



Elmbridge Local Plan Examination

Stage 2 Matters Statement

Matter 2 - The approach to housing need

Andrew Black Consulting on behalf of Esher  
Rugby Club

February 2024

Project	Esher Rugby Club
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Author	Andrew Black
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## Elmbridge Local Plan Examination – Matter 2 Statement

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### 1. Introduction

- 1.1 This Matters Statement has been prepared by Andrew Black Consulting on behalf of Esher Rugby Club for Stage 2 of the Local Plan Examination.
- 1.2 Esher Rugby Club is a central feature of the local community within Elmbridge and has long term aspirations to grow as a community-based club as it reaches its centenary year in 2023.
- 1.3 The club has been in discussions with the council for over 15 years on its aspirations for the existing site. The club has engaged with the council and community, at considerable expense, over a number of years to illustrate how the club could grow and evolve sustainably in order to meet the long term needs of the club, its players, its supporters and the wider community in addition to unlocking a highly appropriate area of land for housing growth in order to fund the plans for the club.
- 1.4 It is with considerable disappointment that the submitted local plan does nothing whatsoever to recognise or support the aspirations of Esher Rugby Club, and indeed other sports clubs within the borough.
- 1.5 Each of the Matters raised by the Inspector in document ID-005 (Schedule of Matters, Issues and Questions for Stage 2 of the Examination) are set out within this statement.
- 1.6 Regard has been had to document ID-004 (Guidance Note for People Participating in the Stage 2 Examination). Any reference to the National Planning Policy Framework is in accordance with the previous version. Annex 1 of latest version released in December 2023 sets out the implementation of the new framework for the purposes of plan making and states that previous version of the framework will apply to plans already at examination.



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

**1.1** In establishing the amount of housing to be planned for, paragraph 61 of the Framework advises that strategic policies should be informed by a local housing needs (LHN) assessment, conducted using the standard method unless exceptional circumstances justify an alternative approach. The Council has followed this guidance and calculated the LNH to be a figure of 647 dpa or 9705 dwellings over the Plan period. Are there any exceptional circumstances which would justify an alternative approach?

2.1 It is agreed that the LHN figure at the time of the plan being prepared was 647dpa. However, the baseline at the time of the plan being submitted is 650.

2.2 It is important to note that the baseline requirement for Elmbridge is 461.8dpa. This is adjusted to 650dpa through the application of the capped increase applied to take into account affordability of 185 per annum. The affordability ratio for Elmbridge is 17.32 as of 2021 although is continuing to rise and is now likely to be significantly higher.

2.3 The uncapped local housing need for the council is 930dpa which demonstrates the significant housing need in the borough and the pressing need to address this in light of the requirements of the framework to significantly boost the supply of housing.

2.4 Of significant concern is the decision to not address the significant and unmet affordable housing need in the borough. This was a matter that the council themselves considered within the Establishing Local Housing Need document (HOU001) where it states (with emphasis added):

*5.65) Through engagement with our residents and other stakeholders on the preparation of the draft Local Plan, it has been advanced that the affordable housing need of Elmbridge will not be met through a higher housing target assumed through the standard method. It is stated that land prices will continue to be driven upwards which will impact on viability. Reference is also made to how a higher housing target would rely on small sites on which the collection of development contributions would remain even more difficult. **It is stated that an exceptional bespoke solution to affordable housing is needed for Elmbridge.***

*5.66) Given the high level of affordable housing need within the borough and increasing issues relating to affordability, it is unlikely that the affordable housing needs of the borough will be met regardless of the housing target. As recognised by our communities, housing delivery is currently via the reliance of small sites where developers often cite viability issues. Furthermore, the Government's policy of not permitting affordable housing contributions (both on-site and financial) to be sought on small sites (of 10 or fewer dwellings) is making it increasingly challenging to provide the type of housing needed in the borough.*



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*5.67) Nevertheless, in terms of meeting our affordable housing need, one of the biggest opportunities the council has to do this is through the development of larger sites which, it would be required to consider as part of the options for meeting the standard method figure given that this cannot be met solely within the existing urban areas. Through the delivery of large sites, the council is more likely to see the delivery of affordable housing on-site and at a higher percentage of all units proposed than on smaller sites.*

2.5 It is clear that the council recognised the importance of larger sites to deliver affordable housing, however this is not reflected in the sites selected for allocation within the plan. The Brooklands College application was approved for 320 apartments which included 129 affordable homes (40%). This would not be reflected across many of the allocations within the plan and is also reflected in larger retirement schemes such as the Members Hill site in Weybridge which has planning permission for 176 extra care homes with no affordable housing.

2.6 Reference is also made within the Local Housing Need document to the application of a higher housing requirement for Oxford City Council as follows:

*5.68) Furthermore, with reference to Oxford City Council, they used the issues of affordability and the need for more affordable homes to go beyond the housing figure set out in the standard method. Rather than providing either 764 dpa (capped) or 810 dpa (uncapped) as required by the standard method, they went with a target of 1,400 dpa in recognition that a higher housing target would be required to deliver the level of affordable housing needed.*

*5.69) In addition, the need for affordable homes within the borough is not uncommon amongst neighbouring Surrey Authorities or London Boroughs. In light of this, the council does not consider this to be an exceptional circumstance which would justify the council for deviating from the standard method. Rather, the need for affordable housing within the borough and the limited opportunities to deliver this type of homes within the urban areas, is a driver of higher housing number*

2.7 This demonstrates that the council was alive to the prospect of a higher housing figure being required at the time the plan was being finalised but chose not to consider this route any further. This matter should be further scrutinised at the hearings and the inspector is requested to consider the issues of soundness that arise from the council's position on this matter.

**2.1 Paragraph 61 of the Framework goes on to state that in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Has the Council done this?**

2.8 Further evidence of the council approach to unmet need from neighbouring areas is set out within the Establishing Local Housing Need document (HOU001).



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*5.52) Through engagement with our residents and other stakeholders on the preparation of the draft Local Plan, attention has been drawn to Guildford Borough Council and the claim made that the council has failed to engage with them robustly to secure the oversupply (between their housing need and allocations) and, any allowance to meeting our own housing need from the garden village development at the Former Wisley Airfield site (located in Guildford Borough)*

*5.53) In regard to the allocation at Wisley the council did raise through Guildford's Local Plan consultation that, given the proximity to the Borough boundary, any future development would be meeting the development needs of Elmbridge and not necessarily that of Guildford or their wider Housing Market Area (HMA) which includes Waverley and Woking Boroughs. Unfortunately, these objections were not agreed with and the site has been allocated with no 'allowance' for the development being attributed to meeting the housing needs of Elmbridge.*

2.9 It is therefore clear that the council is acutely aware of the scale of unmet need for Elmbridge and have previously attempted to meet this need in adjoining boroughs without success. In the case of Guildford, that council was meeting its need in full whilst also accommodating unmet need from Waverley and Woking. There was no rationale for any unmet need being accommodated at the Wisley Development and Guildford Council was correct not to agree on this matter.

2.10 The Establishing Local Housing Need document (HOU001) goes on to state:

*5.54) In terms of the Duty to Cooperate, the council has worked tirelessly with other neighbouring authorities, exploring whether the housing needs of Elmbridge could be met by other LPAs. For example, in the 2016/17 Options Consultation, the council stated that if it could not meet its housing needs in full then it would look to other neighbouring authorities as part of the Duty.*

2.11 There is little evidence that the council has worked *tirelessly* in the working with adjoining authorities. It is accepted that the Duty to Cooperate is not a 'Duty to Agree' but the impression that arises from the council position on this is that the council made little attempt from the outset.

**2.2 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?**

2.12 It is noted that Epsom and Ewell Borough Council (CD018), Mole Valley District Council CD019), Runnymede Borough Council (CD023), Guildford Borough Council (CD025) raise concerns on extent of unmet need within EBC and the approach to green belt release.

2.13 In comparison to Elmbridge, the neighbouring LPAs have all made allocations in the green belt as part of meeting supply.



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Council	% of LPA in green belt	Housing Need	Planned Supply	Supply on green belt allocations
<b>Elmbridge</b>	<b>55%</b>	<b>9,705</b>	<b>6,785 (70%)</b>	<b>0</b>
Mole Valley	80%	9,705	6,384 (66%)	1,476
Spelthorne	65%	9,270	8,931 (96%)	855
Epsom and Ewell	42%	10,368	5,869 (57%)	3,700
Runnymede	79%	7,507	7,507 (100%)	1,676
Woking	63.2%	4,964	4,964 (100%)*	550
Guildford	83.3%	10,678	14,600 ((137%)	5,200

2.14 The decision of Elmbridge to not meet housing need in full and to not make any allocations in the green belt is in stark contrast to the approach taken in other LPAs in the Surrey area. It is considered that this will give rise to additional housing pressures in an area already beset by chronic undersupply and a significant backlog of appropriate housing.