

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

SA Scoping Report

Epsom and Ewell Borough Council

July 2022

Quality information

Prepared by	Checked by	Verified by	Approved by
Emma Hazell Graduate Environmental Planner	Mark Fessey Associate Environmental Consultant	Mark Fessey Associate Environmental Consultant	Mark Fessey Associate Environmental Consultant
Laurie Marriott Urban Planner			

Revision History

Revision	Revision date	Details	Name	Position
V1	29 th April 2022	Draft for internal review	Emma Hazell	Graduate Environmental Planner
V2	23 rd May 2022	Consultation version	Emma Hazell	Graduate Environmental Planner
V3	20 th July 2022	Final version following consultation	Emma Hazell	Graduate Environmental Planner

Prepared for:

Epsom and Ewell Borough Council

Prepared by:

AECOM Limited
3rd Floor, Portwall Place
Portwall Lane
Bristol BS1 6NA
United Kingdom

T: +44 117 901 7000
aecom.com

© 2022 AECOM Limited. All Rights Reserved.

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

Table of Contents

1.	Introduction	1
2.	Air quality	8
3.	Biodiversity	14
4.	Climate change adaptation	24
5.	Climate change mitigation.....	31
6.	Communities and health	39
7.	Economy and employment	52
8.	Heritage and the historic environment.....	60
9.	Housing.....	70
10.	Landscape.....	75
11.	Land and Soils.....	84
12.	Transport.....	89
13.	Water	96
14.	Proposed SEA framework and methodologies	102
15.	Next Steps.....	107

1. Introduction

Epsom and Ewell

- 1.1 Covering an area of approximately 34 km², Epsom and Ewell is a local government district with borough status in Surrey. Epsom and Ewell has a population of approximately 81,003 residents according to 2020 estimates. 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 borough, as well as the fastest growing. Epsom town centre is the primary centre of the borough, and the secondary centres are Ewell Village and Stoneleigh Broadway.

Local Plan Context

- 1.2 Epsom and Ewell Borough Council (EEBC) is currently preparing a new Local Plan (hereafter referred to as “the new Local Plan”). The new Local Plan will replace the current Local Plan, which includes the following key documents:
- The Core Strategy (2007)
 - Epsom Town Centre Area Action Plan (2011)
 - Development Management Policies Document (2015)
- 1.3 The new Local Plan, which will cover the period 2022 to 2040, will be the key planning policy document for Epsom and Ewell and will guide decisions on the use and development of land. The council have also commissioned several reports from specialist independent experts to better understand both current and future requirements and how these can be met.
- 1.4 As of the time of writing this report (May 2022), the Council has recently published an updated Local Development Scheme (the timetable for preparing the new local plan).¹ This document sets out that the council are currently gathering evidence to inform a Regulation 18 consultation on a Draft Local Plan to commence in October / November 2022 with consultation on the Submission Local Plan (Regulation 19) scheduled to take place between October and November 2023. Following this, the council will submit the final Local Plan to the independent Planning Inspector who will set the date for the Examination. It is hoped that by Winter 2024 the new Local Plan can be formally adopted as council policy.
- 1.5 Key information relating to the new Local Plan is presented in **Table 1.1** overleaf.

¹ Epsom and Ewell Borough Council (2022): ‘Local development scheme’, [online] available to access via [this link](#)

Table 1.1 Key information relating to the new Local Plan

Name of Responsible Authority	Epsom and Ewell Borough Council (EEBC)
Title of Plan	Epsom and Ewell Local Plan ("the new Local Plan")
Subject	Development Plan
Purpose	<p>The new Local Plan will guide future development and land use within Epsom and Ewell up until 2040.</p> <p>Replacing the adopted Local Plan, the new Local Plan will, alongside neighbourhood plans, comprise the development plan for the borough and will be the primary basis against which planning applications are assessed.</p>
Timescale	2022 to 2040
Area covered by the plan	Epsom and Ewell Borough (see Figure 1.1 overleaf)
Summary of content	<p>The new Local Plan will set out the vision, strategy, and policies to manage growth and development in Epsom and Ewell in the period 2022 to 2040.</p> <p>It will indicate the broad locations in the borough for future housing, employment, retail, leisure, transport, community services and other types of development.</p>
Plan contact point	<p>Ian Mawer, Planning Policy Manager</p> <p>Email: imawer@epsom-ewell.gov.uk</p>

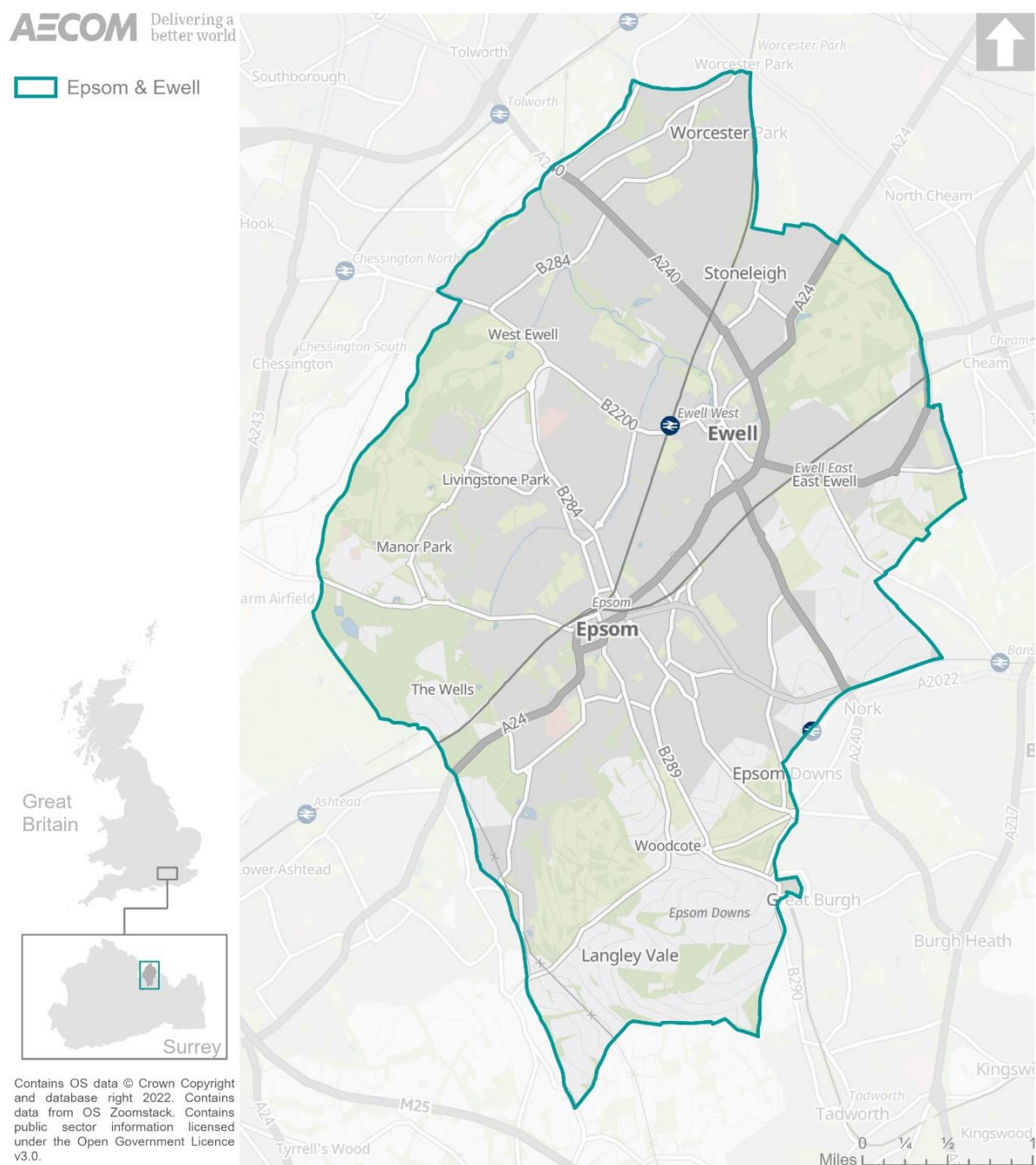


Figure 1.1 Area covered by the new Local Plan

Sustainability Appraisal (SA) explained

- 1.6 AECOM has been commissioned to undertake an independent Sustainability Appraisal (SA) in support of the new Local Plan on behalf of EEBC.
- 1.7 SA considers and communicates the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the new Local Plan's contribution to sustainable development.
- 1.8 SA is undertaken for local plans in England to reflect the requirements of the Planning and Compulsory Purchase Act 2004. This process is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA regulations) which previously transposed into national law the EU Strategic Environmental Assessment (SEA) Directive.² SA also widens the scope of the assessment from focusing on environmental issues to also include social and economic issues.
- 1.9 The National Planning Practice Guidance³ states that a sustainability appraisal's role is:
- "...to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have."*
- 1.10 Two key procedural requirements of the SEA Regulations are that:
1. A report (the 'SA report') is published for consultation alongside the draft plan that presents an appraisal of the draft plan (i.e., discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives; and
 2. When deciding on 'the scope and level of detail of the information' which must be included in the SA report there is a consultation with nationally designated authorities concerned with environmental issues.

This scoping report

- 1.11 This scoping report is concerned with (2) above. It presents a suggested scope for the SA so that the nationally designated authorities (which, in England, are Natural England, the Environment Agency and Historic England) can provide timely comment.

² Directive 2001/42/EC

³ GOV.UK (2020): 'SEA and SA Guidance', [online] available to access [here](#)

Overview of the SA process for the new Local Plan

1.12 The SA process will be designed to inform and influence plan making at key stages of plan development. The stages of the SA process, in conjunction with those of the new Local Plan, are set out below. The current stage (scoping) is therefore the first stage of the SA process, as shown in **Figure 1.2** below.

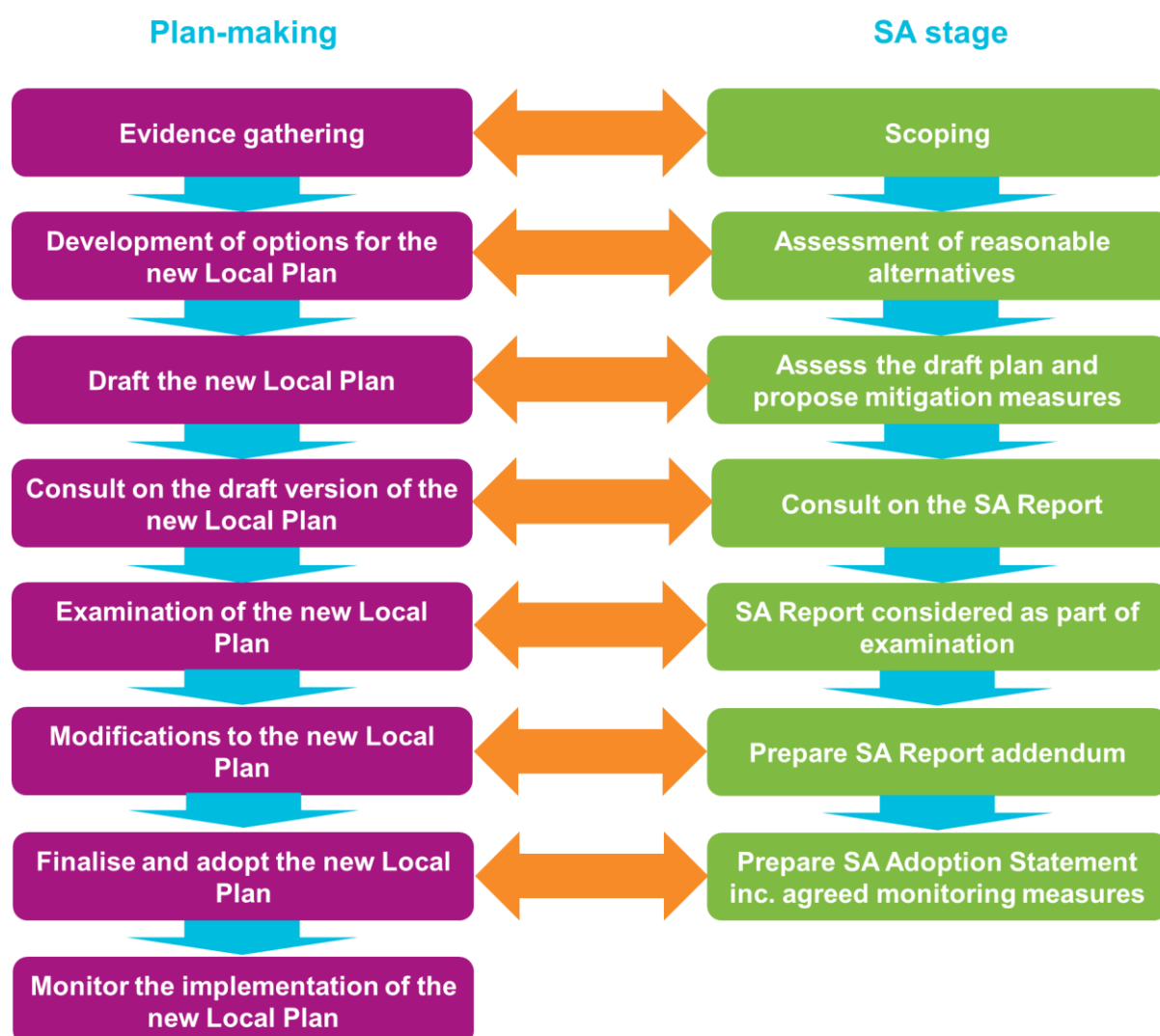


Figure 1.2 Stages of the SA process in conjunction with the development of the new Local Plan

Approach to scoping

1.13 This Scoping Report presents the proposed scope for the SA process. Developing the draft scope for the SA has involved the following steps:

- Defining the broader context for the new Local Plan and associated SA (i.e., international, national, and local policy and commitments), to summarise the regulatory and legislative framework.
- Establishing the baseline for the SA, (i.e., the current and future situation in Epsom and Ewell in the absence of the new Local Plan, to help identify the plan's likely significant effects).

- iii. Identifying particular problems or opportunities ('issues') that should be a particular focus of the SA; and
- iv. Developing a SA framework comprising objectives and appraisal questions based on these issues which can then be used to appraise the new Local Plan and reasonable alternatives.

SA topics

1.14 The outcomes of the scoping elements introduced through steps i. to iv. above have been presented under a series of SA topics, shown in **Table 1.2** below.

Table 1.2 SA topics

SA topic	Elements covered by topic
Air quality	<ul style="list-style-type: none"> • Air pollution sources • Air quality hotspots • Air quality management
Biodiversity	<ul style="list-style-type: none"> • International, national, and local biodiversity designations • Key habitats • Key species • Ecological networks • Geological sites
Climate change adaptation	<ul style="list-style-type: none"> • Flood risk • Climate change resilience
Climate change mitigation	<ul style="list-style-type: none"> • Greenhouse gas emissions • Potential effects of climate change
Communities and health	<ul style="list-style-type: none"> • Population and age structure • Deprivation • Housing quality, mix and affordability • Community facilities • Influences on health and wellbeing
Economy and employment	<ul style="list-style-type: none"> • Current and emerging economic sectors • Employment, education, and skills • Productivity and growth
Heritage and historic environment	<ul style="list-style-type: none"> • Designated and non-designated heritage assets • Setting, special qualities and significance of heritage assets • Locally important heritage assets • Archaeological resources • Historic character of Epsom and Ewell
Housing	<ul style="list-style-type: none"> • Local housing needs • Affordable housing • Specialist and localised needs
Landscape	<ul style="list-style-type: none"> • Designated and non-designated sites and areas • Landscape, townscape and villagescape character • Visual amenity
Land and soils	<ul style="list-style-type: none"> • Soil quality • Agricultural land • Minerals resources

SA topic	Elements covered by topic
Transport	<ul style="list-style-type: none"> • Transportation infrastructure • Traffic flows and congestion • Accessibility and connectivity • Public rights of way
Water	<ul style="list-style-type: none"> • Water availability and quality • Wastewater treatment

1.15 The selected SA topics incorporate the ‘SEA topics’ suggested by Annex I(f) of the SEA Directive.⁴ These were refined to reflect a broad understanding of the anticipated scope of plan effects.

1.16 It is intended that presenting the scoping information under these topics will help enable the reader to easily locate the information of greatest interest to them. Once agreed (i.e., after the current consultation), the suggested scope presented under the eight topics will provide a methodological ‘framework’ for the appraisal of the draft plan and alternatives.

Scoping report structure

1.17 Considering the above, this scoping report has been structured as follows:

- **Chapters 2 to 13** present for each of the SA topics:
 - An overview of the relevant plans, programmes or strategies that are likely to influence the new Local Plan.
 - The current and future baseline.
 - The key sustainability issues that should be a particular focus of the SA for the topic; and
 - The SA framework (comprising objectives and appraisal questions) which it is anticipated will be used to appraise the draft version of the new Local Plan and reasonable alternatives.
- **Chapter 14** subsequently presents an overview of the next steps for the SA process alongside plan development.

⁴ The SEA Directive is ‘of a procedural nature’ (para 9 of the Directive preamble) and does not set out to prescribe particular issues that should and should not be a focus, beyond requiring a focus 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**’ [our emphasis]

2. Air quality

Focus of topic

- Air pollution sources
- Air quality hotspots
- Air quality management

Policy context

2.1 **Table 2.1** below presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key messages emerging from the review are then summarised after the table.

Table 2.1 Plans, policies and strategies

Document title	Year of publication
International	
<u>Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions (integrated pollution prevention and control)</u>	2010
National	
<u>National Planning Policy Framework</u>	2021
<u>The Clean Air Strategy</u>	2019
<u>A Green Future: Our 25 Year Plan to Improve the Environment</u>	2018
<u>UK plan for tackling roadside nitrogen dioxide concentrations</u>	2017
<u>Noise Policy Statement for England (NPSE)</u>	2010
<u>The Environmental Noise (England) Regulations 2006</u>	2006
Local	
<u>Surrey Transport Plan Low Emissions Transport Strategy</u>	2018
<u>Epsom and Ewell Core Strategy</u>	2007
<u>Epsom Town Centre Area Action Plan</u>	2011
<u>Epsom and Ewell Development Management Policies Document</u>	2015
<u>Epsom and Ewell Air Quality Annual Status Report</u>	2021
<u>Further Assessment of Nitrogen Dioxide in Ewell High Street</u>	2010

2.2 The Directive on industrial emissions sets out rules on the prevention and control of pollution caused by industrial activities. It also details the rules designed to prevent or reduce emissions into the air, water, and land. Furthermore, it outlines ways to avert waste generation to achieve a high level of environmental protection.

2.3 Air quality features in Chapter 9 and Chapter 15 of the NPPF. The NPPF states the following:

- Chapter 9: significant development should be focused on locations which are currently, or can be made to be, sustainable. Through limiting the need

to travel and offering a genuine choice of transport modes, congestion and emissions can be decreased and air quality improved.

- Chapter 15: new and existing developments should be prevented from contributing to, being at risk from, or being adversely affected by unacceptable levels of air pollution.
- Chapter 15: planning policies and decisions should comply with relevant limit values or national objectives for pollutants, appropriately considering the presence of Air Quality Management Areas, Clean Air Zones and the cumulative impacts of individual sites. Opportunities to improve air quality or mitigate impacts should be identified, like traffic and travel management and the creation or enhancement of green infrastructure. These opportunities should be considered at the plan-making stage to ensure a strategic approach is adopted and there is an effective limitation of issues. Local air quality action plans should also be considered and adhered to.

- 2.4 Air Quality Management Areas (AQMAs) are declared in areas that exceed national objectives for levels of particulates, nitrogen dioxide, sulphur dioxide, ozone, benzene, polycyclic aromatic hydrocarbons, butadiene, carbon monoxide, lead and / or nitrogen oxides.
- 2.5 The Clean Air Strategy identifies how the Government will tackle all sources of air pollution. The strategy proposes goals to cut public exposure to particulate matter pollution and outlines required action to meet these goals. The proposed measures include new legislation and local powers to act in areas with air pollution issues.
- 2.6 The 25-year Environment Plan discusses air quality; stating that the Government will take action to expand net gain approaches to include air quality improvements, as well as planting more trees in urban areas to improve air quality and changing fuel supplies to reduce air pollution.
- 2.7 The UK plan for tackling roadside nitrogen dioxide is an air quality plan focused on bringing nitrogen dioxide (NO₂) within statutory limits in the quickest time possible. The plan identifies that improving air quality and reducing carbon emissions is also important and wants to position the UK at the forefront of vehicle innovation by making motoring cleaner.
- 2.8 The Noise Policy Statement for England states that the implementation of transport planning systems aids in reducing environmental noise, which left unmanaged can cause an increased risk of health effects.
- 2.9 The Environmental Noise (England) Regulations 2006 apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas (agglomerations). They also require the production of noise action plans based on the maps for road and rail noise and noise in agglomerations. These plans identify areas that are exposed to the highest levels of noise and provide suggestions as to how to reduce these.
- 2.10 The Surrey Low Emissions Transport Strategy, which forms part of the Surrey Transport Plan, covers pollutants which are known to be emitted by local transport and which damage health and the environment. These are principally NO₂ and particulate matter (PM) and greenhouse gas emissions, including carbon dioxide (CO₂), which are causing climate change.

2.11 At the local level, and in relation to the air quality SA topic, Epsom and Ewell's Core Strategy includes the following policies:

- Policy CS 6 – Sustainability in New Developments

2.12 In addition to this, the Epsom Town Centre Area Action Plan identifies the following policies in relation to the air quality SA topic:

- Policy E13 – Changes to the Road Network

2.13 The Development Management Policies Document also identifies several policies relevant to the air quality SA topic:

- DM35 – Transport and New Development
- DM36 – Sustainable Transport for New Development

2.14 EEBC's Air Quality Annual Status Report (ASR) for 2021 provides the most up to date analysis of the borough's air quality. It concludes that air quality in Epsom and Ewell is very good with just one area, within an existing AQMA, continuing to record an exceedance of the national objective.

2.15 EEBC's 'Further Assessment of Nitrogen Dioxide in Ewell High Street' document includes revised modelling studies of the borough's AQMA for nitrogen dioxide (NO₂) in Ewell High Street.

Summary of current baseline

2.16 Councils are obligated to review and assess air quality in their region on a regular basis under the Local Air Quality Management (LAQM) process, set out in Section 82 of the Environment Act (1995).

2.17 Air quality in Epsom and Ewell is generally good. Monitoring of NO₂ occurred at 25 sites during 2020; the results of which are included in the most recent Air Quality ASR, which is a document submitted annually to the UK Government.

2.18 According to the latest ASR report for Epsom and Ewell (2021), there is one AQMA in the borough; the **Ewell AQMA** (pictured in **Figure 2.1** overleaf). Due to this, the 'Further Assessment of Nitrogen Dioxide in Ewell High Street' air quality action plan was released in 2010. This document recommends that the council undertakes the following actions, in respect of the findings for the statutory objectives relating to annual mean NO₂:

1. Retain the existing AQMA and undertake consultation on the findings arising from this report with the statutory and other consultees as required.
2. Amend the AQMA to incorporate those areas fringing the AQMA that exceed the objective if relevant exposure is confirmed.
3. Use the results of the source apportionment work in this report to identify potential actions that will enable the Council to work towards improving air quality.
4. Maintain current NO₂ monitoring capability within the Ewell AQMA.

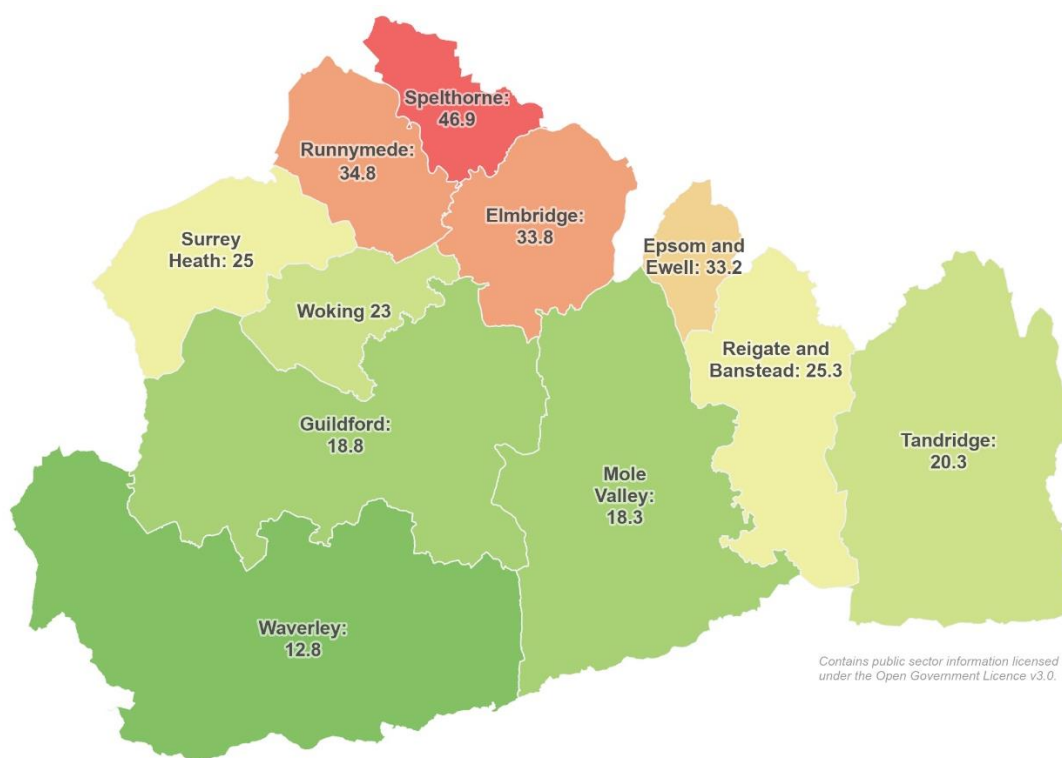


Figure 2.2 Index of accessibility to air quality score across Surrey

2.20 In terms of noise pollution, the Epsom Town Centre Area Action Plan highlights that noise and traffic fumes coming from congested traffic flowing past the market place have a detrimental impact on the environment. The A24, which cuts through the town centre, is a key road of concern, and during peak travel times the traffic emissions and noise along this road can be intrusive.

Summary of future baseline

2.21 New housing and employment provision implemented by the new Local Plan has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants. Although air quality in Epsom and Ewell is generally good, because there is an AQMA in the Local Plan area, the risks associated with exceedances of air quality objectives need to be considered when allocating future development in Epsom and Ewell.

2.22 Positive planning could be beneficial for air quality through opportunities to improve accessibility, particularly in terms of active travel and encouraging more local walkable journeys and sustainable connections. In doing so, it may be possible to reduce levels of NO₂ in the Ewell AQMA.

Key sustainability issues

2.23 The following key issues have been identified through the baseline review for this theme:

- With regards to improvements to air quality, the new Local Plan presents opportunities to improve accessibility and support more local and sustainable journeys / connections. These opportunities will be explored in the Communities and Health and Transport SA topics in **Chapters 6 and 12** respectively.

SA objectives and appraisal questions

2.24 Based on the key issues discussed above, it is proposed that the SA should include the objectives and assessment questions in **Table 2.2** below.

Table 2.2 Proposed objectives and assessment questions

SA objective	Appraisal questions
1. Deliver improvements in air quality in Epsom and Ewell?	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Reduce emissions of pollutants from transport? • Promote the use of low emission vehicles? • Promote enhancements in sustainable modes of transport, including walking, cycling and public transport? • Promote enhancements to green infrastructure networks to facilitate increased absorption and dissipation of pollutants?

3. Biodiversity

Focus of topic

- International, national, and local biodiversity designations
- Key habitats
- Key species
- Ecological networks
- Geological sites

Policy context

3.1 **Table 3.1** below presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key messages emerging from the review are then summarised after the table.

Table 3.1 Plans, policies and strategies

Document title	Year of publication
International	
<u>The Conservation of Habitats and Species Regulations</u>	2017
<u>The Ramsar Convention on Wetlands</u>	1971
National	
<u>National Planning Policy Framework (NPPF)</u>	2021
<u>Environment Act 2021</u>	2021
<u>Defra Policy Paper: Changes to the Habitat Regulations 2017</u>	2021
<u>A Green Future: Our 25 Year Plan to Improve the Environment</u>	2018
<u>Biodiversity 2020: A strategy for England's wildlife and ecosystem services</u>	2011
<u>The Natural Choice: securing the value of nature</u>	2011
<u>UK Biodiversity Action Plan</u>	2007
<u>Natural Environment and Rural Communities Act 2006</u>	2006
<u>Countryside and Rights of Way Act</u>	2000
<u>Wildlife and Countryside Act 1981</u>	1981
Local	
<u>Epsom and Ewell Core Strategy</u>	2007
<u>Epsom Town Centre Area Action Plan</u>	2011
<u>Epsom and Ewell Development Management Policies Document</u>	2015
<u>Epsom and Ewell Biodiversity Action Plan</u>	2020
<u>Biodiversity and Planning in Epsom and Ewell</u>	2015

- 3.2 The new Local Plan will need to have regard to the NPPF, which states that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity. This includes utilising a strategic approach to maintaining and enhancing networks of habitats and green infrastructure at the wider catchment or landscape scale.
- 3.3 Support is given through the Framework to establishing coherent ecological networks that are more resilient to current and future pressures. Trees notably make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, and that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards).
- 3.4 The Environment Act includes further provisions in relation to biodiversity, including parameters for biodiversity gain as a condition of planning permission, as well as biodiversity gain site registers and biodiversity credits. Consultation on the Biodiversity Net Gain Regulations recently closed in April 2022. The consultation set out proposals, and sought views, on how biodiversity net gain will work in practice.
- 3.5 The Environment Act also identifies a general duty to conserve and enhance biodiversity, including through biodiversity reports and local nature recovery strategies. Local nature recovery strategies will identify biodiversity priorities for the strategy area as well as a local habitat map. Furthermore, habitat maps are expected to include recovery and enhancement areas which are or could become of importance for biodiversity.
- 3.6 The recently published 25 Year Environment Plan sets out the Government's environmental plan of action over the next quarter century. The Plan aims to tackle the growing problems of waste and soil degradation, improving social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies and initiatives (such as mandatory biodiversity and environmental net gains, and the implementation of a Nature Recovery Network and Local Nature Recovery Strategies) which are focused on the following six key areas:
- Using and managing land sustainably.
 - Recovering nature and enhancing the beauty of landscapes.
 - Connecting people with the environment to improve health and wellbeing.
 - Increasing resource efficiency and reducing pollution and waste.
 - Securing clean, productive, and biologically diverse seas and oceans; and
 - Protecting and improving the global environment.
- 3.7 In this context, Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive and biologically diverse seas and oceans' directly relate to the biodiversity topic.

- 3.8 The UK Biodiversity Action Plan (BAP) identifies priority species and habitats requiring conservation action. Although the UK BAP has been superseded, BAP priority species and habitats have been used to draw up statutory lists of priority species and habitats in England.
- 3.9 The UK Government has placed regulations on Local Planning Authorities (LPAs) to lead in responding to biodiversity losses by adopting clear environmental and planning policy requirements to encourage developers to take account of biodiversity impacts.
- 3.10 At the local level, and in relation to the biodiversity SA topic, Epsom and Ewell's Core Strategy includes the following policies:
- Policy CS 3 – Biodiversity and Designated Nature Conservation Areas
- 3.11 In addition to this, the Epsom Town Centre Area Action Plan identifies the following policies in relation to the biodiversity SA topic:
- Policy E9 – Public Realm
- 3.12 The Development Management Policies Document also identifies several policies relevant to the biodiversity SA topic:
- DM4 – Biodiversity and New Development
 - DM5 – Trees and Landscape
- 3.13 At the local level, the Epsom and Ewell BAP (2020 to 2030) describes the biodiversity within the area covered by the new Local Plan, identifies priorities, define objectives, set targets and implement actions. The aim of the Epsom and Ewell BAP is as follows:
- “This plan aims to conserve and enhance habitat types and species of principal importance within the borough of Epsom and Ewell as identified and listed under section 41 (England) of the NERC Act (2006) and coordinates with the Surrey Nature Partnership Biodiversity Working Group. In addition, the plan will seek to identify actions that will afford wider protection to Biodiversity across the borough through the use of the local authority planning process. It will also seek to create awareness that managing the Borough's Biodiversity is a key part of the infrastructure of the Borough. Just as important as roads, schools, business and housing development etc.”*
- 3.14 Biodiversity and Planning in Epsom and Ewell provides guidance to assist EEBC, developers and residents in ensuring that the Borough's biodiversity is both protected and enhanced when new development takes place. This guidance is linked to the Epsom and Ewell BAP and is an outcome of the objectives set out in the BAP.

Summary of current baseline

Internationally designated sites

- 3.15 To ensure the European Directives were operable in the UK after the end of the EU transition period, changes were made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. In this respect, Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) in the UK

no longer form part of the EU Natura 2000 ecological network. Instead, the 2019 Regulations propose the creation of a national site network within the UK territory.⁶ The network comprises the designated sites already designated under the Nature Directives (i.e., 79/409/EEC and 92/43/EEC), along with any additional sites which are designated under the 2019 Regulations. The national site network continues to operate in parallel with other designations and contributes towards the UK's international commitments for protected areas.

3.16 The Mole Gap to Reigate Escarpment SAC is located approximately 2 kilometres south of the Local Plan area. Located in the North Downs, this SAC is characterised by a mosaic of chalk downland habitats, ranging from open chalk grassland to scrub and various types of semi-natural woodland on the scarp and dip slopes of the North Downs.⁷ One of the most important features of this SAC is the stand of Box scrub, which is unique to the UK, as well as large but fragmented areas of nationally significant calcareous grassland, which support a variety of orchid species. In addition to this, the SAC contains stands of Beech and Yew dominated woodland and a significant area of dry heathland and acid grassland at Headley Heath. The SAC supports the internationally protected Great Crested Newt, as well as Dormouse and Bechstein's Bat.

3.17 In addition to the above, there are several other internationally designated sites for biodiversity in the wider region surrounding Epsom and Ewell. These SPAs, SACs and Ramsar sites are shown in **Figure 3.1** below.

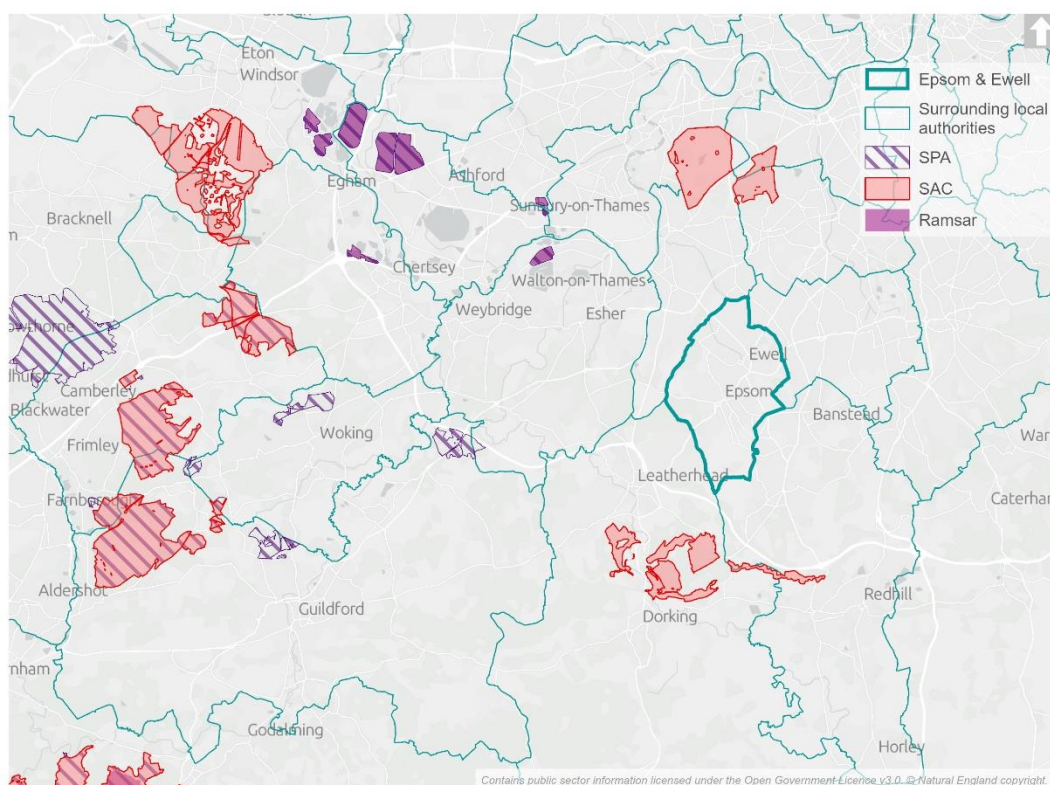


Figure 3.1 Internationally designated sites for biodiversity in the vicinity of Epsom and Ewell

⁶ DEFRA (2021): Policy Paper: Changes to the Habitats Regulations 2017', [online] available to access [here](#)

⁷ Mole Valley District Council (2012): 'Mole Valley Local Development Framework – Mole Gap to Reigate Escarpment Special Area of Conservation Guidance Note', [online] available to access via [this link](#)

Nationally designated sites

3.18 Sites of Special Scientific Interest (SSSI) are protected by law to conserve their wildlife or geology. Natural England is a statutory consultee on development proposals that might impact on SSSIs. Several SSSIs fall either within or near Epsom and Ewell, which are presented in **Figure 3.2** overleaf and listed below:

- **Banstead Downs SSSI** – located approximately 800 metres away from the eastern boundary of Epsom and Ewell.
- **Epsom and Ashted Commons SSSI** – falls partially within the central western part of Epsom and Ewell; and
- **Stones Road Pond SSSI** – covers a pond which falls within the centre of Epsom and Ewell.

3.19 SSSI Impact Risk Zones (IRZ) are a GIS tool / dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location. The entire Local Plan area is covered by several IRZs, forming a buffer around the SSSIs found both within and near Epsom and Ewell. The impact of these IRZs on development is as follows:

- **Banstead Downs SSSI** – the IRZ for this SSSI falls into a small part of Epsom and Ewell in the east, however it is not for the types of development likely to come forward through this Plan (residential or rural residential).
- **Epsom and Ashted Commons SSSI** – the IRZ for this SSSI impacts all planning applications (except householder applications) within a 50-metre radius, residential (10 units or more) and rural residential development within a 200-metre radius, residential (100 units or more) and rural residential (10 units or more) development within a 500-metre radius, and residential (100 units or more) and rural residential (50 units or more) development within a 1-kilometre radius.
- **Stones Road Pond SSSI** – the IRZ for this SSSI impacts all planning applications (except householder applications) within a 500-metre radius, and residential (100 units or more) and rural residential (50 units or more) development within a 1-kilometre radius.

3.20 National Nature Reserves (NNRs) have been established to protect some of England's most important habitats, species, and geology, and to provide 'outdoor laboratories' for research. Most NNRs offer significant opportunities for schools, specialist interest groups and the public to experience wildlife at first hand and to learn more about nature conservation. Only one NNR falls near Epsom and Ewell, which is presented in **Figure 3.2** overleaf and listed below:

- **Ashted Common NNR** – located adjacent to the western boundary of Epsom and Ewell, covering the same area as part of the Epsom and Ashted Commons SSSI which lies outside of Epsom and Ewell.

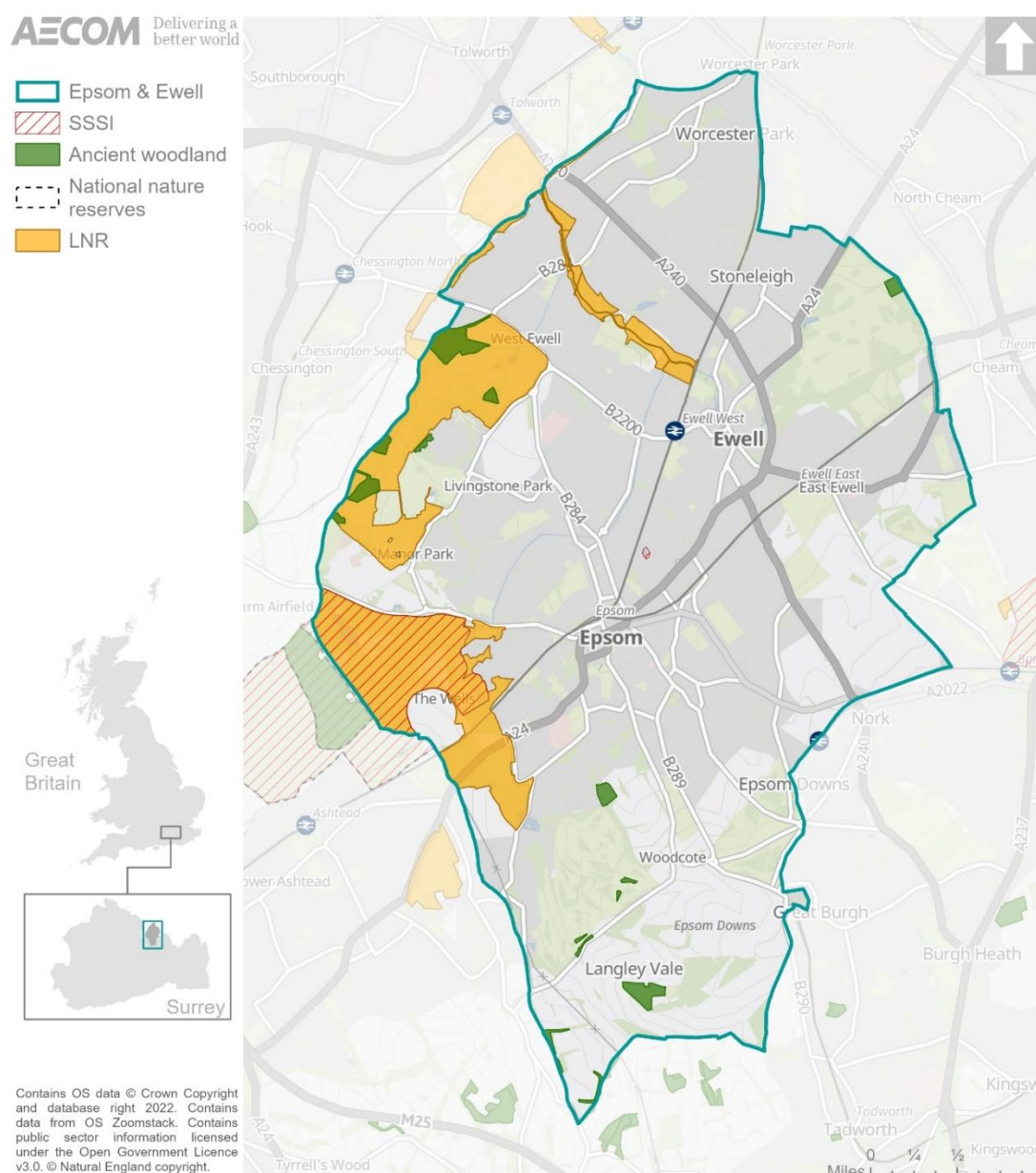


Figure 3.2 Nationally designated sites and LNRs within Epsom and Ewell

Locally important sites

3.21 Local Nature Reserves (LNRs) are a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949 by principal local authorities. They are places with wildlife or geological features that are of special interest locally, offering people opportunities to study or learn about nature or simply enjoy it. Several LNRs are located within or near Epsom and Ewell, which are presented in **Figure 3.2** above and listed below:

- **Ashted Park LNR** – located approximately 200 metres away from the south-western boundary of Epsom and Ewell.
- **Bonesgate Open Space LNR** – located adjacent to the north-western boundary of Epsom and Ewell.
- **Castle Hill LNR** - located adjacent to the north-western boundary of Epsom and Ewell.

- **Cuddington Meadows LNR** – located approximately 800 metres away from the eastern boundary of Epsom and Ewell.
- **Epsom Common LNR** - falls within the central western part of Epsom and Ewell, covering the same area as the part of Epsom and Ashted Commons SSSI which lies within Epsom and Ewell.
- **Hogsmill LNR** – falls within the northern part of Epsom and Ewell.
- **Horton Country Park LNR** – falls within the north-western part of Epsom and Ewell.
- **Southwood Open Space LNR** – located approximately 300 metres away from the northern boundary of Epsom and Ewell; and
- **Tolworth Court Farm Fields LNR** – located adjacent to the north-western boundary of Epsom and Ewell.

3.22 There are a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to Epsom and Ewell, including:

- Deciduous woodland, including one relatively large area in the western part of Epsom and Ewell.
- Good quality semi-improved grassland, including one relatively large area in the eastern part of Epsom and Ewell.
- Lowland calcareous grassland.
- Traditional orchard; and
- Wood pasture and parkland, including one relatively large area in the north-eastern part of Epsom and Ewell, and another in the southern part.

3.23 There are also several areas of ancient woodland in Epsom and Ewell (shown in **Figure 3.2** above), as well as National Forest Inventory woodland including broadleaved, felled, low density, mixed mainly broadleaved, mixed mainly conifer, and young trees.

3.24 There are several areas in the national habitat network within Epsom and Ewell, including restorable habitat, fragmentation action zones, network enhancement zones 1 and 2, and network expansion zones.

3.25 Two priority species for Countryside Stewardship (CS) targeting can be found within Epsom and Ewell, including butterfly species **Brown Hairstreak** (*Thecla betulae*) and ground-nesting bird **Lapwing** (subfamily *Vanellinae*).

3.26 In addition to this, ecological features of interest which might have the potential to be impacted by new development areas include trees, hedgerows, watercourses, road verges, and rail sidings. As these features play an important role in providing connectivity corridors and refugia for migrating and foraging species, it will be important for the new Local Plan to consider the potential implications on such features within the plan making process.

3.27 The Surrey Biodiversity Information Centre (SBIC) holds detailed records of notable sites and species within Surrey.⁸ This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians, and

⁸ Surrey Wildlife Trust (no date): 'Surrey Biodiversity Information Centre', [online] available to access via [this link](#)

reptiles; many of which are protected under the Wildlife and Countryside Act 1981 (as amended) and under Section 41 of the Natural Environment and Rural Communities Act 2006. In this respect, the designated sites for biodiversity and BAP Priority Habitats within and near Epsom and Ewell are likely to support populations of protected species.

- 3.28 Also of importance to local biodiversity is the Hogsmill River, which is home to a variety of fish species including dace, chub, eel and gudgeon, as well as invertebrates that rely on the river for all or part of their lifecycle including mayflies, freshwater shrimp and damselflies.⁹ Moreover, the open space surrounding the river has a mix of scrub, meadow and woodland habitats that support 26 species of butterfly, four species of bat and over 100 species of bird.

Summary of future baseline

- 3.29 Habitats and species will potentially face increasing pressures from future development within Epsom and Ewell, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change. This has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.
- 3.30 Internationally and nationally designated sites are particularly sensitive to air quality issues and recreational pressures. Regarding air quality, exceeding critical values for air pollutants may result in changes to the chemical status of habitat substrate, accelerating or damaging plant growth, altering vegetation structure and composition and thereby affecting the quality and availability of nesting, feeding or roosting habitats. Additionally, the nature, scale, timing, and duration of some human activities can result in the disturbance of birds at a level that may affect their behaviour, and consequently affect the long-term viability of their populations.
- 3.31 The new Local Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species, and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them, in addition to delivering net gains through new development areas.
- 3.32 To maintain and improve the condition of biodiversity in the future, it will be crucial to effectively coordinate the delivery of housing, employment, and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised within Epsom and Ewell and in the surrounding areas. This is likely to be further enhanced through collaboration and partnership working, including potentially through initiatives which come forward in response to the requirements of key policy and legislative drivers (e.g., nature recovery networks, and local nature recovery strategies).
- 3.33 It is important that Epsom and Ewell work with neighbouring local authorities when considering biodiversity as ecological networks and corridors cross boundaries. The Local Plan should be consistent with those of neighbouring local authorities to ensure biodiversity is protected on a regional scale.

⁹ South East Rivers Trust (no date): 'Hogsmill', [online] available to access via [this link](#)

Key sustainability issues

3.34 The following key issues have been identified through the baseline review for this topic:

- There are three nationally designated sites for biodiversity within Epsom and Ewell, which are Banstead Downs SSSI, Epsom and Ashted Commons SSSI, and Stones Road Pond SSSI.
- Severall SSSI IRZs for the types (and potentially the amount) of development likely to come forward during the plan period, including residential and rural residential development, fall within Epsom and Ewell.
- There are three LNRs within Epsom and Ewell, as well as six LNRs located either adjacent to or close to the boundary of Epsom and Ewell.
- There are a variety of BAP Priority Habitats located within or within proximity to Epsom and Ewell, including areas of deciduous woodland, good quality semi-improved grassland, lowland calcareous grassland, traditional orchard, and wood pasture and parkland.
- Areas of ancient woodland can be found in Epsom and Ewell, as well as National Forest Inventory woodland including broadleaved, felled, low density, mixed mainly broadleaved, mixed mainly conifer, and young trees.
- There are several areas in the national habitat network within Epsom and Ewell, including restorable habitat, fragmentation action zones, network enhancement zones 1 and 2, and network expansion zones.
- Two priority species for CS targeting can be found within Epsom and Ewell, which are Brown Hairstreak (*Thecla betulae*) and Lapwing (*Vanellinae*).
- Ecological features of interest in Epsom and Ewell which might have the potential to be impacted by new development areas include trees, hedgerows, watercourses, road verges, and rail sidings.
- The SBIC holds detailed records of protected or notable species within Epsom and Ewell. This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians, and reptiles.

SA objectives and appraisal questions

3.35 Based on the key issues discussed above, it is proposed that the SA should include the objectives and assessment questions in **Table 3.2** below.

Table 3.2 Proposed objectives and assessment questions

SA objective	Appraisal questions
2. Support the integrity of internationally, nationally, and locally designated sites	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Protect the integrity of the internationally and nationally designated sites within and near Epsom and Ewell?

SA objective

Appraisal questions

	<ul style="list-style-type: none"> • Manage pressures on locally designated sites for biodiversity and geodiversity in Epsom and Ewell?
3. Protect and enhance habitats and species in Epsom and Ewell	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Protect and enhance priority habitats, and the habitat of priority species? • Protect key species during the construction and operational phases of new development areas? • Protect and enhance ecological networks? • Achieve a net gain in biodiversity? • Increase the resilience of Epsom and Ewell's biodiversity to the potential effects of climate change? • Enhance and protect water related biodiversity? • Provide opportunities to develop new habitats to link rivers, lakes and wetlands?
4. Enhance understanding of biodiversity	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Support access to, interpretation and understanding of biodiversity? • Encourage opportunities for engagement with Epsom and Ewell's biodiversity resource?

4. Climate change adaptation

Focus of topic

- Fluvial flood risk
- Surface water flood risk
- Climate change resilience

Policy context

4.1 **Table 4.1** below presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key messages emerging from the review are then summarised after the table.

Table 4.1 Plans, policies and strategies

Document title	Year of publication
National	
National Planning Policy Framework (NPPF)	2021
A Green Future: Our 25 Year Plan to Improve the Environment	2018
National Infrastructure Assessment	2021
The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting	2018
UK Climate Change Risk Assessment 2017	2017
Flood and Water Management Act 2010	2010
The UK Low Carbon Transition Plan: National strategy for climate and energy	2009
Local	
Surrey County Council Local Flood Risk Management Strategy 2017 to 2032	2017
Epsom and Ewell Core Strategy	2007
Epsom Town Centre Area Action Plan	2011
Epsom and Ewell Development Management Policies Document	2015
Epsom and Ewell Four Year Plan 2020 to 2024	2020
Epsom and Ewell Strategic Flood Risk Assessment (SFRA)	2018

4.2 Chapter 14 of the NPPF is dedicated to meeting the challenges associated with climate change, including flooding, and states the following regarding climate change adaptation:

- Plans should take a proactive approach to adapting to climate change, considering the long-term implications of flood risk, coastal change, water supply, biodiversity and landscapes and the risk of overheating from rising temperatures.

- 4.3 The 25 Year Environment Plan seeks to manage land resources sustainably, recover and reinstate nature, protect soils and habitats, increase resource efficiency, improve water quality, and connect people with the environment.
- 4.4 The National Infrastructure Assessment is published every five years and analyses the UK's long-term economic infrastructure needs to create a strategic vision and recommendations. The baseline report focuses on three key strategic outcomes: reaching net zero, reducing environmental impacts, and adapting to a changing climate and supporting levelling up. The baseline report states that climate change will increase pressures on all sectors, including economic infrastructure. Chapter 3 of the report highlights that infrastructure needs to adapt to the growing risks of extreme weather.
- 4.5 The National Adaptation Programme outlines the Government's response to the second Climate Change Risk Assessment, demonstrating the actions the government is currently taking and actions it will be taking in the future. It highlights the high-risk flooding and coastal change poses to communities, businesses and infrastructure, the high risk an increase in temperature poses to health, wellbeing and productivity, as well as the impacts climate change could have on water and energy supply shortage, natural capital, food production and trade and pests, diseases and invasive non-native species.
- 4.6 The UK Climate Change Risk Assessment is published every five years as dictated by the Climate Change Act 2008. It is an assessment of the risks to the UK arising from climate change and the subsequent adaptation programme to address said risks in combination with delivering climate change resilience. The 2017 assessment identified six priority risk areas:
- Flooding and coastal change risks to communities, businesses, and infrastructure.
 - Risks to health, well-being, and productivity from high temperatures.
 - Risk of shortages in the public water supply, and for agriculture, energy generation and industry.
 - Risks to natural capital, including terrestrial, coastal, marine, and freshwater ecosystems, soils, and biodiversity.
 - Risks to domestic and international food production and trade; and
 - New and emerging pests and diseases, and invasive non-native species, affecting people, plants, and animals.
- 4.7 The Flood and Water Management Act 2010 provides for better and more comprehensive management of flood risk for people, homes, and businesses, in addition to aiding in safeguarding safeguard community groups from unaffordable rises in surface water drainage charges and protecting consumer water supplies.
- 4.8 The UK Low Carbon Transition Plan: National strategy for climate and energy outlines a five-point plan to tackle climate change, with the following points being of relevance to climate change adaptation:
- Protecting the public from immediate risk; spending money on flood protection, implementing a heat wave plan in the NHS and aiding communities affected by coastal erosion.

- Preparing for the future; factoring climate risk into the decision-making process, changing infrastructure methods, managing water, and adjusting farming practices.
 - Supporting individuals, communities, and businesses to play their part, raising awareness, and providing a variety of support for individuals, communities, and businesses.
- 4.9 The plan outlines working towards these five points through several chapters: transforming our power sector, transforming our homes and communities, transforming our workplaces and jobs, transforming transport, and transforming farming and managing our land sustainably.
- 4.10 Surrey County Council's (SCC) Local Flood Risk Management Strategy (2017 to 2032) has been produced to inform individuals, communities and businesses of the steps SCC and its partners are taking to manage the impact of flooding in Surrey. The Strategy consists of four main elements:
- Vision – this is the main goal that will be achieved over the lifetime of the Strategy.
 - Purpose – this summarises who will be involved in achieving the Vision and how it will be done.
 - Principles – these provide context for the Vision, and are important concepts that are considered as part of all the objectives; and
 - Objectives – these are the specific activities will be undertaken to achieve the Vision.
- 4.11 At the local level, and in relation to the climate change adaptation SA topic, Epsom and Ewell's Core Strategy includes the following policies:
- Policy CS 6 – Sustainability in New Developments
- 4.12 In addition to this, the Epsom Town Centre Area Action Plan identifies the following policies in relation to the climate change adaptation SA topic:
- Policy E14 – Depot Road and Upper High Street
 - Policy E15 – The Utilities Site
 - Policy E17 – Other Opportunity Sites
- 4.13 The Development Management Policies Document also identifies several policies relevant to the climate change adaptation SA topic:
- DM19 – Development and Flood Risk
- 4.14 Epsom and Ewell's Four Year Plan sets out the borough's strategy for the provision of local services for residents, businesses and visitors during the period 2020 to 2024. One of the priorities of the plan is to agree and implement a Climate Change Strategy and Action Plan.
- 4.15 The Epsom and Ewell SFRA aims to support the Local Plan in respect of the development and review of policies related to flood risk management and for the allocation of land for future development. In addition to this, the SFRA can:

- Inform the development of EEBC policy that will underpin decision making within the borough, particularly within areas that are affected by (and / or may adversely impact upon) flooding.
- Assist the development management process by providing a more informed response to development proposals which may be affected by flooding, influencing their acceptability and design.
- Identify and implement strategic solutions to flood risk, providing the basis for possible future flood attenuation works by a range of agencies with responsibility for flood risk management.
- Support SCC in their role as Lead Local Flood Authority (LLFA); and
- Support and inform the Council's emergency planning response to flooding.

Summary of current baseline

Flood risk

4.16 As shown in **Figure 4.1** overleaf, key area of concern regarding climate change adaptation in Epsom and Ewell is flood risk. In terms of fluvial flood risk zones, the majority of Epsom and Ewell is in Flood Zone 1. However, there are some isolated areas of the borough within Flood Zones 2 and 3, which are largely associated with the Hogsmill River. These areas include:

- Briarwood Road
- Green Lanes
- Hook Road
- Horton Hill
- Longmead Road
- Pound Lane

4.17 As shown in **Figure 4.2** overleaf, there are also several areas of Epsom and Ewell which have a medium to high surface water flood risk. Again, these areas are largely associated with the Hogsmill River, although, more impermeable areas of land (such as roads and pavements) are also key areas of surface water flood risk.

4.18 The SFRA highlights that a relatively small percentage of properties within Epsom and Ewell are at risk of fluvial flooding. However, the urbanised areas, steep topography and potential rainfall runoff from the Epsom Downs means that Epsom and Ewell has a high susceptibility to surface water, groundwater and localised flooding in certain parts of the borough. The risk of flooding posed to properties arises from several sources including river flooding, surface water, localised runoff, and sewer flooding. However, the most significant of these is surface water runoff on a large scale. The watercourses in the borough that pose significant flood risk to buildings and infrastructure are the Hogsmill River and its tributaries, which include the Bonesgate Stream, the Horton Stream, Green Lanes Stream and Ewell Court Stream. Notably, most of the Ewell Court Stream and lengths of Green Lanes Stream are culverted.

4.19 Notably, the catchment of the Hogsmill River catchment covers an area beyond the boundary of Epsom and Ewell. Although no watercourses are present in the upper reaches of the catchment, a considerable contributing area exists in the boroughs of Reigate and Banstead and Sutton. These areas are highly development and therefore runoff in extreme events is significant to flood risk in Epsom and Ewell. In this respect, planning for flood risk management in both Epsom and Ewell's Local Plan and neighbouring boroughs' Local Plans will impact flood risk within Epsom and Ewell, and therefore cross boundary collaboration is essential to addressing flood risk in the wider area.

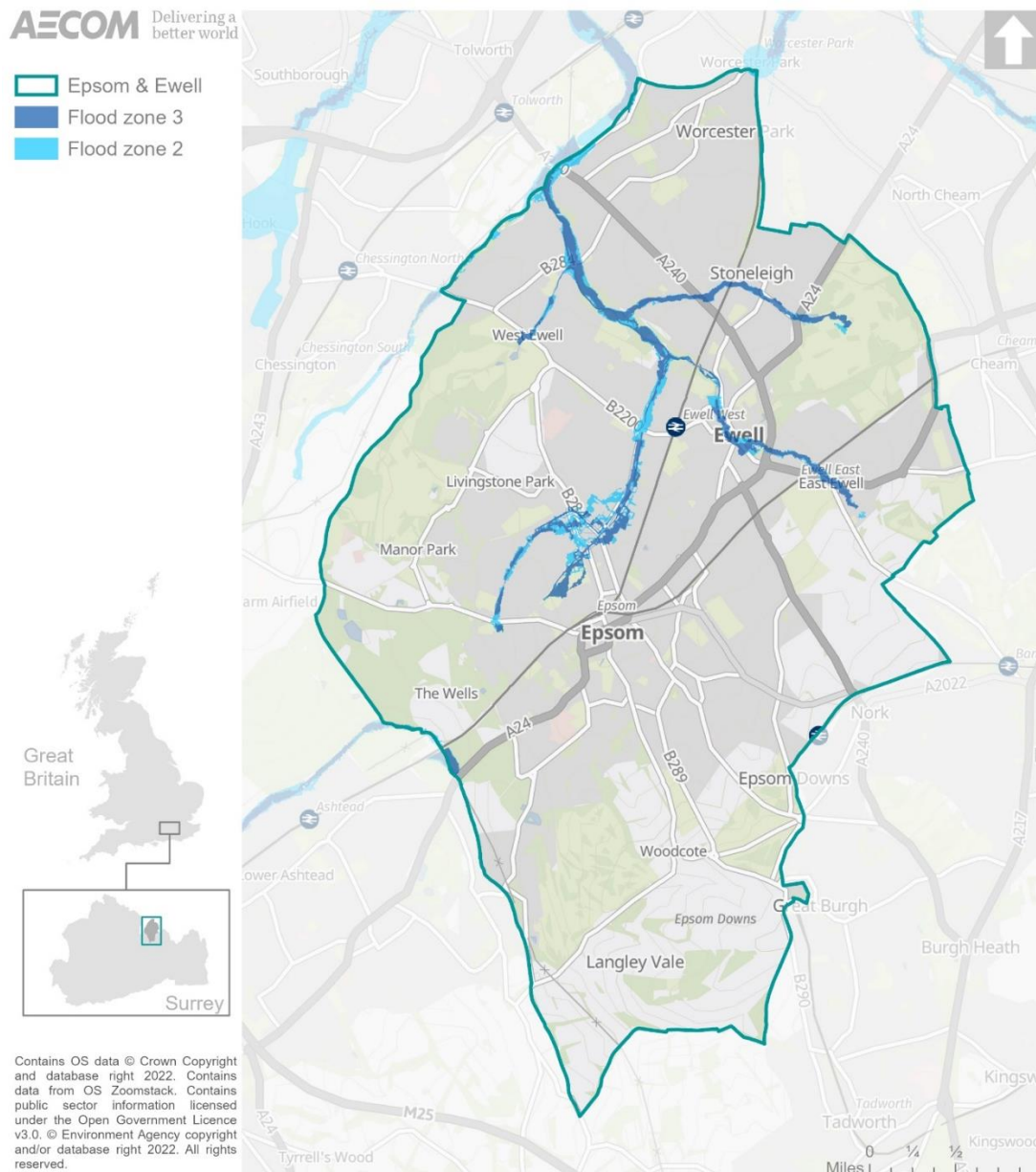


Figure 4.1 Fluvial flood risk in Epsom and Ewell

Figure 4.2 Surface water flood risk in Epsom and Ewell

Summary of future baseline

4.20 Climate change has the potential to increase the occurrence of extreme weather events in Epsom and Ewell. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation. Specifically, new development areas have the potential to increase flood risk through factors such as changing surface and groundwater flows, overloading existing inputs to the drainage and wastewater networks and / or increasing the number of residents exposed to areas of existing flood risk.

4.21 In terms of climate change adaptation, it is anticipated that flood risk concerns can be mitigated in part by the inclusion of sustainable drainage systems (SuDS) and high-quality design within new development areas which incorporates permeable areas and materials. Moreover, SCC's Local Flood Risk Management Strategy and the Epsom and Ewell SFRA are useful evidence sources that can be used to inform policy development.

Key sustainability issues

4.22 The following key issues have been identified through the baseline review for this theme:

- The majority of Epsom and Ewell is within Flood Zone 1, however there are some isolated areas of the borough within Flood Zones 2 and 3, which are largely associated with the Hogsmill River. It will be vital that the new Local Plan guides development away from these areas at increased risk.
- A similar pattern can be seen for surface water flood risk, with areas draining into / adjacent to Hogsmill River at the highest risk of surface water flooding. However, more impermeable areas of land (such as roads and pavements) are also key areas of surface water risk in Epsom and Ewell.
- SuDS and other design measures will be vital in ensuring new development withstands both current and future flood risk. However, the new Local Plan should steer development away from areas at increased risk of flooding.
- The new Local Plan should seek to increase the resilience of Epsom and Ewell to the effects of climate change by supporting and encouraging adaptation strategies, particularly those that address flood risk.

SA objectives and appraisal questions

4.23 Based on the key issues discussed above, it is proposed that the SA should include the objectives and assessment questions in **Table 4.2** below.

Table 4.2 Proposed objectives and assessment questions

SA objective	Assessment questions
5. Support Epsom and Ewell's resilience to the potential effects of climate change, particularly flooding	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Ensure that development does not take place in areas at medium to high risk of flooding, considering the likely future effects of climate change? • Improve and extend green infrastructure networks to support adaptation to the potential effects of climate change? • Sustainably manage water run-off through the use of SuDS, reducing surface water runoff without increasing flood risk elsewhere? • Ensure the potential risks associated with climate change are considered through new development areas?

5. Climate change mitigation

Focus of topic

- Greenhouse gas emissions
- Potential effects of climate change

Policy context

5.1 **Table 5.1** below presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key messages emerging from the review are then summarised after the table.

Table 5.1 Plans, policies and strategies

Document title	Year of publication
International	
UN Paris Agreement	2016
National	
National Planning Policy Framework (NPPF)	2021
The Clean Growth Strategy	2017
The Clean Air Strategy 2019	2019
Net Zero Strategy: Build Back Greener	2021
A Green Future: Our 25 Year Plan to Improve the Environment	2018
National Infrastructure Assessment	2021
The UK Sixth Carbon Budget	2020
The UK Low Carbon Transition Plan: National strategy for climate and energy	2009
Climate Change Act 2008	2008
Blueprint for a resilient economy	2019
Local	
Energy South 2 East Local Energy Strategy	2019
Epsom and Ewell Core Strategy	2007
Epsom Town Centre Area Action Plan	2011
Epsom and Ewell Development Management Policies Document	2015
Epsom and Ewell Climate Change Action Plan	2019

5.2 The UN Paris Agreement is an international treaty on climate change with the aim to limit global warming to below 2 degrees Celsius, preferably to 1.5 degrees Celsius, compared to pre-industrial levels. To achieve this, the planet should be climate neutral by the mid-century.

5.3 Chapter 14 of the NPPF is dedicated to meeting the challenge of climate change, and states the following regarding climate change mitigation:

- The planning system should shape places to contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the reuse of existing resources, and support renewable and low carbon energy and associated infrastructure.
- 5.4 The Clean Growth Strategy, Clean Air Strategy and the Net Zero Strategy are a collection of documents seeking to progress the Government's commitment to becoming net zero by 2050 under the UK Climate Change Act 2008. The documents outline how the Government will tackle air pollution sources whilst maintaining an affordable energy supply and increasing economic growth. This parallels with the 25 Year Environment Plan, which seeks to manage land resources sustainably, recover and reinstate nature, protect soils and habitats, increase resource efficiency, improve water quality, and connect people with the environment. The documents interlink with the Government's commitment to decarbonising transport, which recognises the need to undertake action to adapt the transport sector and increase resilience to climate change risks.
- 5.5 The National Infrastructure Assessment is published every five years and analyses the UK's long-term economic infrastructure needs to create a strategic vision and recommendations. The baseline report focuses on three key strategic outcomes: reaching net zero, reducing environmental impacts, and adapting to a changing climate and supporting levelling up. The baseline report states that climate change will increase pressures on all sectors, including economic infrastructure.
- 5.6 The Sixth Carbon Budget is the legal limit of UK net greenhouse gas emissions and requires the country to reduce emissions by 78% by 2035 relative to 1990 levels. This puts the country on track to achieve net-zero emissions by 2050 at the latest. The first five carbon budgets have already been put into legislation and run up to the year 2032.
- 5.7 The UK Low Carbon Transition Plan: National strategy for climate and energy outlines a five-point plan to tackle climate change, with the following points being of relevance to climate change mitigation:
- Limiting the severity of future climate change through a new international climate agreement; leading international efforts.
 - Building a low carbon UK; cutting emissions and investing in energy efficiency and clean energy technologies.
 - Supporting individuals, communities, and businesses to play their part, raising awareness, and providing a variety of support for individuals, communities, and businesses.
- 5.8 The plan outlines working towards these five points through several chapters: transforming our power sector, transforming our homes and communities, transforming our workplaces and jobs, transforming transport, and transforming farming and managing our land sustainably.
- 5.9 The UK Climate Change Act 2008 established a framework to develop an economically viable emissions reduction path. The Climate Change Act 2008 (2050 Target Amendment) Order of 2019 put in place the legally binding target of achieving net-zero emissions by 2050. The Climate Change Act includes the following:

- The UK Government must reduce greenhouse gas emissions by a minimum of 100% of 1990 levels by 2050.
- The Act requires the Government to produce legally binding carbon budgets – a cap on the amount of greenhouse gases emitted in the UK over a five-year period.
- The Committee on Climate Change was set up to advise the Government on emissions targets and report any progress to parliament.
- The Act requires the Government to assess and prepare for the risks and opportunities linked to climate change for the UK. The Committee on Climate Change's Adaptation Sub-Committee advises on these risks.

5.10 In May 2019, the UK Parliament declared a climate emergency, with a view to explicitly acknowledging that human activities are significantly affecting the climate, and actions to mitigate and adapt to climate change should be paramount. This declaration has been mirrored by several local planning authorities across the country. Further context is provided by the recent commitment by environmental law firm Client Earth to request that all local authorities with emerging local plans to *“explain how they will set evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy”*¹⁰. Additionally, in response to the Covid-19 pandemic, the Green Alliance's 'Blueprint for a Resilient Economy' report outlines the following five essential building blocks to support new long-term employment opportunities, thriving businesses and a healthier, fairer society, whilst protecting against the potentially devastating future impacts of climate change and nature's decline:

- Invest in net zero infrastructure.
- Restore nature.
- Stop wasting valuable resources.
- Ensure clean air and healthy places; and
- Make the recovery fair.

5.11 The Energy South 2 East Local Energy Strategy has been developed to enable the Coast to Capital, Enterprise M3 and South East Local Enterprise Partnerships (LEPs) of England to achieve clean growth from now until 2050 in energy across power, heat and transport sectors. The shared vision for energy in the region is *“to become a leader for sustainable energy production within the UK, powering innovative, decarbonised and clean economic growth”*.

5.12 At the local level, and in relation to the climate change mitigation SA topic, Epsom and Ewell's Core Strategy includes the following policies:

- Policy CS 6 – Sustainability in New Developments
- Policy CS 16 – Managing Transport and Travel

5.13 In addition to this, the Epsom Town Centre Area Action Plan identifies the following policies in relation to the climate change mitigation SA topic:

- Policy E8 – Town Centre Energy Generation

¹⁰ Client Earth (2019) Lawyers put local authorities on notice over climate inaction [online] available to access [here](#)

- Policy E10 – Improving Accessibility and Facilities for Cyclists

5.14 The Development Management Policies Document also identifies several policies relevant to the climate change mitigation SA topic:

- DM5 – Trees and Landscape
- DM12 – Housing Standards
- DM36 – Sustainable Transport for New Development

5.15 In 2019, Epsom and Ewell committed to their Climate Change Action Plan, which involved setting an ambitious target of becoming carbon neutral by 2035. This 4-year plan includes implementing a range of measures to help reduce the council's own emissions as well as promoting good practice, including:

- Increasing the number of safe cycle routes throughout the borough.
- Devising opportunities to shift away from reliance on cars to travel in the borough.
- Exploring potential for land in the borough to be used for sustainable energy production.
- Working with relevant specialist groups in the community to drive up sustainable practice both inside and outside of the organisation.
- Promoting the use of more sustainable materials in packaging; and
- Actively seeking opportunities to develop carbon neutral homes in the Borough.

Summary of current baseline

Contribution to climate change

5.16 As shown in **Figure 5.1** overleaf, the largest contributing sector to CO₂ emissions in Epsom and Ewell is the domestic sector. Although this sector has experienced a 65.4 kt CO₂ decrease in emissions, this only represents a 34.8% decrease. Comparatively, whilst the industry sector has only experienced a 6.6 kt CO₂ decrease in emissions, this represents a 54.7% decrease. Notably, the transport sector has experienced a 15.9 kt CO₂ decrease in emissions during this period, which only represents a 17% decrease – this is a low figure given this sector is the second largest contributing sector to CO₂ emissions.

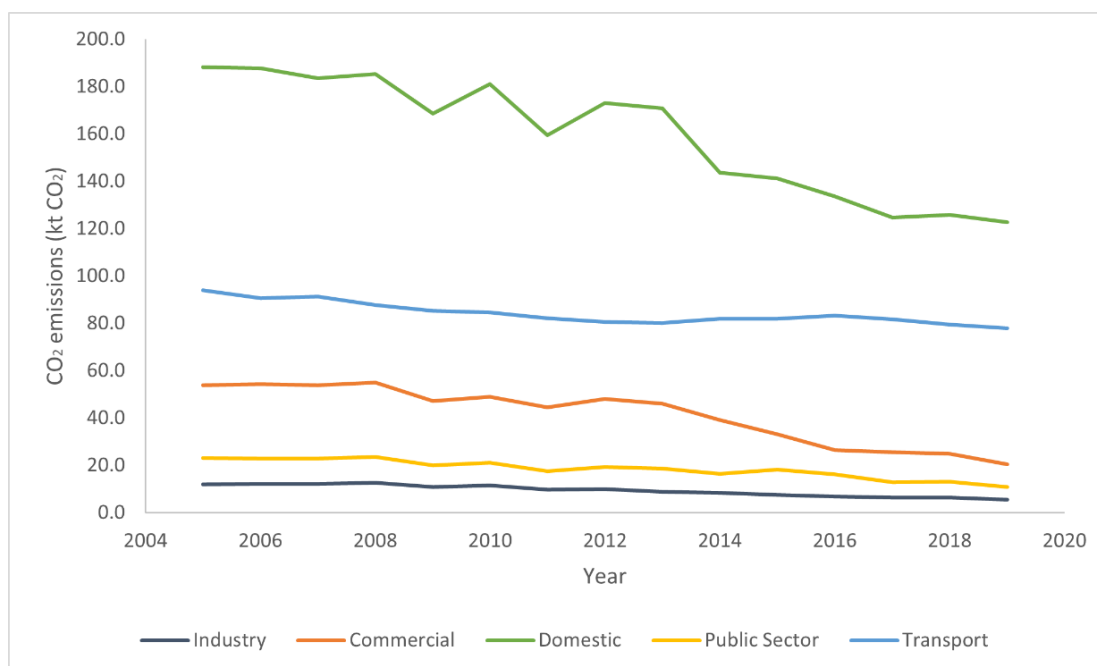


Figure 5.1 Trend in CO₂ emissions (kt CO₂) by sector in Epsom and Ewell between 2005 and 2019

- 5.17 Notably, transport is the largest emitting sector in the UK, producing 27% of total emissions in 2019.¹¹ Of this, 91% came from road transport vehicles (111 MtCO₂e). The biggest contributors to this were cars and taxis, which made up 61% of the emissions from road transport (68 MtCO₂e).
- 5.18 The uptake of Ultra Low Emission Vehicles (ULEVs) will contribute positively towards the reduction of road transport related emissions. In line with assumptions made by the Department for Transport's 'Road to Zero' report (2018), it is assumed that ULEV uptake will increase rapidly in the coming decade and therefore aside from HGVs, all vehicles could be ultra-low emission (powered either by hydrogen or electricity) by 2030.
- 5.19 **Figure 5.2** overleaf shows that CO₂ emissions per capita (t) in Epsom and Ewell have remained significantly lower than the South East and England during the period 2005 to 2019. Epsom and Ewell has also experienced a slightly larger decrease in CO₂ emission, at 45.4%, than both the South East (44.5%) and England (42.9%) during this time period.

¹¹ YK Gov (2021): 'Transport and environmental statistics: Autumn 2021', [online] available to access via [this link](#)

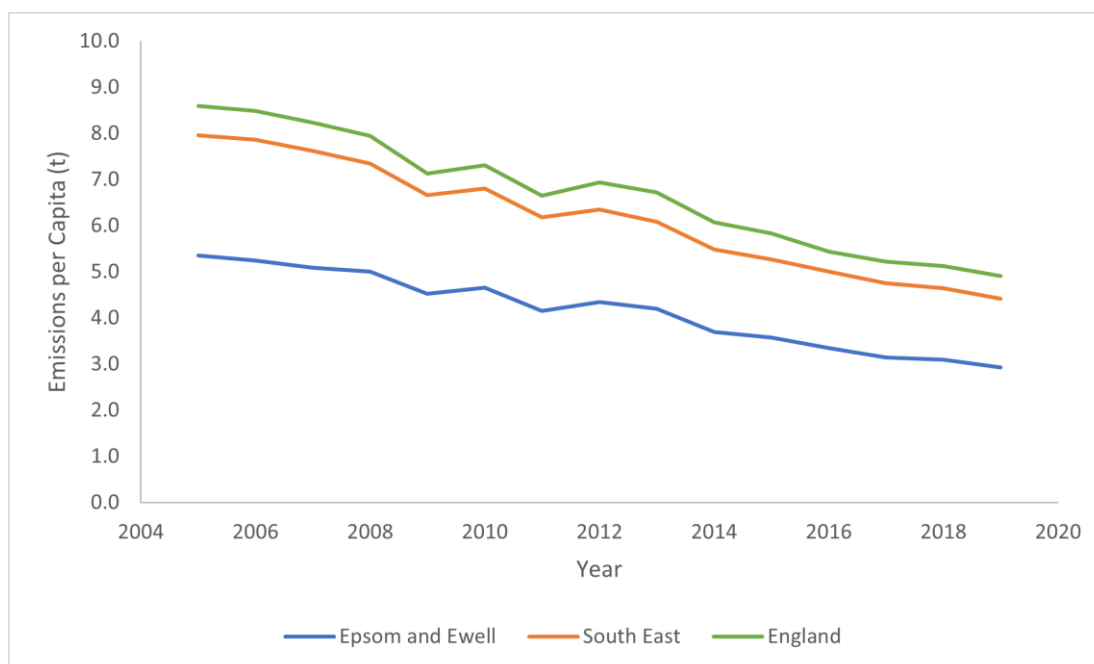


Figure 5.2 Trend in CO₂ emissions per capita (t) for Epsom and Ewell, the South East and England between 2005 and 2019

Potential effects of climate change

5.20 The UK Climate Projections (UKCP18) programme is a climate analysis tool that provides the most up-to-date assessment on potential future climatic changes in the UK based on climate model simulations¹². Projections can be downscaled to a regional level across the UK, allowing for specific evaluations of a selected area.

5.21 As highlighted by the research, the effects of climate change (under medium emissions scenarios 50th percentile) for the South East during the period 2020 to 2039 compared to the period 1981 to 2000 are likely to be as follows¹³:

- A central estimate of increase in annual mean temperatures of between 0.3°C and 1.5°C; and
- A central estimate of change in annual mean precipitation of 0 to +8% in winter and 0 to -5% in summer.

5.22 As a result of these changes, Epsom and Ewell may face increasing risks related to climate change, including:

- Effects on water resources from climate change.
- Reduction in availability of groundwater for extraction.
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain.
- Increased risk of flooding, including increased vulnerability to 1:100-year floods.
- A need to increase the capacity of wastewater treatment plants and sewers.

¹² Information about UKCP18 and key data can be accessed [here](#).

¹³ Met Office (2018): 'Land Projection Maps: Probabilistic Projections' can be accessed [here](#).

- A need to upgrade flood defences.
- Soil erosion due to flash flooding.
- Loss of species that are at the edge of their southerly distribution.
- Spread of species at the northern edge of their distribution.
- Increased demand for air-conditioning.
- Increased drought and flood related problems such as soil shrinkages and subsidence.
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

Summary of future baseline

5.23 CO₂ emissions per capita (t) in Epsom and Ewell may continue to decrease with the adoption of further energy efficiency measures, renewable energy production and new technologies such as Electric Vehicles (EVs). Nevertheless, increases in the built footprint of Epsom and Ewell would contribute to increases in the absolute levels of CO₂ emissions.

Key sustainability issues

5.24 The following key issues have been identified through the baseline review for this theme:

- The transport sector is a key challenge in terms of reducing CO₂ emissions, and therefore the new Local Plan should guide development towards the most accessible locations in Epsom and Ewell and encourage active transport infrastructure improvements where possible.
- The new Local Plan should also seek to maximise opportunities to support actions in tackling climate change. This could be through encouraging sustainable transport technologies, such as EVs.
- The South East is projected to experience an increase in annual mean temperature between 0.3°C and 1.5°C, an increase in mean winter precipitation between 0 to +8% and a decrease in mean summer precipitation between 0 to -5%. These changes have potential health implications for residents, including those in Epsom and Ewell.

SA objectives and appraisal questions

5.25 Based on the key issues discussed above, it is proposed that the SA should include the objectives and assessment questions in **Table 5.2** overleaf.

Table 5.2 Proposed objectives and assessment questions

SA objective	Assessment questions
6. Reduce the contribution to climate change made by activities within Epsom and Ewell	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?

6. Communities and health

Focus of theme

- Population and age structure
- Deprivation
- Community facilities
- Influences on health and wellbeing

Policy context

6.1 **Table 6.1** below presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key messages emerging from the review are then summarised after the table.

Table 6.1 Plans, policies and strategies

Document title	Year of publication
National	
National Planning Policy Framework (NPPF)	2021
A Green Future: Our 25 Year Plan to Improve the Environment	2018
Health Equity in England: The Marmot Review 10 Years On	2020
Healthy Lives, Healthy People: Our strategy for public health in England	2010
Public Health England: Spatial Planning for Health	2017
Public Health England: Healthy High Streets	2018
Equalities Act 2010	2010
Healthy and safe communities - Planning practice guidance	2019
Planning for Sport Guidance	2019
Space for people: Targeting action for woodland access	2017
Green Infrastructure Guidance	2009
Green Infrastructure and the Urban Fringe: Learning lessons from the Countryside in and Around Towns programme	2007
Noise Policy Statement for England (NPSE)	2010
Local	
Epsom and Ewell Core Strategy	2007
Epsom Town Centre Area Action Plan	2011
Epsom and Ewell Development Management Policies Document	2015
Epsom and Ewell Health and Wellbeing Strategy 2019 - 2023	2019

- 6.2 The new Local Plan will need to have regard to the NPPF, which overall seeks to retain and enhance access to community services and facilities, including health facilities, educational facilities, and open space. The NPPF recognises the benefits of a range of local provisions supporting community needs, including in rural areas. The Framework seeks to protect settlement and community identities. Furthermore, the NPPF recognises the benefits of creating cohesive communities, in safe environments where crime and the fear of crime do not undermine the quality of life of residents.
- 6.3 The NPPF recognises the role of development plans in helping to deliver access to high quality open spaces and opportunities for sport and physical activity which contribute to the health and wellbeing of communities. The health benefits of access to nature, green spaces and green infrastructure are further reiterated through the 25-year Environment Plan.
- 6.4 The Government's 25 Year Environment Plan highlights the health impacts of protecting and enhancing the natural environment. There is a focus on the physical and mental wellbeing benefits that the environment provides. One aim is to *"help people improve their health and wellbeing by using green spaces including through mental health services"*, whilst another is to *"encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas"*. The strategy highlights spatial planning approaches that can help deliver these aims, including planting one million trees in England's towns and cities by 2022 and delivering additional green infrastructure.
- 6.5 Health Equity in England: The Marmot Review 10 Years On (2020) has been produced by the Institute of Health Equity and commissioned by the Health Foundation to mark 10 years on from the landmark study Fair Society, Healthy Lives (The Marmot Review). The report highlights:
- People can expect to spend more of their lives in poor health.
 - Improvements to life expectancy have stalled, and declined for the poorest 10% of women; and
 - The health gap has grown between wealthy and deprived areas.
- 6.6 The 'Healthy Lives, Healthy People' White Paper outlines a radical shift in the way the government plans to tackle public health challenges. The plans set out in the White Paper put local communities at the heart of public health, ending central control and giving local government the freedom, responsibility and funding to innovate and develop their own ways of improving public health.
- 6.7 Public Health England (PHE) has a key role in shaping health policy and practice across the country. In 2017 the organisation published 'Spatial Planning for Health: An evidence resource for planning and designing healthier places'. The review provides guidance on the role of the built and natural environment in shaping health impacts. The review also explores the impacts of neighbourhood design, provision of housing, transport, and the natural environment on public health. Additionally, in 2018 PHE produced a 'Healthy High Streets' briefing which highlights how health inequalities can be addressed in the design of the built environment.

6.8 The Equality Act 2010 is a major piece of UK legislation which provides the framework to protect the rights of individuals against unlawful discrimination and to advance equal opportunities for all. Section 149 of the Equality Act sets out the Public Sector Equality Duty (PSED) to which local authorities are subject in carrying out all its functions. In this respect, those subject to the PSED, which includes all local authorities in the Peninsula STB, must have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations between people who share a protected characteristic and those who do not.

6.9 These are sometimes referred to as the three aims or arms of the PSED. The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

6.10 The Act describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others. The duty covers the following eight protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

6.11 Planning practice guidance 'Health and safe communities' sets out how to achieve healthy and inclusive communities, promote the benefits of estate regeneration, support the delivery of sufficient school places to meet the needs of existing and new communities, and support safe communities. Planning for Sport Guidance provides guidance on how the planning system can help to provide opportunities for all to take part in sport and be physically active. It does this by presenting twelve planning-for-sport principles.

6.12 Space for people provides the results of the Woodland Trust's latest analysis on the amount of access people in the UK have to woodland close to their homes. It also highlights the Trust's vision for increasing this. Natural England's Green Infrastructure Guidance provides advice on green infrastructure planning and delivery, which is increasingly recognised as an essential part of sustainable spatial planning. Also published by Natural England, 'Green Infrastructure and the Urban Fringe' highlights the Countryside In and Around Towns programme's achievements in demonstrating a vision for the urban fringe through engaging and influencing others to effect change and maximise the potential of this resource.

6.13 The Noise Policy Statement for England states that the implementation of transport planning systems aids in reducing environmental noise, which left unmanaged can cause an increased risk of health effects

6.14 At the local level, and in relation to the communities and health SA topic, Epsom and Ewell's Core Strategy includes the following policies:

- Policy CS 4 – Open Spaces and Green Infrastructure
- Policy CS 12 – Developer Contributions to Community Infrastructure
- Policy CS 13 – Community, Cultural and Built Sports Facilities
- Policy CS 14 – Epsom Town Centre
- Policy CS 15 – Role of Local Centres

6.15 In addition to this, the Epsom Town Centre Area Action Plan identifies the following policies in relation to the communities and health SA topic:

- Policy E6 – Leisure, Cultural and Community Facilities Provision
- Policy E9 – Public Realm
- Policy E10 – Improving Accessibility and Facilities for Cyclists

6.16 The Development Management Policies Document also identifies several policies relevant to the communities and health SA topic:

- DM6 – Open Space Provision
- DM7 – Footpath, Cycle and Bridleway Network
- DM12 – Housing Standards
- DM34 – New Social Infrastructure

6.17 The Epsom and Ewell Health and Wellbeing Strategy (2019 to 2023) aims to improve the health of residents and reduce inequalities so that all residents, especially those that are vulnerable, have better opportunities and a better quality of life. The Strategy sets out five priorities for the borough:

- Eating well, getting active and reducing alcohol usage.
- Living life to the full, irrespective of age.
- Supporting vulnerable residents to live well.
- Supporting the mental and emotional wellbeing of residents; and
- Supporting residents to stay connected.

Summary of current baseline

Population and age structure

6.18 According to data from the Census 2021, the population of Epsom and Ewell has increased by 7.7% from 75,100 in 2011 to 80,900 in 2021.¹⁴ This is higher than the overall increase for the South East (7.5%) and England (6.6%).

¹⁴ Office for National Statistics (2022): 'How the population changed in Epsom and Ewell: Census 2021', [online] available to access via [this link](#)

Nearby areas, Sutton and Reigate and Banstead, have seen their populations increase by around 10.2% and 9.5%, respectively, marking a higher level of growth than Epsom and Ewell, whilst Kingston upon Thames and Mole Valley have seen their populations increase by around 5% and 2.4%, respectively, marking a lower level of growth. Notably, as of 2021, Epsom and Ewell is the 12th most densely populated of the South East's 64 local authority areas.

- 6.19 In terms of age structure, approximately 19% of residents in Epsom and Ewell are aged under 15 years, 63% are aged 15 to 64 years, and 18% are aged 65 years and over. Between 2011 and 2021, Epsom and Ewell has seen an increase of 16.1% in people aged 65 years and over, an increase of 4.6% in people aged 15 to 64 years, and an increase of 11% in children aged under 15 years. In this respect, Epsom and Ewell is experiencing an ageing population, with many more residents likely to hit retirement age during the new Local Plan period, which might place extra burden on care facilities and health services.

Index of Multiple Deprivation

- 6.20 The Index of Multiple Deprivation (IMD)¹⁵ is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability, and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
 - 'Geographical Barriers': relating to the physical proximity of local services
 - 'Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.

¹⁵ DCLG (2019): Index of Multiple Deprivation, [online interactive map] available to access [here](#)

- ‘Indoors Living Environment’ measures the quality of housing.
 - ‘Outdoors Living Environment’ measures air quality and road traffic accidents.
 - Two supplementary indices (subsets of the Income deprivation domains), are also included:
 - **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
 - **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.
- 6.21 Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.
- 6.22 **Figure 6.1** overleaf illustrates the overall level of deprivation across Epsom and Ewell (organised by LSOA, based on data from 2019). This is relatively variable across the borough, although the most deprived areas are concentrated to the north of Epsom town centre. Specifically, this covers the area surrounding Blenheim High School (30% most deprived) and the area south of St Ebba’s Hospital in and around Parkview Way (40% most deprived). There is also a small area in the northwest of the borough, covering the area in and around Rowden Road, that is also relatively deprived (40% most deprived).
- 6.23 As the overall level of deprivation data is based on an average across the seven deprivation domains, it is also useful to explore the data for some of the individual domains. **Figure 6.2** overleaf illustrates the level of deprivation in Epsom and Ewell based on the ‘Barriers to Housing and Services’ domain. The area surrounding Blenheim High School is amongst the 10% most deprived for this domain, as is the area surrounding The Wells in the west of the borough. This implies that the physical and financial accessibility of housing and local services is poorest in these areas. The most deprived areas for this domain are concentrated in the western half of the borough, to the north, south and west of Epsom town centre. Conversely, the least deprived areas are concentrated in the north around Ewell, West Ewell and Stoneleigh.
- 6.24 **Figure 6.3** overleaf illustrates the level of deprivation in Epsom and Ewell based on the ‘Living Environment Deprivation’ domain. The most deprived areas for this domain are in and to the north of Epsom town centre. However, these areas are only amongst the 50% most deprived for this domain, which is less severe than the level of deprivation for the ‘Barriers to Housing and Services’ domain. This implies that the quality of the local environment is poorest in and to the north of Epsom town centre. Overall, only one area in the borough is in the 10% least deprived for this domain, which is the area east of Meadows West Park Hospital and around Manor Park.

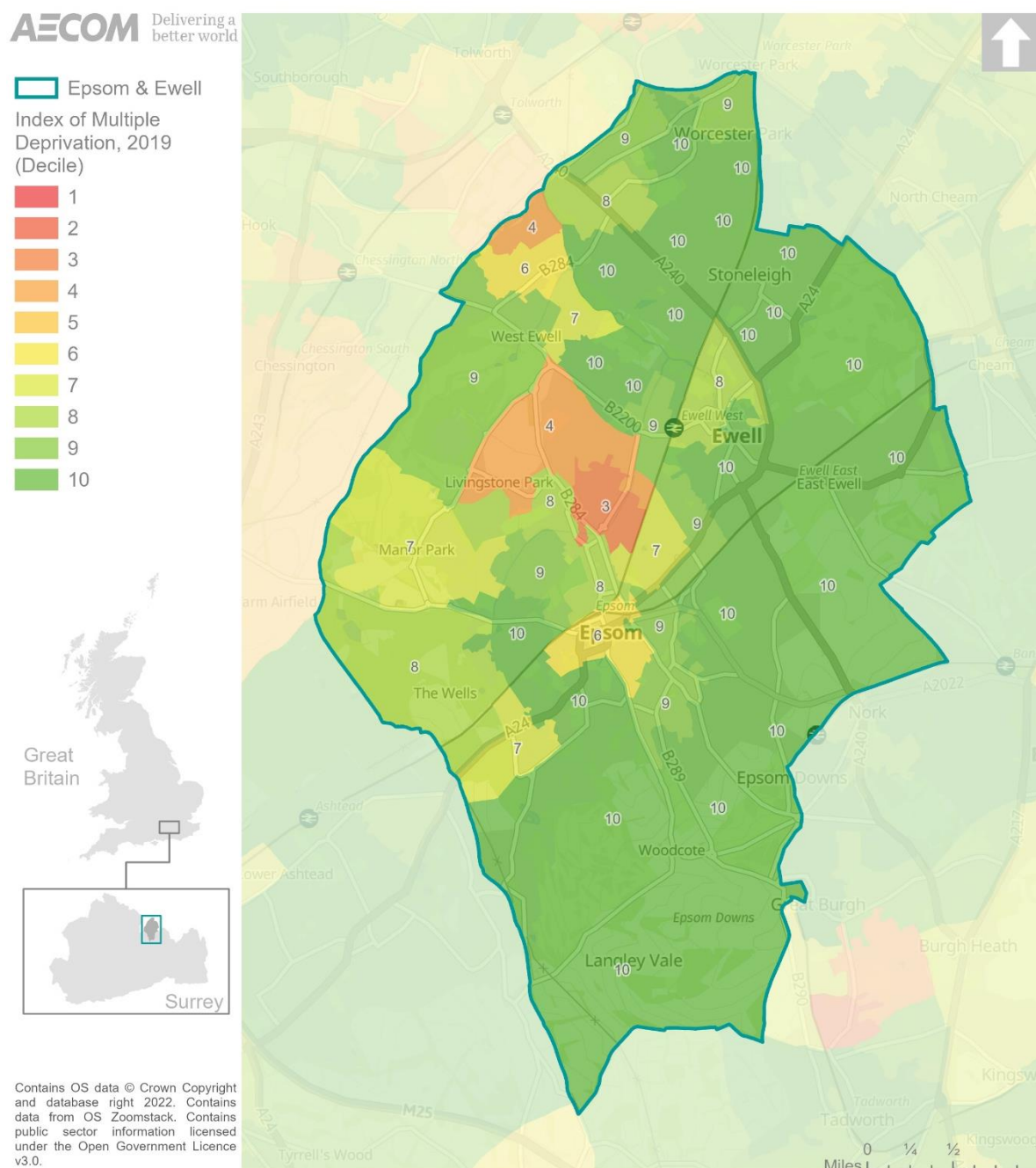


Figure 6.1 Overall deprivation level in Epsom and Ewell by LSOA

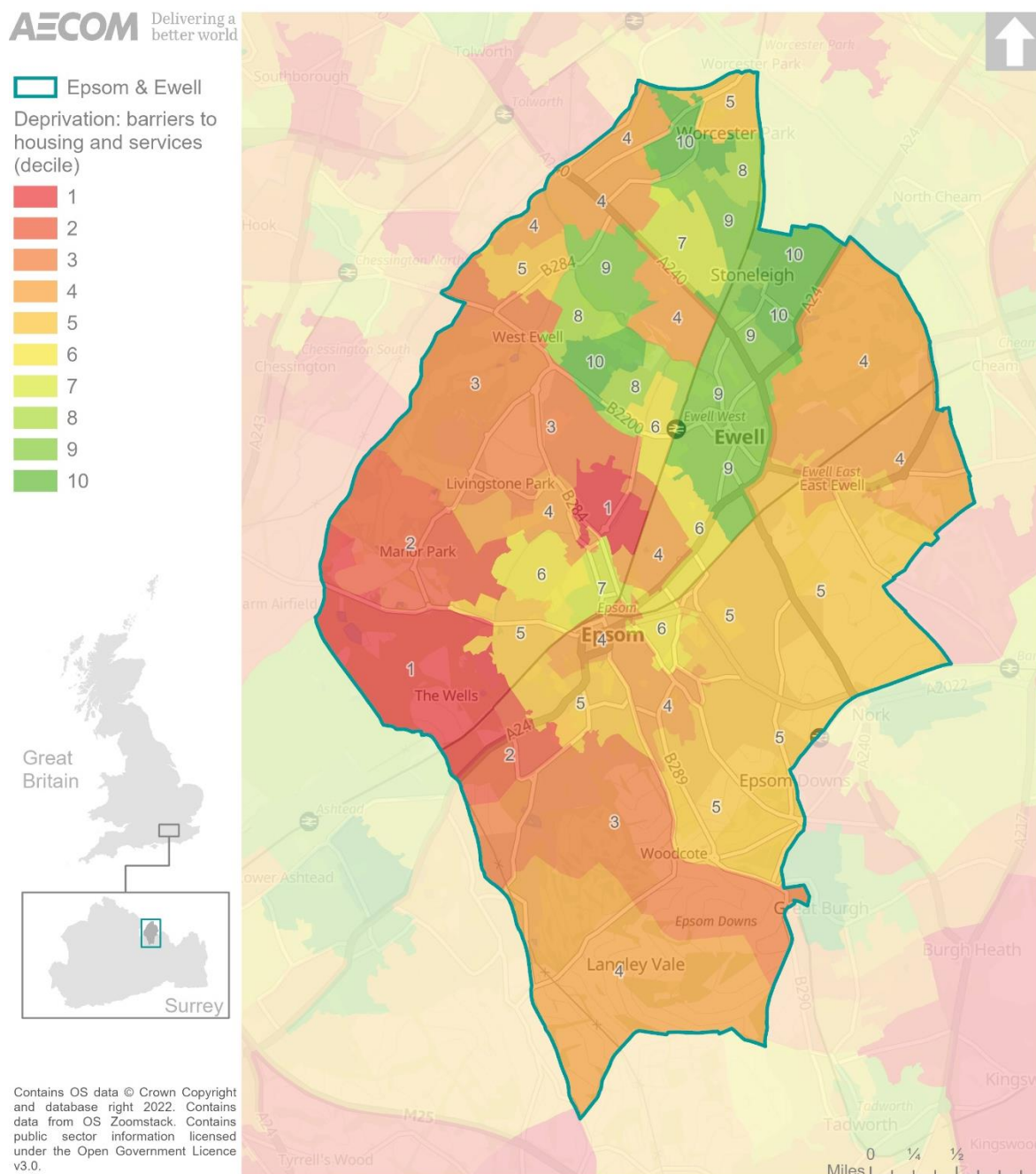


Figure 6.2 Deprivation in terms of the ‘Barriers to Housing and Services’ domain in Epsom and Ewell by LSOA

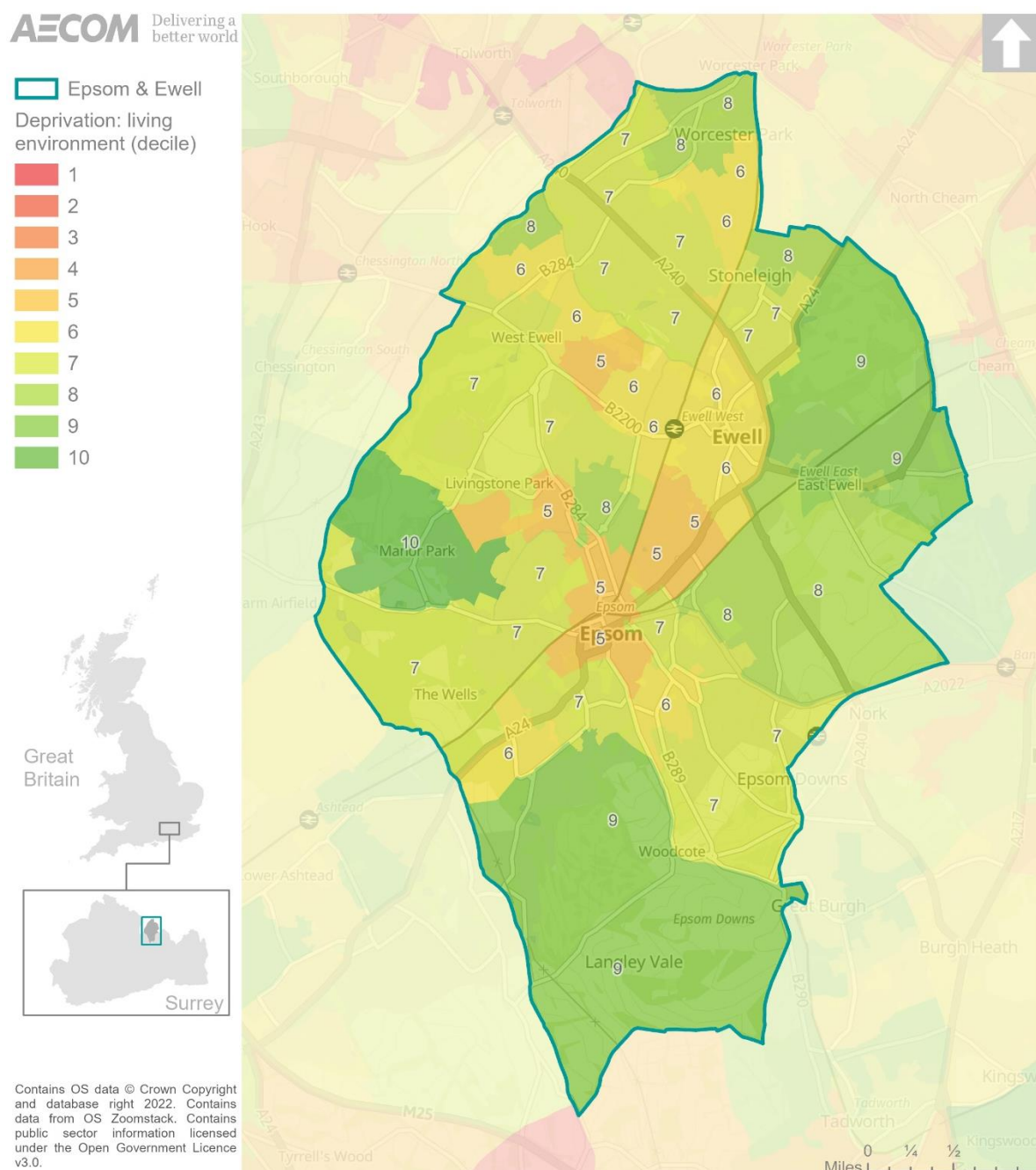


Figure 6.3 Deprivation in terms of the 'Living Environment Deprivation' domain in Epsom and Ewell by LSOA

6.25 Although Surrey is a largely affluent county, there are pockets of deprivation in a few of the larger towns, and this includes Epsom.¹⁶ The 25 most-deprived neighbourhoods in Surrey in 2015 were within the most deprived third of areas in the country. Moreover, foodbank usage across the county increased over 110% between 2013/14 and 2016/17, a far higher increase than other counties in the South East. In 2019, an estimated 23,000 children in Surrey were living in poverty, and Covid-19 is likely to have worsened this situation.

¹⁶ Surrey County Council (2022): 'Local Transport Plan 2022 to 2032', [online] available to access via [this link](#)

Services and facilities

6.26 Epsom and Ewell has a range of community facilities which serve the needs of the local community and play a vital role in supporting the area's vitality. This includes numerous venues, sport and leisure facilities¹⁷, including:

- Over 800 allotment plots located across 11 sites
- Bourne Hall, a community venue in the heart of Ewell Village.
- Epsom and Walton Downs, private land owned by Epsom Downs Racecourse and managed by the Conservators.
- Epsom Playhouse, a theatre.
- Ewell Court House, a Grade II listed house set in beautiful grounds.
- Nonsuch Park, a mansion house set in Nonsuch park.
- Rainbow Leisure Centre, including a swimming pool, gym and spa, as well as other sports facilities and classes; and
- The Harrier Centre, including athletics track, children's activities / soft play, community hall, and home of Gauntlett Boxing Club.

6.27 Based on a high-level review via Google Maps, GP surgeries in Epsom and Ewell are available in Epsom (Ashley Centre Surgery, Derby Medical Centre and The Integrated Care Partnership) and Ewell (Fitznells Manor Surgery, Fountain Practice and Spring Street Surgery). In addition to this, hospitals are available in Epsom (Epsom and Ewell Cottage Hospital, Epsom Day Surgery Limited, Epsom Hospital, The Old Cottage Hospital and West Park Hospital).

Green and blue infrastructure networks

6.28 Green and blue infrastructure provides space for recreation and relaxation, and access to nature has been evidenced to improve people's health and wellbeing, through encouraging healthy outdoor recreation and relaxation. In Epsom and Ewell, there is an extensive green and blue infrastructure network, and formal green space and strategic open space is shown in **Figure 6.4** overleaf. Notable green spaces include Epsom Downs, Nonsuch Park, LNRs Epsom Common, Hogsmill and Horton Country Park, and SSSIs Epsom and Ashted Commons and Stones Road Pond. Moreover, a significant area of the borough consists of metropolitan Green Belt land.

¹⁷ Epsom and Ewell (no date): 'Venues, sport and leisure facilities', [online] available to access via [this link](#)



Public Health Profile

6.29 Prepared by Public Health England, the Public Health Profiles are designed to act as a 'conversation starter', to help local government and health services understand their community's needs, so that they can work together to improve people's health and reduce health inequalities. The latest summary report for Epsom and Ewell was released in 2019¹⁸; key trends include:

¹⁸ Office for Health Improvement & Disparities (2019): 'Local Authority Health Profiles'. [online] available to access via [this link](#)

- The health of people in Epsom and Ewell is generally better than the average for England.
- Epsom and Ewell is one of the 20% least deprived unitary authorities in England, however about 6% of children are in low income families.
- Life expectancy for both men and women is higher than the average for England.
- In Year 6, 10% of children are classified as obese, better than the average for England.
- The under 75 mortality rates from cardiovascular diseases and under 75 mortality rates from cancer are better than the England averages.

Summary of future baseline

6.30 As the population of Epsom and Ewell continues to age, this could potentially negatively impact upon the future vitality of the local community in certain areas, whilst also placing additional pressures to existing services and facilities.

6.31 The long-term impacts of the Covid-19 pandemic are currently unclear. However, it is likely to impact (positively and negatively) on the vitality and viability of town centres, contribute to changes in demand for housing, employment land and retail, and on community provision in smaller centres.

Key sustainability issues

6.32 The following key issues have been identified through the baseline review for this theme:

- Epsom and Ewell is experiencing an ageing population, with many more residents likely to hit retirement age during the new Local Plan period. This could place extra burden on care facilities and health services.
- The population of Epsom and Ewell has increased by approximately 7.7% between 2011 and 2020 and stood at 81,003 residents in 2020. Future growth in the borough is likely to put additional strain on the capacity of local services and facilities.
- Epsom and Ewell has varying levels of deprivation, however the most deprived areas are concentrated in the western half of the borough. In terms of the IMD, the 'Barriers to Housing and Services' domain is a particular concern in this part of Epsom and Ewell.
- The services, facilities, and amenities within Epsom and Ewell supports community vitality and the quality of life of residents, with the availability of community assets essential for continued growth within the area.
- There are numerous important open spaces in Epsom and Ewell, including a significant area of Green Belt land.
- The recovery from the Covid-19 pandemic will have direct and indirect implications for Epsom and Ewell's residents in terms of their physical and mental wellbeing.

SA objectives and appraisal questions

6.33 Based on the key issues discussed above, it is proposed that the SA should include the objectives and assessment questions in **Table 6.2** overleaf.

Table 6.2 Proposed objectives and assessment questions

SA objective	Appraisal questions
7. Delivery of community infrastructure to meet the needs of all residents	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Enhance community infrastructure? • Meet the needs of a growing population? • Address the needs of all age groups and communities? • Maintain or enhance the quality of life of all residents? • Help remove barriers to activities and reduce social isolation?
8. Improve the health and wellbeing of residents	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Reduce the impacts of pollution on health? • Reduce health inequalities? • Enhance the provision of, and access to, open spaces and green and blue infrastructure provision? • Improve access to green spaces for recreation? • Encourage healthy lifestyles and active travel modes, including walking and cycling?

7. Economy and employment

Focus of theme

- Current and emerging economic sectors
- Employment, education, and skills
- Productivity and growth

Policy context

7.1 **Table 7.1** below presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key messages emerging from the review are then summarised after the table.

Table 7.1 Plans, policies and strategies reviewed

Document title	Year of publication
National	
National Planning Policy Framework (NPPF)	2021
Local	
The Coast to Capital Strategic Economic plan 2018 to 2030 – Build back stronger, smarter and greener	2020
The Coast to Capital Strategic Economic plan 2018 to 2030 – Gatwick 360°	2018
Surrey's Economic Future	2020
Epsom and Ewell Core Strategy	2007
Epsom Town Centre Area Action Plan	2011
Epsom and Ewell Development Management Policies Document	2015
Epsom and Ewell Local Plan Spatial Economic Growth Strategy	2020
Epsom and Ewell Economic Development Strategy	2016
Epsom and Ewell Retail and Commercial Leisure Needs Assessment Update	2021

7.2 Key messages from the NPPF include:

- Planning policies should help build a strong, responsive, and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation, and improved productivity; and by identifying and coordinating the provision of infrastructure.
- Local Plans should:
 - Encourage sustainable economic growth within their clear economic vision and strategy.
 - Set criteria and identify sites for local investment to match the community needs.

- Address investment barriers such as inadequate infrastructure, services/housing or poor environment.
 - Incorporate flexibility to account for unanticipated circumstances, allow new working practices and enable rapid responses to economic changes; and
 - Ensure that there is a ‘sufficient choice of school places’ and taking a ‘proactive, positive and collaborative approach’ to bringing forward ‘development that will widen choice in education’.
- 7.3 Build back stronger, smarter and greener, which forms part of the Coast to Capital Strategic Economic Plan 2018 to 2030, sets out a case for a series of place based, transformational infrastructure projects for the Local Enterprise Partnership (LEP) area that will speed recovery and accelerate growth. These will address long-term productivity challenges in the economy as well as the significant short-term impacts of the Coronavirus pandemic.
- 7.4 Gatwick 360°, which also forms part of the Coast to Capital Strategic Economic Plan 2018 to 2030, identifies eight economic priorities for the LEP area, which are as follows:
1. Deliver prosperous urban centres.
 2. Develop business infrastructure and support.
 3. Invest in sustainable growth.
 4. Create skills for the future.
 5. Pioneer innovation in core strengths.
 6. Promote better transport and mobility.
 7. Improve digital network capability; and
 8. Build a strong national and international profile.
- 7.5 At the county level, Surrey’s Economic Future, Forward to 2030: Our Economic Strategy Statement, highlights the influence that Surrey has on the wider sub-regional and UK economy and sets out Surrey County Council’s priorities to build on these economic strengths, supporting a resilient, productive and high-value economy that contributes to growth across the UK.
- 7.6 At the local level, and in relation to the economy and employment SA topic, Epsom and Ewell’s Core Strategy includes the following policies:
- Policy CS 11 – Employment Provision
- 7.7 In addition to this, the Epsom Town Centre Area Action Plan identifies the following policies in relation to the economy and employment SA topic:
- Policy E3 – Town Centre Retail Capacity
 - Policy E4 – Town Centre Primary Shopping Area and Primary and Secondary Retail Frontages
 - Policy E5 – Town Centre Employment Floorspace Provision
 - Policy E14 – Depot Road and Upper High Street
 - Policy E15 – The Utilities Site

- Policy E16 – Epsom Station Site

7.8 The Development Management Policies Document also identifies several policies relevant to the economy and employment SA topic:

- DM24 – Employment Uses Outside of Existing Employment Policy Areas
- DM25 – Development of Employment Premises
- DM26 – Equestrian-Related Development in the Green Belt
- DM27 – Working from Home
- DM28 – Existing Retail Centres (Out of Epsom Town Centre)
- DM29 – Major New Retail Developments
- DM30 – Existing Out of Centre Retail Facilities
- DM31 – Safeguarding Small-Scale Retail Provision
- DM33 – Visitor Accommodation

7.9 Epsom and Ewell have commissioned a Housing and Economic Development Needs Assessment (HEDNA) to analyse housing and economic development needs over the plan period which will inform the Local Plan. This document will supersede the Epsom and Ewell Local Plan Spatial Economic Growth Strategy. Nevertheless, at present, the Spatial Economic Growth Strategy provides guidance to the Local Plan on the provision of employment land necessary to meet the economic growth opportunities and options faced by the borough. The strategy has been prepared to provide:

- a. An overview of the challenges for achieving economic growth within the borough.
- b. The strategic context and emerging ambitions for the future of the borough and wider sub-region.
- c. Opportunities for securing the future prosperity of the borough.
- d. Strategic objectives for delivery of the Spatial Economic Development Strategy.
- e. Priority interventions recommended for bringing forward the key spatial economic growth opportunities; and
- f. Supporting measures to assure longer term balanced and sustainable economic growth.

7.10 Adopted in 2016, Epsom and Ewell's Economic Development Strategy provides a framework for delivering sustained prosperity, setting out the Council's ambitions, key priorities and related actions for economic development across the borough. It builds upon Local Plan policies that have consistently set out to create a healthy environment for economic development to take place.

7.11 Epsom and Ewell's Retail and Commercial Leisure Needs Assessment Update, carried out in 2021, provides an update to the Retail and Commercial Leisure Needs Assessment (2020). This update was deemed necessary as the 2020 Study was published just before the start of the Covid-19 pandemic, which has had a significant impact on retail and commercial leisure needs. Moreover, since the release of the 2020 Study, the Government have introduced sweeping

changes to planning legislation in respect of the Use Classes Order and permitted development, with direct impacts on town centres.

- 7.12 The purpose of the 2020 Study was to provide the Council with an up-to-date and comprehensive understanding of the current health and performance of the Borough's retail and leisure offer, to set out current and future needs for additional floorspace to the period 2032, and to inform the preparation of a robust retail and town centre strategy. The 2021 Update sets out the impact of change and details robust policy recommendations in response.

Summary of current baseline

Employment and economy

- 7.13 Surrey has a very strong economy, contributing over £40 billion per year to the national economy, through above average levels of output per hour worked.¹⁹ A key contributor to this economic success is Surrey's unique strategic location, bordering the two major international airports of Heathrow and Gatwick, close to London and other economically successful areas such as the Thames Valley and M3 corridor, with good access to the south coast, nationally significant roads routing through the county, and strong rail links to London.
- 7.14 However, 'Surrey's Economic Future' highlights that there are five big challenges that will impact on Surrey's economy, which are:
- Consequences of innovation, including the risks of automation, which are generally greatest in relatively low-skilled occupations.
 - Demographic change, particularly related to Surrey's aging population and a rate of population growth below the national average.
 - Improving connectivity for the next generation, including transport connectivity and digital connectivity to homes and businesses.
 - Economic disparities and supporting opportunities for everyone, especially in a relatively expensive county that is unaffordable for many people; and
 - Environmental resilience, including a commitment to net zero carbon emissions by 2050, with businesses leading the way in carbon reduction.
- 7.15 The necessity for a large proportion of the population to work remotely during the Covid-19 pandemic has the potential to drive a considerable acceleration in the trend in flexible working practices. For Epsom and Ewell, this could mean higher levels of inward migration from London.
- 7.16 Gatwick 360° highlights the contribution that different towns and areas make to the LEP area's economic worth of £50.7 billion gross value added (GVA). Epsom and Ewell contributes approximately £2 billion to this total, making it the second smallest contributor. The document also highlights that residents in Epsom and Ewell can earn more by commuting than they can locally.
- 7.17 According to Gatwick 360°, the sector specialisations in Epsom and Ewell are as follows:

¹⁹ Surrey County Council (2022): 'Local Transport Plan 2022 to 2032', [online] available to access via [this link](#)

- Computer Software Programming and Publishing.
- Insurance and Financial Services; and
- Communications and Navigation Equipment Manufacturing.

7.18 Longmead Industrial Estate and Kiln Lane Industrial Estate form the key strategic employment site in Epsom and Ewell. These sites are in the centre of the borough, adjacent to one another, but separated by the rail line running from Epsom station to central London (see **Figure 7.1** overleaf). As such, these two sites are treated as one strategic employment site, consisting of large footprint, single storey shed and warehouse developments.

7.19 The strategic employment site performs an important economic function for the borough, with high occupation rates and a strong concentration of light industrial, distribution, manufacturing and service businesses.

7.20 Also shown in **Figure 7.1** overleaf are the range of centres within Epsom and Ewell. Epsom town centre forms the primary centre of the borough and is the main destination for high street and specialist retailing, with regular street markets and a wide range of restaurants and cafes. Epsom town centre also hosts festivals and events and is a hub for cultural and civic life, with good access to parks and open spaces including Rosebury Park and Mounthill Gardens.

7.21 Secondary centres include Ewell Village and Stoneleigh Broadway. These secondary centres are both directly served by dedicated railway stations. There are also numerous local centres within the borough, which include a range of shops of a local nature, and whilst they do not have dedicated railway stations, they are still highly accessible due to their location on key movement corridors that are well served by bus routes. The local centres include:

- Castle Parade, Ewell.
- Chessington Road/ Green Lanes.
- Chessington Road/ Plough Road.
- Chessington Road/ Ruxley Lane.
- Horton Local Centre.
- Kingston Road/ Bradford Drive.
- Kingston Road/ Ruxley Lane.
- Manor Green Road, Epsom.
- Poole Road, Epsom.
- Pound Lane, Epsom.
- Vale Road, Worcester Park.
- Waterloo Road, Epsom; and
- Windmill Lane/ East Street, Epsom.

7.22 Shopping parades are also shown in **Figure 7.1** overleaf, which perform important socio-economic functions across the borough. These shops have a smaller, immediate catchment, and are often found on the urban fringe serving

small communities. Although some of these parades are located on bus routes, they are generally not considered to be well connected.

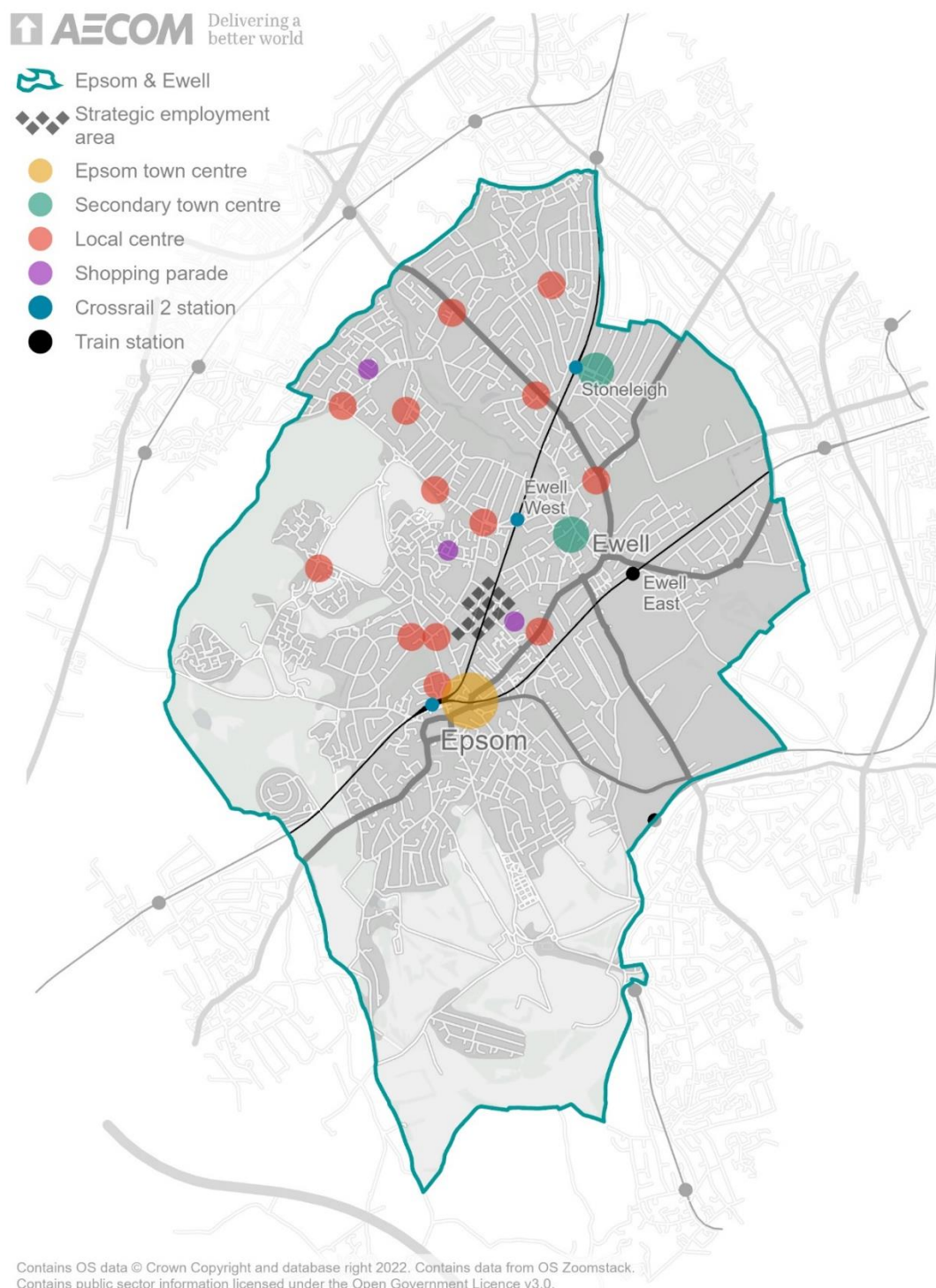


Figure 7.1 Range of centres and strategic employment site in Epsom and Ewell

Education and skills

7.23 Regarding educational establishments, there are numerous schools in Epsom and Ewell, including:

- Blenheim High School
- Epsom Primary and Nursery School

- Ewell Castle School (independent)
- Ewell Grove Primary and Nursery School
- Glyn School
- Kingswood House School (independent)
- Little Downsend Epsom (independent)
- Rosebery School
- Southfield Park Primary School
- Stamford Green Primary School and Nursery
- St Christopher's School Trust Ltd (independent)
- St Clement's Catholic Primary School
- St Joseph's Catholic Primary School
- St Martin's CofE Aided Junior School
- St Martin's CofE Aided Infant School
- Wallace Fields Junior School

7.24 In terms of higher / further education establishments, there is the North East Surrey college of Technology (NESCOT) located on Reigate Road. In addition to this, the University for the Creative Arts and Laine Theatre Arts both have a campus in Epsom town centre.

7.25 Surrey has a highly skilled workforce, and 51.8% of Surrey's working age population hold a degree-level qualification, more than the South East and national averages. Surrey is also home to two world class universities, the University of Surrey and Royal Holloway, University of London.

7.26 Notably, Gatwick 360° highlights that over 50% of the 16- to 64-year-old population in Epsom and Ewell has a NVQ4+ qualification (based on data from 2016). This marks the highest percentage in the LEP area.

Summary of future baseline

7.27 As the requirements of the working population continue to change, particularly in response to the Covid-19 pandemic, there is likely to be a requirement for adaptable dwellings which can accommodate more flexible working practices. This is echoed within the place making principles outlined in the UK Government's proposed planning reforms (see the [Planning for the Future White Paper](#), for more information).

7.28 The regeneration of redundant or underutilised brownfield land across Epsom and Ewell (including the densification of existing areas) will help to support local employment opportunities and reduce the need to commute to London.

7.29 A greater focus on the functionality and purpose of local centres is likely to be required in response to the changing habits of consumers as they continue to shop online. Maintaining the quality and supporting the retail offer within local centres is key, alongside encouraging opportunities for diversification.

Key sustainability issues

7.30 The following key issues have been identified through the baseline review for this theme:

- The five big challenges for Surrey's economy are the consequences of innovation, demographic change, improving connectivity for the next generation, economic disparities and supporting opportunities for everyone, and environmental resilience.
- Longmead Industrial Estate and Kiln Lane Industrial Estate form the key strategic employment site in Epsom and Ewell, which the new Local Plan should seek to protect due to its strong economic contribution to the borough.
- Epsom town centre and the secondary town centres of Ewell Village and Stoneleigh Broadway are well served, as are the local centres, although there is potential for greater connectivity to the shopping parades, which the new Local Plan could seek to address. A greater focus on the functionality and purpose of town and local centres is also likely to be required in response to the changing habits of consumers.
- Surrey has a highly skilled workforce, and 51.8% of Surrey's working age population hold a degree-level qualification, more than the South East and national averages. The University for the Creative Arts and Laine Theatre Arts both have a campus in Epsom town centre.
- Notably, the Council are currently prepared a Housing and Economic Development Needs Assessment (HEDNA), which will analyse economic development needs over the plan period, informing the Local Plan.

SA objectives and appraisal questions

7.31 Based on the key issues discussed above, it is proposed that the SA should include the objectives and assessment questions in **Table 7.2** below.

Table 7.2 Proposed objectives and assessment questions

SA objective	Appraisal questions
9. Support sustainable economic development in Epsom and Ewell	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Meet local employment land requirements? • Support traditional and emerging sectors of Epsom and Ewell's economy? • Enhance the vitality of Epsom and Ewell's local centres? • Improve accessibility to employment opportunities? • Enhance training and educational opportunities?

8. Heritage and the historic environment

Focus of topic

- Designated and non-designated heritage assets
- Setting, special qualities and significance of heritage assets
- Locally important heritage assets
- Archaeological resources
- Historic character of Epsom and Ewell

Policy context

8.1 **Table 8.1** below presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key messages emerging from the review are then summarised after the table.

Table 8.1 Plans, policies and strategies

Document title	Year of publication
International	
<u>UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage</u>	1972
National	
<u>National Planning Policy Framework (NPPF)</u>	2021
<u>Planning Practice Guidance</u>	2019
<u>Ancient Monuments and Archaeological Areas Act</u>	1979
<u>Planning (Listed Buildings and Conservation Areas) Act</u>	1990
<u>Historic England Good Practice Advice in Planning 1: The Historic Environment in Local Plans</u>	2015
<u>Historic England Advice Note 1: Conservation Area Appraisal Designation and Management (second edition)</u>	2019
<u>Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets</u>	2019
<u>Historic England Advice Note 8: Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)</u>	2016
<u>Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans</u>	2015
<u>Historic England Good Practice Advice in Planning: 3 The Setting of Heritage Assets (second edition)</u>	2017
<u>Historic England: Conservation Principles, Policies and Guidance</u>	2008
<u>National Model Design Code</u>	2021
<u>A Green Future: Our 25 Year Plan to Improve the Environment</u>	2018
<u>The National Design Guide</u>	2019

Document title	Year of publication
Local	
Epsom and Ewell Core Strategy	2007
Epsom Town Centre Area Action Plan	2011
Epsom and Ewell Development Management Policies Document	2015

- 8.2 The new Local Plan policies will need to have regard to the UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage. It notes that the threats to cultural and natural heritage are increasing through destruction, decay and shifting social and economic conditions.
- 8.3 Chapter 16 in the NPPF is dedicated to conserving and enhancing the historic environment. The NPPF states the following:
- Heritage assets range from sites and buildings of local historic value to those of the highest significance. They are irreplaceable resources and should be conserved appropriately to ensure their continued contribution to the quality of life of existing and future generations.
 - Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay, or other threats.
 - Local planning authorities should identify and assess the significance of any heritage asset that could be affected by a proposal.
 - When considering the impact of a proposed development on an asset's significance, great weight should be given to conservation irrespective of whether potential harm leads to less than substantial harm, substantial harm, or total loss.
- 8.4 The messages in the NPPF are supported by the National Planning Practice Guidance, including the key message that local planning authorities should set out a positive strategy for the conservation and enjoyment of the historic environment in their local plans, recognising that conservation is not a passive exercise and there are specific opportunities for the conservation and enhancement of heritage assets.
- 8.5 The Ancient Monuments and Archaeological Areas Act (1979) allows for the investigation, presentation and recording of matters of archaeological or historical interest and makes provision for the regulation of operations or activities which may affect ancient monuments and archaeological areas.
- 8.6 The Planning (Listed Buildings and Conservation Areas) Act (1990) protects listed buildings and conservation areas. It enforces controls on buildings and areas of special architectural or historical interest.
- 8.7 Historic England is the statutory body that helps people care for, enjoy, and celebrate England's spectacular historic environment. Guidance and advice notes provide essential information for local planning authorities, neighbourhood groups, developers, consultants, landowners, and other interested parties on historic environment considerations, and are regularly reviewed and updated considering legislative changes. The following guidance

and advice notes are particularly relevant and should be read in conjunction with the others:

- Historic England Good Practice Advice in Planning 1: The Historic Environment in Local Plans assists local authorities, planning and other consultants, owners, applicants, and other interested parties in implementing the historic environment policies contained within the NPPF.
- Historic England Advice Note 1: Conservation Area Designation, Appraisal and Management highlights various methods to manage change whilst allowing for the conservation and enhancement of historic areas. The advice note emphasises the importance of understanding the various types of architectural and historic interest that underpin designations and recognising the importance of implementing controls to positively contribute to the significance and value of conservation areas.
- Historic England Advice Note 12: Statements of Heritage Significance offers guidance on how to describe heritage significance to help local planning authorities reach a verdict on impacts of proposals to heritage assets. Understanding the significance of heritage assets before development proposals are suggested enables owners and applicants to receive effective, consistent, and timely decisions.
- Historic England Advice Note 8: Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA) provides support to all stakeholders involved in assessing the effects of certain plans on the historic environment. It offers guidance on how to appropriately consider heritage during each stage of the SA/SEA process and establishes the basis for robust and comprehensive assessments.
- Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans offers advice to those involved in the process of identifying potential sites for development in order to help ensure the historic environment plays a positive role in allocation and evidence. In addition, the document details a number of steps to make sure that heritage considerations are fully integrated in any site selection methodology.
- Historic Environment Good Practice Advice in Planning: 3 The Setting of Heritage Assets offers advice on understanding setting, how it may contribute to the significance of heritage assets and allow that significance to be appreciated. It also offers an insight into how different views and interpretations contribute to setting. Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting.
- Historic England: Conservation Principles, Policies and Guidance ensures consistency in the approach taken by Historic England when carrying out its governmental statutory advisor role. It addresses the challenges of modernising heritage protection by proposing an integrated approach to making decisions.

8.8 The National Model Design Code states that schemes should respect the historic assets of a site and its surroundings and make use of existing structures where possible.

- 8.9 A Green Future: Our 25 Year Plan to Improve the Environment and the National Design Guide both recognise and reiterate the role of the historic environment in supporting healthy and thriving ecosystems, landscapes, and cultural values. Of note is Chapter 2 'Recovering nature and enhancing the beauty of landscapes' in the 25 Year Plan.
- 8.10 At the local level, and in relation to the heritage and historic environment SA topic, Epsom and Ewell's Core Strategy includes the following policies:
- Policy CS 5 – Conserving and Enhancing the Quality of the Built Environment
- 8.11 In addition to this, the Epsom Town Centre Area Action Plan identifies the following policies in relation to the heritage and historic environment SA topic:
- Policy E7 – Town Centre Building Height
 - Policy E9 – Public Realm
 - Policy E17 – Other Opportunity Sites
- 8.12 The Development Management Policies Document also identifies several policies relevant to the heritage and historic environment SA topic:
- DM8 – Heritage Assets
 - DM9 – Townscape Character and Local Distinctiveness
 - DM13 – Building Heights
 - DM14 – Shopfront Design

Summary of current baseline

Historic background of Epsom and Ewell

- 8.13 Epsom and Ewell has a rich historic environment, which is largely due to its geology and position on the spring line on the edge of the London clay and North Downs chalk. It was these springs which attracted prehistoric inhabitants to the borough, a Roman settlement and during the 17th century the establishment of Epsom as a spa town. The spa, in addition to the horse racing on Epsom Downs, made Epsom a popular place, and as a result, numerous large grand houses were built during and after this period. Later periods of growth included the introduction of the railways and inter-war expansion of the borough.

Designated heritage assets and areas

- 8.14 The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. As shown in **Figure 8.1** overleaf, Epsom and Ewell has numerous designated heritage assets and features, including listed buildings, scheduled monuments, registered parks and gardens, and conservation areas.

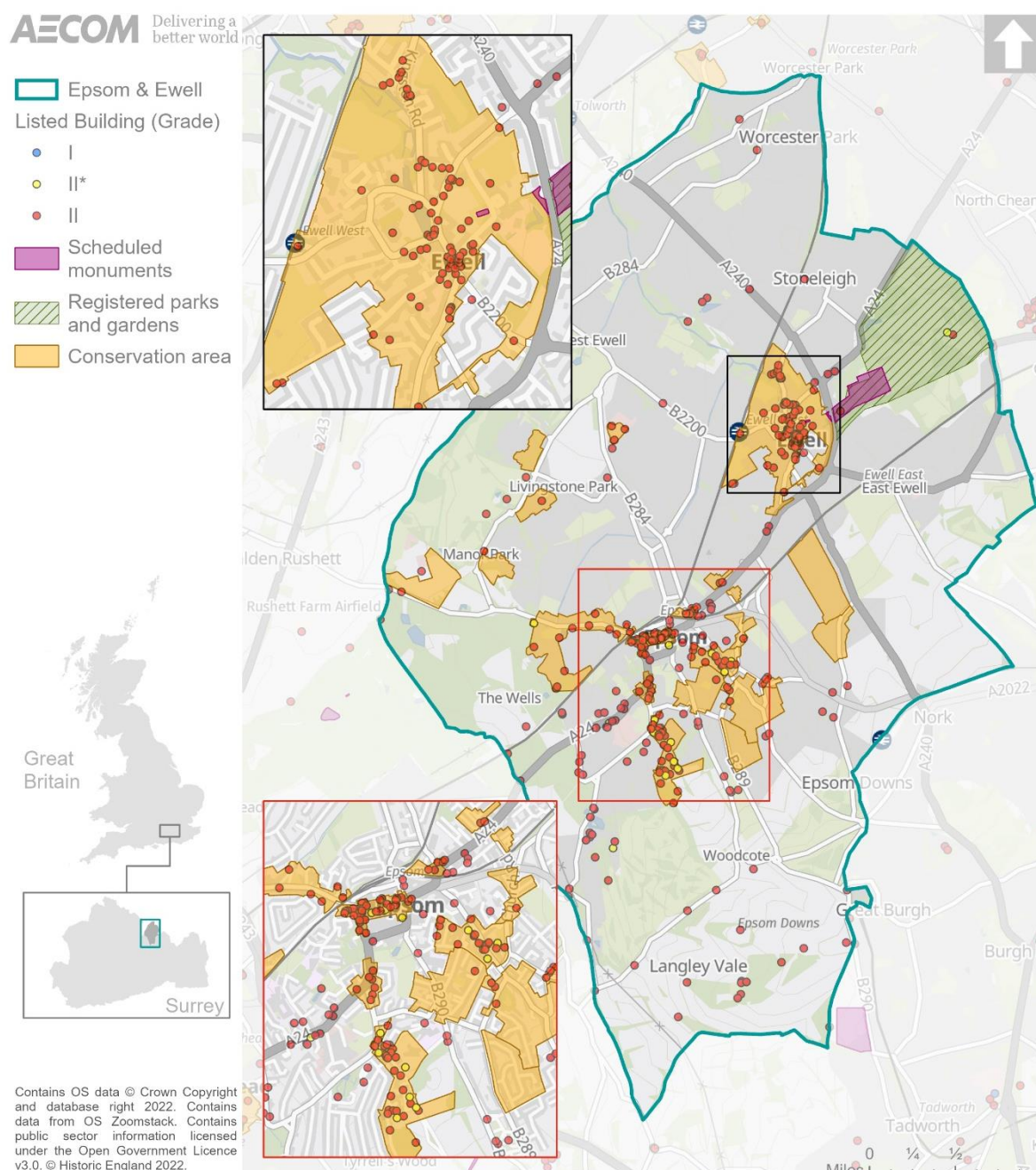


Figure 8.1 Designated heritage assets and features in Epsom and Ewell

Listed buildings

8.15 Listed building are nationally designated buildings which are protected through the Planning (Listed Buildings and Conservation Areas) Act. A structure can be designated for its architectural and/or historical interest. Furthermore, a structure can be listed to ensure its preservation; for its architectural and/or historic contribution, for a specific feature on the structure, or for the land within the curtilage of the structure.

8.16 According to the National Heritage List for England compiled by Historic England, there are 321 listed buildings in Epsom and Ewell. This includes 17 Grade II* listed buildings and 304 Grade II listed buildings (see **Figure 8.1** above). During the next stages of the SA process, the National Heritage List for

England shall be reviewed in greater detail to determine whether any heritage assets are likely to be impacted by the proposals within the new Local Plan.

Scheduled monuments

8.17 The Ancient Monuments and Archaeological Areas Act (1979) allows the investigation, presentation and recording of matters of archaeological or historical interest and makes provision for the regulation of operations or activities which may affect ancient monuments and archaeological areas. Scheduled monuments are nationally designated sites that are protected under the Ancient Monuments and Archaeological Areas Act. According to the National Heritage List for England, there are two scheduled monuments in Epsom and Ewell (see **Figure 8.1** above), which are:

- Nonsuch palace, its formal gardens and associated remains, and Cuddington medieval settlement
- Tower of old church, Ewell

Registered parks and gardens

8.18 Historic England's 'Register of Parks and Gardens of Special Historic Interest in England', established in 1983, currently identifies over 1,600 sites assessed to be of significance. There is one Grade II listed park and garden in Epsom and Ewell (see **Figure 8.1** above), which is Nonsuch Park, a mid and late C18 gardens and parkland surrounding a country house. The mansion was, in the mid C18, the home of Thomas Whately, author of *Observations on Modern Gardening*, published 1770, who was responsible for making improvements to the gardens. The site includes the site of the Tudor palace of Nonsuch.

Conservation areas

8.19 Conservation areas are designated because of their special architectural and historic interest. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England. There are 21 conservation areas in Epsom and Ewell (see **Figure 8.1** above), which are:

- Adelphi Road
- Burgh Heath Road
- Chalk Lane
- Church Street
- College Road
- Downs Road Estate
- Epsom Town Centre
- Ewell Downs Road / The Green
- Ewell Village
- Higher Green / Longdown Lane
- Horton (part of the 'Hospital Cluster')

- Long Grove (part of the 'Hospital Cluster')
- The Manor (part of the 'Hospital Cluster')
- St Ebba's (part of the 'Hospital Cluster')
- West Park (part of the 'Hospital Cluster')
- Lintons Lane
- Pikes Hill
- Providence Place
- Stamford Green
- Woodcote
- Worple Road

8.20 All the conservation areas have conservation area maps and appraisals, which are available to access on Epsom and Ewell Borough Council's website²².

Locally important heritage features

8.21 Not all of Epsom and Ewell's environment features are subject to statutory designations, with non-designated features contributing a large part of what people encounter on a day-to-day basis. Although not designated, many buildings and areas are of historic interest and are important to local communities, including open spaces and key distinctive buildings.

8.22 The Epsom and Ewell Historic Environmental Record (HER) identifies important and distinctive structures or features that positively contribute to the local sense of place and distinctiveness of Epsom and Ewell and its archaeological recourse. Following a high-level review of the HER via the Heritage Gateway, that there are 802 records within Epsom and Ewell. During the next stages of the SA process and subject to the availability of information, the HER will be reviewed in greater detail to determine the potential impacts to non-designated heritage features resulting from the provisions within the new Local Plan.

8.23 EEBC has designated over 70 buildings or structures which are valued for their contribution to the local scene, or for their local historic associations, but are not considered to be of national importance²³. These locally listed buildings, alongside archaeological sites, are shown in **Figure 8.2** overleaf.

²² Epsom and Ewell Borough Council (no date): 'Conservation Areas', [online] available to access via [this link](#)

²³ Epsom and Ewell Borough Council (no date): 'Locally listed heritage assets', [online] available to access via [this link](#)

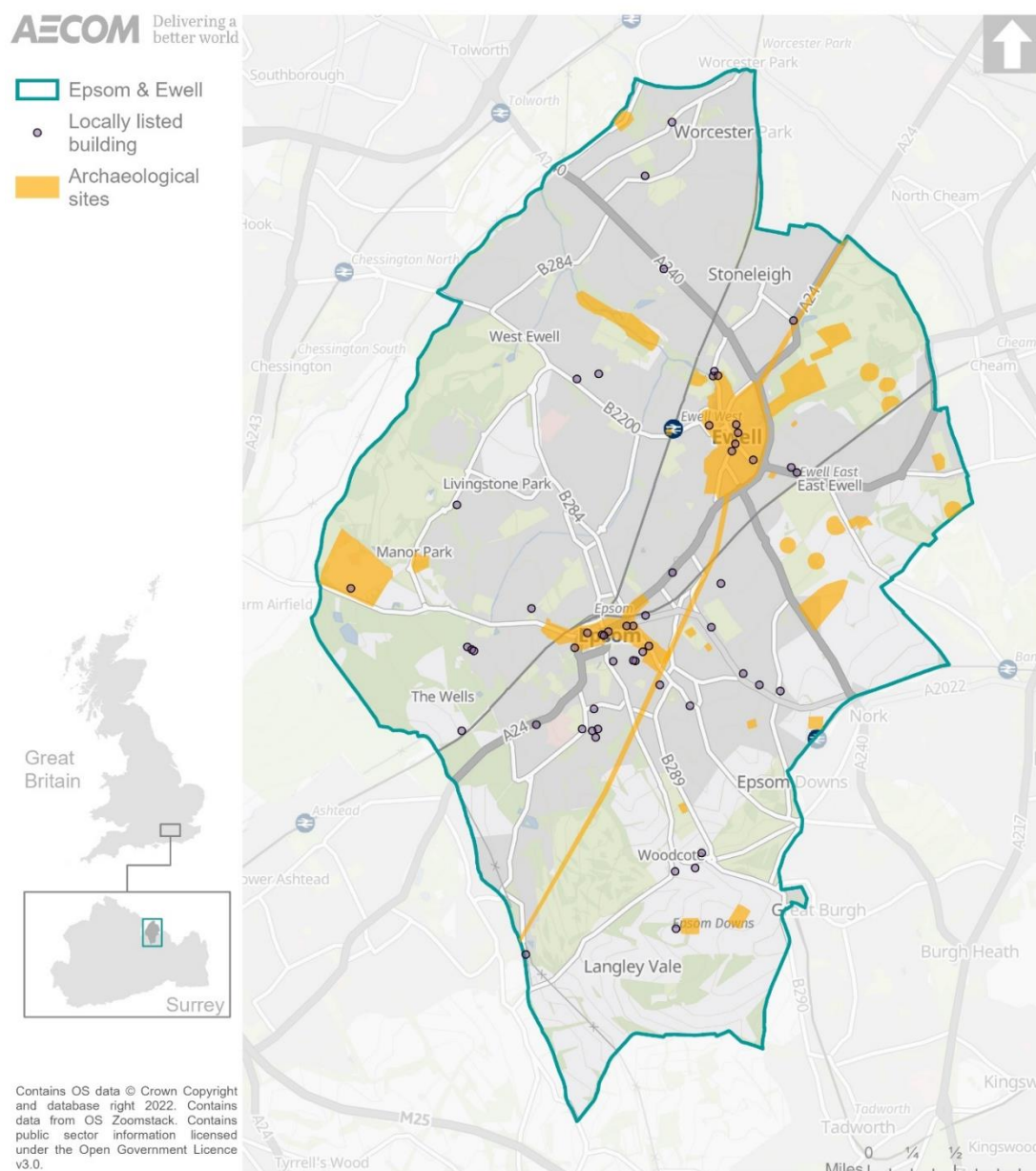


Figure 8.2 Locally listed buildings and archaeological sites

Heritage at risk

- 8.24 Since 2008, Historic England has produced an annual Heritage at Risk Register which highlights historic environment assets that are seen to be 'at risk'. According to the 2021 Heritage at Risk Register for the South East, there are three heritage assets at risk within Epsom and Ewell, which are Epsom Town Centre, Ewell Village and Horton Conservation Areas. Epsom Town Centre and Horton Conservation Areas are in 'poor' condition, whereas Ewell Village Conservation Area is in 'very bad' condition according to the Register.
- 8.25 During the next stages of the SA process, the Register shall be reviewed in greater detail to determine whether any heritage features which are currently at risk are likely to be impacted by the proposals within the new Local Plan. It is important to recognise that Heritage at Risk registers for areas outside of London do not contain information about the status of Grade II listed buildings. As such, it is currently not possible to determine whether any of the Grade II listed buildings within the Epsom and Ewell area are at risk.

Summary of future baseline

- 8.26 New development areas within Epsom and Ewell have the potential to impact on the fabric and setting of heritage assets, for example, through inappropriate design and layout. However, it is noted that existing historic environment designations offer a degree of protection to heritage assets and their settings.
- 8.27 New development does not need to pose a threat to the significance of a heritage asset. There may be the opportunity for new development in Epsom and Ewell to enhance the historic setting of its settlements, support historic landscape character and better reveal the significance of heritage assets. This could be achieved through design and layout requirements.
- 8.28 The new Local Plan has the potential to establish cross-cutting provisions relating to development, possibly including the creation and enhancement of functional environmental infrastructure, the encouragement of ecosystem services, the development of buffers to natural spaces and the restoration of connectivity. In this context, improving the resilience of such networks is further likely to protect the historic environment, protecting important views and / or the setting of designated and non-designated assets, in addition to the wider character of key historic settlements within Epsom and Ewell.

Key sustainability issues

- 8.29 The following key issues have been identified through the baseline review for this topic:
- Epsom and Ewell has 321 listed buildings, which includes 17 Grade II* listed buildings and 304 Grade II listed buildings.
 - There are three heritage assets at risk in Epsom and Ewell, which are Epsom Town Centre, Ewell Village and Horton Conservation Areas. It is not possible to determine whether any Grade II listed buildings within Epsom and Ewell are at risk.
 - There are two scheduled monuments in Epsom and Ewell, which are Nonsuch Palace, its formal gardens and associated remains, and Cuddington medieval settlement, and Tower of old church, Ewell.
 - There is one registered park and garden in Epsom and Ewell, which is Grade II listed Nonsuch Park.
 - There are 21 conservation areas in Epsom and Ewell, all of which have maps and conservation area appraisals that provide detail on the historical development of the area, location, activities and setting, spatial analysis, the buildings, character areas, and negative features and issues.
 - The Epsom and Ewell HER includes 802 designated and non-designated heritage assets which provide local historic significance.
 - EEBC have over 70 buildings or structures which are valued for their contribution to the local scene, or for their local historic associations, but are not considered to be of national importance.
 - It will be important to ensure that future development avoids / minimises impacts upon the historic environment and maximises opportunities to improve the fabric and setting of the historic environment.

- There are significant opportunities to enhance awareness and understanding of Epsom and Ewell's historic environment resource and better reveal the historic significance of its assets.

SA objectives and appraisal questions

8.30 Based on the key issues discussed above, it is proposed that the SA should include the objectives and assessment questions in **Table 8.2** below.

Table 8.2 Proposed objectives and assessment questions

SA objective	Appraisal questions
10. Conserve and enhance Epsom and Ewell's historic environment, including designated and non-designated heritage assets	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? • Conserve and enhance the special interest, character and appearance of conservation areas and their setting? • Conserve and enhance the special interest, character and appearance of registered parks and gardens, and their settings? • Protect and where possible, enhance the wider historic environment, including historic landscapes?
11. Conserve and enhance Epsom and Ewell's archaeological resource	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance archaeological resource, including features listed on the Epsom and Ewell HER?
12. Promote opportunities for enhancing the understanding of Epsom and Ewell's distinct historic environment	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Support access to, interpretation and understanding of the historic evolution and character of the environment? • Ensure that, where possible, development contributes to improved public understanding of assets and their settings?

9. Housing

Focus of theme

- Housing quality
- Housing mix
- Housing affordability

Policy context

- 9.1 **Table 9.1** below presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key messages emerging from the review are then summarised after the table.

Table 9.1 Plans, policies and strategies reviewed in relation to the housing SA topic

Document title	Year of publication
National	
National Planning Policy Framework (NPPF)	2021
Fixing our broken housing market	2017
Local	
Epsom and Ewell Core Strategy	2007
Epsom Town Centre Area Action Plan	2011
Epsom and Ewell Development Management Policies Document	2015
Epsom and Ewell Strategic Housing Market Assessment Update	2019
Epsom and Ewell Interim Homelessness Strategy	2018
Epsom and Ewell Gypsy and Traveller Accommodation Assessment (GTAA)	2022

- 9.2 Chapter 5 of the NPPF focuses on the delivery of a sufficient supply of homes, and states that:

“To support the government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”.

- 9.3 In relation to the delivery of affordable housing, the NPPF states that:

- 9.4 *“...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)”.*

- 9.5 The 'Fixing our broken housing market' White Paper sets out how the Government intends to boost housing supply and, over the long term, create a more efficient housing market whose outcomes more closely match the needs and aspirations of all households and which support wider economic prosperity.
- 9.6 At the local level, and in relation to the housing SA topic, Epsom and Ewell's Core Strategy includes the following policies:
- Policy CS 7 – Housing Provision
 - Policy CS 8 – Broad Location of Housing Development
 - Policy CS 9 – Affordable Housing and Meeting Housing Needs
- 9.7 In addition to this, the Epsom Town Centre Area Action Plan identifies the following policies in relation to the housing SA topic:
- Policy E2 – Housing Capacity in the Town Centre
 - Policy E7 – Town Centre Building Height
 - Policy E14 – Depot Road and Upper High Street
 - Policy E15 – The Utilities Site
 - Policy E16 – Epsom Station Site
 - Policy E17 – Other Opportunity Sites
- 9.8 The Development Management Policies Document also identifies several policies relevant to the housing SA topic:
- Policy DM2 – Infilling within the Major Developed Sites
 - DM11 – Housing Density
 - DM12 – Housing Standards
 - DM21 – Meeting Local Housing Needs
 - DM22 – Housing Mix
- 9.9 Epsom and Ewell have commissioned a Housing and Economic Development Needs Assessment (HEDNA) to analyse housing and economic development needs over the plan period which will inform the Local Plan. This document will supersede the Strategic Housing Market Assessment Update (2019).
- 9.10 Epsom and Ewell's Interim Homelessness Strategy has specifically been designed to meet the needs of groups who are at particular risk of becoming homeless, including care leavers, people leaving prison, people who have left the regular Armed Forces, victims of domestic abuse, people leaving hospital and people suffering from mental illness.
- 9.11 The Epsom and Ewell Gypsy and Traveller Accommodation Assessment (GTAA) identifies a need for ten pitches for Gypsies and Travellers for households that met the planning definition, and eight pitches for households that did not meet the planning definition, for the period 2022 to 2040. The planning definition refers to that of a Gypsy or Traveller and is defined in Planning policy for traveller sites (2015).²⁵ There were 11 households identified

²⁵ UK Government (2015): 'Planning policy for traveller sites', [online] available to access via [this link](#)

in Epsom and Ewell that met this planning definition, and 17 households that did not meet the planning definition.

Summary of current baseline

- 9.12 Surrey is the second most expensive county for housing nationally, making home-owning unaffordable for many essential workers. The average house price in Surrey is £537,000, compared to the national average of £298,000.²⁶
- 9.13 The ratio of median house price to median gross annual workplace-based earnings in Epsom and Ewell in 2021 was 18, which is higher than the ratio for both Surrey (14) and the South East (11.1).²⁷ For Epsom and Ewell, this means that in 2021, full-time employees could typically expect to spend around 17.98 times their workplace-based annual earnings on purchasing a home. Notably, this ratio stood at 16.4 in 2019 and 17.2 in 2020, marking a decrease in housing affordability in Epsom and Ewell over this two-year period.
- 9.14 The government's standard method for housing needs calculates the need for 576 dwellings per annum (as of 1st April 2022) in Epsom and Ewell. As mentioned above, the Council has commissioned a HEDNA as a core piece of evidence to inform the Local Plan.
- 9.15 The Council's Authority Monitoring Report (AMR) 2020 to 2021 identifies the level of housing delivery that has occurred since the Core Strategy was adopted, including the delivery of affordable housing. Need for affordable housing in Epsom and Ewell is high, and in the 2020 to 2021 monitoring year, 5 additional affordable homes were completed.
- 9.16 The Epsom and Ewell SHMA Update (that will be superseded by the HEDNA) identified that for market homes the greatest demand was for two- and three-bedroom units.
- 9.17 The SHMA Update also identifies the need for affordable housing and estimated that 349 households per annum could not afford to pay the market entry threshold cost and therefore needed affordable housing, with approximately 40% of the need being for social or affordable rents.
- 9.18 Considering the housing requirements of specific groups, the SHMA Update identifies that there will need to be a 32% increase in rented sheltered and a 35% increase in leased sheltered homes by 2035. There is also a need for an additional 248 units of Extra Care accommodation between 2020 and 2035, 80% of which should be leasehold and 20% rented.
- 9.19 In terms of households with disabled members including wheelchair users, the SHMA Update highlights that the more effective use of the social housing wheelchair assets that come into availability should be a priority, with the objective of meeting the needs of the 30 already on the housing register requiring wheelchair-accessible accommodation.
- 9.20 Regarding the private rented sector (PRS), the number of PRS tenancies let to those claiming Housing Benefit has reduced sharply, by 35%, since 2012. If PRS tenancies are becoming less of an option for those on lower incomes, this is of concern to the authority, especially given the high proportion of households

²⁶ Surrey County Council (2022): 'Local Transport Plan 2022 to 2032', [online] available to access via [this link](#)

²⁷ Office for National Statistics (2022) 'House price to workplace-based earnings ratio', [online] available to access via [this link](#)

with dependent children that rely upon it. The SHMA Update states that the authority may wish to take measures to engage with landlords offering homes at the lower end of the price spectrum, to help them remain in the market.

- 9.21 Notably, Epsom and Ewell has a disparity between its wealthiest and poorest residents. The borough has the highest level of owner-occupied properties in Surrey (76.99%); however, a small number of its wards rank high in the most deprived wards in Surrey. Two areas that are particularly deprived are in the wards of Court and Ruxley, centred on the areas of social housing on the Longmead and Watersedge estates. Often, the level of deprivation is concealed when look at ward data as these areas of deprivation are surrounded by relatively affluent areas.

Summary of future baseline

- 9.22 The suitability (e.g., size and design) and affordability of housing for local requirements depends on the implementation of appropriate housing policies through the new Local Plan. Unplanned development may have wider implications in terms of transport and access to infrastructure, or the natural environment.
- 9.23 The longer-term impacts of the Covid-19 pandemic are currently unclear. However, in the context of Epsom and Ewell, it is likely to impact (positively and negatively) on the vitality and viability of town centres, contribute to changes in demand for housing, employment land and retail, and on community provision in smaller centres.

Key sustainability issues

- 9.24 The following key issues have been identified through the baseline review for this theme:
- Housing affordability, and the availability of appropriate dwellings for residents in Epsom and Ewell, are key concerns.
 - The Council is currently preparing a HEDNA to support the Local Plan which will provide an up-to-date assessment on housing needs. The government's standard method for housing needs calculates the need for 576 dwellings per annum (as of 1st April 2022) in Epsom and Ewell.
 - An estimated 349 households per annum could not afford to pay the market entry threshold cost and therefore needed affordable housing.
 - There will need to be a 32% increase in rented sheltered and a 35% increase in leased sheltered homes by 2035. There is also a need for an additional 248 units of Extra Care accommodation between 2020 and 2035.
 - The more effective use of the social housing wheelchair assets that come into availability should be a priority in Epsom and Ewell.
 - The number of PRS tenancies let to those claiming Housing Benefit has reduced sharply, by 35%, since 2012, which is a key concern.
 - There is a large disparity between the richest and poorest residents in Epsom and Ewell, with pockets of deprivation, especially in the areas of social housing on the Longmead and Watersedge estates.

SA objectives and appraisal questions

9.25 Based on the key issues discussed above, it is proposed that the SA should include the objectives and assessment questions in **Table 9.2** below.

Table 9.2 Proposed objectives and assessment questions

SA objective	Appraisal questions
13. Provide everyone with the opportunity to live in good quality, affordable housing	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Support the timely delivery of an appropriate mix of housing types and tenures? • Ensure delivery of high-quality, affordable and specialist housing that meets the needs of all residents? • Provide quality and flexible homes that meet people's needs? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Provide housing in sustainable locations that allow easy access to a range of local services and facilities?

10. Landscape

Focus of topic

- Designated and non-designated sites and areas
- Landscape, townscape and villagescape character
- Visual amenity

Policy context

10.1 **Table 10.1** below presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key messages emerging from the review are then summarised after the table.

Table 10.1 Plans, policies and strategies reviewed

Document title	Year of publication
International	
The European Landscape Convention	2000
National	
National Planning Policy Framework (NPPF)	2021
A Green Future: Our 25 Year Plan to Improve the Environment	2018
The National Design Guide	2019
National Character Area profiles	Various
National Model Design Code	2021
Local	
Epsom and Ewell Core Strategy	2007
Epsom Town Centre Area Action Plan	2011
Epsom and Ewell Development Management Policies Document	2015
Epsom and Ewell Landscape Character Assessment	2015
Epsom and Ewell Green Belt Study	2017
Epsom and Ewell Green Belt Study Stage Two	2018
Epsom and Ewell Environment Character Study	2008

10.2 The new Local Plan will need to have regard to the NPPF which gives great weight to conserving and enhancing protected landscapes, as well as landscape character and scenic beauty. The scale and extent of development within these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

10.3 The NPPF recognises the role of green infrastructure in landscape settings, as well as the importance of designated biodiversity sites, habitats, woodland, historic features, agricultural land, and cultural landscapes. The positive contribution that land remediation can make in terms of addressing despoiled, degraded, derelict, contaminated and unstable land is also recognised.

- 10.4 The European Landscape Convention of the Council of Europe promotes the protection, management and planning of the landscapes and organises international co-operation on landscape issues. The convention was adopted in October 2000 and is the first international treaty to be exclusively concerned with all dimensions of European landscapes.
- 10.5 The 25-year Environment Plan and National Design Guide complement each other with their aims for a cleaner, greener country which puts the environment first and celebrates the variety of natural landscapes and habitats. Design is focused on beautiful, enduring, and successful places, which respond to local character and provide a network of high quality green open spaces. Specifically, the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Goal 6 'Enhanced beauty, heritage, and engagement with the natural environment' of the Government's "A Green Future: Our 25 Year Plan to Improve the Environment" directly relates to the landscape topic.
- 10.6 National Character Area (NCA) Profiles are published by Natural England and divide England in 159 distinct natural areas based on their landscape, biodiversity, geodiversity, historic, cultural, and economic characteristics. NCAs follow natural features in the landscape and are not aligned with administrative boundaries. NCA profiles describe the features which shape each of these landscapes, providing a broad context to its character. They also provide Statements of Environmental Opportunities to protect and enhance the special qualities of these areas. Additionally, the Government's 25 Year Environment Plan states the intention to work with relevant authorities to deliver environmental enhancements within all 159 NCAs across England.
- 10.7 As set out in the NPPF, it should be ensured that the design of streets, parking areas, other transport elements, and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code. Design Codes can set out a necessary level of detail in sensitive locations (e.g., with heritage considerations) and specific ways to maintain local character.
- 10.8 At the local level, and in relation to the landscape SA topic, Epsom and Ewell's Core Strategy includes the following policies:
- Policy CS2 – Green Belt
 - Policy CS4 – Open Spaces and Green Infrastructure
- 10.9 In addition to this, the Epsom Town Centre Area Action Plan identifies the following policies in relation to the landscape SA topic:
- Policy E1 – Town Centre Boundary
 - Policy E7 – Town Centre Building Height
 - Policy E9 – Public Realm
 - Policy E14 – Depot Road and Upper High Street
 - Policy E15 – The Utilities Site
 - Policy E16 – Epsom Station Site
 - Policy E17 – Other Opportunity Sites

10.10 The Development Management Policies Document also identifies several policies relevant to the landscape SA topic:

- DM1 – Extent of the Green Belt
- DM2 – Infilling within the Major Developed Sites
- DM3 – Replacement and Extensions of Buildings in the Green Belt
- DM5 – Trees and Landscape
- DM6 – Open Space Provision
- DM9 – Townscape Character and Local Distinctiveness
- DM10 – Design Requirements for New Developments
- DM13 – Building Heights

10.11 The Epsom and Ewell Landscape Character Assessment (LCA) identifies the key characteristics of Epsom and Ewell's landscape, which contribute to its sense of place. In addition to this, the LCA is an aid to decision making and the future management of the landscape.

10.12 The Epsom and Ewell Green Belt Study assesses the performance of land designated as Metropolitan Green Belt in Epsom and Ewell as part of the evidence base for the partial review of the Epsom and Ewell Core Strategy.

10.13 Stage Two of the Epsom and Ewell Green Belt Study assesses the promoted or lower performing Green Belt parcels, considers constraints and identifies parcels which are potentially suitable for release from the Green Belt which could potentially contribute to EEBC's housing land supply as part of the current Epsom and Ewell Core Strategy Review.

10.14 Both documents will be used to inform decisions relating to the long-term growth aspirations for the borough and discussions with neighbouring authorities under the Duty to Cooperate relating to the accommodation of wider growth pressures from both within and beyond Surrey.

10.15 The Epsom and Ewell Environment Character Study forms an important piece of research in helping the Council and the public to understand the character of the Borough. The Study comprises an assessment of the existing townscape character, together with policy recommendations targeted at preserving and enhancing character.

Summary of current baseline

Nationally protected landscapes

10.16 Epsom and Ewell is located approximately 1.8 kilometres north of the Surrey Hills Area of Outstanding Natural Beauty (AONB). It stretches across the county, meeting with the Kent Downs AONB to the east and the South Downs National Park to the south and west. It includes three of England's National Character Areas: The North Downs, Wealden Greensand and Low Weald. Notably, a formal boundary review is currently underway by Natural England, which will consider the case for extending the boundary of the Surrey Hills

AONB.²⁹ In this respect, future development within Epsom and Ewell may have a greater impact on the AONB if the boundary is extended towards the district.

10.17 According to the Green Belt Study, 42% of Epsom and Ewell is designated as Green Belt land, forming part of the much wider Metropolitan Green Belt. The Green Belt forms a horseshoe shape wrapping around the central urban areas in the centre and north of the borough. The Green Belt stretches beyond the borough boundary, merging with Green Belt land within the Royal Borough of Kingston upon Thames to the west, Mole Valley District Council to the southwest, Reigate and Banstead Borough Council to the south east and a smaller area of Green Belt land in the London Borough of Sutton to the east. **Figure 10.1** below shows the location of the AONB and Green Belt.

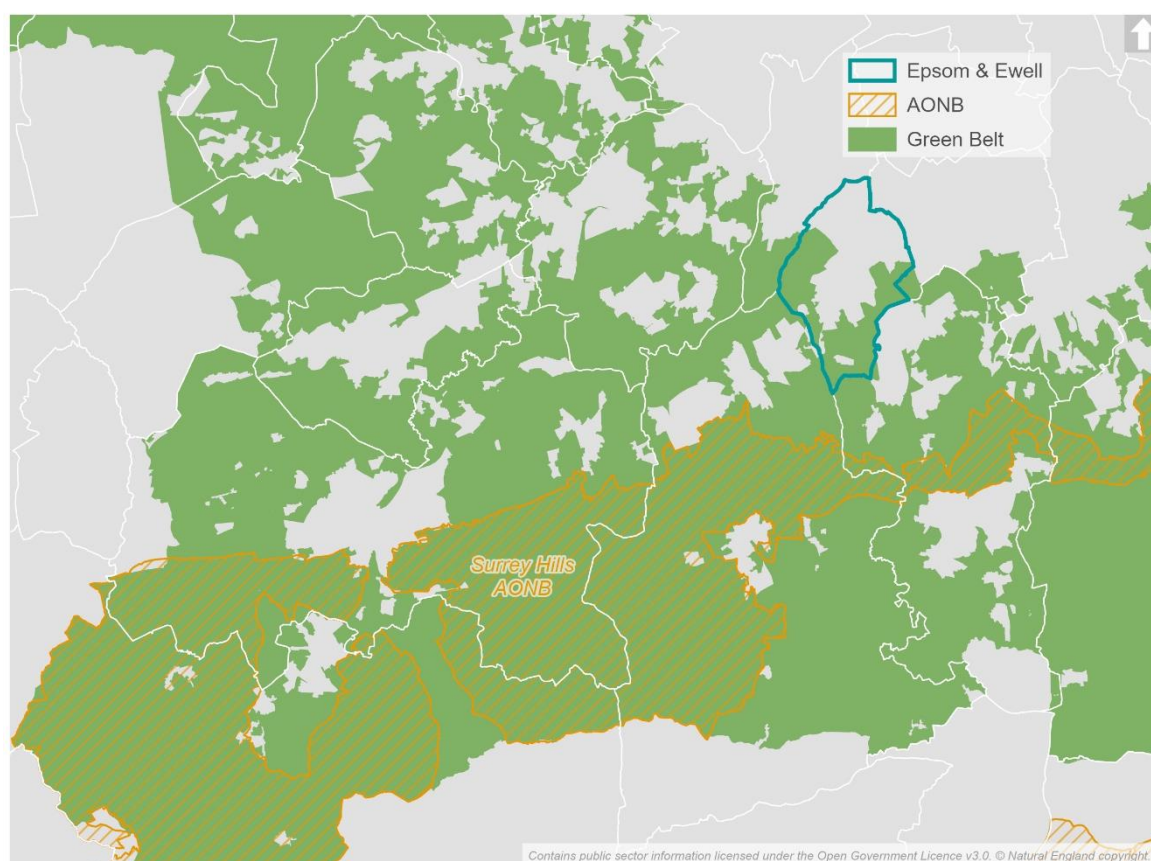


Figure 10.1 AONB and Green Belt in Epsom and Ewell and the wider region

National Character Areas

10.18 National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. The north-western extent of Epsom and Ewell falls within the Thames Basin Lowlands NCA³⁰, and the south-eastern extent falls within the North Downs NCA³¹ (shown in **Figure 10.2** overleaf). The profiles for these two NCAs describe the following statements of environmental opportunities (SEO).

10.19 The SEOs associated with the **Thames Basin Lowland NCA** are as follows:

²⁹ Surrey Hills AONB Boundary Review (no date): 'Welcome to the Conversation', [online] available to access via [this link](#)

³⁰ Natural England (2014): 'NCA Profile: 114 Thames Basin Lowlands (NE571)', [online] available to access via [this link](#)

³¹ Natural England (2013): 'NCA Profile: 119 North Downs (NE431)', [online] available to access via [this link](#)

- **SEO 1:** Maintain and restore the natural functions of the rivers Wey, Mole, Hogsmill and Wandle at a landscape scale, providing improvements in water quality and water availability and helping to regulate water flow while reducing pollution and the risk of flooding to benefit biodiversity, geodiversity and enhance a sense of place.
- **SEO 2:** Conserve and manage the semi-natural vegetation and farmed landscape of the Thames Basin Lowlands to reduce fragmentation between the semi-natural habitats and enhance ecological connectivity, provide benefits for water quality, enhance biodiversity, strengthen the landscape character and increase a sense of well-being.
- **SEO 3:** Promote creative and effective sustainable urban development, including a well-connected network of high-quality green infrastructure in and around Greater London and other urban areas incorporating sustainable transport, while managing and enhancing public green space and recreational opportunities for local communities to enjoy, and to benefit biodiversity and landscape character.

10.20 The SEOs associated with the **North Downs NCA** are as follows:

- **SEO 1:** Manage, conserve and enhance the distinctive rural character and historic environment of the North Downs, including the long-established settlement pattern, ancient routeways and traditional buildings. Protect the tranquillity of the landscape and sensitively manage, promote and celebrate the area's rich cultural and natural heritage, famous landmarks and views for future generations.
- **SEO 2:** Protect, enhance and restore active management to the diverse range of woodlands and trees of the North Downs, for their internationally and nationally important habitats and species, cultural heritage and recreational value and to help to deliver climate change mitigation and adaptation. Seek opportunities to establish local markets for timber and biomass to support the active management of local woods, while recognising their contribution to sense of place, sense of history and tranquillity.
- **SEO 3:** Manage and enhance the productive mixed farming landscape of the North Downs and the mosaic of semi-natural habitats including the internationally important chalk grassland. Promote sustainable agricultural practices to benefit soils, water resources, climate regulation, biodiversity, geodiversity and landscape character while maintaining food provision.
- **SEO 4:** Plan to deliver integrated, well-managed multi-functional green space in existing and developing urban areas, providing social, economic and environmental benefits and reinforcing landscape character and local distinctiveness, particularly on or alongside the boundaries of the designated landscapes within the North Downs.

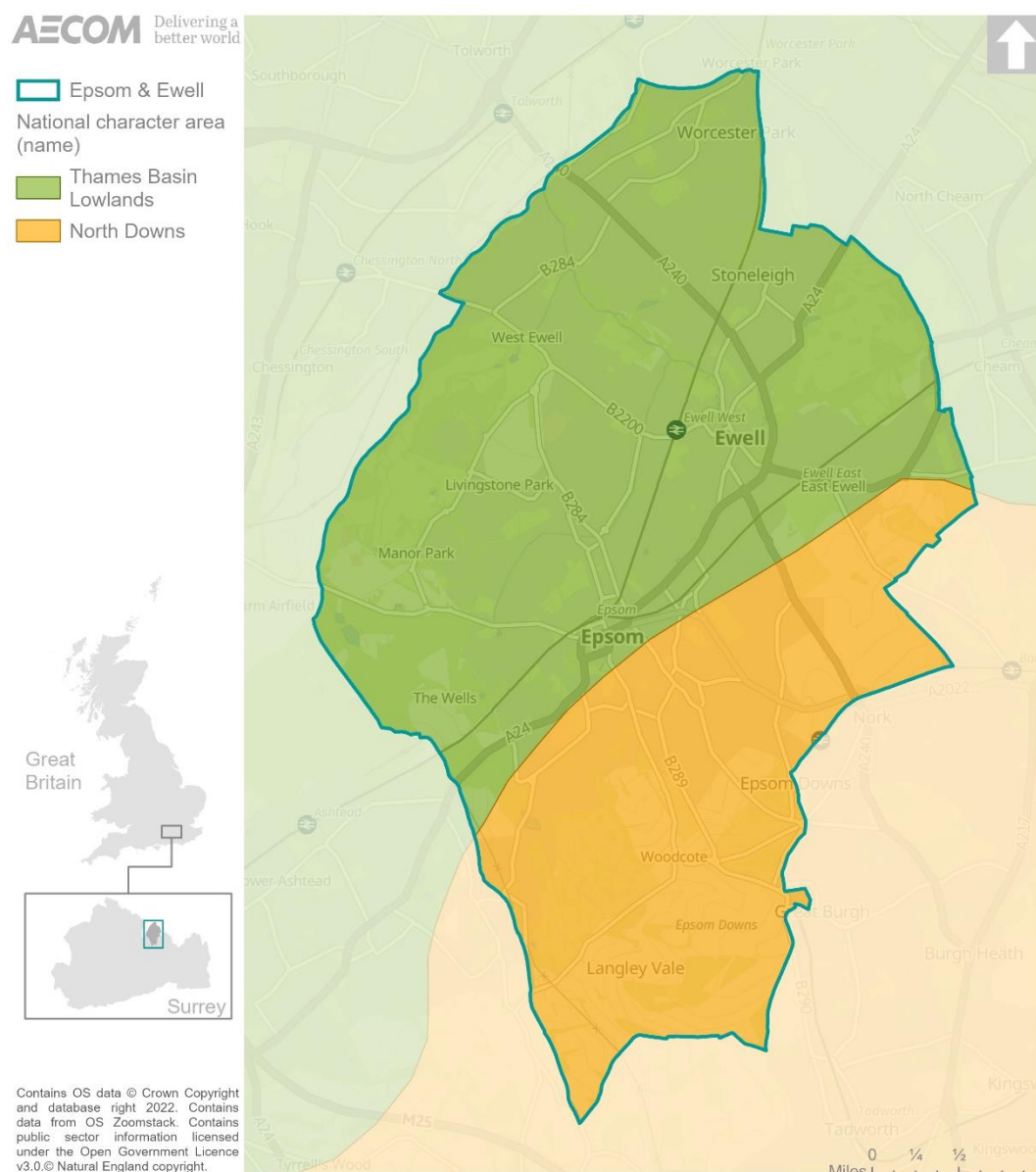


Figure 10.2 NCAs within Epsom and Ewell

Landscape, townscape and villagescape character

10.21 Landscape, townscape, and villagescape character plays an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns which make one area different from another. Landscape, townscape, and villagescape character can assist in the assessment of the likely significance of effects of change resulting from development and the value of landscape, both in visual and amenity terms.

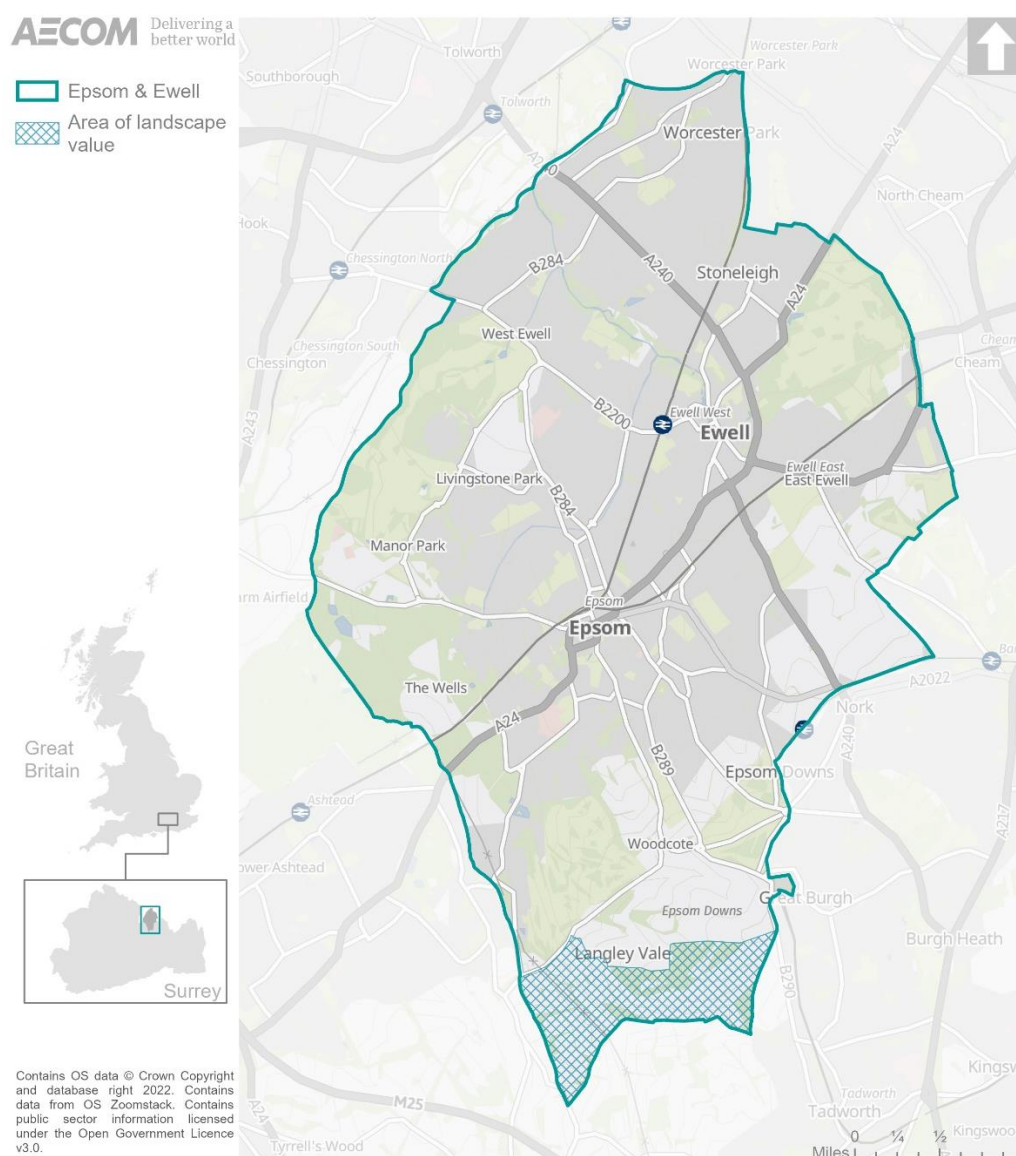
10.22 Completed in 2015, the Epsom and Ewell LCA classifies nine Landscape Character Areas (LCAs) across the borough, which are:

- CD1: Ashted and Woodcote Parks Chalk Down with Woodland
- CF3: Leatherhead to Epsom Downs Open Chalk Farmland
- CF4: North Looe Open Chalk Farmland
- LF4: Horton Rolling Clay Farmland

- LF5: Ashted East Rolling Clay Farmland
- LW3: Ashted and Epsom Commons Clay Woodland
- UE3: Epsom Downs
- UW7: Ewell Hogsmill
- UW8: Nonsuch Park

10.23 The LCA also provides guidance for the management of the LCAs in response to new development. For example, new development areas have the potential to adversely impact upon the distinctive qualities of each LCA in the absence of sensitive design. In this respect, this evidence base can be used to enable informed decisions to be made about the future protection, management and sustainable development of Epsom and Ewell's landscapes, townscapes, and villagescapes, and can be complemented by more detailed local studies.

10.24 An area of landscape value is shown in **Figure 10.3** below. This includes the area south of Langley Vale, covering Walton Downs.



Tree Preservation Orders

10.25 Implemented by local planning authorities, Tree Preservation Orders (TPOs) are designated to protect specific trees, groups of trees or woodlands in the interests of their amenity value. When considering 'amenity'; the local planning authority will likely take into consideration the following criteria³²:

- Visibility: the extent to which the trees or woodlands can be seen by the public; and
- Individual, collective, and wider impact: considering the importance of the trees or woodlands in relation to their cultural or historic value, contribution to and relationship with the landscape and/or their contribution to the character or appearance of a conservation area.

10.26 Epsom and Ewell Borough Council have designated numerous TPOs in the interest of their amenity value.³³ The TPOs, grouped by location, are available to view [here](#).

Visual amenity

10.27 It is useful to note that the views across Epsom and Ewell are also an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process. Changes due to both development and landscape manipulation can see these views degraded over time.

Summary of future baseline

10.28 New development has the potential to lead to incremental but small changes in landscape, townscape and villagescape character and quality in and around Epsom and Ewell. This includes from the loss of landscape features and areas with an important visual amenity value. An increase in population also has the potential to negatively impact landscape character.

Key sustainability issues

10.29 The following key issues have been identified through the baseline review for this topic:

- Epsom and Ewell is located approximately 1.8 kilometres north of the Surrey Hills AONB and 42% of the borough is designated Green Belt land.
- Two NCAs cover Epsom and Ewell, which are the Thames Basin Lowland NCA in the northwest and the North Downs NCA in the southeast.
- The Epsom and Ewell LCA classifies nine LCAs across the borough and provides guidance for the management of these LCAs in response to new development.
- Epsom and Ewell Borough Council have designated numerous TPOs in the interest of their amenity value, covering areas across the entire borough.

³² GOV.UK (2014): 'Tree Preservation Orders – General', [online] available to access [here](#)

³³ Epsom and Ewell Borough Council (no date): 'Tree information and preservation orders', [online] available to access via [this link](#)

- Visual amenity is an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process.
- New development has the potential to lead to incremental change in landscape, townscape and villagescape character, and visual amenity.

SA objectives and appraisal questions

10.30 Based on the key issues discussed above, it is proposed that the SA should include the objectives and assessment questions in **Table 10.2** below.

Table 10.2 Proposed objectives and assessment questions

SA objective	Appraisal questions
14. Protect and enhance the character and quality of Epsom and Ewell's landscapes, townscapes and villagescapes	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Support the distinctive qualities of the NCAs and LCAs within and surrounding Epsom and Ewell? • Protect and enhance key landscape, townscape and villagescape features which contribute to local distinctiveness? • Protect locally important viewpoints contributing to sense of place and visual amenity? • Improve understanding of Epsom and Ewell's distinctive landscape, townscape and villagescape resources?

11. Land and Soils

Focus of topic

- Soil quality
- Agricultural land
- Minerals resources

Policy context

11.1 **Table 11.1** below presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key messages emerging from the review are then summarised after the table.

Table 11.1 Plans, policies and strategies

Document title	Year of publication
National	
National Planning Policy Framework (NPPF)	2021
A Green Future: Our 25 Year Plan to Improve the Environment	2018
National Planning Policy for Waste	2014
Waste Management Plan for England	2013
Safeguarding our Soils: A Strategy for England	2009
Local	
Surrey Local Aggregate Assessment	2020
Surrey Minerals Plan Core Strategy Development Plan Document	2011
Surrey Waste Local Plan	2020
Epsom and Ewell Core Strategy	2007
Epsom Town Centre Area Action Plan	2011
Epsom and Ewell Development Management Policies Document	2015

11.2 Land and soil feature in Chapter 11, Chapter 15, and Chapter 17 of the NPPF. The NPPF states the following:

- Chapter 11: planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions. Therefore, support is given to the use of brownfield land within settlements in addition to remediating despoiled, degraded, derelict, contaminated or unstable land. Support is also given to promoting the development of under-utilised land and buildings.
- Chapter 11: planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed use schemes and engaging in opportunities to achieve net environmental gains.
- Chapter 15: planning policies and decisions should work with the natural and local environment by:

- Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and
 - Recognising the unique and intrinsic value of the countryside and the wider benefits from natural capital and ecosystem services – including other benefits of the best and most versatile agricultural land, and of trees and woodland.
 - Chapter 17: planning policies should safeguard mineral resources by defining Mineral Safeguarding Areas so that the known locations of specific minerals resources are not sterilised by non-mineral development.
- 11.3 The 25-year Environment Plan discusses measures to improve soil quality, restore and protect peatlands, use water more sustainably, reduce pollution, maximise resource efficiency and minimise environmental impacts.
- 11.4 The National Planning Policy for Waste outlines the UK Government's goal of a more sustainable and efficient approach to resource use and management. It states that local planning authorities should ensure sufficient opportunities are taken to meet the identified needs for the management of waste streams. It also states that local planning authorities should ensure the need for waste management facilities is considered alongside other spatial planning concerns and should recognise the contribution waste management can bring to the development of sustainable communities.
- 11.5 The Waste Management Plan for England identifies measures being taken to move towards a zero-waste economy, including a national waste plan which seeks to identify measures to move towards a circular economy in which resources are kept in use for longer. To do this, there needs to be a maximisation in the value of resources used and a minimisation in the waste created.
- 11.6 Safeguarding our Soils: A Strategy for England policy paper seeks to ensure that all soils in England will be managed sustainably, and degradation threats minimised successfully by 2030. This policy paper also seeks to secure sustainable and resilient water resources in addition to the improvement in waterbody quality.
- 11.7 A Local Aggregate Assessment (LAA) is an annual assessment of the demand for and supply of aggregates in a mineral planning authority's (MPA) area. The Surrey LAA is prepared by the MPA in accordance with national policy and guidance and supplementary guidance adopted by the South East Aggregates Working Party (SEAWP) and draws on data from various sources.
- 11.8 The Surrey Minerals Plan Core Strategy Development Plan Document provides strategic policies and site specific proposals for the period to 2026. The Strategy includes policies dealing with development management and consequently, where relevant, guidance is provided on the information required to support planning applications.
- 11.9 The Surrey Waste Local Plan shows how and where waste will be managed in Surrey in the future. The Plan sets out the planning framework for the development of waste management facilities and is used in determining planning applications for waste management facilities.

11.10 At the local level, and in relation to the land and soils SA topic, Epsom and Ewell's Core Strategy includes the following policies:

- Policy CS 8 – Broad Location of Housing Development

11.11 In addition to this, the Epsom Town Centre Area Action Plan identifies the following policies in relation to the land and soils SA topic:

- Policy E14 – Depot Road and Upper High Street
- Policy E15 – The Utilities Site
- Policy E16 – Epsom Station Site
- Policy E17 – Other Opportunity Sites

11.12 The Development Management Policies Document also identifies several policies relevant to the land and soils SA topic:

- DM1 – Extent of the Green Belt
- DM5 – Trees and Landscape
- DM16 – Backland Development
- DM17 – Contaminated Land

Summary of current baseline

Soil resources

11.13 The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality BMV agricultural land.

11.14 The provisional ALC dataset provided by Natural England³⁴ shows that majority of Epsom and Ewell is classed as non-agricultural land. However, there are some areas underlain by Grade 3 (Good to Moderate) agricultural land. Nevertheless, in the absence of a detailed ALC assessment for the whole of Epsom and Ewell, it currently cannot be determined whether this Grade 3 land is Grade 3a (i.e., BMV land) or Grade 3b (i.e., not BMV land).

11.15 The 'Predictive Best and Most Versatile (BMV) Land Assessment' for London and the South East provided by Natural England³⁵ also classes most of Epsom and Ewell as non-agricultural land. However, there are some areas classed as having a moderate likelihood of BMV land (20 to 60% area BMV).

Mineral resources

11.16 Mineral resources are defined as natural concentrations of minerals or bodies of rock that have the potential to be of economic interest in the present or the future due to their inherent properties. As minerals are a non-renewable resource, minerals safeguarding is deployed as the process through which it is

³⁴ Natural England (2010): 'Agricultural Land Classification map London and the South East (ALC007)', [online] available to access via [this link](#)

³⁵ Natural England (2017): 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map London and the South East (ALC019)', [online] available to access via [this link](#)

ensured that non-minerals development does not needlessly prevent the future extraction of mineral resources.³⁶

11.17 According to the latest LAA, aggregate deposits in Surrey comprise sharp sand and gravel (concreting aggregates) and soft sand. The sharp sand and gravel are mainly found as flood plain and terrace deposits in the valleys of the main rivers. Soft sand is found in the Folkestone Formation, which is exposed in a belt stretching across central Surrey from Limpsfield in the east to Farnham in the west.

11.18 According to the Surrey Minerals Plan Core Strategy Development Plan Document, there are no Mineral Safeguarding Areas within Epsom and Ewell.

Waste

11.19 According to the Surrey Waste Local Plan, projected population growth for Surrey over the next two decades suggests an increase from 1.18 million people to 1.37 million by 2037. There are approximately 483,000 houses distributed across Surrey with development of a further 86,000 homes planned between 2015 and 2033.³⁷ Surrey County Council has a duty to plan for the key aspects of the infrastructure that will be required to support those new homes, which includes additional waste management capacity.

11.20 In 2017, 50% of Local Authority collected waste was recycled, and the Surrey Waste Local Plan hopes that this will be increased to 75% by 2035.

Summary of future baseline

11.21 The majority of Epsom and Ewell is non-agricultural land. However, there are some areas classed as having a moderate likelihood of BMV land. Due to this, and the presence of mineral resources within sections of the undeveloped areas of Epsom and Ewell, new developments which are located outside of the settlement boundaries have the potential to lead to losses of higher quality agricultural land and could result in the sterilization of mineral resources.

Key sustainability issues

11.22 The following key issues have been identified through the baseline review for this theme:

- Undeveloped areas of land in Epsom and Ewell have the potential to be underlain by BMV land, though a full classification of the quality of this land has not been undertaken.

SA objectives and appraisal questions

11.23 Based on the key issues discussed above, it is proposed that the SA should include the objectives and assessment questions in **Table 11.2** overleaf.

³⁶ UK Government's guidance on minerals can be accessed [here](#).

³⁷ Department for Communities and Local Government (DCLG): 'Number of Dwellings by Tenure and District'

Table 11.2 Proposed objectives and assessment questions

SA objective	Appraisal questions
15. Ensure the efficient and effective use of land	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Avoid the loss of BMV agricultural land? • Support a brownfield first approach to new development opportunities? • Support the remediation of contaminated land? • Protect the integrity of mineral resources? • Encourage recycling of materials and minimise consumption of resources during construction, operation, and maintenance of new infrastructure? • Minimise waste disposal and manage waste responsibly?

12. Transport

Focus of theme

- Transportation infrastructure
- Traffic flows and congestion
- Accessibility and connectivity
- Public rights of way

Policy context

12.1 **Table 12.1** below presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key messages emerging from the review are then summarised after the table.

Table 12.1 Plans, policies and strategies reviewed

Document title	Year of publication
International	
<u>Directive 2002/49/EC of the European Parliament and of the Council relating to the assessment and management of environmental noise</u>	2002
National	
<u>National Planning Policy Framework (NPPF)</u>	2021
<u>Planning Practice Guidance</u>	2019
<u>National Infrastructure Strategy</u>	2020
<u>Future of Mobility: Urban Strategy</u>	2019
<u>Transport Investment Strategy</u>	2017
<u>Noise Policy Statement for England (NPSE)</u>	2010
<u>The Environmental Noise (England) Regulations 2006</u>	2006
Local	
<u>Transport Strategy for the South East</u>	2020
<u>Draft Surrey County Council Local Transport Plan 2022 to 2032</u>	2022
<u>Epsom and Ewell Core Strategy</u>	2007
<u>Epsom Town Centre Area Action Plan</u>	2011
<u>Epsom and Ewell Development Management Policies Document</u>	2015

12.2 Chapter 9 of the NPPF is dedicated to promoting sustainable transport. The NPPF states the following:

- Transport issues should be considered from the earliest stages of plan-making and development proposals. This is to allow for potential impacts on transport networks to be addressed, for opportunities from existing or proposed transport infrastructure to be realised, for opportunities to promote sustainable travel to be identified and pursued, for the identification and assessment of environmental impacts and the consideration of movement, street and parking patterns.

- Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be considered in both plan-making and decision-making.
- 12.3 National Planning Practice Guidance identifies the importance of local planning authorities undertaking an assessment of the transport implications in developing or reviewing their local plan. This ensures a robust transport evidence base is developed to appropriately support the preparation and/or review of that local plan.
- 12.4 The National Infrastructure Strategy states that transport networks are vital for jobs, businesses, and economic growth and that the Government will continue with its decarbonisation process within the transport sector to meet its net zero emissions target by 2050.
- 12.5 The Department for Transport published the 'Future of Mobility: Urban Strategy' in 2019, which sets out the national approach to maximising transport innovation in cities and towns. It focuses on a model shift towards sustainable modes of transport (walking, cycling and public transport) which are accessible to all, to tackle pollution and reduce greenhouse gas emissions.
- 12.6 The Transport Investment Strategy sets out investment priorities to improve the connectivity, effectiveness and reliability of transport network whilst simultaneously reducing impacts on the natural environment. Furthermore, the document places great emphasis on making cycling and walking the natural choice for shorter journeys, or as part of a longer journeys.
- 12.7 The Noise Policy Statement for England states that the implementation of transport planning systems aids in reducing environmental noise, which left unmanaged can cause an increased risk of health effects.
- 12.8 The Environmental Noise (England) Regulations 2006 apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas (agglomerations). They also require the production of noise action plans based on the maps for road and rail noise and noise in agglomerations. These plans identify areas that are exposed to the highest levels of noise and provide suggestions as to how to reduce these.
- 12.9 The Transport Strategy for the South East, prepared by Transport for the South East, utilises modelling to understand how and when the transport network will see future strain. The Strategy sets out how congestion could be alleviated by investing in public transport alternatives and developing integrated land use planning policies to reduce the need to travel, adopting emerging transport technologies, and implementing more significant demand management policies.
- 12.10 Surrey County Council's draft Local Transport Plan sets out the Council's ambitious roadmap for rethinking and transforming Surrey's transport to 2032 and beyond. The Plan aims to significantly reduce carbon emission from transport to meet the net zero challenge and to support delivery of Surrey's other

priority objectives of enhancing Surrey's economy and communities, as well as the health and quality of life of our residents.

12.11 At the local level, and in relation to the transport SA topic, Epsom and Ewell's Core Strategy includes the following policies:

- Policy CS 16 – Managing Transport and Travel

12.12 In addition to this, the Epsom Town Centre Area Action Plan identifies the following policies in relation to the transport SA topic:

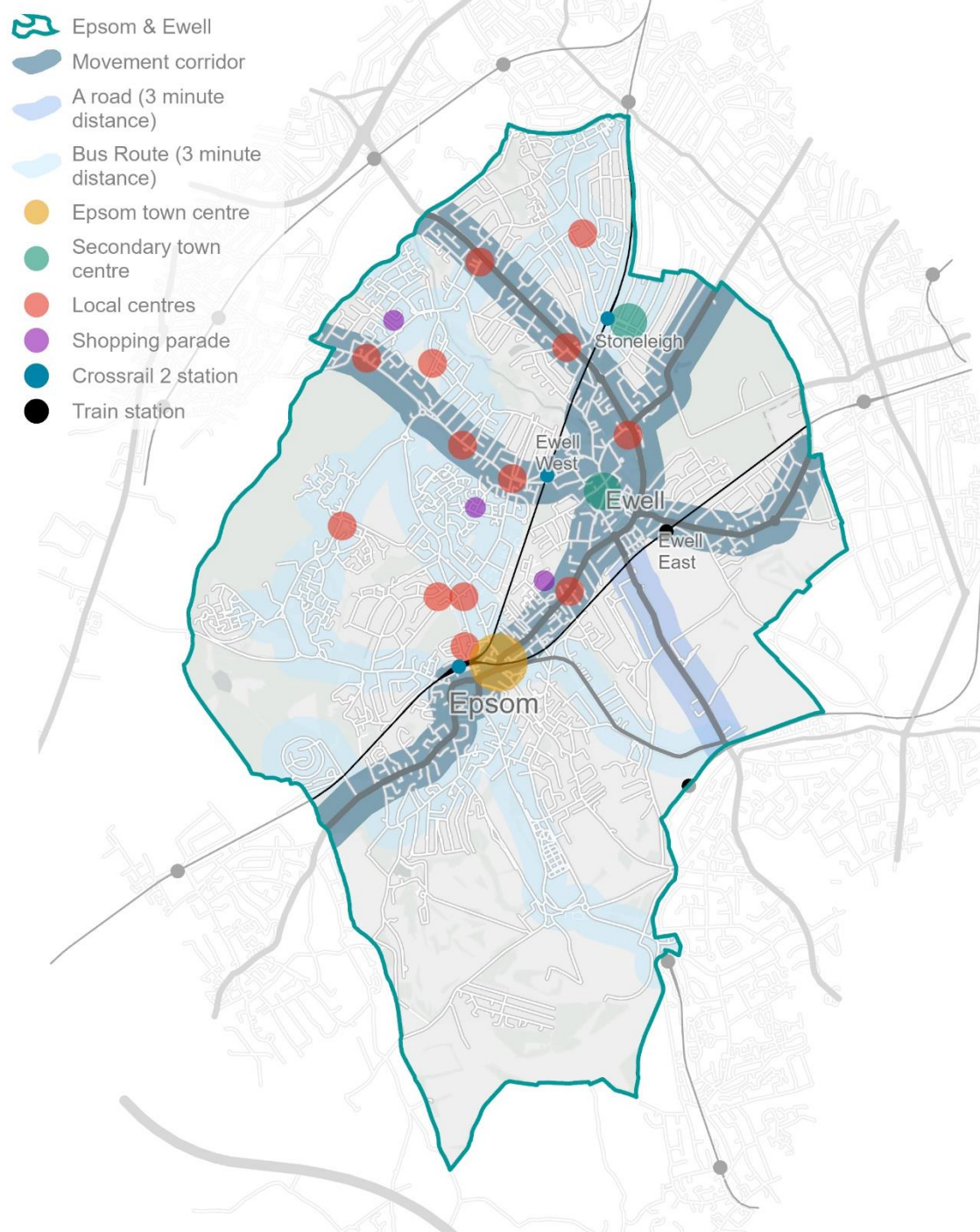
- Policy E10 – Improving Accessibility and Facilities for Cyclists
- Policy E11 – Deliveries to Premises
- Policy E12 – Town Centre Parking
- Policy E13 – Changes to the Road Network

12.13 The Development Management Policies Document also identifies several policies relevant to the transport SA topic:

- DM7 – Footpath, Cycle and Bridleway Network
- DM35 – Transport and New Development
- DM36 – Sustainable Transport for New Development
- DM37 – Parking Standards
- DM38 – Rear Servicing

Summary of current baseline

12.14 Epsom and Ewell has an extensive transport network, and is well served by rail, bus and active transport infrastructure, including footpaths, bridleways and cycle paths. **Figure 12.1** overleaf shows the key movement corridors in the borough, as well as the locations of train stations, bus routes and A roads.



Contains OS data © Crown Copyright and database right 2022. Contains data from OS Zoomstack. Contains public sector information licensed under the Open Government Licence v3.0.

Figure 12.1 Key movement corridors and transport hubs in Epsom and Ewell

Rail network

- 12.15 There are numerous railway stations in Epsom and Ewell, including Epsom, serviced by Southern Railway and South Western Railway, Epsom Downs, serviced by Southern Railway, and Ewell West, serviced by South Western Railway. London Bridge, London Victoria and London Waterloo are all accessible from Epsom in approximately 40 minutes. London Waterloo is also accessible from Ewell West in approximately 30 minutes.
- 12.16 According to the draft Local Transport Plan, rail services experienced overloading prior to Covid-19. Approximately 19% of Surrey's working population commuted into London, leading to significant crowding on peak services. It is not yet clear whether these levels of demand will return.
- 12.17 Crossrail 2 is a proposed rail route that will serve stations through the South East, linking south west and north east London, as well as destinations across Surrey and Hertfordshire. With proposed stops at Epsom and Ewell West stations, Crossrail 2 will support growth in Epsom and Ewell in the future.

Bus network

- 12.18 According to Surrey County Council's website³⁸, there are 13 frequent bus routes and three less frequent bus routes in Epsom and Ewell – details of which can be found in **Table 12.2** below (less frequent bus routes marked with *).

Table 12.2 Bus services operating in Epsom and Ewell

Route Number	Provider	Destination
166	TfL	Epsom Hospital to West Croydon Bus Station
293	TfL	London Road / Morden Station to Epsom Hospital
406	TfL	Cromwell Road Bus Station to Epsom Hospital
408	Falcon Buses	Epsom to Leatherhead to Cobham or Effingham
418	TfL	Cromwell Road Bus Station to Epsom Station
460 / 480	Metro Bus	Epsom Clock Tower to Crawley Bus Station / Preston
467	TfL	Hinchley Wood School to Epsom Hospital
470	TfL	Colliers Wood Station to Epsom High Street
479	Falcon Buses	Epsom to Bookham to Guildford
E5	Falcon Buses	Langley Vale to Epsom to Watersedge
E9	Metro Bus	Epsom Station to Manor Park
E10	Metro Bus	Manor Park to Epsom Station
E16	Falcon Buses	Epsom to Worcester Park
21*	Metro Bus	Leatherhead Station to Crawley Bus Station
623*	Buses 4 U	Ashted to Epsom
318*	Metro Bus	Banstead to Epsom

³⁸ Surrey County Council (no date): 'Maps of bus routes and stops', [online] available to access via [this link](#)

Road network and congestion

- 12.19 Epsom and Ewell is situated just within the M25 corridor, which forms a ring road around greater London. A roads that run through Epsom and Ewell include the A24, A240, A232 and A2022.
- 12.20 According to the draft Local Transport Plan, east to west links in the county (other than the M25) are relatively weak. Before Covid-19, high traffic levels on Surrey's main roads led to unreliable journey times and congestion, and these levels look set to return after Covid-19. Notably, Surrey's roads carry over 60% more than the national average amount of traffic.
- 12.21 There are 687,000 cars available to Surrey households, with approximately 46% of households having two or more cars and only 13% of households having no car available. Epsom and Ewell has the lowest number of cars per household at 1.4 and the lowest proportion of households with two or more cars at 41%. However, it is worth noting that car availability varies much more widely between areas within the districts.

Public Rights of Way network

- 12.22 Surrey has nearly 3,500 kilometres of Public Rights of Way (PRoWs), mostly concentrated in rural areas. Although not a rural area, Epsom and Ewell still has an extensive PRoW network, including footpaths and / or bridleways through key green spaces such as Horton Country Park in the north, Epsom Downs in the south, and Ashted Common along the western boundary of the borough. A map of the PRoW network can be viewed [here](#).

Summary of future baseline

- 12.23 The cumulative impacts of new development have the potential to increase traffic and cause congestion within Epsom and Ewell, especially on key routes. This is likely to continue to be more pronounced during peak times.
- 12.24 However, development within Epsom and Ewell has the potential to lead to enhancements to the transport network to promote more sustainable modes of travel, such as the existing PRoW network.
- 12.25 Additionally, there are opportunities to improve public transport networks within Epsom and Ewell to facilitate the use of more sustainable modes of transport whilst alleviating pressures on main road networks. Similarly, the provision of infrastructure to promote at home (i.e., remote) working is likely to positively contribute towards these aims.
- 12.26 Whilst the negative effects of new development on the transport network are likely to be mitigated in part by new infrastructure, there will be a continuing need for development to be situated in accessible locations.
- 12.27 The ongoing effects of the Covid-19 pandemic have the potential to continue to affect travel patterns, including linked to increased levels of working from home and lower traffic flows at peak times.

Key sustainability issues

12.28 The following key issues have been identified through the baseline review for this theme:

- Epsom and Ewell has an extensive rail network, with train stations in Epsom, Epsom Downs and Ewell (East and West) and a well-connected bus network serving the wider borough, including the local centres.
- The borough has a comprehensive road network, including the A24, A240, A232 and A2022, and is located just within the M25 corridor.
- Epsom and Ewell has an extensive PRow network, which allows for access to key green spaces within and near the borough, such as Horton Country Park, Epsom Downs and Ashted Common.
- The recovery from the COVID-19 pandemic has the potential to change travel patterns in the short, medium and (potentially) longer term.

SA objectives and appraisal questions

12.29 Based on the key issues discussed above, it is proposed that the SA should include the objectives and assessment questions in **Table 12.3** below.

Table 12.3 Proposed objectives and assessment questions

SA objective	Appraisal questions
16. Promote sustainable transport use, encourage accessibility, and reduce the need to travel	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Support the key objectives within the local transport plan and encourage more sustainable transport options? • Improve access to and quality of sustainable transport modes for all communities to encourage modal shift? • Promote improved local connectivity and pedestrian and cyclist movement? • Reduce the number of journeys made and the need to travel? • Improve accessibility to services, facilities, and amenities? • Reduce the impact on residents and the built environment from the road network?

13. Water

Focus of topic

- Water resources and quality
- Wastewater treatment

Policy context

13.1 **Table 13.1** below presents the most relevant documents identified in the policy review for the purposes of the new Local Plan. The key messages emerging from the review are then summarised after the table.

Table 13.1 Plans, policies and strategies

Document title	Year of publication
International	
<u>The Water Environment Regulations</u>	2017
National	
<u>National Planning Policy Framework (NPPF)</u>	2021
<u>A Green Future: Our 25 Year Plan to Improve the Environment</u>	2018
<u>The Water Environment (Water Framework Directive) (England and Wales)</u>	
<u>Future Water: The Government's water strategy for England</u>	2011
<u>Water for Life</u>	2011
Local	
<u>Epsom and Ewell Core Strategy</u>	2007
<u>Epsom Town Centre Area Action Plan</u>	2011
<u>Epsom and Ewell Development Management Policies Document</u>	2015
<u>Thames River Basin District River Basin Management Plan</u>	2015
<u>Thames Water Water Resources Management Plan 2020 to 2100</u>	2020

13.2 The Water Environment Regulations (2017) applies to surface waters (including some coastal waters) and groundwater. It sets out the requirement to prevent the deterioration of aquatic ecosystems; protect, enhance, and restore water bodies to 'good' status; and achieve compliance with standards and objectives for protected areas.

13.3 Water features in Chapter 15 of the NPPF, which states the following:

- Chapter 15: prevent new and existing development from contributing to, being at risk from, or being adversely affected by unacceptable levels of water pollution.

13.4 The 25-year Environment Plan discusses measures to improve soil quality, restore and protect peatlands, use water more sustainably, reduce pollution, maximise resource efficiency and minimise environmental impacts.

13.5 The Water Framework Directive (WFD) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments, and it is Defra's intention to establish a 'framework for integrated catchment management' across England. The Environment Agency is currently consulting on revised river basin management plans for the eight river basin districts in England. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems.
- Promote the sustainable use of water.
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances; and
- Ensure the progressive reduction of groundwater pollution.

13.6 Future Water: The Government's water strategy for England sets out how the water sector will look by 2030, including the improvement in rivers, canals, lakes and seas for both people and wildlife. The vision also includes valuing and protecting water resources and delivering water to customers in a fair, affordable, and cost-reflective manner. This is achieved by breaking the water sector down into multiple sections: future water, water demand, water supply, water quality in the natural environment, surface water drainage, river and coastal flooding, greenhouse gas emissions and charging for water.

13.7 Water for Life highlights the Government's vision for a more resilient water sector. It details the measures that will be deployed to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

13.8 At the local level, and in relation to the water SA topic, Epsom and Ewell's Core Strategy includes the following policies:

- Policy CS 6 – Sustainability in New Developments

13.9 In addition to this, the Epsom Town Centre Area Action Plan identifies the following policies in relation to the water SA topic:

- Policy E14 – Depot Road and Upper High Street
- Policy E15 – The Utilities Site
- Policy E17 – Other Opportunity Sites

13.10 The Development Management Policies Document also identifies several policies relevant to the water SA topic:

- DM4 – Biodiversity and New Development
- DM10 – Design Requirements for New Developments
- DM19 – Development and Flood Risk

13.11 The Thames River Basin District River Basin Management Plan provides a framework for protecting and enhancing the benefits provided by the water environment. The Plan informs decisions on land-use planning and contains four sets of information:

- Baseline classification of water bodies
- Statutory objectives for protected areas
- Statutory objectives for water bodies
- Summary programme of measures to achieve statutory objectives

13.12 Thames Water's Water Resources Management Plan sets out the actions Thames Water will take to provide a secure and sustainable supply of water for their customers in London and the Thames Valley over the next 80 years.

Summary of current baseline

Water resources and quality

13.13 Epsom and Ewell falls within the London Water Resource Zone (WRZ) in Thames Water's Water Resources Management Plan. In the London WRZ, demand exceeds supply from the beginning of the new planning period 2020 to 2025 under dry year annual average (DYAA) conditions, with the deficit increasing to 362 million litres a day by 2044/45 and 623 million litres a day by 2099/2100. The increasing deficit over the forecast period is created by a significant increase in population, exacerbated by the impacts of climate change and increases in exports to neighbouring water companies from Thames Water's current water trading agreements.

13.14 Epsom and Ewell is located within the Thames River Basin District.³⁹ Within this district, the waterbodies which pass through Epsom and Ewell are within the Hogsmill Operational Catchment.⁴⁰ This catchment contains two waterbodies: Epsom Stew Pond and Hogsmill. According to the results of the 2019 water quality assessments for these waterbodies, both have a 'moderate ecological status'.

13.15 The Thames River Basin District River Basin Management Plan outlines the priority river basin management issues that need tackling in the Hogsmill Operational Catchment, which are:

- Poor water quality due to diffuse pollution from road run-off, point source pollution from misconnected pipes, and phosphate from the Hogsmill sewage treatment works (STW).
- Physical modifications such as reinforced bed and walls, the installation of weirs, channel straightening and disconnection from the flood plain; and
- Poor hydro-morphological and habitat diversity.

13.16 However, the following work has been underway to address these issues:

- A habitat enhancement project in the upper reaches of the Hogsmill in Ewell has been funded by the Catchment Partnership Action Fund. This project will enhance the habitat for fish, invertebrates and other wildlife.

³⁹ Environment Agency (2022): 'Thames River Basin District', [online] available to access via [this link](#)

⁴⁰ Environment Agency (2022): 'Hogsmill Operational Catchment', [online] available to access via [this link](#)

- Volunteers will help to monitor the condition of the river through the Riverfly Monitoring Initiative and a pollution monitoring programme. Volunteers will also help deliver river and catchment-based enhancements.
- Fish passage will be enabled past the weirs and concrete channel at the Hogsmill sewage treatment works through a project funded by Thames Water.

Wastewater treatment

13.17 The River Basin Management Plan highlights that pollution from wastewater affects 45% of water bodies in the Thames River Basin District. The following measures can address this issue:

- Mitigate / remediate point source impacts on receptor.
- Reduce point source pollution at source.
- Reduce diffuse pollution at source; and
- Reduce point source pathways (i.e., control entry to water environment)

13.18 Thames Water is currently creating its first Drainage and Wastewater Management Plan (DWMP), which will set out the future challenges for Thames Water's drainage and wastewater systems and the actions needed to manage them over a 25-year period.⁴¹ Public consultation on the draft plan will run from June to September 2022 and the final DWMP will be published in March 2023.

13.19 During the subsequent stages of the SA process, the Environment Agency's Catchment Data Explorer and draft river basin management plan interactive mapping tool shall be explored in further detail to determine any potential impacts to watercourses in relation to the policies and proposals in the new Local Plan.

Nitrate vulnerable zones

13.20 The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater have nitrate concentrations of more than 50 mg/l nitrate or are thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs) within which, Member States are required to establish Action Programmes to reduce and prevent further nitrate contamination. Epsom and Ewell overlaps with the Hogsmill NVZ for surface water, as well as a Drinking Water Safeguard Zone for Groundwater and Surface Water.

Source protection zones

13.21 Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. Epsom and Ewell overlaps with multiple Source Protection Zones (Zones 1, II and III).

⁴¹ Thames Water (2022): 'Drainage and wastewater management plan', [online] available to access via [this link](#)

Summary of future baseline

13.22 Future development has the potential to affect water quality through diffuse pollution, wastewater discharges, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Environment Regulations are likely to lead to continued improvements to water quality within Epsom and Ewell and wider area.

13.23 As water resource planning does not follow Local Authority boundaries, it will be important that Epsom and Ewell liaises with neighbouring local authorities, as well as the Environment Agency, catchment partnerships and water and sewerage companies to help identify water supply and quality issues, as well as the need for new water and wastewater infrastructure to support future growth.

Key sustainability issues

13.24 The following key issues have been identified through the baseline review for this theme:

- Epsom and Ewell is located within the Thames River Basin District: or more specifically, the Hogsmill Operational Catchment: which contains two waterbodies: Epsom Stew Pond and Hogsmill. Both of these waterbodies have a 'moderate ecological status'.
- Epsom and Ewell overlaps with the Hogsmill NVZ for surface water, as well as a Drinking Water Safeguard Zone for Groundwater and Surface Water.
- Epsom and Ewell also overlaps with multiple Source Protection Zones (Zones 1, II and III).
- Plan making should consider how local decisions affect water supply, such as water accessibility issues, and ensure that appropriate drainage infrastructure is in place to accommodate new development areas.

SA objectives and appraisal questions

13.25 Based on the key issues discussed above, it is proposed that the SA should include the objectives and assessment questions in **Table 13.3** below.

Table 13.3 Proposed objectives and assessment questions

SA objective	Appraisal questions
17. Manage Epsom and Ewell's water resources in a sustainable manner	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Support improvements to water quality consistent with the aims of the Water Environment regulations? • Ensure that appropriate drainage infrastructure is available to serve new development areas?

SA objective

Appraisal questions

-
- Reduce pressures on wastewater treatment works and the capacity of the existing networks?
 - Help to minimise diffuse surface water pollution?
 - Protect surface water and groundwater resources?
 - Minimise water consumption?
-

14. Proposed SA framework and methodologies

14.1 The SA framework has been established through the identification of key issues and environmental objectives as part of the scoping exercise. This draws upon the baseline position and policy context that has been prepared for a range of SA topics (as set out in **Chapters 2 to 13**).

14.2 The framework consists of a set of headline objectives and supporting appraisal questions, which will be used to appraise the environmental effects of the draft Local Plan (and reasonable alternatives).

14.3 **Table 14.1** below outlines the proposed SA framework, bringing together the objectives and appraisal questions that have been set out at the end of each SA topic.

Table 14.1 Proposed SA framework

SA topic	SA objective	Appraisal questions
Air quality	1. Deliver improvements in air quality in Epsom and Ewell?	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Reduce emissions of pollutants from transport? • Promote the use of low emission vehicles? • Promote enhancements in sustainable modes of transport, including walking, cycling and public transport? • Promote enhancements to green infrastructure networks to facilitate increased absorption and dissipation of pollutants?
	2. Support the integrity of internationally, nationally, and locally designated sites	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Protect the integrity of the internationally and nationally designated sites within and near Epsom and Ewell? • Manage pressures on locally designated sites for biodiversity and geodiversity in Epsom and Ewell?
Biodiversity	3. Protect and enhance habitats and species in Epsom and Ewell	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Protect and enhance priority habitats, and the habitat of priority species? • Protect key species during the construction and operational phases of new development areas? • Protect and enhance ecological networks? • Achieve a net gain in biodiversity?

SA topic	SA objective	Appraisal questions
	4. Enhance understanding of biodiversity	<ul style="list-style-type: none"> • Increase the resilience of Epsom and Ewell's biodiversity to the potential effects of climate change? <p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Support access to, interpretation and understanding of biodiversity? • Encourage opportunities for engagement with Epsom and Ewell's biodiversity resource?
Climate Change Adaptation	5. Support Epsom and Ewell's resilience to the potential effects of climate change, particularly flooding	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Ensure that development does not take place in areas at medium to high risk of flooding, considering the likely future effects of climate change? • Improve and extend green infrastructure networks to support adaptation to the potential effects of climate change? • Sustainably manage water run-off through the use of SuDS, reducing surface water runoff? • Ensure the potential risks associated with climate change are considered through new development areas?
Climate Change Mitigation	6. Reduce the contribution to climate change made by activities within Epsom and Ewell	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?
Communities and Health	7. Delivery of community infrastructure to meet the needs of all residents	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Enhance community infrastructure? • Meet the needs of a growing population? • Address the needs of all age groups and communities? • Maintain or enhance the quality of life of all residents? • Help remove barriers to activities and reduce social isolation?

SA topic	SA objective	Appraisal questions
	8. Improve the health and wellbeing of residents	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Reduce the impacts of pollution on health? • Reduce health inequalities? • Enhance the provision of, and access to, open spaces and green and blue infrastructure provision? • Improve access to green spaces for recreation? • Encourage healthy lifestyles and active travel modes, including walking and cycling?
Economy and Employment	9. Support sustainable economic development in Epsom and Ewell	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Meet local employment land requirements? • Support traditional and emerging sectors of Epsom and Ewell's economy? • Enhance the vitality of Epsom and Ewell's local centres? • Improve accessibility to employment opportunities? • Enhance training and educational opportunities?
Heritage and the Historic Environment	10. Conserve and enhance Epsom and Ewell's historic environment, including designated and non-designated heritage assets	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? • Conserve and enhance the special interest, character and appearance of conservation areas and their settings? • Conserve and enhance the special interest, character and appearance of registered parks and gardens, and their settings? • Protect and where possible, enhance the wider historic environment, including historic landscapes?
	11. Conserve and enhance Epsom and Ewell's archaeological resource	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance archaeological resource, including features listed on the Epsom and Ewell HER?

SA topic	SA objective	Appraisal questions
	12. Promote opportunities for enhancing the understanding of Epsom and Ewell's distinct historic environment	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Support access to, interpretation and understanding of the historic evolution and character of the environment? • Ensure that, where possible, development contributes to improved public understanding of assets and their settings?
Housing	13. Provide everyone with the opportunity to live in good quality, affordable housing	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Support the timely delivery of an appropriate mix of housing types and tenures? • Ensure delivery of high-quality, affordable and specialist housing that meets the needs of all residents? • Provide quality and flexible homes that meet people's needs? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Provide housing in sustainable locations that allow easy access to a range of local services and facilities?
Landscape	14. Protect and enhance the character and quality of Epsom and Ewell's landscapes, townscapes and villagescapes	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Support the distinctive qualities of the NCAs and LCAs within and surrounding Epsom and Ewell? • Protect and enhance key landscape, townscape and villagescape features which contribute to local distinctiveness? • Protect locally important viewpoints contributing to sense of place and visual amenity? • Improve understanding of Epsom and Ewell's distinctive landscape, townscape and villagescape resources?
Land and Soils	15. Ensure the efficient and effective use of land	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Avoid the loss of BMV agricultural land? • Support a brownfield first approach to new development opportunities? • Support the remediation of contaminated land? • Protect the integrity of mineral resources? • Encourage recycling of materials and minimise consumption of resources

SA topic	SA objective	Appraisal questions
		during construction, operation, and maintenance of new infrastructure?
Transport	16. Promote sustainable transport use, encourage accessibility, and reduce the need to travel	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Support the key objectives within the local transport plan and encourage more sustainable transport options? • Improve access to and quality of sustainable transport modes for all communities to encourage modal shift? • Promote improved local connectivity and pedestrian and cyclist movement? • Reduce the number of journeys made and the need to travel? • Improve accessibility to services, facilities, and amenities? • Reduce the impact on residents and the built environment from the road network?
Water	17. Manage Epsom and Ewell's water resources in a sustainable manner	<p>Will the option / proposal help to:</p> <ul style="list-style-type: none"> • Support improvements to water quality consistent with the aims of the Water Environment regulations? • Ensure that appropriate drainage infrastructure is available to serve new development areas? • Reduce pressures on wastewater treatment works and the capacity of the existing networks? • Help to minimise diffuse surface water pollution? • Protect surface water and groundwater resources? • Minimise water consumption?

15. Next Steps

Subsequent stages for the new Local Plan and SA

- 15.1 **Figure 1.1** in Section 1 highlights the stages of the SA process in conjunction with the development of the new Local Plan.
- 15.2 In association with these stages, several SA reports will be released for consultation alongside the new Local Plan at key stages of plan development. These are anticipated to include as set out in **Table 14.1** below.

Table 14.1 Key outputs for the new Local Plan and SA

Key new Local Plan output	SA output
Regulation 18 consultation on the draft version of the new Local Plan	SA report to accompany Regulation 18 consultation on the draft plan
Regulation 19 consultation on the proposed submission version of the new Local Plan	SA report to accompany Regulation 19 consultation on the proposed submission version of the new Local Plan
Submission version of the new Local Plan	SA report to accompany the submission version of the new Local Plan
The new Local Plan as modified following examination	SA report addendum
Adopted version of the new Local Plan	SA adoption statement

- 15.3 The next stage following this scoping stage will involve developing and appraising reasonable alternatives for the new Local Plan. This will consider alternative policy approaches for the plan, including relating to alternative development strategies. The findings of the appraisal of these alternatives will inform the ongoing development of the new Local Plan.

Consultation on the Scoping Report

- 15.4 Public involvement through consultation is a key element of the SA process. At this scoping stage, the SEA Regulations require consultation with statutory consultation bodies but not full consultation with the public.
- 15.5 The statutory consultation bodies are the Environment Agency, Historic England, and Natural England. The Scoping Report has been released to these three statutory consultees, in addition to Surrey County Council and nearby local planning authorities as part of the duty to cooperate.
- 15.6 Consultees were invited to comment on the content of this Scoping Report, in particular the evidence base for the SA, the identified key issues, and the proposed SA framework of objectives and appraisal questions.
- 15.7 The consultation period ran from Monday 23rd May 2022 to Wednesday 29th June 2022, considering the two bank holidays occurring in June. Comments on the Scoping Report were sent to:
- Emma Hazell, AECOM
- Email address: emma.hazell@aecom.com
- 15.8 All comments received on the Scoping Report have been reviewed and have influenced the development of the SA where appropriate.

