

**STAGE 2, MATTER 3:
VISION AND THE
SPATIAL STRATEGY**

**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

Carter Jonas

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 3: Vision and the Spatial Strategy.

2.0 ISSUE 4: IS THE PLANS APPROACH TO THE VISION AND SPATIAL STRATEGY JUSTIFIED, POSITIVELY PREPARED AND CONSISTENT WITH NATIONAL POLICY

Question 4.1 - Do the Strategic Policies of the Plan look ahead for a minimum period of 15 years from adoption as set out within paragraph 22 of the Framework?

- 2.1 Paragraph 22 of the NPPF requires that plans look forward for a minimum of 15 years from the point of adoption. Were the Plan to be adopted as currently drafted, it is unlikely that adoption would occur before 2026. This would result in a plan period of less than 15 years, contrary to national policy. In consequence, the Plan would require amendments to both the plan period and the housing supply estimates, as set out in the NPPF and its supporting guidance.
- 2.2 It is a matter of concern that any adjustment to the plan period would further exacerbate the shortfall in housing supply. Table S1a of the Plan identifies 456 dwellings completed between 2022–2024 as part of the supply, which would fall outside a revised plan period and no longer contribute to meeting the housing target.
- 2.3 Similarly, the housing trajectory at Annex 2 of the Housing Topic Paper (TP03) indicates that 200 dwellings identified as “Commitments as of April 2024” would also be excluded under a revised plan period.
- 2.4 Taken together, these adjustments would reduce the total available supply to no more than 4,260 dwellings, which is well below the already constrained housing requirement of 4,700 dwellings, bearing in mind the persistent under-delivery in Housing Delivery Test performance. As such, further evidence on how this anticipated shortfall will be met under the revised plan period is necessary for the Plan to be sound.

Table S1a: Sources of supply over the Local Plan period: 2022-2040 (net number of new homes)

Source of supply	Net no. of units
Housing Requirement	4,700
Housing completion to date (April 2022 to March 2024)	456
Commitments (permissions as of April 2024) with 10% lapse rate applied	600
Windfall (1-4 units)	455
Windfall (5-19 units)	407
Large urban sites (20+ units)	1,313
Small urban sites (5 to 19 units)	103
Allocations beyond current urban area to be inset from the Green Belt	1,580
Total supply over the plan period	4,914

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 - Bunzl, 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 - Finschem House, 2-4 Ashley Road	20					20														20
SA12 - Global House	75								75											75
SA13 - Small 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 (101B 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 - Ewell House, Station Road	20						20													20
SA23 - 140-142 Ruxley 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																				

Question 4.5 - Does the plan present an appropriate spatial strategy, and in what way is this supported by the evidence base? In responding to this, the Council should have regard to paragraph 8 of the Framework.

- 2.5 The simple answer is no.
- 2.6 As set out in our Regulation 19 representations and earlier Hearing Statements, it is of particular concern that the Plan provides for no more than 45.9% of identified housing need. This falls manifestly short of paragraph 8 of the NPPF, which requires plans to ensure “a sufficient number and range of homes can be provided to meet the needs of present and future generations.”
- 2.7 The Policies Map confirms that the spatial strategy is heavily concentrated in the western part of the Borough, with only a very limited number of small allocations elsewhere. Such an approach fails to deliver a balanced distribution of growth across the wider Borough, thereby undermining the objectives of the NPPF in promoting “strong, vibrant and healthy communities” and “a sustainable pattern of development”.
- 2.8 The strategy also fails to effectively achieve the Plan’s own Strategic Objective 1 to “provide a sustainable level of housing growth”.
- 2.9 Furthermore, while paragraph 5.5 of the Plan acknowledges that “housing affordability is a significant issue for Epsom and Ewell and is a key priority for the Council”, the proposed strategy neither represents a positively prepared response to that priority nor is it supported by a robust evidence base.

- 2.10 The Housing and Economic Development Needs Assessment (HB03) identifies a net need for 652 affordable homes per annum to 2040. Applying the draft Policy S6 requirement for 30% to 40% affordable housing, it would require an overall delivery of between 1,630 and 2,173 dwellings per annum to ensure a sufficient number and range of homes. Against this benchmark, the spatial strategy, which provides for 4,914 homes in total (245 dpa) would barely meet a quarter of identified need.
- 2.11 That deficit is compounded by the Council's persistent record of under-delivery, with only two affordable dwellings delivered in 2024/25.
- 2.12 It is significant that Epsom remains as the second least affordable authority in Surrey after Elmbridge, with its median housing price exceeding 15 times of the local workplace earnings. In these circumstances, our concern remains that the spatial strategy is not effective nor positively prepared.

Question 4.7 - The proposed strategy would not meet the Boroughs objectively assessed housing needs by some considerable margin. In what way does the proposed spatial strategy support the Government's objective of significantly boosting the supply of homes (paragraph 60 of the Framework) by providing a sufficient amount and variety of land to come forward?

- 2.13 Whilst this question is for the Council to answer, it is our submission that the proposed spatial strategy, in its present form, is incapable of supporting the Government's objective of "*significantly boosting the supply of homes*." As highlighted elsewhere in our submission, we have significant concerns about the level of housing requirement and the robustness of the projected supply.
- 2.14 Attention should be drawn to the fact that the revised standard method will still apply to five-year housing land supply calculations once the Plan is more than five years old. At that stage, Epsom's housing need will increase by 56%, to 889 dwellings per annum. Given the level of provision made by the current strategy, there is a very strong likelihood that, even if adopted, the Plan would be deemed out of date in Year 6 given its failure to demonstrate a sufficient 5-year supply of housing land. As such, the proposed strategy cannot therefore be regarded as deliverable, even over the medium term.
- 2.15 Apart from the quantitative aspects, it is also material to consider the geographical guidance within national policy. Paragraph 147 of the 2023 NPPF states "*Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.*"
- 2.16 This aligns with the Government's January 2025 aspiration to unlock "*untapped land near commuter transport hubs*" for housing. To underplay the merits of such locations at transport hubs will be a significant departure from what national policies would support.

Question 4.8 - In what way will the proposed strategy deliver the mix of homes needed and is the Plan positively prepared in this regard?

- 2.17 We support the broad intention of the proposed strategy to support the delivery of a mix of homes.
- 2.18 We also welcome the supporting text at paragraphs 5.1–5.2 of draft Policy S5 (Housing Mix and Type), which acknowledges the importance of mixed tenure by stating:

"5.1 Providing an appropriate mix of housing types and tenures is a vital part of creating sustainable communities and meeting the diverse needs of all people within the borough. It is important that homes can be adapted for changing needs over time and contribute to improvements ..."

5.2. Household needs within the borough are varied and include requirements for singles, couples, families, the young, older people, as well as a requirement for affordable housing."

- 2.19 It is significant that paragraph 71 of the 2024 NPPF acknowledges the benefits of mixed tenure sites in creating diverse communities and supporting timely build out rates and stipulates that *"local planning authorities should support their development through their policies and decisions (although this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported)"*.
- 2.20 Annex 2 of the NPPF further sets out the breadth of affordable housing products that are supported by national policy, including Build to Rent schemes.
- 2.21 In view of the growing challenges faced by registered providers in delivering affordable housing, coupled with the very limited affordable completions in the Borough (with only two affordable homes delivered in 2024/25), it is considered that Policy S5 should align with the Government's support for a broader range of affordable housing products and incorporate sufficient flexibility to ensure that the Borough's affordable housing needs can realistically be met.

