

**STAGE 2, MATTER 5: THE
SA AND THE APPROACH
TO SITE SELECTION**

**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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CONTENTS

1.0 INTRODUCTION	5
2.0 ISSUE 6: WHETHER THE APPROACH TO SITE SELECTION IS JUSTIFIED AND ELECTIVE	6

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 5: The SA and the Approach to Site Selection.

2.0 ISSUE 6: WHETHER THE APPROACH TO SITE SELECTION IS JUSTIFIED AND ELECTIVE

Question 6.2 - From reading the SA, I am not clear how the strategy on site selection to inform the reasonable alternatives has developed. Paragraph 4.1.5 states that the objective is to allocate a package of sites to meet needs and wider objectives. In terms of establishing growth scenarios, should the focus not be on alternative growth scenarios in the context of identified needs, rather than individual sites themselves?

- 2.1 We share the concern that the current SA does not adopt a needs-based approach that is capable of addressing the identified housing need of 10,242 homes in full. Instead, the growth scenarios tested are heavily supply-driven, focusing predominantly on choices around the allocation of individual sites. Paragraph 5.4.52 of the SA makes clear that *“each of the sub-area scenarios comprises a combination of site allocation options, and all options are treated as either a ‘constant’ or a ‘variable’.”*
- 2.2 Accordingly, none of the alternative growth scenarios test the prospect of meeting identified needs in full, nor do they explore options to maximise delivery so far as reasonably possible.
- 2.3 By adopting an approach centred on individual sites, the Plan effectively discounts any growth scenarios in their entirety where a particular site has been judged to be “unavailable”, without further consideration of whether the assessment assumptions should be revisited or whether capacity could be maximised. This is an issue which we discuss in detail at various points of MIQs.
- 2.4 We do not consider that such a supply-driven approach is compliant with national policy as it runs directly counter to the Government’s stated objective of significantly boosting the supply of homes. It is particularly inappropriate in the local context of persistent under-delivery as the Borough has never achieved more than 50% of its Housing Delivery Test target since records began.

Question 6.8 - Concerns have been raised regarding factual inaccuracies raised with the Council in October 2023 within the SA as well as inconsistencies between the SA and the site assessment methodology (see representation 163 Carter Jonas). Could the Council provide a full response to the concerns raised.

- 2.5 At the time of this submission, the Council’s response has not been made publicly available. We therefore reserve the right to provide further comments on this matter during the Hearing sessions. We would also welcome the opportunity to continue constructive engagement with the Council to explore approaches to maximise the deliverability potential of the site in order to address the Borough’s acute unmet housing need.

Question 6.10 - The 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. It goes on to advise that 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. 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. Have the Council completed this exercise?

- 2.6 Please see our Hearing Statements (Stage 1 and Stage 2 Matter 2).

- 2.7 We consider further reassessments of sites that are well served by public transport would be necessary for the Plan to be sound.
- 2.8 We would welcome further opportunities for constructive engagement with the Council to maximise the development potential of the Priest Hill site in order to assist Epsom in meeting the pressing housing needs.

Question 6.13 - Does the evidence demonstrate that there is a realistic prospect that each of the allocations will be deliverable within the Plan period? If this is not the case, is the allocation justified?

- 2.9 As highlighted in our Hearing Statement (Stage 2 Matter 2), the housing trajectory at Annex 2 of the Council's Housing Topic Paper (TP03) is optimistic and would need further evidence as required by national policies to demonstrate that each site is realistically capable of delivery within the periods claimed.
- 2.10 Of particular concern is the Plan's heavy reliance, from 2033/34 onwards, upon a single allocation which does not presently benefit from planning permission, which might render the trajectory highly vulnerable to contingencies and deliverability risks which may arise.
- 2.11 In these circumstances, additional allocations will be required in the medium and longer term would be necessary to diversify any delivery risks across the portfolio of allocated sites and to ensure that the Plan can properly be regarded as robust and deliverable.

Question 6.14 - With regards to the sites that will be delivering in years 1-5 of the Plan period, are the timescales identified justified by the evidence base?

- 2.12 The evidence base does not provide ample justification for the projected timescales relied upon to support the delivery of sites identified within years 1–5 of the Plan period
- 2.13 As highlighted in our Hearing Statement (Stage 2 Matter 2), PPG (Paragraph: 007 Reference ID: 68-007-20190722) sets out a high bar assessment for a site to be treated as “deliverable”. It requires clear, objective evidence of firm progress and commitment towards the submission of application
- 2.14 In this context, it is of note that, of the 24 sites identified by the Council as deliverable within the first five years of the Plan period, only seven presently secure planning permission or an agreement in principle. We accordingly invite the Council to produce evidence to support the projected trajectory, and we reserve the right to make further submissions at the Hearing sessions once it is forthcoming.

