

Epsom and Ewell planning improving after Government threat?

15 May 2023



Three Surrey councils have been warned that their planning departments are “not good enough” and threatened with having their decision-making powers stripped.

Guildford, Waverley, and **Epsom and Ewell Borough Councils** have each been written to by the Housing Secretary Michael Gove over their “very poor” quality of service that fell “far below” expected thresholds.

Councils must determine at least 70 per cent of non-major planning applications within eight weeks – or agree to an extension. The three Surrey councils have fallen well below that figure, the department said.

Mr Gove was therefore “minded” to designate the councils, meaning developers could bypass them completely and submit planning applications directly to the Planning Inspectorate. The impact effectively strips a local authority’s say over planning matters.

The letter to all three councils, part of a group of 10 nationally to be given final warning, read:

“The Government is clear that having an efficient and effective planning service at local authority level is essential to delivering the homes, building and investment the country needs.

“The planning performance regime was introduced to ensure that all local planning authorities contribute to this objective. I have significant concerns about the performance of a handful of local authorities including your council.”

For Guildford, its performance of 50.1 per cent between October 2020 and September 2022 was far below the expected threshold of 70 per cent. In **Epsom and Ewell that level was 52.5 percent**, and in Waverley it was 61.7 per cent.

The letter continued: “That is indicative of a very poor quality service to local residents and a significant deterrent to investment in your local housing market and wider economy. That is not good enough, and despite some more encouraging recent data, I am therefore minded to designate [the council]. “

Mr Gove has now asked the Planning Inspectorate to prepare for designations over the summer period but said they had until June to make the required improvement to their planning service and “to exceed our performance thresholds and stay above it consistently”.

If levels were to drop again, he said, he would “not hesitate” to use his “powers to designate your council later this year”.

Waverley Conservatives have since called on the council’s ruling coalition to “get a grip” on planning.

Councillor Carole Cockburn, acting leader of Waverley Conservatives, said: “Communities and local businesses have had the threat of the planning department being taken into special measures hanging over them for months because of the Lib Dem-Labour-Green-Farnham Residents Party coalition administration’s inability to deal with the problem. They need to get a grip, and fast, to save our local voice in planning matters. Otherwise, people and businesses across Waverley will continue to suffer.”

A spokesperson for Waverley Borough Council said that planning performance suffered in 2021 and early 2022, was a result of the pandemic, “teething issues” with a new planning IT system, an increase in applications following lockdown and a nationwide shortage of planning officers.

Since then, they said there had been a “significant uplift in planning performance, and we are making headway in reducing the backlog of planning applications, but caseloads for our officers remain high”. Staffing remains a “significant challenge”.

They added: “Mr Gove has acknowledged the improvement in our performance and rather than moving to formally designate the council, has given us the opportunity to demonstrate this improvement over a longer period of time.”

Waverley Borough Council portfolio holder for planning and economic development, Councillor Liz Townsend, said: “We have been working closely with the Planning Advisory Service to improve our performance, and during the three most recent quarters 83 per cent, 92 per cent and 96 per cent of non-major applications respectively, were determined within the allotted time – significantly above the Government’s 70 per cent target. Our view is that designation is not appropriate and would be counterproductive to sustaining and improving on the gains in planning performance we have achieved over the last year.”

A Guildford Borough Council spokesperson said that it have been working to reduce backlog since June but that caseloads remain high. They said: “To supplement our internal planning team and improve performance, we have employed external planning consultants and temporary planning officers.

“With housing and the cost of living so high in Surrey, recruiting and retaining talent in the South-East remains a significant challenge. However, we are actively recruiting new permanent planners to help build a resilient planning

function. Our new executive head of planning development, Claire Upton-Brown, took up post on March 20, 2023. She has a strong history of turning services around and is well qualified to address the challenges we are facing, with the support of the senior management and councillor team.”

Jackie King, chief executive of **Epsom and Ewell Borough Council** said the authority was hopeful the secretary of state would recognise the “significant” improvements it had made in recent months. She said: “The council has been fully aware of this historic issue relating to performance over that period, which was a result of Covid and capacity-related issues. “Having acknowledged the issues, the council took swift decisive action to address issues, resulting in the recruitment of a new management team in early 2022, the securing of additional staffing resourcing within the department as well as investing in IT and improved ways of working. Additional process reviews and follow on improvements were identified and implemented. All actions and process improvements have the full support of members. As a result of the council’s actions, performance on planning applications has improved rapidly and significantly. Since early 2022, the council has continued to determine well over 90 per cent of planning applications within the statutory timescale target.”

She added: “Epsom and Ewell Borough Council has demonstrated a sustained improvement in service and performance and have been in regular contact with officials at DLUHC over the past year to keep them up to date with the progress which the council has made. When the Minister reviews Epsom and Ewell’s performance again in June, the council will be able show five successive quarters of performance well above the 70 per cent target:

APR/MAY/JUN 2022 – 95 per cent
JUL/AUG/SEP 2022 – 92 per cent
OCT/NOV/DEC 2022 – 94 per cent
JAN/FEB/MAR 2023 – 96 per cent
APR/MAY/JUN 2023 – 97 per cent (to date)

“Once reviewed we are hopeful that the minister will acknowledge and recognise that the issues the council faced were historic and temporary in nature and this council has taken significant proactive steps to address and improve.”

The full list of councils written to by Michal Gove were:

Calderdale, Cotswold, **Epsom and Ewell**, Guildford, Hinckley and Bosworth, Pendle, Portsmouth, Vale of White Horse and Waverley councils, as well as the Peak District National Park Authority.

The cost of planning

15 May 2023



Green Belt campaigners have obtained a breakdown of over half-a-million pounds spent so far by Epsom and Ewell Borough Council on the draft Local Plan and the Town Centre MasterPlan. The Epsom and Ewell Times provides the figures below.

Epsom and Ewell Borough Council’s response to a Freedom of Information Act request:

“The figures below are broken down into two time periods:

- The first covering the April 2016 to December 2021.
- The second period covers January 2022 until 15th April 2023 – this is to reflect that from January 2022 additional evidence was commissioned to support the preparation of the Draft Local Plan 2022-2040.

April 2016 - December 2021 Local Plan consultancy

Service	Consultant	Cost
Spatial Economic Development Strategy	Economic Growth Management Ltd	£13,725
Post Covid - Spatial Economic Development Strategy	Economic Growth Management Ltd	£7,787.50
Sports Facilities Assessment and Playing Pitch Strategy	Ploszajski Lynch Consulting Ltd	£24,113

Green Belt Studies	Atkins Ltd	£36,471.61
Housing Needs Assessment Update	Cobweb Consulting	£14,497.55
Background paper on the horseracing industry	Matthews Associates (UK) Ltd	£2,970
Local Plan Viability Assessment (2019)	HDH Planning & Development Ltd	£16,063
Habitats Regulation Assessment	Lepus Consulting	£7,244.33
Strategic Flood Risk Assessment	Jacobs UK Ltd	£9,838
Graphic Design services	Soapbox Design Limited	£5,940
Local Plan Consultation Support	Luther Pendragon	£16,557.30
Mapping services	Pindar Creative	£2,624
Retail Study	Urban Shape	£26,654
Retail Study - update	Urban Shape	£6,050
Master planning	Allies and Morrison	£71,984
Total		£262,519.29

January 2022 onwards to support Draft Local Plan 2022-2040

Service	Consultant Appointed	Cost
Housing and Economic Development Needs Assessment (HEDNA)	GL Hearne	£47,890.49
Gypsy and Traveller Accommodation Assessment (GTAA)	Opinion Research Services Ltd	£6,850
Local Plan Viability Study (2022)	HDH Planning & Development Ltd	£16,000
Interim Sustainability Appraisal of Draft Local Plan 2022-2040 (Reg 18)	AECOM	£23,807.50
Habitats Regulations Assessment of Draft Local Plan 2022-2040 (Reg 18)	Lepus Consulting	£3,410
Climate Change Study (Part 1)	Wood Plc	£17,512
Graphic Design services	Urban Graphics	£23,000
Emerging Town Centre Masterplan	David Lock Associates	£99,768.10*
Independent Review of Draft Local Plan (Reg 18)	Carewold Associates Ltd	£750
Social Media promotion of Draft Local Plan consultation	Quick Fox Labs	£4,786.45
Printing of consultation materials	EEBC print room and Blue Dot display	£6,291
Total		£250,695.54

* note no net cost to EEBC as funded by the Local Enterprise Partnership The total spend on external services from 1st April 2016 until the 15 April 2023 was **£513,214.83**. However as noted above £99,768.10 of this was for the Emerging Epsom Town Centre Masterplan was funded by the Capital to Coast Local Enterprise Partnership."

Mark Todd, Chair, Epsom and Ewell Labour Party and a candidate in Horton Ward for the upcoming local election, responded to our request to all parties for comment: "Yet more evidence of terrible waste and mismanagement by the Residents' Association running Epsom and Ewell Borough Council. No wonder our council tax is so high and our services so poor. It's time for change at the local elections on May 4. The local Labour party will clean up the council and make sure money is spent wisely again."

Julie Morris, College Ward Councillor and Liberal Democrat told us: "The need for a new Local Plan is known years in advance and steps should have been taken to make sure our borough had robust local planning policies in place, rather than procrastinate over what was exactly the right time to create a new Local Plan."

Much of the evidence base has needed to be updated and has therefore required the work of professional organisations to do this, resulting in a much greater spend than was originally forecast. There was no alternative but for council to agree to this expenditure. Had Residents Association councillors given the matter greater priority, expenditure would undoubtedly have been less. It's important to bear in mind too, that the process is far from complete."

The Residents Association, Conservative Party and Green Party have not responded.

Related Reports:

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Two Epsom brownfield developments?

15 May 2023



With local controversies about the draft **Local Plan** eyeing up **Green Belt**, **Epsom and Ewell Borough Council** soon decides on two Town proposals. LDRS reports:

Plans for a care home on the site of the former Epsom police station and ambulance station are set for refusal by councillors. The planned building, a 96-bed care in Church Street in Epsom, would be over three to five storeys, but council officers have raised concern about its “overly-domineering” impact on the surrounding area.

A meeting of Epsom and Ewell Borough Council’s planning committee on Thursday (April 20) will make a decision on the application.

The 96 bedrooms in the proposed home would provide nursing, residential and dedicated dementia care, and would have en suite wet rooms.

There are 20 listed buildings in the The Church Street Conservation Area, which wraps around the south and west ends of the site. Officers said the scale, form, design and materials of the plans would cause “cause less than substantial harm” to the nearby listed buildings including Hermitage (Grade II Listed), Ashley Cottages (Grade II Listed) and The Cedars (Grade II* Listed).

A council report into the care home said the building would “represent an overly domineering and incongruous addition that would fail to integrate with the prevailing character and appearance of the area”.

Concerns were also raised about the future of trees on the site including a cedar and a lime tree during excavation works for the development.

At the same meeting, councillors should make a decision on a plan for 20 homes in a five- and six-storey development on the corner of West Street and Station Approach in the town.

The plans, which would include just two affordable homes and five parking spaces, received 51 letters of objection raising concerns about the impact on the character of the town, and the loss of the existing building. Officers have recommended the plans be approved, which would include the demolition of the current 1905 building which was originally a corn and coal merchants.

The redevelopment of the former Gillespie’s Bakery building has been objected to by the county council’s highways authority, because of the need to reduce the width of the existing pavement and cycle path.

Under a previous application, the highways authority had not objected to plans, but since then a stronger policy had been adopted to improve travel methods for pedestrians and cyclists, leading to the objection.

Despite the five car parking spaces not meeting the council’s guidelines for parking, an officers’ report said: “The site is in a highly sustainable location with access to a number of public transport modes and the displaced parking can be accommodated in adjacent public car parks and via on street parking.”

The two affordable homes in the plans also fall below the council’s affordable housing recommendations, but a 40 per cent provision would “substantially affect the overall viability of the scheme”, according to council documents.

The meeting will take place on Thursday, April 20 at 7.30pm.

Related reports:

West Street developers climbing down enough?

From custody to caring - new plans for Epsom’s old nick.

Surrey County’s Cathedral citadel conserved...

15 May 2023



The “fundamental specialness” of Guildford and its cathedral have been preserved after plans to build 124 homes next to the historic site were refused.

Guildford Borough Council’s planning committee met on Wednesday, March 29, and heard a “really definitive” 25 minute officer’s report that outlined the scheme.

The cathedral, along with developer Vivid Homes, wanted to demolish the existing staff housing and create 124 homes in a mix of flats and housing – 54 of which would be affordable properties – on undeveloped woodland.

The cathedral said it was selling land surrounding its Grade II listed site to create an endowment fund to pay for maintenance costs but during the presentation, the public heard that cash from this sale would only last five years. When combined with a separate sale, planners said, this would only raise 23 per cent of the budgeted maintenance costs.

Top image: The 124 new homes would be built in the area surrounding the cathedral (Image: Grahame Larter)

Officers at the council recommended refusing the plans of a host of reasons including its harm to the the setting of heritage assets, “visual prominence of the apartment blocks” and the impact on the “green collar” forming part of the “landmark silhouette”.

The plans attracted 286 letters of objection raising issues such as over development, a lack of details on a wider masterplan, and harm to the heritage assets.



Indicative Cgi Of Planning Application For Homes Near Guildford Cathedral. (Image: VIVID Homes)

Councillor **Will Salmon** said: “We’ve been looking at it this for a number of years and there’s definitely been some improvements made in the application over those years particularly on issues like sustainability. The percentage of affordable housing is also admirable here. My overall feeling is it would have to be somewhere else.

Fundamentally this is not the location for this scheme. My concern is the scale, the whole setting, it’s the openness and semi-wild spaces that you can really appreciate as part of the community, that’s the green collar that we see from all sorts of distances. That is the sense that I can certainly feel coming from the many representations.

“The parkland provides very special setting with different short and long views of the cathedral and it provides a sense of proportion which is really essential for a building as big as the cathedral and I think a lot of that would be lost with the high density scheme. Overall my feeling is very much that this is a heritage asset that must be protected. I do worry that the over development here would actually risk the fundamental specialness of the cathedral.”

His concerns were echoed by both Cllrs **Chris Blow** and **Angela Gunning** among others as the chamber united almost unanimously in its opposition to the plans.

The only exception was Cllr **Marsha Moseley** who did not speak on the application but abstained from voting.

A spokesperson for the **Friends of Stag Hill** group which has been campaigning against the application, said: “We would like to thank the **Guildford Borough Council** planning officer for her care and attention to what must at times have been a difficult task, and the committee for looking out for the interests of Guildford.

“Friends of Stag Hill will wait to see the cathedral’s reaction to this second refusal, but would hope that the cathedral now pauses and realises the damaging nature of their proposals, both for the cathedral and the community. The community has now been fighting with the cathedral over the development plans for over seven years, and it is time to accept that developing the land is not an appropriate way to raise funds for the cathedral.

“They have put the local community through significant distress over the last 7.5 years.”

The Grade II-listed cathedral was designed by **Sir Edward Maufe** and work began at the site 1936. This was interrupted by the Second World War and eventually finished through a fund-raising campaign.

The cathedral was consecrated on May 17, 1961.

Related reports:

Will Cathedral repairs threaten Canadian WW1 memorial?

County resists nimbies against children’s home

15 May 2023



Resident objections to a new children’s home and apartments for care leavers have been labelled “petty” as councillors approved the plans.

The former Adult Education Centre in Dene Street, Dorking can now be converted to provide accommodation for young people in the home and in “trainer flats” which bridge the gap before young people move into independent housing.



Plans for new children’s home in Dene Street, Dorking. From Design and Access Statement. Credit: SCC

A meeting of Surrey County Council’s planning and regulatory committee on Wednesday (March 29) unanimously approved the plans, which will include the construction of a new two-storey building on part of the site. But the meeting also heard that of 48 letters received at the time of the meeting, 24 were objecting to the plans.

Three were in support, citing reasons such as the need for suitable accommodation in Surrey and being glad to see a vacant site used, while 21 letters were commenting on the application.

Councillor **Ernest Mallett** MBE (Residents’ Association and Independent, West Molesey) described residents’ objections as “petty” when he spoke on the application. He said: “I don’t quite know what the population are thinking. They seem to be objecting as if this was some sort of prison for about 100 people. I can’t really understand the objections.”

Cllr Mallett added that on a site visit he thought the plans were “an excellent use of the building”.

The development, which will be owned and run by Surrey County Council, raised concern among residents about rats being displaced and the need for pest control in neighbouring properties, and the authority being “poor at managing children’s home”.

These, along with concerns about the consultation carried out and the protection of the “well-being and mental health of existing residents” were put under the heading “other” by officers, stating in the report they were not material planning considerations for the application.

An officers’ report said: “The majority of objections were concerning the need to protect and enhance the site’s nesting swifts.”

Officers confirmed ten “swift bricks”, which allow birds to nest in them, would be added to the design, while the birds’ current access to the roof of the building would be maintained during building work.

Along with the concerns about swifts, residents raised issues including the design being out of keeping with the residential area, worries about anti-social behaviour, noise and disturbance, and smells from “industrialist catering”.

Cllr **Catherine Powell** (Farnham Residents, Farnham North), who sits on the council’s corporate parenting board, said the new facilities were “absolutely necessary” and that she “100 per cent” supported the application.

She told the meeting: “Clearly the building is in a state of decay and it puts it back into a useful purpose.”

Officers confirmed the work would be done in two phases, with the children's home and "no wrong door" facility being built first, followed by changes to the existing building to develop the trainer flats.

The Children's Home would be for a maximum of four residents and 2 staff, while the "no wrong door" facility, also in the new building, would accommodate two emergency residents and one member of staff.

Top image: Dorking Children's home approved in Dene Street, Dorking. Current view from Google Street View

Planning or pantomime? Councillors press pause on Plan.

15 May 2023



Epsom and Ewell council voted to "pause" its controversial Local Plan last night, with one Residents' Association (RA) councillor leaving the meeting after suggesting it was about "forthcoming elections rather than planning policy". The length of the "pause" has not been specified.

Local elections are due to take place on 4 May.

Councillor **Alex Coley** (Residents' Association, Ruxley Ward) told the council: "Considering this motion on its merits, I feel that a more appropriate location might be the Playhouse around Christmas time." "We seem to be debating the forthcoming elections rather than planning policy", he added, suggesting that the pause "ultimately changes very little". Cllr Coley then told the council: "I will leave you now to your debate."

The motion to pause the Local Plan was put forward by councillor **Eber Kington** (Residents' Association, Ewell Court Ward) and six other RA councillors. Cllr Kington said that a pause would acknowledge "the strength of public feeling" on the Plan, enable a reassessment of brownfield sites, and provide the opportunity to look at options that do not use Greenbelt land at all. He added: "We have to take notice of what residents are telling us, through whatever means they choose."

The public consultation on the Draft Local Plan ended on Sunday (19 March) with around 1,500 responses. A petition calling to "Keep Epsom and Ewell Greenbelt" has also reached 10,000 signatures, which is thought to be the greatest response to a petition in the borough's history.

Campaign group Epsom Greenbelt held a protest to "Welcome Councillors" outside of last night's meeting, and were calling for "Green not greed".

Councillor **Bernie Muir** (Conservative, Stamford Ward) said she had "no option" but to vote for the pause, despite believing that "nothing in this motion will actually stop this plan from going ahead in the end".

The pause was discussed in light of expected changes to government planning legislation, including updated guidance on Greenbelt development and how to calculate housing need.

One part of the motion states: "Under the existing legislation Local Planning Authorities are being required to draft Local Plans on the basis of out of date, 2014, data that does not reflect Epsom and Ewell's housing need, as shown in more recently available 2018 data."

Councillor **Peter O'Donovan** (Residents' Association, Ewell Court Ward) said that pausing was not an option because the government had not given at timeframe for its legislative changes. He added that without an up-to-date Local Plan, there was a danger of inappropriate development, and said: "we need to continue on our current strategy, to protect the borough, to produce a plan that protects our Greenbelt."

Councillor **Kate Chinn** (Labour, Court Ward) said that there was a huge need for housing in the borough, particularly social and affordable housing, but that there should be no development on the Greenbelt until every other option had been exhausted. She said that Labour councillors would be voting to pause the Plan.

Councillor **Julie Morris** (Liberal Democrats, College Ward) said: "There's really quite a divide, isn't there, amongst the ruling group?" She said: "We should have been much more clear about the direction that this document was going in, and that's the problem you've got now - you are now having to do a U-turn because it was all kept secret for quite a long time and the public are not happy, understandably."

Cllr Morris said that it was difficult to know whether to vote for the motion, especially when it did not include any

endpoint for the pause, but said that it was the right thing to do on balance.

Councillor **Steven McCormick** (Residents' Association, Woodcote Ward) had five minutes to respond to the points raised because, as chair of the Licensing and Planning Policy Committee, he had led the development of the Local Plan. He said that the proposed pause was reliant on the idea that the government would publish changes to planning policy in May, but that some legislation change may not come until 2024.

Cllr McCormick added that the motion to pause the Plan would create "huge uncertainty" and said: "the best thing for protecting the Greenbelt is to progress". Cllr McCormick voted against the pause.

The council voted to pause the Local Plan by a clear majority, with four councillors (RA Cllrs Dallen, O'Donovan, McCormick and Nash) voting against the pause and Cllr Williamson abstaining.

The text of the motion is [HERE](#).

See editorial.

Ruse within a ruse?

15 May 2023



Yesterday the full Council of Epsom and Ewell voted to pause the process of the Local Plan. Cllr **Eber Kington** (RA Ewell Court) proposed an emergency motion to delay the next stage for the Government's latest position on housing targets to be clarified. Expected some time after the local elections on 4th May.



Cllr Eber Kington

His arguments for the motion included the protection of the Green character of the Borough. He observed that the draft Local Plan conceded the need for using Green Belt to accommodate a proportion of the 5400 houses planned for. Yet, the Government's target is over 10,000. Therefore, Green Belt encroachment for the lower figure is a Green Light for Green Belt development for the higher figure.

He said that more work needed to be done on how brownfield sites could be used to provide the housing requirements.

In an unusual intervention Cllr **Alex Coley** (RA Ruxley) described the proceedings of the Council meeting as a pantomime. He argued that the timetabling of the Local Plan process is one for managerial direction and that Councillors were playing politics. Fitting his description of the proceedings he then made a somewhat dramatic exit stage left in a bit of a huff.

Cllr **Peter O'Donovan** (RA Ewell Court) opposed his ward colleague. He stressed the need for a new Local Plan. Delay would mean the Borough's resistance to inappropriate planning applications would be weakened.

All opposition Councillors (Conservative, Liberal Democrat and Labour) spoke for the motion. After Cllr **Bernie Muir** (Conservative Stamford) called for the ruling Residents Association to be "kicked out", she and her Party were targetted in responses by RA Councillors. Firstly, Cllr **Jan Mason** (RA Ruxley) suggested Cllr Muir had not long lived in the borough "just five years". On a dubious "point of order" Cllr Muir corrected this: "12 years actually".

Cllr Mason struggled on to make her point. A journey into a time nearly 50 years ago when the Council bought Longrove hospital land, thus preventing a 5000 housing development from taking place. Cllr Muir would not have known that, she said. Cllr Mason relied on this 1974 purchase to prove that the RA ruled Council do care about the Green Belt.

This brief spat passed and it was Cllr Kington in his reply to the debate who said that the Conservative Government should be "kicked out". This was because the Government insist on using 2014 figures to determine housing need when much lower numbers are yielded by a 2018 analysis.

Cllr **Steve McCormick** (RA Woodcote and Chair of the Licensing, Planning and Policy Committee) opposed the motion. He relied on the ability of the Council to respond to the public's views and amend the draft during the next 5 of the processes's 7 stages.

There were a significant number of empty chairs in the Council Chamber for this important meeting. Four Councillors

voted against Cllr Kingston's motion. It was carried by a large majority.

The motion passed is HERE in FULL.

This confusion in large part arises from Michael Gove MP and Secretary for Housing Development etc signaling an end to compulsory and centrally set housing targets. First indicated as long ago as May 2022. Then unstated when the Government confirmed its targets remained and then reinstated just a few months later. But no regulations or legislation have been introduced that lift the compulsion of the targets from local government planning obligations.

Cynical observers suggest that Gove's manoeuvres are a ruse to quell the flames of rebellion in the Tory shires and avoid defeats in upcoming local elections. Will we see actual legal change after 4th May?

In Epsom and Ewell was walk-out man Cllr Coley right to hint that the pre-election motion to delay is also for political gain?

A ruse within a ruse?

"That which we call a ruse by any other name would smell as bad."

Time will tell if words are matched by action.

Motion to pause Local Plan process

15 May 2023

The motion passed by an extraordinary meeting of the Epsom and Ewell Borough Council on 22nd March 2023:

Proposer Cllr Eber Kingston

Seconder Cllr Christine Howells

This Council notes that:

1. Extensive green areas, especially the green belt, and the absence of high-level development in our urban areas makes Epsom and Ewell a distinctive, green and an excellent place to live.
2. Under the existing legislation Local Planning Authorities are being required to draft Local Plans on the basis of out of date, 2014, data that does not reflect Epsom and Ewell's housing need, as shown in more recently available 2018 data.
3. The Government's recently proposed legislative changes to the planning process, whilst welcome in several aspects, are not yet enacted and the current legal position has not changed.

These factors suggest that a pause in progressing the Draft Local Plan in its current form would provide an opportunity to assess the Government's draft proposals as well as the 2018 data on housing need in the borough.

This Council therefore agrees that:

i. Other than for the purpose of analysing the responses of the public consultation to capture residents' views and any new information, the Local Plan process be paused to enable:

a) further work on brown field sites, including information arising out of the Regulation 18 consultation

b) further options to be considered that do not include green belt sites

c) an analysis of Epsom and Ewell's required future housing numbers based on 2018 data

d) a clearer understanding of the Government's legislative intentions in regard to protections for the green belt and the current mandatory target for housing numbers.

ii. Write to the MP for Epsom and Ewell calling on in him to use his influence to get the Government to abandon its use of 2014 data to calculate housing need and accept that all planning and housing policies must reflect the latest data if they are to be effective as well command the respect of the people they affect.

Cllr McCormick's own answers on Local Plan

15 May 2023



Cllr Steven McCormick (RA Woodcote Ward) Chair of Epsom and Ewell Borough Council's Licensing, Planning and Policy

Committee writes for the Epsom and Ewell Times to answer many of the questions being asked about the Draft Local Plan. The views are his own and do not necessarily reflect the position of the Council.

Below are FAQs and items from the Epsom Green Belt group page and other sources.

The responses below are my own view and do not reflect that of EEBC or officers.

What is the Greenbelt and why should it be protected?

The Green Belt of land encircling London has protected by law since 1938 to keep urban sprawl in check, preventing towns from merging together and promoting the recycling of derelict land.

These purposes remain as important as they ever were, but now we know that retaining these areas is also critical in slowing and reducing the impacts of climate change, reducing flooding, reducing air pollution and providing essential habitats for wildlife.

Reply

Green belt exists throughout the **country** and is a barrier to prevent urban sprawl in planning terms.

▪ Isn't it prohibited to build on Greenbelt Land?

Other than for very limited uses, Greenbelt Land is protected by law from development. It isn't permitted to build housing on Greenbelt Land except in 'Exceptional Circumstances'.

Reply

It has heavy protections but very special circumstances must be shown before development can be approved. In our draft local plan we do not have enough housing supply with brownfield or urban developments and have had to consider including green belt sites.

An alternative is to build higher and denser in our brownfield/urban sites. This has a downside of likely very tall buildings and a reduction in affordable housing delivery.

Is there any Greenbelt Land that it is OK to build on?

Some land in the Greenbelt has buildings on already, or has sites where buildings used to be. This is called 'Previously Developed Land within the Green Belt'. Without considerable remedial work, this land doesn't support much wildlife and is suitable for development.

▪ Are there exceptional circumstances that require building on the Greenbelt now?

No. The Borough can continue to meet the historical trend of growth in housing need (225 homes / year) through development of Brownfield sites only.

Every year Epsom & Ewell Borough Council, as with all other Councils nationwide, have a housebuilding target. As with many other Councils, the target has not been met each year. Whilst it would be difficult (but not impossible) to meet a 576 house target each year, this is a normal situation both in Epsom & Ewell and across the country. It is not exceptional.

The Draft Local Plan states that this **is** exceptional to justify their plans to build on the Greenbelt.

Reply

The historical trend is not what local plans are driven to achieve by central government. The start point is based on the standard method, which our draft local plan achieves 52% of that need.

Yes there is a consultation on various aspects of the NPPF but at this point in time our target remains based on the 2014 ONS data. As is shown by the recent response from the planning inspector to MVDC it is not current policy, it is consultation and we have to progress on what we have in front of us and that which is currently law.

Furthermore each year a council doesn't meet its housing delivery target they have to justify to central government the reasons for this and the plans to address this. The council runs a risk of being designated which means we lose our local planning control and a central government inspector takes over.

Exceptional circumstances are shown via an evidence based approach to a draft local plan. This is what we have done. The end goal is to get a new local plan adopted and to do that it has to stand up to scrutiny and challenge.

▪ Were Clarendon Park, Livingstone Park, and Manor Park built in the Greenbelt, and if so, what's different about these proposals?

All these estates were built on the sites of the old cluster of hospitals. These were Previously Developed sites within the Greenbelt, therefore developing these sites did not have a detrimental impact on environment and wildlife.

Reply

These were sites in the green belt. They had to prove the previously developed land situation to show very special circumstances existed to develop in the green belt.

Further evidence was provided to support the development in the green belt of these sites.

▪ There's an area of Greenbelt on the Local Plan map that isn't on the Priority Development list of 9 sites, does this mean it is safe from development?

No. All sites bordered in green on the map have been put forward for potential development. If the Council includes any Greenbelt sites on the Priority list, all other Greenbelt sites are at risk of future development.

Any site may be included in a future iteration of the current Local Plan, could be included by the Planning Inspector in the course of their review of the current Local Plan, or could be included in future Local Plans.

Reply

As part of the process a **call for sites** was made which is a requirement of the local plan process. All sites put forward by landowners and developers have to be evaluated for viability and whether they can deliver housing.

Some sites are more deliverable than others.

Some sites are not viable I.e the development costs would be too much.

Some sites proposals may be amended to make them viable or deliverable.

The next stage of consultation, regulation 19, March 2024 will see a more detailed draft local plan put forward for a further six week public consultation.

Additional sites may come forward between now and then.

▪ Does the Draft Local Plan meet the need to supply affordable housing for lower paid workers and the homeless?

No. Although the plan discusses building 40% 'affordable housing' on Greenbelt land and 30% on Brownfield land, this housing may not actually be affordable to those in need.

The definition of 'Affordable Housing' in the National Planning Policy Framework is houses sold at a 20% discount to their market value. In Epsom, the average property sold over the last 12 months was £630k, to an average property sold as 'Affordable Housing' would cost about £510k. This is well out of reach of most people in need of housing in the Borough.

Reply

The Housing and Economic Delivery Needs Assessment (HEDNA) describes the requirement for affordable units across the plan period. The number is circa 670 per year. To start describing cost of housing in the way above is misleading.

There are other options, First Home scheme, social rent scheme, shared ownership schemes to help residents get a home.

Over the last 2 years the borough provided 12 affordable units.

The borough spent approximately £1.5m on overnight homeless accommodation for our residents. This is not sustainable.

This needs to change.

The draft local plan is seeking to deliver 30% affordable from brownfield and 40% from green field developments.

▪ Is it permissible to submit a Local Plan which doesn't meet the full housing need calculated under the government's 'Standard Method', and can it be approved?

Yes. Many other boroughs have done so or are planning to do so such as Mole Valley, Elmbridge, with Worthing Council recently got its Local Plan approved by Inspector with only meeting 25% of its target.

Reply

MVDC have had a response from the planning inspector to make progress.

Submitting a plan with numbers significantly below the target will likely yield the plan being found unsound, thrown out, forced to re-do or the planning inspector does it for us.

Epsom has a number of 5400 of 10,368, 52% of the target.

▪ I've been told that Mole Valley had their request to remove Greenbelt from their Local Plan rejected by the Planning Inspector, is this true, and if so how does it affect the Epsom & Ewell Local Plan?

Mole Valley is in the difficult position of having originally submitted a Local Plan to the planning Inspector which included developing Greenbelt. A number of Councillors were voted out of office as a result and the new Councillors are trying retrospectively to amend the submission. There appear to be significant hurdles to doing this.

Despite that, the Inspector has offered to pause the examination to give time for new Government legislation to be issued (see FAQ 10, below) which may support their case for a change to the submitted plan. It looks like Mole Valley has been offered a lifeline for their challenge.

The implications for Epsom & Ewell are:

a. It is better to exclude Greenbelt from the initial Local Plan submission to the Planning Inspector that to try to change the submission later.

b. The Planning Inspector recognises the likelihood that changes to the National Planning Policy Framework will strengthen the case for excluding Greenbelt from development.

There is no reason to push ahead with a flawed plan that destroys precious Greenbelt.

Reply -

The planning inspector responded to the request stating -

She wishes to make it clear that there has not been a change in Government policy. Rather, the Government is currently consulting on a draft NPPF. Until Government policy is changed (expected in Spring 2023), the Inspector will continue to examine the submitted Plan against current Government policy, contained in the NPPF 2021. She therefore cannot recommend MMs predicated on draft Government policy that may or may not come into effect in its draft form.

The full document can be found here - <https://futuremolevalley.org/wp-content/uploads/2023/02/ED57-Inspectors-Note-23-Reply-to-Councils-Note-31-on-Removing-Green-Belt-Sites-from-the-Local-Plan.pdf>

▪ I heard that the Government is going to abolish the mandatory housing target and no longer require Local Authorities to review Green Belt for housing. Is this true?

Yes, The National Planning Policy Framework specifically states that, with suitable justifications (such as protecting Greenbelt), the full housing target need not be met.

The government intends to implement many of its proposed policy changes by May 2023.

Policy changes include a change to emphasise that the standard method for calculating housing need is “advisory”, removal of the requirement for councils to continually demonstrate a five-year housing land supply, and new lines that stress councils are not required to revise Green Belt boundaries or build at densities out of character even if they are set to miss their house building targets.

Emerging policies do carry substantial weight in planning decisions, therefore at least 20 Councils have already withdrew or paused their Local Plan process, citing the upcoming policy changes. Therefore it is entirely up to EEBC if they would want to be against Central Government policy and continue pushing for large housing development on Green Belt.

Reply

The government has said they are going to consult on possibly changing the housing number calculations. Until they do and change the law and related policies we have to proceed under the current requirements.

MVDC has had a response from their planning inspector saying exactly that.

Until the regulations, policy and law changes we have to use what is currently in place.

▪ The roads into Epsom are already overcrowded, particularly at peak times. What are the plans to address the additional traffic from all the new housing?

According to the 2011 census, there is an average of over 1.5 cars per household in Surrey. That equates to 2,300 new cars from proposed building on the Greenbelt Horton Farm alone.

There are no obvious ways to build new roads or expand existing ones.

No infrastructure plans have been put forward to show how this increased traffic will be managed. Expect long queues!

Reply

Infrastructure is a consideration once the high level draft local plan has been published. The council works with infrastructure delivery partners after regulation 18 to determine what new additional infrastructure may be required and needed to support the proposals.

Infrastructure Delivery Partners rarely come to the table before a draft local plan is published.

▪ It is difficult to get my child into primary school / secondary school as there aren't enough places. If the proposed houses are built, will I still get a school place for my children?

Local primary and secondary schools are either full or near to capacity.

No plans have been put forward for building new schools or expanding existing ones. No land has been allocated for this either. There is no guarantee of a school place and no priority for existing residents.

Reply

Similar to the roads section above.

▪ I see there are plans to build new sites for Gypsies / Travellers. How many will there be and where will these be located?

Regulations require Borough Councils to provide for the Traveller community. The Council has proposed putting 10 traveller sites on the Greenbelt Horton Farm site.

No explanation has been provided for why they are proposed to be located in a single area or on a Greenbelt site.

Reply

Further detail will be provided in the next stage of the draft local plan. Comments from the consultation will be considered, the next stage of how these sites maybe implemented will be further detailed.

▪ Why is the housing target so high?

The short answer is that it doesn't need to be.

Here's some maths to show why...

The actual population growth of the Borough over the last 10 years has been 5,798, an average of 580 people/year (Source: Draft Local Plan para 1.39).

There are 2.58 people in an average household in the Borough (Source: Draft Local Plan para 1.39).

If growth continues at this rate, there would be a need for 225 new homes to be built each year.

The target included in the Draft Local Plan is for 576 new houses per year. This is based on a 'Standard Method' (Source: [Housing and economic needs assessment – GOV.UK \(www.gov.uk\)](#)) which uses a household growth projection from 2014 as a starting point.

The more up-to-date 2018 household growth projection is considerably lower than the 2014 projections, reflecting more recent real growth figures.

This is then increased by 40%, based on the current high cost of housing in the Borough, to give an even higher housebuilding target than the inflated 2014 based figure.

As a result, the quoted housing target is more than 2.5x the need based on the historic population growth in the Borough.

Reply

The housing target is set by central government via the standard method using 2014 ONS data.

Even with with the standard method number our draft local plan is currently showing a 52% delivery of housing supply. 5400 vs target of 10,368.

- **There seem to be lots of sites within Epsom's urban area that are vacant, run down or underutilised, could these be developed for housing instead of the Greenbelt?**

Yes.

Some of these sites have already been earmarked by the Council for development, but many haven't.

The National Planning Policy Framework (which contains mandatory guidance for preparing the Local Plan) para 141 states that before concluding 'exceptional circumstances' exist for developing on Greenbelt, the strategy must:

- a) make as much use as possible of suitable brownfield sites and underutilised land; and
- b) optimise the density of development... including... a significant uplift in minimum density standards in town and city centres and other locations well served by public transport.'

There are lots of sites across Epsom town / urban areas which are not being put forward for use in the Local Plan or appear to be underutilised (for instance the Council's proposals for the town hall site don't meet the minimum density requirements they set in policy S3).

Reply

The Epsom Town Masterplan is due to complete at the end of March and will input into the next stage of the draft local plan. The site area will be reviewed, optimised with options coming forward to members for a steer/view.

- **Does the Borough have to build houses on Greenbelt Land to meet the housing target?**

No. In fact it is only permitted to build on Greenbelt in 'Exceptional Circumstances'.

The National Planning Policy Framework specifically states that housing targets need not be met if it would require building on the Greenbelt (para 11 note 7).

Reply

Similar to an item above. If we are unable to deliver all our housing from brownfield or urban sites we have to consider green belt. Some green belt sites have been put forward during the call for sites which have been evaluated. A small number of these are considered viable at this point and could deliver housing.

- **The Ashley Centre Local Plan display states that development will be 'Located away from areas of flood risk'. How has Horton Farm been selected for development as it regularly gets flooded?**

'Horton' roughly translates from Old English to 'muddy farm'. Both the Environment Agency flood maps and Epsom & Ewell Borough Council's own 2018 Flood Risk Assessment show that Horton Farm is at high risk of flooding from surface water (because there is clay just below the surface) and in practice it is often flooded. A 'Critical Drainage Area' runs through the site.

The Draft Local Plan appears to ignore the flood risk assessment and only considers flooding from rivers.

If the Greenbelt Horton Farm is built on, there is a significant risk that it will result in increased flooding into West Ewell and Ewell Court.

Source: Epsom & Ewell Borough Council Strategic Flood Risk Assessment 2018, Figure 108. Brown areas are in the highest category of flood risk.

Reply

The Ashley Centre Local Plan, read the display boards showing key items of the draft local plan in the Ashley Centre.

Any site being put forward would still need to submit a full and thorough planning application which may include flood risk evaluation and mitigation.

The draft local plan does not get into that level of detail so the statement that it **ignores** the flood risk assessment is misleading at best.

▪ **I'm told the Council has spent £1m on preparing this plan. Would it be expensive to change direction now?**

The money that has been spent is largely on reports that were required to be prepared whatever direction the plan went in.

The earlier changes are made to protect the Greenbelt, the cheaper it is to make those changes.

Reply

All funds spent on the local plan have been shown in LPPC and S&R committees.

Yes there are consultants involved to prepare reports and evidence as we don't have that skillset; this is not unusual and many other boroughs adopt the same approach.

It has to be understood that there is a large body of evidence behind the local plan. Adding or removing sites from the spatial strategy itself has a knock on of recreating that evidence.

The decision point on changes to the spatial strategy and which sites are in or out has no relevance on cost. The work still needs to be done, the evidence still needs to be created.

If the plan is paused then the evidence base may need to be re-worked depending on the length of pause.

▪ **How will developing the Greenbelt land affect wildlife?**

The Greenbelt land is a vital habitat, providing food and shelter for hundreds of species of mammals, birds, amphibians and insects as well as native trees and flowers.

As an example, Horton Farm supports roe deer, bats, greater spotted and green woodpeckers, sparrowhawks, house sparrows, stag beetles, song thrushes, hedgehogs, common toads, and other priority species.

Reply

Any planning application coming forward would have to consider the environmental impact. The updated policies coming forward in our draft local plan are up to date and current on once adopted would help structure applications coming forward.

What follow are questions I was asked at the Bourne Hall and Ashley Centre drop in sessions.

Q: Why aren't residents at and around the proposed sites being communicated with? In the same way as when a planning application is lodged, impacted households get informed.

A: The planning application approach typically has limited effectiveness and a broad communications approach to all borough residents was selected.

Q: Residents only just heard about this because of the Ashley Centre display boards.

A: This was the goal of the boards in the Ashley Centre factored with social media, Borough Insight, Libraries and other outlets.

Q: Is this the only chance we have to input?

A: It is stage 2 of a 7-stage process. This is the first consultation piece.

Q: Infrastructure. Where is it in the plan(s)?

A: At this stage infrastructure delivery partners rarely come to the discussion table at such an early stage. This is part of the motivation to get our draft local plan published to kick start those discussions. There are sections in the draft local plan document on infrastructure but they are high-level at this stage.

Q: Why are we putting the green belt forward?

A: Based on the brownfield and urban sites that have come forward via the call for sites we are very short of our housing number target/start point of 10,000+. We either intensify our brownfield and urban sites by building higher or we consider green belt sites that have come forward.

Q: Why are only 90 homes in the Town Hall allocation?

A: The Epsom Town Masterplan is due to complete in March and will inform the draft local plan into Regulation 19. It is expected this number would increase significantly especially given the steer from council to move to 70 East Street.

Q: Where does it stop? After this local plan do we get asked for more housing by the government?

A: A very good question, at this point based on what we know, come 2040 we may be challenged again to deliver more housing.

Q: Mole Valley has paused and removed all its green belt. Why can't we do the same?

A: In theory we can however Mole Valley are at a very different stage. Pausing at this point would be to wait and see what the outcome of the consultation, mainly on housing numbers. Our draft local plan currently proposes to deliver 52% of the housing number. Any update on housing numbers would only be beneficial to us if that number came down significantly. In the meantime we need to progress.

The planning inspector has just replied and told MVDC that they can't remove green belt via the major modifications

method and that a pause is possible but they should consider not protracting the examination.

Q: As these sites are in the draft local plan is that it?

A: No, the process flows through to Stage 7 and even then a planning application is still required.