

# Epsom and Ewell Local Plan Examination

**Our ref** 14836/01/SSL/SBi  
**Date** 12 September 2025  
**From** Lichfields on behalf of Church Commissioners for England "The Commissioners"  
**ID** 155  
**Subject** **Matter 11 – Site Allocations**

## 1.0 Issue 13- Whether the proposed site allocations within the Plan are positively prepared, justified, effective and consistent with national policy

### All Site Allocations

**Question 13.1 – The following questions relate to all of the site allocations as identified within Chapter 4 Planning for Places part of the Plan. The Council should provide a full response for each allocation. [Table format suggested]**

1.1 Table 1 has been completed for the Commissioners' site at Horton Farm only (SA35).

Table 1 – The Commissioners' response to Q13.1 (SA35)

Inspector's question	Response
Are the site allocations correctly drawn and are the boundaries justified?	The SA35 boundary is justified as it is wholly within the Commissioners' ownership and is deliverable.
What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?	<p>Please see Table 1 of the Statement of Common Ground (SCG13), which aligns with the Local Plan Trajectory. It is envisaged that homes will be delivered across a 10-year period, commencing in 2030, with a build out rate of between 50–150 dwellings per annum (dpa) (average 125dpa).</p> <p>The estimated lead in time reflects realistic timescales relating to the submission and determination of a planning application for c.1,250 homes, following adoption of the Local Plan. There is also allowance for submission/determination of required details, prior to commencement.</p> <p>The annual build out rates have been informed by Savills - the Commissioners' appointed Agent. The estimated rate is realistic and (whilst at the upper end) is aligned to the Lichfields 'Start to Finish 3' analysis (March 2024) – which identifies an average annual build out rate for sites of 1,000–1,499 homes as between 68–101dpa (lower and upper quartile), with a maximum of 172dpa.</p>

Inspector's question	Response
<p>In what way does the allocation identify the infrastructure requirements necessary, together with the timing for any necessary infrastructure?</p>	<p>SA35 clearly identifies the scope of infrastructure requirements at a–I The Commissioners requests amendments to SA35 in order to ensure it is 'effective', by ensuring that there is flexibility to allow the relevant requirements to be based on evidenced local need at the time of assessing a planning application.</p> <p>The Commissioners' proposed amendments are set out at p.13 of the Regulation 19 representation form and at Appendix 2 of SCG13. Please also see question 13.6, below.</p> <p>With regard to infrastructure delivery; the Commissioners considers that the proposed Infrastructure Delivery Plan (IDP) could provide greater clarity around what infrastructure is expected to come forward at what stage during the plan period and how this relates to the proposed site allocations, including SA35. See Matter 5 statement.</p>
<p>Document HB06a sets out potential allocation wording as well as site development considerations. To what extent does the plan as drafted take the commentary regarding the individual site allocations into account?</p>	<p>n/a.</p>
<p>Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? Should these figures be identified as minimum capacity figures within the policy wording?</p>	<p>SA35 would make a significant contribution to the Council's housing trajectory/identified need, with a residential capacity of 'approximately 1,250' C3 residential units.</p> <p>The Commissioners' master planners, ADAM Architecture, informed by Savills, have prepared an initial masterplan for the site which indicates 1,250 is an appropriate approximate residential capacity for the site at Horton Farm, at this stage.</p> <p>However, the site capacity is to be informed by further design development including the design-led approach to optimisation while considering any site-specific technical constraints/opportunities. Further work will be required at the application stage to determine an appropriate final site capacity. Without this finer grain work which will only be available at the planning application stage – setting a minimum housing capacity for the site at this earlier stage risks setting a quantum that could only be achieved by lower-quality design that is less responsive to the Site's surrounding context, and one that may be</p>

Inspector's question	Response
	<p>unable to meet other policy considerations as a result (e.g. housing mix) and the other SA35 policy limbs (a–l).</p> <p>SA35 with its reference to 'approximately' provides this flexibility. To ensure SA35 remains effective, the Commissioners requests the C3 residential unit capacity is kept 'approximate' rather than being expressed as a minimum.</p> <p>See Matter Statement 6, with regard to gypsy and travellers.</p>
<p>Do these capacity figures concur with the indicative density figures provided at paragraph 7.2 (supporting text) to policy S11? If not why not?</p>	<p>Policy S11 identifies that 'efficient use of land' for sites which are located near public transport hubs beyond Epsom Town Centre in density terms would be a minimum of 60dph and for sites 'in other urban areas' this would be a minimum of 40dph.</p> <p>Please refer to the Commissioners' Matter 4 Statement (question 5.5) which explains the accessibility and sustainability benefits of this site. The masterplan indicates an average density of 33dph based on a capacity of circa 1,250 dwellings at this 37.9 Ha site. However, this reflects the 7Ha of open space that is to be provided within the allocation, alongside the other infrastructure requirements at SA35, and is focused on achieving a high quality, responsive design. Should the areas of open space be removed from the calculation, the development plots are estimated to exceed 60dph. This exceeds the prevailing surrounding density which averages 15–30dph.</p>
<p>In terms of the identified uses and policy considerations, are these based on sound evidence?</p>	<p>SA35 includes provision for C3 residential, specialist housing, community uses, commercial/incubator floorspace. The uses have been informed by the Council's HEDNA (2023, HB03). The proposed capacity of approximately 1,250 homes will make a considerable contribution to the Council's need for homes across the plan period. The Commissioners considers this evidence to be sound. To make the Plan effective, the Commissioners welcomes the current flexibility in policy in terms of residential capacity so that should need/evidence change at the point of planning submission then an application can respond to that.</p> <p>In terms of specialist housing, SA35 includes a requirement for a proportion of specialist housing to be delivered. The HEDNA identifies an oversupply of market extra care units and identifies a need for affordable beds.</p>

Inspector's question	Response
	Therefore, the inclusion of specialist housing within SA35 should be based on evidenced local need at the time of a planning application. On self-build plots, SA35 seeks 5% of total homes as serviced plots or custom build housing on sites proposing 100 dwellings or more however the HEDNA identifies the demand for self/custom build to be low. The Commissioners therefore do not consider the policy requirement to be justified and, at the very least, the marketing period should be set at no more than a year for plots with outline planning permission.
Where necessary, do the site allocations refer to any heritage considerations which would need to be taken into account as set out within document TP06?	SA35 part i seeks to conserve and, where possible, enhance the setting of Grade II listed Horton Farmhouse. The Commissioners considers SA35 adequately addresses heritage considerations which should be taken into account at the planning application stage. The current masterplan has been informed by heritage considerations and potential impact and accommodates the site's heritage assets.

## Site SA35 Horton Farm

### **Question 13.3 Is the Plan clear regarding what infrastructure would be necessary to support this allocation?**

- 1.2 Yes, broadly, the Commissioners considers the Plan to be clear regarding the infrastructure requirements to support SA35 and agree they are justified. Estimated infrastructure costs have been mirrored within the IDP and the Commissioners' viability assessment for the masterplan. The Commissioners and Savills have further undertaken a range of sensitivity testing within the viability assessment to understand the impact of increasing/decreasing costs/values would have and are confident the site remains viable in a broad range of scenarios.
- 1.3 Notwithstanding this, to ensure it is effective, the IDP should be further progressed by the Council to ensure all line items are fully costed, and the timing of delivery for each item is known and understood. Further, the IDP should provide additional detail as to which site allocations are expected to fund individual items within the IDP. These further works can be completed in-parallel with the Local Plan adoption process.

### **Question 13.4 In what way does the site take into account the sustainability goals of the Council as identified within the Vision, pages 15 and 16 of the Plan.**

- 1.4 Table 2 includes the Commissioners' position as to how the Horton Farm site takes into account the sustainability goals (where relevant), within the Local Plan Vision.

Table 1 The Commissioners' response to Sustainability Goals (Vision, p15/16), in relation to SA35

Vision	Response
<i>"Epsom and Ewell will continue to provide a high quality of life and be an attractive place to live, work, study and visit..."</i>	<p>The Commissioners' project master planners, ADAM Architecture, have prepared a Vision Document for Horton Farm – this was submitted alongside the Regulation 19 representations. A core masterplan principle focuses on building a diverse and adaptable community through improvements to social infrastructure and delivery of housing that is diverse in its type and tenure. The masterplan is in-keeping with the character of the nearby conservation areas and seeks to re-purpose the existing, listed Horton Farmhouse.</p> <p>The site will therefore deliver an attractive place for new residents to live and work and seeks to support the continued function of Epsom Town Centre and other key local attractions, through the delivery of a new community.</p>
<i>"New development will have delivered a range of new homes of varying sizes, meeting the needs of our changing population including those in specialist housing need, and from students through to older people."</i>	<p>In support of the vision, the site will deliver approximately 1,250 new homes with a mix, size and tenure including significant affordable, family and adaptable homes. The masterplan has been informed by the Council's HEDNA (2023 HB03) and will include a significant proportion of much needed family sized-affordable homes. The quantum of homes proposed at Horton Farm will be important in assisting the Council with meeting as much of its housing need as possible, in accordance with paragraph 60 of the NPPF(2023).</p> <p>SA35 also includes a requirement to deliver a proportion of specialist housing as necessary at the time of an application. Please see Matter 6 Statement.</p>
<i>"New development will have been focused on urban sites, with the role of Epsom Town Centre of paramount importance having seen the most exciting and significant opportunities for growth"</i>	<p>Paragraphs 123 and 146 of the NPPF(2023) prioritise a brownfield-first approach to accommodating needs. However, it is also clear that Green Belt boundaries can be reviewed where exceptional circumstances are fully evidenced and justified, in which case changes should be made through the plan-making process (145). The Council's Spatial Strategy Topic Paper 2025 (TP07), assesses the brownfield land in the borough and identifies an insufficient supply to meet housing needs. It also confirms that there are exceptional circumstances for the release of Green Belt, including Horton Farm.</p>

Vision	Response
	The Commissioners fully agree with the Council's conclusion that exceptional circumstances exist to justify the release of Green Belt land in the Borough. Therefore, Green Belt sites, such as Horton Farm, will play a significant role in meeting housing need, alongside the identified urban sites mentioned in the Vision.
<i>"New vibrant communities with their own identities will be centred around previously underdeveloped transport hubs and principal movement corridors"</i>	Please refer to the Commissioners' response to Matter 4, question 5.5, which sets out the accessibility and sustainability credentials of the Site in detail, as well as the Vision Document. In sum, aligned to the Vision, the site is considered to be highly accessible to the local bus network, which has good links to the nearby train stations. The train stations are also easily accessible by cycle (10 minutes). Proximity to the stations would be further enhanced through improvements to footways and pedestrian crossings, which would be provided as part of a future planning application. Additionally, there is an opportunity for route E9 to be diverted into the site.
<i>"The economy will be thriving...performing to its full economic potential, attracting new, and supporting existing businesses, from start-ups to larger companies"</i>	SA35 includes delivery of business incubation floorspace. The delivery of approximately 1,250 new homes would also result in increased local expenditure and economic activity within the town centre. The site would support the Borough's economy to perform at its full potential.
<i>"Epsom Town Centre will have remained the principal urban centre in the borough and new development will have reflected and enhanced its urban qualities... There will be more people living in the centre helping to support it as a prosperous market town, whilst supporting the existing shops, leisure cultural uses, public transport services and community facilities that are so valued by existing residents."</i>	As above, the Commissioners' proposals for Horton Farm seek to improve and enhance connectivity to Epsom Town Centre. The site benefits from strong existing connections to the town centre via road (Christ Church Road), bus (E5 and E9 services) and by cycle; and, the masterplan presents opportunities to enhance connectivity to the town centre including through a diversion of the E9 bus route into the site and improvements to cycle and pedestrian infrastructure in and around the site.
<i>"New development here will have secured investment in wider public realm improvements, providing more trees to help to cool streets in the summer and provide a more attractive place and new habitat for birds and other wildlife. It will be a place where people naturally choose to walk and cycle to and around, because"</i>	Part e of SA35 requires provision of a new public park of c.7 hectares, including walking, cycling routes and equestrian routes. Part k seeks to ensure the site layout retains and protects veteran trees and maximises retention and safeguarding of other existing mature trees. Finally part i will ensure the site achieves a minimum of 10% BNG (see Matter 8).

Vision	Response
<i>the surrounding environment is even more pleasant"</i>	
<i>"Development across the borough will have been supported by improvements in community and transport infrastructure, with active travel networks having been a core part of growth in the borough ..."</i>	<p>As set out above, and in the Matter 4 Statement (question 5.5), Horton Farm will bring forward a range of strategic infrastructure improvements including transport works and a new community building alongside delivery of primary care facilities, subject to local need.</p> <p>Improvements to the surrounding walking and cycling network will be provided which will provide an opportunity to improve active travel connections between the site and key local destinations and services (including public transport). This could comprise contributing towards LCWIP schemes as well as improving connections between the site and the corridors identified within the LCWIP to provide a continuous high-quality walking and cycling network between the site and Ewell Village/ Epsom High Street. There is the opportunity to enhance permeability through the site, via the provision of active travel connections for existing residents in the west of the Borough, to the Town Centre.</p>
<i>"...its network of green spaces that are embedded within communities will have been strengthened by development. With new public open spaces as well as enhancements to the borough's existing streets and green spaces, improvements in habitats for wildlife, and provision of better links between existing green and blue infrastructure, amenity for both new and existing residents will be secured"</i>	<p>Parts e, k and f of the SA35 site allocation include to: deliver a new public park/ open space of approximately 7ha; incorporate recreational opportunities within green and blue infrastructure and opportunities for play; ensure protection of veteran trees; and, maximise the safeguarding of other existing mature trees and hedgerows. As per the Vision Document, a landscape-led design is proposed by CCE to ensure that the Site's proximity to Horton Country Park and its landscape context is respected. A minimum 10% BNG will also be provided (see Matter 8).</p>
<i>"Growth will be different from what it has been before. There will be a greater emphasis on design and built quality, the delivery of environmentally sustainable homes, communities for families and new residents who want to contribute positively to Epsom and Ewell's unique character..."</i>	<p>A high quality landscape-led design is proposed by The Commissioners to ensure that the Site's proximity to Horton Country Park, Horton Farmhouse and its landscape context is respected. The scheme will deliver approximately 1,250, high quality, energy efficient homes to promote low-carbon lifestyle, including family homes. High quality placemaking including opportunities for social value will be achieved.</p>
<i>"The borough's identity will have been strengthened, with the existing character</i>	<p>The Commissioners' masterplan responds to and reinforces local distinctiveness patterns of development, landscape and culture whilst</p>

Vision	Response
<i>of places in the borough having played an important role in shaping development proposals in terms of building materials, proposed built form, retention of important views and vistas and improvements to the public realm."</i>	generating a unique sense of place. A key design principle is ensuring the scale and mass of the built form makes the best use of the land, whilst also respecting surrounding residential character.

**Question 13.5 - The representation on behalf of The Church Commissioners for England (representation 155) refers to the preparation of the Statement of Common Ground with the Council in relation to the deliverability of this site. The Inspector would be grateful if this could be prepared and submitted with the MIQ responses. This should look to cover, but not limited to, site capacity, including reference to the affordable housing and gypsy and traveller provision, any known constraints, infrastructure requirements, ecology and flood risk, phasing, whether the requirements of policy S15 to achieve 20% biodiversity net gain is achievable as well as a clear indication of the likely land uses envisaged here.**

1.5 SCG13 identifies where there is agreement between the parties (Sections 1–3) and where agreement has not yet been reached (Section 4/Appendix 2). These areas of non-agreement are focused on discrete parts of the Plan. These relate to the Commissioners’ suggested changes to the proposed submission plan policies, to ensure they are Sound:

**1 SA35 (Horton Farm)**

- i to part d (primary care) and part g (gypsy and traveller pitches) - to ensure the policy is fully justified, the requirement should be based on evidenced local need.
- ii to ensure the plan is justified and aligned with national requirements, the minimum BNG should be 10%. Refer to Matter 8 Statement.

**2 S7 (Specialist Housing)-** to ensure the policy is fully justified, the requirements should be based on evidenced local need. Refer to Matter Statement 6.

**3 S8 (Gypsies Travellers and Travelling Show people)-** to ensure the plan is unambiguous and consistent throughout and consistent with national policy the requirements should not be expressed as a minimum. See Matter 6 Statement.

**4 S12 (Amenity Protection)-** to ensure the policy is consistent with national policy and effective, it should not be overly restrictive and include reference to ‘acceptable’ amenities.

**5 S15 (Biodiversity Net Gain) -** the requirement to achieve 20% BNG on greenfield allocations, including Horton Farm, is not supported and is not consistent with national policy/guidance. The Commissioners is content for the requirements to deliver anything above the mandatory 10% to be reframed as an ‘aim’ to maintain sufficient

flexibility and account for site-specific challenges and characteristics. Refer to Matter 8 Statement.

- 6 **S16 (Flood Risk and Sustainable Drainage)**- to confirm the sequential test will not be required where a site-specific flood risk assessment demonstrates that no built development within the site boundary or access would be located on an area at risk of flooding.
- 7 **S17 (Infrastructure Delivery)** - to clarify that infrastructure for larger developments may need to be phased and agreed on a site-by-site basis to ensure the policy is effective and aligned with National Policy. See Matter 5 statement.

**Question 13.7 - Should the policy wording make reference to ordinary watercourses?**

- 1.6 The Commissioners' Flood Risk /Drainage consultant, Pell Frischmann, has advised that any modification to existing ditches/watercourse on site would need to be approved as part of any ordinary water consenting process with the LPA. Reference to this within the policy would not add any weight, given it would be covered by existing legislation. Discussions on this topic would be held with the Council at the planning application stage and management of existing runoff from the development would form a critical part of any drainage strategy. Therefore, the Commissioners does not consider it necessary to make reference to ordinary watercourses within SA35.

Word Count – 2,969