

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

SD05b

## SA Report Non-technical Summary

December 2024



# Introduction

AECOM is leading on the Sustainability Appraisal (SA) process for the emerging Epsom and Ewell Local Plan being prepared by Epsom and Ewell Borough Council.

Once in place, the Local Plan will set a strategy for growth and change for the period to 2040, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. Local Plans must be subject to SA.

Central to the SA process is preparation of an SA Report for publication alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives”.

At the current time, the SA report is published alongside the ‘proposed submission’ version of the Local Plan, under Regulation 19 of the Local Planning Regulations (following an ‘interim’ report having been published alongside an early draft of the plan in 2023).

This is the Non-technical Summary (NTS) of the SA Report.

## Structure of the SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SA involved **up to this point**?

- including in relation to ‘reasonable alternatives’.

2) What are the SA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn below. Before doing so, there is a need to set the scene further by answering the question: *What’s the scope of the SA?*

## What’s the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives. Taken together, this list provides a methodological ‘framework’ for appraisal.

The following topics comprise the core of the SA framework:

- Accessibility
- Air quality
- Biodiversity
- Climate change adaptation
- Climate change mitigation
- Communities and health
- Economy and employment
- Historic environment
- Housing
- Land and soils
- Landscape
- Transport
- Water

## Plan-making / SA up to this point

Two key steps in the required SA process are: A) appraise reasonable alternatives in time to inform development of the draft plan; and then B) publish information on reasonable alternatives as part of the draft plan consultation.

As such, Part 1 of the SA Report explains work undertaken in 2024 to develop and appraise a reasonable range of “growth scenarios”, essentially in the form of alternative key diagrams, i.e. alternative approaches to development where each is ‘reasonable’ in terms of providing for development needs and delivering on wider plan objectives.

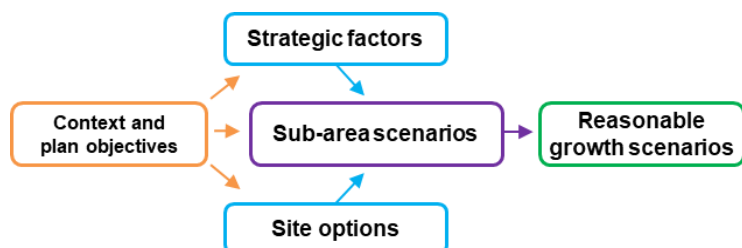
A focus on growth scenarios ensures a focus on the choice at the very heart of the plan. Furthermore, it ensures a focus on alternatives that are meaningfully different in terms of ‘significant effects’ (it being a requirement for SA to focus on significant effects).

In short, the process of exploring growth scenarios involved: **1)** defining growth scenarios; **2)** appraising growth scenarios; and then **3)** feeding-back to inform the draft plan.

## Defining growth scenarios

Section 5 of the main report explains the process of defining reasonable alternative growth scenarios for appraisal and consultation. Figure A provides an overview.

**Figure A: Process overview**



### Context and plan objectives

Plan-making has been underway since 2017, but a key milestone was reached in 2023 when the Council consulted on a Draft Local Plan. The consultation provides key context to defining reasonable growth scenarios, but there have also been some significant shifts to the context since that time. In particular, context comes from the new National Planning Policy Framework (NPPF) published on 12<sup>th</sup> December 2024. The New NPPF does not apply to plans submitted by 12<sup>th</sup> March 2025, and so is not expected to apply for the purposes of the current Local Plan, but there is nonetheless a need to account for the national Government's planning reform agenda. One implication of the reform agenda is increased pressure to provide for local housing need in full, or as far as possible. Another implication is that there is an urgent need to progress a new Local Plan in order to avoid a situation whereby the adopted Local Plan is deemed out-of-date such that the presumption / tilted balance in favour of development applies when considering planning applications. There is also more generally an urgent need for an up-to-date Local Plan so that it can deliver on defined objectives, for example in respect of affordable housing.

### Strategic factors

Section 5.2 of the main report gives consideration to:

- **Quantum** (*how much?*) – focusing on housing, Local Housing Need (**LHN**) stands at 10,242 homes over the plan period (2022-2040), on the basis of the Government's standard method as it stood prior to the 12<sup>th</sup> December announcements. Whilst there is also the context of the new need figure published on 12<sup>th</sup> December, which is 56% higher, this does not apply for plans submitted by 12<sup>th</sup> March 2025.

Furthermore, unmet housing need is a major issue across the wider the sub-region, and the NPPF is clear that local plans should seek to provide for unmet need.

- **Broad spatial strategy** (*where and how?*) – discussion in the main report firstly considers the urban area, introducing work that has been undertaken to ensure that supply is maximised within reason, before going on to focus attention on sub-areas within the Green Belt. Four sub-areas are defined as having potential for housing growth – west, south, east and northeast – after having accounted for Green Belt sensitivity (Figure B) and other factors including land availability and constraints such as Epsom Common SSSI, Horton Country Park, Epsom Downs and local wildlife sites.

A key point to note from Figure B is that the number of homes that can be delivered at sites that make a limited contribution to Green Belt purposes is very low. There is then one parcel with a total score of 6 that is available for development and so must be given detailed consideration. The remaining Green Belt site options that are available and feasibly in contention for allocation then score of either 7 or 8 but must be explored in detail nonetheless, given: A) the stretching nature LHN figure; B) the need avoid or minimise unmet housing need; and C) limited non Green Belt supply.

Three further broad spatial strategy considerations are explored within the main report, namely: 1) strategic sites – have merit in that they represent an effective means of delivering infrastructure and other benefits to the local area alongside housing; 2) a good mix of sites is important, in terms of geographic location and type, and to include a good proportion of smaller sites able to deliver early and with low delivery risk; and 3) clusters of sites – can sometimes deliver benefits in terms of placemaking, infrastructure delivery (e.g. cycle infrastructure) and bus services.

### Site options

Section 5.3 of the main report introduces the Land Availability Assessment (LAA), which establishes: A) a shortlist of urban site options; and B) a long list of Green Belt site options.

### Sub-area scenarios

Section 5.4 considers the urban area and then the four aforementioned Green Belt sub-areas in turn. Under each heading the aim is to consider the merits of site options (in isolation and in combination) in the context of strategic factors before concluding on sub-area scenarios in the form of alternative combinations of site allocations, to progress to the final stage in the process, namely defining growth scenarios for the Borough.

Figure C shows that some sites are progressed as 'constant' and others as a 'variable'.

Figure B: Overall contribution to Green Belt purposes with ‘sub-areas’ overlaid

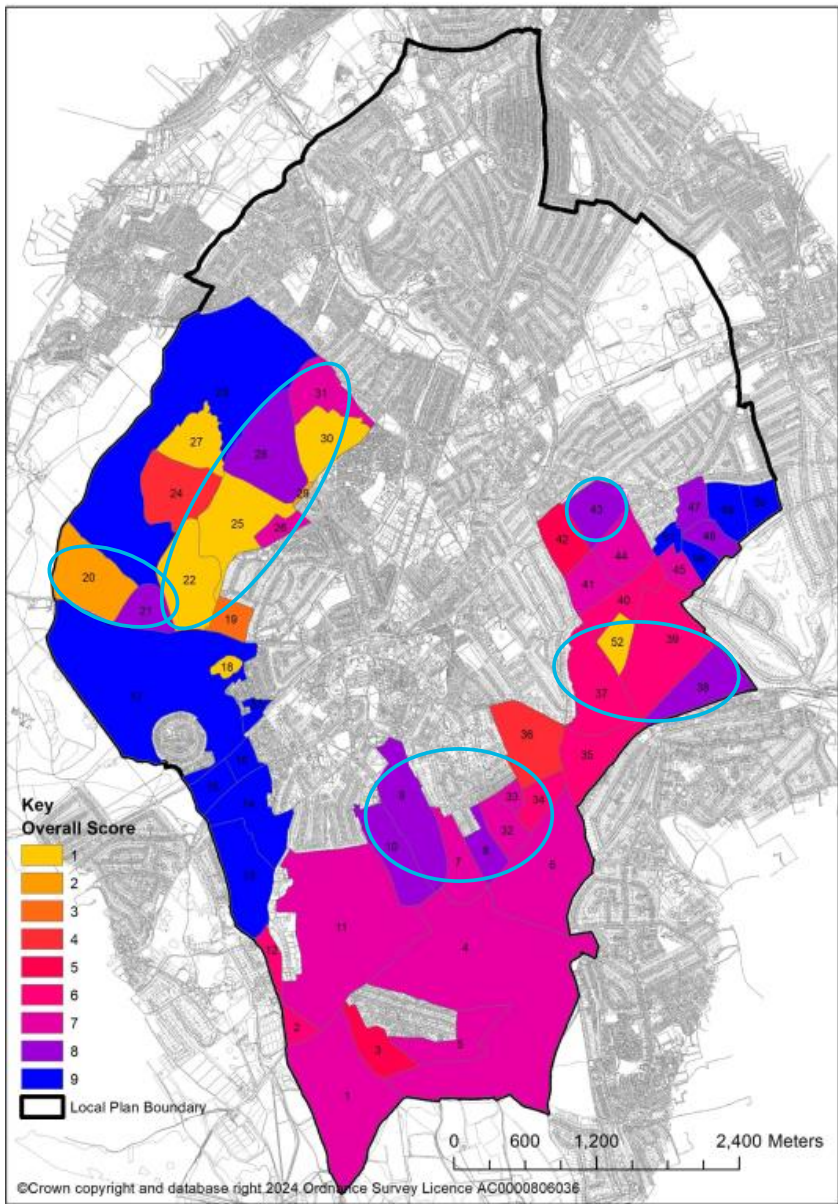
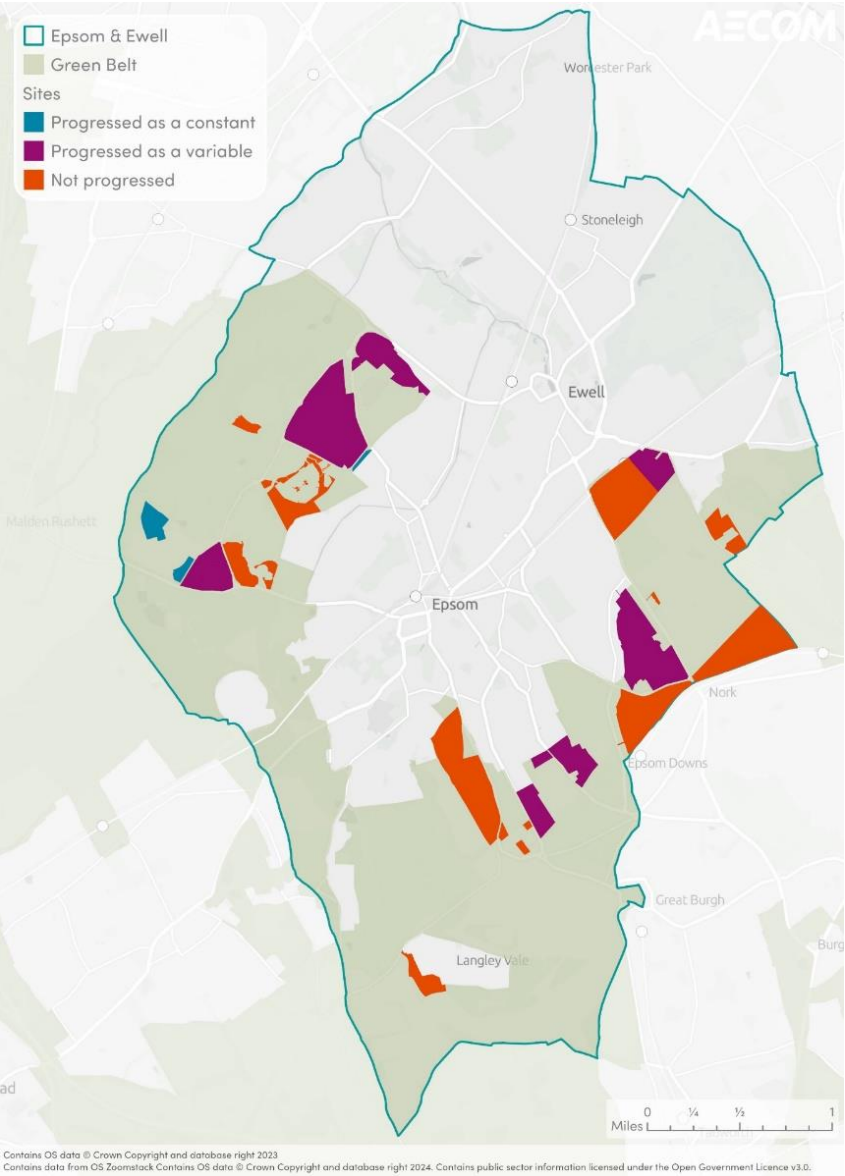


Figure C: Green Belt sites progressed / not progressed to the growth scenarios (Section 5.5 of the main report) following analysis of sites by sub-area (Section 5.4)





### District-wide growth scenarios

Section 5.5 identifies reasonable combinations of the sub-area scenarios that then form the reasonable growth scenarios for the Borough. There are many feasible combinations, but there is a pragmatic need to keep the scenarios to a manageable number. There is also a need to factor-in that certain of the sub-area scenarios are supported above others, notably: A) in the west sub-area there is limited case for either the lowest growth scenario or the highest growth scenario; and in the northeast sub-area there is limited case for the higher growth scenario. Having applied these rules, seven growth scenarios are defined.

In summary, the reasonable growth scenarios are as follows:

- Scenario 1 – lowest reasonable growth scenario
- Scenario 2 – Scenario 1 plus Hook Road Arena (HRA)
- Scenario 3 – Scenario 2 plus South Cluster (SC)
- Scenario 4 – Scenario 2 plus Downs Farm (DF)
- Scenario 5 – Scenario 2 plus Horton Farm (HF)
- Scenario 6 – Scenario 2 plus SC, DF and HF
- Scenario 7 – Scenario 6 plus two further sites

**Table A:** The reasonable growth scenarios (with constant supply components greyed-out)

Sub area	Site(s)	1	2	3	4	5	6	7
Completions, permissions, windfall		1,918	1,918	1,918	1,918	1,918	1,918	1,918
Urban	Non Green Belt	1,416	1,416	1,416	1,416	1,416	1,416	1,416
West	Hospital Green Belt PDL	200	200	200	200	200	200	200
West	Chantilly Way	30	30	30	30	30	30	30
West	Hook Road Arena		100	100	100	100	100	100
South	COL017, 019, 023			310			310	310
East	Downs Farm				675		675	675
West	Horton Farm					1,250	1,250	1,250
West	Noble P ext. / Hollywood L.							150
NE	Adj. Ewell East St.							350
<b>Total housing supply</b>		<b>3,564</b>	<b>3,664</b>	<b>3,974</b>	<b>4,339</b>	<b>4,914</b>	<b>5,899</b>	<b>6,399</b>

**Figure D:** The reasonable alternative (RA) growth scenarios

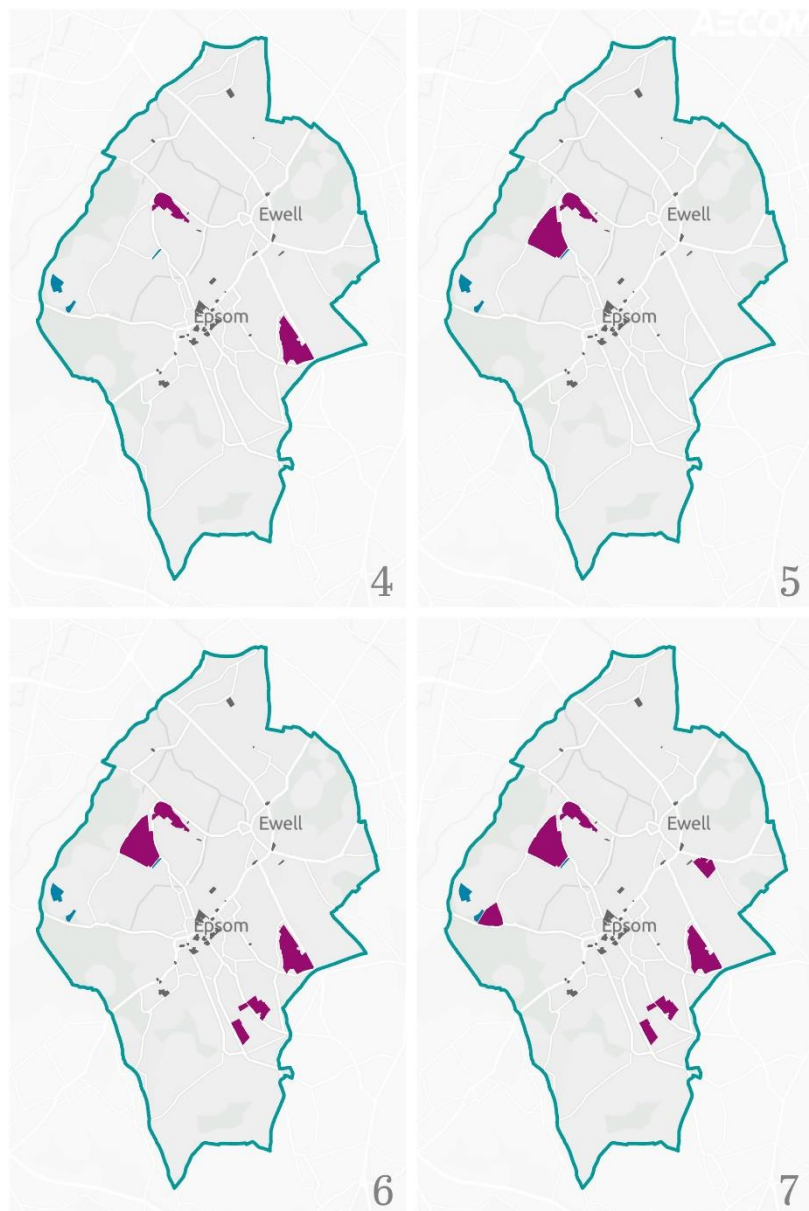
### Reasonable Alternative Growth Scenarios

- Epsom & Ewell
- Non-Green Belt site
- Constant Green Belt site
- Variable Green Belt site

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Figure D: Continued



## Growth scenarios appraisal

The table (or 'matrix') below presents a summary of the appraisal of reasonable growth scenarios presented above. The table includes a row for each component of the SA framework (introduced above), and within each row, the aim is to **1)** rank the scenarios in order of performance (with a star indicating best performing and "=" used where it is not possible to differentiate with confidence); and then **2)** categorise performance in terms of significant effects using **red** (significant negative) / **amber** (moderate/uncertain negative) / **light green** (moderate/uncertain positive) / **green** (significant positive) / no colour (neutral).

The appraisal shows a mixed picture, but **Scenario 1** is clearly shown to have drawbacks. Having said this, the conclusion is not necessarily that this is the worst performing scenario overall. That is because the appraisal is not undertaken with any assumptions made regarding the degree of importance / weight that should be assigned to each of the topics (such that the intention is not that the matrix should be used to calculate a total score for each of the scenarios and, in any case, any attempt to do so is complicated by a need to account for both order of preference and conclusions reached on significant effects).

Also of note are the appraisal conclusions for the highest growth scenarios, namely **Scenarios 6 and 7**. The appraisal highlights significant arguments for and against higher growth (albeit recalling that even the highest growth scenario appraised would generate significant unmet housing need), and it is for the Council to weigh these pros and cons in the balance before reaching a conclusion on how these scenarios perform overall relative to the lower growth scenarios. The other point to note regarding the higher growth scenarios is that the appraisal conclusion under several of the topic headings reflects an assumption that minimising unmet need is very important for the achievement of sustainability objectives, given the challenges involved with / barriers to providing for unmet need from Epsom and Ewell elsewhere within a constrained sub-region.

As a final point, it is appropriate to note that there are other scenarios falling in between those appraised that were not defined and appraised as a pragmatic step (as discussed) and because of a lack of confidence that the appraisal would lead to meaningful differentiation in terms of significant effects. In particular, there are three 'missing' scenarios in between Scenarios 5 and 6, involving Scenario 2 plus two out of Horton Farm, Downs Farm and the 'Southern Cluster'. In light of the appraisal, it is fair to say that, of these three missing scenarios, attention focuses on a scenario involving Scenario 2 plus Horton Farm and Downs Farm.

**Table B: Growth scenarios appraisal**

Scenario	1 Low growth	2 Scen 1 + HRA	3 Scen 2 + South Cluster	4 Scen 2 + Downs Farm	5 Scen 2 + Horton Farm	6 Scen 2 + SC, DF, HF	7 Scen 6 + two sites
Topic	Order of preference (numbers) and predicted effects (shading)						
Accessibility	5	4	3	2	1	1	2
Air quality	3	2	2	1	1	1	1
Biodiversity	3	2	2	1	1	1	3
CC adaptation	1	1	1	1	2	1	1
CC mitigation	2	1	1	1	1	1	1
Communities	2	1	1	2	2	3	3
Economy	7	6	5	4	3	2	1
Historic env.	2	1	1	1	1	1	3
Housing	7	6	5	4	3	2	1
Land & soils	2	1	1	1	1	1	1
Landscape	2	1	4	3	1	5	5
Transport	4	3	3	2	1	3	2
Water	2	2	1	1	1	2	2

## The preferred approach (text provided by EEBC officers)

The following statement explains EEBC Officers' reasons for supporting **Scenario 5**:

"Providing for housing needs is a key issue, and providing for affordable housing needs in particular is a key local priority. Unmet housing need leads to a wide range of issues, at the local and wider sub-regional scale. However, the appraisal serves to highlight a range of drawbacks to higher growth, hence the plan follows a middle path, striking a balance across competing sustainable development objectives.

In particular, the appraisal serves to highlight significant drawbacks to Scenario 1, and we believe that significant weight can be attributed to these drawbacks, such that Scenario 1 is judged to perform poorly overall. There is a clear need to take steps to minimise unmet housing need as far as possible, not least because of the levels of affordable housing need that exist locally, which is a figure many times higher than the 30 homes affordable homes per annum delivery figure that the Borough has averaged over the past six years. Furthermore, minimising unmet housing need is important from wide-ranging other perspectives, including from a perspective of supporting the local and sub-regional economy and supporting the achievement of transport, decarbonisation and certain environmental objectives.

From the appraisal it is apparent that Scenario 4 also performs reasonably well, but there is clear evidence that Scenario 5 is preferable, particularly once account is taken of the precautionary nature of the appraisal conclusion under 'climate change adaptation'. Specifically, whilst Horton Farm intersects a surface water flood zone there is ample opportunity to leave land at risk undeveloped as blue / green infrastructure.

Under Scenario 4 Horton Farm is substituted for Downs Farm, but it is recognised that there is also a 'missing scenario' (omitted from the appraisal for clear reasons discussed above) whereby Downs Farm is allocated in addition to Horton Farm (i.e. a scenario in-between Scenarios 5 & 6). This omitted scenario would likely perform similarly to Scenario 6 (a higher growth scenario) but better than Scenario 6 under the 'Landscape' topic heading (because it would not involve allocation of the 'southern cluster').

With regards to Scenario 3, it is difficult to see how this scenario could justifiably be supported ahead of either Scenario 4 or Scenario 5, although it is noted that one of the cluster of three sites is proposing to make a very significant area of land available for publicly accessible green infrastructure. Also, it is recognised that whilst the appraisal assumes that the cluster of three sites would come forward in combination, in practice there is the potential to allocate just one of the sites, or two of the three.

With regards to Scenario 2, whilst the appraisal does not flag significant concerns other than in one respect (housing, which is a significant concern for all scenarios), it should be noted that this scenario is judged by the appraisal to perform relatively poorly under most of the appraisal topic headings. It is also important to emphasise a risk that this could well be seen as not representing a suitably proactive approach to providing for local housing needs. This is in context of a sub-region where unmet need is already a major issue and in the context of a Government focused on addressing the housing crisis and delivering economic growth. Alongside this, it is also important to recall that the Government has recently communicated to the Planning Inspectorate that they should reject plans that are fundamentally unsound.

Finally, with regards to the higher growth scenarios (i.e. Scenarios 6 and 7), whilst the effect would be to close the gap to LHN / reduce unmet housing need, a key issue is clearly impacts to the Green Belt with resulting implications for wide-ranging objectives (including landscape, biodiversity and communities), plus there would be a need to allocate some sites in less accessible locations. The appraisal also recognises that there would be a risk of significant local objection such that the plan struggles to progress (or, at least, progress in a timely fashion, in the context of an urgent need to adopt a Local Plan). There is also a specific issue with one of the sites that features only under Scenario 7, namely Land adjacent to Ewell East Station, specifically that only parts of the site are in the control of the freeholder, meaning that the availability and deliverability of the wider site cannot be confirmed at the current time (and it is important that the Local Plan only commits to delivering sites where availability is confirmed).

Overall, whilst the choice between growth scenarios is challenging, in light of the discussion above Scenario 5 is considered to be justified (NPPF paragraph 35) in that it is *“an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”*.

## SA findings at this stage

Part 2 of the SA Report presents an appraisal of the Local Plan as a whole. In practice, this is an opportunity to adjust the appraisal conclusions presented above for Scenario 5 taking into account development management policies (both are-wide and site-specific).

### Appraisal of the Proposed Submission Local Plan

The appraisal conclusion is as follows:

- **Positive effects** – whilst the appraisal does not predict any significant positive effects, ‘moderate or uncertain’ positive effects are predicted under four headings: Accessibility (because the plan has a good focus on directing growth so as to deliver or otherwise support access to community infrastructure); Communities (recognising that the plan seeks to strike a careful balance between arguments for and against growth and has been iterated over a number of years including in light of consultation); Economy and employment (because the Local Plan will ensure that identified employment needs are met over the plan period, in particular by protecting and enhancing existing established key employment areas); and Transport (because growth is mostly directed to locations with good accessibility and connectivity credentials, albeit generating unmet housing need is not supported from a transport perspective).
- **Negative effects** – the only predicted negative effect is under the Housing topic heading. Here the conclusion is a ‘moderate or uncertain’ effect, but this is marginal, i.e. there is a case for predicting a ‘significant’ negative effect. This is because the Local Plan will generate significant unmet housing need, although it is recognised that there are also many clear reasons to adopt the Local Plan, from a housing perspective, including with a view to setting clear policy requirements for housing mix and affordable housing and delivering Horton Farm, which is crucially important in a number of respects but not least given the potential to deliver a mix of housing, specialist housing and Gypsy and Traveller pitches.
- **Neutral effects** – this is the conclusion under the remaining eight topic headings. This includes the key topic heading of Landscape, with the conclusion reflecting an understanding that the baseline situation is one whereby the Borough’s Green Belt could come under pressure in the absence of an up-to-date local plan under the presumption in favour of sustainable development. Finally, with regards to climate change mitigation, whilst a concern with the proposed strategy / allocations is flagged through the appraisal of RA growth scenarios, the appraisal of the Local Plan as a whole is able to conclude a neutral effect because the proposal is to require net zero development (to an exacting standard), which is a notable evolution from the Draft Plan stage and reflects detailed work to consider Whole Plan Viability.

There will be the potential to make improvements to the plan through the forthcoming examination in public (although any changes must be with a view to addressing a soundness issue, as opposed to simply improving the performance of the plan). A small number of recommendations are made within the main report; however, it is inherently difficult to confidently make recommendations because actioning them will have implications that are difficult to foresee and account for here.



For example, whilst it would be easy to recommend further policy stringency in respect of biodiversity net gain, this would have cost/viability implications such that there could be a need to accept trade-offs in respect of wider objectives (e.g. affordable housing or net zero). Equally, whilst it is easy to suggest the possibility of further site-specific policy, this takes time and resources, and there is always a risk of being overly prescriptive, such that there is reduced flexibility at the DM stage, potentially impacting delivery.

## Cumulative effects

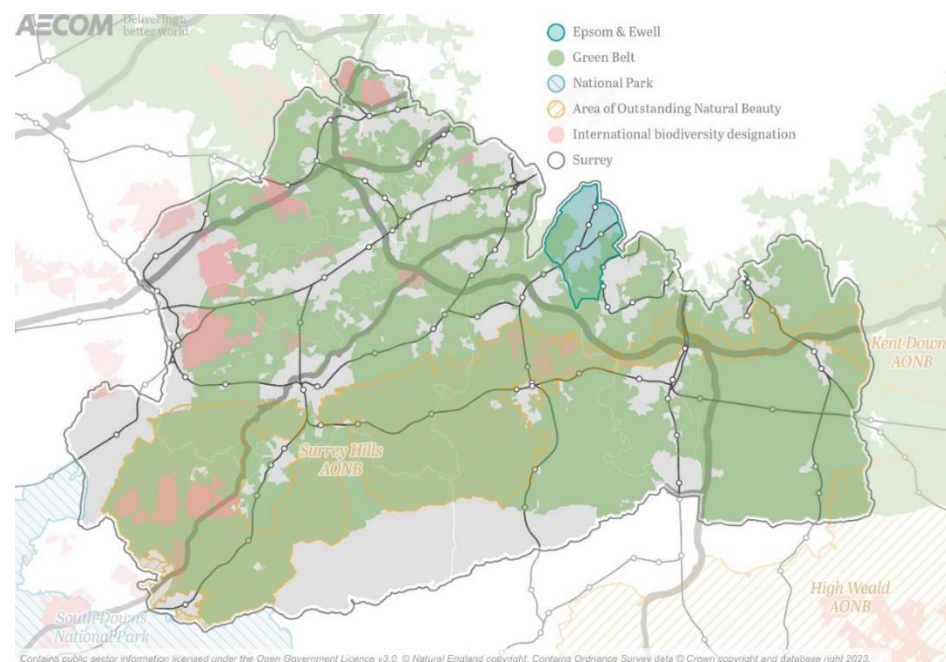
The regulations underpinning the SA process indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the Local Plan in combination with other plans, programmes, etc. In practice, this is an opportunity to discuss potential 'larger than local' effects and, for Epsom and Ewell, a key issue is the question of whether, where and when unmet housing need will be provided for.

Figure E shows a selection of key sub-regional issues and constraints that create a challenge in respect of meeting unmet need from Epsom and Ewell. The figure serves to highlight key constraints including the Thames Basin Heaths SPA and the Surrey Downs National Landscape (formerly Area of Outstanding Natural Beauty). Wider environmental challenges include national and local biodiversity designations (e.g. landscapes associated with very high densities of ancient woodland in south Surrey); local landscape designations (including the Area of Great Landscape Value, AGLV, within Surrey); and the 'water neutrality' constraint that is a major barrier to growth at Crawley, Horsham and other locations in the Sussex North Water Resource Zone. It should also be noted that land beyond the Green Belt within West Surrey is almost entirely urbanised, associated with the A331/ Blackwater Valley.

Furthermore, there is a need to consider locations other than Epsom and Ewell where unmet housing need is an existing or likely / potential future issue, and locations where plan-making work to date serves to evidence a conclusion that there is little or no realistic potential to provide for unmet needs. It is beyond the scope of this brief note to present a detailed review, but the issues are significant. For example, the Mole Valley Local Plan was recently adopted generating unmet need, and the recent conclusion of the Elmbridge Local Plan EiP serves to demonstrate that providing for need in full is a major challenge.

In summary, Surrey is a key scale at which to deal with unmet need, but there are no clear mechanisms in place, and inherent challenges. Overall, it is difficult to suggest how, where or when provision might be made for unmet need from Epsom and Ewell.

**Figure E: Select sub-regional constraints to providing for unmet housing need**



## Next Steps

Once the period for representations on the Local Plan / SA Report has finished the intention is to submit the plan for examination in public alongside a summary of the main issues raised through the Regulation 19 publication period. Once found to be sound following examination the Local Plan will be adopted, at which time an SA 'Statement' will present prescribed information including "measures decided concerning monitoring".

At the current time the main report suggests a number of monitoring indicators in light of the appraisal above. For example, monitoring efforts might be well targeted at employment land, Gypsy and Traveller accommodation needs and water environment / infrastructure constraints, including with a view to informing future local plan-making.