Affordable Housing Statement of Common Ground

On behalf of: Fairfax Properties and Epsom and Ewell Borough Council

Land at Farm View, Langley Vale Road, Epsom, K18 6AP

Appeal Ref: 6006971

LPA Ref: 25/00846/OUT

August 2026

Turley

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1. Matters of Agreement

1.1 The following Matters are agreed between the parties.

Affordable Housing Offer

1.2 The proposed development is for up to 110 dwellings, of which 50% (up to 55 homes) are to be provided on-site as affordable housing.

1.3 This level of provision exceeds the expectations of Policy CS9 of the Core Strategy (2007) which seeks 40% provision from qualifying developments.

1.4 This level of provision meets the 'Golden Rules' for Green Belt development as set out in the National Planning Policy Framework (NPPF) published in December 2024 which requires affordable housing contributions on such sites to be 15% above the highest existing affordable housing requirement, subject to a cap of 50%.

1.5 The proposed tenure split of the affordable housing units is set out in Table 1.1 below.

Table 1.1: Tenure Split of Affordable Housing Units

Tenure	No. Affordable Units	%age
Social Rent	39	71%
Shared Ownership	16	29%
Total	**55**	**100%**

1.6 The affordable housing provision will be secured through a Section 106 Planning Obligation.

Relevant Planning Policy and Guidance

1.7 The relevant Development Plan in respect of affordable housing for the appeal site currently comprises:

- Core Strategy (2007) (**CD4.1**); and
- Epsom and Ewell Development Management Policies Document (2015) (**CD4.2**).

1.8 Other relevant material considerations include:

- National Planning Policy Framework (2024) (**CD5.1**);
- Planning Practice Guidance (ongoing updates) ;
- Revised Developer Contributions Supplementary Planning Document (2014) (**CD4.4**);

- Five Year Housing Land Supply Position (**CD4.17**);
- Emerging Local Plan 2022-2040 (**CD4.2);**
- Homelessness & Rough Sleeping Strategy 2022-2027 (**CD10.1**).

Affordable Housing Needs

Adopted Development Plan

1.9 Policy CS9 of the Core Strategy (2007) (**CD4.1**) states that *"35% of new dwellings should be affordable. This equates to the provision of 950 new affordable homes over the period 2007 to 2022*" which is equivalent to 63 dwellings per annum. This is a policy target that forms part of the Development Plan, but in itself does not reflect the full extent of affordable housing need in the Borough.

1.10 The Core Strategy (2007) is underpinned by a Housing Need Assessment published in 2004 which identified an annual net affordable housing shortfall of 518 homes over an unspecified period (set out at paragraph 3.12.5 on page 32 of the Core Strategy).

1.11 This assessment is now significantly outdated. It predates the NPPF and NPPG, the introduction of Affordable Rent in 2011, and the broadened Annex 2 definition of affordable housing introduced in the 2018 NPPF (and retained in the December 2024 NPPF) which expanded the scope of affordable home ownership products.

1.12 Accordingly, the Core Strategy evidence base and the associated Policy CS9 target set out in para 1 no longer reflect national policy or current affordable housing needs and carry limited weight in the determination of the appeal proposals.

Emerging Development Plan

1.13 The Housing and Economic Development Needs Assessment published in January 2023 (2023 HEDNA) (**CD4.19**) was prepared as part of the evidence base for the emerging Local Plan. It calculates housing need over the 18 year period from 2022/23 to 2040/41.

1.14 Table 44 (page 196) identifies a net need for 574 affordable/social rented homes per annum between 2022/23 to 2040/41, equating to 10,332 homes from 2022/23 to 2040/41.

1.15 Table 45 (page 200) identifies a net need for 78 affordable homeownership homes per annum between 2022/23 to 2040/41, equating to 1,404 homes from 2022/23 to 2040/41.

1.16 As such, the 2023 HEDNA identifies a total net need for 652 affordable dwellings per annum over the period, equating to 11,736 homes from 2022/23 to 2040/41.

Indicators of Affordable Housing Need

Housing Register

1.17 Data from the Ministry of Housing, Communities and Local Government (MHCLG)[1] demonstrates that on 31 March 2025 there were 1,456 households on the Council's Housing Register. This is a 10% increase from the previous year where the figure stood at 1,324 households.

Temporary Accommodation

1.18 Data from the MHCLG[2] demonstrates that on 31 March 2025 there were 274 households placed in Temporary Accommodation (TA). This is a 9% increase from the previous year where the figure stood at 251 households.

1.19 Of the 274 households placed in TA on 31 March 2025, 65% (177 households) had at least one dependent child. There were a total of 347 children in TA on this date.

1.20 Of the 274 households placed in TA on 31 March 2025, 103 households were housed outside of the Epsom and Ewell Council area.

1.21 In the 2024/25 financial year MHCLG data[3] highlights that the Council spent £3,266,000 on TA. This is a 38% increase from the previous year where the figure stood at £2,360,000.

1.22 Of the £3,266,000 spent in 2024/25, 69% (£2,258,000) was spent on 'Bed and Breakfast Hotels (including shared annexes)' and 22% (£730,000) was spent on 'Any other type of temporary accommodation (including private landlord and not known)'.

Homelessness

1.23 As demonstrated by Table 1.2 below, data from MHCLG[4] highlights that in the 12 months between 1 April 2024 and 31 March 2025, the Council accepted 97 households in need of a homelessness prevention duty, and a further 113 households in need of a relief duty from the Council.

Table 1.2: Number of households owed a homelessness duty by reason for loss of last settled home, 1 April 2024 to 31 March 2025

Reason for loss of last settled home	Prevention duty		Relief duty	
	No. Households	%age	No. Households	%age
Family or friends no longer willing or able to accommodate	18	19%	36	32%
End of private rented tenancy - assured shorthold	61	63%	23	20%

[1] Live Table 600

[2] Additional temporary accommodation breakdowns 31 March 2025

[3] Revenue outturn housing services (RO4) 2024 to 2025

[4] Statutory homelessness in England: financial year 2024-25

Domestic abuse	0	0%	18	16%
Non-violent relationship breakdown with partner	1	1%	6	5%
End of social rented tenancy	3	3%	5	4%
Eviction from supported housing	1	1%	1	1%
End of private rented tenancy - not assured shorthold	4	4%	0	0%
Other violence or harassment	0	0%	8	7%
Left institution with no accommodation available	4	4%	5	4%
Required to leave accommodation provided by Home Office as asylum support	0	0%	1	1%
Home no longer suitable - disability / ill health	1	1%	0	0%
Other reasons / not known	4	4%	10	9%
Totals	**97**	**100%**	**113**	**100%**

Source: MHCLG Open Data.

**Figures may not sum due to rounding.*

Additions to Affordable Housing Stock

1.24 Table 1.3 illustrates gross[5] additions to affordable housing stock and net housing completions[6] in Epsom and Ewell Borough over the 18-year period since the start of the Core Strategy period in 2007/08.

Table 1.3: Gross Additions to Affordable Housing Stock, 2007/08 to 2024/25

Monitoring Period	Total Housing Completions (net)	Gross Additions	Gross additions as a %age of total completions
2007/08	318	84	26%
2008/09	258	52	20%
2009/10	140	66	47%
2010/11	288	31	11%
2011/12	261	122	47%
2012/13	489	184	38%
2013/14	203	172	85%
2014/15	172	56	33%
2015/16	131	48	37%
2016/17	279	66	24%
2017/18	132	0	0%
2018/19	137	77	56%
2019/20	157	32	20%

[5] Live Table 1008c

[6] Live Table 122

2020/21	101	18	18%
2021/22	117	11	9%
2022/23	317	67	21%
2023/24	138	22	16%
2024/25	112	0	0%
Totals	**3,750**	**1,108**	**30%**
Avg. Pa.	***208***	***62***	

Source: MHCLG Open Data.

1.25 Table 1.4 illustrates the effect of Right to Buy sales[7] on gross additions to affordable housing stock in Epsom and Ewell Borough over the 18-year period since the start of the Core Strategy period in 2007/08.

Table 1.4: Net Additions to Affordable Housing Stock, 2007/08 to 2024/25

Monitoring Period	Gross Additions	Right to Buy Sales	Net Additions
2007/08	84	Data not available	84
2008/09	52		52
2009/10	66		66
2010/11	31		31
2011/12	122	0	122
2012/13	184	2	182
2013/14	172	1	171
2014/15	56	1	55
2015/16	48	2	46
2016/17	66	3	63
2017/18	0	2	-2
2018/19	77	0	77
2019/20	32	2	30
2020/21	18	0	18
2021/22	11	0	11
2022/23	67	0	67
2023/24	22	0	22
2024/25	0	1	-1
Totals	**1,108**	**14**	**1,094**
Avg. Pa.	***62***	***1***	***61***

Source: MHCLG Open Data.

[7] Private registered provider social housing stock and rents in England (SDR)

Net Additions vs Net Needs

1.26 Table 1.5 compares net additions to affordable housing stock in Epsom and Ewell Borough with the needs identified in the 2023 HEDNA.

Table 1.5: Net Additions Compared to Needs Identified in the 2023 HEDNA, 2022/23 to 2024/25

Monitoring Period	Net Additions	Net Need	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2022/23	67	652	-585	-585	10%
2023/24	22	652	-630	-1,215	3%
2024/25	-1	652	-653	-1,868	0%
Total	**88**	**1,956**	**-1,868**		**4%**
Avg. Pa	***29***	***652***	***-623***		

Source: MHCLG Open Data; and 2023 HEDNA.

Addressing the Shortfall

1.27 To clear the 1,868 dwelling shortfall accumulated between 2022/23 and 2024/25, the Council would need to deliver 1,026[8] net affordable dwellings per annum over the next five years (2025/26 to 2029/30).

Market Conditions

Private Rental Market

1.28 The following data relies on the Office for National Statistics (ONS) Price Index of Private Rents, first published in 2015[9]. The data includes both existing and new lets, meaning the values shown may not fully reflect costs faced by new tenants:

- Average rents in England have increased by 45% from £975 per calendar month (pcm) in 2015 to £1,410 pcm in 2025.
- Average rents in the South East region have increased by 46% from £951 pcm in 2015 to £1,390 pcm in 2025.
- Average rents in Epsom and Ewell have increased by 29% from £1,278 pcm in 2015 to £1,645 pcm in 2025.

1.29 Table 1.6 below shows average rents in Epsom (where the appeal site is located) for a range of property types in July 2026, using data taken from Home.co.uk.

[8] 1,868 / 5 years = 373.6 + 652 = 1,025.6

[9] ONS discontinued the publication of lower quartile and median private rental market statistics in December 2023.

Table 1.6: Average Private Sector Rents in Epsom (New Lets), July 2026

Size of Property	Average Rent (pcm)
1-bedroom home	£1,372
2-bedroom home	£1,758
3-bedroom home	£2,544
4-bedroom home	£3,346
5-bedroom home	£3,299

Source: Home.co.uk.

Homeownership Market

1.30 The ONS publishes annual house price and earnings data for affordability ratios at the lower quartile and median levels. The median affordability ratio is a key component in the Standard Method calculation for determining Local Housing Need.

1.31 Lower quartile and median house price data is also produced for Middle layer Super Output Areas (MSOAs)[10] by the ONS. The appeal site sits within Epsom Downs and Common (MSOA Epsom and Ewell 009). Earnings data is not published below local authority level.

Lower Quartile House Prices

1.32 The data shows the following trends in lower quartile house prices since the start of the Core Strategy period in 2007:

- Lower quartile house prices in England have increased by 64% from £125,000 in 2007 to £204,995 in 2025.
- Lower quartile house prices in the South East region have increased by 75% from £162,500 in 2007 to £284,000 in 2025.
- Lower quartile house prices in Epsom and Ewell Borough have increased by 69% from £225,000 in 2007 to £380,000 in 2025.
- Lower quartile house prices in Epsom Downs and Common have increased by 81% from £275,000 in 2007 to £500,000 in 2025.

1.33 The data shows the following trends in the lower quartile workplace-based affordability ratio since the start of the Core Strategy period in 2007:

- The lower quartile affordability ratio in England has decreased by 3% from 7.21 in 2007 to 6.98 in 2025.

[10] A geographical unit in England and Wales used by the ONS for publishing small-area statistics, typically combining 4-5 Lower Layer SOAs (LSOAs) to cover 5,000-15,000 residents and 2,000-6,000 households

- The lower quartile affordability e ratio in the South East region has increased by 7% from 8.92 in 2007 to 9.56 in 2025.

- The lower quartile affordability ratio in Epsom and Ewell Borough has increased by 20% from 10.92 in 2007 to 13.05 in 2025.

Median House Prices

1.34 The data shows the following trends in median house prices since the start of the Core Strategy period in 2007:

- Median house prices in England have increased by 71% from £175,000 in 2007 to £300,000 in 2025.

- Median house prices in the South East region have increased by 78% from £215,000 in 2007 to £383,000 in 2025.

- Median house prices in Epsom and Ewell Borough have increased by 82% from £293,750 in 2007 to £535,000 in 2025.

- Median house prices in Epsom Downs and Common have increased by 107% from £291,000 in 2007 to £601,250 in 2025.

1.35 The data shows the following trends in the median workplace-based affordability ratio since the start of the Core Strategy period in 2007:

- The median affordability ratio in England has increased by 7% from 7.15 in 2007 to 7.63 in 2025.

- The median affordability ratio in the South East region has increased by 14% from 8.40 in 2007 to 9.58 in 2025.

- The median affordability ratio in Epsom and Ewell Borough has increased by 19% from 11.11 in 2007 to 13.17 in 2025.

Weight to the Provision of Affordable Housing

1.36 Affordable housing serves a dual role in the planning process. It is both a Development Plan policy requirement and a material consideration. As a material consideration, the provision of affordable housing addresses wider societal needs, including housing affordability and social inclusion.

1.37 In evaluating planning benefits (such as the provision of affordable housing) of a proposal, it is essential to recognise that compliance with policy, whether meeting or exceeding expectations, does not reduce a benefit's weight in the planning balance. Rather, the value of each benefit must be gauged on its own merits, considering the specific policy context and broader implications of the development.

1.38 Affordable housing delivery should not be viewed merely as a baseline expectation for compliance with planning policy. It is incumbent upon decision-makers to evaluate the extent to which the affordable housing provision responds to specific needs of an authority, particularly in the context of any existing deficiencies in meeting these needs and/or shortfalls in delivery when ascribing weight in the planning balance.

2. Matters in Dispute

2.1 Whether affordable housing should be treated as an individual benefit separated from the proposals contribution to housing supply.

2.2 As such, the weight to be ascribed to that benefit.

2.3 The Appellant considers the provision of affordable housing attracts substantial positive weight in the planning balance. The Council do not consider the provision of affordable housing to be an independent benefit to the provision of housing in general.

3. Declaration

3.1 This Affordable Housing Statement of Common Ground is agreed by Turley on behalf of Fairfax Aspire (the Appellant) and Epsom and Ewell Borough Council.

On behalf of the Appellant

Signature:

Name: Annie Gingell

Date: 04/08/2026

On behalf of Epsom and Ewell Borough Council

Signature:

Name: Christopher Whitehouse

Date: 04.08.26

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