

Examination of the Epsom & Ewell Local Plan

Inspector – C Masters (MA) Hons FRTPI

Programme Officer - Charlotte Glancy

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Dear Mr Mawer

EXAMINATION OF THE EPSOM & EWELL LOCAL PLAN 2022 -2040

1. As advised following the close of the stage 2 hearings on Thursday 9 October, I set out below a number of actions which are necessary for the examination to progress. This letter sets out my views on two particular parts of the evidence base and what should be done to address these issues of soundness. I should emphasise this letter does not attempt to address every matter in relation to the topics covered at the hearings, as these will be covered within the final Inspectors Report. I would also like to thank the Council for the proactive approach that they have taken to progressing the Plan through the examination process to date.

Discounted sites within the urban area

2. In accordance with the Framework, planning policies should identify specific, developable sites or broad locations for growth for years 6-10 and where possible, years 11-15 of the Plan. The glossary provides a helpful definition of 'developable', stating that the sites should be in a suitable location for housing development, with a reasonable prospect that they will be available and could be viably developed at the point envisaged.
3. Document HB01a is the Land Availability Assessment (LAA) dated September 2024. It comprises part of the evidence base which has informed the selection of sites to be included within the Local Plan and includes sites submitted through

the call for sites exercise in 2023. The report follows the methodology set out within the Land Availability Assessment 2022 (document HB02c) and this is identified as a 5-stage process at section 2 of the report. Appendix 5.4 of HBO1a lists a number of sites which were discounted at stage 2 of the assessment for a number of reasons including 'site not available'. However, through the hearing process, it became apparent that this definition had also been applied to sites where no response from the Councils call for sites letter was received. This process led to some 80 sites to be discounted at this stage. The Council have subsequently updated this table to identify which sites have been discounted on the basis of no confirmation of availability received from the landowner. As far as I can see, this means that 54 sites were discounted from the process solely on this basis alone.

4. Given the significant extent of unmet housing need within the borough, I request that the Council revisit these 54 discounted sites and repeat the stage 2 assessment exercise undertaken to see if any of these sites could fall within the definition of developable as identified by the Framework. I recognise that a majority of these sites are small urban sites however this is not the case for all of the sites discounted.
5. This exercise should include, where appropriate, contacting the registered owner of the site and/or land promoter and the Councils' assessment as to whether the site is within a suitable location for housing. Given the potential contribution that some of these sites could make to housing delivery within the borough, I am not satisfied that the plan currently makes as much use as possible of suitable brownfield sites and underutilised land. I would be grateful if the Council could provide me with an indicative time estimate for undertaking the above exercise.

Green Belt work to date

6. The Plan is supported by a number of Green Belt reports within the evidence base. These include Epsom & Ewell Green Belt Technical Note 2023 (GB02), the Green Belt Study Update 2024 (GB01) as well as the Green Belt Exceptional Circumstances Topic Paper December 2024, TP02. Through this evidence, the Council have concluded that exceptional circumstances exist to justify amendments to the Green Belt boundaries in accordance with paragraph 145 of the Framework. The reasons for this are set out within the Topic Paper TP02 and I do not intend to repeat them here. Notwithstanding the additional work I have outlined above, in light of the factors which have been set out within the evidence base, and in particular the significant amount of unmet housings need

which would exist if the Council did not take this course of action, I consider this is a justified approach.

7. TP02 builds on the work of GB01 which assesses 53 parcels of land in terms of meeting the purposes of the Green Belt. TP02 carries out a site-specific exceptional circumstances assessment in the context of the nature and extent of harm to the Green Belt and provides a recommendation in relation to individual sites in terms of whether exceptional circumstances exist which would justify the release of the site from the Green Belt. Through this assessment, the Council have identified 5 sites within the Green Belt which would deliver 1580 dwellings. This approach still leaves a significant shortfall in providing for the housing needs of the borough over the plan period. As submitted, the Plan as would result in a 5500-dwelling shortfall against the standard method.
8. During the Matter 4 hearing session, it became clear that there are a number of shortcomings in relation to TP02. These shortcomings relate to the assessment of the individual sites for release in relation to the criteria the Council have identified. Specifically, a number of the conclusions drawn are inconsistent with the evidence presented, the extent to which mitigation measures have and have not been taken into account in relation to individual sites is neither clear or consistent, there are errors in the way individual sites have been assessed and I also have concerns regarding the consistency of approach to the individual site assessments contained within the document. As a result, I am unable to conclude at this stage whether the Council have done enough through this exercise to address the acute housing needs of the borough.
9. In order to address this, we agreed that the Council should revisit this part of the evidence base to ensure that all of the sites contained within the report have been assessed in a consistent manner, in accordance with the methodology identified within the evidence. The Council have commenced preparation of a note which will identify the scope of this update and this will be published on the examination webpage in due course. Once this has been done, I would be grateful if the Council could provide me with an indicative timeframe for the completion of this work.

Other Matters

10. The Council are in the process of producing a list of other action points which were identified during the hearing sessions and once I have had sight of this, it will be placed on the examination webpage.

Next Steps

11. I hope the Council is clear on the matters outlined above which need to be addressed and the way forward I have identified. If there are any matters which you are not clear on and would like to discuss then do please advise the Programme Officer. I am not inviting comments from other parties on this letter or the content however a copy of this letter should be published on the examination webpage as soon as possible.
12. Once the above work is complete, and subject to the findings of this additional work, I will be in a position to assess what main modifications maybe necessary to make the plan sound. This may require an additional hearing session and should this be the case, I will liaise with the Programme Officer accordingly.

Yours sincerely

C Masters

Inspector