

Epsom & Ewell Local Plan 2022-2040 – Examination  
in Public

# Hearing Statement: Matter 2- Housing Need & Supply

September 2025

## Contents

1.	Introduction/Background .....	2
2.	Response to the Inspectors Questions .....	3
	Stage 2, Matter 2: Housing Need and Supply .....	3
3.	Conclusion.....	6
	Contact .....	7

## Document History

Issue	Date	Issued by	Comment
1.0	08/09/2025	AW/GW	
2.0	09/09/2025	AW/GW	
3.0	1209/2025	AW/GW	Final Version

# 1. Introduction/Background

- 1.1 This hearing statement has been prepared by Savills on behalf of Atkins Properties Ltd, in relation to the Epsom & Ewell Local Plan 2022–2040. It responds to the Inspector’s Stage 2, Matter 2 questions concerning Housing Need & Supply.
- 1.2 Atkins Properties is promoting Land at Downs Road, Epsom (site reference COL023) for residential development. The land comprises four parcels: the northern field, which is proposed for up to 160 homes, and three additional parcels (references COL020, COL021 and WOO019) which are promoted for Green Infrastructure and biodiversity enhancement.
- 1.3 This representation raises fundamental concerns regarding the approach towards Housing Need and Supply in the Local Plan. In particular:
- The Plan proposes to meet less than half of the Borough’s identified Local Housing Need, notwithstanding clear evidence of affordability pressures and persistent under-delivery;
  - The Council’s justification relies heavily on Green Belt constraints, without a proportionate exploration of alternatives;
  - The Sustainability Appraisal has not tested all reasonable alternatives and mischaracterises sites such as Downs Road, as set out in our Matter 1 statement;
  - Affordable housing delivery is negligible, with only two affordable homes completed in 2024/25 against a requirement of 652 per annum.
- 1.4 Collectively, these issues mean that the strategy cannot be considered positively prepared, justified or effective.
- 1.5 This statement provides a response to Inspector’s questions 3.2 & 3.3, and draws on the Regulation 19 representations submitted on behalf of Atkins Properties in February 2025.

## 2. Response to the Inspectors Questions

### Stage 2, Matter 2: Housing Need and Supply

- 2.1 This section responds to the Inspector's questions on objectively assessed housing need, the housing requirement, housing land supply and deliverability. It draws on Savills' Regulation 19 representations, evidence submitted on behalf of Atkins Properties Ltd, and a review of the Council's Stage 1 submissions.
- 2.2 The context is critical. Epsom & Ewell Borough is facing one of the most acute housing pressures in the South East. Household affordability is at a crisis point, with a median affordability ratio of 16.8 (house prices more than sixteen times average incomes). Delivery has persistently fallen short, with a Housing Delivery Test result of 38% in 2023. This is the lowest performance band, triggering the presumption in favour of sustainable development. Against this backdrop, a Plan proposing fewer than half the homes required is incapable of being sound.

#### **Q 3.2 – Is the Plan Justified in not meeting the full LHN?**

- 2.3 The Plan is not justified in not meeting the full Local Housing Need. The minimum Local Housing Need (LHN) is derived from the Standard Method, which the Sustainability Appraisal identifies as 10,242 dwellings (569 per annum) over the plan period, or 13,248 dwellings (736 per annum) without the application of the cap.
- 2.4 The Plan submitted for examination is based on a housing delivery of 4,700 dwellings across the plan period (equivalent to 273 per annum). This is significantly below the LHN.
- 2.5 In effect, the Council proposes to deliver only 46% of the capped LHN and around 35% of the uncapped figure. That scale of shortfall is stark. It is not a marginal deviation from the standard method but a wholesale under-provision which leaves over 5,500 households unplanned for.
- 2.6 At the Elmbridge Local Plan examination, an approach that sought to plan for only around 70% of identified housing need was found unsound, with the shortfall described as "very significant" and requiring an alternative approach. In Epsom & Ewell, the provision is lower still, at only 46% of capped need. A strategy that under-delivers by more than half cannot reasonably be regarded as justified or consistent with national policy.
- 2.7 The Council's justification rests heavily on Green Belt constraints and perceived capacity limits. However, the National Planning Policy Framework (NPPF, December 2023) remains clear that LHN is the "advisory starting point" and that unmet need must be fully evidenced, including through the Duty to Cooperate.

#### **Housing Land Supply**

- 2.8 The Council's own Land Availability Assessment (LAA) (2024) identifies theoretical capacity of 8,301 dwellings across the Borough. This figure is almost double the Plan's proposed requirement. The Council has therefore chosen to suppress capacity rather than maximise it, without a transparent rationale.
- 2.9 This discrepancy is central to the soundness of the Plan. If capacity exists for 8,301 dwellings, there is no evidence-based rationale for setting a requirement of only 4,700. This does not reflect "*meeting as much of the identified need as is reasonable*" in line with national policy. Instead, it appears to represent a political choice to suppress supply. .

- 2.10 Moreover, the proposed buffer is wholly inadequate. A 4.5% margin above requirement is far below the 20% buffer typically sought by Inspectors where there has been persistent under-delivery. With a Housing Delivery Test score of only 38% in 2023, such a minimal buffer cannot be regarded as effective or resilient

### **Affordable Housing Need**

- 2.11 The 2023 Housing and Economic Development Needs Assessment (HEDNA) identified a requirement for 652 affordable homes per annum in the Borough. Over the plan period, that equates to around 11,700 affordable dwellings. By proposing just 273 dwellings per annum in total, the Council has no credible pathway to meet even a fraction of its affordable housing need.
- 2.12 The affordability ratio of 16.8 is a direct reflection of this imbalance. With so few homes planned, supply will continue to lag demand, worsening affordability pressures and undermining the Government's objective of 'significantly boosting the supply of homes'.
- 2.13 In the most recent EEBC AMR (covering the period 1 April 2024 – 31 March 2025) it is identified that only two affordable homes were delivered in the previous year (paragraph 4.13) Against a requirement for 652 affordable homes per annum identified in the 2023 HEDNA. This represents a wholly inadequate level of affordable housing delivery that requires urgent redress through a positively prepared plan.
- 2.14 The Plan cannot therefore be considered to be justified in failing to meet the identified LHN.

### **Green Belt**

- 2.15 Whilst Green Belt is addressed in greater detail as part of the response to Matter 3, it is relevant in considering the manner in which EEBC have justified failing to meet their LHN.
- 2.16 EEBC's justification behind not meeting the LHN is in part due to the need to release Green Belt in order to do so. EEBC's Green Belt Topic Paper (TP02) acknowledges that there has been a historic under delivery of both affordable and market housing against identified needs, and in paragraph 3.3 of TP02 that the Council is one of the lowest performing authorities in this regard.
- 2.17 TP02 identifies that the selection of sites has considered which sites will result in the least harm and deliver the most benefit. However, there remains an evidenced shortfall of all types of housing within the Borough. It is clear from the information contained in TP02 that some sites have been overlooked whilst others - that have been adjudged to be of a comparable level of harm (should development come forward on them) – have been included. Notwithstanding the conflicting rationale behind the selection of some sites over others of a comparable rating, the harm needs to be considered in the context of a significant existing housing need.
- 2.18 Failure to allocate additional sites, including further Green Belt releases where justified, will cause greater harm to the social fabric of the Borough, as households remain unable to access affordable housing. At the Elmbridge examination, unmet need and worsening affordability were recognised as exceptional circumstances warranting targeted Green Belt release. The same circumstances apply in Epsom & Ewell, and Downs Road represents precisely the type of modest and defensible site that can assist in closing the gap.

### ***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 effective?***

- 2.19 The approach undertaken by EEBC does not demonstrate that the Plan has been positively prepared and that it will be effective.

- 2.20 The approach taken in the Sustainability Appraisal (SA) is addressed fully as part of our Hearing Statement for matter 5, but as a key component in assessing potential growth options and allowing for positive preparation of a plan, it is an important consideration in assessing whether a Plan has been positively prepared.
- 2.21 Chapter 5 of the SA seeks to define growth scenarios, with section 5.5 of the SA defining the reasonable growth scenarios. Table 5.2 of the SA: “*The reasonable alternative growth scenarios (with constant supply components greyed out)*” identifies the alternative growth scenarios that have been assessed. It can be observed from the table that Scenarios 4, 5 and 6 have made inconsistent treatment of which sub-areas are included in the assessment scenarios. For example, the ‘south’ sub area is first included in Scenario 3, then not considered in Scenarios 4 and 5, before being included again in Scenarios 6 and 7.
- 2.22 The Non-Technical Summary acknowledges that a “missing scenario” exists — one “*whereby Downs Farm is allocated in addition to Horton Farm (i.e. a scenario in between Scenarios 5 & 6)*”. While we welcome this recognition of the SA’s shortcomings, it is essential to clarify that this should have referred to Downs Road (COL023), which was actively promoted through Regulation 18 and 19 with development proposed only on the northern part of the site.
- 2.23 As set out in our Regulation 19 submissions and as part of our Hearing Statement for Matter 1, the SA scenarios treated site COL023 as though both the northern and southern fields were proposed for development. This is incorrect. Only the northern field has ever been proposed for housing, with the remainder of the land explicitly submitted for biodiversity enhancement and/or public open space. By failing to disaggregate this definition, the SA has assessed COL023 in an unrepresentative and misleading way. This is particularly problematic as the site could make a meaningful contribution to housing supply — potentially in a scenario that sits between Scenarios 5 and 6
- 2.24 These flaws in the evidence base clearly indicate that the Plan has not been positively prepared. The mischaracterisation of sites, inconsistent treatment of scenarios in the SA, and a failure to test reasonable alternatives mean that the spatial strategy is not founded on proportionate evidence. As set out in our Matter 1 statement, the treatment of Downs Road exemplifies this problem.
- 2.25 The Council’s position is one that considers constraints, particularly Green Belt, to be an appropriate justification for a lower housing requirement to be delivered in the Plan. However:
- Green Belt is not an absolute constraint; it is legitimate to review boundaries through the Local Plan process where exceptional circumstances exist;
  - The scale of unmet need, affordability pressures, and evidence of urban capacity together constitute precisely such circumstances;
  - By ignoring these, the Council has set a requirement which is neither justified nor effective; and
  - The NPPF’s test of soundness requires a plan to be positively prepared, justified, effective and consistent with national policy. The proposed housing requirement fails on all counts.
- 2.26 A plan that knowingly under-provides over 50% of its identified LHN cannot be said to be justified, effective, or positively prepared. At a minimum, more sites are required to be included and delivered as part of the Plan. This includes the allocation of more sites located within the Green Belt, and the allocation of the northern field of site COL23.

## 3. Conclusion

3.1 The evidence is clear. The Epsom & Ewell Local Plan :

- Provides less than half of the Borough's identified housing need.
- Ignores capacity identified within the Council's own Land Availability Assessment.
- Fails to plan positively for affordable housing, with only two affordable homes delivered in 2024/25.
- Relies on an inadequate buffer despite a record of under-delivery.

3.2 Unless additional sustainable sites are allocated, including modest Green Belt releases such as Downs Road (COL023), the Plan will not be positively prepared, justified, effective, or consistent with national policy.



# Contact

**Andrew Watson**  
Director

01732789785  
07850311337  
[AJWatson@savills.com](mailto:AJWatson@savills.com)

**Graham Wilson**  
Associate

01732 789755  
07966 633133  
[grwilson@savills.com](mailto:grwilson@savills.com)

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.  
A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD

The Savills logo, featuring the word "savills" in a lowercase, sans-serif font. The letters are a dark red or maroon color. The logo is positioned within a light yellow rectangular box.