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Hearing Statement

Elmbridge Local Plan

Submission on behalf of PA Housing

Relating to Matter 6

Client: PA Housing
Date: March 2024
Ref: SHP022003-4

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 6: Affordable Housing

Issue 10: Does the Plan set out a justified and effective approach to the provision of affordable housing?

2.1 We say that the need for affordable housing in Elmbridge is at least 484 dwellings per annum (see submission on Regulation 19 Plan). We also say that it would be reasonable for the backlog need to be met over 5 years rather than 20 years as proposed. It must be remembered these 1434 households who make up the backlog need are real people living in unsuitable accommodation, for example living in overcrowded private rented homes, “concealed” households or homeless. It is neither sustainable nor acceptable to expect these households currently in need to wait 20 years to have the opportunity of being suitably housed.

2.2 As explained in Issue 7, the Council has not properly considered increasing the total housing requirement to deliver the required number of affordable homes: it is not even planning to meet its objectively assessed housing need.

2.3 Elmbridge is already the most expensive place to live outside London. In 2022 median workplace earnings for Elmbridge was £34,927pa. The median house price in Elmbridge for 2022 was £700,000. This points to an affordability ratio of just over 20 times salary to afford an average house (Source: Housing affordability in

England and Wales: 2022, ONS). If the Strategy of the Plan is pursued, the affordability ratio will continue to increase.

2.4 In addressing Matter 4, we have explained how in Elmbridge it is the artificially constrained supply of land upon which affordable homes can be delivered which is the main issue. In short, there are not the sites available for the contribution “pot” to deliver additional affordable homes, and why there is a need to release land in the Green Belt for housing.

2.5 The small sites contribution towards the delivery of affordable housing should only be regarded as having a limited impact on overall delivery of affordable homes: what is required are Green Belt release sites on which a greater proportion of affordable homes can be delivered on the back of market housing through Section 106.

2.6 As stated in our response to Matter 4, without the release of Green Belt housing sites, just over 1000 affordable homes are likely to be delivered over the 15-year Plan period. The Plan does not contain a Strategy for delivering the full need for affordable housing.

2.7 It is important that any financial contribution methodology is set out in the Development Plan policy so that it may be rigorously tested. Both the NPPF2023 (para. 34) and the PPG (para.004) confirm that policies for planning obligations should be set out in Plans and examined in public; it is not appropriate for formulaic approaches to be left for SPD. Moreover, there should always be a provision in policy for further viability assessments to be undertaken at decision making stage.

2.8 As set out in the response to Matter 4, the reliance on small site allocations will not deliver sufficient affordable homes to meet identified need. The approach in the Plan is neither justified nor effective.

2.9 Finally, having recognised that meeting affordable housing need will be via larger mixed tenure sites through section 106, it is not understandable why the council has not proposed a spatial strategy which includes sites, Green Belt releases where sufficient affordable homes can be delivered. The implications of this are that insufficient affordable homes will be delivered across the Plan period.