

Dear Sir/ Madam

EPSOM AND EWELL LOCAL PLAN – FOCUSSED CONSULTATION

1. Below are the Home Builders Federation's (HBF) comments on the additional evidence prepared following the conclusion of last year's stage 2 hearings. HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which include multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
2. In our representations and at the hearings on the local plan HBF raised concerns that the approach to considering exceptional circumstances on a site by site basis was flawed and that further consideration of these matters was required. While HBF cannot comment on the site specific assessments we have no concerns regarding the approach that has been taken by the Council in reconsidering exceptional circumstances and welcomes the outcomes of the work which identified an additional five sites with the potential to be removed from the Green Belt to boost housing supply in Epsom and Ewell. HBF consider it necessary for soundness that the local plan is modified to include these sites.
3. However, even with these sites there remains a shortfall of circa 4,000 homes over the plan period. HBF recognise that it is unlikely that housing needs will be met in full, but the scale of the shortfall means that it remains essential that the assessments of each site are thoroughly scrutinised, and should it be evident that additional sites to those identified in Table 7 of COUD-029 are suitable for allocation then these are also included within adopted plan.
4. The Council have updated the housing trajectory to include the potential allocations. This is set out in Figure 2. The five year land supply assessment is then set out in Table 8 which states that the Council will have a 6.02 year land supply should the potential sites be allocated and the housing requirement of 261 dpa be retained. HBF has a number of concerns with Table 8. Firstly, HBF do not agree that the 261 dpa should be retained as the housing requirement. Given that the housing requirement is capacity constrained then logic would suggest that the housing requirement is more closely related to supply – circa 340 dpa.
5. Secondly, the assessment of five year land supply is for the period 1 April 2025 to 31 March 2030. In considering the soundness of the plan it is necessary to consider whether there will be a five year land supply on adoption. It

is assumed that this will take place later this year and as such the period over which the five year land supply should be calculated is 1 April 2026 to 30 March 2031.

1. Thirdly, the 20% buffer is applied to the housing requirement including any past under supply - as stated in paragraph 68-022 of Planning Practice Guidance. Using a housing requirement that reflects supply (340 dpa) and an approach that is consistent with PPG the Council would have a land supply on adoption of 4.47 years which would then increase to 5.02 in 2027/28.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

Mark Behrendt

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