## When a meeting is not a meeting, in brief.

The vexed issue of whether a "members' briefing" is a "meeting" or not has received some attention of late. Anxiety was aroused by fears that a "confidential" meeting of **Epsom and Ewell** Councillors might effectively determine whether Green Belt land would remain in the Local Plan as potential sites for housing development. The "meeting" on 10th January was "met" by a small group of protestors who had caught wind of the event.

According to Cllr. **Alison Kelly** (LibDem Stamford) "I did tell a friend that I was going to a member's briefing. I didn't realize that I was not to disclose that. I just gave that out because a friend asked me why I can't come out. I don't understand why they cannot be publicly declared as meetings."

She revealed this at the meeting of the Strategy and Resources Committee of 25th January. This was a meeting and the press and public were allowed in as usual. During a debate about the Council's new "Communication Strategy" Cllr Kelly also said: "we've recently faced accusations over secrecy with response to the Local Plan Green Belt members briefings and some legal guidance; we've also been asked to remain silent on some matters including the existence of a briefing meeting and we seem to have had quite a lot of part two sessions [sections of Council meetings that are closed to the press and public]. How does this strategy help us to address the issue of secrecy levelled at us by the residents?"

In response RA leader Cllr **Hannah Dalton** (Stoneleigh) said: "The purpose of member briefings is for members [i.e., councillors] to be informed and in a safe and confidential space to ask questions, to understand information, to obtain data from officers, whether from our council or other councils or the LGA [Local Government Association] or whomever. To then provide a steer to... what then comes to committee."

The Council's law officer advised: "I don't think there's problem actually saying that you're coming to a council briefing. If you went further to say I'm coming to a council briefing on xxx subject then that is disclosing at times confidential information."

Cllr **Steven McCormick** (RA Woodcote and Langley Vale) told the Epsom and Ewell Times 15th January: that the 10th January "members' briefing", "...was not a secret meeting; it just wasn't a public meeting. I stated publicly at the September LPPC Committee and extraordinary full Council on 24 October 2023 that Member briefings regarding the Local Plan would be taking place during this time period assuming the local plan was unpaused by full council, which it was."

Epsom and Ewell's Member of Parliament **Chris Grayling** has weighed in and on 31st January told constituents: "The Council has now decided to press ahead with its plans, and while details of the updated proposals remain confidential, I understand from Councillors in the ruling group that they continue to include substantial green belt development in the area. This is despite the fact that existing brownfield sites can deliver most of what is needed."

He urged residents to make their views known to the Council.

Related reports:

Councillors belted-up on Green Belt?

Mystery Local Plan critic revealed

Image: Cllr Alison Kelly at the Strategy and Resources Committee meeting

## Minister gets heavy on a Local Plan delay

A Surrey borough where the house prices are "amongst the highest in England" has been ordered not to delay its home building programme. The Epsom and Ewell neighbour borough of **Mole Valley District Council** was ready to pull the plug on its planning bible – which sets out the development it would allow to meet its housing targets.

The council was to debate informing the planning inspector of its decision to withdraw its draft local plan but a last minute intervention by the Department of Levelling up, Housing and Communities has ruled this out. Instead the council agreed to continue working to set out clear guidelines for developers.

In a letter to the council outlining his decision, **Lee Rowley, Minister of State for Housing**, Planning and Building Safety, said: "I am writing to you over concerns that Mole Valley District Council may withdraw the emerging local plan from examination. The Government is clear that local plans are at the heart of the planning system, and it is essential that up-to-date plans are in place

and are kept up to date."

He said: "Each local planning authority must identify the strategic priorities for the development and use of land in the authority's area, and policies to address those priorities must be set out in the local planning authority's development plan documents such as the local plan."

The last time the council had an up-to-date plan was in 2009 and work on its replacement has begun in earnest. Withdrawing now, Mr Rowley said would extend the council's time in limbo. He said: "Withdrawing the plan from examination would be a clear failure by the council."

Since Mole Valley District Council's last masterplan, more than 90 per cent of all English local authority plans have been updated – pulling out now would leave the borough with "one of the oldest adopted local plans in the country". It has left the council operating under out-of-date policies, given the amount of change in the 14 years since it was adopted.

Mr Rowley added: "Housing affordability is a significant problem in Mole Valley and the ratio of average house prices to average wages is amongst the highest in England. I can therefore conclude that there is higher housing pressure. Considering the average time taken to prepare a local plan is seven years and we are approaching the phased introduction of a new planning system, withdrawing the plan at this stage could only lead to significant further delay whilst a new plan is prepared. Intervening would therefore accelerate plan production given the current plan is submitted and at examination."

The order to proceed with the plan will remain in force until formally withdrawn by the secretary of state.

Councillor **Margaret Cooksey**, Cabinet Member for Planning said: "The Minister of State for Housing, Planning and Building Safety has today [January 25] issued Mole Valley District Council with a direction not to withdraw its local plan from the examination-in-public at the Council meeting tonight. Previous to the new direction, three options had been available to MVDC: Withdrawal of the plan; continuation of the plan, as submitted (including Green Belt sites); request that the planning Inspector change the plan to remove all Green Belt sites.

"This new direction takes option A away from us and requires Mole Valley District Council to report monthly to the Minister's officials on the progress of the examination. It will remain in force until the examination concludes with the Inspector's report."

# **Mystery Local Plan critic revealed**

Epsom and Ewell Times reported in full the speech from a member of the public at the Licensing, Planning and Policy Committee (LPPC) of 22nd November 2023. He addressed Councillors forcefully on a response to the Government's revised National Planning Policy Framework (NPPF). See report here.

Undeterred the gentleman appeared again at the Thursday 18th January meeting of the LPPC. Cllr. **Clive Woodbridge** (RA Ewell Village) asked Chair Cllr **Steven McCormick** (RA Woodcote and Langley Vale) to identify the speaker. As far as we could tell his name is John Seaston or Seaton.

Following the private "members' briefing" of 10th January about the Local Plan, reported in the Epsom and Ewell Times HERE, there was anticipation that something would be said in public about that meeting on Thursday. Nothing was said.

The only contribution about the Local Plan was the three minutes Mr Season/Seaton was permitted. Again, our transcript of his address is published in full. Epsom and Ewell Times invites corrections and responses to his opinions.

"Last year, this Council voted to pause the Local Plan process. In order to buy time to base its regulation 19 Local Plan on Government's revised NPPF. The great news is that this pause strategy worked. The critical thing now is to take full advantage of the opportunity that you have created. To do this, you need to be very clear about the changes to NPPF that Government has made.

There are two very important points that you must fully understand. First point: Government has clearly stated that the standard method calculation just gives an advisory starting point. When I spoke to you at the start of your last meeting, I emphasized how Government has used its standard method to set a negotiation anchor. Government has now admitted that its anchor is not credible. So it has rebranded it as an advisory starting point. It is critical that all councillors and officers involved in a Local Plan process fully understand that there is nothing binding about the standard method number.

You do not need to meet this target in full. You do not even need to meet half this target. You do not have to meet any specific proportion of this target. You just need to meet the actual needs of our borough.

Second point: Paragraph 145 of the new NPPF states there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. That was a direct guote from NPPF.

Could government have been any clearer? In case you missed it, there is no requirement for Green Belt boundaries to be reviewed or changed. I have highlighted during previous LPPC meetings that this Borough can fully meet its actual housing need over the plan period using only brownfield sites and previously developed land within the Green Belt.

In the Regulation 18 Local Plan, Council used the brownfield sites shortfall versus government's anchor to declare the exceptional circumstances required to alter Green Belt boundaries. The two changes to NPPF that I have just highlighted together with the quantum of brownfield and previously developed sites available in the Borough make this declaration of exceptional circumstances and resulting changes of Green Belt boundaries unjustifiable.

It would not be consistent with achieving a balanced Local Plan which meets Council's legal duty to achieve biodiversity net gain and a credible local nature. Any proposals to change Green Belt boundaries in the regulation 19 Local Plan would expose Council to legal challenge. And the associated cost and programme overruns as well as angering the residents you are supposed to serve."

#### Related reports:

Local Plan costs eat into Council reserves

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Local Plan (2022-2040) Un-Pause Recommended

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and many many more. Search "local plan" in search function above.

Image: Clockwise from Chair: Cllrs - Steven McCormick (RA), Peter O'Donovan (RA), public speaker (Seaston / Seaton), Keiran Persand (Con), Julie Morris (LibDem), Clive Woodbridge (RA), Phil Neale (RA), Steve Bridge (RA), Council

## Councillors belted-up on Green Belt?

In a recent closed-door meeting held at the Town Hall, local councillors in the Borough of Epsom and Ewell, convened to *apparently* deliberate on potential areas for housing development, with a particular focus on the contentious issue of Green Belt land. The meeting, held on January 10, has stirred controversy and prompted reactions from concerned citizens, leading to a series of letters and press releases. Councillors were greeted at the entrance by a small and polite protest group.

**Yufan Si**, a prominent Green Belt campaigner, has expressed alarm over the secrecy shrouding the meeting. The council's decision to discuss Green Belt development in a closed setting has raised questions about transparency and adherence to government policies.

Ms Si highlights the Council's statistics, indicating that 84% of residents opposed development on Green Belt land during a prior consultation. The campaigner argues that the government's planning policies offer a choice to protect Green Belt areas, questioning the need for a clandestine discussion.

She has raised concerns about the council's sale of Green Belt land to a local business owner three years before the Local Plan's development, potentially leading to significant financial gains. The campaigner emphasizes the availability of brownfield sites capable of accommodating over 3,700 new dwellings, surpassing the projected household growth from 2022 to 2040. In her letter Yufan Si has urged councillors to prioritize environmental preservation and fulfill residents' wishes by excluding Green Belt land from the development plans.

Councillor **Julie Morris** (LibDem College) has stated that she challenged the decision to keep the meeting private. While acknowledging the legal standing of the private meeting, Councillor Morris called for greater transparency and public engagement. She emphasizes the need for progress reports on the Local Plan to address residents' concerns and combat misinformation circulating in the public domain.

She said "The ruling Residents Association party would do well to engage directly with the public on this matter, or at the very least, to explain exactly why these meetings are being held, have to be in private, and why there is no public statement after each meeting to keep local residents informed as to how things are moving forward. Our residents deserve no less than this."

Letters from concerned citizens to Councillors echoed the sentiment against Green Belt development. **Stephen Neward**, a voluntary warden at the Priest Hill nature reserve, expressed hope that the revised National Planning Policy Framework would prevent the inclusion of Green Belt sites in the Local Plan. Another resident, **Lynn Munro**, urged councillors to prioritize brownfield sites over Green Belt, emphasizing the irreversible impact on the borough's open spaces.

**Tim Murphy**, representing the Council for the Protection of Rural England and the Epsom and Ewell Green Belt Group, shared the views of planning consultant Catriona Riddell. Riddell clarified that local authorities, including Epsom and Ewell, are not obligated to alter Green Belt boundaries to meet housing targets, challenging the notion that Green Belt sacrifice is necessary.

As controversy swirls around the closed meeting, residents, campaigners, and opposition councillors continue to press for transparency. The fate of Green Belt land in Epsom and Ewell remains a hot topic.

The meeting was not notified on the Council's calendar of meetings and therefore the press do not know if it was a formal or informal meeting nor whether any order was made about publicity. No part of the meeting, including any section excluding the public, has been uploaded to the Epsom and Ewell Borough Council YouTube channel.

Cllr **Steven McCormick** (RA Woodcote and Langley) Chair of the Licensing, Planning and Policy Committee has responded to Epsom and Ewell Times:

"This was not a secret meeting; it just wasn't a public meeting. I stated publicly at the September LPPC Committee and extraordinary full Council on 24 October 2023 that Member briefings regarding the Local Plan would be taking place during this time period assuming the local plan was unpaused by full council, which it was.

Further clarification was given at the special LPPC meeting held in November when the Local Development Scheme (LDS) was an agenda item. I have given a statement at every council meeting allowing questions from all members. All members have been encouraged to attend each LPPC meeting whether they're a committee member or not. All members have been fully involved and engaged in the development of our local plan.

It is normal and expected practice when a Local Plan is being developed for Members to be able to discuss items of detail outside of the public Committee Meetings. The information briefing for councillors held on 10 January 2024 was not a meeting of the Council or a committee and had no decision-making powers, and there was no right for public access under the Local Government Act 1972 or any other legislation.

There is currently a huge amount of work being done for our Local Plan, including considering the implications of the revised NPPF published in December 2023. Work will continue over the coming months before the next stage of public consultation (Regulation 19), which is due to commence in January 2025, if supported by LPPC in November 2024 and full council in December 2024."

#### Related reports:

Local Plan costs eat into Council reserves

Local Plan to move forward after passionate debate

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## **East Street Development gets Green Light**

At the Epsom and Ewell Planning Committee meeting of 14th December the proposed demolition of 79-81 East Street and the construction of a part 5, part 6 storey building containing 31 residential units faced intense scrutiny and debate.

After a heated discussion, Councillor Neil Dallen (RA Town Ward) proposed to refuse the application, citing concerns about over development, lack of parking provision, and harm to the conservation area. The proposal was seconded by Councillor Jan Mason. However, the committee ultimately voted against his motion (2 For, 6 Against).

Following further consideration, the Acting Chair put forward the Officer's recommendation for approval, subject to conditions and a legal agreement. The committee resolved (6 For, 2 Against) to grant planning permission with conditions and informatives.

Conditions and Informatives: The approval is subject to a Section 106 Legal Agreement, including provisions for 16 affordable rented units, restrictions on parking permits, and a car-club agreement. Conditions include time limits for development commencement, approval of external materials, construction transport management plan, and various pre-occupation and post-development requirements.

The decision reflects the complex considerations surrounding the East Street Development. The approved conditions aim to address concerns raised during the meeting, particularly regarding parking, sustainable transport, and environmental impact. The development now moves forward, albeit with strict guidelines in place.

## Ruxley Lane development on casting vote

Properties on Ruxley Lane in Ewell with sizeable gardens will be demolished and replaced by 14 dwellings in two blocks. A tied vote of Councillors, at the Epsom and Ewell Planning Committee meeting of 14th December, on granting permission was resolved by the casting vote in favour of acting Chair Cllr Steven McCormick (RA Woodcote and Langley).

The committee approved the application, contingent upon the execution of a Section 106 Legal Agreement. This agreement includes a viability review mechanism to be activated if the development fails to reach the first-floor slab level on both buildings within 20 months of the decision date.

A critical provision in the decision is the requirement for the Section 106 Agreement to be completed by March 18, 2024. Failure to meet this deadline empowers the Head of Place Development to refuse the application based on non-compliance with Policy CS9 of the Core Strategy 2007.

Several conditions were imposed, including a three-year time limit for the commencement of development to comply with the Town and Country Planning Act. The approved plans, covering aspects such as site location, construction details, and landscaping, must be strictly adhered to throughout the development process.

Pre-commencement conditions were also established, such as the submission and approval of a Construction Transport Management Plan, ensuring responsible construction practices and adherence to highway safety regulations.

Post-demolition and pre-above-ground conditions mandate the submission and approval of details related to external materials, access provisions, tracking details, sustainable drainage schemes, and more. These conditions aim to safeguard visual amenities, highway safety, and sustainable development principles.

Pre-occupation conditions cover various aspects, including access closure and remediation, parking and turning layouts, visibility splays, and the installation of electric vehicle charging points. These conditions align with the National Planning Policy Framework's sustainable transport objectives and local development policies.

The committee emphasized sustainability measures, requiring the provision of solar panels, drainage verification reports, and adherence to ecological and sustainable design measures.

During and post-development conditions focus on groundwater remediation strategies, tree protection, ecological considerations, and sustainable design measures. The approved development must comply with strict regulations to control significant harm from land contamination and ensure the preservation of biodiversity.

The decision also outlines specific conditions regarding construction hours, limitations on additional windows or openings, and the installation of facilities such as refuse/recycling stores and cycle storage.

# Ewell derelict site gets development go-ahead

14<sup>th</sup> December 2023 Epsom and Ewell planning committee granted planning permission for a proposed development on the Ewell-By-Pass / London Road site. The application has come before the committee several times before and now has the go ahead. The plan involves construction of a three to five-storey building plus basement for use as a care home with up to 81 bedrooms and

associated communal spaces and services, together with associated car and cycle parking, refuse storage and ancillary works.

Permission was granted subject to an extensive Section 106 Agreement. An agreement where the developer gives money to the Council for related development in the area. The agreement includes various Heads of Terms aimed at enhancing local infrastructure and ensuring compliance with planning policies.



The agreement involve provisions for bus stop infrastructure improvements, push-button controlled pedestrian crossing facilities, and the establishment of a 3-meter wide footway along specified frontages. Additionally, a Travel Plan Auditing fee of £6,150 has been stipulated.

The agreement specifies that if the Section 106 Agreement is not completed by June 14, 2024, the Council can refuse the application, citing non-compliance with key planning policies.

Several conditions have been imposed to regulate the development, including a stipulation that construction must commence within three years of the permission date. Details of external materials, a Construction Transport Management Plan, and a Car Park Management Plan must be submitted and approved before the initiation of construction.

Other conditions address aspects such as the provision of EV charging, pedestrian visibility zones, cycle parking facilities, and a Surface Water Drainage Scheme complying with national standards.

Furthermore, the development must adhere to specific noise control measures, internal noise criteria, and contamination risk management schemes. The planning committee has also mandated the closure of existing accesses, the laying out of parking and turning spaces within the site, and the implementation of measures to safeguard against unexpected contamination during development.

The approved plan emphasizes sustainable development objectives, highway safety, and adherence to national planning policies. The local planning authority has taken a comprehensive approach to ensure the proposed development aligns with visual amenities, character, and safety standards outlined in the Core Strategy (2007) and Development Management Policies (2015).

The developer must comply with these conditions to ensure the project aligns with national planning policies and local community interests.

The councillors voted 5 in favour and 3 against.

Related reports:

Care home plan lacked the "wow" factor

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### Green Belt off or relaxed a notch?

Excitement has been stirred by **Michael Gove**'s announcement 19th December that housing targets are advisory not mandatory. This change *may* mean a shift in **Epsom and Ewell**'s Draft Local Plan away from earmarking any Green Belt for housing developments.

The local campaign group **Epsom and Ewell Green Belt** has reacted to the news. In a press release issued today they urge **Epsom and Ewell Borough Council**: "Together with the Surrey Branch of the **Campaign to Protect Rural England** (CPRE), is calling on the Council and its Councillors to instruct the planning officers to republish its Local Plan within the next few weeks, removing all greenbelt sites, reducing the housing target to a rational approximately 3,500 homes for the Plan period, and focusing on developing all available brownfield sites. We have produced a list of the changes that would need to be made to the draft Plan so that it complies with the Government's revised National Planning Policy Framework (NPPF)."

However, accompanying the publication of the revised NPPF Secretary of State for Levelling up, Housing and Communities Michael Gove said "The new NPPF was not a route to the evasion of responsibilities. Local authorities must provide rigorous evidence justifying their departure from assessed housing needs. They must do everything to identify other lands suitable for development." He added "While the planning inspectorate will respect well-made cases, it will not accept undershooting that is not firmly rooted in environmental or other safeguards. This is about sensitive adjustment in housing targets, not their abandonment."

#### Related reports:

Green Belt development objections excluded

Public meeting on Local Plan dominated by greenbelters.

Green-belters belted up and beltless

Green-belters seeing red on Local Plan?

and many more - search "Local Plan".

### Local Plan costs eat into Council reserves

An officers' report to the Council advised a further £629,000 is required to progress the Local Plan 2022-2040. The matter was considered by Epsom and Ewell Borough Council's Strategy and Resources Committee Tuesday 13<sup>th</sup> December.

The report provided an update on the financial position on advancing the Local Plan toward submission and subsequent adoption, aligning with the timelines outlined in the recently published Local Development Scheme (November 2023). Following a public consultation on the draft plan earlier this year, an extraordinary Council meeting in March 2023 decided to temporarily halt the Local Plan. It was subsequently resumed in October 2023, accompanied by an updated timetable.

The financial crunch, estimated at £629,000, revolves around progressing the plan to Regulation 19 and concluding the Local Plan Examination. To address this, the Licensing and Planning Policy Committee recommended allocating £629,000 from the Corporate Projects Reserve. However, this move comes with significant financial implications, as it would reduce the reserve balance from £2.98 million to £2.35 million. If an additional request to use this reserve, hinted at in reference to a matter concerning the Council's commercial property – which was excluded from public and press scrutiny, is approved, the balance would further decrease to £1.85 million.

The item from which the press and public was excluded concerned drawing half-million pounds of taxpayers' money from the Council's reserves - we quote from the Local Plan item in public view:

"Should the separate request to use this reserve at Agenda item 4 also be approved, the reserve balance will further decrease (from £2.35m) to £1.85m." The ground of exclusion was to protect financial information of third parties. Do you think such interests should out-weigh taxpayers' interests in what might justify £1/2 million being taken from reserves? Write to Epsom and Ewell Times.

The Council is facing a projected revenue budget deficit of £1.1m from 2024/25 (as reported to Strategy & Resources Committee in July 2023) and reserves are likely to come under substantial pressure in future years and may fall below the recommended level of £1 million.

The officers' report underscored the importance of maintaining staffing levels and securing external technical support to ensure a robust and timely Local Plan. Any deviation from the Local Development Scheme could amplify costs and resource implications. Despite the financial challenges, the Council was urged to use existing in-house resources wherever possible, given the projected revenue budget deficit.

Cllr **Alison Kelly** (LibDem Stamford) queried whether it was necessary to extend officers' contracts to 2026 when the Local Plan is to be submitted in 2025. The Council was advised that the opportunities for legal challenges and so forth would extend to 2026 and therefore they needed to budget for extending officer employment contracts by two years.

Cllr **Robert Leach** (RA Nonsuch) vented his frustration thus: "I probably have to support this recommendation, but I should do so with gritted teeth. This local plan just seems to be a bottomless pit. I understand that it has cost one and a half million pounds already, and that's probably only half the amount that we will waste. In my opinion, it is a waste of £3 million when the whole project of coming up with a local plan and planning applications could be done more simply. This filled me with horror.

In a recent RA meeting, I pointed out that this worked out at £50 for every household in the country. I asked the people there to put their hands up if they were happy for £50, which is, in effect, their money, to be spent on producing this rather than having £50 to spend on food and energy bills. The number of hands that went up, in round numbers, was a round number. The residents, I think, share my view that we are just wasting money.

I realize that we have to meet a legal obligation, and I would certainly never advocate that the council breaks the law. But I think we should point out that this is being imposed on us by central government. They provide us with no grant at all, apart from perhaps a few specific pet projects of their own. While we have to carry on with the local plan, we should make it clear that we do so reluctantly, only because the law forces us to do so, and that we should make clear to our residents that central government is the villain in this pantomime.

The present government is about to announce a new planning policy. If we have a general election next year with a Labour government, they have said that they will just ride roughshod over local authorities. I shall support the motion, and I shall do so with great reluctance."

Following these two contributions from the Chamber the committee proceeded to unanimously accept the recommendation to draw £629,000 from reserves to fund the ongoing Local Plan process.

The contribution to the prolongation and additional cost of the Local Plan process arising from the unpopularity of the original draft's proposals to develop Green Belt was not mentioned by any Councillor.

#### Related reports:

Local Plan to move forward after passionate debate Local Plan (2022-2040) Un-Pause Recommended Cllr Persand intervenes ahead of Local Plan debate and many many more (search "Local Plan")

## Anchored in reason on local housing need?

The Draft Local Plan lacks a proper negotiating position on future house building numbers in the Borough of Epsom and Ewell. So said an unnamed member of the public who addressed last week's Licensing, Planning and Policy Committee.

Let Epsom and Ewell Times know your view. Is he right or wrong? Here is his speech in full:

"Good evening, everyone. The first thing they teach you about negotiations at business school is the power of anchoring. Government has deployed this tactic very successfully. Government's standard method results in a target of 10,368 new dwellings over the Local Plan period. Let's be clear: this target is government's negotiation anchor. It is not our borough's actual housing need; it is simply designed to pressure you into setting a high housing target.

You might not realize that you are in a negotiation, but you are. Although the draft Local Plan recognizes that government's target is unachievable, it has still succeeded in anchoring council's thinking throughout the Local Plan. First, you note that your 3,700 from brownfield sites only meet 36% of government's anchor. Then you use that fact to declare exceptional circumstances. Afterward, you set your own housing target at just over half of government's anchor. That is the classic response of an inexperienced negotiator.

What the draft Local Plan did not discuss was our actual need for new dwellings. Strategic plans should always be based on the best available information, and yet the draft Local Plan did not even mention our actual need for new housing. It is very important for the council to prominently and clearly explain within the Local Plan why government's anchor of 10,368 is flawed and why our actual housing need is for just 2,664 new dwellings. By doing this, you will demolish government's anchor and replace it with the council's own anchor. It is absolutely critical to anchor everyone's thinking to the real needs of our borough.

The figure of 2,664 new dwellings is obtained by making just two changes to the standard method: firstly, replacing the outdated 2014 household projections with the more up-to-date 2018 data, and secondly, removing the flawed 40% affordability uplift. The theory behind this uplift is that by flooding the market with new homes, you will drive prices down. This theory is flawed for two reasons: firstly, house builders engage in land banking; they hold back most of their consented land and drip-feed new houses onto the market at a rate that matches demand and maintains prices. Secondly, the affordability uplift assumes that Epsom is a separate market for housing—it is not. If the Competition and Markets Authority were to look at this, the first thing they would do would be to define the relevant markets. They would note the existence of an unbroken chain of substitution across the whole Greater London Commuter Zone and conclude that Epsom just forms a very small part of a very large market. Flooding with new homes will not reduce house prices in the borough due to any supply-demand imbalance. Any reduction in local house prices will be as a result of the borough becoming a less serene and less attractive place to live.

According to paragraph 1.61 of the draft Local Plan, the balance between protecting our environment and enabling development is at the centre of our spatial strategy. At present, the Local Plan is unbalanced. You are planning to build more than twice the number of new dwellings that we actually need by sacrificing some of our best-performing Greenfield Green Belt sites."

Related reports:

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MP's housing solution for Epsom and Ewell

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