

# Housing Topic Paper

## Regulation 19

**November 2024**

**Epsom and Ewell**  
**Local Plan** 2022-2040



## 1 Introduction

### Purpose of this document

- 1.1 The Housing Topic Paper is one in a series of papers that sets out how the key strategies and themes of the Proposed Submission Epsom & Ewell Local Plan have been developed.
- 1.2 Each topic paper considers relevant national and local guidance that informed the development of the Epsom & Ewell Local Plan. The topic papers set out how the strategy, policies and allocations have developed in relation to the guidance, in addition to local evidence, and consultation feedback.
- 1.3 The topic papers do not contain any policies, proposals, or site allocations. The topic papers are intended to be 'living' documents, which will be updated throughout the plan-making process in order to reflect updated evidence, changes to the policy context, and the outcomes of the various stages of consultation and engagement.
- 1.4 This topic paper looks at how policies on housing have been developed. In particular the different types of housing and how various needs will be met by the Proposed Submission Local Plan.

## 2 National Planning Policy Context

- 2.1 The National Planning Policy Framework (NPPF) includes<sup>1</sup> Section 5 on delivering a sufficient supply of homes. This sets out the importance of a sufficient supply of land to meet the various housing needs within an area. To determine the need, a housing need assessment should be carried out. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed which should include housing for older people, students and those with disabilities (in addition to other groups). The Council published a Housing and Economic Development Needs Assessment (HEDNA) in 2023 which assessed the housing needs for the Borough.
- 2.2 National Planning Policy Guidance (PPG) [“Housing Needs of Different Groups”](#) sets out that local planning authorities should assess the need for housing of different groups and reflect this in planning policies. Policies should address the needs of specific groups having regard to deliverability. PPG refers to separate guidance on housing for older and disabled people in the form of National Planning Policy Guidance [“Housing for Older and Disabled People”](#).

## 3 Housing need

- 3.1 The NPPF (December 2023) states that the overall aim should be to meet as much of an area’s identified housing need as possible, including mix and types (paragraph 60). In order to determine the minimum homes needed, strategic policies should be informed by a housing needs assessment that is informed by the standard method. Where the standard method is an advisory starting-point for establishing a housing requirement for an area (paragraph 61). The Council published a combined [Housing and Economic Needs Assessment HEDNA 2023](#), which looks at the Housing and Economic needs within the Borough. There is a separate Topic paper on economic needs, this paper focuses on housing needs.
- 3.2 The Housing and Economic Needs Assessment HEDNA 2023 uses the governments standard methodology that applied prior to updates to the PPG in December 2024 which was a four step approach. The calculation for Epsom & Ewell is set out in section 8 of the HEDNA 2023. The standard method provides authorities with an annual number based on a 10 year baseline. The results of the calculation was 10,370 dwellings over 2022-2040 or 576 per annum. Given the slight changes in the 10 year baseline the calculation with a 2024 baseline is now 10,242 over the plan period or 569 per annum.
- 3.3 In determining the housing requirement for the borough, over the period to 2040, officers have had regard to a range of [evidence](#) including the HEDNA, Land availability Assessment LAA, Green Belt Study, Site Assessment methodology and others.
- 3.4 In preparing the proposed growth strategy for the borough, officers have taken into account the need to balance the provision of new homes (including affordable housing) with environmental and policy constraints such as land designated as Sites of Special Scientific Interest, Sites of Nature Conservation Importance, Local Nature Reserves and Green Belt. The proposed strategy directs development first to the most sustainable locations, making the

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<sup>1</sup> All references to the NPPF refer to December 2023 version

best use of previously developed land in the urban area. Whilst these sustainable locations are the preferred locations for new development, it is considered that they cannot deliver adequate housing to meet our social responsibilities for providing housing, in particular affordable housing. For this reason, the proposed Spatial Strategy incorporates appropriate previously developed land within the existing built-up area currently designated as Green Belt and green field land in the most sustainable locations adjacent to the existing built-up areas that is currently designated as Green Belt. There is a separate topic paper on Green Belt Exceptional Circumstances that goes into further detail on the case for some development in the Borough's Green Belt.

- 3.5 Paragraph 69 of the NPPF (December 2023) states that planning policies should identify a sufficient supply and mix of sites, taking into account their availability suitability and likely economic viability. Planning policies should identify a supply of specific, deliverable sites for five years following adoption date and specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.
- 3.6 Historic housing delivery has averaged 197 dwellings per year between 2007-2024. The highest rate of delivery in any one year was in 2012/13 in which 517 units were delivered. Over the period, 864 units of affordable homes have been delivered, this represents just under 26% of total completed units.

**Table 8 – Affordable housing completions per year (2007/08 – 2023/24)**

Monitoring Year	Open Market Housing (net)	Affordable Units (net)	Total Dwellings (net)	Percentage affordable
<b>2023-24</b>	117	22	139	16%
<b>2022-23</b>	250	67	317	21%
<b>2021-22</b>	110	7	117	6%
<b>2020-21</b>	164	5	169	3%
<b>2019-20</b>	165	28	193	15%
<b>2018-19</b>	117	48	165	29%
<b>2017-18</b>	138	22	160	14%
<b>2016-17</b>	237	57	294	19%
<b>2015-16</b>	97	72	169	43%
<b>2014-15</b>	137	58	195	30%
<b>2013-14</b>	157	77	234	31%
<b>2012-13</b>	310	207	517	40%
<b>2011-12</b>	216	73	289	25%
<b>2010-11</b>	206	45	251	18%
<b>2009-10</b>	57	46	103	45%
<b>2008-9</b>	180	41	221	19%
<b>2007-8</b>	203	78	281	28%
<b>Total</b>	<b>2494</b>	<b>864</b>	<b>3358</b>	<b>25.7%</b>

*Table 1 Affordable housing completions per year 2007-2008 to 2023-2024 (sourced from Authority Monitoring Report 2023-24)*

- 3.7 **Policy S1** Spatial Strategy of the Proposed Submission Local Plan sets out the housing requirement for the Borough of over 4,700 dwellings over the plan period (2022-2040) and contains a detailed housing trajectory in Appendix 2.

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

Source of supply	Net no. of units
<b>Housing Requirement</b>	<b>4,700</b>
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
<b>Total supply over the plan period</b>	<b>4,914</b>

Table 2 Sources of housing supply over the local plan (sourced from Proposed Submission Local Plan)

## 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
<b>URBAN SITES (20+)</b>																				
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 - Buntz, 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
<b>SMALL URBAN SITES (5-19)</b>																				
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 - Etwell 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
<b>GREEN BELT RELEASE</b>																				
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
<b>Actual / Projection</b>		<b>317</b>	<b>139</b>	<b>217</b>	<b>255</b>	<b>490</b>	<b>417</b>	<b>347</b>	<b>267</b>	<b>377</b>	<b>392</b>	<b>242</b>	<b>222</b>	<b>222</b>	<b>222</b>	<b>222</b>	<b>222</b>	<b>222</b>	<b>122</b>	<b>4,914</b>
<b>Note:</b> 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)

## 4 Types of housing

4.1 The HEDNA's assessment of the existing housing stock shows the borough has the same

percentage of detached homes (27%) as the Housing Market Areas (HMA)- which is greater than the national average (22%) but below the average for Surrey (33%). The proportion of semi-detached homes is greater in Epsom & Ewell (36%) compared to the comparator regions of the HMA, Surrey and England. There is a lower percentage of terrace homes (14%) compared to the comparator regions of the HMA, Surrey and England at 16%, 16% and 24% respectively. Flats make up almost a quarter of total stock in Epsom & Ewell (23%). This is below the HMA average (26%) but slightly above the Surrey and England averages at 21% each.

- 4.2 The change over the previous and last census shows that detached homes continued to grow but only by 1%, within the same time the growth of terraced housing has increased by 11% and flats has increased by 19%.
- 4.3 Three-bedroom dwellings make up the majority of dwelling stock, with Epsom & Ewell having a greater proportion (39%) of 3-bedroom properties than the HMA and Surrey averages (36% each) and lower than 41% of properties in England. Epsom & Ewell also contains a significant proportion of 4+ bedroom dwellings (26%), a rate similar to the HMA average (27%) and Surrey as a whole (28%). These rates are significantly above the national average of 19%. One-bedroom properties are the least common size of dwellings across all geographies with just 9% of total dwellings in Epsom & Ewell being one bedroom.
- 4.4 The borough percentage of home ownership is higher than Surrey and national average at 77%. Social Rented housing is significantly lower than Surrey and national average at 8%. Between the previous and last census, the percentage of change is greatest in the private rented sector.
- 4.5 The HEDNA also assesses the demographic profile of the Borough which shows that one family households make up the majority of households across Epsom & Ewell (67%). The majority of one family households consist of married or same-sex civil partnership couples. The Borough has a lower proportion of one person households (26%) in comparison to the HMA and Surrey, where 5% of these one person households across all geographies are home to a person over the age of 65.
- 4.6 The average household size is an indicator of the prevalence of family households and HMOs. The average household size has been increasing for Epsom & Ewell, the HMA and Surrey as a whole between 2001 and 2020, with Epsom and Ewell experiencing the greatest increase (equivalent to 5%). In comparison, the average household size for the HMA and Surrey have increased by 4% and 3%, respectively. This is the opposite of what has been happening nationally, average household size has declined in England as a whole between 2001 and 2020, albeit by less than a percent (from 2.42 to 2.40).
- 4.7 The average household size was 2.58 in the Borough, compared to 2.53 in Surrey and 2.40 nationally.
- 4.8 Chapter 15 of the HEDNA considers the housing mix that would be appropriate to meet the needs of the borough. The proportion of different types of households with dependent children in Epsom & Ewell is 31.89% of households in the Borough. This proportion is higher than seen within any of the comparator geographies.

**Table 56: Households of different types with dependent children as a percentage of all households 2011**

Area	Married couple	Cohabiting couple	Lone parent	Other household types	Total with dependent children
Epsom and Ewell	21.22%	3.37%	5.02%	2.28%	31.89%
HMA	20.61%	3.30%	4.99%	2.29%	31.19%
Surrey	20.27%	3.38%	4.66%	2.11%	30.43%
England	15.30%	4.04%	7.13%	2.65%	29.12%

Source: Census table KS105EW

*Table 4 Sourced from HEDNA*

- 4.9 Household projections linked to the standard method estimate growth in family households over the period. This indicates there will be an increase in the number of households with dependent children by 28% (about 3,176 households) over this period. This suggests that the Borough is a relatively attractive place to bring up children. Alongside this, was an analysis of households which are over or under occupied. Data shows that 72% of people aged 65 and over living in Epsom & Ewell live in a home with 2 extra bedrooms, suggesting under occupation of large homes. At the opposite side of the scale, 9% of people under the age of 65 live in homes with too few bedrooms for their needs and are therefore suggesting these people are living in over-crowded accommodation.
- 4.10 Across the Borough, the tendency is for family households to occupy 3-bedroom housing with varying degrees of 2-and 4+-bedroom properties depending on the household composition. Data suggests it is reasonable to expect continued demand for 3+-bedroom homes.
- 4.11 The HEDNA notes the importance to deliver a range of housing sizes through appropriate planning policies taking into account relevant market signals. The opportunity to broaden and secure a mix of family-sized accommodation alongside smaller accommodation was explored in order to provide diversity in the market. The HEDNA undertook a modelling exercise (the "Housing Market Model"), combining data on tenures and sizes of properties, demographic projections, Affordable Housing need profile.
- 4.12 The outputs of the model were considered further taking into consideration matters discussed above including affordability, under/over occupancy, the number of people on the housing register, the HEDNA recommends the housing mix in the categories of Affordable Home Ownership, Market Housing and affordable housing (rented).
- 4.13 The mix of housing by size and tenure is signposted in the supporting text of **Policy S5** Housing Mix and Type. The Policy sets out the residential development should reflect the mix set out in the HEDNA (or subsequent update) having regard to the size, character and location of the site.



**Table 65: Modelled Mix of Housing by Size and Tenure in Epsom & Ewell  
(linked to occupancy patterns)**

Tenure	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms	Total
Market	7%	25%	40%	28%	100%
Private rent	21%	42%	24%	12%	100%
Social Rent	37%	31%	29%	3%	100%

Sources: Housing Market Model

*Table 5 Housing mix (sourced from the HEDNA)*

## 5 Affordable Housing

- 5.1 Paragraph 63 of the NPPF states that within the context of establishing needs, the size, type and tenure should be assessed, including groups who require affordable housing. Affordable housing is defined in the Glossary or Annex 2 of the NPPF as: using for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers). This includes a) affordable housing for rent, b) starter homes, c) Discounted market sales housing and d) other affordable routes to home ownership e.g. shared ownership. These are defined in more detail in the Glossary of the NPPF.
- 5.2 The HEDNA 2023 assessed the affordable housing need within the Borough by calculating current need and future need against supply. This provided a net annualized figure of 574 in terms of Social and affordable rent and 78 affordable home ownership over the plan period. Therefore the assessed affordable housing need is 652 per annum comprising of (574 rental properties (88%) and 78 affordable home ownership (12%). The HEDNA advises to take caution in comparing the Local Housing Need (LHN) figure and the affordable housing need figure as they have been derived from different methodologies and does not suggest that the LHN should be higher. What the data does suggest is that the tenure split of new affordable housing should reflect a majority of supply forming rented units (either social or affordable rent).
- 5.3 The HEDNA assessed the evidence for First Homes in the Borough. The NPPG on First Homes defines it as a specific kind of discounted market sale housing and should be considered to meet the definition of 'affordable housing'. First Homes must be discounted a minimum of 30% off open market value, with local authorities having the discretion to increase the discount to 40% or 50%. The HEDNA notes a problem with First Homes is that even with the discount, a property in the area may still be more expensive than some housing on the open market and it is often the case as new builds attract a premium. In addition, in order to qualify as a First Home there is a Price Cap whereby the initial sale of the home cannot be more than £250k after the discount has been applied. The HEDNA finds that a studio/1-bedroom or 2-bedroom dwellings in the Borough discounted by 30-50% would fall within the £250k price ceiling. However, for 3-bedrooms and 4-bedroom dwellings the price will not fall within the PPG price ceiling even at the maximum allowable discount (50%) since the OMV (Open Market Value) is relatively high (greater than 500k).
- 5.4 The NPPG states that a minimum of 25% of affordable housing units secured through developer contributions should be First Homes. The HEDNA assessed that a range of dwellings would be affordable to households on mid-range incomes (between £30,000 and

£50,000) given that the FH discount could enable these households to afford a 2-bedroom dwelling where without the discount only a studio of 1 bedroom home would be achievable

- 5.5 The proposed submission Local Plan **Policy S6**-Affordable Housing sets out the future requirements for the Borough. This sets out that the council will require on greenfield sites where proposals are of 10 or more new units or where the site has an area of 0.5 hectares or more, on-site provision of 40% affordable housing of the gross number of dwellings; On all other sites schemes of 10 or more new dwellings or where the site has an area of 0.5 hectares or more, on-site provision of 30% affordable housing of the gross number of dwellings will be required.
- 5.6 The policy sets out a preferred mix of 30% affordable home ownership and 70% affordable rented.
- 5.7 The requirement for 25% of affordable housing provision to be First Homes was originally contained in the Regulation 18 Draft Local Plan has been removed from the proposed submission Local Plan, as a prescriptive policy provision. This is due to the greatest need in the borough being for affordable home ownership products in the borough being for shared ownership product. These products are accessible to a broader range of the borough's residents. In addition, the updated NPPF (December 2024) has removed the requirement for a minimum of 25% all affordable housing secured through developer contributions should be first homes, however First Homes remains a type of affordable housing option.
- 5.8 **Policy S6** is supported by a viability assessment which tests various types of sites and thresholds and considers the policy to be achievable. The policy is clear that unless there are particular circumstances, there should be no need for a further viability assessment at the decision making stage.

## 6 Specialist Accommodation

- 6.1 Plan making authorities need to assess the housing needs of specific groups, including housing needs of older people. People are living longer and the proportion of older people and will continue to grow and Epsom and Ewell is no exception. Planning Practice Guidance acknowledges that the health and lifestyles of older people will differ and therefore their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support. The different types of specialist housing for older people are highlighted in paragraph 010 of the PPG (Paragraph: 010 Reference ID: 63-010-20190626):
- **Age-restricted general market housing:** This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services.
  - **Sheltered housing (retirement living):** This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24 hour on-site assistance (alarm) and a warden or house manager.

- **Housing with care (extra care):** This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.
- **Residential care homes and nursing homes:** These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

- 6.2 Surrey County Council's [Accommodation with Care and Support Strategy 2019](#) says that the care and support system in Surrey is under significant strain because of the growing number of older residents 65+ years old and the insufficient specialist accommodation, particularly a shortage of affordable residential care home beds.
- 6.3 The [Surrey Joint Strategic Needs Assessment](#) (JSNA) is an assessment of the current and future health and social care needs of the population of Surrey. It informs the [Surrey Health and Wellbeing Strategy](#) which outlines the collective health priorities for all partners across Surrey. The JSNA has been refreshed in light of the health impact of Covid-19 and to ensure it continues to reflect the current and emerging health and social needs in Surrey. There is an emphasis on making inequalities a key focus throughout the JSNA.
- 6.4 Epsom & Ewell's HEDNA looks at the need for specialist housing for older people by looking at two age cohorts between 65 to 74 years and those over 75 and above to consider the different level of needs and types of housing of these groups. The PPG accepts that it is reasonable to assume that most of the needs will be met through mainstream housing, particularly given it may be adapted or designed specifically to meet their needs.
- 6.5 The HEDNA forecasts that overall, there will be an increase of 5,823 people aged 65+ category between 2022 and 2040. This is an increase of 38% compared with an increase in the population as a whole of 22%. The proportion of the population that is over the age of 65 will increase over the period. The data also shows that older person households are more likely to own their homes outright and under-occupy properties.
- 6.6 Surrey County Council published planning guidance for accommodation with care for older people and a supporting a [Planning Profile for accommodation with care for older people for Epsom & Ewell](#) in April 2024 which provides more information regarding need and definitions. It considers the population statistic produced by POPPI (Projecting Older People Population Information) and assesses the need against supply to derive future needs for extra care housing.
- 6.7 Evidence on how this translates to need for the required number of specialist homes or bed spaces for older people varies, notably between figures provided by Surrey County Council (SCC) and the calculations provided by the independent consultants who produced the HEDNA. SCC predicts an oversupply of market extra care units and a need for 146 affordable extra care units up to 2035, and 355 nursing home beds. The HEDNA suggests that a mid

point between the SCC figures and its outputs (which arose due to a difference in prevalence rates) be used as the actual need figure, which is 308 residential units and 180 nursing care beds. Owing to the specific need for affordable extra care units, all units classified as such will be subject to affordable housing contributions to meet this need, unless there are exceptional circumstances to justify not making such a contribution, or it can be demonstrated that the cost of affordable housing has already been met through some mechanism outside of the planning system.

- 6.8 The HEDNA also looks at data on the proportion of people with a long term health problem or disability (LTHPD). The data shows that the percentage of the population with LTHPD is 13% and the percentage of households with someone with LTHPD is 26%, which is consistent with the Surrey area but lower than the national average. It is noted that the age profile will impact the numbers of people with a LTHPD, as older people tend to be more likely to have an LTHPD. In addition, a significant percentage of people with an LTHPD live in Social Rented housing, although the percentage that do so (15%) is substantially less than for England as a whole (27%). The most common tenure for people with an LTHPD in Epsom & Ewell is outright ownership of their dwelling.
- 6.9 Further assessment looks into the range of health conditions drawing from data from PANSI (Projecting Adult Needs and Service Information) and POPPI (Projecting Older People Population Information). The data shows that there a projected increase in a range of mental disabilities but a larger projected increases in the number of older people with dementia (increasing by 59% from 2022 and 2040). In addition mobility problems in all ages is likely to increase, the forecast for people age 16-64 is an increase of 17%, the most notable increase is in the 65+ age group, a 49% increase over the same period. Mobility problems range from inability to manage at least one mobility activity (e.g. going out of doors and walking down the road; getting up and down stairs; getting around the house on the level; getting to the toilet, and getting in and out of bed) and impaired mobility relates to conditions such as visual or hearing issues which will impair mobility. It is important to note that there will be overlaps between the categories so numbers should not be added together.

**Table 70: Projected Changes to Epsom & Ewell Population with a Range of Disabilities**

Disability	Age Range	2022	2040	Change	% Change
Mental Disabilities (Dementia)	65+	1,084	1,724	640	59%
Mental Disabilities (Autistic Spectrum Disorders)	18-64	477	566	90	19%
Mental Disabilities (Autistic Spectrum Disorders)	65+	137	194	58	42%
Mental Disabilities (Learning Disabilities)	15-64	1,273	1,510	237	19%
Mental Disabilities (Learning Disabilities)	65+	311	431	120	38%
Mental Disabilities (Challenging behaviour)	15-64	23	28	4	18%
Physical Disabilities (Mobility problems)	65+	2,795	4,170	1,375	49%
Physical Disabilities (Impaired mobility)	16-64	2,787	3,271	485	17%

Source: POPPI/PANSI and Demographic Projections (Dwelling-led LHN (HH-14R))

Table 6 Sourced from the HEDNA

- 6.10 To consider the specific housing options for younger people with a disability, the NHS website considers a wider range of needs and outlines 5 broad types of accommodation that may be made available; *“Teenagers and young adults with special needs or disabilities may want or need – greater independence as they get older. But they're also likely to have care needs that mean they need alternative housing options. Those care needs may be related to, for example, physical or mental health problems, a learning disability, or drug or alcohol misuse. There are a variety of housing options they may want to consider: buying or renting an adapted property; sheltered housing schemes for younger people; supported housing in the community ; supported living services ; shared lives schemes”*. The HEDNA notes that there is likely to be different products for this broad range of housing options and in addition to accommodation, it is likely that some people will need assistance with life skills such as budgeting or care plans may be required. There will not be a ‘one size fits all’. The HEDNA does not outline targets for the different housing types or where they should be located but advises that the Council work with service providers to ensure that there is a reasonable housing supply for a broad range of different groups by encouraging the development of homes that help to meet the increasing demand.

### Student accommodation

- 6.11 The borough’s higher education providers which have expansion plans are expected to generate additional need for purpose-built student accommodation to increase over the Local Plan period. The University for the Creative Arts currently have approximately 1,700 students at the Epsom Campus although there is currently capacity to increase the number of students to approximately 2,000 students, the level of growth is less than what was envisaged at the time the HEDNA was produced.
- 6.12 **Policy S7** Specialist Housing supports additional accommodation that meets the needs of specific groups. It does not set a specific quantum in the policy requirements but it does support specialist accommodation that meets an identified need within the Borough. In addition, in order to promote delivery of specialist accommodation, the policy requires larger-scale residential development to incorporate specialist accommodation unless it is demonstrated that it is not feasible to do so. The policy recognises the importance of protecting the existing provision of specialist accommodation that meets the needs of specific groups



and will only consider the loss to be acceptable where it is demonstrated that there is no longer a need for the accommodation or that an equivalent alternative provision is being reprovided elsewhere.

## 7 Accessibility

- 7.1 [Planning Practice Guidance](#) puts forward that accessible and adaptable housing enable people to live more independently, and that it is better to build accessible housing from the outset rather than having to make adaptations at a later stage. Data from the English Housing Survey (2014-15) indicates that around 25% of wheelchair user households live in housing which would either be problematic or not feasible to make fully 'visitable'. Accessible and adaptable housing will provide safe and convenient approach routes into and out of the home and outside areas, and suitable circulation space and suitable bathroom and kitchens within the home.
- 7.2 National building regulations for accessible dwellings have been clearly explained in a 2015 governmental approved document, known as [Approved Document M](#). These building regulations guide authorities and developers on the baseline of accessibility required in various standards seen below. The PPG states that where an identified need exists, plans are expected to make use of the optional technical housing standards.
- 7.3 National Accessible and Adaptable Home Standards
- M4(1): Visitable Dwellings – makes reasonable provision for most people, including wheelchair users, to approach and enter the dwelling and to access habitable rooms and sanitary facilities on the entrance storey.
  - M4(2): Accessible and Adaptable Dwellings – makes reasonable provision for most people to access the dwelling and incorporates features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair user.
  - M4(3): Wheelchair User Dwellings – makes reasonable provision, either at completion or at a point following completion, for a wheelchair user to live in the dwelling and use any associated private outdoor space, parking and communal facilities that may be provided for the use of the occupants.
    - M4(3)(2)(a): To allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs – wheelchair adaptable. For example a house should have a lift space made for a future through-floor lift.
    - M4(3)(2)(b): To meet the needs of occupants who use wheelchairs upon completion, with no adaptation needed – wheelchair accessible. A house would need not only a lift space but also a lift shaft and lift from the ground to first floor.
- 7.4 The Epsom & Ewell Housing and Economic Needs Assessment HEDNA 2023 projects that between 2022 to 2040 there will be a 42% increase in need for wheelchair user housing. The data estimates a total of 896 wheelchair user households in 2022, and that this will rise to 1,272 by 2040 (an increase of 376). Combining the current and projected need equates to 600

wheelchair user homes, justifying a need to deliver more accessible housing. This represents approximately 5.79 of the housing needs in the Borough.

- 7.5 This data and data on long term health problems LTHPD (para 2.23) above demonstrates that would be reasonable for the that the Council should require all new dwellings to be M4(2) Category 2 compliant to underpin the accessibility and adaptability of dwellings with a proviso that this is subject to build form, topography, flooding and other relevant constraints. While in some cases this may challenge viability, the typical cost of M4(2) compliance is around £521 per unit for 2, 3, and 4-bedroom homes and around £900 for 1 and 2 bedroom flats according to the then Department for Communities and Local Government paper 'Housing Standards Review' published in 2014. This does not include the extra land area needed to meet the standard. M4(2) is one level higher than the mandatory requirement M4(1) which sets out minimum access standards. In seeking M4(2) compliant homes, the Council should be mindful that such homes could be considered "homes for life" and would be suitable for any occupant, regardless of whether or not they have a long term health problem or disability at the time of initial occupation.
- 7.6 In terms of M4(3), the HEDNA assessed the future need of wheelchair user homes and recommended that the Council should seek up to 10% of all new market homes to be M4(3) compliant and up to 20% in the affordable sector. These figures reflect that not all sites would be able to deliver homes of this type. In the market sector, these homes would be M4(3)a (adaptable) and, in the affordable sector, M4(3)b (accessible).
- 7.7 The HEDNA notes that it may not be possible for some schemes to be built to these higher standards due to site specific issues such as built form, topography and flooding which may in some cases challenge the viability. Also, local authorities only have the right to request M4(3)b (accessible) compliance from homes for which they have nomination rights (i.e. affordable tenures). They can request M4(3)a (adaptable) compliance from the wider (market) housing stock.
- 7.8 The evidence from the HEDNA and Viability Assessment have informed the proposed submission Local Plan [Policy DM1](#) Residential Space Standards which requires that new homes have sufficient internal and external space to cater for a variety of different needs. The policy signposts to the National space standards in the introductory text stating that these be treated as minimum requirements and the Council will encourage higher standards where possible.
- 7.9 The policy requires that all dwellings be built to appropriate accessible and adaptable standards to meet Building Regulations Part M4(2) unless it can be demonstrated it would not be possible to do so due to site specific circumstances. The policy also requires on sites of 10 or more dwellings: i) a minimum of 10% of new market dwellings will be required to meet Building Regulations wheelchair adaptable dwellings standard (M4(3)a); unless it can be demonstrated it would not be possible to do so due to site-specific circumstances, and ii) a minimum of 20% of new affordable dwellings will be required to meet Building Regulations accessible compliance standard (M4(3)b) unless it can be demonstrated it would not be possible to do so due to site-specific circumstances or the Council's housing register identifies that there is insufficient demand.

