

# Epsom and Ewell Local Plan Examination

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**Our ref** 14836/01/SSL/SBi  
**Date** 12 September 2025  
**From** Lichfields on behalf of The Church Commissioners for England ("The Commissioners")  
**ID** 155  
**Subject** **Matter 6: Other Housing Policies**

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## **1.0 Issue 8- Is the Plans approach to other housing matters justified, effective and consistent with national policy?**

### **Affordable Housing**

#### **Policy S5 Housing Mix**

#### **Question 8.4- Will the policy as currently drafted secure the delivery of the right homes to address local needs as envisaged by the Framework?**

- 1.1 Yes. The Commissioners agrees the draft policy wording would secure the delivery of the right homes to address local needs in accordance with Paragraph 60 of the NPPF (2023) which supports an appropriate mix of housing types for the local community.
- 1.2 The supporting text includes a 'recommended mix' at Table S5a. The mix is underpinned by the Council's Housing Economic Needs Assessment (2023 ref. HB03) which assesses the need for different types of housing across the Borough, over the plan period. The draft policy rightly recognises, that should the housing need evidence for the Borough be subsequently updated, this evidence should be used to inform housing mix at the point of a planning application. Further, there is recognition in the supporting text that: *"The mix detailed will not be feasible from all developments sites and it is for this reason that the policy provides flexibility to have regard to the size, characteristics and locations of development sites."* This flexibility is supported by the Commissioners.
- 1.3 Draft Policy S5 is also clear that the housing mix for residential developments *'should have regard to the size, characteristics and location of the site'*. The policy is therefore effective as it is appropriately flexible as drafted allowing for consideration of site-specific characteristics and a housing mix that is appropriate for individual sites and localities. This will allow an appropriate mix to be developed and determined at the specific point in time at which planning applications come forward.
- 1.4 As set out in the Commissioners Regulation 19 representations, the site at Horton Farm (SA35) offers the opportunity to deliver a mix of homes including affordable family homes which would achieve the objectives set out in draft Policy S5 and Paragraph 60 of the NPPF (2023) which seeks to meet as much housing need as possible with an appropriate mix of housing types for the local community.

## Policy S6 Affordable Housing

**Question 8.5- Part 1 of Policy S6 sets out a requirement for a 40% affordable provision on greenfield sites, with a 30% provision on other sites. Is part 4 of the policy justified?**

- 1.5 Part 4 of the draft requires on site affordable housing to be dispersed throughout the site, unless there are specific circumstances which would warrant a different approach. It goes on to state that market and affordable homes should be indistinguishable and achieve the same high-quality design in accordance with Paragraph 135 of the NPPF (2023) which seeks to ensure development proposals are of a high design quality.
- 1.6 The Commissioners understands the principle for affordable housing to be dispersed amongst the market units. However, it is also important to recognise, that registered providers/ affordable housing operators often require the affordable dwellings to be located, in close proximity (in clusters) to each other – this is for maintenance and management purposes. Therefore, the Commissioners considers that it is important that part 4 of draft Policy S6 affords a level of flexibility, but beyond *‘specific circumstances or benefits that would warrant a different approach’*. To be effective, as the request for ‘clusters’ is common, the Commissioners would request the deletion of ‘specific’.
- 1.7 All homes within the Commissioners’ site at Horton Farm will achieve the same high quality standard of design and will be tenure blind – and the Commissioners fully supports this approach within draft Policy S6.

## Policy S8 Gypsies, Travellers and Travelling Showpeople

**Question 8.7- The evidence base (HBo4) 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?**

- 1.8 Draft policy SA35 at Horton Farm, includes a provision for 10 Gypsy and Traveller pitches and associated supporting infrastructure. The Commissioners understands that the Council has a responsibility through the NPPF (2023) (para 63) and the Planning Policy for Traveller Sites (PPTS) and other legal requirements to assess and plan for the housing needs of all residents, and this includes Gypsy and Travellers – and this need is set out in the Epsom and Ewell Gypsy and Traveller and Travelling Show people Accommodation Assessment (GTAA), 2022 (ref.TPO5), which identifies a need for 18 pitches in total across the borough.
- 1.9 As set out in the Commissioners Regulation 19 Representations, there is no in-principle objection to the inclusion of Gypsy and Traveller pitches within the SA35 site – and allowance has been made within the Commissioners’ latest masterplan (see Vision Document February 2025) to accommodate the 10 pitches sought.

- 1.10 However, the Commissioners consider that, should any other suitable, greenfield sites be identified and come forward during the course of the local plan process, then reasonable consideration should be given to whether the 10 pitches can be redistributed across these sites, alongside the additional 8 pitches required over the plan period which have not yet been allocated to a site. This would allow for greater flexibility within the CCE masterplan to deliver the benefits of further high-quality open space, social value, and to optimise the site for the delivery of much needed market and affordable homes.
- 1.11 Further, the reference to a ‘minimum’ of 10 pitches at paragraph 5.46 is not consistent with SA35 or S1 which refer to provision for 10 permanent pitches/0.6Ha. This should therefore be deleted.
- 1.12 It is for the Council to respond regarding its plans to address the remaining need for Gypsy and Traveller pitches across the plan period.

## Policy S7 Specialist Housing

### **Question 8.11- Is the definition of specialist housing provided within the glossary sufficiently clear and is it consistent with the definition contained within the policy wording?**

- 1.13 The Commissioners considers that the definition of specialist housing provided within the draft Plan (between the glossary and policy S7) is broadly consistent with paragraph 63 of the NPPF (2023). The NPPF identifies different groups as *‘those who require affordable housing; families with children; older people...;students; people with disabilities; service families, travellers; people who rent their homes and people wishing to commission or build their own homes.’*
- 1.14 However, the glossary and draft S7 policy definition are not entirely consistent with one another. The glossary definition captures specialist groups in a more succinct manner by stating: *‘housing specifically designated to meet the identified needs of older people and people with support needs. It can include extra care housing’*. Whereas, the definition set out in policy is more specific, and identifies a wider range of groups stating, *‘development proposals for specialist accommodation, such as homes for older people, people with disabilities, students or the neurodiverse’*.
- 1.15 These inconsistencies should be corrected, to ensure the Plan and its policies are ‘unambiguous’ and effective. This proposed modification would provide further clarity to ensure the policy is effective while maintaining a level of flexibility for the type of specialist accommodation to be determined at the application stage.

### **Question 8.12- Is the policy clear in terms of types of specialist housing envisaged by Part 2 of the policy or should it be more explicit in this regard?**

- 1.16 Part 2 of draft policy S8 requires larger-scale new residential development (over 200 C3 dwellings) to incorporate specialist accommodation in accordance with the criteria set out in part 1 of the policy ‘unless there is reasonable evidence that it is not feasible’.

- 1.17 Alongside, SA35 sets out a requirement for ‘some specialist housing’ at the Horton Farm site. SA35 does not commit to a specific type of specialist housing to be provided on the site and this flexibility is welcomed – for example, it is considered that older persons housing is most likely to be appropriate for this site, compared to other specialist housing, but this would most appropriately be discussed and agreed with the Council, at the planning application stage. The Commissioners further note that development proposals for specialist accommodation should provide evidence that it reflects identified need and has had due regard to site-specific characteristics and constraints (part 1 of S7).
- 1.18 However, as set out in the response to Question 8.11, the Commissioners considers that amendments are needed to ensure consistency between the glossary and S7 so that the Policy is clear and effective.
- 1.19 Further, to be effective, it should be made explicit at Part 2 that the provision of specialist housing will not be required for sites of +200 dwellings, should the evidence of local need at the point of a planning application demonstrate that there is no requirement. This will also facilitate consideration of the most appropriate type of specialist accommodation to be determined on a site-by-site basis, at the appropriate stage:

*2) Larger-scale new residential developments (over 200 C3 dwellings) will be required to incorporate specialist accommodation, in line with the above criteria, unless there is reasonable evidence that it is not feasible **and/or local evidence of need at the relevant time demonstrates there is not a requirement.***

**Question 8.13 The policy states that specialist accommodation will only be permitted where it meets an identified need, is this approach consistent with the Framework?**

- 1.20 Yes, the Commissioners supports this approach, which is consistent with the NPPF (2023). Paragraph 63 of the NPPF states ‘*housing need for different groups in the community should be assessed and reflected in planning policies*’.
- 1.21 The Plan is underpinned by the HEDNA (ref HBo3) which establishes the housing need for different groups including older and disabled persons and students. Part 1a of the draft policy S7 requires robust evidence to be submitted to demonstrate that development proposals for specialist housing meets an identified need in the borough.
- 1.22 This general approach is therefore supported by the Commissioners as it will ensure that provision of specialist accommodation is considered against need in the area and it’s the right choice of accommodation for that part of the borough. However, to provide clarity and to ensure the policy is justified, modifications to the policy are proposed to part 2 (which relates to proposals for +200 C3 dwellings) as set out in response to question 8.12 above. This will make it clear that any requirement for specialist housing will be based on the assessment of local need at the time of an application.

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