

## **Epsom and Ewell Local Plan EIP – Stage 2**

### **Matter 2: Housing need and supply**

*Issue 3: Whether the housing need and supply for the borough and contained within the Plan are positively prepared, justified, effective and consistent with national policy*

3.1 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?

This is for the Council to answer but HBF does not consider an alternative method for assessing housing need should be adopted.

3.2 Is the Plan justified in not meeting the full LHN?

HBF are of the opinion that the local plan could allocate more sites to increase the delivery of housing in Epsom and Ewell over the plan period. The Council state in paragraph 3.32 of TP02 that the overall rationale with regard to site selection, and therefore its ability to meet housing needs, has been to select sites that result in the least harm with most benefit. This would suggest that the council have taken a balanced approach in establishing the number of homes that should be planned for. However, as will be discussed in matter 4, the Council have discounted sites that make a similar contribution to the purposes of Green Belt as those allocated sites that are being removed from the Green Belt. In its decision not to meet housing needs it is therefore the HBF position that the Council failed to undertake a balanced assessments as to the harm from releasing sites set against the potential benefits arising from the delivery of more housing.

The pressing need for new homes in Epsom and Ewell is set out by the Council in their evidence and summarised paragraph 3.3 of the Green Belt Topic Paper (TP02). This paper acknowledges that there has been a historic under delivery of both affordable and market housing against identified needs with the Council being one of the lowest performing in terms of housing delivery against needs over the last three. The consequences of this are increasing levels of homelessness, 1,200 households on the housing needs of register. The impact of low levels of housing delivery can also be seen in the need for affordable housing in Epsom and Ewell which is currently estimated to be 652 dpa (574 dpa for rent and 78 dpa affordable home ownership). This severe shortfall is direct result of the fact that sites that have come forward in Epsom and Ewell have not been able to deliver significant number of affordable homes. The latest AMR sets out these difficulties with Table 9 showing that over the last 5 years affordable housing delivery has averaged just 20 homes – around 2% of the homes built. The acuteness of the need for new market and

affordable homes alongside the lack of available development land elsewhere in the Borough is considered by the Council to justify its decision to amend the Green Belt boundary in Epsom and Ewell.

The need for new homes and lack of other development opportunities to meet those needs must then be set against the harm to the Green Belt from releasing more land for development. What is evident from TP02 is that there are more sites that could be released from the Green Belt where the harm to the overall aims and purpose is considered to be less than or similar to the proposed allocations. As such the harm will not be materially different to the proposed strategy, yet the benefits of releasing more land are significant. The allocation of more sites would increase delivery of market and affordable homes. In particular HBF considers significant weight should be given to the fact that these sites will be able to significantly increase the supply of affordable housing in Epsom and Ewell and in our opinion the harm of releasing more land is not sufficient to justify a shortfall against housing needs of over 50%.

3.3 Does the approach demonstrate that the Plan has been positively prepared in accordance with paragraph 35 of the Framework and will it be effective?

No. While HBF welcome the Council's decision to amend Green Belt boundaries we are of the opinion that more could have been done to try and ensure housing needs are met in full.

3.4 The Planning Practice Guidance (PPG) advises that when preparing strategic policies, it may be concluded that insufficient sites / broad locations have been identified to meet objectively assessed needs, including the identified local housing need. In the first instance, strategic policy-making authorities will need to revisit their assessment, for example to carry out a further call for sites or changing assumptions about the development potential of particular sites, to ensure these make the most efficient use of land. This may include applying a range of densities that reflect the accessibility and potential of different areas, especially for sites in town and city centres, and other locations that are well served by public transport. Has the Council completed this exercise?

For Council.

3.5 Where is the evidence base to support this? As far as I can see, the evidence base in this regard consists of the LAA 2024 (HB01a). The conclusion from this assessment suggests there is insufficient land within the urban area to meet the identified need against the standard methodology of 573 dpa (around 34%). Is this the totality of the evidence in relation to this point?

For Council.

3.6 The LAA 2024 (HB01a) states that it is 'unlikely that increasing the density of potential sites is likely to yield a sufficient amount to address the shortfall, nor would revisiting discounted sites'. What evidence has the Council to support these statements?

For Council.

3.7 Has the Council identified land to accommodate at least 10% of their housing requirement on sites on larger than one hectare, as required by paragraph 70 (a) of the Framework?

For council.

3.8 Could the Council identify which sites make up this requirement and where in the evidence base is the support for the approach put forward?

For council.

3.9 Will the plan provide for a five year supply of deliverable sites upon adoption, with particular reference to the definition of deliverable contained within annex 2 of the Framework?

On the basis of the trajectory included in the local plan the Council will have a five year supply of deliverable sites on adoption.

3.10 Is the trajectory contained within the Plan up to date? The Council should provide any updates which should include identified completions, existing commitments and any other sources of supply the Council are seeking to rely upon.

For council.

3.11 In terms of windfall, paragraph 72 of the Framework advises that where an allowance is made for windfall sites as part of an anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. The housing trajectory includes a windfall allowance of 455 (small windfall) and 407 (large windfall) over the plan period, is this a justified approach to provide separate figures for large and small sites?

No comment.

3.12 Document TP04 explains the approach to large windfall sites. Is this a justified approach given (a) the allocation of sites within the urban area as assessed by the LAA and (b) given the fact that the allocation of town centre sites is the primary source of housing supply over the plan period?

No comment.

3.13 Paragraph 4.4.1 of document TP04 states the Council does not intend to be reliant on the delivery of windfall sites in order to meet the housing requirement. With reference to the housing trajectory presented at appendix 2 of the Plan, is this statement correct?

No comment.

3.14 Section 3.3 of document TP04 considers the sites which have contributed to the largest windfall sites. Please could the Council explain the rationale for the conclusions drawn in relation to the sites considered at paragraphs 3.3.2, 3.3.3, 3.3.5?

No comment.

3.15 If the windfall rate to be applied to this Plan only focuses on small and medium sites, (units 1-9) what would

this mean for the windfall delivery rates to be applied to the housing supply?

No comment.

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