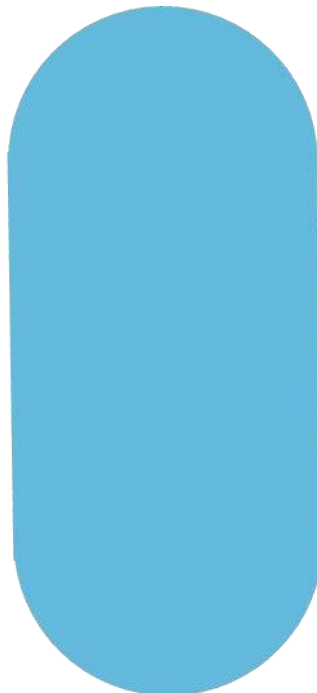




EPSOM AND EWELL LOCAL PLAN EXAMINATION MATTER 6 HEARING STATEMENT

PREPARED ON BEHALF OF DANDARA SOUTH EAST

September 2025





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1. INTRODUCTION

- 1.1 This Matter Statement has been prepared on behalf of Dandara South East in respect of Matter 6 relating to Other Housing Policies of the Epsom and Ewell Local Plan.
- 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. AFFORDABLE HOUSING

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?

- 2.1 Housing and Economic Development Needs Assessment (HEDNA. January 2023) analysis on affordable need identified this to be higher than minimum housing needs (652 affordable dwellings per annum v standard method calculation of 573 dwellings per annum). Para 13.121 highlights:

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

- 2.2 Despite this, the HEDNA concludes there is not justification for increasing housing needs on the basis of affordable needs.

- 2.3 The Sustainability Appraisal acknowledges as a potential justification for exploring setting the housing requirement at a figure above local housing needs with para 5.2.23 – 5.2.24 stating:

The HEDNA (2023) identifies a need for 652 affordable homes per annum, which is in stark contrast to recent delivery over the past three monitoring years of 32 homes per annum (and an even lower average of 30 homes per annum looking back over the past six years).

The PPG is clear that a boost to the housing requirement “may need to be considered where it could help deliver the required number of affordable homes”. However, 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.”

- 2.4 The Sustainability Appraisal concludes, due to identified constraints, that it is “very difficult to envisage any reasonable way” of setting a growth scenario where the housing requirement is set at local housing needs. Therefore, no potential to consider a scenario which goes beyond this to address an uplift for affordability (or another reason).



- 2.5 As set out in our Matter 2 statement, we consider justification may exist for the Plan not meeting minimum housing needs in full. This is for the Council to demonstrate through the evidence base and this has not yet been done. Setting a housing requirement at a level above local housing needs will likely be difficult to achieve however as set out in our matter statements, the relevant scenarios have not been properly tested to reach an accurate conclusion on deliverable housing growth.
- 2.6 Nevertheless, this demonstrates the importance of increasing affordable housing delivery. Past delivery, at circa. 30 – 32 affordable homes per annum as referenced above, is considerably below affordable needs.
- 2.7 Policy S6 requires provision of 40% affordable housing on greenfield sites (>9 dwellings) or 30% on all other sites (>9 dwellings). Whilst increasing affordable delivery, at best this could be expected to yield 100 affordable dwellings a year (based on the housing requirements and identified supply). Still considerably below identified affordable needs.
- 2.8 The Sustainability Appraisal recognises the preferred growth scenario will result in the generation of significant unmet housing needs, there is little confidence this will be provided for elsewhere within a constrained sub-region and affordable delivery will fall well below need (para 9.10.1 – 9.10.2).
- 2.9 The Sustainability Appraisal scoring for housing highlights that all scenarios result in a significant negative effect because of the generation of unmet housing and affordable needs. The negative effect would be 'lowest' for those scenarios which deliver the greater quantum of growth.
- 2.10 As set out throughout our Matter statements, we consider the Council has not struck a justified balance between protecting Green Belt and delivering homes. Further suitable sites, such as Downs Farm, should be allocated in order to increase housing and affordable housing delivery.