



Elmbridge Local Plan Examination

Stage 2 Matters Statement

Matter 4 – The Housing Requirement

Andrew Black Consulting on behalf of Esher
Rugby Club

March 2024

Project	Esher Rugby Club
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Client	Esher Rugby Club

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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.



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

3.1 The housing requirement for Elmbridge has been calculated at 9705 homes. Policy SS3 sets out that the Plan will deliver at least 6785 net additional homes over the Plan period. This equates to some 453 dpa and will leave an unmet need of some 2920 dwellings over the Plan period. This is a significant shortfall. Is the Plan justified in not meeting the full LHN?

3.1.1 No, the plan is in no way justified in allowing for such a significant shortfall.

3.1.2 As set out, Elmbridge Council is alone within Surrey in presenting a brownfield only plan which does not release any green belt land.

Council	Status of plan	% of LPA in Green Belt	Housing Need	Planned supply	Supply on Green Belt Allocations
Elmbridge	Reg 23	55%	9,705	6,785 (70%)	0
Mole Valley	Main Mods	80%	8,740	6,384 (66%)	1,476
Spelthorne	Reg 24	65%	9,270	8931 (96%)	855
Epsom and Ewell	Reg 18	42%	10,368	5869 (57%)	3,700
Runnymede	Reg 18	79%	7507	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

3.1.3 In many other more constrained Surrey boroughs, green belt release has been factored into the spatial strategy in order to deliver a balanced and appropriate spatial strategy. As set out, the original intention of the council was to meet housing need through the release of green belt land. This is set out within the council's own Exceptional Circumstances Case: Green Belt (January 2022) paper which references a number of appropriate sites for release from green belt.

3.14 The council's own evidence base and original direction of travel significantly contradicts the brownfield only approach which is now advanced under the submission version of the plan.

3.15 Whilst it may have been possible to justify a lower amount of housing than the established local housing need, the extent of the undersupply and lack of any consideration of allocation of poorly performing green belt sites is considered wholly unsound.



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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?

3.2.1 The NPPF sets out that local plans must be positively prepared and in order to do so they should provide a strategy which, *as a minimum*, meets the area's objectively assessed needs, and should be informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical and consistent with sustainable development.

3.2.2 It is clear that there are multiple failings of the Elmbridge Local Plan to meet their own needs in full and to work with adjoining authorities in this regard to meet any of their unmet need.

3.2.3 As set out, elements of the council's own evidence base contradict the brownfield only approach and demonstrate that exceptional circumstances exist to justify release of green belt sites but this is not reflected in the submitted plan.

3.2.4 In addition to not being 'properly prepared' the plan is also not considered to be *justified, effective nor consistent with national policy* as also required under paragraph 35 of the framework.

3.3 Part 1a of policy SS3 advises the Plan will make provision for the delivery of at least 30% affordable homes. This would equate to some 2035 affordable dwellings over the Plan period. The Local Housing Needs Assessment (HOU005) sets out a net annual requirement for affordable housing of 269 units, which equates to 4035 units over the Plan period. How does the Plan propose to address this shortfall? Does this approach accord with the Framework?

3.3.1 Between 2013/14 and 2022/23 the council provided only 665 affordable dwellings against a requirement of 3,521 leading to the significant shortfall as correctly identified by the inspector.

3.3.2 As consistently highlighted within this and other matters statements, the 'brownfield only' approach of the council will do nothing to address this shortfall which will continue to amass over the plan period.

3.3.1 The framework is clear that the housing needs of groups with specific requirements are addressed. The plan as submitted would fundamentally fail to address the chronic affordable housing shortfall in the borough and would do nothing to address needs going forward. For this reason alone, the plan should be viewed as unsound and requires significant modification through allocation of additional sites to remedy this position.