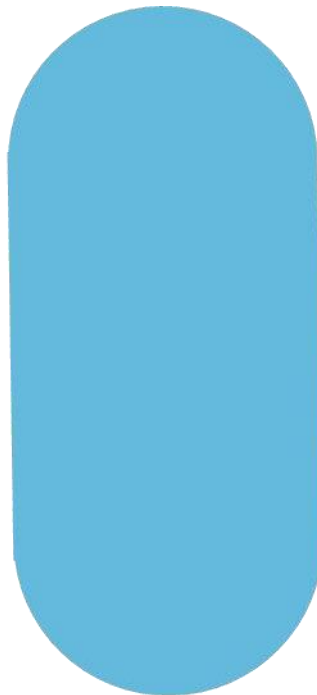




# EPSOM AND EWELL LOCAL PLAN EXAMINATION MATTER 4 HEARING STATEMENT

PREPARED ON BEHALF OF DANDARA SOUTH EAST

September 2025





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## 1. INTRODUCTION

- 1.1 This Matter Statement has been prepared on behalf of Dandara South East in respect of Matter 4 relating to the approach to the Green Belt.
- 1.2 Dandara has land interests in the Borough at Downs Farm, Epsom (hereafter referred to as “the Site”). The Site is not currently identified as an allocation in the draft Plan.
- 1.3 Notwithstanding specific land interests, this Matter Statement has been prepared in objective terms, in response to the Inspectors’ questions and have been considered in the context of the tests of ‘Soundness’. These require that a Plan is:
- Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 1.4 The most recent version of the National Planning Policy Framework was published December 2024 (NPPF 2024). Para 234, within Annex 1, sets out plan-making transitional arrangements which states policies in this version of the Framework apply from 12 March 2025 unless certain criteria apply. In this case, the Plan was submitted ahead of 12 March 2025 and the NPPF December 2023 continues to apply (hereafter referred to as ‘NPPF’). Reference is made to the NPPF 2024 where relevant.



## 2. THE GREEN BELT

**Q5.4. Are the exceptional circumstances outlined within paragraph 3.3 of TP02 to justify changes to the Green Belt boundaries suitably robust and do they justify the approach taken? A number of representations have stated that the Green Belt boundaries should not be reviewed as the Council has not done enough to optimise densities on brownfield sites. Are these concerns valid?**

- 2.1 We consider there are clear exceptional circumstances as justified by the evidence base, including TP02 as referenced.
- 2.2 In addition to TP02, the Sustainability Appraisal includes discussion (para 5.2.17 – 5.2.27) as to whether it is reasonable to explore setting the housing requirement at a figure above that of minimum housing needs. Whilst in the context of setting a housing requirement, the rational applies equally when considering whether exceptional circumstances exist. This includes:
- The new standard method calculation;
  - Local housing need figure being a “capped” figure, with the uncapped figure being 736dpa (which is evidently closer to the new Standard Method calculation);
  - The Borough’s affordability ratio (median house price to workplace-based earnings) being very high in the context of Surrey and the South East at 16.8 (in the top 10 highest in England);
  - Affordable need exceeding the housing need requirement (at 652 affordable homes per annum), and considerably greater than achieved in recent years (30 affordable homes on average over past 6 years); and
  - Very extensive unmet needs from neighbouring areas.
- 2.3 Table 5.2 of the Sustainability Appraisal identifies the potential components of supply, of which 1,416 dwellings are identified on non-green belt sites and a further 200 dwellings on Hospital Green Belt PDL. Non-GB / PDL sites are therefore identified to address only a portion of housing needs.
- 2.4 It is for the Council to respond to the specific criticisms, however even if there was a significant uplift in density of these sites, they evidently will not address minimum housing needs (10,242 dwellings) alone.
- 2.5 There is a necessity for Green Belt land to be released to accommodate growth needs. To not do so would undermine the ability of the Plan to deliver sustainable development and address persistent housing and affordability issues faced by the Borough. There are therefore justified exceptional circumstance to release Green Belt land



**Q5.6. The Framework states that the Plan should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. Has this been done and where is the evidence to explain this?**

- 2.6 New development in locations which are currently Green Belt can be brought forward in a way which delivers a variety of benefits, including improvements to the environment (notably through landscaping improvements and the biodiversity net gain regime) and facilitate access to new open spaces and wider access to the countryside and remaining Green Belt.
- 2.7 If necessary for soundness, these improvements could be secured via a Green Belt compensation strategy policy. This would provide clarity to applicants as to what is expected for sites removed from the Green Belt. The strategy would be proportionate (to the size of the development) setting out detail of:
- Retention of existing hedgerows and trees and other areas of biodiversity value;
  - New or enhanced green infrastructure;
  - Improvements to biodiversity, habitat connectivity and natural capital; and
  - New or enhanced walking or cycling routes, including connections to the wider right of way network.
- 2.8 For Downs Farm, these principles have been embedded within the indicative masterplan previously submitted to the Council. Alongside homes and affordable homes, the Site has potential to deliver a range of gains from a landscape, ecological and accessibility perspective. This includes enhanced pedestrian / cycle connectivity towards College Road and Reigate Road, as well as across land to the south (outside the Site, within Dandara's wider control, and remaining Green Belt) which creates a new link towards Epsom Downs.

**Q5.7. Paragraph 3.31 of document TP02 concludes that the Plan proposes a limited amount of land for Green Belt release and the same position would be unlikely in the event of a much larger release. How is the Council defining much larger' in the context of this Plan and where is the evidence base to support this conclusion?**

- 2.9 Whilst a "much larger release" may lead to greater impacts on the Green Belt, this has not been tested and is not a justified position. Nor does the statement apply equally to different sites / scenarios.



- 2.10 As set out in other matter statements, the lack of allocation for Downs Farm has not been justified by the evidence base. A growth scenario of Horton Farm + Downs Farm is not likely to lead to any greater significance effects than the chosen growth scenario if assessed in the Sustainability Appraisal (which it has not been).
- 2.11 Should Downs Farm be allocated this would result in an additional circa. 26.8 hectares being removed from the Green Belt. This would equate to a further circa. 2% of the Borough's Green Belt being released, whilst delivering an additional 675 dwellings (6.4% of housing needs), alongside numerous other benefits.
- 2.12 Further, the Green Belt Study makes clear the landscape sensitivity of Downs Farm is low and it performs weaker (6 overall) against the Green Belt purposes than other assessed sites. For instance, Horton Farm has an overall score against the purposes of 8, and Hook Road Area a score of 7. No other strategic Green Belt site has a score lower than 7.
- 2.13 The allocation of Downs Farm would still only result in a limited amount of land within the Green Belt being released. It would not comprise a "much larger release", nor would it undermine the overall function of the Green Belt. The evidence base supports its allocation and release from the Green Belt.

**Q5.8. GB01 (Green Belt Study Update 2024) and GB02 (Green Belt Technical Note 2023) present the remainder of the evidence base in relation to the Green Belt boundaries within the borough. It identifies a scoring system for sites based on selecting sites with the least harm to the Green Belt purposes. Has the Council applied the criteria in a consistent manner? A number of representors have outlined how sites which have been discounted have scored less in Green Belt terms. Is the Council clear in the reasons they have discounted sites and where is this information provided within the evidence base?**

- 2.14 As noted above, Downs Farm has been identified in the Green Belt Study as one of the lower performing Green Belt sites. Despite this, it has not been allocated, with other sites which perform stronger in terms of their role in the Green Belt being allocated.
- 2.15 We do not consider the Council has provided clear reasons or sufficient justification to discount Downs Farm as an allocation. Conversely, as set out in detail in our response to Matter 5 (re: site selection) we consider there are flaws in the approach the Sustainability Appraisal has taken to assessing the site in landscape terms, and conversely, the evidence base supports Downs Farm as a suitable site.

**Q5.9. Could the Council be doing more to address the 5500 dwelling shortfall?**



- 2.16 Yes. As set out throughout our matter statements we do not believe there is sufficient justification for the approach the Council has chosen to take which prioritises Green Belt protection over the goal of significantly boosting housing and meeting housing needs in full (or at least reducing the substantial unmet needs). Not enough weight is being given to the delivery of additional homes and affordable homes against the desire to minimise release of Green Belt land, especially Green Belt land which performs lower against the purposes of the Green Belt.
- 2.17 Downs Farm is a clear example of a site which has unjustifiably been discounted through the Local Plan process. Allocation of this site for 675 dwellings could have a meaningful effect in reducing unmet needs across the Plan period.