

**STAGE 2, MATTER 4:
THE GREEN BELT**

**EPSOM AND EWELL
LOCAL PLAN
EXAMINATION**

Land at Ewell East Station (Priest Hill)

Hearing Statement by Carter Jonas

On Behalf of Coldunell Limited

September 2025

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Date: September 2025

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1.0 INTRODUCTION

- 1.1 This Statement has been prepared on behalf of Coldunell, the owner of land adjoining Ewell East Station (Priest Hill).
- 1.2 This Hearing Statement focuses on questions raised by the inspector in the Matters, Issues and Questions (MIQs) in relation to Stage 2, Matter 4: The Green Belt.

2.0 ISSUE 5: IS THE PLANS APPROACH TO THE GREEN BELT JUSTIFIED AND CONSISTENT WITH NATIONAL POLICY?

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? GB01 appears to indicate 4 assessments at paragraph 1.9 which do not include how well the site is served by public transport.

- 2.1 We share the concern that accessibility to public transport has not been properly factored into the assessments undertaken in the Green Belt Study Update 2024 (GB01) and the Green Belt Technical Note 2023 (GB02). While passing references are made to public transport options in the site descriptions, the level of assessment falls well short of the requirement set out in paragraph 147 of the NPPF.
- 2.2 By contrast, GB01 and GB02 both include a discrete assessment of whether sites constitute previously developed land within the Green Belt. The omission of an equivalent assessment of public transport accessibility, which makes the Plan fail to be compliant with national policy in affording sufficient weight to this limb of Paragraph 147.
- 2.3 Had such an assessment been undertaken, additional sites that are well served by public transport could, and should, have been prioritised for consideration and unlocked for development to make a meaningful contribution towards meeting the Borough's acute unmet housing needs.

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?

- 2.4 Our concern, as set out in our Regulation 19 representations, remains regarding the inconsistent and subjective methodology adopted in the Green Belt Study Update (GB01).
- 2.5 In particular, the scoring applied in GB01 does not logically or accurately reflect the highly urbanised context and clear defensible boundaries of the Priest Hill site. The assessment against the Green Belt purposes, particularly purposes (a) and (b), is not consistent with the approach required under the NPPF, as detailed in our Regulation 19 representations. It remains unclear how, or indeed whether, these concerns have been addressed or rectified in the evidence base.

Question 5.9 - Could the Council be doing more to address the 5,500-dwelling shortfall?

- 2.6 We are of the view that the Council could and should do more to address the identified shortfall of 5,500 dwellings.
- 2.7 As highlighted in our other Hearing Statements, Epsom remains the second least affordable authority in Surrey, after Elmbridge, with median house prices exceeding 15 times local workplace earnings. Yet in

2024/25, the Council delivered only two affordable dwellings. In these circumstances, there is no sound or lawful basis for the Plan to provide for no more than 45.9% of the objectively assessed housing need; otherwise, the Plan is in no way effective and positively prepared to address its identified unmet needs.

- 2.8 The transitional arrangement at Annex 1 of the 2024 NPPF makes clear that the revised policies are material considerations when dealing with applications from the day of its publication, including those relating to Grey Belt land. There is accordingly no justification for the Plan to have no regard to this wider policy context. It is therefore imperative that all potential Grey Belt sites are given full consideration for housing release.

Question 5.14 - What does the wording of the policy add over and beyond the wording of the Framework. Is the policy justified?

- 2.9 We understand that draft Policy DM15 (Green Belt) does no more than replicate the wording of the 2023 NPPF.
- 2.10 As the transitional arrangement makes clear that the revised policies are material considerations when dealing with applications from the day of its publication, the draft Policy DM15 serves no useful purpose in this regard and will risk inconsistency with the national framework, particularly in relation to the approach to Grey Belt land.
- 2.11 As such, we submit that Policy DM15 should be deleted in its entirety.

