

Epsom & Ewell Local Plan Examination

Council Responses to Matter 6: Other Housing Policies

12 September 2025

Issue 8: Is the Plans approach to other housing matters justified, effective and consistent with national policy?

Affordable Housing

Q8.1 Is there an affordable housing backlog within the borough and if so what is this?

- 8.1 Yes. The current number of households on the housing register is 1,350 (August 2025) which is an increase from that detailed in the HEDNA (1,200 as of June 2022) para 13.7 p189).
- 8.2 Policy CS9 in the existing Core Strategy has an affordable housing target of 35%. Table 9 in the 2024-2025 AMR, shows 864 affordable units have been built from 2007/8 (adoption of core strategy) to 2024/25).

Q8.2 Document HB03 (HEDNA) sets out that the affordable housing need is 652 homes per annum. What is the total affordable housing need for the plan period? Should this need be identified within the Plan?

- 8.3 While the Council accepts that the “total need” for affordable housing produced using the method set out in the PPG [Ref ID 2a-18 – 2a-24] comes to 11,736 units (651 * 18), it would be inappropriate to use this for the purposes of Plan-making. The PPG [Ref ID 2a-24] states that:
- “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”.*
- 8.4 The total affordable housing need can then be considered in the context of its likely delivery...”

- 8.5 Total need should, therefore, be understood as an indicative annual flow. The reason citing the figure of 11,736 in the PSEELP is inappropriate is that, this is not a need today, but rather a need the great majority of which may accrue over the course of the Plan period.
- 8.6 Secondly, this “total” is based on estimates of the different types of need for affordable homes. Over the Plan period there will be substantial change in factors that determine need in any one year (for example, fewer “newly arising” households falling into need because of improved economic circumstances and/or fluctuations in the supply of affordable housing). As a result, actual need may be greater or less than the “annual flow” in a given year.
- 8.7 Were the figure of 11,736 units to appear in the plan, it is likely to be misconstrued or misrepresented as the number of affordable units that must be delivered if the Council is to meet need.
- 8.8 The extract from PPG reproduced above is clear that once “total need” has been calculated based on current estimates, it should be converted into an annual flow before it is used for the purposes of policy development.
- 8.9 Moreover, treating the figure of 11,736 units the number of affordable homes to be met over the Plan period (i.e., a target) fails to take into account:
- Viability Constraints: The 2022 Viability Assessment (document reference [EV04](#)) demonstrates that while a 40% affordable housing requirement is viable on certain typologies (particularly greenfield and larger sites), it is not universally viable across all development scenarios. Many brownfield and smaller urban sites—particularly those with higher existing use values or abnormal costs—struggle to support even reduced affordable housing contributions. Including the full need figure in the Plan could imply a level of delivery that is not realistically achievable, undermining the soundness of the Plan.
 - The Plan adopts a pragmatic and evidence-led approach to affordable housing delivery. Policy S6 requires 40% affordable housing on greenfield sites and 30% on brownfield sites, for schemes of 10 or more dwellings (or on a site of 0.5ha or more), subject to viability. This is supported by the findings of the Viability Assessment and reflects what can be delivered in practice, rather than in theory. The affordable housing need figure is a theoretical expression of need, not a deliverable target. Including it in the Plan could create a misleading expectation that this level of provision is achievable, which is not the case given land supply, viability, and other constraints.
 - Monitoring and Implementation: The Council will monitor affordable housing delivery annually through the Authority Monitoring Report (AMR), which provides a more appropriate mechanism for tracking delivery against need and adjusting implementation strategies accordingly over the course of the

Plan period. This allows for flexibility and responsiveness to market conditions and funding opportunities.

- **Alignment with National Policy:** The National Planning Policy Framework (NPPF) requires plans to be deliverable and based on proportionate evidence. The inclusion of a gross need figure without a clear delivery mechanism would not align with this principle.

8.10 In summary, while the Council acknowledges the scale of affordable housing need identified in the evidence base, it is not considered appropriate or helpful to include the total figure within the Plan itself. Instead, the Plan focuses on maximising delivery within the bounds of what is viable and achievable, as demonstrated by the supporting evidence.

Q8.3 The PPG states that an increase in the total housing figures included within the Plan may need to be considered where it could help to deliver the required number of homes. Have the Council considered this and if not why not?

8.11 The Council has considered the potential to increase the total housing figure within the Plan, in line with Planning Practice Guidance (PPG) [Ref ID 2a 021], which advises that upward adjustments may be appropriate where they could help deliver the required number of homes, including affordable housing.

8.12 However, the Council has determined that such an increase is neither justified nor appropriate, for the following reasons:

Capacity-Led Strategy:

- The housing requirement set out in the Plan is based on a capacity-led approach, reflecting the Borough's tightly constrained urban environment, extensive Green Belt coverage, and limited availability of suitable and deliverable sites.
- The Land Availability Assessment (LAA, document reference [HB01a](#) & [HB01b](#)) and the site selection process have identified a realistic and achievable supply of sites capable of delivering the proposed housing requirement figure over the plan period, without compromising important environmental and policy constraints.

Affordable Housing Delivery:

- The Council acknowledges the significant affordable housing need identified in the Housing and Economic Development Needs Assessment (HEDNA, document reference [HB03](#)), which equates to 652 dwellings per annum.

- The Plan seeks to maximise affordable housing delivery within the bounds of what is achievable. The Council has considered whether increasing the overall housing figure would materially improve affordable housing delivery. However, given the constraints on land supply and development viability, such an increase would not guarantee a proportionate uplift in affordable housing and could result in unsound allocations.
- The HEDNA does not recommend increasing the overall housing requirement to meet affordable housing need in full. Instead, it recognises that delivery will depend on the proportion of affordable homes secured through market-led development, subject to viability and policy mechanisms:

“Overall, the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue in the Borough. That said, this in itself is not justification for an increase in the HNF to address affordable housing need.” (HEDNA, para. 13.121)

“It is important to note that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. The evidence does however suggest that affordable housing delivery should be maximised where opportunities arise.” (HEDNA, para. 13.122)

8.13 Moreover, it is important to note the PPG [Ref ID 2a 021] does not impose an absolute requirement for the Council to increase the LHNF with the express intent of increasing the supply of affordable homes. If this were not the case, councils would quickly come into conflict with paragraph 11b of the Framework which states that strategic policies should “provide for the objectively assessed needs for housing” unless there are “strong reasons” for restricting the scale of development.

8.14 Also, there are fundamental differences in the methods for calculating the LHNF and the need for affordable homes. While affordable housing need is high in the Borough both in absolute terms and in relation to overall housing need this should not, therefore, be deployed as a reason to increase the housing requirement figure. PPG [Ref ID 67-001] states that the housing need of individual groups (including those in need of affordable housing):

“may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method.”

8.15 The Planning Advisory Service (PAS) identifies two main reasons why the need for affordable homes and the LHNF cannot be ‘arithmetically linked’:

- Affordable need measures needs of existing households falling into need (who will release a home should they move into an affordable dwelling).
- The need arising from newly forming households is already captured in the demographic change embedded within the standard method. Increasing the LHNF to address their need for affordable housing will inevitably result in double counting.¹

- 8.16 As regards the first of these points, Table 42 in the HEDNA (document reference HB03) shows that, where households already living in accommodation are excluded from affordable need, this would reduce net affordable need by 67 units per annum.
- 8.17 Furthermore, the extract from the PPG to which the question alludes [Ref ID 2a 021] takes as its premise that affordable supply arises as a result of mixed market and affordable housing developments. However, the HEDNA (document reference HB03) finds that “PRS forms an important source of supply of affordable housing in the Borough” as result of the benefits system (para 14.46). In reality, the supply of affordable housing comes from a variety of sources, including not-for-profit developers.
- 8.18 Given these circumstances, it would be inappropriate to revisit the overall housing requirement figure in order to increase the supply of affordable homes, given the compelling reasons (cited above) for restricting development in the Borough.
- 8.19 Finally, from a review of Local Plans that have recently been adopted, there are no instances where a council has increased the LHNF solely to increase the supply of affordable housing.
- 8.20 In the three Local Plans identified below in Table M6a, while the Inspector identified the substantial need for affordable homes in relation to the LHNF, no uplift was sought.

Table M6a - Recently adopted Local Plans where no uplift has been applied to LHNF

Local Authority	Date adopted	Affordable need	LHNF	Proportion	Housing requirement figure	Uplift
Bracknell Forest	19/03/2024	338	614	55%	614	0
Crawley	16/10/2024	739	752	98%	314	-438
West Suffolk	15/07/2025	505	765	66%	765	0

¹ Objectively Assessed Need and Housing Targets Technical advice note, second edition, July 2015, paragraphs 9.5-9.7

8.21 Consistency with National Policy:

- a) The Plan is considered to be positively prepared, justified, and consistent with national policy, including the NPPF's requirement for plans to be deliverable and based on proportionate evidence.
- b) The Council has taken a balanced approach that seeks to meet housing needs as far as possible, while ensuring that the Plan remains effective and deliverable over the plan period.

8.22 Sustainability Appraisal:

- a) The Sustainability Appraisal (SA, SD05a) has tested reasonable alternatives, including higher growth scenarios. It concludes that the proposed level of development represents the most sustainable option, given the Borough's constraints.
- b) The SA responds to the issue of uplifting housing numbers to reflect affordable housing need, noting the complexity of the relationship between overall housing need and affordable housing delivery. As referenced in the SA:

“... the question of ‘uplifting’ to reflect affordable housing needs is very complex, as discussed within the HEDNA (2023), and as succinctly explained recently by the West Berks Local Plan Inspector: ‘... *policy SP19 is expected to deliver a total of 2,190 affordable homes on market-led schemes... There would be a nominal deficit of around 3,420 against the identified need for... affordable homes although the link between affordable and overall need is complex as many of those identified as being in need of an affordable home are already in housing.*’”

8.23 Conclusion:

The Council has carefully considered the potential to increase the total housing figure in the Plan. However, based on the evidence and the Borough's constraints, it has concluded that such an increase would not be justified, sustainable, or effective. The Plan is therefore considered sound in this regard.

Policy S5 Housing mix

Q8.4 Will the policy as currently drafted secure the delivery of the right homes to address local needs as envisaged by the Framework?

- 8.24 Yes, the housing mix set out in the policy is informed by the Housing and Economic Development Needs Assessment HEDNA (Document Reference HB03), the policy wording specifically refers to the evidence base and any subsequent update in order to future proof the policy. The Council believes that it will secure, as far as possible, the right types of housing locally in accordance with the evidence base.
- 8.25 The HEDNA (2023) (document reference HB03) assessed local population data in developing the proposed mix of housing identified. This is in accordance with paragraph 63 of the NPPF which states that '*Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies*'.
- 8.26 Development proposals will be expected to meet the mix and type of housing as set out by the policy recommendation, whilst balanced against the material considerations of the site and the policies of the local plan as a whole. There are separate policies within the Local Plan for housing needs including specifically: Affordable Housing (Policy S6), Specialist Housing (Policy S7), Gypsies, Travellers and Travelling Showpeople (Policy S8).

Policy S6 Affordable Housing

Q8.5 Part 1 of Policy S6 sets out a requirement for a 40% affordable housing provision on greenfield sites, with a 30% provision on other sites. Is part 4 of the policy justified?

- 8.27 Yes, we consider that wherever possible affordable housing should be dispersed throughout the site and be indistinguishable from the market units proposed to deliver sustainable and cohesive communities. The Policy provides flexibility from departing from this approach where site specific circumstances demonstrate that this is necessary, there could be the case for flatted schemes where a registered provider may request for management reasons that the affordable units are grouped together.

Q8.6 What amount of affordable housing provision would be met by the proposed strategy identified by this policy?

- 8.28 The estimated amount of affordable housing that will be delivered from the Local Plan is 1,082 homes over the plan period based on the requirements of Policy S6. This equates to 23% of the housing requirement.
- 8.29 However, as the golden rules would apply immediately to planning permissions for Green Belt sites, this figure would increase to 1,220 homes, equating to 26% of the housing requirement. A detailed breakdown of supply is contained in Appendix M6a.

Policy S8 Gypsies, Travellers and Travelling Showpeople

Q8.7 The evidence base (HB04) indicates that in terms of those persons who would meet the definition contained within the Planning for Travellers (PPTS), the need for Gypsy and Traveller accommodation over the plan period is 18 pitches. It appears that site allocation SA35 would address 10 pitches of this need. What sites are the Council proposing to address the remaining need over the plan period?

- 8.30 Following a thorough assessment as to how the Gypsy and Traveller need for 18 pitches could be met in the borough, as documented in the Meeting Gypsy and Traveller Needs Topic Paper (document reference TP05), it has been demonstrated that opportunities for provision are limited. The conclusion was that need was most likely to be met through provision on land currently designated as Green Belt, which may be released through the local plan process, or on unidentified (windfall) sites, which may come forward during the plan period. Several Green Belt sites submitted as part of the Call for Site exercises were assessed and while none of the sites were put forward by the landowner / site promoter for Gypsy and Traveller uses, it was considered that some of the sites may have potential to accommodate such uses as part of a comprehensively designed scheme (Appendix 2, page 27 of the Meeting Gypsy and Traveller Needs Topic Paper (document reference TP05).
- 8.31 As such, the Council has sought to deliver new pitch provision through the allocation of 10 pitches as part of the Horton Farm Allocation, SA35, which is proposed to be released from the Green Belt. There are no further allocations within the Local Plan for Gypsy and Traveller sites. Further provision of Gypsy and Traveller sites may be achieved on appropriate unallocated land through the planning application process. Policy S8 enables such applications to be assessed on a site-by-site basis and allows suitable sites, which meet the criteria, to be permitted. Additionally, Policy S8 requires larger unallocated windfall sites to contribute towards meeting unmet need, where appropriate.

The Council will also continue to work with neighbouring authorities to identify whether this need could be met outside of the borough.

Q8.8 Paragraph 5.50 of the Plan acknowledges that there are unlikely to be sites which would meet the criteria set out within policy S8. Will the policy be effective as a result?

- 8.32 The policy is considered to be effective, providing a clear steer as to what is expected of new traveller site provision in the borough. The Policy recognises that some flexibility may be needed to deliver additional sites to meet need, given the limited availability of suitable, available and deliverable sites, as evidenced by the Meeting Gypsy and Traveller Needs Topic Paper (document reference TP05). Planning applications will be assessed on their own merits.

Policy S7 Specialist Housing

Q8.9 The Vision identifies that new development will meet the needs of the changing population, including those in specialist housing need, from students to older people. In what way will policy S7 achieve this objective?

- 8.33 The existence of the policy itself directs the plan into taking a positive approach to delivering specialist accommodation by stating that such development (the definition of which, is not exhaustive) “will” be permitted.
- 8.34 The conditions under which the policy permits the accommodation (a-h) are considered necessary to guard against inappropriate or proportionally unjustified development, but not overly onerous to the extent that they will affect delivery of such accommodation that meets a genuine need for specialist accommodation.
- 8.35 The Local Plan contains seven allocations (SA7, SA13, SA18, SA28, SA29, SA30 and SA32) that will deliver specialist accommodation over the plan period, demonstrating our commitment to meeting the needs of a changing population.

Q8.10 What is the need for student accommodation provision over the plan period and is the Plan sufficiently clear in this regard? Is the plan positively prepared in this regard, particularly given the acknowledged growth in the student population envisaged by document HB03?

Identified Need for Student Accommodation:

- 8.36 The Council acknowledges the evidence presented in the Housing and Economic Development Needs Assessment (HEDNA, document reference [HB03](#)) regarding the growing demand for student accommodation in the Borough, primarily associated with the University for the Creative Arts (UCA) in Epsom.
- 8.37 The HEDNA (paras. 16.202–16.204) confirms that at the time of its publication:
- a) UCA anticipates 10% annual growth in student numbers over the next three years, equating to approximately 573 additional full-time students.
 - b) UCA has no plans to deliver additional on-campus accommodation but is actively engaging with private providers to bring forward purpose-built student accommodation (PBSA).
 - c) A student accommodation strategy is being prepared by the UCA to provide further evidence of medium-term needs.
- 8.38 The HEDNA also provides a snapshot of current student housing arrangements:
- 23% of students live in HMOs (private rented accommodation)
 - 22% live with parents
 - 19% live alone
 - 18% live in halls of residence
- 8.39 This data demonstrates a clear reliance on the private rented sector, which the Plan recognises as a pressure point in the wider housing market.

Clarity of the Local Plan:

- 8.40 While the Plan does not include a standalone policy on student accommodation, it is considered to be sufficiently clear in its approach to meeting this need through a combination of:
- a) Policy S5 (Housing Mix and Type), which supports a range of housing types and tenures to meet the needs of different groups, including younger people and students.

- b) Policy S7 (Specialist Housing), which provides a flexible framework for the delivery of non-C3 accommodation, including PBSA, where appropriate. The Plan's supportive stance toward windfall and brownfield development, which has already facilitated the delivery of student accommodation to meet needs. Several schemes have been approved, including: 9 West Street (25 bedrooms); Ormonde House (15 units) and a scheme at Sunnybank House for 99 student bedrooms.

Positive Preparation:

8.41 The Plan is considered to be positively prepared in relation to student accommodation for the following reasons:

- a) It is based on robust evidence from the HEDNA, which identifies both current housing patterns and future growth expectations.
- b) It reflects the realities of delivery, acknowledging that most student accommodation in the Borough is and will continue to be delivered by private providers.
- c) It supports the reuse of underutilised sites in sustainable locations, including town centre and edge-of-centre sites, which are well suited to student housing.
- d) It aligns with the Council's wider regeneration objectives, including the Town Centre Masterplan, which previously identified opportunities for student accommodation (e.g. the Gasworks site, though this was ultimately brought forward without PBSA).

8.42 While the Council did not allocate specific sites for student accommodation, this reflects the limited land availability and the market-led nature of PBSA delivery in the Borough. The Council remains open to working with UCA and private developers to bring forward suitable schemes during the plan period.

Conclusion:

8.43 In summary, the Local Plan is sufficiently clear and positively prepared in relation to student accommodation. It is underpinned by evidence, provides a flexible and enabling policy framework, and is already facilitating delivery through the development management process. The Council will continue to monitor student housing needs in collaboration with UCA and respond accordingly through future plan-making and site opportunities.

Q8.11 Is the definition of specialist housing provided within the glossary sufficiently clear and is it consistent with the definition contained within the policy wording?

8.44 The definition in the glossary was incomplete and only referenced specialist housing for older people, this was noted by the Representation REP114 from the University of Creative Arts. The Schedule of Proposed Modifications

(Document Reference SD13) proposes modification PM62 page 19 to the definition to Appendix 1 Glossary for Specialist Housing.

Q8.12 Is the policy clear in terms of the type of specialist housing envisaged by part 2 of the policy or should it be more explicit in this regard?

- 8.45 Part 2 requires development proposals of more than 200 residential units to provide specialist housing in line with part 1 of the policy, where the first criterion refers to meeting an identified need. Whilst the policy does not explicitly state the type of specialist housing to be provided, it is clear that the applicant will need to demonstrate that larger schemes should make a contribution to some form of specialist accommodation in line with the definition.

Q8.13 The policy states that specialist accommodation will only be permitted where it meets an identified need, is this approach consistent with the Framework?

- 8.46 This is consistent with the NPPF and Government objectives of boosting housing supply and the needs of groups with specific housing requirements are addressed. It is important that the right housing meets the needs of the community it serves otherwise provision would be incompatible with the market it serves and may risk housing/accommodation being left unoccupied.

Policy DM1 Residential Space Standards

Q8.14 Do the criteria used within the policy align with the national space standards?

- 8.47 The criteria used within the policy aligns with the nationally described space standards and supports development that exceeds it. Footnote 52 of paragraph 135 (f) in the NPPF identifies that 'policies for housing should make use of government optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties and that policies may use nationally described space standards where the space standard can be justified'.
- 8.48 The policy is informed by the needs identified in the HEDNA 2023 (document reference HB03 paragraphs 16.224 to 16.227 page 317-8) which identifies that the borough has a growing number of older people in the borough who may have mobility issues in the future. Whilst the policy aligns with nationally described space standards the policy also seeks greater provisions as set out in building regulations to provide accessible homes for people at all stages of

life and where mobility needs change. As such, DM1 sets out requirements regarding accessible and adaptable dwellings to meet Building regulations Part M4 (2). The policy also requires that 10% of new market dwellings on sites of 10 or more dwellings meet Building regulations wheelchair adaptable standard M4(3)(a) and for new affordable dwellings to meet accessible compliance standard (M4(3)(b)).