

## Home Builders Federation

### Matter 4

#### 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.*

#### *Questions*

*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?*

The HBF do not consider the plan to be justified in not meeting housing needs in full. The HBF do not disagree with the fact that the NPPF states that there will be circumstances where needs may not be met in full due to constraints. However, paragraph 11 is clear that the application of the policies in the NPPF must provide a strong reason for restricting the overall scale, type and distribution of development in the plan area. The HBF argue that whilst Green Belt may provide a reason for restricting growth the council's own evidence indicates that there are parcels of land that are not performing strongly against the purposes of Green Belt and as such there are not, in relation to this particular national policy, strong reasons for failing to meet housing needs, especially when considered against the scale of need for both market and affordable housing in one of the most expensive parts of the country to buy or rent housing.

As we set out in our representations the Council has submitted evidence, the Green Belt Review prepared by ARUP that identifies areas of land that it considered not to be



performing strongly with regard to the purposes of Green Belt. Indeed, the paper prepared by the Council in January 2022 and submitted post examination (OTH43) makes a sound case for amending Green Belt boundaries and shows that the impact of releasing land from the Green Belt to meet development needs was minimal resulting in a 3% reduction in the Green Belt, with just 1.5% of the land removed being subsequently developed.

However, rather than engage with what are difficult decisions to amend Green Belt boundaries in order to provide much needed housing the Council instead decided to prepare and submit a plan that did not amend green belt boundaries and fell well short of meeting needs in full.

In order to justify this plan, the council revisited its own evidence and now disagrees with the Green Belt boundary review it commissioned. As set out in our representations there are significant discrepancies in the council's assumptions in Topic Paper 1 (TOP001) that render that paper wholly inadequate as a justification for not amending Green Belt boundaries in order to meet housing needs. The paper lacks any kind of robust or independent judgement and has been prepared following the decision to prepare a plan that does not amend green belt boundaries. This is wrong. Plans should be based on objective and robust evidence prepared prior to any decision on the spatial strategy to be adopted and not on assessments prepared once the strategy has been decided.

*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?*

No. As set out above the plan is a negative one and that in preparing this plan the Council have taken a negative approach to new development and the need for more homes in the area. Preparing a local plan is a balancing act but in failing to engage properly with the evidence and issues at hand the council have appeased the few and taken no responsibility for those in housing need. With regard to housing needs, and in particular the delivery of affordable housing, the plan is woefully inadequate and will be wholly ineffective in addressing the issues faced by Elmbridge.

*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 2,035 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 4,035 units over the Plan period. How does the Plan propose to address this shortfall? Does this approach accord with the Framework?

No. There is no certainty that this level of affordable housing delivery will be achieved based on the spatial strategy prepared by the Council. Since 2013 the Council have delivered an average of just 66 affordable homes per annum. This level of delivery is on the basis of a spatial strategy that is no different to the current Core Strategy, aside from the added costs such as Biodiversity Net Gain and the higher technical standards to come as part of the Future Homes Standard. No mechanisms have been put forward to address these shortfalls and will mean waiting lists continue to grow. Recent evidence published by the LGA show that waiting list for affordable housing have risen over the last five years from 33.7 per 1,000 households in the Borough in 2018/19 to 41.6 per 1,000 households in 2022/23. This is an increase from about 1,800 households to 2,300 households.

However, the HBF consider the Councils assessment as to the number of affordable homes that will be delivered to be overestimated.

Mark Behrendt MRTPI

Planning Manager – Local Plans SE and E

