

**Proposed Submission Epsom and Ewell Local Plan
(2022-2040)
Local Plan Examination**

Matter 3 – Vision and the Spatial Strategy

Hearing Statement prepared on behalf of
Taylor Wimpey Strategic Land

September 2025

Contents

1.	Introduction	1
2.	Matter 3: Vision and Spatial Strategy	2

Client
Taylor Wimpey Strategic Land

Our reference
02496_PLESE

September 2025

1. Introduction

- 1.1 This Matter Statement has been prepared on behalf of Taylor Wimpey Strategic Land and in respect of Matter 3 of the Proposed Submission Epsom and Ewell Local Plan (2022-2040) Local Plan Examination (herein after referred to as the '*Reg 19 Local Plan*'). Matter 3 deals with Vision and Spatial Strategy.
- 1.2 Taylor Wimpey Strategic Land has submitted formal representations to the Reg 19 Local Plan.
- 1.3 The Statement has been prepared in response to the specific issue (Issue 4) raised by the Inspectors in the '*Matters, Issues and Questions*' published on 9th July 2025, namely '*Is the plans approach to the vision and spatial strategy justified, positively prepared and consistent with national policy?*'
- 1.4 This Matter Statement responds to the Inspectors' questions and has been considered in the context of the tests of 'Soundness' as set out at Para 35 of the National Planning Policy Framework (December 2023).
- 1.5 The NPPF December 2024 has recently been published. The transitional arrangements set out in paragraph 234 confirm circumstances where an emerging Local Plan will be determined against the December 2023 NPPF. This includes where the Plan has been submitted for examination under Regulation 22 on or before 12 March 2025. This does apply in the case of the Reg 19 Local Plan. The references to the NPPF therefore relate to the December 2023 version.
- 1.6 These require that a Plan is:
 - Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

2. Matter 3: Vision and Spatial Strategy

Issue 4: Is the plans approach to the vision and spatial strategy justified, positively prepared and consistent with national policy

Q4.1 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?

- 2.1 The plan period extends from 2022 until 2040. Paragraph 22 of the NPPF requires that 'Strategic policies should look ahead over a minimum 15-year period from adoption'. The Local Development Scheme (December 2024) (document reference SD06) anticipates adoption in April 2027, following completion of the Examination in July. It is noted that the Examination has been arranged during August, September and October, and that it does not include any reference to or seemingly any allowance for Proposed Main Modifications and related consultation.
- 2.2 Even if it were assumed that April 2027 was an appropriate timescale for adoption, this would not accord with the requirements of paragraph 22, as it would only represent a 13-year plan period. The plan cannot be considered to be consistent with national policy, justified or has been positively prepared on this basis. The Reg 19 Plan should be extended by at least another 2 years to 2042.
- 2.3 The related additional housing requirements that would arise as a consequence provide further evidence that the Council should be planning more positively to deliver against the housing requirement, by applying greater flexibility in the approach to density and capacity of proposed allocations and/or identifying additional allocations.

Q4.2 The Plan period starts from 2022. What is the justification for this and should it align with the submission dates?

- 2.4 My client can find no justification for starting the plan period in 2022. Neither the Reg 19 Local Plan nor key supporting evidence base documents, including the Spatial Strategy Topic Paper (TP07), provide any reference to the rationale for this approach, or indeed how this can be justified given the consequent 13-year plan period and conflict with paragraph 22.
- 2.5 The only brief reference and justification is included in paragraph 2.36 of the Sustainability Appraisal (SD 05a and b) (SA). In relation to considering housing requirements the SA notes that:

'However, there is also the question of what the housing requirement is for the plan period which, in turn, relates to the question of the plan period itself. In this regard, whilst the preferred approach is a plan period running to 2040, it is acknowledged that the plan period might ideally be extended by a further year, in light of NPPF para 22, which in turn would mean that LHN for the plan period increases by 569 homes. However, there are clear arguments for a plan period running only to 2040 in the specific context of this Local Plan. One consideration is that the nature of the Borough is such that there are few large-scale strategic growth options that would still be delivering homes in 2041, and otherwise few options that would still be delivering homes at this time.' (our underlining)

- 2.6 This at least acknowledges the conflict with paragraph 22, but the only justification for the plan period relates back to the nature of the Borough, by which it is assumed the level of constraints that exist, and the lack of large-scale strategic growth options.
- 2.7 The only possible exception that is referenced in the paragraph 22 requirement to consider a plan period of a minimum of 15 years from adoption relates to Plans that focus on town centre redevelopment sites only, but even then it refers to a minimum of 10 years. This is not the case with the Reg 19 Plan which includes greenfield sites as part of the housing delivery. Equally, the level of constraints within the Borough, as implied, is irrelevant to the consideration of a minimum 15-year plan period.

Q4.3 Does the key diagram on page 24 of the Plan represent the key diagram as required by paragraph 23 of the Framework?

- 2.8 Paragraph 23 of the NPPF requires that '*Broad locations for development should be indicated on a key diagram, and land use designations and allocations identified on a policy map.*' The key diagram utilises very broad annotations to identify locations for housing, employment, gypsy/traveler sites and sport land uses. The policies map does include more specific boundaries for overall allocations. However, neither provides a clear steer as to the expected extent of different land uses within some allocations.
- 2.9 By way of example, the allocation at Policy SA34 (Hook Road Arena) proposes both a sports hub and 100 residential dwellings. However, the key diagram simply shows a circular annotation identifying the Sports Hub to the north-west and residential to the south-east, and the policy map only a red line around the site.
- 2.10 The key diagram and policies map should be amended to better define the locations for different land uses within allocations. As set out within the Matter 2 Statement submitted on behalf of our client, in respect of Policy SA34 this should include a review of the opportunities and constraints within the site in the context of more positively addressing housing requirements.

Q4.4 Is the Plan clear which are the strategic policies of the Plan? The Councils response to my initial letter (COUD_001) identified that the Plan could be more explicit in this regard and the Council have identified which policies they are identifying as strategic and non-strategic policies. Is this list correct?

- 2.11 My client has no comments on this question.

Q4.5 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.

- 2.12 Paragraph 8 of the NPPF relates to the three overarching objectives of sustainable development: economic, social and environmental. The social objectives includes supporting a '*strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.*'
- 2.13 Whilst recognising the significance of the environmental constraints that exist within the Borough, most notably the sites of special scientific interest, flood risk and more significant heritage interest (scheduled ancient monuments), these relate to specific

areas within the Borough. In addition, though all of the Borough outside the built-up area is Green Belt, in accordance with the NPPF paragraph 145-147, the Plan does provide an opportunity to review boundaries in exceptional circumstances. This can include addressing housing requirements and my client welcomes the approach of the Reg 19 Plan in proposing Green Belt releases to assist with this.

- 2.14 However, given the extent of shortfall against the housing requirement that still remains, it is considered spatial strategy does not appropriately balance the sustainable development objectives, giving too much weight and emphasis on environmental objectives at the expense of social objectives, specifically the delivery of market and affordable housing to meet needs.

Q4.6 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?

- 2.15 Paragraph 1.35 of the Housing and Economic Needs Assessment (Document reference HB03) identifies a net need for 652 affordable homes per year from 2022 to 2040, including 574 rental properties (88%) and 78 affordable home ownership properties (12%). The Assessment also recognises that shared ownership may offer improved viability relative to social rent (paragraph 1.40).
- 2.16 The Reg 19 Plan highlights the significance of the affordability issue within the Borough. Paragraph 1.36 concludes that *'Epsom is one of the least affordable places to live in Surrey when comparing median household incomes to median property prices. The housing affordability ratio in the borough was 16.8 in 2023.'*
- 2.17 Policy S6 requires 40% affordable housing on all greenfield sites, and 30% elsewhere, where 10 or more houses are being delivered. However, the significant shortfall in meeting housing requirements being planned within the spatial strategy will have a consequential effect on the delivery of affordable housing, regardless of the policy position. The limited release of greenfield sites and reliance on windfall will exacerbate this shortfall.
- 2.18 The required proportion of affordable housing in Policy S6 is considered reasonable and based on sound evidence. My client welcomes the cross reference to Policy S2 relating to 'Sustainability and Viability' and the submission of a viability study where necessary to support proposals that do not meet policy requirements.
- 2.19 However, the restriction to provision of off-site provision of affordable housing only in exceptional circumstances is unduly onerous. This would still deliver affordable housing and can be linked to a suitable legal obligation. It should not be compared with an off-site financial contribution in this respect. This greater flexibility will assist in delivering affordable housing and better respond to site circumstances. Policy S6 should be updated accordingly.

Q4.7 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 Governments 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?

- 2.20 The significant shortfall does not support this approach. As set out in the Matter 2

Statement submitted on behalf of our client, a more balanced spatial strategy with an appropriate greater emphasis on aligning with this objective and meeting a greater proportion of housing needs is necessary.

Q4.8 In what way will the proposed strategy deliver the mix of homes needed and is the Plan positively prepared in this regard?

- 2.21 In relation to housing mix, paragraph 1.44 confirms that there is expected to be an increase in the number of households with dependent children, especially with three or more children, and therefore it is reasonable to expect continued strong demand for 3+ bedroom homes. Table 2 of the Assessment includes a recommended housing mix for both market and affordable housing, which reflects the demand for family accommodation. Policy S5 of the Reg 19 Plan reflects this mix, and my client supports this and the recognition that it also has regard to the size, characteristics and location of the site.

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