

Sent by email to: [bankssolutionsuk@gmail.com](mailto:bankssolutionsuk@gmail.com)

25/03/2024

Dear Inspector

### Elmbridge Local Plan – Stage 2 hearings

1. In order to help you with regard to the various submissions made to you objecting to the plan a number of parties involved at the hearings, named at the end of this letter, felt it would be helpful to set out our shared position with regard to key pieces of information and evidence with regard to the Elmbridge Local Plan. This evidence is reflected in our individual Reg 19 submissions and our hearing statements, but we thought it would be useful to highlight where there is agreement between some participants as to the plan period, housing needs and past delivery of housing.

### Plan Period

2. Given that the stage 3 hearings are still to be scheduled the earliest the plan could be adopted following a consultation on main modifications is the end of 2024. Therefore, in order for the plan to look ahead for 15 full years from adoption requires the plan to run 2040.

### Local Housing Needs Assessment (LHNA)

3. That the minimum housing needs the council should be planning for is 650 dwellings per annum which over the extended plan period is a total housing need of 12,350 homes. The uncapped LHNA is 930 dpa. As Planning Practice Guidance notes at paragraph 2a-007 the cap reduces the number generated by the standard method but does not reduce housing needs itself. Therefore, in considering whether the Council should seek to amend Green Belt boundaries the Council should take into account the uncapped need for housing in the Borough not just the capped level of need.

**Table 1: Local Housing Needs Assessment**

Annual Household Growth 2023 -2033	Affordability Ratio	Affordability adjustment uncapped	Affordability adjustment capped	LHNA	Uncapped LHNA
------------------------------------	---------------------	-----------------------------------	---------------------------------	------	---------------

H/holds in 2023	H/holds in 2033	Annual H/hold Growth					
57,268	61,914	465	20.04	2.0	1.4	650	930

Source: 2014-based Household projections and ONS House price to work place-based earnings ratio (2022)

## Housing Delivery Test

4. The Housing Delivery Test for Elmbridge is currently 90% but estimates based on delivery of new homes in 2022/23 this will fall to 77% when the update is published.

**Table 2: Housing Delivery Test 2022**

	Number of homes required			Total number of homes required	Number of homes delivered			Total homes delivered	HDT
	19-20	20-21	21-22		19-20	20-21	21-22		
Year	19-20	20-21	21-22		19-20	20-21	21-22		
Homes	573	421	641	1635	396	310	768	1474	90.0%

Source: Housing Delivery Test 2022 (Dec 2023, DLUHC)

**Table 3: Estimated Housing Delivery Test 2023**

	Number of homes required			Total number of homes required	Number of homes delivered			Total homes delivered	HDT
	20-21	21-22	22-23		20-21	21-22	22-23		
Year	20-21	21-22	22-23		20-21	21-22	22-23		
Homes	421	641	650	1712	310	768	240	1318	77.0%

Source: Housing Delivery Test 2022 (Dec 2023, DLUHC) and Live Table 122 Net Additional Dwellings By local authority district 2001-02 to 2022/23 (DLUHC)

## Affordable housing needs and delivery

5. Past need for affordable housing has been taken from the 2020 Local Housing Market Assessment and the 2016 Strategic Housing Market Assessment. In total the Council should have delivered 3,131 affordable homes in order to meet its needs between 2013/14 and 2022/23.

**Table 4: Affordable Housing Needs 2013/14 to 2022/23**

Year	Total AH Needs	% of need met
2022/23	269	5%
2021/22	269	41%
2020/21	269	17%
2019/20	332	38%
2018/19	332	17%
2017/18	332	22%

2016/17	332	1%
2015/16	332	23%
2014/15	332	30%
2013/14	332	14%
<b>Total</b>	<b>3,131</b>	<b>19%</b>

Source: 2020 Local Housing Market Assessment (EBC) and the 2016 Strategic Housing Market Assessment (EBC)

6. However, based on the Council's monitoring reports delivery during this period was only 655 dwellings, less than 19% of what was required, meaning that between 2013/14 and 2022/23 the Council fell short of meeting its identified need for affordable housing by 2,476 homes.

**Table 5: Affordable Housing Delivery 2013/14 to 2022/23**

	<b>Social rent</b>	<b>Affordable rent</b>	<b>Intermediate</b>	<b>Total</b>
Need (2020 LHMA)	68	215	116	399
Need (2016 SHMA)	266	7	59	332
	<b>Social rent</b>	<b>Affordable rent</b>	<b>Intermediate</b>	<b>Total</b>
2022/23	4	2	7	13
2021/22	0	5	106	111
2020/21	0	24	21	45
2019/20	8	68	50	126
2018/19	0	17	40	57
2017/18	8	18	47	73
2016/17	2	1	1	4
2015/16	0	50	28	78
2014/15	39	23	38	100
2013/14	7	24	17	48
<b>Total</b>	<b>68</b>	<b>232</b>	<b>355</b>	<b>655</b>

Source: Elmbridge BC Authority Monitoring Reports 2013/14 to 2022/23

### Green Belt release across Surrey

7. Elmbridge is the only authority proposing at present not to release Green Belt land in order to meet some its housing needs.

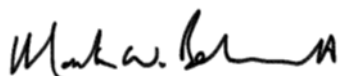
<b>Council</b>	<b>Status of plan</b>	<b>% of LPA in Green Belt</b>	<b>Housing Need</b>	<b>Planned supply</b>	<b>Supply on Green Belt Allocations</b>
Elmbridge	Reg 23	55%	9,705	6,785 (70%)	0

Mole Valley	Main Mods	80%	8,470	6,384 (66%)	1,476
Spelthorne	Reg 24	65%	9,270	8,931 (96%)	855
Epsom and Ewell	Reg 18	42%	10,368	5869 (57%)	3,700
Runnymede	Adopted	79%	7,507	7,507 (100%)	1,676
Woking	Adopted	63.2%	4,964	4,964 (100%)	550
Guildford	Adopted	83.3%	10,678	14,600 (137%)	5,200

## Housing Supply

8. In addition, we note that you have asked within your matter's issues and questions for the Council to provide more detailed evidence with regard to housing supply. Should it be necessary to respond on these matters we would welcome the opportunity to provide you with a shared response to this evidence outlining where we have common ground on the delivery expectations and allocations provided in the Council's statements. We feel that this will assist the hearings and provide you with a single response from a number of those with concerns on these matters.

Yours faithfully



Mark Behrendt  
 Planning manger – SE and E  
 Home Builders Federation

Cc

David Murray-Cox, Turley representing Taylor Wimpey  
 Ben Simpson, Lichfields representing Mac Mic Group  
 Andrew Black, Andrew Black Consulting representing Esher Rugby Club  
 Peter Edwards, Carter Jonas representing Claudel Venture Holdings Ltd.