



Finachem House - 2-4 Ashley Road

**Epsom and Ewell Local Plan Examination
Stage 2 Hearing Statement
Matter 3: Vision and the Spatial Strategy**

Andrew Black Consulting on behalf of Gavil Group

September 2025

Project	Finachem House
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Local Authority	Epsom and Ewell Borough Council
Client	Gavil Group

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1. Introduction

1.1 This matters statement has been prepared by Andrew Black Consulting on behalf of Gavil Group in relation to their interest in the land at Finachem House, 2-4 Ashley Road, Epsom. The land is allocated in the local plan under policy SA11.

1.2 These representations are made in the context of the tests of soundness as set out in paragraph 36 of the current National Planning Policy Framework (NPPF). This states that plans are ‘sound’ if they are:

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.

1.3 Finachem House is located within Epsom Town Centre and is allocated for development of approximately 20 dwellings under policy SA11 of the local plan.



Figure 1 – Site Area

1.4 The allocation of the site, follows previous pre-application with the council on the potential redevelopment of the site. Whilst the allocation of the site is welcomed, the allocation for 20 dwellings is not reflective of the true development potential of the site or reflective of the aspirations presented to the council during the pre-application discussions. It is recognised

that any capacity in the plan is indicative and does not represent a maximum capacity. Nevertheless, the low indicative capacity of this site would not represent a viable, realistic or developable amount of housing. More importantly the approach taken to the development potential of this site is indicative of wider issues with the plan, particular in reference to the approach taken to urban capacity.

- 1.5 These representations set out comments in relation to key matters of soundness for stage 2 of the hearings in relation to Matter 2: Housing Need and Supply. Issue 3 of the MIQs is whether the *plans approach to the vision and spatial strategy justified, positively prepared and consistent with national policy*

2. Matter 3: Vision and the Spatial Strategy

2.1 They key questions raised by the inspector which benefit from a response are set out below with comments set out against each in turn.

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

2.2 This is a matter for the council to respond on.

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

2.3 This is a matter for the council to respond on.

4.3) Does the key diagram on page 24 of the Plan represent the key diagram as required by paragraph 23 of the Framework?

2.4 It is considered that the diagram does show broad locations for development and is accordance with paragraph 23 of the framework.

4.4) 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?

2.5 This is a matter for the council to respond on.

4.5) 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.

2.6 Paragraph 3.20 of the plan states that development will be directed to the most sustainable locations *making best use of previously developed land*. Further representations on how the council has maximised previously developed land are set out within this matters statement and others. It goes on to state that *in sequential order these locations and further detail on their role in the spatial strategy is shown in figure 3.1*. However, there is no figure 3.1 in the plan so this is unclear.

2.7 Paragraph 3.21 of the supporting text for the plan recognises that the allocations and preferred locations for development will not deliver adequate housing to meet the established housing need in the borough. On this basis it is not considered that the plan presents an appropriate spatial strategy.

4.6) 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?

- 2.8 In relation to housing needs, document TP07 sets out a specific requirement for 573 student homes over the plan period. The previous submissions, including pre-application meetings, at Finachem have been for a specific purpose built student accommodation block and this was supported by the University of Creative Arts.
- 2.9 Despite the policy in relation to Student Accommodation within the plan, none of the proposed allocations have any reference to the provision of student accommodation and it is considered that the spatial strategy for the plan is defective in this aspect alone.

4.7) 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?

- 2.10 Paragraph 60 of framework is clear that the objective of the government is to significantly boost the supply of housing. The council is highly reliant on development from brownfield sites within Epsom Town Centre.
- 2.11 Regard should also be had to paragraph 123 of the framework which states:
- Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.*
- 2.12 It is unclear how the strategic policies in the plan or the overall spatial strategy sets a clear strategy for using as much PDL land as possible.
- 2.13 Paragraph 124 of the framework goes on to set out a number of recommendations for planning policies in relation to making effective use of land. It remains unclear as to how the spatial strategy corresponds with these policies.
- 2.14 It is therefore unclear on how the plan is consistent with national policies in this regard.

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

- 2.15 Paragraph 63 of the framework sets out that the *need, size, type and tenure* of housing needed for different groups in the community should be reflected in planning policies. Paragraph 63 then lists the groups which policy should reflect, and this includes students.
- 2.16 In relation to student housing, the Housing Topic Paper (TP03) sets out the following in relation to student accommodation at paragraph 6.11:

The borough's higher education providers which have expansion plans are expected to generate additional need for purpose-built student accommodation to increase over the Local Plan period. The University for the Creative Arts currently have approximately 1,700 students at the Epsom Campus although there is currently capacity to increase the number of students to approximately 2,000 students, the level of growth is less than what was envisaged at the time the HEDNA was produced.

- 2.17 This is also reflected in the supporting text of policy S7.
- 2.18 It is accepted that the level of growth of students for the UCA may be at a lower level than originally envisaged in the HEDNA, however it is clear that growth will still occur and without further student accommodation being provided then these students will likely seek accommodation in standard family housing, HMOs or out of borough. It is notable that none of the allocations within the plan seek a provision of student accommodation. Despite the clear intention of the client to redevelop the Finachem House site for student accommodation, this has not been reflected in the wording of the policy.
- 2.19 It is therefore not considered that the plan is positively prepared or effective in this regard.

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