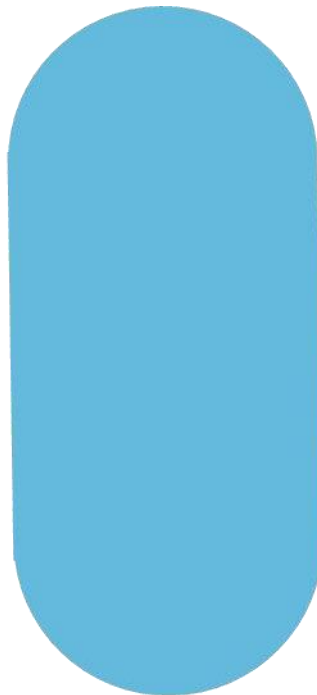




# EPSOM AND EWELL LOCAL PLAN EXAMINATION MATTER 2 HEARING STATEMENT

PREPARED ON BEHALF OF DANDARA SOUTH EAST

September 2025





CONTENTS

	Page No
1. Introduction	1
2. Housing Need and Supply	2



## 1. INTRODUCTION

- 1.1 This Matter Statement has been prepared on behalf of Dandara South East in respect of Matter 2 relating to Housing Need and Supply.
- 1.2 Dandara has land interests in the Borough at Downs Farm, Epsom (hereafter referred to as “the Site”). The Site is not currently identified as an allocation in the draft Plan.
- 1.3 Notwithstanding specific land interests, this Matter Statement has been prepared in objective terms, in response to the Inspectors’ questions and have been considered in the context of the tests of ‘Soundness’. These require that a Plan is:
- Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 1.4 The most recent version of the National Planning Policy Framework was published December 2024 (NPPF 2024). Para 234, within Annex 1, sets out plan-making transitional arrangements which states policies in this version of the Framework apply from 12 March 2025 unless certain criteria apply. In this case, the Plan was submitted ahead of 12 March 2025 and the NPPF December 2023 continues to apply (hereafter referred to as ‘NPPF’). Reference is made to the NPPF 2024 where relevant.



## 2. HOUSING NEED AND SUPPLY

***Q3.1. Policy S1 identifies that the housing requirement for the period 2022-2040 is 4700 homes. This is a shortfall of 5500 homes when considered against the standard method. The Plan makes provision for 4914 homes over the plan period. The Council are not suggesting that an alternative method for the calculation of housing need should be adopted here – is this correct?***

- 2.1 We consider the approach taken by the Council, in adopting the standard method calculation for assessing minimum housing needs, is justified and consistent with national policy.
- 2.2 Para 61 of the NPPF identifies that “exceptional circumstances” need to be established to justify an alternative approach to assessing housing needs. Para 61 states this could relate to “particular demographic characteristics of an area” with reference to an example of an “island with no land bridge that have a significant proportion of elderly residents”. This specific example clearly does not apply for Epsom and Ewell Borough.
- 2.3 It is our view exceptional circumstances do not exist, i.e. the standard method calculation is sound in identifying a minimum housing needs of 573 dwellings per annum over the Plan period.
- 2.4 However, it should be noted this is the ‘capped’ figure, with the uncapped standard method figure equating to 736 dwelling per annum. Further, the post NPPF 2024 standard method calculation equates to 889 dwellings per annum. Whilst the adopted standard method calculation is the correct starting place (as defined by national policy), overall housing need has been established by the updated standard method calculation to be higher. As per para 236 of the NPPF 2024, the Council will be required to commence work on a new Plan almost immediately looking to address this shortfall.
- 2.5 The Council’s evidence base supports the conclusion there are no exceptional circumstances which warrant straying from the standard method. The Housing and Economic Development Needs Assessment (January 2023) highlights how demographic projections are anticipated to change over the Plan period, with the calculated housing needs supporting population growth and expected levels of migration, as well as addressing economic-led and, in part, affordable housing needs.
- 2.6 The Sustainability Appraisal makes clear at para 5.2.8 this position has been established in 2023 and remains up to date. This includes, in response to comments from CPRE, consideration for national population projections which show a rate of population growth higher than previous projections.



***Q3.2. Is the Plan justified in not meeting the full LHN?***

- 2.7 As above, the Plan is underpinned by the correct starting point, i.e. the ‘policy off’ minimum housing need figure as calculated by the Standard Method. Thereafter, in considering the constraints of the Borough, the Plan’s approach seeks to justify a housing requirement below the level of minimum housing needs.
- 2.8 At this point, we do not consider this has been justified on the basis the Council has not properly tested all feasible options through the Sustainability Appraisal for meeting minimum housing needs in full or, at the very least, reducing the gap between supply and needs.
- 2.9 The Council should be seeking to maximise opportunities for growth, looking to every reasonable opportunity to meet housing needs or minimise any unmet needs being generated by the Plan.
- 2.10 The Sustainability Appraisal highlights there are a number of “key reasons for boosting the housing requirement as far as possible”. This includes:
- The new standard method calculation of 889 dwellings per annum;
  - Local housing need figure being a “capped” figure, with the uncapped figure being 736dpa;
  - The Borough’s affordability ratio (median house price to workplace-based earnings) being very high in the context of Surrey and the South East at 16.8 (in the top 10 highest in England);
  - Affordable need exceeding the housing need requirement (at 652 affordable homes per annum), and considerably greater than achieved in recent years (30 affordable homes on average over past 6 years); and
  - Very extensive unmet needs from neighbouring areas.
- 2.11 As drafted, the Plan has not boosted the supply of housing “as far as possible”. It has not struck a justified balance between protecting Green Belt and delivering homes, nor as set out in our Matter 1 statement sought to assess all reasonable opportunities to boosting housing supply and minimising housing shortfall. Instead, it would result in the generation of a significant level of unmet need.
- 2.12 Conversely, for the reasons set out throughout our matter statements, we consider the balance is clearly in favour of releasing additional Green Belt land, including Downs Farm.



2.13 The evidence base, including the Sustainability Appraisal as detailed above, clearly supports the Plan maximising opportunities for housing delivery where these exist. This is supported by the Vision of the Plan, its Objectives and the Council's wider strategic priorities as highlighted in our Regulation 19 representations.

2.14 The Plan should be modified, alongside updates to the supporting evidence base (including Sustainability Appraisal addendum), to allocate Downs Farm, alongside any further suitable sites, in order to reduce unmet needs over the Plan period.

***Q3.3. Does the approach demonstrate that the Plan has been positively prepared in accordance with paragraph 35 of the Framework and will it be objective?***

2.15 No, the Plan is not positively prepared as it does not provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.

2.16 Whilst it may be possible for the evidence base to justify the Plan not meeting local housing needs in full, it has not maximised potential for minimising unmet needs on available and suitable sites nor has sought to properly test all reasonable scenarios.

2.17 Every effort should be made to reduce unmet needs in locations which are supported by the evidence base. Downs Farm, for instance, is identified within the Green Belt study as being a 'lower' performing Green Belt site. There is no logical explanation for its exclusion on the basis of minimising Green Belt release when exceptional circumstances have been justified and other better performing Green Belt sites are identified for allocation.

2.18 The Plan requires modification in order to allocate Downs Farm (alongside other sites if justified) in order to reduce the gap between housing supply and housing needs in order to be as positively prepared as practicable in this instance.