

Epsom and Ewell Local Plan

Habitats Regulations Assessment Addendum Report

April 2026



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Epsom and Ewell Local Plan

Habitats Regulations Assessment – Addendum

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Front Cover: Mole Gap to Reigate Escarpment SAC, Box Hill

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Acronyms & Abbreviations

| | |
|--------------|---|
| AA | Additional Modification |
| AIOSI | Adverse Impacts on Site Integrity |
| CAMS | Catchment Abstraction Management Strategy |
| DLP | Land Availability Assessment |
| EiP | Examination in Public |
| HRA | Habitats Regulations Assessment |
| LPA | Local Planning Authority |
| LSE | Likely Significant Effects |
| RBMP | River Basin Management Plan |
| SAC | Special Area of Conservation |
| SPA | Special Protection Area |
| WRMP | Water Resource Management Plan |

1 Introduction

1.1 Context

- 1.1.1 Epsom and Ewell Borough Council (the Council) submitted its Local Plan¹ to the Secretary of State for public examination on 10 March 2025. Lepus Consulting prepared a Final Habitats Regulations Assessment (HRA) in support of the Submission Local Plan in February 2025².
- 1.1.2 During the Local Plan examination hearings in October 2025, the Inspector raised concerns regarding the proposed quantum of development to be delivered by the Local Plan, and the robustness of some components within the supporting evidence base.
- 1.1.3 In response, the Council committed to undertake two discrete pieces of additional evidence work: a review of sites discounted within the Land Availability Assessment (LAA), including the reassessment of sites previously excluded at Stage 2 on the basis of availability; and, a review and update of the Green Belt evidence base, in particular the site-specific exceptional circumstances assessment (Topic Paper TP02), to address identified inconsistencies, errors, and issues in the application of the methodology. These updates were subsequently prepared and submitted to the Inspector in January 2026.
- 1.1.4 Following submission of this additional evidence, further [correspondence](#) between the Council and the Planning Inspectorate resulted in a request for additional work to consider the suitability of specific urban and Green Belt sites for potential allocation within the Local Plan.
- 1.1.5 As a result, the Council is required to produce, among other documents, an addendum to the February 2025 Final HRA Report. This Addendum will consider the implications of the potential additional growth and assess whether this will alter the conclusions previously set out in the Final HRA (February 2025).

1.2 Purpose of this report

- 1.2.1 This HRA Addendum Report forms part of the series of HRA reports that have been prepared to document the iterative HRA process and supplements the earlier HRA outputs delivered alongside preparation of the Epsom and Ewell Local Plan as listed below.
- The Draft Local Plan Regulation 18 HRA: Preferred Options (January 2023)³;

¹ Epsom and Ewell Borough Council (December, 2024) Proposed Submission Epsom & Ewell Local Plan 2022 – 2040 – Regulation 19.

² Epsom and Ewell Borough Council (February 2025). Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Final Habitats Regulations Assessment. Available at https://www.epsom-ewell.gov.uk/sites/default/files/documents/residents/planning/planning-policy/other-planning-documents/examination/SD04a%20Final%20HRA%20Report%20Reg%2019%20Feb%2025_Copy.pdf [Date accessed: 23/03/26].

³ Epsom and Ewell Borough Council (January 2023). Habitats Regulations Assessment of the Epsom and Ewell Draft Local Plan, Public Consultation: Regulation 18. Available at https://epsom-ewell.inconsult.uk/draftlocalplan2022_2040/consultationHome [Date accessed: 23/03/26].

- The Publication Plan Regulation 19 Interim HRA (November 2024)⁴; and
- The Publication Plan Submission HRA (February 2025)⁵.

1.2.2 This HRA Addendum Report has been prepared in order to consider the addition of approximately 1,000 dwellings (both urban and Green Belt sites) for potential inclusion in the Local Plan to ensure soundness of the Local Plan. This HRA Addendum Report focuses on whether the addition of these sites will result in new Likely Significant Effects (LSEs) upon any European Site, and whether the conclusions of the February 2025 Final HRA remain valid.

1.2.3 This HRA Report does not reproduce the contents of the earlier HRA reports (**Chapter 2**) and should be read in conjunction with them. The additional sites have been evaluated through the HRA process for new LSEs and / or to determine whether their addition would result in a change to the findings of the HRA reports prepared in support of the plan-making process.

⁴ Epsom and Ewell Borough Council (November 2024). Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Publication Plan 2019: Interim Habitats Regulations Assessment. Available at Epsom and Ewell Borough Council (February 2025). Habitats Regulations Assessment of the Epsom and Ewell Local Plan [Date accessed: 23/03/26].

⁵ Epsom and Ewell Borough Council (February 2025). Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Final Habitats Regulations Assessment. Available at https://www.epsom-ewell.gov.uk/sites/default/files/documents/residents/planning/planning-policy/other-planning-documents/examination/SD04a%20Final%20HRA%20Report%20Reg%2019%20Feb%2025_Copy.pdf [Date accessed: 23/03/26].

2 The Epsom and Ewell Local Plan and the HRA process

2.1 Summary of HRA outputs

2.1.1 This HRA Addendum Report forms the latest stage of a series of reports that have been prepared to document the iterative HRA process. Such an approach enables the Council to demonstrate that the HRA has been undertaken at all stages of the plan making process. To date, this has included the following:

2.1.2 The **Draft Local Plan Regulation 18 HRA: Preferred Options** (January 2023)⁶ included a scoping assessment of European sites and an initial screening assessment of Local Plan policies.

2.1.3 The **Publication Plan Regulation 19 Interim HRA** (November 2024)⁷ provided an updated screening assessment and identified LSEs at the following European sites which triggered the need for an Appropriate Assessment (AA) of policies and allocations within the Publication Local Plan.

- Mole Gap to Reigate Escarpment SAC – air quality and recreational pressure;
- South West London Waterbodies SPA – water quantity;
- South West London Waterbodies Ramsar – water quantity; and
- Wimbledon Common SAC – water quantity.

2.1.4 The Publication Plan Regulation 19 Interim AA focused on hydrological, air quality and recreational impacts at a number of European sites. The Interim HRA concluded no adverse impacts, however, was not able to reach a conclusion regarding potential adverse air quality impacts upon the site integrity of Mole Gap to Reigate Escarpment SAC due to timescales associated with the collation of air quality modelling data.

2.1.5 The **Final HRA** (February 2025)⁸ was prepared to inform the Submission Local Plan. The Final HRA included a review of air quality modelling undertaken to inform an AA. It concluded no adverse impacts on the site integrity at any European site due to a change in air quality, water quality, or quantity or an increase in recreational pressure, as a result of the Local Plan either alone or in-combination

6 Epsom and Ewell Borough Council (January 2023). Habitats Regulations Assessment of the Epsom and Ewell Draft Local Plan, Public Consultation: Regulation 18. Available at https://epsom-ewell.inconsult.uk/draftlocalplan2022_2040/consultationHome [Date accessed: 23/03/26].

7 Epsom and Ewell Borough Council (November 2024). Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Publication Plan 2019: Interim Habitats Regulations Assessment. Available at Epsom and Ewell Borough Council (February 2025). Habitats Regulations Assessment of the Epsom and Ewell Local Plan [Date accessed: 23/03/26].

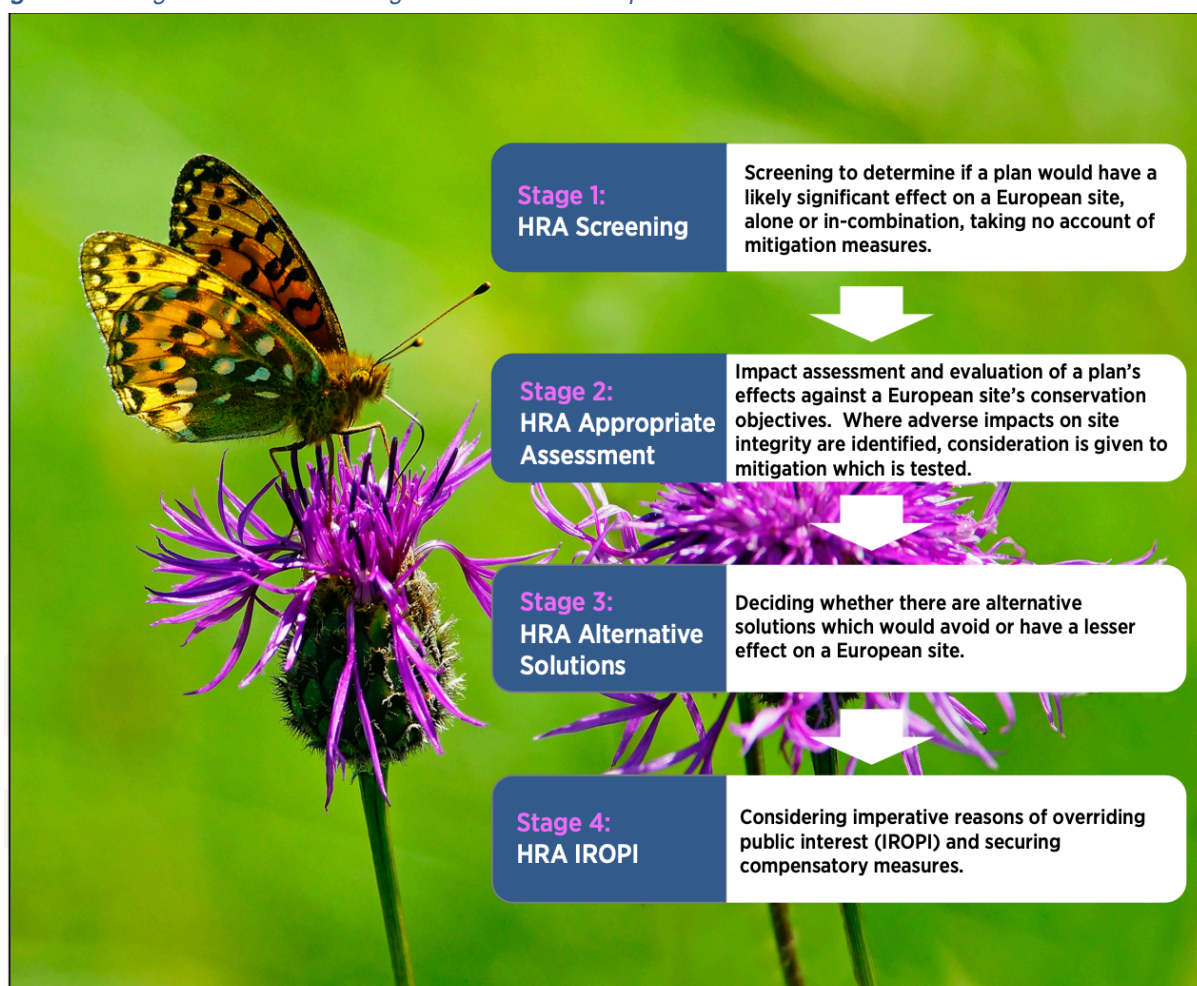
8 Epsom and Ewell Borough Council (February 2025). Habitats Regulations Assessment of the Epsom and Ewell Local Plan, Final Habitats Regulations Assessment. Available at https://www.epsom-ewell.gov.uk/sites/default/files/documents/residents/planning/planning-policy/other-planning-documents/examination/SD04a%20Final%20HRA%20Report%20Reg%2019%20Feb%2025_Copy.pdf [Date accessed: 23/03/26].

3 Methodology

3.1 Overview

- 3.1.1 This HRA report is part of a sequence of assessment phases which began in 2023 (see **Chapter 2**). It focuses on changes recommended by the planning inspector through the examination hearings to ensure the plan is sound (**Chapter 1**). Unless otherwise stated, all assessment findings reported in the Final HRA (February 2025), remain the same.
- 3.1.2 HRA is a rigorous precautionary process centred around the conservation objectives of a European site's qualifying interests. It is intended to ensure that European sites are protected from impacts that could adversely affect their integrity. A step-by-step guide to the methodology followed for the HRA is illustrated in **Figure 3.1**.

Figure 3.1: Stages in the Habitats Regulations Assessment process



- 3.1.3 Using the HRA methodology outlined in Chapter 2 of the 2025 Final HRA report, additional sites have been evaluated to determine whether they would result in a new LSE or trigger a change to the conclusions of the Final 2025 HRA report (**Chapter 2**). The output of this assessment is reported in **Chapter 4** and **Chapter 5**.

4 Screening

4.1 Introduction

4.1.1 The first stage in the HRA process comprises the screening stage (see **Figure 3.1**). The purpose of screening is to determine whether there are any aspects of the Local Plan which may lead to a Likely Significant Effect (LSE) at a European site, either alone or in combination with other plans or projects.

4.1.2 The 2025 screening assessment concluded LSE on the following European sites from all policies which triggered growth in the Plan area:

- Mole Gap to Reigate Escarpment SAC – air quality and recreational pressure LSEs;
- South West London Waterbodies SPA – water quantity LSEs;
- South West London Waterbodies Ramsar – water quantity LSEs;
- Wimbledon Common SAC – water quantity LSEs.

4.1.3 The location of all potential additional sites which have been considered in this HRA Addendum are detailed in **Table 4.1** and **Table 4.2** and illustrated on **Figure 4.1**.

4.1.4 All potential additional sites have been screened for their potential to have an LSE upon a European site as detailed in the methodology set out in Chapter 2 of the Final HRA Report (2025). This screening assessment takes into consideration case law and best practice.

Table 4.1: Potential additional Green Belt site allocations

| Site name | Number of dwellings | Screening conclusion |
|---|-----------------------|-----------------------|
| Downs Farm (north parcel), Reigate Road | 530 dwellings | Category L: Screen in |
| Land off Cuddington Glade | 30-50 dwellings | Category L: Screen in |
| Land off Oak Glade | 70 bed care home (C2) | Category L: Screen in |
| Land to west of Burgh Heath Road | 50 dwellings | Category L: Screen in |
| Noble Park Extension | 90 dwellings | Category L: Screen in |
| Land at Priest Hill | 300 dwellings | Category L: Screen in |

Table 4.2: Potential additional urban site allocations

| Site name | Number of dwellings | Screening conclusion |
|---------------------------------|---------------------|-----------------------|
| 25 Alexandra Road Epsom, Surrey | 11 dwellings | Category L: Screen in |

| Site name | Number of dwellings | Screening conclusion |
|--|---------------------|--------------------------|
| 47 Cheam Road, Ewell | 5 dwellings | Category L: Screen in |
| 85b Hook Road, Epsom | 8 dwellings | Category L: Screen in |
| Auction House, Depot Road | 10 dwellings | Category L: Screen in |
| Conservation Club, Epsom Club and Church | 28 dwellings | Category L: Screen in |
| Eclipse Business Park, West Hill | 23 dwellings | Category L: Screen in |
| Gainsborough Road estate, Epsom | 8 dwellings | Category L: Screen in |
| Laine Theatre Arts | 6 dwellings | Category L: Screen in |
| Land R/O The Albion Public House (McCaffertys Bar) | 11 dwellings | Category L: Screen in |
| Land west of Ewell By-Pass | 38 dwellings | Category L: Screen in |
| Parking at 54 Gainsborough Road | 6 dwellings | Category L: Screen in |
| Spread Eagle Shopping Centre | 22 dwellings | Category L: Screen in |
| TKMaxx | 17 dwellings | Category L: Screen in |

Table 4.3: Additional employment floorspace

| Site name | Employment area (m ²) | Screening conclusion |
|-----------------------------|-----------------------------------|--------------------------|
| Kiln Lane Industrial Estate | 11,000 | Category L: Screen in |
| Longmead Industrial Estate | 12,000 | Category L: Screen in |

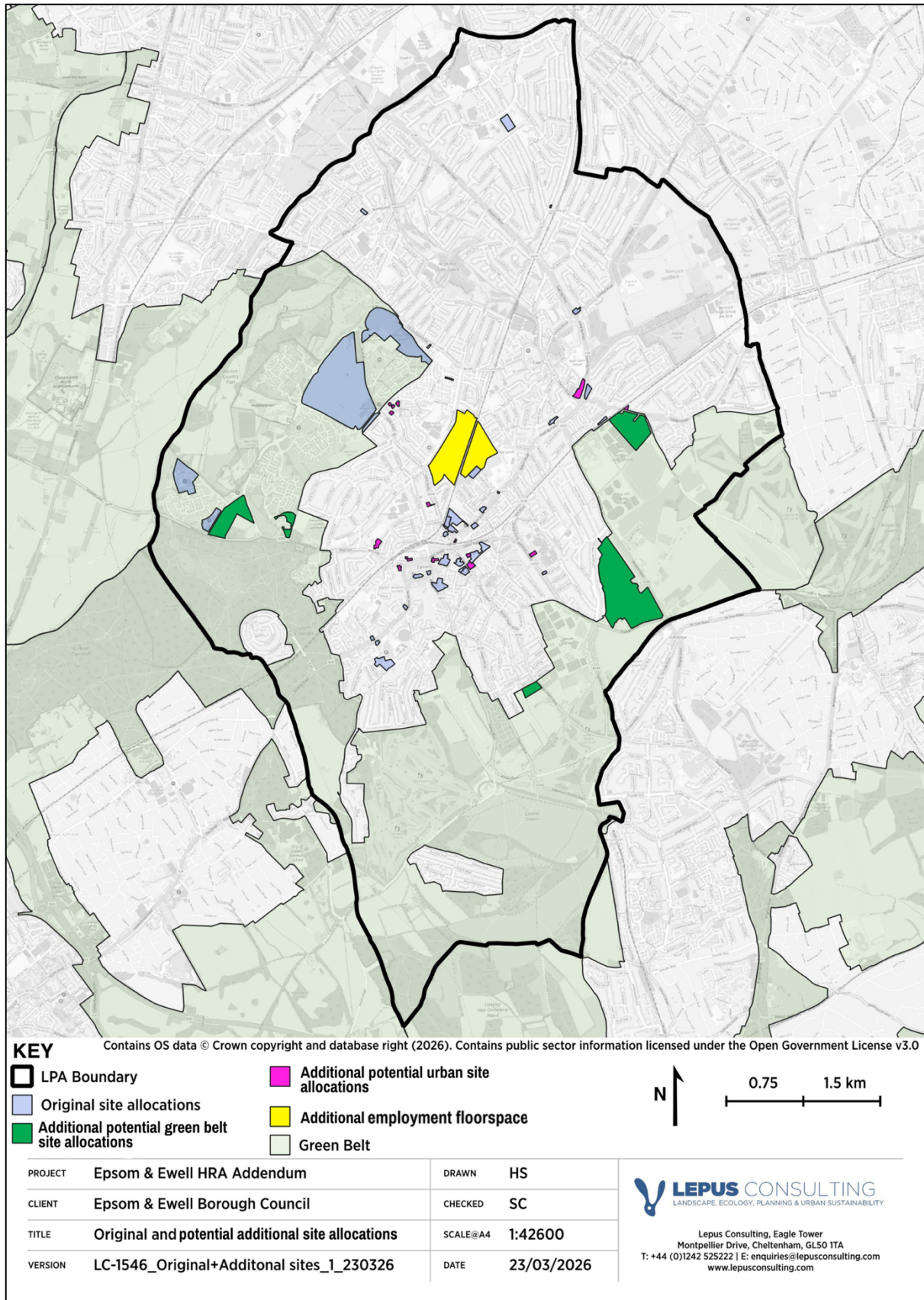


Figure 4.1: Original and potential additional site allocations in the Epsom and Ewell Local Plan

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- 4.1.5 Column three in **Tables 4.1** and **4.2** provide the output of the screening exercise. All potential additional site allocations have been screened into the HRA process given their potential for LSEs in-combination with other plans and projects (as detailed in Appendix A of the Final HRA Report).
- 4.1.6 The screening assessment takes no account of mitigation measures that the Local Plan may incorporate to mitigate adverse impacts upon European sites.
- 4.1.7 It is therefore concluded that all potential additional site allocations will be screened into the HRA process. LSEs are considered to be the same as concluded in the 2025 Final HRA Report (as listed at **paragraph 4.1.2**). The next stage of the HRA process will be Stage 2 – Appropriate Assessment (**Figure 3.1**).

5 Appropriate Assessment

5.1 Air quality Appropriate Assessment

- 5.1.1 Site allocations set out in the Local Plan, cumulatively with potential additional site allocations considered in this Addendum report, have the potential to act cumulatively and in-combination with neighbouring growth to increase traffic flows on the local and wider road network. A change in traffic flows has the potential to result in a deterioration in air quality at European sites with adverse effects on site integrity.
- 5.1.2 Air quality dispersion modelling was undertaken to inform the air quality AA undertaken as part of the Final HRA Report (February 2025). The impact of air pollution was considered in relation to the Mole Gap to Reigate Escarpment SAC in relation to traffic flows on the B2032 where it runs within 200m of the designation.
- 5.1.3 Air quality dispersion modelling was undertaken on the basis of traffic data that was derived from the SINTRAM74 transport model. The air quality dispersion modelling informed a detailed locally based and spatial air quality assessment for a number of air pollutants including nitrogen oxides, ammonia, nutrient nitrogen deposition and acid deposition at the SAC.
- 5.1.4 Natural England's guidance to Local Planning Authorities on the assessment of road traffic emissions under the Habitats Regulations was applied in the air quality AA⁹. This took into consideration modelled pollutant levels in relation to the distribution of qualifying features across the SAC, the SAC's conservation objectives, background pollution levels and pollutant trends. The Final HRA AA (2025) concluded that there would be no adverse impact on site integrity as a result of the Local Plan either alone or in-combination.
- 5.1.5 Traffic modelling has been updated to take into consideration the cumulative impact of allocations set out in the Submitted Local Plan in combination with the potential additional site allocations considered in this Addendum HRA report and as set out in **Figure 4.1**.

⁹ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). Available at:

<http://publications.naturalengland.org.uk/publication/4720542048845824> [Date Accessed: 27/03/26].

5.1.6 As set out in the Air Quality Update Note (**Appendix A**) the revised traffic data shows a small reduction in traffic along the B2032 in a scenario with the additional allocations in place (in-combination with other sites set out in the Local Plan). The Air Quality Update Note indicates that while there is no plausible reason to expect the potential additional allocations to reduce traffic on the B2032, there is also no plausible reason to expect a significant increase. The effect on the relevant section of the B2032 is therefore essentially neutral. The air quality update concludes that if the revised traffic data were taken through to the air quality model, the impacts would be slightly smaller than those predicted previously and as reported in the Final HRA Report. The existing air quality predictions as reported in the Final HRA Report (2025) therefore continue to provide a robust indication of the effects of the Plan with the potential additional site allocations. It can therefore be summarised that the conclusions of the Final HRA Report remain valid and there will be no adverse impact on the site integrity of Mole Gap to Reigate Escarpment SAC, either alone or in-combination, from a change in air quality due to the Local Plan, including the potential additional site allocations (**Figure 4.1**).

5.2 Water Quality and Water Quantity Appropriate Assessment

5.2.1 Development can reduce catchment permeability, and the presence of drainage networks may be expected to remove runoff from urbanised catchments. This may result in changes in run off rates from urbanised areas to European sites or watercourses which connect to them and therefore a change in water levels. Water mains leakage and sewer infiltration may also affect water levels. In addition, supply to meet water demand associated with new development (supported by the Local Plan) also has the potential to affect water balances at hydrologically sensitive European sites which are connected to the Plan area.

5.2.2 The potential effects of a change in water quantity due to Local Plan development on the South West London Waterbodies SPA, South West London Waterbodies Ramsar and Wimbledon Common SAC were evaluated as part of the Final HRA (February 2025).

5.2.3 Details on the conservation objectives for each of these European sites are presented in Section 6.2 of the Final HRA Report.

5.2.4 The Final HRA AA took into account the high-level regulatory water quantity protective framework which address Local Plan and in-combination growth in neighbouring areas including:

- Thames Basin River Basin Management Plan (RBMP)¹⁰,
- Thames Water Resource Management Plan (WRMP)¹¹
- SES Water WRMP¹²
- Thames Water Drought Plan¹³

¹⁰ Environment Agency (2022) Thames river basin district river basin management plan: updated 2022. Available at: <https://www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022> [Date Accessed: 27/03/26].

¹¹ Thames Water (2024) Water Resources Management Plan 2024. Available at <https://www.thameswater.co.uk/about-us/regulation/water-resources> [Date Accessed: 27/03/26].

¹² SES Water (2022) Water Resources Management Plan 2025-2075. Available at: <https://seswater.co.uk/about-us/publications/our-water-resources-management-plan> [Date Accessed: 27/03/26].

¹³ Thames Water (2022) <https://www.thameswater.co.uk/about-us/regulation/drought-plan> [Date Accessed: 27/03/26].

- SES Water Drought Plan¹⁴
- Environment Agency Catchment Abstraction Management Strategy (CAMS) process

5.2.5 It also took into consideration Local Plan requirements for new development set out in policy wording.

5.2.6 Policy DM11 – Sustainable Water Use – of the Local Plan recognises that the Plan area is located within an area classified as being seriously water stressed. This policy therefore requires all homes to meet water efficiency targets to achieve sustainable water use. Policy S16 – Flood Risk and Sustainable Drainage – requires development to use nature-based solutions such as Sustainable Drainage Systems to reduce surface run off. Policy DM18 – Pollution and Contamination – requires incorporation of good design in new development in relation to water discharges. Other policies such as Policy S3 – Climate Change – also set out requirements for new development to maximise sustainable water use.

5.2.7 Local policy will work together with the high-level water regulatory framework set out in **paragraph 5.2.4** to ensure sufficient water is available for both the environment and people.

5.2.8 Taking into consideration the high-level protective water planning framework and protective Local Plan policies, it can therefore be concluded that there will be no adverse impacts on site integrity on the South West London Waterbodies SPA, South West London Waterbodies Ramsar or Wimbledon Common SAC either alone or in-combination due to a change in water quantity as a result of the Local Plan, including the potential additional site allocations shown on **Figure 4.1**.

5.2.9 It can therefore be concluded that there will be no change to the overall conclusions of the 2025 Final HRA report in light of the potential additional site allocations.

5.3 Recreation Pressure Appropriate Assessment

5.3.1 Increased recreational pressure at European sites can result in damage to habitats and changes in behaviour to animals such as birds at nesting and feeding sites. This can be caused by erosion and compaction, troubling of grazing stock, spreading of invasive species, dog fouling, and tree climbing among other recreational impacts. Typically, disturbance of habitat and species is the unintentional consequence of people's presence which can impact distribution of habitat types and breeding success and survival. Increased development has the potential to increase recreational pressures upon European sites which are accessible to the public.

¹⁴ SES Water (2022) Drought Plan 2022. Available at: <https://www.seswater.co.uk/about-us/news-and-resources/publications/our-drought-plan> [Date Accessed: 27/03/26].

- 5.3.2 The effects of increased recreational pressure upon the Mole Gap to Reigate Escarpment SAC due to Local Plan growth were evaluated as part of the Final HRA (February 2025). The 2025 HRA took into consideration the availability of alternative recreational space locally, barriers to movement and Local Plan policy requirements in terms of open spaces. Taking these factors into consideration, it concluded that there would be no adverse impact on the site integrity at any European site due to an increase in recreational pressure as a result of the Local Plan either alone or in-combination.
- 5.3.3 Details on the sensitivities of Mole Gap to Reigate Escarpment SAC are set out in Section 7.2 of the Final HRA Report.
- 5.3.4 A review of the location of potential residential site allocations considered in this Addendum HRA Report indicates that are several road links which provide a barrier to the movement of people between the Plan area and the Mole Gap to Reigate Escarpment SAC including the M25.
- 5.3.5 Alternative recreational opportunities considered in the Final HRA Report included Epsom and Walton Downs and a Woodland Trust site (Langley Vale Wood), Epsom Common, Ashtead Common and Prince's Coverts.
- 5.3.6 As set out in the 2025 Final HRA Report, Policy DM19 (Open Space, Sport and Recreation) of the Local Plan requires all development which would result in a net increase in residential units to contribute towards open space, sport and recreation either through financial contributions or on-site provisions. Where open space is provided through a development site, Policy DM19 requires that it include long term stewardship arrangements to secure the quality of open space in perpetuity.
- 5.3.7 Policy DM19 also safeguards local green space from development. Policy S18 (Green and Blue Infrastructure) requires development to contribute towards an accessible and integrated green and blue infrastructure network to improve wellbeing of new residents.
- 5.3.8 At a more strategic level, the Surrey Hills National Landscape management plan¹⁵ sets out measure to manage recreational impacts. These measures include education for users to raise awareness of the importance of biodiversity within this National Landscape.
- 5.3.9 Taking into consideration barriers to movement of people to the SAC from the Plan area, Local Plan mitigation policy in terms of open green space provision, alternative recreational destinations in closer proximity to the Plan area and strategic level recreational management, it is concluded that the Local Plan, including the potential additional site allocations illustrated in **Figure 4.1**, will have no adverse impact on site integrity at the Mole Gap to Reigate Escarpment SAC, either in-combination with other plans and projects (Appendix A of the Final HRA Report), due to increased recreational pressure.

¹⁵ Surrey Hills (2020) Surrey Hills Area of Outstanding Natural Beauty Surrey Hills Management Plan 2020 – 2025. Available at: <https://surreyhills.org/wp-content/uploads/2022/11/Surrey-Hills-Management-Plan-Web-72-SP-1-2.pdf> [Date Accessed: 27/03/26].

6 Conclusion and next steps

6.1 Summary

6.1.1 This Addendum HRA Report has been prepared to consider potential additional urban and Green Belt sites that have been identified in response to comments raised in the EiP for inclusion in the Local Plan. It focuses on whether the addition of these sites will result in LSEs upon any European Site, and whether the conclusions of the February 2025 Final HRA remain valid.

6.1.2 This Addendum report should be read in conjunction with other HRA outputs prepared to support the Local Plan.

6.1.3 Taking no account of mitigation, the screening assessment concluded that the additional sites have the potential to result in LSEs upon the following European sites:

- Mole Gap to Reigate Escarpment SAC – air quality and recreational pressure;
- South West London Waterbodies SPA – water quantity;
- South West London Waterbodies Ramsar – water quantity;
- Wimbledon Common SAC – water quantity.

6.1.4 The HRA therefore progressed to the next stage of the HRA process: AA. The following matters were explored in more detail:

- Impacts on designated features affected by a possible deterioration in air quality;
- Impacts on water quantity associated with increased levels of built development; and
- Impacts associated with increased recreational pressure,

6.1.5 The AA of potential additional sites cumulatively with development in the Local Plan has concluded no adverse impacts on site integrity at any European site due to a change in air quality, water quantity or an increase in recreational pressure as a result of the Local Plan, either alone or in-combination.

Appendix A: AQ Update Note

AIR QUALITY UPDATE

Our Ref: 16267B-10-L01-01-F

30 March 2026

For:

 (Lepus Consulting) Ltd

SUBJECT: HABITATS REGULATION ASSESMENT FOR EPSOM AND EWELL LOCAL PLAN

In 2024 Air Quality Consultants (AQC) | Part of Logika Group prepared a modelling assessment of the impacts of road traffic using the B2032 on the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC), in order to inform the Habitats Regulations Assessment (HRA) addendum for the Epsom and Ewell Local Plan 2022-2040 (ref. J10/16267A/10-F1). Since this assessment was prepared, the quantum of development, and therefore the potential traffic generation, has changed, requiring a HRA addendum to address the implications of the potential additional growth.

AQC has both reviewed the updated traffic data provided by Surrey County Council and discussed the data with Surrey County Council. The changes to site allocations are all a considerable distance from the relevant section of the B2032. Given the locations of these allocations, there is no reason to expect that additional traffic associated with these sites would use the B2032. Notwithstanding this, because of the way the traffic model works, making changes in one part of the network can often have a small effect on traffic flows on others. This is often termed 'model noise'. When comparing the latest flows with those used in the 2024 assessment, there is a small reduction in traffic. When factored to represent an Annual Average Daily Traffic (AADT), this is a reduction of 135 vehicles per day.

While there is no plausible reason to expect the new allocations to reduce traffic on the B2032, there is also no plausible reason to expect a significant increase. The effect on the relevant section of the B2032 is therefore essentially neutral.

If the revised traffic data were taken through to the air quality model, the impacts would be slightly smaller than those predicted previously. The existing air quality predictions therefore continue to provide a robust indication of the effects of the Plan, either without or with the additional allocations.

Issued by:  (Associate)

Approved by:  (Director – Air Quality Modelling and Assessment)

Date: 30 March 2026



Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys

Biodiversity Net Gain



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