





# **Epsom and Ewell housing targets in the crosshairs**

The borough of Epsom and Ewell is currently engaged in a critical juncture of its planning future. The Council's Regulation 19 draft Local Plan is under examination by the Planning Inspector, and at the same time the Government's own statisticians, the Office for National Statistics (ONS), have published their new household projections. The juxtaposition of these two sets of figures highlights a growing tension between demographic trends, the Government's national housing policy tool (the "standard method"), and local deliverability constraints.

### Household growth projected by ONS

According to the ONS's "2022-based" household projections for local authority areas, the number of households in Epsom & Ewell is forecast to rise from approximately **31,299** in 2022 to **35,493** in 2042 — an increase of about **4,194 households** over 20 years, which corresponds to roughly **209 additional households per year**.

It is important to emphasise that these are demographic projections (households forming under assumed migration, fertility, mortality etc). They do *not* translate directly into the number of homes that must be built: they make no allowance for planning constraints, land supply, local infrastructure, or policy decisions.

#### What the draft Local Plan proposes

The draft Local Plan for EEBC, covering the period 2022-2040, sets out the following key housing supply/requirement numbers:

- A minimum housing requirement of 4,700 dwellings over the Plan period, which equates to approximately 261 dwellings per year.
- An identified supply to deliver around **4,900-4,914 dwellings**, providing a modest buffer above the minimum requirement.

These numbers reflect the Council's assessment of what is realistically deliverable given local constraints (Green Belt, flood risk, infrastructure, viability etc).

## The "standard method" for housing need

Under national planning policy (the National Planning Policy Framework or NPPF) the "standard method" is the Government's default tool for calculating housing need in local authorities. This is not a requirement automatically to be delivered by local authorities, but sets a starting point that local plans should address. In the case of EEBC:

- In the Plan examination evidence the Council cites a standard method calculation of **10,242 dwellings** over the plan period, which equates to about **569 dwellings per year** a figure more than double the Plan's proposed annual rate.
- Separately, analysts have calculated that under the more recent stock-based standard method (introduced in late 2024) which uplifts areas with higher affordability pressures, EEBC's implied requirement would be around 871 dwellings per year, i.e. nearly 900 homes a year.

#### Why the "affordability uplift" matters

A key message that has emerged from CPRE Surrey and elected members is that the new standard method gives very heavy weight to the "affordability uplift" — the ratio of house prices to local earnings — and that this seriously disadvantages boroughs such as Epsom & Ewell.

As Tim Murphy (CPRE Surrey) put it: "The latest numbers from the Government's own statisticians show that the housing target

set by the Government for Epsom and Ewell is totally unrealistic. The target would mean that, over the next twenty years, the Borough would lose much of its existing open space – the character of the area would be changed for the worse for ever."

Specifically:

- The standard method compares local house prices with *local* earnings. In Epsom & Ewell many resident households earn London or Canary Wharf salaries (commuting to central London) which inflate local house prices but are not captured in the earnings base used for the formula.
- There is no adjustment (in the national method) for such commuting-induced distortion of house prices. The result: the formula treats Epsom & Ewell as a high affordability-pressure area and drives a very large uplift in the 'need' figure.

In short: the standard method may be overstating "need" in places where price inflation is driven by non-local earnings rather than purely local demand or local pay.

#### Contrasting the figures: ONS vs Local Plan vs Standard Method

Here are the headline comparisons:

- **ONS household formation projection**: ~209 new households per year (2022-2042)
- **EEBC draft Local Plan requirement**: ~261 homes per year (2022-2040)
- Standard method (2023 NPPF basis): ~569 homes per year (10,242 over the period)
- **Updated stock-based standard method (2024 NPPF basis)**: ~871 homes per year (analyst estimate)

#### What this shows:

- The Local Plan's 261 homes per year is *above* the demographic projection of ~209 households per year, thus it can be argued that the Plan is planning for growth above simple demographic trend.
- However, it remains *far below* the standard method starting points (569 or 871 per annum) representing a significant gap between what the national policy tool implies and the local Plan provides.
- The gap calls into question how far the Borough should be expected to "deliver" the full standard-method figure given local constraints, and whether a higher rate is justified (or deliverable) in practice.

#### Additional context from councillors

Councillor **Kate Chinn** (Labour Court) notes that: "Epsom and Ewell has a huge housing crisis now and can't provide suitable homes for its current residents so the borough needs to build more than just enough to keep up with household growth. There are people in serious need of rehousing who are waiting years ... the Residents Association ... needs to stop looking for reasons to block new housing and start working with developers to build decent homes for residents."

This underlines that local housing need is not only about future households but existing unmet need: social housing shortages, long waiting lists, temporary accommodation of poor quality, and the knock-on effects on children's life chances, health, education and emotional well-being.

Councillor **James Lawrence** (LibDem College) adds further policy context, reminding us that the draft Local Plan is being prepared under the December 2023 NPPF (which uses the earlier standard method approach). He points out that the updated 2024 NPPF uses the stock-based standard method, raising further questions of whether the Plan needs to be reassessed in light of the new method. He also highlights the circularity argument: using future population projections to determine how many homes to build, when building more homes will itself change future population.

Councillor **Peter O'Donovan** (RA Ewell Court), Chair of Epsom and Ewell Borough Council's Licensing Policy and PLanning Committee responded: "The Councils Local Plan was submitted to government in March 2025 and is now being examined by a government appointed Planning Inspector, this is known as the examination stage. The revised ONS household projections data do not impact the examination of the Local Plan. Keep up to date with the Local Plan Examination here: Local Plan Examination | Epsom and Ewell Borough Council"

#### **Implications for Epsom & Ewell**

The mismatch between demographic projections on the one hand and national policy-based housing "need" on the other has several implications:

- **Deliverability and infrastructure**: The higher standard method numbers assume a very much higher rate of building than the Borough has historically achieved. If such rates were imposed, the supply of suitable land, infrastructure capacity (transport, schools, services), viability of development and environmental constraints (Green Belt, flood zones) would all come under significant pressure.
- Green space and character: As Tim Murphy rightly flags, if nearly nine hundred homes per year were required over twenty years, the borough's character, open spaces, suburban nature and amenity would face significant change. For many local residents preservation of character is a live concern.
- Affordability link and commuting distortion: The standard method's reliance on local earnings means that boroughs like Epsom & Ewell (with many commuters earning London wages) may be unfairly treated. The commuting effect inflates prices but is not compensated by the earnings measure. The formula may therefore over-inflate "need" in such areas.
- Focus on genuine need: The local context shows that, beyond future household growth, there is an existing backlog of need (e.g., social housing, temporary accommodation, unsuitable homes). If the borough simply aimed to match new household formation it might still fail to meet the existing need. Councillors emphasise that making provision for those already housed in inadequate conditions must be part of the strategy.
- **Policy and timing**: The draft Local Plan uses the earlier standard method (2023 NPPF) calculations; the switched methodology in the 2024 NPPF potentially changes the baseline "need" significantly. This raises questions as to whether the Plan remains future-proof and whether the examination will ask for an updated technical basis.

For the readership of the Epsom & Ewell Times and stakeholders across the local community, the following points merit emphasis:

- Clarify that the ONS figure (~209 homes per year) shows what is *likely* in demographic terms, but that housing targets set by policy may differ significantly.
- Highlight the role of the affordability uplift and how the standard method treats areas like Epsom & Ewell (with commuting wage influences) differently from truly local-wage areas.
- Encourage the Council and stakeholders to scrutinise whether the standard method's assumptions are appropriate in the local context and whether the draft Plan provides sufficient evidence to justify deviation from higher figures.
- Promote transparency on how the Plan addresses existing housing deprivation, not just future household formation: how many social or affordable homes, how many temporary accommodation units, how many conversions of unsuitable homes, etc.
- Ask whether the local infrastructure, land supply and environmental constraints realistically allow delivery of very high build rates, and whether the Plan sufficiently tests viability at the higher levels implied by the standard method.
- Encourage local residents to comment on the Plan and its housing provision strategy, especially in light of the gap between national "need" figures and local deliverability.
- Recommend that the Council monitors any changes in Government policy or standard method revisions (e.g., if further changes to the affordability uplift or commuting adjustments are introduced) and updates the Plan accordingly.

Epsom & Ewell's draft Local Plan appears modest but credible when viewed against demographic household growth alone. However, it falls far short of the housing "need" implied by the Government's standard method calculations. The prominence of the affordability uplift in that method raises particular concerns for commuter-belt boroughs such as this, where local earnings do not fully capture the incomes of many resident households. The key challenge for the borough is to strike a balance between realistic deliverability, protection of local character and amenity, and the clear social housing need that exists today. The

examination process offers an opportunity to test whether the Plan is positively prepared, justified and effective — but it will also require robust scrutiny of whether national formulae appropriately reflect local circumstances.

Sam Jones - Reporter



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