth scenarios

6.1.2 In summary, the reasonable growth scenarios are as follows:

- Scenario 1 – lowest reasonable growth scenario
- Scenario 2 – Scenario 1 plus Hook Road Arena
- Scenario 3 – Scenario 2 plus South Cluster (SC)
- Scenario 4 – Scenario 2 plus Downs Farm (DF)
- Scenario 5 – Scenario 2 plus Horton Farm (HF)
- Scenario 6 – Scenario 2 plus SC, DF and HF
- Scenario 7 – Scenario 6 plus two further sites¹⁵

6.1.3 Horton Farm and Downs Farm are comfortably the largest two sites that feature as a variable across the RA growth scenarios, and, on this basis, the latest site concept plans provided by the site promoters are presented below as Figures 6.1 and 6.2. It should be noted that the concept plan for Horton Farm assumes up to 1,500 homes whilst Officers now view the site is suited to approximately 1,250 homes.

Appraisal methodology

6.1.4 Under each sustainability topic heading the aim is to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of ‘significant effects’ using red / amber / light green / green, where:

- **Red** indicates a significant negative effect
- **Amber** indicates a negative effect of limited or uncertain significance
- **Light green** indicates a positive effect of limited or uncertain significance
- **Green** indicates a significant positive effect
- **No colour** indicates a neutral effect

6.1.5 Further methodological points are as follows:

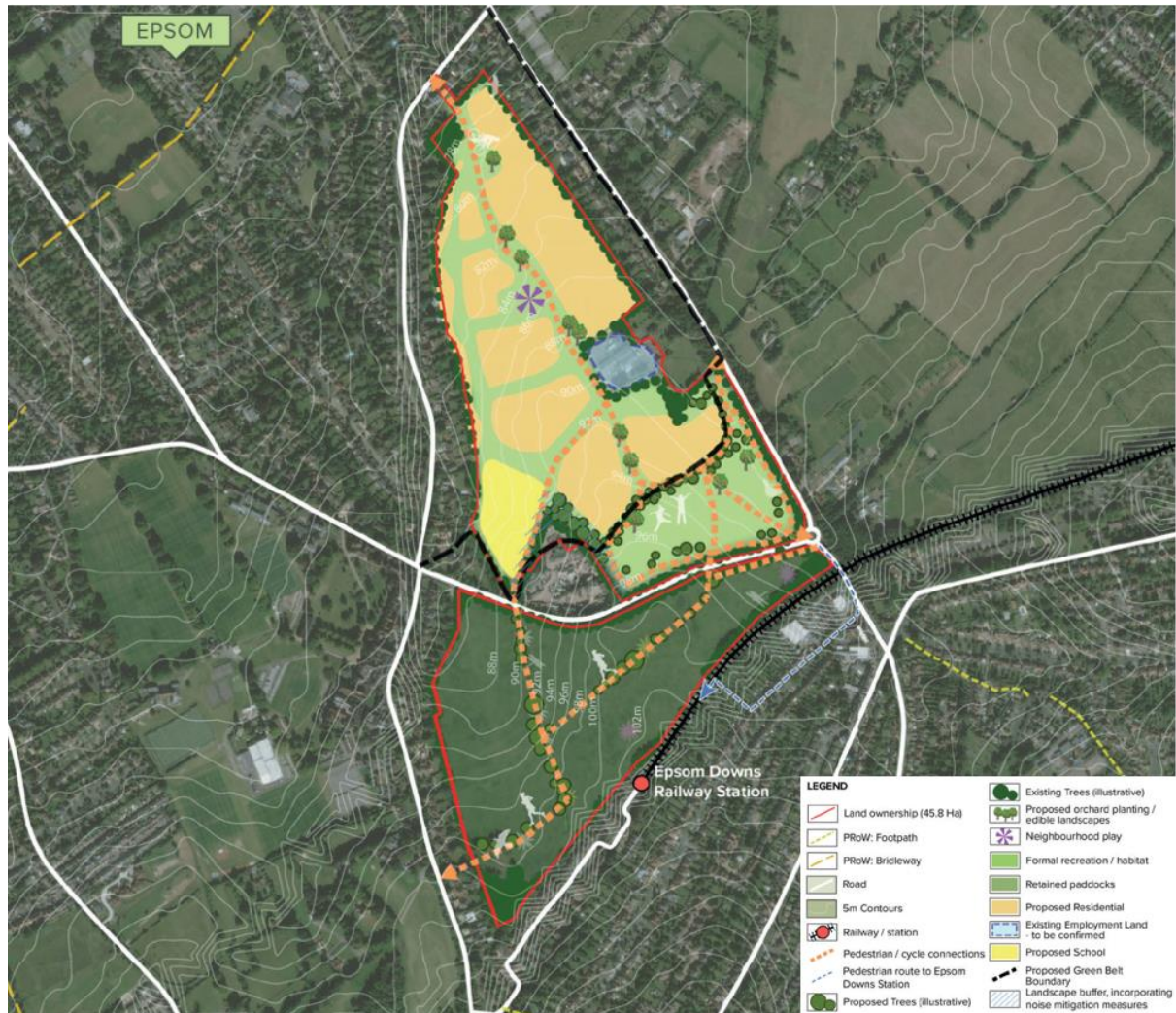
- Constant site allocations – are not a focus of the appraisal below (i.e. the focus is on those site allocation options that are a variable) but feed into conclusions on significant effects. Constant site allocations are then a focus of the appraisal of the Proposed Submission Local Plan as a whole, within Section 9.
- Growth quantum – it is not always appropriate to conclude a preference for lower growth (Scenario 1) from an environmental perspective, despite the fact that housing growth inevitably leads to environmental impacts. That is because lower growth could either result in: unmet housing needs that would have to be provided for elsewhere within a constrained subregion; or issues with adopting the plan such that the Borough is subject to the presumption in favour of sustainable development.
- Assumptions – there is a need to make significant assumptions, e.g. around scheme masterplanning, infrastructure delivery, etc. As part of this, account is taken of materials submitted by site promoters, but it is recognised that any scheme-specific proposals are subject to change. The appraisal aims to strike a balance between a need to explain assumptions and ensure a concise appraisal.

¹⁵ The two further sites that feature under Scenario 7 are HOR007 Noble Park Extension and HOR002 Hollywood Lodge.

Figure 6.1: Site promoter concept plan for Horton Farm (N.B. assumes up to 1,500 homes)



Figure 6.2: Site promoter concept plan for Downs Farm (N.B. reformatted)



6.2 Accessibility

Scenario 1 Low growth	Scenario 2 Scenario 1 + Hook Rd Ar.	Scenario 3 Scenario 2 + S. Cluster	Scenario 4 Scenario 2 + Downs Farm	Scenario 5 Scenario 2 + Horton Farm	Scenario 6 Scenario 2 + SC, DF, HF	Scenario 7 Scenario 6 + two sites
5	4	3	2	1	1	2

6.2.1 A key aim is to highlight opportunities to deliver new and upgraded community infrastructure alongside new homes, ideally in a way that benefits not only new residents but also existing communities ('planning gain'). There is also the potential to take account of accessibility to existing community infrastructure, but this is also a matter that crosses-over with discussions under other headings below, notably 'transport'.

6.2.2 The order of preference reflects the following key factors:

- **Horton Farm** – represents a considerable opportunity, as a larger strategic site. Whilst latest understanding is that there is no requirement for the site to deliver a primary school, discussions remain ongoing (delivering an SEN school is another option) and there should be flexibility to deliver a school if required. Current expectation is that the site will deliver a health facility, although again discussions are ongoing, and it is ultimately for the NHS to determine if this is required. The site is also considered to be well-located from an accessibility perspective in terms of: A) integrating with and complementing recently redeveloped areas within the former hospital cluster; B) accessing the town centre; and C) accessing neighbourhood retail areas. From Figure 6.1 (above) it is evident that the site is well-linked, but also that little space within the site is given over to community infrastructure (but discussions have been ongoing since this concept plan was prepared, with the concept plan assuming up to 1,500 homes).
- **Hook Road Arena** – is well-linked to the B2200/B284, which is something of a strategic corridor, plus the site would deliver a major new sports hub.
- **Downs Farm** – the situation is broadly unchanged from 2023, when the Interim SA (ISA) Report stated: *"the current proposal is to provide land for a primary school, which is supported given the scale of proposed growth; however, there is no evidence to suggest that a new primary school is needed..."* The consultation response received from the site promoters in 2023 stated that if a school is not required then they would be pleased to work with the Council to explore other community infrastructure options.
- **Southeast cluster** – the western-most site in the cluster, which is assumed to be the largest of the three (see discussion in Section 5.4), would deliver a large (strategic) new area of accessible greenspace, which is strongly supported, as the potential to benefit nearby communities in the south of Epsom can certainly be envisaged. However, these sites are otherwise not associated with any significant opportunities for delivering new/upgraded community infrastructure and are in a less accessible location.
- **Scenario 7 sites** – a scheme adjacent to Ewell East Station would be well-placed to deliver a small retail facility or parade of shops, plus this is a highly accessible location. There is no clear community infrastructure opportunity associated with Noble Park Extension / Hollywood Lodge, but the town centre is in relative proximity, and this area benefits from access to Epsom Common and Horton Country Park.
- **Growth quantum** – generating unmet need is not supported, as there can be no certainty that this would be provided for elsewhere in a way that performs well in terms of accessibility objectives. Similarly, a low growth scenario could create issues for the progression of the plan, such that the Borough is at risk of sub-optimal growth (e.g. piecemeal growth in the Green Belt, or growth in the town centre that does not fully align with the masterplan) under the presumption in favour of sustainable development. There is a clear case for realising opportunities to deliver community infrastructure benefits alongside housing growth, and several of the variable sites discussed above have merit in this regard.

6.2.3 With regards to significant effects, opportunities of some note would be realised under Scenarios 2 to 6 over-and-above Scenario 1, but these are of limited significance. In particular, on the basis of current evidence there is not a clear need to deliver a new school to address an existing capacity issue (unlike with many other local plans), although this is subject to change, because the nature of school places forecasting is such that modelling can give notably different results from one year to the next. Under Scenario 1 it is recognised that there would still be a well-targeted approach to growth in the urban area, and in the town centre in particular, but opportunities would go missed and there would or could be issues as a result of the unmet need generated and/or the Borough being subject to the presumption in favour.

6.3 Air quality

Scenario 1 Low growth	Scenario 2 Scenario 1 + Hook Rd Ar.	Scenario 3 Scenario 2 + S. Cluster	Scenario 4 Scenario 2 + Downs Farm	Scenario 5 Scenario 2 + Horton Farm	Scenario 6 Scenario 2 + SC, DF, HF	Scenario 7 Scenario 6 + two sites
3	2	2	★1	★1	★1	★1

6.3.1 Air quality is not a major issue locally, with just one designated air quality management area (AQMA), which is within Ewell (such that it is relatively distant from most of the Green Belt site options that are the primary variable across the growth scenarios). However, [Figure 2.2](#) of the Scoping Report does show another dataset that indicates lower air quality in suburban East Surrey relative to more rural West Surrey.

6.3.2 The order of preference reflects the following key factors:

- **Growth quantum** – there is a clear transport argument to be made against generating unmet housing need, as discussed further below under the ‘transport’ heading. Also, some towns in the sub-region that might feasibly be a focus for unmet need are notably constrained in air quality terms.
- **Southeast cluster** – this part of the Borough’s urban edge performs relatively poorly in terms of accessibility and ‘sustainable transport’ connectivity, with potential air quality implications.
- **Scenario 7 sites** – Land adj. Ewell East Station is 670 metres southeast of Ewell AQMA; however, as the site is located adjacent to Ewell East railway station, there should be the potential to deliver a low car development, which would minimise concerns regarding traffic through the AQMA.

6.3.3 Two further considerations are: A) noise pollution can be another issue, but it is not clear that any of the potential growth locations are significantly constrained in this respect; and B) there is a primary school adjacent to Horton Farm, which is a ‘sensitive receptor’ in terms of air quality and environmental health.

6.3.4 With regards to significant effects, there are no significant concerns under any of the growth scenarios, including accounting for the improving situation nationally resulting from the ongoing switch-over to electric vehicles (albeit EVs generate particulates pollution). The Epsom Town Centre Masterplan does include a focus on air quality (by reducing car dominance, which is discussed as a trend over recent years/decades), but there are no clear ‘significant’ opportunities, and whilst some of the urban allocations are closely associated with a busy road, there will be good opportunity to address concerns through design measures.

6.4 Biodiversity

Scenario 1 Low growth	Scenario 2 Scenario 1 + Hook Rd Ar.	Scenario 3 Scenario 2 + S. Cluster	Scenario 4 Scenario 2 + Downs Farm	Scenario 5 Scenario 2 + Horton Farm	Scenario 6 Scenario 2 + SC, DF, HF	Scenario 7 Scenario 6 + two sites
3	2	2	★1	★1	★1	3

6.4.1 A high proportion of the Borough’s Green Belt is at least of local importance for biodiversity (i.e. designated as an SNCI), and nationally important Epsom Common SSSI is a key constraint.

6.4.2 The order of preference reflects the following key factors:

- **Growth quantum** – unmet need from East Surrey is problematic for biodiversity, given a high level of constraint affecting West Surrey, including the internationally important Thames Basin Heaths Special Protection Area (SPA), around which there is a 400m zone where there is no potential for new homes and a 5-7km zone (depending on scheme size) within which there are strict requirements for new homes to come forward alongside costly mitigation including Suitable Alternative Natural Greenspace (SANG).
- **Scenario 7 sites** – Land adj. Ewell East Station links very closely to Priest Hill SNCI. However, there is little reason to suggest that development would lead to major issues. Problematic recreational pressure is potentially the ‘impact pathway’ of greatest concern, but Priest Hill is managed as a nature reserve by Surrey Wildlife Trust (who may wish to comment through the consultation).

More significant is the biodiversity constraint affecting Noble Park Extension / Hollywood Lodge, as these sites are adjacent to Epsom Common SSSI, there is significant onsite habitat and the land potentially performs a strategic green corridor role, as discussed in Section 5.4.

- **South cluster** – as discussed in Section 5.4, the promoter of the western-most site is clear about biodiversity impacts but presents a strategy for mitigating this with a view to an overall biodiversity net gain. In particular, as well as onsite green infrastructure, the proposal is to deliver a nearby 28 ha area of land as accessible greenspace in perpetuity, with the land also a focus of extensive habitat creation including with a focus on chalk grassland. However, proposals would need to be scrutinised in detail, and at this stage it is appropriate to flag a degree of risk, in line with the mitigation hierarchy (i.e. a need to avoid impacts as far as possible ahead of relying on mitigation and compensation).
- **Hook Road Arena, Downs Farm and Horton Farm** – are all overall subject to limited biodiversity constraint, and the potential for all to deliver targeted onsite biodiversity gains can be envisaged. Hook Road Arena and Horton Farm are in proximity to Horton Country Park SNCI (plus the cemetery adjacent to Horton Farm is an SCNI), but there is a helpful degree of alignment between: A) parts of the site that would or could need to be left undeveloped on account of surface water flood risk; and B) parts of the site where there is some onsite or adjacent non-designated habitat that should be protected and potentially enhanced. The potential for all of these sites to deliver a suitable level of biodiversity net gain can be envisaged (likely 20%, i.e. a level of gain above the legal minimum of 10%), but it has not been possible to confirm precisely how, including in terms of the balance between onsite and offsite gains.

The two figures below have been provided by the Downs Farm site promoter and serve to effectively highlight key biodiversity issues and opportunities across the Borough (albeit they perhaps under represent the importance of the Horton Country Park SNCI area). Amongst other things, they serve to highlight the green infrastructure function of the southern part of the Downs Farm site and also Green Belt parcel 35 (see Figure 5.4, above), which is adjacent to the south and discussed further below. It is important to note that both Downs Farm and GB parcel 35 fall within the 'North Downs; Epsom Downs' Biodiversity Opportunity Area (BOA), as do the 'southern cluster' sites (see map [here](#)). If development of Downs Farm could enhance green infrastructure links between Epsom Downs and Banstead Common then this could be considered a key benefit, but it is not entirely clear that it would have this effect, including because development of Downs Farm could lead to increased pressure for future development within adjacent Green Belt parcel 35. The possibility of creating / restoring chalk grassland at Downs Farm and within adjacent Green Belt parcel 35 is potentially a consideration, noting what has been achieved at nearby Priest Hill Nature Reserve, and also noting proposals in the south cluster.

- 6.4.3 With regards to significant effects, there is a clear basis for flagging a concern with the lowest and highest growth scenarios, although it is recognised that no particular concerns with equivalent scenarios defined, appraised and consulted upon in 2023 were raised through the consultation.

Figure 6.3: Figures provide by the Downs Farm site promoter



6.5 Climate change adaptation

Scenario 1 Low growth	Scenario 2 Scenario 1 + Hook Rd Ar.	Scenario 3 Scenario 2 + S. Cluster	Scenario 4 Scenario 2 + Downs Farm	Scenario 5 Scenario 2 + Horton Farm	Scenario 6 Scenario 2 + SC, DF, HF	Scenario 7 Scenario 6 + two sites
★ 1	★ 1	★ 1	★ 1	2	★ 1	★ 1

6.5.1 A key consideration for local plans is invariably flood risk, although there are also a range of other climate change adaptation / resilience considerations, including overheating risk. This is an issue of concern locally, and a Strategic Flood Risk Assessment (SFRA) has now been prepared (Levels 1 and 2).

6.5.2 Most of the variable site options are not subject to significant fluvial, surface water or ground water flood risk, but there are two key sites of note:

- **Horton Farm** – does include a significant area of surface water flood risk, but this is localised within the site, and there is likely potential to avoid built form in the flood risk area (i.e. integrate the flood risk area as part of a green/blue infrastructure strategy) and deliver high quality Sustainable Drainage Systems (SuDS). The concept masterplan remains open for discussion, but a recent submission from the site promoter is shown above (Figure 6.1) part of the site subject to surface water flood risk left undeveloped. There is a slight tension in that the leaving the lower part of the site subject to a degree of surface water flood risk undeveloped leads to a need to focus development on the more raised parts of the site (in terms of landscape/visual impacts), but this is not thought to be a significant concern, and it is equally the case that the part of the site subject to flood risk is furthest from the town centre and adjacent to an SNCI (a cemetery). Another consideration is a significant surface water flood risk channel associated with Horton Lane, along the northern edge of the site, but again it is not clear that this is a significant concern. The Environment Agency did not make any comment through the consultation in 2023 (stating only that: *“We welcome that none of the proposed allocated sites are located within Flood Zone 2 or 3. This is in line with taking a sequential approach to site selection...”*) and the SFRA Level 2 concludes as follows: *“Development should be directed away from the northern parts of the site where there is higher risk of surface water flooding... Safe access and egress routes should be directed to the north east of the site out of Hollywood Park via Hook Road (B284)... Egress should not be directed towards the north west of the park or towards Hornton Lane as there is significant flood risk in this area.”*

- **Hook Road Arena** – there is a modest area of surface water flood risk within the southeast part of the site, which is where housing growth is proposed to be focused. However, should further work determine a need to avoid housing growth in this area it seems unlikely that there would be any significant considerations for site masterplanning (feasibly the number of homes that the site delivers could be modestly reduced, recalling that this is a council owned site such that there would be few concerns regarding this calling into question site deliverability). The SFRA Level 2 concludes:

“Development should be directed away from the southern and eastern areas of the site where there is higher risk of surface water flooding.”

6.5.3 In respect of both Horton Farm and Hook Road Arena, it is important to be clear that the proportion of each site intersecting a surface water flood risk zone is not particularly high in the national context, i.e. it is often the case that sites are supported through local plans with a higher level of intersect. Specifically:

- Horton Farm – high risk zone = 0.79%; medium risk zone = 2.56%; low risk zone = 13.03%
- Hook Road Arena – high risk zone = 0.14%; medium risk zone = 1.64%; low risk zone = 10.2%

6.5.4 On this basis, it is quite difficult to confidently differentiate between the growth scenarios. The approach taken aims to reflect the constraint affecting Horton Farm whilst also indicating support for directing growth to locations with low flood risk. It is not considered appropriate to flag Scenario 1 as preferable to higher growth scenarios simply on account of modest surface water flood risk at Hook Road Arena.

6.5.5 With regards to significant effects, there are no significant concerns, in line with the consultation response received from the Environment Agency in 2023. With regards to the sites that are held constant across the growth scenarios (urban sites, two Green Belt PDL sites and Chantilly Way), none intersect a fluvial flood risk zone, although several do intersect a surface water flood zone (including Chantilly Way), as discussed further below (Section 9).

6.6 Climate change mitigation

Scenario 1 Low growth	Scenario 2 Scenario 1 + Hook Rd Ar.	Scenario 3 Scenario 2 + S. Cluster	Scenario 4 Scenario 2 + Downs Farm	Scenario 5 Scenario 2 + Horton Farm	Scenario 6 Scenario 2 + SC, DF, HF	Scenario 7 Scenario 6 + two sites
2	1	1	1	1	1	1

- 6.6.1 Focusing on built environment decarbonisation (with transport discussed below), the equivalent appraisal in 2023 discussed support for strategic sites, which can be well-suited to delivering net zero development to an exacting standard (meaning delivered in line with the energy hierarchy, and ideally without resort to offsetting, and also potentially with an ‘energy based’ approach to calculating and communicating emissions; see further discussion in Section 8). However, at this stage it is not possible to say with any certainty that any of the variable site options perform any better or worse in this regard (i.e. have greater or lesser potential to deliver net zero development to an exacting standard). The consultation response received from the Horton Farm site promoters in 2023 makes the briefest of references to “net zero homes” (also, it seeks to emphasise that the landowner – namely the Church Commissioners for England – aim to “lead by example”), but there remains uncertainty ahead of further work (e.g. the consultation response assumes up to 1,500 homes, whilst latest understanding is that the site would deliver ~1,250 homes).
- 6.6.2 What it is possible to flag though is a built environment decarbonisation case for minimising unmet housing need, because the Borough benefits from strong development viability, such that there is relatively good potential to deliver net zero development alongside delivering on wider policy asks, e.g. affordable housing. Also, unmet need is considered highly problematic in terms of transport emissions, and the Borough is known to have the lowest number of cars per household of any of the Surrey local authorities.
- 6.6.3 With regards to significant effects, it is appropriate to question whether any of the scenarios reflect the necessary level of ambition in respect of ensuring that built environment decarbonisation opportunities are fully realised, in the context of ambitious national and local decarbonisation targets. Much depends on development management policy, but steps must still be taken through spatial strategy and site selection.

6.7 Communities

Scenario 1 Low growth	Scenario 2 Scenario 1 + Hook Rd Ar.	Scenario 3 Scenario 2 + S. Cluster	Scenario 4 Scenario 2 + Downs Farm	Scenario 5 Scenario 2 + Horton Farm	Scenario 6 Scenario 2 + SC, DF, HF	Scenario 7 Scenario 6 + two sites
2	1	1	2	2	3	3

- 6.7.1 The discussion under this heading is an opportunity to discuss matters over-and-above the key matter of accessibility to community infrastructure, which is a focus of discussion above.

- 6.7.2 The order of preference reflects the following key factors:

- **Higher growth scenarios** – whilst the equivalent appraisal in 2023 was ultimately unable to differentiate between the growth scenarios with any certainty, at this stage it is considered appropriate to flag a concern with the higher growth scenarios. This is on the basis of local concerns with housing growth, as understood from the consultation in 2023, and in the context of a densely developed Borough associated with sensitive green gaps between settlements. Also, the reality is that a high growth scenario would generate very significant levels of local opposition with the implication that the plan would struggle to progress, leaving the Borough at risk of planning applications being considered under the presumption in favour of sustainable development, and the Borough also potentially being at risk from Government intervention (which is to be avoided, if at all possible, from a ‘communities’ perspective).

Also, one of the sites assumed to deliver additional growth under Scenario 7 is Land adjacent to Ewell East Station, where there is a concern regarding loss of sports pitches (albeit there may be the potential to relocate these very effectively at a new sports hub located less than 2.5km distant).

With regards to the other additional site(s) assumed under Scenario 7, namely Noble Park Extension / Hollywood Lodge, Epsom Common, see discussion above under ‘Accessibility’.

- **South Cluster** – the potential to deliver a significant new area of strategic greenspace has already been discussed above, but warrants being given particular weight under this current topic heading. In wider respects, the three sites assumed to deliver homes as part of the ‘south cluster’ are all quite modest in size, and it could be that they generate relatively few concerns from the nearby communities (although it is important to recall that the eastern-most site, whilst assumed here to deliver ~100 homes, has been promoted for a considerably larger scheme, which would likely generate significant community concern).
- **Horton Farm and Hook Road Arena** – there is a general opportunity to contribute to place-making to the northwest and west of Epsom, which is where recent housing growth has been focused, through the redevelopment of the former hospital sites. Hook Road Arena will deliver a new sports hub and, whilst further work is needed to confirm what Horton Farm will deliver and ‘bring’ to the local area, there can be confidence of a high-quality development that achieves ‘planning gain’, and masterplanning could be a focus of Council efforts with a view to maximising benefits, including in terms of high quality design, drawing upon the recent experience to Epsom Town Centre Masterplan. As part of this, there will be a need to deliver strategic green infrastructure and, related to this, it is expected that the scheme will be comprehensive in the sense of ‘completing’ the expansion of Epsom in this direction (as far as Horton Country Park, which would be highly accessible to new residents). Hook Road Arena would be well placed to deliver strategic green infrastructure as an integrated part of the sports hub, and the current proposal at Horton Farm is to deliver an approximately 7ha public park at the northern extent of the site, in addition to wider green infrastructure interwoven throughout. A final consideration, in respect of these two sites, is that this part of the Borough is associated with a degree of relative deprivation, at least in comparison to the rest of the Borough (which is overall affluent; see [Figure 6.1](#) in the SR).

The above discussion is broadly similar to the equivalent section of the ISA Report (2023). However, at this stage it is also appropriate to recognise a further factor, which is the significant level of objection to both sites, as understood from the consultation in 2023 (both were proposed allocations).

- **Downs Farm** – it is more difficult to confidently predict that development delivering significant benefits to the local community, and there is every likelihood that a proposal to allocate this site would generate a significant level of objection, perhaps on a par with that seen for Horton Farm and Hook Road Arena. It is noted that the scheme could deliver some improved footpath connectivity in this part of the Borough, where existing connectivity is limited, but it is not clear that benefits would be significant e.g. in light of an aspiration to improve footpath linkages between Epsom Downs and Banstead Downs.

6.7.3 With regards to significant effects, there is also a need to factor-in the site allocations that are a constant across the scenarios, most notably sites in the town centre that will deliver on the Town Centre Masterplan.

6.8 Economy and employment

Scenario 1 Low growth	Scenario 2 Scenario 1 + Hook Rd Ar.	Scenario 3 Scenario 2 + S. Cluster	Scenario 4 Scenario 2 + Downs Farm	Scenario 5 Scenario 2 + Horton Farm	Scenario 6 Scenario 2 + SC, DF, HF	Scenario 7 Scenario 6 + two sites
7	6	5	4	3	2	1

6.8.1 From Figures 6.1 and 6.2 above it can be seen that both Horton Farm and Downs Farm include existing farm buildings, and at both sites there is good potential to retain and enhance some of the buildings for employment use (the former farmhouse at Downs Farm is already used for offices). However, benefits would be modest, and there would likely be some loss of existing employment uses onsite (there is a warehousing and distribution business at Downs Farm). At Horton Farm, as a larger site, opportunities should continue to be explored, in line with the following statement from the Interim SA Report (2023): “...a mixed use community hub... is something that might typically be expected for a scheme of this scale.” Since 2023 it has now been established that the site can at least provide some business incubation space.

6.8.2 Overall, employment land benefits do not vary significantly across the scenarios, hence the primary consideration here is the need to deliver new homes in order to support the local economy, recognising the needs of businesses in terms of access to a suitably skilled local workforce. A lack of family and affordable housing can be a major issue for the effective functioning of local economies. With regards to significant effects, under all scenarios there is the potential to ensure an employment land supply in line with the needs set out in the HEDNA (2023; as discussed in Section 5.2), but following a low housing growth strategy would not amount to a suitably positive approach to supporting the local economy.

6.9 Historic environment

Scenario 1 Low growth	Scenario 2 Scenario 1 + Hook Rd Ar.	Scenario 3 Scenario 2 + S. Cluster	Scenario 4 Scenario 2 + Downs Farm	Scenario 5 Scenario 2 + Horton Farm	Scenario 6 Scenario 2 + SC, DF, HF	Scenario 7 Scenario 6 + two sites
2	★1	★1	★1	★1	★1	3

6.9.1 The order of preference reflects the following key factors:

- **Scenario 7 sites** – Land adj. Ewell East Station is subject to limited historic environment constraint, but this is not the case for the other site(s) assumed to deliver additional growth under this scenario, namely Noble Park Extension / Hollywood Lodge, as discussed in Section 5.4.
- **Downs Farm** – is adjacent to a conservation area associated with an early C20th housing estate, and land within the site does rise away from the conservation area; however, the proposed greenspace could mitigate any visual impacts. The site promoter has submitted information suggesting that impacts can be suitably avoided and mitigated, but a degree of residual concern remains.
- **Horton Farm** – relates closely to *three* components of the Hospitals Cluster Conservation Area (see Figure 6.1), and one of the components (Horton Farm) is on the national Heritage at Risk Register. Also, there is a listed farmhouse onsite that is a three-storey building visible from Chantilly Way. However, a small landscape buffer is proposed, and the potential to protect and possibly enhance the setting of the farmhouse might be envisaged, and it is not clear that the site as a whole contributes significantly to appreciation of the conservation area (as a whole). There could well be the potential for sympathetic development to complete the ‘story’ of reimagining the historic hospitals cluster, and the following from the Interim SA Report (2023) is of note: *“Much depends on the scale of growth (possibly <1,500 homes) and the detailed approach that is taken to masterplanning and design, and there would be a clear need to work closely with Historic England.”* The latest situation is that: A) the site capacity has been reduced to 1,250 homes; and B) Historic England did not raise any concerns through the consultation in 2023.
- **South Cluster** – these sites are subject to limited historic environment constraint. In particular, this is the case for the two smaller sites to the east, although this is on the assumption of a modest / well-contained scheme at the eastern-most site; if the site were to be delivered to the extent envisaged by the site promoter then there would be a risk of enveloping South Hatch (see [historic mapping](#)), which has a degree of historic character and a value position between Epsom and Epsom Downs. The final site in this cluster is then located a short distance to the west, and a constraint is adjacent Epsom Cemetery (shown on historic mapping). The site does contribute to the setting of the cemetery.


Another factor is protecting the relationship between historic Epsom Downs Racecourse and Epsom, including accounting for a historic Rifle Butts Alley, which passes through the centre of the cluster.

- **Hook Road Arena** – is notably unconstrained in terms of the historic environment (at least in terms of designated assets/areas; another consideration is archaeology, but this is typically a matter that can be dealt with effectively through development management, e.g. requiring excavation and recording).

6.9.2 In conclusion, as well as a clear concern with the highest growth scenario, there is also not support for the lowest growth scenario, as it would represent a missed opportunity to direct homes to a site subject to low constraint, and unmet need could lead to pressure for housing growth in sensitive locations elsewhere. It is then not possible to differentiate between the remaining scenarios with any certainty (the views of Historic England would be welcomed). Whilst in 2023 Horton Farm was flagged as a preferable site to Downs Farm (including account for the scale of the site, i.e. as a larger site support for Horton Farm would serve to reduce pressure for growth elsewhere in a constrained Borough and sub-region), this was a marginal judgement. Whilst there is good potential for a sensitive development at Horton Farm that respects and potentially complements the historic value of the hospitals cluster, this is somewhat subjective and uncertain ahead of further detailed work and comments received from Historic England, and there is a need to recall that Horton Farm has generated significant levels of local concern.

6.9.3 With regards to significant effects, on balance a neutral effect is predicted for Scenario 7, but this is marginal (i.e. there is a case for flagging a ‘moderate or uncertain negative effect’). N.B. this conclusion is reached taking into account sites that are held constant across the scenarios, of which several are subject to a degree of historic environment constraint (see discussion in Section 9).

6.10 Housing

Scenario 1 Low growth	Scenario 2 Scenario 1 + Hook Rd Ar.	Scenario 3 Scenario 2 + S. Cluster	Scenario 4 Scenario 2 + Downs Farm	Scenario 5 Scenario 2 + Horton Farm	Scenario 6 Scenario 2 + SC, DF, HF	Scenario 7 Scenario 6 + two sites
7	6	5	4	3	2	1 

- 6.10.1 There is a clear need to rank the scenarios in order of growth quantum and to predict significant negative effects under all scenarios because of the unmet housing need generated (see discussion in Section 5.5). As part of this, the Borough would continue to deliver affordable housing at a very low rate (see discussion in Section 5.2) given the current reliance on market-led housing schemes to deliver affordable housing.
- 6.10.2 Other considerations relate to supporting larger sites suited to delivering a good mix of homes, to include family homes and the full policy quota of affordable housing, and potentially to include self-build plots (a means of enabling households to meet their housing needs) and specialist housing. However, on the other hand, there is support for smaller sites able to deliver in the key early part of the plan period (given potential to boost supply for latter years through future Local Plans). Small sites also tend to benefit from low delivery risk (although it also be noted that two of the smaller sites that feature across the scenarios are assumed to deliver fewer homes than they are being promoted for, which leads to a delivery risk).
- 6.10.3 A final crucially important consideration is providing for Gypsy and Traveller accommodation needs, with it being the case that the Borough would generate significant unmet need without Horton Farm. Every effort must be made to meet accommodation needs, as poor accommodation can be a barrier to maintaining the traditional way of life, can lead to tensions with settled communities and contributes to acute issues of relative deprivation, with Travellers on average having very poor outcomes across health, education and other indicators, as discussed [here](#). A recent [blog](#) prepared on behalf of the RTPI explained how failing to provide for Gypsy and Traveller accommodation needs in full is all too common.

6.11 Land, soils and resources

Scenario 1 Low growth	Scenario 2 Scenario 1 + Hook Rd Ar.	Scenario 3 Scenario 2 + S. Cluster	Scenario 4 Scenario 2 + Downs Farm	Scenario 5 Scenario 2 + Horton Farm	Scenario 6 Scenario 2 + SC, DF, HF	Scenario 7 Scenario 6 + two sites
2	1 	1 	1 	1 	1 	1 

- 6.11.1 Horton Farm and Downs Farm are either in productive agricultural use or have the potential to be, whilst the other Green Belt site options in question appear to have less agricultural potential, e.g. more suited to grazing horses or, in the case of Land adj. Ewell East Station, sports pitches.
- 6.11.2 None of the site options in question have been surveyed in detail to ascertain the grade of agricultural land (see the 'post 1988 criteria' dataset available at magic.gov.uk), but the nationally available low resolution/accuracy 'provisional' agricultural land quality dataset shows all agricultural land in the Borough to be either 'grade 3' quality (which may or may not be 'best and most versatile, which the NPPF classes as land that is of grade 1, 2 or 3a quality) or 'grade 4' quality. Specifically, there is a prevalence of grade 4 quality land in the south of the Borough, which could potentially mean that Horton Farm comprises higher quality agricultural land than is the case for Downs Farm; however, there is no certainty in this respect.
- 6.11.3 There are two further considerations. Firstly, with regards to unmet need, it is fair to predict that scenarios involving high levels of unmet need would lead to pressure on productive, and potentially higher grade, agricultural land over-and-above scenarios involving meeting more of Epsom and Ewell's housing need in the Borough. However, this is a fairly marginal consideration, as the national 'provisional' dataset does not show a high prevalence of higher quality (grade 2) quality land across the wider sub-region. There is a concentration of higher quality agricultural land to the west of Epsom (e.g. Spelthorne and Runnymede), but there is little or no potential for unmet need for Epsom and Ewell to be provided for there. Secondly, whilst there do not appear to be any minerals [safeguarding areas](#) intersecting the Borough, there is a 'waste consultation area' associated with a waste transfer site adjacent to Downs Farm (former Epsom Chalk Pit / Lime Works). This is a constraint but has been accounted for in site promoter masterplanning.

6.12 Landscape

Scenario 1 Low growth	Scenario 2 Scenario 1 + Hook Rd Ar.	Scenario 3 Scenario 2 + S. Cluster	Scenario 4 Scenario 2 + Downs Farm	Scenario 5 Scenario 2 + Horton Farm	Scenario 6 Scenario 2 + SC, DF, HF	Scenario 7 Scenario 6 + two sites
2	★ 1	4	3	★ 1	5	5

6.12.1 The order of preference reflects the following key factors:

- **Hook Road Arena** – performs strongly in Green Belt terms, as discussed in Section 5.4, but has low landscape and visual sensitivity (see Figure 6.4). Latest understanding is that the whole site would be removed from the Green Belt (to include the sports hub), but the proposal remains to contain new homes in the southeastern corner of the site, to the south of a mature TPO field boundary (although there could be a risk of impacts to the field boundary).
- **Horton Farm** – is also supported, and it is considered that concentrating new homes here would be a means of delivering new homes in a way that minimises landscape impacts, recognising that the alternative could be a similar number of homes delivered across smaller sites. As discussed in Section 5.4, there are reasons to suggest Green Belt sensitivity is lower than indicated by the Green Belt Review. This is particularly because significant road infrastructure, with Horton Country Park beyond, could be drawn-upon to form a new defensible Green Belt boundary (alongside areas of development currently washed over by the Green Belt but now likely to be inset). A new Green Belt boundary to the northeast would not be quite as strong, as reliance would be placed on a woodland cemetery (with a road beyond), a conservation area (part of the former hospitals cluster) and a riding school for people with disabilities. Finally, to the southwest would be Hobbledown Adventure Farm Park and Zoo (shown quite clearly in Figure 2.1, above), which is considered to be an important community and economic asset (linking to Horton Country Park) such that there is no suggestion of the site coming under pressure for housing.

Finally, the following discussion from the ISA Report (2023) equally applies at the current time:

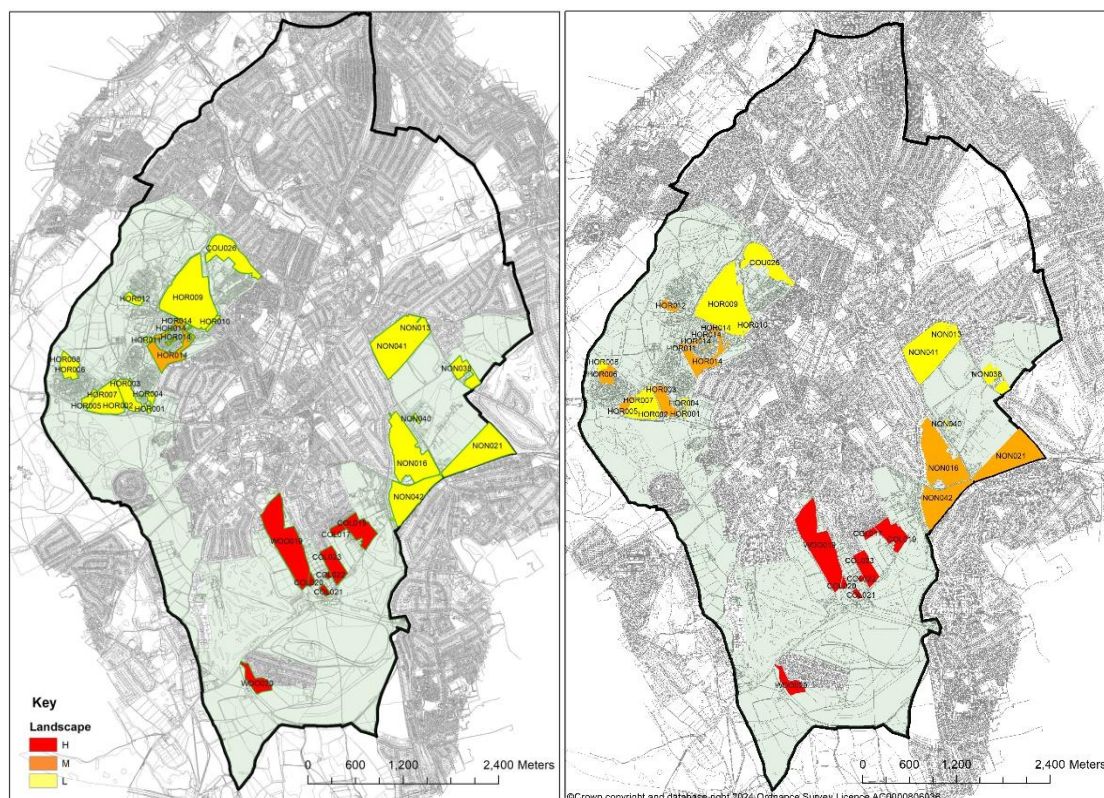
“... this is a historic area of farmland closely associated with the Hospitals Cluster, surrounded by historic roads/lanes on three sides, and with the majority of the historic field boundaries shown on the pre-1914 OS map still present. However, there are no public rights of way intersecting or adjacent to the site (other than footways along the roads), and along the entire perimeter of the site the roads appear to have been widened and otherwise modernised (including with near complete coverage of offroad cycle paths), which likely limits any sense of rurality. There are widespread views into the site from the adjacent roads and associated pedestrian / cycle paths, but these are filtered views through hedgerows (of varying thickness / quality, and with some standard trees) and, whilst the land does rise to the west, it is not clear that there are extensive views into or across the site that are likely to be of particularly high value (this will require further consideration through masterplanning, noting that the current proposal is to focus greenspace on lower land subject to surface water flood risk).”

- **Downs Farm** – the proposal to focus housing in the less sensitive northern part of the site is noted, and it is recognised that the Green Belt Study Update (2024) indicates relatively limited landscape concerns but some concerns regarding topography / elevation where there is some visual sensitivity. However, concerns remain regarding pressure for future development within Green Belt parcel 35, to the south of the site, which would have the effect of closing a key settlement gap, plus this is rising land towards Epsom Downs. This concern was raised in the ISA Report (2023), mindful that the land is in the control of the site promoter, but in response the site promoter argues that this concern is not legitimate.
- **South Cluster** – landscape is a key sensitivity here, as is evident from Figure 6.4, which shows the outcomes of analysis presented in the Green Belt Study Update (2024). Taking the sites in turn:
 - West (COL023) – there are some filtered longer distance views across the site from Downs Road on the approach to Epsom from the direction of Epsom Downs, and there is the context of the adjacent historic cemetery. The Green Belt Review flags this parcel as more sensitive than the two to the east (see Figure 5.4, above), and the settlement edge here is long-established (pre-war, as can be seen from WWII aerial photography available at Google Earth). However, given the clear proposal to deliver the southern part of the site as greenspace, there does appear to be some potential to define a new long term defensible Green Belt boundary, drawing upon an established/historic field boundary.

- Central (COL017) – the landscape and Green Belt sensitivity may be lower than indicated by the two figures below and Figure 5.4 once account is taken of a site under construction adjacent to the south. The settlement edge here is older (pre WWI), but there appears to be a thick hedgerow screening the site from Burgh Heath Road to the east (although there is also a need to account for Rifle Butts Alley to the west) and there is also the context of a small new residential development to the east.
- East (COL019) – a concern is that developing the site to its full extent would risk enveloping South Hatch (shown on historic mapping and with a characteristic location between Epsom and the Downs / Racecourse) and pressure for development creep to the southeast (in filling the gap to Epsom Downs). As such, the assumption is a modest scheme of perhaps 100 homes, although it is recognised that the site promoter might choose not to make the site available for this quantum of growth. The intention is to focus development within the northwestern part of the site most closely related to the urban edge, but there would be a need for considerable greenspace / landscape in order to secure a defensible Green Belt boundary. This part of the site appears to have been previously used for horse training.
- **Scenario 7 sites** – Land adjacent to Ewell East Station is considered to have limited Green Belt and landscape sensitivity, once account is taken of the SNCI to the south and the NEScot playing pitches to the west being protected over the long term. However, the Green Belt Study Update (2024) flags some visual sensitivity and also strikes the following note of caution: *“The site is an awkward shape and may make it vulnerable to further infill of adjacent parcels.”* It is also noted that there is an adjacent historic bridleway. Finally, with regards to Noble Park Extension / Hollywood Lodge, this is a sensitive Green Belt parcel, but there is limited landscape and visual sensitivity. This is an important gap between components of the Hospitals Cluster Conservation Area and between Epsom Common / Horton Country Park, such that there is a clear case for a comprehensive approach to any growth. This should have come through clearly from the work presented in the ISA Report (2023) but the site promoters have not undertaken joint work; indeed the Hollywood Lodge promoter did not respond to the consultation in 2023.
- **Growth quantum** – high growth would lead to in combination effects, given the nature of the Borough (narrow Green Belt gaps), but equally low growth is not supported, given sub-regional constraints.

6.12.2 With regards to significant effects, a key matter is Downs Farm. It remains the case that directing growth here ahead of Horton Farm is not supported from a landscape perspective, but the question is whether to assign an amber rating to Scenario 4. The decision is ‘no’, but this is marginal / uncertain.

Figure 6.4: Landscape (left) and visual (right) appraisal from the Green Belt Study Update (2024)



6.13 Transport

Scenario 1 Low growth	Scenario 2 Scenario 1 + Hook Rd Ar.	Scenario 3 Scenario 2 + S. Cluster	Scenario 4 Scenario 2 + Downs Farm	Scenario 5 Scenario 2 + Horton Farm	Scenario 6 Scenario 2 + SC, DF, HF	Scenario 7 Scenario 6 + two sites
4	3	3	2	1	2	2

6.13.1 This is another key consideration influencing both definition of the RA growth scenarios (see discussion in Section 5) and their appraisal. The order of preference reflects the following key factors:

- **Growth quantum** – generating unmet need is not supported, because there is a clear transport-case for providing for housing need as close as possible to source (i.e. where the housing need arises). Also, unmet need is not conducive to effective strategic transport planning, which requires early and long-term certainty regarding the distribution of housing growth across a sub-region. Having said this, at this advanced stage in the plan-making process it is also fair to strike a note of caution in respect of the higher growth scenarios appraised, in that the County Council has not commented on them (the County Council did not comment on the Interim SA Report, 2023) and they have not been a focus of detailed work to consider traffic / transport implications (or opportunities, e.g. targeted infrastructure upgrades).
- **Scenario 7 sites** – Land adjoining Ewell East Station has excellent train connectivity and also good access to bus services along the A24, whilst the two adjacent sites to the west (Noble Park Extension / Hollywood Lodge) benefit from good proximity to the town centre, and reasonable bus connectivity.
- **Horton Farm** – has reasonable train and bus connectivity, with work having established that there is the potential to divert two bus services into the site, which is encouraging albeit bus services are inherently uncertain, and equivalent work has not been undertaken for all of the other variable sites. There is also very good cycle connectivity, including to existing local centres (there are offroad routes on nearly all sides of the site), very good road access (subject to ongoing work, including noting surface water flood risk), and there is an opportunity to better-connect the somewhat isolated community of Long Grove.
- **Hook Road Arena** also performs well for similar reasons, as discussed.
- **Downs Farm** – performs reasonably well, noting the proposal to deliver a new walking/cycling link to improve connectivity to Epsom Downs Station (although the route is not direct; also, the service options and frequency are not as good as from Epsom (in particular) and Ewell East).
- **South cluster** – these sites perform poorly in transport terms, as has been discussed. However, one point to note is that Epsom to Epsom Downs corridor is a priority for upgrade in the [LCWIP](#) (2024).

6.13.2 With regards to significant effects, it is appropriate to predict a 'moderate or uncertain' negative effect in respect of the lowest growth scenario, which aligns with the conclusion reached in 2023. At this stage it is also considered appropriate to predict a 'moderate or uncertain' positive effect for Scenario 5, recognising that Hook Road Arena and Horton Farm have been a focus of consultation and technical workstreams to explore transport issues and opportunities, and also accounting for town centre growth.

6.14 Water

Scenario 1 Low growth	Scenario 2 Scenario 1 + Hook Rd Ar.	Scenario 3 Scenario 2 + S. Cluster	Scenario 4 Scenario 2 + Downs Farm	Scenario 5 Scenario 2 + Horton Farm	Scenario 6 Scenario 2 + SC, DF, HF	Scenario 7 Scenario 6 + two sites
2	2	1	1	1	2	2

6.14.1 The equivalent appraisal in 2023 stated: "... a key consideration is often capacity at wastewater treatment works (and the environmental capacity of the water courses that receive treated wastewater), but there is currently a lack of evidence... Issues tend to be associated with more rural areas; however, on the other hand, the borough is associated with the headwaters of two river systems (Hogmill and Mole). Also, the chalk aquifer underlying the southern part of the Borough may be a constraint to growth. However, once again, it is also fair to flag a concern with unmet housing need. For example, Crawley and Horsham... must demonstrate water neutrality..."

- 6.14.2 Subsequently the consultation responses received from the Environment Agency and Thames Water raised few if any concerns regarding wastewater treatment.
- 6.14.3 Most recently, there has been further engagement with Thames Water as part of the process of preparing the Infrastructure Delivery Plan (IDP) published as part of the current consultation. Thames Water state:
- “... I’ve consulted with our asset planners for the area in relation to your queries. With regard to Hogsmill STW, no growth upgrades are proposed in AMP8 (from 2025-2030) and while growth is anticipated within the catchment there is not enough growth concentrated within the catchment to require a growth upgrade during AMP8. The proposed growth within Epsom and Ewell and other authorities within the catchment of Hogsmill STW will inform our projections for flows to the works and when growth upgrades may be required. A project is proposed in AMP8 to quadruple storm tank capacity by 2031. This will reduce spills from the STW and would also reduce the effect of new development on discharges from the works. In addition an upgrade is also proposed to the combined heat and power plant at the site.*
- Our adopted Drainage and Wastewater Management Plan can be found [[here](#)] and includes consideration of what actions will be necessary within the Hogsmill catchment over the next 25 years. Growth projected within the borough through the local plan will be taken into account in forecasts to help inform future updates to our DWMP and inform future business plan proposals. Future forecasts will take account of a range of data and information as it is people that use water and produce wastewater and not new buildings, as such forecasts need to take account of factors including local plan figures for housing delivery along with anticipated population growth and observed flows at existing works.”*
- 6.14.4 Overall, there is no clear evidence of wastewater treatment being a significant constraint to growth locally, but it is considered appropriate to flag a concern with scenarios generating major unmet need, as this simply leads to an uncertainty that risks hindering strategic planning for wastewater treatment. Also, it is appropriate to flag a concern with higher growth, recognising that this would involve a strategy that the EA and Thames Water have not reviewed to date.
- 6.14.5 Finally, with regards to water supply / drawing upon water resources (potentially with implications for water levels and, in turn, the water environment), it remains the case at this stage that whilst there are regional and potentially sub-regional concerns (‘water stress’), there is no reason to suggest a particular concern with higher growth in Epsom and Ewell. A discussion of the established regime for water supply planning is presented within the Habitats Regulations Assessment (HRA) Report available at the current time, and the concluding is as follows: *“In summary, water supply issues will be addressed through the higher-level water planning framework and licencing process (RBMP, WRMP, Drought Plans and CAMS).”*

6.15 Appraisal summary

- 6.15.1 The table (or ‘matrix’) below presents a summary of the appraisal of reasonable growth scenarios presented above. The table includes a row for each component of the SA framework (introduced above), and within each row, the aim is to **1)** rank the scenarios in order of performance (with a star indicating best performing and “=” used where it is not possible to differentiate with confidence); and then **2)** categorise performance in terms of significant effects using **red** (significant negative) / **amber** (moderate/uncertain negative) / **light green** (moderate/uncertain positive) / **green** (significant positive) / no colour (neutral).
- 6.15.2 The appraisal shows a mixed picture, but Scenario 1 is clearly shown to have drawbacks. Having said this, the conclusion is not necessarily that this is the worst performing scenario overall. That is because the appraisal is not undertaken with any assumptions made regarding the degree of importance / weight that should be assigned to each of the topics (such that the intention is not that the matrix should be used to calculate a total score for each of the scenarios and, in any case, any attempt to do so is complicated by a need to account for both order of preference and conclusions reached on significant effects).
- 6.15.3 Also of note are the appraisal conclusions for the highest growth scenarios, namely Scenarios 6 and 7. The appraisal essentially serves to highlight significant arguments for and against higher growth (albeit recalling that even the highest growth scenario appraised would generate significant unmet housing need), and it is for the Council to weigh these pros and cons in the balance before reaching a conclusion on how these scenarios perform overall relative to the lower growth scenarios. The other point to note regarding the higher growth scenarios is that the appraisal conclusion under several of the topic headings reflects an assumption that minimising unmet need is very important for the achievement of sustainability objectives, given the challenges involved with / barriers to providing for unmet need from Epsom and Ewell elsewhere within a constrained sub-region.

6.15.4 As a final point, it is appropriate to note that there are other scenarios falling in between those appraised that were not defined and appraised as a pragmatic step (i.e. to keep the scenarios to a manageable number, suited to understanding and engagement) and because of a lack of confidence that the appraisal would lead to meaningful differentiation in terms of significant effects. In particular, there are three 'missing' scenarios in between Scenarios 5 and 6, involving Scenario 2 plus two out of Horton Farm, Downs Farm and the 'Southern Cluster'. In light of the appraisal, it is fair to say that, of these three missing scenarios, attention focuses on a scenario involving Scenario 2 plus Horton Farm and Downs Farm.

Table 6.1: Growth scenarios appraisal summary

Scenario	1 Low growth	2 Scenario 1 + Hook Rd Ar.	3 Scenario 2 + S. Cluster	4 Scenario 2 + Downs Farm	5 Scenario 2 + Horton Farm	6 Scenario 2 + SC, DF, HF	7 Scenario 6 + two sites
Topic	Order of preference (numbers) and predicted significant effects (shading)						
Accessibility	5	4	3	2	1★	1★	2
Air quality	3	2	2	1★	1★	1★	1★
Biodiversity	3	2	2	1★	1★	1★	3
CC adaptation	1★	1★	1★	1★	2	1★	1★
CC mitigation	2	1★	1★	1★	1★	1★	1★
Communities	2	1★	1★	2	2	3	3
Economy / emp.	7	6	5	4	3	2	1★
Historic env.	2	1★	1★	1★	1★	1★	3
Housing	7	6	5	4	3	2	1★
Land and soils	2	1★	1★	1★	1★	1★	1★
Landscape	2	1★	4	3	1★	5	5
Transport	4	3	3	2	1★	3	2
Water	2	2	1★	1★	1★	2	2

7 The preferred scenario

7.1 Introduction

7.1.1 This section presents the response of EEBC Officers to the appraisal.

7.2 Selecting the preferred scenario

7.2.1 The following statement explains EEBC Officers' reasons for supporting **Scenario 5**:

"Providing for housing needs is a key issue, and providing for affordable housing needs in particular is a key local priority. Unmet housing need leads to a wide range of issues, at the local and wider sub-regional scale. However, the appraisal serves to highlight a range of drawbacks to higher growth, hence the plan follows a middle path, striking a balance across competing sustainable development objectives.

In particular, the appraisal serves to highlight significant drawbacks to Scenario 1, and we believe that significant weight can be attributed to these drawbacks, such that Scenario 1 is judged to perform poorly overall. There is a clear need to take steps to minimise unmet housing need as far as possible, not least because of the levels of affordable housing need that exist locally, which is a figure many times higher than the 30 homes affordable homes per annum delivery figure that the Borough has averaged over the past six years. Furthermore, minimising unmet housing need is important from wide-ranging other perspectives, including from a perspective of supporting the local and sub-regional economy and supporting the achievement of transport, decarbonisation and certain environmental objectives.

From the appraisal it is apparent that Scenario 4 also performs reasonably well, but there is clear evidence that Scenario 5 is preferable, particularly once account is taken of the precautionary nature of the appraisal conclusion under 'climate change adaptation'. Specifically, whilst Horton Farm intersects a surface water flood zone there is ample opportunity to leave land at risk undeveloped as blue / green infrastructure.

Under Scenario 4 Horton Farm is substituted for Downs Farm, but it is recognised that there is also a 'missing scenario' (omitted from the appraisal for clear reasons discussed above, in Section 6.15) whereby Downs Farm is allocated *in addition to* Horton Farm (i.e. a scenario in-between Scenarios 5 & 6). This omitted scenario would likely perform similarly to Scenario 6 (a higher growth scenario) but better than under the 'Landscape' topic heading (because it would not involve allocation of the 'southern cluster').

With regards to Scenario 3, it is difficult to see how this scenario could justifiably be supported ahead of either Scenario 4 or Scenario 5, although it is noted that one of the cluster of three sites is proposing to make a very significant area of land available for publicly accessible green infrastructure. Also, it is recognised that whilst the appraisal assumes that the cluster of three sites would come forward in combination, in practice there is the potential to allocate just one of the sites or two of the three.

With regards to Scenario 2, whilst the appraisal does not flag significant concerns other than in one respect (housing, which is a significant concern for all scenarios), it should be noted that this scenario is judged by the appraisal to perform *relatively* poorly under most of the appraisal topic headings. It is also important to emphasise a risk that this could well be seen as not representing a suitably proactive approach to providing for local housing needs. This is in context of a sub-region where unmet need is already a major issue and in the context of a Government focused on addressing the housing crisis and delivering economic growth. Alongside this, it is also important to recall that the Government has recently communicated to the Planning Inspectorate that they should reject plans that are fundamentally unsound.

Finally, with regards to the higher growth scenarios (i.e. Scenarios 6 and 7), whilst the effect would be to close the gap to LHN / reduce unmet housing need, a key issue clearly impacts to the Green Belt with resulting implications for wide-ranging objectives (including landscape, biodiversity and communities), plus there would be a need to allocate some sites in less accessible locations. The appraisal also recognises that there would be a risk of significant local objection such that the plan struggles to progress (or, at least, progress in a timely fashion, in the context of an urgent need to adopt a Local Plan). There is also a specific issue with one of the sites that features only under Scenario 7, namely Land adjacent to Ewell East Station, specifically that only parts of the site are in the control of the freeholder, meaning that the availability and deliverability of the wider site cannot be confirmed at the current time (and it is important that the Local Plan only commits to delivering sites where availability is confirmed).

Overall, whilst the choice between growth scenarios is challenging, in light of the discussion above Scenario 5 is considered to be justified (NPPF paragraph 35) in that it is "*an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence*".

Part 2: What are the appraisal findings at this stage?

8 Introduction to Part 2

- 8.1.1 The aim of this part of the report is to present an appraisal of the Local Plan as a whole.
- 8.1.2 The appraisal builds upon the appraisal of **Growth Scenario 5** above, with added consideration given to:
- Site allocations that are a ‘constant’ across the growth scenarios; and
 - Development management policies (borough-wide and area/site-specific).

Overview of the plan

- 8.1.3 The plan presents policies under the following headings:
- Spatial strategy
 - Site allocations
 - Homes for all
 - Economy
 - Built and natural environment
 - Infrastructure
- 8.1.4 The appraisal focuses on policies under the first two headings, whilst also considering how other policies will serve to mitigate the impacts of growth and ensure that growth-related opportunities are realised. This approach is taken of the need to focus the appraisal on significant effects.

Appraisal methodology

- 8.1.5 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each sustainability topic the aim is to discuss the merits of the Proposed Submission Local Plan, as a whole, before reaching an overall conclusion on significant effects.
- 8.1.6 Specifically, the regulatory requirement is to “identify, describe and evaluate” the significant effects of “the plan” taking into account the available evidence and also mindful of wide-ranging effect characteristics, e.g. effects can be short or long term, direct or indirect, and where:
- An effect is a predicted change to the baseline situation, which is not simply a snap shot of the current situation, but also a projection of the current situation in the absence of the Local Plan. As part of this, there is a need to recognise that housing growth locally would continue in the absence of the Local Plan. Also, neighbouring local authorities would have to consider providing for the Borough’s unmet need.
 - The significance of any given effect is judged taking into account not only the magnitude of the predicted change to the baseline situation but also established objectives and targets (e.g. in respect of net zero).
- 8.1.7 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the Local Plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future). In light of this, there is a need to make considerable assumptions regarding how the Local Plan will be implemented and the effect on particular ‘receptors’.
- 8.1.8 The appraisal aims to be systematic and to explain assumptions. However, there is also a need for conciseness and accessibility, for example noting that a Government Committee in 2022 [emphasised](#) a need to: “*streamline the current bureaucracy and overcomplication associated with... assessments.*” Also, in 2023 SA was described within a Government [consultation](#) as “... a nightmare... unintelligible...”
- 8.1.9 In practice, there is a particular focus on the proposed approach to land supply / spatial strategy or, in other words, the proposed allocations in isolation and in combination (also accounting for permissions).
- 8.1.10 This approach is also taken mindful that the Government’s Planning Practice Guidance (PPG) is clear that SA should focus on significant effects, which translates as a need to focus primarily on the merits of the proposed approach to land supply (allocations and broad locations; see NPPF paragraph 69) to meet objectively assessed needs and wider plan objectives. There is inherently relatively limited potential to predict significant effects for borough-wide thematic policy, mindful that significance is defined in the context of the plan as a whole. Equally, it is the proposed approach to land supply / spatial strategy that generates overwhelmingly greatest interest amongst local residents and wider stakeholders.

Introducing the urban allocations

8.1.11 The plan presents a total of 30 allocations within the existing urban area; however, not all warrant being a focus of the appraisal, for a range of reasons, and recognising that there is merit in focusing attention on the matter of Green Belt allocations, given a need to focus the appraisal on ‘significant effects’.

8.1.12 Firstly, there is no need to focus attention on those allocations that deal with sites that feature within the recently published **Epsom Town Centre Masterplan**. This is because in all cases the allocation seeks to align fully with the Masterplan, and the process of preparing the Masterplan allowed for ample opportunity to explore issues/opportunities and options with the various sites. Specifically:

- SGN Site, Hook Road Car Park and Sollis House – are three adjacent allocations that are a focus of the Masterplan and have a combined capacity of 635 homes. It is recognised that this amounts to a major redevelopment in the Epsom context, but there is little potential to add to the discussion presented within the Epsom Town Centre Masterplan. It is also noted that there is currently a live planning application for SGN Site, which is by far the largest of the three sites within the cluster (455 homes). Clearly, from an ‘SA perspective’, there is strong encouragement for a carefully coordinated scheme, e.g. via a combined planning application, but there is little reason to suggest that individual planning applications under the framework of the Masterplan will risk issues arising or opportunities going missed.

Finally, with regards to this key cluster of sites, it should be noted that there are two further adjacent sites detailed in the LAA which are not allocations, on the basis that they are ruled out through the Site Assessment, as discussed in Section 5.4. At the Draft Plan Stage (2023) the proposal was to incorporate these sites within a comprehensive scheme, but the proposal at that stage was not to deliver significantly more homes (specifically, 630 homes were proposed).

- Epsom Town Hall, Hope Lodge Car Park, Former Police and Ambulance Station Site and Epsom Clinic – are a cluster of sites that together are proposed for 167 homes. It is also the case that one of the sites (Former Police and Ambulance Station Site) has planning permission which is reflected by the site allocation, and Epsom Clinic is at the pre-application stage.
- Depot Road and Upper High Street Car Park – is also a focus of the Masterplan. Here the proposal is to deliver 100 homes alongside a new decked car park and it is recognised that there are sensitivities / challenges, including given the adjacent Pikes Hill Conservation Area.
- Global House and Finachem House (2 – 4 Ashley Road) – are then the final sites that are a focus of the Masterplan, and together are set to deliver around 95 homes, which is broadly in line with the proposal at the Draft Plan stage (2023). It is noted that Finachem House is at the pre-application stage, and so it will be important to ensure a suitably coordinated scheme with adjacent Global House.

Figure 8.1: Opportunity sites within the Epsom Town Centre Masterplan (2024)



8.1.13 Secondly, of the remaining sites are a number have **planning permission**, namely:

- Epsom General Hospital – has permission for approximately 305 units (C2) older people's accommodation (Use Class C2), 24 key worker units (C3) and a children's nurse (Use Class E), in line with the proposed allocation.
- Land to the Rear of Rowe Hall – has planning permission for 96 self-contained apartments (C2), staff and communal facilities (EP23/00633/CMA), in line with the proposed allocation.
- 65 London Road – has recently been the subject of numerous unimplemented planning permissions. The expectation is that the site will deliver a care home up to 81 bedrooms (use class C2).
- Bunzl, Hook Road – has prior approval for 24 homes ([23/01440/PDCOU](#)) although it is also noted that there is a subsequent pending planning application for a roof extension to deliver 11 additional homes ([24/00230/FUL](#)). The proposed allocation is for approximately 20 homes, but it is fair to flag a degree of uncertainty regarding the quantum of residential development that will be delivered.
- 79-85 East Street – has permission for a 31 home scheme in line with the proposed allocation ([22/01953/FUL](#)). However, there is also current planning permission for a roof extension to deliver three additional homes ([22/01954/FUL](#)), again suggesting some uncertainty around this site.
- 140-142 Ruxley Lane – has permission for a 14 home scheme, but the plan assumes 12 homes.

8.1.14 This leaves **12 urban allocations**. However, numerous of these are small sites, others have a planning history (such that site-specific issues / opportunities have been explored and are likely well-understood) and the majority of sites were consulted on at the Draft Plan stage (2023). The 12 sites are as follows:

- Swail House (**45 homes**) – is located within the town centre, but is not a focus of the Town Centre Masterplan, recognising that the proposal is to deliver refurbishment of locally listed Sail House for residential use and the provision of replacement purpose-built specialist accommodation for the RNIB consisting of approximately 45 dwellings (net) located to the rear of Swail House. The latest proposal is an adjustment from that at the Draft Plan stage (2023), when there was support for ~100 homes.
- Land at Kiln Lane (**40 homes**) – is located a short distance to the north of the SGN cluster. It is a new site identified subsequent to the Draft Plan stage (2023).
- Hatch Furlong Nursery (**30 homes**) – is located a short distance to the north of Ewell East Station. It was previously identified as a site that could deliver 25 homes at the Draft Plan stage.
- 60 East Street (**30 homes**) – is located close to the SGN cluster and is a new site since the Draft Plan stage (indeed, it does not appear in the LAA). There is a pending application for permitted development to convert this vacant office block into residential dwellings.
- Etwelle House, Station Road (**20 homes**) – is located adjacent to Ewell East Station (and, in turn, the Land Adjacent to Ewell East Station Green Belt site option discussed in Section 6). It was previously identified as a site that could deliver 10 homes at the Draft Plan stage.
- 22-24 Dorking Road (**18 homes**) and 63 Dorking Road (C2 equivalent to 6 C3) – are two near adjacent sites to the south of the town centre also very closely related to Epsom General Hospital. The former site was supported in 2023 and has recently been the subject of a refused application for 20 homes.
- Esso Express, 26 Reigate Road (**10 homes**) – is located a short distance to the south of Ewell West Station. It was previously part of an identified site at the Draft Plan stage.
- 35 Alexandra Road (**8 homes**) – is located to the east of the town centre. It was previously identified as a site that could deliver 6 homes at the Draft Plan stage, and there was a recent planning application.
- Richards Field Car Park (**7 homes**) – is located to the west of Ewell West station (close to Hook Road Arena). It was previously identified as a site expected to deliver 10 homes at the Draft Plan stage.
- Garages at Somerset Close & Westmorland Close (**6 homes**) – is located a short distance to the west of Ewell West Station and has been the subject of multiple recent planning applications. It was previously identified as a site expected to deliver 6 homes at the Draft Plan stage.
- 64 South Street Epsom (**6 homes**) – is located a short distance to the south of the town centre. It was previously identified as a site expected to deliver 6 homes at the Draft Plan stage.
- Corner of Kiln Lane and East Street (101b East Street) (**5 homes**) – has an unimplemented planning permission. It was previously identified as a site expected to deliver 20 homes at the Draft Plan stage.
- 7 Station Approach (**5 homes**) – is very close to Stoneleigh Station. It was previously identified as a site expected to deliver 10 homes, and there was recently a refused application for 13 homes.

9 Appraisal of the Draft Plan

9.1.1 This section presents an appraisal of Proposed Submission Local Plan (as a whole) under the SA framework (see Section 3). Each appraisal narrative firstly gives consideration to the spatial strategy, before giving consideration to development management (DM) policies and then reaching a conclusion.

9.2 Accessibility

9.2.1 The appraisal in Section 6 is strongly supportive of the preferred growth scenario, although there is an equal degree of support for one of the higher growth scenarios. Both of the variable sites that are a focus of the appraisal in Section 6 (Horton Farm and Hook Road Arena) perform strongly from an accessibility perspective, perhaps most notably Hook Road Arena, which is a council-owned site able to deliver a new sports hub for the Borough (alongside ~100 homes). With regards to Horton Farm, as a large strategic site there is excellent potential to deliver new/upgrade community infrastructure alongside new homes, but there remains a need for ongoing work to confirm what is needed and deliverable in practice.

9.2.2 With regards to sites held constant across the growth scenarios appraised in Section 6:

- Land at West Park Hospital – neither site is associated with a significant issue/opportunity. Consideration had been given to the possibility of a medical facility on the northern site, but this is not supported by the NHS (the current focus is now on the option of a facility at Horton Farm).
- Chantilly Way – as a small site would deliver few benefits beyond new homes.
- Epsom Town Centre Masterplan sites – these need not be a focus of appraisal, as discussed in Section 8, but it is nonetheless appropriate to comment here on the extent to which realising community infrastructure benefits was a focus of work to prepare the Masterplan. In particular, the key site is Hook Road Car Park & the Southern Gas Network site, which will deliver a mix of uses, complimenting the high street to the south, and to include a new bespoke performing arts centre for the Laine Theatre Arts. More widely, there is a focus within the Masterplan on delivering new homes in order to maintain and enhance the role of the town centre as the Borough's main hub for community services and facilities.
- Other urban sites – none of the sites listed in Section 8 will deliver significant new or upgraded community infrastructure in isolation, but they may be able to contribute to infrastructure benefits via CIL / S106 payments, and none give rise to any concerns of note in terms of loss of community infrastructure. There are wider questions around accessibility to existing centres and how this has been taken into account as part of work to define site capacities, but no sites warrant particular mention in this regard.

9.2.3 With regards to development management (DM) policies, it is appropriate to make a general point here about the importance of balancing a desire for new homes to be delivered alongside community infrastructure (e.g. see Policy S17, Infrastructure Delivery) with a need to account for: A) wider competing policy asks of developers with cost implications, e.g. affordable housing and net zero development; and B) the parameters imposed by development viability. Policy S2 (Sustainable and Viable Development) states that viability “*will only be considered a constraint [at the planning application stage] in exceptional circumstances and where there are significant additional costs not anticipated through the Local Plan process*”, which serves to highlight the importance of Whole Plan Viability Study (2023). The further context is an understanding that if sites are delayed or do not come forward due to viability issues then there could be implications for delivering on the committed housing land supply and, in turn, there could be a risk of the Borough being subject to the presumption in favour of sustainable development.

9.2.4 Many wider DM policies are broadly supportive of accessibility objectives, e.g. Policy DM20 (Community and Cultural Facilities) and Policy DM21 (Education Infrastructure), but policies are mostly nationally standard (in the context of a Government commitment for National DM policies). No policies can be identified that give rise to a significant tension with accessibility objectives.

9.2.5 In **conclusion**, the Local Plan as a whole is predicted to result in a **‘moderate or uncertain’ positive effect** on the baseline (accounting for established objectives) as per the conclusion reached for Scenario 5 in Section 6. There is a case for predicting significant positive effects recognising that the baseline situation is one whereby growth comes forward in a more piecemeal and ultimately sub-optimal way giving rise to issues and opportunities missed. However, on the other hand, the community infrastructure opportunities set to be realised through the plan are of somewhat limited significance (although there remains flexibility to consider delivery of a new school at Horton Farm, should this be required).

9.3 Air quality

- 9.3.1 The appraisal in Section 6 is supportive of the preferred growth scenario, although this is equally the case for other growth scenarios bar low growth (because unmet need is not supported from a transport and, in turn, an air quality perspective). Neither of the variable sites that are a focus of the appraisal in Section 6 (Horton Farm and Hook Road Arena) are associated with any significant issues from an air quality or wider environmental health perspective (e.g. accounting for noise pollution), and this part of the Borough benefits from good sustainable transport connectivity, particularly high quality cycle infrastructure.
- 9.3.2 With regards to sites held constant across the growth scenarios appraised in Section 6:
- Land at West Park Hospital and Chantilly Way – no major issues or opportunities of note, but both are well located for bus connectivity. In the case of West Park Hospital there may be the potential to maintain / enhance the E10 bus service that serves the site is seen as an opportunity, whilst at Chantilly Way there is the potential for the E9 service to run to serve both the site and the adjoining Horton Farm site.
 - Epsom Town Centre Masterplan sites – it can be noted that air quality is a focus of the Masterplan, which explains: *“The prioritisation of traffic in the town has reduced the amount of ‘effective space’ available for walking and cycling and it detrimentally impacts on urban environmental quality...”*
 - Other urban sites – several are closely associated with a main road or a train line, but there will be good opportunity to address concerns through design measures. One site of note is Hatch Furlong Nursery (30 homes), which is located at the junction of two A-roads, but it is noted that site specific policy requires: *“Provide suitable noise attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from traffic on the A24 Ewell Bypass.”*
- 9.3.3 With regards to DM policies, a key point to make here is that site specific policies include quite limited requirements around delivering or making contributions towards specific sustainable transport infrastructure improvements. However, it is recognised that the Epsom Local Cycling and Walking Infrastructure Strategy ([LCWIP](#)) is not yet adopted by SCC (although it has been endorsed by EBC). Other policies that are broadly supported from an air quality perspective include Policy S19 (Transport) and Policy DM18 (Pollution and Contamination).
- 9.3.4 In **conclusion**, the Local Plan as a whole is predicted to result in a **neutral effect** on the baseline (which is broadly one of improving air quality, reflecting the move to electric vehicles, albeit particulate pollution from EVs will remain an issue). The distribution of growth does not give rise to any significant concerns, and a more significant consideration is potentially in relation to the total quantum of growth that is supported. On the one hand, as a more heavily urbanised part of Surrey there are some relative air quality issues within the Borough. However, on the other hand, there is relatively low car dependency and providing for unmet housing need distant from source can lead to problematic travel patterns. Also, some towns in wider Surrey are subject to significant air quality constraint. With regards to DM policies, there is a need for an ongoing focus on ensuring that growth-related opportunities to deliver improvements to sustainable transport infrastructure (also bus services) are realised.

9.4 Biodiversity

- 9.4.1 The appraisal in Section 6 is supportive of the preferred growth scenario, although the appraisal finds there to be two other growth scenarios that perform equally as well. Both of the variable sites that are a focus of the appraisal in Section 6 (Horton Farm and Hook Road Arena) give rise to few concerns from a biodiversity perspective, and both should be well placed to deliver an ambitious level of Biodiversity Net Gain (BNG). Hook Road Arena is associated with a valued TPO historic hedgerow, and there could be a risk of some impacts, but there is potential to make use of an existing access track to minimise impacts.
- 9.4.2 Maintaining a focus on Horton Farm and Hook Road Arena, it is also noted that the Wildlife Trust highlighted through the consultation in 2023 the importance of maintaining key green corridors along the site boundaries that contribute to established urban biodiversity opportunity areas.
- 9.4.3 With regards to sites held constant across the growth scenarios appraised in Section 6:

- Land at West Park Hospital – there are mature trees on both sites, and this is particularly the case for the southern site, where the nationally available dataset suggests significant onsite priority habitat. Onsite mature trees (and woodland, in the case of the southern site) are an important consideration given proximity to Epsom Common SSSI (the southern site) and Horton Park SNCI (the northern site). At both sites there is a requirement to: *“Establish a legal mechanism for long term management of green infrastructure, providing access for recreational purposes by the general public as well as residents of the development.”* Furthermore, for the more sensitive southern site there is a requirement to:

“Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees, incorporating these in a coherent landscaping strategy...”

It is recommended that ongoing consideration to the appropriate development capacity of the southern site, although it is recognised that the proposed approach is broadly unchanged from 2023, at which time no concerns were raised either by Natural England or Surrey Wildlife Trust.

- Chantilly Way – is notably unconstrained in biodiversity terms and is expected to deliver 20% BNG (with this also being the proposed requirement for Horton Farm and Hook Road Arena).
- Epsom Town Centre Masterplan sites – a number of the sites are constrained by TPOs, but there are otherwise not known to be any strategic biodiversity issues or opportunities. There are few SNCIs in the urban area, although the railway lines clearly act as important green corridors.
- Other urban sites – none of the sites include TPOs, but one site of note is the proposed northern extension to Longmead and Kiln Lane Industrial Estates (a new proposal since the Draft Plan stage). This is underused amenity land, but it does potentially have a degree of green infrastructure value, as this parcel of land is located immediately between the railway line to the east (where there is a cluster of woodlands) and a fluvial flood risk channel to the west (which clearly functions as an important green/blue corridor through the urban area, following Longmead Road).

9.4.4 With regards to DM policies, the first point to note is the proposed site specific requirement for the Green Belt allocations around avoiding impacts to veteran and other mature trees as part of a “coherent landscaping strategy”. This is a clear requirement, although further site-specificity would add to confidence regarding the potential to bring these sites forward at their proposed capacities.

9.4.5 The other key consideration is then policy on BNG, with the proposal being to require 20% BNG for the three greenfield Green Belt allocations. Given limited onsite constraints to growth at all sites the potential for this to be viable (alongside affordable housing etc) can be envisaged. It is also recognised that there is Surrey-wide evidence in support of requiring 20% BNG (such that the possibility arises of additionally requiring 20% BNG for the remaining two Green Belt site allocations). However, there is increasingly a focus nationally on the administrative challenge associated with sourcing suitable offsite biodiversity credits (to allow an overall net gain to be achieved, after having accounted for onsite biodiversity losses). In this regard it is understood that the Council is undertaking work with a view to potentially identifying one or more sites for biodiversity offsetting, e.g. see discussion of Site HOR003 in Section 5.4.

9.4.6 In **conclusion**, the Local Plan as a whole is predicted to result in a **neutral effect** on the baseline. The proposal is to focus Green Belt allocations to the west of the urban area, where there is biodiversity sensitivity, including given proximity/links to (and between) Epsom Common SSSI and Horton Country Park SNCI; however, most of the sites are relatively unconstrained, site-specific opportunities can be identified and the proposal is to require 20% BNG for three of the five sites. The other key consideration is growth quantum, in that unmet housing need could lead to increased pressure for growth in elsewhere in Surrey, where there is quite extensive biodiversity constraint, including internationally designated sites.

9.5 Climate change adaptation

9.5.1 The appraisal in Section 6 flags a degree of concern with the preferred growth scenario on account of surface water flood risk affecting parts of Horton Farm and Hook Road Arena. However, this reflects a precautionary approach as, in practice, there is confidence in the ability to avoid flood risk through masterplanning. At both sites clear site specific policy is proposed to ensure that flood risk is avoided, including with reference to the site specific guidance set out in the Level 2 SFRA (2024).

9.5.2 With regards to sites held constant across the growth scenarios appraised in Section 6:

- Land at West Park Hospital – there is a notable area of surface water flood risk affecting the southern site. However, to put this in context, within the recently developed Noble Park area adjacent to the north many of the new homes intersect a significant area of surface water flood risk.
- Chantilly Way – there is an area of surface water flood risk affecting the eastern part of the site, where there is currently a pond, and so consideration should be given to delivering this part of the site as green/blue infrastructure (although it is noted that trees are concentrated more in the west of the site).
- Epsom Town Centre Masterplan sites – flood risk is not discussed within the Masterplan, reflecting the fact that none of the sites intersect a fluvial flood risk zone; however, numerous of the sites intersect a surface water flood zone, which is a matter explored through the Level 2 SFRA. Delivering high quality Sustainable Drainage Systems (SuDS) in urban areas is an important climate change adaptation consideration, and so this could be a matter worthy of additional policy or signposting to guidance.
- Other urban sites – numerous of the sites intersect a surface water flood risk zone, and where this is the case the requirement is to: *“Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.”*

9.5.3 With regards to DM policies, in addition to the key matter of site-specific policy for sites intersecting a fluvial flood risk zone (discussed above), there is clearly support for Policy S16 (Flood Risk and Sustainable Drainage). Whilst there is limited local specificity, it is noted that there is additional reference to Nature Based solutions and Natural Flood Management following a request from the Environment Agency made through the Draft Plan consultation in 2023. It is noted that there is limited discussion of SuDS good practice, which is potentially appropriate given extensive national guidance. It is also noted that the policy does not reference groundwater flood risk, which it did previously at the Draft Plan stage.

9.5.4 Finally, it is noted that Policy S3 (Climate Change and Mitigation) includes a clear focus on climate change adaption / resilience, including a requirement to *“minimis[e] the potential for heat stress, through innovative design.”* It could prove appropriate to signpost to further guidance in this regard.

9.5.5 In **conclusion**, the Local Plan as a whole is predicted to result in a **neutral effect** on the baseline. Focusing on flood risk, few concerns were raised through the consultation in 2023, and since that time detailed work has been undertaken through a Strategic Flood Risk Assessment (SFRA). Overheating risk is another important climate change adaptation / resilience consideration (as understood from the EEBC Climate Change Study, 2023) and, in this regard, there is a degree of support for the ‘balanced’ nature of the proposed spatial strategy; specifically, the proposal to avoid undue high-density development in the urban area and to support some greenfield development (which allows for integration of green infrastructure, such that there will be shading and good access to greenspace during heatwaves, which is a particularly important consideration for those without access to a garden).

9.6 Climate change mitigation

9.6.1 The appraisal in Section 6 is unable to differentiate between the growth scenarios (beyond not supporting the lowest growth scenario) and concludes a degree of concern across all the scenarios, reflecting the fact that supporting built environment decarbonisation is a key national and local priority (such that there is a need to take a proactive approach through local plan-making, e.g. recalling that the NPPF has, ever since it was first introduced in 2012, required that Local Plans achieve “radical reductions” in emissions).

9.6.2 There is reason to suggest that both of the variable sites that are a focus of the appraisal in Section 6 (Horton Farm and Hook Road Arena) are associated with a degree of merit (i.e. built environment decarbonisation opportunity), specifically because: Horton Farm is a large strategic site, and the landowners (the Church Commissioners) have made a high level commitment to “net zero homes”; and Hook Road Arena comprises council owned land. However, it is not possible to be certain that built environment decarbonisation will be significantly prioritised ahead of competing objectives with cost implications (within the parameters of development viability).

9.6.3 With regards to sites held constant across the growth scenarios appraised in Section 6:

- Land at West Park Hospital – as brownfield sites there will be some additional development costs associated with demolition and refurbishment etc, with implications for development viability and, in turn, potentially viability ‘headroom’ that might be directed towards built environment decarbonisation measures. However, overall this is a part of the Borough thought likely to be associated with quite strong development viability, and the NHS as landowner could potentially lead to some additional opportunity.

- Chantilly Way – this is a small site that will not benefit from economies of scale, but this is seemingly a relatively easy-to-develop greenfield site thought unlikely to be subject to abnormal development costs, such that it might be well-placed to deliver net zero development to an exacting standard.
- Epsom Town Centre Masterplan sites – an objective of the Masterplan is to deliver: “*Deliver a zero-carbon ready town centre, and ensure buildings are constructed to a standard that can be easily adapted to meet the requirements of zero carbon.*” The statement is not clear on whether net zero would be achieved onsite, i.e. without resorting to offsetting but, assuming this is the case, this statement serves to highlight the key distinction between: A) development that achieves onsite net zero; and B) development that is “ready” to be net zero onsite once the National Grid decarbonises, which is currently anticipated to be around 2030 (but this date is the subject of live debate nationally at the current time).
- Other urban sites – it is difficult to reach a conclusion on the built environment decarbonisation merits of the proposed strategy to growth within the urban area (over-and-above committed sites and those others that are somewhat committed through the Town Centre Masterplan), although from a transport decarbonisation perspective there is clear support for maximising the number of homes delivered in the urban area. High density urban development sites can achieve high levels of thermal efficiency, but there is limited roof space per dwelling / resident to deliver solar PV. There can also be challenges around overheating risk, such that there can (or could, in the future) be a need for air conditioning (via reversing the operation of heat pumps), but concerns are reduced on the assumption that there will be relatively plentiful electricity from renewable sources during the summer months in the future.

Also, with regards to operational built environment emissions, there can be opportunities for high density schemes / clusters of schemes to deliver a heat network, but these are technically challenging, and in practice the only feasible opportunity is at the SGN Site / Hook Road car park within the town centre (also noting that this is proposed as a mixed-use scheme, which is a key factor when considering the feasibility of a heat network, because demand for heat will be relatively spread across the day / week).

Finally, beyond operational emissions, there is a need to consider embodied/embedded emissions associated with construction and demolition (also necessary refurbishment over the lifetime of a building). In this regard it is noted that most of the sites would involve demolition and rebuild, although one of the key non-committed urban sites – Swail House – would involve a building refurbishment, and other sites could potentially involve refurbishment, subject to further detailed work on design etc.

- 9.6.4 With regards to DM policies, the key point to note is a requirement for net zero development to an exacting standard, namely in line with the energy hierarchy, which means with a primary focus on efficiency (‘fabric first’) followed by onsite renewable heat/power generation and with offsetting of residual needs that cannot be met onsite (over the course of a year) only as a last resort. Achieving Passivhaus standard is an accepted approach to ensuring a suitably ‘fabric first’ approach to development, and the Buildings Research Establishment (BRE) also have established methods. Furthermore, the policy requires that the performance of scheme proposals is described/evaluated using an energy-based methodology, as distinct from the methodology applied under the Building Regulations. The two approaches are compared and contrasted in a recent report [here](#) and another even more recent report [here](#).¹⁶
- 9.6.5 Overall, Policy DM10 (Building Emissions Standards) is very strongly supported, and there is also support for the conciseness and clarity, recognising that that this can be a technical and confusing policy area, whilst there is a need to allow for ease of scrutiny (of planning applications).
- 9.6.6 It is also noted that Policy S3 references adopting a circular economy approach to building design and construction to reduce waste, to keep materials and products in use for as long as possible, and to minimise embodied carbon. However, it is noted that some other emerging policies nationally additionally set quantified requirements in these regards, often under the banner of minimising ‘whole lifecycle’ carbon emissions from the built environment (i.e. emissions not only associated with the operation of buildings but also construction, refurbishment and demolition). The recent Draft [Milton Keynes](#) Local Plan is an example of a plan that sets clear quantified requirements in this respect (although it is noted that the plan does not require onsite net zero development in respect of operational emissions). However, this is an evolving policy area such that there are uncertainties around implications for development viability.

¹⁶ Under the Building Regulations methodology the question for any given planning application is the extent to which the development can improve on a Target Emissions Rate (TER), measured in percentage terms up to a possible 100% improvement. The energy based methodology involves scrutiny in absolute terms, measured in terms of kWh /m2/yr. It has wide-spread support amongst specialists, including because it is very easily understood by non-specialists and because actual ‘as built’ performance can be monitored simply using a smart meter. A high proportion of recent and emerging local plans nationally present an energy based policy. However, on 13th December 2023 a Written Ministerial Statement was released which appears to prohibit its use.

9.6.7 In **conclusion**, having taken account of stringent / good proactive proposed DM policy, the Local Plan as a whole is predicted to result in a **neutral effect** on the baseline. This is a departure from the conclusion reached in respect of Growth Scenario 5 in Section 6 and reflects the requirement for net zero development (to an exacting standard, i.e. onsite and otherwise in-line with the energy hierarchy, and with application of an energy-based method for the purposes of calculating and communicating performance).

9.7 Communities

9.7.1 The appraisal in Section 6 is supportive of the preferred growth scenario in absolute terms but recognises that there is potentially a ‘communities’ argument for a lower growth strategy involving removing Horton Farm, which as a large strategic site is associated with significant level of local objection. With regards to Hook Road Arena, it is recognised that there are also some community concerns associated with this site, but the overriding consideration is that delivering a new sports hub is a key opportunity to be realised.

9.7.2 With regards to sites held constant across the growth scenarios appraised in Section 6:

- Land at West Park Hospital and Chantilly Way – neither site is associated with any significant issues or opportunities. Taken into account along with Horton Farm and Hook Road Arena there is a clear case to be put forward for development of these sites ‘completing’ the expansion of the urban area to the west, with remaining Green Belt protected in perpetuity and enhanced as green infrastructure.
- Epsom Town Centre Masterplan sites – the achievement of community objectives is clearly a key focus of the Masterplan. For example, see below for three of the seven Masterplan Principles.
- Other urban sites – no clear issues/opportunities over-and above those discussed under other headings.


9.7.3 With regards to DM policies there are clearly numerous policies with broadly positive implications for ‘communities’ objectives, and it is not possible to pinpoint any that give rise to a significant tension. A notable requirement under Policy DM12 (Health Impact Assessments) is that: “A *Health Impact Assessment should be provided for residential (C3) developments of 100 or more units...*” This is one example of the benefits that can be realised by supporting larger development sites.


9.7.4 In **conclusion**, the plan has been iterated over a number of years and in light of extensive consultation. There remain community concerns with the proposed approach to growth at a number of locations, such that there is a ‘communities’ case to be made for lower growth, but any such approach would also lead to a risk to progressing the plan to adoption, and a priority is undoubtedly adopting a Local Plan in good time so as to avoid further sites coming forward under the presumption in favour of sustainable development (including ‘planning by appeal’). Community concerns with growth are also allayed on account of the proposed suite of DM policies, both site-specific and borough-wide, and there is confidence in respect of Whole Plan Viability (and, in turn, confidence that the site allocations can deliver in a way that aligns with policy). Overall a **‘moderate or uncertain positive effect** on the baseline is predicted.

Figure 9.1: A page from the Epsom Town Centre Masterplan setting out key principles

MASTERPLAN PRINCIPLES

<p>PRINCIPLE #1 Adopt a context-led design approach to guide the development, regeneration and repair of the town centre. Having particular regard to the impact of building heights, building design, materials and land uses will ensure new development contributes to an improvement in the quality of the town centre. Pursue mainly low- and mid-rise, high-density housing which afford excellent levels of residential amenity and complement the character of the town centre whilst using land efficiently. Justify proposals for taller buildings using heritage and townscape impact assessments, and ensure tall buildings are positioned where they can make a meaningful contribution to townscape and placemaking, without undermining current residential amenity.</p>	<p>PRINCIPLE #2 Ensure development maximises opportunities to connect and enliven streets and spaces to create the conditions for vitality and liveability. Design so that people can delight in their surroundings, with enhanced public realm as the setting for the life of the town centre. New development should positively address public streets and spaces, with frequent entrances and overlooking of the public realm.</p>	<p>PRINCIPLE #3 Aim to deliver diverse and vibrant communities. Plan and design for an evolving demographic and socio-economic context, recognising trends and challenges in the housing, employment, retail and leisure markets. Delivering flexible spaces that can be easily repurposed over time, or cater for homeworking, or can be adapted for later-living will ensure their longevity and reduce future carbon.</p>
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9.8 Economy and employment

- 9.8.1 The appraisal in Section 6 is supportive of the preferred growth scenario in absolute terms but reflects a view that there is an ‘economy / employment’ argument for supporting higher growth. Neither of the variable sites that are a focus of the appraisal in Section 6 (Horton Farm and Hook Road Arena) would deliver significant new employment land, but at Horton Farm the proposal is to reuse some of the existing farm buildings to deliver small scale business ‘incubator space’. It can also be said that there would be some local economic benefits associated with delivering a new sports hub for the Borough.
- 9.8.2 With regards to sites held constant across the growth scenarios appraised in Section 6:
- Land at West Park Hospital and Chantilly Way – no significant issues or opportunities.
 - Epsom Town Centre Masterplan sites – the SGN site will deliver a new theatre with economic benefits, but otherwise the primary focus of allocations is for residential uses.
 - Other urban sites – no clear issues/opportunities over-and above those discussed under other headings.
- 9.8.3 Taking a step back, the key point to note is the following statement in Policy SA1 (Spatial Strategy): *“Employment needs (office, light industrial, industrial and warehousing) will be met through the intensification of existing strategic employment sites, and the delivery of additional employment floorspace that is compatible with residential use in Epsom Town Centre.”*
- 9.8.4 With regards to DM policies, there is a suite of policies that together should deliver on the broad strategy, including via the following clear requirement: *“To contribute towards meeting the future economic growth needs of the borough, Kiln Lane Industrial Estate, Longmead Industrial Estate... are designated as Strategic Employment Sites, to be afforded the highest protection and safeguarding for Employment Generating Uses... The intensification of these sites through redevelopment and regeneration will be supported to provide floorspace for Employment Generating Uses that meets the needs of the market.”*
- 9.8.5 It is also noted that Policy DM8 (Racehorse Training Industry) is a significant evolution from the equivalent policy at the Draft Plan stage (2023), and it is important to note that there is a significant proposed extension to the Racecourse Training Zone.
- 9.8.6 In **conclusion**, a **‘moderate or uncertain positive effect** on the baseline is predicted, including given that through protection and enhancement of existing employment areas the Local Plan will ensure an employment land supply in line with the needs set out in the HEDNA (2023). However, there is a degree of uncertainty on account of the scale of unmet housing need, recognising the importance of delivering housing for the local economy, including family and affordable housing.

9.9 Historic environment

- 9.9.1 The appraisal in Section 6 is supportive of the preferred scenario, although there are several other scenarios judged to perform equally as well (it is only the lowest and highest growth scenarios judged to perform relatively poorly). With regards to the variable sites that are a focus of the appraisal in Section 6, namely Horton Farm and Hook Road Arena, the former site is subject to notable constraint, but this is *relatively* limited in the context of a constrained Borough.
- 9.9.2 With regards to sites held constant across the growth scenarios appraised in Section 6:
- Land at West Park Hospital – the southern parcel is located within the Hospitals Cluster Conservation Area, and the existing hospitals buildings clearly have a degree of historic character. However, no major concerns were raised through the consultation in 2023, and site specific policy requires: *“Conserve and, where possible, enhance the setting of the West Park Conservation Area.”* It is understood that there are opportunities for refurbishment of the existing buildings, but this is not a specific requirement.
 - Chantilly Way – is unconstrained in historic environment terms, on the assumption that this small strip of open land does not contribute to the setting of nearby Grade II listed Horton Farmhouse.
 - Epsom Town Centre Masterplan sites – the town centre is highly sensitive, and the historic environment is a key focus of the Masterplan. The key SGN Site (cluster) is associated with relatively limited constraint, but Global House is quite central to the historic core (N.B. Epsom Town Centre Conservation Area appears within Historic England’s Heritage at Risk Register), and there is also a need to consider sensitivities associated with a new decked car park at Depot Road and Upper High Street Car Park.

- Other urban sites – 63 Dorking Road is Grade II listed and Swale House is locally listed, but both are expected to be conversions. Again, there could be merit to specifying this more clearly within site-specific policy, but equally it is recognised that there is a need to allow for design flexibility.
- 9.9.3 With regards to DM policies, the key point to note is that the majority of site-specific policies reference key historic environment sensitivities that must be taken into account at the planning application stage. This is supported, although there could be potential to add further specificity, with a view to generating further confidence that the sites can be brought forward (in a timely fashion) whilst avoiding or suitably mitigating impacts to the historic environment. Focusing on Horton Farm, whilst the policy sets out a requirement to “conserve and, where possible, enhance the setting of Grade II Listed Horton” there is the potential to set out further historic environment-focused site-specific policy that reflects the location of the site between three components of the Hospitals Cluster Conservation Area (see Figure 6.1, above). However, on the other hand, it is recognised that there is significant intervening screening, including built development.
- 9.9.4 Policy DM13 (Development Impacting Heritage Assets) is also clearly supported, from a historic environment perspective. This is a concise policy, which is an approach with considerable merit, recognising that the Government has committed to bringing forward National DM Policies and there is an expectation that these will cover DM policy in respect of planning for the historic environment.
- 9.9.5 In **conclusion**, an overall **neutral effect** is predicted, in line with the conclusion reached for Growth Scenario 5 in Section 6. Historic England did not raise significant concerns through the consultation in 2023, although it is recognised that they may wish to comment on the proposed focus of growth in and around the Hospitals Cluster Conservation Area at the current time.

9.10 Housing

- 9.10.1 The appraisal in Section 6 flags a significant concern with the preferred scenario, for the simple fact that it would involve generating significant unmet housing need. Specifically, the Local Plan identifies a total supply of 4,914 homes over the plan period, such that the proposal is to set the housing requirement at 4,700 homes (261 per annum) with a 4.5% ‘supply buffer’ as a contingency for unforeseen delivery issues.
- 9.10.2 This 4,700 home requirement figure compares to a Local Housing Need (LHN) figure of 10,242 homes (569 per annum), such that the Local Plan generates 5,542 homes unmet need. There is little if any confidence in the unmet housing need being provided for elsewhere within a constrained sub-region where unmet need is already a major issue, and it is also important to be clear that the proposed strategy will result in affordable housing delivery falling well below what is need (see discussion in Section 5.2).
- 9.10.3 A further consideration is the housing supply trajectory and, in turn, the question of whether the housing requirement can be set at 261 per annum from the outset or, alternatively, whether there is a need for an upward stepped housing requirement (which is not supported from a housing perspective, given the urgency of providing for housing needs and given that supply for the latter part of the plan period can be boosted through one or more plan reviews).¹⁷ In this regard, the current view is that a stepped requirement can be avoided, but there is reliance on certain key sites coming forward in a timely fashion, notably the SGN Site, which is currently the subject of an application for full planning permission ([24/01107/FUL](#)).¹⁸
- 9.10.4 Other than the matter of total growth quantum, the next key point to make is support for the Green Belt allocations, which will be well-suited to delivering a good housing mix to include family housing and a good amount (and mix) of affordable housing. Also, several of these sites will be well-suited to delivering an element self-build, in line with Policy S2, which requires self-build on sites of 100 or more dwellings (the context being that self-build is a means of assisting households with meeting their housing needs). Finally, it is important to note that greenfield sites tend to be associated with lower delivery risk than urban sites, such that there is confidence that they will come forward in line with the committed trajectory (see below).

¹⁷ The context is a need to ensure a five year housing land supply against the housing requirement at plan adoption.

¹⁸ There are objections to the proposed application, for example the Epsom Civic Society objects for reasons including: “In essence the Society considers that the application proposals are too intensive, massive and crammed for the site area. The heights of all blocks are too high. The Masterplan states ‘building heights up to 7 storeys, with further height to be justified’. ECS does not consider that the submitted Design and Access Statement nor the Heritage, Townscape and Visual Impact Assessment demonstrate that the proposed 8, 9, 11 and 12 storey blocks would not be harmful to their surrounding context.”

Figure 9.2: The housing trajectory

SOURCE	No. of units	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	TOTAL
Completions (2022-2024)	456	317	139																	456
Commitments (April 2024) – (667 with 10% lapse rate = 600)	600			200	200	200														600
Small windfall	455						35	35	35	35	35	35	35	35	35	35	35	35	35	455
Large windfall	407								37	37	37	37	37	37	37	37	37	37	37	407
URBAN SITES (20+)																				
SA1 - Southern Gas Network Site	455					160	200	95												455
SA2 - Hook Road Car Park	150									100	50									150
SA3 - Solis House, 20 Hook Road	20								20											20
SA4 - Buntz, Hook Road	20				20															20
SA5 - Epsom Town Hall	90						50	40												90
SA6 - Hope Lodge Car Park	30										30									30
SA7 - Former Police and Ambulance Station Site	47*						47													47*
SA8 - Epsom Clinic	30							30												30
SA9 - Depot Road & Upper High Street Car Parks	100									50	50									100
SA10 - 79-85 East Street	35						20	15												35
SA11 - Finachem House, 2-4 Ashley Road	20					20														20
SA12 - Global House	75								75											75
SA13 - Swail House	45						45													45
SA14 - 60 East Street	30				30															30
SA16 - Land at Kiln Lane	40								40											40
SA17 - Hatch Furlong Nursery	30							15	15											30
SA18 - Land rear of Rowe Hall	96						96													96
SMALL URBAN SITES (5-19)																				
SA15 - Corner of Kiln Lane & East Street (101B East Street)	5			5																5
SA19 - 7 Station Approach, Stoneleigh	5				5															5
SA20 - Esso Express, 26 Reigate Road	10							10												10
SA21 - Richards Field Car Park	7							7												7
SA22 - Etwelle House, Station Road	20						20													20
SA23 - 140-142 Ruxley Lane West Ewell Surrey	12			12																12
SA24 - Garages at Somerset Close & Westmorland Close	6					6														6
SA25 - 64 South Street, Epsom	6							6												6
SA26 - 35 Alexandra Road	8					8														8
SA27 - 22-24 Dorking Road	18							18												18
SA28 - 63 Dorking Road	6							6												6
GREEN BELT RELEASE																				
SA31 - Land at West Park Hospital - South	50							50												50
SA32 - Land at West Park Hospital - North	150								50	50	50									150
SA33 - Land at Chantilly Way	30								15	15										30
SA34 - Hook Road Arena	100									40	40	20								100
SA35 - Horton Farm	1,250									50	100	150	150	150	150	150	150	150	50	1,250
Actual / Projection		317	139	217	255	490	417	347	267	377	392	242	222	222	222	222	222	222	122	4,914

Note: Allocations SA29 and SA30 are not listed above as these sites have planning permission and are included in the commitments.
 *85 extra care apartments (C2) is the equivalent 47 C3 dwellings

9.10.5 Focusing on affordable housing, the current SGN planning application is of note. The Planning Statement explains (emphasis added):

*“In summary, the Site is subject to a minimum target of 40% affordable housing... Extensive viability assessments... demonstrate that the Proposed Development is **unable to viably support any affordable housing**. The main reasons for this are the strong Existing Use Value of the existing Site, the significant costs and associated risk of remediation and site preparation works inherent with a former gas holder site, together with the relatively modest residential values that are achievable in Epsom... Despite our viability conclusions, the Applicant is aware of the local need and desire for affordable housing and intends to deliver the proposed scheme with the inclusion of **10% affordable housing**. In doing so they would be accepting a profit margin that we consider to be significantly below-market but ensuring the delivery of much needed affordable housing helping deliver a mixed and balanced community.”*

9.10.6 Another key consideration is C2 older persons housing, and the first point to note is that this is the sole or primary focus of five allocations (all well-located in the urban area). Policy S7 (Specialist Housing) is then a criteria-based policy that should be supportive of windfall sites, and importantly the policy also sets out: *“Larger-scale new residential developments (over 200 C3 dwellings) will be required to incorporate specialist accommodation, in line with the above criteria, unless... not feasible.”* In this regard, it is noted:

- The current planning application for the SGN Site does not proposed C2 older persons housing.
- At Horton Farm there is a requirement to deliver specialist housing.

9.10.7 Finally, with regards to providing for Gypsy and Traveller accommodation needs, this matter has already been a focus of discussion in Section 6, and the simple fact is that Horton Farm is of crucial importance. It can deliver 10 pitches and without Horton Farm it is likely that needs would go unmet.

9.10.8 With regards to DM policies, there are a range of key policies of note, perhaps most notably:

- Policy S5 (Housing mix and type) – sets out that all developments are required to provide a mix of housing types and sizes as guided by the latest Local Housing Needs Assessment. Ensuring that sites deliver a good housing mix is one amongst many key reasons to adopt a Local Plan.
- Policy S6 (Affordable Housing) – the percentage of affordable homes on qualifying sites should be at least: 30% of the total number of homes on previously developed land; and 40% of the total number of units on greenfield. Furthermore, the policy specifies that 70% of the affordable housing should be for rent and 30% for affordable home ownership. It is clear that affordable housing is being prioritised within the context of whole plan viability, which is supported from a housing perspective.

- Policy DM1 (Residential Space Standards) is another policy that requires careful consideration from a whole plan viability perspective, i.e. there is a need to consider the cost implications of requirements, mindful that additional costs will have knock-on implications for the achievement of other policy objectives. The policy sets out requirements for internal and outdoor space and requires that a minimum of 10% of homes meet Building Regulations wheelchair adaptable dwellings standard, and a minimum of 20% of new affordable homes meet Building Regulations accessible compliance standard.
- Policy S8 (Gypsies, Travellers and Travelling Showpeople) – sets out a detailed criteria-based policy which should be suitably supportive of windfall planning applications, albeit the reality is that there is limited potential for windfall given the constrained nature of the Borough.

9.10.9 In **conclusion**, there is a clear need to predict a negative effect on the baseline, which is one whereby planning applications would be considered in the context of standard method LHN rather than the much lower proposed housing requirement. However, there are also many clear reasons to adopt the Local Plan, from a housing perspective, including with a view to setting clear policy requirements for housing mix and affordable housing and delivering Horton Farm, which is crucially important in a number of respects but not least given the potential to provide a mix of affordable homes and for Gypsy and Traveller accommodation needs. On balance it is considered appropriate to predict a **'moderate or uncertain' negative effect** for the Local Plan as a whole, but this is marginal, i.e. there is a case for predicting a negative effect given the extent of unmet housing need generated.

9.11 Land, soils and resources

- 9.11.1 The appraisal in Section 6 is supportive of the preferred scenario, although there are several other scenarios judged to perform equally as well (it is only the lowest and highest growth scenarios judged to perform relatively poorly). Both of the variable sites that are a focus of the appraisal in Section 6 (Horton Farm and Hook Road Arena) could potentially be put into productive agricultural use, although it appears that neither is at the current time (and a review of historic satellite imagery does not show any evidence of the fields having been ploughed over recent years / decades). As discussed above, it appears that the farm buildings at Horton Farm are now mainly in non-farming uses (the site is used for equestrian uses).
- 9.11.2 Other considerations relating to the housing requirement, spatial strategy and site selection can relate to minerals extraction (i.e. avoiding the sterilisation of known minerals resources) and contaminated land, but these are not thought to be major issues for the Local Plan. A number of the proposed urban allocations are subject to (or potentially subject to) contamination, as understood from site-specific policy, but this is a matter that can typically be addressed through remediation works ahead of development, albeit at a cost with implications for development viability (see discussion above of the SGN Site).
- 9.11.3 With regards to DM policy, there is only a need to briefly note Policy DM18 (Pollution and Contamination) which sets out a standard requirement (in the context of forthcoming National DM Policies).
- 9.11.4 In **conclusion**, a **neutral effect** is predicted, as per the conclusion reached in Section 6. It is important to recall that development would continue under the baseline scenario.

9.12 Landscape

- 9.12.1 The appraisal in Section 6 is strongly supportive of the preferred scenario, strongly preferring it to other scenarios that would involve delivering more homes or a similar quantum. This reflects a view that landscape is a significant constraint to growth locally, notwithstanding the fact that unmet need generated locally would lead to increased pressure for growth elsewhere within a constrained sub-region.
- 9.12.2 Both of the variable sites that are a focus of the appraisal in Section 6 (Horton Farm and Hook Road Arena) are subject to a degree of constraint, but Hook Road Arena performs very well relative to other Green Belt options in contention for allocation. Focusing on Horton Farm, one important question is whether there will be the potential to define a new defensible Green Belt boundary or, alternatively, whether there would be a risk of further development creep in the future. This matter is a focus of discussion in both Section 5 and Section 6, with the conclusion reached that the site performs well in this regard, both in absolute terms and relative to certain omission sites being actively promoted.
- 9.12.3 With regards to sites held constant across the growth scenarios appraised in Section 6:
- Land at West Park Hospital and Chantilly Way – no significant issues or opportunities.

- Epsom Town Centre Masterplan sites – townscape character is clearly a key focus of the Masterplan (see Figure 9.1 above), accounting for Epsom’s relatively low rise townscape character. As discussed above, there are currently objections to the SGN Site application on grounds of building heights/massing.
- Other urban sites – one larger non-committed site with a proposed density in excess of 100 dwellings per hectare (dph) is 60 East Street, where the proposal is for 30 homes on a 0.24 ha site. This site is located on the A24 on the edge of the town centre, and there is currently a four story building onsite. It is understood that the development is likely to be a refurbishment / conversion of the existing building.

9.12.4 With regards to DM policies:

- Policy DM16 (Landscape Character) – seeks to protect the Borough’s landscape by ensuring that development proposals are sensitively designed to complement and enhance the surrounding landscape. Development proposals must consider impacts on landscape features, views, landform, and landscape patterns. For larger development proposals (such as Horton Farm), developers must submit a Landscape and Visual Impact Assessment (LVIA) to consider the visual impact of the proposal.
- Policy DM17 (Trees, Woodlands and Hedgerows) – seeks to prevent the loss of, or damage to, trees, woodlands and hedgerows that contribute to the character/ amenities of an area. The policy also outlines that development proposals must incorporate tree lined streets/ new trees and incorporate a long-term management plan for planting schemes.
- Policy S18 (Green Infrastructure) – outlines support for development that protects and enhances existing, and/ or delivers new, green infrastructure within the Borough.

9.12.5 All of the above policies reflect limited local specificity, and it is noted that the forthcoming Surrey Local Nature Recovery (LNRS) will provide further evidence (the first [LNRS](#) nationally was recently adopted).

9.12.6 In **conclusion**, the plan is predicted to have a **neutral effect** on the baseline, recognising that the baseline is a scenario whereby development continues to come forward. The plan seeks to make best use of previously developed land (working within the parameters of work through the LAA to identify sites that are available) and the proposed Green Belt allocations are overall supported from a landscape perspective (in isolation and in combination, acknowledging that they are clustered in the west of the Borough). There is scope for further site-specific policy, e.g. concept masterplans for key sites, to provide further confidence that they can be successfully brought forward in a timely manner without undue landscape impacts.

9.13 Transport

9.13.1 The appraisal in Section 6 is very strongly supportive of the preferred scenario, preferring it to all of the other growth scenarios appraised, most notably the lowest growth scenario reflecting a view that: A) generating unmet housing need is highly problematic for from a transport planning perspective; and B) at this late stage in the plan-making process following a higher growth scenario would likely delay the plan significantly as there would be a need for further work to explore transport issues / impacts.

9.13.2 In turn, it follows that both of the variable sites that are a focus of the appraisal in Section 6 (Horton Farm and Hook Road Arena) are broadly supported from a transport perspective. Focusing on Horton Farm, the appraisal in Section 6 explains that the site: *“...has reasonable train and bus connectivity, with work having established that there is the potential to divert two bus services into the site, which is encouraging albeit bus services are inherently uncertain... There is also very good cycle connectivity, including to existing local centres (there are offroad routes on nearly all sides of the site), very good road access (subject to ongoing work, including noting surface water flood risk), and there is an opportunity to better-connect the somewhat isolated community of Long Grove.”*

9.13.3 With regards to sites held constant across the growth scenarios appraised in Section 6:

- Land at West Park Hospital and Chantilly Way – the former site is not particularly well connected to the town centre by walking, cycling or public transport, but there is bus connectivity (see Figure 9.3).
- Epsom Town Centre Masterplan sites – maximising housing growth in and around the town centre is a key priority, from a transport perspective. In this regard, there is a case to be made for the site capacities set out in the Town Centre Masterplan being kept under review, such that there is flexibility to respond to changes to the local context. For example, from a transport perspective, and in the context of constrained housing supply options as understood from work to prepare the Local Plan, there is a case for supporting higher development densities at those sites within walking distance of Epsom Station.

- Other urban sites – three sites are notably within easy walking distance of Ewell East Station, and of these: the site adjacent to the station has a proposed density of 100dph; and the other two sites have proposed densities closer to 60dph. These are relatively high densities from a townscape perspective, but from a transport perspective there could be a case for considering higher densities.

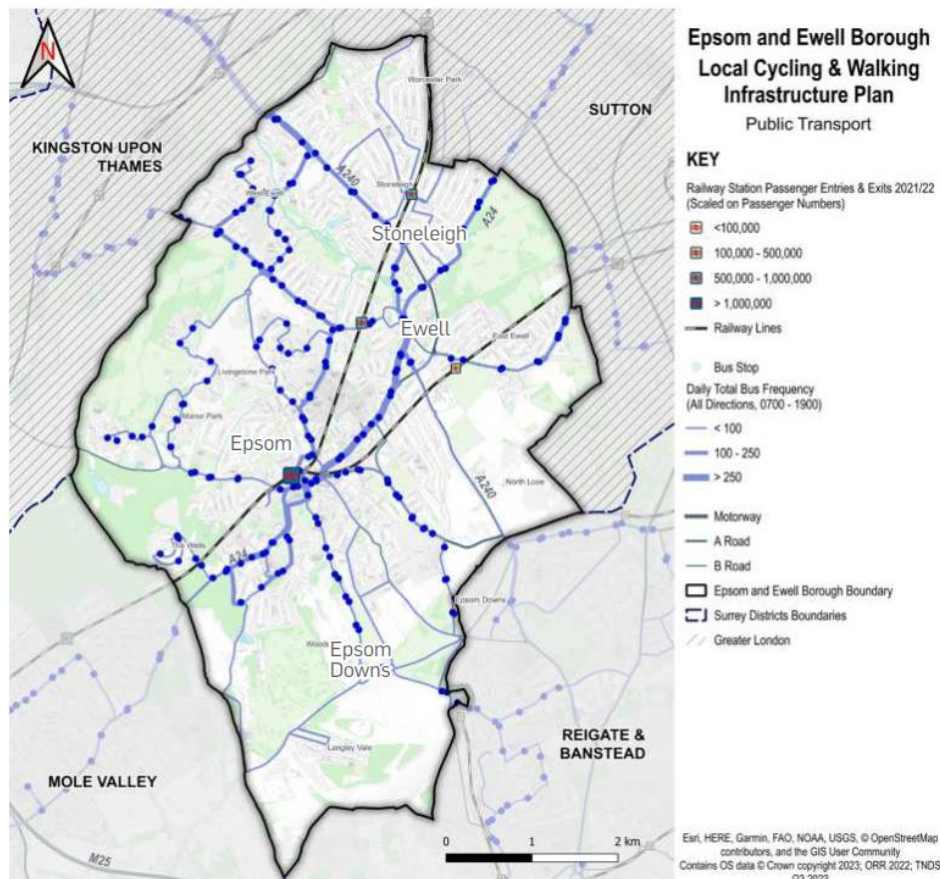
9.13.4 With regards to DM policies, the first point to note is fairly limited detail set out within site-specific policies, for example the following requirement for Horton Farm is one of the more detailed: *“Provide permeability through the site for pedestrians and cyclists into and from the development to provide connectivity between adjoining residential areas and associated facilities and Horton County Park.”* Ideally there would have been greater opportunity to reflect LCWIP priorities within site specific policies, for example Hook Road Arena is adjacent to a cycle corridor identified as a phase 1 priority in the LCWIP. It is noted that the following discussion of developer funding in the LCWP does not reference the Local Plan:

“Developer funding: Through the Planning process, the council as Local Planning Authority will negotiate with developers in order to mitigate any potential impacts of new development or accommodate the expected increased travel demand, especially walking, cycling and public transport. Developers are asked to pay for, or contribute towards, the cost of the additional infrastructure required. The level of contribution will be related to the scale of the new development and its impact on the local area. For transport, these specific funds can be secured via a legal agreement (Section 106) or works can be agreed that the developer fully pays for. However, the use of S106 planning obligations is mainly limited to site-specific mitigation measures. There is also the Community Infrastructure Levy (CIL)...”

9.13.5 Numerous wider policies are then broadly supportive of transport objectives, and it is difficult to suggest that any generate a significant tension. Focusing on Policy S19 (Transport), the policy sets out a fairly standard set of priorities, but the following is of note (N.B. unchanged from 2023): *“Car free development will be encouraged in appropriate locations and where supported by evidence demonstrating that proposals would not lead to parking stress.”* One consideration is ensuring that the policy is suitably future proofed, e.g. accounting for the recent micro-mobility and a future role for driverless cars.

9.13.6 In **conclusion**, it is appropriate to predict a **‘moderate or uncertain’ positive effect** in line with the conclusion reached in Section 6. Consideration should be given to integrating the findings of the LCWIP within site specific policies, with a view to realising growth-related opportunities as fully as possible.

Figure 9.3: One of many figures from the LCWIP (2024) introducing key transport corridors



9.14 Water

- 9.14.1 The appraisal in Section 6 is supportive of the preferred scenario but is equally supportive of the two other growth scenarios that would involve delivering a similar quantum of housing growth. It is difficult to elaborate further here, but one important point to note is Policy DM11 (Sustainable Water Use), which requires that all new homes meet the water efficiency standard of a maximum of 110 litres per person per day (lpppd). This is the 'optional' higher standard allowed by Building Regulations and is common practice. Some authorities nationally seek to justify a more stringent standard of 90 lpppd (e.g. Uttlesford), but there are significant development viability implications, and it is difficult to suggest what other policy area might be 'flexed' in order to create viability headroom to then allow for a more stringent approach to water.
- 9.14.2 In **conclusion**, and in line with Section 6, broadly **neutral effects** are predicted. It will be important to take account of consultation responses received from the Environment Agency and the water companies.

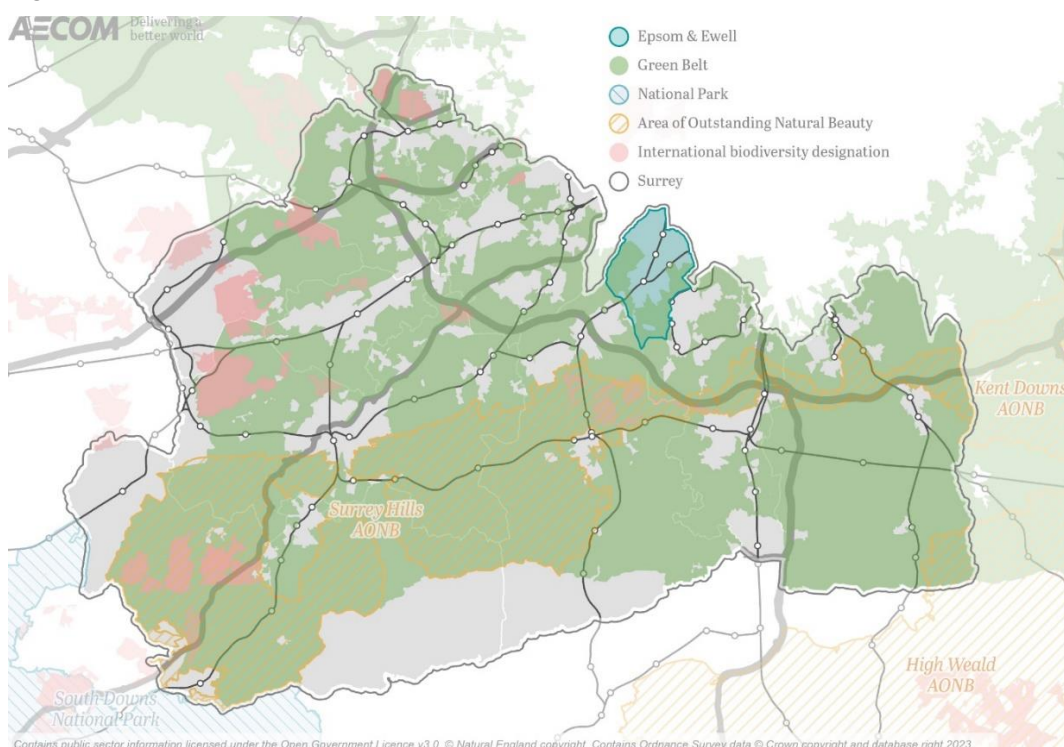
9.15 Overall conclusions

- 9.15.1 The appraisal conclusion is as follows:
- **Positive effects** – whilst the appraisal does not predict any significant positive effects, 'moderate or uncertain' positive effects are predicted under four headings: Accessibility (because the plan has a good focus on directing growth so as to deliver or otherwise support access to community infrastructure); Communities (recognising that the plan seeks to strike a careful balance between arguments for and against growth and has been iterated over a number of years including in light of consultation); Economy and employment (because the Local Plan will ensure that identified employment needs are met over the plan period, in particular by protecting and enhancing existing established key employment areas); and Transport (because growth is mostly directed to locations with good accessibility and connectivity credentials, albeit generating unmet housing need is not supported from a transport perspective).
 - **Negative effects** – the only predicted negative effect is under the Housing topic heading. Here the conclusion is a 'moderate or uncertain' effect, but this is marginal, i.e. there is a case for predicting a 'significant' negative effect. This is because the Local Plan will generate significant unmet housing need, although it is recognised that there are also many clear reasons to adopt the Local Plan, from a housing perspective, including with a view to setting clear policy requirements for housing mix and affordable housing and delivering Horton Farm, which is crucially important in a number of respects but not least given the potential to deliver a mix of housing, specialist housing and Gypsy and Traveller pitches.
 - **Neutral effects** – this is the conclusion under the remaining eight topic headings. This includes the key topic heading of Landscape, with the conclusion reflecting an understanding that the baseline situation is one whereby the Borough's Green Belt could come under pressure in the absence of an up-to-date local plan under the presumption in favour of sustainable development. Finally, with regards to climate change mitigation, whilst a concern with the proposed strategy / allocations is flagged through the appraisal in Section 6, the appraisal of the Local Plan as a whole is able to conclude a neutral effect because the proposal is to require net zero development (to an exacting standard), which is a notable evolution from the Draft Plan stage and reflects detailed work to consider Whole Plan Viability.
- 9.15.2 There will be the potential to make improvements to the plan through the forthcoming examination in public (although any changes must be with a view to addressing a soundness issue, as opposed to simply improving the performance of the plan). A small number of recommendations are made; however, it is inherently difficult to confidently make recommendations because actioning them will have implications that are difficult to foresee and account for here. For example, whilst it would be easy to recommend further policy stringency in respect of biodiversity net gain, this would have cost/viability implications such that there could be a need to accept trade-offs in respect of wider objectives (e.g. affordable housing, net zero or accessibility standards). Equally, whilst it is easy to suggest the possibility of further site-specific policy, this takes time and resources, and there is always a risk of being overly prescriptive, such that there is reduced flexibility at the DM stage, potentially impacting delivery.
- 9.15.3 Finally, it should be noted that the current version of the Local Plan was prepared taking account of the appraisal presented within Section 9 of the Interim SA Report (2021). There is no requirement for SA to be iterative in this way, but it helps to demonstrate a robust and sound plan-making process.

Cumulative effects

- 9.15.4 The regulations underpinning the SA process indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the Local Plan in combination with other plans, programmes, etc.
- 9.15.5 In practice, this is an opportunity to discuss potential 'larger than local' effects and, for Epsom and Ewell, a key issue is the question of whether, where and when unmet housing need will be provided for.
- 9.15.6 Figure 9.4 shows a selection of key sub-regional issues and constraints that create a challenge in respect of meeting unmet need from Epsom and Ewell. The figure serves to highlight key constraints including the Thames Basin Heaths SPA and the Surrey Downs National Landscape (formerly AONB). Wider environmental challenges include national and local biodiversity designations (e.g. landscapes associated with very high densities of ancient woodland in south Surrey); local landscape designations (including the Area of Great Landscape Value, AGLV, within Surrey, which is an extension of the National Landscape and currently being reviewed by Natural England with a view to potentially extending the National Landscape); and the 'water neutrality' constraint that is a major barrier to growth at Crawley, Horsham and other locations in the Sussex North Water Resource Zone. It should also be noted that land beyond the Green Belt within West Surrey is almost entirely urbanised, associated with the A331/ Blackwater Valley.
- 9.15.7 Furthermore, there is a need to consider locations other than Epsom and Ewell where unmet housing need is an existing or likely / potential future issue, and locations where plan-making work to date serves to evidence a conclusion that there is little or no realistic potential to provide for unmet needs. It is beyond the scope of this brief note to present a detailed review, but the issues are significant. For example, the Mole Valley Local Plan was recently adopted generating unmet need, and the recent conclusion of the Elmbridge Local Plan EiP serves to demonstrate that providing for need in full is a major challenge.
- 9.15.8 With regards to neighbouring and nearby London boroughs, it is clearly the case that the London Plan targets are challenging, plus there is the question of unmet need generated by the London Plan. The London Borough of Kingston recently consulted on a draft London Plan that proposes to meet the London Plan housing target via a major step change in the rate of housing delivery locally within the urban area, and within Kingston in particular. Croydon is another not-so-distant London Plan Opportunity Area, but the SA Report recently published alongside the Local Plan identifies limited opportunity for higher growth (the A23 in Croydon has been discussed as a growth corridor, but there are delivery barriers).
- 9.15.9 In summary, Surrey is an obvious key scale at which to deal with unmet need, but there are no clear mechanisms in place, and inherent challenges. Overall, it is difficult to suggest how, where or when provision might be made for unmet need from Epsom and Ewell.

Figure 9.4: Select sub-regional constraints to providing for Epsom and Ewell's unmet housing need



Part 3: What are the next steps?

10 Plan finalisation

- 10.1.1 Once the period for representations on the Local Plan / SA Report has finished the intention is to submit the plan for examination in public alongside a summary of the main issues raised through the Regulation 19 publication period. The Council will also submit the SA Report.
- 10.1.2 At examination one or more Government-appointed Inspector(s) will consider representations before identifying modifications necessary for soundness. Modifications will then be prepared (alongside SA if necessary) and subjected to consultation (alongside an SA Report Addendum if necessary).
- 10.1.3 Once found to be 'sound' the Local Plan will be adopted. At the time of adoption a 'Statement' must be published that sets out (amongst other things) "the measures decided concerning monitoring".

11 Monitoring

- 11.1.1 Within the SA Report the requirement is to present "measures envisaged concerning monitoring".
- 11.1.2 The following are suggestions / ideas for monitoring, although it is recognised that, in practice, there is a need to balance ambition with time and resource implications:
- Biodiversity – there will be a need to establish a regime for ensuring that decision making in respect of biodiversity net gain as part of planning applications is undertaken under a strategic spatial framework – informed by the forthcoming Local Nature Recovery Strategy – and then monitor effectiveness.
 - Communities – there could be merit in targeted monitoring of growth/change across the cluster of Green Belt allocations. For example, incidences of residents commuting to work by active or public transport.
 - Community infrastructure – Wokingham Borough is commended as an authority that sets out very clear information on progress in respect of delivering infrastructure at strategic growth locations (see [here](#)).
 - Climate change mitigation – monitoring should focus on clarity. This can be a confusing policy area, but it is very important that the interested public can understand / engage and scrutinise applications.
 - Climate change adaptation – a focus on monitoring development sites intersecting a surface water flood zone could be considered but would likely prove challenging. Regardless, there is a need for clarity on the different forms of flood risk.
 - Economy and employment – the nature of need/demand for office floorspace and industrial/logistics floorspace changes very quickly. Regular monitoring of delivery would assist with future assessments.
 - Historic environment – it can be difficult to know what monitoring indicators are most appropriate to apply. What is quite typical is to monitor the number of assets on the Heritage at Risk register, but this will not give a good picture of the local plans impacts or contextual changes to the historic environment.
 - Homes – this topic is already a focus of monitoring, but additional indicators could be explored, for example with figures broken down further by area and by housing type and tenure. Also, there is an increasing focus on tenure split for affordable housing, which might feed into monitoring. A focus on Gypsy and Traveller accommodation could also serve to inform future needs assessments.
 - Transport – there is a clear need for targeted detailed monitoring. As well as road traffic and air quality, there is a need for improved data on bus patronage and use of cycle routes. Also, understanding of strategic transport infrastructure issues and opportunities changes significantly over time (with work led by SCC), hence there is a need to consider local plan implications on an ongoing basis.
 - Water – there is a need for monitoring of the situation regarding wastewater treatment capacity and potentially also wider water quality. Also, there is a case for monitoring water efficiency standards.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
		What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the SA scope?	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?		<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table B: Interpreting Schedule 2 and linking the interpretation to the report structure

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3.
c) The environmental characteristics of areas likely to be significantly affected;	The SA scope – in terms of key sustainability issues and objectives, including accounting for evolution of the baseline without the plan – is then discussed within the appraisal sections as appropriate, i.e. in light of the options and proposals that are a focus of the appraisal.
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) fed into the 'SA framework', which is presented within Section 3. Also, information on the SA scope is presented as part of appraisal work in Sections 6 and 9. With regards to explaining " <i>how... considerations have been taken into account</i> ", Section 7 explains reasons for supporting the preferred option, i.e. how/why the preferred option is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the various effect characteristics.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan...	Section 9 presents recommendations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Section 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives / scenarios appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan...	This SA Report is published alongside the Proposed Pre-Submission Local Plan in order to inform representations and plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5 [and] the opinions expressed pursuant to Article 6... shall be taken into account during the preparation of the plan... and before its adoption or submission to the legislative procedure.	This SA Report will be taken into account when finalising the plan for publication (see Section 10). Also, it should be noted that an Interim SA Report was published alongside the Draft Local Plan in 2023. It presented the information required of the SA Report.