

SAVE PRIEST HILL PLAYING FIELDS FROM HIGH RISE FLATS

Your local council is recommending that Priest Hill playing fields be redeveloped in their entirety into 350 homes including blocks of flats 6 storeys high.

Time is running out to object. To participate in the consultation and to raise objections visit :

<https://www.epsom-ewell.gov.uk/local-plan> responding in particular to Questions 8, 15, 17, 18 or email directly : localplan@epsom-ewell.gov.uk

**THE DEADLINE TO OBJECT IS 19 MARCH
TREAT THE CONSULTATION AS A REFERENDUM**

Below is a brief summary of the relevant legal framework that the council must operate within together with suggestions for submissions, but it is important to add your own personal sentiment and thoughts

-
1. Government National Planning Policy Framework (NPPF) attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open (s.13, para 137 NPPF). Once established, Green Belt boundaries ***should only be altered where exceptional circumstances are fully evidenced and justified.*** (s.13, para 140 NPPF)
 3. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the council should be able to demonstrate that it has ***examined fully all other reasonable options for meeting its identified need for development.*** In doing so the Council must make ***as much use as possible of suitable brownfield sites and underutilised land.*** (s.13, para 141 NPPF)
 4. Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; ***to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity.*** (s.13, para 145 NPPF)
 5. ***Local planning authority should regard the construction of new buildings as inappropriate in the Green Belt*** (s.13 para 149 NPPF)
 6. The government has announced that it is consulting on a new draft National Planning Policy Framework – with the expected outcome that it will remove current housing targets (and hence remove the need for Green Belt development). In light of this Mole Valley District Council applied to the Planning Inspectorate to amend its submitted draft plan in order to remove the Green Belt sites that it had felt compelled to designate for housing. The Planning Inspectorate has agreed with Mole Valley for it to pause the Inspectorate's review of the proposed plan pending the publishing of revised government policy. ***As such there is no need for Epsom and Ewell Council to press on with proposals for Green Belt development. It can simply apply to wait until revised government policy is published.*** Any pause would

also suspend the enormous outlay in costs that our council continues to incur in this process.

Reasons that Council has not properly applied NPPF in proposing to allocate Priest Hill for housing:

1. The NPPF sets a very high threshold for redesignating Greenbelt. The NPPF requires the council to have “examined fully all other reasonable options for meeting its identified need for development”.
2. Chris Grayling MP has submitted proposals for the development of brownfield sites in the alternative to Green Belt development. The council’s proposed strategy does not make as much use as possible of suitable brownfield sites, contrary to s.14 para 141 (a) NPPF. The council’s Land Availability Report does not adequately address brownfield opportunities and reasons why they are disregarded.
3. In assessing which areas of Green Belt to redesignate for housing it is incumbent on the council to consider whether the targeted areas have ceased to perform the functions of the Green Belt to warrant protection ending. One of the very purposes of initial Green Belt designation is “to provide opportunities for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity”. Priest Hill playing fields have been in continuous sporting use for decades. They form a hub of the sporting and recreational community, for rugby clubs, football clubs, dog walkers, kite flyers, all range of local outdoor leisure activities. It does not comprise idle, derelict land. There are insufficient local alternatives for Ewell East residents for the proposed loss of their sports grounds.
4. The Epsom and Ewell Green Belt Study Stage 1 Report May 2017 (prepared by Atkins) scored the land (referenced in the study as Parcel ID p43) with an overall Green Belt performance scores of 8 out of a maximum score of 12. Priest Hill is positively performing the intended functions of Green Belt, it is designated as higher performing against its purpose.
5. The Epsom and Ewell Green Belt Study Stage 2 report dated May 2018 reported the site: “The open space is a valuable remaining area of open space and recreational amenity, particularly given the surrounding urban context...It also provides an important gap between the settlement edges of Epsom and East Ewell.”

It adds “On Visual sensitivity: the views from dwellings and public rights of way are considered to be of High Sensitivity to change”

On Suitability for release from the Green Belt: it emphatically states “ **No [not suitable]; Landscape and visual sensitivity are medium and high respectively. The parcel forms a critical role in regards to checking the unrestricted sprawl of large built up areas forming part of a gap of less than 1km between the southern urban edges of East Ewell and the eastern edge of Ewell to the west “**

The Council has failed to attach and to disclose this Stage 2 Study as an appendix to the on-line consultation documents. It has dressed the Stage 1 study as a 2023 document, attaching the 2017 study to it as an appendix. It would appear that your Council does not want you to see this document. Google: Epsom and Ewell Green Belt Study Stage Two and visit pages 69-70

Other Reasons that Priest Hill is unsuitable for housing development:

6. Priest Hill as a wider site includes rare chalk grassland. Only around 323.9 hectares of chalk grassland remain in Surrey. Such fragments of plants and animal communities that were once common are now extremely rare and threatened. Its rarity gives this habitat a special value. The combination of plants and animals found here are effectively irreplaceable if damaged. The habitat cannot be recreated if lost. Chalk grasslands are undoubtedly a nationally and internationally rare habitat. The disturbance and pollution from proposed construction, increased traffic, increased recreational use of the grassland by a greater number of residents is incompatible with preserving that habitat.
7. The Surrey Landscape Character Assessment for Epsom & Ewell April 2015 identifies Priest Hill as part of The North Looe Open Chalk Farmland Character Area. The Assessment is clear that the character of the area must be preserved. "The landscape strategy for Open Chalk Farmland is to conserve the open character of the area". The Council's consultation plan for Priest Hill is in direct conflict with the Land Management and Built Development guidelines of this assessment.
8. Insufficient capacity of schools and GP surgeries in the immediate area.
9. Traffic congestion on Cheam Road is such that Holmwood Road and Queensmead Avenue are already used as a cut-through. The junction of Banstead Road and Cheam Road is a particularly awkward junction for vehicles turning right out of Banstead Road onto Cheam Road, and also for vehicles turning right out of Queensmead Avenue. The local area could not easily accommodate additional traffic from the proposed development.
10. Insufficient public transport support for the proposal: No transport infrastructure improvements are planned in the Ewell East area. bus lanes along Cheam Road are not feasible. Epsom and Ewell West stations are the primary transport hubs in the Borough, as opposed to Ewell East where trains are infrequent. Crossrail 2 is intended to serve Epsom station and not Ewell East.
11. Existing drainage in the area is inadequate. Queensmead Avenue is frequently subject to surface water flooding since the drains along Cheam Road are of insufficient capacity.

Reasons that the proposed features of development of Priest Hill are inappropriate.

12. The land has been identified in Stage 1 and Stage 2 Green Belt studies as actively performing Greenbelt with a recommendation that it be preserved yet the council proposes to permit construction of retail shops and 6 storey blocks of flats. Existing planning policies do not even permit 6 storey development on current busy and built up areas such as Cheam Road, but the Council seeks to permit such on Green Belt.
13. The Land Availability Assessment is a report produced by the council itself, and not external specialists. In the event that the Council were to lawfully determine that Priest Hill should be developed, then the LAA states Priest Hill may accommodate 250 deliverable homes. There is no evidence or rationale to support for the Council's proposed designation of 350 homes.

14. There is no justification for new retail space at Priest Hill. There are a large number of vacant shops in Ewell Village and in Epsom. Rival retail centres will further damage the attraction of Ewell Village and Epsom town centre as shopping centres.

IS YOUR COUNCIL ACTING PROPERLY ?

HAVE YOUR SAY