

**STAGE 2, MATTER 2:
HOUSING NEED AND
SUPPLY**

**EPSOM AND EWELL
LOCAL PLAN
EXAMINATION**

Land at Ewell East Station (Priest Hill)

Hearing Statement by Carter Jonas

On Behalf of Coldunell Limited

September 2025

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Date: September 2025

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1.0 INTRODUCTION

- 1.1 This Statement has been prepared on behalf of Coldunell, the owner of land adjoining Ewell East Station (Priest Hill).
- 1.2 This Hearing Statement focuses on questions raised by the inspector in the Matters, Issues and Questions (MIQs) in relation to Stage 2, Matter 2: Housing Need and Supply.

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

The standard method identifies that the housing need over the plan period is 10, 242 dwellings, 569 dpa.

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

- 2.1 No, there is no sound or legally compliant basis for the Plan's failure to meet the LHN in full. We are particularly concerned that the Plan only makes provision for no more than 45.9% of the identified needs.
- 2.2 Paragraph 11(b) of the NPPF makes clear that strategic policies "*should, as a minimum, provide for objectively assessed needs for housing and other uses*". We cannot identify any information in the evidence base that demonstrates that a "strong reason" exists or where there would be "significant and demonstrable harm" to exempt the Plan from the application of this national policy. As explained in our Stage 1 Statement, the Plan does not meet the threshold required by paragraph 11(b) for departing from the full LHN.
- 2.3 The only rationale advanced for under-provision appears to be Green Belt constraint, but it fails to be robustly evidenced. With only 42% of Epsom's area being subject to Green Belt, materially less than neighbouring authorities including Guildford (89%), Runnymede (79%), Mole Valley (75%), Spelthorne (65%), Woking (60%), and Elmbridge (57%)¹, these underscores that Green Belt does not justify the scale of under-provision proposed.
- 2.4 It is significant that the housing need in Epsom will only increase with the Government's proposed new standard methodology, which sees the Borough's LHN rise by 56%.
- 2.5 As the SA rightly acknowledges, while the revised standard method may not directly set the requirement figure in the current Plan, it will apply to five-year housing land supply calculations once the Plan is more than five years old. In this circumstance, by providing for less than half of the current LHN, the Plan will inevitably be rendered ineffective in maintaining a deliverable supply of housing land over the medium and longer term, which will be contrary to the sustainability objectives enshrined in paragraph 11 of the NPPF.
- 2.6 The failure to plan positively for housing is not an abstract concern. In 2024/25, only two affordable dwellings were delivered in the Borough. Historically, Epsom has never achieved more than 50% performance against the Housing Delivery Test, with an average of just 37.6% since records began.
- 2.7 A severely contracted housing requirement, coupled with a record of persistent under-delivery, will only exacerbate the local housing crisis making it even harder for households to afford a home that meets their needs where they need it.

Question 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,

¹ Elmbridge Borough Council (2016). Green Belt Boundary Review

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?

- 2.8 No, we do not consider that the Council has adopted a proactive approach either in revisiting its assessments and assumptions, or in optimising the use of sites that are well served by public transport.
- 2.9 As explained in our Stage 1 Hearing Statement, there was no engagement with us to review or optimise the capacity of our site, nor to consider the proposed phased delivery strategy designed to maximise early contributions to supply. At no stage did the Council seek to properly and fully understand the ownership and deliverability of the site prior to its exclusion. Even after repeated attempts on our part to clarify these matters, the position has not been rectified.
- 2.10 It is significant that further work has been undertaken since our Regulation 19 submission to demonstrate the site's deliverability. Given the Borough's acute unmet housing needs, and in order for the Plan to be sound, we respectfully request the Council to revisit their assumptions and undertake a fresh assessment of the Priest Hill site so that its full potential for residential allocation can properly be considered.

Question 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?

- 2.11 Whilst Annex 2 of the Council's Housing Topic Paper (TP03) sets out a housing trajectory, there is no accompanying evidence which provides the necessary justification for that trajectory, as required by Annex 2 of the NPPF and PPG.
- 2.12 In this regard, attention is drawn to PPG (Paragraph: 007 Reference ID: 68-007-20190722), which establishes a high threshold for a site to be treated as "deliverable". This includes robust demonstration of matters such as:

*"current planning status – for example, on larger scale sites with outline or hybrid permission **how much progress** has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the **timescale for approval of reserved matters applications and discharge of conditions**;*

***firm progress being made towards the submission of an application** – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;*

***firm progress with site assessment work**; or*

***clear relevant information** about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects." (our emphasis)*

- 2.13 Our emphasis above highlights the level of detail that national policy expects in order to demonstrate deliverability. The evidence base therefore fails in this regard to demonstrate that each site is realistically capable of being delivered within the trajectory period claimed.

- 2.14 We note that some 95% of the allocations identified for the first five years are situated within urban areas, many of which are presently in active operational use and will therefore entail relocation of existing occupiers, demolition of existing buildings, and in many cases, full remediation works before housing delivery can realistically commence.
- 2.15 As such, we would welcome further evidence from the Council to demonstrate how these factors are considered in the trajectory in the context of the PPG requirements.

Appendix 2: Housing Trajectory

SOURCE	No. of units	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	TOTAL
Completions (2022-2024)	456	317	139																	456
Commitments (April 2024) – (667 with 10% lapse rate = 600)	600			200	200	200														600
Small windfall	455						35	35	35	35	35	35	35	35	35	35	35	35	35	455
Large windfall	407								37	37	37	37	37	37	37	37	37	37	37	407
URBAN SITES (20+)																				
SA1 - Southern Gas Network Site	455					160	200	95												455
SA2 - Hook Road Car Park	150									100	50									150
SA3 - Solis House, 20 Hook Road	20						20													20
SA4 - Bund, Hook Road	20				20															20
SA5 - Epsom Town Hall	90						50	40												90
SA6 - Hope Lodge Car Park	30										30									30
SA7 - Former Police and Ambulance Station Site	47*						47													47*
SA8 - Epsom Clinic	30							30												30
SA9 - Depot Road & Upper High Street Car Parks	100									50	50									100
SA10 - 79-85 East Street	35						20	15												35
SA11 - Finchem House, 2-4 Ashley Road	20					20														20
SA12 - Global House	75								75											75
SA13 - Swail House	45						45													45
SA14 - 60 East Street	30				30															30
SA16 - Land at Kiln Lane	40								40											40
SA17 - Hatch Furlong Nursery	30							15	15											30
SA18 - Land rear of Rowe Hall	96					96														96
SMALL URBAN SITES (5-19)																				
SA15 - Corner of Kiln Lane & East Street (1018 East Street)	5			5																5
SA19 - 7 Station Approach, Stoneleigh	5				5															5
SA20 - Esso Express, 26 Reigate Road	10							10												10
SA21 - Richards Field Car Park	7							7												7
SA22 - Epsell House, Station Road	20						20													20
SA23 - 140-142 Rudge Lane West Ewell Surrey	12			12																12
SA24 - Garages at Somerset Close & Westmorland Close	6					6														6
SA25 - 64 South Street, Epsom	6							6												6
SA26 - 35 Alexandra Road	8					8														8
SA27 - 22-24 Dorking Road	18							18												18
SA28 - 63 Dorking Road	6							6												6
GREEN BELT RELEASE																				
SA31 - Land at West Park Hospital - South	50							50												50
SA32 - Land at West Park Hospital - North	150								50	50	50									150
SA33 - Land at Chantilly Way	30								15	15										30
SA34 - Hook Road Arena	100								40	40	20									100
SA35 - Horton Farm	1,250									50	100	150	150	150	150	150	150	150	50	1,250
Actual / Projection		317	139	217	255	490	417	347	267	377	392	242	222	222	222	222	222	222	122	4,914

Note: Allocations SA29 and SA30 are not listed above as these sites have planning permission and are included in the commitments.
 *85 extra care apartments (C2) is the equivalent 47 C3 dwellings

Table 3 Housing Trajectory (sourced from Proposed Submission Local Plan)

Question 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?

- 2.16 It is of particular concern that the Plan places an excessive reliance on windfall sites to meet its housing requirement, particularly from 2033/34 (Year 9) onwards, when such sites are projected to account for 32% of the annual supply between Years 9 and 16, notwithstanding that only a single formal allocation is identified in the Plan. Reliance on such inherently uncertain sources of housing supply undermines the Plan to be positively prepared and effective in delivering housing over the longer term.
- 2.17 The Council's dependence on windfall sites further accentuates the necessity for additional allocations, especially on Green Belt land and in sustainable locations with strong access to public transport. We therefore submit that the Council should fully reconsider all the reasonable site options and allocate further sites to meet the housing requirement in full.

