

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

Interim SA Report

January 2023



Quality information:

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1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the new Epsom and Ewell Local Plan (hereafter referred to as “the new Local Plan”). Once adopted, the new Local Plan will set the strategy for growth and change for the borough up to 2040, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.
- 1.1.2 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 SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 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 appraises the effects of implementing “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 next steps?

1.3 This Interim SA Report²

- 1.3.1 At this current stage of the plan-making process, the Council is consulting on a first draft version of the new Local Plan under Regulation 18 of the Local Planning Regulations.
- 1.3.2 This interim SA Report is therefore published with the intention of informing the consultation and subsequent preparation of the final draft (‘proposed submission’) version of the plan.

Structure of this report

- 1.3.3 Despite this being an ‘Interim’ SA Report, as opposed to the formally required SA Report, it is nonetheless helpful to structure this report according to the **three questions** above.
- 1.3.4 Before answering the first question, there is a need to further set the scene by setting out:
- the plan scope; and
 - the scope of the SA.

Commenting on this report

- 1.3.5 This report can be referenced as part of comments on the draft plan and/or comments can be made specifically on any part of this report. Further guidance is provided below, including under ‘next steps’.

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

² See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report and, in turn, this Interim SA Report, as well as a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

2 The plan scope

2.1 Introduction

- 2.1.1 The aim here is to briefly introduce the: context to plan preparation, including the current adopted local plan for Epsom and Ewell; the plan area (ahead of more detailed discussion elsewhere in the report); the plan period; and the objectives that are in place to guide plan preparation (the 'plan scope').

2.2 Context to plan preparation

- 2.2.1 Once in place the new Local Plan will be known as the Epsom and Ewell Local Plan 2022-2040, and will largely supersede the adopted local plan, comprising the Core Strategy (2007), Epsom Town Centre Area Action Plan (2011) and Development Management Policies Document (2015).

- 2.2.2 Wider key context comes from:

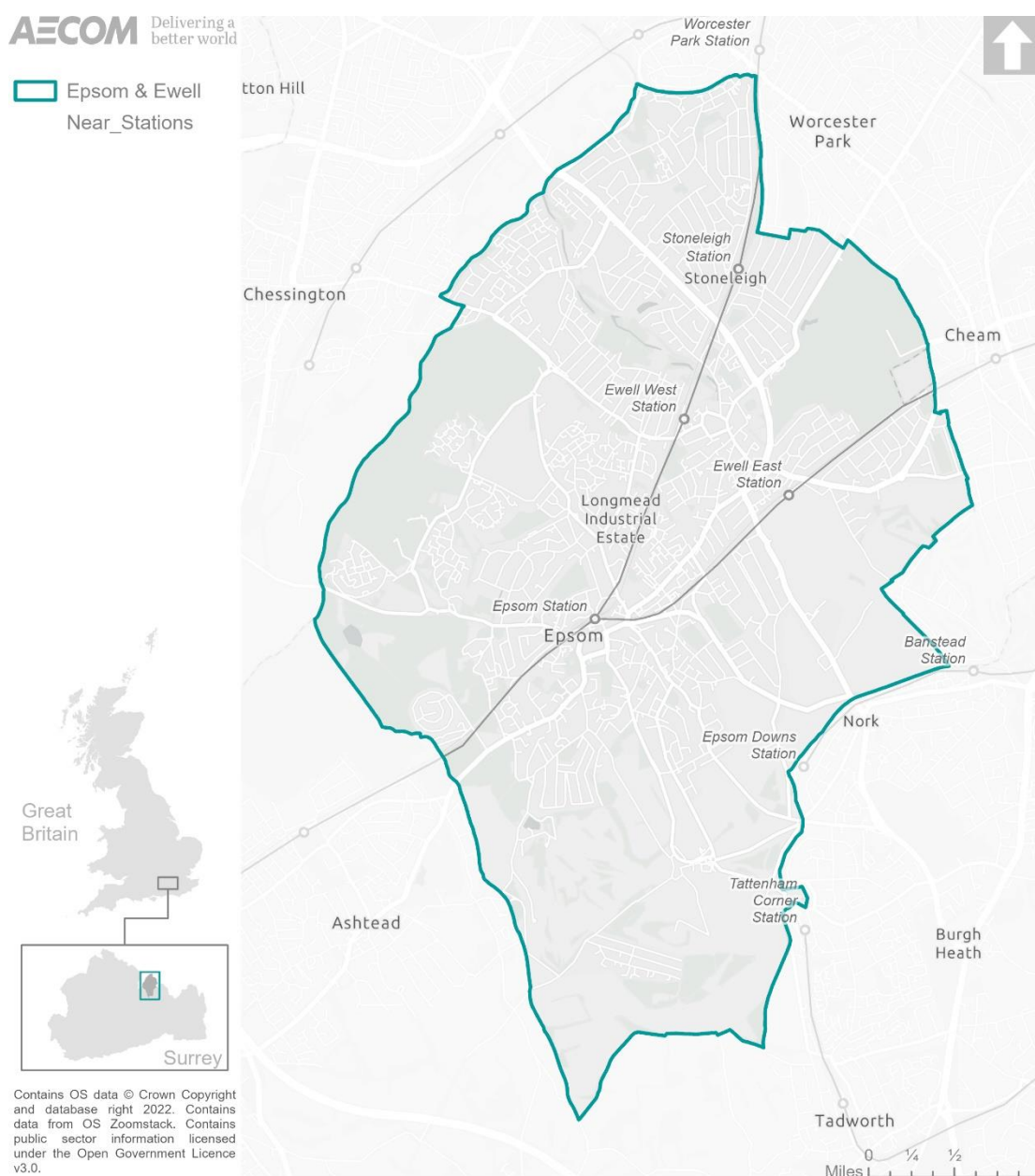
- Legislation, policy and guidance - for some time, the Government has been signalling its intention to make significant changes to the English planning system and, in May 2022, published its Levelling Up and Regeneration Bill, followed by draft revisions to the National Planning Policy Framework (NPPF) in December 2022. Whilst acknowledging that these changes may have significant implications for plan making in the future, the Government has reiterated the importance of maintaining progress to get up to date local plans in place. The new Local Plan is therefore based on the 2021 NPPF, the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 1990. The new Local Plan must also be prepared having regard to Government's Planning Practice Guidance (PPG). A primary consideration, central to the NPPF (para 11) is a requirement to maintain an up-to-date local plan that meets objectively assessed development needs, as far as is consistent with sustainable development.
- The Duty to Cooperate - the plan must be prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, there is a need for EEBC to work closely with neighbouring local planning authorities, Surrey County Council, the Greater London Authority (GLA), statutory advisory bodies (for example the Environment Agency, Natural England and Historic England), infrastructure providers and other organisations to ensure that the Local Plan is prepared mindful of cross-boundary issues and 'larger than local' strategic priorities, including in respect of housing need.
- Neighbourhood planning - the new Local Plan must naturally take account of 'made' and emerging neighbourhood plans; the Stoneleigh and Auriol Neighbourhood Forum neighbourhood plan is currently in preparation. Neighbourhood plans must be in general conformity with the local plan, but it is equally the case that neighbourhood plans inform the local plan preparation.

2.3 The plan area

- 2.3.1 Epsom and Ewell is a small local authority (borough council) within Surrey, covering an area of ~34 km². The borough has a population of ~80,900, according to data from the 2021 census, which represents a 7.7% increase from 75,100 residents in 2011. Although it is the smallest of the boroughs in Surrey in terms of both population and area, Epsom and Ewell is the most densely populated and fastest growing.
- 2.3.2 Epsom town centre is the primary centre of the borough, and the secondary centres are Ewell Village and Stoneleigh Broadway. There is also a large industrial area (Longmead and Kiln Lane Industrial Estates), numerous retail parades and a number of facilities located elsewhere, including sports / leisure facilities.
- 2.3.3 The borough is well served by rail, bus and active travel infrastructure, including high quality cycle routes. In terms of the road network, Epsom and Ewell is situated just within the M25 corridor, and the A24 is the primary radial road corridor, with the borough also intersecting the A240, A232 and A2022. Epsom and Ewell has the lowest number of cars per household of the Surrey authorities, at 1.4 cars per household.
- 2.3.4 Epsom and Ewell contains 321 listed buildings (including 17 grade II*), two scheduled monuments, one grade II listed park and garden, and 21 conservation areas (three of which are 'at risk' according to the 2021 Heritage at Risk Register for the South East, namely Epsom town centre, Ewell Village and Horton). EEBC has also designated over 70 buildings or structures which are of local historic significance.

- 2.3.5 Epsom and Ewell is located approximately 1.8 km north of the Surrey Hills Area of Outstanding Natural Beauty (AONB), and it is noted that a boundary [review](#) is currently underway, led by Natural England, with a view to extending the boundary of the AONB. The borough also falls entirely within the London Metropolitan Green Belt, such that the Green Belt is a key constraint to growth. The Green Belt broadly forms a horseshoe shape wrapping around the main urban areas in the centre and north of the borough.
- 2.3.6 Two nationally designated sites for biodiversity intersect with the borough, which are Epsom and Ashted Common Site of Special Scientific Interest (SSSI) and Stones Road Pond SSSI; and Banstead Downs SSSI is located ~800m to the east of the borough. There are also several locally designated Sites of Nature Conservation Importance (SNCIs), including quite extensive tracts of the Green Belt, as well as areas of non-designated priority habitat. Key priority habitats within the borough (within and outside of designated sites) include: deciduous woodland (including ancient woodland), lowland calcareous grassland, good quality semi-improved grassland, traditional orchard, and wood pasture and parkland. The distribution of key habitats relates closely to geology / topology and historic land uses.

Figure 2.1: The plan area



2.4 The plan period

- 2.4.1 The current Local Plan, which was adopted in 2007, covers the period up to 2022. The new Local Plan is likely to be adopted in 2024/25, and covers the period 1st April 2022 to 31st March 2040. This is mindful of paragraph 22 of the National Planning Policy Framework (NPPF), which states: *“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure...”*
- 2.4.2 It is also important to note paragraph 68 of the NPPF, which explains that, whilst the aim is to plan for a supply to meet needs in full for the entire plan period, there is a degree of flexibility. Specifically, paragraph 68 requires identification of *“specific, deliverable sites for years one to five of the plan period”* and *“specific, developable sites or broad locations for growth for years 6-10 and where possible, for years 11-15...”*

2.5 Plan objectives

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

3 The SA scope

3.1 Introduction

- 3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1).

- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA. Further information is presented in a stand-alone [Scoping Report](#) (2022); however, it is not possible to define the scope of the SA comprehensively. Rather, there is a need for the SA scope to be flexible and adaptable, responding to the nature of the emerging plan and reasonable alternatives, and the latest evidence-base.

3.2 Consultation on the scope

- 3.2.1 The Strategic Environmental Assessment (SEA) Regulations 2004 require that: “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies.*” In England, the consultation bodies are the Environment Agency, Historic England and Natural England.³ As such, these authorities were consulted on the SA scope in 2022. Subsequently the report was updated/finalised to reflect consultation responses received from Spelthorne Borough Council and the Environment Agency. Comments are welcomed on the SA scope at the current time.

3.3 The SA framework

- 3.3.1 The outcome of scoping work in 2022 was an SA ‘framework’ comprising 12 topics, each with one or more associated objectives. The aim of the SA framework is to ensure suitably focused and concise appraisal.
- 3.3.2 Subsequently, it was determined appropriate to add a new topic dealing with ‘Accessibility’ (to community infrastructure), which is invariably a key issue for local plan-making, both in terms of avoiding issues and realising growth-related opportunities.

Table 3.1: The SA framework

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

³ In-line with Article 6(3) of the SEA Directive, these bodies were selected because “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.*”

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

4 Introduction to Part 1

Overview

- 4.1.1 Plan-making has been underway since 2017, when there was an initial consultation on ‘issues and options’. The focus here, within Part 1, is not to relay the entire ‘backstory’ of the plan-making/SA process, or to provide a comprehensive audit trail of steps taken. Rather, the aim is to report work undertaken to examine **reasonable alternatives** ahead of the current consultation. Specifically, the aim is to:
- explain the reasons for selecting the alternatives dealt with - see **Section 5**
 - present an appraisal of the reasonable alternatives - see **Section 6**
 - explain the Council’s reasons for selecting the preferred option - see **Section 7**
- 4.1.2 Presenting this information is in accordance with the regulatory requirement to present an appraisal of ‘reasonable alternatives’ and ‘an outline of the reasons for selecting the alternatives dealt with’ within the SA Report (N.B. this is not the SA Report but aims to present the information required of the SA Report).

Reasonable alternatives in relation to what?

- 4.1.3 The legal requirement is to examine reasonable alternatives (RAs) taking account of “the objectives and geographical scope of the plan” (see Section 2). Following discussion of plan objectives with officers, it was determined appropriate to focus on the **spatial strategy**, i.e. providing for a supply of land, including by allocating sites (NPPF paragraph 68), to meet objectively assessed needs and wider plan objectives. Establishing a spatial strategy is clearly an overarching objective of the new Local Plan.⁴ As such, it is reasonable to focus on exploring alternatives so as to inform a decision on the preferred spatial strategy.
- 4.1.4 The decision was made to refer to the spatial strategy alternatives as “**growth scenarios**”.

What about site options?

- 4.1.5 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely the case, and is not the case for the Epsom and Ewell Local Plan. Rather, the objective is to allocate *a package* of sites to meet needs and wider objectives, hence RAs must be in the form of alternative *packages* of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing reasonable growth scenarios – see Sections 5.3 and 5.4.

Is the focus on housing sites?

- 4.1.6 Establishing a supply of land to meet housing needs is typically a matter of overriding importance for local plans, and the current local plan is no exception. However, local plans are also tasked with meeting wider development needs, including in respect of employment land and specialist accommodation.
- 4.1.7 The process set out in Section 5 is somewhat *housing-led*, but other needs are discussed as appropriate, including within Section 5.5, where conclusions are drawn on reasonable growth scenarios.

What about other aspects of the plan?

- 4.1.8 As well as establishing a spatial strategy, allocating sites etc, the local plan must also establish policy on thematic borough-wide issues, as well as site-specific policies, to guide decision-making at the planning application stage. Broadly speaking, these can be described as development management (DM) policies.
- 4.1.9 However, it is a challenge to establish DM policy alternatives that are genuinely reasonable.⁴ In this case, following discussions between EEBC officers and AECOM, no reasonable DM policy alternatives were identified; however, views on reasonable DM policy alternatives are welcomed at the current time.

⁴ It was also considered appropriate to focus on ‘spatial strategy’ given the potential to define “do something” alternatives that are meaningfully different, in that they will vary in respect of ‘significant effects’. The Government’s Planning Practice Guidance (PPG) is clear that SA “*should only focus on what is needed to assess the likely significant effects of the plan*”. It is also important to recall that “do nothing” is the baseline situation, and so arguably not a reasonable alternative to “do something”, recognising that the very aim of appraising any “do something” option is to appraise that option *against the baseline*. Arguments for “do nothing” not being a reasonable alternative are particularly clear where it is the case that the plan objective is to “do something”.

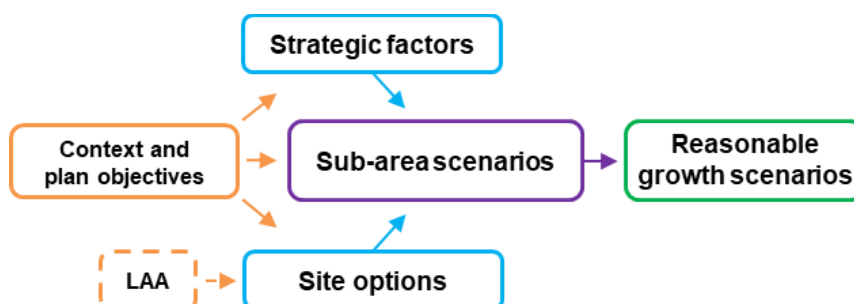
5 Defining growth scenarios

5.1 Introduction

5.1.1 The aim here is to discuss the process that led to the definition of reasonable growth scenarios.

N.B. to reiterate the discussion in Section 4, “growth scenarios” equate to “reasonable alternatives”.

Figure 5.1: Establishing reasonable growth scenarios



Structure of this section

5.1.2 This section of the report is structured as follows:

- **Section 5.2** – explores strategic issues and options with a bearing on growth scenarios.
- **Section 5.3** – considers individual site options, as a key input to growth scenarios.
- **Section 5.4** – explores growth scenarios for sub-areas / broad categories of potential supply.
- **Section 5.5** – draws upon the preceding 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 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 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)?
- Distribution – *broadly* where is more / less suited to growth and what types of growth are supported?

Quantum

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

Background

5.2.3 A central tenet of plan-making process is the need to **A)** establish housing needs; and then **B)** develop a policy response to those needs. The Planning Practice Guidance (PPG) explains:

*“Assessing housing need is **the first step** in the process of deciding how many homes need to be planned for. It should be undertaken separately from... establishing a housing requirement figure and preparing policies to address this such as site allocations.”*

- 5.2.4 With regards to (A), the NPPF (paragraph 61) is clear that establishment of **LHN** should be informed by an *“assessment conducted using the standard method... unless exceptional circumstances justify an alternative approach which also reflects... demographic trends and market signals”* [emphasis added].
- 5.2.5 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting the housing **requirement** at LHN and identifying a **supply** through policies sufficient to deliver this housing requirement (at a suitable rate/trajectory over time, which will invariably necessitate putting in place a ‘buffer’ to mitigate against the risk of unforeseen delivery issues). However, under certain circumstances it can be appropriate to set a housing requirement that *departs* from LHN.

Epsom and Ewell’s LHN

- 5.2.6 A three-step standard method for calculating LHN was first published by the Government/ in 2017, and then a fourth step was added in 2020.⁵ This fourth step, known as the ‘cities and urban centres uplift’, does not have a bearing on the calculation of Epsom and Ewell’s LHN.
- 5.2.7 There have also been some notable changes to guidance in respect of the data that should be utilised as an input to the standard method since the method was first introduced. Specifically, following a consultation in late 2018, the PPG was updated to require that the household growth projections used as an input to the method must be the 2014-based projections, rather than more recent projections. The PPG explains that the change was made in order to:⁶ *“provide stability... ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.”* Updates to the PPG in late 2020 confirmed this approach.
- 5.2.8 The standard method derived LHN for the borough is **576 dwellings per annum** (dpa), or 10,386 homes in total over the plan period.⁷ This figure increased in 2022, following release of the annual local authority ‘affordability ratios’ by the Office for National Statistics (ONS), which influences step 2 of the standard method. The latest statistical release found that the ratio of median house price to workplace-based earnings worsened from 17.17 to 17.98, which is very high in the context of Surrey and the South East.

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

- 5.2.9 In addition to paragraph 60 of the NPPF, local plan-makers must consider paragraph 010 of the PPG on Housing and Economic Needs Assessment, which sets out reasons for exploring ‘above LHN’ options. These relate to providing for unmet needs from elsewhere and/or realising particular growth-related opportunities, e.g. in terms of supporting economic growth (whilst avoiding high levels of commuting).
- 5.2.10 However, in the Epsom and Ewell context the reality is that there is no potential to set the local plan housing requirement at a figure above LHN, given the constraints to growth that exist. These matters are a focus of discussion in Section 5.4; however, broadly speaking: all undeveloped land outside of the main urban area is designated as Green Belt, and the great majority (if not more-or-less all) quite clearly contributes strongly to the established purposes of the Green Belt; and the urban area is mostly associated with a low to medium density character, such that it is not well suited to high density development.
- 5.2.11 It is also fair to note the following *proposed* (i.e. draft) additions to the NPPF through the Government’s [consultation](#) on *“Levelling-up and Regeneration Bill: reforms to national planning policy”* (December 2022):
- “Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period.”
 - [Instances where the housing requirement need not be set at LHN] “may include situations where meeting need in full would mean building at densities significantly out of character with the existing area.”

⁵ GOV.UK (2015): ‘Housing and economic needs assessment’, [online] available to access via [this link](#)

⁶ Ibid.

⁷ This is a ‘capped’ figure, meaning that step 3 of the standard method (“Capping the level of any increase”) does apply. The uncapped housing need figure is higher, as discussed within the HEDNA (2022).

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

- 5.2.12 As currently drafted (without considering the current proposed changes), Paragraph 11 of the NPPF states: “... *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*” [emphasis added]
- 5.2.13 Epsom and Ewell is heavily constrained by NPPF “*policies... that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area*”. In particular, the borough falls within the London Metropolitan Green Belt. Also, national biodiversity and historic environment designations are a constraint to growth in some parts of the borough.
- 5.2.14 As such, there is a strong strategic argument for exploring growth scenarios that would involve setting the housing requirement at a figure below LHN and, in turn, generating unmet housing needs that must then be met by one or more neighbouring or nearby local authorities.
- 5.2.15 However, on the other hand, there is a strong argument for ruling out “very low growth”. This reflects:
- the extent of housing need locally, including need for affordable housing, which is extremely high;
 - an understanding that meeting housing need is important not only in and of itself, but also due to highly significant secondary benefits, for example in terms of supporting communities and the local economy;
 - the fact that Epsom and Ewell sits within a sub-region where unmet housing need is already a very significant issue, with the reality being that there is little or no confidence regarding where, when or even if unmet housing need generated by the Epsom and Ewell Local Plan will be provided for.
- 5.2.16 These matters are explored further below.

Conclusion on housing quanta options

- 5.2.17 In light of the discussion above, attention focuses on reasonable growth scenarios involving providing for below LHN *but not too far below* (i.e. the aim should be to ‘close the gap’ to LHN as far as possible). However, at this stage in the process (of defining reasonable growth scenarios), it is not possible to categorically rule-out setting the housing requirement at LHN as ‘unreasonable’.
- 5.2.18 The question of precise quanta figures to reflect across the growth scenarios is returned to within Section 5.5, subsequent to consideration of broad distribution, site options and sub-area scenarios.⁸

Broad distribution

Introduction

- 5.2.19 This is the second of two sections examining ‘strategic factors’. The aim here is to present a brief overview of key broad spatial considerations with a bearing on the development of reasonable growth scenarios.

The urban area

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

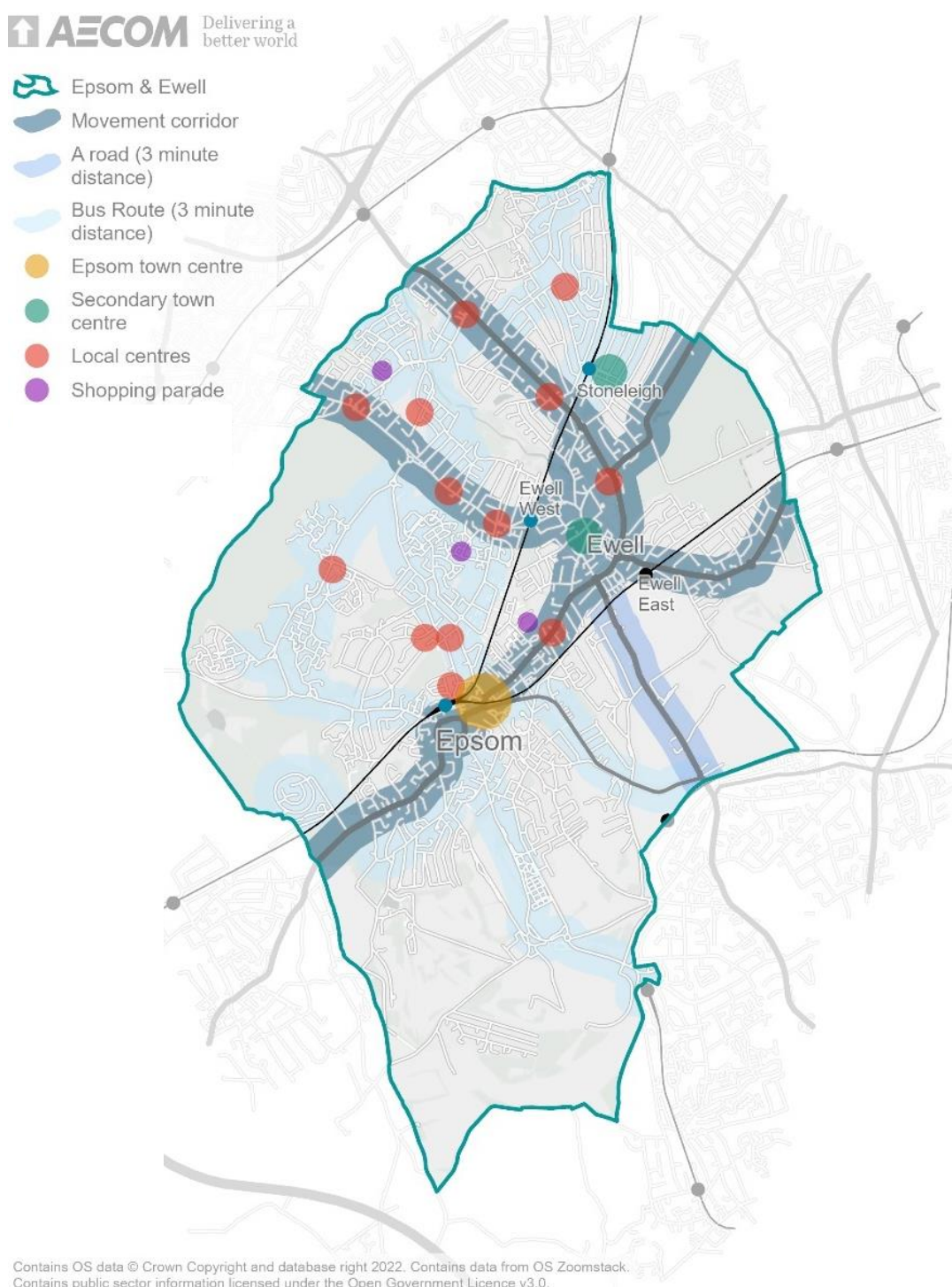
⁸ It is important to reiterate that there is invariably a need to provide for a supply buffer over-and-above the housing requirement. This is to ensure that the requirement is met in practice over the plan period, i.e. there is a robust supply ‘trajectory’, recognising that unforeseen delivery issues can and will occur at the development management (planning application) stage. A “robust supply trajectory” involves a situation whereby a five year housing land supply (5YHLS), as measured against the housing requirement, can be maintained throughout the entire plan period, and the Housing Delivery Test (HDT) can be met when applied on a yearly basis across the plan period. The ideal situation involves a steady housing trajectory. However, under the Government’s PPG, there is flexibility to set a ‘stepped’ housing requirement / trajectory, where there is evidence to demonstrate that this is necessary. A stepped requirement / trajectory is one whereby the requirement is set at a level below the annualised total plan period housing requirement in the early years of the plan, and then compensated for in the latter years of the plan.

5.2.21 Focusing on **transport connectivity**, there is an important distinction between:

- more accessible and/or well-connected areas, which means areas that are well-linked to Epsom town centre, one of the two local centres (Ewell and Stoneleigh), a train station and/or one of the primary road corridors, along which there are higher frequency bus services and concentrations of retail parades; and
- the wider urban area, where accessibility and 'sustainable transport' connectivity can be considerably lower and, in turn, car dependency can be considerably higher.

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

Figure 5.2: Centres, transport hubs and key corridors across the borough



5.2.23 There are two further headline points to note regarding the main urban area:

- Within the **town centre**, work is ongoing in respect of detailed masterplanning, following a consultation held in summer 2022. There are wide-ranging opportunities, and the overarching objective is to enhance the vitality and viability by supporting “diversification, and enhancement of the cultural offer and public realm”. The following vision statements have also been prepared:

“Epsom Town Centre will have remained the principal urban centre in the borough and new development will have reflected and enhanced its urban qualities, with a rich collection of uses, compact neighbourhoods and safe streets. There will be more people living in the centre helping to support it as a prosperous market town, and support the existing shops, leisure cultural uses, public transport services and community facilities that are so valued by existing residents.

... The town centre will attract the best students and academic staff with modern facilities housing the University of Creative Arts and the Laine Theatre Arts School, who in turn contribute to the local economy. Graduates will have access to affordable space within the town centre to make and sell their creations, making Epsom town centre even more distinctive from other nearby centres.”

There are four key opportunity sites / site clusters, and at each there are key choices to be made, including in respect of development density (including, but not limited to, questions around building heights). At each of the four sites there is clear potential to deliver a net increase of more than 25 homes, such that all four undoubtedly warrant a formal allocation within the Local Plan.⁹ However, there are also constraints to growth, perhaps most notably in respect of character and the historic environment.

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

In light of all the evidence, the current view is that there is no reasonable growth scenario involving housing supply from the industrial estates (within the plan period). It is recognised that the industrial estates benefit from very good proximity to Epsom town centre (to the south; also Ewell West Station to the north), and that the effect of delivering new housing here would be to reduce pressure on the Green Belt, but there is a clear need to avoid impacting on the economic functioning of the industrial estates, and there are practical challenges to effective mixed use redevelopment / intensification. It could be that further work serves to identify deliverable or developable housing supply (see NPPF paragraph 68), but no such supply can be identified at the current time, such that any reliance placed on supply from the industrial estates would risk ‘setting the plan up to fail’. Specifically, there would be a risk of housing supply in practice dropping below the housing requirement, leading to a risk of punitive measures.¹⁰

5.2.24 Outside of the main urban area there is one other location ‘inset’ from the Green Belt, namely the village of **Langleigh Vale**, but there is no significant development opportunity within the confines of the village (the option of village expansion is discussed further below).

The Green Belt

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

⁹ The intention is for sites delivering a net increased of fewer than 25 homes to be simply listed within the Local Plan, with further information presented within the separate Land Availability Assessment, LAA.

¹⁰ i.e. the ‘presumption in favour of sustainable development’ (NPPF paragraph 11), which can also be thought of as a ‘tilted balance’ in favour of housing delivery. This was a factor at a notable recent planning appeal in respect of a 20 home scheme in the Green Belt, which was refused by the Council (ref. [20/00475/FUL](#)), but then allowed by a Planning Inspector at appeal (ref. [APP/P3610/W/21/3280881](#)). The borough’s housing supply position, as measured against the committed target/requirement, is discussed at paragraphs 29 and 33. For example, the Inspector explains: “For the above reasons, and also in the context of the LPAs housing land supply and delivery position, I do not find that the site would be unsustainably located.”

- 5.2.26 All five sites remain within (or “washed over by”) the Green Belt; however, the possibility of “insetting” developed land that does not contribute to the open character of the Green Belt will be considered prior to plan finalisation. Insetting could feasibly enable a degree of infilling development, but this is not likely to be significant. What is more significant is two sites within West Park (one within the conservation area and one adjacent) that remain in use as NHS buildings but are underused and surplus to requirements. These two sites are available for development and are discussed further below.
- 5.2.27 The final broad area for consideration is the **remainder of the Green Belt**. The [Green Belt Study](#) (2017) identified 50 parcels in total; however, five of these are associated with the aforementioned hospital cluster, and numerous others are associated with land that does not come into contention for housing growth under any reasonably foreseeable scenarios, including Epsom Common, Epsom Downs, Horton Country Park and several large areas of land designated as a Site of Importance for Nature Conservation (SNCI). The parcels that might realistically come into consideration for growth (depending on the availability of land, as discussed below) are associated with three broad areas:
- West of Epsom – as far as Horton Country Park, including the hospital cluster.
 - South / southeast of Epsom – moving from west to east, this sector includes: an area of land associated with the edge of Ashted (in neighbouring Mole Valley District); RAC Golf and Country Club; Epsom College and associated land; and remaining land between the urban edge and Epsom Downs.
 - East of Epsom – primarily comprises the gap between the main urban area and Banstead (in Reigate and Banstead Borough) although the north of the sector comprises the gap to London Borough of Sutton.
- 5.2.28 Finally, with regards to the Green Belt, there is a need to note the potential to bring forward strategic growth locations which, in practice for Epsom and Ewell, means **strategic urban extensions** (as there is no land feasibly in contention to deliver a new settlement). Strategic sites are those with a housing capacity in the several hundreds or thousands, leading to economies of scale that enable delivery of new or upgraded strategic infrastructure alongside housing and a strategic approach to masterplanning and design, for example ensuring a good mix of uses onsite (also a good mix of homes in terms of type, size and tenure). The NPPF is supportive of strategic growth locations, explaining (paragraph 73):
- “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:*
- a) consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains;*
 - b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*
 - c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes...;*
 - d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites...”*
- 5.2.29 The Government’s Garden Communities [Prospectus](#) (2018) suggested a minimum size of 1,500 homes.

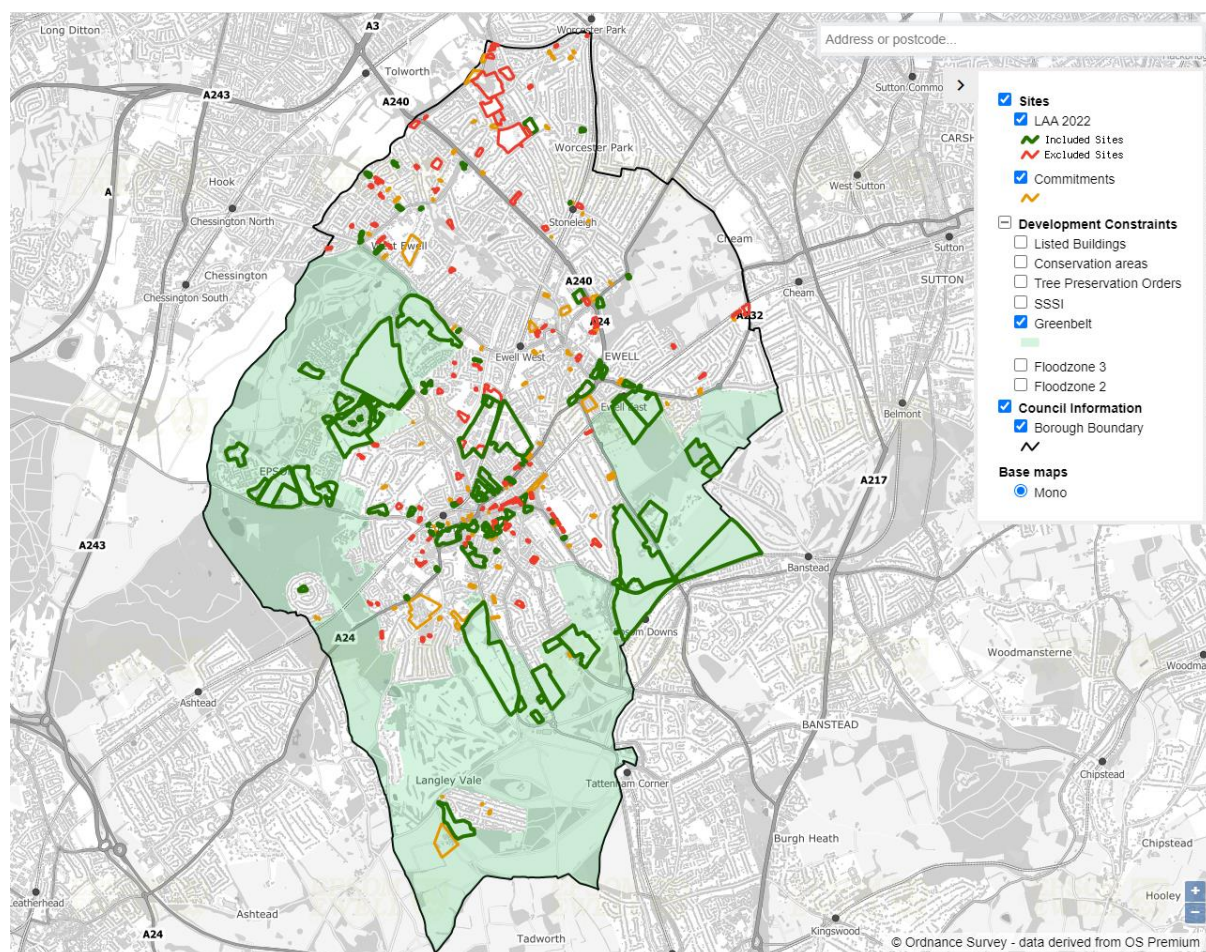
Conclusions on broad distribution

- There are growth related opportunities in the **main urban area**, most notably within the town centre and those better connected / most accessible parts of the wider urban area, and the effect of growth here will be to minimise pressure on the Green Belt; however, there are also constraints to growth, particularly in respect of character and the historic environment. There is no potential to assume any significant housing supply from the industrial estates, but this matter must naturally be kept under review.
- The Epsom and Ewell **Green Belt** is clearly highly sensitive, but limited release could not only make a major contribution to meeting housing need, which is an objective of great importance, but could also serve to realise local growth-related opportunities. Three broad sectors of the Green Belt feasibly come into contention as locations for growth, subject to land availability, as discussed below.

5.3 Site options

- 5.3.1 The EEBC-led Land Availability Assessment (LAA, 2022) is the starting point for considering the merits of individual site options. An interactive LAA is available [here](#). The LAA includes all sites submitted up until 5th August 2022, including through a [call for sites](#).
- 5.3.2 A total of 194 sites are considered in the LAA. From these, 63 urban sites are “included”, in that they are considered deliverable (likely to come forward in the first five years of the plan) or developable (likely to come forward in the latter part of the plan period). The great majority of excluded sites are excluded on the basis of being too small for inclusion in the plan, which is apparent from Figure 5.3.
- 5.3.3 Those included urban sites that are deliverable or developable for housing can be taken forward into the plan. The intention is for sites with a capacity of 25 homes to be formally allocated, whilst smaller sites will simply be listed in the plan (currently Appendix II); however, at the current time, several sites with an assumed capacity over 25 are only listed in the plan, ahead of availability (in the majority of cases), achievability or suitability being confirmed.
- N.B. several “included” sites within the urban area are deliverable or developable for uses other than housing and so, whilst they are shown in Figure 5.3, they are not listed in Appendix II of the current plan document. This is most notably the case for Longmead and Kiln Lane Industrial Estates (discussed above) and the University of Creative Arts Campus.
- 5.3.4 The great majority of identified housing capacity in the urban area is within Epsom town (1,526 homes, 69.4%), followed by sites within Ewell (207 homes, or 9.4%).
- 5.3.5 With regards to Green Belt sites, these are shown as “included” in Figure 5.3, but there can be no automatic assumption that they are appropriate for including / allocation within the plan. All Green Belt site options are discussed further in Section 5.4.

Figure 5.3: A screenshot from the interactive LAA, which is available [here](#)



5.4 Sub-area scenarios

Introduction

- 5.4.1 Discussion has so far focused on A) ‘top down’ considerations of housing quantum and broad distribution issues and options; and B) ‘bottom-up’ consideration of site options. The next step is to consider each of the borough’s sub-areas in turn, exploring how sites might be allocated/ supported in combination.

What sub-areas?

- 5.4.2 Consideration is given to the following sub-areas in turn (which might alternatively be thought of simply as different sources of potential housing supply):

- Epsom town centre
- The wider urban area
- The industrial estates
- Previously developed land (PDL) within the Green Belt
- Green Belt

Methodology

- 5.4.3 The aim is to conclude on reasonable scenarios that need to be taken forward to Section 5.5 of the report, where sub-area scenarios are combined in order to arrive at reasonable growth scenarios. The aim is *not* to present a formal appraisal of reasonable alternatives.
- 5.4.4 Accordingly, the discussions are systematic only up to a point, with extensive application of discretion and planning judgment applied. The aim is not to discuss all conceivable options to precisely the same level of detail, but rather to focus attention on those site options *judged* to be a more marginal, i.e. where the question of whether or not to take the option forward is more finely balance. This approach is taken mindful of the legal requirement, which is to explain reasons for arriving at reasonable alternatives in “outline” terms. Views on the approach taken and the outcomes of the work are welcomed.

Epsom town

- 5.4.5 As discussed, the great majority of housing capacity identified through the LAA is within Epsom town, including the town centre. There is little to be gained by questioning the conclusions of the LAA in terms of whether urban sites are deliverable or developable; however, there are important questions in respect of how sites are redeveloped. In particular, there are important questions in respect of development density, to include consideration of building heights. Another important question is in respect of re-using buildings, as far as possible (i.e. minimising the need for demolition), with a view to minimising embodied (or ‘non-operational’) greenhouse gas emissions associated with growth within the borough. A related question is in respect of potentially retaining the facades of buildings, for heritage reasons.
- 5.4.6 The LAA identifies 26 included sites that are deliverable or developed for housing, of which eleven make up the four key opportunity areas that are a focus of ongoing town centre masterplanning, namely: Hook Road Car Park and SGN Site; Town Hall, Hope Lodge and Epsom Clinic; Depot Road and Upper High Street – LAA site; and Ashley Centre. Each of these opportunity areas is associated with a range of important issues and options. However, for the purposes of defining growth scenarios, it is judged reasonable to explore a choice between alternative approaches to **density**.
- 5.4.7 Specifically, for all 26 sites, there is judged to be a choice between: A) the emerging preferred approach, which reflects a boost to typical standard densities locally, reflecting the extent of housing needs, wider opportunities associated with town centre growth and the need to minimise pressure on the Green Belt; and B) a lower density approach, specifically 20% lower, judged to be more in line with typical densities.
- 5.4.8 This leads to **two reasonable growth scenarios** for further consideration in Section 5.5: A) ~860 homes in total; or B) ~1,070 homes via higher densities.

The wider urban area

- 5.4.9 As per Epsom town, the key choice to explore further is judged to be in respect of development density. There is the possibility of drawing a distinction between two categories of site option within the wider urban area according to the level of accessibility / connectivity (see discussion in Section 5.2); however, on balance, it is considered reasonable to treat all sites in the same way.
- 5.4.10 Specifically, there is judged to be a choice between: A) the emerging preferred approach, which reflects a boost to typical standard densities locally (as per the town centre); and B) a lower density approach, specifically 20% lower, judged to be more in line with typical densities locally.
- 5.4.11 This leads to **two reasonable growth scenarios** for further consideration in Section 5.5: A) ~830 homes in total; or B) ~1,040 homes via higher densities.

The industrial estates

- 5.4.12 As discussed in Section 5.2, there is no reasonable scenario involving significant housing growth in the plan period, such that there is **one reasonable growth scenario**, involving nil homes.

Previously developed land within the Green Belt

- 5.4.13 There is only one available site, which is Land at West Park Hospital, to the west of Epsom. West Park was one of the three hospital cluster sites allocated within the Epsom and Ewell Core Strategy (2007), and redevelopment has mostly come forward as planned. The current proposal is to deliver 150 homes on two parts of the site that still comprise NHS buildings, which are underused and judged by the NHS to be surplus to needs. The effect will be to reduce pressure on greenfield land within the Green Belt, plus it is important to note all developed land in this area (i.e. the former hospital site as a whole, also other nearby former hospital sites) may be removed ('inset') from the Green Belt prior to plan finalisation (subject to further investigation). There is not considered to be a significant choice in respect of development density (mindful of heritage constraint, including conservation area designation), and so the overall conclusion is that there is only **one reasonable growth scenario** for 'PDL in the Green Belt' (150 homes).

Green Belt

- 5.4.14 Green Belt can only be released for development through local plans in exceptional circumstances, and the importance of protecting the Green Belt is emphasised by the Government through the current [consultation](#) on *Levelling-up and Regeneration Bill: reforms to national planning policy*. However, there are reasons to suggest that exceptional circumstances may exist in this case. A primary consideration is Local Housing Need (LHN), which is 576 dwellings per annum (dpa). Also, affordable housing needs are extremely high, with the Housing and Economic Development Needs Assessment (HEDNA, 2022) identifying a need for 652 affordable homes per annum. The true figure may be lower (see discussion in Section 13 of the HEDNA), but any figure for affordable housing need must be considered in the context of extremely low supply, with just 12 affordable homes delivered over the last two [monitoring](#) years).
- 5.4.15 When viewed in the context of supply from non-Green Belt sources totalling *at most* 206 dpa,¹¹ high housing needs serves as a reason to at the very least explore the possibility of exceptional circumstances. As part of this, it is important to recall that the effects of not meeting housing needs are wide-ranging (e.g. relating to commuting / road traffic, business decision-making, investment, productivity, inequality, health and meeting the needs of specific sectors of the population, including families and older people). Also, housing growth can bring benefits to local communities ('planning gain') including by delivering or facilitating delivery of new and upgraded infrastructure. A report on *"The Case for Housebuilding"*, published in January 2022, notably [concluded](#):

"The fundamental case for housebuilding is that without it, Britain will become a less productive, less equal, less fair and less happy country. If we want to rebuild our economy after the pandemic, and create a better society, we need to get building."

¹¹ Calculated as: A) town centre and wider urban area allocations (with the higher density scenario assumed); plus B) Green Belt PDL; plus C) commitments (new homes with a planning permission as of 31st March 2022); plus D) supply from windfall sites (i.e. sites that can be anticipated to come forward despite not being identified in the LAA). See further discussion below.

5.4.16 In this light, the question of Green Belt release is a key issue for the local plan. There is the question of whether to release any Green Belt at all, which is given considerable emphasis within the NPPF.¹² Also, if the decision is taken to release Green Belt (in light of demonstrable exceptional circumstances), then there is a clear need to take steps to minimise harm to the functioning of the Green Belt as far as possible, mindful of the five purposes of the Green Belt set out at [paragraph 138](#) of the NPPF.

5.4.17 The LAA does not differentiate between the available Green Belt site options, in terms of their suitability for release for development. However, on the basis of the analysis set out below, it is possible to identify a tentative sequential order of preference (N.B. this is a key step and, as such, views are sought through the current consultation, and further work will be undertaken to inform plan finalisation):

1. **Hook Road Arena** (~150 homes) – is Council-owned land and located close (~800m) to Ewell West Station. Also, the part of the site proposed for housing (with the remainder of the site proposed for a new sports hub) is very well contained within the landscape, with only a small proportion of the site perimeter open to the wider countryside, and this part of the perimeter comprises a mature field boundary (albeit also sensitive, as a historic field boundary associated with a blanket TPO).
2. **Horton Farm and Chantilly Way** (1,525 homes) – two adjacent sites for ~1,500 homes (Horton Farm) and ~25 homes (Chantilly Way). The combined site performs reasonably well in transport terms, including in terms of links to Epsom town centre (<2km), and there is limited environmental constraint to growth in this area (two nearby components of the Hospital Cluster Conservation Area are amongst the primary considerations). However, it is the scale of growth that serves as perhaps a primary argument in support of allocation. Urban expansion at this scale can give rise to wide-ranging opportunities over-and-above 'piecemeal' expansion (as discussed in Section 5.2) and, in this case, there is the potential to realise opportunities including around housing mix (size, type, tenure), green infrastructure and meeting Gypsy and Traveller accommodation needs.

N.B. Hook Road Arena is in close proximity, such that there is an argument for considering all three sites in combination (with a view to comprehensive development so as to fully realise opportunities). However, intervening land includes a conservation area, a cemetery and a horse-riding centre for people with disabilities (Epsom RDA). As such, two separate sites are assumed.

3. **Land adjoining Ewell East Station** (~350 homes) – there are some notable constraints here, including relating to existing use for sports pitches and sensitivities to the south; however, a key argument in favour of allocation relates to the proximity of Ewell East Station, which is adjacent. Also, there is the potential to deliver new local retail provision, which is understood to be needed in the local area. With regards to the sports pitches, there would be the potential to reprovide these at Hook Road Arena (discussed above).
4. **Downs Farm** (~650 homes) – performs similarly to the sites discussed above in terms of transport connectivity, with Epsom town centre comfortably under 2km distance, Epsom Downs Station under 1km walking distance (albeit the service is not as frequent as from Epsom (in particular) and Ewell East) and good access to the strategic road network. However, the land is subject to a higher degree of constraint in some respects, including as there is a concern regarding loss of the Green Belt gap between Epsom and Bansted (in contrast, Hook Road Arena and Land adj. Ewell East Station give rise to fewer concerns, from a Green Belt perspective, whilst Horton Farm potentially gives rise to fewer concerns once account is taken of Horton Park Local Nature Reserve, which is adjacent to the west). Different scales of growth can be envisaged, seeking to balance: A) a need to minimise impacts; with B) a desire to achieve comprehensive growth, with associated benefits, e.g. in terms of new and upgraded infrastructure. On balance, a ~650 home scheme is assumed, which is in line with the latest proposal from the site promotor.
5. **South East of Epsom** (550 homes) – a cluster of four LAA sites that, it is assumed (for the purposes of defining reasonable growth scenarios), would be delivered in combination, with a view to comprehensive growth. Epsom town centre is <2km distant, and Epsom Downs station ~1.5km walking distance from the eastern-most site, plus there is off-road cycle connectivity a good part of the way towards the town centre; however, the cluster is located between strategic road corridors (potentially with implications for bus connectivity). Landscape is a key constraint, with the land rising quite steeply towards Epsom Downs.

¹² Within the draft revised NPPF (December 2022), the primary change in respect of Green Belt policy is addition of the following statement within [Section 13](#): "Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period."

6. **South of Manor Park** (430 homes) – a cluster of four LAA sites that it is assumed (as above) would be delivered in combination, again with a view to comprehensive, well-planned growth. The cluster benefits from good proximity to Epsom town centre (<1.5km) and, in turn, Epsom station, and there could be a degree of landscape capacity, given a flat topography and extensive tree cover, which presumably could assist with screening sensitive views of development. However, environmental constraint is overall high (at least in comparison to the sites discussed above). Epsom Common SSSI is adjacent, the Thames Downs Link long distance path passes through this area (linking Epsom Common to Horton Country Park) and there is a high density of mature field boundaries / tree belts (mostly with an area Tree Preservation Order designation). Also, and importantly, the land in question clearly relates closely to two components of the Epsom Hospitals Cluster Conservation Area (specifically West Park and the Manor), as well as the separation between the Hospitals Cluster and Epsom. The land was proposed as an extension to the conservation area by an [appraisal](#) completed in 2007, and this was subsequently implemented, although the extension is not shown on all mapping, and it is noted that the proposed extension related to the setting of a house - Hollywood Lodge - that was extensively fire damaged in 2015, and now appears to be in a state of ruin. Regardless, the land in question clearly has high historic environment value. Finally, it should be noted that the firm intention, under any scenario, would be to retain the allotments currently within the site.

7. **Drift Bridge Farm** (600 homes), **NE of Reigate Rd** (170 homes) and **Langley Bottom Farm** (130 homes) are three further sites that are judged to perform relatively poorly, in comparison to those discussed above.

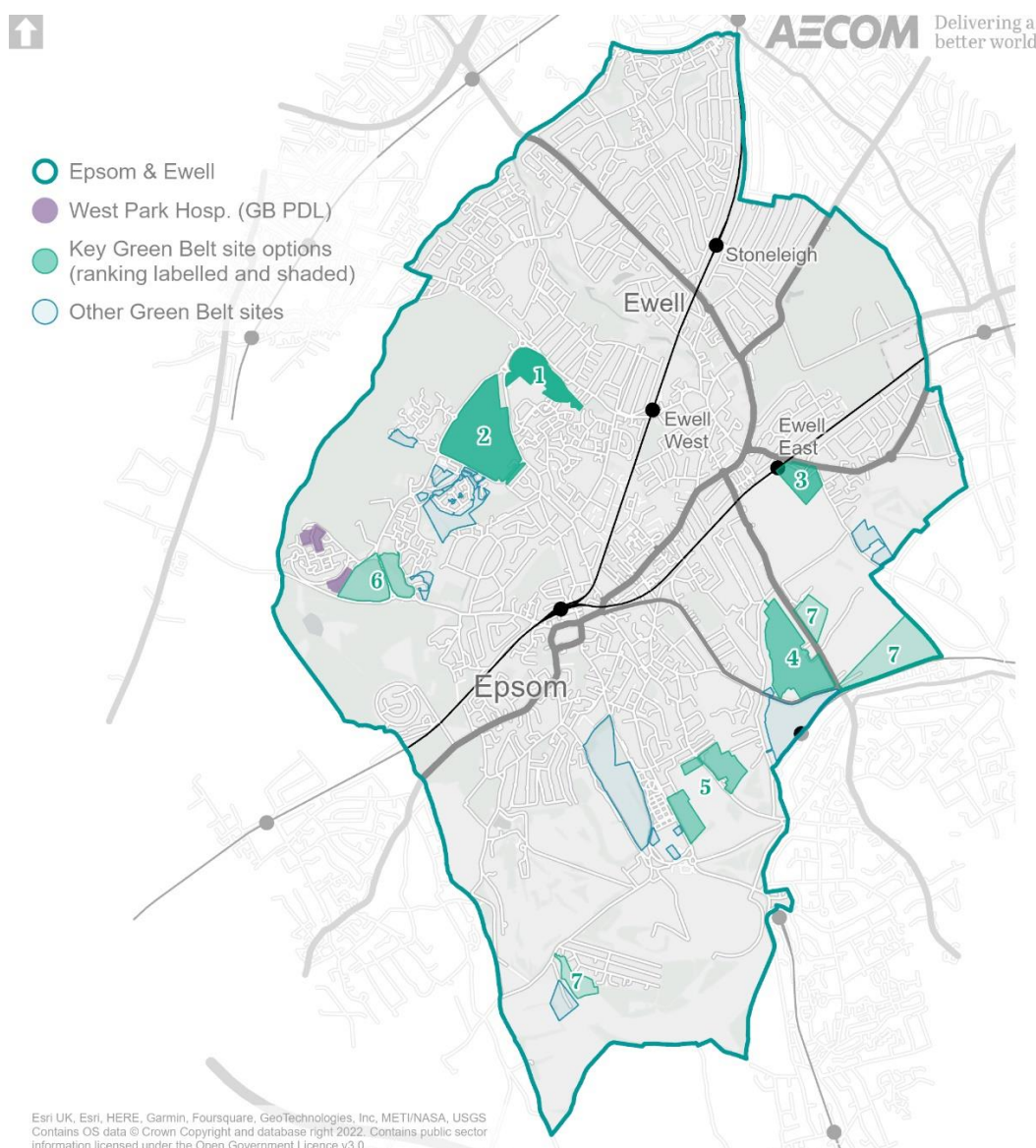
- a. Drift Bridge Farm may have a degree of capacity in landscape terms, given existing built form on two sides, and is subject to limited environmental constraint in some respects. However, the extensive northern boundary is open to the wider countryside (the gap between Epsom and Banstead), and the field boundaries that might be drawn upon to contain development appear relatively weak, such that there would be a concern regarding problematic development 'creep' downhill towards Epsom over time. Banstead station is nearby 'as the crow flies' but is >2km distant by current walking routes (assuming new access cannot be achieved, which would be challenging and potentially problematic). The existing road access, at the western extent of the site, is also potentially problematic, given proximity of the A240/A2022 junction and a railway bridge. The site relates more closely to Banstead than Epsom.
- b. Land North East of Reigate Rd (A420) comprises a light industrial area, a plant nursery and a composting facility, such that there is considerable existing built form. However, releasing land from the Green Belt would risk greatly compromising the integrity of the gap between Epsom and Banstead, including given limited potential to define a new defensible Green Belt boundary (i.e. the potential for further development creep over time can be envisaged). A development of 15 homes adjacent to the north of the site was delivered in 2015, but this was to enable [Priest Hill Nature Reserve](#) (which does assist with providing some containment within the landscape; also, there is a significant surface water flood channel between the site and North Looe Estate). Further considerations include: the value of existing uses onsite; the lack of bus services along the A240 (this is also an issue for Drift Bridge Farm and Downs Farm); and pedestrian / cycle connectivity and road safety along the A420 (it is noted that an offroad cycle route begins ~700m to the north, which might feasibly be extended).

Langley Bottom Farm is adjacent to the south of Langley Vale, which is a small village developed as a new settlement in the early 20th Century. The village lacks a centre, and overall has limited facilities, but there is a primary school, a good-sized village hall and some limited retail provision at a petrol station (a small shop / news agent recently closed). There is also excellent access to high quality countryside, including [Langley Vale Centenary Wood](#). The site in question comprises a single field to the south of the village, and is the only feasible location for a significant extension to the village, with a view to delivering new community infrastructure and supporting wider place-making. Also, the possibility of a new defensible Green Belt boundary can be envisaged, given woodland to the east and Ebbisham Lane to the south, which marks the northern extent of the Centenary Wood, and where there is a cluster of farm buildings with planning permission for a 20 home redevelopment (ref. [20/00475/FUL](#)). However, the site is clearly constrained in landscape terms, as it comprises the northern extent of the Area of Great Landscape Value (AGLV) designation within the borough, which is a Surrey-wide designation that essentially comprises an extension of the Surrey Hills AONB (and it is noted that a [review](#) of the AONB is currently underway, with a view to possible extension to include AGLV land). The land rises steeply from the south (from Ebbisham Lane towards the village) and is prominent within the landscape, including as

viewed from two adjacent bridleways (one being Ebbisham Lane) and from Langley Vale Road (at least glimpsed views). The site is also adjacent to Epsom Downs Site of Nature Conservation Importance (SNCI, i.e. the primary local level biodiversity designation). Importantly, aside from environmental constraints, Langley Vale has poor transport connectivity, in comparison to other locations under consideration that are closer to Epsom town centre and/or a rail station. There is only a limited bus service direct from Langley Vale to Epsom.

8. **Other Green Belt sites** – are available or, at least, were promoted as being available through the call for sites in 2022. However, all are judged to perform relatively poorly, at least in relative terms, i.e. in comparison to the sites discussed above. For example, land is available to the south of the town centre / east of Ashley Road / west of Chalk Lane, but this is steeply rising land with links to the racecourse, and there is a blanket TPO in place. Also, land is available between two of the components of the former hospitals cluster (the Manor and Horton), but this land is mostly designated as an SNCI (Livingstone Park). Finally, it should be noted that Council officers and AECOM discussed the possibility of exploring the potential to allocate parcels of land over-and-above those that have been promoted as available, which would necessitate proactive work to engage with land-owners etc. However, no significant opportunities were identified. One parcel of land that is not subject to headline constraints is at the southwest extent of the borough, adjacent to Ashted, but land here is seemingly in use as a stud farm and is poorly connected in transport terms, particularly as direct access to the A24 is blocked by an area of wooded common land. The possibility of modest housing growth with access from the west might be envisaged, but there is a significant surface water flood channel along the western boundary of this land parcel (the headwaters of the Rye) plus the adjacent common land.

Figure 5.4: Green Belt site options ranked in order of preference (see preceding discussion)



5.5 Reasonable growth scenarios

- 5.5.1 The final step was to **combine sub-area scenarios** into reasonable growth scenarios for the borough as a whole. Five sub-areas are discussed above, and in summary:
- For two sub-areas (Green Belt PDL and the industrial estates) there is only one reasonable scenario.
 - For two sub-areas (town centre and wider urban area) there are two reasonable growth scenarios.
 - For one sub-area (Green Belt) there are many feasible combinations of sites, but the identified sequential order of preference assists with keeping the number of combinations / scenarios to a reasonable number.
- 5.5.2 At this point in the process, there is a need to recall the key strategic **context**, namely local housing need (LHN) of 576 dwellings per annum (dpa) and supply from commitments and windfall (defined above) totalling 1,600 homes, or 89 dpa. Also, as discussed, for the purposes of defining reasonable growth scenarios it is fair to assume 150 homes supply from Green Belt PDL (also nil homes from the industrial estates) under all growth scenarios. As such, the total supply that can be assumed as a 'constant' across all reasonable growth scenarios is 97 dpa.¹³
- 5.5.3 As such, the **residual figure** to be met through allocations within the town centre, wider urban area and the Green Belt is *at least* 479 dpa *if* the housing requirement is to be set at LHN. N.B. this is an 'at least' figure because there is also a need to ensure that supply exceeds the housing requirement, as a 'buffer' to account for inevitable unforeseen delivery issues at the development management stage.
- 5.5.4 The **starting point** is a borough-wide growth scenario involving lowest growth across all three of the variable sub-areas, i.e. the lower density assumptions for both the town centre and wider urban area and nil greenfield Green Belt development. Total supply would be 3,442, or 191 dpa (and the housing requirement might be set at a figure 5 or 10% lower, to ensure a supply buffer). The effect would be the export of perhaps ~7,000 homes unmet need in total (i.e. over the plan period) to a highly constrained sub-region where unmet housing need is already a major issue and, moreover, where there is no strategic mechanism in place to address unmet need, such that there can be no confidence regarding where, when or even if unmet needs will be met.¹⁴
- 5.5.5 In this light, there is a strong argument to suggest that this scenario is 'unreasonable'. However, on the other hand, there is a need to consider the evolving national policy context in respect of the Green Belt, mindful of the Government's current [consultation](#) on "*Levelling-up and Regeneration Bill: reforms to national planning policy*". As discussed, the primary proposed change to the NPPF in respect of Green Belt policy is addition of the following statement within Section 13: "*Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period.*"
- 5.5.6 In this light, and on balance, it is reasonable to appraise (and consult upon) a growth scenario involving lowest growth across all three of the variable sub-areas. This is **reasonable growth scenario 1**.
- 5.5.7 The next port of call is then a scenario involving the higher density scenario at one or both of the urban sub-areas (town centre and the wider urban area). It is reasonable to explore only a single scenario involving higher density at both sub-areas (to minimise the total number of scenarios, and given the modest numbers of homes involved), which leads to a total supply of 215 dpa (although, to reiterate, the housing requirement would need to be lower). This is **reasonable growth scenario 2**.
- 5.5.8 Finally, there is a need to consider growth scenarios involving one or more Green Belt allocations, in addition to higher density across the two urban sub-areas. It is reasonable to assume that higher urban density is a pre-requisite for greenfield Green Belt allocation, given NPPF paragraph 141: "*Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need...*"

¹³ $(1,600+150)/18 = 97$ dpa

¹⁴ N.B. the Council has engaged with all neighbouring authorities directly, under the Duty to Cooperate, regarding the possibility of providing for unmet housing need from Epsom and Ewell, but all have replied saying that they are not able to do so.

- 5.5.9 There are numerous feasible combinations of Green Belt allocations; however, for the purposes of defining growth scenarios it is reasonable to assume a sequential approach to allocation, i.e. the sequentially preferable site option identified above (Hook Road Arena) would be allocated first, followed by the next sequentially preferable site (Horton Farm / Chantilly Way), followed by Downs Farm and so on.
- 5.5.10 As discussed, the first port of call is Hook Road Arena. However, as this is a modest sized site, it is considered reasonable to assume that it would also be allocated in combination with (nearby) Horton Farm / Chantilly Way. Total supply would be 308 dpa. This is **reasonable growth scenario 3**. In turn, **reasonable growth scenario 4** would involve additional allocation of Land adjoining Ewell East Station (total supply 327 dpa); and **reasonable growth scenario 5** would then involve additional allocation of Downs Farm (total supply 363 dpa).
- 5.5.11 The next two sequentially preferable sites are then SE of Epsom cluster and South of Manor Park. Two scenarios might be defined involving additional allocation of each of these sites in turn; however, it is reasonable to only define a single scenario involving allocation of both sites, with a view to keeping down the total number of scenarios for appraisal (and consultation). Total supply would be 418 dpa. This is **reasonable growth scenario 6**.
- 5.5.12 Assuming (for the sake of argument) a 10% supply buffer, leading to a housing requirement set at ~375 dpa, this scenario (Scenario 6) would involve generating around 3,600 homes unmet need, such that there is a clear strategic argument for exploring higher growth scenarios, i.e. scenarios involving further Green Belt release. However, the sites in contention for additional allocation (Drift Bridge Farm, Land NE of Reigate Rd and Langley Bottom Farm) all have very clear issues / drawbacks. There is also a need to consider in-combination impacts, notably in terms of traffic / road and junction capacity (particularly given a potential cluster of three closely related sites to the east of Epsom, also mindful of high car dependency at Langley Vale) and landscape / Green Belt (there would be a clear concern regarding the integrity of the landscape gap between Epsom and Banstead). Finally, there is a need to recall the evolving national policy context in respect of Green Belt, as discussed above.
- 5.5.13 In this light, and on balance, it is considered reasonable *not* to define a further higher growth scenario, i.e. a scenario involving a level of growth over-and-above reasonable growth scenario 6. It is important to recall that a central tenet of local plan-making under the NPPF is the potential to set a housing requirement that balances housing need and wider issues and opportunities (with any unmet need generated then provided for elsewhere).
- 5.5.14 Therefore, there are **six reasonable growth scenarios**, which are shown in the table and figure below. In summary, the reasonable growth scenarios are:
- Scenario 1: Lowest growth (housing requirement set at ~170 dpa, leading to very high unmet need)
 - Scenario 2: Scenario 1 plus higher densities in the town centre and wider urban area
 - Scenario 3: Scenario 2 plus allocation of Horton Farm and Chantilly Way
 - Scenario 4: Scenario 3 plus allocation of Ewell East
 - Scenario 5: Scenario 4 plus allocation of Downs Farm
 - Scenario 6: Scenario 5 plus allocation of Land south of Manor Park and the SE Epsom cluster
- 5.5.15 There are two final points to note:
- Employment land – some new employment floorspace would be delivered in Epsom town centre as a 'constant' across all the growth scenarios, plus existing employment land would be protected, such that employment land needs – as understood from the HEDNA (2022) – would be provided for in full.
 - Methodological caveats - there is invariably a need to make simplifying assumptions in order to arrive at a reasonable number of scenarios for appraisal and consultation, given the aim of arriving at scenarios that reflect the objectives of the plan (such that they essentially comprise alternative key diagrams).¹⁵ A key maxim is that *"the phrase all reasonable alternatives does not equate to all conceivable alternatives"*¹⁶ and there is a clear need for proportionality, in respect of defining reasonable alternatives.

¹⁵ The legislative requirement (Environmental Assessment of Plans and Programmes Regulations, 2004) is to appraise and consult upon reasonable alternatives *"taking account of the objectives and geographical scope of the plan..."*

¹⁶ See <https://www.aylesburyvaldc.gov.uk/sites/default/files/VALP/VALP%20Report.pdf#page=43>

Table 5.1: The reasonable alternative growth scenarios (with constant supply components greyed-out)

Supply component		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Commitments ¹⁷		1,041	1,041	1,041	1,041	1,041	1,041
Windfall supply ¹⁸		561	561	561	561	561	561
Epsom town ¹⁹	Hook Rd car park and SGN	860	1070	1070	1070	1070	1070
	Town Hall cluster						
	Depot Rd and Upper High St						
	Ashley Centre						
	Other sites						
Wider urban area ²⁰	Corridors, stations, centres	830	1042	1042	1042	1042	1042
	Wider urban area						
Industrial estates ²¹		0	0	0	0	0	0
GB PDL ²²	West Park	150	150	150	150	150	150
Green Belt ²³	Horton Farm / Chantilly Way and Hook Road Arena	0	0	1675	1675	1675	1675
	Ewell East	0	0	0	350	350	350
	Downs Farm	0	0	0	0	650	650
	S. of Manor Park & SE cluster	0	0	0	0	0	980
Total housing supply		3,442	3,864	5,539	5,889	6,539	7,519
Supply per annum*		191	215	308	327	363	418

* It is important to recall that the housing requirement would need to be set a lower figure, to ensure a supply buffer. Also, by way of context, it is important to recall that local housing need (LHN) is 576 homes per annum.

¹⁷ Commitments are homes set to come forward at sites with planning permission.

¹⁸ Windfall supply is the supply of homes that can be assumed to come forward at sites without a local plan allocation.

¹⁹ In the town centre the scenarios reflect a choice between lower and higher density across the supported LAA sites.

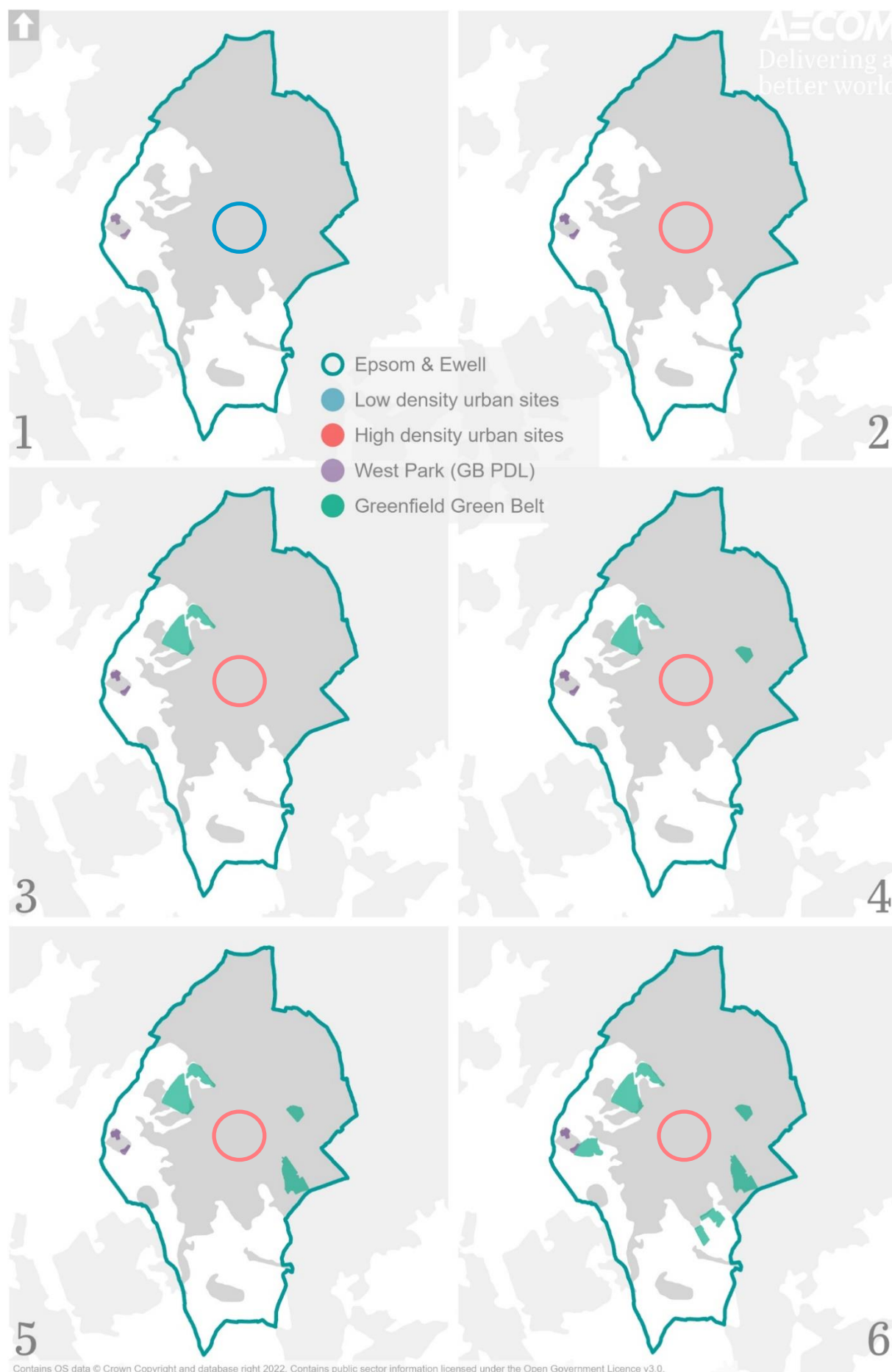
²⁰ In the wider urban area the scenarios reflect a choice between lower and higher density across the supported LAA sites.

²¹ There is no reasonable scenario involving housing supply from the two adjacent industrial estates.

²² There is only one reasonable scenario with regards to supply from previously developed land in the Green Belt.

²³ On balance, there is judged to be five reasonable scenarios with regards to housing supply from Green Belt sites.

Figure 5.5: The reasonable alternative growth scenarios



6 Growth scenarios appraisal

6.1 Introduction

- 6.1.1 Having defined reasonable alternatives in the form of six growth scenarios, the next step is to appraise them under the 'SA framework' (see Section 3).
- 6.1.2 The appraisal is presented below in the form of an appraisal 'matrix', comprising a column for each of the reasonable growth scenarios, and a heading for each of the 13 components of the SA framework. The appraisal matrix is followed by a supporting commentary.
- 6.1.3 Within each row of the appraisal matrix, the aim is to:
- **rank** the scenarios in order of performance (with a star indicating best performing; "=" indicating scenarios performing broadly on a par; and "?" indicating an inability to reach a conclusion); and then
 - **categorise** the performance in terms of 'significant effects' using **red** / **amber** / **light green** / **green**.²⁴
- 6.1.4 Further methodological discussion is presented in Section 8.

6.2 Appraisal findings

- 6.2.1 Appraisal findings are presented below.
- 6.2.2 To reiterate, the reasonable growth scenarios are:
- Scenario 1: Lowest growth (housing requirement set at ~170 dpa, leading to very high unmet need)
 - Scenario 2: Scenario 1 plus higher densities in the town centre and wider urban area
 - Scenario 3: Scenario 2 plus allocation of Horton Farm and Chantilly Way
 - Scenario 4: Scenario 3 plus allocation of Ewell East
 - Scenario 5: Scenario 4 plus allocation of Downs Farm
 - Scenario 6: Scenario 5 plus allocation of Land south of Manor Park and the SE Epsom cluster

²⁴ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

Table 6.1: Reasonable alternative growth scenarios appraisal

Topic	Scenario 1 Low growth	Scenario 2 Scen. 1 + Higher density	Scenario 3 Scen. 2 + Hook Rd Arena	Scenario 4 Scen. 3 + Horton Farm & Chantilly Way	Scenario 5 Scen. 4 + Downs Farm	Scenario 6 Scen. 5 + S. of Manor Park & SE Epsom
Accessibility	4	3	2	★1	2	2
Air quality	5	4	3	★1	★1	2
Biodiversity	3	2	★1	★1	★1	3
Climate change adaptation	=	=	=	=	=	=
Climate change mitigation	4	3	2	★1	3	3
Communities	=	=	=	=	=	=
Economy and employment	6	5	4	3	2	★1
Historic environment	3	3	★1	★1	2	4
Housing	6	5	4	3	2	★1
Land and soils	2	★1	★1	★1	★1	★1
Landscape	2	★1	★1	★1	3	4
Transport	4	3	2	★1	2	3
Water	?	?	?	?	?	?

Discussion

There are three immediate points to note.

- Scenarios 3 and 4 are shown to perform well under a relatively high number of topic headings, and to perform poorly under relatively few topic headings. This is an indication that these scenarios perform well overall, however, this conclusion cannot be taken from the appraisal with any certainty. This is because the appraisal is undertaken without any assumptions made regarding the degree of importance (or 'weight') that should be assigned to each topic heading in the decision-making process. In short, the intention is not for the scores in each column to be tallied-up in order to arrive at an overall score for each of the scenarios.
- Scenario 1 (low growth) is shown to perform relatively poorly under most topic headings, with the exception of 'Landscape (reflecting an understanding that Borough is associated with particular constraint in this respect). This reflects an assumption that Scenario 1 would generate the highest level of unmet housing need that, in turn, would need to be met elsewhere within a constrained sub-region. The locations where unmet need would be met are not known, but that in itself serves as a reason for proactively planning to meet the borough's housing needs as fully as possible through the local plan. High unmet need would lead to pressure for growth elsewhere at locations that could perform poorly, potentially in wide-ranging respects.
- All the scenarios are associated with pros and cons, which is invariably the case when dealing with scenarios that are 'reasonable'. It is for the Council, as decision-maker (not SA), to weigh-up the pros and cons of each scenario, and reach a conclusion on which best represents sustainable development on balance.
- No differential effects – is the conclusion under two headings. These topic headings are considered less central to the appraisal, but that is not to say that there are not a range of issues to consider.
- Uncertain effects - is the conclusion under one heading reflecting a need for further evidence-gathering.

Having made these opening points, the following bullet points consider each of the topic headings in turn:

- **Accessibility** – to community infrastructure is a key issue for local plan-making. There is a need to deliver new and upgraded capacity, to the benefit of the new and existing communities. **Horton Farm** is supported, in this respect, on account of its scale, although more work is needed to confirm precisely what will be delivered. Engagement with the County Council to date has not confirmed the need for a primary school (declining birth rates over the years following the 2008 recession is a factor), but schemes of this scale are typically able to provide land for a primary school if required. Furthermore, the site links well to existing retail parades, with several to the west of Epsom (see Figure 5.2, above), which is also a factor in support of **Hook Road Arena** (the B2200/B284 is something of a strategic corridor). Also, and more generally, strategic growth to the west of Epsom will complement recent growth associated with the former hospitals cluster, with place-making opportunities that can be explored further prior to plan finalisation. With regards to Land adj. Ewell East Station (**Scenario 4**), this will deliver new retail provision to meet a local need. With regards to Downs Farm (**Scenario 5**), 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 in the borough, even under a higher growth scenario akin to Scenario 5. Under **Scenario 6**, there is little reason to suggest any particular additional community infrastructure-related opportunity, and it could feasibly be the case that growth comes forward in a somewhat piecemeal way that serves to increase pressure on existing community infrastructure capacity locally (particularly if the SE cluster proves not to be deliverable as a single, comprehensive scheme, given divided land ownership). With regards to the final two scenarios, **Scenario 2** is preferable to Scenario 1 as higher density development in the urban area will lead to opportunities to deliver new community infrastructure over-and-above lower density development, plus exporting unmet need is generally not supported given the possibility of unmet need ultimately being met in locations / in a way that is problematic, or sub-optimal, in terms of accessibility to community infrastructure.
- **Air quality** – is not a major issue locally, with just one designated air quality management area (AQMA), which is within Ewell (such that it is relatively distant from most of the Green Belt site options that are the primary variable across the growth scenarios). However, [Figure 2.2](#) of the SR does show another dataset, which shows that air quality is higher in rural West Surrey than in suburban East Surrey. The appraisal conclusions reflect two factors. Firstly, generating **unmet need** is problematic in transport terms and so, in turn, also for air quality. Also, some towns in the sub-region that might feasibly be a focus for unmet need are notably constrained in air quality terms. Secondly, the additional sites allocated under **Scenario 6** are less well-connected in transport terms, and so, in turn, are potentially problematic for air quality. Noise pollution is another consideration here, but it is not clear that any of the potential growth locations are significantly constrained in this respect (higher densities can give rise to challenges). Finally, it is noted that there is a primary school adjacent to Horton Farm, which is a 'sensitive receptor' that will require further consideration.

- **Biodiversity** – a high proportion of the borough's Green Belt is at least of local importance for biodiversity, and nationally important Epsom Common SSSI is a key constraint. The appraisal reflects to key factors. Firstly, **unmet need** from East Surrey is problematic for biodiversity, given a high level of constraint affecting West Surrey, including the internationally important Thames Basin Heaths Special Area of Conservation (SAC). Secondly, under **Scenario 6** it is assumed that there would be a need to allocate Land south of Manor Park, which is adjacent to Epsom Common SSSI, and also subject to wider biodiversity constraint, with the land clearly contributing to connectivity between Epsom Common and Horton Country Park. All the other Green Belt site options in question are also constrained by proximity to a locally designated SNCI to some extent, but this is most significantly the case for **Land adj. Ewell East Station**, which 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).
- **Climate change adaptation** – a key consideration for local plans is invariably **flood risk**, although there are also a wide range of other climate change adaptation / resilience considerations, including overheating risk. None of the Green Belt site options in question are constrained by fluvial (river) flood risk, and whilst **surface water flood** risk is much more widespread, it can typically be dealt with effectively at the development management stage. It seems unlikely that surface water flood risk would be a constraint to effective masterplanning at any of the Green Belt sites in question (N.B. Horton Farm is most constrained). Finally, with regards to the **urban area**, a small proportion of the proposed supply is associated with sites notably affected by either fluvial or significant surface water flood risk; however, intensifying the use of previously developed sites subject to a degree of flood risk is quite common practice, given good potential to avoid or suitably mitigate flood risk through detailed measures, including through building design. Having said this, there is a need for caution, when seeking to deliver new homes at sites that have historically been seen as suitable for uses with low vulnerability to flood risk (e.g. employment, car parking), mindful of climate change scenarios. **Higher density** redevelopment can feasibly make avoiding/mitigating flood risk more challenging, but this is uncertain. It is a detailed matter for further consideration through town centre masterplanning work.
- **Climate change mitigation** – it is challenging to differentiate between the scenarios with confidence, including because of a need to balance objectives around minimising per capita greenhouse gas emissions from both **transport** (which is a focus of discussion under other topic headings) and the **built environment**. The appraisal reflects three key factors. **Firstly**, unmet need is considered highly problematic for transport emissions, because there is a clear-cut 'transport' argument for meeting housing needs close to where they arise. **Secondly**, Land adj. Ewell East Station is clearly supported from a perspective of minimising transport emissions. **Thirdly**, strategic urban extensions can give rise to a built environment decarbonisation opportunity over-and-above piecemeal urban extensions (all other things being equal). Specifically, this might be in terms of: A) achieving standards of building design that go beyond the requirements of Building Regulations (which are in the process of being tightened to the point of requiring a 'Future Homes Standard'); B) realising opportunities for heat networks through higher density mixed use development; and/or C) realising opportunities for decentralised power systems, linking supply (solar PV) and demand (heat pumps, EV charging) via use of battery storage and smart technologies, in order to minimise strain on the national grid. There is currently limited evidence to suggest that **Horton Farm** represents a *particular* opportunity, in respect of minimising per capita built environment emissions, but this is a matter that can be explored further through the consultation (all Green Belt site promoters are encouraged to submit evidence to enable differentiation between the options). It is noted that the latest scheme proposal received from the **Downs Farm** promoters does include densities up to 65 dpa, but there is little reason to assume that this higher density would be deemed appropriate in practice. Finally, there is clear support for maximising **density** within the urban area, from both a transport and built environment greenhouse gas emissions perspective.
- **Communities** – this is an opportunity to discuss matters over-and-above the key matter of accessibility to community infrastructure, which is a focus of discussion above. With regards to **Horton Farm** and **Hook Road Arena**, the view is that there is a general opportunity to contribute to place-making to the northwest and west of Epsom, which is where recent housing growth has been focused, through the redevelopment of the former hospital sites. Hook Road Arena will deliver a new sports hub and, whilst further work is needed to confirm what Horton Farm will deliver and 'bring' to the local area, there can be confidence of a high-quality development that achieves 'planning gain'. As part of this, there will be a need to deliver strategic green infrastructure and, related to this, it is expected that the scheme will be comprehensive in the sense of 'completing' the expansion of Epsom in this direction (as far as Horton Country Park). A final consideration, in respect of these sites to the NW of Epsom, is that this part of the borough is associated with a degree of relative deprivation, at least in comparison to the rest of the borough (which is overall affluent; see [Figure 6.1](#) in the SR), serving to emphasise the need to realise opportunities for wider place-making and planning gain.

With regards to **Downs Farm**, it is more difficult to confidently predict development delivering significant benefits to the local community. The proposed greenspace – which would likely be necessary to make any scheme acceptable in Green Belt terms – is of note, but the existing community already appears to have quite good access to greenspace, including strategic greenspace. It is noted that work completed by the site promoters suggests a strategic green infrastructure opportunity around new accessible greenspace onsite serving as a ‘steppingstone’ between Epsom Common / Epsom Downs and Banstead Downs, but the significance of any benefit is not entirely clear. It is noted that the proposal is not to offer the extensive area of land to the south of the A2022 (which is in the same land ownership) as strategic greenspace. In this respect, there is also the need to note the possibility of creating / restoring chalk grassland in this area, noting what has been achieved at nearby Priest Hill Nature Reserve. It is also noted that the site is surrounded by existing properties on two sides, such that there will inevitably be a degree of impact to residential amenity.

With regards to the additional sites that, it is assumed, would be allocated under **Scenario 6**, there is again limited potential to confidently suggest that these options have particular merit, from a ‘communities’ perspective. Land to the south of Manor Park could potentially serve to complement adjacent recent growth locations (former hospital sites), and it is noted that the proposal under all scenarios is for a further ~150 homes to be delivered at the adjacent Manor Park hospital site; however, a preferable scenario, from a ‘communities’ perspective might involve limited housing growth aligned with delivery of new accessible green infrastructure, including with a view to enhancing links between Epsom Common and Horton Country Park.

In summary, there are clearly wide-ranging factors at play, but it is difficult to reach an overall conclusion.

- **Economy and employment** – the proposal at Downs Farm includes a small amount of new employment floorspace, and there would be the potential to explore the possibility of delivering similar at Horton Farm (subject to further masterplanning work, e.g. considering the possibility of delivering a mixed use community hub, which is something that might typically be expected for a scheme of this scale). However, the overriding consideration here is that none of the Green Belt sites in question would deliver significant new employment land. In turn, the primary consideration here is the need to deliver new homes in order to support the local economy, recognising the needs of businesses in terms of access to a suitably skilled local workforce. House prices and lack of specific housing types and tenures, including family and affordable housing, can be a major issue for the effective functioning of local economies. Also, there is a need to consider the importance of suitable housing in terms of supporting productive home working and individual productivity more generally. Finally, with regards to the urban area, it may be that support for higher density schemes leads to enables delivery of additional new employment floorspace, but this is somewhat uncertain at this stage. The primary aim of supporting a boost to development densities is to deliver additional homes. It is not clear that higher density leads to any particular added opportunity for student accommodation.
- **Historic environment** – is a key consideration enabling differentiation between the growth scenarios. Beginning with **Scenarios 1 and 2**, higher density development in the urban area (Scenario 2), and potentially the town centre in particular, gives rise to significant tensions with historic environment objectives, in the Epsom and Ewell context. However, on the other hand, exporting unmet need (highest under Scenario 1) is potentially problematic, given the lack of any certainty regarding where unmet need will / might ultimately be met, and given widespread historic environment constraint across Surrey and the wider sub-region.

With regards to the remaining scenarios, the first point to note is that **Scenario 6** performs very poorly, because of the degree of constraint affecting Land south of West Park. There is uncertainty as to whether the land falls within a conservation area (discussed above); however, regardless, the land relates very closely to the two western-most components of the Hospitals Cluster Conservation Area (see Figure B above; also [Figure 8.1](#) in the SR). Also, under Scenario 6, the assumed SE Epsom cluster is subject to a degree of constraint, given the adjacent Epsom Cemetery, and also the former rifle butts that comprises a central component of this cluster, and which is associated with a bridleway and mature field boundaries. All these features appear on the pre-1914 OS map, as does nearby Epsom Racecourse (which dates from the C17th).

With regards to **Horton Farm**, the site relates closely to *three* components of the Hospitals Cluster Conservation Area, and one of the components (Horton Farm) is on the national Heritage at Risk Register. Also, there is a listed farmhouse onsite. However, it is not clear that the land parcel (area of farmland) contributes significantly to appreciation of the conservation area (as a whole), and there could well be the potential for sympathetic development to complete the ‘story’ of reimagining the historic hospitals cluster. Much depends on the scale of growth (possibly <1,500 homes) and the detailed approach that is taken to masterplanning and design, and there would be a clear need to work closely with Historic England.

Finally, **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. Again, there is a need to gather further evidence through consultation.

As a final point, it is important to recall that, as well as the package of urban sites that feature across all the scenarios (discussed above), under all scenarios there is also the assumption that Land at West Park would be allocated for 150 homes. This would involve redevelopment of underused NHS land within and adjacent to the West Park component of the Hospitals Cluster Conservation Area, hence there will be a need to undertake further work in collaboration with Historic England. The aim might be for 'heritage-led' development that learns lessons from recent good practice / experiences elsewhere in the former hospitals cluster.

- **Housing** – whilst there is (and has always been) flexibility to set a **housing requirement** below LHN, from a 'housing' perspective there is a clear need to set the housing requirement at LHN if at all possible and, if this is not possible, set the housing requirement at a figure as close as possible to LHN. This is the key factor that enables differentiation between the alternative growth scenarios. There are two other key considerations here. Firstly, there is a need to recognise that greenfield (Green Belt) sites are typically well suited to delivering a **good housing mix**, including a mix of types (including family housing), tenures (i.e. a good mix of affordable housing tenures, mindful of extremely high needs, as discussed above) and specialist housing, including for older people (although urban sites can also be well suited to some types of older persons housing, given good levels of accessibility). Brownfield sites can tend to face viability challenges (at least relative to greenfield sites) that lead to challenges in respect of delivering a good housing mix. Secondly, the scale of Horton Farm (also its configuration, with a plethora of access options) means that it is very well suited to providing for **Gypsy and Traveller accommodation needs**. The Council has recently completed an accommodation assessment, which finds that there is a need for 10 pitches for those who meet the 'planning definition' set out within the Government's Planning Policy for Traveller Sites (PPTS, 2015), which essentially relates to ongoing active travelling, or otherwise a full 'cultural' need for 18 pitches. Recent legal precedent lends weight to providing for the full 'cultural' need (in order to avoid discrimination against those who cannot travel), which is at a level (18 pitches) that could prove challenging to meet in the local context. Delivering new pitches as part of strategic urban extensions is not necessarily an ideal solution, but is a key option to explore in the Epsom and Ewell context (and, as discussed, Horton Farm is well suited). There are important masterplanning considerations that will warrant further work, e.g. there would likely be a strong argument for several smaller sites (e.g. comprising ~3 or 4 pitches) rather than one large site.
- **Land, soils and resources** – Horton Farm and Downs Farm are either in productive agricultural use or have the potential to be, whilst the other Green Belt site options in question appear to have less agricultural potential, e.g. more suited to grazing horses or, in the case of Land adj. Ewell East Station, sports pitches. None of the site options in question have been surveyed in detail to ascertain the grade of **agricultural land** (see the 'post 1988 criteria' dataset available at magic.gov.uk), but the nationally available low resolution/accuracy 'provisional' agricultural land quality dataset shows all agricultural land in the borough to be either 'grade 3' quality (which may or may not be 'best and most versatile, which the NPPF classes as land that is of grade 1, 2 or 3a quality) or 'grade 4' quality. Specifically, there is a prevalence of grade 4 quality land in the south of the borough, which could potentially mean that Horton Farm comprises higher quality agricultural land than is the case for Downs Farm; however, there is no certainty in this respect. There are two further considerations. Firstly, with regards to **unmet need**, it is fair to predict that scenarios involving high levels of unmet need would lead to pressure on productive, and potentially higher grade, agricultural land over-and-above scenarios involving meeting more of Epsom and Ewell's housing need in the borough. However, this is a fairly marginal consideration, as the national 'provisional' dataset does not show a high prevalence of higher quality (grade 2) quality land across the wider sub-region. There is a concentration of higher quality agricultural land to the west of Epsom (e.g. Spelthorne and Runnymede), but there is little or no potential for unmet need for Epsom and Ewell to be provided for there. Secondly, whilst there do not appear to be any minerals [safeguarding areas](#) intersecting the borough, there is a '**waste consultation area**' associated with a waste transfer site adjacent to Downs Farm (former Epsom Chalk Pit / Lime Works). This is a constraint to development but has been accounted for in masterplanning proposals received to date.
- **Landscape** – is clearly a key consideration. Beginning with **Scenarios 1 and 2**, the new emphasis on protecting local character in the draft NPPF (December 2022) is noted; however, a key consideration here is a need to support higher densities in order to reduce pressure on sensitive greenfield locations (whether within Epsom and Ewell or the wider sub-region). With regards to **Scenarios 3 and 4**, it is not possible to conclude that these scenarios perform worse than Scenario 2 (urban area only) once account is taken of the extensive landscape constraints affecting the wider sub-region, including the Surrey Hills AONB and the High Weald AONB (constraining Horsham and land south of Crawley) and the Area of Great Landscape Value that essentially extends the Surrey Hills AONB. Unmet need from Epsom and Ewell would not be provided for in one of these designated landscapes (certainly not an AONB), but the presence of these designated landscapes serves to indicate the scale of the challenge. Both Horton Farm and Land adjoining Ewell East Station have their landscape challenges, but these are considered to be fairly limited.

With regards to **Hook Road Arena**, this site is thought to perform strongly in landscape terms on account of its strong containment by existing built form, although there is a historic TPO tree belt at the northern extent.

With regards to **Horton Farm**, this is a historic area of farmland closely associated with the Hospitals Cluster, surrounded by historic roads/lanes on three sides, and with the majority of the historic field boundaries shown on the pre-1914 OS map still present. However, there are no public rights of way intersecting or adjacent to the site (other than footways along the roads), and along the entire perimeter of the site the roads appear to have been widened and otherwise modernised (including with near complete coverage of offroad cycle paths), which likely limits any sense of rurality. There are widespread views into the site from the adjacent roads and associated pedestrian / cycle paths, but these are filtered views through hedgerows (of varying thickness / quality, and with some standard trees) and, whilst the land does rise to the west, it is not clear that there are extensive views into or across the site that are likely to be of particularly high value (this will require further consideration through masterplanning, noting that the current proposal is to focus greenspace on lower land subject to surface water flood risk). Finally, there is a need to note limited or no concern that development would lead to a risk of future development creep / sprawl, i.e. there is confidence in being able to define a defensible new Green Belt boundary. Given an assumption that Horton Country Park will be protected in perpetuity, the only slightly 'softer' boundary is to the northeast, where there is a woodland cemetery, a conservation area (part of the former hospitals cluster and a riding school for people with disabilities).

With regards to **Land adjoining Ewell East Station**, the site is considered well-contained in Green Belt terms, but there is an adjacent historic bridleway. It will likely be possible to mitigate visual impacts from here. Finally, with regards to **Scenarios 5 and 6**, the sites in question are judged to be constrained in landscape terms, such that the scenarios perform poorly, even though there would be reduced unmet need. Beginning with Downs Farm, the land here begins to rise towards Epsom Downs, and there is a concern in respect of securing a defensible new Green Belt boundary. Specifically, the concern would be that development leads to subsequent pressure to release the parcel of land to the south of the A2022 which, in turn, would lead to a risk of coalescence between Epsom and Banstead. It is recognised that concerns are reduced on account of the proposed greenspace within the Downs Farm site (on the high point of the site), and also given the presence of the aforementioned waste transfer facility, but a degree of concern remains. It is not clear whether land south of the A2022 would be made available for public greenspace (at the expense of productive agricultural land). Moving on to Land south of Manor Park, the extent of woodland TPOs may indicate a good degree of visual containment; however, a concern is the intersecting and adjacent public rights of way, including the Thames Downs Link long distance path (bridleway), which links Epsom Common to Horton Country Park. Finally, with regards to the SE of Epsom cluster, there is a clear landscape concern given quite steeply rising land, the nearby Epsom Downs viewpoint (although there is intervening woodland, which may provide screening); also a historic bridleway passing through the cluster, linking Epsom to Epsom Downs.

- **Transport** – is another key consideration influencing both definition of the RA growth scenarios (see discussion above) and their appraisal. Avoiding unmet need, as far as possible, is crucially important from a transport planning perspective, not only because housing need met distant from source leads to 'unstainable' travel patterns, but also because effective strategic planning for transport infrastructure (led by the County Council, National Highways and Transport for the South East) requires a degree of certainty regarding where housing growth will occur. With regards to the Green Belt site options in question, key considerations have already been discussed above, and the following is a summary: **Hook Road Arena** performs very well; **Horton Farm** has reasonable train and bus connectivity, very good cycle connectivity, including to existing local centres (there are offroad routes on nearly all sides of the site), very good road access (subject to further work), and there is a clear opportunity to better-connect the somewhat isolated existing community of Long Grove; **Land adjoining Ewell East Station** has excellent train connectivity and also good access to bus services along the A24; 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 is not as good as from Epsom (in particular) and Ewell East); and the **other two site options** perform notably less well (although Land South of Manor Park is in relative proximity to Epsom town centre, and there are cycle routes in the area, and a bus service, following recent development).
- **Water** – a key consideration is often capacity at wastewater treatment works (and the environmental capacity of the water courses that receive treated wastewater), but there is currently a lack of evidence in respect of any issues. Issues tend to be associated with more rural areas; however, on the other hand, the borough is associated with the headwaters of two river systems (Hogmill and Mole). Also, the chalk aquifer underlying the southern part of the borough may be a constraint to growth. However, once again, it is also fair to flag a concern with unmet housing need. For example, Crawley and Horsham fall within the Sussex North Water Resource Zone, where all new development must demonstrate [water neutrality](#) (and development is currently unable to do so, ahead of offsetting schemes being set up).

7 The preferred approach

7.1 Introduction

- 7.1.1 As discussed, it is not the role of the appraisal to arrive at a conclusion on which of the growth scenarios is best, or ‘most sustainable’ overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal. This section presents the response of EEBC to the appraisal.

7.2 Selecting the preferred scenario

- 7.2.1 The following statement explains EEBC officers’ reasons for supporting **Scenario 4**:

“Meeting housing need locally is a priority issue, and generating unmet need leads to a wide range of issues at the Surrey / sub-regional scale. However, the appraisal serves to highlight a range of drawbacks to higher growth. As such, the plan seeks to follow a middle path, striking a balance between competing objectives.

In particular, the appraisal serves to highlight significant drawbacks to Scenarios 1 and 6, and we believe that significant weight can be attributed to these drawbacks, such that Scenarios 1 and 6 are judged to perform poorly overall. With regards to Scenario 1, we agree that there is a need to take steps to minimise unmet housing need as far as possible. There is a national and local housing crisis, for example mindful that only 15 affordable homes have been delivered in total over the past two monitoring years, in comparison to an identified need for 652 per annum. Furthermore, minimising unmet housing need is important from wide-ranging other perspectives, including from a perspective of supporting the local and sub-regional economy supporting the achievement of transport, decarbonisation and certain environmental objectives. With regards to Scenario 6, it is recognised that the effect would be to minimise unmet housing need; however, the predicted impacts to the local area are cumulatively judged to be unacceptably high. Fundamentally, Epsom and Ewell is a heavily urbanised borough where remaining parcels of undeveloped Green Belt land are precious and must be protected. This is the widespread view locally, but this view also aligns strongly with latest Government policy.

The merits of the four middle performing scenarios are more finely balanced. However, it is considered appropriate to highlight Scenario 2 as performing least-well. This is because of the level of unmet housing need that would be generated. There is a need to release some greenfield Green Belt land for development.

Differentiating between the overall merits of Scenarios 3, 4 and 5 is more challenging. However, on balance, Scenario 5 is judged to be the least preferable of the three. The site that would be additionally allocated under this scenario – Downs Farm – is subject to considerable landscape constraint, particularly in the sense that development could put at risk the ability to maintain a defensible landscape gap between Epsom and Banstead in this area. Also, the site would deliver limited benefit to the local area (the proposed school is noted, but there is not currently known to be a need for a new school in the borough, even under higher growth scenarios) and the proposed walking/cycling link to Epsom Downs Station is somewhat indirect. These conclusions are reached on the basis of scheme assumptions that are subject to change, and it is recognised that the option of housing growth here may require further consideration, recognising the importance of closing the gap to housing need.

Looking at Scenarios 3 and 4, there is a clear preference for **Scenario 4** as this is a higher growth scenario and because the site additionally allocated under this scenario, namely **Land adjoining Ewell East Station**, is judged to perform well in several respects. In particular, it performs well in transport terms, given the adjacent train station, but it will also make provision for retail to meet an existing need within the local area. There are some challenges to bringing the site forward, most notably in respect of providing sports pitches, but these are not insurmountable, and there is also good potential to define a new defensible Green Belt boundary, given Nescot (North East Surrey College of Technology) playing fields to the west, built form to the north and east and Priests Hill SNCI to the south. For all these reasons, there are judged to be exceptional circumstances to justify the release of this land from the Green Belt.

Finally, with regards to the three other greenfield Green Belt sites proposed for allocation under Scenario 4 (Horton Farm / Chantilly Way and Hook Road Arena), the discussion presented above has already served to explain why there is support for allocating these sites and why exceptional circumstances to justify the release of these sites from the Green Belt are judged to exist. However, for completeness, key considerations include:

- **Horton Farm** – is subject to limited constraint and there is the potential for a ‘strategic’ urban extension that delivers a good mix of housing *and more* (including land for Gypsies and Traveller pitches, which is a very important consideration); indeed, it is the only option to deliver a strategic urban extension that is known to exist (if Downs Farm is judged not to warrant this status). The site performs reasonably well in transport terms, and there are few if any concerns regarding future development creep / sprawl. Furthermore, it is anticipated that growth here will complement the development that has happened to the west of Epsom across the former hospitals cluster sites (following the Core Strategy, 2007), from a place-making perspective. At the current time it is not clear whether a primary school is needed, but it is anticipated that there would be the potential to deliver one should the need be identified through the consultation on the Draft Local Plan.
- **Chantilly Way** – is a small site that links very closely to Horton Farm, and gives rise to few concerns. There is a question regarding the appropriate number of homes to deliver on site, given its linear configuration.
- **Hook Road Arena** – performs well on the assumption of built form in the southern part of the site only, with a new sports hub delivered in the northern part. Ewell East Station is nearby, and this is Council owned land, which leads to confidence and flexibility in respect of what can be delivered onsite.”

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

8 Introduction to Part 2

- 8.1.1 The aim of this part of the report is to present an appraisal the current draft plan (as a whole).
- 8.1.2 In practice, the appraisal builds upon the appraisal of Growth Scenario 4 presented in Section 6. Specifically, the appraisal revisits the appraisal of Growth Scenario 4 with added consideration given to:
- site allocations that are a 'constant' across the growth scenarios; and
 - draft policies (borough-wide, area-specific and site-specific).

Overview of the plan

- 8.1.3 The plan presents 43 policies under the following headings:
- Spatial strategy
 - Site allocations
 - Homes for all
 - Economy
 - Built and natural environment
 - Infrastructure
- 8.1.4 The appraisal focuses on policies under the first two headings, whilst also considering how other policies will serve to mitigate the impacts of growth and ensure that growth-related opportunities are realised.

Appraisal methodology

- 8.1.5 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each of the sustainability topics in turn, the aim is to discuss the merits of the draft plan local plan, as a whole, before reaching an overall conclusion on significant effects. Specifically, the regulatory requirement is to "identify, describe and evaluate" significant effects.
- 8.1.6 Conclusions on significant effects are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations. Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the local plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future). In light of this, there is a need to make considerable assumptions regarding how the plan will be implemented 'on the ground' and the effect on particular receptors. Assumptions are discussed in the appraisal text where necessary.
- 8.1.7 The appraisal aims to strike a balance between, on the one hand, a need to be systematic with, on the other hand, a need for conciseness and accessibility. As part of this, it is important to note that, under each of the 13 topic headings, the aim is *not* to systematically discuss each and every site allocation and policy, nor each and every one of the issues/objectives identified at the SA scoping stage.

Table 8.1: Structure of each topic-specific appraisal

Heading	Information provided under each heading
Commentary on the spatial strategy	The aim is to discuss the proposed site allocations, both in isolation and in combination, also mindful of site-specific policy.
Commentary on thematic policies	Discussions are relatively brief, because thematic policies tend to give rise to limited effects/ tensions with sustainability objectives, in comparison to the spatial strategy.
Conclusion on the draft plan	The aim is to formally conclude on significant effects. In practice, the aim is to conclude on the effects of the spatial strategy mindful of the extent to which issues/tensions will be addressed, and opportunities realised, through site-specific and district-wide policy.

9 Appraisal of the draft plan

- 9.1.1 This section presents an appraisal of the proposals presented across the current draft plan consultation document as a whole. The appraisal is presented as a series of narratives under the SA framework (see Section 3), with each narrative presented under three sub-headings, as introduced above.

9.2 Accessibility

Commentary on the spatial strategy

- 9.2.1 The masterplan-led approach to growth in the **town centre** will likely support new provision of community infrastructure and retail, as well as an improved public realm and additional homes, supporting the ongoing viability and vitality of the town centre.
- 9.2.2 With regards to the **wider urban area**, there are not known to be any stand-out opportunities to support enhanced (or maintained) community infrastructure capacity, but this is a matter that can be explored further subsequent to the current consultation.
- 9.2.3 With regard to site **SA5 (Land at West Park Hospital)**, which forms part of the spatial strategy, whilst this site is further from Epsom Town Centre, it is still relatively well served by public transport, including regular and direct bus routes into Epsom Town Centre.
- 9.2.4 Accessibility to community infrastructure is a key issue for local plan-making. There is a need to deliver new and upgraded capacity, to the benefit of the new community and ideally also the existing.
- 9.2.5 Green Belt site **SA6 (Horton Farm)**, which is allocated through the spatial strategy, is supported in this respect, on account of its scale, although more work is needed to confirm precisely what will be delivered. Engagement with the County Council to date has not confirmed the need for a primary school (declining birth rates over the past decade or more is a factor), but schemes of this scale are typically able to provide land for a primary school if required. Furthermore, the site links well to existing local retail parades, with a high density of retail parades in this area, to the west of Epsom (see Figure 5.2, above).
- 9.2.6 Proximity to existing centres and retail parades is also a factor in support of **SA9 (Hook Road Arena)**, with a notable cluster of retail parades along the B2200/ B284, which can be described as a strategic movement corridor. In addition, more generally, strategic growth to the west of Epsom will complement recent growth associated with the former hospitals cluster, with place-making opportunities that can be explored further prior to plan finalisation.
- 9.2.7 Green Belt site **SA8 (Ewell East Station)** supports accessibility to public transport, specifically Ewell East Station, as well as to services and facilities and employment opportunities in Ewell village. The scheme will also deliver new retail provision (e.g. a small supermarket), which is understood to be something that is needed within the local area.

Commentary on thematic policies

- 9.2.8 Many policies within the draft plan are broadly supportive of accessibility objectives, including, but not limited to, policies **S17** (Green Infrastructure), **DM15** (Open Space, Sport and Recreation), and **S18** (Transport). No policies can be identified that give rise to a significant tension with accessibility objectives.

Conclusion on the draft plan

- 9.2.9 In conclusion, as per the discussion in Section 6 of the report, **moderate positive effects** are predicted. The spatial strategy will deliver new community infrastructure and support the vitality of existing centres, and growth is directed to locations with good access to existing community infrastructure (although certain proposed allocations are associated with less accessible locations). Also, the proposed suite of thematic policies should support accessibility to green / open space, services and facilities (including recreational facilities) and employment opportunities. A key matter for further consideration, subsequent to the current consultation, is in respect of schools capacity, including in the vicinity of Horton Farm.

9.3 Air quality

Commentary on the spatial strategy

- 9.3.1 There is one AQMA in Epsom and Ewell, which is Ewell AQMA, located along the B2200 in the centre of Ewell. Proposed allocation **SA8 (Land adjoining Ewell East Station)** is 670 metres southeast of Ewell AQMA; however, as the site is located adjacent to Ewell East railway station, there should be the potential to deliver a low car development, which would minimise concerns regarding traffic through the AQMA.
- 9.3.2 More broadly, the preferred strategy focuses growth in locations that are most accessible to services and facilities, public transport hubs and employment opportunities, including **Epsom Town Centre** and the **wider urban area**. By doing so, the spatial strategy encourages the use of active travel and public transport, with positive implications on air quality.
- 9.3.3 There is also a need to consider the matter of total **growth quantum**, i.e. the proposal to set the housing requirement at a figure significantly below LHN. Matters are discussed in detail in Section 6; however, in brief, there could potentially be implications for air quality.
- 9.3.4 Whilst the spatial strategy includes some sites further from Epsom Town Centre, including site **SA5 (Land at West Park Hospital)**, these sites are still relatively well served by public transport, including regular and direct bus routes into Epsom Town Centre. In this respect, whilst these sites are more likely to encourage the use of private car, there are alternative modes of transport available to residents.
- 9.3.5 The spatial strategy includes a large strategic site, site **SA6 (Horton Farm)**, which will deliver a minimum of 1,500 dwellings. The development of this site is likely to support improvements to pedestrian and cycle infrastructure in this part of the borough; however, it is noted that there is a primary school adjacent to Horton Farm, which is a 'sensitive receptor' that will require further consideration.

Commentary on thematic policies

- 9.3.6 Policy **DM12** (Pollution and Contamination) outlines that all development proposals must demonstrate that significant new emission sources will be suitably mitigated to be as low as reasonably practicable. In addition, where existing air pollution hotspots exist, such as Ewell Village, development must be designed to minimise the occupants' or users' exposure to air pollution, both internally and externally.
- 9.3.7 Another key consideration for good air quality is the use of clean modes of travel, including walk and cycling. With regard to this, Policy **S18** (Transport) highlights that existing walking and cycling routes in the borough will be improved, especially those that connect residential areas to local services and facilities, bus stops and railway stations. The policy also supports electric vehicle (EV) charging infrastructure.

Conclusion on the draft plan

- 9.3.8 In conclusion, as per the discussion in Section 6 of the report, it is appropriate to predict **neutral effects** at this stage. 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, providing for unmet housing need distant from source can lead to problematic travel patterns, and some towns in wider Surrey are subject to significant air quality constraint.
- 9.3.9 The wider context is the national switch-over to EVs, which is set to result in significant improvements to air quality nationally. However, air quality will remain an important issue for spatial planning, including because EVs are heavier vehicles that can generate significant particulates pollution, including from brake and tyre wear and from road dust.
- 9.3.10 Aside from air quality, noise pollution is another key 'environmental quality' consideration. It is difficult to draw strong conclusions, given good potential for mitigation, and given that noise pollution affects house prices and so is a factor that is somewhat addressed by market forces. However, it is noted that several proposed allocations are adjacent to the main railway line (including Land adj. Ewell East) or the A24 dual carriageway at Ewell.

9.4 Biodiversity

Commentary on the spatial strategy

- 9.4.1 In terms of **designated sites for biodiversity**, the western side of Epsom and Ewell is most heavily constrained, with a large part of the borough intersecting with Epsom and Ashted Commons SSSI, locally important components of Epsom Common or Horton Country Park (extensive parts of both have SNCI and/or LNR designation). In addition, the northern part of the borough intersects with locally important Hogsmill LNR, whilst a small SSSI – Stones Road Pond SSSI – is located in the centre of the borough.
- 9.4.2 In terms of **priority habitats**, whilst these are spread throughout the borough, they cover the largest area in the northeast, south, and west of the plan area. There are two large areas of woodpasture and parkland in the northeast and south of the plan area, whilst there is one large area of deciduous woodland in the west. Other priority habitats in the plan area include good quality semi-improved grassland (large area in the south of the plan area), lowland calcareous grassland, and traditional orchard. There are also small areas of ancient woodland spread through the borough.
- 9.4.3 With respect to the spatial strategy, site **SA1 (Hook Road Car Park and SGN Site)** is approximately 270 metres south of Stones Road Pond SSSI, whilst site **SA4 (Ashley Centre)** is 650 metres east of Epsom and Ashted Commons SSSI. Given that these sites are within the existing built-up area, redevelopment is unlikely to have a significant impact on these designated sites for biodiversity. Site SA4 (Ashley Centre) is also adjacent to Mounthill Gardens, which comprises some priority woodland habitat.
- 9.4.4 The **urban LAA sites**, which form part of the spatial strategy, are concentrated in the centre and north of the borough. Several of the urban LAA sites in the northwest of the borough are located near Horton Country Park LNR/SNCI and Hogsmill LNR, whilst in the central western part of the borough several urban LAA sites are located near Epsom and Ashted Commons SSSI/ Epsom Common LNR. However, due to the small scale of these sites, there are unlikely to be significant biodiversity concerns.
- 9.4.5 In terms of priority habitats, whilst some of the urban LAA sites border priority habitats, none of them intersect with these habitats. However, the construction phase of development could cause disturbance.
- 9.4.6 To the west of Epsom Town Centre is site **SA5 (Land at West Park Hospital)**, which consists of two sites: the north and south parcels. The north parcel is located 15 metres southwest of Horton Country Park LNR/SNCI, whilst the south parcel is located 45 metres north of Epsom and Ashted Commons SSSI. In addition, the north parcel is adjacent to an area of deciduous woodland to the northeast, whilst approximately half of the south parcel contains deciduous woodland. On this basis, biodiversity is considered a significant constraint to growth in this area, and will require further detailed consideration.
- 9.4.7 To the northwest of Epsom Town Centre are sites **SA6 (Horton Farm)** and **SA9 (Hook Road Arena)**, which are adjacent to Horton Country Park LNR/SNCI to the northwest. In addition, the northeast boundary of Horton Farm is adjacent to a strip of deciduous woodland, and within Hook Road Arena is a mature historic hedgerow with a blanket TPO in place. On this basis, biodiversity is a constraint, but as larger sites there will be excellent potential to design-in high quality green infrastructure to reduce concerns and ensure that development leads to a suitable biodiversity net gain.
- 9.4.8 To the northeast of Epsom Town Centre is site **SA8 (Ewell East Station)**. The key issue here is adjacent Priests Hill Nature Reserve SNCI, but there should be good potential to deliver new greenspace to buffer the SNCI (also a public bridleways), and the effect could be to deliver an enhancement to the functioning of the SNCI (mindful that the site is currently used for sports pitches).

Commentary on thematic policies

- 9.4.9 Several policies are supportive of biodiversity objectives, including, but not limited to, policies **DM11** (Trees, Woodlands and Hedgerows), **S17** (Green Infrastructure), and **DM15** (Open Space, Sport and Recreation). However, the policy of overriding importance is Policy **S14** (Biodiversity), which includes a focus on designated sites, priority habitats and species, Biodiversity Opportunity Areas and other land that contributes to the integrity of linkages between designated sites and priority habitats. The policy sets out that development must provide a minimum of **10% biodiversity net gain**, which is the statutory minimum approach under the Environment Act. The Surrey Wildlife Trust strongly advocates for requiring 20% biodiversity net gain, and several emerging local plans in Surrey are proposing to set this as a requirement, for example Guildford (Local Plan Part 2) and Mole Valley.

Conclusion on the draft plan

- 9.4.10 In conclusion, as per the discussion in Section 6 of the report, **neutral effects** are predicted. Most of the proposed Green Belt allocations are subject to a degree of constraint, but there will be good potential to avoid / mitigate effects, including through masterplanning and delivery of targeted enhancements. The proposal is to require 10% biodiversity net gain, which is something that might be revisited subsequent to the consultation, albeit within the constraints of whole plan viability, and in the knowledge that setting a higher requirement might necessitate trading-off against competing policy objectives.

9.5 Climate change adaptation

Commentary on the spatial strategy

- 9.5.1 A focus of climate change adaptation in the context of Epsom and Ewell is fluvial and surface water flood risk. A relatively small proportion of the borough is susceptible to fluvial flooding, with the extents of Flood Zones 2 and 3 being largely confined to the areas adjoining the Hogsmill River and its tributaries. However, the urbanised areas, steep topography and potential rainfall runoff from the Epsom Downs introduces a relatively high susceptibility to surface water flood risk in parts of the borough.
- 9.5.2 With regard to the sites in **Epsom Town Centre**, whilst they are within Flood Zone 1, all of the sites contain varying areas at low, medium or high risk of surface water flooding. The worst effected sites are SA1 (Hook Road Car Park and SGN Site) and the westmost site of site SA2 (Town Hall, Hope Lodge & Epsom Clinic). However, it could potentially be the case that redevelopment leads to an opportunity for betterment, relative to the baseline situation, via high quality Sustainable Drainage Systems (SuDS).
- 9.5.3 Site **SA6 (Horton Farm)** is associated with a significant area of surface water flood risk; however, the emerging proposal is to leave this land undeveloped as open greenspace, including with a view to buffering the adjacent cemetery.
- 9.5.4 Finally, with regards to **SA8 (Ewell East Station)**, a very small area near the northeast boundary of the site is within Flood Zone 3. However, as this part of the site is near its boundary, it is unlikely to be developed. Surface water flood risk is very low across the site.

Commentary on thematic policies

- 9.5.5 The EEBC Climate Change Study, which supports the new Local Plan, highlights that the main concerns with regard to climate change adaptation are the predicted increase in temperatures, a greater frequency of heatwaves, a decrease in summer rainfall, and an increase in winter rainfall. The Study recommends policy wording for the new Local Plan, with a focus on the themes of flood risk and drainage, green and blue infrastructure, health and wellbeing, and adaptation in sustainable design.
- 9.5.6 Several policies are broadly supportive of climate change adaptation, including, but not limited to, policies **S5** (Climate Change and Mitigation), **S15** (Flood Risk and Sustainable Drainage), **S17** (Green Infrastructure) and **DM15** (Open Space, Sport and Recreation). No policies can be identified that give rise to a significant tension. With regards to Policy S15, the policy deals not only with fluvial and surface water flood risk, but also groundwater flood risk, although it is more difficult to reach strong conclusions regarding the extent to which groundwater flood risk is a constraint to development.

Conclusion on the draft plan

- 9.5.7 In conclusion, as per the discussion in Section 6 of the report, **neutral effects** are predicted. The spatial strategy, to a large extent, avoids parts of the borough at greatest risk of fluvial and surface water flooding, and the wider policy framework seeks to minimise flood risk, including by promoting the use of SuDS. However, there will be a need for some further consideration of flood risk within development sites, including Horton Farm and several sites in the urban area.
- 9.5.8 Overheating risk is another important climate change adaptation / resilience consideration. In this respect, there is perhaps broadly support for the 'balanced' nature of the proposed spatial strategy; specifically, the proposal to avoid undue high-density development the urban area and also support some greenfield development. Development of greenfield sites can contribute to the urban heat island effect; however, on the other hand, greenfield sites provide an opportunity to design-in high quality green infrastructure, including with a view to ensuring shading and good access to greenspace during heatwaves, which is a particularly important consideration for those without access to a garden.

9.6 Climate change mitigation

Commentary on the spatial strategy

- 9.6.1 There is clear support for the proposed focus of growth within **Epsom town centre** and the wider urban area from a perspective of seeking to minimise per capita greenhouse gas emissions from transport. However, with regards to sites in the **wider urban area**, there is a need to recognise that some are in locations with lower accessibility and transport connectivity.
- 9.6.2 The two sites that comprise site **SA5 (Land at West Park Hospital)**, this is not a more accessible part of the borough, with no nearby local centre, shopping parade or primary school; however, Epsom town centre is in relative proximity, and there is also a bus route serving this part of the hospitals cluster.
- 9.6.3 Focusing on **built environment greenhouse gas emissions**, as per the discussion in Section 6, and all other things being equal, there can be support for larger strategic sites over-and-above smaller sites. In this light, there is a degree of support for site **SA6 (Horton Farm)**; however, there is a need for further work to confirm what if any decarbonisation focused interventions can be supported here over-and-above what could be supported at any other site (or, at least, any other greenfield site).
- 9.6.4 With respect to the other Green Belt sites, site **SA8 (Ewell East Station)**, whilst smaller in scale, performs well from a climate change mitigation / decarbonisation perspective as it is located adjacent to Ewell East Station. It is also within walking distance of the Ewell local centre and bus services along the A24.

Commentary on thematic policies

- 9.6.5 The EEBC Climate Change Study, which supports the new Local Plan, highlights that the two main contributors to greenhouse gas emissions in Epsom and Ewell are heating and power (particularly the use of gas and electricity) and transport (particularly the use of passenger and light goods vehicles). The Study recommends policy wording for the new Local Plan, with a focus on the themes of carbon reduction, decentralised energy from renewable/ low carbon sources, energy efficiency, minimising waste/ circular economy, sustainable design standards, and transport.
- 9.6.6 A primary focus for this SA topic is policy **S5 (Climate Change and Mitigation)**. In particular, the policy sets out that new greenfield development should achieve greenhouse gas emissions standards that go beyond the requirements of Building Regulations (which are in the process of being tightened to a Future Homes Standard). The potential to set policy in this regard has recently been discussed in detail within the [Inspector's Report](#) for the Cornwall Climate Change DPD (January 2023).
- 9.6.7 Also of relevance is policy **S12 (Design)**, which outlines that the design of all development must maximise opportunities for integrating passive design principles, including orientation, glazing and shading with regard to the winter and summer sun and natural ventilation. Other relevant policies include policies **DM11 (Trees, Woodlands and Hedgerows)**, **S17 (Green Infrastructure)** and **S18 (Transport)**.

Conclusion on the draft plan

- 9.6.8 In conclusion, as per most local plans, there can be some confidence that the plan will lead to an improvement on the baseline, with respect to per capita greenhouse gas emissions. However, there is a degree of uncertainty in the Epsom and Ewell context, as the baseline ('no plan') scenario might involve an additional emphasis on housing growth in the urban area (on the assumption that the Green Belt would be protected, even under situations whereby there is a presumption in favour of sustainable development).
- 9.6.9 Regardless, a key question is in respect of whether the extent of the improvement is *enough*, given the scale of the decarbonisation / net zero challenge, with the NPPF discussing the need to "*shape places in ways that contribute to radical reductions in... emissions.*"
- 9.6.10 Focusing on emissions from the built environment, it is noted that the proposal is to require that greenfield schemes exceed the emissions requirements of Building Regulations, which is strongly supported. However, there is also a need to realise inherent locational opportunities through spatial strategy and site selection. The discussion in Section 6 does not serve to highlight a reasonable alternative strategy that performs better in this respect, but there remains little certainty that decarbonisation opportunities are set to be *fully* realised. Horton Farm is obviously a key site, and so it will be important to undertake further work to establish what can be achieved. Equally, high density development within the town centre could represent a once in 100 years opportunity to deliver decarbonisation focused infrastructure, potentially in the form of one or more heat networks. On balance, **neutral effects** are predicted.

9.7 Communities and health

Commentary on the spatial strategy

- 9.7.1 This is an opportunity to discuss matters over-and-above the key matter of accessibility to community infrastructure, which is a focus of discussion above.
- 9.7.2 With regards to Green Belt sites **SA6 (Horton Farm)** and **SA9 (Hook Road Arena)**, the view is that there is a general opportunity to contribute to place-making to the northwest and west of Epsom, which is where recent housing growth has been focused, through the redevelopment of the former hospital sites. In particular, development of Horton Farm may provide an opportunity to better-connect the former hospital sites to Epsom town centre, with potential to act as a central hub for surrounding communities. Hook Road Arena will deliver a new sports hub and, whilst further work is needed to confirm what Horton Farm will deliver and so 'bring' to the local area, there can be confidence of a high-quality development that achieves 'planning gain'. As part of this, there will be a clear need to deliver extensive green infrastructure and, related to this, it is expected that the scheme will be comprehensive in the sense of 'completing' the expansion of Epsom in this direction (given Horton Country Park to the west). A final consideration, in respect of these sites to the northwest of Epsom, is that this part of the borough is associated with a degree of relative deprivation, at least in comparison to the rest of the borough (which is overall affluent), serving to emphasise the need to realise opportunities for wider place-making and planning gain.
- 9.7.3 Site **SA8 (Ewell East Station)**, whilst smaller in scale and unlikely to deliver anything beyond residential development, is located closest to the existing centres of the borough. In this respect, the site should integrate well with the existing community in this location, and residents will be able to benefit from existing community infrastructure here. It is also set to deliver some local retail provision to meet an existing need.

Commentary on thematic policies

- 9.7.4 A key policy in relation to this SA topic is **DM13** (Community and Cultural Facilities), which supports the safeguarding of existing facilities where possible, and the delivery of additional facilities that meet the borough's needs. Also of importance is Policy **DM14** (Education Infrastructure), which supports investment in existing educational infrastructure to ensure facilities continue to support changing needs and demands. Finally, Policy **DM15** (Open Space, Sport and Recreation) is in place to ensure that the range and quality of open space, sport and recreation provision is maintained and improved where needs are identified, to ensure it meets the needs of the communities they serve.
- 9.7.5 Other relevant policies include **S16** (Infrastructure Delivery) and **S17** (Green Infrastructure). The latter is particularly important as green infrastructure, including open space, can include formal/ informal recreational space, whilst working to connect communities across the borough.

Conclusion on the draft plan

- 9.7.6 In conclusion, **moderate or uncertain positive effects** are predicted, having taken account of the merits of proposed spatial strategy / package of proposed allocations (as discussed in Section 6) alongside the proposed suite of thematic policies. There is a particular opportunity to complete the growth of the Epsom urban area to the west, in the vicinity of the hospital cluster, and support place-making in this area; however further work might be necessary to better understand the range of issues and opportunities.

9.8 Economy and employment

Commentary on the spatial strategy

- 9.8.1 Informed by the Housing and Economic Development Needs Assessment (HEDNA, 2022), Policy **S1 (Spatial Strategy)** outlines that employment needs (office, light industrial, industrial and warehousing) will be met through the intensification of existing strategic employment sites and the delivery of additional employment floorspace that is compatible with residential use in Epsom Town Centre. At Horton Farm it could be that further masterplanning work serves to identify an opportunity to deliver a mixed use community hub, perhaps to include some office or flexible employment space.
- 9.8.2 Also, with regards to broad strategy, there is support for the proposed approach of supporting a boost to development densities in the urban area and a significant element of Green Belt release. New homes are needed in order to support the local economy, recognising the needs of businesses in terms of access to a suitably skilled local workforce. House prices and lack of specific housing types and tenures, including

family and affordable housing, can be a major issue for the effective functioning of local economies. Also, there is a need to consider the importance of suitable housing in terms of supporting productive home working and individual productivity more generally.

Commentary on thematic policies

- 9.8.3 In terms of retail, Policy **S10** (Retail Hierarchy and Network) outlines the Council's 'town centre first' approach to proposals for retail, leisure and other main town centre uses. The policy sets out a retail hierarchy, which places Epsom Town Centre at the top, followed by Ewell Village and Stoneleigh Centre, and neighbourhood parades at the bottom. This will ensure that new development supports the vitality of the town centre/ local centres, whilst being located in the most sustainable locations.
- 9.8.4 Adding to the above, Policy **DM3** (Primary Shopping Areas and Retail Frontages) identifies where the Council considers Primary Shopping Areas and Retail Frontages should remain. The policy supports development proposals at ground floor level for Class E uses that generate footfall and support/ enhance the vitality and viability of the Primary Shopping Areas and Retail Frontages.
- 9.8.5 Policy **DM4** (Edge of Centre or Out of Centre Proposals) seeks to protect the viability and vitality of Town and Local Centres by ensuring that they are not undermined by competing uses being located elsewhere. Meanwhile, policy **DM5** (Neighbourhood Parades and Isolated Shops) seeks to protect and reinforce the role of neighbourhood parades and isolated shops, which help to support sustainable communities. The policy supports development proposals within neighbourhood parades that are appropriate in scale and function, maintain/ enhance the vitality and viability of the parade, and, if ground floor level, provide active frontages and contribute to a range of uses.
- 9.8.6 Of relevance to Policy S1 (Spatial Strategy), as discussed above, Policy **S11** (Economic Development) designates Kiln Lane and Longmead Industrial Estates as Strategic Employment Sites, to be afforded the highest protection and safeguarding for Employment Generating Uses. The policy also seeks to protect other employment sites, as well as creative and cultural venues, facilities and uses.
- 9.8.7 Finally, Policy **DM16** (Digital Infrastructure and Communications), which highlights the importance of providing new development with the most up to date digital connections. In doing so, this policy supports a strong local economy by facilitating working from home, which has become increasingly common since the onset of the Covid-19 pandemic. Other relevant policies include DM6 (Equestrian and Horse Racing Facilities) and DM7 (Visitor Accommodation).

Conclusion on the draft plan

- 9.8.8 In conclusion, **moderate or uncertain positive effects** are predicted for this SA topic. The local plan sets out to deliver much needed local housing, including family housing and affordable housing, to the benefit of local businesses and the achievement of local economic objectives. Furthermore, the proposed policy framework seeks to protect existing employment land, which is a key issue locally.

9.9 Historic environment

Commentary on the spatial strategy

- 9.9.1 To begin with, it is noted that higher density development in the urban area, including Epsom Town Centre, which is a feature of the spatial strategy, gives rise to significant tensions with historic environment objectives. Proposed allocation **SA4 (Ashley Centre)** is particularly constrained, containing four grade II listed buildings, bordering six grade II listed buildings and three grade II* listed buildings, and sharing three boundaries with Epsom Town Centre Conservation Area, which appears within Historic England's Heritage at Risk Register. However, on the other hand, higher densities in the urban area serves to minimise pressure on the Green Belt in Epsom and Ewell, where historic environment constraint is quite widespread and/or on locations outside of the borough, within a constrained sub-region, that might feasibly come under pressure to provide for unmet housing need.
- 9.9.2 A second matter for consideration is proposed allocation **SA5 (Land at West Park Hospital)**. This would involve redevelopment of underused NHS buildings/ land within and adjacent to the West Park component of the Hospitals Cluster Conservation Area, hence there will be a clear need to undertake further work, in collaboration with Historic England. The aim might be for 'heritage-led' redevelopment that learns lessons from recent good practice / experiences elsewhere in the former hospitals cluster.

- 9.9.3 Green Belt site **SA6 (Horton Farm)** relates closely to *three* components of the Hospitals Cluster Conservation Area. Specifically, 60 metres east of the site, between Horton Farm and Hook Road Arena, is St Ebba's Conservation Area, which contains a cluster of four grade II listed buildings; 20 metres west of the site is Long Grove Conservation Area; and 120 metres southwest of the site is Horton Conservation Area (which appears on the Heritage at Risk Register). Horton Farm also contains one grade II listed building – 'Horton Farmhouse' – in the southeast corner of the site. However, it is not clear that the land parcel (area of farmland) contributes significantly to appreciation of the conservation area (as a whole; see further discussion below, under 'Landscape'), and there could well be the potential for sympathetic development to complete the 'story' of reimagining the historic hospitals cluster. Much depends on the scale of growth (possibly <1,500 homes) and the detailed approach that is taken to masterplanning and design, and there would be a clear need to work closely with Historic England.
- 9.9.4 With respect to site **SA9 (Hook Road Arena)**, one grade II listed building – 'The Corner House' – is located 80 metres northeast of the site on the B2200 (Chessington Road). Green Belt site **SA8 (well East Station)** is not near any designated heritage assets and therefore relatively unconstrained.

Commentary on thematic policies

- 9.9.5 A main focus for this SA topic is Policy **S13** (Protecting the Historic Environment), which outlines that development proposals will only be permitted where they preserve/ conserve/ enhance the significance of designated/ non-designated heritage assets. The policy also supports the regeneration and reuse of redundant/ under-used historic buildings, especially those at risk. This is supported by Policy **DM8** (Heritage Assets), which deals with conservation areas, listed buildings and other assets.
- 9.9.6 Also of relevance is policy **S12** (Design), which outlines that the design of all development must respect the scale, appearance and location of buildings, spaces and visual amenity of the surrounding area. Other relevant policies include **DM9** (Shopfronts and Signage) and **DM10** (Landscape Character).

Conclusion on the draft plan

- 9.9.7 In conclusion, as per the discussion in Section 6 of the report, **neutral effects** are predicted. The spatial strategy performs well by directing new growth away from the most heavily constrained areas; however, given the widespread nature of historic environment constraint across the borough, the ambition of meeting housing needs as far as possible, and the focus on delivering growth in the most accessible and best-connected locations, the spatial strategy inevitably gives rise to a significant degree of tension with historic environment objectives. Nevertheless, the policy framework does a good job in covering the historic environment, including the protection/ enhancement of heritage assets, and also focuses on the importance of design in delivering sympathetic new development that complements, rather than detracts, from the historic environment. There may be the potential to set further site-specific policy, potentially in collaboration with Historic England, to ensure that negative effects are avoided or minimised.

9.10 Housing

Commentary on the spatial strategy

- 9.10.1 Whilst there is (and has always been) flexibility to set a **housing requirement** below LHN, from a 'housing' perspective there is a clear need to set the housing requirement at LHN if at all possible and, if this is not possible, set the housing requirement at a figure as close as possible to LHN. Affordable housing needs locally serve as a particularly stark reason for seeking to 'close the gap' to LHN, with just 15 affordable homes having been delivered over the two most recent monitoring years, as discussed in Section 5.
- 9.10.2 In this light, there is a clear concern with the proposal to set the housing requirement at 300 dwellings per annum (dpa), which amounts to **52%** of the identified LHN. With regards to affordable housing, it can be anticipated that perhaps in the region of 100 affordable homes will be delivered per annum, which is contrast to a total need figure of 652 per annum discussed within the Housing and Economic Development Needs Assessment (HEDNA, 2022). The true affordable housing need figure may be lower (see discussion in Section 13 of the HEDNA), but need is undoubtedly acute.
- 9.10.3 However, it is recognised that this decision to set the housing requirement significantly below LHN has been taken on balance, in light of wide-ranging competing objectives, informed by the appraisal of reasonable alternative growth scenarios presented in Section 6.

- 9.10.4 On a more positive note, the proposed “buffer for non-deliver” (or “supply buffer”) of 489 homes is supported, from a housing perspective, as there are inevitably delivery issues at the planning application stage. Also, it is important to recall that a number of the urban sites that contribute to the identified housing supply are currently associated with uncertain availability (although, on the other hand, there is a high likelihood of significant additional urban supply being identified through the current consultation).
- 9.10.5 Also, there is support for allocation of four greenfield sites, which will be well suited to delivering a **good housing mix**, including a mix of types (including family housing), tenures (i.e. a good mix of affordable housing tenures, mindful of extremely high needs) and specialist housing, including for older people (although urban sites can also be well suited to some types of older persons housing, given good accessibility to the town centre or a local centre). Brownfield sites can tend to face viability challenges (at least relative to greenfield sites) that lead to challenges in respect of delivering a good housing mix.
- 9.10.6 A further important consideration is providing for **Gypsy and Traveller accommodation needs**. The Council has recently completed an accommodation assessment, which finds that there is a need for 10 pitches for those who meet the ‘planning definition’ set out within the Government’s Planning Policy for Traveller Sites (PPTS, 2015), which essentially relates to ongoing active travelling, or otherwise a full ‘cultural’ need for 18 pitches. Recent legal precedent lends weight to providing for the full ‘cultural’ need (in order to avoid discrimination against those who cannot travel), which is at a level (18 pitches) that could prove challenging to meet in the local context. In this light, there is strong support for **SA6 (Horton Farm)**, as its scale (also its configuration, with a plethora of access options) means that it is very well suited to providing for Gypsy and Traveller pitches (see further discussion in Section 6).

Commentary on thematic policies

- 9.10.7 A primary consideration is Policy **S7** (Affordable Housing), which proposes an (arguably) suitably ambitious approach, informed by the emerging work on whole plan viability. Specifically, the policy outlines a requirement for 30% affordable housing on brownfield sites, and 40% affordable housing on greenfield sites. Of this affordable housing, 25% should be provided as First Homes (with a minimum discount of 30% below market prices), and the mix of tenure for the remaining 75% must reflect local needs. To ensure social inclusion, affordable housing should be dispersed through the site.
- 9.10.8 Policy **DM1** (Residential Standards) is another policy that requires careful consideration from a whole plan viability perspective, i.e. there is a need to consider the cost implications of requirements, mindful that additional costs will have knock-on implications for the achievement of other policy objectives. The policy sets out requirements for internal and outdoor space, and importantly requires that a minimum of 10% of homes meet Building Regulations wheelchair adaptable dwellings standard, and a minimum of 20% of new affordable homes meet Building Regulations accessible compliance standard.
- 9.10.9 With respect to meeting the needs of all people within the borough, Policy **S8** (Specialist Housing) seeks to ensure that specialist accommodation, such as homes for older people, people with disabilities, or homes for other specific groups, is permitted where there is an identified need for it, in the most accessible sites, and an appropriate tenure mix is provided. Larger-scale developments (such as Horton Farm) will be expected to consider the incorporation of specially designed housing/ specialist accommodation.
- 9.10.10 Other relevant policies include policies **DM2** (Loss of Housing), which seeks to prevent the loss of housing, and **S9** (Gypsies, Travellers and Travelling Showpeople), which seeks to safeguard existing supply and ensure any new supply is appropriate in terms of scale, location, access, and on-site facilities.

Conclusion on the draft plan

- 9.10.11 In conclusion, there is a clear need to predict **significant negative effects**, as there are reasonable alternative approaches that might be taken that would involve setting the local plan housing requirement at a figure closer to local housing need (LHN) such that the local plan exports less unmet need to a constrained sub-region where unmet need is already a major problem. However, it is recognised that this decision has been taken on balance, weighing-up competing objectives, as discussed above. Also, it is recognised that wide-ranging policy is proposed aimed at supporting the achievement of housing-related objectives; and the proposal to go some way towards meeting the accommodation needs of Gypsies and Travellers. In respect of housing-related thematic policy, a key point to note is the proposal to prioritise delivery of affordable housing, with the proposal to require 40% affordable housing on the four greenfield allocations. Given the scale of affordable housing needs there could be a need to consider the possibility of setting a still higher requirement, albeit this would need to be within the constraints of development viability, and in recognition of the inevitable need to trade-off against other important policy objectives.

9.11 Land and soils

Commentary on the spatial strategy

- 9.11.1 As discussed in Section 6, a foremost consideration here is the need to avoid the loss of agricultural land classed as ‘best and most versatile’ (BMV). There is little certainty regarding whether any of the proposed greenfield allocations comprise BMV quality land, and there is also a need to question whether the land parcels in question have any realistic potential to be put to productive agricultural use. The available evidence serves to suggest that it is the eastern-most of the proposed greenfield allocations – **SA8 (Ewell East Station)** – is most likely to comprise BMV land, but the land is currently used for sports pitches. It appears to be only **SA6 (Horton Farm)** that is currently in productive agricultural use, there is quite low likelihood of the land comprising BMV agricultural land (surveying work of Horton Farm and other Green Belt site options could be appropriate prior to plan finalisation).
- 9.11.2 Another consideration for local plans is often the need to avoid minerals [safeguarding areas](#), as far as possible; however this does not appear to be a significant issue in the Epsom and Ewell context.

Commentary on thematic policies

- 9.11.3 Regarding contaminated land, Policy **DM12** (Pollution and Contamination) only permits development proposals on potentially contaminated land where it can be made safe for the proposed use; it makes provision for remediation measures; and it takes account of ground conditions and land stability.

Conclusion on the draft plan

- 9.11.4 In conclusion, broadly **neutral effects** are predicted, largely reflecting a view that the plan is not likely to directly lead to a significant loss of BMV agricultural land. However, there is also a need to consider that unmet housing need generated by the plan may need to be provided for elsewhere within the sub-region, and it could be that locations that come under pressure for growth are associated with extensive BMV agricultural land.

9.12 Landscape

Commentary on the spatial strategy

- 9.12.1 A primary consideration clearly relates to the four proposed greenfield allocations:
- **SA6 (Horton Farm)** – historic roads/ lanes surround the site; a sizable Tree Preservation Order (TPO) area is adjacent to the site; widespread views into the site from the adjacent roads and associated pedestrian/ cycle paths (but these are filtered views through hedgerows); the land rises to the west (although it is not clear that there are extensive views into or across the site that are likely to be of particularly high value); and good containment / low risk of future development creep/ sprawl.
 - **SA9 (Hook Road Arena)** – is very well-contained in landscape terms, given surrounding built form, and mindful that the northern part of the site is proposed for sports pitches.
 - **SA8 (Ewell East Station)** –there is built form on two sides, but there is an adjacent bridleway, which is associated with slightly raised ground, and which is likely a popular route for accessing Priests Hill.

Commentary on thematic policies

- 9.12.2 Policy **DM10** (Landscape Character) seeks to protect the borough's landscape by ensuring that development proposals are sensitively designed to complement and enhance the surrounding landscape. Development proposals must consider impacts on landscape features, views, landform, and landscape patterns. For larger development proposals (such as Horton Farm), developers must submit a Landscape and Visual Impact Assessment (LVIA) to consider the visual impact of the proposal.
- 9.12.3 Also of relevance is Policy **DM11** (Trees, Woodlands and Hedgerows), which seeks to prevent the loss of, or damage to, trees, woodlands and hedgerows that contribute to the character/ amenities of an area. The policy also outlines that development proposals must incorporate tree lined streets/ new trees and incorporate a long-term management plan for planting schemes.
- 9.12.4 Policy **S17** (Green Infrastructure) outlines support for development that protects and enhances existing, and/ or delivers new, green infrastructure within the borough.

Conclusion on the draft plan

- 9.12.5 In **conclusion**, the proposed greenfield (Green Belt) allocations are all associated with a degree of landscape sensitivity; however, minimising landscape impacts has clearly been a focus of the spatial strategy / site selection process. Also, there is a need to recall that lower growth in Epsom and Ewell would (presumably) lead to increased pressure for growth elsewhere within a constrained sub-region (see further discussion below, within Section 9.15). On balance, broadly **neutral effects** are predicted. It will be important to ensure that further work is in respect of masterplanning, landscaping and design of the proposed greenfield allocations, with a view to minimising landscape impacts.

9.13 Transport

Commentary on the spatial strategy

- 9.13.1 As discussed in Section 6, avoiding **unmet need**, as far as possible, is crucially important from a transport planning perspective. In this respect, the proposal to set the housing requirement significantly below LHN is obviously not ideal; however, on the other hand, it is recognised that there are clear drawbacks to higher growth strategy options (including from a transport perspective), as discussed in Section 6.
- 9.13.2 Also discussed in detail in Sections 5 and 6, transport connectivity has clearly been a key factor influencing the spatial strategy / site selection process. With regards to the proposed Green Belt allocations: **Hook Road Arena** performs very well, given nearby Ewell West station; **Horton Farm** has reasonable train and bus connectivity, very good cycle connectivity, including to existing local centres (there are offroad routes on nearly all sides of the site), very good road access (subject to further work), and there is a clear opportunity to better-connect the somewhat isolated existing community of Long Grove; and **Land adj. Ewell East Station** has excellent train connectivity and also good access to bus services along the A24.

Commentary on thematic policies

- 9.13.3 Policy **S18 (Transport)** of the draft plan seeks to ensure the delivery of a sustainable transport network in the borough. The policy sets out that this will be achieved by ensuring that new development prioritises pedestrians and cyclists, provides opportunities to establish car clubs and cycle rental schemes, and provides facilities situated in convenient and easy to use locations that will increase the uptake of electric/ zero emission vehicles. In addition, car free development will be encouraged in appropriate locations and when supported by evidence demonstrating that proposals would not lead to parking stress.

Conclusion on the draft plan

- 9.13.4 In **conclusion**, **moderate or uncertain positive effects** are predicted. The spatial strategy focuses growth on Epsom Town Centre, the wider urban area (including most accessible / better connected parts) and Green Belt sites that perform well from a transport perspective. The policy framework supports the spatial strategy by ensuring that new development prioritises sustainable modes of transport, including walking, cycling and public transport. However, there may be a need for further work, given the critical importance of supporting modal shift away from the private car and delivering upgrades to transport infrastructure, ideally to the point that the plan delivers a 'planning gain' over-and-above the baseline.

9.14 Water

Commentary on the spatial strategy

- 9.14.1 With regards to the spatial strategy, there is little potential to comment further, over-and-above the discussion presented in Section 6. There are no clear reasons to suggest any significant concerns, in respect of water resources or water quality, but there is a need to gather further evidence.

Commentary on thematic policies

- 9.14.2 Policy **DM1 (Residential Standards)** is the primary policy of note. It requires that new homes must achieve a water efficiency standard of no more than 110 litres per person per day, unless it can be proved that this is not feasible/ would make the scheme unviable.

Conclusion on the draft plan

- 9.14.3 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 company.

9.15 Overall conclusions

9.15.1 The appraisal conclusion is as follows:

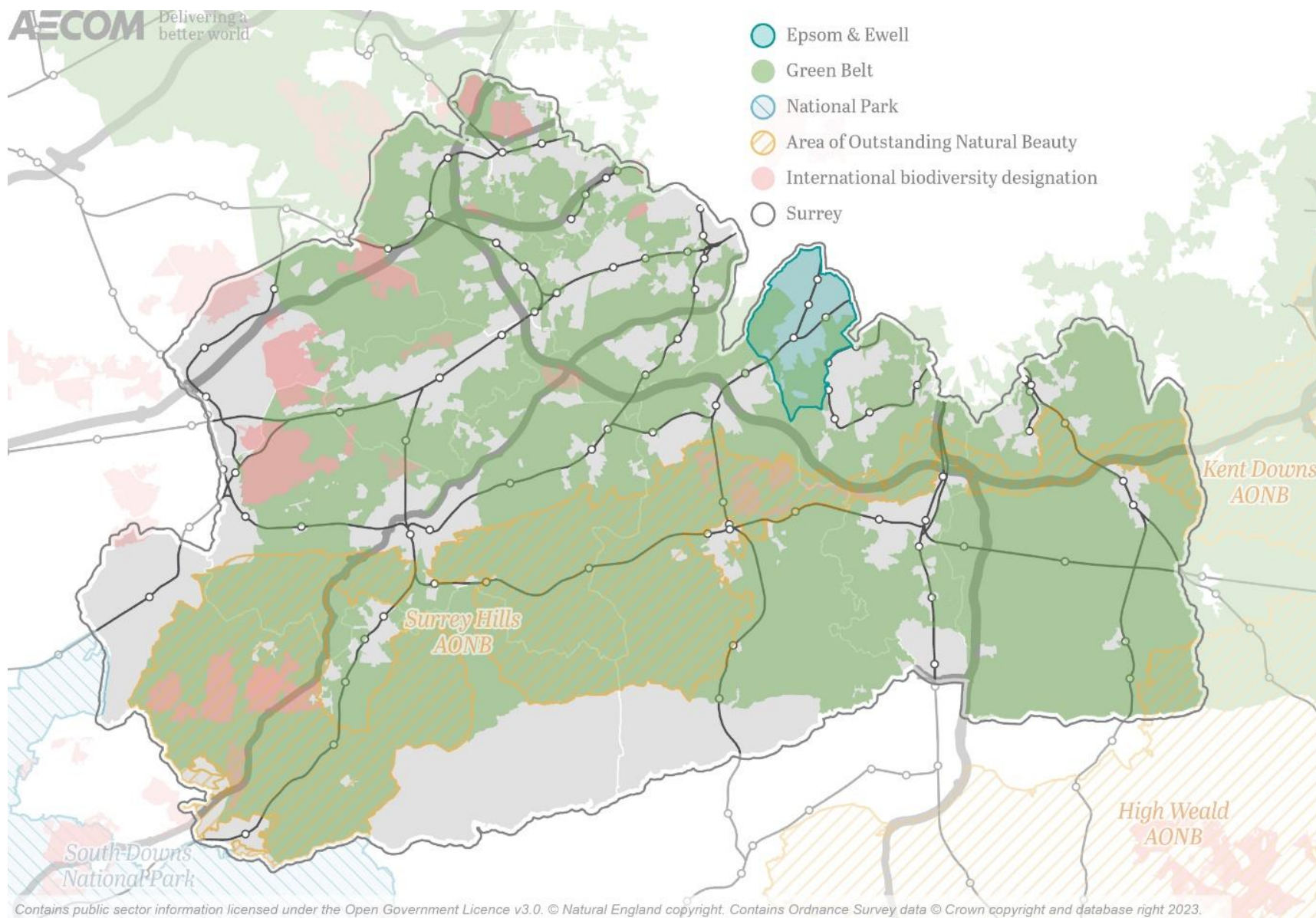
- **Significant positive effects** – the appraisal does not predict any significant positive effects; however, it is anticipated that it will be possible to predict significant positive effects prior to plan finalisation, in light of further work (including in response to new evidence gathered through the current consultation). One issue is that the 'baseline' (no plan) scenario is likely one whereby there continues to be low growth in the borough, because of the protection given to Green Belt under the NPPF. This is in contrast to non-Green Belt authorities, where there is often an urgent need to adopt a local plan to avoid a situation whereby there is problematic unplanned growth under the presumption in favour of sustainable development / tilted balance ('planning by appeal').
- **Moderate or uncertain (MoU) positive effects** – the appraisal of reasonable growth scenario 4 (in Part 1) leads to a prediction of MoU positive effects only in terms of **Accessibility** (because growth will deliver new community infrastructure and support the vitality of existing centres). However, having taken account of DM policy it is possible to also predict MoU positive effects in terms of: **Communities** (because numerous policies are focused on addressing the needs of new and existing communities); **Economy and employment** (because of the policy targeted at protecting existing employment land, which is a key issue locally); and **Transport** (this is another issue that is a focus of wide-ranging policy, and detailed evidence has been prepared to inform the plan, albeit there is also a need for further work, given the critical importance of supporting modal shift away from the private car, and delivering targeted upgrades to transport infrastructure).
- **Neutral effects** – are predicted for **several topics**. In each case there are a range of issues and impacts, but it is difficult to reach a conclusion on whether overall effects will be positive or negative, relative to the baseline (no plan) scenario, and will be of any significance. For example, in respect of Biodiversity, certain allocations do give rise to a degree of risk, but there is a need to recall that the baseline scenario involves a situation whereby there is increased pressure to accommodate unmet housing need within a constrained sub-region.
- With regards to Climate change mitigation, whilst there can be little doubt that the plan will lead to an improvement on the baseline (with respect to per capita greenhouse gas emissions), the question is whether the extent of the improvement is *enough*, given the scale of the net zero challenge, with the NPPF discussing the need to “*shape places in ways that contribute to radical reductions in... emissions.*” It is noted that the proposal is to require that greenfield schemes exceed the emissions requirements of Building Regulations (which are currently being tightened to a 'Future Homes Standard'), which is strongly supported.
- **Moderate or uncertain (MoU) negative effects** – are not predicted under any topic headings. However, in two cases this decision was quite marginal. Firstly, there are clearly arguments to suggest that Landscape impacts will be negative and of some significance, even accounting for the issues that can be envisaged under a baseline (no plan) scenario at the sub-regional scale. It is important to recall that Green Belt is not a landscape designation; however, on the other hand, in the Epsom and Ewell context, parcels of land with high Green Belt value will also often tend to have high landscape value, including given the importance of settlement separation from a perspective of seeking to ensure a strong sense of place. Secondly, with regards to the Historic Environment, a key factor is the proposed allocation of a PDL Green Belt site within a conservation area.
- **Significant negative effects** – must be predicted under the **Housing** topic heading, as there are reasonable alternative approaches that might be taken that would involve setting the local plan housing requirement at a figure closer to local housing need (LHN) such that the local plan exports less unmet need to a constrained sub-region where unmet need is already a major problem. However, it is recognised that this decision has been taken on balance, weighing-up competing objectives, as discussed above. Also, it is recognised that wide-ranging policy is proposed aimed at supporting the achievement of housing-related objectives; and the proposal to go some way towards meeting the accommodation needs of Gypsies and Travellers. In respect of housing-related thematic policy, a key point to note is the proposal to prioritise delivery of affordable housing, with the proposal to require 40% affordable housing on the four greenfield allocations. Given the scale of affordable housing needs there could be a need to consider the possibility of setting a still higher requirement, albeit this would need to be within the constraints of development viability, and in recognition of the inevitable need to trade-off against other important policy objectives, e.g. climate change mitigation / net zero.

- 9.15.2 The issues and tensions with sustainability objectives discussed above will be given further consideration prior to plan finalisation, plus there will also need to be a focus on ensuring the positive effects of the local plan are maximised, i.e. growth related opportunities are fully realised. The draft plan appraisal presented above highlights a number of areas that might need to be a particular focus of further work, which will certainly involve taking close account of responses received through the current consultation, and might also involve further detailed / technical work (which itself might involve further targeted consultation). There will be a clear need to maintain close dialogue with neighbouring local authorities, including Surrey County Council and the GLA, in respect of larger than local issues, including meet housing needs.

Cumulative effects

- 9.15.3 The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen.
- 9.15.4 In practice, this is an opportunity to discuss potential 'larger than local' effects and, for Epsom and Ewell, a key issue is the question of whether, where and when unmet housing need will be provided for.
- 9.15.5 Figure 9.1 shows a selection of key sub-regional issues and constraints that create a challenge in respect of meeting unmet need from Epsom and Ewell.
- N.B. by way of orientation, it is important to note that land beyond the Green Belt within West Surrey is almost entirely urbanised, associated with the A331/ Blackwater Valley, between Camberley and Farnham.
- 9.15.6 Wider environmental challenges include national and local biodiversity designations (e.g. landscapes associated with very high densities of ancient woodland in south Surrey); local landscape designations (including the Area of Great Landscape Value, AGLV, within Surrey, which is an extension of the AONB and currently being reviewed by Natural England with a view to potentially extending the AONB); and the 'water neutrality' constraint that is a major barrier to growth at Crawley, Horsham and other locations in the Sussex North Water Resource Zone.
- 9.15.7 Another factor that could be explored through further mapping / spatial analysis is functional connectivity between Epsom and Ewell and locations that could conceivably provide for unmet need. There is limited firm evidence regarding the extent of housing and economic market areas; however, there are some obvious points for consideration around transport connectivity, which is a key factor influencing housing and economic market areas.
- 9.15.8 In this respect, a key point to note is that Epsom and Ewell links directly to wider Surrey via the A24, which is not shown on the map below, because it is not part of the Strategic Road Network managed by National Highways. It is also a rail corridor, and the trainline is shown on the map, linking Epsom to Leatherhead, Dorking and Horsham. There is little or no reason to consider this a growth corridor. Otherwise, the borough is near equidistant between two more strategic road and rail corridors, namely the A3 corridor to Guildford and beyond (East Hampshire); and the A23 corridor to Gatwick, Crawley and Brighton.
- 9.15.9 Finally, there is a need to consider locations other than Epsom and Ewell where unmet housing need is an existing or likely / potential future issue, and locations where plan-making work to date serves to evidence a conclusion that there is little or no realistic potential to provide for unmet needs. It is beyond the scope of this brief note to present a detailed review, but the issues are significant.
- 9.15.10 For example, the emerging local plans for neighbouring Mole Valley and Elmbridge are both likely to generate significant unmet need. With regards to neighbouring and nearby London boroughs, it is clearly the case that the London Plan targets are challenging, plus there is the question of unmet need generated by the London Plan, such that there is little or no potential to provide for unmet need from Epsom and Ewell. LB Kingston is currently [consulting](#) on a draft London Plan that proposes to meet the London Plan housing target via a major step change in the rate of housing delivery locally within the urban area, and within Kingston in particular. Croydon is another not-so-distant [London Plan Opportunity Area](#), but the local plan published for consultation in early 2022 suggested limited opportunity over-and-above that which is committed. The local plan also proposed a notable growth area along the A23 in Croydon (Purley Way), but there are challenges to growth here, as discussed within the [SA Report](#).
- 9.15.11 In summary, Surrey is an obvious key scale at which to deal with unmet need, but there are no clear mechanisms in place, and inherent challenges. Looking beyond Surrey, it is difficult to suggest how, where or when provision might be made for unmet need from Epsom and Ewell.

Figure 9.1: Examples of select sub-regional constraints to providing for Epsom and Ewell's unmet housing need



Part 3: What are the next steps?

10 Plan finalisation

Publication of the Proposed Submission Local Plan

- 10.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the local plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. This will be a version that the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Local Plan will be informed by the findings of this Interim SA Report, responses to the current consultation, further evidence gathering and further appraisal work.
- 10.1.2 The SA Report will be published alongside the Proposed Submission Local Plan. It will provide all the information required by the SEA Regulations 2004.

Submission, examination and adoption

- 10.1.3 Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed 'sound'. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.
- 10.1.4 At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).
- 10.1.5 Once found to be 'sound' the Local Plan will be adopted by the Council. At that time a 'Statement' must be published that sets out certain information including 'the measures decided concerning monitoring'.

11 Monitoring

- 11.1.1 Within the SA Report (N.B. this is not the SA Report, but rather an "Interim" SA Report), the requirement is to present "measures envisaged concerning monitoring".
- 11.1.2 The question of an appropriate monitoring framework will be revisited prior to plan finalisation, but it is suggested that monitoring might cover:
- Biodiversity (the new net gain regime presents an opportunity for innovation); Climate change adaptation (innovative approaches to monitoring flood risk);
 - Climate change mitigation (e.g. the proportion of homes that achieve standards that go beyond the minimum requirements set out in Building Regulations);
 - Employment land requirements (require close monitoring, given evolving regional and national context);
 - Housing (affordable housing delivery is obviously key, and monitoring might disaggregate according to type and tenure of affordable housing delivered; and regular monitoring of the accommodation needs of Gypsies and Travellers, and Travelling Showpeople is also very important);
 - Transport (uptake of 'sustainable transport' modes within new communities, potentially using innovative mobile phone apps, plus monitoring of traffic hotspots); and
 - Water (ongoing consideration should be given to any risk of capacity breaches at Wastewater Treatment Works (WwTWs) and other risks to the status of water courses; issues should be clearly communicated).

Appendix I: Regulatory requirements

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

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

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

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

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

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

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3 in an adjusted form.
c) The environmental characteristics of areas likely to be significantly affected;	
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) were then refined in order to establish an 'SA framework', which is presented within Section 3. With regards to explaining " <i>how... considerations have been taken into account</i> ", Section 7 explains 'reasons for supporting the preferred approach', i.e. how/why the preferred approach is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the local plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 9 presents recommendations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Section 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives (growth scenarios) appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This Interim SA Report is published alongside a draft version of the plan in order to inform consultation and plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This Interim SA Report will be taken into account when finalising the plan for publication (as discussed in Section 10).