

Epsom & Ewell Local Plan Examination

Council Responses to Matter 3: Vision and the Spatial Strategy

12 September 2025

Issue 4: Is the plans approach to the vision and spatial strategy justified, positively prepared and consistent with national policy

Q4.1 Do the Strategic Policies of the Plan look ahead for a minimum period of 15 years from adoption as set out within paragraph 22 the Framework?

- 4.1 No. Should the plan be adopted in 2026 (as anticipated), it will cover a period of 14 years. We consider the NPPF provides flexibility with the para 22 stating that plans 'should' look ahead over a minimum 15-year period from adoption, as opposed to 'must'.
- 4.2 We consider it is disproportionate to extend the evidence base by a further year to extend the plan period, the council has committed to an early review of the Local Plan.

Q4.2 The Plan period starts from 2022. What is the justification for this and should it align with the submission date?

- 4.3 In early 2022 work commenced on commissioning and updating the evidence base to inform the Local Plan (2022-2040), including evidence on housing and economic needs and is therefore a snapshot in time of evidence upon which this plan is based. In addition, the Epsom and Ewell Core Strategy (adopted in 2007) plan period ran until 2022.
- 4.4 The council therefore considers the plan period should start in 2022 for the reasons set out above.

Q4.3 Does the key diagram on page 24 of the Plan represent the key diagram as required by paragraph 23 of the Framework?

- 4.5 Yes, the key diagram is on page 24 and clearly sets out broad locations for developments as required by the NPPF.

Q4.4 Is the Plan clear which are the strategic policies of the Plan? The Councils response to my initial letter (COUD_001) identified that the Plan could be more explicit in this regard and the Council have identified which policies they are identifying as strategic and non strategic policies. Is this list correct?

- 4.6 Yes, the Council's response to the Inspector's initial letter (Document reference: [COUD_001](#)) set out in Table 6 the strategic policies and in Table 7 the non-strategic policies. Within the Local Plan strategic policies start with a prefix of 'S' or 'SA' and non-strategic policies start with a prefix of 'DM'.

Q4.5 Does the plan present an appropriate spatial strategy, and in what way is this supported by the evidence base? In responding to this, the Council should have regard to paragraph 8 of the Framework.

- 4.7 Paragraph 8 of the NPPF sets out three overarching objectives for achieving sustainable development, an economic objective, a social objective and an environmental objective.
- 4.8 The Sustainability Appraisal (Document Reference [SD05a](#)) appraises 7 reasonable alternatives against social, economic and environmental objectives.
- 4.9 The Spatial Strategy of the Submission Local Plan is reasonable growth scenario 5 of the Sustainability Appraisal which is an appropriate strategy and justified, as it strikes the optimal balance across competing sustainable development objectives. The local plan will deliver:
- 4.10 Economic Objective:
- a. At least 4,700 houses to meet a range of needs in the Borough attracting investment and specifically planning contributions towards infrastructure provision e.g. Policy S1, S17.
 - b. It supports a thriving economy, encouraging diversification and a nighttime economy e.g. Policy S4, S9.
 - c. It safeguards land for the horse racing industry to help secure the long time sustainability of the sector. S9, DM8.
 - d. It promotes a competitive and well managed town centre, supporting a range of uses as well as retail within town and local centres S4, DM4.
- 4.11 Social objective:
- a. The plan will deliver 4,700 houses to meet a range of needs in the Borough e.g. Policy S1, S5, S6
 - b. Planning contributions from development will go towards a range of infrastructure including social infrastructure, DM20, DM21.
 - c. It protects existing green spaces and makes provision for new green spaces where possible S3, DM19.

- 4.12 Environmental objective:
- a. The plan protects the Borough's environmental assets from development and requires development to make net gain in biodiversity S18.
 - b. It supports development that contributes to and enhances the natural environment S14 and the development of green and blue infrastructure.
 - c. It supports the protection of sites that are important for nature conservation S14.
 - d. It promotes environmental and climate change standards in development and building S3, S16.

Q4.6 Document TP07 recognises that one of the key issues and challenges facing the borough is to deliver a range of housing that meets a wide range of needs, for example related to size, tenure (including affordable) and specialist accommodation. In what way will the spatial strategy proposed meet these objectives?

- 4.13 The spatial strategy sets a housing requirement of a minimum of 4,700 homes between 2022 and 2040, which is an average of 261 homes per annum. The delivery of this will be achieved through several strategic policies and site allocations which will help ensure a range of housing needs are met.
- 4.14 Strategic policies S5 Housing Mix and Type, S6 Affordable Housing, S7 Specialist Housing and S8 Gypsies, Travellers and Travelling Showpeople will ensure housing is delivered that meets the needs of the borough.
- 4.15 The allocations within the plan (SA1 to SA35) will deliver approximately 2,996 units, with the remainder of the housing requirement being met through completions, commitments and windfalls. The allocations comprise a mix of urban and greenfield sites and are a range of sizes, with the smallest sites delivering 5 units to the largest allocation (SA35) delivering 1,250 units.
- 4.16 This mix of sites will assist in delivering a range of housing to help meet different needs, with the smaller urban sites tending to deliver higher density development, being likely to comprise smaller flatted units, while the larger sites will provide a greater mix in terms of size of units, mix and tenure. For example, site allocation SA35: Horton Farm, a greenfield site, will deliver approximately 1,250 units which will include some specialist housing and self build in addition to gypsy and traveller pitch provision. Within the plan several sites have been allocated for specialist accommodation. These include SA7: Former Police and Ambulance Station Sites, SA13: Swail House, SA18: Land to the Rear of Rowe Hall, and SA30: Epsom General Hospital.
- 4.17 It is considered that the spatial strategy will therefore help address the need for a range of housing types to meet needs.

Q4.7 The proposed strategy would not meet the Boroughs objectively assessed housing needs by some considerable margin. In what way does the proposed spatial strategy support the Governments objective of significantly boosting the supply of homes (paragraph 60 of the Framework) by providing a sufficient amount and variety of land to come forward?

- 4.18 The Spatial Strategy will deliver approximately 48% of the Borough's housing need based on the standard method (Proposed Submission Local Plan, paragraph 3.9, document reference SD02). It is recognised that this is below the objectively assessed housing need figure however, this is the Council's preferred strategy which has maximised the potential to develop sustainable sites in the urban area with an emphasis on ensuring the density of development makes the most efficient use of land. The use of urban (and especially previously developed) land is augmented by the allocation of land in the Green Belt where that may be achieved sustainably. This has the particular advantage of allowing a wider range of housing to be built in significant numbers. The combined effect of this strategy will be to significantly boost the supply of housing in the borough whilst adhering to the tenets of sustainable development.
- 4.19 The Sustainability Appraisal (document reference SD05a), justifies the positive approach taken by the council which provide the optimal balance between social, economic and environmental objectives.
- 4.20 The quantum of housing to be delivered is significantly above the Council's previous housing requirement of 181 homes per year as set out in the Core Strategy 2007 and is significantly higher than the historic average delivery rate of 197 homes per annum since 2007 (as calculated from Table 8 in the Housing Topic Paper, page 4 document reference TP03). The spatial strategy is an ambitious and deliverable strategy having regard to multiple and challenging constraints that will make a significant contribution towards the Government's objective of boosting housing supply.

Q4.8 In what way will the proposed strategy deliver the mix of homes needed and is the Plan positively prepared in this regard?

- 4.21 The proposed strategy sets a housing requirement of a minimum of 4,700 homes between 2022, including policies
- a. The housing mix and type policy S5, which permit development that provides a mix of tenure, type, size that reflects the mix set out in the latest HEDNA
 - b. Affordable housing policy S6 requires development of 10 or more units to provide 40% affordable housing on greenfield sites and 30% on all other sites.

- c. S7 specialist housing which supports development proposals for specialist accommodation and requires developments proposals for over 200 units to provide specialist housing
- d. Gypsy and Traveller S8 policy safeguards existing sites and new sites where the meet the criteria set and meet unmet need. Sites of 200 units will be required to provide at least 3 pitches/plots

Policy S2 Sustainable Development

Q4.9 Parts 1 through to 3 (b) appear to repeat the requirements of the Framework. Is this a sound approach?

- 4.22 We consider that it is important to set out how the council will support the implementation of the presumption in favour of sustainable development. The policy builds upon the national policy requirements to provide some local context.