

**Proposed Submission Epsom and Ewell Local Plan
(2022-2040)
Local Plan Examination**

Matter 2 – Housing Need and Supply

Hearing Statement prepared on behalf of
Taylor Wimpey Strategic Land

September 2025

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Client

Taylor Wimpey Strategic Land

Our reference

02496_PLESE

September 2025

1. Introduction

- 1.1 This Matter Statement has been prepared on behalf of Taylor Wimpey Strategic Land and in respect of Matter 2 of the Proposed Submission Epsom and Ewell Local Plan (2022-2040) Local Plan Examination (herein after referred to as the '*Reg 19 Local Plan*'). Matter 2 is dealing with Housing Need and Supply.
- 1.2 Taylor Wimpey Strategic Land has submitted formal representations to the Reg 19 Local Plan.
- 1.3 The Statement has been prepared in response to the specific issue (Issue 2.1) raised by the Inspectors in the '*Matters, Issues and Questions*' published on 9th July 2025, namely that '*Whether the housing need and supply for the borough and contained within the Plan are positively prepared, justified, and consistent with national policy?*'
- 1.4 This Matter Statement responds to the Inspectors' questions and has been considered in the context of the tests of 'Soundness' as set out at Para 35 of the National Planning Policy Framework (December 2023).
- 1.5 The NPPF December 2024 has recently been published. The transitional arrangements set out in paragraph 234 confirm circumstances where an emerging Local Plan will be determined against the December 2023 NPPF. This includes where the Plan has been submitted for examination under Regulation 22 on or before 12 March 2025. This does apply in the case of the Reg 19 Local Plan. The references to the NPPF therefore relate to the December 2023 version.
- 1.6 These require that a Plan is:
 - Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

2. Matter 2: Housing Need and Supply

Issue 3: Whether the housing need and supply for the borough and contained within the Plan are positively prepared, justified, and consistent with national policy.

Q3.1 Policy S1 identifies that the housing requirement for the period 2022-2040 is 4700 homes. This is a shortfall of 5500 homes when considered against the standard method. The Plan makes provision for 4914 homes over the plan period. The Council are not suggesting that an alternative method for the calculation of housing need should be adopted here – is this correct?

- 2.1 The 'Council's Response to the Inspectors' initial questions' (Document reference COUD_005) dated 19th August 2025 argues there are '*robust reasons for specifying a requirement that results in a shortfall of about 5,500 dwellings*'. These reasons are set out at paragraph 1.38 of the Response.
- 2.2 However, there is no evidence or rationale to justify an alternative requirement that is lower than the Standard Method requirement. This is only applicable in exceptional circumstances as required by paragraph 61 of the National Planning Policy Framework - the Standard Method is the advisory starting point and the related requirement should be viewed as a minimum. Indeed, the Sustainability Appraisal (SA) (Submission Doc SD05a) at paragraph 5.28 states that '*in 2023 there was not considered to be exceptional circumstances to justify use of an alternative method, and that remains the case at the current time.*'
- 2.3 However, rather confusingly the SA approach considers the constraints of the Borough and potential site options in determining the appropriate level of housing growth scenarios to test. All 7 growth scenarios tested are significantly less than the Standard Method requirement of 569 dwellings per annum (dpa). This approach does not reflect the anticipated staged approach to testing reasonable alternatives through the Sustainability Appraisal in the first instance (our underlining). This should at least include testing a scenario that was based on the Standard Method.
- 2.4 National Planning Practice Guidance (NPPG) confirms that the SA '*needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area*' (Paragraph: 018 Reference ID: 11-018-20140306). This should be the first stage, i.e. to test all 'reasonable' alternatives.
- 2.5 There is no reason why one scenario tested shouldn't include meeting Standard Method requirements. This is implicit in Para 61 of the NPPF which confirms this is an advisory starting point for establishing a housing requirement. It is also a scenario that is most likely to score well against social and economic sustainability objectives. Only in testing this scenario can it be concluded that it is not reasonable, taking into account environmental, social and economic sustainability objectives.

- 2.6 In the absence of this exercise, the evidence base cannot be said to be positively prepared, justified or consistent with national policy. Instead the Council has dismissed testing this scenario at the outset, on grounds related to environmental constraints, pre-determining this important exercise. This is exacerbated by the fact that the maximum housing provision tested would still result in an unmet need of 4,000 dwellings relative to the Standard Method requirement.

Q3.2 Is the Plan justified in not meeting the full LHN?

- 2.7 It is recognised that the Council have made some concerted effort to meet the Standard Method requirement through seeking to maximise appropriate brownfield opportunities and through the release of some Green Belt for residential allocations. It is also noted that the Council indicate in Document reference COUD_005 that even considering all of the sites promoted within the Land Availability Assessment (LAA) (Document reference HB_01A) this would only provide up to 8,301 homes (which equates to 80% of the full LHN), though it is difficult to confirm how this figure has been established.
- 2.8 However, in order to demonstrate the Plan has been positively prepared and is justified in accordance with the soundness tests, more could have been done to deliver a greater level of housing. The Spatial Strategy Topic Paper (TP07) recognises that the limited availability of previously developed land requires the consideration of *'alternative options of increasing density where appropriate and/or developing or extending outwards outside of the urban envelope into the Green Belt.'* It is considered that both these options could have delivered more significant housing through additional allocations and enhanced density where appropriate.
- 2.9 Paragraph 146 of the NPPF requires that Local Planning Authorities, before considering Green Belt release, should *'a) make as much use as possible of suitable brownfield sites and underutilised land; and b) optimises the density of development in line'*. To confirm, my client does consider that Green Belt release is necessary, but that the approach to optimising density could go much further.
- 2.10 Such an approach would be consistent with the paragraph 90 of the NPPF, which states that *'Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation'*, and as part of this, *'recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.'*
- 2.11 It would also be consistent with the Spatial Strategy of which a significant element is to support high quality and high density development within Epsom Town Centre, for example, in order to support its' regeneration and future vitality and viability.
- 2.12 By way of example, Policy SA05 allocates the site at Epsom Town Hall for the development of 90 dwellings. My client supports the principle of the allocation of the site, but considers there is scope for a greater level of density taking into account the need to more positively plan to meet housing requirements.
- 2.13 My client recognises that in respect of the Local Plan strategy for the town centre and related densities, much is based on the recently adopted Epsom Town Centre Masterplan (ETCM) (Document HB06a and b). The ETCM identifies the suitability of the Town Hall site for redevelopment. My client again agrees the site is suitable and offers significant potential to deliver apartment blocks on a brownfield site in a highly sustainable location.

- 2.14 However, the references to building heights ranging between 4-5 storeys underestimates the potential height of development that can be achieved. Whilst it is important to respond to the existing urban context, including heritage assets, this includes existing 3-4 storey apartments to the immediate north and east. Other sites identified within the ETCM and Reg 19 Local Plan propose building heights of up to 8 storeys, e.g. Global House/Policy SA 12.
- 2.15 It is considered that a more appropriate balance between responding to existing context and maximising the potential development of the site to deliver much needed housing would refer to 5-6 storeys and a reduced level of parking provision commensurate with the sustainable location of the site. A corresponding increase in capacity to 120-130 would be appropriate. The site may well be suitable for a high proportion of affordable units, subject to viability and/or a comprehensive approach linked with other proposed greenfield allocations.
- 2.16 Equally, the Green Belt study identifies several Green Belt sites that make varying contributions to purposes 1-3 of the Green Belt. The study has led to the identification of several allocations for residential led development and related release from the Green Belt. This is welcomed.
- 2.17 However, given the significance of meeting the LHN and the related need for the plan to be positively prepared, a more balanced approach could have been undertaken. This would include a more detailed consideration for uplifting the residential capacity of some sites, and/or a greater number of sites identified for residential led allocation/released from the Green Belt.
- 2.18 By way of example, this could include the allocation of the Hook Road Arena site within Policy HA34. The Green Belt study assesses the site as part of Field Parcel 31. This concludes that *'the Landscape and visual sensitivity is low. The parcel well defined robust and durable boundaries on its north eastern and western boundaries formed by Chessington Road and Hook Road respectively which are also considered capable of forming a new robust Green Belt boundary.'* My client supports this conclusion and the principle of the allocation of the site.
- 2.19 Policy HA34 states that the development *'will provide a New Sports Hub for the borough to include playing pitches (grass and artificial), a new pavilion and changing facilities. The provision of approximately 100 dwellings (C3) on the eastern part of the site.'* However, it is not clear where the extent of the eastern part of the site has been defined and the restriction to this area is not consistent with the Green Belt study which refers to Chessington Road and Hook Road as capable of forming a new Green Belt boundary.
- 2.20 It is recommended that more detailed evidence is required that includes a land use plan to better understand the space requirements for the Sports Hub, playing pitches, pavilion and changing facilities. On face value, a more significant level of housing could be provided.
- 2.21 The Green Belt study confirms that *'any proposed amendment will be based on overall consideration of the spatial strategy, taking into account sustainability, suitability, deliverability of sites, environmental considerations, other constraints and planning considerations.'*

Q3.3 Does the approach demonstrate that the Plan has been positively prepared in accordance with paragraph 35 of the Framework and will it be effective?

- 2.22 No, for reasons given above it is not considered that the Plan, and specifically the extent of housing requirements proposed against the LHN, can be considered to be positively prepared as required by paragraph 35 of the NPPF.

Q3.4 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, 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?

- 2.23 The above is set out at para 025 (ID: 3-025-20190722). It is acknowledged that the Council have undertaken call for sites exercises in 2017, 2022 and 2023 and sought to identify sites through other sources, including recently refused planning applications, non-confidential pre-applications, and Regulation 18 representations identifying possible sites (LAA Document HB01a). However, in the circumstances of a significant shortfall against LHN an additional and more recent call for sites would have been appropriate, given the 2023 call for sites concluded on 31st July.

- 2.24 More significantly, as referred to above, there is little evidence of reconsidering the development potential of existing and/or proposed allocations. Too much reliance is placed on the ETCM in determining capacity of relevant sites included as allocations, without recourse to reassessing this in the context of the emerging Local Plan and the need to plan positively to meet LHN. Equally, there is little evidence that this similar context has had any influence in determining capacity of allocated sites within the Green Belt.

Q3.5 Where is the evidence base to support this? As far as I can see, the evidence base in this regard consists of the LAA 2024 (HB01a). The conclusion from this assessment suggests there is insufficient land within the urban area to meet the identified need against the standard methodology of 573 dpa (around 34%). Is this the totality of the evidence in relation to this point?

- 2.25 See answers to 3.2 and 3.4 above. More evidence is required to demonstrate that the Reg 19 Plan has considered all options in meeting the LHN.

Q3.6 The LAA 2024 (HB01a) states that it is 'unlikely that increasing the density of potential sites is likely to yield a sufficient amount to address the shortfall, nor would revisiting discounted sites'. What evidence has the Council to support these statements?

- 2.26 See answers to 3.2 and 3.4 above.

Q3.7 Has the Council identified land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, as required by paragraph 70 (a) of the Framework?

2.27 My client has no comments on this question.

Q3.8 Could the Council identify which sites make up this requirement and where in the evidence base is the support for the approach put forward?

2.28 My client has no comments on this question.

Q3.9 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?

2.29 In order to demonstrate a five year supply, a variety of sites should be identified, and the Council should take a proactive and flexible approach to delivery of allocated sites. This will be particularly the case with town centre sites which can often have more complicated land ownership and viability considerations.

Q3.10 Is the trajectory contained within the Plan up to date? The Council should provide any updates which should include identified completions, existing commitments and any other sources of supply the Council are seeking to rely upon.

2.30 My client would only note that the completions in 23/24 of only 139 units emphasises the important opportunity of this Plan to make a step change in delivery and plan positively for the delivery of housing to meet LHN.

2.31 More specifically, with a more proactive and flexible approach from the Council it is considered that the projected delivery from some of the allocated sites may be regarded as pessimistic.

Q3.11 In terms of windfall, paragraph 72 of the Framework advises that where an allowance is made for windfall sites as part of an anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. The housing trajectory includes a windfall allowance of 455 (small windfall) and 407 (large windfall) over the plan period, is this a justified approach to provide separate figures for large and small sites?

2.32 My client has no comments on this question.

Q3.12 Document TP04 explains the approach to large windfall sites. Is this a justified approach given (a) the allocation of sites within the urban area as assessed by the LAA and (b) given the fact that the allocation of town centre sites is the primary source of housing supply over the plan period?

2.33 My client has no comments on this question.

Q3.13 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?

2.34 My client would simply observe that the trajectory indicates 862 dwellings are anticipated from small and medium windfall sources toward a total housing provision of 4,914 dwellings, representing 17.5% of total supply.

Q3.14 Section 3.3 of document TP04 considers the sites which have contributed to the largest windfall sites. Please could the Council explain the rationale for the conclusions drawn in relation to the sites considered at paragraphs 3.3.2,3.3.3, 3.3.5?

2.35 My client has no comments on this question.

Q3.15 If the windfall rate to be applied to this Plan only focuses on small and medium sites, (units 1-9) what would this mean for the windfall delivery rates to be applied to the housing supply?

2.36 My client has no comments on this question.

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