CD6.3

Affordable Housing Proof of Evidence

Annie Gingell (BSc (Hons) MSc MRTPI)

Land at Farm View, Langley Vale Road, Epsom, KT18 6AP

Appeal Ref: 6006971

LPA Ref: 25/00846/OUT

August 2026

Turley

Contents

1.	Introduction	3
2.	Affordable Housing Offer	7
3.	Relevant Planning Policy and Guidance	8
4.	Affordable Housing Needs	15
5.	Past Affordable Housing Delivery	22
6.	Market Conditions	26
7.	Summary	38
Appendix AG1:	Freedom of Information Response	42
Appendix AG2:	Core Documents List	51
Appendix AG3:	Relevant NPPF Extracts	53
Appendix AG4:	Relevant NPPG Extracts	55
Appendix AG5:	Data Tables	59
Appendix AG6:	Relevant Decisions Summary	61

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August 2026

1. Introduction

1.1 My name is Annie Gingell, and I am a Director at **Turley**. I am instructed to present affordable housing evidence at this Inquiry by **Fairfax Aspire Ltd**, herein referred to as 'the Appellant.'

1.2 This Appeal follows the refusal by Epsom and Ewell Borough Council ('the Council') of an outline planning application for up to 110 dwellings at Land at Farm View, Langley Vale Road, Epsom, KT18 6AP ('the Appeal Site').

1.3 My evidence specifically addresses affordable housing provision and the weight to be attributed to this individual benefit in the planning balance, taking into account evidence of local needs and delivery as well as a range of other affordability indicators.

1.4 It concludes that there is a clear and immediate need for the proposed affordable homes, and that **substantial positive weight**[1] should be attributed to the provision of affordable housing at the appeal site in the planning balance.

1.5 As part of my evidence, I have obtained and relied upon data from the Council through a Freedom of Information (FOI) request, available at **Appendix AG1**.

1.6 The evidence which I have prepared and provide for this Appeal (PINS Reference No. 6006971) is true and has been prepared in accordance with the guidance of my professional institution. I confirm that the opinions expressed are true and professional opinions.

Qualifications

1.7 I hold a Bachelor of Science (Hons) degree in City and Regional Planning from Cardiff University (2016) and a Master of Science degree in Spatial Planning and Development also from Cardiff University (2020).

1.8 I am a chartered member of the Royal Town Planning Institute (RTPI) with over 10 years professional experience in the field of town planning and housing.

1.9 I joined Turley in October 2024 as an Associate Director and was promoted to Director in June 2026. Prior to joining Turley, I was an Associate Director at Tetlow King Planning, having joined the company in 2017 as a Graduate Planner. Prior to this I worked as a Planning Policy Officer in Local Government at Bristol City Council. During my undergraduate degree I worked as an Assistant Planner at Pegasus Group primarily on Section 78 appeals.

1.10 During my career, I have presented evidence at numerous Section 78 appeals in the West Midlands, North West, South West, South East, East of England, and London. I have acted

[1] For clarity, the weightings I apply are as follows: none, neutral, limited, moderate, significant and substantial.

on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country.

1.11 I also sit on the British Property Federation (BPF) Affordable Housing Committee, and I am a network leader for Neurodiversity in Planning (NiP) and a national co-Chair of Women in Planning (WiP). I was named one of the RTPI's 'The Planner' magazine's Women of Influence 2025 and Insider magazines South West Property Power List 2025: One to Watch.

Government Commitments to Affordable Housing Delivery

1.12 The importance of affordable housing provision in the planning balance is reinforced by the clear direction set by the current Government. Recent statements by senior members of Government demonstrate that affordable housing delivery is at the centre of current housing policy and planning reform:

- **30 July 2024:** The then Deputy Prime Minister Angela Rayner, in the '**Housing targets increased to get Britain building again**' press release stated that *"our new flexibilities for councils will boost the number of social and affordable homes, and give working families a better route to a secure home"*, signalling an intention to adapt the plan-led system to improve delivery.

- **30 July 2024:** The then Deputy Prime Minister Angela Rayner, in the '**Building the homes we need**' press release stated that "*the Government is committed to the biggest growth in social and affordable housebuilding in a generation. As of 2023, there were 3.8 million Social Rent homes – 200,000 fewer than the four million that existed in 2013. According to revised figures we are publishing today, only 110,000 to 130,000 homes are now due to be delivered under the Affordable Homes Programme, down from an aspiration of 'up to 180,000' when it was launched*". The Government proposed a number of changes in planning policy designed to support the delivery of affordable homes.

- **28 October 2024:** In a Written Ministerial Statement on **'Social and Affordable Housing: Next Steps'** (HCWS169), the then Deputy Prime Minister Angela Rayner stated that the announcements in the Budget *"will enable councils to scale-up delivery of much needed social homes whilst still enabling longstanding tenants to buy their own homes"*, confirming the Government's commitment to expand affordable delivery.

- **20 November 2024:** In her closing speech at the **Social Housing Annual Conference**, the then Deputy Prime Minister Angela Rayner stated that *"no longer will social housing be seen as an after-thought, or worse actively discouraged… we want to build more social homes than we lose",* emphasising the need to embed affordable housing at the heart of planning and delivery.

- **12 December 2024:** In a press release on '**Planning overhaul to reach 1.5 million new homes'**, the then Deputy Prime Minister Angela Rayner stated that *"I will not hesitate to do what it takes to build 1.5 million new homes over five years and deliver the biggest boost in social and affordable housebuilding in a generation. We must* *all do our bit and we must all do more. We expect every local area to adopt a plan to meet their housing need.",* underlining the scale of the Government's ambitions.

- **12 December 2024:** Minister of State for Housing and Planning, Matthew Pennycook, in the '**Building the homes we need**' press release stated that *"rapidly driving up planning consents in the context of a system with woefully inadequate local plan coverage will increase the number of permissions secured outside of local plan allocations in the short-term. This is necessary if we are to see the scale of delivery we need to meet our commitment to 1.5 million homes.* ***Therefore, where it applies, the presumption in favour of sustainable development must have real teeth*"** reflecting the weight of national planning policy and the reality of what will be required to deliver the Government's housing ambitions.

- **11 March 2025:** In a press release on the Planning and Infrastructure Bill titled **'Biggest building boom' in a generation through planning reforms'**, the then Deputy Prime Minister Angela Rayner and Minister of State for Housing and Planning Matthew Pennycook stated that *"Homes and key infrastructure that hundreds of thousands of hard-working people and families need will be built quicker thanks to transformative reforms to get Britain building, tackle blockers and unleash billions in economic growth*".

- **16 December 2025:** In the Written Ministerial Statement '**Planning Reform: Next Phase'** (HCWS1187), Minister of State for Housing and Planning, Matthew Pennycook re-affirmed that *"England remains in the grip of a housing crisis that is both acute and entrenched. The detrimental consequences of this disastrous state of affairs are now all pervasive: a generation locked out of homeownership; 1.3 million people languishing on social housing waiting lists; millions of low-income households forced into unaffordable private rented housing; and more than 170,000 homeless children living in temporary accommodation."*

- **28 January 2026:** The Government published '**Delivering a decade of renewal for social and affordable housing'.** The document confirms that the Government is pursuing *"the biggest increase in supply in a generation"* and identifies pressures in the social and affordable housing sector, including over 1.3 million households on waiting lists and homeownership amongst young people having halved in the last 35 years; average household renting privately spending over 30% of their income on rent; and 15% of households living in poor-quality housing.

- **28 January 2026:** In a Written Ministerial Statement '**Social and Affordable Housing Renewal: Progress Update'** (HCWS1283), the Government confirmed progress on the implementation of its five step plan to deliver a decade of social and affordable housing renewal. The Statement confirms next steps in relation to grant funding, regulation, sector capacity and council housebuilding, and was issued to provide "clarity and certainty" ahead of the opening of bidding for the new Social and Affordable Homes Programme.

- **20 July 2026:** In his first speech as Prime Minister, Andy Burnham committed to a programme of intervention aimed at tackling the housing crisis, stating that the Government *"will build more council homes"* and confirming that his first instruction in office would be *"to end rough sleeping in our country"*. He also pledged to *"put* *the care of people at the heart of everything I do*" and to *"build a new economy"* that would make *"life's essentials"* more affordable, reinforcing the Government's continued commitment to increasing the supply of affordable housing and addressing housing need as a central priority of national policy.

- **24 July 2026:** In a BBC interview titled "Angela Rayner rules out rent controls in England", Housing Secretary Angela Rayner reaffirmed the government's commitment to its target of delivering 1.5 million new homes, while acknowledging the challenge involved. She stated: *"1.5 million homes is a difficult target. It was when I made the target, but I'm going to keep the target, and I'm not going to be defeated."*

1.13 Together, these ministerial statements and speeches confirm that current Government policy places the delivery of affordable housing, secured through the planning system, at the forefront of national housing priorities. This national direction provides important context for the local evidence considered in this Statement.

Scope of Evidence

1.14 My evidence comprises this Proof of Evidence, associated Core Documents ('CDs'), and an accompanying volume of Appendices. The Core Documents referred to in this evidence are listed at **Appendix AG2**.

1.15 This Proof of Evidence comprises the following sections:

- Section 2 - Affordable Housing Offer
- Section 3 - Relevant Planning Policy and Guidance
- Section 4 - Affordable Housing Needs
- Section 5 - Past Affordable Housing Delivery
- Section 6 - Market Conditions
- Section 7 - Summary

1.16 My evidence should be read alongside the main Planning Evidence of Steven Brown (Woolf Bond Planning) (**CD6.2**). It should also be read alongside the overarching Statement of Common Ground (SoCG) (**CD9.1**) and Affordable Housing SoCG (**CD9.5**) both of which have been agreed between the parties.

2. Affordable Housing Offer

2.1 The proposed development is for up to 110 dwellings, of which 50% (up to 55 homes) are to be provided on-site as affordable housing.

2.2 This level of provision exceeds the expectations of Policy CS9 of the Core Strategy which seeks 40% provision from qualifying developments of 15 or more dwellings.

2.3 This level of provision meets the 'Golden Rules' for Green Belt development as set out in the National Planning Policy Framework (NPPF) published in December 2024 which requires affordable housing contributions on such sites to be 15% above the highest existing affordable housing requirement, subject to a cap of 50%.

2.4 The proposed tenure split of the affordable housing units is set out in Table 2.1 below.

Table 2.1: Tenure Split of Affordable Housing Units

Tenure	No. Affordable Units	%
Social Rent	39	71%
Shared Ownership	16	29%
Total	**55**	**100%**

2.5 The tenure split aligns requirements set out in paragraph 3.12.6 (page 32) of the Core Strategy which seeks a tenure mix of 70% social rented, and 30% intermediate affordable housing.

2.6 The affordable housing provision will be secured through a Section 106 Planning Obligation.

3. Relevant Planning Policy and Guidance

Introduction

3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan as a whole unless other material considerations indicate otherwise.

3.2 This section identifies the relevant adopted and emerging Development Plan documents for the provision of affordable housing at the appeal site; as well as any pertinent material considerations. It also identifies the relevant policy context set out in the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG).

The Development Plan

3.3 The relevant adopted Development Plan in respect of affordable housing comprises:

- Core Strategy (2007) (**CD4.1**); and
- Epsom and Ewell Development Management Policies Document (2015) (**CD4.2**).

3.4 Each of these documents are discussed in turn below.

Core Strategy (2007) – CD4.1

3.5 The Core Strategy was adopted in July 2007 and covered the 15-year period between 2007 and 2022. It sets out a long-term planning vision for the Borough and the broad planning strategy to deliver that vision. The Core Strategy has not been reviewed since its adoption almost two decades ago despite being explicitly required to do so by paragraph 34 of the NPPF.

3.6 The Core Strategy recognises the importance of meeting housing need, including affordable housing, throughout the document. In particular:

- Paragraph 2.3.2 (page 8) sets out the key issues for the Borough, of which the first point acknowledges the provision of affordable housing as a "priority need".
- Paragraph 2.6.2 (page 11) sets out the objectives to achieve the vision for the Core Strategy, of which bullet point 3 states "*meeting the diverse social needs of our communities and in particular meeting the needs for affordable housing*".
- Sub-section 3.12 (Affordable Housing and meeting Housing Needs) identifies in paragraph 3.12.2 on page 32 that "*the provision of affordable housing is therefore one of the Council's clear priorities and helping provide the right mix of dwelling sizes and tenures, including affordable housing, is an important function of this pla*n"

3.7 **Policy CS9** (page 33) is the principal policy relating to the provision of affordable housing within the Borough. The policy seeks to provide differing levels of affordable housing depending on the scale of the proposal. Developments comprising between 5 and 14 dwellings are expected to provide at least 20% affordable housing, while developments of 15 or more dwellings are expected to provide at least 40% affordable housing.

3.8 In this context, is it important to highlight that Annex 2 of the NPPF defines major development for housing (i.e., large sites) as 10 dwellings[2] or more. Paragraph 65 of the NPPF makes clear that:

*"Provision of affordable housing **should not** be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer)."* (emphasis added).

3.9 As such, the policy is unlikely to deliver the rate of affordable housing originally envisaged at the time of adoption due to the increased thresholds for triggering affordable housing contributions in the NPPF and therefore a suppression of affordable housing delivery from smaller sites.

3.10 In respect of tenure mix paragraph 3.12.6 (page 32) seeks a tenure mix of 70% social rented, and 30% intermediate affordable housing. This is derived from a 2004 Housing Needs Assessment which is significantly dated and no longer reflective of national policy as set out in detail in Section 4 of this Proof of Evidence.

3.11 The monitoring indicators for Policy CS9 are set out on pages 34 and 35 of the Core Strategy. These include monitoring the number of affordable housing units completed per annum (both in absolute terms and as a proportion of total completions), together with the number of social rented and intermediate affordable homes delivered each year.

3.12 The affordable housing target in Policy CS9 is identified as the benchmark against which delivery will be assessed and confirms that the intended affordable housing tenure mix is 70% social rented and 30% intermediate affordable housing. However, as noted above and in Section 4, this tenure mix is based on a 2004 Housing Needs Assessment and is now significantly out of date.

Development Management Policies Document (2015) – CD4.2

3.13 The Development Management Policies Document was adopted in September 2015 and provides detailed development management policies to support the delivery of the Core Strategy's strategic objectives and overall vision.

3.14 Paragraph 4.11 (page 36) identifies "*our evidence shows that family sized homes remain in demand and that there be an insufficient supply to meet either market or affordable housing needs*".

[2] or the site has an area of 0.5 hectares or more

3.15 The Development Management Policies Document does not set out any affordable housing policies, instead referring to the approach taken by the Core Strategy.

Other Material Considerations

National Planning Policy Framework (December 2024) – CD5.1

3.16 The latest NPPF was published on 12 December 2024 and outlines the government's planning policies for delivering affordable housing in England within the broader context of sustainable development (paragraph 8) and in support of the Government's objective of significantly boosting the supply of homes (paragraph 61).

3.17 **Appendix AG3** sets out the paragraphs of the NPPF of particular relevance to affordable housing.

National Planning Practice Guidance (2014, Ongoing Updates)

3.18 The NPPG is an online resource that provides detailed guidance to support the implementation and application of the NPPF. It was first published in March 2014 and is regularly updated to reflect changes in planning legislation, policies, and best practices.

3.19 **Appendix AG4** sets out the paragraphs of the NPPG of particular relevance to affordable housing.

3.20 The Mead Realisations Limited v Secretary of State for Levelling Up, Housing and Communities [2025] Court of Appeal Judgment confirms that the NPPG has the same policy status as the NPPF.

Revised Developer Contributions Supplementary Planning Document (2014) – CD4.4

3.21 The Revised Developer Contributions Supplementary Planning Document (SPD) was adopted in September 2014. This document provides further detail on how Policy CS9 will be applied.

3.22 Paragraph 1.1 of Part 2 of the SPD (page 14) states that "the affordability of housing is one of the biggest challenges facing the Borough". Paragraphs 1.2 to 1.5 (pages 14-15) go on to explain that high house prices and rents create significant barriers to accessing housing, particularly for first-time buyers, key workers and lower-income households, and identify the delivery of affordable housing as a key mechanism for widening housing choice and supporting mixed and sustainable communities.

3.23 The SPD also reflects the evidence available at the time. Paragraph 2.3 (page 15) refers to a 2008/2009 East Surrey Strategic Housing Market Assessment and records an annual affordable housing shortfall of 470 dwellings per annum within the Borough, whilst paragraph 2.5 acknowledges that this level of need could not realistically be met through planned housing delivery but nevertheless demonstrates the importance of maximising affordable housing provision through new development.

3.24 Importantly, the SPD reflects changes in national policy that occurred after the adoption of the Core Strategy. Paragraph 3.4 (pages 17-18) incorporates the introduction of

Affordable Rent within the definition of affordable housing, which was not recognised in the 2007 Core Strategy.

3.25 However, the SPD continues to apply the affordable housing definition contained in the 2012 NPPF and states that "low cost market housing" does not constitute affordable housing for planning purposes. This predates the broadened definition of affordable housing introduced in the 2018 NPPF (and retained in the December 2024 NPPF), which expanded the range of affordable home ownership products capable of contributing towards affordable housing delivery.

3.26 Whilst the SPD therefore provides useful guidance on the implementation of Policy CS9, it remains underpinned by evidence and national policy that have subsequently been superseded. Consequently, limited weight should be attached to those aspects of the SPD that relate to affordable housing definitions, tenure requirements and housing needs evidence.

Emerging Local Plan 2022 – 2040 – CD4.20

3.27 The Council is currently preparing a new Local Plan to cover the period to 2040. The Plan was formally submitted to the Secretary of State on 10 March 2025, and an independent examiner has been appointed.

3.28 During the Stage 2 examination hearing sessions, it was identified that the submitted Local Plan would not adequately meet the Borough's identified housing needs. The Council was therefore requested to undertake additional work to identify further potential site allocations. A consultation on the proposed additional allocations was subsequently undertaken between May and June 2026.

3.29 The Regulation 19 draft plan as submitted makes references to affordable housing including:

- Under the sub heading 'Deprivation' on page 12, the Plan states that "*Epsom is one of the least affordable places to live in Surrey when comparing median household incomes to median property price*s"

- Under Policy S6 'Affordable Housing' on page 71, the Plan states that "*housing affordability is a significant issue for Epsom and Ewell and is a key priority for the counci*l".

- Pages 70-71 explain that the 2023 Housing Economic Development Needs Assessment (2023 HEDNA) identifies a need to prioritise additional social rented and affordable rented housing, and that this evidence has informed the affordable housing policy (detailed below).

3.30 **Draft Policy S5 (Housing Mix and Tenure)** on page 70 outlines the intended housing mix for the Borough. It states that residential development will be permitted where "*the mix of tenure, type and size reflects housing need, set out in the Housing and Economic Development Needs Assessment (2023) or any subsequent update"*. Table S5a establishes the recommended mix of affordable homeownership and rented affordable homes, drawing on the findings of the 2023 HEDNA.

3.31 **Draft Policy S6 (Affordable Housing)** on pages 71-73 requires a minimum of 40% onsite affordable housing on greenfield sites providing 10 or more dwellings or where the site has an area of 0.5hectares. The draft policy sets out the following requirements:

- A preferred affordable housing tenure split comprising 30% affordable home ownership and 70% affordable rented housing, with 50% of the affordable rented homes secured as social rent.

- Affordable housing to be integrated and dispersed throughout the development, unless site-specific circumstances justify an alternative approach.

3.32 **Draft Policy DM1 (Residential Space Standards)** requires a minimum of 20% of all new affordable dwellings to meet the Building Regulations standard for accessible and adaptable dwellings.

3.33 Given that there remain unresolved objections, the examination is ongoing, and the Plan is subject to potential modification, including the identification of additional site allocations, the draft policies in the emerging Local Plan can only attract limited weight in the determination of the appeal proposals.

Five Year Housing Land Supply Position

3.34 The Council confirmed in its latest Authority Monitoring Report covering the 2024/25 monitoring year (**CD4.17**) that it is only able to demonstrate a 1.49 year housing land supply.

3.35 As such the presumption in favour of sustainable development, as set out in full under paragraph 11 of the NPPF, is engaged. Paragraph 11d(ii) is explicit that particular regard should be had to providing affordable homes. The absence of a five year housing land supply underscores the importance of prioritising developments that can deliver much-needed housing, particularly affordable housing.

3.36 The provision of affordable housing is a key objective of the NPPF, recognising its critical role in addressing local housing needs and ensuring that communities have access to a range of housing options. In this context, the Proposed Development must be considered in context of its ability to contribute meaningfully to the delivery of affordable housing within the Borough.

Consultation Draft National Planning Policy Framework (CD5.2) and Written Ministerial Statement (CD16.6) (16 December 2025)

3.37 On 16 December 2025, the Government published a consultation draft of the NPPF alongside an accompanying WMS by the Housing Minister, Matthew Pennycook MP. Taken together, these documents are a material consideration and provide a clear and authoritative statement of the Government's policy position and intended direction of travel for the planning system.

3.38 The WMS sets out an unequivocal assessment of the current housing situation in England. The Housing Minister states that:

*"<u>England remains in the grip of</u> **<u>a housing crisis that is both acute and entrenched</u>**. The detrimental consequences of this disastrous state of affairs are now all pervasive: a generation locked out of homeownership; 1.3 million people languishing on social housing waiting lists; millions of low-income households forced into unaffordable private rented housing; and more than 170,000 homeless children living in temporary accommodation."* (emphasis added).

3.39 This framing makes clear that the Government views the housing crisis, and particularly the shortage of affordable housing, as a systemic failure requiring urgent and sustained intervention. The WMS confirms that the planning system is central to addressing this crisis.

3.40 In particular, the WMS places strong emphasis on securing a more appropriate and diverse mix of homes through the planning system. The Housing Minister states *"Securing a diverse mix of homes. We want to better support the needs of different groups through the planning system."* The WMS goes on to confirm that this includes *"stronger support for rural social and affordable housing and setting clearer expectations for accessible housing to meet the needs of older and disabled people."*

3.41 This reflects a clear policy intention to strengthen, rather than dilute, national support for affordable and specialist housing provision. The consultation draft NPPF gives effect to this direction of travel through proposed policy changes which strengthen expectations around meeting identified needs and supporting delivery of the right mix of homes including rural social and affordable housing and accessible housing.

3.42 Taken together, the Draft NPPF consultation and the accompanying WMS underline the Government's clear recognition that England's housing crisis is severe, long standing and unresolved, and that the planning system has a central role to play in responding to it. The emphasis placed on the scale and consequences of unmet housing need, alongside the stated intention to strengthen support for affordable housing and to secure a more appropriate mix of homes, provides clear policy context for decision making.

Corporate Documents

3.43 The Council's corporate documents identify the delivery of affordable housing as a high corporate priority. This includes the Homelessness & Rough Sleeping Strategy (**CD10.1**) which identifies the provision of affordable housing as "Key Objective 3" (see p 15-17).:

Conclusions

3.44 The adopted policy framework for affordable housing is principally contained within Policy CS9 of the Core Strategy (2007), supported by the Revised Developer Contributions SPD (2014). Together, these documents establish the Borough's affordable housing requirements and provide guidance on the delivery and implementation of affordable housing.

3.45 The Core Strategy was adopted in 2007 and covered the period to 2022. It has not been reviewed since adoption, notwithstanding the expectation in paragraph 34 of the NPPF that strategic policies should be reviewed at least once every five years. The affordable housing tenure mix is derived from a 2004 Housing Needs Assessment, whilst the SPD reflects affordable housing definitions and national policy that have subsequently been amended.

3.46 The emerging Local Plan proposes to retain a 40% affordable housing requirement on qualifying greenfield sites and continues to identify affordable housing as a significant planning issue for the Borough. However, the Plan remains under examination and can attract only limited weight at this stage.

3.47 The current national policy framework is provided by the NPPF and NPPG, both of which place considerable emphasis on meeting identified affordable housing needs and delivering a suitable mix of homes. Recent Ministerial Statements and proposed changes to national policy further demonstrate the Government's continued focus on increasing the supply of social and affordable housing.

3.48 The Council accepts that it is currently unable to demonstrate a five-year housing land supply. Consequently, the presumption in favour of sustainable development set out at paragraph 11(d) of the NPPF is engaged. Paragraph 11(d)(ii) is explicit that, in applying the presumption, particular regard should be had to the provision of homes, including affordable homes.

3.49 Against this policy background, it is necessary to consider the extent of affordable housing need within the Borough and the contribution that the appeal proposals would make towards addressing that need. These matters are considered in the following sections of this Proof of Evidence.

4. Affordable Housing Needs

Introduction

4.1 This section explores the affordable housing needs identified in the adopted Development Plan and its associated evidence base, as well as more recent assessments of affordable housing need in order to provide a comprehensive understanding of formally identified affordable housing needs across the Borough.

4.2 In addition to formal Local Housing Need Assessments, this section examines other indicators of affordable housing need such as the number of households on the Housing Register, households housed in temporary accommodation and homelessness rates. These real-world metrics offer additional insights and perspective on the pressing need for affordable housing in Epsom and Ewell Borough Council.

Adopted Development Plan

4.3 Policy CS9 of the Core Strategy (2007) (**CD4.1**) states that *"35% of new dwellings should be affordable. This equates to the provision of 950 new affordable homes over the period 2007 to 2022*" which is equivalent to 63 dwellings per annum. This is a policy target that forms part of the Development Plan, but in itself does not reflect the full extent of affordable housing need in the Borough.

4.4 The Core Strategy (2007) is underpinned by a Housing Need Assessment published in 2004 which identified an annual net affordable housing shortfall of 518 homes over an unspecified period (set out at paragraph 3.12.5 on page 32 of the Core Strategy).

4.5 This assessment is now significantly outdated. It predates the NPPF and NPPG, the introduction of Affordable Rent in 2011, and the broadened Annex 2 definition of affordable housing introduced in the 2018 NPPF (and retained in the December 2024 NPPF) which expanded the scope of affordable home ownership products.

4.6 Accordingly, the Core Strategy evidence base and associated Policy CS9 target no longer reflect national policy or current affordable housing needs and carry limited weight in the determination of the appeal proposals.

Emerging Development Plan

4.7 The Housing and Economic Development Needs Assessment published in January 2023 (2023 HEDNA) (**CD4.19**) was prepared as part of the evidence base for the emerging Local Plan. It calculates housing need over the 18 year period from 2022/23 to 2040/41.

4.8 The document provides a detailed breakdown of need by tenure:

- Table 44 (page 196) identifies a net need for 574 affordable/social rented homes per annum between 2022/23 to 2040/41, equating to 10,332 homes from 2022/23 to 2040/41.

- Table 45 (page 200) identifies a net need for 78 affordable homeownership homes per annum between 2022/23 to 2040/41, equating to 1,404 homes from 2022/23 to 2040/41.

- As such, the 2023 HEDNA identifies a total net need for 652 affordable dwellings per annum over the period, equating to 11,736 homes from 2022/23 to 2040/41.

4.9 Overall, the 2023 HEDNA identifies a need for 652 affordable homes per annum, representing a significant and ongoing affordable housing need. This is materially higher than the 518 affordable homes per annum identified in the 2004 Housing Need Assessment that underpinned the adopted Core Strategy, indicating that affordable housing pressures in the Borough have increased rather than diminished over time.

Indicators of Affordable Housing Need

4.10 Key indicators like the number of households on the Council's Housing Register, homelessness rates and households housed in temporary accommodation all serve as crucial markers of current affordable housing need in the Borough.

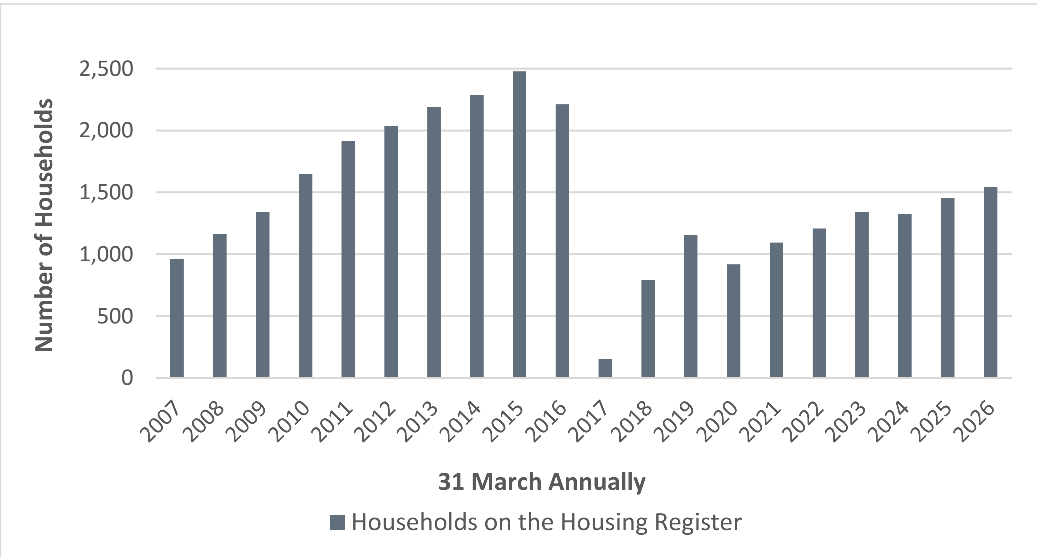
4.11 The data in this section has been obtained from Ministry of Housing, Communities and Local Government (MHCLG) published statistics and incorporates data provided in the Council's FOI response (**Appendix AG1**).

Housing Register

4.12 On 31 March 2026 there were **1,541 households** on the Council Housing Register. This is a 6% increase from the previous year where the figure stood at 1,456 households.

4.13 Figure 4.1 below illustrates the trend in the number of households on the Housing Register since the start of the Core Strategy period in 2007/08.

Figure 4.1: Number of Households on the Housing Register, 31 March 2007 to 31 March 2026



Source: MHCLG Open Data and Freedom of Information response.

4.14 The Localism Act 2011, which came into force in 2012, gave local authorities the power to set their own qualification criteria determining who may or may not go onto the housing waiting list. Previously, local authorities were only able to exclude from their waiting list people deemed guilty of serious unacceptable behaviour. The MHCLG data set acknowledges that *"The Localism Act 2011, has contributed to a decrease in the size of waiting lists, as it allowed local authorities to set their own qualification criteria*".

4.15 Following the 2012 changes brought about by the Localism Act, Epsom and Ewell Borough Council published a revised Housing Allocation Policy in 2016 which received further revisions in 2023. Despite these changes there has been a clear increase in more recent years, rising from 919 households in 2020 to 1,541 households in 2026. This demonstrates that, even within a more restricted system, the level of unmet affordable housing need in the Borough has grown in recent years and remains persistently high.

4.16 It is however important not to lose sight of the fact that each of the 1,541 households on the Council's Housing Register are real people in need of an affordable home *now*. In an appeal decision at Oxford Brookes University Campus at Wheatley, (**CD15.3, p74, [13.101]**) the Inspector asserted at paragraph 13.101[3] of his report that in the context of a lengthy housing register of 2,421 households:

"It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses" (emphasis added).

Waiting Times

4.17 The Council's Freedom of Information response (**Appendix AG1**) shows that successful applicants for affordable housing face lengthy waits for an affordable home in Epsom and Ewell.

4.18 Table 4.1 illustrates that, based on the dwelling size, successful applicants in the 2025/26 monitoring period experienced an average waiting time ranging from just over 2 years to more than 6 and a half years for an affordable home.

Table 4.1: Housing Register Average Waiting Times, 1 April 2025 and 31 March 2026

Type of affordable property	No. of Lets	Average Wait
1-bed affordable property	53	2.11 years (770 days)
2-bed affordable property	31	4.37 years (1,596 days)
3-bed affordable property	13	6.51 years (2,377 days)
4+ bed affordable property	0	n/a

Source: Freedom of Information response.

4.19 It is important to recognise that these figures represent averages, meaning that some households may have experienced waiting times even longer than those indicated.

[3] Endorsed by the Secretary of State at paragraph 35 of the decision.

Furthermore, these statistics reflect only the waiting periods of successful applicants, who are often in the highest priority need.

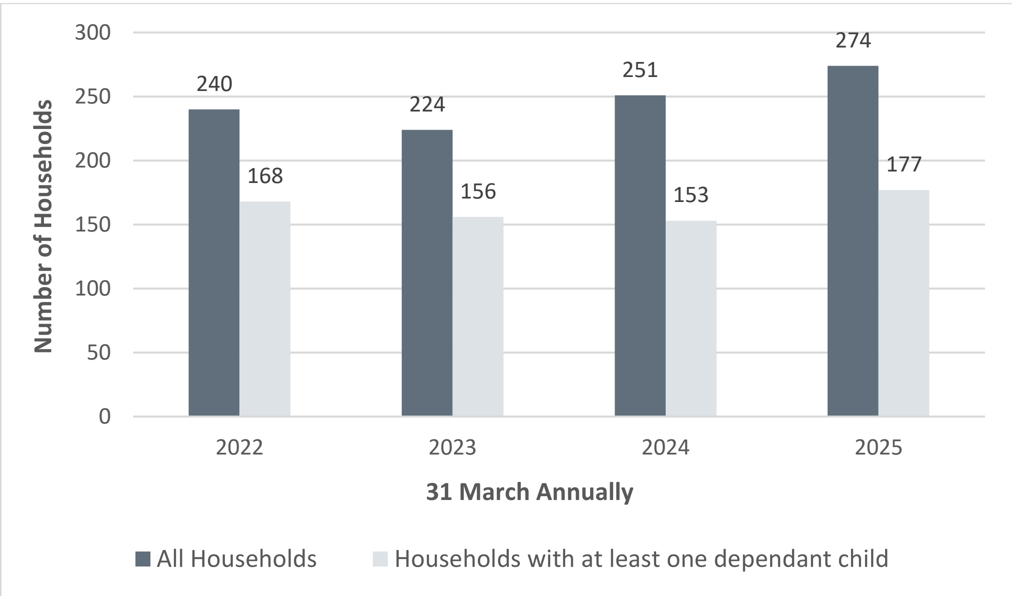
4.20 The FOI response makes clear that for applicants newly joining the Housing Register and assessed as having a high housing need, estimated waiting times are now substantially longer. It further states that households with lower priority needs have "*little or no prospects of being offered social housing*". Collectively, these findings highlight the significant disparities in access to affordable housing and demonstrate the increasing challenges faced by households across different levels of housing need.

Temporary Accommodation

4.21 Temporary accommodation is intended to provide an immediate, short-term housing solution for individuals and families facing homelessness or urgent housing needs.

4.22 Figure 4.2 below shows the total number of households and households with children within temporary accommodation in the Borough between 2022 (first published) and 2025. It highlights that **on 31 March 2025 there were 274 households in temporary accommodation**, 65% of which had at least one dependent child.

Figure 4.2: Households in temporary accommodation, 31 March 2022 to 31 March 2025



Source: MHCLG Open Data.

4.23 The data demonstrates a 14% increase in the number of households in temporary accommodation over the four-year period. <u>On 31 March 2025 there were 347 children housed in temporary accommodation by the Council</u>. Table 4.2 below shows the length of time households had been in temporary accommodation.

Table 4.2: Number households in temporary accommodation by length of time, 31 March 2025

Length of time	Less than a year	1 to 2 years	2 to 5 years	5+ years	Total
Number of Households	91	50	75	58	274
% of Total	**33%**	**18%**	**27%**	**21%**	**100%**

Source: MHCLG Open Data.

4.24 Table 4.2 highlights that 66% of households had spent more than a year in temporary accommodation. This means that those in need of affordable housing are spending extended periods of time in accommodation which is unlikely to be suited to their needs. MHCLG data indicates that the Council spent **£3,266,000 on temporary accommodation** in the 2024/25 financial year, 69% of which was spent on Bed and breakfast hotels (including shared annexes). This figure represents a 38% increase from the previous year (2023/24) where the figure stood at £2,360,000.

4.25 The above evidence underscores the pressing need for an increase in rented affordable housing stock to reduce dependency on costly private sector accommodations and provide more stable and suitable housing solutions for households in temporary accommodation. Such an increase would not only alleviate financial pressures on public resources but also offer vulnerable households a greater sense of security and community stability, contributing to improved long-term social and economic outcomes.

Homelessness

4.26 Homelessness is a critical social challenge, reflecting broader issues of housing affordability, availability, and support for vulnerable populations. Local authorities have a statutory duty under the Homelessness Reduction Act 2017 to prevent and relieve homelessness:

- The **Prevention Duty** places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homeless. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

- The **Relief Duty** requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

4.27 As demonstrated by Table 4.3 below, in the 12 months between 1 April 2024 and 31 March 2025, the Council accepted 97 households in need of a homelessness prevention duty, and a further 113 households in need of a relief duty from the Council.

Table 4.3: Number of households owed a homelessness duty by reason for loss of last settled home, 1 April 2024 to 31 March 2025

Reason for loss of last settled home	Prevention duty		Relief duty	
	No. Households	%	No. Households	%
Family or friends no longer willing or able to accommodate	18	19%	36	32%
End of private rented tenancy - assured shorthold	61	63%	23	20%
Domestic abuse	0	0%	18	16%
Non-violent relationship breakdown with partner	1	1%	6	5%
End of social rented tenancy	3	3%	5	4%
Eviction from supported housing	1	1%	1	1%
End of private rented tenancy - not assured shorthold	4	4%	0	0%
Other violence or harassment	0	0%	8	7%
Left institution with no accommodation available	4	4%	5	4%
Required to leave accommodation provided by Home Office as asylum support	0	0%	1	1%
Home no longer suitable - disability / ill health	1	1%	0	0%
Other reasons / not known	4	4%	10	9%
Totals	**97**	**100%**	**113**	**100%**

Source: MHCLG Open Data.

4.28 The data highlights distinct patterns in the reasons for the loss of settled homes among households receiving Prevention Duty and Relief Duty support. For those under Prevention Duty, the most common cause was the end of private tenancies, accounting for a combined 67% when assured and non-assured shorthold tenancies are considered together. This suggests that insecurity in the private rented sector remains a significant driver of potential homelessness across Epsom and Ewell and reflects wider trends in affordability and tenancy instability.

4.29 Under Relief Duty, the data shifts to emphasize crisis driven causes. The breakdown of arrangements with family or friends becomes the leading factor (32%), highlighting the reliance on informal housing arrangements as a last resort. Domestic abuse (16%) also emerges as a significant driver. The loss of private rented accommodation also remains a significant factor, accounting for 23 households (20%) under assured shorthold tenancies and a further household under a non-assured shorthold tenancy, equivalent to 21% of all Relief Duty cases. This demonstrates that pressures within the private rented sector continue to contribute materially to homelessness despite earlier intervention opportunities.

4.30 These findings collectively highlight the need for tailored strategies that address both the predictable risks within the private rental sector and the immediate crises stemming from personal or social breakdowns. They also reinforce the critical importance of significantly increasing the supply of affordable housing, in order to provide secure, long-term options for those at risk of homelessness and to reduce reliance on temporary or informal living arrangements.

Conclusions

4.31 The evidence presented in this section demonstrates a substantial and persistent need for affordable housing within Epsom and Ewell. The adopted Core Strategy was underpinned by a 2004 Housing Needs Assessment which identified a net affordable housing shortfall of 518 dwellings per annum, whilst the Council's most recent assessment, the 2023 HEDNA, identifies a significantly higher need of 652 affordable dwellings per annum, comprising 574 affordable rented homes and 78 affordable home ownership homes each year.

4.32 The scale of identified need is reflected in a range of current indicators. As at 31 March 2026, there were 1,541 households on the Council's Housing Register and as at 31 March 2025 there were 274 households living in temporary accommodation, including 347 children. In 2024/25, 97 households were owed a prevention duty and 113 households a relief duty during 2024/25. These indicators demonstrate that affordable housing need is not confined to future projections but is being experienced by households across the Borough today.

4.33 The evidence also indicates that many households in housing need are experiencing prolonged periods without access to suitable accommodation. Two-thirds of households in temporary accommodation had been there for more than a year, whilst homelessness data highlights the significant role that affordability pressures and insecurity within the private rented sector continue to play in driving housing need.

4.34 Taken together, the adopted evidence base, the Council's latest housing needs evidence and the wider indicators of housing stress all point in the same direction. Affordable housing need within Epsom and Ewell is substantial, longstanding and ongoing, with current levels of need exceeding those identified when the adopted Core Strategy was prepared. The extent to which this need has been met through recent affordable housing delivery is considered in the following section.

5. Past Affordable Housing Delivery

Introduction

5.1 This section reviews past rates of affordable housing delivery across Epsom and Ewell, revealing significant and persistent shortfalls against identified needs. These findings underscore an urgent and pressing need for a substantial increase in affordable housing provision throughout the Borough.

5.2 The analysis in this section is underpinned by the data tables provided at **Appendix AG5**, which have been compiled from Ministry of Housing, Communities & Local Government (MHCLG) published statistics and Census data produced by the Office for National Statistics (ONS). It also incorporates data provided in the Council's FOI response (**Appendix AG1**).

Additions to Affordable Housing Stock

5.3 Since the start of the Core Strategy period in 2007/08 to 2024/25 the Council has added a total of 1,108 gross affordable dwellings to its housing stock, equivalent to an average of 62 affordable dwellings per annum. When compared with the total net housing completions figure of 3,750 dwellings, gross affordable housing delivery has represented approximately 30% of additions.

5.4 Whilst the gross data from MHCLG accounts for new build affordable dwellings and acquisitions from the private sector, it does not account for any reductions in affordable housing stock due to demolitions or Right to Buy sales from Council and/or RP affordable housing portfolios. Table 5.1 below illustrates the effect of Right to Buy sales on gross additions in Epsom and Ewell.

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Table 5.1: Net Additions to Affordable Housing Stock, 2007/08 to 2024/25

Monitoring Period	Gross Additions	Right to Buy Sales	Net Additions
2007/08	84	Data not available	84
2008/09	52		52
2009/10	66		66
2010/11	31		31
2011/12	122	0	122
2012/13	184	2	182
2013/14	172	1	171
2014/15	56	1	55
2015/16	48	2	46
2016/17	66	3	63
2017/18	0	2	-2
2018/19	77	0	77
2019/20	32	2	30
2020/21	18	0	18
2021/22	11	0	11
2022/23	67	0	67
2023/24	22	0	22
2024/25	0	1	-1
Totals	**1,108**	**14**	**1,094**
Avg. Pa.	***62***	***1***	***61***

Source: MHCLG Open Data

5.5 The data highlights that over the 18-year period there has been a total of 14 losses to affordable housing stock through the Right to Buy, this represents approximately 1% of gross additions. When the effect of the Right to Buy is taken into account the Council has delivered just 1,094 net affordable homes since 2007/08, equivalent to 61 dwellings per annum. This represents only 29% of total net housing additions. This figure is likely to fall even further if demolitions were taken into account[4].

Net Additions vs Net Needs

5.6 Table 5.2 compares net additions to affordable housing stock in Epsom and Ewell Borough with the needs identified in the 2023 HEDNA. This provides an indication of the extent to which recent affordable housing delivery has met identified needs and whether sufficient progress is being made towards addressing the substantial affordable housing requirement identified by the Council's evidence base.

[4] MHCLG does not provide affordable housing demolition data at local authority level.

Table 5.2: Net Additions Compared to Needs Identified in the 2023 HEDNA, 2022/23 to 2024/25

Monitoring Period	Net Additions	Net Need	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2022/23	67	652	-585	-585	10%
2023/24	22	652	-630	-1,215	3%
2024/25	-1	652	-653	-1,868	0%
Total	**88**	**1,956**	**-1,868**		**4%**
Avg. Pa	***29***	***652***	***-623***		

Source: MHCLG Open Data; and 2023 HEDNA.

5.7 Table 5.2 demonstrates that in the three-year period since the start of the 2023 HEDNA period in 2022/23, just 88 net affordable dwellings have been delivered across the Borough, meeting only 4% of the identified need for 1,956 affordable homes over the period. This equates to an average of just 29 net additions per annum compared to an annual identified need for 652, resulting in an average annual shortfall of 623 homes. Put simply, around 96% of identified affordable housing need has gone unmet over this period.

Addressing the Shortfall

5.8 The scale of the shortfall, combined with the substantial number of households on the Council's Housing Register, underscores an urgent and pressing need for affordable housing. The **1,541 households** on the Council's Housing Register are in need of an affordable home *now*; as are the **347 children** in temporary accommodation.

5.9 As such, the aim should be to meet the shortfall in affordable housing provision as soon as possible i.e. over the next five years, in line with the approach set out in the NPPG[5] for overall housing shortfalls. A summary of SoS and Inspectors' appeal decisions that support this approach is provided at **Appendix AG6**.

5.10 To clear the 1,868 dwelling shortfall accumulated between 2022/23 and 2024/25, the Council would need to deliver 1,026[6] net affordable dwellings per annum over the next five years (2025/26 to 2029/30), representing a 57% increase from the annual need of 652 net affordable dwellings identified in the 2023 HEDNA. Without a step change in affordable housing delivery this is unlikely to be realised.

Conclusions

5.11 The evidence presented in this section demonstrates that affordable housing delivery in Epsom and Ewell has consistently fallen well below identified levels of need. Between 2007/08 and 2024/25, the Borough delivered a total of 1,094 net affordable homes, equivalent to an average of 61 dwellings per annum. This level of delivery is substantially

[5] Paragraph: 031 Reference ID: 68-031-20190722

[6] 1,868 / 5 years = 373.6 + 652 = 1,025.6

below the annual need for 652 affordable homes identified in the Council's most recent evidence base.

5.12 The position since the start of the 2023 HEDNA period is particularly acute. Between 2022/23 and 2024/25, only 88 net affordable homes were delivered against an identified need for 1,956 homes, resulting in a cumulative shortfall of 1,868 affordable dwellings. Put another way, only around 4% of identified affordable housing need has been met over the period, with approximately 96% remaining unmet.

5.13 Addressing this shortfall would require a substantial increase in affordable housing delivery. For illustrative purposes, if the accumulated shortfall were to be addressed over the next five years alongside meeting newly arising needs, delivery would need to increase to approximately 1,026 affordable homes per annum. This is significantly above both historic delivery rates and the level of provision currently being achieved within the Borough.

5.14 Taken together, the evidence demonstrates a substantial and growing mismatch between identified affordable housing needs and affordable housing delivery. The scale of the shortfall indicates that existing delivery mechanisms have not been sufficient to meet identified needs and that opportunities to secure affordable housing through new development will continue to play an important role in addressing both current and future affordable housing requirements within Epsom and Ewell.

6. Market Conditions

Introduction

6.1 The NPPF is clear that all households whose needs are not met by the market (either to rent or to buy) are considered to be in affordable housing need. This section analyses past and current market conditions in both the rental and ownership segments of the market to understand the nature of the housing market in the Borough.

Private Rental Market

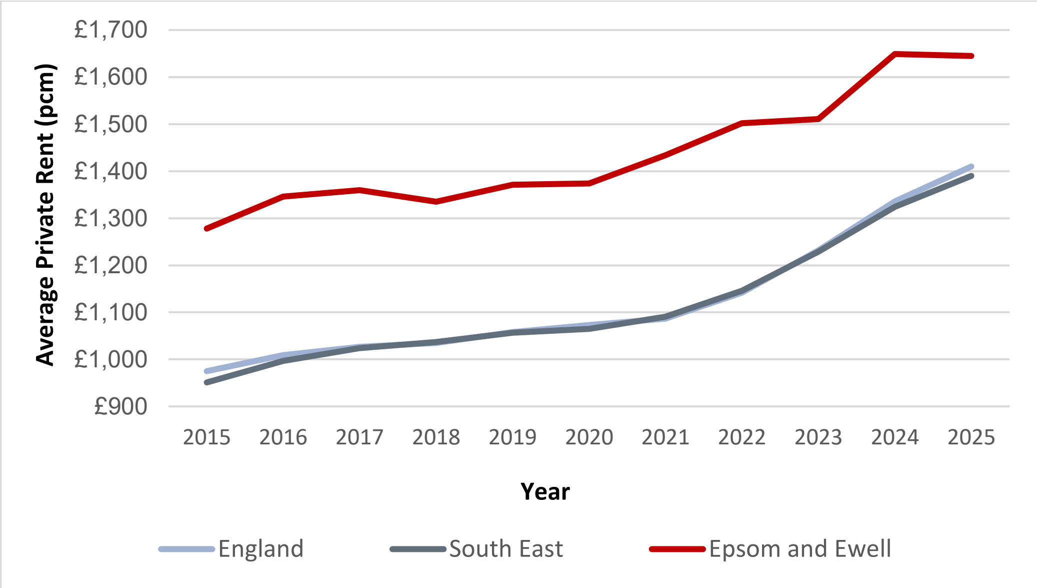
6.2 The following analysis relies on the Office for National Statistics (ONS) Price Index of Private Rents first published in 2015[7]. The data includes both existing and new lets, meaning the values shown may not fully reflect costs faced by new tenants in the Borough.

6.3 Figure 6.1 below shows the trends in average private rents across the Borough over the ten year period from 2015 to 2025. This illustrates how overall rental prices have changed in the local market over time.

- Average private rents in Epsom and Ewell increased from £1,278 per month in 2015 to £1,645 per month in 2025, representing growth of 29% over the period.
- Rental costs have increased in every year since 2018, reaching a peak of £1,649 per month in 2024, before remaining broadly stable in 2025.
- Whilst rental growth in Epsom and Ewell (29%) has been lower than that recorded across both the South East (46%) and England (45%), rents in the Borough remain substantially higher in absolute terms.
- In 2025, average rents in Epsom and Ewell were 18% higher than the South East average (£1,390) and 17% higher than the England average (£1,410).
- Average rents in Epsom and Ewell have consistently exceeded both regional and national averages throughout the period, demonstrating the relatively high cost of accessing accommodation within the Borough's private rented sector.
- The persistence of these elevated rental costs is likely to place increasing pressure on households unable to access owner occupation, particularly lower-income households and those seeking to form new households.

[7] ONS discontinued the publication of lower quartile and median private rental market statistics in December 2023.

Figure 6.1: Average Private Rents (pcm), 2015 to 2025



Source: ONS Open Data.

6.4 Table 6.1 below shows average rents in Epsom (where the appeal site is located) for a range of property types in July 2026, using data taken from Home.co.uk.

Table 6.1: Average Private Sector Rents (New Lets), July 2026

Size of Property	No. of properties Advertised	Average Rent (pcm)
1-bedroom home	58	£1,372
2-bedroom home	56	£1,758
3-bedroom home	29	£2,544
4-bedroom home	34	£3,346
5-bedroom home	9	£3,299

Source: Home.co.uk.

6.5 The rental differentials between property sizes are substantial. Whilst the Borough-wide average rent of £1,645 pcm provides a useful indication of overall market conditions, the Home.co.uk data demonstrates that the cost of securing a new tenancy varies significantly by dwelling size. In particular, rents for larger homes are materially above the Borough average, reflecting the premium attached to family-sized accommodation within the local market.

6.6 Whilst the average rent for a one-bedroom property (£1,372 pcm) falls below the Borough-wide average, rents increase sharply as property size increases. Average rents rise to £1,758 pcm for a two-bedroom property, £2,544 pcm for a three-bedroom property and £3,346 pcm for a four-bedroom property. This means that households seeking family-sized accommodation in the private rented sector face rental costs that are between 55% and 103% higher than the Borough-wide average rent, creating significant affordability barriers for households unable to access owner occupation or affordable housing.

6.7 Taken together, the evidence demonstrates that Epsom and Ewell is characterised by a high-cost private rented sector. Average rents have increased by 29% since 2015 and remain significantly above both regional and national averages. At the same time, the cost of securing a new tenancy (particularly for family-sized accommodation) is substantially higher than the Borough-wide average, with three- and four-bedroom homes commanding rents in excess of £2,500 pcm and £3,300 pcm respectively. These rental costs are likely to be beyond the reach of many households on lower and moderate incomes, increasing pressure on the affordable housing sector and reinforcing the need for a continued supply of affordable homes within the Borough.

Homeownership Market

6.8 The ONS publishes annual house price and earnings data for affordability ratios at the lower quartile and median levels. The median affordability ratio is a key component in the Standard Method calculation for determining Local Housing Need.

6.9 Lower quartile and median house price data is also produced for Middle Layer Super Output Areas (MSOAs)[8]. The appeal site sits within Epsom Downs and Common (MSOA Epsom and Ewell 009). Earnings data is not published below local authority level.

Lower Quartile House Prices

6.10 Figure 6.2 below identifies the following trends in lower quartile house prices, representing entry-level housing costs, across the Borough since the start of the Core Strategy period in 2007:

- Lower quartile house prices in Epsom and Ewell increased from £225,000 in 2007 to £380,000 in 2025, representing growth of 69% over the period.

- Entry-level house prices increased particularly rapidly between 2014 and 2021, rising from £260,000 to £383,750, an increase of almost 48% in seven years.

- Whilst lower quartile prices have remained broadly stable since 2021, they continue to be substantially above historic levels and remain beyond the reach of many first-time buyers.

- In 2025, the lower quartile house price in Epsom and Ewell (£380,000) was 34% higher than the South East average (£284,000) and 85% higher than the England average (£204,995).

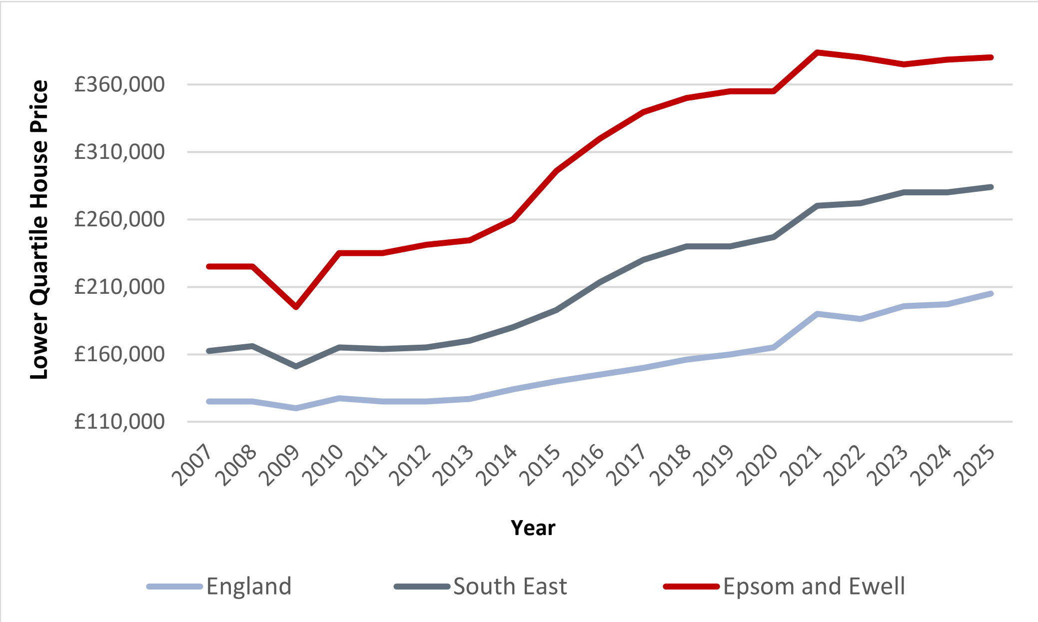
- Lower quartile house prices in the Borough have consistently exceeded both regional and national averages throughout the period, demonstrating the premium associated with accessing owner occupation in Epsom and Ewell.

[8] A geographical unit in England and Wales used by the ONS for publishing small-area statistics, typically combining 4-5 Lower Layer SOAs (LSOAs) to cover 5,000-15,000 residents and 2,000-6,000 households

- Although percentage growth in lower quartile prices in Epsom and Ewell (69%) has been marginally lower than that recorded across the South East (75%), the Borough started from, and continues to maintain, a significantly higher price base.

- The sustained gap between local, regional and national house prices indicates that entry-level home ownership remains particularly challenging for households seeking to access the housing market within the Borough.

Figure 6.2: Lower Quartile House Prices, 2007 to 2025



Source: ONS Open Data.

6.11 It is important to consider lower quartile house prices in context of lower quartile incomes. Figure 6.3 below compares the workplace-based lower quartile affordability ratio for Epsom and Ewell against regional and national averages over the period, highlighting the following trends:

- The lower quartile affordability ratio in Epsom and Ewell increased from 10.92 in 2007 to 13.05 in 2025, representing an overall increase of 20% over the period.

- Affordability pressures intensified significantly between 2013 and 2022, with the ratio remaining above 14.0 throughout the period and peaking at 16.74 in 2019.

- Although affordability has improved since its 2019 peak, the 2025 ratio of 13.05 remains substantially above historic levels and indicates that entry-level housing remains largely inaccessible to many lower-income households.

- In practical terms, lower quartile house prices in 2025 were equivalent to more than 13 times lower quartile workplace earnings in Epsom and Ewell.

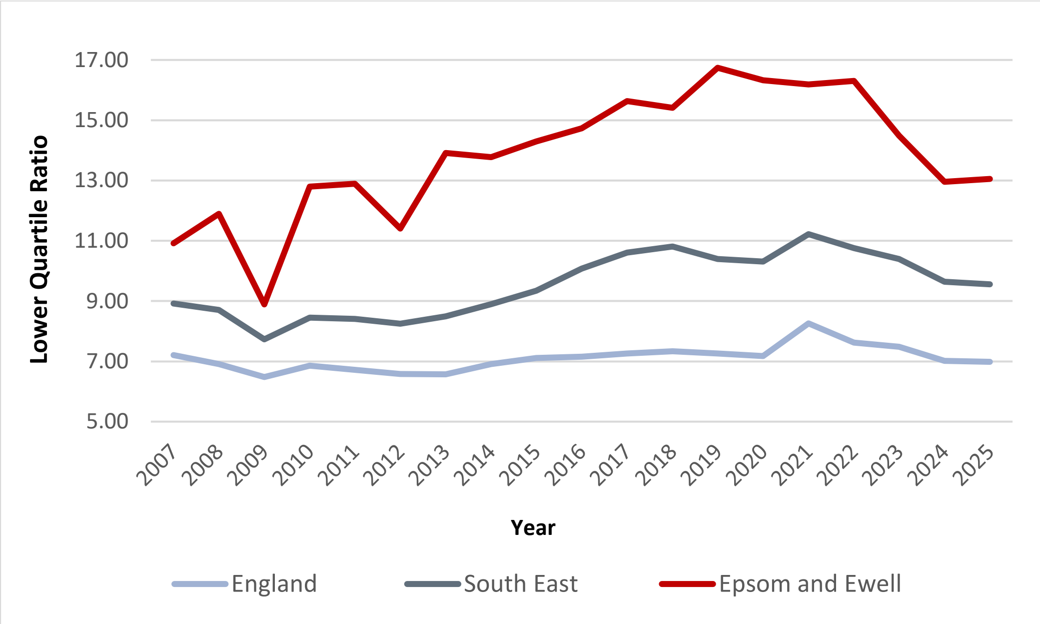
- The Borough's affordability ratio has consistently exceeded both regional and national averages throughout the period, demonstrating that affordability pressures are more acute locally than elsewhere.

- In 2025, the lower quartile affordability ratio in Epsom and Ewell (13.05) was 37% higher than the South East average (9.56) and 87% higher than the England average (6.98).

- Whilst affordability ratios have fallen in both England and the South East since their post-pandemic peaks, affordability in Epsom and Ewell remains markedly worse, reflecting the persistence of exceptionally high house prices relative to local earnings.

- The evidence indicates that owner occupation remains beyond the reach of many households on lower incomes, increasing reliance on the private rented sector and affordable housing products to meet housing needs within the Borough.

Figure 6.3: Lower Quartile Workplace-Based Affordability Ratio comparison, 2007 to 2025



Source: ONS Open Data.

6.12 Figure 6.4 compares lower quartile house prices for Epsom and Ewell with those recorded in Epsom Downs and Common (MSOA Epsom and Ewell 009). The data shows that Epsom Downs and Common is consistently more unaffordable than the Epsom and Ewell average. In particular:

- Lower quartile house prices in Epsom Downs and Common increased from £275,500 in 2007 to £500,000 in 2025, representing growth of 81% over the period.

- This rate of growth exceeds that recorded across Epsom and Ewell as a whole, where lower quartile house prices increased by 69% over the same period.

- Lower quartile house prices in Epsom Downs and Common have consistently exceeded the Borough average throughout the period, demonstrating that entry-level housing within the local area commands a significant premium.

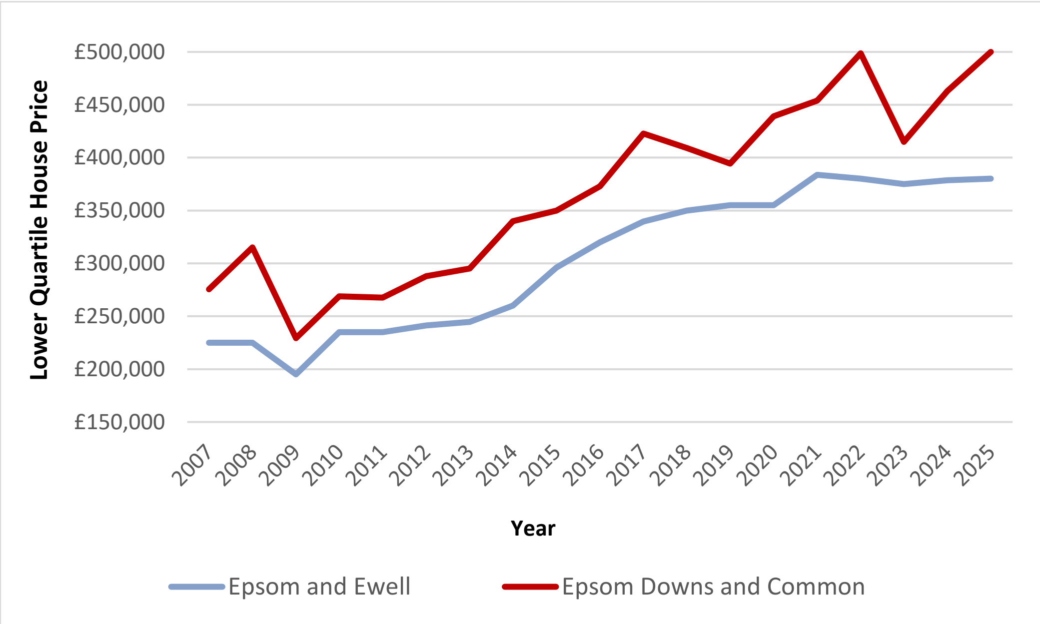
- In 2025, the lower quartile house price in Epsom Downs and Common (£500,000) was £120,000 higher than the Borough average (£380,000), equivalent to a premium of approximately 32%.

- The gap between local and Borough-wide prices has generally widened over time. Whilst lower quartile homes in Epsom Downs and Common were around 22% more expensive than the Borough average in 2007, by 2025 this premium had increased to 32%.

- Lower quartile house prices in Epsom Downs and Common reached £500,000 in 2025, meaning that even the most affordable homes within the local area are likely to be beyond the reach of many households seeking to access owner occupation.

- The evidence demonstrates that affordability pressures in the vicinity of the appeal site are more acute than across the Borough as a whole, reinforcing the importance of delivering a range of affordable housing products to support households unable to access the local housing market.

Figure 6.4: Lower Quartile House Prices in Epsom Downs and Common, 2007 to 2025



Source: ONS Open Data.

6.13 The combined evidence on lower quartile house prices and affordability ratios demonstrates that entry-level home ownership in Epsom and Ewell has remained persistently out of reach for many households throughout the Core Strategy period. Whilst lower quartile house prices have increased substantially since 2007, affordability ratios show that earnings growth has been insufficient to offset these increases. As a result, the Borough has consistently exhibited affordability pressures that are significantly more severe than those experienced across the South East and England.

6.14 By 2025, the lower quartile house price in Epsom and Ewell had reached £380,000, some 34% above the South East average and 85% above the England average. At the same time, the lower quartile affordability ratio stood at 13.05, meaning that entry-level homes cost more than thirteen times lower quartile workplace earnings. Although affordability has improved from its 2019 peak, the Borough remains substantially less affordable than both the South East (9.56) and England (6.98). The evidence therefore indicates that affordability pressures are not simply a product of recent market fluctuations but represent a long-standing and structural characteristic of the local housing market.

6.15 The position is even more acute in the vicinity of the appeal site. Lower quartile house prices in Epsom Downs and Common have increased by 81% since 2007 and reached £500,000 in 2025, around 32% higher than the Borough average. This means that even the most affordable homes available within the local area command prices that are beyond the reach of many households who live or work locally. Taken together, the evidence demonstrates a sustained mismatch between local incomes and entry-level house prices, with particularly acute affordability pressures around the appeal site. In these circumstances, the provision of affordable housing, including affordable home ownership products, is essential if households unable to access the open market are to secure suitable housing within the Borough.

Median House Prices

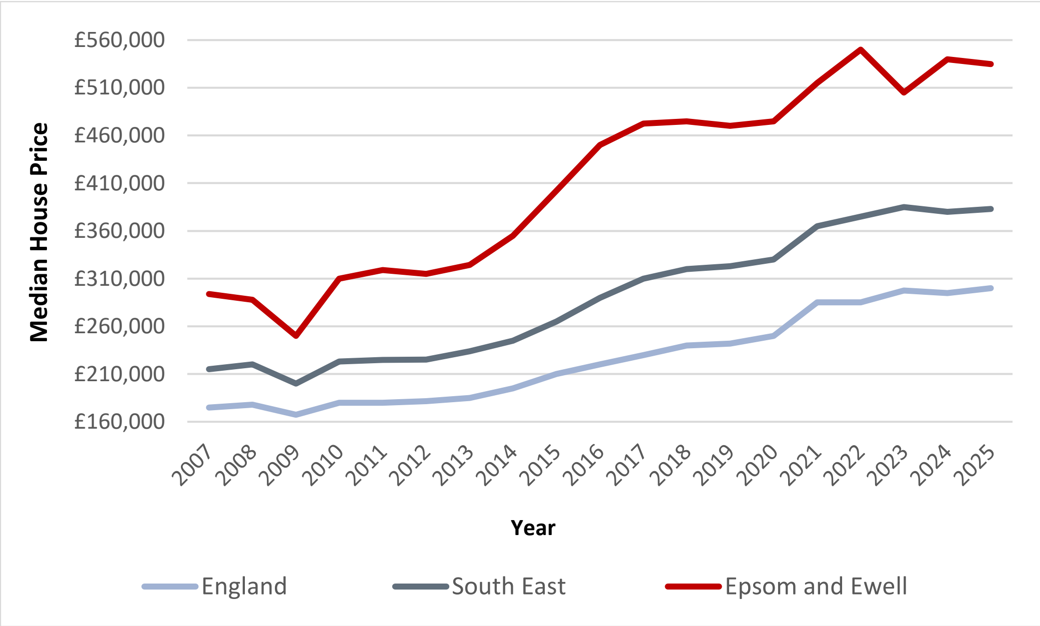
6.16 Figure 6.5 below shows trends in median house prices, representing the midpoint of the housing market, across the Borough since the start of the Core Strategy period in 2007:

- Median house prices in Epsom and Ewell increased from £293,750 in 2007 to £535,000 in 2025, representing growth of 82% over the period.
- The most significant growth occurred between 2013 and 2022, when median house prices increased from £324,500 to £550,000, an increase of almost 70% in less than a decade.
- Although median house prices have moderated slightly since their 2022 peak, values remain substantially above historic levels and continue to reflect the high cost of accessing owner occupation within the Borough.
- In 2025, the median house price in Epsom and Ewell (£535,000) was 40% higher than the South East average (£383,000) and 78% higher than the England average (£300,000).
- Median house prices in the Borough have consistently exceeded both regional and national averages throughout the period, demonstrating that affordability pressures extend beyond entry-level housing and affect the wider housing market.
- Median house prices in Epsom and Ewell have increased at a faster rate (82%) than both the South East (78%) and England (71%), indicating that house price growth within the Borough has outpaced broader market trends.

- By 2025, a typical home in Epsom and Ewell cost more than half a million pounds, underlining the significant financial barriers faced by households seeking to access market housing within the Borough.

- The evidence demonstrates that affordability pressures are not confined to lower quartile households but are evident across the housing market as a whole, reinforcing the importance of affordable housing in meeting local housing needs.

Figure 6.5: Median House Prices, 2007 to 2025



Source: ONS Open Data.

6.17 Analysing the affordability of median house prices requires placing them in the context of median incomes. Figure 6.6 below illustrates the workplace-based median affordability ratio for Epsom and Ewell compared to regional and national averages over the period, highlighting the following trends:

- The median affordability ratio in Epsom and Ewell increased from 11.11 in 2007 to 13.17 in 2025, representing an overall increase of 19% over the period.

- Affordability pressures intensified significantly between 2013 and 2022, with the ratio increasing from 11.46 to 19.35, indicating that median house prices were more than nineteen times median workplace earnings at their peak.

- Although affordability has improved since 2022, the 2025 ratio of 13.17 remains substantially above historic levels and continues to indicate severe affordability pressures within the Borough.

- In practical terms, the median-priced home in Epsom and Ewell in 2025 cost more than 13 times median workplace earnings, highlighting the scale of the challenge facing households seeking to access owner occupation.

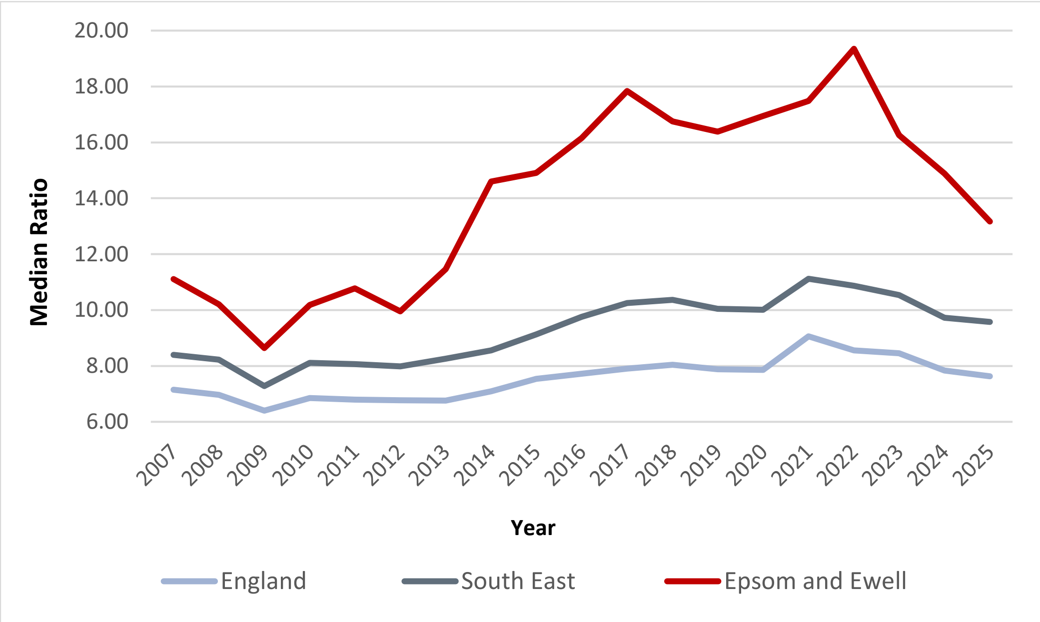
- The Borough's median affordability ratio has consistently exceeded both regional and national averages throughout the period, demonstrating that affordability pressures are materially more acute than elsewhere.

- In 2025, the median affordability ratio in Epsom and Ewell (13.17) was 37% higher than the South East average (9.58) and 73% higher than the England average (7.63).

- Whilst affordability ratios have fallen across all geographies since their post-pandemic peaks, the improvement in Epsom and Ewell has not been sufficient to close the substantial gap between the Borough and wider regional and national benchmarks.

- The evidence demonstrates that affordability challenges are not limited to lower-income households. Even households with median earnings face significant barriers to accessing market housing within the Borough, increasing the importance of affordable housing products that can provide a realistic route into home ownership.

Figure 6.6: Median Workplace-Based Affordability Ratio comparison, 2007 to 2025



Source: ONS Open Data.

6.18 Figure 6.7 compares median house prices across Epsom and Ewell with those recorded within Epsom Downs and Common. As with lower quartile house prices, the data demonstrates that median house prices in Epsom Downs and Common have exceeded the Borough average in the majority of years, reinforcing the scale of local affordability pressures. In particular, the data shows that:

- Median house prices in Epsom Downs and Common increased from £291,000 in 2007 to £601,250 in 2025, representing growth of 107% over the period.

- This rate of growth substantially exceeds that recorded across Epsom and Ewell as a whole, where median house prices increased by 82% over the same period.

- Median house prices in Epsom Downs and Common have exceeded the Borough average in the majority of years since 2007, indicating that the local housing market typically commands a premium over the wider Borough.

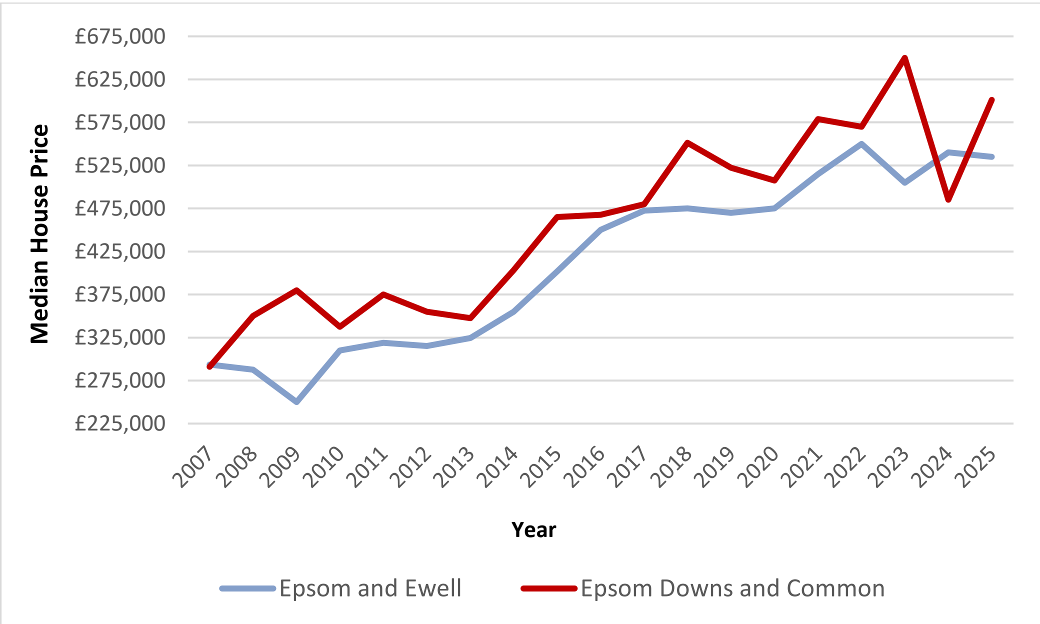
- In 2025, the median house price in Epsom Downs and Common (£601,250) was £66,250 higher than the Borough average (£535,000), equivalent to a premium of approximately 12%.

- The local market has experienced particularly strong price growth in recent years, with median house prices increasing by 19% between 2024 and 2025, compared with a 1% reduction across the Borough as a whole.

- Median house prices in Epsom Downs and Common exceeded £600,000 in 2025, highlighting the exceptionally high cost of accessing market housing in the vicinity of the appeal site.

- The evidence demonstrates that affordability pressures around the appeal site are not confined to entry-level housing but extend across the wider housing market, with both lower quartile and median house prices exceeding Borough-wide averages. This suggests that households across a broad range of income levels face greater barriers to accessing market housing in the local area than elsewhere in the Borough.

Figure 6.7: Median House Prices in Epsom Downs and Common, 2007 to 2025



Source: ONS Open Data.

6.19 The evidence on median house prices and affordability ratios demonstrates that affordability pressures in Epsom and Ewell are not confined to households at the lower end of the income distribution but extend across the wider housing market. Whilst median house prices have increased substantially since 2007, earnings growth has failed to keep pace, resulting in affordability ratios that remain exceptionally high by both regional and national standards. The evidence therefore points to a long-standing and structural affordability challenge affecting households on typical incomes as well as those seeking to access entry-level housing.

6.20 By 2025, the median house price in Epsom and Ewell had reached £535,000, having increased by 82% since 2007. This is substantially above both the South East average (£383,000) and the England average (£300,000). At the same time, the median affordability ratio stood at 13.17, meaning that a typical home cost more than thirteen times median workplace earnings. Whilst this represents an improvement from the 2022 peak of 19.35, affordability remains markedly worse than both the South East (9.58) and England (7.63). The evidence therefore demonstrates that home ownership remains beyond the reach of many households on ordinary incomes despite recent improvements in affordability metrics.

6.21 The position is even more acute in the vicinity of the appeal site. Median house prices in Epsom Downs and Common have increased by 107% since 2007, compared with 82% across the Borough as a whole, and exceeded £600,000 in 2025. Taken together with the lower quartile evidence, this demonstrates that affordability pressures around the appeal site are particularly severe and affect households across a broad range of income levels. The evidence therefore points to a sustained mismatch between local incomes and market house prices, reinforcing the importance of delivering a range of affordable housing tenures to provide realistic housing options for households unable to access the open market.

Conclusions

6.22 The evidence presented in this section demonstrates that Epsom and Ewell is characterised by a high-cost housing market in both the rental and owner-occupied sectors. Private rents, lower quartile house prices and median house prices all substantially exceed regional and national averages, indicating that affordability pressures are not confined to a particular tenure or household group.

6.23 Within the private rented sector, average rents have increased by 29% since 2015 and remain significantly above both South East and England averages. The cost of securing a new tenancy is particularly acute for larger homes, with average rents for three- and four-bedroom properties exceeding £2,500 pcm and £3,300 pcm respectively. These costs are likely to place significant financial pressure on households unable to access owner occupation or affordable housing.

6.24 The evidence relating to home ownership demonstrates similarly acute affordability challenges. Lower quartile house prices reached £380,000 in 2025, whilst median house prices reached £535,000. Affordability ratios remain substantially above regional and national averages, indicating that house prices continue to be significantly out of step with local earnings. In practical terms, both entry-level and typical market homes remain beyond the reach of many households living or working within the Borough.

6.25 Affordability pressures are even more pronounced in the vicinity of the appeal site. Lower quartile house prices in Epsom Downs and Common reached £500,000 in 2025, whilst median house prices exceeded £600,000. This demonstrates that the local housing market surrounding the appeal site is more expensive than the Borough average and that households seeking to access housing in the area face particularly acute affordability barriers.

6.26 Taken together, the evidence points to a sustained and structural mismatch between local incomes and housing costs across both the rental and ownership markets. The persistence of high rents, elevated house prices and exceptionally poor affordability ratios demonstrates that the market is unable to meet the needs of many households within Epsom and Ewell. These affordability pressures provide important context for understanding the scale of affordable housing need identified in Section 4 and the significance of securing additional affordable housing through new development.

7. Summary

Introduction

7.1 Pursuant to Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, when determining planning applications decision makers should first have regard to the relevant Development Plan as a whole, and then to any other material considerations.

7.2 Affordable housing serves a dual role in the planning process. It is both a Development Plan policy requirement and a material consideration. As a material consideration, the provision of affordable housing addresses wider societal needs, including housing affordability and social inclusion, thereby carrying weight in the planning balance.

7.3 In evaluating planning benefits (such as the provision of affordable housing) of a proposal, it is essential to recognise that compliance with policy, whether meeting or exceeding expectations, does not reduce a benefit's weight in the planning balance. Rather, the value of each benefit must be gauged on its own merits, considering the specific policy context and broader implications of the development.

7.4 As underscored in the Vistry Homes Limited and Fairfax Acquisitions Limited v Secretary of State for Levelling Up, Housing and Communities and Others [2024] EWHC 2088 (Admin) High Court Judgment (**CD17.1**) ('the Vistry Judgment'), the fact that a benefit aligns with policy requirements does not make it less significant; it should still contribute meaningfully to the overall planning balance.

7.5 As such, the affordable housing delivery should not be viewed merely as a baseline expectation for compliance with planning policy but as a meaningful benefit that carries weight in decision-making. It is incumbent upon the decision-maker to evaluate the extent to which the affordable housing provision responds to specific needs of an authority, particularly in the context of any existing deficiencies in meeting these needs and/or shortfalls in delivery when ascribing weight in the planning balance.

7.6 This Affordable Housing Proof of Evidence demonstrates that the Council faces significant and growing challenges in meeting its affordable housing needs, both in the rental and ownership markets. The proposed development offers an opportunity to address these challenges.

Affordable Housing Offer

7.7 The proposed development is for up to 110 dwellings, of which 50% (up to 55 homes) are to be provided on-site as affordable housing.

7.8 This level of provision exceeds the expectations of Policy CS9 of the Core Strategy (2007) which seeks 40% provision from qualifying developments. The proposed tenure split of the affordable housing units comprises 71% Social Rent (up to 39 homes) and 29% Shared Ownership (up to 16 homes).

7.9 This level of provision meets the 'Golden Rules' for Green Belt development as set out in the National Planning Policy Framework (NPPF) published in December 2024 which requires affordable housing contributions on such sites to be 15% above the highest existing affordable housing requirement, subject to a cap of 50%.

7.10 The affordable housing provision will be secured through a Section 106 Planning Obligation.

Policy Justification and Material Considerations

7.11 The delivery of affordable housing through the proposed development is strongly supported by both the Development Plan and national planning policy.

7.12 Policy CS9 of the Core Strategy seeks 40% affordable housing on qualifying developments, whilst the proposed development will deliver 50% affordable housing, comprising up to 55 homes. This not only exceeds the adopted policy requirement but also satisfies the affordable housing 'Golden Rules' within the NPPF.

7.13 The benefit arising from this provision must, however, be considered in the context of the scale and nature of affordable housing need within the Borough, rather than simply by reference to whether the proposal meets or exceeds a policy requirement.

7.14 That context is particularly important in Epsom and Ewell. As demonstrated throughout this Proof of Evidence, the Borough has an identified need for **652 affordable homes per annum**, comprising 574 affordable rented homes and 78 affordable home ownership homes. Against this need, only 88 net affordable homes were delivered between 2022/23 and 2024/25, equivalent to just 4% of the 1,956 affordable homes required over that period and resulting in an accumulated shortfall of **1,868 affordable homes**.

7.15 The scale and immediacy of this unmet need is further evidenced by the 1,541 households (not people) on the Council's Housing Register at 31 March 2026, together with the lengthy waiting times experienced by successful applicants, averaging over six and a half years for a three-bedroom affordable home. The consequences of insufficient affordable housing provision are also apparent in the Council's temporary accommodation and homelessness data.

7.16 At 31 March 2025, 274 households were living in temporary accommodation, including 347 children, with 66% of households having remained in temporary accommodation for more than a year. During 2024/25, a further 97 households were owed a homelessness prevention duty and 113 households a relief duty, with the loss of private rented accommodation representing a significant cause of homelessness.

7.17 These needs sit within a housing market characterised by significant affordability pressures. Average private rents remain substantially above regional and national averages, whilst both lower quartile and median house prices remain beyond the reach of many households. These pressures are more acute still in the immediate area surrounding the appeal site. The evidence therefore demonstrates a clear and sustained mismatch between household incomes and housing costs across both the rental and ownership markets.

7.18 The consequences of this persistent under-delivery are not merely numerical but have direct and significant effects on households. In the appeal at Land at Sondes Place Farm, Westcott Road, Dorking **(CD15.5)**, the Inspector observed at paragraph 88 that:

"The consequences of not providing enough affordable homes affect people. Being able to access good housing has a bearing upon everyday life and there are socio-economic effects such as financial security and stability, physical and mental health, decreased social mobility and adverse effects on children's education and development."

7.19 The importance of securing additional affordable housing is further reinforced by the Council's housing land supply position. The Council is able to demonstrate only a 1.49 year supply of housing land and the presumption in favour of sustainable development is therefore engaged. As identified in Section 3, paragraph 11(d)(ii) of the NPPF specifically requires **<u>particular regard</u>** to be given to the provision of affordable homes when applying the presumption.

7.20 As part of the preparation of the Affordable Housing Statement of Common Ground (**CD9.5**), the Appellant sought to agree with the Council the weight that should be attributed specifically to the affordable housing benefit. The Council did not agree that affordable housing should attract its own weighting, taking the position that the delivery of housing should instead be considered collectively under a single weighting. I do not agree with that approach.

7.21 Affordable housing is not simply a component of general housing delivery. The planning system expressly identifies and treats affordable housing as a distinct form of housing provision. If affordable housing were to be treated no differently from market housing in the planning balance, there would be little purpose in the Development Plan containing separate policies directed specifically towards securing affordable housing and assessing affordable housing needs separately from overall housing needs. In Epsom and Ewell, Policy CS9 performs precisely that function, establishing a separate policy requirement for affordable housing alongside the wider objective of delivering housing generally.

7.22 The same distinction is explicit within national policy. Paragraph 11(d)(ii) of the NPPF does not simply require regard to the provision of homes generally; in applying the presumption in favour of sustainable development it expressly requires particular regard to be given to the provision of affordable homes. The express identification of affordable housing within the tilted balance would serve little purpose if its benefits were intended simply to be absorbed within a single undifferentiated weighting for housing delivery. Rather, national policy recognises that affordable housing responds to a particular form of housing need and is therefore a material consideration capable of attracting weight in its own right.

7.23 This approach is reinforced by the Vistry Judgment (**CD17.1**). The Vistry Judgment identifies the matters relevant to assessing the weight to be afforded to that benefit, including the scale and nature of the identified affordable housing need and the extent to which that need has been met through past delivery. In doing so, the Court recognises affordable housing as a benefit which falls to be assessed in its own right. That is also the approach consistently taken in the appeal decisions summarised at **Appendix AG6**, where decision-makers have separately assessed the affordable housing contribution and attributed a specific weight to that benefit having regard to identified need and past delivery.

7.24 There is therefore a clear policy and legal basis for distinguishing between the benefit arising from the delivery of housing generally and the specific benefit arising from the delivery of affordable housing. General housing delivery contributes towards overall housing supply, whilst affordable housing responds specifically to the needs of households whose housing requirements cannot be met by the market. The latter must therefore be assessed having regard to the particular affordable housing circumstances of Epsom and Ewell.

7.25 In this case, the combination of a substantial and longstanding identified need, an acute accumulated delivery shortfall, significant affordability pressures, lengthy waits for affordable housing and the Council's severe housing land supply deficit provides a compelling justification for attaching **substantial positive weight** to the delivery of up to 55 affordable homes. That weight is attributable to the affordable housing benefit in its own right and is additional to the weight to be afforded to the delivery of market housing.

Planning Benefits

7.26 The proposed development directly addresses these critical housing needs by delivering a balanced mix of affordable homes that supports a range of incomes. It aligns with national planning policy objectives, which emphasise meeting housing needs in full and delivering a variety of affordable housing options. The weight of this planning benefit is **substantial** and should be recognised as a key consideration in the determination of this appeal.

7.27 The proposed development offers an exceptional opportunity to deliver urgently needed affordable housing in Epsom and Ewell. By addressing both current and future housing needs, it aligns with local and national policy objectives, representing a sustainable and positive contribution to the Borough's housing market. **Substantial weight** should be given to this benefit in the planning balance.

Appendix AG1: Freedom of Information Response

Response contained overleaf.

Victoria Potts
Deputy Chief Executive and
Director of Environment,
Housing & Regeneration

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www.epsom-ewell.gov.uk
DX 30713 Epsom

Date 3rd August 2026

Your Ref
Our Ref **FOI 260.26 - Housing and Planning Data**

Dear Requester

Thank you for your email to Epsom and Ewell Borough Council dated 22nd June 2026, requesting information under The Freedom of Information Act 2000. The Council aims to respond to requests for information promptly, however on this occasion we have not met the statutory timeframe of twenty working days and for this we sincerely apologise.

We do hold some of the information requested.

<u>Your request is in bold below followed by the Council's response.</u>

<u>You have requested</u>

<u>Housing Register</u>

1. The total number of households on the Housing Register on 31 March 2026:

2. The total number of households with active applications pending acceptance onto the Housing Register on 31 March 2026:

3. How often the Council reviews the Housing Register to remove ineligible applicants:

4. The average waiting times for households to be housed between 1 April 2025 and 31 March 2026 for the following types of affordable property:

Type of affordable property	No. of Lets	Minimum wait	Maximum Wait	Average Wait
1-bed affordable property				

2-bed affordable property				
3-bed affordable property				
4+ bed affordable property				

5. The number social housing re-lets (a property that becomes available for a new tenant when a previous tenant vacates it) between 1 April 2025 and 31 March 2026:

6. The total number of households on the Housing Register on 31 March 2026 specifying the following locations as a preferred choice:

Location	Household Preferences (31 March 2026)
Woodcote & Langley Vale Ward	
College Ward	
Town Ward	
Stamford Ward	

7. The number of properties advertised and the average number of bids per property between 1 April 2025 and 31 March 2026 in the following locations:

Type of affordable property	Woodcote & Langley Vale Ward		College Ward		Town Ward		Stamford Ward	
	No. adverts	Avg. Bids	No. adverts	Avg. Bids	No. adverts	Avg. Bids	No. adverts	Avg. Bids
1-bed affordable property								
2-bed affordable property								
3-bed affordable property								
4+ bed affordable property								
Totals								

8. Any changes made to the Housing Register Allocations Policy since 2011, including:

- Dates each new/ amended Allocations Policy was published.
- Dates each new/ amended Allocations Policy was implemented.
- Description of the changes in each new/ amended Allocations Policy; and
- Copies of each new/ amended Allocations Policy published.

Temporary Accommodation

9. The number of households housed in temporary accommodation within the Local Authority area by other Council's on the following dates:

Date	Total Households
31 March 2025	
31 March 2026	

Housing Completions

10. The number of NET[1] housing completions and affordable housing completions[2] across the Local Authority area over the following monitoring years (1 April to 31 March):

Monitoring Year	Housing Completions (Net)	Affordable Housing Completions (Net)
2025/26		
Totals		

11. The number of NET housing completions and affordable housing completions over the stated monitoring years (1 April to 31 March), provided separately for each of the wards listed below:

- Woodcote & Langley Vale Ward;
- College Ward;
- Town Ward; and
- Stamford Ward.

Monitoring Year	Housing Completions (Net)	Affordable Housing Completions (Net)
2007/08		
2008/09		
2009/10		
2010/11		
2011/12		
2012/13		
2013/14		
2014/15		
2015/16		
2016/17		
2017/18		
2018/19		
2019/20		
2020/21		

[1] Net refers to total (gross) completions minus any losses to stock through demolitions.

[2] As defined by Annex 2 of the National Planning Policy Framework (2024) which can be viewed here.

2021/22		
2022/23		
2023/24		
2024/25		
2025/26		
Totals		

Our response is as follows:

Please find the remaining response from Housing:

1. **The total number of households on the Housing Register on 31 March 2026:** See table below: -

Total no.of Housing Needs Register applicants, corresponding registered bedroom size and assessed banding as at 31/03/26	1-bedroom & sheltered	2-bedroom need	3-bedroom need	4-bedroom (or larger) need	Total applicants on HNR/Band
Total No. of applicants on HNR by property size	**654**	**485**	**318**	**84**	**1541**

2. **The total number of households with active applications pending acceptance onto the Housing Register on 31 March 2026:**

   See above - we cannot retrospectively ascertain the number of active applications pending acceptance as of 31/03/26.

3 **How often the Council reviews the Housing Register to remove ineligible applicants:**

Applications are reviewed on a periodic basis and whenever there is a change of circumstances.

4. The average waiting times for households to be housed between 1 April 2025 and 31 March 2026 for the following types of affordable property:

For applicants on the Housing Needs Register, waiting times vary significantly depending on the size of property required, the number of properties that become available for letting, and the applicant's assessed priority band. The figures in the table below represent the average waiting times (recorded in days) for households that were successfully housed during 2025/26. This includes both social rent and affordable rent properties.

However it should be noted that for applicants newly joining the Housing Needs Register and who are assessed as having a high housing need (Band B), current estimated waiting times are now substantially longer and are approximately:

1-bedroom property: 18 months
2-bedroom property: 5 to 8 years
3-bedroom property: More than 10 years
4-bedroom property: In excess of 150 years

Applicants assessed in lower priority bands have little or no prospects of being offered social housing.

These estimates are based on current levels of housing supply and demand and are subject to change over time.

Type of affordable property	No. of Lets	Minimum wait	Maximum Wait	Average Wait
1-bed affordable property (including sheltered)	53			770 Days
2-bed affordable property	31			1593 Days
3-bed affordable property	13			2377 Days
4+ bed affordable property	0			No 4-bedroom properties became available in 25/26. EEBC would expect approx. one 4-bedroom vacancy every 2 years

5. The number social housing re-lets (a property that becomes available for a new tenant when a previous tenant vacates it) between 1 April 2025 and 31 March 2026:

See above

6. The total number of households on the Housing Register on 31 March 2026 specifying the following locations as a preferred choice:

Pease note that we operate a choice based letting system and do not register applicants' preferences for specific wards. Applicants can bid properties they are interested in. We do therefore do not hold this information for these areas/wards. In addition, we currently have very little social housing in these wards.

Location	Household Preferences (31 March 2026)
Woodcote & Langley Vale Ward	See comments above
College Ward	
Town Ward	

Stamford Ward	

7. **The number of properties advertised and the average number of bids per property between <u>1 April 2025 and 31 March 2026</u> in the following locations:**

   We are unable to provide all this information - See comments in 5 & 6 above. The number of bids on a property is not indicative of demand, as properties are advertised to only specific categories of applicants i.e.- waiting list, transfer or homeless applicants, which then restricts the other categories from bidding on the property.

Type of affordable property	Woodcote & Langley Vale Ward		College Ward		Town Ward		Stamford Ward	
	No. adverts	Avg. Bids	No. adverts	Avg. Bids	No. adverts	Avg. Bids	No. adverts	Avg. Bids
1-bed affordable property	1		1		9		0	
2-bed affordable property	1		0		2		0	
3-bed affordable property	0		0		0		0	
4+ bed affordable property	0		0		0		0	
Totals	2		1		11		0	

8. **Any changes made to the Housing Register Allocations Policy since 2011, including:**

   - **Dates each new/ amended Allocations Policy was published**; See below
   - **Dates each new/ amended Allocations Policy was implemented**; See below
   - **Description of the changes in each new/ amended Allocations Policy; and**
   - **Dec 2016: -**
     - The Council no longer operated an open register, and restrictions were put in placed on who could qualify for social housing with strengthened criteria relating to local connection, financial resources and behaviour.
     - The existing points-based scheme was replaced by a banding scheme.
     - Qualifying applicants are now placed in an application category as either a homeless applicant, a waiting list applicant or a transfer applicant and a quota of properties will be attached to each of the categories.
     - The level of choice available to homeless households living in temporary accommodation was reduced and they are now made one direct offer of suitable accommodation.
     - Reduced priority is given for waiting list and transfer applicants who refuse 3 suitable offers of accommodation.
     - Specific provisions were made for armed forces personnel and right to move applicants
     - Household & property size criteria were reviewed to align them with the DWP Bedroom Standard
   - Oct 2023: -
     - Changes to the qualifying income threshold.
   - **Copies of each new/ amended Allocations Policy published**. See attached

<u>**Temporary Accommodation**</u>

9. **The number of households housed in temporary accommodation within the Local Authority area by other Council's on the following dates:**

We do not hold information on the number of households in temporary accommodation placed in our Local Authority area by other Councils. We have instead provided the number of homeless household Epsom & Ewell BC have in temporary accommodation: -

31 March 2025 = 270
31 March 2026 = 276

Date	Total households
31 March 2025	See above
31 March 2026	See above

Planning Response – question 10 & 11 –

The Council holds information relating to housing completions for the 2025/26 financial year. However, this dataset is not yet complete, as information is still being collected, verified and quality assured.
The requested information is intended for publication as part of the Council's 2025/26 Authority Monitoring Report which is anticipated to be published in October 2026

At the time your request was received, the Council has a settled intention to publish this information, and it is therefore exempt from disclosure under Section 22(1) of the Freedom of Information Act 2000 (Information Intended for Future Publication)

Section 22 is a qualified exemption and is subject to the public interest test. The Council recognises the public interest in openness and transparency regarding housing delivery. However, there is a stronger public interest in ensuring that housing completion data is complete, accurate and published in its final verified form. Releasing incomplete information before the completion of the validation process could result in inaccurate conclusions being drawn from the data.

Having considered the public interest test, the Council has concluded that the public interest in maintaining the exemption outweighs the public interest in disclosure at this time. The information will be made publicly available through the publication of the Council's 2025/26 Authority Monitoring Report in October 2026

Appeals Procedure

I trust that this information satisfies your request. The Council strives to be an open, transparent authority. If you are not satisfied with this response, please note that the Council operates a review procedure, details of which can be found on the Council's website at:
https://www.epsom-ewell.gov.uk/council/about-council/freedom-information

If you are unhappy with the way the Council has dealt with your request, please set out in writing your grounds of appeal within 40 working days of this response and send it to
FOIDPA@epsom-ewell.gov.uk
Please also note that if you have exhausted all internal Council review procedures and you are still not satisfied, you have the right to appeal to the Information Commissioner's Office to independently review the matter.

Details of this procedure can be found on the ICO website: https://ico.org.uk/ The Information Commissioner can also be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or by calling 0303 123 1113 (local rate) Monday to Friday 9am – 5pm.

Yours faithfully

Business Support Officer
Epsom & Ewell Borough Council

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Appendix AG2: Core Documents List

CD4 The Development Plan & Other Policy Documents

Development Plan Documents

Ref.	Document
CD4.1	Epsom & Ewell Core Strategy (2007)
CD4.2	Epsom & Ewell Development Management Policies Document (2015)

Guidance & Evidence Base Documents

Ref.	Document
CD4.4	Developer Contributions SPD (2014)
CD4.17	Epsom & Ewell Authority monitoring Report 2024-2025
CD4.19	Housing and Economic Development Needs Assessment (January 2023)

Emerging Local Plan

Ref.	Document
CD4.20	Proposed Submission Epsom and Ewell Local Plan (2022-2040)

CD5 National Policy and Guidance

Ref.	Document
CD5.1	National Planning Policy Framework (2024)
CD5.2	Draft National Planning Policy Framework for Consultation (2025)

CD6 Appellant's Inquiry Evidence

Proofs of Evidence

Ref.	Document
CD6.2	Planning Proof of Evidence - S.Brown
CD6.3	Affordable Housing Proof of Evidence – A.Gingell

CD9 Statements of Common Ground

Ref.	Document
CD9.1	Planning Statement of Common Ground

CD9.5	Affordable Housing Statement of Common Ground

CD10 Affordable Housing

Ref.	Document
CD10.1	Homelessness & Rough Sleeping Strategy 2022–2027

CD15 Relevant Appeal Decisions

Ref.	Document
CD15.3	Oxford Brookes University, Wheatley Campus, College Close, Wheatley, Oxford OX33 1HX (PINS Ref: APP/Q3115/W/19/3230827)
CD15.5	Land at Sondes Place Farm, Westcott Road, Dorking (Nov 2023) (3324631)

CD16 Written Ministerial Statements

Ref.	Document
CD16.6	“Planning Reform: Next Phase” Written ministerial Statement (16 December 2025)

CD17 Court Judgements

Ref.	Document
CD17.1	Vistry Homes Ltd v Secretary of State for Levelling Up, Housing And Communities & Ors (Rev1) [2024] EWHC 2088 (Admin)

Appendix AG3: Relevant NPPF Extracts

1. The latest National Planning Policy Framework (NPPF) was published on 12 December 2024 and outlines the government's planning policies for delivering affordable housing in England within the broader context of sustainable development (paragraph 8) and in support of the Government's objective of significantly boosting the supply of homes (paragraph 61).

2. Paragraph 8b highlights that the social objective of sustainable development is to *"support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations"*. Whilst paragraph 61 makes clear that:

   *"to support the Government's objective of <u>significantly boosting the supply of home</u>s, it is important that a sufficient amount and variety of land can come forward where it is needed, <u>that the needs of groups with specific housing requirements are addressed</u> […]. **The overall aim should be <u>to meet as much of an area's identified housing need as possible</u>,** including with an appropriate mix of housing types for the local community"* (emphasis added).

3. A significant update pertains to Paragraph 11d(ii), which outlines the presumption in favour of sustainable development where policies are out of date or where a local planning authority cannot demonstrate a five-year supply of deliverable housing sites. Paragraph 11dii emphasizes that in such circumstances permission should be granted unless:

   "(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, <u>having particular regard to key policies</u> for directing development to sustainable locations, making effective use of land, securing well-designed places <u>and providing affordable homes</u>, individually or in combination" (emphasis added).

4. Key provisions in respect of affordable housing include:

   - **Meeting Housing Needs**: Paragraph 61 is clear that in order to support the Government's objective of significantly boosting the supply of homes, the overall aim should be to meet an area's identified housing need in full.

   - **Assessing Housing Needs**: Paragraph 62 emphasises that planning policies should be informed by a local housing needs assessment, whilst paragraph 63 is clear that the size, type, and tenure of housing required for different groups, including those requiring affordable housing should be assessed and reflected in planning policies.

   - **Affordable Housing Provision**: Paragraph 64 states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified.

   - **Thresholds for Provision**: Paragraph 65 indicates that affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas where policies may set out a lower threshold of five units or fewer.

- **Affordable Home Ownership**: Paragraph 66 expects that, for major developments involving the provision of housing, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.

- **Mixed Tenure Sites**: Paragraph 71 is clear that mixed tenure sites can provide a range of benefits, and local planning authorities should support their development through their policies and decisions (although this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported).

- **Definition of Affordable Housing**: Annex 2 of the NPPF defines affordable housing as housing for sale or rent for those whose needs are not met by the market.

5. These provisions are designed to ensure that affordable housing is not only integrated into new developments but also aligns with the evolving needs of diverse community groups, fostering sustainable and inclusive growth for present and future generations.

6. A further notable update is in relation to the 'Golden Rules' for Green Belt development set out in paragraphs 156- 157. Key provisions in respect of affordable housing include:

- **Affordable Housing Contributions:** Paragraph 156 states that major housing development on land released from the Green Belt, or on Green Belt sites subject to a planning application, must provide affordable housing contributions in line with either adopted development plan policies or, where such policies are not yet updated, the requirements of paragraph 157.

- **Minimum Affordable Housing Requirement:** Paragraph 157 requires affordable housing contributions to be set at 15 percentage points above the highest existing policy requirement, capped at 50%. Where no affordable housing policy exists, a default contribution of 50% applies.

- **Viability Assessments:** Paragraph 157 is clear that for land within or released from the Green Belt, site-specific viability assessments must adhere to national planning practice guidance on viability.

7. These provisions ensure that affordable housing delivery remains a core priority within Green Belt developments, balancing housing need with sustainable growth objectives while addressing local and national policy requirements.

Appendix AG4: Relevant NPPG Extracts

Section	Paragraph	Relevant Extracts
Housing and Economic Needs Assessment **What is housing need?**	Paragraph: 001 Reference ID: 2a-001-20241212 Revision date: 12 12 2024	*"Housing need is an unconstrained assessment of the minimum number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations."*
Housing and Economic Needs Assessment **Why is an affordability adjustment applied?**	Paragraph: 006 Reference ID: 2a-006-20241212 Revision date: 12 12 2024	*"An affordability adjustment is applied as housing stock on its own is insufficient as an indicator of future housing need because:* • *housing stock represents existing patterns of housing and means that all areas contribute to meeting housing needs. The affordability adjustment directs more homes to where they are most needed* • *people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.* *The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes."*
Housing and Economic Needs Assessment **What types of households are considered to be in affordable housing need?**	Paragraph: 018 Reference ID: 2a-018-20190220 Revision date: 20 02 2019	*"All households whose needs are not met by the market can be considered in affordable housing need. The definition of affordable housing for planning purposes is set out in Annex 2 of the National Planning Policy Framework."*
Housing and Economic Needs Assessment **How can affordable housing need be calculated?**	Paragraph: 019 Reference ID: 2a-019-20190220 Revision date: 20 02 2019	*"Strategic policy-making authorities will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market. This should involve working with*

		colleagues in their relevant authority (e.g. housing, health and social care departments)."
Housing and Economic Needs Assessment **How can the current unmet gross need for affordable housing be calculated?**	Paragraph: 020 Reference ID: 2a-020-20190220 Revision date: 20 02 2019	*"Strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of:* • *the number of homeless households;* • *the number of those in priority need who are currently housed in temporary accommodation;* • *the number of households in over-crowded housing;* • *the number of concealed households;* • *the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and* • *the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration."*
Housing and Economic Needs Assessment **How can the number of newly arising households likely to be in affordable housing need be calculated (gross annual estimate)?**	Paragraph: 021 Reference ID: 2a-021-20190220 Revision date: 20 02 2019	*"Projections of affordable housing need will have to reflect new household formation, the proportion of newly forming households unable to buy or rent in the market area, and an estimate of the number of existing households falling into need. This process will need to identify the minimum household income required to access lower quartile (entry level) market housing (strategic policy-making authorities can use current costs in this process, but may wish to factor in anticipated changes in house prices and wages). It can then assess what proportion of newly-forming households will be unable to access market housing."*
Housing and Economic Needs Assessment **How can the current total affordable housing supply available be calculated?**	Paragraph: 022 Reference ID: 2a-022-20190220 Revision date: 13 09 2018	*"Assessing the total affordable housing supply requires identifying:* • *the number of affordable dwellings that are going to be vacated by current occupiers that are fit for use by other households in need;* • *suitable surplus stock (vacant properties); and* • *the committed supply of new net affordable homes at the point of the assessment (number and size).* *Sources of data: Ministry of Housing, Communities and Local Government affordable housing supply statistics to show recent trends, and local authority and Registered Social Landlord records including housing register, transfer lists, demolition and*

		conversion programmes, development programme of affordable housing providers. *Total affordable housing stock available = Dwellings currently occupied by households in need + surplus stock + committed additional housing stock – units to be taken out of management"*
Housing and Economic Needs Assessment **How is the total annual need for affordable housing calculated?**	Paragraph: 024 Reference ID: 2a-024-20190220 Revision date: 20 02 2019	*"The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period.* *The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."*
Housing Supply and Delivery **How can past shortfalls in housing completions against planned requirements be addressed?**	Paragraph: 031 Reference ID: 68-031-20190722 Revision date: 22 July 2019	*"Under-delivery may need to be considered where the plan being prepared is part way through its proposed plan period, and delivery falls below the housing requirement level set out in the emerging relevant strategic policies for housing."* "*The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied"*
Neighbourhood planning **How can neighbourhood plans support the provision of affordable homes for sale?**	Paragraph: 100 Reference ID: 41-100-20190509 Revision date: 09 05 2019	*"Neighbourhood plans can support the provision of affordable homes for sale that meet the needs of local people by including relevant policies and site allocations. Depending on the content of relevant strategic policies in the local plan or spatial development strategy, neighbourhood plans may be able to vary the types of affordable housing that will be expected, or to allocate additional sites that will provide affordable housing, where this will better meet the needs of the neighbourhood area."*
Neighbourhood planning **How should a community ensure its neighbourhood plan is deliverable?**	Paragraph: 005 Reference ID: 41-005-20190509 Revision date: 09 05 2019	*"Plans should be prepared positively, in a way that is aspirational but deliverable. Strategic policies in the local plan or spatial development strategy should set out the contributions expected from development. This should include the levels and types of affordable housing required, along with other infrastructure.*

	Neighbourhood plans may also contain policies on the contributions expected from development, but these and any other requirements placed on development should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy. Further guidance on viability is available."

Appendix AG5: Data Tables

Table 1: Gross Additions to Affordable Housing Stock, 2007/08 to 2024/25

Monitoring Period	Total Housing Completions (net)	Gross Additions	Gross Additions as a % of Total Completions
2007/08	318	84	26%
2008/09	258	52	20%
2009/10	140	66	47%
2010/11	288	31	11%
2011/12	261	122	47%
2012/13	489	184	38%
2013/14	203	172	85%
2014/15	172	56	33%
2015/16	131	48	37%
2016/17	279	66	24%
2017/18	132	0	0%
2018/19	137	77	56%
2019/20	157	32	20%
2020/21	101	18	18%
2021/22	117	11	9%
2022/23	317	67	21%
2023/24	138	22	16%
2024/25	112	0	0%
Totals	**3,750**	**1,108**	**30%**
Avg. Pa.	***208***	***62***	***30%***

Source: MHCLG Open Data.

Table 2: Net Additions to Affordable Housing Stock, 2007/08 to 2024/25

Monitoring Year	Total Housing Completions (net)	Gross Additions	LPA Right to Buy Sales	RP Right to Buy Sales	Net Additions	Net Additions as a % of Total Completions
2007/08	318	84	0	Data not available	84	26%
2008/09	258	52	0		52	20%
2009/10	140	66	0		66	47%
2010/11	288	31	0		31	11%
2011/12	261	122	0	0	122	47%
2012/13	489	184	0	2	182	37%
2013/14	203	172	0	1	171	84%
2014/15	172	56	0	1	55	32%
2015/16	131	48	0	2	46	35%
2016/17	279	66	0	3	63	23%
2017/18	132	0	0	2	-2	-2%
2018/19	137	77	0	0	77	56%
2019/20	157	32	0	2	30	19%
2020/21	101	18	0	0	18	18%
2021/22	117	11	0	0	11	9%
2022/23	317	67	0	0	67	21%
2023/24	138	22	0	0	22	16%
2024/25	112	0	0	1	-1	-1%
Total	**3,750**	**1,108**	**0**	**14**	**1,094**	**29%**
Avg. Pa.	***208***	***62***	***0***	***1***	***61***	***29%***

Source: MHCLG Open Data

Appendix AG6: Relevant Decisions Summary

Summary table contained overleaf.

Appeal Ref.	Site Name	Decision Type	Decision	Decision Date	Affordable Housing Offer	Paragraph Ref.(s) / Text	Weight to Affordable Housing
A. APP/K3415/W/ 24/3340089 B. APP/Z3445/W/ 24/3340094	A. Land North of Browns Lane, Tamworth, Staffordshire B79 8UT B. Land North of Browns Lane, Tamworth, Staffordshire B79 8UT	Inspector	A. Allowed B. Allowed	04/10/2024	A. 210 homes (100% provision) B. 210 homes (100% provision)	**IR 69.** It is common ground that The Housing and Economic Development Need Assessment – Update (HEDNA) identifies a net need for 220 new affordable rented homes per annum in LDC between 2016 and 2036, and a net need for 170 new affordable rented homes per annum in TBC between 2016 and 2036. Those assessed needs are across the whole of each administrative area. **IR 70.** Since the HEDNA, new affordable homes in LDC net of Right to Buy (RtB) have averaged 144 per year. This pace of delivery has resulted in a shortfall of -535 affordable homes since 2016/17 which is around -76 affordable homes per year below the identified need. In respect of TBC, new affordable homes net of RtB have averaged 25 per year. This has created a shortfall against the identified need of -1,017 affordable homes with an annual shortfall of -145 homes. **IR 71.** The parties agree that the shortfalls should be dealt with within the next five years. To do so in LDC, the Council need to deliver 327 net affordable homes each year between 2023/24 and 2027/28 (220 +(535/5)). Thereafter the need would reduce and revert to that identified by the HEDNA. **IR 72.** To address TBC's shortfall 373 net affordable homes are needed each year between 2023/24 and 2027/28 (170 + (1,017/5)). For the remaining period up to 2036, the annual need would be 170 affordable homes. **IR 91.** Collectively, for the above reasons, I give the proposed affordable housing provision on the appeal site very substantial positive weight. In reaching this view, I have taken the Council's case at its highest, i.e. the gross affordable housing supply for LDC and TBC.	Very Substantial weight
B. APP/B1930/W/ 22/3312277	B. Land North Of Chiswell Green Lane, Chiswell Green, St. Albans	SoS	B. Allowed	22/03/2024	B. 330 homes (100% provision)	**SoS 29.** For the reasons given in IR586-591, the Secretary of State agrees with the Inspector that in the context of such a great housing need, very substantial weight should be attached to the proposed housing. **IR 193.** Over the nine-year period between 2013/14 and 2021/22, there was a shortfall against that need of 5,053 affordable dwellings, equivalent to 561 per annum. **IR 194.** In the first two years of the 2020 LHNA period since 2020/21, there has been an additional shortfall of 1,428 affordable dwellings, equivalent to 714 per annum. **IR 195.** The agreed approach is that any shortfall in delivery should be dealt with in the next five years. **IR 196.** When the 1,428 dwelling affordable housing shortfall which has accumulated since 2020/21 is factored into the need of 828 affordable dwellings per annum for the period 2020 to 2036, the number of affordable homes that the Council needs to deliver in the 5-year period from 2022/23 to 2026/27 is 5,570, or 1,114 per annum. **IR 197.** The Council's current supply figure for the next five years is, however, just 39 affordable dwellings per annum. **IR 198.** That means there will be a shortfall of 1,075 affordable dwellings per annum, and a total shortfall of 5,375 affordable dwellings over the next five years. **IR 199.** These conclusions are absolutely irrefutable. In St Albans, the delivery of affordable housing has collapsed. Worse still, in refusing permission for the Appeal application, 330 affordable homes in one quick hit, the Council has given up on even attempting to address this affordable housing emergency. **IR 591.** In these respects, the scheme is unusual, but is facilitated by the appellant's desire to meet these particular needs by offering the land for free and discounting all properties by at least 33%, in excess of that required to qualify as affordable housing. Such a scheme is unquestionably a positive aspiration that would go a long way towards boosting the Council's supply of affordable housing. In the context of such a great housing need, I attach very substantial weight to the proposed housing.	Very Substantial weight
APP/C3620/W/ 23/3324631	Land at Sondes Place Farm, Westcott Road, Dorking RH4 3EF	Inspector	Allowed	28/11/2023	72 homes (50% provision)	**IR 85.** Compared to the Core Strategy Policy CS4 target a shortfall of 234 affordable homes has arisen across the current development plan period. The most recent evidence of need [26] points to an increased need for affordable homes (143 dpa). However, in the last three years alone, there has been a shortfall of 396 affordable homes due to the delivery of only 33 dpa in those years.	Very Substantial weight

						IR 86. To clear the backlog 222 affordable homes would need to be delivered each year for the next five years. The number of affordable homes coming forward looks to be substantially below that level of delivery. This will mean the existing shortfall will only become worse. **IR 89.** The proposal would deliver up to 72 affordable homes with a suitable tenure split, which exceeds the 40% on site provision that Core Strategy Policy CS 4 requires. The s106 agreement secures the provision and tenure split. The affordable homes would make a sizeable contribution to addressing the acute and long-established shortfall which will not be fully addressed in the short term. I give the affordable housing provision very substantial positive weight.	
APP/B3410/W/ 20/3245077	Land off Aviation Lane, Burton-upon-Trent	Inspector	Allowed	07/10/2022	128 homes (100% provision)	**IR 8.** The appellant suggests that the Council should recoup the existing shortfall over the next five years, in line with the approach set out in the Planning Practice Guidance (PPG) for overall housing shortfalls. [1] That would result in the need to secure delivery of some 164 dwellings per year over the next five years. The Council, on the other hand, considers that the total amount of required affordable housing, constituting some 1,484 dwellings, would be provided over the whole plan period (2012-2031). In my view, the extent of the shortfall and the number of households on the Council's Housing Register combine to demonstrate a significant pressing need for affordable housing now. As such, I consider that, the aim should be to meet the shortfall as soon as possible. **IR 52.** Planning law requires that applications be determined in accordance with the development plan, unless material considerations indicate otherwise. In this case I have found that the delivery of the site for 100% affordable housing would be a very significant benefit. Indeed, the SOCG sets out agreement that the weight to be afforded to the provision of affordable housing is at least significant. On a straightforward development plan balance, I am firmly of the view that the provision of the affordable housing proposed is a significant material consideration which, in this instance, outweighs the development plan conflict.	Very Significant benefit
A. APP/B1930/W/ 20/3265925 B. APP/C1950/W/ 20/3265926	A. Roundhouse Farm, Land Off Bullens Green Lane, Colney Heath B. Roundhouse Farm, Land Off Bullens Green Lane, Colney Heath	Inspector	A. Allowed B. Allowed	14/05/2021	45 homes – split 50:50 between SADC and WHBC (45% provision)	**IR 53.** The uncontested evidence presented by the appellant on affordable housing for both local authorities illustrates some serious shortcomings in terms of past delivery trends. In relation to WHBC, the affordable housing delivery which has taken place since 2015/16 is equivalent to a rate of 23 homes per annum. The appellant calculates that the shortfall stands in the region of 4000 net affordable homes since the 2017 SHMA Update, a 97% shortfall in affordable housing delivery. If the shortfall is to be addressed within the next 5 years, it would require the delivery of 1397 affordable homes per annum. In SADC, the position is equally as serious. Since the period 2012/13, a total of 244 net affordable homes have been delivered at an average of 35 net dwellings per annum. Again, this equates to a shortfall also in the region of 4000 dwellings (94%) which, if to be addressed in the next 5 years, would require the delivery of 1185 affordable dwellings per annum. **IR 54.** The persistent under delivery of affordable housing in both local authority areas presents a critical situation. Taking into account the extremely acute affordable housing position in both SADC and WHBC, I attach very substantial weight to the delivery of up to 45 affordable homes in this location in favour of the proposals.	Very Substantial weight
APP/Q3115/W/ 19/3230827	Oxford Brookes University, Wheatley Campus, College Close, Wheatley, Oxford Ox33 1hx	SoS	Allowed	23/04/2020	173 homes (35% provision)	**SoS 35.** While he has concluded that the council are able to demonstrate a 5 year supply of housing land, the Secretary of State agrees that, for the reasons given in IR13.97 to 13.102, the proposed development would contribute significantly towards the Council's affordable housing shortfall. Given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, he agrees with the Inspector at IR13.111, that the delivery of up to 500 houses, 173 of which would be affordable, are considerations that carry very substantial weight. **IR 13.98** For South Oxfordshire, the SHMA identifies a need for 331 net affordable homes per annum to deal with the backlog using the Sedgefield approach for the period between 2013 and 2031. [8.87] In the 6-year period since this annual need figure was calculated in the SHMA, a shortfall of -713 affordable homes has accrued as a result of delivery falling substantially short of meeting identified needs. In order to address this backlog, the Council would need to deliver 2,370 net affordable homes over the course of the next 5 years. **IR 13.111** The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight irrespective of the fact that the Council can demonstrate a 3/5YHLS.	Very Substantial weight

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