

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

Examination Statement: Matter 5 – The SA and Approach to Site Selection, Plan Viability and the IDP

September 2025

Contents

1.	Introduction/Background	2
2.	Response to the Inspectors Questions	3
	Stage 2, Matter 5: The SA and Approach to Site Selection, Plan Viability and the IDP	3
3.	Conclusion.....	6
	Contact	7

Document History

Issue	Date	Issued by	Comment
1.0	09/08/2025	AW/GW	
2.0	10/09/2025	AW/GW	
3.0	12/09/2025	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 5 questions concerning The SA and the Approach to Site Selection, Plan Viability and the IDP.
- 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 the SA and its use in Plan preparation, In particular:
- The Growth Scenarios considered in the SA do not test all reasonable strategic alternatives, contrary to legal requirements
 - There is no logical rationale for excluding southern sites (including COL023) from Scenarios 4 and 5.
 - The SA relies excessively on broad clusters, rather than assessing the merits of individual sites
 - The SA did not test a theoretical maximum capacity scenario, nor an “urban-only” or “no-Green-Belt” scenario
- 1.4 The distribution of development that underpins the submitted Plan is therefore based on partial evidence, incomplete at submission, and an inaccurate appraisal of options. As a result, the SA has not appropriately considered or assessed all reasonable alternatives, contrary to both policy and legislation.
- 1.5 This statement provides a response to Inspector’s questions 6.2, 6.4, 6.5, 6.8, 6.9, & 6.11 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 5: The SA and Approach to Site Selection, Plan Viability and the IDP

- 2.1 ***Q 6.2 - From reading the SA, I am not clear how the strategy on site selection to inform the reasonable alternatives has developed. Paragraph 4.1.5 states that the objective is to allocate a package of sites to meet needs and wider objectives. In terms of establishing growth scenarios, should the focus not be on alternative growth scenarios in the context of identified needs, rather than individual sites themselves?***
- 2.2 We agree with the Inspectors comment that alternative growth scenarios should be assessed in the context of identified needs rather than the sites themselves.
- 2.3 The approach of assessing potential housing sites in pre-defined clusters is not appropriate or justified. It restricts the allocation of suitable individual sites if other sites in the cluster are less appropriate, effectively limiting the range of options. It also distorts distribution: grouping sites into a “southern cluster” or “eastern cluster” meant that no site could come forward independently, even where it was otherwise suitable. This unbalanced method undermines the effectiveness of the Plan and prejudices deliverable sites such as Downs Road.
- 2.4 It also has the effect of unbalancing housing delivery. By grouping potential housing allocations into clusters, and then dividing them up geographically (as has been carried out through identifying a ‘southern cluster’ and an ‘eastern cluster’) there is no scope for only one site in a cluster to come forward. Therefore, the approach taken in the SA either allows either development of all sites in a cluster or no sites in a cluster. There is no scope for a sensible alternative where some sites in a cluster may be suitable and appropriate for an allocation. This immediately unbalances site delivery and places limits on the available distribution of development across the Borough.
- 2.5 As set out paragraphs in our response to Q2.4 of Matter 1, Chapter 5 of the SA seeks to define growth scenarios, with section 5.5 of the SA defining the reasonable growth scenarios. Scenarios 4, 5 and 6 have made inconsistent treatment of which sub-areas are included in the assessment scenarios. For example, the ‘south’ sub area is first included in Scenario 3, then not considered in Scenarios 4 and 5, before being included again in Scenarios 6 and 7.
- 2.6 There is no sound planning reason why including sites in the south sub-area would distort the overall spatial balance of development. On the contrary, excluding the south sub-area entirely — and excluding both the south and east sub-areas in Scenario 5 — produces an unbalanced distribution of growth. This approach disregards the fact that some sites within those areas are suitable and could reasonably have been taken forward

Q6.4 & Q6.5: -

6.4 What is the rationale for excluding the south sites (COL017, COL019, COL023) from growth scenario 4?

6.5 What is the rationale for excluding the south (COL017, COL019, COL023) and East (Downs Farm) sites from growth scenario 5?

- 2.7 Whilst questions 6.4 and 6.5 are directed at the Council, Atkins Properties shares the same concern: there is no logical rationale for excluding sites in the south (COL017, COL019, COL023) from Scenario 4, or for excluding both the south and east (including Downs Farm) from Scenario 5.
- 2.8 This issue is compounded by the mischaracterisation of COL023. Only the northern field was ever promoted for housing, with the other parcels (COL020, COL021, WOO019) explicitly offered for biodiversity and open space. Yet the SA treated the whole landholding as if it were developable. This error inflated the assessment of harm and dismissed a sustainable housing option.
- 2.9 As set out at Regulation 18, only the northern field of site COL023 has ever been promoted for development. The Regulation 19 submissions reiterated this position. However, the SA treated the whole site — both the northern and southern fields — as if it were proposed for housing. This is incorrect. The remainder of the land was explicitly put forward for biodiversity enhancement and/or public open space. By failing to disaggregate these areas, the SA has misrepresented the proposal and overstated its potential impacts. This error is significant, as the northern field could make a meaningful contribution to housing supply if assessed on its true merits
- 2.10 In summary, the Sustainability Appraisal is unsound and legally flawed. It has failed to test all reasonable alternatives, relied on inaccurate assumptions about the extent of development on specific sites, and excluded growth scenarios that could meaningfully address the borough's severe housing need.

Q6.8 - Concerns have been raised regarding factual inaccuracies raised with the Council in October 2023 within the SA as well as inconsistencies between the SA and the site assessment methodology (see representation 163 Carter Jonas). Could the Council provide a full response to the concerns raised?

- 2.11 Whilst this is primarily a matter for the Council to answer, we wish to further emphasise the inaccuracies identified in the Green Belt Study update, which in turn underpins the SA assessment, of Sites COL023, COL020, COL021 and WOO019. These concerns are set out in paragraphs 3.13 – 3.24 of the Regulation 19 representations.
- 2.12 These inaccuracies, and in particular the failure to disaggregate the northern field of COL023 from land promoted for non-residential uses, undermine the SA and the conclusions drawn from it. An assessment that overstates harm by misrepresenting the extent of land proposed for development cannot be considered robust.

Q6.9 – Have the individual site allocations been chosen according to a robust site selection methodology?

- 2.13 While the site selection methodology is sound in principle, it has been applied inconsistently. At Regulation 18 stage, submissions made a clear distinction between land proposed for housing (the northern field of COL023) and land promoted for biodiversity (COL020, COL021 and WOO019). Despite this, the subsequent assessments conflated these areas, leading to contradictory outputs between tables and figures. For example, Table 4 states that COL020, COL021 and WOO019 are not proposed for development, yet Figure 3 identifies them as potentially suitable allocations. This inconsistency is confusing and, more importantly, fails to identify accurately the part of COL023 that is genuinely promoted for housing.
- 2.14 Overall, whilst the approach set out is appropriate, the application of the methodology and the subsequent site assessments in the Site Assessment Methodology does not address matters that were raised at the R18 stage, and as a result the sites selected are not the result of the robust application of the methodology.
- 2.15 **Q6.11 - Have all reasonable alternatives been considered in terms of the spatial strategy, policies and sites including increases in density or the housing proposed over the plan period?**
- 2.16 No, all reasonable alternatives have not been considered as part of the spatial strategy or the sites included as site allocations. As set out in our response to Matter 1, the Councils own evidence base (in the form of the SA Non-Technical Summary) identifies on page 5 that there are three missing scenarios that fall between the scenarios tested, before on page 6 again drawing attention to one of the missing scenarios.
- 2.17 It is clear that the SA failed to test all reasonable alternatives. The Non-Technical Summary itself acknowledges “missing scenarios” between those tested. In addition, an “urban-only” or “no-Green-Belt” scenario was never assessed, despite the legal requirement to do so. Instead, every scenario assumed some Green Belt release from the outset, effectively predetermining the outcome
- 2.18 In respect of Downs Road, the Green Belt assessment, and as a result the SA, assessed both northern and southern fields as developable, when only the northern field was promoted for housing development. This mischaracterisation inflated landscape and sustainability impacts and materially affected the scoring of the site.
- 2.19 At the Elmbridge examination, the Council was required to revisit its SA to test previously excluded Green Belt alternatives. A parallel issue arises here: the omission of a Downs Road + Horton Farm scenario undermines the robustness of the appraisal and confirms that the full range of reasonable alternatives has not been considered
- 2.20 Deliverability evidence was also incomplete at the point of submission. Strategic transport modelling was unfinished, LCWIP schemes faced major feasibility uncertainties, and proposed bus service uplifts lacked commitment. A Plan underpinned by such incomplete evidence cannot be considered effective

3. Conclusion

- 3.1 The SA is flawed, the evidence base incomplete, and the Plan therefore unsound. Missing scenarios, mischaracterisation of sites, and reliance on unfinished evidence together undermine its justification. A sound plan requires the reassessment of reasonable alternatives, including disaggregated treatment of Downs Road and a balanced distribution of growth. Without this, the Plan cannot be considered sound in its current form

Contact

Andrew Watson
Director

01732789785
07850311337
AJWatson@savills.com

Graham Wilson
Associate

01732 789755
07966 633133
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, consisting of the word "savills" in a lowercase, sans-serif font, with the 's' in a darker shade of red than the rest of the word. It is positioned within a light yellow rectangular box.