

Epsom & Ewell Local Plan Examination
Council Responses to Matter 5:
The SA and Approach to site selection, Plan Viability and the IDP
12 September 2025

The SA and the Approach to Site Selection

Issue 6: Whether the approach to site selection is justified and effective

- 6.1 At the Stage 1 hearing session on 28th August 2025 an error was highlighted within the SA Report in terms of a reference in Section 6.13. A Clarification Note has been produced to address this issue (attached as Appendix M5c).

Q6.1 Paragraph 5.2.44 of the SA states that it is reasonable and appropriate to hold constant the preferred development densities arrived at on the basis of the work through the Town Centre Masterplan and other work streams. Where is this work within the town Centre masterplan and what other work streams which relates to preferred development densities referred to here?

Town Centre Masterplan

- 6.2 The award winning Town Centre Masterplan was produced by David Lock Associates on behalf of the council to reflect that there were several sites being promoted for development through the call for sites process in Epsom Town Centre and the Council wanted to develop a comprehensive masterplan that could be used as evidence to support the Local Plan and form a material consideration for decision making.
- 6.3 The Town Centre Masterplan (document reference [HB06a](#)) sets out clear and comprehensive guiding principles for development of the Epsom Town Centre and was subject to two rounds of public consultation, with the second round of consultation on a draft Masterplan being undertaken in November and December 2023. The Masterplan is informed by a detailed Baseline Report providing background analysis of the local context.
- 6.4 Following feedback received during this consultation stage, the council requested that DLA look at the potential to increase the capacity of the following opportunity sites, these are summarised below:
- a) Town Hall / Hope Lodge Car Park / Clinic and Ambulance Station Site – in the draft Town Centre Masterplan these three sites were considered as one

opportunity site and the sites provided a mix of town houses and apartments. The Masterplan has been updated to split these sites into three distinct land parcels and revisit the development potential of the sites:

- b) Town Hall – a revised scheme has been included in the masterplan which is for two blocks of apartments as opposed to a scheme of townhouses. This approach would deliver up to 91 dwellings at the site (see pages 67-69 of document [HB06a](#)). A consultant has been employed by the Council to present an options appraisal to elected members which may mean the current proposed scheme could change. This was an increase from the site capacity of approx. 30 – 60 dwellings detailed in the Draft Masterplan (see page 116 of document [HB06b](#)).
 - c) Epsom Clinic and Ambulance Station site – A five storey 94 bed care home was approved by Planning Committee (at the time it was subject to a Section 106 agreement which has since been signed) on the former police and ambulance station site in 2023 and therefore the Masterplan has been updated to introduce a design for a scheme that could be implemented at the adjoining Clinic site. The revised design is for two blocks of apartments that will deliver up to 35 dwellings at the site (see pages 75-76 of document [HB06a](#)). This was an increase from the site capacity of approx. 16 dwellings detailed in the Draft Masterplan (see pages 67-69 of document [HB06b](#)).
 - d) Hope Lodge Car Park - a revised scheme has been included in the masterplan which is a higher density development consisting of apartments. This approach would deliver approximately 39 dwellings at the site (see pages 72-73 of document [HB06a](#)). This was an increase from the site capacity of approx. 20-25 dwellings detailed in the Draft Masterplan (see page 130 of document [HB06b](#)).
- 6.5 The three other opportunity sites were not amended in the final masterplan for the reasons set out below:
- a) Depot Road / Upper High Street Car Parks– No changes are proposed to the designs for this site which will provide approximately 100 dwellings and car parking to make more efficient use of this land whilst maintaining public car parking capacity.
 - b) Southern Gas Networks site – planning proposals for two of the three core land parcels at the site:
 - i. Majestic Wine and former Office Depot site – since the Draft Masterplan was prepared, planning consent has been granted (on appeal) for the redevelopment of this site to provide a self-storage facility. This permission is now under construction.
 - ii. SGN site – The developers published pre-application material on this site in July 2024 and a planning application was received late August for the comprehensive redevelopment of the SGN site

(Option 1 in the Masterplan). The proposals in the planning application are for a residential led redevelopment of the site (456 units) and the re-provision of the Laines Theatre Arts Building. The application was granted (subject to S106) in April 2025.

- iii. Hook Road Car Park - There are currently no live applications for the redevelopment of the Hook Road Car Park (which forms part of Option 2 of the Masterplan). However, the development proposals for the SGN site would enable the Hook Road Car Park site to be redeveloped as a later phase if they were to be approved.
- iv. Ashley Centre - The Ashley Centre submitted a comprehensive response to the Draft Masterplan in relation to potential development aspirations for the wider site, including land outside of the control of the Ashley Centre such as the Multi-Storey Ashley Centre Car Park and the Epsom Playhouse, both of which are owned and operated by the Council and are not available for redevelopment. The proposals for this opportunity site that focus on Global House and the frontage to Ashley Avenue (A24) were not amended.

Other Work streams

- 6.6 The core evidence document is the LAA 2024 which was updated following the LAA 2022. This updated version reflected the outputs of a 'call for sites' and the responses regarding availability that we received to multiple letters we sent to the landowners of sites that council officers had identified as having potential via a desktop review exercise.
- 6.7 The Development potential (capacity) of sites detailed in the LAA has been informed following a three-stage process:
 - Urban Site Visits - August 2023
 - Site Assessment Matrix development – standard density multipliers calculated for each site – October 2023
 - Meeting with DM to review capacities of all available urban sites having regard to constraints - (November 2023).
- 6.8 Further details on how the council has been proactive in seeking to identify additional supply and the approach taken in assessing development potential are contained in our response to Question 3.4 (Matter 2).
- 6.9 It is therefore considered reasonable and appropriate to hold constant the preferred development densities arrived at on the basis of this work because it examined the specific context of the sites and what would push the boundaries on density whilst being deliverable in planning terms having regard to character including heritage designations and assets. It is considered that higher densities would harm the urban fabric.

Q6.2 From reading the SA, I am not clear how the strategy on site selection to inform the reasonable alternatives has developed. Paragraph 4.1.5 states that the objective is to allocate a package of sites to meet needs and wider objectives. In terms of establishing growth scenarios, should the focus not be on alternative growth scenarios in the context of identified needs, rather than individual sites themselves?

- 6.10 The Sustainability appraisal has taken the approach of identifying growth scenarios in the context of identified needs from the outset. In developing reasonable alternatives the council has had regard to the SA Scoping Report (PV05) and other local plan evidence base.
- 6.11 As discussed at the Stage 1 hearings the Sustainability Appraisal effectively tests a low growth reasonable alternative (Scenario 1), a high growth reasonable alternative (Scenario 7) and then a series of variable mid growth scenarios in between, including three reasonable alternatives (Scenario's 3-5) that test different geographical distributions of development (or packages of sites) to meet varying levels of development needs as set out in Table 5.2 (p53) and Figure 5.9 (p54-55).
- 6.12 Scenario 7 is considered to be a reasonable high growth scenario even though total identified supply is only 62% of Local Housing Need. This is because, a scenario delivering a higher level of growth is considered to be manifestly unsustainable, as it would require the inclusion of Green Belt sites for development that have been ruled out in the Sustainability Appraisal (shown in Figure 5.8) for clear reasons which are defined in Section 5.4 of the Sustainability Appraisal and include:
- a) Green Belt and Landscape impact
 - b) The historic environment
 - c) Accessibility
 - d) Land ownership

Q6.3 Table 5.2 of document SD05a sets out the 6 reasonable alternative growth scenarios tested. It would appear that the only difference between scenario 1 and 2 is the addition of 100 dwellings – is this correct?

- 6.13 Yes, that is correct – the variable is Hook Road Arena which is proposed to deliver a new sports hub for the borough to meet identified needs for additional sports facilities, including playing fields as set out in the Playing Pitch Strategy (document reference [IS07](#)) in addition to approximately 100 residential dwellings as a form of enabling development on the southern part of the site.

Q6.4 What is the rationale for excluding the south sites (COL017, COL019, COL023) from growth scenario 4?

- 6.14 As set in response to Q6.2, the SA tests a low growth reasonable alternative (Scenario 1), a high growth reasonable alternative (Scenario 7) and then a series of variable mid growth scenarios in between. This includes three reasonable alternatives (Scenario's 3-5) that test different geographical distributions of development (as set out in Table 5.2) from sites that are identified to be progressed as variables (Figure 5.8).
- 6.15 These mid growth reasonable alternatives test the impact of focusing development on different geographical locations:
- Scenario 3 – South
 - Scenario 4 - East
 - Scenario 5 – West.
- 6.16 The rationale is therefore to test reasonable alternatives with varying geographical focus of development which essentially form 'alternative' mid growth scenarios.

Q6.5 What is the rationale for excluding the south (COL017, COL019, COL023) and East (Downs Farm) sites from growth scenario 5?

- 6.17 The same reasoning applies as set out in the response to Q6.4.

Q6.6 What is the explanation for the scoring attributed to scenario 7 in relation to the Historic Environment?

- 6.18 Scenario 7 is judged to perform relatively poorly because certain of the additional sites allocated under this scenario are constrained in historic environment terms. Section 5.4.25 explains that the Noble Park Extension / Hollywood Lodge site cluster is subject to significant constraint, notably that they lie within the Hospitals Cluster Conservation Area.

Q6.7 Section 7 of SD05a identifies that there is a missing scenario – whereby Down Farm is allocated in addition to Horton Farm – the document cross references to paragraph 6.15 however from reading this section, the only justification appears to be to keep the scenarios manageable and due to a lack of confidence that there would be a meaningful differentiation in terms of significant effects – is this the extent of the reasoning for not considering this as an alternative growth scenario?

- 6.19 Yes, as set out above, the SA tests a low growth reasonable alternative (Scenario 1), a high growth reasonable alternative (Scenario 7) and then a series of variable mid growth reasonable alternatives between them.
- 6.20 Is not proportionate to test every incremental reasonable alternative through the SA process given the importance of focusing attention on growth scenarios that can be meaningfully differentiated in terms of significant effects.
- 6.21 The Council in its statement at 7.2.1 (p51) of the SA states that '*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')*'. Therefore, the missing scenario is not considered to be meaningfully differentiable in terms of significant effects between the scenarios that it would sit between (scenarios 5 and 6) to warrant being tested as a standalone reasonable alternative.
- 6.22 However, should the Inspector consider it necessary, the Council will be willing to test the missing scenario.

Q6.8 Concerns have been raised regarding factual inaccuracies raised with the Council in October 2023 within the SA as well as inconsistencies between the SA and the site assessment methodology (see representation 163 Carter Jonas). Could the Council provide a full response to the concerns raised.

- 6.23 The response identifies 2 core issues which are detailed below:

Sustainability Appraisal and Site Assessment Consistency

- 6.24 The representation in question relates to Site NON013 (Land adjacent to Ewell East Station) where the SA correctly identifies that '*the land is currently used by two rugby clubs and, whilst the assumption is 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*'.
- 6.25 The SA goes on to state that '*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*' (5.4.48, p30)
- 6.26 The site selection methodology (document reference HB05) confirms that the freehold owner is promoting the site as being available and in the concluding comments states that '*part of site under long lease, other part under control of landowner. Loss of playing fields (reprovision required)*'.

- 6.27 We acknowledge that the information in terms of the control of the land could be seen as contradictory, specifically in relation to the amount of land under the control of the freeholder. It is important to note that the Council has not received any written evidence confirming that either leaseholder is willing to, or has, surrendered their lease to the freeholder, or that replacement playing pitch provision can be provided. The Sustainability Appraisal wording is therefore accurate.

Accuracy of the Playing Pitch Strategy

- 6.28 The Council's Playing Pitch Strategy (PPS) (document reference [IS07](#)) forms part of the Local Plan evidence base. The study carried out an assessment of current and future playing pitch needs through assessing supply and demand.
- 6.29 The applicant raises concerns about the accuracy of the PPS (dated October 2023), which are outlined below, along with the Council's response.

a) 'The quantity of rugby pitches recorded is incorrect. Sutton & Epsom Rugby Football Club (SERFC) hold a lease on 3.7 hectares of the site, of which approximately 3.6 hectares is usable space for sport (with the remainder comprising access, circulation space and perimeter landscaping). Within this area, there is capacity for three pitches and a small training area. It may be possible for SERFC to also provide junior and mini pitches, but this provision would be instead of, not in addition to, the three pitches.'

Council's response:

In relation to rugby and the Priest Hill Playing Field site (which is the subject of the Carter Jonas representation), the PPS identifies provision as being: 'three non-floodlit pitches, five junior pitches and five mini rugby pitches'. The provision of these pitches is spread across the Priest Hill site, which covers a wider area than the area identified by Carter Jones as being leased to Sutton and Epsom Rugby Club.

b) 'The assessment of the quality of the pitches appears to take no account of the other contributing factors that influence quality. It is significant to note that the Council requested the freeholder demolish the former pavilion at the northern end of the site (adjacent to the railway) as it had been vacant for some time and became a target for vandals and antisocial behaviour.'

c) 'In the context of the reduced number of pitches and the concerns regarding quality, it is necessary to downgrade the current capacity of the site.'

Council's response:

The methodology used to assess the carrying capacity of pitches is specified by the Rugby Football Union (RFU). The assessment of the quality of the pitches was based on a non-technical visual inspection during the playing

season, conducted by the experienced consultants who produced the PPS. The drainage and maintenance of the pitches were considered with the Priest Hill pitches being rated as 'standard' quality for both. It is not considered that the carrying capacity of the pitches identified within the PPS should be downgraded.

d) 'It is correct that the site has no changing facilities, but it is also significant that it also does not have any storage or any other facilities at all. It does not have any parking and the maintenance of the majority of the site beyond the playing pitch is sporadic. As such, the costs of provision of changing facilities for the site are not the only capital consideration. To provide adequate facilities for the three pitches would also require the provision of utilities, laying of a surface level car park and upgrading the access road within the site. A full package of works, noting that the costings identified for the pavilion alone are now dated, would be significantly greater than identified in the PPS.'

Council's response:

The PPS notes there are no changing facilities at the Priest Hill site. However, while the wider facilities of the site may not be ideal, the pitches are still in active use by Sutton and Epsom Rugby Club who have engaged in the PPS and require additional pitch capacity.

e) Priest Hill Playing Field is identified as 'being owned by Glyn School. This is incorrect as the site is owned by CCPL.'

Council's response:

It is acknowledged that site is incorrectly recorded in the PPS as being in the ownership of Glyn School.

Q6.9 Have the individual site allocations been chosen according to a robust site selection methodology?

6.30 Yes, we have followed a three-stage process:

6.31 Stage 1 - LAA – initial high level assessment of sites promoted for development in the borough through the call for sites process. The LAA incorporated a desktop review process to identify additional sites in the urban area that could have capacity to deliver development needs.

6.32 Stage 2 - Site Assessment Methodology 2024 (document reference [HB05](#)) in the examination library. Section 3 (methodology) explains how the assessment has been undertaken in as quantifiable fashion as possible, using GIS, constraints, existing planning policies and transport modelling (from the Regulation 18 Transport Assessment, document reference [IS06](#)) as a basis for assessment. Assessments for available sites have been augmented by in person site visits by officers to test assumptions. The council considers that

its methodology, which has had regard to work produced by other local authorities, is compliant with Planning Policy Guidance and the National Planning Policy Framework.

- 6.33 Stage 3 – the SA Report draws upon the work undertaken as part of Stage 2 in addition to other evidence base such as the Green Belt studies to define seven reasonable alternative growth scenarios, where each scenario comprises a package of sites where each package is considered ‘reasonable’ in light of the plan objectives having given consideration to:
- a) strategic factors (Section 5.2);
 - b) the varying merits of site options when viewed in isolation (Section 5.3); and
 - c) sub-area specific issues and options (Section 5.3).
- 6.34 The SA Report then appraises the seven reasonable alternative growth scenarios (Section 6) and, in light of the appraisal, the Council was able to reach a decision (Section 7) that Scenario 5 was best performing / best represented sustainable development on balance such that the Council was justified in taking Scenarios 5 forward as the basis for the Local Plan.

Q6.10 The PPG advises that, when preparing strategic policies, it may be concluded that insufficient sites / broad locations have been identified to meet objectively assessed needs, including the identified local housing need. It goes on to advise that strategic policy-making authorities will need to revisit their assessment, for example to carry out a further call for sites, or changing assumptions about the development potential of particular sites. This may include applying a range of densities that reflect the accessibility and potential of different areas, especially for sites in town and city centres, and other locations that are well served by public transport. Have the Council completed this exercise?

- 6.35 Please refer to the Council’s response to Q3.4 which provides details of how the council has carried out a call for sites exercise and taken a proactive approach to identifying additional land to meet development needs.
- 6.36 In addition, the response provides details of the three-stage approach to reviewing site densities of available sites in the urban area, including where relevant, the findings of the Epsom Town Centre Masterplan (see response to Q6.1 for further information).
- 6.37 The Council has applied varying densities to sites to reflect the site location (e.g. Town Centre, or Movement Corridor) to inform site capacities which are contained in Appendix M2a.

- 6.38 The densities allocated to the Green Belt sites vary dependent upon site specific constraints, however allocations SA32: Land at West Park Hospital North, SA33: Chantilly Way and SA35: Horton Farm will exceed 40 dwellings per hectare.

Q6.11 Have all reasonable alternatives been considered in terms of the spatial strategy, policies and sites including increases in density or the housing proposed over the plan period?

- 6.39 Yes, all reasonable alternatives have been considered in terms of the spatial strategy and sites. The legal requirement is to examine reasonable alternatives (RAs) taking account of “the objectives and geographical scope of the plan”.
- 6.40 The Local Plan objectives have therefore been key inputs into the SA process of defining reasonable alternatives. The nine objectives of the Local Plan (p16) have therefore all been considered in defining reasonable alternatives, specifically:

Objective 1 - To provide a sustainable level of housing growth. This will have regard to the borough's constraints whilst meeting future housing needs by identifying and maintaining a supply of land for housing. Housing will be the right size, type and tenure and will be in the right location. This will provide a choice of housing for people at all stages of life

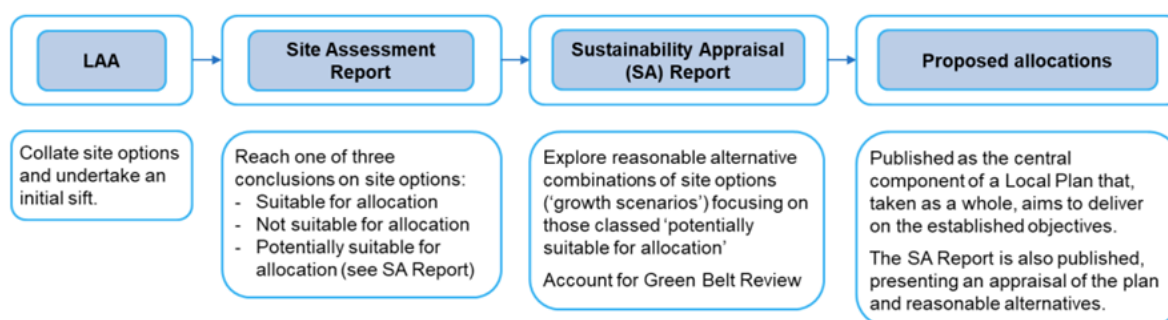
Objective 6 - To ensure that development does not have a detrimental impact on the borough's environmental assets including designated national sites, landscape character, water quality and biodiversity, and that new development provides opportunities to provide for biodiversity net gains.

- 6.41 The [Planning Advisory Service Guide to a better Sustainability Appraisal](#) makes it clear that it is important that the SA contains reasonable alternatives (or options) that would likely be chosen having regard to the objectives of the Plan and that the number of reasonable alternatives should be focused.
- 6.42 Having regard to the above, the Local Plan tests 7 reasonable alternatives ranging from a low growth scenario (Scenario 1) which has maximised the use of suitable and available urban sites, including by applying increased densities an includes applying densities / development and includes a limited amount of green belt land (two previously developed sites and poorly performing greenfield site) up to a high growth reasonable alternative (Scenario 7) which is essentially Scenario 1 with the inclusion an additional 9 green belt allocations.

- 6.43 Having regard to the Local Plan Objectives, the Council does not consider that additional options that promote a higher level of growth are reasonable alternatives as they would fail to deliver sustainable development when assessed against the 13 criteria set out in the Sustainability Appraisal.

Q6.12 Are the allocated sites identified at Chapter 4 of the Plan (Planning for Places) including the size and mix of uses proposed justified and in what way do they reflect the outcomes of the SA and testing of reasonable alternatives through the site selection methodology?

- 6.44 Yes, the allocated sites within Chapter 4 of the plan are justified. The allocation procedure has been thorough, informed by a variety of evidence and guided by the sustainability appraisal. The process as to how sites were identified, assessed and allocated within the Proposed Submission Local Plan is summarised in the diagram below.



- 6.45 The SA appraised 7 reasonable alternatives (scenarios), each scenario comprising sites that had been identified as being potentially suitable for allocation, through the LAA and Site Assessment process. This included Green Belt sites.
- 6.46 Following an assessment of the 7 scenarios against 13 sustainability topics, scenario 5 was considered to strike the optimal balance across competing sustainable development objectives. The Spatial Strategy and site allocations within the Proposed Local Plan reflect this scenario.
- 6.47 Given the limited availability of sites within the borough, the resulting allocations deliver a mix in terms of site size and the uses that will be delivered. The proposed strategy directs development first to the most sustainable locations, making the best use of previously developed land in the urban area. These sites are generally smaller in size and will mostly deliver higher density residential uses. The larger allocations, of which a number are greenfield sites currently located in the Green Belt, will deliver a greater range of uses and mix of units. This will include housing (including 10 gypsy and traveller pitches), a new sports hub, public park, supporting community infrastructure business incubation space.

- 6.48 The greenfield sites are also able to deliver a greater proportion of much needed affordable housing, demonstrated by the findings of the Local Plan Viability Assessment (document reference [EV04](#)) and Viability update note (document reference [EV03](#)).

Q6.13 Does the evidence demonstrate that there is a realistic prospect that each of the allocations will be deliverable within the Plan period? If this is not the case, is the allocation justified?

- 6.49 The Council has engaged with site promoters to ensure that only those sites that are deliverable over the plan period have been included within the local plan, this has included confirmation that the site is available for development from the freeholder.
- 6.50 Following the Local Plan being presented to committee in November 2024, the council has continued to engage with site promoters to understand availability and deliverability of sites. Recent correspondence has indicated that four of the smaller sites in the urban area are unlikely to be delivered in the first five years of the plan period and therefore we consider the following site allocations could be removed from the plan as schemes of this size beyond the first five years of the plan period will be captured by the windfall allowance for schemes of between 5 and 19 units contained within the Local Plan:
- SA24 – Garages at Somerset Close & Westmorland Close – 6 dwellings
 - SA25 – 64 South Street Epsom – 6 dwellings
 - SA26 – 35 Alexandra Road – 8 dwellings
 - SA28 – 63 Dorking Road – 6 dwellings
- 6.51 Further information on the reasoning for the sites being recommended for removal is contained in our response to Q13.1, on the page for that specific site allocation.

Q6.14 With regards to the sites that will be delivering in years 1-5 of the Plan period, are the timescales identified justified by the evidence base?

- 6.52 Yes – sites within the trajectory as delivering in the first five years are still expected to deliver in the first five years of the plan period, except for the four sites detailed in response to Q6.13 above. A revised trajectory has been prepared to reflect the latest position (Appendix M2b).

Q6.15 With regards to the methodology for the selection of sites to be included within the Plan, is it clear why the sites listed at appendix 5 of HBO1a have been discounted?

- 6.53 Yes, we consider it is clear why the sites listed in Appendix 5 of the LAA 2024 have been discounted.
- 6.54 Appendix 5 of the LAA ([HB01a](#)) details all the sites that have been discounted because they are 'too small to accommodate 5 or more dwellings'. Here we have separated the list of sites discounted first by stages, with Stage 1 (too small) shown in Appendix 5.1-5.3, and then at Stage 2 (for various reason including availability and suitability) shown in Appendix 5.4.
- 6.55 For the sites discounted at Stage 1 (for being too small) we have separated these into 3 tables by their 'source'; that is, 'desktop review', 'planning applications' (includes pre-applications) or 'call for sites'.
- 6.56 Appendix 5.4 lists sites that were discounted at Stage 2. That is, *they are likely to accommodate 5 or more dwellings* but are *typically not available nor suitable* for development.
- 6.57 There is a specific reason why each site listed in Appendix 5 has been discounted and this is clearly detailed in the second to last column of each table in Appendix 5, pp 22-29 of the 2024 LAA (document reference [HB01a](#)).

Q6.16 Of the sites discounted at stage 2 (listed within appendix 5.4, page 25 of HB01a) did the Council contact the owners of these sites as part of a further call for sites? Where the evidence states 'site not available' can the Council explain what steps they have undertaken to reach that conclusion?

- 6.58 Yes, we contacted owners of these sites detailed in Appendix 5.4 to encourage them to submit their site through the call for sites process (call for sites forms were provided with the letters sent to freehold owners).
- 6.59 Referring specifically to Appendix 5.4 of the LAA, if the site was discounted for the reason 'site not available', site owners' details were obtained from HM Land Registry, and the freehold owner(s) were sent letters on three separate occasions to ascertain availability. The first letter sent in February 2022, a follow up in July 2022, and final letter in March/April 2023.
- 6.60 There are sites in this list (Appendix 5.4) which are garage sites and have the following reason for discounting: "*availability concerns (garages under multiple freehold and leaseholds; not available)*". We wrote to the freeholders of these sites on three separate occasions, on the dates outlined above.

- 6.61 Therefore, the council has proactively sought to identify sites, having dedicated resources to undertaking HM Land Registry searches to obtain up to date contact details for site owners and writing to the site owners on multiple occasions.

Q6.17 As I understand it, the Plan has been submitted under the transitional arrangements set out at paragraph 234 of the Framework. Is this correct? If it is correct, what is the purpose of paragraph 4.6-4.23 of EV03 which appear to set out how that plan making has been effected by the new Framework?

- 6.62 It is correct that the Local Plan has been submitted under the transitional arrangements so that is assessed against the December 2023 version of the NPPF.
- 6.63 The purpose of paragraphs 4.6 - 4.16 of the Viability Update Note (document reference [EV03](#)) is to provide a summary of the core changes to the NPPF that impact viability considerations at the decision-making stage from the date of its publication and updates on other national proposals such as changes to building regulations and the status of these. However, we acknowledge that they have limited relevance to the Examination of the Local Plan which as noted above is being examined against the December 2023 version of the NPPF.

Plan Viability

Issue 7: Does the viability evidence which supports the Plan demonstrate that the plans policies are viable and does the IDP explain what infrastructure will be required and when?

Questions:

Q7.1 Has the viability assessment been prepared in accordance with national policy and guidance?

- 7.1 Yes. The *2022 Local Plan Viability Assessment* (HDH, January 2023) (document reference [EV04](#)) was prepared by HDH, a firm of Chartered Surveyors specialising in such work.
- 7.2 The purpose of the Local Plan Viability Assessment (LPVA) was to consider and inform the development of the Local Plan and, to assess the cumulative impact of the policies on the planned development. HDH Planning & Development were first instructed in the summer of 2019 to support the Council in progressing its Local Plan.
- 7.3 There are several sources of Guidance, the primary guidance being that set out in the Viability sections (Chapter 10) of the PPG. The requirements of the PPG are reviewed in Chapter 2 of the LPVA. Whilst the PPG does not specify a step by step approach, it does provide useful guidance on the general approach.
- 7.4 In essence the PPG formalises the use of the EUV Plus approach.
- 7.5 It is based on modelling a set of 30 typologies (see Table 9.1). These typologies are representative of the type of development that is anticipated to come forward in Epsom and Ewell over the plan-period. These range from large scale flatted schemes through to smaller greenfield sites. In addition, 10 potential strategic sites were modelled (see Table 9.2). A range on non-residential uses were also modelled.
- 7.6 Paragraphs 10-010-20180724 to 10-019-20190509 of the PPG sets out how the inputs to the viability assessment should be derived (i.e. standardised inputs). As set out through the LPVA this approach has been followed in full.
- 7.7 In addition, to the above, as HDH is a firm of Chartered Surveyors, and is therefore a firm regulated by the RICS, they are required to follow the RICS' guidance (it is mandatory). There are two principal pieces of relevant RICS guidance being the *Financial viability in planning: conduct and reporting*

RICS professional statement, England (1st Edition, May 2019) and *Assessing viability in planning under the National Planning Policy Framework 2019 for England, GUIDANCE NOTE* (RICS, 1st edition, March 2021). As set out from 1.17 of the LPVA the work has been undertaken as per the RICS Guidance.

- 7.8 The LPVA also follows the *Viability Testing in Local Plans – Advice for planning practitioners* (LGA/HBF – Sir John Harman) June 2012 (known as the Harman Guidance). Whilst this predates the significant updating of the viability sections of the PPG in 2018, the changes to the PPG, brought the PPG more in line with the Harman Guidance.
- 7.9 In following, the various sources of guidance, the values of market housing (including specialist older people's housing and student housing) were researched, based on published data sources, price paid data from the Land Registry and asking prices of newbuild and existing homes. The values of affordable housing were also derived. The values of non-residential uses are also researched, as were land values. The land value research was informed by the prices paid (from the Land Registry) for recently approved schemes.
- 7.10 The detail of the residential research is set out in Chapter 4 of the LPVA, the details of the non-residential research is set out in Chapter 5 of the LPVA and the details of the land value research is set out in Chapter 6 of the LPVA.
- 7.11 The costs of development were estimated, as per the Standardised Inputs set out in the PPG. The costs of construction were based on the BCIS costs, and allowances made for site costs, abnormal costs, contingencies, fees, finance costs etc. An allowance was also made for developer's return (i.e. profit) which is treated as a cost in the appraisals.
- 7.12 The purpose of the LPVA was to consider and inform the development of the Local Plan and, to assess the cumulative impact of the policies on the planned development. The impact of the policies in the emerging plan were considered in Chapter 8 of the LPVA.
- 7.13 An important aspect of the assessment was to consider development's ability to bear the costs of strategic infrastructure and mitigation. CIL is an important source of funding, the costs of CIL were treated as a cost in the appraisals. A further allowance for developer contributions was also made s106 – typologies £2,500/unit and Strategic Sites £25,000/unit.
- 7.14 Sets of appraisals were run, and through an iterative process the policy requirements were developed.

- 7.15 As set out in Chapter 10 of the LPVA, this was caveated as on this basis, not all development is viable. The LPVA noted that the Council should be cautious in assuming High Density flatted development or Build to Rent development would come forward, as these are not likely to be delivered.
- 7.16 A LPVA is based on a series of estimates and assumptions the impact of changes in costs and values were assessed (Appendix 18 of the 2022 LPVA and Appendix 1 of the 2024 Viability Note (document reference [EV03](#)).
- 7.17 In summary, the LPVA has been prepared in line with the requirements of the NPPF and PPG. Its preparation included informal technical consultation and then was subject to formal consultation through the Regulation 18 process.

Q7.2 Have all the necessary policy requirements been taken into account?

- 7.18 Yes. The initial (unpublished) *2020 Local Plan Strategic Viability Assessment (including CIL Review)* (HDH, March 2020) included the testing of a broad range of policy options. These were considered individually and then cumulatively and the finding fed into the development of the Local Plan and informed the drafting of policies and enabled members to understand how policy costs related to each other. The further developed policies were then tested in the *2022 Local Plan Viability Assessment* (HDH, January 2023) (document reference [EV04](#)).
- 7.19 The costs of the separate policy requirements were considered in the 2022 LPVA with the separate policy costs being set out in Chapter 8. Appraisals were run (Chapter 10), in particular considering how the costs of developer contributions, affordable housing (amount and tenure mix) and climate change (zero carbon) impact on viability. The analysis came together from paragraph 10.31 of the 2022 LPVA. The 2022 LPVA suggested the following policy mix (12.73):
- Affordable Housing Greenfield sites 40%, all other sites 30%.
 - 10% of all the homes as affordable home ownership (33% at 30% and 25% at 40%).
 - First Homes 25% of affordable housing.
 - Affordable housing for rent as 50% Affordable Rent / 50% Social Rent.
 - Design
 - 90% Accessible and Adaptable – Category 2,
 - 10% Wheelchair Accessible, NDSS
 - Water efficiency / Car Charging Points,
 - 2025 Pt L Energy measures.
 - Additional steps towards Zero Carbon on greenfield sites.

7.20 Some further updates were then considered in section 5 (Updated Policies in the Regulation 19 Submission Draft Plan) of the 2024 Viability Note (Paragraph 7.6) (document reference [EV03](#)):

- Biodiversity Net Gain is assumed at 20% (on the greenfield sites), based on a cost of 150% of implementing 10% BNG.
- The Net Zero cost assumption has been updated to align with those derived in the Surrey Net Zero – Economic Viability Assessment, Assessment of policy delivery – (Three Dragons, May 2024) report (document reference [OTO06b](#)).
- The indexed rates of CIL are updated.
- The affordable housing mix is updated to reflect the Council's preference is for all Affordable Home Ownership housing to be delivered as Shared Ownership rather than First Homes and for half of the affordable housing for rent to be Social Rent.

7.21 To conclude all necessary policy requirements have been viability tested.

Q7.3 To what extent does the evidence base demonstrate that the requirements of policy S6 concerning the delivery of affordable housing are viable?

7.22 Policy S6 seeks 40% affordable housing on greenfield sites, 30% on brownfield sites, and for the affordable housing to be delivered as 70% affordable housing for rent (50% Social Rent – 50% Affordable Rent) and the balance (30%) as Affordable Home Ownership.

7.23 The updated appraisals summarised in Appendix 1 of the 2024 Viability note (document reference [EV03](#)) test the requirements of Policy S6. Most typologies, with the exception of taller buildings (6 stories plus) and Build to Rent derive a Residual Value that is greater than the Benchmark Land Value, however we do not envisage many buildings of this type to be constructed in the borough.

7.24 Appendix M5a contains a summary of the allocations contained within the Local Plan and the typology (or typologies) that that most closely relate to and demonstrates that all sites will be viable with the exception of:

- a) SA1, which benefits from planning permission (subject to a s106) and will be delivering a lower level of affordable housing following an open book viability assessment. A significant abnormal cost for the development of this site is land contamination.

- b) SA2, which adjoins SA1 (detailed above) and will deliver higher density flatted development (approx. 8 stories). The two land owners are engaging as set out in the response to Q13.13.

7.25 This identifies that most local plan allocations will be viable once policy requirements have been met.

Q7.4 What has been used to inform the typologies selected and are these reflective of the growth planned within the borough?

7.26 The modelling in the 2022 LPVA (document reference [EV04](#)) is based on modelling a set of 30 typologies (see Table 9.1). These typologies are representative of the type of development that could come forward in Epsom and Ewell over the plan-period. These range from large scale flatted schemes though to smaller greenfield sites. In addition, 10 potential strategic sites were modelled (see Table 9.2). A range on non-residential uses were also modelled (detailed in Chapter 5, pages 75-86).

7.27 The modelling is in line with the wider policy requirements to make efficient use of land whilst having to other contextual matters that impact density / site capacity as set out in the LAA (document reference [HB01a](#)).

7.28 Appendix M5a contains a summary of the allocations contained within the Local Plan and the typology (or typologies) that most closely relate to and demonstrates that all sites will be viable with the exception of:

- c) SA1, which benefits from planning permission (subject to a s106) and will be delivering a lower level of affordable housing following an open book viability assessment. A significant abnormal cost for the development of this site is land contamination.
- d) SA2, which adjoins SA1 (detailed above) and will deliver higher density flatted development (approx. 8 stories). The two land owners are engaging as set out in the response to Q13.13.

Q7.5 In what way does the viability work reflect the requirements of policy S15?

7.29 Policy S15 aligns the Local Plan with National Policy, seeking 10% Biodiversity Net Gain (BNG) from eligible developments in the borough, unless a requirement for 20% BNG is specified in a site allocation policy. The allocations where this would apply are allocations SA33, SA34 and SA35 which are all greenfield allocations.

7.30 The approach to the modelling is set out from paragraph 8.16 of the 2022 LPVA (document reference [EV04](#)) and was then updated as set out from paragraph 5.2 of the 2024 Viability Note (document reference [EV03](#)).

7.31 The modelling is assumed provision of BNG will be on-site on greenfield sites and off-site on brownfield sites (8.22). The costs of provision are taken from the Government's Impact Assessment^[1] (the percentage costs are used due to passing of time). The analysis was further informed by research by Kent County Council^[2].

7.32 The more recent *Viability Assessment of Biodiversity Net Gain in Essex Final Report Essex County Council and Essex Local Nature Partnership* (SQW, Temple, August 2024) sets out the following costs – which, again is adjacent to London:

Typology	Site size (Ha)	Total Costs 10% BNG			Total Costs 20% BNG onsite (where possible)			Total Costs 20% BNG offsite		
		Site	Per ha	Per Unit	Site	Per ha	Per Unit	Site	Per ha	Per Unit
5000 Unit Greenfield	285.71	£2,470,000	£8,645	£494	£2,858,500	£9,998	£571	£3,627,403	£12,696	£725
100 Unit Greenfield	2.94	£74,150	£25,221	£742	£90,050	£30,629	£901	£90,050	£30,629	£901
500 Unit Brownfield	13.89	£38,256	£2,754	£77	£51,756	£3,726	£104	£66,640	£4,798	£133
25 Unit Brownfield	0.28	£11,545	£44,404	£462	£24,145	£92,865	£966	£11,595	£44,596	£464
Small Industrial	0.125	£248	£1,984		£248	£1,984		£448	£3,584	

Source: Table 6-2: Delivery costs for 10% and 20% net gain. *Viability Assessment of Biodiversity Net Gain in Essex Final Report Essex County Council and Essex Local Nature Partnership* (SQW, Temple, August 2024).

7.33 The report concludes:

- A shift from 10% to 20% BNG will not materially affect viability in the majority of instances when delivered onsite or offsite.
- The biggest cost in most cases is to get to the mandatory, minimum 10% BNG. The cost increase to 20% BNG is, in most cases, much less and is generally small or negligible. Based on our scenario testing we estimate that:
- the additional cost of achieving 20% BNG ranges from £2 -£27 per residential unit on brownfield sites¹ and from £77 to £308 per residential unit on greenfield sites.
- this additional cost would impact residual land values by <0.1% for brownfield development land and <1.4% for greenfield development land.

- e) *Because BNG costs are low when compared to other policy and development costs, in very few cases are they likely to be what renders development unviable for BNG policy of up to 20%.*

7.34 This more recent research is consistent with the earlier Kent work, providing confidence that the viability assumptions are robust.

7.35 The requirement for 20% BNG on the specified greenfield sites is not anticipated to adversely impact on the proposed allocations' capacity and has been considered when estimating site capacity.

The IDP

Q7.6 I note that document COUD_001 lists key infrastructure at table 5 – the timescale column as indicated is in my view too vague. Document IS01 summarises infrastructure requirements over the plan period. However, it is not clear from the items listed when they are expected to be delivered over the plan period. Please could the Council provide greater clarity in relation to the infrastructure required over the plan period, and when this is expected to come forward. The Council can do this by setting out what infrastructure is expected to come forward during years 1-5, 6-11 and 11 plus of the Plan period, relating this to the housing trajectory at appendix 2 and how this relates to the site allocations proposed by the Plan.

7.36 To respond to this question, the Council has consulted with infrastructure providers to factually update the Infrastructure Delivery Plan, Regulation 19 (document reference IS01) and provide further detail on the delivery of infrastructure over the plan period. The resulting updated IDP is available in Appendix M5b, which now includes an Infrastructure Schedule as Appendix 1 to the document. This is reproduced below and provides greater clarity in relation to the infrastructure required over the plan period and when it is expected to come forward.

Ref	Infrastructure Type	Scheme Details and allocation(s) it supports (where applicable)	Timeframe for Delivery	Estimated Cost	Potential Source of Funding
E1	Education	Additional Early Years Provision at site allocation SA35 .	Years 6-10. Subject to demand at the time site allocation is delivered.	TBC	S106 developer contributions
E2	Education	Additional Early Years Provision across the borough.	Across all years. Subject to demand across the plan period.	TBC	Private sector Central government funding
T1	Transport	Bus Service Improvements (contained in Bus Service Improvement Plan).	Years 1-5.	TBC	TBC
T2	Transport	Ewell Village Public Realm Improvements.	Years 1-5.	£2.6 million	£1,250,000 CIL contributions
T3	Transport	B284 Ruxley Lane, Ewell. Road safety scheme.	Years 1-5. (subject to CIL funding)	£350,000	SCC road safety engineering budget and potential CIL funding.
T4	Transport	Range of RoadSafe Vision Zero Road safety schemes, including Road safety outside schools schemes, Road Safety and Speed management schemes.	Years 1-5.	£70,000+ £100,000+ longer term	SCC/Active Travel England Vision Zero Capital Investment Programme
T5	Transport	Langley Vale to Epsom town centre, Epsom Downs – pedestrian route improvements.	Years 1-5.	£300,000	SCC Countywide Integrated Transport Scheme budget.
T6	Transport	Improved E9 bus service to serve site allocation SA35 .	Years 6-10.	TBC	S106 developer contributions

Ref	Infrastructure Type	Scheme Details and allocation(s) it supports (where applicable)	Timeframe for Delivery	Estimated Cost	Potential Source of Funding
T7a	Transport	Schemes identified through the LCWIP (Local Cycling and Walking Infrastructure Plan). Currently areas and prioritised corridors are identified in the LCWIP Level 1.	Across all years. Linked to development being undertaken in proximity to prioritised corridors.	Estimated cost of cycle improvements: £65,280,000. Estimated cost of proposed walking improvements: £49,970,000.	Government funding such as the Active Travel Fund S106 developer contributions CIL contributions
T7b		Feasibility testing and scheme identification is underway.	Years 1-5. A CIL bid has been submitted to support detailed design and construction of early feasible priority LCWIP schemes.	Forecast cost of £3.4 million for this first project.	
T8	Transport	Local Street Improvements (LSI). Within the borough 19 Zones have been identified.	Across all years. Linked to development being undertaken in an LSI zone	The cost of delivering LSI measures is estimated to be approx. £1.5m per zone.	Government funding such as the Active Travel Fund S106 developer contributions CIL contributions
H1	Health	Reconfiguration - Cox Lane.	Years 1-5	£100,000	S106 Developer Contributions/CIL contributions
H2	Health	Reconfiguration of space for GP use - Bourne Hall.	Years 1-5	£360,000	S106 Developer Contributions/CIL contributions
H3	Health	Primary care facility at Horton Farm (site allocation SA35) or an equivalent financial contribution towards off-site	Years 6-10 Occupation trigger point.	TBC	S106 developer contributions.

Ref	Infrastructure Type	Scheme Details and allocation(s) it supports (where applicable)	Timeframe for Delivery	Estimated Cost	Potential Source of Funding
		provision of new or improvement to existing health facilities.			
H4	Health	Reconfiguration/extension - Old Cottage.	Years 6-10.	£500,000	S106 Developer Contributions/CIL contributions
H5	Health	GP practice extensions / redevelopment / reconfiguration as needed to create additional healthcare capacity.	Across all years. Dependent on need.	TBC	S106 developer contributions CIL contributions
U1	Utilities	Upgrade of storm tanks at Hogsmill Sewage Treatment Works.	Years 1-5.	N/A	Thames Water
U2	Utilities	Upgrade of the Hogsmill Sewage Treatment Works.	Years 6-10 and 11+ Thames Water identify delivery between 2030 and 2050.	N/A	Thames Water
SL1	Sports and Lesure	New sports hub for the borough to include playing pitches (grass and artificial), a new pavilion and changing facilities. Provision at site allocation SA34.	Years 6-10 and 11+	TBC	Enabling development/CIL contributions
ES1	Emergency Services	Surrey Police - ANPR system on key highway routes.	Years 1-5.	£72,000	CIL contributions
ES2	Emergency Services	Surrey Police - Additional Fleet Vehicles to support population.	Across all years.	TBC	Council tax receipts Government grants