

Justin Turvey
Place Development



Town Hall
The Parade
Epsom
Surrey
KT18 5BY

Main Number (01372) 732000
Text 07950 080202
www.epsom-ewell.gov.uk
DX 30713 Epsom

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Contact Susie Legg
Direct line 01372 732393

Email localplan@epsom-ewell.gov.uk

Dear East Hampshire District Council

Duty to Cooperate: Housing Land Supply

Epsom and Ewell Borough Council is progressing with its Local Plan and is now moving towards the Regulation 19 stage in the plan making process. To support this, we have been carrying out further work on our evidence base to ensure it is robust and up to date, to help guide and inform the content of the Regulation 19 version of the Local Plan. Part of this work has involved reviewing and updating the Land Availability Assessment (LAA), which is now mostly complete.

We previously contacted you in November 2022 when the first iteration of the [LAA](#) was almost complete, to ask for assistance in meeting some of our housing needs. The government's standard method has identified our housing need be 573 new dwellings per annum, which is 10,314 dwellings across the plan period 2022 to 2040. This represents a significant increase in housing delivery given that our previous Core Strategy housing target was for 181 new dwellings per annum.

The borough of Epsom & Ewell comprises either urban areas or Green Belt land and the LAA had shown the availability of sites to be extremely limited, with the urban areas being only able to accommodate 37% of the housing need generated by the standard method. In accordance with the planning practice guidance, where insufficient sites / broad locations to meet need are identified, we have revisited and updated the LAA. This has involved:

- Another Call for Sites exercise.
- Contacting all landowners again to confirm availability of sites.
- Reviewing 2022 LAA sites against any updated evidence (for example any changes to the Environment Agency's flood zones).
- Reviewing estimated capacities of individual sites (seeking to optimise yields).

- Reviewing current planning applications/refusals/pre-applications.
- Updating the windfall allowance based on past trends – to include an allowance for small (1-4) and medium (5-19) windfalls.
- Updating the trajectory.

The LAA update has shown that potential supply in the urban area of the Borough has reduced slightly, with the identified urban sites being capable of accommodating 33% of the calculated need generated by the standard method. This reduction is primarily due to sites not being confirmed as available by the landowners.

It should be noted that Green Belt sites, which have been promoted through the various Call for Sites exercises, have been included in the LAA to ensure comprehensiveness and completeness. However, they have not been included in the housing supply calculations as this requires the demonstration of exceptional circumstances. To demonstrate the severity of the borough's housing supply position, the table below shows what the situation would be if all the Green Belt sites submitted to the Council were to be included, regardless of their suitability or the need to demonstrate exceptional circumstances. It is clear there would still be a significant shortfall in the housing land supply against the need generated by the standard method.

Type of Site	% of housing need as per the standard method	Unmet need against the standard method
Urban sites (assessed as being deliverable and developable)	33%	6,910 (67%)
Green Belt sites (all sites promoted through the Call for Sites exercise)	45%	-
Total	78%	2,269 (22%)

As such, in accordance with current national policy and the duty to cooperate, we are once again writing to our neighbouring authorities, wider Surrey authorities, those within the same housing market area and those who may not be constrained by Green Belt designations to seek assistance in meeting our unmet need. We are keen to understand whether anything has changed with your own housing land supply position since we last wrote to you in November 2022, which would enable you to assist us?

In addition to housing need, we are also in a challenging position in relation to meeting our Gypsy and Traveller accommodation needs. Since the government's change in definition of a Gypsy or Traveller, our need has risen from 10 additional pitches to 18 additional pitches¹. We are exploring opportunities as to how these needs could be met but are anticipating there being a shortfall. Again, we wrote to you previously regarding this issue and are keen to understand if your own situation has changed and you are able to offer any assistance in helping to meet this need?

¹ Needs are identified in our [Gypsy and Traveller Accommodation Assessment 2022](#).

If you wish to discuss the content of this request and/or require further details, please let me know and we can arrange a meeting or phone call.

We would be grateful for a response by **Friday 9 August 2024** so that we can consider our Spatial Strategy options in light of the responses we receive.

Yours Sincerely



Justin Turvey
Head of Place Development