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The Christmas present nobody wanted

8 January 2025

Dear Editor,

With the threat of the dissolution of Epsom & Ewell Borough Council hanging in the air (under Angela Rayner's proposals for unitary authorities), residents might expect the RA-led council to demonstrate the value of local government by strongly championing local interests and defending the highly valued Green Belt. Instead, they are putting forward a plan that pleases no-one and will have repercussions for generations to come.

Tomorrow the council is due to issue its Regulation 19 consultation on the proposed Local Plan.

Here's what the Director of Environment, Housing and Regeneration, Vicki Potts, and RA Cllr Woodbridge said about the Regulation 19 consultation process in the Licensing and Planning Policy Committee meeting held on 22 Nov 2023:

Vicki Potts: 'Your Reg 19 document… you can't make any major changes to it following [the Reg 19] consultation. If you want to make major changes at that stage, you can do, but you got to go back and do another consultation on your Regulation 19.'

Cllr Woodbridge: 'From our residents' perspective, when they're being asked to be consulted on the Reg 19, they don't really have much chance then to actually affect it. That is it then, really… I don't want to say we're going through the motions, but that consultation [Reg 19] is a less meaningful consultation than the one we've been through now [Reg 18].'

So the consultation is not an opportunity to amend the plan that so many residents reject, rather it is part of a statutory process that must be completed, however unpopular the plan's content may be.

The Regulation 19 documentation for consultation

Just in time for Christmas, the council is planning to distribute a lump of coal to each residents' Christmas stocking in the form of a consultation on a highly unpopular Local Plan.

In a rebuff to local democracy, following residents' responses to the Reg 18 consultation in early 2023, the council have failed to make changes to the local plan either to provide the truly affordable housing needed to resolve the borough's homelessness issues, or to protect the Green Belt. These are two strategic issues, and both of them featured heavily in responses from the borough residents and statutory consultees to the Regulation 18 consultation.

The council is proposing to redesignate or release over 175 hectares, or c.12% of the borough's Green Belt (see analysis below).

The current National Planning Policy Framework (Dec 2023) gives councils the option not to revise Green Belt boundaries. Since Dec 2023:

- The Epsom Green Belt Group has highlighted this option and strongly encouraged its use.
- The council received legal advice at the start of 2024 which stated that it was legally acceptable to choose not to release Green Belt for development.
- Angela Rayner and Matthew Pennycook have repeatedly stated their expectation that it is previously developed land and 'greybelt' that should be released for development, not high performing Green Belt.

Justin Turvey, 'Head of Place Development' for Epsom & Ewell Borough Council and central to this borough's Local Plan wrote, in response to the Sutton Borough Local Plan consultation in September 2024:

'We note that under the National Planning Policy Framework (December 2023) there is no requirement on local authorities to review or amend their Green Belt boundaries through the plan making process and that any amendments must demonstrate 'exceptional circumstances'.'

[Note: This response, dated 26 September 2024, was obtained through a Freedom of Information request to Sutton Council (see attached) as it was not made publicly available in Epsom & Ewell.]

Despite the clear option to remove undeveloped Green Belt from the Local Plan under the Dec 2023 NPPF, despite opposition to Green Belt development from across the political spectrum, despite government advice to protect high performing Green Belt, despite highlighting this option to a neighbouring borough, and despite overwhelming public opposition to the development of Green Belt, the council has continued to include housing development on the high performing Green Belt sites of both Horton Farm and Hook Road Arena in the Local Plan.

Turning to the newly released NPPF (Dec 2024), it states:

'148. Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.'

The local plan proposals have not prioritised previously developed land (e.g. Hollywood Lodge is not included in the plans). The council has not provided an assessment of greybelt sites in the borough and has not prioritised them for development. The council has instead included the high performing Green Belt sites.

The excuse, or rationale, provided for giving up this high performing Green Belt land for development (despite not having followed the priority order in para 148, above) has been the provision of much needed affordable housing. Whilst there is widespread support for this objective, the reality is very different.

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The council has not made any commitment to the provision of truly affordable homes on either of these sites. According to the Local Plan policies, the majority of the so-called ‘affordable housing’ will be priced at a 20% discount to the market price of the housing in the area.

Likely outcome of examination by planning inspector

Perversely, because of the decisions the Epsom & Ewell borough council has made, particularly the choice to amend Green Belt boundaries, there is a high likelihood that the current plan, if taken forward, will be found unsound and that further Green Belt release will be required.

To stand the best chance of being found sound and to protect the high quality Green Belt, the Local Plan should not amend Green Belt boundaries, should instead focus solely on brownfield and previously developed land, and should be submitted by 12 March 2025 (following Regulation 19 consultation). This can still be achieved, but becomes more challenging every day.

Sticking with an unpopular and unsound local plan may be the Christmas gift the borough residents would prefer not to receive.

Yours faithfully,

Katherine Alexander of Epsom Greenbelt Group

Read the full Epsom & Ewell Borough Council letter here.

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