

# Epsom and Ewell Local Plan Examination

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**Our ref** 14836/01/SSL/SBi  
**Date** 12 September 2025  
**From** Lichfields on behalf of the Church Commissioners of England ('The Commissioners')  
**ID** 155  
**Subject** **Matter 5 The SA and approach to site selection, Plan Viability and the IDP**

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

1.1 The Commissioners' response to questions 6.6-6.17 relate to SA35 Horton Farm only.

### **Question 6.6 What is the explanation for the scoring attributed to scenario 7 in relation to the Historic Environment**

- 1.2 The Sustainability Appraisal 2024 (ref. SD05a) ('SA') sets out a framework comprising 12 topics and corresponding objectives. It assesses a range of different reasonable growth scenarios to establish an appropriate scenario to inform the Plan. The preferred scenario 5, comprises Horton Farm alongside other development sites across the borough. The Commissioners considers the SA to be both justified and effective in that Horton Farm (SA35), which comprises part of the adopted Growth Scenario, is deliverable over the Plan period. It appraises other reasonable growth scenarios 'alternatives' to determine which would achieve suitable growth when considered against key sustainability and growth objectives.
- 1.3 The objective relating to the Historic Environment in Table 3.1 confirms the Council's intention to '*Conserve and enhance the historic environment, including designated and non-designated heritage assets and archaeology; Promote understanding of the Historic Environment.*' Section 6.9 of the SA sets out the scoring of each growth scenario in turn against the Historic Environment objective. Scenario 7, which includes Horton Farm, was assigned a score of 3 with a neutral effect.
- 1.4 With regard to Horton Farm - the site is located near to a number of historic hospitals (forming designated conservation areas) which have been converted into residential developments, and that there is a Grade II Listed farmhouse building on site. The Commissioners agrees with the SA assessment that the site does not contribute significantly to appreciation of the nearby conservation areas as a whole, and is of the view that the surrounding historic environment context presents an exciting opportunity to reforge that heritage.
- 1.5 The historic hospital cluster of residential neighbourhoods are presently relatively isolated from the rest of Epsom and Ewell, and the vision and initial masterplanning work for Horton Farm demonstrates the sites potential to deliver better connectivity for this part of

the Borough and provide a central hub for surrounding communities. Sensitive masterplanning of the site will also carefully consider the setting of the Listed farmhouse to inform the design of the site from the earliest stage. It is noted that Historic England did not raise any concerns through the Regulation 18 or 19 consultations.

- 1.6 Overall, the Commissioners finds the Historic Environment scoring attributed to Scenario 7 in relation to Horton Farm as being robust and recognise the Council's note that there is scope to enhance the setting and preserve the significance of these heritage assets through the development of SA35, at the planning application stage.

## **Question 6.9 Have the individual site allocations been chosen according to a robust site selection methodology?**

- 1.7 Paragraph 32 of the NPPF (2023) requires Local Plans to be informed throughout their preparation by a sustainability appraisal (SA) that meets the relevant legal requirements. It states significant adverse impacts on the objectives should be avoided and suitable mitigation measures should be proposed. Paragraph 35 states that in order for a plan to be sound it should be justified by an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence.
- 1.8 The Council's SA methodology is thorough and considers the Council's objectives against a list of potential impacts. It robustly ranks the growth scenarios in order of performance and categorises effects from significant negative to neutral to significant positive effect. The appraisal methodology seeks to identify a growth scenario which avoids significant adverse impacts.
- 1.9 Overall, particularly in the case of Horton Farm, the Commissioners agrees the adopted site selection methodology is robust, consistent with Framework and is therefore justified when identifying individual site allocations.

## **Question 6.10 The PPG advises that, when preparing strategic policies, it may be concluded that insufficient sites / broad locations have been identified to meet objectively assessed needs, including the identified local housing need. It goes on to advise that strategic policy-making authorities will need to revisit their assessment, for example to carry out a further call for sites, or changing assumptions about the development potential of particular sites. This may include applying a range of densities that reflect the accessibility and potential of different areas, especially for sites in town and city centres, and other locations that are well served by public transport. Have the Council completed this exercise?**

- 1.10 The Commissioners notes the Council has considered a range of sites through the call for sites, site selection and SA process and identifies appropriate density targets for different sites within the supporting text (para 7.2) of draft Policy S11 (Design). The Commissioners supports the recommended density ranges in the draft Plan, which include the consideration of a site's public transport accessibility. As set out in the Commissioners'

response to Matter 7 and 11 on density– the Horton Farm site is well connected by public transport and it is agreed that the density standards in the Plan would represent a significant uplift in the average density in the Borough, in line with the NPPF (2023, 129 a and b). Please refer to Matter Statement 4 (question 5.5) which sets out the accessibility and sustainability benefits of the site. The site at Horton Farm is considered deliverable and achievable within the Plan period (in accordance with NPPF (2023) definition).

**Question 6.11 Have all reasonable alternatives been considered in terms of the spatial strategy, policies and sites including increases in density or the housing proposed over the plan period?**

- 1.11 See above on density (and refer to Matter 7 and 11 responses). The Plan has considered reasonable densities to assess appropriate capacity of identified sites.
- 1.12 The site allocation at Horton Farm will make a significant contribution to the delivery of housing across the Plan period through the provision of approximately 1,250 homes, which is recognised within the SA.

**Question 6.12 Are the allocated sites identified at Chapter 4 of the Plan (Planning for Places) including the size and mix of uses proposed justified and in what way do they reflect the outcomes of the SA and testing of reasonable alternatives through the site selection methodology?**

- 1.13 The site allocation at Horton Farm is justified in terms of housing delivery (approximately 1,250 homes) and mix of uses and this is demonstrated through the Council's published evidence base, as well as the masterplan prepared by the Commissioners, and submitted in the form of the Vision Document with the Regulation 19 Representations. As set out in Matter Statement 11, SA35 will deliver a range of homes including much needed family affordable homes. The site allocation also supports the provision of specialist housing, gypsy and traveller pitches alongside supporting infrastructure. The Commissioners therefore considers SA35 to be justified and to robustly reflect the conclusions of the SA.
- 1.14 The SA provides an assessment of the likely social, economic and environmental effects of the growth scenarios considered throughout the process. In doing so, the SA assesses the Commissioners' Horton Farm Site (SA35). Overall, the Commissioners support the assessment within and conclusion of the SA (SD05a), which demonstrates and justifies Horton Farm to be a sustainable site for strategic scale release to meet housing needs, this includes (inter alia):
  - Sustainability and accessibility: the Commissioners supports the recognition in the SA (para 6.22, bullet point 1) that the site is considered to be *'well-located from an accessibility perspective in terms of: A) integrating with and complementing recently redeveloped areas within the former hospital cluster; B) accessing the town centre; and C) accessing neighbourhood retail areas.'*
  - Transport – the SA states (para 9.13.2) that the site at Horton Farm is *'broadly supported from a transport perspective'*, and the site *"...has reasonable train and bus*

*connectivity, with work having established that there is the potential to divert two bus services into the site*". Similarly, the transport and highways report, prepared by Pell Frischmann, submitted with the Regulation 19 representations concludes, the site is considered to be located in a good location, in terms of transport, for a residential-led development and provides many opportunities to prioritise active and sustainable modes of transport, as well as improve the connectivity of adjacent residential areas to the walking and cycling network.

- Community infrastructure - the SA rightly notes that there is a need to deliver new and upgraded community infrastructure capacity, to the benefit of the new and existing communities. The SA states (6.22, bullet point 1) it is the Council's current understanding that there is no requirement for the Horton Farm site to deliver a primary school and that there is sufficient capacity to accommodate growth from the site– this aligns with the Commissioners' previous discussions with Surrey County Council on this matter. SA35 includes a community building, with the potential for this to be used for early years – this would align with the Surrey County Council response, (ref. 135). The SA states that the current expectation is that the site will deliver a health facility 'although discussions are ongoing.' The Commissioners remain open to this should a local need be identified at the time of a planning application (see Matter 11 and Matter 6 statement). It is noted that the representation from the NHS (166) raised no concerns in respect of health provision and stated that new development should make a proportionate contribution to funding the healthcare system arising from new development.
- Green Belt – as set out in response to Matter 4 and Matter 11, the Commissioners fully support and agree with the Council's conclusion that exceptional circumstances exist to release land from the Green Belt, in alignment with national planning policy. The Commissioners support the recommendation in the SA for the strategic release of the site at Horton Farm, indeed, paragraph 5.4.19 recognises that the site represents 'a near-unique opportunity to deliver a strategic scale scheme...'. Paragraph 5.4.19 states that [Horton Farm] *'is sensitive, but this sensitivity potentially reduces once account is taken of adjacent Green Belt comprising redeveloped former hospitals sites and Horton Country Park'*. Tor&Co (the Commissioners' appointed consultant on Green Belt) consider that the site's location in proximity to these areas of development which are to be inset from the Green Belt, mean that allocation of the site would round off the settlement edge. Therefore, the parcel can accommodate growth without harm to the remaining Green Belt and establish a strong Green Belt boundary that will endure beyond the next Local Plan period – please see Matter 4 Statement.
- Air Quality – the SA (6.3.3) identifies that 'there is a primary school adjacent to Horton Farm, which is a 'sensitive receptor'. Southfield Park Primary School is located to the southern corner of the site, on the opposite side of Chantilly Way. It is not envisaged that development of the site would lead to adverse air quality impacts on the adjacent school due to the range of vehicular access options proposed, as well as series of pedestrian and cycle connections, with the primary access to be located on Horton Lane. In any event, there is good potential to avoid and mitigate any adverse impacts through collaborative masterplanning and effective design measures, and the

development of an appropriate construction and environmental management plan will consider any sensitivity in this part of the site.

- Climate change adaptation (Flood Risk) – the SA (para 6.5.2) refers to an area of surface water flood risk within the site, but that this is ‘localised’ and there is likely potential to avoid built form in the flood risk area (i.e. integrate the flood risk area as part of a green/blue infrastructure strategy) and deliver high quality Sustainable Drainage Systems (SuDS). However, paragraph 5.4.19 of the SA also refers to there being ‘issues / constraints’ with respect to surface water flood risk. Whilst the Commissioners recognise surface water flood risk to be a constraint that must be fully considered in the development of this site, on the advice of the Commissioners’ appointed flood risk consultants, Pell Frischmann, it is a constraint that can be fully mitigated through the masterplan approach and sustainable drainage strategy. Further, the SA considers there may be some ‘tensions’ with landscape/visual impacts and the surface water flood risk channel associated with Horton Lane. As confirmed in the Matter 11 statement, the current masterplan for Horton Farm has been designed in line with the recommendations of the Council’s Level 2 SFRA, and national policy – built development and access points have been directed away from the areas of surface water flood risk. The Commissioners support the statement at 7.2.1 ‘... whilst Horton Farm intersects a surface water flood zone there is ample opportunity to leave land at risk undeveloped as blue / green infrastructure.’ Further assessment of landscape/visual impact would need to be undertaken at the appropriate planning application stage, however this has not been identified as a constraint to development by the Commissioners, at this stage. Indeed, the SA (para 6.12.1) considers that concentrating new homes here would be a means of delivering new homes in a way that minimises landscape impacts.
- Landscape – the SA recognises that the landscape challenges for Horton Farm are fairly limited, with widespread views into the site from adjacent roads and associated pedestrian/cycle paths filtered by hedgerows, and extensive views into or across the site unlikely to be of particularly high value. The Commissioners support the recognition that Horton Farm is a relatively unconstrained location (para 9.4.6) and development at the site can deliver improved, wider landscape enhancements and establish a strong Green Belt boundary, adjacent to existing residential areas and lowering the risk of adverse landscape impacts.
- Biodiversity - The SA (6.4.2, bullet point 4) notes that Horton Farm, is subject to limited biodiversity constraints, and the potential to deliver targeted onsite biodiversity gains can be envisaged. The SA recognises the proposed masterplan layout which will mitigate the site’s proximity to Horton Country Park SNCI. This is agreed and supported by the Commissioners. The Commissioners will maximise the delivery of BNG for Horton Farm in line with National Requirements, but do not consider the request for 20% BNG to be sound – please refer to the Matter 8 statement.
- Historic Environment – as above (see question 6.6), the Commissioners agree with the SA assessment (para 6.9.1, bullet point 3) that the site does not contribute significantly to appreciation of the conservation areas as a whole, and are of the view that the

surrounding historic environment context presents an opportunity to reforge that heritage.

- 1.15 In sum, as required in the NPPF (2023), Horton Farm is a sustainably located site, which does not perform as strongly in terms of the Green Belt functions and where there are clear Green Belt defensible boundaries. The site can deliver approximately 1,250 homes, including specialist housing and other uses as per the draft allocation. This will make a significant contribution to housing delivery across the Plan period. The SA notes that *“delivering Horton Farm, which is crucially important in a number of respects but not least given the potential to deliver a mix of housing...”* The Commissioners fully agree with this statement.
- 1.16 Overall, growth scenario 5 was scored 1-2 (1-7 being the order of preference) against 11 of the 12 objectives within the SA, excluding housing delivery which scored 3. Horton Farm was supported for inclusion in the adopted growth scenario due to its strong performance in terms of accessibility, transport connectivity, housing and specialist housing delivery. The Commissioners agree with the conclusions of the SA and support the allocation of the site within the Plan and consider this to be justified.

**Question 6.13 Does the evidence demonstrate that there is a realistic prospect that each of the allocations will be deliverable within the Plan period? If this is not the case, is the allocation justified?**

- 1.17 Yes, there is a commitment from the Commissioners to commence delivery of SA35 from 2030/1 as set out in the trajectory at Table 1 of the Statement of Common Ground. The Commissioners have a strong track record of bringing sites forward for delivery across England including at:
- Finberry, Ashford - development of 1,100 new homes to create a new Kentish village to the south of Ashford town centre with development partner, Crest Nicholson, with a new nursery and primary school, which have opened;
  - Ely, East Cambridgeshire - the land forms part of North Ely site allocation for 3,000 homes. The first phase (200 homes) has been delivered by Redrow and the second phase of 600 homes is due to come forward imminently; and,
  - Paston Reserve, Peterborough - construction of 666 new homes delivered by Keepmoat alongside a primary school and secondary school with a final phase to come forward.
- 1.18 There is the same level of commitment here at Horton Farm. This trajectory is reflective of the Local Plan Housing Trajectory. Annex 2 of the NPPF (2023), sets out a definition of ‘Deliverable’. To be considered deliverable *‘sites for housing should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on site within five years.’* Horton Farm is available, as confirmed by the Commissioners, is in a suitable/sustainable location, as confirmed by the SA and set out in response to Matter 4 (question 5.5), and will be deliverable in the Plan period.

**2.0 Plan viability/ Issue 7: Does the viability evidence which supports the Plan demonstrate that the plan policies are viable**



**and does the IDP explain what infrastructure will be required and when?**

**Question 7.1 Has the viability assessment been prepared in accordance with national policy and guidance?**

- 2.1 Yes, the Commissioners viability consultant Savills considers the Council's viability assessment has been prepared in accordance with national policy and guidance.

**Question 7.2 Have all the necessary policy requirements been taken into account?**

- 2.2 Yes, the Commissioners viability consultant Savills considers the necessary policy requirements have been taken into account.

**Question 7.3 To what extent does the evidence base demonstrate that the requirements of policy S6 concerning the delivery of affordable housing are viable?**

- 2.3 The appraisal undertaken within the Local Plan viability assessment considered the impact of the policy S6 reflecting the quantum of affordable housing and tenure mix the policy proposes. The viability assessment concluded all of the strategic sites, including Horton Farm were viable whilst delivering the requirements of this policy. Savills agree with these conclusions.

**Question 7.4 What has been used to inform the typologies selected and are these reflective of the growth planned within the borough?**

- 2.4 The typologies selected comprises a mix of brownfield, greenfield and high density sites of different sizes which mirror the various forms of development which will take place across the Borough. The strategic allocations have been assessed separately with appraisals which directly reflect the quantum and form of development which is proposed on each individual site. These are agreed by Savills.

## **The IDP**

**Question 7.6 7.6 I note that document COUD\_001 lists key infrastructure at table 5 – the timescale column as indicated is in my view too vague. Document ISO1 summarises infrastructure requirements over the plan period. However, it is not clear from the items listed when they are expected to be delivered over the plan period. Please could the Council provide greater clarity in relation to the infrastructure required over the plan period, and when this is expected to come forward. The Council can do this by setting out what infrastructure is expected to come forward during years 1-5, 6-11 and 11 plus of the Plan period, relating this to the housing trajectory at appendix 2 and how this relates to the site allocations proposed by the Plan.**

2.5 Agreed. The Commissioners consider that the timescales and infrastructure requirements for each site allocation are not clearly set out within the IDP and the Council should clarify this.

Word count: 2,797