

# **Stephen Hinsley**

Town Planning Consultant

## **Hearing Statement**

### **Elmbridge Local Plan**

#### **Submission on behalf of PA Housing**

#### **Relating to Matter 5**

Client: PA Housing  
Date: March 2024  
Ref: SHP022003-3

**shp**

5 Bergamot Close  
Sittingbourne  
Kent ME10 4EY

PHONE  
MOBILE 07831 520004  
EMAIL [steve@stephenhinsleyplanning.co.uk](mailto:steve@stephenhinsleyplanning.co.uk)  
WEBSITE [www.stephenhinsleyplanning.co.uk](http://www.stephenhinsleyplanning.co.uk)

## **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 5: Housing Delivery**

*Issue 8 – Whether the approach towards the delivery of housing land is justified, effective, consistent with national policy and positively prepared.*

2.1 The Council has chosen to disagree with their own advisors ARUP on areas in the Green Belt which perform weakly. There is no evidence from the Council which explains why it chose to disagree with ARUP.

2.2 The Council has stated that the housing need in Elmbridge is no more acute than in neighbouring boroughs. This is questionable, particularly in relation to affordable housing. However, as highlighted by the LP Inspector at 4.15, Guildford, Waverley, Runnymede and Spelthorne have pursued a strategy with an element of Green Belt release and/or are able to meet their housing need in full. There is no rationale for Elmbridge not following the Strategy of its neighbours and to release parts of the Green Belt for housing. We have already pointed out in our response to Issue 7 how the proposed Elmbridge Strategy will not go anywhere near delivering the chronic need for affordable housing. Poorly performing areas of the Green Belt have been identified by the Council's own consultants and these can and should be released for housing. The Council has not shown how the Green Belt in Elmbridge provides a strong reason for restricting the overall scale, type or distribution of development.

2.3 Similarly, the Council has not provided any evidence to support its claim that to release Green Belt for housing would adversely affect the borough's existing settlement pattern and cause harm to the character of Elmbridge's existing communities.

2.4 Without releasing sites in the Green Belt, the objectively assessed housing needs as required by para. 35 of the NPPF2023, particularly those requiring affordable housing. Far from planning to meet the needs of those in most need of a roof over their head, the Strategy will simply lead to those households having to wait far longer on the Housing Register.

2.5 The Council has not demonstrated that Green Belt boundaries will not need to be altered at the end of the Plan period.

2.6 Contrary to NPPF2023 policy the Council has not identified specific deliverable sites sufficient to provide a minimum of five year's supply of housing against requirements. As such the Plan has not been positively prepared. Moreover, the Council has not demonstrated how, upon Plan adoption, there will be a five-year supply of deliverable housing sites.

2.7 Whilst it is noted that the greatest demand for housing is for 2 bedroomed accommodation, it does not reflect the particular needs of those requiring affordable housing where larger family units are required.