

**EPSOM & EWELL LOCAL
PLAN EXAMINATION IN
PUBLIC:
WRITTEN STATEMENT OF
BEHALF OF EPSOM
COLLEGE**

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1.0 Introduction

1.1 Context

Following our response to the Epsom & Ewell Proposed Submission Local Plan (Reg 19) Consultation in January 2025, the following Written Statement (on behalf of Epsom College) is made in relation to the questions raised by the Inspector in their Matters, Issues and Questions (MIQ's) for Stage 1 & 2 Hearings. Comments from our previous consultation responses still stand.

1.1.1 This statement contains responses to:

- Matter 4: Green belt (Issue 5)
- Matter 7: The Built Environment (Issue 9)

1.1.2 As stated in our response to the Programme Officer, Epsom College (represented by Bidwells LLP) has formally registered its interest to appear and be heard at Stage 2 Hearing Sessions in line with the published programme.

1.1.3 The College's previous representation comments on the Regulation 19 version of the Plan highlighted our observations at a strategic level before identifying specific policy issues. We are pleased to see that the Inspector has queried some of the LPA's methodologies for assessing Green Belt release and we provide further written evidence in the following statement clarifying and expanding upon the case for release at Epsom College.

2.0 Response to MIQ Matter 4: Green Belt

2.1 ***"Issue 5: Is the Plans approach to the Green Belt justified and consistent with national policy?"***

2.2 **Has the Council applied the criteria in a consistent manner?**

2.2.1 *"5.8 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?"*

2.3 **Epsom College's Response to 5.8**

2.3.1 On behalf of Epsom College, we first wish to raise concern with the inconsistent conclusions reached in the Green Belt assessments within the November 2024 Green Belt Study Update and the December 2024 Green Belt Exceptional Circumstances Topic Paper.

2.3.2 The November 2024 Study appraises the boundary of the College campus as whole and concludes that it scores low against all Green Belt purposes. The appraisal concludes with the

recommendation that “there is a case for retaining the site in the Green Belt because of the layout makes it difficult to inset the built-up part from the open part. Alternatively, they would have to consider insetting the whole site” (Page 26).

- 2.3.3 The recommendation not to inset the College from the Green Belt in the November 2024 Paper is contrary to the recommendations in respect of the same assessed parcel of land in the more recent December 2024 Green Belt Topic Paper. The concluding statement in the Dec 2024 paper states *“having weighed up the issues outlined above, it is considered that **the major developed site does not exhibit an open character that makes an important contribution to the Green Belt and should therefore be excluded from the Green Belt boundary**”* (Page 80) (our emphasis in bold). Presumably the December 2024 Paper would follow on from the November 2024 Study and therefore it is unclear why the Council appears to have applied the recommendations of the earlier November study in deciding not to inset Parcel 36.
- 2.3.4 Furthermore, there appears to be inconsistency between the recommendations in respect of insetting and the scoring system used to assess site contributions toward Green Belt purposes. For example, land at Epsom College (Parcel ID P36) is appraised as having a low contribution to Green Belt purposes, with the site assigned an overall score of 4 (see Table 1 below). However, we observe that other sites appraised with considerably higher scores i.e., with a greater contribution towards Green Belt purposes, but have been proposed to be inset from the Green Belt. For example, another education institution, NESCOL College (LAA ref: NON041), is proposed to be inset, but is assigned a higher overall score of 5 (parcel ID 42 – land at and associated with NESCOL College) and 8 (parcel ID P43 – land to the east of NESCOL College).

Table 1 – Site 36_001 assessment (parcel ID P36) in the 2024 Green Belt Study Update

PARCEL ID	PURPOSE SCORE 1	PURPOSE SCORE 2	PURPOSE SCORE 3	OVERALL SCORE
P36	1	2	1	4

- 2.3.5 In our view, Site 36 has good defensible boundaries, defined by the existing buildings along the east and west boundaries and buildings and landscape along the southern edge. While there are more open parts of the site by the sports pitches these are screened by existing features which are readily recognisable and likely to be permanent. Indeed, this is supported by the December 2024 Topic Paper which notes *“the site is defined by clear physical features following the property line of the campus”* (Page 77).
- 2.3.6 While we agree with the conclusion of the Topic Paper that the site has strong defensible boundaries, we disagree with the November 2024 study where it states that it would be *“difficult to inset only the built-up parts of the site. The buildings are concentrated on the edge with open areas located centrally”* (Table 5 – summary of section 2 assessment, page 44). Having identified that the site is defined by clear physical features and that it does not greatly contribute to Green Belt purposes, it is unclear why it is necessary to maintain the Green Belt designation. Furthermore, the sports pitches form a key part of the College Campus and there will be a continued requirement to meet this need on site.
- 2.3.7 In the long term, Epsom College only wishes to develop its estate for futureproofing purposes and proportionate to its modest growth strategy. Removal from the Green Belt will also increase

the likelihood of the College being able to develop facilities that will also have a community use value (for example, use of indoor sports facilities and auditoriums). This will always remain in line with the existing constraints on its site, including heritage and conservation assets, ensuring that it will always need to consider the wider landscape and townscape context in its proposals.

2.3.8 Paragraph [85] of the NPPF is clear that “when defining Green Belt boundaries, plans should: b) not include land which it is unnecessary to keep permanently open”. In Green Belt terms therefore, inseting the site from the Green Belt is fully justified.

2.3.9 In summary, our view is that Epsom College's campus does not make an important contribution to the openness of the Green Belt and has clear, defensible boundaries that could readily define a revised boundary. The Council's decision not to inset Parcel 36 in its submission Local Plan is inconsistent with both the scoring methodology and the recommendations of the December 2024 Topic Paper creating a contradictory and unjustifiable position that should be urgently reviewed.

2.4 Should the land at Epsom College be allocated to reflect the potential for enhanced education facilities at the site?

2.4.1 *“5.10 In light of the representations made by Epsom College, should the land be allocated to reflect the potential for enhanced education facilities at the site? The Council have stated that the site has been assessed as part of the LAA. Please could the Council provide the page/paragraph references for this?”*

2.5 Epsom College's Response to 5.10

2.5.1 Following an audit, we understand that land at Epsom College has not been assessed as part of the Council's LAA. If the site has been assessed, we would also be grateful to receive the page/paragraph references for this.

2.5.2 On the matter of site allocation, we maintain that the land should be allocated to reflect the potential for enhanced educational facilities at the site. We do not repeat our previous representations here; however, we do wish to highlight that the future development requirements for Epsom College cannot be delivered efficiently without the necessary removal of land from the Green Belt. While a positively framed education policy would provide helpful reinforcement, the overriding requirement is the release of Green Belt land to secure the College's long-term educational provision.

2.5.3 To reiterate, The College would welcome a requirement to set out a comprehensive plan for the allocation in the form of a concept masterplan should the Inspector and/or Local Planning Authority consider this to be helpful.

2.6 Policy DM15 Green Belt: Is the policy justified?

2.6.1 *“5.13 Is the policy justified? In particular, is the reference to the National Planning Policy Framework correct and are the Council clear about which Framework they are intending to refer to here?”*

2.7 Epsom College's Response to 5.13 and 5.14

- 2.7.1 We wish to raise concern that Policy DM15 as presently drafted is not justified.
- 2.7.2 As noted above, we would support the recognition of land at Epsom College as an inseting anomaly. However, there is currently no clear policy hook to explain how existing developed sites within the Green Belt are treated as displayed on the Local Plan Policies Map.
- 2.7.3 As noted in our previous submissions, the adopted Local Plan includes a policy for Major Developed Sites. The College is designated as a 'major developed site' ('MDS') within the Green Belt under adopted policy DM2: 'Infilling within the Major Developed Sites'. Policy DM2 establishes clear criteria for the types of development permitted within MDS's.
- 2.7.4 Emerging Policy DM15 as drafted simply repeats the broad tests in the Framework and lacks specific policy tests. A similar policy hook should apply as to adopted Policy DM2 to recognise Major Developed Sites within the Green Belt where growth can be accommodated without harming Green Belt purposes.
- 2.7.5 Without clear continued support in the new Local Plan, educational establishments such as Epsom College which make an important economic, social and environmental contribution to the Borough may otherwise be stifled by restrictive Green Belt policy that does not recognise the land's varied characteristics and capacity to accommodate enhanced educational development without harming the Green Belt.
- 2.7.6 In summary, we object to Policy DM15 due to its lack of clear justification, offering no specific framework for recognising existing developed sites within the Green Belt. Unlike the adopted Policy DM2, which identifies Major Developed Sites (MDS) and sets out clear development criteria, DM15 merely repeats broad national policy, but without referring to specific policy tests.
- 2.7.7 By failing to recognise that major developed education sites such as Epsom College have capacity to accommodate additional growth without harming Green Belt purposes, the emerging policy is not, in our view, positively prepared..
- 2.7.8 ***"5.14 What does the wording of the policy add over and beyond the wording of the Framework. Is the policy justified?"***
- 2.7.9 The policy repeats the Framework tests and does not introduce any wording above and beyond this. Please refer to our comments above on this matter.

3.0 Matter 7: The Built Environment

3.1 Issue 9: Built Environment Policies

- 3.1.1 *“Are the Plans policies in relation to the built environment positively prepared, justified, effective and consistent with national policy?”*

3.2 Policy DM21 Education Infrastructure

- 3.2.1 *“9.7 Should this policy and/or the supporting text include a reference to student accommodation as a supporting facility? If not, why not?”*

3.3 Epsom College's Response to 9.7

- 3.3.1 Our initial response to Policy DM21 expands on the need for additional positive wording to support education institutions. However, to avoid repeating previous statements and to ensure on-topic responses are made to the MIQ's, we are clear that the policy as presently drafted does not plan for the housing needs of specific groups, especially with regard to student residential institutions. There is a clear need for purpose-built student residential facilities within Epsom and Ewell Borough to support the area's established and expanding educational institutions and its need to retain boarding as an option for students. Overall, well-planned student accommodation reduces pressure on the local housing market, helps attract and retain talented students, and supports the borough's reputation as a centre of academic excellence. To an extent, this has been covered by Policy S7.
- 3.3.2 However, in the case of schools which also act as residential institutions, staff accommodation is equally important as student housing. In the context of Epsom College, it is essential for staff to live on site to safeguard boarding pupils. Policy S7 would not naturally provide supporting wording for these institutions and hence we feel it should be incorporated into DM21.
- 3.3.3 By providing high-quality, sustainable staff and student housing on or immediately adjacent to campuses and estates, the borough can promote a vibrant, inclusive community while minimising commuting impacts and encouraging active travel, thereby aligning with wider housing, education, and sustainability objectives. However, for student residential institutions that include boarding, we have concerns that the policy would not offer express support for on-site accommodation.
- 3.3.4 The PPG provides further detail on assessing need for student housing and requires that *“Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Encouraging more dedicated student accommodation may provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock”*.
- 3.3.5 Epsom College has experienced a particular shortage of staff and pupil accommodation following significant growth in pupil and staff numbers in recent years. Epsom prides itself on delivering the highest standards of pastoral care. The close-knit House system is crucial to day-to-day life at the College, forming a home away from home for all pupils. While approximately 60% of Epsom's

staff reside on or close to the Campus, the creation of a new residential zone would help to accommodate the need for additional residences close to the Campus, whilst releasing much needed capacity on the existing grounds to deliver new and enhanced educational facilities.

- 3.3.6 Policy DM21 should explicitly reference the provision of student and staff residential institutions to address a clear need in Epsom and Ewell. Purpose-built student housing is understandably covered in Policy S7 but would usually refer to sui generis facilities. Epsom College’s recent expansion highlights the urgent requirement for additional boarding and staff accommodation to maintain its high standards of pastoral care. The combination of positively worded policies above will provide comfort to similar institutions that there is support for developing on-site and close-to site boarding and student residential facilities. This positive wording could be included in DM21 or specifically referenced S7 if the Inspector concludes that it would be better suited.

4.0 Concluding Statement

- 4.1.1 In conclusion the Council’s approach to Green Belt boundaries is not robustly justified and in respect of recommendations for Epsom College, there are various conflicts and inconsistencies in the assessment methodology. Both the November and December 2024 Green Belt studies confirm that Epsom College’s campus makes a negligible contribution to Green Belt purposes, benefits from clear and defensible boundaries, and could readily be inset without harm.
- 4.1.2 In respect of education policies, to ensure the Plan is positively prepared the supporting text to Policy DM21 should engage with the need to improve a wider range of supporting facilities, including student accommodation, across the plan period. The case for improved facilities at Epsom College including staff accommodation has been made in our earlier representations.
- 4.1.3 In addition, the omission of a clear Green Belt policy framework for Major Developed Sites creates a restrictive policy environment which fails to recognise the varied nature of Green Belt.

