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Letter sent electronically only to: bankssolutionsuk@gmail.com

Dear Ms Masters

Re: Elmbridge Borough Council examination in public. Response to Stage 2 Matters, Issues and Questions

Thank you for providing the Council with the opportunity to respond to the questions you have raised as part of the stage 2 hearings of the Elmbridge Local Plan examination.

The Council wishes to comment primarily on the contents of the January 2022 Exceptional Circumstances Case -Green Belt paper (document reference OTH043) which was not publicly available when the Council responded to the Draft Elmbridge Local Plan 2037 consultation in July 2022. The Council has also included in this response some additional information for comparison purposes with other Local Plan examinations where it has been found that that exceptional circumstances have existed and which has supported the release of Green Belt land to meet housing needs. All comments made in Runnymede Borough Council's original letter of 29th July 2022 still stand, and we would ask that you give these comments due consideration in your deliberations.

The questions that the Council wishes to respond to are set out below along with our additional comments.

Matter 2 The approach to housing need

Issue 4: Is the approach to calculating the level of housing need over the Plan period justified, effective and consistent with national policy?

Question 1.3 A number of the Statements of Common Ground (SoCG) with neighbouring authorities have raised concerns regarding the intensity of housing need within Elmbridge and its wider housing market area, and the implications of the spatial strategy adopted which may exacerbate unmet need across the areas and place additional pressures on other areas. Is this a legitimate concern and are these concerns supported by evidence?

Runnymede Borough Council believes that the information presented by officers at Elmbridge Borough Council in document OTH043 (particularly paragraphs 6.16 to 6.23) demonstrates that there is not only an intense housing need in Elmbridge, but that the situation is deteriorating particularly in relation to housing affordability. The evidence presented in OTH043 is considered to be compelling. On this basis, the concerns raised previously by Runnymede Borough Council regarding how Elmbridge Borough Council has factored the intensity of its own housing needs alongside those of its wider housing market area into the development of its Spatial Strategy are considered to be legitimate. Given the intensity of the unmet needs, Runnymede Borough

Council remains concerned that by failing to prepare a spatial strategy which will see Elmbridge Borough Council meet its identified housing needs in full, this will inevitably put additional pressure on surrounding areas, particularly given that Elmbridge has not identified any partners who can meet its unmet needs.

Matter 3: The vision, spatial strategy, and the distribution of growth over the Plan period

Issue 5: Whether the vision and proposed spatial strategy is justified, effective, positively prepared, and consistent with national policy including the proposed distribution of development across the Borough.

Question 2.21 In what way will the spatial strategy address the Council's priority of addressing the acute affordable housing need within the Borough?

You have noted in Matter 6, question 5.1 that HOU005 sets out that there is a backlog need for affordable housing of 1434 units. The Plan proposes to address this backlog need over a period of 20 years, i.e. not within the Plan period, which calls into question the effectiveness of the spatial strategy. Your question 5.2 then asks what the affordable housing need would be if the backlog were to be addressed over the Plan Period?

Runnymede Borough Council would simply note the contents of paragraph 6.24 of OTH043 which states:

In the working draft Local Plan presented to the LPWG in June 2021, under Option 5a, officers identified 12 areas of Green Belt for release and allocation for housing development within the plan-period with a further 2 areas of Green Belt to be released from the Green Belt and safeguarded for future development. Applying the emerging policies relating to affordable housing provision, it is anticipated that these 12 areas could provide approximately 950 affordable homes. This number of affordable homes is approximately half (47%) of our anticipated affordable housing delivery across the plan-period across all sites (providing 10 or more units). In effect, whilst the shortfall of housing delivery in the urban areas is 25% when measured against our Local Housing Need figure, the loss to affordable housing is circ. 50% of overall potential delivery.

This demonstrates the significant difference that amending the spatial strategy to one with a modest element of Green Belt release could have in terms of addressing the acute affordable housing needs in Elmbridge.

Matter 4: The Housing Requirement

Issue 7: Whether the Local Plan has been positively prepared and whether the approach is justified, effective and consistent with national policy in relation to the housing requirement

Question 3.2 Does the approach demonstrate that the Plan has been positively prepared in accordance with paragraph 35 of the Framework and will it be effective?

Runnymede Borough Council remains of the view that the spatial strategy contained in the Local Plan will not be effective as it fails to properly address the intense housing needs in the Borough and wider Housing Market Area as evidenced through the Council's Duty to Cooperate work. The evidence presented in OTH043 is that the housing need in Elmbridge and its surrounding HMA is intense, with house prices only becoming less affordable. Therefore, contrary to paragraph 35c of the NPPF, it is considered that the Council's chosen spatial strategy is deferring the issue of meeting housing needs rather than dealing with it.

The Council is also of the view that the spatial strategy has not been positively prepared, contrary to paragraph 35a of the NPPF as it fails to meet the Council's objectively assessed housing needs, even though there is a clear alternative spatial strategy which could come much closer to achieving this outcome (option 5a) and which the Council's SA has scored strongly. The benefits of option 5a are summarised in paragraphs 4.30, 6.24 and 6.79 of OTH043. Paragraph 4.31 of OTH043 further confirms that option 5a is one of the reasonable alternative options identified by officers as 'most appropriate' to inform the spatial strategy for the emerging draft Local Plan.

The positively prepared test in the NPPF also requires a Council's strategy to be *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*. Runnymede Borough Council remains concerned that Elmbridge has not identified where its unmet needs will be accommodated as required by this test of soundness which is likely to put increased pressure on neighbouring and nearby local authorities. For this reason, it can not be confirmed that the unmet needs of Elmbridge will be met in a manner which is consistent with achieving sustainable development.

Matter 5: Housing Delivery Issue 8 – Whether the approach towards the delivery of housing land is justified, effective, consistent with national policy and positively prepared.

Question 4.15 The Council have stated that the need in Elmbridge is no more acute/intense than in neighbouring boroughs. However, a majority of neighbouring boroughs (Guildford, Waverley, Runnymede, Spelthorne) have progressed a strategy with an element of Green Belt release and/or are able to meet their housing need in full. If the Council consider the need to be no more acute than these neighbouring boroughs, what is the rationale for Elmbridge not following this approach?

OTH043 (paragraphs 6.16 to 6.23 in particular) supports the fact that the need in Elmbridge is more acute/intense than in neighbouring boroughs and the officer advice in this document is that exceptional circumstances can be fully evidenced and justified to ensure that housing needs can be met (para 8.11). Runnymede Borough Council supports this position.

Analysis undertaken by Runnymede Borough Council shows that median house price data as published by ONS consistently shows that Elmbridge is one of the most expensive Boroughs to purchase a house.

-In 2020 it was the 9th most expensive borough and the most expensive outside of London.

-In 2021 it was the 8th most expensive borough in England and the most expensive outside of London

-In 2022 it was the 7th most expensive borough and the most expensive outside of London.

This data suggests that properties in Elmbridge are becoming progressively more expensive compared to other areas.

Elmbridge BC recognises in para 6.22 of OTH043 that Elmbridge has consistently ranked amongst the least affordable Boroughs in England. In 2022 Elmbridge had an affordability ratio of 16.93. This placed them 5th amongst all local authorities for that year behind only Kensington and Chelsea, Westminster, Camden and Hammersmith and Fulham. The affordability issue continues to become more acute. Historic data presented in the table below shows how affordability has worsened over a 4 year period in Elmbridge.

Year	Ratio	Year to year increase	Percentage change (%)
2021/22	16.93	1.88	12.5%
2020/21	15.05	0.63	4.4%
2019/20	14.42	0.73	5.3%
2018/19	13.69	0.31	2.3%

Furthermore, whilst it is appreciated that every Local Authority's local plan must be considered on its own merits, to try and draw some conclusions in terms of whether exceptional circumstances may exist in Elmbridge, Runnymede Borough Council has looked at other Local Plans which have been found sound by the Planning Inspectorate and which have included Green Belt release. Specifically, since January 1st 2022, eight Local Plans have been found sound by the Planning Inspectorate which involve the release of Green Belt land for housing development. These are:

- North Hertfordshire
- St Helens
- Wyre Forest
- Brentwood
- Windsor and Maidenhead
- Calderdale
- Epping Forest
- Warrington

The most relevant paragraphs from each of these Inspector's reports in relation to the finding that exceptional circumstances existed at a strategic level are set out in Appendix A. Pressing housing needs (including reference to particular affordability pressures), the inability of local authorities to meet identified needs in their urban areas, and the inability of neighbouring authorities to assist with meeting needs are all reasons which are commonly identified and which have been found to amount to exceptional circumstances (in different combinations) to justify a release of Green Belt land. At face value, these issues are all relevant to the circumstances currently facing Elmbridge Borough Council.

I hope that this information is helpful.

Yours sincerely



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Appendix 1

North Hertfordshire Inspector's report:

483. In summary, the district's need for housing is acute and pressing. The supply of identified deliverable and/or developable land outside of the Green Belt falls well short of the need – indeed, it is less than half. Given this, the constraints in neighbouring local authority areas, the consequent inability of those authorities to assist in meeting the district's housing need and the absence of any agreement for them to do so, it is impossible to see how anything even close to approaching the identified need for housing could be met without a significant level of Green Belt 'release'.

St Helens Inspector's report:

88. As pointed out earlier neighbouring authorities also have large areas of Green Belt and have similar constraints. The other authorities in the HMA, Halton, and Warrington, have identified a shortfall of urban land supply to meet their own needs. Similarly, none of the authorities in the functional economic area have identified spare urban capacity in order to meet the employment needs of St. Helens. Indeed, many neighbouring authorities have undertaken their own Green Belt reviews to identify land to release from the Green Belt in order to meet their own housing and employment needs. For these reasons, meeting any unmet need within neighbouring authorities is not a feasible option.

90. There is a strong case for meeting the Borough's housing and employment needs in full. Exceptional circumstances exist at a strategic level to justify the Plan's proposals for some Green Belt release.

Wyre Forest Inspector's report:

38. The Council's conclusion that there is insufficient, suitable land outside of the Green Belt to meet the district's needs is evidence-based and robust. Joint working with neighbouring planning authorities shows that there is no reasonable prospect that some of the district's needs will be accommodated in these other areas, large parts of which also lie within the West Midlands Green Belt. In summary, there is compelling evidence that in principle, exceptional circumstances exist which justify alterations to the Green Belt boundary in the Plan.

Brentwood Inspector's report:

73. The delivery of new development within the Borough would contribute significantly towards meeting local housing requirements including the provision of much needed additional affordable housing. This is against a background of persistent under delivery of housing within the Borough and worsening affordability. Without the release of Green Belt land in the Borough of Brentwood, a substantial level of new dwellings would not be delivered.

Windsor and Maidenhead Inspector's report:

98. Documents SD_001 (particularly Section 6) and RBWM_006 explain the Council's reasons for concluding that, at the strategic level, there are exceptional circumstances to warrant altering the boundaries of the Green Belt through the preparation of the Plan. Critically, they include the need for a quantity and mix of housing and employment land which cannot be delivered without the use of Green Belt sites... The Council's reasons also include the poor ratio of house prices to earnings, which is already limiting the ability of younger, working age people to reside in the Borough; the inability of neighbouring authorities to assist the Council with housing delivery; and indeed, the likelihood that other authorities within the HMA will not be able to meet their own needs for development without removing land from the Green Belt.

Calderdale Inspector's report:

101. The Council has held discussions with other authorities about accommodating needs but many of these authorities also have Green Belt land. The Leeds City Region Statement of Common Ground confirms that authorities in the sub-region have agreed to accommodate their own identified needs. The delivery of identified housing needs within Calderdale would help to provide homes for people and facilitate the delivery of additional affordable housing...Without the release of Green Belt land in Calderdale a substantial amount of new dwellings and employment floorspace would not be delivered.

Epping Forest Inspector's report

34 ...there is insufficient land in the district outside the Green Belt to meet all its needs within the plan period. The parts of the neighbouring authorities within the HMA that lie close to Epping Forest District, except for Harlow itself, do not offer the scope to take further unmet needs from Epping Forest.

35. It is important to meet society's basic needs for housing, including affordable housing, associated community facilities, and land for employment. Failure to do so is likely to cause a deterioration in housing affordability and less sustainable patterns of movement as people need to travel further to access employment, education and community facilities. To meet these needs, in the case of Epping Forest District, it will be necessary to alter the Green Belt boundary in certain locations to accommodate them.

Warrington Inspector's report:

114. Given the scale of need for new housing and the lack of sufficient capacity within the urban area, there are in principle exceptional circumstances on a Borough wide level to alter the Green Belt and allocate sites for housing development.