

Epsom & Ewell Local Plan 2022-2040 – Examination  
in Public

# Hearing Statement: Matter 3 – Vision and the Spatial Strategy

September 2025

savills

## Contents

1.	Introduction/Background .....	2
2.	Response to the Inspectors Questions .....	3
	Stage 2, Matter 3: Vision and Spatial Strategy.....	3
3.	Conclusion.....	6
	Contact .....	7

## Document History

Issue	Date	Issued by	Comment
1.0	08/09/2025	AW/GW	
2.0	09/09/2025	AW/GW	
3.0	09/09/2025	AW/GW	Final Version

# 1. Introduction/Background

- 1.1 This hearing statement has been prepared by Savills on behalf of Atkins Properties Ltd, in relation to the Epsom & Ewell Local Plan 2022–2040. It responds to the Inspector’s Stage 2, Matter 3 questions concerning Vision and the Spatial Strategy.
- 1.2 Atkins Properties is promoting Land at Downs Road, Epsom (site reference COL023) for residential development. The land comprises four parcels: the northern field, which is proposed for up to 160 homes, and three additional parcels (references COL020, COL021 and WOO019) which are promoted for Green Infrastructure and biodiversity enhancement.
- 1.3 This representation raises fundamental concerns regarding the approach to the Plan Vision and Spatial Strategy. In particular:
- The distribution of growth is unbalanced, with the south and east of the Borough excluded despite the presence of sustainable, available sites;
  - Certain sites have been mischaracterised, leading to flawed assumptions about landscape and environmental effects;
  - The scale of housing proposed is insufficient to meet the Borough’s identified needs or deliver the range of housing types required;
  - A plan that, upon adoption, will immediately need to demonstrate an additional 20% supply buffer cannot be considered positively prepared.
- 1.4 These issues undermine the robustness of the strategy and its ability to respond to acute housing pressures.
- 1.5 This statement provides a response to Inspector’s questions 4.5, 4.6 & 4.7, and draws on the Regulation 19 representations submitted on behalf of Atkins Properties in February 2025.

## 2. Response to the Inspectors Questions

### Stage 2, Matter 3: Vision and Spatial Strategy

**Q 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?**

- 2.1 The Plan does not present an appropriate spatial strategy. The flaws in the evidence base and the unwillingness of EEBC to thoroughly explore all avenues to meet the acknowledged housing need undermine any attempt to deliver a suitable spatial strategy.
- 2.2 The Plan's vision and spatial strategy direct growth almost exclusively to the north and west of the Borough. Scenarios 4 and 5, around which the Plan has been developed, exclude development in the south and east, notwithstanding sustainable and available opportunities such as Downs Road. This creates an unbalanced approach which cannot be justified.
- 2.3 The Sustainability Appraisal itself acknowledges a “missing scenario” whereby Downs Road is combined with Horton Farm. Such an option would have performed better on landscape grounds than the chosen scenarios. Its omission confirms that not all reasonable alternatives have been assessed.
- 2.4 At the Elmbridge examination, a strategy focused almost exclusively on brownfield and town centre capacity was judged to be inadequate, as urban allocations there provided only around 15% of housing need. A similar risk arises here: reliance on intensification while excluding sustainable edge-of-settlement sites such as Downs Road leaves the Plan unable to meet identified needs.
- 2.5 Transport evidence is also incomplete. At Regulation 19 stage, Surrey County Council's strategic transport model had not been finalised. Assumptions about bus service uplifts on the E9/E10 corridors remain uncommitted, and LCWIP schemes face unresolved compliance and deliverability issues. These weaknesses undermine confidence in the chosen distribution of growth.
- 2.6 The evidence presented has also misrepresented sites that could come forward. The SA refers to potential landscape impacts and coalescence concerns in relation to sites in the south and east. However, these concerns are unfounded in relation to site COL23 (Downs Road). Figure 6.4 of the Green Belt Study Update assigns a blanket “red” landscape sensitivity score to the entire so-called “southern cluster”, which includes COL020, COL021 and WOO019. This is a flawed conclusion: these three parcels have never been promoted for built development, but rather as part of a landscape and biodiversity enhancement strategy. They form part of the wider Downs Road site but were expressly submitted for non-developable uses.
- 2.7 The conclusions drawn by the SA, supported by the Green Belt Study Update, rest on a mischaracterisation of what is actually proposed. Site COL023 was promoted only for development on the northern field, with COL020, COL021 and WOO019 expressly submitted for biodiversity and open space uses. By treating all four parcels as if they were developable, the assessment has overstated harm and dismissed a balanced option. Properly understood, the Downs Road strategy would deliver both housing and a significant landscape buffer, supported by biodiversity gains. Moreover, topographically, the land rises southward from the settlement edge, so any development confined to the northern field would sit discreetly in the landscape. This undermines the landscape harm attributed to this area and calls into question the SA's rationale for excluding the south from the spatial strategy. With the clear mischaracterisation in the evidence base, the spatial strategy that

is proposed does not have sufficient support from what are fundamentally flawed evidence documents.

- 2.8 Notwithstanding the position regarding the evidence base, the clear and present housing need justifies the release of further Green Belt land than is currently proposed. There is a readily identifiable current need for all types of housing, and this is becoming ever more acute.

***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?***

- 2.9 While the proposed strategy may enable some needs to be addressed, it falls far short of delivering the scale and mix of housing required. With the latest Housing Delivery Test metric (2023 result, published December 2024) identifies Epsom & Ewell delivering only 38% of the requirement, a strategy that plans for less than half of identified need cannot provide the range of housing identified in TP07, including affordable, family and specialist accommodation. Inclusion of sites such as Downs Road would enable the Plan to deliver a broader mix and quantum of homes.

- 2.10 The spatial strategy should be revised to include the delivery of a greater quantum of sites, and a greater quantum of sites located in the Green Belt. Inclusion of sites such as COL023 will allow for a greater level of housing delivery, which will in turn allow EEBC to deliver a greater range of housing that meets identified needs.

**Q 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 Government's 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?**

- 2.11 The proposed strategy does not meet the Government's objective of significantly boosting housing supply. Delivering only 46% of capped need and 35% of uncapped need, the Plan cannot be said to provide a sufficient amount of housing allocations or a variety of land.
- 2.12 The proposed strategy fails to deliver even half of the identified LHN. The minimum Local Housing Need (LHN) is derived from the Standard Method, which the Sustainability Appraisal identifies as 10,242 dwellings (569 per annum) over the plan period, or 13,248 dwellings (736 per annum) without the application of the cap. The Plan submitted for examination is based on a housing delivery of 4,700 dwellings across the plan period (equivalent to 273 per annum). The Council is therefore proposing to deliver only 46% of the capped LHN and around 35% of the uncapped figure.
- 2.13 Notwithstanding that the Plan is being assessed under the 2023 NPPF, it is relevant to consider the 2024 NPPF, in the context of significantly boosting the supply of homes, and in particular paragraph 78.
- 2.14 Paragraph 78 of the 2024 NPPF identifies the need for Local Authorities to identify a five year housing land supply in the context of their adopted strategic policies, and identifies instances where additional increase to this buffer should be provided. Subsection (c) of paragraph 78 identifies that:
- "From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework, and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance."*
- 2.15 As this Plan is being examined under a previous version of the framework, this plan would be subject to the provision set out in paragraph 78(c) once it is adopted. The application of the Standard Method for Epsom and Ewell currently sets out a figure identifying a need of 889 dwellings per annum. 80% of that figure would be approximately 712 dwellings per annum. Therefore the Plan would, almost immediately upon adoption, be required to demonstrate what is effectively a six-year supply (five years plus the 20% buffer under NPPF 2024 paragraph 78(c)). A Plan which is going to be captured by this requirement is not positively prepared. Rather than boosting supply, it risks leaving the Borough exposed to speculative development almost immediately.

## 3. Conclusion

- 3.1 The spatial strategy is unjustified, unbalanced, and ineffective. It excludes the south and east of the Borough, mischaracterises Downs Road, and relies on incomplete transport evidence. Most importantly, it fails to provide sufficient land to meet housing needs. A plan that will, on adoption, require an additional 20% buffer is not consistent with national policy and cannot be considered sound.
- 3.2 The potential adoption of a plan that will almost immediately be required to consider what is in effect whether it can demonstrate a 6-year housing land supply (5 years plus the 20% buffer) when considering applications cannot be assessed as being consistent with national policy and seeking to significantly boost housing land supply.
- 3.3 The proposed deliver of less than 50% of the LHN and the failure to consider reasonable alternatives renders the Plan unsound.

# Contact

**Andrew Watson**  
Director

01732789785  
07850311337  
[AJWatson@savills.com](mailto:AJWatson@savills.com)

**Graham Wilson**  
Associate

01732 789755  
07966 633133  
[grwilson@savills.com](mailto:grwilson@savills.com)

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.  
A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD

The Savills logo, featuring the word "savills" in a lowercase, sans-serif font. The letters are a dark red or maroon color. The logo is positioned in the bottom right corner of the page, set against a light yellow background that is part of a larger geometric pattern of overlapping triangles in various shades of yellow and orange.