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# **EXAMINATION OF THE EPSOM & EWELL BOROUGH COUNCIL**

## **LOCAL PLAN 2022- 2040**

### **MATTER 3: VISION AND THE SPATIAL STRATEGY**

**On behalf of Epsom Projects Limited –  
Reg. 19 Rep. number: 159**

**September 2025**

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## 1.0 INTRODUCTION

- 1.1 This statement is submitted on behalf of Epsom Projects Limited (“Epsom Projects”) in relation to the Examination in Public of Epsom & Ewell Borough Council’s (‘the Council’) Local Plan 2022-2040 (‘the Local Plan’). Carter Jonas LLP is instructed by Epsom Projects.
- 1.2 Epsom Projects is the owner of Land off Cuddington Glade (**Land Availability Assessment (LAA) reference HOR004 – previously STA013**), which we can confirm remains available for development, and we firmly believe that it is suitable and achievable for much needed new homes. The Council’s ‘headline’ assessment of the site as recorded on the LAA Interactive Map, is as follows:
- “The site is in the GB [Green Belt], exceptional circumstances would need to be demonstrated for the site to be considered suitable.”*
- 1.3 Epsom Projects notes that in the Local Plan exceptional circumstances are cited to enable the review of Green Belt boundaries. Epsom Projects is therefore left somewhat bemused, and disappointed, by the fact that Land off Cuddington Glade is not proposed as a development site allocation.
- 1.4 In addition, post the publication of the revised National Planning Policy Framework (“the Framework”) in December 2024, the plan and its evidence have a significant omission, and that is that it does not consider **Grey Belt** land. It is Epsom Projects’ strongly held view that land off Cuddington Glade is Grey Belt land, and this is supported by the Council’s own analysis (a matter we return to later in these submissions).
- 1.5 The site should be allocated for residential development.
- 1.6 Epsom Projects made representations in response to the consultations held on the informal (Regulation 18) Plan and the Publication Plan (Regulation 19) consultation on the Local Plan.
- 1.7 In this submission, Epsom Projects sets out its responses to Matter 3: Vision and the Spatial Strategy.
- 1.8 This statement should be read in combination with Epsom Projects’ responses to the Inspector’s other Matters.

## Background

### Land off Cuddington Glade - Site Context

- 1.9 The Site is located to the southwest of Epsom town centre and within what was formerly known as the Hospital Cluster, part of Epsom’s historic psychiatric facility that accommodated five hospitals and various ancillary grounds. The conversion and redevelopment of the Hospital Cluster into predominantly residential dwellings was an important part of the spatial strategy of the Core Strategy 2007.
- 1.10 The Council’s evidence continues (as it has over the lifetime of plan drafting since 2017/18) to demonstrate that the site performs very poorly against the functions of the Green Belt, and there are exceptional circumstances cited in the Local Plan which would support its removal from the designation. Moreover, the Government’s introduction of the Grey Belt into national policy also suggests that the site could be developed, because it would not be an inappropriate use of Green Belt land.

- 1.11 The Site can deliver a high quality new residential neighbourhood that responds positively to its surroundings, whilst creating open space benefits for new and existing residents.
- 1.12 The site will comply with the 'Golden Rules' of delivering housing on (former) Green Belt sites.
- 1.13 The key benefits can be summarised as follows:
  - 1. Delivery of up to 50 new homes, including a mix of market and affordable housing to meet the local need identified by Epsom & Ewell Borough Council.
  - 2. Creation of usable open space for leisure, recreation, health and wellbeing including the provision of a new outdoor gym that can be utilised by new and existing residents.
  - 3. Enhancement to the existing network of footpaths and cycleways that bound the Site to improve usage by new and existing residents and reduce reliance on car use.
  - 4. Creation of a development layout that is responsive to the Site's constraints and opportunities, including the retention of important trees and existing vegetation.
  - 5. Include areas for surface water management to ensure that flood risk is not increased in areas outside of the Site.

## **2.0 ISSUE 4: IS THE PLANS APPROACH TO THE VISION AND SPATIAL STRATEGY JUSTIFIED, POSITIVELY PREPARED AND CONSISTENT WITH NATIONAL POLICY.**

- 2.1 Epsom Projects broadly supports the Council's approach to its spatial strategy, and suggests that whilst it is not currently sound, it could be made so with some relatively minor amendments. However, the spatial strategy is concatenated with the proposed housing requirement, which is fundamentally, and fatally, flawed.
- 2.2 The Council will need to review its housing targets, if not in this plan, then in the very near future. In doing this the Council will also need to identify further sites for development, and there are suitable sites available including land of Cuddington Glade which meet the spatial strategy and sustainability credentials set out in the spatial strategy. There is greater capacity for development across the Local Plan area, and especially in Winchester at Pudding Farm.

### **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?**

- 2.3 Epsom Projects is concerned that given the range of matters that need to be explored in relation to the Local Plan, and the likely subsequent length of the examination period, including Main Modifications etc, there is a significant risk that the plan will not be adopted by 31st March 2026. To ensure compliance with the Framework paragraph 22 requirement for strategic policies to look ahead over a minimum 15-year period from adoption, the Local Plan period should be extended.
- 2.4 To ensure compliance with paragraph 22 of the Framework, the Local Plan period must be extended to at least 2041, and modifications made to the Vision, and other text references in the plan.

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

- 2.5 Epsom Projects is not clear about the justification for a plan period which starts in 2022.
- 2.6 Starting the plan period in the past does not comply with Planning Practice Guidance (PPG) which encourages the use of the Standard Method for calculating housing needs. PPG is clear, and it repeatedly refers to the date of the Local Plan submission as the starting point for the calculation of housing needs, and therefore also for the start of the plan period. PPG is also clear that past trends are considered in the Standard Method (Reference ID: 2a-011-20241212) and therefore there is no need to consider this matter any further. Past trends should also therefore not be used as an argument to depart from the Standard Method.
- 2.7 Therefore, the Plan period should start in 2025 (or 2024 at the very least given that early in 2025 the plan was submitted).

**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.**

- 2.8 Epsom Projects notes that this is a specific question to the Council but suggests that the application of policies in the Framework that protect areas or assets of particular importance provides at least a good reason for restricting the overall scale, type or distribution of development in the plan area, which follows the provisions of paragraphs 8 and 11 (b) of the Framework.
- 2.9 However, the Council's evidence demonstrates that there is capacity for around 8,000 new homes, and this is without fully exploring the increasing of density.
- 2.10 Notwithstanding this, Epsom Projects generally supports the "Hierarchy of Development" as set out in the supporting text for Draft Policy S1.
- 2.11 A strategy which seeks to focus growth in sustainable locations, i.e. towards the town centre and existing employment locations, is strong and likely to be sound. The aspiration to see growth delivered in locations which are accessible to public transport is also strongly supported, not only by Epsom Projects, but also national planning policies.
- 2.12 Epsom Projects highlights that Land off Cuddington Glade is a good example of a site that whilst it is not in the town centre, or PDL, it is the 'next best option.' The site is close to the local centre on Horton Lane, and a 20-minute walk from the town centre, and the railway station (obviously quicker by bicycle), and is directly adjacent to a "movement corridor." It is all the more surprising then that the site is not proposed for a housing allocation.

**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?**

- 2.13 While this question is one for the Council to answer, Epsom Projects makes the observation that the allocation of more development sites is one way to secure a better mix of housing types, and certainly more affordable housing.
- 2.14 The delivery of affordable housing continues to be predominantly provided by private deliverers as a proportion of large-scale residential sites. Public sector delivery, and exception sites will only ever make small contributions to affordable housing delivery in the current economy and planning system. Therefore, allocating more development sites, and better reflecting the capacity of the borough to deliver more homes overall, will provide a more positive opportunity to help meet specific needs in the community. Moreover, releasing more sites from the Green Belt – where there is clear and logical evidence so to do – means that more can be made of the recent changes to the Framework, and the introduction of 50% affordable housing on such sites.

**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?**

- 2.15 In short, Epsom Projects believes that the submitted Local Plan fails to meet the Governments objective of significantly boosting the supply of homes.
- 2.16 The previous Standard Method results in a Local Housing Need (LHN) of 569 dwellings per annum (dpa) for Epsom & Ewell, which over the 18-year plan period equates to 10,242 new homes.
- 2.17 The previous Standard Method results in a need for 889 dpa or 16,002 new homes over the plan period.
- 2.18 The Proposed Submission Local Plan includes a 'housing requirement' of 4,700 new homes, this is just about 30% of the LHN and well short of 80% expected in the 'transitional arrangements' set out in the Framework:
234. *For the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply:*
- a. the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need*
- b. the plan has been submitted for examination under Regulation 2284 on or before 12 March 2025;*
- 2.19 Not achieving 80% of the LHN is likely to mean that the new plan will need to be examined against the extant Framework, but regardless of whether it is the extant version or the previous one, the Council will be required to review the overall strategy for the Local Plan in short order, because the Framework goes on to explain that:
236. *Where paragraph 234b applies, if the housing requirement in the plan to be adopted meets less than 80% of local housing need the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need*
237. *Those local plans that reach Regulation 19 (pre-submission stage) on or before 12 March 2025 and whose draft housing requirement<sup>87</sup> meets less than 80% of local housing need should proceed to examination within a maximum of 18 months from 12 December 2024, or 24 months of that date if the plan has to return to the Regulation 18 stage*
- 2.20 As is explored further in these submissions – in other Matters statements, and at Reg. 19 – Epsom Projects has demonstrated that the Council can do more to meet its LHN, it is not meeting its obligations to paragraph 60 of the Framework, and it should do that now, or at very least in an early review of the Local Plan.

