

Spatial Strategy Topic Paper

March 2025



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Executive Summary

From the outset a key driver for the council was to prepare a local plan that made a positive contribution to its identified development needs for both housing and employment, whilst recognising the special qualities of the borough that deserved protection. Being a green belt authority posed challenges and consequently several development scenarios were explored, informed by the evidence base.

At both Regulation 18 and 19 stages, the ability of the sustainably located strategic greenfield green belt sites to deliver affordable housing and other infrastructure provision was a key factor in developing the spatial strategy. Indeed, the HEDNA identified that our housing register was 1,200 households (June 2022) and as of January 2024 this had increased to 1,350 households. Consequently, the Regulation 19 version of the Local Plan included three greenfield green belt sites ((SA33-35¹) - totalling 1,580 dwellings), these will all provide 40% affordable housing (approx. 550 units) and make a significant contribution towards meeting affordable and market housing needs, gypsy and traveller provision (10 pitches), provide a community building, increase primary care capacity, provide new sports and recreation provision through a new sports hub, pavilion and 7ha public park, plus other green and blue infrastructure.

¹ SA33 – Land at Chantilly Way (approx. 30 dwellings)

SA34 – Hook Road Arena (approx. 100 dwellings plus new sports hub for the borough including playing pitches, pavilion and changing facilities)

SA35 – Land at Horton Farm (approx. 1,250 dwellings including specialist and self-build plots, 10 gypsy and traveller pitches, business space, community building and a 7ha public park and other green and blue infrastructure)

1 Introduction

- 1.1 This Topic Paper is one of a series, that sets out how the key strategies and themes of the submission version of the Epsom and Ewell Local Plan (2022– 2040), have been developed.
- 1.2 Each Topic Paper sets out the relevant national and local guidance that has informed the development of the Local Plan and sets out how the strategy has developed in relation to this guidance, in addition to the information, local evidence and consultation feedback that has informed the choices that have been made in the development of the Policies.
- 1.3 The Topic Papers do not contain any policies, proposals or site allocations, but relate to policies and site allocations set out within the Proposed Submission Local Plan.

2 Purpose of this document

- 2.1 The purpose of this Topic Paper is to provide an overview as to how the spatial strategy within the Local Plan has developed across the plan-making process.
- 2.2 The Topic Paper provides background information, including relevant national and local policies and sets out the key evidence and consultation feedback that has been taken into account in the development of the spatial strategy. It sets out the options that have been considered at each stage of the plan-making process, why the Council has selected its preferred spatial strategy and the aims of the spatial strategy. The main areas covered by this Topic Paper are:
 - National policy
 - Epsom and Ewell context;
 - Key issues and challenges for the local plan;
 - How was the spatial strategy was developed; and,
 - The spatial strategy set out in the Proposed Submission Local Plan.
- 2.3 This paper provides signposts to where further detail and information relating to matters discussed, including other Topic Papers, consultation documents, technical evidence base and supporting documents as well as national legislation, policy and guidance.

3 National Planning Policy context

3.1 In developing a spatial strategy for the Borough that will guide development over the plan period to 2040, the following key pieces of national policy and guidance have been taken into account:

- National Planning Policy Framework (NPPF) 2023 (and previous versions);
- Planning Policy for Traveller Sites (PPTS) 2015 (updated 2023); and,
- Planning Practice Guidance (PPG).

3.2 An overarching requirement of the NPPF is the achievement of sustainable development. Paragraph 8 of the NPPF breaks this down into economic, social and environmental objectives. This is supported by the ‘presumption of sustainable development’ as defined in NPPF paragraph 11. Fundamentally, these require that development is provided in the right places to support growth; vibrant, strong and healthy communities are delivered and that the natural environment is protected and enhanced.

3.3 Section 3 of the NPPF expresses the planning making framework, this requires Local Plans to have been prepared in accordance with legal and procedural requirements and whether they are sound. One of the ‘tests of soundness’ is for a Plan to be Justified – that is it presents ‘*an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence*’. This Paper therefore focusses on this element of the NPPF.

4 Epsom and Ewell Context

- 4.1 The following section sets out the local context in which the spatial strategy for the Local Plan has been developed.

A spatial profile of Epsom and Ewell

- 4.2 Epsom and Ewell is the smallest borough in terms of geographical area in Surrey. With a population of 80,900 (2021 Census) this being relatively high means it is the most densely populated borough in Surrey. The borough is situated on Surrey's northern border adjacent to London. Its adjoining neighbours include the London Boroughs of Kingston and Sutton, and the Surrey authorities of Mole Valley and Reigate & Banstead.
- 4.3 The spatial composition of the borough comprises an urban envelope to the north and centre, with a surrounding "horse shoe" of Green Belt.
- 4.4 The urban centre of the borough includes Epsom Town Centre and the Kiln Lane and Longmead Industrial Estates. These are the primary centres of retail, commercial, leisure, education and industrial activity in the borough. To the northeast is Nonsuch Park, a historic park and garden, Site of Nature Conservation Interest (SNCI) and valuable open space.
- 4.5 Figure 1 overleaf illustrates the key constraints in the Borough.

Key constraints in the Borough

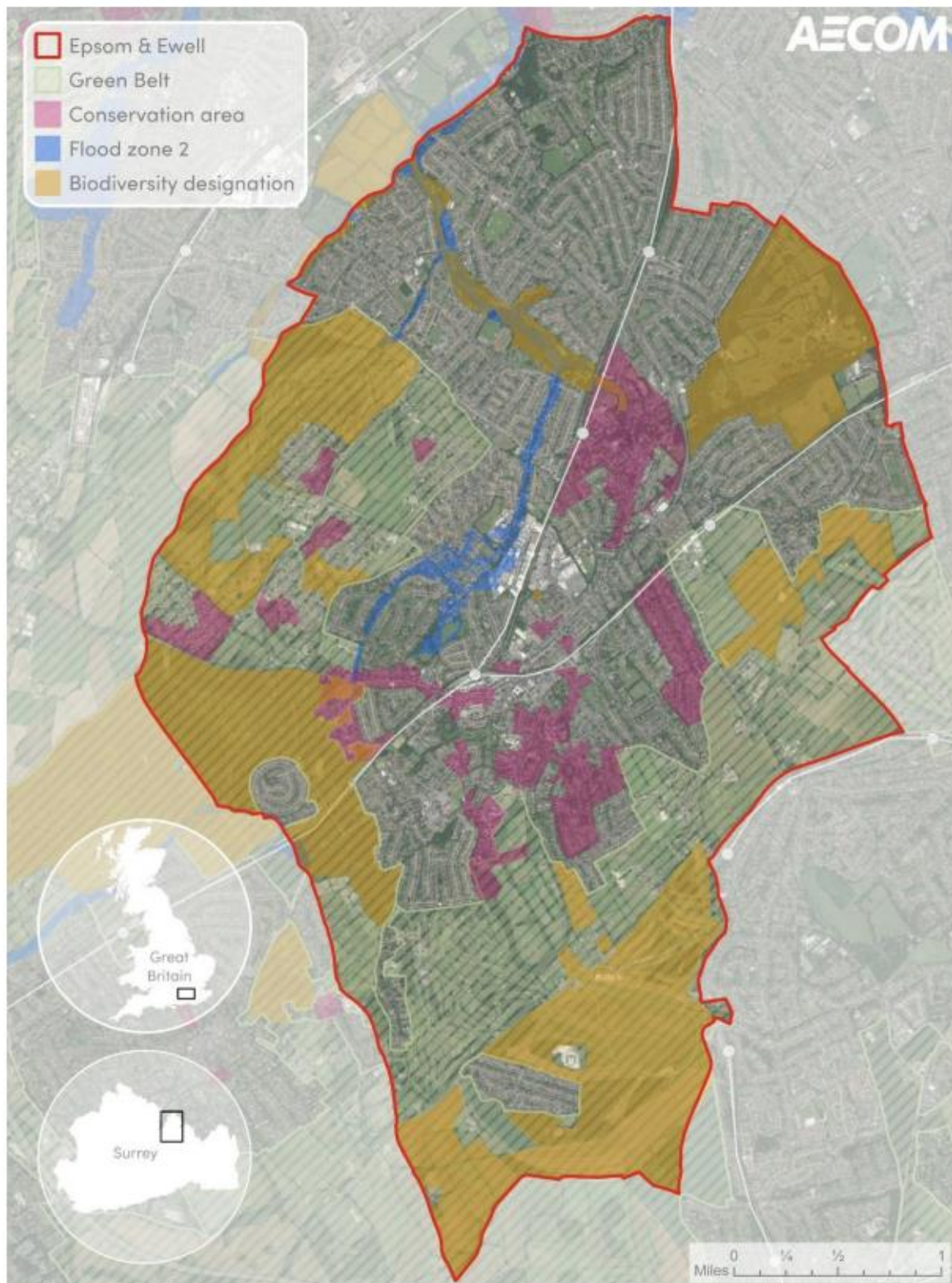


Figure 1 Map of the constraints within the Borough

Key issues and challenges

4.6 In deriving a balanced strategy for the borough, the Council identified several key issues and challenges that the Borough faces:

- significant environmental and other constraints including 42% Green Belt, SSSIs and Sites of Nature Conservation Importance (SNCI).
- balancing delivering additional growth and infrastructure that will support and benefit the changing population with protecting the boroughs environment.
- ensuring that future development is supported by the necessary physical, social and community infrastructure including green and blue infrastructure.
- delivering a sustainable level of housing growth having regard to the borough's constraints and meeting future housing needs.
- delivering a range of housing that meets a wide range of needs, for example related to size, tenure (including affordable housing) and specialist accommodation.
- providing space to enable local business to grow and to support
- delivering a range of housing that meets a range of needs, for example related to size, tenure (including affordable) and specialist accommodation
- providing space to enable local businesses to grow and to support and diversity the local economy.
- recognising the changing role of town centres and the changes to the way in which people work and shop.
- the limited land availability within the urban area to meet future development needs.
- changes to the Green Belt to meet the Borough's development needs will need to demonstrate exceptional circumstances.
- development will need to respect the character of the area and be designed and located to minimise its impact on the environment and that it mitigates, and is adapted for, climate change.
- preserving heritage and historic assets.

4.7 Some of the matters set out above are discussed in more detail in later sections of this Topic Paper.

5 Regulation 18 - How the Spatial Strategy was Developed

- 5.1 This section of the Topic Paper sets out how the Council's Spatial Strategy has evolved across the plan-making process. It sets out the key evidence, and engagement that has shaped the Council's approach, together with the role of the Sustainability Appraisal.

Core Evidence Base

- 5.2 Work on the Local Plan 2022-2040 started in early 2022, with the commissioning and updating of various elements of the evidence base to establish needs, constraints, issues and opportunities.

Housing Needs

- 5.3 The [Housing and Economic Development Needs Assessment \(2023\)](#) was commissioned to understand the housing needs and economic needs within the Borough. The study assessed the housing need (Local Housing Need LHN) using the standard method calculation (with a baseline 2022), this worked out to be 576 homes per annum or 10,368 dwellings over the plan period.
- 5.4 The HEDNA also identified a need for 652 affordable homes per year from 2022 to 2040, comprised of 574 rental properties (88%) and 78 affordable home ownership properties (12%). The HEDNA advises to take caution in comparing the Local Housing Need (LHN) figure and the affordable housing need figure as they have been derived from different methodologies and does not suggest that the LHN should be higher. What the data does suggest is that the tenure split of new affordable housing should reflect a majority of supply of rented units (either social or affordable rent).
- 5.5 Given the Borough is an attractive place to bring up children, projections in the HEDNA suggested that the number of households in the Borough with 3 or more children will outstrip the growth in smaller households, consequently there would be a continuing demand for family housing comprising three plus bedrooms, both market and affordable.
- 5.6 The HEDNA also provided data in relation to specialist housing for older people, (308 residential units and 180 nursing care bedspaces), the estimated need for an additional 600 wheelchair user homes. In addition, there is a requirement for about 573 student homes over the plan period.

Employment Needs

- 5.7 In addition to data from the HEDNA the Council also commissioned a [Longmead and Kiln Lane Industrial Estates Economic Value Report](#) . The HEDNA concluded that that the demand for office space had fallen, and the Council should plan only for 19,437sqm of office space over the period 2022 to 2040. With regards to industrial floorspace, it identified a need to plan for 9,021sqm for light industrial space, 9,554sqm for industrial space (B2) and 18,157sqm for warehousing (B8) over the plan period.
- 5.8 In order to accommodate the above employment growth the HEDNA recommended that the plan should aim to intensify existing identified office and industrial areas. Office clusters in Epsom Town Centre and East Street, present opportunities to meet office demand including through making use of vacant floorspace. With regard to the industrial areas the HEDNA recognised that it was “*essential to safeguard the employment land supply*” of the Longmead and Kiln Lane Industrial Estates (para 17.79, HEDNA 2022). This sentiment was echoed in the Longmead and Kiln Lane Industrial Estates Economic Value Report which framed the importance of these estates in the context of the wider regional economy.
- 5.9 The [Economy Topic Paper 2024](#) sets out the above in more detail and examines the capacity to meet employment floorspace needs through intensification of Longmead & Kiln Lane Industrial Estates over the plan period. The submission Local Plan proposes these estates to be ‘Strategic Employment Sites’ to help enable that intensification.

Gypsy and Traveller Needs

- 5.10 A [Gypsy and Traveller Accommodation Assessment \(GTAA\)](#) was commissioned in June 2022, which determined a need for 18 pitches over the plan period (10 that met the planning definition and 8 who did not meet the planning definition). It recommended that transit provision was not required. Amendments to the Planning Policy for Traveller Sites in December 2023 updated the planning definition of ‘gypsies and travellers’ to include those who have ceased to travel permanently. As a result, the identified need for Gypsies and Travellers meeting the planning definition has increased to 18 pitches.
- 5.11 The [Meeting Gypsy and Traveller Needs Topic Paper 2024](#) provides more detail as to the approach the Council has taken in seeking to meet this identified need.

Infrastructure Needs

- 5.12 An [infrastructure baseline](#) report was produced in 2023. This looks at the existing infrastructure provision and where there is sufficient supply and where additional infrastructure is likely to be needed taking into account future growth/development. The IDP looks various categories of infrastructure, including transport, utilities (e.g. wastewater, electricity, gas), and primary health care services. For example, in terms of sports facilities, the IDP baseline² highlighted a shortfall in provision of various facilities and identified that securing access to provision through ‘community use

² Informed by the [Playing Pitch Strategy 2021](#) and [Sports Facilities Assessment 2020](#)

agreements' could assist in meeting some of the need. Currently a significant proportion of existing supply is on land that is not in public ownership or is without any community use agreements and is therefore unsecure.

Epsom and Ewell Regulation 18 Transport Assessment

- 5.13 The Council commissioned a [Transport Assessment](#) (2023) which assesses the accessibility of potential site allocations. Each site was assessed for residents travelling by foot, cycle or public transport to the following key amenities including Primary Schools, Secondary schools, General Practitioners (GPs), Pharmacies, Town and secondary centres, Railway station, Green spaces. The assessment aimed to understand how easily can 1) key amenities be reached on foot, cycle and/or public transport, 2) which amenities may be required at the allocation site or nearby or 3) will new improved transport links be required. The results of the assessment are published in the Multi-Criteria Analysis part of the assessment where sites were listed from well performing to lowest performing.

Draft Epsom Town Centre Masterplan

- 5.14 The Council commissioned David Lock Associates to produce a Masterplan for Epsom town centre. The Masterplan was emerging at the time the Draft Local Plan was prepared, however it provided indicative proposals for a number of town centre sites. The emerging Masterplan was developed with input from the public and major landowners to enable a strategic view to be taken of what could be delivered on key opportunity sites, taking a context led approach.

Land Availability Assessment

- 5.15 In parallel to the development of the evidence base a 'call for sites' was advertised in March 2022 (see [Land Availability Assessment LAA](#)). The Council published its [Land Availability Assessment Methodology](#) in June 2022 and published the final assessment in November 2022. The [assessment](#) concluded that there is insufficient land within the urban area to meet the identified housing need, where just under 37% of housing need could be met. The deficit is significant enough that even increasing densities on the sites would not address the deficit.
- 5.16 As part of the Land Availability Assessment, the Council also sought to identify sites (not promoted through the LAA), that could assist in meeting development needs. This was essentially an urban capacity study that sought to identify sites through a desk top review of the borough, that could accommodate 5 or more dwellings or more than 0.25ha of employment floorspace. As part of this process the council wrote to the freehold landowners of the identified sites to encourage them to put their site forward through the call for sites process and a limited number of additional sites were submitted. An example of a letter sent to a freeholder is attached as Appendix 1.

SFRA Level 1 (2018)

5.17 The [SFRA](#) was produced in 2018 and updated a previous study to reflect changes to legislation, planning policy, guidance on the consideration of the predicted impact of climate change and flood risk data. This document informed the preparation of the LAA in 2022 including a sequential test, alongside the most up to date mapping available at the time from the environment agency on surface water flooding and fluvial flooding.

Local Plan Viability Assessment 2022

5.18 The Council commissioned HDH Planning to undertake a strategic [Local Plan Viability Assessment](#) to test the ability of the local plan to inform and support the Council's policy approach, particularly with regard to planning standards and planning contributions. The relevant objectives of the assessment were:

- Review of affordable housing policy within the borough (including tenure split)
- Whole plan viability to consider all other standards and policy requirements

5.19 The assessment tested varying levels of affordable housing requirements and policy standards (such as net zero carbon homes). It demonstrated that Greenfield sites were able to accommodate a higher level of affordable housing provision in addition to other policy requirements (set out in Table 10.9 on p144). The assessment recommended:

a. Affordable Housing

- Greenfield sites 40%,
- all other sites 30%.
- 10% of all the homes as affordable home ownership (33% at 30% and 25% at 40%). First Homes 25% of affordable housing. Affordable housing for rent as 50% Affordable Rent / 50% Social Rent.

b. Design

- 90% Accessible and Adaptable – Category 2, 10% Wheelchair Accessible,
- NDSS Water efficiency / Car Charging Points, 2025 Pt L Energy measures. Additional steps towards Zero Carbon on greenfield sites.

Green Belt Technical Note

- 5.20 The Council had a Green Belt Study published in 2017 and whilst the Introduction chapter was considered to be out of date, the methodology and findings of the report have been reviewed to ensure that they remain fit for purpose and robust to support the new Local Plan 2022-2040. The Council noted that little development had taken place in the green belt to affect the scoring contained within the 2017 study. The findings therefore remain robust and can be relied upon.
- 5.21 The Council therefore prepared a [Green Belt Technical Note](#) which it published in January 2023 alongside the Regulation 18 Local Plan consultation. This note set out the Green Belt evidence used to inform the Draft Local Plan and the methodology for future assessments intended to inform the next iteration of the Local Plan, notably:
- An assessment of major previously developed land, currently within the Green Belt
 - Any assessment of any anomalies which may have arisen or come to the attention of the Council, over time, concerning the current alignment of the Green Belt boundary
 - An assessment of the potential for defensible Green Belt boundaries around strategic sites to accommodate growth

Engagement

- 5.22 Throughout the evolution of the Local Plan officers have engaged not only with those bodies prescribed by legislation under the Duty to Cooperate, but also members of Epsom and Ewell Borough Council and specialists within other teams of the Council.
- 5.23 Through internal discussions and the evidence base available, it became clear that even in a scenario where all promoted Green Belt sites were considered for redevelopment, the full housing need as identified through the standard method, could not be realistically met without significant detriment to the character and environment of the borough. Priority was therefore to explore developing a *sustainable* strategy: the main variables to balance were the level of growth required and protecting the social and environmental character of the borough.
- 5.24 Various options were considered from meeting a significant amount of housing need through building in the urban area and releasing some areas of Green Belt, to partially meeting housing need through development in the urban area only, with various permutations in between these options including testing higher densities in the urban area and limited release of Green Belt land. Each option presenting different challenges and/or benefits in relation to meeting housing and economic needs, environmental protection and landscape protection.
- 5.25 The limited availability of previously developed land within the borough leads to the only alternative options of increasing density where appropriate and/or developing or extending outwards outside of the urban envelope into the Green Belt.

Duty to Cooperate, consulting with our neighbours

- 5.26 The Council has maintained continuous engagement with its neighbouring authorities regarding the unmet need. As work on the first iteration of the LAA was nearing completion and it became clear that meeting the borough's housing and Gypsy and Traveller needs would be challenging, the Council engaged with its neighbouring authorities and those within its housing market area to identify if they had the capacity to meet any potential unmet need. The Council was aware that many of these authorities also faced constraints and therefore other local authorities just beyond the London Metropolitan Green Belt in Hampshire, Berkshire and West Sussex were contacted to determine whether they could assist in meeting any of the borough's unmet needs.
- 5.27 Discussions on this matter are included within the [Duty to Cooperate Framework \(2023\)](#) and the [Duty to Cooperate Statement of Compliance \(2024\)](#). No authorities were able to assist in meeting the borough's need. Whilst different authorities were at different stages of plan-making, all are/were experiencing similar challenges to Epsom and Ewell Borough Council in terms of meeting their own development needs. The standard methodology generates a high figure for most authorities in the area.

Emerging Spatial Strategy

- 5.28 Historic housing delivery in the borough has averaged 197 dwellings per year between 2007-2004. Meeting the standard methods increased need of 569 was therefore a significant step change and with the overwhelming evidence that the Council was not able to meet its full needs within the urban area it was faced with a difficult decision with looking towards the edge of the urban area on the Borough's Green Belt.
- 5.29 [The Green Belt Technical note \(2023\)](#) set out the proposed methodology for a Green Belt Study update and briefly set out the Exceptional Circumstances for the release of Green Belt to meet future development needs.
- 5.30 In considering if there were strategic level exceptional circumstances to warrant an alteration to Green Belt boundaries regard was had to the National Planning Policy Framework, paragraph 146 states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries:

“the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account...whether the strategy;

- a) *makes as much use as possible of suitable brownfield sites and underutilised land;*
 - b) *optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and*
 - c) *has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground”*
- 5.31 The Council had explored a) and b) through a desk top study as part of the LAA process, call for sites exercise and development of the Draft Epsom Town Centre Masterplan (as set out earlier in this topic paper). It addressed c) through engagement with its duty to co-operate partners. Engagement (under c) with neighbouring areas concluded that they were unable to meet any unmet need arising from Epsom and Ewell.
- 5.32 In view of the outcomes, it was considered that there were exceptional circumstances to warrant alteration to Green Belt boundaries at this stage of the plan-making process.

Sustainability Appraisal (Regulation 18)

- 5.33 An [interim Sustainability Appraisal \(2023\)](#) (SA) was carried out alongside the draft Local Plan. This tested the various growth scenarios (reasonable alternatives) and appraised each against the sustainability indicators or 12 topics identified in the [SA scoping report \(2022\)](#).
- 5.34 Six scenarios were tested ranging from Scenario 1 Low growth in the urban area to Scenario 6 high growth in the urban area and significant release of Green Belt land, as indicated in Table 5.1 from the SA:

Table 5.1: The reasonable alternative growth scenarios (with constant supply components greyed-out)

Supply component		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Commitments ¹⁷		1,041	1,041	1,041	1,041	1,041	1,041
Windfall supply ¹⁸		561	561	561	561	561	561
Epsom town ¹⁹	Hook Rd car park and SGN						
	Town Hall cluster						
	Depot Rd and Upper High St	860	1070	1070	1070	1070	1070
	Ashley Centre						
	Other sites						
Wider urban area ²⁰	Corridors, stations, centres	830	1042	1042	1042	1042	1042
	Wider urban area						
Industrial estates ²¹		0	0	0	0	0	0
GB PDL ²²	West Park	150	150	150	150	150	150
Green Belt ²³	Horton Farm / Chantilly Way and Hook Road Arena	0	0	1675	1675	1675	1675
	Ewell East	0	0	0	350	350	350
	Downs Farm	0	0	0	0	650	650
	S. of Manor Park & SE cluster	0	0	0	0	0	980
Total housing supply		3,442	3,864	5,539	5,889	6,539	7,519
Supply per annum*		191	215	308	327	363	418

* It is important to recall that the housing requirement would need to be set a lower figure, to ensure a supply buffer. Also, by way of context, it is important to recall that local housing need (LHN) is 576 homes per annum.

¹⁷ Commitments are homes set to come forward at sites with planning permission.

¹⁸ Windfall supply is the supply of homes that can be assumed to come forward at sites without a local plan allocation.

¹⁹ In the town centre the scenarios reflect a choice between lower and higher density across the supported LAA sites.

²⁰ In the wider urban area the scenarios reflect a choice between lower and higher density across the supported LAA sites.

²¹ There is no reasonable scenario involving housing supply from the two adjacent industrial estates.

²² There is only one reasonable scenario with regards to supply from previously developed land in the Green Belt.

²³ On balance, there is judged to be five reasonable scenarios with regards to housing supply from Green Belt sites.

5.35 In summary these comprised:

- Scenario 1 : lowest growth (urban sites plus PDL in the Green Belt)
- Scenario 2 : Scenario 1 plus higher densities in the town centre and wider urban area
- Scenario 3 : Scenario 2 plus allocation of Horton Farm and Chantilly Way
- Scenario 4 : Scenario 3 plus allocation of Ewell East
- Scenario 5 : Scenario 4 plus allocation of Downs Farm
- Scenario 6 : Scenario 5 plus allocation of Land south of Manor Park and the SE Epsom cluster

5.36 The appraisal concluded that one of the mid range scenarios (Scenario 4) scored the best on 8 of 12 topic indicators identified in the scope of the assessment (as illustrated below). Scenario 4, comprised of higher density in the urban area, Hook Road Area, Horton Farm, Chantilly Way and Ewell East Station. This strategy was therefore taken forward for consultation under Regulation 18, in the Draft Local Plan. Appendix 2 includes an extract from the Interim SA, specifically the Council's response to the appraisal and reasons for support Scenario 4 on balance.

Table B: Reasonable alternative growth scenarios appraisal

Topic	Scenario 1 Low growth	Scenario 2 Scen. 1 + Higher density	Scenario 3 Scen. 2 + Hook Rd Arena	Scenario 4 Scen. 3 + Horton Farm & Chantilly Way	Scenario 5 Scen. 4 + Downs Farm	Scenario 6 Scen. 5 + S. of Manor Park & SE Epsom
Accessibility	4	3	2	1	2	2
Air quality	5	4	3	1	1	2
Biodiversity	3	2	1	1	1	3
Climate change adaptation	=	=	=	=	=	=
Climate change mitigation	4	3	2	1	3	3
Communities	=	=	=	=	=	=
Economy and employment	6	5	4	3	2	1
Historic environment	3	3	1	1	2	4
Housing	6	5	4	3	2	1
Land and soils	2	1	1	1	1	1
Landscape	2	1	1	1	3	4
Transport	4	3	2	1	2	3
Water	?	?	?	?	?	?

¹³ Red indicates a significant negative effect; amber a negative effect of limited or uncertain significance; light green a positive effect of limited or uncertain significance; and green a significant positive effect. No colour indicates a neutral effect.

6 Draft Local Plan (Regulation 18 Consultation Version)

6.1 At a [Special Meeting of the Councils Licensing and Planning Policy Committee on the 30 January 2023](#) , the Committee Approved the Draft Local Plan (Regulation 18) for six weeks public consultation.

6.2 The Draft Local Plan spatial strategy (Policy S1) is based upon reasonable growth Scenario 4 in the Interim Sustainability Appraisal (which was also subject consultation). The introductory text to the policy outlines the difficulties of balancing growth and development needs whilst minimising the impact on the environment and character of the Borough.

6.3 At its heart is a commitment to responding to the climate emergency and to deliver sustainable placemaking, contributing towards the achievement of sustainable development. The scale and location of growth proposed has been informed by careful consideration of the evidence and the balancing of the social, economic and environmental positive and negative effects which could arise from growth and development in the borough.

“...Our development strategy for the plan period recognises the environmental constraints, the availability of land for development, the viability of development and the need to balance matters such as supporting the local economy and providing for affordable housing.

Development will first be directed to the most sustainable locations, making the best use of previously developed land in the urban area. In sequential order... Whilst these sustainable locations are our preferred locations for new development, they do not deliver adequate housing to meet our social responsibilities for providing housing. For this reason, the Spatial Strategy incorporates appropriate previously developed land within the existing built-up area currently designated as Green Belt and green field land in the most sustainable locations adjacent to the existing built-up areas that is currently designated as Green Belt.”

6.4 The spatial strategy set out:

Policy S1: Spatial Strategy

During the plan period (2022-2040), provision has been made for at least 5,400 new homes which equates to 300 dwellings per annum.

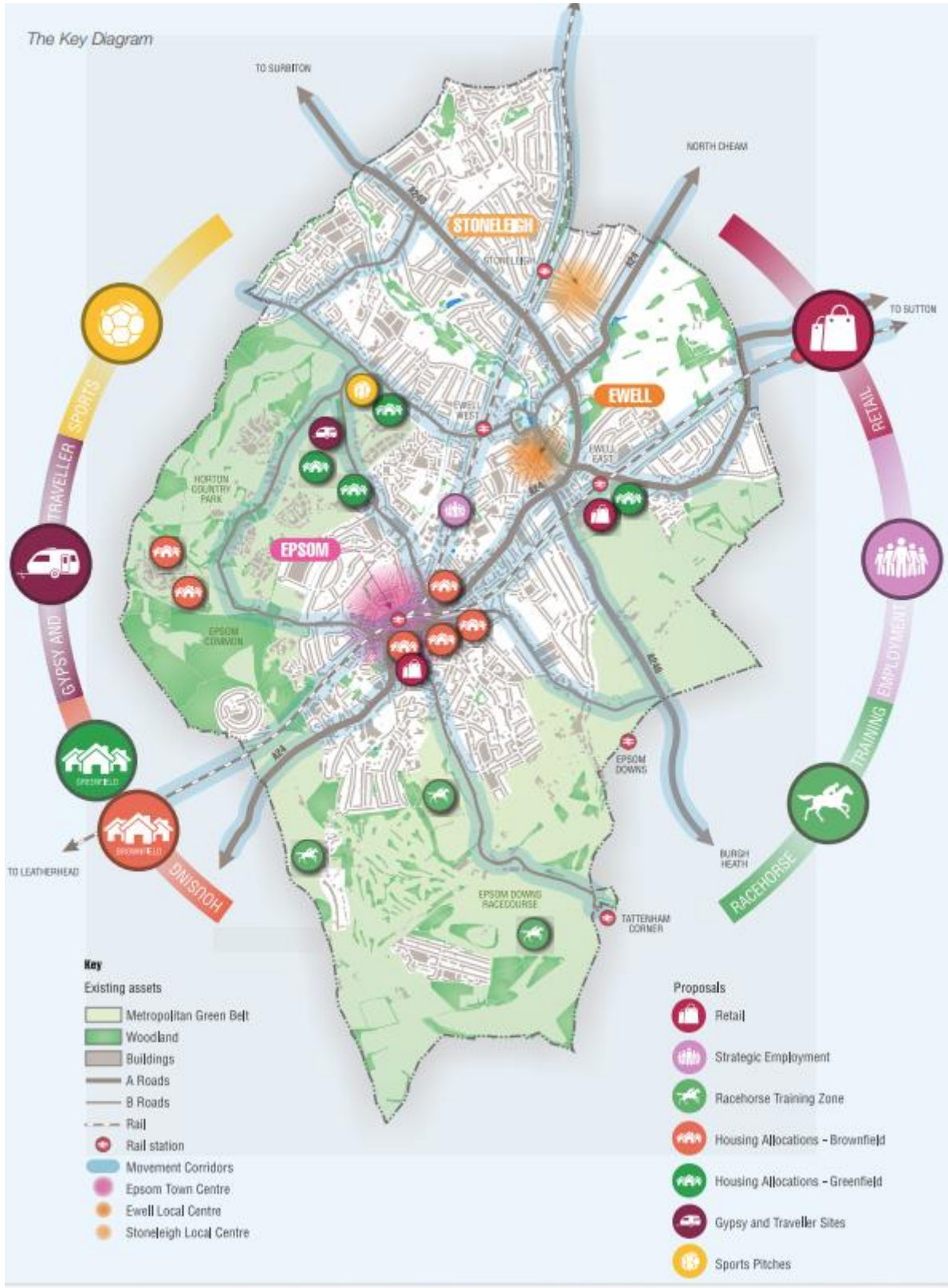
Employment needs (office, light industrial, industrial and warehousing) will be met through the intensification of existing strategic employment sites and the delivery of additional employment floorspace that is compatible with residential use in Epsom Town Centre.

Retail needs will be met within existing centres and through the provision of retail facilities within the Ewell East Station strategic allocation.

Provision will be made for at least 18 permanent pitches for Gypsies and Travellers over the plan period. This will be achieved through the allocation of a minimum of 10 pitches, with additional provision to be provided by permitting planning permission on suitable sites.

- 6.5 The housing requirement of at least 5,400 homes over the plan period or 300 dwellings per annum works out to be 52% of the housing need as derived from the standard method (2022 baseline). This level of growth was considered to strike a balance of sustainable growth and limiting the impact on the environment. As mentioned in paragraph 5.23 above, even factoring in all the promoted green belt sites, there is insufficient land available to meet the full housing needs in the Borough.
- 6.6 The Draft Local Plan allocated 9 strategic sites four within the Town Centre and 5 sites located in the Green Belt. The Plan also designated Longmead and Kiln Lane as Strategic Employment Sites.
- 6.7 Whilst the smaller sites within the built up area were not formal allocations at this point of Plan Making, Appendix 2 of the draft Local Plan listed the urban sites identified in the Land Availability Assessment (LAA) which had the potential to contribute towards meeting development needs over the plan period. It is important to note that the majority of the sites detailed in Appendix 2 were identified through the desktop review process of the LAA and at this time land availability had not been confirmed. During the consultation period the freehold owners of the sites with unconfirmed availability were contacted and encouraged to submit a call for sites form if they were planning to redevelop / develop their site over the plan period.
- 6.8 The Spatial Strategy for the Draft Local Plan is best visualised using the Key Diagram shown overleaf.

The Key Diagram



Results of the Regulation 18 Consultation and impact on the Spatial Strategy

- 6.9 The comments submitted to the consultation covered various sections, sites, and policies in the plan. Some parts of the plan attracted a proportionately higher number of responses. These included comments on Policy S1 Spatial Strategy and Policy S16 – Infrastructure and the majority of the site allocations including Policy SA6 – Horton Farm, Policy SA8 – Land adjoining Ewell East Station, Policy SA9 – Hook Road Arena.
- 6.10 In parallel to the consultation, the council re-opened its call for sites to encourage more sites to come forward for consideration. Site promoters submitted sites or submitted supporting information on proposed allocated sites to the Council for further consideration through the plan making process.
- 6.11 In total 1,736 responses were received during the consultation and the Council has summarised these in its [Consultation Statement \(Part 1\)](#), key issues emerging at this stage cover the following broad topics:
- Objection to release of Green Belt in general
 - Objection to the 5 green belt site allocations
 - Need to make more effective use of brownfield sites within the urban area
 - Lack of infrastructure to support growth

7 Regulation 18 to Regulation 19: Development of the Proposed Submission Local Plan

- 7.1 Following the consultation on the Draft Local Plan (Regulation 18) further evidence gathering continued, which would inform and support the next iteration of the Local Plan: the Proposed Submission Local Plan (Regulation 19). The core evidence base documents as listed below, were updated and new evidence commissioned as necessary.

Core Evidence Base

Land Availability Assessment 2024

- 7.2 The Council published an updated [Land Availability Assessment \(2024\) \(LAA\)](#) in September 2024. Landowners were contacted (checked via HM Land Registry records) and the freeholders were sent letters and supporting information in spring 2023 (the same exercise undertaken on the LAA 2022), to ascertain availability. Some additional sites were put forward for consideration for allocation through the call for sites process and these sites have been included in the LAA.
- 7.3 The previous iteration of the LAA (2022) included sites where the availability had not been confirmed, these were predominantly sites identified by officers as part of the desktop review process. Landowners were contacted again to determine whether these sites are available for development, sites that were still not confirmed as available were discounted from this version of the LAA as the lack of correspondence meant they were considered unavailable.
- 7.4 Since the initial LAA in 2022 the land available within the urban area has decreased. This is not surprising given that development would have been constructed and completed within this time and that sites which were not confirmed as available were removed. The conclusion from this assessment was that around 34% of the housing need can now be met within the urban area, a slight drop of 2-3% from the previous LAA.

Site Assessment Methodology 2024

- 7.5 The [paper](#) sets out how sites contained in the Land Availability Assessment (2022 and 2024) were assessed in greater detail. This included assessment of on-site and surrounding constraints, with a focus on accessibility to key facilities and services. Each site was assessed in matrix form against various policy constraints and criteria and with a conclusion as to whether the site was considered suitable for allocation, or not or those which require further consideration. The latter of these were mainly sites within the Green Belt.

Final Town Centre Masterplan

- 7.6 The Draft of the Town Centre Masterplan was subject to public consultation for a four-week period between the 24 November and 22 December 2023 during with 203 responses being received.
- 7.7 Following consultation, landowners on some of the opportunity sites commenced developing schemes for consideration through the submission of planning applications (including pre-application).
- 7.8 In finalising the Masterplan amendments were made in relation to the opportunity sites with sites that were previously assessed as a group (e.g. the Town Hall site and Hope Lodge) being assessed individually. This led to the increase in development capacity across the sites. The findings of the [Final Town Centre Masterplan](#) which includes separate [Appendices document](#) have informed the following town centre sites allocations in the Local Plan:
- Town Hall (SA5),
 - Hope Lodge Car Park (SA5)
 - Epsom Clinic (SA8)
 - Former Police and Ambulance Station site (SA9)
- 7.9 The Final Town Centre Masterplan was [approved by committee for publication](#) as part of the Local Plan Evidence base on the 11 March 2024.

Strategic Flood Risk Assessment Level 1 (2024)

- 7.10 The Council commissioned a Level 1 [Strategic Flood Risk Assessment](#) 2024 to reflect the latest policy, guidance and flood zone modelling. The SFRA makes several recommendations including recommending policies to address flood risk and to ensure that developments within defined sub catchment areas provide increased surface water drainage requirements. It also recommended that a level 2 SFRA be undertaken, this is undertaken at a site specific level and consists of predicting sources of flooding in order to safeguard land within development sites for potential flood mitigation use.
- 7.11 The outputs from the SFRA Level 1 fed into the LAA 2024 and Site Assessment Methodology 2024.

Green Belt Study 2024

- 7.12 Following the consultation on the [Green Belt Technical Note \(2023\)](#) at the Regulation 18 consultation stage, which outlined the methodology of an updated Green Belt Study. The Council published a [Green Belt Study Update \(2024\)](#) This study comprised various sections. Section 1 assessed the Green Belt Parcels against the purposes of the Green Belt as set out in national policy. Section 2 assessed major developed sites in the Green Belt and the Former Hospital for 'openness' and the potential for inseting from the Green Belt. Section 3 assessed whether there were any anomalies in the green belt boundary and where they could be corrected and the

final section looked at defensible boundaries around the promoted sites in the Green Belt.

Interim Infrastructure Delivery Plan and Regulation 19 Infrastructure Delivery Plan 2024

- 7.13 Following the close of the Regulation 18 consultation, further evidence base work and ongoing discussions with infrastructure providers, the IDP was updated twice in 2024. The [Infrastructure Delivery Plan Regulation 19 \(2024\)](#) version considered the infrastructure needs of a potential spatial strategy which included Green Belt releases. The needs identified are broadly summarised below:
- 7.14 Transport: Mitigation of the potential impacts of the proposed spatial strategy is likely to focus on measures to encourage the use of alternatives to the private car. Mitigation is likely to be delivered through schemes such as the [Local Cycling and Walking Infrastructure Plan \(LCWIP\)](#) and Bus Service Improvement Plan.
- 7.15 Utilities: Utility companies need to remain informed well in advance of anticipated new development to ensure the relevant services can be provided.
- 7.16 Education: Engagement with Surrey County Council as the local education authority identified that there is likely to be a surplus of primary and secondary places within the borough by the end of the plan period, mainly as a result of the falling birth rate. There may be an increased demand for early years provision.
- 7.17 Health: Development will increase demands on healthcare services within the borough. For primary healthcare, meeting this additional demand may be achieved through investing in existing facilities or, where appropriate, building new facilities.
- 7.18 Social and Community infrastructure: Needs were identified for additional sports pitches and sports hall provision which will be exacerbated by future population growth.

Local Plan Viability Assessment 2024

- 7.19 To support the Regulation 19 Local Plan, a [viability note \(2024\)](#) was prepared by HDH planning to reflect changes in costs and values since the 2022 Viability Assessment was undertaken. In addition, changes to policy set out in the Proposed Submission Local Plan have been reflected, including changes to affordable housing mix, net zero carbon requirements for residential dwellings and enhanced biodiversity net gain requirements.

Engagement

- 7.20 Further discussions were held with officers and members during Winter 2023/24 on both the local plan and emerging spatial strategy, to discuss potential spatial strategy options having regard to the evidence base.

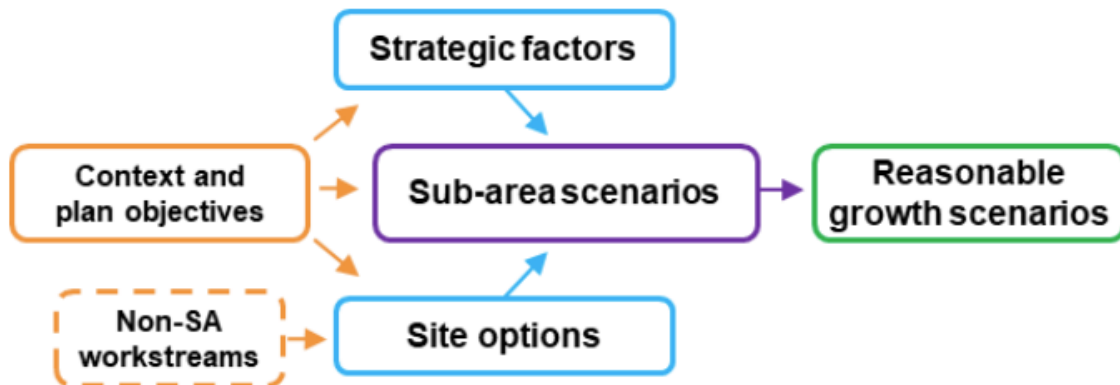
Duty to Cooperate, consulting with our neighbours

- 7.21 Ongoing DtC engagement has been documented in the [DtC Statement of Compliance \(2024\)](#). Following the update of the LAA in 2024, which showed that the housing land supply position had worsened slightly, the Council subsequently held further meetings with neighbouring authorities to establish whether there had been any changes to their land supply positions, which would enable some of the unmet need, including unmet Gypsy and Traveller need, to be accommodated elsewhere. Additionally, the Council again wrote to its relevant DtC partners and those beyond the London Metropolitan Green Belt to make similar enquiries. Of the responses received, none were in a position to assist.
- 7.22 The main reasons authorities were unable to assist were identified as limited site availability, difficulties in meeting their own housing needs and environmental constraints. The positions of the Council's four adjoining neighbouring authorities in terms of meeting housing need, illustrates the extent of the issue of unmet need in the wider locality (Appendix 3 provides an overview).
- 7.23 All four neighbouring authorities face similar constraints to Epsom & Ewell in that they have Green Belt designations and other constraints while having a significantly increased housing need under the updated standard method.

Sustainability Appraisal Regulation 19

- 7.24 The [Sustainability Appraisal](#) was updated for the Regulation 19 Proposed Submission Local Plan following the interim report published alongside the draft Local Plan (Regulation 18) (discussed in paragraph 5.33 above). Local Plans must be subject to SA where the purpose is to consider the likely effects of an emerging plan, and the alternatives.
- 7.25 The 2024 SA considers the additional evidence gathered since the interim SA and the range of growth scenarios. Additional growth scenarios have been included in the Sustainability Appraisal to test additional spatial growth options, for example scenarios 3, 4, 5 present alternative development growth options focused to the South, South East and North West Respectively. All scenarios are considered 'reasonable' in terms of providing the development needs and delivering on wider plan objectives.
- 7.26 The SA outlines the rationale of the reasonable alternative scenarios that were developed through a process which is set out in Section 5 of the SA and summarised in Figure 5.1, which is repeated below. The key strategic factors are 'quantum', the local housing needs for the Borough works to be 10,242 homes within the plan period 2022-2040 (this has increased by 56% since the publication of the NPPF on 12 December 2024 but will not apply to Local Plans submitted by 12 March 2025) and broad locations, so sub areas discussed in the interim SA for the draft local plan. Various reasonable alternatives were identified that are considered effective in delivering homes, infrastructure and other benefits.

Figure 5.1: A standard broad process to define reasonable growth scenarios



7.27 The SA ultimately identifies 7 reasonable growth scenarios for the borough (each comprising a combination of the sub-area scenarios). It acknowledges that in theory there could be a number of variations/permutations of these scenarios however pragmatically there is a need to keep the scenarios to a manageable level. The scenarios are listed below (details can be found in Table 5.2 of the [SA report](#)):

- Scenario 1 – lowest reasonable growth scenario
- Scenario 2 – Scenario 1 plus Hook Road Arena
- Scenario 3 – Scenario 2 plus South Cluster (SC)
- Scenario 4 – Scenario 2 plus Downs Farm (DF)
- Scenario 5 – Scenario 2 plus Horton Farm (HF)
- Scenario 6 – Scenario 2 plus SC, DF and HF
- Scenario 7 – Scenario 6 plus two further sites (HOR007 and HOR002)

7.28 In summary, the quantum of proposed development expressed in the scenarios is set out overleaf, together with the combination of sites:

Table 5.2: The reasonable alternative growth scenarios (with constant supply components greyed-out)

Sub area	Site(s)	1	2	3	4	5	6	7
Completions, permissions and windfall		1,918	1,918	1,918	1,918	1,918	1,918	1,918
Urban area	Non Green Belt	1,416	1,416	1,416	1,416	1,416	1,416	1,416
West	Hospital Green Belt PDL	200	200	200	200	200	200	200
West	Chantilly Way	30	30	30	30	30	30	30
West	Hook Road Arena		100	100	100	100	100	100
South	COL017, COL019, COL023			310			310	310
East	Downs Farm				675		675	675
West	Horton Farm					1,250	1,250	1,250
West	Noble Park ext. / Hollywood L.							150
Northeast	Land adj. Ewell East Station							350
Total housing supply		3,564	3,664	3,974	4,339	4,914	5,899	6,399

7.29 These scenarios were then assessed against the SA topics to reveal the following scores³:

Table 6.1: Growth scenarios appraisal summary

Scenario	1	2	3	4	5	6	7
	Low growth	Scenario 1 - Hook Rd Ad.	Scenario 2 - S. Cluster	Scenario 2 - Downs Farm	Scenario 2 - Horton Farm	Scenario 2 - SC, DF, HF	Scenario 3 - two sites
Topic	Order of preference (numbers) and predicted significant effects (shading)						
Accessibility	5	4	3	2	☆	☆	2
Air quality	3	2	2	☆	☆	☆	☆
Biodiversity	3	2	2	☆	☆	☆	3
CC adaptation	☆	☆	☆	☆	2	☆	☆
CC mitigation	2	1	1	1	1	1	1
Communities	2	1	1	2	2	3	3
Economy / emp.	7	6	5	4	3	2	☆
Historic env.	2	☆	☆	☆	☆	☆	3
Housing	1	1	1	1	1	2	☆
Land and soils	2	☆	☆	☆	☆	☆	☆
Landscape	2	☆	4	3	☆	1	1
Transport	4	3	3	2	☆	3	2
Water	2	2	☆	☆	☆	2	2

³ The table includes a row for each component of the SA framework and within each row, the aim is to **1**) rank the scenarios in order of performance (with a star indicating best performing and “=” used where it is not possible to differentiate with confidence); and then **2**) categorise performance in terms of significant effects using red (significant negative) / amber (moderate/uncertain negative) / light green (moderate/uncertain positive) / green (significant positive) / no colour (neutral).

- 7.30 The results of the assessment are illustrated above, which present a mixed picture, with drawbacks identified on both ends in terms of low growth and high growth scenarios.
- 7.31 On balance the Council selected Scenario 5 which performs the best overall, delivering the highest quantum of housing whilst performing well on the other topic/indicators than some of the other scenarios. Consequently, scenario 5 was consider to be justified in terms of para 35 of NPPF, in that it is “*an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence*”.
- 7.32 Further detailed explanation on the preferred scenario is below and set out in chapter 7 of the [SA](#) and from p5 of the [SA Non technical summary](#). (See also Appendix 4).

Key Changes from the Regulation 18 Local Plan SA:

- 7.33 Evidence within the [Land Availability Assessment 2024](#) and [Site Assessment Methodology](#) paper demonstrates a supply of realistic sites for development that are in alignment with the Council’s brownfield-first approach. Where urban sites have been identified as being suitable, available and achievable they have been included in the urban supply. These brownfield sites in combination with other sources of supply, including some development on Green Belt sites (which are discussed in the [Green Belt Exceptional Circumstances Topic paper](#).) development in the pipe line (completions, outstanding commitments), and the incorporation of a small and large windfall allowance (see [Larger windfall Allowance Topic Paper](#)) will deliver up to 4,914 new homes over the draft Local Plan period (2022-2024).
- 7.31 The site capacity of some sites that feature as constants in the urban area supply have increased following the finalisation of the Epsom Town Centre Masterplan, including the Town Hall Site (SA5) and Hope Lodge Car Park (SA6).
- 7.32 The site capacity at Horton Farm (former policy SA6 now policy SA35) has reduced from a minimum of 1,500 dwellings to approximately 1,250 taking into consideration further work undertaken by the site promoters on the potential capacity of the site. Hook Road Arena (former policy SA9 now policy SA34) capacity has been reduced from a minimum of 150 dwellings to approximately 100 dwellings however the provision of a new sports hub for the borough remains part of the allocation to increase the available secured supply of sports pitches and facilities in the borough.

8 Regulation 19 - Publication of the Proposed Submission Local Plan

- 8.1 The Council published the Proposed submission Local Plan under Regulation 19, on 20 December 2024 up to 5 February 2025 following [approval by Council on the 10 December 2024](#). The decision at full council followed a [recommendation from the Councils Licencing and Planning Policy Committee on the 20 November 2024](#). The spatial strategy reflects scenario 5 of the sustainability appraisal (which was also subject to consultation) and is detailed as set out in Policy S1 - Spatial Strategy:

Policy S1 – Spatial Strategy

- 1) During the plan period (2022-2040), provision has been made for at least 4,700 new homes. Table S1a shows the contribution of all sources of housing supply to deliver this housing requirement.
- 2) Employment needs (office, light industrial, industrial and warehousing) will be met through the development and intensification of the strategic employment sites (as defined on the policies map), and the delivery of additional employment floorspace that is compatible with residential use in Epsom Town Centre.
- 3) Retail needs will be met through the consolidation and enhancement of existing facilities within existing Epsom Town Centre, local centres and neighbourhood parades.
- 4) Provision has been made for 10 permanent pitches for Gypsies and Travellers within Epsom and Ewell over the plan period. The council will seek to make provision for additional pitches for Gypsies and Travellers by permitting suitable sites.

- 8.2 The approach to the spatial strategy is considered to represent an appropriate strategy for Epsom and Ewell that has regard to the borough's constraints. It focusses on making the effective use of land in the existing built-up and urban areas and releases suitable brownfield (previously developed) sites in the Greenbelt and a Cluster of Greenfield Green Belt sites to the West of the Borough which are accessible and make a significant contribution towards meeting needs for housing (including affordable homes), gypsy and traveller accommodation and community infrastructure (including new community buildings(s), public open spaces and sports provision). This approach is considered to be in alignment with the NPPF (2023) and is considered to represent a sustainable pattern of growth for the Borough.
- 8.3 The Proposed Submission Local Plan now also includes smaller allocations within the urban area which were previously identified in the Regulation 18 but were not proposed for allocation at that time, reasons included availability of the site being unconfirmed. These sites are now considered to be suitable, available and achievable.

- 8.4 The Council has set a housing requirement in policy S1: Spatial Strategy to deliver at least 4,700 homes between 2022-2040 or the equivalent of approximately 261 dwellings per annum. This has been set slightly below the supply identified in the housing trajectory to provide a realistic buffer. 4,700 new homes is the equivalent of 46% of the housing need for the Borough generated by the standard methodology which is 10,242 dwellings over the plan period. It is acknowledged that the proposed housing requirement does not meet the need in full, but the Council considers this spatial strategy is an appropriate and balanced strategy, which is supported by the findings of the Sustainability Appraisal.
- 8.5 In order to meet the housing requirement, the Proposed Submission Local Plan comprises of 30 allocations within the built-up area (site allocations SA1-SA30) and 5 sites to be inset from the Green Belt (site allocation SA31-SA35) to accommodate 1580 dwellings over the plan period.
- 8.6 The urban allocations comprise 30 sites, of which 24 sites are smaller than a hectare in size and make up 720 units (not factoring in commitments or windfall allowance). The 720 units works out to be 15% of the housing requirement which would comply with paragraph 70 in the NPPF for at least 10% of the of the housing requirement to be accommodated on sites no larger than 1 hectare to ensures a sufficient supply and mix of sites are available. Sources of supply over the Plan period are summarised in Table 1a of the Local Plan Sources of supply over the Local Plan period: 2022-2040 (net number of new homes):

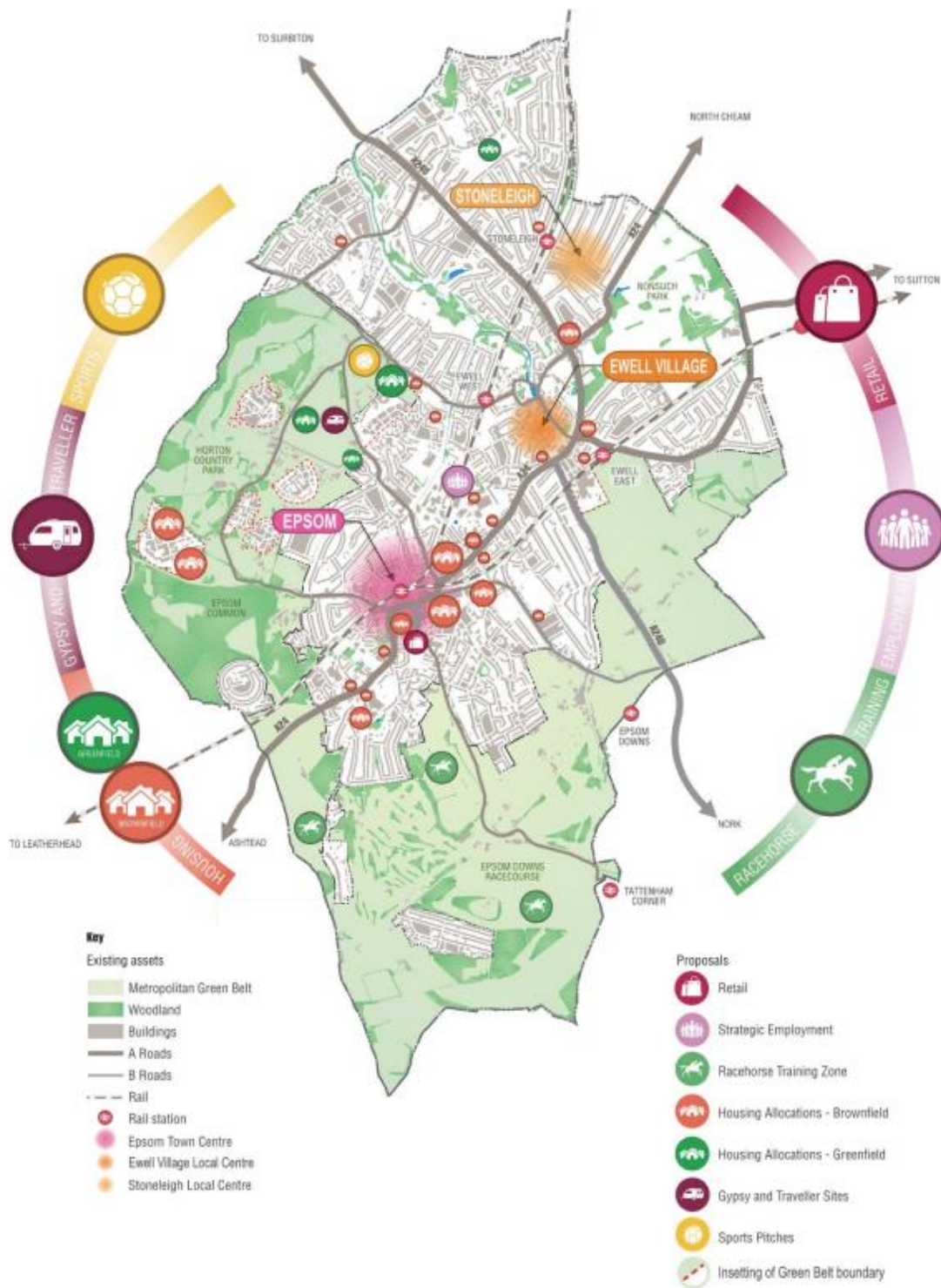
Source of supply	Net no. of units
Housing Requirement	4,700
Housing completion to date (April 2022 to March 2024)	456
Commitments (permissions as of April 2024) with 10% lapse rate applied	600
Windfall (1-4 units)	455
Windfall (5-19 units)	407
Large urban sites (20+ units)	1,313
Small urban sites (5 to 19 units)	103
Allocations beyond current urban area to be inset from the Green Belt	1,580
Total supply over the plan period	4,914

- 8.7 A key change from the [Draft Local Plan \(Regulation 18\)](#) and the [Proposed Submission Local Plan \(Regulation 19\)](#) is that one of the site allocations proposed in the Green Belt former policy *SA8 Land adjoining Ewell East Station* has not been carried forward to this Proposed Submission Local Plan. This was due to deliverability concerns with the site that could not be resolved within the plan period. Discussions with the landowner revealed a long lease on the site to a sports club who had objected to the allocation at the Regulation 18 consultation stage. This issue of deliverability means that the council is not satisfied that the site could deliver over the Local Plan period.
- 8.8 Further information on the different types and tenure of housing and the policies that seek to address the various needs within the Borough are explained in detail in the

[Housing Topic Paper \(2024\)](#) and [Meeting Gypsy and Traveller Accommodation Needs Topic Paper \(2024\)](#). The spatial strategy will support delivery of affordable homes in addition to infrastructure (such as through the community infrastructure levy), as evidenced in the Local Plan Viability Assessment (2024).

- 8.9 The employment floorspace needs over the Plan period are projected to be approximately 35,000sqm. The spatial strategy focuses intensification of employment land uses within the established industrial estates, principally through the protection of employment uses in these areas and support for intensification and redevelopment to meet market needs. This approach is broadly similar to that taken in the Regulation 18 draft Local Plan: the changes in the Proposed Submission Local Plan include a small extension to an existing strategic employment site and the inclusion of the requirement for business incubation floorspace as part of the SA35: Land at Horton Farm allocation. Further detail on employment land needs and supply in relation to the land needs and supply for the Proposed-Submission Local Plan, is set out in the [Economy Topic Paper](#).
- 8.10 The Local Plan spatial strategy is also supported by:
- An [Infrastructure Delivery Plan](#) that has been prepared in conjunction with infrastructure providers. It also identifies the likely infrastructure requirements needed to support the spatial strategy including the provision of infrastructure already agreed.
 - A [Strategic Highways Modelling Assessment Report 2024](#) produced by the highway authority to assess the potential impact of the Spatial Strategy on the Highways Network.
 - A [Level 2 Strategic Flood Risk Assessment](#) which assessed specific site allocations in detail for the susceptibility to flooding from all sources and the mitigation that can be put in place.

Proposed Submission Local Plan Key Diagram



9 Conclusion

- 9.1 This paper explains how the Council has developed its spatial strategy across the plan making process. The development of the spatial strategy has been supported and informed by an extensive evidence base and Regulation 18 consultations with our communities and other stakeholders. The Council has tested a range of spatial options and has explored their implications across a range of sustainability objectives.
- 9.2 In addition, the Council has also undertaken considerable engagement and shared its evidence base with key stakeholders throughout the process. This is reinforced and informed by its collaborative working with key bodies on strategic matters under the Duty to Co-operate.
- 9.3 The spatial strategy set out within the Proposed-Submission Local Plan promotes sustainable patterns of development and reflects the Council's place-making ambition and commitment to tackle climate change. The Council's brownfield-first approach will concentrate growth within urban areas and will support the Council's wider ambitions Epsom Town Centre, whilst safeguarding open spaces, and other areas recognised for their ecological importance. A significant element of the strategy is to support high quality and high density development within Epsom Town Centre, in order to support regeneration and the future vitality and viability of the town centre.
- 9.4 The release of some Green Belt land for development is focused to the west of the Borough, to optimise delivery in the most sustainable and accessible areas where it will help meet a significant part of the Council's housing need (including affordable housing), assist in meeting needs for gypsy and traveller accommodation and deliver additional infrastructure (including community facilities and sports facilities).

Appendix 1: Example of letter sent to landowners.



Town Hall
The Parade
Epsom
Surrey
KT18 5BY

Main Number (01372) 732000
Text 07950 080202
www.epsom-ewell.gov.uk
DX 30713 Epsom

Date: 18/07/2022
Your Ref: **Site Ref**
Our Ref: Land Availability
Assessment

Contact
Direct line



Email Localplan@epsom-ewell.gov.uk

Dear Sir or Madam,

Land Availability Assessment

We are contacting you to understand whether you have development aspirations for the land identified on the enclosed site plan. Land registry data indicates that this land is in your ownership.

The reason we are asking is because we are currently gathering evidence to inform a new Local Plan for the borough of Epsom and Ewell. As part of this, we are undertaking a Land Availability Assessment to understand what land is available within the Borough and whether it could accommodate future development (for example new housing, employment or retail).

Following a review of land in the borough, we have identified land (outlined in the attached site plan, which may have potential to deliver additional development over the plan period.

If as landowner you have any development aspirations for the land in the future, please could you complete the enclosed form and return it by post or email it to us. The attached form can also be completed online using the link below:

<https://epsom-ewell.gov.uk/residents/planning/planning-policy/local-plan-call-sites>

Please note that by completing the attached form, you will be promoting your land for development and the land will be considered "available" for development. This simply means that the land will be published with a reference that there is known interest for the land coming forward for development in the future. However, if you do not wish to promote the land for future development you do not need to take any action. We will identify the land as "unavailable" in our assessment.

If you wish to respond we would be grateful if you could return the form by **5 August 2022**.

Should you wish to have an informal discussion about this letter please do not hesitate to contact the named officer above.

Appendix 2: Extract from Interim SA 2023

7.2.1 The following statement explains EEBC officers' reasons for supporting **Scenario 4**:

“Meeting housing need locally is a priority issue, and generating unmet need leads to a wide range of issues at the Surrey / sub-regional scale. However, the appraisal serves to highlight a range of drawbacks to higher growth. As such, the plan seeks to follow a middle path, striking a balance between competing objectives.

In particular, the appraisal serves to highlight significant drawbacks to Scenarios 1 and 6, and we believe that significant weight can be attributed to these drawbacks, such that Scenarios 1 and 6 are judged to perform poorly overall. With regards to Scenario 1, we agree that there is a need to take steps to minimise unmet housing need as far as possible. There is a national and local housing crisis, for example mindful that only 15 affordable homes have been delivered in total over the past two monitoring years, in comparison to an identified need for 652 per annum. Furthermore, minimising unmet housing need is important from wide-ranging other perspectives, including from a perspective of supporting the local and sub-regional economy supporting the achievement of transport, decarbonisation and certain environmental objectives. With regards to Scenario 6, it is recognised that the effect would be to minimise unmet housing need; however, the predicted impacts to the local area are cumulatively judged to be unacceptably high. Fundamentally, Epsom and Ewell is a heavily urbanised borough where remaining parcels of undeveloped Green Belt land are precious and must be protected. This is the widespread view locally, but this view also aligns strongly with latest Government policy.

The merits of the four middle performing scenarios are more finely balanced. However, it is considered appropriate to highlight Scenario 2 as performing least-well. This is because of the level of unmet housing need that would be generated. There is a need to release some greenfield Green Belt land for development.

Differentiating between the overall merits of Scenarios 3, 4 and 5 is more challenging. However, on balance, Scenario 5 is judged to be the least preferable of the three. The site that would be additionally allocated under this scenario – Downs Farm – is subject to considerable landscape constraint, particularly in the sense that development could put at risk the ability to maintain a defensible landscape gap between Epsom and Banstead in this area. Also, the site would deliver limited benefit to the local area (the proposed school is noted, but there is not currently known to be a need for a new school in the borough, even under higher growth scenarios) and the proposed walking/cycling link to Epsom Downs Station is somewhat indirect. These conclusions are reached on the basis of scheme assumptions that are subject to change, and it is recognised that the option of housing growth here may require further consideration, recognising the importance of closing the gap to housing need.

Looking at Scenarios 3 and 4, there is a clear preference for **Scenario 4** as this is a higher growth scenario and because the site additionally allocated under this scenario, namely **Land adjoining Ewell East Station**, is judged to perform well in several respects. In particular, it performs well in transport terms, given the adjacent train station, but it will also make provision for retail to meet an existing need within the local area. There are some challenges to bringing the site forward, most notably in respect of providing sports pitches, but these are not insurmountable, and there is also good potential to define a new defensible Green Belt boundary, given Nescot (North East Surrey College of Technology) playing fields to the west, built form to the north and east and Priests Hill SNCI to the south. For all these

reasons, there are judged to be exceptional circumstances to justify the release of this land from the Green Belt.

Finally, with regards to the three other greenfield Green Belt sites proposed for allocation under Scenario 4 (Horton Farm / Chantilly Way and Hook Road Arena), the discussion presented above has already served to explain why there is support for allocating these sites and why exceptional circumstances to justify the release of these sites from the Green Belt are judged to exist. However, for completeness, key considerations include:

- **Horton Farm** – is subject to limited constraint and there is the potential for a ‘strategic’ urban extension that delivers a good mix of housing *and more* (including land for Gypsies and Traveller pitches, which is a very important consideration); indeed, it is the only option to deliver a strategic urban extension that is known to exist (if Downs Farm is judged not to warrant this status). The site performs reasonably well in transport terms, and there are few if any concerns regarding future development creep / sprawl. Furthermore, it is anticipated that growth here will complement the development that has happened to the west of Epsom across the former hospitals cluster sites (following the Core Strategy, 2007), from a place-making perspective. At the current time it is not clear whether a primary school is needed, but it is anticipated that there would be the potential to deliver one should the need be identified through the consultation on the Draft Local Plan.
- **Chantilly Way** – is a small site that links very closely to Horton Farm, and gives rise to few concerns. There is a question regarding the appropriate number of homes to deliver on site, given its linear configuration.
- **Hook Road Arena** – performs well on the assumption of built form in the southern part of the site only, with a new sports hub delivered in the northern part. Ewell East Station is nearby, and this is Council owned land, which leads to confidence and flexibility in respect of what can be delivered onsite.”

Appendix 3: Overview of neighbouring local authorities position in relation to housing need

Neighbouring Authority	Status of Local Plan	Current adopted housing target (dpa)	Standard Method Housing Need (dpa) post 12 December 2024 update	Commentary informed by DtC activities
Mole Valley District Council	Local Plan adopted October 2024	336 Meets 75% of need against prior standard method (i.e. prior to 12 December 2024 update) which was 458 dpa	883	Adopted plan will be subject to an early review given the level of unmet need, which has increased significantly
Reigate and Banstead Borough Council	Existing Local Plan adopted 2014, reviewed 2019 and 2024. Work commenced on a new Local Plan in early 2023	460	1,306	While evidence gathering is underway, RBBC anticipate it will be challenging to meet this significantly higher housing need.
London Borough of Sutton	Regulation 18 consultation held July to September 2024	469 London Plan (2021)	1,654	LBS are gathering further evidence to identify capacity for new dwellings but anticipate there is unlikely to be capacity to meet needs from elsewhere.
Royal Borough of Kingston Upon Thames	Regulation 18 consultation held November 2022 to January 2023	964 London Plan (2021)	1,589	RBK is currently reviewing its housing land supply evidence and is anticipating that it is unlikely to be able to fully meet the standard method need or the London Plan target

Appendix 4: Extract from SA 2024

7.2.1 The following statement explains EEBC Officers' reasons for supporting **Scenario 5**:

“Providing for housing needs is a key issue, and providing for affordable housing needs in particular is a key local priority. Unmet housing need leads to a wide range of issues, at the local and wider sub-regional scale. However, the appraisal serves to highlight a range of drawbacks to higher growth, hence the plan follows a middle path, striking a balance across competing sustainable development objectives.

In particular, the appraisal serves to highlight significant drawbacks to Scenario 1, and we believe that significant weight can be attributed to these drawbacks, such that Scenario 1 is judged to perform poorly overall. There is a clear need to take steps to minimise unmet housing need as far as possible, not least because of the levels of affordable housing need that exist locally, which is a figure many times higher than the 30 homes affordable homes per annum delivery figure that the Borough has averaged over the past six years. Furthermore, minimising unmet housing need is important from wide-ranging other perspectives, including from a perspective of supporting the local and sub-regional economy and supporting the achievement of transport, decarbonisation and certain environmental objectives.

From the appraisal it is apparent that Scenario 4 also performs reasonably well, but there is clear evidence that Scenario 5 is preferable, particularly once account is taken of the precautionary nature of the appraisal conclusion under 'climate change adaptation'. Specifically, whilst Horton Farm intersects a surface water flood zone there is ample opportunity to leave land at risk undeveloped as blue / green infrastructure.

Under Scenario 4 Horton Farm is substituted for Downs Farm, but it is recognised that there is also a 'missing scenario' (omitted from the appraisal for clear reasons discussed above, in Section 6.15) whereby Downs Farm is allocated *in addition to* Horton Farm (i.e. a scenario in-between Scenarios 5 & 6). This omitted scenario would likely perform similarly to Scenario 6 (a higher growth scenario) but better than under the 'Landscape' topic heading (because it would not involve allocation of the 'southern cluster').

With regards to Scenario 3, it is difficult to see how this scenario could justifiably be supported ahead of either Scenario 4 or Scenario 5, although it is noted that one of the cluster of three sites is proposing to make a very significant area of land available for publicly accessible green infrastructure. Also, it is recognised that whilst the appraisal assumes that the cluster of three sites would come forward in combination, in practice there is the potential to allocate just one of the sites or two of the three.

With regards to Scenario 2, whilst the appraisal does not flag significant concerns other than in one respect (housing, which is a significant concern for all scenarios), it should be noted that this scenario is judged by the appraisal to perform *relatively* poorly under most of the appraisal topic headings. It is also important to emphasise a risk that this could well be seen as not representing a suitably proactive approach to providing for local housing needs. This is in context of a sub-region where unmet need is already a major issue and in the context of a Government focused on addressing the housing crisis and delivering economic growth. Alongside this, it is also important to recall that the Government has recently communicated to the Planning Inspectorate that they should reject plans that are fundamentally unsound.

Finally, with regards to the higher growth scenarios (i.e. Scenarios 6 and 7), whilst the effect would be to close the gap to LHN / reduce unmet housing need, a key issue is clearly

impacts to the Green Belt with resulting implications for wide-ranging objectives (including landscape, biodiversity and communities), plus there would be a need to allocate some sites in less accessible locations. The appraisal also recognises that there would be a risk of significant local objection such that the plan struggles to progress (or, at least, progress in a timely fashion, in the context of an urgent need to adopt a Local Plan). There is also a specific issue with one of the sites that features only under Scenario 7, namely Land adjacent to Ewell East Station, specifically that only parts of the site are in the control of the freeholder, meaning that the availability and deliverability of the wider site cannot be confirmed at the current time (and it is important that the Local Plan only commits to delivering sites where availability is confirmed).

Overall, whilst the choice between growth scenarios is challenging, in light of the discussion above Scenario 5 is considered to be justified (NPPF paragraph 35) in that it is *“an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”*.