
EXAMINATION OF THE EPSOM & EWELL BOROUGH COUNCIL

LOCAL PLAN 2022- 2040

MATTER 2: HOUSING NEED AND SUPPLY

**On behalf of Epsom Projects Limited –
Reg. 19 Rep. number: 159**

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Carter Jonas

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1.0 INTRODUCTION

- 1.1 This statement is submitted on behalf of Epsom Projects Limited (“Epsom Projects”) in relation to the Examination in Public of Epsom & Ewell Borough Council’s (‘the Council’) Local Plan 2022-2040 (‘the Local Plan’). Carter Jonas LLP is instructed by Epsom Projects.
- 1.2 Epsom Projects is the owner of Land off Cuddington Glade (**Land Availability Assessment (LAA) reference HOR004 – previously STA013**), which we can confirm remains available for development, and we firmly believe that it is suitable and achievable for much needed new homes. The Council’s ‘headline’ assessment of the site as recorded on the LAA Interactive Map, is as follows:
- “The site is in the GB [Green Belt], exceptional circumstances would need to be demonstrated for the site to be considered suitable.”*
- 1.3 Epsom Projects notes that in the Local Plan exceptional circumstances are cited to enable the review of Green Belt boundaries. Epsom Projects is therefore left somewhat bemused, and disappointed, by the fact that Land off Cuddington Glade is not proposed as a development site allocation.
- 1.4 In addition, post the publication of the revised National Planning Policy Framework (“the Framework”) in December 2024, the plan and its evidence have a significant omission, and that is that it does not consider **Grey Belt** land. It is Epsom Projects’ strongly held view that land off Cuddington Glade is Grey Belt land, and this is supported by the Council’s own analysis (a matter we return to later in these submissions).
- 1.5 The site should be allocated for residential development.
- 1.6 Epsom Projects made representations in response to the consultations held on the informal (Regulation 18) Plan and the Publication Plan (Regulation 19) consultation on the Local Plan.
- 1.7 In this submission, Epsom Projects sets out its responses to Matter 2: Housing Need and Supply.
- 1.8 This statement should be read in combination with Epsom Projects’ responses to the Inspector’s other Matters.

Background

Land off Cuddington Glade - Site Context

- 1.9 The Site is located to the southwest of Epsom town centre and within what was formerly known as the Hospital Cluster, part of Epsom’s historic psychiatric facility that accommodated five hospitals and various ancillary grounds. The conversion and redevelopment of the Hospital Cluster into predominantly residential dwellings was an important part of the spatial strategy of the Core Strategy 2007.
- 1.10 The Council’s evidence continues (as it has over the lifetime of plan drafting since 2017/18) to demonstrate that the site performs very poorly against the functions of the Green Belt, and there are exceptional circumstances cited in the Local Plan which would support its removal from the designation. Moreover, the Government’s introduction of the Grey Belt into national policy also suggests that the site could be developed, because it would not be an inappropriate use of Green Belt land.

- 1.11 The Site can deliver a high quality new residential neighbourhood that responds positively to its surroundings, whilst creating open space benefits for new and existing residents.
- 1.12 The site will comply with the 'Golden Rules' of delivering housing on (former) Green Belt sites.
- 1.13 The key benefits can be summarised as follows:
 - 1. Delivery of up to 50 new homes, including a mix of market and affordable housing to meet the local need identified by Epsom & Ewell Borough Council.
 - 2. Creation of usable open space for leisure, recreation, health and wellbeing including the provision of a new outdoor gym that can be utilised by new and existing residents.
 - 3. Enhancement to the existing network of footpaths and cycleways that bound the Site to improve usage by new and existing residents and reduce reliance on car use.
 - 4. Creation of a development layout that is responsive to the Site's constraints and opportunities, including the retention of important trees and existing vegetation.
 - 5. Include areas for surface water management to ensure that flood risk is not increased in areas outside of the Site.

2.0 ISSUE 3: WHETHER THE HOUSING NEED AND SUPPLY FOR THE BOROUGH AND CONTAINED WITHIN THE PLAN ARE POSITIVELY PREPARED, JUSTIFIED, ELECTIVE AND CONSISTENT WITH NATIONAL POLICY.

- 2.1 Wates Epsom Projects recognises that Epsom & Ewell is a constrained area for development. There is the Green Belt, ecological constraints, Flood Zones, and the setting of heritage assets that all impact on available development land. The Council appears to have done some work with landowners, and its local authority neighbours to explore options for delivering new homes (including a Green Belt review), however, it is not clear if every avenue has been properly explored and that 'no stone is left unturned' before the 'capacity cap' was identified.
- 2.2 Moreover, nowhere has Epsom Projects been able to find a concise explanation for how or why the requirement of 4,700 new dwellings was alighted upon (or indeed why it is now significantly less than the 5,400 identified in the previous Reg. 18 Local Plan consultation). This figure appears lower than the capacity for development in the borough, but more importantly it is not justified in evidence, and neither is it properly tested in the sustainability appraisal.

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?

- 2.3 This is a matter for the Council to clarify.
- 2.4 Nevertheless, Epsom Projects is firm in its view that the Council should be using the Standard Method as the starting point for identifying its housing needs, and subsequent local plan housing requirement, as is set out in the Framework, and in Planning Practice Guidance, as was explained in the Epsom Projects Reg. 19 submissions.

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

- 2.5 Epsom Projects acknowledges that the Borough is constrained; it is an urban area where additional development land is at a premium, and there are ecological constraints. The Green Belt is also a constraint, but it is being retained in an illogical and inconsistent way. It is accepted therefore, that meeting the *full* LHN might be challenging, but there is significant additional sustainable development capacity in Epsom & Ewell which should be allocated for new homes in the Local Plan.
- 2.6 The capacity shown in the LAA appears to be between 7,551 and 8,301 dwellings in total – that is the 3,272 - 3,567 dwellings in the 'supply' column of table 3, plus the 4,279 – 4,734 dwellings in Appendix 3: List of sites identified in the Green Belt (which includes Land off Cuddington Glade). This would represent up to 81% of the total identified previous LHN of 10,242 dwellings, and up to 52% of the revised LHN of 16,002.
- 2.7 By choosing a housing requirement in the Local Plan of 4,700 new homes, which is just about 30% of the LHN, the Council is failing in its duty to significantly boost the delivery of new homes. moreover, if the Council was to release more sites from the Green Belt – including land off Cuddington Glade – this would come with the policy requirement for 50% Affordable Housing. This would therefore

significantly increase the number of homes becoming available for those who are unable to access the housing market. This should be a key part of the Local Plan strategy.

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?

2.8 No.

2.9 Epsom Projects has been consistently clear in its submissions throughout the Local Plan drafting process; the Council is not doing all it can to meet as much of its housing needs as it can, and this can only be understood as “not positive.”

2.10 While Epsom Projects acknowledge the Council’s decision to review its Green Belt boundaries it has not done enough to release sustainable sites for development that are clearly acceptable according to the Council own evidence, as was set out in Epsom Project’s Reg. 19 submissions.

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?

2.11 This question is primarily for the Council to answer, however, Epsom Projects wishes to make clear that it has long promoted Land of Cuddington Glade to the Council (since 2017/18). Over the years the site has been accepted as developable, it has also been demonstrated as ‘very low scoring’ against the purposes of the Green Belt. At some plan drafting stages, the site has been welcomed by the Council but in the final draft it was not included.

2.12 There are obvious development sites – including Land off Cuddington Glade – which have been left out of the Local Plan without clear justification. Therefore, Epsom Projects suspect that this exercise has not been completed in a satisfactory fashion.

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?

2.13 This is a question for the Council to answer, but the need to ask the question illustrates the challenges that Epsom Projects has faced in trying to understand the justification for the housing requirement in the plan, and its frustrations with the illogical and inconsistent way in which sites have been removed from the Green Belt for allocation (as is set out in the Reg. 19 submissions).

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?

- 2.14 While, based on the trajectory included in the Local Plan the Council will have a five year supply of deliverable sites on adoption, the housing requirement is woefully low, and there is demonstrably more development capacity (see the LAA) in the Borough which should be utilised.

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.

- 2.15 Given the time between writing the plan, submitting it, and now examining it, Epsom Projects expects that the trajectory is now somewhat out of date.
- 2.16 Therefore, Epsom Projects reserves the right to comment further on this matter as and when new / updated evidence is produced.

