

# Epsom and Ewell Local Plan Examination

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**Our ref** 14836/01/SSL/SFu  
**Date** 12 September 2025  
**From** Lichfields on behalf of the Church Commissioners for England 'The Commissioners'  
**ID** 155  
**Subject** **Matter 4: The Green Belt**

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

**Question 5.3 - A number of concerns have been raised that the Council have failed to address this point correctly or have severely underestimated the capacity of the urban sites which could be achieved whilst balancing the quality of the urban environment – are these concerns valid and where is the evidence base to address these points?**

- 1.1 The Commissioners, advised by their agents Savills, considers that the Council has proposed a density for the urban sites that is suitable to its context within the Borough. It is further considered that the viability and deliverability of these sites could be impacted were the density to be increased further. Build costs significantly increase when developing apartment blocks over 5 storeys in height and this is currently preventing many high density schemes from being delivered. The Commissioners therefore considers the Council's proposed density/estimated capacity for urban sites to be reasonable and justified. As set out below, in response to question 5.4, the Council has also evidenced there to be insufficient brownfield land available to meet housing needs.

**Question 5.4 - Are the exceptional circumstances outlined within paragraph 3.3 of TP02 to justify changes to the Green Belt boundaries suitably robust and do they justify the approach taken? A number of representations have stated that the Green Belt boundaries should not be reviewed as the Council has not done enough to optimise densities on brownfield sites. Are these concerns valid?**

- 1.2 The exceptional circumstances identified by the Council at 3.3 of TP02 are justified and robust – these are: a historic under delivery of housing, including affordable housing; a lack of five year housing land supply (most recently estimated at circa 2 years); failure of the Housing Delivery Test (2023 score - 38%); the increasing levels of homelessness in the borough; and, the quantum of households on the housing needs register (1,200 as of June 2022).
- 1.3 In line with the NPPF (2023), in seeking to meet the identified housing need, the Council should look to bring forward urban sites and previously developed land and make as much use as possible of this land (para 146). However, it is clear from the evidence work undertaken by the Officers, namely through the Land Availability Assessment (LAA, 2024-

HBO1a), that there is insufficient brownfield land in the Borough to sustainably accommodate this need. Further, as above, it is considered that the Council has proposed suitable densities for the urban sites given the context in the Borough and in consideration of wider issues with regard to viability and building at high density (see response to question 5.3).

- 1.4 In terms of the potential for any additional brownfield sites/ allocations, the Commissioners also note that the HEDNA (2023, HBO3) shows that there is a demand for additional employment floorspace in the area to meet the needs of existing businesses and cater for new businesses. The existing industrial sites at Kiln Lane and Long Mead are noted to continue to play an important economic role for the Borough and are identified as the most appropriate location for employment uses. This, therefore, highlights the competing needs the Borough must plan for and that these locations are not appropriate (nor available, as evidenced by the 2024 LAA - HBO1a) to accommodate the Borough's significant housing needs.
- 1.5 It has been evidenced by the Council that the urban sites can only provide c. 3,336 dwellings (c. 33% of the identified need for housing in the Borough). Therefore, given the extent of unmet housing need (evidenced by paragraph 3.3 of TP02), the Commissioners fully agrees with the Council's conclusion that exceptional circumstances exist to justify the release of Green Belt land in the Borough to meet housing need and to promote sustainable patterns of development.
- 1.6 In line with the NPPF 2023 (paragraph 146), the Commissioners notes that the Council has fully explored all other reasonable options for meeting its identified need for development, including exploring the potential for opportunities to meet housing needs outside of the Borough.
- 1.7 Therefore, the Commissioners fully supports that the proposed spatial strategy must include the release of Green Belt land. The Commissioners supports the principle of Green Belt release as part of the proposed spatial strategy for Epsom and Ewell and agree that this is necessary to meet housing needs. The Commissioners fully supports and confirms that the proposed allocation of Horton Farm and removal from the Green Belt, which would deliver approximately 1,250 homes (amongst other benefits – see response to Matter 11), makes a substantial contribution to the identified need over the Local Plan period (12.2%) and requirement (26.6%).

**Question 5.5 - Paragraph 147 of the Framework states that where it has been concluded that it is necessary for the release of Green Belt land for development, plans should first give consideration to land which has been previously developed and/or is well served by public transport. Has the Council taken this approach and where is the evidence to support this? GBO1 appears to indicate 4 assessments at paragraph 1.9 which do not include how well the site is served by public transport.**

- 1.8 Having concluded that exceptional circumstances exist and that it is necessary to release Green Belt for development, the Commissioners' site at Horton Farm (SA35) is a key site that the Council has identified to be sustainable for Green Belt release, to deliver (inter alia)

approximately 1,250 homes. The Commissioners fully supports this approach, and confirm that the site is suitable, available and deliverable.

- 1.9 The Horton Farm site is not previously developed land, but as above – the Council has concluded through its evidence base (HBO1 and HBO2) that there are not sufficient PDL sites that would enable it to meet its housing need. In its Green Belt Topic Paper TPO2, the Council concludes that Horton Farm is an appropriate site to release from the Green Belt under exceptional circumstances, including that *“it has well defined robust and durable boundaries on all sides which are also considered capable of forming a new Green Belt boundary in conjunction with the development of Chantilly Way”*.
- 1.10 The Commissioners confirms the site at Horton Farm (SA35) is currently well served by public transport (in particular by bus), in line with paragraph 147 of the NPPF (2023). To further enhance accessibility, including by public transport, parts a and b of the SA35 policy also require that the developer ‘Provide appropriate vehicle, pedestrian and cycle access to the site.’ alongside ‘Provide permeability through the site for pedestrians and cyclists into and from the development to provide connectivity between adjoining residential areas and associated facilities and Horton County Park’. The Commissioners confirm that both of these requirements are accommodated for within the current masterplan, as expanded on below.
- 1.11 In terms of existing bus provision, all roads around the site are well served by the local bus network with the bus stops adjoining the site located on Hook Road and Chantilly Way (for services E5 and E9, both orbital to Epsom town centre). Additional services are reached within a 5-7 minutes’ walk to the north of the site along Chessington Road (services 418 and 467) providing connections between Epsom, Tolworth, Surbiton and Kingston (Route 418) and between Epsom, Ewell, Chessington and Hook (Route 467). Additionally, there is an opportunity for route E9 to be diverted into the site, potentially improving the journey time of the route. This potential diversion is shown at Figure 4.6 of the Transport and Highways Technical Note, prepared by Pell Frishmann (the Commissioners’ appointed transport/highways consultants), submitted with the Regulation 19 Representations.
- 1.12 In terms of onward links by bus, as of March 2024, a new S2 (Transport for London) service runs seven days a week between Epsom Town Centre and St Helier Station, and serves key destinations including Ewell East, Cheam, and Sutton. This route has replaced the 470 service between Colliers Wood and Epsom, which now terminates at Sutton.
- 1.13 In terms of rail, there are several stations in the area that are easily reached from the site, particularly by bus and cycling, with services provided by Southwestern Railway (SWR) and Southern. Epsom and Ewell West railway stations are located approximately 1.75km from site. Ewell West is in the London Travelcard Zone 6, and therefore offers cheaper rail fares, Epsom Station falls outside the London fare zones but provides a wider flexibility in the number of destination options and is more accessible by public transport with bus routes E9 and E10 providing a direct connection; the station can also be reached in under 10 minutes by bicycle.
- 1.14 Horton Farm is therefore accessible to the existing public transport network – it is immediately adjacent to a number of stops with a range of destinations, including the train

stations (see the Vision Document which accompanied the Regulation 19 submission page 25). The public transport accessibility could be further enhanced through improvements to footways, cycle routes and pedestrian crossings, which have been within the Commissioner's initial masterplan (see the Vision Document pages 26 and 27). This could comprise contributing towards Epsom and Ewell Local Cycling and Walking Infrastructure Plans (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, as well as through to Epsom Common.

- 1.15 Section 4.5 of the Vision Document further sets out the site's transport and sustainability credentials – this includes section 4.4 which demonstrates the site's proximity to existing facilities & services. Aligned to this, Table 1 below demonstrates the current walking/cycling distance to existing amenities from the site.

Table 1 – SA35 Horton Farm - Proximity to Facilities & Services

Type of Amenity	Amenity	Distance from the site (m)	Walking Time (mins)	Cycle Time (mins)
Education	Southfield Park School / Cherryfield Nursery	600	8	3
	Danetree School	1,100	14	6
	Blenheim High School	1,500	19	8
	Epsom Primary School and Nursery	1,250	16	6
Health	Horton Haven Medical Centre	570	7	3
	Horton Pharmacy	240	3	1
	SAB NHS Trust	150	2	1
	Anachem Pharmacy	1,130	14	6
Place of Worship	Epsom Vineyard Church Centre	1,250	16	6
	All Saints West Ewell	1,670	21	8
	St Barnabas C of E Epsom	1,230	15	6
Leisure	Horton Country Park	600	8	3
	Horton Park Golf Club	850	11	4
	Hook Arena	780	10	4
	Hobbledown Farm Park	980	12	5
	David Lloyd Leisure Centre	780	10	4
	Epsom Riding for Disabled Association	480	6	2
Food Store	Tesco Express	200	2	1
	Costcutter Epsom	1,100	14	6
	Park & Shop Convenience Store	1,720	22	9

- 1.16 It is noted that the Council assessed submitted sites in its Transport Assessment ISO6 (2023) and ranked these according to accessibility. Horton Farm scored 17.5 in total (the top site scored 25.5, and the bottom 7.5). However, it should be noted that the scoring does not take into account the potential for sites to provide amenities on site. Horton Farm is

sufficient in size to provide infrastructure on site and any necessary enhancements – the allocation requires (inter alia) provision of a community building; capable of early years; primary care capacity; a 7Ha public park; and, business incubation space.

- 1.17 Indeed, the Council assessed the proposed spatial strategy in regard to accessibility, and access to public transport in the Sustainability Appraisals (PVo3 and PVo5). Paragraph 9.25 of PVo3 supports the accessibility of Horton Farm and also notes the opportunity for delivery of community infrastructure on the site. Paragraph 9.3.5 similarly notes that the site is to support improvements to pedestrian and cycle infrastructure.
- 1.18 It follows that the Horton Farm site is well served by public transport, aligned to paragraph 147 of the NPPF (2023)– it is a sustainable site for green belt release. There are also opportunities to further enhance the accessibility of the site through improvements to walking, cycling and bus routes.

**Question 5.6 - The Framework states that the Plan should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. Has this been done and where is the evidence to explain this?**

- 1.19 With regard to Horton Farm, the SA35 site allocation (part b) requires that the Commissioners’ masterplan incorporates, a publicly accessible park of approximately 7 hectares within the land to the north of the site. The masterplan will include walking, cycling and equestrian routes, and measures for surface water and biodiversity enhancement. The site will deliver a minimum of 10% biodiversity net gain.
- 1.20 The Commissioners considers that the proposals and requirements for compensatory improvements to Green Belt land for any given site should relate to its current baseline - both in terms of ecology and accessibility. The provision of compensatory improvements should be proportionate to what would be lost and mindful that, whilst ecological value and accessibility can sometimes come hand in hand, there is a careful balance to be struck. With regard to Horton Farm, in our view this evidence-based approach has been followed.

**Question 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?**

- 1.21 It is for the Council to respond on how the scoring system has been applied across the sites.

- 1.22 However, Tor&Co are the Commissioners' appointed consultants to advise with regard to the site at Horton Farm's current location within the Green Belt. As set out at the Regulation 19 stage, Tor&Co have reviewed the criteria and application within GBo1 and GBo2. Tor&Co support the Council's assessment overall but consider that there are further factors which could have a bearing to lower the Horton Farm (SA35) parcel's scoring. These factors add further support to the conclusion that the site is appropriate for release from the Green Belt, including:
- 1 The site is bounded by urban and built development. Insetting, particularly in the context of further release to facilitate sustainable growth in the parcel should be considered holistically. The Council identify a number of potential sites for inseting nearby – Long Grove Hospital, St Ebba's Hospital and Horton Hospital. This would result in a remnant area of open Green Belt land which is most strongly associated with the existing settlement and less contiguous with the wider Green Belt.
  - 2 The types of boundaries that could be achieved should a parcel be released from the Green Belt could be considered further. In the 2024 assessment, the parcel scores strongly against purpose 1 which appears to be determined by the presence of durable parcel boundaries. However, the parcel is also contained by built development at Long Grove Hospital, St Ebba's Hospital and Horton Hospital as well as the Horton Golf Course. The site therefore has a strong association with the existing urban areas and development would therefore maintain a compact rather than scattered or linear settlement form. On this basis, the Commissioners notes the recognition within the Council's Sustainability Appraisal that the sensitivity of Horton Farm *'potentially reduces once account is taken of adjacent Green Belt comprising redeveloped former hospitals sites and Horton Country Park. The site represents a near-unique opportunity to deliver a strategic scale scheme'*
  - 3 Importantly, an appropriate development strategy, maintaining the northern most quadrant as open (as is proposed in the Commissioners' masterplan – see Regulation 19 Vision Document), would create an entirely contiguous settlement edge with development at Long Grove Hospital and St Ebba's Hospital and so would not reduce the gap between Epsom/Ewell and Chessington.
- 1.23 Overall, the Commissioners is in agreement with the Council's conclusion that parcel o28/Hor09 *'follows a clear physical boundary' and that 'the site is surrounded by existing built development and would seem to round off the settlement edge.'*
- 1.24 Therefore, the Commissioners supports the Council's Green Belt assessment and considers it to be a key factor in favour of the site for future sustainable growth. Not least is the degree to which the site is associated with the existing urban areas and is *'self contained and the parcel has well defined robust and durable boundaries on all sides.'* In this respect, the parcel can accommodate growth without harm to the remaining Green Belt and would establish a strong Green Belt boundary that will endure beyond the next Local Plan period (NPPF 2023, para 145).

**Question 5.12 - If so, how would such requirements affect the viability of development on the relevant allocations?**

- 1.25 The Commissioners confirms that, if required, a future planning application for housing on the site at Horton Farm would be able to comply with the Golden Rules – these are: 50% affordable housing (when tested in accordance with the PPG on viability); necessary improvements to local or national infrastructure (to be determined through the future planning application); and, the provision of new, or improvements to existing, green spaces that are accessible to the public. The latter would be achieved through the proposed 7ha public park, alongside the opportunity to enhance permeability through the site, via the provision of active travel connections for existing residents in the west of the Borough (including Horton Country Park), to the Town Centre.
- 1.26 The Commissioners, in conjunction with their agent (Savills), has undertaken an assessment of allocation SA35 Horton Farm and are confident that, based on the information currently available, the site would remain viable delivering 50% affordable housing, alongside necessary infrastructure and the public park/green proposals. Savills has undertaken a range of sensitivity testing as part of the assessment to understand the influence of increasing/decreasing costs and values and variances in the form of development and quantum and mix of affordable housing. The Commissioners and Savills consider this to be a robust approach and are confident the site remains viable in a range of scenarios.

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