

# Examination Statement

---

**Examination Elmbridge Local Plan 2037:  
Response to the Schedule of Matters, Issues and Questions for  
Stage 2 of the Examination**

**Matter 4: The housing requirement**

**Prepared by Savills on behalf of The Crown Estate**

# 1. Introduction

---

- 1.1. See Introduction to The Crown Estate (TCE) and Telereal Trillium (TT) Group in the **Matter 2 Statement**.

## 2. Response to MIQs – 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 3.1: 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?**

- 2.1. No. However, before answering the question, it is important to note that the 'housing requirement' has not been calculated as being 9,705 homes; this figure is the identified, capped, 'housing need'. As submitted, the eEBLP does not include a 'housing requirement'.
- 2.2. The NPPF and PPG require that the identification of the 'housing need' prior to the separate process of arriving at a 'housing requirement', before considering the availability of sites to meet the identified requirement, and thus arriving at the proposed 'housing supply'.
- 2.3. Policy SS3 sets out that the eEBLP will 'make provision' for at least 6,785 homes; this is the proposed 'housing supply'.
- 2.4. It is unclear whether EBC intend the figure of 6,785 to also represent the 'housing requirement', against which future 'housing delivery' will be measured.
- 2.5. If so, then the eEBLP is proposing a 'housing supply' to meet exactly 100% of the proposed 'housing requirement', with no buffer to that.
- 2.6. Further, as discussed in relation to **Matter 3**, the plan period should be extended by 3 years to 2040. This would mean that there would be a (capped) housing need of 11,646 homes. The evidence published in support of the Local Plan (including the housing trajectory at Appendix 5 to the Plan) does not set out how many additional homes would be supplied over the additional 3 years, and as the proposed 'housing supply' figure is currently being proposed as the proxy for the 'housing requirement', it cannot (yet) be determined what the 'housing requirement' over an extended plan period might be. The starting point is likely to be to consider whether exceptional circumstances to review the Green Belt are demonstrated, and then to consider what pipeline supply is possible, which may be within the housing need over the extended plan period.
- 2.7. A shortfall in the proposed 'housing requirement' / 'housing supply' of at least 3,000 homes (c. 30% of the identified, capped, 'housing need') in an area that is suffering with one of the worst levels of housing affordability in the country, is a key issue, which acts to justify the exceptional circumstances to justify changes to the Green Belt.
- 2.8. Further, this is based on a plan period 2022 to 2037; for an extended plan period of 2022 to 2040, the eEBLP still only identifies a housing supply of 6,785 homes against a Standard method LHN of 11,646 homes – a supply equivalent to less than 60% of the identified need.

- 2.9. Full scrutiny of the implications arising from the decision not to engage Green Belt exceptional circumstances is required, to establish if any further sites could be allocated (e.g. as mooted under SA Option 5a). This should include any which perform poorly against the Green Belt purposes and are in sustainable locations 'at' (i.e. adjacent to) a settlement. The evidence prepared by ARUP is relevant and indicates that sites such as the highly sustainable Land west of Claygate Station can be released, without harming the wider purposes of the Green Belt.

**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?**

- 2.10. No. The eEBLP will have either negative, or reduced positive consequences for factors such as housing, affordable housing, the economy and environmental gain. The eEBLP does not, as a minimum, seek to meet the Borough's identified LHN as required by the NPPF (para. 35(a)).
- 2.11. There are also no agreements in place with neighbouring LPAs (see further discussion in TCE's **Matter 2 Statement**). EBC have a responsibility to seek to minimise this issue, through making suitable allocations which will deliver much needed new homes (best achieved via a diverse mix of sites).
- 2.12. No objection is raised to any of the proposed site allocations. In principle, the proposed approach of c. 200 brownfield site allocations is a laudable objective, but it is considered that it stands a significant risk of becoming ineffective through a failure of sites to deliver as hoped, whether entirely, or in some regard such as the delivery of affordable housing. Any failure in this supply, supported as it is by only limited greenfield sites, and importantly no supply buffer, could easily result in unsustainable and unplanned consequences.
- 2.13. Savills considers that regard should be had of other Local Plans recently adopted nationwide, which have made Green Belt releases. All of these have been in areas with similar Green Belt constraints, but where housing is already more affordable, but where the combination of housing need and affordability has been deemed to represent exceptional circumstances that justify a review of the Green Belt. Various other LPAs in Surrey, such as Guildford, Reigate & Banstead and Runnymede have made allocations within the Green Belt to boost the supply of homes and attempt to meet their identified housing needs. See further discussion in TCE's **Matter 5 Statement**.

Question 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?

- 2.14. No. See also the response to Q. 2.21 in TCE's **Matter 3 Statement**.
- 2.15. On the basis of the present spatial strategy in the eEBLP, the figure of 2,035 affordable dwellings (30%) should be considered the maximum possible, particularly given the limited number of greenfield sites in the proposed housing supply (which would be subject to the 40% requirement), and the much greater number of smaller and/or brownfield sites (which would be subject to a 20% or 30% requirement). A relevant consideration in any review of the spatial strategy / planned supply should be the likely provision of affordable housing. For example, the highly sustainable Land west of Claygate Station will be able to deliver a much greater proportion of policy compliant affordable housing.

c.915 Words

**Charles Collins**

Director

+44 (0) 7870 999 596

[ccollins@savills.com](mailto:ccollins@savills.com)

**Jonathan Dixon**

Director

+ 44 (0) 7870 000 576

[jonathan.dixon@savills.com](mailto:jonathan.dixon@savills.com)