

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

SA Report Addendum

September 2026

Quality information

Prepared by

Checked by

Approved by

Mark Fessey
Associate Director

Prepared for:

Epsom and Ewell Borough Council

Prepared by:

AECOM Limited
Aldgate Tower
2 Leman Street
London E1 8FA
United Kingdom
aecom.com

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Non-technical summary

This report presents an appraisal of the proposed main modifications (MMs) to the submission version of the Epsom and Ewell Local Plan (as submitted in November 2024) that are currently published for consultation.

The focus of the report is on: A) introducing the proposed MMs (Section 2); and then B) presenting an appraisal (Section 4). Also, consideration is given to the possibility of defining / appraising reasonable alternatives (Section 3), but the conclusion reached is that there are no reasonable alternatives at the current time.

It is important to be clear that this is an “addendum” report and does not aim to supersede the SA Report (2024). However, consideration is given to whether conclusions presented within the SA Report now require adjustment in light of the appraisal set out in this addendum.

The appraisal presented in Section 4 concludes as follows:

The appraisal finds that none of the proposed modifications generate significant effects, either alone or in combination. However, the proposed modifications do have positive implications for the achievement of sustainability objectives relating to meeting housing needs. The most significant aspect of the proposed modifications is the proposal to allocate four new Green Belt sites for a total of 937 homes and, in particular, a focus of the appraisal is the proposal to allocate Downs Farm, to the east of Epsom, for 530 homes. There are inevitably challenges associated with this site given its scale, current use (recent use for agriculture) and location, but as well as making a significant contribution to housing needs it can deliver benefits including affordable housing, land for a school, transport upgrades and large scale open space / sports pitches.

1 Introduction

- 1.1.1 AECOM is commissioned to undertake a Sustainability Appraisal (SA) in support of the emerging Epsom and Ewell Local Plan that is being prepared by Epsom and Ewell Borough Council (EEBC). Once adopted, the 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.
- 1.1.2 The formally required SA Report was published alongside the final draft ('proposed submission') version of the Local Plan in December 2024 under Regulation 19 of the Local Planning Regulations and then submitted to the Government for examination in public alongside the Local Plan in March 2025. The aim of the SA Report, in accordance with Regulations, was essentially to present an appraisal of "the plan and reasonable alternatives" and "an outline of the reasons for selecting the alternatives".
- 1.1.3 The appointed Planning Inspector then oversaw examination hearings in August and September 2025, before a post hearings letter was published on 22nd October 2025. Further work was then undertaken before a further post hearings letter was received from the Inspector on 12th February 2026, essentially confirming a need for the Council to identify additional site allocations. Specifically, it was established that additional allocations were needed 'boost' housing land supply and, in turn, the housing requirement, which is the number of homes that the Local Plan commits the Council to delivering over the plan period.
- 1.1.4 Between May and June 2026 the Council then undertook a consultation on documents relating to additional sites that could potentially be allocated through 'main modifications' to the Local Plan (as submitted in 2024). Specifically, the documents were as follows: Assessment of Urban Sites; Green Belt Topic Paper (additional work); Additional Sites for Potential Allocation; Sustainability Appraisal (SA) Report Addendum; Habitats Regulations Assessment (HRA) Addendum; Infrastructure Delivery Plan (IDP) Addendum; Transport Assessment Addendum; Transport Assessment Technical Annex.
- 1.1.5 With regards to the SA Report Addendum published in May 2026, this essentially defined and appraised a series of alternative approaches to boosting supply via additional site allocations ('growth scenarios').
- 1.1.6 A hearing session on additional site allocations was then held on 2nd July 2026, and the Inspector has now recommended a series of main modifications to the Local Plan to make the plan sound.
- 1.1.7 The aim of this SA Report Addendum is essentially to present an appraisal of the proposed main modifications (MMs) and reasonable alternatives (just as the fundamental requirement of the SA Report was to present an appraisal of the draft plan and reasonable alternatives, as discussed above).
- 1.1.8 In turn, the aim is to inform the current consultation which – it is important to be clear – is focused only on MMs. This report does not aim to re-present information from the SA Report (2024) that is of little or no relevance to the current consultation on MMs and, in turn, does not aim to supersede the SA Report.
- 1.1.9 This report is structured as follows:
 - **Section 2** – presents a summary of the proposed main modifications.
 - **Section 3** – considers the question of reasonable alternatives.
 - **Section 4** – presents an appraisal of the proposed main modifications.

2 The proposed main modifications

2.1 Introduction

- 2.1.1 There are a total of 183 proposed MMs, but it is important for SA to only focus on those with the potential to generate "**significant effects**", either alone or in combination (also in combination with wider aspects of the submitted plan).

2.1.2 Within the SA Report (2024) this understanding that SA must focus only on significant effects translated into a strong focus on the 'spatial strategy', i.e. the suite of proposed site allocations / the identified land supply to deliver on development needs alongside wider plan objectives over the plan period.

2.1.3 In turn, it is clearly the case that appraisal work at the current time must focus on proposed changes to the spatial strategy, which are significant. These are introduced below. However, there are also a range of wider proposed modifications that are potentially significant, which are also introduced below.

2.2 Changes to the spatial strategy

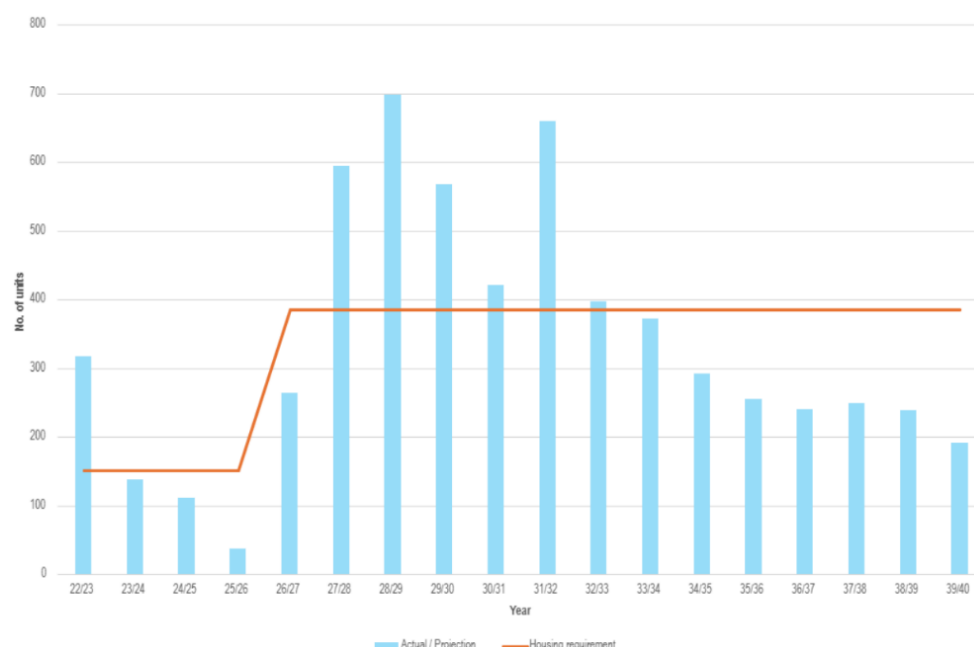
2.2.1 The proposal is now that the housing requirement over the plan period (2022/23 to 2039/40) should be set at 6,012 homes, or 334 dwellings per annum (dpa) on average. This compares to a requirement of 4,700 homes in the Submission Local Plan (261 dpa). For context, the housing requirement is the number of homes that the Council commits to delivering,¹ and the current proposal for a housing requirement averaging 334 dpa contrasts to a local housing need (LHN) figure of 569 dpa (as understood from the Government's standard method), such that the proposal is to set the housing requirement at 59% of LHN.²

2.2.2 More specifically, the new proposal is for a 'stepped' housing requirement as follows:

- Years 1 to 4 (2022/23-2025/26) – 152 homes per annum
- Years 5 to 18 (2026/27-2039/40) – 386 homes per annum

2.2.3 The figure below shows the proposed stepped requirement alongside the proposed housing supply, with the two key points to note as follows: 1) total supply over the plan period 6,052 homes, i.e. such that supply meets (and marginally exceeds) the housing requirement; and 2) the supply is significantly above the housing requirement over the early years of the plan period post adoption, which leads to confidence that the Council will be able to deliver on the housing requirement in practice given the risk of unforeseen delivery issues. More specifically, the supply 'headroom' over the early years of the plan period provides confidence that the Council will be able to maintain a five year housing land supply.

Figure 2.1: The proposed housing land supply and stepped housing requirement

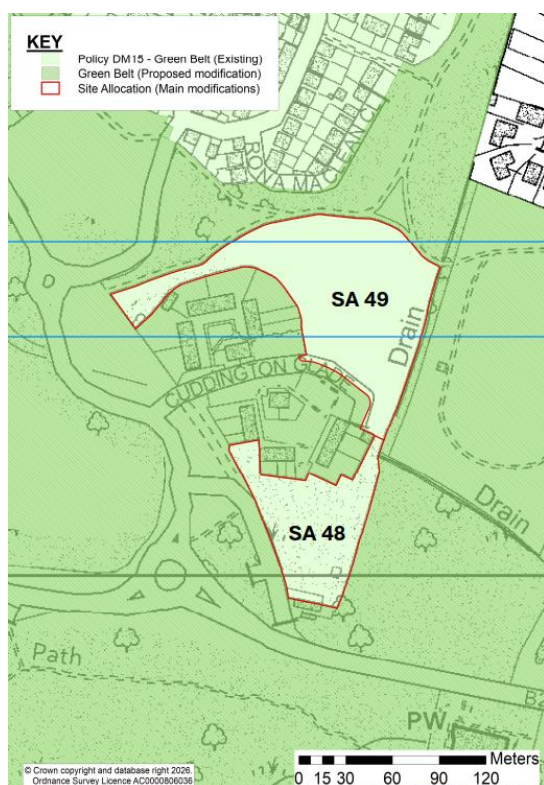


¹ Delivery against the requirement is evaluated in two ways, namely reporting of performance in terms of: 1) the Housing Delivery Test; and 2) demonstration of a five year housing land supply.

² LHN is taken from the 2023 standard method because the plan is being examined under 'transitional arrangements' (see paragraph 234(b) of the NPPF published in December 2024). Were the plan not being examined under transitional arrangements then there would be a need to account for the 2024 standard method which is significantly higher.

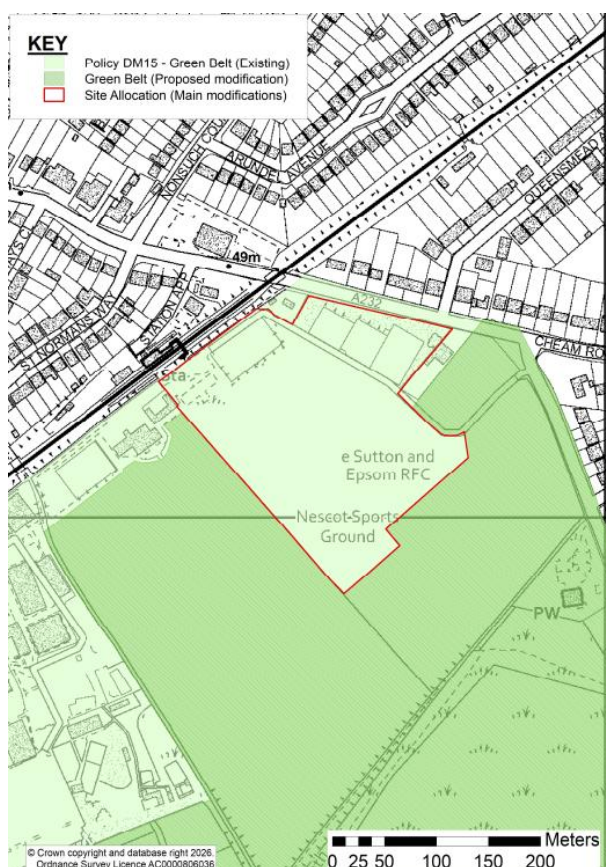
- 2.2.4 The new higher housing requirement is a reflection of the proposal to allocate a series of new housing sites, namely: A) 12 new urban allocations added (SA36-47), which will collectively deliver 188 homes; and B) 4 new Green Belt allocations (SA48-SA51), which will collectively deliver 937 homes. Focusing on Green Belt allocations, this means that in total the proposal now is to allocate nine Green Belt sites for a total of 2,497 homes, in comparison to five sites for 1,502 homes at submission.
- 2.2.5 The 16 new proposed allocations align with those proposed within the 'Additional Sites for Potential Allocation' document (ref. [COUD 29](#)) that was consulted upon in May-June 2026 with one exception. Specifically, Site COL017 (Land West of Burgh Heath Road) was identified as a potential allocation for 50 homes in May-June 2026, but it is *not* a proposed allocation at the current main modifications stage. The site that performs relatively poorly in accessibility terms, and is associated with a relatively sensitive part of the urban edge in landscape terms given rising land and the proximity of Epsom Downs.
- 2.2.6 Focusing on the four new proposed Green Belt allocations, these are:³
- SA48 (Cuddington Glade; 37 homes) & SA49 (Land off Cuddington Glade; 50 homes) – two adjacent sites to the west of the main urban area, north of the B280 Christ Church Road (see Figure 2.1).
 - SA50 (Land at Priest Hill; 275 homes) – located to the east of the main urban area, and specifically located adjacent to the east of Ewell East station (see Figure 2.2).
 - SA51 (Downs Farm; 530 homes) – located to the south east of the main urban area, and specifically to the north of the A2022 College Road and to the west of the A240 Reigate Road. The allocation additionally includes an area of land to the south of College Road proposed for open space.
- 2.2.7 A site specific policy has been prepared for all 16 of the new proposed allocations, plus there are a range of adjustments proposed to site-specific policies that relate to allocations in the Submission Local Plan.
- 2.2.8 The above discussion covers the primary proposed changes made in respect of spatial strategy. Final points to note are then: 1) modest adjustments to the capacity for several sites;⁴ 2) deletion of two allocations that are now under construction; and 3) new text to confirm the employment land need figure to be provided for and how this will be delivered (no substantive changes to the strategy).

Figure 2.1: Proposed allocations SA48 and SA49



³ Previously the reference numbers for these sites reflected the Land Availability Assessment (LAA) as follows: HOR001 (Cuddington Glade); HOR004 (Land off Cuddington Glade); NON013 (Land at Priest Hill); NON016 (Downs Farm).

⁴ Most significantly, the proposal is to increase the capacity at SA32 (Land at West Park Hospital (North)) from 150 to 180 homes. The other six proposed changes to site capacities are very minor, involving a capacity increase of at most 5 homes.

Figure 2.2: Proposed allocation SA50**Figure 2.3: Proposed allocation SA51**

2.3 Other proposed modifications

2.3.1 Other proposed changes are of relatively limited significance, but the following bullet points aim to provide an overview. Policy references reflect the latest situation (noting some renumbering and/or renaming) and policies / proposed changes are discussed in a broad descending order of significance:

- Policy S6 (Affordable Housing) – the proposal is now to specify that Green Belt sites should deliver 50% affordable housing in line with national policy. The Submission Local Plan had simply stated that all greenfield sites should deliver 40% (which remains the requirement for non-Green Belt greenfield sites).
- Policy S8 (Gypsies, Travellers and Travelling Showpeople) – the proposal is to remove the requirement to deliver a minimum of 3 pitches/plots on windfall (i.e. unallocated) sites involving 200+ homes.
- Policy DM8 (Epsom Downs Racecourse and the Racehorse Training Industry) – there are a range of proposed changes in line with a Statement of Common Ground signed by the Council and Jockey Club Racecourses (February 2026), but overall there are limited implications for sustainability objectives beyond those that relate to the ongoing operation of Epsom Downs Racecourse and the associated racehorse training industry. There are also a range of proposed changes to designations covering the Racecourse, as shown on the Policies Map (see discussion below).
- Policy S11 (Design and Heritage) – substantially re-written to align and avoid repeating national policy and to ensure a focus on locally specific issues and opportunities. Density requirements are unchanged.
- DM15 (Green Belt) – substantially re-written to align and avoid repeating national policy and to ensure a focus on locally specific issues and opportunities.
- DM25 (Biodiversity Net Gain) – now proposed to be a DM policy rather than a strategic policy. The policy is largely rewritten but implications are limited. Reference is kept to the 'higher requirement' specified in some site allocation policies (this is 20% for Green Belt allocations) and the policy now also makes reference to "or on unallocated sites that lie outside the urban area..."
- DM19 (Open Spaces, Outdoor Sport and Recreation & DM20: Social Infrastructure and Community Facilities) – these policies have been amended to ensure a clearer distinction between DM19 & DM20. Previously they overlapped. The policies have been strengthened with the aim of maximising community benefit through measures such as community use agreements.
- Policy S9 (Economic Development) – there are extensive proposed changes but the policy intent remains broadly unchanged. Changes are considered to be of limited significance.
- S16 (Flood Risk and Sustainable Drainage) – largely rewritten but implications are limited. There is now reference to the sustainable drainage hierarchy, in line with standard practice.
- Policy S2 (Viable Development) – this policy is proposed to be renamed and the policy has been re-ordered and some adjustments made but there are no substantive changes of significance.
- DM24 (Amenity Protection) – now proposed to be a DM policy rather than a strategic policy.
- Monitoring framework – there are a number of proposed adjustments.

2.3.2 Also, the following two policies from the Submission Local Plan are proposed to be deleted:

- S13 (Preserving identity of place with heritage), as previously presented in the Submission Local Plan. This is because policy is adequately set out in Policy S11.
- DM21 (Education Infrastructure) - deleted as now adequately addressed by policy DM20.

2.3.3 Finally, with regards to proposed changes to the Policies Map, these broadly involve:

- Site allocations – all of the proposed changes introduced above are now reflected.
- Epsom Downs Racecourse – the designated racecourse area is now reduced in extent.
- Racecourse Training Zones – a number of adjustments including deletion of outlying areas.
- Racehorse movement corridors – are now defined.
- Sites of Nature Conservation Importance– a new SNCI is defined and one boundary is adjusted.⁵

⁵ These are sites designated as locally significant for nature conservation. They are typically referred to as Local Wildlife Sites.

2.4 Conclusion

- 2.4.1 This section has sought to introduce the proposed modifications and undertake a 'screening' process to determine those aspects that should be a focus of the appraisal in Section 4 with a view to ensuring a focus on significant effects, and in the knowledge that there is no requirement to appraise each and every proposed modification in isolation (rather, the focus must be on appraising the proposed modifications as a whole, just as the focus in the SA Report was on appraising the plan as a whole).
- 2.4.2 The conclusion is that a focus of appraisal should be on proposed changes to housing land supply (and consequential changes to the housing requirement), as per the approach in the SA Report. Proposed changes to site-specific and thematic policies should be a focus of the appraisal in Section 4, although it is reasonable for this to be 'targeted', specifically with discretion applied in respect of which are discussed and where within the appraisal (i.e. there is no need to appraise every proposed change under every element of the SA framework).

3 Reasonable alternatives

- 3.1.1 In light of the discussion above, there is a need to make a decision regarding whether or not there is a need to formally define, appraise and consult on reasonable alternatives (RAs) at the current time.
- 3.1.2 By way of context, over the course of the SA process to date (an Interim SA Report, the SA Report and the recent SA Report Addendum) the focus has been on RAs in the form of 'growth scenarios', which are defined as alternative approaches to land supply in order to provide for development needs alongside wider plan objectives (or, in short, alternative key diagrams). This was with a view to focusing on RAs likely to generate meaningfully different significant effects and, indeed, which go to the heart of the plan.
- 3.1.3 In turn, a key question is whether there are any RA 'growth scenarios' at the current time, in light of latest evidence and understanding. Key considerations are as follows:
- New proposed allocations – attention focuses on the four new proposed Green Belt allocations, but all of these sites have been explored in detail over the course of the SA process to date and were discussed in detail at the examination hearing session in July 2026. Subsequently the Inspector has not given any indication that any of the new proposed allocations warrant particular ongoing scrutiny, and all are appraised within Section 4, i.e. as part of the appraisal of the proposed modifications as a whole.
 - Omission sites – four omission sites featured in the RA growth scenarios defined, appraised and consulted upon earlier this year,⁶ and then a fifth omission site of note is aforementioned COL017 (Land West of Burgh Heath Road) which was previously identified as a potential allocation but is now an omission site. The key strategic context that previously informed the view there is a reasonable need to explore higher growth scenarios involving omission sites remains unchanged, namely that the Local Plan is set to generate significant unmet housing need that risks staying unmet. However, there has now been ample opportunity to consider higher growth scenarios, such that the current proposed housing land supply and housing requirement is considered to be firmly justified. The Inspector has not given any indication that there remains a need to give ongoing consideration to higher growth scenarios, and it is difficult to suggest that any of the omission sites in question stand out as marginal (i.e. as having a particular case for allocation). With regards to COL017, this was considered in detail at the examination hearings leading to a decision that it is not suitable for allocation. The other site of particular note is then HOR007 (Noble Park), in that this was tentatively identified in the May 2026 SA Report Addendum as sequentially preferable to the remaining three omission sites (in particular due to generating relatively limited concerns in terms of Green Belt impacts). However, HOR007 is associated with a number of constraints and challenges, particularly in terms of biodiversity, as shown through the appraisal of RA growth scenarios presented in the May 2026 SA Report Addendum.
- 3.1.4 In conclusion, there are no reasonable alternatives for appraisal and consultation at the current time.

⁶ See Table 5.4 within the SA Report Addendum published in May 2026. Specifically, the four omission sites were HOR007 (Noble Park), which featured in Growth Scenarios 5 and 6, and then three sites that featured only in Growth Scenario 6 (the highest growth scenario), namely HOR002 (Hollywood Lodge), COL019 (Land east of Burgh Heath Road) and COL023 (Land near Downs Road east).

4 Appraisal of proposed main modifications

4.1 Introduction

- 4.1.1 The primary aim of this section is to present an appraisal of the proposed MMs, as introduced above, under the SA Framework (see Section 3 of the SA Report), at the core of which is a list of 13 topics.
- 4.1.2 The aim is not to discuss every MM systematically under each element of the SA framework, but rather to present a targeted appraisal guided by the discussion in Section 2.
- 4.1.3 A secondary aim is then to consider the 'cumulative' effect of the proposed MMs in combination with those aspects of the Submission Plan not proposed to be modified and, in doing so, update the conclusions on the Submission Plan reached within the SA Report (2024).

4.2 Accessibility (to community infrastructure)

- 4.2.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

"In conclusion, the Local Plan as a whole is predicted to result in a 'moderate or uncertain' positive effect on the baseline (accounting for established objectives)... There is a case for predicting significant positive effects recognising that the baseline situation is one whereby growth comes forward in a more piecemeal and ultimately sub-optimal way giving rise to issues and opportunities missed. However, on the other hand, the community infrastructure opportunities set to be realised through the plan are of somewhat limited significance (although there remains flexibility to consider delivery of a new school at Horton Farm, should this be required)."

- 4.2.2 Beginning with the 12 new proposed urban allocations, these are broadly supported in that there is support for growth in the urban area from an accessibility perspective. Also, several are proposed to be mixed use, albeit in part to avoid or mitigate loss of existing commercial / community / leisure floorspace. Further considerations are: A) proposed site specific policies for several of the sites potentially indicate a degree of opportunity in terms of improved permeability / connectivity through the urban area; and B) at one site there is a requirement as follows: *"Retain active ground floor retail frontages along the parts of the site that... form part of the Primary Shopping Area for the Town Centre."*
- 4.2.3 With regards to the two smaller proposed Green Belt allocations to the west of the urban area, these were discussed as follows in the previous SA Report Addendum (May2026): *"...unlikely to deliver anything of significance in terms of new or upgraded community infrastructure, but this is a reasonably accessible location in relative proximity to the town centre, and it appears that neither site performs a significant role in terms of providing accessible or amenity greenspace."* The sites are close to the B280 and around 1.5km from the town centre, and they also benefit from good access to Epsom Common and Horton Country Park. Focusing on the northern-most of the two sites, the proposed site specific policy in respect of access is of note: *"Provide safe and appropriate: i) vehicle, pedestrian and cycle access to the site from Cuddington Glade that does not result in the loss of any existing parking provision to serve the established residential dwellings that adjoin the site; ii) pedestrian and cycle access to the site from the established footpath bordering the site to the north."*
- 4.2.4 With regards to Land at Priest Hill, the site is highly accessible and well-connected given its location adjacent to Ewell East Station, and furthermore there are a range of important site specific requirements that are supported from an accessibility perspective, including a requirement to provide a new 'community hub' to include a medical facility in line with the following requirement: *"Provide additional primary care capacity required to serve local needs. This could take the form of on-site provision integrated into a community building which accommodates primary health care provision alongside community health and wellbeing services required to meet the area's needs, or an equivalent financial contribution towards off-site provision of new or improvement to existing health facilities. The form of required additional primary care provision will be determined in consultation with the NHS at the time the site comes forward."*

- 4.2.5 Sports pitches are to be retained outside of the site boundary, and there is a notable requirement to: *“Establish a legal mechanism for long term management of green and blue infrastructure and children’s play space on the site, providing access for recreational purposes by the general public as well as residents of the development.”* Also, there is a requirement for a “landscaped station square”.
- 4.2.6 Finally, with regards to Downs Farm, this is a less accessible location relative to the Green Belt sites discussed above, but still reasonably located in terms of accessing the town centre and a rail station. Importantly, as a larger site there is good potential to require targeted new or upgraded community infrastructure alongside new homes, and site specific policy notably requires:
- Delivery of an employment hub (this is set out as a headline requirement for the site but is not elaborated on within the site specific policy).
 - *“Establish a legal mechanism to secure frequent bus services to serve the site in the long term and provide supporting infrastructure including bus priority measures where feasible.”*
 - *“Provision of a new specialist school of up to 2.5ha on the site.”*
 - *“Provide additional primary care capacity required to serve local needs [with the rest of the policy requirement taking the same form as that discussed above for Land at Priests Hill].”*
 - *“Provide permeability through the site for pedestrians and cyclists to provide connectivity between adjoining residential areas and the open space at land to the South of College Road...”*
 - *“Provide offsite highway improvements along Reigate Road and College Road to improve pedestrian and cycle infrastructure with a focus on improving safety and improving crossing opportunities.”*
 - *“Provide financial contributions towards improvements at Epsom Downs Station.”*
- 4.2.7 There are no policy requirements regarding the extent or spatial configuration of onsite green infrastructure / open space / play space in respect of the part of the site to the north of College Road (i.e. the part of the site that will deliver new homes). However, with regards to the proposed open space to the south of College Road, the requirements are as follows:
- *“Provide public open space incorporating walking and cycling routes providing connections between College Road, Longdown Lane South and Epsom Downs Station.”*
 - *“Provide playing pitches and new supporting infrastructure including changing facilities that are served by utilities and car parking for users.”*
- 4.2.8 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the positive appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs. It remains the case that the plan performs well in terms of directing growth in line with accessibility objectives including by supporting sites that can deliver targeted new or upgraded community infrastructure.

4.3 Air quality

- 4.3.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“In conclusion, the Local Plan as a whole is predicted to result in a **neutral effect** on the baseline (which is broadly one of improving air quality, reflecting the move to electric vehicles, albeit particulate pollution from EVs will remain an issue). The distribution of growth does not give rise to any significant concerns, and a more significant consideration is potentially in relation to the total quantum of growth that is supported. On the one hand, as a more heavily urbanised part of Surrey there are some relative air quality issues within the Borough. However, on the other hand, there is relatively low car dependency and providing for unmet housing need distant from source can lead to problematic travel patterns. Also, some towns in wider Surrey are subject to significant air quality constraint. With regards to DM policies, there is a need for an ongoing focus on ensuring that growth-related opportunities to deliver improvements to sustainable transport infrastructure (also bus services) are realised.”*

- 4.3.2 None of the new proposed allocations are thought to give rise to a significant concern in terms of significantly impacting local air quality either alone or in combination. Land at Priest Hill was discussed in the SA Report as being 670m from Ewell AQMA but this AQMA was recently revoked. In any case, the site is located adjacent to Ewell East railway station, and will likely deliver modest onsite retail, such there should be the potential to achieve a degree of modal shift away from reliance on the private car.
- 4.3.3 Finally, it is noted that at two of the new proposed allocations there is a requirement as follows: *“Provide suitable noise and vibration attenuation measures to ensure that future occupiers are not subject to a significant adverse level of noise disturbance from the A24 and neighbouring uses.”*
- 4.3.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the neutral appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

4.4 Biodiversity

- 4.4.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“In conclusion, the Local Plan as a whole is predicted to result in a **neutral effect** on the baseline. The proposal is to focus Green Belt allocations to the west of the urban area, where there is biodiversity sensitivity... however, most of the sites are relatively unconstrained, site-specific opportunities can be identified and the proposal is to require 20% BNG for three of the five sites. The other key consideration is growth quantum, in that unmet housing need could lead to increased pressure for growth in elsewhere in Surrey, where there is quite extensive biodiversity constraint, including internationally designated sites.”*

- 4.4.2 With regards to proposed changes to the spatial strategy, the previous SA Report Addendum (May 2026) found the proposed approach (as amended) to perform well, with key considerations including:

- None of the new proposed urban sites are known to be subject to significant constraint.
- The two sites to the west have limited constraint, although the northern site is partly constrained by Tree Protection Orders (TPOs) and, in this regard, it is important to note that the current assumed capacity of 50 homes is at the upper end of the capacity range established through the LAA.
- Land at Priest Hill is overall considered to be subject to limited biodiversity constraint. The SA Report (2024) explained: *“Land adj. Ewell East Station links very closely to Priest Hill SNCI. However, there is little reason to suggest that development would lead to major issues. Problematic recreational pressure is potentially the ‘impact pathway’ of greatest concern, but Priest Hill is managed as a nature reserve by Surrey Wildlife Trust (who may wish to comment through the consultation).”* However, it is noted that the nature reserve was previously playing fields, as discussed [here](#).
- Finally, with regards to Downs Farm, whilst this is a larger site it is subject to limited constraint, and the potential to deliver targeted onsite biodiversity gains can be envisaged. The SA Report (2024) discussed the strategic importance of the southern part of the main allocation site. Also, over the course of the SA process there has been discussion of a risk that land to the south of College Road could come under pressure for development, but it is now clear that the proposal is to retain this land as open space.

- 4.4.3 With regards to site specific policies for the new proposed allocations:

- Urban sites – TPOs are referenced within policies for two of the sites, and at two other sites there is a requirement to: *“Ensure the site layout maximises retention and safeguarding of mature trees, incorporating these in a coherent landscaping strategy for the site.”*
- Adjacent Green Belt sites to the west – at both sites there is a requirement as follows: *“Ensure the site layout maximises retention and safeguarding of mature existing trees, covered by Tree Preservation Orders and other existing trees both within and beyond the site boundary, incorporating these in a coherent landscaping strategy for the site.”*
- Land at Priests Hill – there are no site specific requirements beyond the standard requirement for Green Belt sites to: *“Achieve a measurable biodiversity net gain of at least 20%...”*
- Downs Farm – there is a requirement to: *“Ensure the site layout maximises retention and safeguarding of trees covered by Tree Preservation Orders and other existing trees, incorporating these in a coherent landscaping strategy for the site.”*

- 4.4.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the neutral appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

4.5 Climate change adaptation

- 4.5.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“In conclusion, the Local Plan as a whole is predicted to result in a **neutral effect** on the baseline. Focusing on flood risk, few concerns were raised through the consultation in 2023, and since that time detailed work has been undertaken through a Strategic Flood Risk Assessment (SFRA). Overheating risk is another important climate change adaptation / resilience consideration (as understood from the EEBC Climate Change Study, 2023) and, in this regard, there is a degree of support for the ‘balanced’ nature of the proposed spatial strategy; specifically, the proposal to avoid undue high-density development...”*

- 4.5.2 None of the new proposed allocations are subject to significant flood risk. There is a degree of surface water flood risk around the edge of Downs Farm, but there is little reason to suggest that this would act as a significant hinderance to safe access or otherwise hinder effective masterplanning, nor is it possible to suggest any significant risk of increased surface water runoff leading to significant downstream flood risk. With regards to urban allocation options, there can sometimes be a tension between urban intensification objectives and flood risk objectives, but there is often good potential to avoid and mitigate risk including through site design. The current list of 12 sites was whittled down from an original shortlist of 13 on flood risk grounds, as discussed in Section 5.3 of the previous SA Report Addendum (May 2023).
- 4.5.3 With regards to site-specific policies for the new proposed allocations, the key point to note is the following requirement for any sites affected by surface water flood risk: *“Incorporate sustainable drainage measures to address and mitigate the risk of surface water flooding, in accordance with Policy S16.”*
- 4.5.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the neutral appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

4.6 Climate change mitigation

N.B. the focus here is on built environment decarbonisation with transport discussed subsequently.

- 4.6.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“In conclusion, having taken account of stringent / good proactive proposed DM policy, the Local Plan as a whole is predicted to result in a **neutral effect** on the baseline. This is a departure from the conclusion reached in respect of Growth Scenario 5 in Section 6 and reflects the requirement for net zero development (to an exacting standard, i.e. onsite and otherwise in-line with the energy hierarchy, and with application of an energy-based method for the purposes of calculating and communicating performance).”*

- 4.6.2 In short, the appraisal concluded a neutral effect for the plan as a whole despite having concluded a ‘moderate or uncertain’ negative effect for the spatial strategy / site allocations aspect of the plan, after having taken into account the proposal for quite stringent development management policy.
- 4.6.3 With regards to the new proposed Green Belt allocations, there is no reason to suggest that any are associated with a particular built environment decarbonisation opportunity. However, all are fairly uncomplicated greenfield sites such that there is no reason to suggest that there would be abnormal development costs that would affect the potential to viably deliver net zero carbon development.
- 4.6.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the neutral appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs. There is a clear case for taking a proactive approach to growth in a Borough where there is strong development viability and therefore good potential to deliver net zero carbon developments.

4.7 Communities and health

N.B. the aim of the discussion is to build upon (rather than repeat) the discussion under 'Accessibility'.

- 4.7.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

"In conclusion, the plan has been iterated over a number of years and in light of extensive consultation. There remain community concerns with the proposed approach to growth at a number of locations, such that there is a 'communities' case to be made for lower growth, but any such approach would also lead to a risk to progressing the plan to adoption, and a priority is undoubtedly adopting a Local Plan in good time so as to avoid further sites coming forward under the presumption in favour of sustainable development (including 'planning by appeal'). Community concerns with growth are also allayed on account of the proposed suite of DM policies, both site-specific and borough-wide, and there is confidence in respect of Whole Plan Viability (and, in turn, confidence that the site allocations can deliver in a way that aligns with policy). Overall a 'moderate or uncertain positive effect on the baseline is predicted."

- 4.7.2 It is also acknowledged that there are local community concerns in respect of certain and potentially all of the new proposed Green Belt allocations. This is perhaps most notably the case for Downs Farm, given its scale and because it is located within the Green Belt gap between Epsom and Banstead / Nork. However, there is also a need to account for the community benefits of an up-to-date Local Plan, as opposed to a baseline situation where development may come forward without an up-to-date Local Plan.

- 4.7.3 Finally, the following bullet points cover proposed changes to site-specific policies for submission allocations, all of which are considered to be beneficial in terms of communities-related objectives:

- For the two largest submission urban allocations there is new proposed policy text specifying that: A) access should be *"designed to minimise potential conflict between car users, pedestrians and cyclists"*; and B) development should include *"mixed use ground floor active frontages providing Commercial, Business and Service floorspace to provide natural surveillance of the public realm."*
- At 10 submission urban allocations there is added detail regarding access requirements, for example: *"Provide safe and appropriate vehicle, pedestrian and cycle access to the site from East Street..."*
- New policy text is added in respect of car parking for several of the submission urban allocations. In three cases the new requirement is: *"Consider the findings of the Councils car parking study and its recommendations in relation to public car parking provision at the site."*
- At three submission urban allocations there is a new requirement as follows: *"Consider the site's prominent location for a high-quality designed landmark building."*
- At one of the submission urban allocations there is a new requirement as follows: *"Maximise linkages with the town centre by integrating cross site movement routes for pedestrians and cyclists."*
- At one of the submission urban allocations there is a new requirement for a landscape strategy that *"frames and provides intervisibility of Dullshott Green as a public space."*
- For many sites there is a new proposed requirement to ensure that site allocations involve *"sensitive design incorporating positive elements of local character and appearance."*
- At one submission urban allocation there is a new requirement to: *"Design the scheme to ensure the amenity impacts on future occupiers from adjacent non-residential uses is adequately addressed."*
- At one submission urban allocation for extra care accommodation there is a new proposed requirement to: *"Facilitate access to public transport including bus or other public transport services including facilities that encourage public transport use."*
- At one proposed urban allocation (Epsom Hospital), there is a new requirement as follows: *"Provide offsite highway improvements: i) along Woodcote Green Road to improve safety and public transport infrastructure ii) along Dorking Road to improve public transport infrastructure."*
- At three of the submission Green Belt allocations there is a new requirement as follows *"Establish a legal mechanism to secure or enhance service frequency of bus services operating in the vicinity of the site to ensure connectivity to the wider area."*

- At one of the submission Green Belt allocations there is a new requirement to: *“Provide off site improvements to Chantilly Way to improve connectivity from the site to adjacent site allocation SA35 to improve access to bus services.”*
- At one of the submission Green Belt allocations there is a new requirement to: *“Facilitate access to public transport including bus services operating within the vicinity of the site...”*
- At Horton Farm (the largest of the submission Green Belt allocations) there is a new requirement to ensure pedestrian and cycle connectivity to Horton Centre.

4.7.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the positive appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs. Whilst there is a case for lower growth, as discussed in the previous SA Report Addendum, there is also a need to factor in that the Local Plan could risk being found unsound such that there is a risk of ongoing development pressure from ad hoc planning applications under the presumption in favour of sustainable development.

4.8 Economy and employment

4.8.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

“In conclusion, a ‘moderate or uncertain positive effect on the baseline is predicted, including given that through protection and enhancement of existing employment areas the Local Plan will ensure an employment land supply in line with the needs set out in the HEDNA (2023). However, there is a degree of uncertainty on account of the scale of unmet housing need, recognising the importance of delivering housing for the local economy, including family and affordable housing.”

4.8.2 Firstly, it is noted that some of the new proposed urban allocations are proposed to be mixed use, albeit in part to avoid or mitigate the commercial / community / leisure floorspace currently on site.

4.8.3 With regards to the new proposed Green Belt sites, the key point to note is that Downs Farm includes existing farm buildings used for offices as well as a warehousing and distribution business. However, the proposal is to deliver an onsite ‘employment hub’ which serves to mitigate any concerns.

4.8.4 Final considerations are: A) there is clear support for boosting housing supply / reducing the gap between the housing requirement and LHN, because providing for housing needs supports the local economy; B) with regards to wider proposed modifications, there is support for the new wording clarifying the need / supply position although, as discussed in Section 2, there are no substantive implications; and C) there is broad support for the range of proposed changes agreed with the horseracing industry (see Section 2).

4.8.5 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the positive appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

4.9 Historic environment

4.9.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“In conclusion, an overall **neutral effect** is predicted... Historic England did not raise significant concerns through the consultation in 2023, although it is recognised that they may wish to comment on the proposed focus of growth in and around the Hospitals Cluster Conservation Area at the current time.”*

4.9.2 With regards to proposed changes to the spatial strategy:

- Certain of the new proposed urban allocations are known to be subject to a degree of constraint, with at least one including a listed building. However, when redeveloping or otherwise intensifying urban sites there is typically good potential to mitigate impacts or indeed deliver benefits.
- The two proposed smaller Green Belt allocations to the west are subject to limited or low constraint.
- Land at Priest Hill is subject to low constraint.

- Downs Farm is subject to a degree of constraint, with the SA Report (2024) explaining: “[Downs Farm] is adjacent to a conservation area associated with an early C20th housing estate, and land within the site does rise away from the conservation area; however, the proposed greenspace could mitigate any visual impacts. The site promoter has submitted information suggesting that impacts can be suitably avoided and mitigated, but a degree of residual concern remains.”

4.9.3 With regards to site-specific policies for the new proposed allocations:

- At one urban site there is a requirement to: “Ensure the re-use the stained-glass window from the locally listed building located on the site in any future development proposals....”
- At a number of urban sites there is a requirement to: “Conserve or enhance the significance and setting of [a named conservation area] through sensitive design incorporating positive elements of local character and appearance.”
- At one urban site there is a specific requirement as follows: “Retention of the Grade II listed wall that forms part of the site boundary.”
- At several sites there is a requirement to: “Undertake archaeological investigations in accordance with Policy DM13, taking account of the site’s location within an Area of High Archaeological Potential.”
- At Downs Farm the requirement is to: “Conserve or enhance the setting of the Higher Green / Longdown Lane Conservation Area that lies to the north of the site and listed buildings located in close proximity to the site, through sensitive design incorporating positive elements of local character and appearance.”

4.9.4 With regards to proposed changes to site-specific policies for submission allocations:

- At one site there is a new proposed requirement to: “Undertake and submit an appropriate desk-based assessment and written scheme of investigation due to....”
- At one site the previous requirement to conserve and enhance the part of the building that is Grade II listed is now proposed to be replaced by a requirement to ‘retain and convert’.
- At one site there is a new requirement to account for a Grade II listed water tower.
- At one of the submission Green Belt allocations (Chantilly Way) the submission requirement to account for nearby heritage assets is proposed to be deleted. This is not thought to give rise to a concern.

4.9.5 Finally, as discussed above there are a range of proposed changes to Policy S11 (Design and Heritage) but there are not considered to be any significant implications for historic environment objectives.

4.9.6 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the ‘moderate or uncertain’ negative appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs. It remains the case that there are unavoidable tensions with historic environment objectives, albeit there is also a need to acknowledge that the baseline scenario is one whereby growth comes forward without the benefit of up-to-date local plan.

4.10 Homes

4.10.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“In conclusion, there is a clear need to predict a negative effect on the baseline, which is one whereby planning applications would be considered in the context of standard method LHN rather than the much lower proposed housing requirement. However, 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 provide a mix of affordable homes and for Gypsy and Traveller accommodation needs. On balance it is considered appropriate to predict a ‘**moderate or uncertain**’ negative effect for the Local Plan as a whole, but this is marginal, i.e. there is a case for predicting a negative effect given the extent of unmet housing need generated.”*

N.B. the appraisal concluded a ‘moderate or uncertain’ negative effect for the plan as a whole despite having concluded a ‘significant’ negative effect for the spatial strategy / site allocations aspect of the plan.

- 4.10.2 As discussed in Section 2, the proposal now is to significantly boost housing land supply and, in turn, the housing requirement, but the effect would still be that the Local Plan generates significant unmet housing need, and there is little if any confidence that this would be provided for elsewhere in the short or medium term (but in the fullness of time there will be potential for future local plans under Local Government Reorganisation and devolution to explore how best to provide for Surrey's housing needs).
- 4.10.3 Further considerations relate to the specific additional site allocation options:
- **Deliverability** – the new proposed Green Belt allocations can deliver relatively early in the plan period, which is important as the NPPF sets out that there must be a demonstrable five year housing land supply (as measured against the housing requirement, and with a 'buffer' applied as appropriate) at the point of plan adoption, and it is in the Borough's interest to be confident that a five year land supply can be maintained over the early years of the plan period ahead of a supply boost through a new Local Plan.
 - **Viability** – all of the greenfield sites are relatively uncomplicated without readily apparent abnormal development costs likely to impact development viability and, in turn, the ability to deliver affordable housing alongside delivering on wider policy asks such as in respect of net zero development.
 - **Site-specific proposals** – Cuddington Glade is currently the subject of a planning application for a care home, which is considered to be a positive; and the promoters of Land at Priest Hill recently held a pre-application consultation that included a commitment to delivering 50% "family sized housing".
 - **Specialist accommodation** – the Submission Local Plan proposes that sites with a capacity above 200 homes should deliver specialist accommodation and, in this regard: A) Land at Priest Hill (275 homes) recently held a pre-application consultation and the proposal is not to deliver specialist accommodation, although it should be noted that the scheme does propose to deliver benefits in several other respects (as discussed); and B) Downs Farm is then the largest of the additional allocation option (530 homes) and there could be the potential to work with the site promoters to determine what the scheme should deliver, working within the parameters of viability.
 - **Affordable housing** – it is important to be clear that virtually all affordable housing in the Borough over recent years and decades has been delivered by market led housing schemes, such that boosting the supply of market led housing schemes is a very proactive step in terms of affordable housing delivery. For example, the largest of the new allocation options – Downs Farm – could likely deliver the full policy quote of affordable housing, such that it alone could deliver more than 100 times the number of affordable homes delivered across the Borough in 2024/25.⁷
- 4.10.4 With regards to wider proposed modifications, the key point to note is the new proposed requirement in respect of 50% affordable housing on Green Belt sites. This aligns with national policy, but is broadly supported and it is understood that this requirement can be viably delivered without any undue knock on implications for the achievement of wider policy objectives. Otherwise, there are no major proposed changes to development management policies with cost / viability implications such that there are no additional concerns around delivery risks (i.e. sites failing to deliver or failing to deliver in line with the anticipated trajectory) or sites coming forward with less than the full policy quota of affordable housing (or with compromises made regarding the affordable housing tenure mix).
- 4.10.5 Finally, the proposal is to amend Policy S8 (Gypsies, Travellers and Travelling Showpeople) by removing the requirement to deliver a minimum of 3 pitches/plots on windfall (i.e. unallocated) sites involving 200+ homes. This gives rise to a degree of tension with objectives relating to providing for Gypsy and Traveller accommodation needs, because there is a need for 18 pitches over the plan period and the proposal is to deliver on 10 pitches at Horton Farm. However, there is the potential for windfall sites to come forward (albeit in a constrained Borough such as Epsom and Ewell windfall site opportunities are limited). Also, there can be little confidence that in practice any windfall sites will come forward for 200+ homes, let alone ones that would be suited to deliver pitches/plots (noting that neither Downs Farm nor Land at Priest Hill is required to deliver pitches/plots), such that removing the requirement adds to clarity regarding supply.

⁷ The HEDNA (2023) identifies a need for 652 affordable homes per annum, which is in stark contrast to recent delivery, as set out across the annual Authority Monitoring Reports, with it notably the case that only two affordable homes were delivered in the Borough in the 2024/25 monitoring year, of a total of 112 homes delivered. This equates to delivering affordable housing at a rate of 1.7%, and the average rate over the period 2019 to 2025 is 10.45% (although it is 25.7% over the period 2007 to 2025). It is important to note that greenfield sites are much better placed to deliver a high proportion of affordable, indeed, it is not uncommon for brownfield sites to deliver no affordable housing on viability grounds.

- 4.10.6 In **conclusion**, the proposed MMs have clear positive implications for the achievement of housing / 'homes' objectives; however, on balance it is still considered appropriate to conclude that the Submission Local Plan plus MMs will lead to a 'moderate or uncertain' negative effect on the baseline.

4.11 Land and soils

- 4.11.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*"In conclusion, a **neutral effect** is predicted, as per the conclusion reached in Section 6. It is important to recall that development would continue under the baseline scenario."*

- 4.11.2 Focusing on agricultural land, Downs Farm is the only new proposed allocation to have recently been in productive agricultural use, and it is likely to comprise best and most versatile agricultural land. The other greenfield new proposed allocations appear to have less agricultural potential, e.g. more suited to grazing horses or, in the case of Land at Priest Hill, sports pitches. <https://pegasuspg.maps.arcgis.com/apps/instant/compare/index.html?appid=ab3ff95403bb437bac864ce538d14603>

- 4.11.3 One further consideration is that there is a 'waste consultation area' associated with a waste transfer site adjacent to Downs Farm (former Epsom Chalk Pit / Lime Works). However, this is a constraint but has been accounted for in site promoter masterplanning.

- 4.11.4 In **conclusion**, the proposed MMs give rise to a degree of tension in terms of the loss of agricultural land, but it remains appropriate to predict a neutral effect in respect of the Submission Local Plan plus MMs.

4.12 Landscape

- 4.12.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*"In conclusion, the plan is predicted to have a **neutral effect** on the baseline, recognising that the baseline is a scenario whereby development continues to come forward. The plan seeks to make best use of previously developed land (working within the parameters of work through the LAA to identify sites that are available) and the proposed Green Belt allocations are overall supported from a landscape perspective (in isolation and in combination, acknowledging that they are clustered in the west of the Borough). There is scope for further site-specific policy, e.g. concept masterplans for key sites, to provide further confidence that they can be successfully brought forward in a timely manner without undue landscape impacts."*

- 4.12.2 With regards to proposed changes to the spatial strategy:

- None of the new proposed urban allocations are known to generate a significant concern in respect of landscape or townscape impacts.
- The two proposed Green Belt allocations to the west are small sites that give rise to limited concerns.
- Land at Priest Hill has limited or low sensitivity.
- Downs Farm has a degree of landscape sensitivity, with the SA Report (2024) explaining: "... the proposal to focus housing in the less sensitive northern part of the site is noted, and it is recognised that the Green Belt Study Update (2024) indicates relatively limited landscape concerns but some concerns regarding topography / elevation where there is some visual sensitivity. However, concerns remain regarding pressure for future development within Green Belt parcel 35, to the south of the site, which would have the effect of closing a key settlement gap, plus this is rising land towards Epsom Downs. This concern was raised in the ISA Report (2023), mindful that the land is in the control of the site promoter, but in response the site promoter argues that this concern is not legitimate."

The latest situation is that concerns are potentially allayed by the clear proposal to maintain 'Green Belt parcel 35' (i.e. land within the site red line boundary to the south of College Road) as open space.

- 4.12.3 With regards to site specific policies, there are a number of new proposed requirements that have already been discussed above that have broadly positive implications in terms of landscape objectives.

- 4.12.4 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the

neutral appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

4.13 Transport

- 4.13.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

“In conclusion, it is appropriate to predict a ‘moderate or uncertain’ positive effect.... Consideration should be given to integrating the findings of the LCWIP within site specific policies, with a view to realising growth-related opportunities as fully as possible.”

- 4.13.2 With regards to proposed changes to the spatial strategy:

- None of the new proposed urban allocations are known to generate a significant concern, either in isolation or in combination (including noting site-specific policy relating to car parking).
- The two proposed Green Belt allocations to the west are small sites that give rise to limited concerns, and they are considered to be quite well located, as discussed above under ‘accessibility’.
- There is a clear transport case to be made for supporting Land at Priest Hill.
- Downs Farm is more challenging as a larger site, with the SA Report (2024) having stated: “[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 options and frequency are not as good as from Epsom (in particular) and Ewell East).” The SA Report Addendum published in May 2026 further elaborated by explaining: A) the [connectivity score](#) within the centre of the site is quite low (42), but it is higher at the edge of the site adjacent to A-roads and there are opportunities to deliver transport upgrades (as discussed); and B) Downs Farm is a less accessible location within the Borough, but still in proximity to a train station, and transport opportunities have been highlighted through recent IDP work.

- 4.13.3 With regards to site specific policies, there are a number of new proposed requirements that have already been discussed above that have broadly positive implications in terms of transport objectives. Focusing on Downs Farm, there is support for requirements relating to: A) safe access; B) frequent bus services to serve the site; C) permeability through the site; D) targeted offsite enhancements along the both of the adjacent A-road corridors; and E) financial contributions to enhancement of Epsom Downs Station.

- 4.13.4 Finally, a key consideration throughout the SA process has been the need to minimise unmet housing need, as far as possible, because unmet need creates challenges for strategic transport planning, and can result in problematic commuting patterns.

- 4.13.5 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the positive appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

4.14 Water

- 4.14.1 For context, the SA Report (2024) reached the following conclusion in respect of the Submission Local Plan as a whole (Section 9 of the report):

*“In conclusion, and in line with Section 6, broadly **neutral effects** are predicted. It will be important to take account of consultation responses received from the Environment Agency and the water companies.”*

- 4.14.2 Focusing on the capacity of sewage treatment works, the SA Report (2024) concluded no major concerns under any of the growth scenarios appraised at that time, and explained that Thames Water had provided the following statement when consulted on the Infrastructure Delivery Plan (IDP):

“With regard to Hogsmill STW, no growth upgrades are proposed in AMP8 (from 2025-2030) and while growth is anticipated within the catchment there is not enough growth concentrated within the catchment to require a growth upgrade during AMP8. The proposed growth within Epsom and Ewell and other authorities within the catchment of Hogsmill STW will inform our projections for flows to the works and when growth upgrades may be required. A project is proposed in AMP8 to quadruple storm tank capacity by 2031. This will reduce spills from the STW and would also reduce the effect of new development on discharges from the works. In addition an upgrade is also proposed to the combined heat and power plant at the site.

Our adopted Drainage and Wastewater Management Plan can be found [\[here\]](#) and includes consideration of what actions will be necessary within the Hogsmill catchment over the next 25 years. Growth projected within the borough through the local plan will be taken into account in forecasts to help inform future updates to our DWMP and inform future business plan proposals. Future forecasts will take account of a range of data and information as it is people that use water and produce wastewater and not new buildings, as such forecasts need to take account of factors including local plan figures for housing delivery along with anticipated population growth and observed flows at existing works.”

- 4.14.3 This quote serves to highlight the importance of providing water companies with early certainty regarding the scale and location of growth in any given area to inform long-term planning for sewage treatment. Also, this is similarly the case with long term planning for water supply, which is an issue in several parts of the country at the time of writing, although not thought to be an issue affecting Epsom and Ewell.
- 4.14.4 The Regulation 19 representation received from the Environment Agency did not raise any significant concerns and this was similarly the case for in respect of the representation received from Thames Water (a RAG assessment was provided that considered each of the proposed allocations in turn).
- 4.14.5 The latest situation is then set out in the updated IDP (2026) as follows:
- “Thames water provided the following on the 19 March - “In relation to increasing the housing requirements in the local plan to 5,700 homes we are aware of capacity constraints at the STW serving the area. Further assessment is progressing with a view to delivering any upgrade when required during the local plan period taking account of the growth within Epsom and Ewell and other local authorities within the same catchments. However, we do not envisage a significant issue with supporting the increased levels of growth.”*
- 4.14.6 In **conclusion**, the proposed MMs do not give rise to significant effects or generate a need to amend the neutral appraisal conclusion from 2024 to reflect the Submission Local Plan plus MMs.

4.15 Overall conclusion

- 4.15.1 The appraisal finds that none of the proposed modifications generate significant effects, either alone or in combination. However, the proposed modifications do have positive implications for the achievement of sustainability objectives relating to meeting housing needs. The most significant aspect of the proposed modifications is the proposal to allocate four new Green Belt sites for a total of 937 homes and, in particular, a focus of the appraisal is the proposal to allocate Downs Farm, to the east of Epsom, for 530 homes. There are inevitably challenges associated with this site given its scale, current use (recent use for agriculture) and location, but as well as making a significant contribution to housing needs it can deliver benefits including affordable housing, land for a school, transport upgrades and large scale open space / sports pitches.
- 4.15.2 Finally, with regards to monitoring, there are extensive proposed modifications to the monitoring framework, although many of these relate to monitoring whether each of the proposed allocations delivers as anticipated. The suggestions presented in Section 11 of the SA Report (2024) still broadly hold true. Of note is the suggestion to ensure a focus on monitoring matters relating to Gypsy and Traveller accommodation needs, given a risk of there being unmet needs, and with a view to informing future needs assessments. Also, there could be merit in monitoring delivery of net zero developments (Policy DM10).