

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

## Interim SA Report Non-technical Summary

January 2023



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Epsom and Ewell Borough Council

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# Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Epsom and Ewell Local Plan. Once adopted, the Local Plan will set the strategy for growth and change for the borough up to 2040, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.

A central requirement of the SA process is publication of an SA Report for consultation alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives” in order to inform the consultation and plan finalisation. The Council is currently consulting under Regulation 18 of the Local Planning Regulations, and so an ‘Interim’ SA Report is published alongside. This is the non-technical summary, and is structured as follows:

- Part 1 - presents an appraisal of reasonable alternatives; and
- Part 2 - presents an appraisal of the Draft Local Plan (as a whole).

## Part 1: Reasonable alternatives

The aim of Part 1 is three-fold:

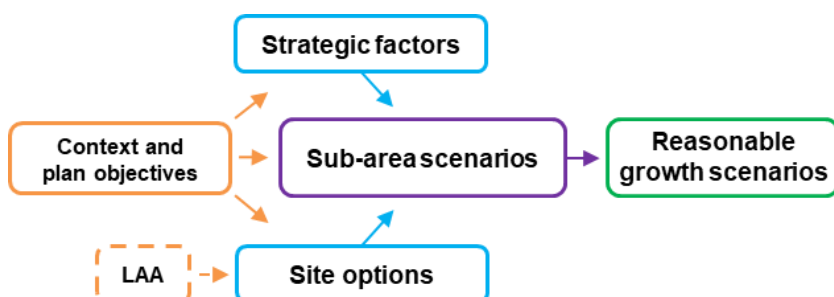
- 1) Explain reasons for selecting reasonable alternatives;
- 2) Present an appraisal of reasonable alternatives;
- 3) Present the Council's response to the appraisal, i.e. reasons for supporting the preferred option.

### Defining reasonable alternatives

Section 4 of the main report explains a focus on reasonable alternatives in the form of ‘**growth scenarios**’, defined as alternative approaches to the allocation of land with a view to providing for objectively assessed development needs, as far as possible, and supporting the achievement of wider plan objectives. Growth scenarios essentially amount to alternative local plan key diagrams.

Section 5 of the main report explains a process that led to the definition of growth scenarios for appraisal. Figure A presents a summary. A key step involved identifying growth scenarios for a series of sub-areas (which might alternatively be thought of as different broad categories of housing land supply), which could then be combined to arrive at reasonable alternative growth scenarios for the borough / local plan as a whole.

Figure A: Defining reasonable alternative growth scenarios



Sub area scenarios are as follows:

- **Town centre** – a town centre masterplan is in preparation, following an initial consultation in 2022. There are four key ‘opportunity areas’, and each is associated with a range of issues and options. However, for the purposes of defining growth scenarios, it is judged reasonable to explore the strategic choice is between: **A**) ~860 homes in total (i.e. across the four opportunity areas); or **B**) 20% more homes via higher densities.
- **Wider urban area** – the process of selecting sites for allocation has been led by the Council through the Land Availability Assessment (LAA, 2022).<sup>1</sup> Again, a key choice is judged to be in respect of density, specifically: **A**) ~830 homes in total; or **B**) 20% more homes via higher densities. N.B. there is also a distinction between two sub-categories, which relate to the level of accessibility / transport connectivity, as discussed in Section 5.4.

<sup>1</sup> Only sites that will deliver a net gain of 25+ homes are formally ‘allocated’, in that they are assigned a policy within the local plan. Smaller sites are simply listed in the local plan, with further information presented in the LAA. All site options within the wider urban area will deliver a net gain of fewer than 25 homes (such that none of the sites are formally ‘allocated’ by the plan).

- **Longmead and Kiln Lane Industrial Estates** – the question of whether to maintain existing industrial uses, or alternatively support a degree of mixed-use redevelopment (to include consolidated and intensified industrial uses), at these two adjacent industrial estates has been explored in some detail over recent years, including: through: the Issues and Options [consultation](#) (2017); a capacity [study](#) completed in 2018; an economic growth [strategy](#) (2020, plus 2021 addendum); a study completed by the Coast to Capital Local Enterprise Partnership (LEP, 2022); and a Housing and Economic Development Needs Assessment (HEDNA, 2022).

In light of all the evidence, the view at the current time is that there is no reasonable growth scenario involving housing supply from the industrial estates (within the plan period). It is recognised that the industrial estates benefit from very good proximity to Epsom town centre (to the south; also Ewell West Station to the north), and that the effect of delivering new housing here would be to reduce pressure on the Green Belt (discussed below), but there is a clear need to avoid impacting on the economic functioning of the industrial estates, and there are practical challenges to effective mixed use redevelopment / intensification. It could be that further work serves to identify some deliverable or developable housing supply (see NPPF [paragraph 68](#)), but no such supply can be identified at the current time, such that any reliance placed on supply from the industrial estates would risk ‘setting the plan up to fail’. Specifically, there would be a risk of housing supply in practice dropping below what the plan commits to delivering (‘the housing requirement’), which would lead to a risk of punitive measures.<sup>2</sup>

- **Previously developed land (PDL) in the Green Belt** – there is only one available site, which is Land at West Park Hospital, to the west of Epsom. West Park was one of the three hospital cluster sites allocated within the Epsom and Ewell Core Strategy (2007), and redevelopment has mostly come forward as planned. The current proposal is to deliver 150 homes on two parts of the site that still comprise NHS buildings, which are underused and judged by the NHS to be surplus to needs. The effect will be to reduce pressure on greenfield land within the Green Belt, plus it is important to note all developed land in this area (i.e. the former hospital site as a whole, also other nearby former hospital sites) may be removed (‘inset’) from the Green Belt prior to plan finalisation (subject to further investigation). There is not considered to be a significant choice in respect of development density (mindful of heritage constraint, namely the Epsom Hospitals Cluster Conservation Area), and so the overall conclusion is that there is only one reasonable growth scenario for ‘PDL in the Green Belt’.
- **Green Belt** – can only be released for development through local plan in exceptional circumstances, and the importance of protecting the Green Belt is emphasised by the Government through the current [consultation](#) on *Levelling-up and Regeneration Bill: reforms to national planning policy*. However, there are reasons to suggest that exceptional circumstances may exist in this case. A primary consideration is Local Housing Need (LHN), which is 576 dwellings per annum (dpa). Also, affordable housing needs are extremely high, with the Housing and Economic Development Needs Assessment (HEDNA, 2022) identifying a need for 652 affordable homes per annum (the true figure may be lower, but any figure for affordable housing need must be considered in the context of extremely low supply, with 12 affordable homes delivered over the two most recent [monitoring](#) years).

When viewed in the context of supply from non-Green Belt sources totalling *at most* 206 dpa,<sup>3</sup> high housing needs serves as a reason to at least explore the possibility of exceptional circumstances. As part of this, it is important to recall that the effects of not meeting housing needs are wide-ranging (e.g. relating to commuting / road traffic, business decision-making, investment, productivity, inequality, health and meeting the needs of specific sectors of the population, including families). Also, housing growth can bring benefits to local communities (‘planning gain’) including by delivering or facilitating delivery of new and upgraded infrastructure.

In this light, the question of Green Belt release is a key issue for the local plan. There is the question of whether to release any Green Belt at all, which is given considerable emphasis within the NPPF.<sup>4</sup> Also, if the decision is taken to release Green Belt (in light of demonstrable exceptional circumstances), then there is a clear need to take steps to minimise harm to the functioning of the Green Belt as far as possible, mindful of the five purposes of the Green Belt set out at [paragraph 138](#) of the NPPF.

<sup>2</sup> i.e. the ‘presumption in favour of sustainable development’ (NPPF paragraph 11), which can also be thought of as a ‘tilted balance’ in favour of housing delivery. This was a factor at a notable recent planning appeal in respect of a 20 home scheme in the Green Belt, which was refused by the Council (ref. [20/00475/FUL](#)), but then allowed by a Planning Inspector at appeal (ref. [APP/P3610/W/21/3280881](#)). The borough’s housing supply position, as measured against the committed target/requirement, is discussed at paragraphs 29 and 33. For example, the Inspector explains: “For the above reasons, and also in the context of the LPAs housing land supply and delivery position, I do not find that the site would be unsustainably located.”

<sup>3</sup> Calculated as: A) town centre and wider urban area allocations (with the higher density scenario assumed); plus B) Green Belt PDL; plus C) commitments (new homes with a planning permission as of 31<sup>st</sup> March 2022); plus D) supply from windfall sites (i.e. sites that can be anticipated to come forward despite not being identified in the LAA). See further discussion below.

<sup>4</sup> Within the draft revised NPPF (December 2022), the primary change in respect of Green Belt policy is addition of the following statement within [Section 13](#): “Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period.”

The LAA does not differentiate between the 23 available Green Belt site options, in terms of their suitability for release for development. However, on the basis of the analysis set out below, it is possible to identify a tentative sequential order of preference (N.B. this is a key step and, as such, views on this order of preference are sought through the current consultation, and further work will be undertaken to inform plan finalisation):

1. Hook Road Arena (~150 homes) – is Council-owned land and is located in close proximity (~800m) to Ewell West Station. Also, the part of the site proposed for housing (with the remainder of the site proposed for a new sports hub) is very well contained within the landscape, with only a small proportion of the site perimeter open to the wider countryside, and this part of the perimeter is well-contained by a mature field boundary.
2. Horton Farm and Chantilly Way (1,525 homes) – two adjacent sites for ~1,500 homes (Horton Farm) and ~25 homes (Chantilly Way). The combined site performs reasonably well in transport terms, including in terms of proximity / links to Epsom town centre (<2km), and there is limited environmental constraint to growth in this area. However, it is the scale of growth that serves as perhaps a primary argument in support of allocation. Urban expansion at this scale can give rise to wide-ranging opportunities over-and-above 'piecemeal' expansion and, in this case, there is the potential (N.B. work is ongoing) to realise opportunities including around housing mix, green infrastructure and meeting Gypsy and Traveller accommodation needs.

N.B. Hook Road Arena is in close proximity, such that there is an argument for considering all three sites in combination (with a view to comprehensive development so as to fully development-related opportunities). However, intervening land includes a conservation area (part of the Hospitals Cluster Conservation Area, which is discussed further below), a cemetery and a horse-riding centre for disabled people (Epsom RDA).

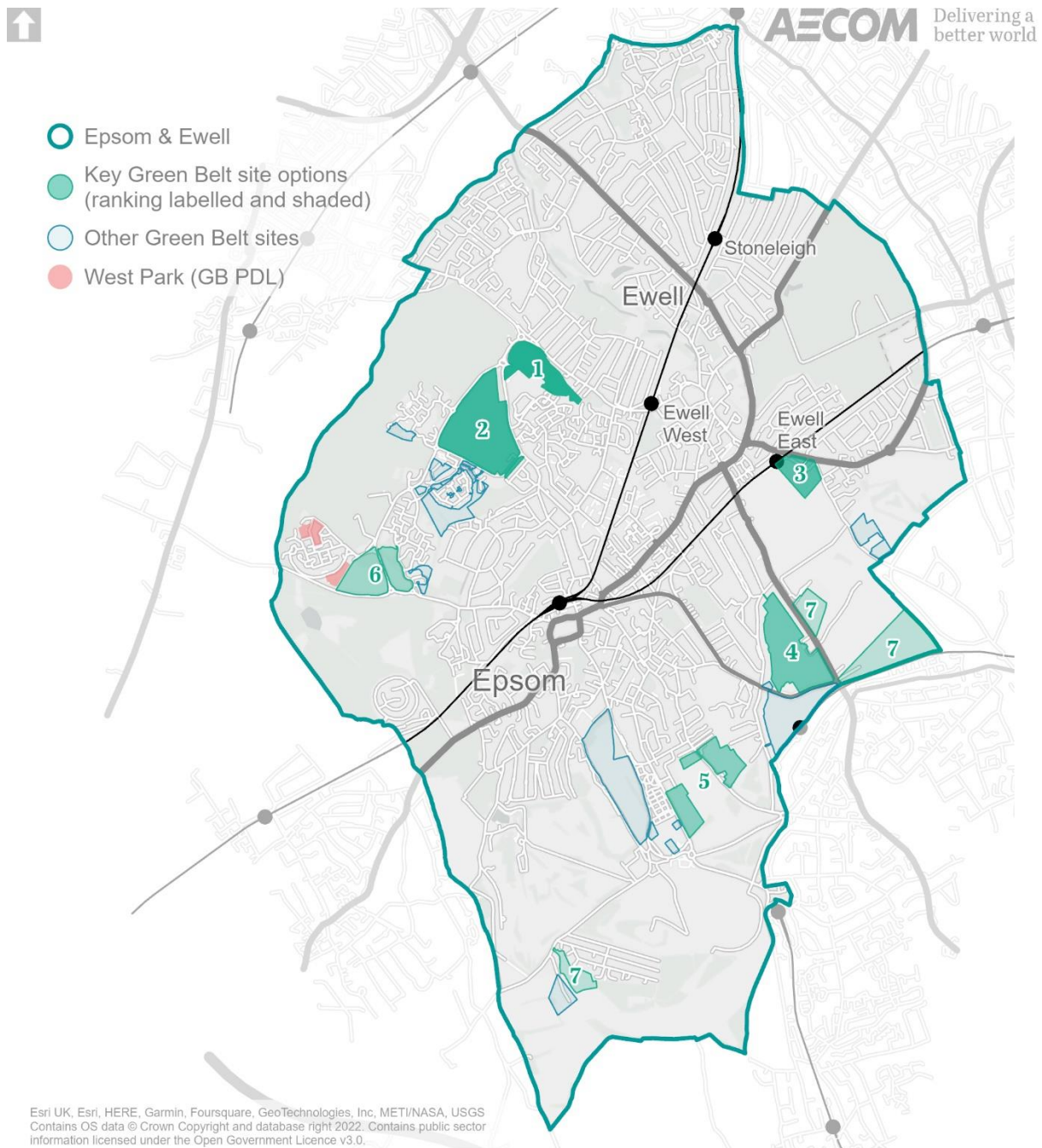
3. Land adjoining Ewell East Station (~350 homes) – there are some notable constraints here, including relating to existing use for sports pitches and sensitivities to the south; however, a key argument in favour of allocation relates to the proximity of Ewell East Station, which is adjacent. Also, there is the potential to deliver new local retail provision, which is understood to be needed in the local area. With regards to the sports pitches, there would be the potential to reprovide these at Hook Road Arena (discussed above).
4. Downs Farm (~650 homes) – performs similarly to the sites discussed above in terms of transport connectivity, with Epsom town centre comfortably under 2km distance, Epsom Downs Station under 1km walking distance (albeit the service is not as frequent as from Epsom (in particular) and Ewell East) and good access to the strategic road network. However, the land is subject to a higher degree of environmental and likely (subject to further work) Green Belt constraint. Different scales and configurations of growth can be envisaged, seeking to balance: A) a need to minimise impacts; with B) a desire to achieve comprehensive growth, with associated benefits, e.g. in terms of new and upgraded infrastructure. On balance, a ~650 home scheme is assumed, which is in line with the latest proposal from the site promotor.
5. SE of Epsom (550 homes) – a cluster of four LAA sites that, it is assumed (for the purposes of defining reasonable growth scenarios), would be delivered in combination, with a view to comprehensive growth. Epsom town centre is <2km distant, and Epsom Downs station ~1.5km walking distance from the eastern-most site, plus there is off-road cycle connectivity a good part of the way towards the town centre; however, the cluster is located between strategic road corridors (potentially with implications for bus connectivity). Landscape is a key constraint, with the land rising quite steeply towards Epsom Downs.
6. South of Manor Park (430 homes) – a cluster of four LAA sites that it is assumed (as above) would be delivered in combination, with a view to comprehensive growth. The cluster benefits from good proximity to Epsom town centre (<1.5km) and, in turn, Epsom Station, and there could be a degree of landscape capacity, given a flat topography and extensive tree cover. However, environmental constraint is overall high (at least in comparison to the sites discussed above). Epsom Common SSSI is adjacent, the Thames Downs Link long distance path passes through this area (linking Epsom Common to Horton Country Park) and there is a high density of mature field boundaries / tree belts (mostly with an area Tree Preservation Order designation). Also, and importantly, the land in question clearly relates closely to two components of the Epsom Hospitals Cluster Conservation Area (specifically West Park and the Manor), as well as the separation between the Hospitals Cluster and Epsom. The land was proposed as an extension to the conservation area by an [appraisal](#) completed in 2007, and this was subsequently implemented, although the extension is not shown on all mapping, and it is noted that the proposed extension related to the setting of a house - Hollywood Lodge - that was extensively fire damaged in 2015, and now appears to be in a state of ruin. Regardless, the land in question clearly has high historic environment value. Finally, it should be noted that the firm intention, under any scenario, would be to retain the allotments currently within the site.
7. Drift Bridge Farm (600 homes), Land NE of Reigate Rd (170 homes) and Langley Bottom Farm (130 homes) are three further sites that are judged to perform relatively poorly, in comparison to those discussed above.

- a. Drift Bridge Farm may have a degree of capacity in landscape terms, given existing built form on two sides, and is subject to limited environmental constraint in some respects. However, the extensive northern boundary is open to the wider countryside (the gap between Epsom and Banstead), and the field boundaries that might be drawn upon to contain development appear relatively weak, such that there would be a concern regarding problematic development 'creep' downhill towards Epsom over time. Banstead Station is nearby 'as the crow flies' but is >2km distant by current walking routes (assuming new access cannot be achieved, which would clearly be challenging and potentially problematic). The existing road access, at the western extent of the site, is also potentially problematic, given proximity of the A240/A2022 junction and a railway bridge. The site relates more closely to Banstead than Epsom.
- b. Land NE of Reigate Rd (A420) comprises a light industrial area, a plant nursery and a composting facility, such that there is considerable existing built form. However, releasing land from the Green Belt would risk greatly compromising the integrity of the landscape / Green Belt gap between Epsom and Banstead, including given limited potential to define a new defensible Green Belt boundary (i.e. the potential for further development creep over time can be envisaged). A development of 15 homes adjacent to the north was delivered in 2015, but this was with the specific intention of enabling the setting up of [Priest Hill Nature Reserve](#) (which does assist with providing some containment within the landscape; also, there is a significant surface water flood channel between the site and North Looe Estate, to the east). Further considerations are: the value of existing uses onsite; the lack of bus services along the A240 (this is also an issue for Drift Bridge farm and Downs Farm); and pedestrian / cycle connectivity and road safety along the A420 (it is noted that an offroad cycle route begins ~700m to the north, which might feasibly be extended).
- c. Langley Bottom Farm is adjacent to the south of Langley Vale, which is a small village developed as a new settlement in the early 20th Century. The village lacks a centre, and overall has limited facilities, but there is a primary school, a good-sized village hall and some limited retail provision at a petrol station (a small shop / news agent recently closed) There is also excellent access to high quality countryside, including [Langley Vale Centenary Wood](#). The site in question comprises a single field to the south of the village, and is the only feasible location for a significant extension to the village, with a view to delivering new community infrastructure and supporting wider place-making. Also, the possibility of a new defensible Green Belt boundary can be envisaged, given woodland to the east and Ebbisham Lane to the south, which marks the northern extent of the Centenary Wood, and where there is a cluster of farm buildings with planning permission for 20 home redevelopment (ref. [20/00475/FUL](#)). However, the site is clearly constrained in landscape terms, as it comprises the northern extent of the Area of Great Landscape Value (AGLV) designation within the borough, which is a Surrey-wide designation that essentially comprises an extension of the Surrey Hill AONB (and it is noted that a [review](#) of the AONB is currently underway, with a view to possible extension to include AGLV land). The land rises steeply from the south (from Ebbisham Lane towards the village) and is prominent within the landscape, including as viewed from two adjacent bridleways (one being Ebbisham Lane) and from Langley Vale Road (at least glimpsed views). The site is also adjacent to Epsom Downs Site of Nature Conservation Importance (SNCI, i.e. the primary local level biodiversity designation). Furthermore, and importantly, aside from environmental constraints, Langley Vale is very poorly connected in transport terms, in comparison to other locations under consideration that are closer to Epsom town centre and/or a rail station. There is only a limited bus service direct from Langley Vale to Epsom.

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

All of the Green Belt site options discussed above are shown in Figure B. Within Figure B the sites are placed in a sequential order of preference (for allocation) in accordance with the discussion set out above.

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



The final step was then to **combine sub-area scenarios** into reasonable growth scenarios for the plan area / local plan as a whole. Five sub-areas are discussed above, and in summary:

- For two sub-areas (Green Belt PDL and the industrial estates) there is only one reasonable scenario.
- For two sub-areas (town centre and wider urban area) there are two reasonable growth scenarios.
- For one sub-area (Green Belt) there are many feasible scenarios, involving various combinations of sites, but the identified sequential order of preference assists with reducing the number of reasonable combinations.

At this point in the process, there is a need to recall the key strategic **context**, namely local housing need (LHN) of 576 dwellings per annum (dpa) and supply from commitments and windfall (defined above) totalling 1,600 homes, or 89 dpa. Also, as discussed, for the purposes of defining reasonable growth scenarios it is fair to assume 150 homes supply from Green Belt PDL (also nil homes from the industrial estates) under all growth scenarios. As such, the total supply that can be assumed as a 'constant' across all reasonable growth scenarios is 97 dpa.<sup>5</sup>

<sup>5</sup>  $(1,600+150)/18 = 97$  dpa

As such, the **residual figure** to be met through allocations within the town centre, wider urban area and the Green Belt is *at least* 479 dpa *if* the housing requirement is to be set at LHN -

N.B. this is an 'at least' figure because there is also a need to ensure that supply exceeds the housing requirement, as a 'buffer' to account for inevitably unforeseen delivery issues at the development management stage.

The **starting point** is a borough-wide growth scenario involving lowest growth across all three of the variable sub-areas, i.e. the lower density assumptions for both the town centre and wider urban area and nil Green Belt. Total supply would be 3,442, or 191 dpa (and housing requirement might be set 5 or 10% lower, to ensure a supply buffer). The effect would be export *at least* 7,000 homes unmet need to a highly constrained sub-region, where unmet housing need is already a major issue, and there is no strategic mechanism in place to address unmet need, such that there can be no confidence regarding where, when or even if unmet needs will be met.<sup>6</sup>

In this light, there is a strong argument to suggest that this scenario is 'unreasonable'. However, on the other hand, there is a need to consider the evolving national policy context in respect of the Green Belt, mindful of the Government's current [consultation](#) on *Levelling-up and Regeneration Bill: reforms to national planning policy*. As discussed, the primary proposed change to the NPPF in respect of Green Belt policy is addition of the following statement within Section 13: *"Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period."*

In this light, and on balance, it is reasonable to appraise (and consult upon) a growth scenario involving lowest growth across all three of the variable sub-areas. This is **reasonable growth scenario 1**.

The next port of call is then a scenario involving the higher density scenario at one or both of the urban sub-areas (town centre and the wider urban area). It is reasonable to just explore a single scenario involving higher density at both sub-areas (to minimise the total number of scenarios), which leads to a total supply of 215 dpa (although, to reiterate, the housing requirement would need to be lower). This is **reasonable growth scenario 2**.

Finally, there is a need to consider growth scenarios involving one or more Green Belt allocations, in addition to higher density across the urban area. It is reasonable to assume that higher urban density is a pre-requisite for greenfield Green Belt allocation, given NPPF paragraph 141: *"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development."*

There is a great number of feasible combinations of Green Belt allocations; however, for the purposes of defining growth scenarios it is reasonable to assume a sequential approach to allocation, i.e. the sequentially preferable site option identified above (Hook Road Arena) would be allocated first, followed by the next sequentially preferable site (Horton Farm / Chantilly Way) and so on. There is a need for caution, in respect of a sequential approach, because site options can often impact in combination – both positively and negatively – however, in this instance it is judged reasonable to assume a sequential approach to Green Belt allocation.

As discussed, the first port of call is Hook Road Arena. However, as this is a modest sized site, it is considered reasonable to assume that it would also be allocated in combination with (nearby) Horton Farm / Chantilly Way. Total supply would be 308 dpa. This is **reasonable growth scenario 3**. In turn, **reasonable growth scenario 4** would involve additional allocation of Land adjoining Ewell East Station (total supply 327 dpa); and **reasonable growth scenario 5** would then involve additional allocation of Downs Farm (total supply 363 dpa).

The next two sequentially preferable sites are then SE of Epsom cluster and South of Manor Park. Two scenarios might be defined involving additional allocation of each of these sites in turn; however, in order to minimise the number of scenarios for appraisal (and consultation) it is considered reasonable to only define a single scenario involving allocation of both sites. Total supply would be 418 dpa. This is **reasonable growth scenario 6**.

Assuming (for the sake of argument) a 10% supply buffer, leading to a housing requirement set at ~375 dpa, this scenario would involve generating around 3,600 homes unmet need, such that there is a clear strategic argument for exploring higher growth scenarios, i.e. scenarios involving further Green Belt release. However, the sites in contention for additional allocation (Drift Bridge Farm, Land NE of Reigate Rd and Langley Bottom Farm) all have very clear issues / drawbacks. There is also a need to consider in-combination impacts, notably in terms of traffic / road and junction capacity (particularly given a potential cluster of three closely related sites to the east of Epsom, also mindful of high car dependency at Langley Vale) and landscape / Green Belt (there would be a clear concern regarding the integrity of the landscape gap between Epsom and Banstead). Finally, there is a need to recall the evolving national policy context in respect of Green Belt, as discussed above.

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<sup>6</sup> N.B. the Council has engaged with all neighbouring authorities directly, under the Duty to Cooperate, regarding the possibility of providing for unmet housing need from Epsom and Ewell, but all have replied saying that they are not able to do so.



In this light, and on balance, it is considered reasonable *not* to define a further higher growth scenario, i.e. a scenario involving a level of growth over-and-above reasonable growth scenario 6. It is important to recall that a central tenet of the local plan-making under the NPPF is the potential to set a housing requirement that balances housing need and wider issues and opportunities (with any unmet need generated then dealt with as necessary).

Therefore, there are **six reasonable growth scenarios**, which are shown across the table and maps below. Finally, as a methodological caveat, it is important to note that there is invariably a need to make simplifying assumptions in order to arrive at a manageable number of scenarios, given the aim of arriving at scenarios that reflect the objectives of the plan (such that they essentially comprise alternative key diagrams).<sup>7</sup> A key motto is that *“the phrase all reasonable alternatives does not equate to all conceivable alternatives”*<sup>8</sup> and there is clear precedent on the need for proportionality, in respect of the task of arriving at reasonable alternatives.

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

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

\* It is important to recall that the housing requirement would need to be set a lower figure, to ensure a supply buffer.

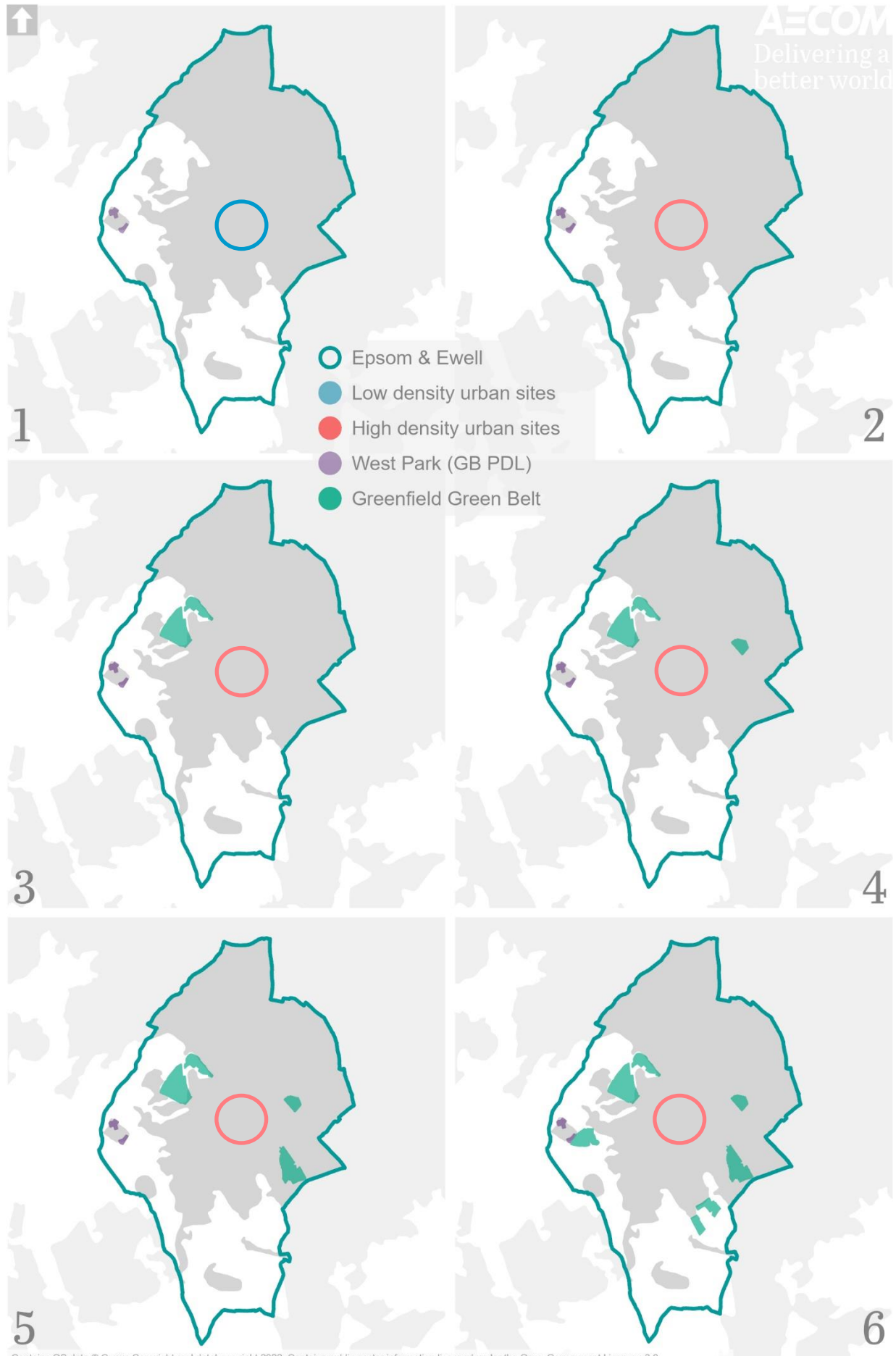
In summary, the reasonable growth scenarios are:

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

<sup>7</sup> The legislative requirement (Environmental Assessment of Plans and Programmes Regulations, 2004) is to appraise and consult upon reasonable alternatives *“taking account of the objectives and geographical scope of the plan...”*

<sup>8</sup> See <https://www.aylesburyvaldc.gov.uk/sites/default/files/VALP/VALP%20Report.pdf#page=43>

Figure C: The reasonable alternative growth scenarios



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## Appraising reasonable alternatives

Having defined reasonable alternatives in the form of six growth scenarios, the next step is to appraise them under the 'SA framework', which essentially comprises a list of 13 sustainability topics. Further information on the appraisal 'scope' is set out within a stand-alone [Scoping Report](#) (2022)

The appraisal is presented below in the form of an appraisal 'matrix', comprising a column for each of the reasonable growth scenarios, and a heading for each of the 13 components of the SA framework. The appraisal matrix is followed by a supporting commentary.

Within each row of the appraisal matrix, the aim is to:

- 1) rank the scenarios in order of performance (with a star indicating best performing; "=" indicating scenarios performing broadly on a par; and "?" indicating an inability to reach a conclusion); and then
- 2) categorise the performance in terms of 'significant effects' using red / amber / light green / green.<sup>9</sup>

*Table B: Reasonable alternatives - summary appraisal findings*

Topic	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Accessibility	4	3	2	★1	2	2
Air quality	5	4	3	★1	★1	2
Biodiversity	3	2	★1	★1	★1	3
Climate change adaptation	=	=	=	=	=	=
Climate change mitigation	4	3	2	★1	3	3
Communities	=	=	=	=	=	=
Economy and employment	6	5	4	3	2	★1
Historic environment	3	3	★1	★1	2	4
Housing	6	5	4	3	2	★1
Land and soils	2	★1	★1	★1	★1	★1
Landscape	2	★1	★1	★1	3	4
Transport	4	3	2	★1	2	3
Water	?	?	?	?	?	?

<sup>9</sup> Red indicates a significant negative effect; amber a negative effect of limited or uncertain significance; light green a positive effect of limited or uncertain significance; and green a significant positive effect. No colour indicates a neutral effect.

## Discussion

There are three immediate points to note.

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

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

- **Accessibility** – to community infrastructure is a key issue for local plan-making. There is a need to deliver new and upgraded capacity, to the benefit of the new and existing communities. **Horton Farm** is supported, in this respect, on account of its scale, although more work is needed to confirm precisely what will be delivered. Engagement with the County Council to date has not confirmed the need for a primary school (declining birth rates over the >10 years is a factor), but schemes of this scale are typically able to provide land for a primary school if required. Furthermore, the site links well to existing local centres, with a high density to the west of Epsom (see [Figure 12.1](#) in the Scoping Report, SR), which is also a factor in support of **Hook Road Arena** (the B2200/B284 can be described as a strategic corridor). Also, and more generally, strategic growth to the west of Epsom will complement recent growth associated with the former hospitals cluster, with place-making opportunities that can be explored further prior to plan finalisation. With regards to Land adj. Ewell East Station (**Scenario 4**), this will deliver new retail provision to meet a local need. With regards to Downs Farm (**Scenario 5**), the current proposal is to provide land for a primary school, which is supported given the scale of proposed growth; however, there is no evidence to suggest that a new primary school is needed in the borough, even under a higher growth scenario akin to Scenario 5. Under **Scenario 6**, there is little reason to suggest any particular additional community infrastructure-related opportunity, and it could feasibly be the case that growth comes forward in somewhat piecemeal way (e.g. if the SE cluster proves not to be deliverable as a single, comprehensive scheme, given divided land ownership) that serves to increase pressure on existing community infrastructure capacity locally. With regards to the final two scenarios, **Scenario 2** is preferable to Scenario 1 as higher density development in the urban area will lead to opportunities to deliver new community infrastructure over-and-above lower density development, plus exporting unmet need is generally not supported given the possibility of unmet need ultimately being met in locations / in a way that is problematic, or sub-optimal, in terms of accessibility to community infrastructure.
- **Air quality** – is not a major issue locally, with just one designated air quality management area (AQMA), which is within Ewell (such that it is relatively distant from most of the Green Belt site options that are the primary variable across the growth scenarios). However, [Figure 2.2](#) of the SR does show another dataset, which shows that air quality is higher in rural West Surrey than in suburban East Surrey. The appraisal conclusions reflect two factors. Firstly, generating **unmet need** is problematic in transport terms and so, in turn, also for air quality. Also, some towns in the sub-region that might feasibly be a focus for unmet need are notably constrained in air quality terms. Secondly, the additional sites allocated under **Scenario 6** are less well-connected in transport terms, and so, in turn, are potentially problematic for air quality. Noise pollution is another consideration here, but it is not clear that any of the potential growth locations are significantly constrained in this respect (higher densities can give rise to challenges). Finally, it is noted that there is a primary school adjacent to Horton Farm, which is a 'sensitive receptor' that will require further consideration.

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

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

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

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

- **Economy and employment** – the proposal at Downs Farm is to deliver a small amount of new employment floorspace, and there would be the potential to explore the possibility of delivering similar at Horton Farm (subject to further masterplanning work, e.g. considering the possibility of delivering a mixed use community hub, which is something that might typically be expected for a scheme of this scale). However, the overriding consideration here is that none of the Green Belt sites in question would deliver significant new employment land. In turn, the primary consideration here is the need to deliver new homes in order to support the local economy, recognising the needs of businesses in terms of access to a suitably skilled local workforce. House prices and lack of specific housing types and tenures, including family and affordable housing, can be a major issue for the effective functioning of local economies. Also, there is a need to consider the importance of suitable housing in terms of supporting productive home working and individual productivity more generally. Finally, with regards to the urban area, it is likely to be the case that support for higher density schemes with a focus on delivering additional new homes also enables delivery of additional new employment floorspace (likely in the form offices or flexible employment space), but this is somewhat uncertain at this stage.
- **Historic environment** – is a key consideration enabling differentiation between the growth scenarios. Beginning with **Scenarios 1 and 2**, higher density development in the urban area (Scenario 2), and potentially the town centre in particular, gives rise to significant tensions with historic environment objectives, in the Epsom and Ewell context. However, on the other hand, exporting unmet need (highest under Scenario 1) is potentially problematic, given the lack of any certainty regarding where unmet need will ultimately be met, and given widespread historic environment constraint across Surrey and the wider sub-region.

With regards to the remaining scenarios, the first point to note is that **Scenario 6** performs very poorly, because of the degree of constraint affecting Land south of West Park. There is uncertainty as to whether the land falls within a conservation area (discussed above); however, regardless, the land relates very closely to two western-most two components of the Hospitals Cluster Conservation Area (see Figure B above; also [Figure 8.1](#) in the SR). Also, under Scenario 6, the assumed SE Epsom cluster is subject to a degree of constraint, given adjacent Epsom Cemetery and also the former rifle butts that comprises a central component of this cluster, and which is associated with a bridleway and mature field boundaries. All these features appear on the pre-1914 OS map, as does nearby Epsom Racecourse (which dates from the C17<sup>th</sup>).

With regards to **Horton Farm**, the site relates closely to *three* components of the Hospitals Cluster Conservation Area, and there is a listed farmhouse onsite. However, it is less clear that the land parcel (area of farmland) contributes significantly to appreciation of the conservation area (as a whole), and there could well be the potential for sympathetic development to complete the ‘story’ of reimagining the historic hospitals cluster. Much depends on the scale of growth (possibly <1,500 homes) and the detailed approach that is taken to masterplanning and design, and there would be a clear need to work closely with Historic England.

Finally, **Downs Farm** is adjacent to a conservation area associated with an early C20<sup>th</sup> housing estate, and land within the site does rise away from the conservation area; however, the proposed greenspace could mitigate any visual impacts. Again, there is a need to gather further evidence through consultation.

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

- **Housing** – whilst there is (and has always been) flexibility to set a **housing requirement** below LHN, from a 'housing' perspective there is a clear need to set the housing requirement at LHN if at all possible and, if this is not possible, set the housing requirement at a figure as close as possible to LHN. This is the key factor that enables differentiation between the alternative growth scenarios. There are two other key considerations here. Firstly, there is a need to recognise that greenfield (Green belt) sites are typically well suited to delivering a **good housing mix**, including a mix of types (including family housing), tenures (i.e. a good mix of affordable housing tenures, mindful of extremely high needs, as discussed above) and specialist housing, including for older people (although urban sites can also be well suited to some types of older persons housing, given good accessibility to the town centre or a local centre). Brownfield sites can tend to face viability challenges (at least relative to greenfield sites) that lead to challenges in respect of delivering a good housing mix. Secondly, the scale of Horton Farm (also its configuration, with a plethora of access options) means that it is very well suited to providing for **Gypsy and Traveller accommodation needs**. The Council has recently completed an accommodation assessment, which finds that there is a need for 12 pitches for those who meet the 'planning definition' set out within the Government's Planning Policy for Traveller Sites (PPTS, 2015), which essentially relates to ongoing active travelling, or otherwise a full 'cultural' need for 18 pitches. Recent legal precedent lends weight to providing for the full 'cultural' need (in order to avoid discrimination against those who cannot travel), which is at a level (18 pitches) that could prove challenging to meet in the local context. Delivering new pitches as part of strategic urban extensions is not necessarily an ideal solution, but is a key option to explore in the Epsom and Ewell context (and, as discussed, Horton Farm is well suited). There are important masterplanning considerations that will warrant further work, e.g. there would likely be a strong argument for several smaller sites (e.g. comprising ~3 or 4 pitches) rather than one large site.
- **Land, soils and resources** – Horton Farm and Downs Farm are in productive agricultural use, whilst the other Green Belt site options in question appear to be in use for keeping horses (potentially an important consideration for the local economy, given Epsom Racecourse) or, in the case of Land adjoining Ewell East Station, sports pitches. None of the site options in question have been surveyed in detail to ascertain the grade of **agricultural land** (see the 'post 1988 criteria' dataset available at [magic.gov.uk](http://magic.gov.uk)), but the nationally available low resolution/accuracy 'provisional' agricultural land quality dataset shows all agricultural land in the borough to be either 'grade 3' quality (which may or may not be 'best and most versatile, which the NPPF classes as land that is of grade 1, 2 or 3a quality) or 'grade 4' quality. Specifically, there is a prevalence of grade 4 quality land in the south of the borough, which could potentially mean that Horton Farm comprises higher quality agricultural land than is the case for Downs Farm; however, there is no certainty in this respect. There are two further considerations. Firstly, with regards to **unmet need**, it is fair to predict that scenarios involving high levels of unmet need would lead to pressure on productive, and potentially higher grade, agricultural land over-and-above scenarios involving meeting more of Epsom and Ewells housing need locally. However, this is a fairly marginal consideration, as the national 'provisional' dataset does not show a high prevalence of higher quality (grade 2) quality land across the wider sub-region. There is a concentration of higher quality agricultural land to the west of Epsom (e.g. Spelthorne and Runnymede), but there is little or no potential for unmet need for Epsom and Ewell to be provided for here. Secondly, whilst there do not appear to be any minerals [safeguarding areas](#) intersecting the borough, there is a **'waste consultation area'** associated with a waste transfer site adjacent to Downs Farm (former Epsom Chalk Pit / Lime Works). This is a constraint to development but has been accounted for in masterplanning proposals received to date.
- **Landscape** – is clearly a key consideration. Beginning with **Scenarios 1 and 2**, the new emphasis on protecting local character in the draft NPPF (December 2022) is noted; however, a key consideration here is a need to support higher densities in order to reduce pressure on sensitive greenfield locations (whether within Epsom and Ewell or the wider sub-region). With regards to **Scenarios 3 and 4**, it is not possible to conclude that these scenarios perform worse than Scenario 2 (urban area only) once account is taken of the extensive landscape constraints affecting the wider sub-region, including the Surrey Hills AONB and the High Weald AONB (constraining Horsham and land south of Crawley) and the Area of Great Landscape Value that essentially extends the Surrey Hills AONB. Unmet need from Epsom and Ewell would not be provided for in one of these designated landscapes (certainly not an AONB), but the presence of these designated landscapes serves to indicate the scale of the challenge. Both Horton Farm and Land adjoining Ewell East Station have their landscape challenges, but these are considered to be fairly limited.

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

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

With regards to **Land adjoining Ewell East Station**, the site is considered well-contained in Green Belt terms, but there is an adjacent historic bridleway. It will likely be possible to mitigate visual impacts from here.

Finally, with regards to **Scenarios 5 and 6**, the sites in question are judged to be constrained in landscape terms, such that the scenarios perform poorly, even though there would be reduced unmet need. Beginning with Downs Farm, the land here begins to rise towards Epsom Downs, and there is a concern in respect of securing a defensible new Green Belt boundary. Specifically, the concern would be that development leads to subsequent pressure to release the parcel of land to the south of A2022 which, in turn, would lead to a risk of coalescence between Epsom and Banstead. It is recognised that concerns are reduced on account of the proposed greenspace within the Downs Farm site (on the high point of the site), and also given the presence of the aforementioned waste transfer facility, but a degree of concern remains nonetheless, including noting that land to the south of the A2022 is in the same land ownership as the current Downs Farm site option. Land to the south of the A2022 could feasibly be offered as greenspace (albeit at the expense of productive agricultural land). Moving on to Land south of Manor Park, the extent of woodland TPOs may indicate a good degree of visual containment; however, a concern is intersecting and adjacent public rights of way, including the Thames Downs Link long distance path (bridleway), which links Epsom Common to Horton Country Park. Finally, with regards to the SE of Epsom cluster, there is a clear landscape concern given quite steeply rising land, the nearby Epsom Downs viewpoint (although there is intervening woodland, which may provide screening); also a historic bridleway passing through the cluster, linking Epsom to Epsom Downs.

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



## Selecting the preferred option

The following statement explains EEBC officers' reasons for supporting **Scenario 4**:

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

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

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

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

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

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

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

## Part 2: Draft plan appraisal

Part 2 of the report presents an appraisal of the current draft plan. The appraisal comprises a series of 13 narrative discussions – one for each component of the SA framework – where the aim of each discussion is to reach a conclusion on the ‘significant effects’ of the plan (as a whole). In practice, the appraisal is an opportunity to elaborate on the appraisal of Scenario 4 (as presented above) with added consideration given to proposed policies.

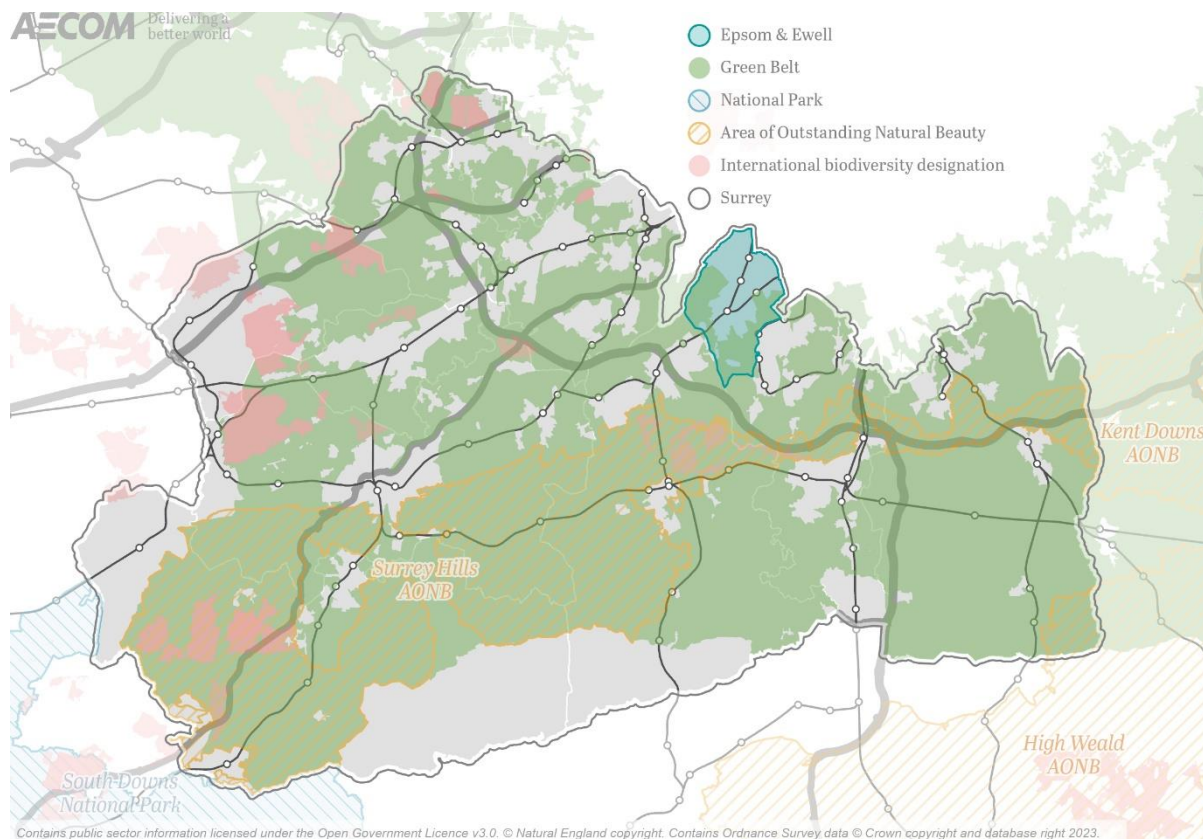
The appraisal conclusion is as follows:

- **Significant positive effects** – the appraisal does not predict any significant positive effects; however, it is anticipated that it will be possible to predict significant positive effects prior to plan finalisation, in light of further work (including in response to new evidence gathered through the current consultation). One issue is that the ‘baseline’ (no plan) scenario is likely one whereby there continues to be low growth in the borough, because of the protection given to Green Belt under the NPPF. This is in contrast to non-Green Belt authorities, where there is often an urgent need to adopt a local plan to avoid a situation whereby there is problematic unplanned growth under the presumption in favour of sustainable development / tilted balance (‘planning by appeal’).
- **Moderate or uncertain (MoU) positive effects** – the appraisal of reasonable growth scenario 4 (in Part 1) leads to a prediction of MoU positive effects only in terms of **Accessibility** (because growth will deliver new community infrastructure and support the vitality of existing centres). However, having taken account of DM policy it is possible to also predict MoU positive effects in terms of: **Communities** (because numerous policies are focused on addressing the needs of new and existing communities); **Economy and employment** (because of the policy targeted at protecting existing employment land, which is a key issue locally); and **Transport** (this is another issue that is a focus of wide-ranging policy, and detailed evidence has been prepared to inform the plan, albeit there is also a need for further work, given the critical importance of supporting modal shift away from the private car, and delivering targeted upgrades to transport infrastructure).
- **Neutral effects** – are predicted for **several topics**. In each case there are a range of issues and impacts, but it is difficult to reach a conclusion on whether overall effects will be positive or negative, relative to the baseline (no plan) scenario, and will be of any significance. For example, in respect of Biodiversity, certain allocations do give rise to a degree of risk, but there is a need to recall that the baseline scenario involves a situation whereby there is increased pressure to accommodate unmet housing need within a constrained sub-region.

With regards to Climate change mitigation, whilst there can be little doubt that the plan will lead to an improvement on the baseline (with respect to per capita greenhouse gas emissions), the question is whether the extent of the improvement is *enough*, given the scale of the net zero challenge, with the NPPF discussing the need to “*shape places in ways that contribute to radical reductions in... emissions.*” It is noted that the proposal is to require that greenfield schemes exceed the emissions requirements of Building Regulations (which are currently being tightened to a ‘Future Homes Standard’), which is strongly supported.

- **Moderate or uncertain (MoU) negative effects** – are not predicted under any topic headings. However, in two cases this decision was quite marginal. Firstly, there are clearly arguments to suggest that Landscape impacts will be negative and of some significance, even accounting for the issues that can be envisaged under a baseline (no plan) scenario at the sub-regional scale. It is important to recall that Green Belt is not a landscape designation; however, on the other hand, in the Epsom and Ewell context, parcels of land with high Green Belt value will also often tend to have high landscape value, including given the importance of settlement separation from a perspective of seeking to ensure a strong sense of place. Secondly, with regards to the Historic Environment, a key factor is the proposed allocation of a PDL Green Belt site within a conservation area.
- **Significant negative effects** – must be predicted under the **Housing** topic heading, as there are reasonable alternative approaches that might be taken that would involve setting the local plan housing requirement at a figure closer to local housing need (LHN) such that the local plan exports less unmet need to a constrained sub-region where unmet need is already a major problem. However, it is recognised that this decision has been taken on balance, weighing-up competing objectives, as discussed above. Also, it is recognised that wide-ranging policy is proposed aimed at supporting the achievement of housing-related objectives; and the proposal to go some way towards meeting the accommodation needs of Gypsies and Travellers in full. In respect of housing-related thematic policy, a key point to note is the proposal to prioritise delivery of affordable housing, with the proposal to require 40% affordable housing on the four greenfield allocations. Given the scale of affordable housing needs there could be a need to consider the possibility of setting a still higher requirement, albeit this would need to be within the constraints of development viability, and in recognition of the inevitable need to trade-off against other important policy objectives, e.g. climate change mitigation / net zero.

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



The figure above shows a selection of key sub-regional issues and constraints that create a challenge in respect of meeting unmet need from Epsom and Ewell. N.B. by way of orientation, it is important to note that land beyond the Green Belt within west Surrey is almost entirely urbanised, associated with the A331 corridor / Blackwater Valley, between Camberley and Farnham.

Wider environmental challenges include national and local biodiversity designations (e.g. landscapes associated with very high densities of ancient woodland in south Surrey); local landscape designations (including the Area of Great Landscape Value, AGLV, within Surrey, which is an extension of the AONB and currently being reviewed by Natural England with a view to potentially extending the AONB); and the 'water neutrality' constraint that is a major barrier to growth at Crawley, Horsham and other locations in the Sussex North Water Resource Zone.

Another factor that could be explored through further mapping / spatial analysis is functional connectivity between Epsom and Ewell and locations that could conceivably provide for unmet need. There is limited firm evidence regarding the extent of housing and economic market areas; however, there are some obvious points for consideration around transport connectivity, which is a key factor influencing housing and economic market areas.

In this respect, a key point to note is that Epsom and Ewell links directly to wider Surrey via the A24, which is not shown on the map above, because it is not part of the Strategic Road Network managed by National Highways. It is also a rail corridor, and the trainline is shown on the map, linking Epsom to Leatherhead, Dorking and Horsham. There is little or no reason to consider this a growth corridor. Otherwise, the borough is near equidistant between two more strategic road and rail corridors, namely the A3 corridor to Guildford and beyond (East Hampshire); and the A23 corridor to Gatwick, Crawley and Brighton.

Finally, there is a need to consider locations other than Epsom and Ewell where unmet housing need is an existing or likely / potential future issue, and locations where plan-making work to date serves to evidence a conclusion that there is little or no realistic potential to provide for unmet needs. It is beyond the scope of this brief note to present a detailed review, but the issues are significant. For example, the emerging local plans for neighbouring Mole Valley and Elmbridge are both likely to generate significant unmet need. In summary, Surrey is an obvious key scale at which to deal with unmet need, but there are no clear mechanisms in place, and inherent challenges.