

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

SA Report Addendum

April 2026

Quality information

Prepared by

Checked by

Verified by

Approved by

Mark Fessey
Associate Director

Prepared for:

Epsom and Ewell Borough Council

Prepared by:

AECOM Limited
Aldgate Tower
2 Leaman Street
London E1 8FA
United Kingdom
aecom.com

© 2026 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ("AECOM") in accordance with its contract with Epsom and Ewell Borough Council (the "Client") and in accordance with generally accepted consultancy principles and the established budget. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

Table of contents

1	Introduction.....	1
2	Scope of the current consultation	2
3	The SA scope	6
Part 1: What has plan-making / SA involved up to this stage?		7
4	Introduction to Part 1	8
5	Defining growth scenarios	8
Part 2: What are the appraisal findings at this stage?		21
6	Introduction to Part 2	22
7	Growth scenarios appraisal	22
Part 3: What are the next steps?		39
8	Examination in public.....	40

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 Addendum

- 1.3.1 The SA Report was published alongside the proposed submission version of the Local Plan in December 2024 and then submitted alongside the Local Plan in March 2025. The appointed Planning Inspector then oversaw examination hearings in August and September 2025, before a post hearings letter was published on 22nd October 2025. Further work was then undertaken (see documents submitted to the examination on 22nd January 2026) before a further post hearings letter was received from the Inspector on 12th February 2026, essentially confirming a need for the Council to identify additional site allocations. The aim would be to 'boost' housing land supply and, in turn, enable a boost to the housing requirement, which is the number of homes that the Local Plan commits the Council to delivering over the plan period.
- 1.3.2 Work to consider potential additional site allocations has now been completed and is published for consultation. **This SA Report Addendum** aims to inform the consultation by presenting an appraisal of 'reasonable alternative' approaches to boosting supply, i.e. alternative combinations of new allocations.

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, specifically: Section 2 introduces the scope of the current consultation; and Section 3 introduces the SA scope.

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, 2023). 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 Scope of the current consultation

2.1 Introduction

2.1.1 The aim here is to further introduce the key task at the current time, namely exploring options for boosting housing land supply and, in turn, the housing requirement. This section covers:

- The Submission Local Plan
- Work completed post hearings
- Key parameters at the current time

2.2 The Submission Local Plan

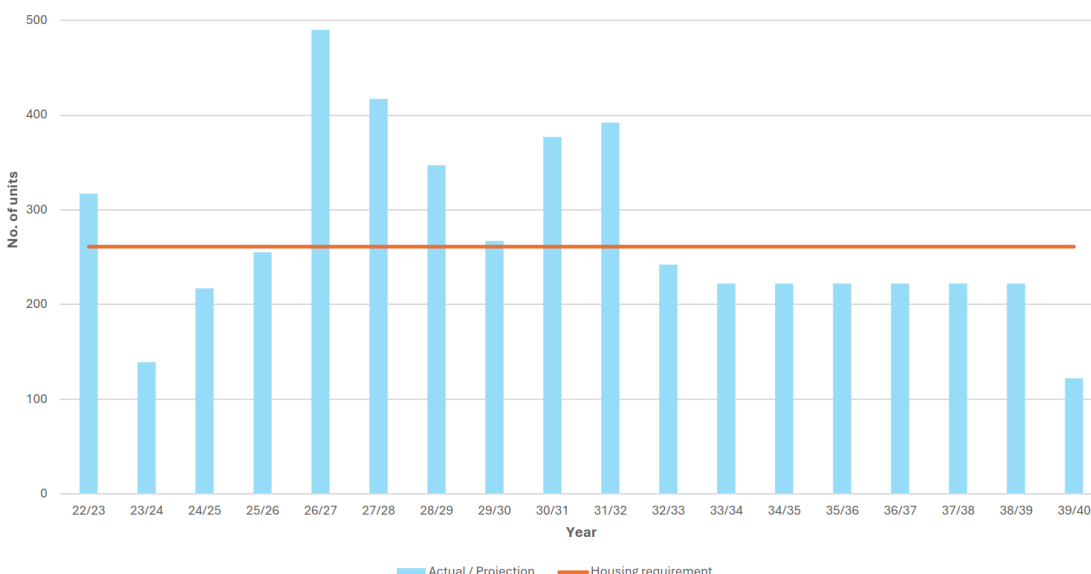
2.2.1 Section 3 of the Submission Local Plan explained that:

- The plan period is 2022 to 2040.
- Local Housing Need (LHN) over this period is 10,242 homes on the basis of the 2023 version of the Government’s standard method, which provides a figure of 569 dwellings per annum (dpa).
- The proposed housing requirement is 4,700 homes in light of LHN and wider factors including the London Green Belt as a constraint to growth and wider suitability issues with available supply options.
- The identified housing land supply is 4,914 homes, i.e. such that there is a modest supply ‘headroom’ over-and-above the housing requirement with a view to ensuring that the housing requirement can be delivered in practice, which is particularly important for the earlier years of the plan period (Figure 2.1).
- The identified housing land supply in the Submission Local Plan comprises: completions (2022/23 to 2023/2024) = 456 homes; permissions = 600 homes; a windfall assumption = 862 homes; urban allocations = 1,416 homes; and Green Belt allocations (2 x brownfield and 3 x greenfield) = 1,580 homes.

2.2.2 The implication of a housing requirement set below LHN is unmet housing need, which must then ideally be provided for by one or more neighbouring local authorities. However, in practice there is no established potential for any unmet need generated by the Epsom and Ewell Local Plan to be provided for elsewhere.

2.2.3 The Council sought to justify unmet need (10,242 - 4,700 = 5,542 homes) on the basis of detailed work prior to submission, including consultation on a Draft Local Plan in 2023 and consideration of reasonable alternative ‘growth scenarios’ through the SA process. However, in light of representations made to the examination the Inspector has now given a clear direction on the need to boost the housing requirement.

Figure 2.1: The housing trajectory as presented in the Submission Local Plan (2025)



2.3 Work completed post hearings

2.3.1 Following receipt of the first post hearings letter on 22nd October 2025 the Council responded in a letter dated 6th November 2025, which committed to two key workstreams aimed at demonstrating the potential to boost supply and then, in turn, informing the consideration of additional site allocation options:

- A review of discounted urban sites
- An updated to the Green Belt Topic Paper

Urban sites

2.3.2 Prior to submission 54 urban sites were discounted (i.e. not proposed for allocation) solely on the basis of the landowner not having confirmed availability. Concerns were raised with this approach during the hearings and then the Inspector's post hearings letter directed the Council as follows:

“Given the significant extent of unmet housing need within the borough, I request that the Council revisit these 54 discounted sites and repeat the... assessment exercise undertaken to see if any of these sites could fall within the definition of developable as identified by the Framework.”

2.3.3 The initial outcome of this exercise was presented in examination document COUD_020 (Feb 2026), which identified 13 additional sites as potentially 'developable' in that they are suitable for allocation and there is a 'reasonable prospect' that they will be available and can be viably developed in the plan period.

2.3.4 COUD_020 explained that total additional supply from these 13 sites is 193 homes and most are expected to deliver in years 11 to 15 of the plan period, although three small sites are expected to deliver in years 6 to 10. Subsequent work has examined these 13 sites in further detail, as discussed further below.

Green Belt sites

2.3.5 The post hearings letter explained the following in respect of the submitted Green Belt Topic Paper:

“During the Matter 4 hearing session, it became clear that there are a number of shortcomings... These shortcomings relate to the assessment of the individual sites for release in relation to the criteria the Council have identified. Specifically, a number of the conclusions drawn are inconsistent with the evidence presented, the extent to which mitigation measures have and have not been taken into account in relation to individual sites is neither clear or consistent, there are errors in the way individual sites have been assessed and I also have concerns regarding the consistency of approach to the individual site assessments contained within the document. As a result, I am unable to conclude at this stage whether the Council have done enough through this exercise to address the acute housing needs of the borough.

In order to address this, we agreed that the Council should revisit this part of the evidence base to ensure that all of the sites contained within the report have been assessed in a consistent manner, in accordance with the methodology identified within the evidence.”

2.3.6 In response the Council prepared a Green Belt Topic Paper Updated (COUD_021) which presents a consistent proforma assessment of the complete long-list of Green Belt options that are potentially in contention for removal from the Green Belt through the Local Plan. Specifically, this comprises:

- 7 existing major developed sites.²
- 5 sites that are proposed allocations within the Submission Local Plan (2 x brownfield and 3 x greenfield), which are sites proposed to be removed from the Green Belt to deliver 1,580 homes.
- 21 sites not proposed for allocation within the Submission Local Plan ('omission sites'), i.e. where the proposal at the time of submission was that these sites should remain in the Green Belt.

2.3.7 Each of the site proformas presents an assessment under the following criteria:

² The Policies Map accompanying the Submission Local Plan proposed to inset 6 of these 7 sites, namely all bar Epsom College, where there remains an outstanding question as to whether the site should be inset (either in full or in part). However, regardless of the decision ultimately taken in respect of inseting, none of these 7 existing major developed sites have potential to deliver significant additional housing supply in the plan period, hence they need not be considered further in this report.

- Previously developed land (PDL) – the extent of PDL is recorded for each site in light of paragraph 147 of the NPPF (2023), which states that: *“Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport...”*
 - Accessibility / public transport connectivity – again in light of para 147 of the NPPF (2023).
 - Harm to the Green Belt – this is the first of two ‘Calverton Tests’ applied. The aim is to consider the sensitivity of the site in terms of Green Belt Purpose A (unrestricted sprawl of large built-up areas), Purpose B (merging of towns) and Purpose C (encroachment on the countryside).
 - Potential to mitigate harm to the Green Belt – this is the second of two ‘Calverton Tests’ applied. It involves giving consideration to the nature of any development scheme that would likely come forward, were the site to be allocated, including accounting for site promoter proposals.
- 2.3.8 The Topic Paper ends with a concluding table which presents a summary of performance against each of the criteria. As part of this an overall conclusion is reached on whether: A) the Calverton Tests are passed, which is a strong indication that there may be exceptional circumstances to warrant allocation subject to further consideration of wider suitability factors; or B) the Calverton Tests are failed such that it is difficult to envisage demonstrating exceptional circumstances regardless of wider factors.
- 2.3.9 Focusing only on the 21 omission sites, the conclusion reached is that 14 pass the Calverton Tests and so warrant being a focus of attention as part of work to boost supply. However, the 7 that fail the Calverton Tests cannot be entirely discounted before considering wider factors, i.e. it could feasibly be that wider factors are such that there is a case for allocation despite harm to the Green Belt that cannot be mitigated.

2.4 Key parameters at the current time

- 2.4.1 The aim is to consider whether additional sites can be allocated through modifications to the Local Plan to boost supply so as to enable an increased housing requirement and, in turn, a reduced level of unmet housing need. The Inspector has referred to the housing need situation as ‘acute’ but has not stated that the housing need necessarily be set at LHN (such that there is not any unmet need).
- 2.4.2 A first port of call is the list of 13 additional urban sites, but total supply from these sites is modest, such that attention focuses firmly on options for boosting supply via allocation of Green Belt omission sites. In particular, and as discussed, attention focuses on the 14 omission sites that pass the Calverton Tests.
- 2.4.3 The Calverton Tests are an important starting point, but there is also a need to consider wider suitability factors. In this regard, a first port of call is consideration of any onsite PDL and also performance in transport / accessibility terms, in line with para 147 of the NPPF (2023), but there are also wider suitability factors that can affect sites. Also, there are in-combination suitability considerations, i.e. a site might be considered suitable for allocation when viewed in isolation but not when viewed in combination with others (e.g. due to highway capacity concerns), and vice versa (e.g. because sites in combination could deliver an infrastructure upgrade). Wider suitability factors were considered through site assessment workstreams and the SA process prior to submission, and that work remains relevant at the current time.
- 2.4.4 Two final key parameters at the current time are as follows:
- There is an urgent need to adopt a Local Plan because the current Local Plan is ‘out-of-date’ such that the presumption in favour of sustainable development applies when deciding planning applications relating to the provision of housing (see NPPF para 11). Specifically, the Local Plan is out-of-date on the basis of the Council being unable to demonstrate a five-year housing land supply, as measured against the housing requirement, which is 832 dpa in line with the latest standard method because the adopted Local Plan is more than five years old (having been adopted in 2007). Furthermore, because of poor performance against the Housing Delivery Test there is a need to apply a ‘20% buffer’ as part of the five-year housing land supply calculation, and the outcome is that the Council can demonstrate a housing land supply of only c.1.5 years. The implication of ‘the presumption’ applying (strongly) is that any Planning Inspector deciding an appeal for a refused planning application will apply a ‘tilted balance’ in favour of granting permission with the aim of improving the housing land supply position. Also, for any application in the Green Belt the Inspector will consider whether the site is ‘grey belt’, which is a new designation introduced through the 2024 NPPF, with the context being that new housing on grey belt sites is ‘not inappropriate’ development in the Green Belt provided certain other criteria are met.

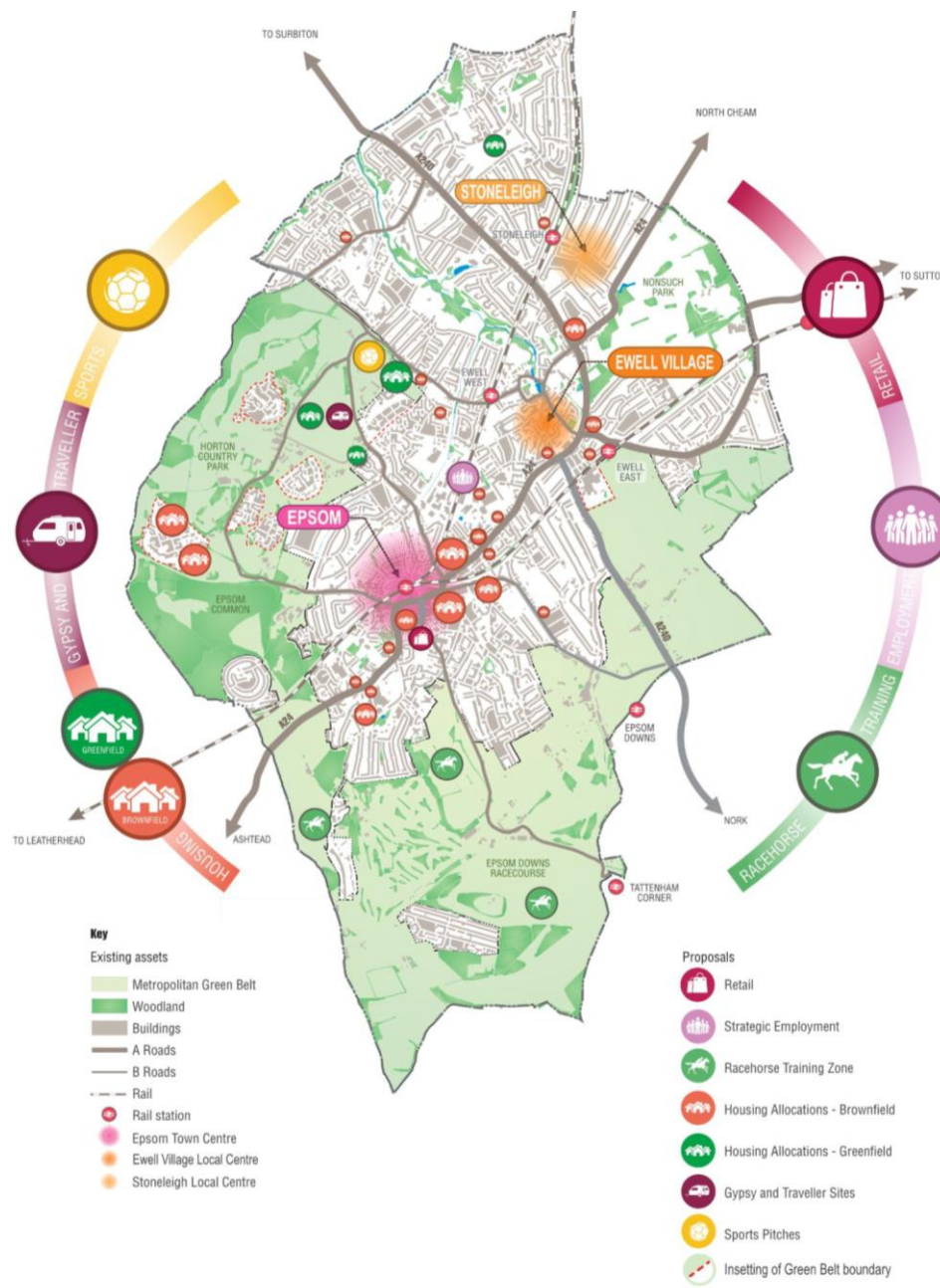
- A positive approach is required in respect of boosting the Local Plan’s housing land supply because an insufficiently positive approach could risk the Inspector calling a halt to the examination. The Inspector’s letter of 12th February 2026 confirmed the steps “necessary to progress the examination”.

2.5 Conclusion

2.5.1 This section has sought to set the scene for the current task of exploring options / scenarios in respect of boosting the Local Plan’s housing land supply and, in turn, the housing requirement. In summary:

- The key objective is to identify a package of potential additional site allocations in order to boost supply.
- Work has been completed leading to a shortlist of potential sites in contention for additional allocation.
- The wider objectives of the Local Plan remain a key consideration.
- The evidence base in support of the Submission Local Plan also remains highly relevant.
- There is an urgent need to adopt a Local Plan.
- There is a need to demonstrate a suitably positive and proactive approach.

Figure 2.2: The key diagram presented within the Submission Local 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 The SA framework

3.2.1 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.

3.2.2 Subsequently, ahead of the consultation in 2023, it was determined appropriate to add a new topic dealing with ‘Accessibility’ (to community infrastructure), but no further adjustments have been made.

Table 3.1: The SA framework

Topic	Objective
Accessibility (to community infrastructure)	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 The aim here is to report work undertaken to **define reasonable alternatives**.
- 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 define reasonable alternatives (RAs) taking into account “*the objectives and geographical scope of the plan*” which, in the current context, translates into a requirement to define alternative approaches to boosting supply (and, in turn, the housing requirement).
- 4.1.4 Specifically, there is a need to define alternative combinations of site allocations where each would involve a reasonable boost to supply and is also reasonable in light of the wider objectives of the Local Plan (these were presented in Section 2 of the SA Report but are not repeated in this report for brevity).
- 4.1.5 These can be referred to as “**growth scenarios**” and it can be noted that there was similarly a focus on RAs in the form of growth scenarios within the SA Report (2024) and the Interim SA Report (2023).
- 4.1.6 The aim of exploring growth scenarios is to provide decision-makers and consultees with an evidence based mutually exclusive choice in respect of the matter at the very heart of the current consultation.

What about site options?

- 4.1.7 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans. Were the goal to allocate one site, then site options would be RAs, but that is rarely the case and is not the case at the current time. Rather, the objective is to allocate a *package* of sites and so RAs must also take this form. Nonetheless, consideration is naturally given to the merits of site options as part of the process of defining RAs in the form of growth scenarios – see Section 5.3.

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 2026. To reiterate, growth scenarios equate to reasonable alternatives.
- 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**, which are the ‘building blocks’ of growth scenarios.
 - **Section 5.4** – draws upon the preceding two sections to define reasonable **growth scenarios**.

A note on limitations

- 5.1.3 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].

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 As discussed in Section 2, whilst the Submission Local Plan proposes a housing requirement of 4,700 homes over the plan period (2022 to 2040) there is now a clear direction to explore significantly boosting this figure in order to ‘close the gap’ to Local Housing Need (LHN), which is 10,242 homes (569 dpa) on the basis of the 2023 version of the Government’s standard method.

5.2.3 Strategic arguments can be made for closing the gap entirely (i.e. setting the housing requirement at LHN such that the Local Plan does not generate any unmet need), specifically arguments relating to:

- Housing need – there are three points to note. Firstly, Epsom and Ewell has an [affordability ratio](#) (the ratio of median house prices to median workplace-based earnings) of 13.7, which is one of the highest nationally outside of London, and the ratio was recently as high as 19.4. Secondly, 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 health and well-being and supporting the local economy. Thirdly, whilst LHN is taken to be 569 dpa for the purposes of preparing the Epsom and Ewell Local Plan,³ the Government published a new standard method in 2024 that provides a figure of 832 dpa, which provides context.
- Unmet need – none of the Borough’s neighbouring authorities have responded positively to requests made to them in respect of potentially providing for a proportion of Epsom and Ewell’s unmet need; indeed, some are already generating or at risk of generating unmet need themselves. The effect is to place a considerable additional onus on closing the gap to LHN as far as possible, and ideally entirely.⁴
- Affordable housing need – the Government’s Planning Practice Guidance (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*”. Whilst there is little or no question of the current Local Plan setting a housing requirement in excess of LHN, from the above quote it can clearly also be implied that affordable housing needs can serve as a reason for seeking to close the gap to LHN as far as possible (and ideally entirely).

The HEDNA (2023) identifies a need for 652 affordable homes per annum, which is in stark contrast to recent delivery, as set out across the annual Authority Monitoring Reports, with it notably the case that only two affordable homes were delivered in the Borough in the 2024/25 monitoring year, of a total of 112 homes delivered. This equates to delivering affordable housing at a rate of 1.7%, and the average rate over the period 2019 to 2025 is 10.45% (although it is 25.7% over the period 2007 to 2025). It is important to note that greenfield sites are much better placed to deliver a high proportion of affordable, indeed, it is not uncommon for brownfield sites to deliver no affordable housing on viability grounds.⁵

5.2.4 However, providing for housing need(s) in full in Epsom and Ewell is clearly highly challenging, and the Inspector has not given any indication that it is a requirement to now do so. There is a high evidential bar to reach in order to justify unmet housing need (in summary, “no stone left unturned”), particularly where there is little or no possibility of unmet need being provided for elsewhere in the near future (in the longer term there may be more potential given the context of Local Government Review and Devolution), but in the Epsom and Ewell context it is certainly reasonable to at least explore ‘unmet need’ scenarios.

³ LHN is taken from the 2023 standard method because the plan is being examined under ‘transitional arrangements’ (see paragraph 234(b) of the new NPPF published in December 2024).

⁴ For example, Mole Valley District Council stated in 2025: “*MVDC’s adopted local plan can only meet only approximately 75% of its own need... Having just been through this exhaustive search for housing capacity within the district, MVDC now faces the need for further revaluation to ascertain whether more housing is deliverable or developable. Without pre-empting this process, given all the district’s constraints and the relatively short turnaround time between the adoption of the current Local Plan and the conclusion of the forthcoming review, this will prove immensely challenging, and it is very difficult to conceive how this might result in MVDC being able to meet any of EEBC’s unmet housing need.*” Also, Reigate and Banstead stated in 2025: “*... constraints mean that Reigate and Banstead will find it particularly challenging to meet its own 2024 Standard Methodology housing need of 1,306 [dpa]... let alone other unmet need.*”

⁵ We note that CPRE Surrey disagrees with this point, stating in 2025: “*CPRE Surrey disagrees with the Plan’s conclusion in paragraph 3.21 that, to meet its social responsibilities for providing housing, the Council must allow significant development on Green Belt areas.... CPRE Surrey does not agree that the provision of affordable housing on significant brownfield sites needs to be at a lower percentage than that on greenfield sites – we suggest that Policy S6 should be amended to indicate that 50% affordable should be the minimum figure on all comprehensive redevelopment sites with half the affordable housing falling within the social rent category. What is missing from this Policy, as indicated above, is any commitment by the Council to facilitate the construction of housing for mainly social rent without relying on the capricious nature of the housing market...*”

- 5.2.5 Indeed, prior to submission work to define and appraise reasonable growth scenarios (firstly in 2023 and then again in 2024, with the latter stage of work informed by detailed consultation responses) led to all scenarios involving a housing requirement set at LHN being ruled out as *unreasonable*. There is now a need to revisit that previous conclusion (see further discussion below), but the fact remains that constraints to growth and limited supply options may limit what can reasonably be achieved in the Borough.
- 5.2.6 Finally, the following bullet points review a selection of recent adopted and emerging local plans that generate, or are considering generating, unmet housing need:
- Mole Valley – is of particular note as this is a neighbouring local authority and the Local Plan is adopted. The Inspector’s Report (2024) found a housing requirement set at 82% LHN to be sound, explaining:
 - *“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.”*
 - Three Rivers – the Secretary of State recently intervened to require that additional allocations are added to the Local Plan in order to boost supply and, in turn, the housing requirement. However, the effect of the supply boost will be to allow the housing requirement to be set at around 85% of LHN.
 - Hastings – the plan is at an early stage of preparation, with a Draft Plan recently published for consultation under Regulation 18, and this is a distinct context in that the plan area is mostly urbanised, i.e. such that there are few greenfield supply options. However, it is notable that the Secretary of State [wrote](#) to the Council in February 2026 stating a concern with the proposal to set the housing requirement at less than 27% of LHN and requiring further work to demonstrate no stone left unturned.
 - Welwyn Hatfield – the plan is at an early stage of preparation, with a Draft Plan recently published for consultation under Regulation 18, but it is notable that the plan is proposing a “ten year approach to allocations” on the basis that supply for years 11 to 15 of the plan period is a matter more appropriately considered in the future by a local plan prepared following Local Government Reorganisation.

Broad spatial strategy

- 5.2.7 The aim of this section is to present a high level discussion of broad spatial strategy issues and options largely unincumbered by knowledge of the available site options, to enable a strategic perspective.
- 5.2.8 The equivalent section of the SA Report (2024) discussed:
- The urban area – this was an opportunity to introduce the main urban area (also briefly the one other settlement inset from the Green Belt, namely Langley Vale) and explain that, whilst there is broad support for allocations in the urban area that would make better use of land and reduce pressure on the Green Belt (‘brownfield first’), there is a need to carefully consider development densities, including in terms of building heights, given existing urban character, heritage constraints and varying transport accessibility. Also, there is a need to apply caution in that if urban supply is committed to that then does not deliver (recognising that urban sites can be challenging to deliver) then there could be implications for the Borough’s ability to maintain a five year housing land supply. Finally, this section within the SA Report discussed the recently adopted Epsom Town Centre Masterplan and also the Longmead and Kiln Lane Industrial Estates, but neither topic necessitates further discussion at the current time.
 - Green Belt – this was an opportunity to identify and introduce five sub-areas, before each was then examined in more detail (including with reference to site options and potential growth scenarios) in a subsequent section of the report. However, at the current time there is little to be gained by discussing sub-areas within the Green Belt. Rather, there is simply a need to discuss additional sites for potential allocation (see Section 5.3) and then consider combinations / growth scenarios (Section 5.4).
 - Wider broad spatial strategy factors – there was discussion of the need for a good mix of sites, including in terms of a balance between: A) strategic greenfield sites that are well-placed to deliver benefits over-and-above new homes, including in terms of new or upgraded infrastructure; and B) smaller greenfield sites that: can often deliver in the crucially important early years of the plan period; tend to be associated with low/lower delivery risk; and tend to benefit from strong development viability (such that they tend to be able to deliver the full policy quota of affordable housing alongside delivering on wider policy asks).

5.2.9 At the current time there is limited need for further discussion of broad spatial strategy issues/options within this section of the report. However, one key matter for discussion here is varying levels of accessibility and transport connectivity. Specifically, it is appropriate to present the following two figures:

- Figure 5.1 – 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 varying accessibility / connectivity.
- Figure 5.2 – is a screenshot taken from the Government’s recently published Connectivity Tool. It shows varying connectivity within the key central part of the Borough (there are few if any significant growth options in the far north and far south) but does not report connectivity in absolute terms. The dataset can be further analysed [here](#) (including performance of any given area in absolute terms).

Figure 5.1: Centres, transport hubs and key corridors across the Borough

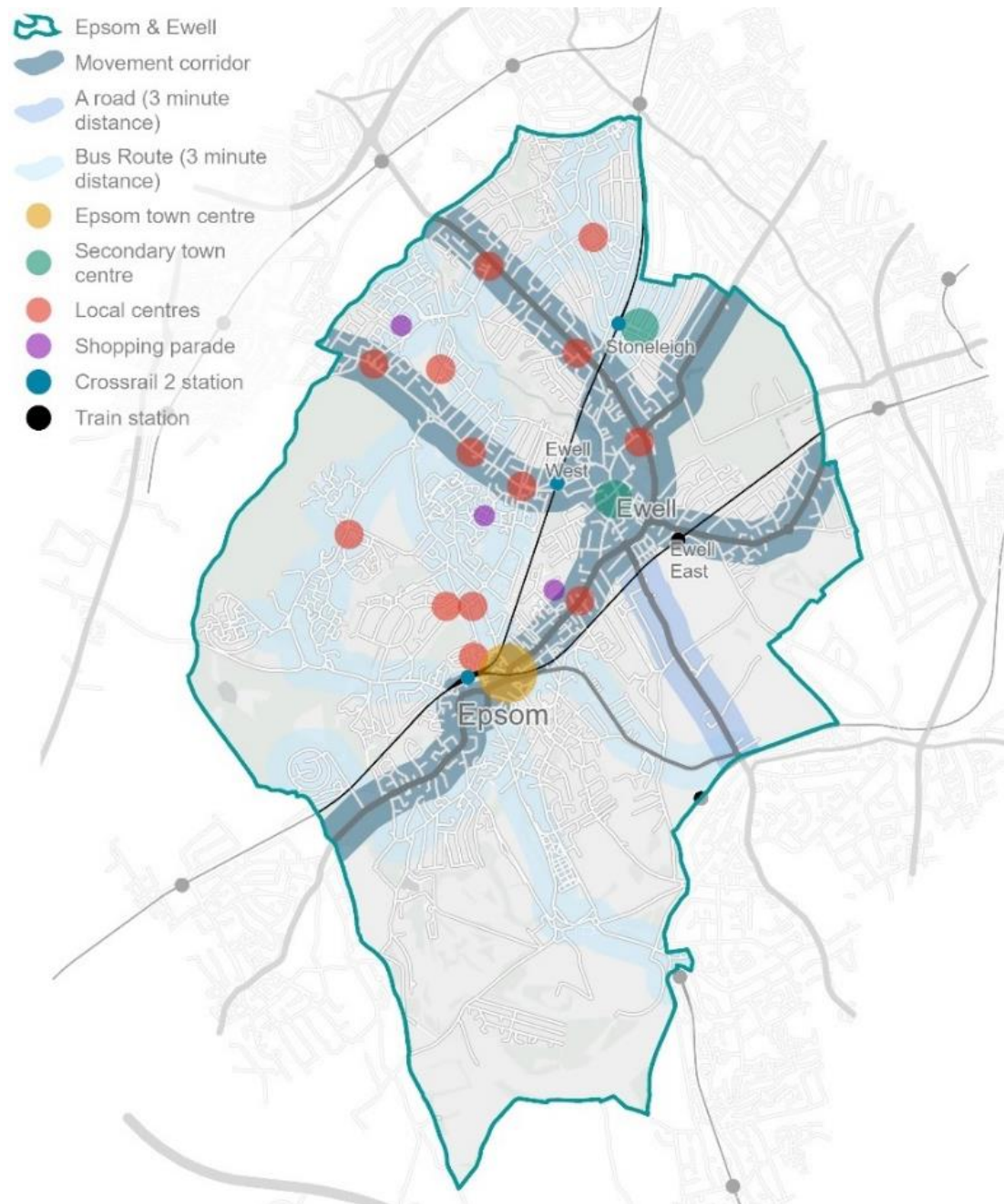
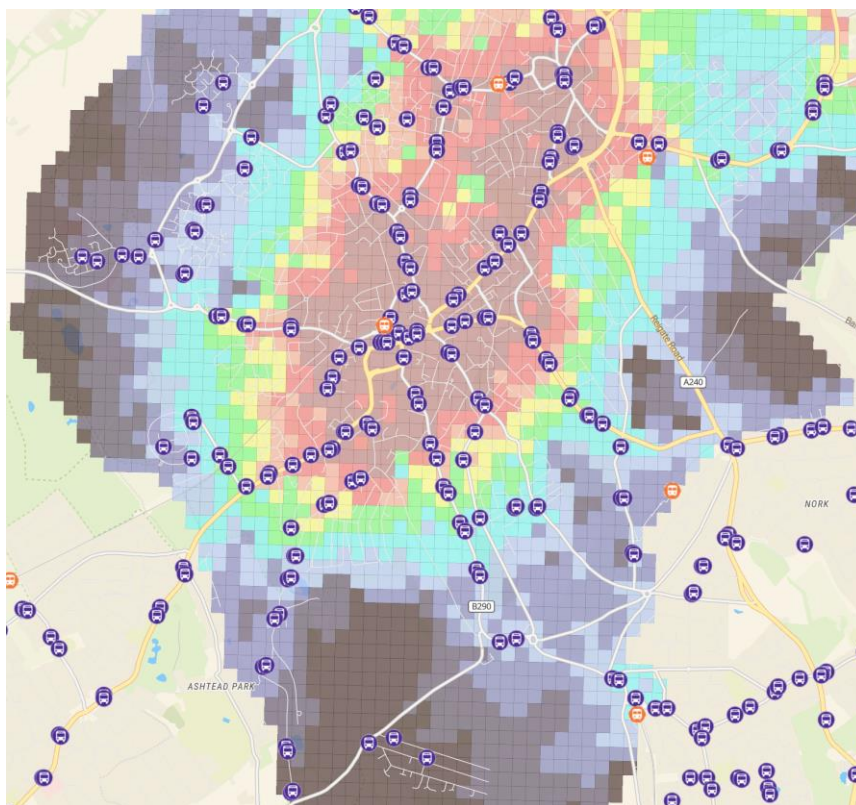


Figure 5.2: Screenshot from the Government's Connectivity Tool



5.3 Site options

- 5.3.1 The aim here is to discuss the shortlist of additional sites for potential allocation. This is in contrast to the equivalent section within the SA Report (2024), which only provided an initial overview of site options.
- 5.3.2 This section considers the two key broad categories of site option in turn.

Urban sites

- 5.3.3 For context, the Submission Local Plan allocates urban sites for a total of 1,146 homes, but following the Stage 2 hearings in October 2026 understanding is that this figure will be adjusted to 1,440 homes. It is clearly the case that this supply can be assumed as a 'constant' across the reasonable growth scenarios.
- 5.3.4 Focusing on the 13 additional sites for potential allocation identified in examination document COUD_020 (Feb 2026), which has been introduced above, the first point to note is that one site is now ruled out on flood risk grounds on the advice of the Lead Local Flood Authority, namely 47 Cheam Road (5 homes).
- 5.3.5 The capacity of the remaining 12 sites is 188 homes, and there is a clear case for holding this level of supply from additional urban allocations 'constant' across the reasonable growth scenarios, i.e. there is no clear case for testing lower or higher growth scenarios (recalling that no other sites are known to be available, and because there is no clear case for testing varying density assumptions).

Green Belt sites

- 5.3.6 As discussed in Section 2, the Green Belt Topic Paper Update (2026) discusses a long list of 33 Green Belt sites, but 7 of these can be immediately discounted as they are existing major developed sites.
- 5.3.7 Of the remaining 26 sites, the first point to note is that five of these are allocations within the Submission Local Plan, and indications following the Stage 2 hearings in October 2026 are that all five sites should be taken forward. Total supply from these five sites in the Submission Local Plan is 1,580 homes, but during the Stage 2 hearings it was agreed to increase the capacity of one site (SA32, Land at West Park Hospital (North)) from 150 to 180 homes, such that the total figure increases to 1,610 homes.

5.3.8 The table below presents the summary analysis from the Topic Paper in respect of these five sites.

5.3.9 Notes on the table are as follows:

- Sites are discussed in order of performance against the Calverton tests and then Green Belt sensitivity.
- The percentage of each site that is previously developed land (PDL) is recorded, and it should be noted that sites comprising a significant proportion of PDL are judged to automatically pass the Calverton tests.
- The transport score is that assigned by a study completed in 2023 (examination document IS06) where a higher score indicates strong performance (the highest score assigned to any site was 25.5).
- The Green Belt (GB) parcel sensitivity score is the overall score assigned to the relevant Green Belt parcel by the Green Belt Study Update 2024 (examination document GB01), where a higher score indicates higher sensitivity (the highest score assigned to any parcel was 9).
- The Calverton tests are introduced above in Section 2.

Table 5.1: Summary analysis of the submission Green Belt allocations from the Green Belt Topic Paper Update

Site ref.	Name	PDL	Transport score	Public transport info	GB parcel sensitivity	Calverton tests
HOR005 & HOR006 (SA31 & SA32)	West Park	30%	8.5 & 11	Regular bus services to Epsom Town centre (E10), the nearest train station Epsom is over half an hrs walk away.	2	N/a (PDL)
HOR008 (SA32)	West Park	41%	8.5	Regular bus services to Epsom Town centre, the nearest train station Epsom is over half an hrs walk away.	2	N/a (PDL)
HOR010 (SA33)	Land at Chantilly Way	No	21	Regular bus services to Epsom Town centre E5 and E9, the nearest train station Ewell West is 23 mins walk away.	2	Satisfied
COU026 (SA34)	Hook Road Arena	No	18.5	Regular bus services to Epsom and Kingston from Chessington Road, the nearest train station Ewell West is 20 mins walk away.	7	Satisfied
HOR009 (SA35)	Horton Farm	5%	17.5	Regular bus services to Epsom Town centre E5, E9, the nearest train station Ewell West is 24 mins walk away.	8	Satisfied

5.3.10 Prior to submission work reported in Sections 5.4 and 5.5 amounted to placing these five sites in an order of preference as follows (in descending order of preference):

- West Park (x2) – allocation was a ‘constant’ across the reasonable growth scenarios at both the Regulation 18 stage (2023) and the Regulation 19 stage (2024).
- Land at Chantilly Way – allocation was a ‘variable’ across the reasonable growth scenarios in 2023 but in 2024 the decision was taken that allocation should be a ‘constant’.
- Hook Road Arena – allocation was a ‘variable’ across the reasonable growth scenarios at both stages, but in 2024 the decision was taken to feature allocation in six of the seven scenarios appraised.
- Horton Farm – this was a key variable across the reasonable growth scenarios at both stages.

5.3.11 Ultimately, at this stage there is no clear basis for exploring the possibility of deleting any of the submission Green Belt allocations. Attention focuses on Horton Farm, but this is comfortably the largest of submission allocations (1,250 homes) such that it is very difficult to envisage reasonable growth scenarios without Horton Farm that deliver a significant boost to supply or even maintain the submission level of supply.

5.3.12 In turn, the key question is which of the 21 Green Belt omission sites should feature across the reasonable growth scenarios at the current time, i.e. should be 'progressed' to Section 5.4 of this report.

5.3.13 As an initial point, three sites (COL020, COL021 and WOO019) can be ruled out in that they are not being promoted for housing but rather are being promoted as greenspace alongside a third site which is being promoted for housing, namely COL023 (which itself is being promoted for c.50% greenspace).

5.3.14 The remaining 18 sites are shown in Table 5.2. Again, the table lists the sites in order of performance against the Calverton tests and then Green Belt sensitivity.

Table 5.2: Summary analysis of the submission Green Belt omission sites from the Green Belt Topic Paper Update

Site ref.	Name	PDL	Transport score	Public transport info	GB parcel sensitivity	Calverton tests
NON040	The Looe, Reigate Road	85%	13	Bus services in the area are limited and infrequent, the nearest train station Epsom Downs is 17 mins walk away.	1	N/a (PDL)
HOR001	Cuddington Glade	No	18	Regular bus services to Epsom Town centre (E9 and E10), the nearest train station Epsom is approx. 20 mins walk away.	1	Satisfied
HOR003	Manor Park	No	17	Regular bus services to Epsom Town centre (E9/E10), the nearest train station Epsom is approx. 20 mins walk away.	1	Satisfied
HOR004	Land off Cuddington Glade	No	17	Regular bus services to Epsom Town centre, the nearest train station Epsom approx. 20 mins walk away.	1	Satisfied
HOR011	Land south of West Cottage, Livingstone Park	No	15	Regular bus services E9 the nearest train station Epsom is 27 mins walk away.	1	Satisfied
HOR012	Clarendon Park	No	12	Regular bus services E9 the nearest train station Epsom is 41 mins walk away.	1	Satisfied
HOR014	Horton Hospital, Livingstone Park	No	16	Regular bus services E9 the nearest train station Epsom is 27 mins walk away.	1	Satisfied
NON016 & NON042 ⁶	Downs Farm	3%	13	Bus services in the area are limited and infrequent, the nearest train station Epsom Downs is 17 mins walk away.	6	Satisfied (NON016)
COL017	Land West of Burgh Heath Road	No	12	Bus services in the area are limited and infrequent, the nearest train stations is half an hours walk away.	7	Satisfied

⁶ The Green Belt Topic Paper firstly considers NON016 & NON042 jointly, before then reaching distinct conclusions for each individually. Specifically, NON016 is located to the north of the A2022 and satisfies the Calverton tests whilst NON042 is located to the south of the A2022 and does not satisfy the Calverton tests. NON016 might alternatively be referred to as the site that is under consideration for a development known as 'Downs Farm', and this was the case throughout the course of the SA process prior to submission, e.g. para 5.4.39 of the SA Report introduces NON016 as 'Downs Farm' and then para 5.4.41 explains that NON042 is a separate parcel of land, located to the south of Downs Farm (but in the same land ownership).

Site ref.	Name	PDL	Transport score	Public transport info	GB parcel sensitivity	Calverton tests
HOR007	Noble Park	No	12	There is a regular bus services to Epsom Town centre (E10) the nearest train station Epsom 20min-half an hrs walk away.	8	Satisfied
NON013	Land at Priest Hill	21	16	Regular bus services to Epsom Town centre and St Helier the nearest train station Ewell East adjacent to the site.	8	Satisfied
WOO020	Land North of Langley Bottom Farm	No	8	Bus services in the area are limited and infrequent, the nearest train stations is 40 mins walk away.	5	Not Satisfied
COL019	Land east of Burgh Heath Road	4%	12	Bus services in the area are limited and infrequent, the nearest train stations is half an hours walk away.	6 / 7	Not Satisfied
COL022	Clear Heights, Downs Road	25%	17	Although bus services in the area are limited and infrequent, the nearest train stations is approximately 30 mins walk away.	7	Not Satisfied
NON038	Banstead Road	No	9	Site is 15mins walk from regular bus services to Epsom Town centre and St Helier the nearest train station Ewell East adjacent to the site.	7	Not Satisfied
COL023	Land near Downs Road east	No	17	Bus services in the area are limited and infrequent, the nearest train stations is half an hours walk away.	8	Not Satisfied
HOR002	Hollywood Lodge	3%	13	There is a regular bus services to Epsom Town centre (E10) the nearest train station Epsom 20min-half an hrs walk away.	8	Not Satisfied
NON021	Drift Bridge Farm	3%	11	Bus services in the area are limited and infrequent, the nearest train station Epsom Downs is 12 mins walk away.	8	Not Satisfied

5.3.15 The next step is to discuss each of the 18 sites in turn, aiming to reach a conclusion on whether the site should be **ruled out** at this stage in the process or **progressed** to the reasonable growth scenarios. It can also be noted that the sites are shown in light blue on the interactive LAA map available [here](#).

5.3.16 Taking the sites in the order they are presented in Table 5.2:

- NON040 (The Looe, Reigate Road) – a very small PDL site in the east of the Borough. It has recently been granted permission for intensified employment uses (25/00995/FUL) hence it can be **ruled out**.
- HOR001 (Cuddington Glade) – a very small site in the west of the Borough. The SA Report (2024) did not progress the site to the reasonable growth scenarios as a pragmatic step, given that it is a very small site, but acknowledged the site to have relatively limited sensitivities (para 5.4.29). A further point to note is a pending planning application for a residential care home (26/00002/FUL). At the current time this site is **progressed** to the reasonable growth scenarios.

- HOR003 (Manor Park) – a larger site located in the west of the Borough (just west of HOR001). The SA Report ruled this site out on biodiversity grounds, and then the policy map for the Submission Local Plan identified this as an area for biodiversity enhancements (a ‘habitat bank’), and the latest situation is that the site has been designated as a Site of Nature Conservation Importance (SNCI). It is important to note that Epsom Common SSSI is in close proximity to the south, and also that this is Council-owned land such that the site is likely no longer available for housing. In conclusion, this site can be **ruled out**.
- HOR004 (Land off Cuddington Glade) – a small site in the west of the Borough, adjacent to HOR001. The SA Report (2024) did not progress the site to the reasonable growth scenarios as a pragmatic step, given that it is a small site, but acknowledged the site to have relatively limited sensitivities (para 5.4.29). At the current time this site is **progressed** to the reasonable growth scenarios.
- HOR011 (Land south of West Cottage, Livingstone Park) – a small site in the west of the Borough. There are constraints onsite and the SA Report discussed a pending planning application for one home, which was then refused (24/00588/OUT). Subsequently an application was made for two homes, which was also refused (25/00908/OUT). Overall, it is clear that the site capacity is below the threshold for allocation in the Local Plan, such that the site can be **ruled out**.
- HOR012 (Clarendon Park) – a small site in the west of the Borough. Section 5.3 of the SA Report (2024) reported that the site was ruled out through the officer-led Site Assessment Methodology (2024; examination document HB05) on the basis of comprising amenity greenspace, and it is also the case that part of the site is an SNCI. Further considerations are: A) whilst the theoretical capacity of the site is 40 homes in practice it is likely considerably lower given onsite mature trees / woodland; and B) the non-wooded part of the site is evidently in active use as amenity greenspace (see [Streetview](#)). In summary, this site can be **ruled out**.
- HOR014 (Horton Hospital, Livingstone Park) – an irregular shaped site in the west of the Borough, comprising amenity greenspace wrapping around the Livingstone Park neighbourhood. Section 5.3 of the SA Report (2024) reported that the site was ruled out through the Site Assessment Methodology (2024) as it comprises amenity greenspace and partly comprises an SNCI, and it is also the case that the part of the site falls within a conservation area. It is the eastern part of the site that is neither an SNCI nor a conservation area, but the land here evidently functions as amenity greenspace including noting mature trees (see [Streetview](#)). Any capacity is very low, and overall this site can be **ruled out**.
- NON016 (Downs Farm) – is a large site that was given close consideration through the appraisal of reasonable growth scenarios in both 2023 and 2024. At the current time it is **progressed**.⁷
- COL017 (Land West of Burgh Heath Road) – one of a cluster of three sites in the south east of the Borough that were jointly considered for allocation through the appraisal of reasonable growth scenarios in both 2023 and 2024. Specifically, sites COL017, COL019, COL023 were jointly considered as a “south east cluster”, i.e. it was assumed they would deliver in combination.⁸ A further consideration is that land adjacent to the south of COL017 is now under construction for a Racehorse Training Establishment and 46 residential apartments, and the effect of this development is to reduce the sensitivity of COL017 in landscape and Green Belt terms. At the current time it is **progressed**.
- HOR007 (Noble Park) – a larger site in the west of the Borough, which would deliver an eastwards extension to Noble Park (which includes West Park Hospital). It featured in the reasonable growth scenarios in both 2023 (as part of a cluster comprising this site along with HOR002, referred to as “south of Manor Park”) and 2024 (again in combination with HOR002, with the cluster referred to as “Noble Park extension / Hollywood Lodge”). At the current time it is **progressed**.
- NON013 (Land at Priest Hill) – located adjacent to Ewell East Station. In 2023 it was a variable across the reasonable growth scenarios and a proposed allocation, whilst in 2024 it was a variable across the reasonable growth scenarios but *not* a proposed for allocation. At the current time it is **progressed**.

⁷ The Green Belt Topic Paper Update also discusses NON042 (land to the south of the A2022; Green Belt parcel 35) alongside NON016 (land to the north of the A2022; Green Belt parcel 37). However, and as discussed, NON042 is not being proposed for housing, and it is also the case that it does not satisfy the Calverton tests. To be clear, the ‘Downs Farm’ site that is progressed to the RA growth scenarios is site NON016 only (land north of the A2022, adjacent to the Epsom urban area).

⁸ This was partly a pragmatic decision to reduce the number of variables across the reasonable growth scenarios, but also the decision reflected a view that there could be benefits to allocation in combination.

- WOO020 (Land North of Langley Bottom Farm) – located at Langley Vale in the south of the Borough. This site was discussed in some detail within Section 5.4 of both the Interim SA Report (2023) and the SA Report (2024), and at both stages a decision was then made to rule the site out. By way of an update, it can also be noted that the Government’s Connectivity Tool (2026) scores the site in the region of 43 to 45 out of 100 (where a higher score indicates stronger connectivity), whilst most land around the edge of the main urban area scores distinctly higher, typically with scores of between 50 and 60. The recent context is also that a planning application for 110 homes was [refused](#) (25/00846/OUT) on the grounds of: A) unsustainable development (in transport terms); B) inappropriate development in the Green Belt; C) impact on the horse training and racing industry; and D) harm to the landscape character of the area. The refusal went against the advice of officers, and the application is being appealed, but this site is nonetheless **ruled out on balance**.
- COL019 (Land east of Burgh Heath Road) – located in the south east of the Borough and explored as a variable across the reasonable growth scenarios in both 2023 and 2024 as part of the aforementioned “south east cluster”. It fails the Calverton tests but nonetheless warrants progression to the reasonable growth scenarios, given the strategic context. In summary, this site is **progressed on balance**.
- COL022 (Clear Heights, Downs Road) – a small site located in the south east of the Borough. It was ruled out in Section 5.4 of the SA Report, with the report explaining: “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 [given proposed greenspace in COL023].” It fails the Calverton tests for clear cut reasons (“a detached element/satellite within the GB”), transport connectivity is quite poor, and this is raised land near to Epsom Downs. In conclusion, this site is **ruled out on balance**.
- NON038 (Banstead Road) – a small site in the east of the Borough. Section 5.3 of the SA Report (2024) reported that the site was ruled out through the officer-led Site Assessment Methodology (2024) on the basis of fragmented land ownership. Section 5.4 of the SA Report then further explained: “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).” It fails for the Calverton tests for relatively clear cut reasons and overall is **ruled out on balance**.
- COL023 (Land near Downs Road east) – located in the south east of the Borough and explored as a variable across the reasonable growth scenarios in both 2023 and 2024 as part of the aforementioned “south east cluster”. It fails the Calverton tests but nonetheless warrants progression to the reasonable growth scenarios, given the strategic context. In conclusion, this site is **progressed on balance**.
- HOR002 (Hollywood Lodge) – a larger site in the west of the Borough. It featured in the reasonable growth scenarios in both 2023 (as part of a cluster comprising this site along with HOR007, referred to as “south of Manor Park”) and 2024 (again in combination with HOR007, with the cluster referred to as “Noble Park extension / Hollywood Lodge”). Whilst it fails the Calverton tests this is on the basis of an assumption that it would deliver in isolation, whilst for current purposes it is reasonable to consider the possibility of delivery in combination with HOR007. In conclusion, this site is **progressed on balance**.
- NON021 (Drift Bridge Farm) – a large site in the east of the Borough. This site was discussed in some detail in Section 5.4 of both the Interim SA Report (2023) and the SA Report (2024), and at both stages a decision was made to rule the site out. A planning application was recently granted for an 8 home scheme on the previously developed part of the site (25/00801/FUL), and the site promoter has not provided any details regarding how a larger scheme could be delivered that addresses the issues with the site. The Green Belt Topic Paper (2026) concludes as follows: “The level of harm is recognised on this high scoring site and concluded that the development of the site would result in sprawl from the south and breach an existing strong durable boundary making the area vulnerable to further development in the future. Based on the above it is considered that exceptional circumstances do not exist justifying an amendment to the Green Belt boundary here.” It can also be noted that there could or would be an in combination impact with Downs Farm, which is located in close proximity to the north west, and is a better performing site such that there is no reasonable scenario whereby Drift Bridge Farm is allocated but not Downs Farm. In conclusion, this site is **ruled out on balance**.

5.3.17 In summary, of the 18 omission sites presented in Table 5.2:

- 6 sites are **progressed** with some confidence.
- 3 sites are **progressed on balance**, despite failing the Calverton tests, including noting that all three sites featured across the reasonable growth scenarios prior to submission.

- 4 sites are **ruled out on balance**, including due to failing the Calverton tests. In summary: WOO020 is the subject of a forthcoming appeal and performs poorly in accessibility/connectivity terms; COL022 is a small and poorly connected site on raised land close to Epsom Downs; NON038 was ruled out early prior to submission due to land availability plus there is a concern regarding settlement separation; and NON021 is a larger site with clear challenges, and it is unclear whether or how these could be addressed.
- 5 sites are **ruled out** with some confidence, albeit acknowledging that all five sites pass the Calverton tests. The two sites where the decision is perhaps somewhat marginal are those that comprise amenity greenspace (HOR012 and HOR014), but both sites appear to function well as amenity greenspace and any realistic capacity would likely be low. It is also the case that neither site is being actively promoted.

5.3.18 The total capacity of the nine progressed sites is 1,477 homes, as set out in Table 5.3. As such, even if they were all to be allocated the Local Plan housing land supply would still fall a long way short of LNH (i.e. the Local Plan would still generate significant unmet need). However, despite this strategic context it is not possible to identify any additional sites that reasonably warrant being progressed.

5.3.19 Finally, it can be noted that a Regulation 19 representation from the landowner of Woodcote Stud, in the far southwest of the Borough, suggested that the LAA should be revisited to give consideration to their site (and there is now a live application for supported living accommodation and 14 homes; 25/01483/FUL), but it is now too late in the process to revisit the LAA. This land was discussed at para 5.4.17(8) within the Interim SA Report (2023).

Table 5.3: Capacity of the nine progressed omission sites

Site ref.	Name	Capacity	Comments
HOR001	Cuddington Glade	37	C3 conversion from 70 bed C2
HOR004	Land off Cuddington Glade	50	
COL017	Land West of Burgh Heath Road	50	
HOR002	Hollywood Lodge	50	
HOR007	Noble Park	90	Constraints could suggest lower
COL019	Land east of Burgh Heath Road	100	In line with site promoter information. ⁹
COL023	Land near Downs Road east	160	
NON013	Land at Priest Hill	275	There was recently a pre-application consultation on a scheme for up to 300 homes, but officers suggest 275 homes.
NON016	Downs Farm	530	

⁹ Whilst the HELAA records a capacity of 300 homes the site promoter has informed the Council that not all of the site is available, and they are focusing attention on the part of the site closest to the existing urban edge. This is in line with the assumption made within the SA Report (2024), which explained: "... 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." A scheme of 100 homes would involve a gross density of around 40 dpa, such that in practice capacity could be lower, but 100 homes is a reasonable assumption.

5.4 Reasonable growth scenarios

- 5.4.1 The final task is to define reasonable growth scenarios defined as alternative approaches to supply from:
- Completions and commitments – 1,159 homes (N.B. an adjustment to the equivalent figure in the Submission Local Plan given one additional year of completions and the latest commitments figure).
 - A windfall assumption – 790 homes (N.B. an adjustment to the equivalent figure in the Submission Local Plan given one less year when windfall can be accounted for).
 - Submission urban allocations – 1,440 homes (as discussed in Section 5.3).
 - Additional urban allocation options (x12) – 188 homes (as discussed in Section 5.3).
 - Submission Green Belt allocations (x5) – 1,580 homes (as discussed in Section 5.3).
 - Additional Green Belt allocation options (x9) – up to 1,477 homes (as discussed in Section 5.3).
- 5.4.2 In summary, the starting point is the approach to supply set out in the Submission Local Plan (with figures updated), and then the task is to define growth scenarios that would deliver a boost to supply.
- 5.4.3 The following reasonable growth scenarios are defined:
- **Growth Scenario 1** – the Submission Local Plan supply plus the 12 additional urban allocation options.
 - **Growth Scenario 2** – Scenario 1 plus additional allocation of three smaller Green Belt sites that are considered to generate relatively few concerns, namely HOR001, HOR004 and COL017.
 - **Growth Scenario 3** – Scenario 2 plus additional allocation of NON013 (Land at Priest Hill). This is a strongly performing site but as a larger site warrants being a variable across the growth scenarios.
 - **Growth Scenario 4** – Scenario 3 plus additional allocation of NON016 (Downs Farm). This site passes the Calverton test and could deliver a major boost to supply.
 - **Growth Scenario 5** – Scenario 4 plus additional allocation of HOR007 (Noble Park). This site passes the Calverton tests but is subject to suitability issues including in biodiversity terms.
 - **Growth Scenario 6** – Scenario 5 plus additional allocation of three sites that fail the Calverton tests but nonetheless warrant further consideration on balance (HOR002, COL019 and COL023).
- 5.4.4 Under the highest growth scenario (Scenario 6) total supply would be 6,529 which compares to the LHN figure of 10,242, i.e. such that there would be *at least* 3,713 homes unmet need.¹⁰ However, there are not considered to be any reasonable higher growth scenarios given the available supply options.
- 5.4.5 As a final point, it can be noted that all of the additional allocation options that feature across the reasonable growth scenarios at this stage also featured within the reasonable growth scenarios prior to submission. This is the outcome of the evidence-led process reported in Sections 5.2 and 5.3.

¹⁰ Unmet need would be higher should it transpire that there is a need to set the housing requirement at a figure below the total supply figure such that there is a 'supply headroom' aimed at ensuring that the Council is able to demonstrate a five year housing land supply at adoption and then maintain one over the early years of the plan period.

Table 5.4: The reasonable alternative growth scenarios (with constant supply components greyed-out)

Supply component		1	2	3	4	5	6
Completions and permissions		1,159	1,159	1,159	1,159	1,159	1,159
Windfall		790	790	790	790	790	790
Submission urban allocations		1,440	1,4440	1,440	1,440	1,440	1,440
Additional urban allocation options		188	188	188	188	188	188
Submission Green Belt allocations		1,610	1,610	1,610	1,610	1,610	1,610
Additional Green Belt allocation options	HOR001	Cuddington Glade		37	37	37	37
	HOR004	Land off Cuddington Glade		50	50	50	50
	COL017	Land West of Burgh Heath Road		50	50	50	50
	NON013	Land at Priest Hill			275	275	275
	NON016	Downs Farm				530	530
	HOR007	Noble Park				90	90
	HOR002	Hollywood Lodge					50
	COL019	Land east of Burgh Heath Road					100
	COL023	Land near Downs Road east					160
Total housing supply		5,187	5,324	5,599	6,129	6,219	6,529

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

6 Introduction to Part 2

- 6.1.1 The aim of this part of the report is to present an appraisal of the six reasonable growth scenarios, i.e. the six alternative approaches to boosting supply that are currently a focus of consultation. In summary
- **Growth Scenario 1** – the Submission Local Plan plus the 12 additional urban allocation options.
 - **Growth Scenario 2** – Scenario 1 plus HOR001, HOR004 and COL017.
 - **Growth Scenario 3** – Scenario 2 plus NON013 (Land at Priest Hill).
 - **Growth Scenario 4** – Scenario 3 plus NON016 (Downs Farm).
 - **Growth Scenario 5** – Scenario 4 plus HOR007 (Noble Park).
 - **Growth Scenario 6** – Scenario 5 plus HOR002, COL019 and COL023.

7 Growth scenarios appraisal

7.1 Introduction

- 7.1.1 The aim here is to appraise the growth scenarios 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.

Appraisal methodology

- 7.1.2 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

- 7.1.3 Further methodological points are as follows:

- The baseline situation – is assumed to be a situation whereby the Local Plan is not adopted and so growth continues to come forward under the presumption in favour of sustainable development.
- Scenario 1 – is very close to the Submission Local Plan; specifically it is the Submission Local Plan approach plus an additional 188 homes from additional urban allocations. As such, a key question is whether the appraisal should: A) reflect an assumption that the Local Plan is adopted, such that conclusions on Scenario 1 will tend to be broadly as per those reached on the Submission Local Plan in the SA Report (2024), or B) reflect a new assumption that Scenario 1 would or could lead to a situation whereby the Local Plan is found unsound and so not adopted, such that growth comes forward under the presumption in favour of sustainable development. On balance approach (A) is favoured.

Similarly, Scenario 6 at the current time is identical to Scenario 7 from the Regulation 19 / SA Report stage (2024) and so a key question is whether: A) conclusions at this stage should broadly align with those from 2024 (unless there is new evidence in respect of a substantive issue/impact); or B) the appraisal should give weight to the new strategic context in respect of needing to take a proactive approach to boosting supply in order to minimise the potential of the Local Plan being found unsound (and, in turn, minimise the risk growth comes forward under the presumption in favour of sustainable development). Again, on balance approach (A) is favoured.

- Unmet need – the assumption is that unmet need generated in Epsom and Ewell will result in pressure to provide for this unmet need elsewhere in the sub-region, albeit precisely where and when is unknown.

7.2 Accessibility (to community infrastructure)

Scenario 1 Additional urban allocations	Scenario 2 Scenario 1 + three sites	Scenario 3 Scenario 2 + one site	Scenario 4 Scenario 3 + one site	Scenario 5 Scenario 4 + one site	Scenario 6 Scenario 5 + three sites
2	2	1	1	1	1

7.2.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

“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)... 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).”

7.2.2 Taking the supply boost scenarios in turn:

- Scenario 1 – would involve additional allocation of only 12 urban sites. Several are proposed to be mixed use, albeit in part to avoid or mitigate loss of existing commercial / community / leisure floorspace.
- Scenario 2 – beginning with the two sites to the west, these are small sites that are unlikely to deliver anything of significance in terms of new or upgraded community infrastructure, but this is a reasonably accessible location in relative proximity to the town centre, and it appears that neither site performs a significant role in terms of providing accessible or amenity greenspace. The site to the south east is similarly small and so unlikely to deliver significant community benefits, although opportunities might be explored, e.g. a small play area to benefit the nearby residential community. All three sites have a similar connectivity score, but the sites to the west are located on a more strategic road corridor.
- Scenario 3 – the site added under this scenario (Land at Priest Hill) is very well connected given a location adjacent to Ewell East Station, and furthermore [the proposal](#) is to deliver several units adjacent to the station for “commercial / community amenities”, which they suggest will form “a vibrant local hub”. Furthermore, the proposal is to deliver a better pedestrian access to Ewell East Station, a park and playground (also two secondary play spaces) and 50% family sized homes. The proposal will also retain 3.7 ha of land for sports pitch provision that is currently used by a local Rugby Football Club.

Finally, the site is considered through a recent update to the Infrastructure Delivery Plan (IDP, 2026), which identifies the potential to deliver: *“measures to improve walking and cycling along the Cheam Road corridor and at the A24 junction are investigate, with a focus on reducing severance, improving crossing opportunities, and enhancing overall safety and attractiveness for active mode.”*

- Scenario 4 – the site added under this scenario (Downs Farm) is a larger site such that there is good potential to require targeted new or upgraded community infrastructure alongside new homes. The following statement from the SA Report (2024) still broadly holds true:

“... 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.”

Also, the SA Report noted: *“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.”*

Finally, the site is considered through a recent update to the IDP (2026), which identifies the potential to deliver: *“the potential re-routing of the 166 bus service to serve the site and improvements to the accessibility of the site to Ewell Downs station.”* Furthermore, the IDP (2026) identifies a need for SEND School Place provision and that this could potentially be accommodated on Downs Farm.

- Scenario 5 – the site added under this scenario (Noble Park) has an assumed capacity of 90 homes, but capacity could be less, e.g. accounting for Epsom Common SSSI, an adjacent long distance path that links the common to Horton Country Park and access challenges including noting onsite allotments. The intention is to retain the allotments within the site, and it is also noted that the proposal is to deliver a small play area, but there is potentially a concern regarding impacts to the allotments (see Figure 7.1). This site should also be considered in the context of adjacent and nearby sites that have been considered for development over the course of the plan-making process (e.g. see discussion at paras 5.4.24 to 5.4.26 of the SA Report, 2024), including the Hollywood Lodge site discussed below. Specifically, there could be merit to a strategic approach to growth in this sector of the Borough, certainly in terms of green infrastructure and potentially also community infrastructure.
- Scenario 6 – taking the three sites added under this scenario in turn:
 - Hollywood Lodge (50 homes) – is located between Noble Park and Manor Park, as discussed above, such that the point above regarding taking a strategic approach to growth in this broad area applies. The context is also that there are allotments to the north, Epsom Common is to the south and the recently designated Manor Park SNCI is to the east. The promoter of this site has not engaged in the Local Plan for a number of years and so no details are known regarding site-specific proposals.
 - Land east of Burgh Heath Road (100 homes) – is located to the east of Land west of Burgh Heath Road, which is a 50 home site that features in Scenario 2 and subsequent scenarios. The possibility of coordinated growth to secure targeted new or upgraded community infrastructure could be explored. The site promoter has recently engaged to confirm that not all of the previously identified site is available (i.e. site COL019 in the [LAA](#)) but no details are known regarding site specific proposals.
 - Land near Downs Road east (160 homes) – as discussed in the SA Report (2024) the site “*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.*” This site appears to have a slightly lower connectivity score than is the case for the two sites discussed above that are located nearby along Burgh Heath Road, but this is fairly marginal.

7.2.3 Two further considerations are:

- Access to strategic green infrastructure – all of the potential additional allocation options are considered to perform quite well in this respect, but sites to the west in particular benefit from good access to Epsom Common and Horton Country Park. Also, Land at Priest Hill is close to Priest Hill Nature Reserve.
- Growth quantum – as stated in the SA Report (2024): “... *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... have merit.*”

7.2.4 In **conclusion**, there is support for the higher growth scenarios that would involve a proactive approach to boosting supply in a way that directs growth to sites well placed to ensure that housing growth comes forward in the Borough in a way that aligns well with accessibility objectives. Scenarios 5 and 6 do not give rise to any significant concerns from an accessibility perspective, but equally there are limited benefits over-and-above Scenario 4, and so they are judged on a par with Scenario 4.

Figure 7.1: The site promoter’s concept masterplan for Noble Park (HOR007)



7.3 Air quality

Scenario 1 Additional urban allocations	Scenario 2 Scenario 1 + three sites	Scenario 3 Scenario 2 + one site	Scenario 4 Scenario 3 + one site	Scenario 5 Scenario 4 + one site	Scenario 6 Scenario 5 + three sites
=	=	=	=	=	=

7.3.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“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.”*

7.3.2 With regards to the supply boost scenarios, none of the sites are thought to give rise to a significant concern in terms of significantly impacting local air quality either alone or in combination. Land at Priest Hill was discussed in the SA Report as being 670m from Ewell AQMA but this AQMA was recently revoked. In any case, the site is located adjacent to Ewell East railway station, and will likely deliver modest onsite retail, such there should be the potential to achieve a degree of modal shift.

- 7.3.3 A further consideration is then the importance of minimising unmet need. On the one hand, the argument made in support of higher growth scenarios within the SA Report still holds true to some extent, namely that unmet housing need is problematic in transport and therefore air quality terms. However, on the other hand, the evidence from the examination to date has not served to highlight any major concerns raised by key stakeholder/partner organisations in respect of unmet need from a transport perspective.
- 7.3.4 growth quantum, in that 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. However, on the other hand, under Scenario 6 there could be a need for further transport modelling work to confirm that the effect of growth would not be to generate problematic traffic congestion with air quality implications.
- 7.3.5 In **conclusion**, it is very difficult to confidently and meaningfully differentiate between the growth scenarios at this stage, and so on balance they are judged to perform on a par. See further discussion below under the ‘transport’ topic heading.

7.4 Biodiversity

Scenario 1 Additional urban allocations	Scenario 2 Scenario 1 + three sites	Scenario 3 Scenario 2 + one site	Scenario 4 Scenario 3 + one site	Scenario 5 Scenario 4 + one site	Scenario 6 Scenario 5 + three sites
★ 1	★ 1	★ 1	★ 1	2	3

- 7.4.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“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... 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.”*

- 7.4.2 Taking the supply boost scenarios in turn:

- Scenario 1 – none of the additional urban sites are known to be subject to significant constraint.
- Scenario 2 – the two sites to the west have limited constraint, although the northern site is partly constrained by Tree Protection Orders (TPOs) and, in this regard, it is important to note that the current assumed capacity of 50 homes is at the upper end of the capacity range established through the LAA. The site to the south east appears to be subject to low constraint, although historic imagery does not show any evidence of arable cultivation so there could feasibly be some chalk grassland value.
- Scenario 3 – the site added under this scenario (Land at Priest Hill) is subject to limited constraint.¹¹
- Scenario 4 – the site added under this scenario (Downs Farm) is subject to limited constraint, and the potential to deliver targeted onsite biodiversity gains can be envisaged. The SA Report (2024) discussed the strategic importance of the southern part of the site (NON016), which is proposed for strategic greenspace, as well as “Green Belt parcel 35” (NON042), which is located adjacent to the south of the Downs Farm site and in the same land ownership. The SA Report explained:

“... both Downs Farm and GB parcel 35 fall within the ‘North Downs; Epsom Downs’ Biodiversity Opportunity Area (BOA)... If development of Downs Farm could enhance green infrastructure links between Epsom Downs and Bansted 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...”

¹¹ The SA Report (2024) explained: “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).” It is noted that the nature reserve was previously playing fields, as discussed [here](#).

- Scenario 5 – the site added under this scenario (Noble Park) is constrained on account of adjacent Epsom Common SSSI and noting extensive boundaries designated as a TPO (see the [LAA](#)). Furthermore, the potential for this site to play an important role in terms of ecological connectivity between Epsom Common (SSSI) and Horton County Park (SNCI) can certainly be envisaged.
- Scenario 6 – taking the three sites added under this scenario in turn:
 - Hollywood Lodge (50 homes) – the sensitivities are broadly similar to adjacent Noble Park. There is a significant area of TPO woodland within the site, but historic aerial imagery from 1945 shows only a small number of trees. Allocation of this site in combination with Noble Park could necessitate a coordinated approach to green infrastructure including to secure north-south ecological connectivity.
 - Land east of Burgh Heath Road (100 homes) – appears to be subject to low constraint, although historic imagery does not show any evidence of arable cultivation (the site appears to have historically been used for horse training etc.) so there could feasibly be some chalk grassland value. Also, there would be a degree of erosion of the north-south strategic green corridor between Epsom Downs and Banstead Downs (see Figure 6.3 from the SA Report).
 - Land near Downs Road east (160 homes) – the SA Report explained: “... the promoter 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).”

7.4.3 A final key consideration is growth quantum, specifically:

- Higher growth in Epsom and Ewell – is potentially problematic given that 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. The great majority of the Borough’s Green Belt falls within a Biodiversity Opportunity Area (see the map available [here](#)).
- Habitats Regulations Assessment (HRA) – recent HRA work has confirmed that additional allocation scenarios up to and including Scenario 5 would not give rise to a significant adverse effect on any internationally designated biodiversity site, but the HRA work has not considered Scenario 6.
- Unmet need – 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).

7.4.4 In **conclusion**, again it is difficult to confidently and meaningfully differentiate the scenarios, because it is now more difficult to give weight to a key factor that previously influenced the ranking of the scenarios, namely that unmet need is problematic in biodiversity terms. The key factor reflected in the current ranking of the scenarios is a concern with growth adjacent to Epsom Common SSSI under Scenario 5 and, in particular, Scenario 6. With regards to Scenarios 1 to 4, the biodiversity sensitivities associated with the sites that would deliver higher growth are modest, and so these scenarios are ranked on a par.

7.5 Climate change adaptation

Scenario 1 Additional urban allocations	Scenario 2 Scenario 1 + three sites	Scenario 3 Scenario 2 + one site	Scenario 4 Scenario 3 + one site	Scenario 5 Scenario 4 + one site	Scenario 6 Scenario 5 + three sites
=	=	=	=	=	=

7.5.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“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...”*

- 7.5.2 With regards to the current supply boost scenarios, none of the additional Green Belt allocation options are subject to significant flood risk. With regards to urban allocation options, there can sometimes be a tension between urban intensification objectives and flood risk objectives, but there is often good potential to avoid and mitigate risk including through site design. The current list of 12 sites was whittled down from the original shortlist of 13 on flood risk grounds, as discussed above in Section 5.3.
- 7.5.3 There is a degree of surface water flood risk around the edge of the two western-most sites (Noble Park and Hollywood Lodge) and also Downs Farm, but there is little reason to suggest that this would act as a significant hinderance to safe access or otherwise hinder effective masterplanning, nor is it possible to suggest any significant risk of increased surface water runoff leading to significant downstream flood risk.
- 7.5.4 In **conclusion**, the scenarios are judged to perform on a par on balance, given no significant concerns with the additional allocation options nor any concerns with in-combination impacts under Scenario 6.

7.6 Climate change mitigation

Scenario 1 Additional urban allocations	Scenario 2 Scenario 1 + three sites	Scenario 3 Scenario 2 + one site	Scenario 4 Scenario 3 + one site	Scenario 5 Scenario 4 + one site	Scenario 6 Scenario 5 + three sites
=	=	=	=	=	=

N.B. the focus here is on built environment decarbonisation with transport discussed subsequently.

- 7.6.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):
- “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).”*
- 7.6.2 In short, the appraisal concluded a neutral effect for the plan as a whole despite having concluded a ‘moderate or uncertain’ negative effect for the spatial strategy / site allocations aspect of the plan, after having taken into account the proposal for quite stringent development management policy.
- 7.6.3 With regards to the current supply boost scenarios, and focusing on the additional Green Belt allocation options, there is no reason to suggest that any are associated with a particular built environment decarbonisation opportunity. However, all are fairly uncomplicated greenfield sites such that there is no reason to suggest that there would be abnormal development costs that would affect the potential to viably deliver net zero carbon development.
- 7.6.4 In **conclusion**, it is again difficult to confidently and meaningfully differentiate between the growth scenarios at this stage and so, on balance, they are judged to perform on a par. Whilst the SA Report flagged a concern with the lowest growth scenario appraised at that stage on the basis of it representing an insufficiently proactive approach to growth in a Borough where there is strong development viability and therefore good potential to deliver net zero carbon developments, it does not necessarily follow that there is a clear case for flagging a concern with the lowest growth scenario appraised at this stage.
- 7.6.5 With regards to significant effects, at this stage it remains appropriate to give limited consideration to the DM policies within the Submission Local Plan, such that it remains appropriate to predict a ‘moderate or uncertain’ negative effect across all of the scenarios, as per the conclusion reached for all of the growth scenarios appraised in Section 6 of the SA Report (2024). In short, this reflects a view that built environment decarbonisation has not been a major factor informing spatial strategy / site selection.

7.7 Communities

Scenario 1 Additional urban allocations	Scenario 2 Scenario 1 + three sites	Scenario 3 Scenario 2 + one site	Scenario 4 Scenario 3 + one site	Scenario 5 Scenario 4 + one site	Scenario 6 Scenario 5 + three sites
★ 1	2	3	4	5	6

N.B. the aim of the discussion is to build upon (rather than repeat) the discussion under ‘Accessibility’.

7.7.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

“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.’”

7.7.2 As an initial point, there is a need to balance two key factors: A) under the lower growth scenarios, in particular Scenario 1, there is a risk of the Local Plan being found unsound such that the Borough is subject to the presumption in favour of sustainable development for the foreseeable future; and B) under the higher growth scenarios there would be considerable community concerns with the additional allocations, e.g. under Scenario 6 the number of greenfield allocations would increase from 3 (under Scenario 1) to 12 and the total number of homes delivered by greenfield allocations would double.

7.7.3 In summary, key considerations are:

- Scenario 1 – currently there are not known to be any significant concerns with any of the additional urban allocation options from a communities perspective (see discussion above under ‘accessibility’). However, there would clearly risk an unsound plan such that growth would likely come forward under the presumption in favour of sustainable development for the foreseeable future.
- Scenario 2 – the additional sites are not anticipated to raise significant community concerns, but there would be a risk of an unsound plan on the basis of an insufficiently positive approach to boosting supply.
- Scenario 3 – there is the potential to deliver community benefits alongside new homes, as discussed above under ‘accessibility’. Further considerations are: A) there was recently an informal pre-application consultation on a proposed scheme for Land at Priest Hill, and it can also be noted that the new Draft NPPF (2025) proposes a new ‘permanent presumption’ in favour of development in proximity to well-connected stations; and B) under this scenario there could still be a risk of an unsound plan due to an insufficiently proactive approach.
- Scenario 4 – there is the potential to deliver community benefits alongside new homes, as discussed above under ‘accessibility’. However, it is nonetheless the case that additional allocation of Downs Farm would likely generate significant concerns amongst the local community, including given the fragility of the remaining Green Belt gap to the east (as discussed above under ‘biodiversity’).
- Scenario 5 – the additional allocation under this scenario is a modest site that might generate limited community concern. However, on the other hand, the risk might be that development of this site would set a precedent for subsequent development of the site adjacent to the east (Hollywood Lodge), such that there is piecemeal growth that risks being sub-optimal in terms of securing community benefits.
- Scenario 6 – there would likely be community concerns, including in terms of impacting the gap between Epsom and Noble Park (to the west) and between Epsom and Epsom Downs (to the east), plus infrastructure capacity would likely be a concern. However, there are mitigating factors in that: A) Hollywood Lodge, could support a comprehensive approach to growth in this area that helps to ensure that impacts are mitigated and opportunities realised; and B) the larger of the two sites to the south east (Downs Road) could deliver significant new accessible greenspace.

7.7.4 In **conclusion**, it is considered appropriate to give weight to community concerns with higher growth, as per the approach taken in the SA Report, notwithstanding: A) a number of the sites that would be allocated to deliver higher growth are well suited to delivering community benefits alongside new homes; and B) under the higher growth scenarios there would be an increased chance of adopting a local plan such that the housing requirement would be set at a figure well below LHN for five years (so long as the Council is able to deliver on the requirement / maintain a five year housing land supply).

7.8 Economy and employment

Scenario 1 Additional urban allocations	Scenario 2 Scenario 1 + three sites	Scenario 3 Scenario 2 + one site	Scenario 4 Scenario 3 + one site	Scenario 5 Scenario 4 + one site	Scenario 6 Scenario 5 + three sites
6	5	4	3	2	1

7.8.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“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.’**”*

7.8.2 With regards to Scenario 1, some of the new urban allocation options that are a ‘constant’ across the growth scenarios are proposed to be mixed use, albeit in part to avoid or mitigate the commercial / community / leisure floorspace currently on site. With regards to the higher growth scenarios, none of the additional Green Belt allocation options would deliver significant new employment land, but the SA Report (2024) explained Downs Farm includes existing farm buildings used for offices as well as a warehousing and distribution business. The site promoters suggest a small ‘employment hub’, and overall the impact to existing employment uses would be modest.

7.8.3 Further consideration are then: A) the importance of minimising the gap to LHN, on the basis that providing for housing needs, including affordable housing, supports the local economy; and B) the need to take a suitably proactive approach to boosting housing land supply such that the Local Plan can be adopted and the policies contained within it with positive implications for the economy can be implemented.

7.8.4 In **conclusion**, on balance it is considered appropriate to rank the scenarios in order of growth quantum, as per the approach taken in the SA Report.

7.9 Historic environment

Scenario 1 Additional urban allocations	Scenario 2 Scenario 1 + three sites	Scenario 3 Scenario 2 + one site	Scenario 4 Scenario 3 + one site	Scenario 5 Scenario 4 + one site	Scenario 6 Scenario 5 + three sites
1	1	1	1	2	2

7.9.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“In conclusion, an overall **neutral effect is predicted... 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.’**”*

7.9.2 Taking the supply boost scenarios in turn:

- Scenario 1 – certain of the additional urban allocation options are known to be subject to a degree of constraint, with at least one including a listed building. However, when redeveloping or otherwise intensifying urban sites there is typically good potential to mitigate impacts or indeed deliver benefits.

- Scenario 2 – all three sites are subject to limited or low constraint, but the site to the south east is adjacent to housing with historic character (see [historic mapping](#)) and the SA Report (2024) noted: *“Another factor is protecting the relationship between historic Epsom Downs Racecourse and Epsom, including accounting for a historic Rifle Butts Alley, which passes [adjacent to the west]”*.
- Scenario 3 – the site added under this scenario (Land at Priest Hill) is subject to low constraint.
- Scenario 4 – the site added under this scenario (Downs Farm) is subject to a degree of constraint, with the SA Report (2024) explaining:

“[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.”

- Scenario 5 – the site added under this scenario (Noble Park) is modest in scale (capacity is perhaps 90 homes, but potentially less, e.g. accounting for a near adjacent SSSI, namely Epsom Common, and access challenges). The situation in respect of heritage constraint is complicated, as discussed in Section 5.4 of the SA Report (2024). The report explained that the site is:

“... [constrained] given a location between two components of the Hospitals Cluster Conservation Area. Indeed, it may also be that HOR007 [Noble Park] and HOR002 [Hollywood Lodge] fall within the Conservation Area, although this is unclear (as previously discussed in the Interim SA Report, 2023).”

A footnote then went on to explain: *“It is noted that the HOR007 [Noble Park] 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 [HOR007 and HOR002; see the Submission Local Plan policy map], 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.”*

- Scenario 6 – taking the three sites added under this scenario in turn:
 - Hollywood Lodge (50 homes) – this is site HOR002 located adjacent to the east of HOR007 such that it is within the West Park Conservation Area, as per the discussion above. The site was formerly the grounds of a large historic house which is now in ruins.
 - Land east of Burgh Heath Road (100 homes) – the SA Report (2024) explained that the site is *“... subject to limited constraint 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 valued position between Epsom and Epsom Downs.”*
 - Land near Downs Road east (160 homes) – the SA Report (2024) explained that the site is *“... 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.”*

7.9.3 In **conclusion**, the key consideration here is a concern with Scenarios 5 and 6 that would see development within the West Park Conservation Area, but it is difficult to suggest a significant concern. The SA Report (2024) predicted neutral effects for the equivalent higher growth scenarios at that stage but explained that this decision was “marginal”. Subsequently Historic England’s Regulation 19 representation did not make any comments on the proposed allocations or alternative growth scenarios.

7.10 Housing

Scenario 1 Additional urban allocations	Scenario 2 Scenario 1 + three sites	Scenario 3 Scenario 2 + one site	Scenario 4 Scenario 3 + one site	Scenario 5 Scenario 4 + one site	Scenario 6 Scenario 5 + three sites
6	5	4	3	2	1 

7.10.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

“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.”

N.B. the appraisal concluded a ‘moderate or uncertain’ negative effect for the plan as a whole despite having concluded a ‘significant’ negative effect for the spatial strategy / site allocations aspect of the plan.

7.10.2 As per the approach taken in 2024, there is a clear need to rank the current scenarios in order of total growth quantum, because there is support for boosting local plan housing supply as much as possible such that the housing requirement can be increased to reduce the gap to LHN and therefore reduce unmet need (recalling that none of the Borough’s neighbours have identified potential to provide for unmet need). It would not be appropriate to conclude support for Scenario 1 on the basis that it would could well result in an unsound plan such that the housing requirement is taken to be LHN leading to the Borough being subject to the presumption in favour of sustainable development for the foreseeable future.

7.10.3 Further considerations relate to the specific additional site allocation options:

- Deliverability – the majority of greenfield sites could likely deliver relatively early in the plan period, which is crucially important as the NPPF sets out that there must be a demonstrable five year housing land supply (as measured against the housing requirement, and with a ‘buffer’ applied as appropriate) at the point of plan adoption, and it is in the Borough’s interest to be confident that a five year land supply can be maintained over the early years of the plan period ahead of a supply boost through a new Local Plan. One of the variable sites is the subject of a live planning application, and several others are thought likely to be able to submit an application in the near future. The site promoters of all of the greenfield sites bar one have engaged proactively over the course of the plan-making process. Specifically, it is only the promoter of Hollywood Lodge that has not responded to the recent Local Plan consultation, although they have engaged with the Council in the past. The possibility of a coordinated scheme across Noble Park and Hollywood Lodge is something that could feasibly lead to an element of delay.
- Viability – all of the greenfield sites are relatively uncomplicated without readily apparent abnormal development costs likely to impact development viability and, in turn, the ability to deliver affordable housing alongside delivering on wider policy asks such as in respect of net zero development.
- Site-specific proposals – Cuddington Glade is currently the subject of a planning application for a care home, which is considered to be a positive; the promoters of Land at Priest Hill recently held a pre-application consultation that included a commitment to delivering 50% “family sized housing”; and the promoters of Noble Park made a clear commitment to delivering “at least 50% affordable homes” through the Regulation 19 representation in 2025.

- Specialist accommodation – the Submission Local Plan proposes that sites with a capacity above 200 homes should deliver specialist accommodation (namely accommodation for “*older citizens, those with disabilities, the neurodiverse, students or families more suited to multi-generational communal living*”) as well as Gypsy and Traveller pitches (so long as the Borough has an unmet need). Land at Priest Hill (275 homes) recently held a pre-application consultation and the proposal is not to deliver either specialist accommodation or Gypsy and Traveller pitches, although it should be noted that the scheme does propose to deliver benefits in several other respects (as discussed). Downs Farm is then the largest of the additional allocation option (530 homes) and there could be the potential to work with the site promoters to determine what the scheme should deliver, working within the parameters of viability.
- Affordable housing – it is important to be clear that virtually all affordable housing in the Borough over recent years and decades has been delivered by market led housing schemes, such that boosting the supply of market led housing schemes is a very proactive step in terms of affordable housing delivery. For example, the largest of the new allocation options – Downs Farm – could likely deliver the full policy quote of affordable housing, such that it alone could deliver more than 100 times the number of affordable homes delivered across the Borough in 2024/25 (see further discussion in Section 5.2).

- 7.10.4 In **conclusion**, it is appropriate to rank the scenarios in order of growth quantum, albeit acknowledging that in practice Scenario 1 (also potentially other scenarios) could lead to an unsound plan such that the Borough’s housing requirement is taken to be LHN (832 dpa) and, in turn, the Borough is subject to the presumption in favour of sustainable development, for the foreseeable future.
- 7.10.5 With regards to significant effects, the question is whether to predict significant negative effects (as per the equivalent growth scenarios appraisal in the SA Report) or ‘moderate or uncertain’ negative effects (as per the Draft Plan appraisal presented in Section 9 of the SA Report). The former approach is taken on balance, with the aim of emphasising the scale of unmet need across all of the scenarios.

7.11 Land, soils and resources

Scenario 1 Additional urban allocations	Scenario 2 Scenario 1 + three sites	Scenario 3 Scenario 2 + one site	Scenario 4 Scenario 3 + one site	Scenario 5 Scenario 4 + one site	Scenario 6 Scenario 5 + three sites
=	=	=	=	=	=

- 7.11.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):
- “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.”*
- 7.11.2 Focusing on agricultural land, Downs Farm is the only additional allocation option to have recently been in productive agricultural use, with the other greenfield additional allocation options appearing to have less agricultural potential, e.g. more suited to grazing horses or, in the case of Land at Priest Hill, sports pitches.
- 7.11.3 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 that does not extend north to cover Downs Farm.
- 7.11.4 There are two further considerations. Firstly, with regards to unmet need, it is fair to say that scenarios involving high levels of unmet need could 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.

7.11.5 In **conclusion**, at this stage it is difficult to conclude that the loss of agricultural land is a factor with a significant bearing on the appraisal, and so the alternative scenarios are ranked on a par.

7.12 Landscape

Scenario 1 Additional urban allocations	Scenario 2 Scenario 1 + three sites	Scenario 3 Scenario 2 + one site	Scenario 4 Scenario 3 + one site	Scenario 5 Scenario 4 + one site	Scenario 6 Scenario 5 + three sites
★ 1	★ 1	★ 1	2	3	4

7.12.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“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.”*

7.12.2 Taking the supply boost scenarios in turn:

- Scenario 1 – none of the urban additional allocation options are known to generate a significant concern in respect of landscape or townscape impacts.
- Scenario 2 – the two sites to the west are small sites that give rise to limited concerns. With regards to the site to the south east, whilst this is broadly a part of the Borough with a degree of landscape sensitivity, there is a need to account for containment by an adjacent site under construction to the south. 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.
- Scenario 3 – the site added under this scenario (Land at Priest Hill) has limited or low sensitivity.
- Scenario 4 – the site added under this scenario (Downs Farm) has a degree of landscape sensitivity, with the SA Report (2024) explaining:

“ 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.”
- Scenario 5 – the site added under this scenario (Noble Park) is located within a sensitive Green Belt parcel, in that this is a fragile gap between Epsom and Noble Park, 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, and it is noted that there is an adjacent long distance footpath, but there is thought to be limited visual appreciation of the site.
- Scenario 6 – taking the three sites added under this scenario in turn:
 - Hollywood Lodge (50 homes) – the situation is similar to Noble Park, although the long distance footpath is located to the west of Noble Park and so not adjacent to Hollywood Lodge. As has been discussed, there is a clear case for a comprehensive approach to growth across Noble Park and Hollywood Lodge, as opposed to a situation whereby one site comes forward and then the other comes forward in the near future, and the SA Report (2024) explained: *“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.”*

- Land east of Burgh Heath Road (100 homes) – the SA Report (2024) explained (in the context of the site being understood at the time to be available in full, whilst latest understanding is that only part is available): “... 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.”
- Land near Downs Road east (160 homes) – the SA Report (2024) explained: “... 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..., 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.” Expanding on this discussion, the concern at this stage, in light of the Green Belt Topic Paper Update (2026) is an extended finger of development along Downs Road that risks being incongruous.

7.12.3 In **conclusion**, landscape is a constraint to higher growth in the Borough, and so could serve as a reason for arguing support for Scenario 3 as a suitably proactive approach to boosting supply. Under Scenario 6 there would be concerns in respect of closing the landscape gap to Noble Park and eroding the landscape gap to Reigate and Banstead, but there would be merit in ensuring a plan-led approach to growth and ensuring that the Borough is in a position to avoid sub-optimal piecemeal urban expansion.

7.13 Transport

Scenario 1 Additional urban allocations	Scenario 2 Scenario 1 + three sites	Scenario 3 Scenario 2 + one site	Scenario 4 Scenario 3 + one site	Scenario 5 Scenario 4 + one site	Scenario 6 Scenario 5 + three sites
2	2	1 	2	2	3

N.B. the aim here is to build upon the discussion above under ‘accessibility’ and ‘air quality’.

7.13.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“In conclusion, it is appropriate to predict a **‘moderate or uncertain’ positive effect**.... 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.”*

7.13.2 With regards to Scenario 1, the additional urban allocation options are not thought to generate any significant transport concerns, either in isolation or in combination. With regards to the higher growth scenarios, none of the sites give rise to a significant concern when viewed in isolation, and there is a clear transport case to be made for supporting Land at Priest Hill, but Scenario 6 necessitate further work to confirm that growth would not lead to problematic traffic congestion (with implications for bus services and safe cycling), including within Reigate and Banstead District.¹²

7.13.3 Focusing on Downs Farm, as comfortably the largest of the site options currently under consideration, the SA Report (2024) concluded: “[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).” The connectivity score within the centre of the site is quite low (42), but it is higher at the edge of the site adjacent to A-roads and there are opportunities to deliver transport upgrades (as discussed).

¹² At the time of writing it is understood that transport modelling work has been undertaken that has considered growth scenario 5 and concluded no major concerns regarding problematic traffic congestion, on the basis of a series of mitigation assumptions.

- 7.13.4 In **conclusion**, Scenario 3 is considered to represent a suitably proactive approach to directing supply to locations that perform well in transport and accessibility terms. Scenario 4 would then see additional allocation of Downs Farm, which is a less accessible location within the Borough, but still in proximity to a train station, and transport opportunities have been highlighted through recent IDP work. Scenario 5 gives rise to limited additional concerns (although there is a need for further work to confirm access arrangements, as discussed under 'accessibility'), but Scenario 6 would involve directing growth to locations that perform relatively poorly in transport and accessibility terms. On the other hand, there is merit in Scenario 6 in that: A) Downs Road is a 'medium priority' corridor for cycle infrastructure upgrades within the [LCWIP](#) and the B280 (which links to Noble Park / Hollywood Lodge) is a high priority corridor for walking infrastructure upgrades; B) there could be merit in comprehensive growth within the west of the Borough, including in terms of transport infrastructure; and C) there is a clear transport case to be made for minimising unmet need, as discussed above under 'air quality'.

7.14 Water

Scenario 1 Additional urban allocations	Scenario 2 Scenario 1 + three sites	Scenario 3 Scenario 2 + one site	Scenario 4 Scenario 3 + one site	Scenario 5 Scenario 4 + one site	Scenario 6 Scenario 5 + three sites
=	=	=	=	=	=

- 7.14.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“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.”*

- 7.14.2 Focusing on the capacity of sewage treatment works, the SA Report (2024) concluded no major concerns under any of the growth scenarios appraised at that time, and explained that Thames Water had provided the following statement when consulted on the Infrastructure Delivery Plan (IDP):

“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.”

- 7.14.3 This quote serves to highlight the importance of providing water companies with early certainty regarding the scale and location of growth in any given area to inform long-term planning for sewage treatment. Also, this is similarly the case with long term planning for water supply, which is an issue in several parts of the country at the time of writing, although not thought to be an issue affecting Epsom and Ewell.
- 7.14.4 The Regulation 19 representation received from the Environment Agency did not raise any significant concerns and this was similarly the case for representation received from Thames Water (a RAG assessment was provided that considered each of the proposed allocations in turn).
- 7.14.5 The latest situation is then set out in the updated IDP (2026) as follows:

“Thames water provided the following on the 19 March - “In relation to increasing the housing requirements in the local plan to 5,700 homes we are aware of capacity constraints at the STW serving the area. Further assessment is progressing with a view to delivering any upgrade when required during the local plan period taking account of the growth within Epsom and Ewell and other local authorities within the same catchments. However, we do not envisage a significant issue with supporting the increased levels of growth.”

7.14.6 In **conclusion**, at this stage it is considered appropriate to rank the scenarios on a par.

7.15 Appraisal summary

- 7.15.1 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).
- 7.15.2 The appraisal shows a mixed picture, with all scenarios associated with pros and cons, and the next step is to consider what weight to give to specific topics and then, in turn, reach a conclusion on which of the scenarios best represents sustainable development on balance.
- 7.15.3 Finally, it is important to re-emphasise the importance of progressing the Local Plan to adoption, recognising that the baseline scenario is one whereby growth comes forward in the absence of an up to date Local Plan and therefore under the presumption in favour of sustainable development.

Table 7.1: Growth scenarios appraisal summary

Scenario	Scenario 1 Additional urban allocations	Scenario 2 Scenario 1 + three sites	Scenario 3 Scenario 2 + one site	Scenario 4 Scenario 3 + one site	Scenario 5 Scenario 4 + one site	Scenario 6 Scenario 5 + three sites
Topic	Order of preference (numbers) and predicted significant effects (shading)					
Accessibility	2	2	★1	★1	★1	★1
Air quality	=	=	=	=	=	=
Biodiversity	★1	★1	★1	★1	2	3
CC adaptation	=	=	=	=	=	=
CC mitigation	=	=	=	=	=	=
Communities	★1	2	3	4	5	6
Economy / emp.	6	5	4	3	2	★1
Historic env.	★1	★1	★1	★1	2	2
Housing	6	5	4	3	2	★1
Land and soils	=	=	=	=	=	=
Landscape	★1	★1	★1	2	3	4
Transport	2	2	★1	2	2	3
Water	=	=	=	=	=	=

Part 3: What are the next steps?

8 Examination in public

- 8.1.1 Subsequent to the current consultation the Inspector will give consideration to next steps. If a decision is made that the examination can continue then there would be a further consultation on proposed modifications to the Local Plan (as previously submitted).