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Hearing Statement

Elmbridge Local Plan

Submission on behalf of PA Housing

Relating to Matter 4

Client: PA Housing
Date: March 2024
Ref: SHP022003-2

shp

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Background

1.1 These comments are made on behalf of PA Housing. PA Housing is a local Registered Provider of Affordable Housing, formerly known as Elmbridge Housing Trust, which owns a considerable amount of stock in the Borough, most of which was formerly council stock until transferred several years ago. Currently, PA Housing hold about 5000 dwellings in Elmbridge as well as some specialist accommodation. Each year PA Housing aim to deliver about 70 affordable homes in Elmbridge.

1.2 PA Housing made comments on earlier stages of the Local Plan and the comments below are made in the spirit of constructive criticism in order that the Local Plan can deliver the affordable homes so desperately required in Elmbridge.

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.

2.1 The requirement for homes has been estimated as 9705, yet policy SS3 states only 6,785 net additional homes will be provided 2021 to 2037, 30% of which will be affordable. Not only does this policy fail to meet the requirement, but it also implies that the 2036 affordable homes will need to be provided on the back of 4749 market housing units through S106.

2.2 When we look at the site allocations listed in chapter 9, only 97 of a total of 186 allocation sites are above the site threshold of 10 plus units where 30% affordable housing can be sought. The 97 sites allocations would deliver around 3,400 homes of which just over 1000 might be affordable if 30% is achieved on each site. This would be only slightly more than 2 years' worth of needed affordable homes.

2.3 Of course, the Council will say that their proposed affordable housing policy will require smaller sites to make a financial in-lieu contribution. This is all very well, but it is sufficient suitable sites Elmbridge lacks; building up a pot of contributions is not beneficial unless there are sites where the money can be used to provide additional dwellings to increase the affordable housing stock.

2.4 It is quite apparent that there is no justification for the Plan not meeting the LHN and one of the consequences of this is that insufficient affordable housing will be delivered contrary to para. 63 of NPPF2023. In addition, it is clear that the Plan has not been positively prepared as required by para. 35 of the NPPF2023. The Plan does not, as outlined above, address the shortfall in affordable housing over the Plan Period and as such the approach does not accord with the NPPF2023.