

**Elmbridge Local Plan 2037  
Examination of the Local Plan**

**Matter 6: Affordable Housing**

Statement on behalf of Taylor Wimpey

March 2024

**Turley**

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**Client**  
Taylor Wimpey

**Our reference**  
TAYR3017

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# 1. Introduction

- 1.1 This Statement is submitted on behalf of Taylor Wimpey to Stage 2 of the Elmbridge Local Plan Examination and in response to 'Matter 6: Affordable Housing as set out in the Inspector's 'Schedule of Matters, Issues and Questions for Stage 2 of the Examination' (document ID-005).
- 1.2 This Statement should be read in conjunction with the other Statements submitted on behalf of Taylor Wimpey, and their representations to consultation on the draft Local Plan.
- 1.3 Taylor Wimpey has an interest in, and has actively promoted the land west of Woodstock Lane North, Long Ditton to the emerging Local Plan. The representations submitted to the Regulation 19 draft of the Local Plan included a Vision document which demonstrated how the site could be developed and a Technical Note regarding the site access arrangements and its accessibility.
- 1.4 The land promoted by Taylor Wimpey west of Woodstock Lane North, Long Ditton is currently within the Green Belt. However, at the previous consultation stage<sup>1</sup>, this land was identified (via Options 3 and 5 (including 5a)) as a one of three 'Key Strategic Areas', including an area of retained open space and a 'Potential Development Area to be Master planned'.
- 1.5 This Statement has been prepared on the basis that the Local Plan is to be examined against the NPPF published in 2021. Unless specifically referred to, any references to the NPPF are to that version.

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<sup>1</sup> The 'Options Consultation' undertaken in 2019

## 2. Response to Matter 6: Affordable Housing

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

**5.1 The evidence identifies housing need of 269dpa. HOU5 sets out that there is a backlog need of affordable housing of 1434 units. The Plan proposes to address this backlog and need over a period of 20 years. The evidence states that in the context of a high demand area such as Elmbridge, an extended period is likely to be necessary. What is the reason for this and does it present a justified approach? Will it prove effective in addressing need?**

- 2.1 Taylor Wimpey consider the existing backlog of 1,434 affordable housing units to present a significant matter that the draft Local Plan should seek to address early-on in the draft Local Plan. It is not effective nor justified to stall and delay the delivery of much-needed affordable homes, a matter that is directly affecting existing and prospective residents within Elmbridge and surrounding areas.
- 2.2 To delay the delivery of much needed affordable housing across the twenty-year period would achieve nothing in addressing the needs of people who cannot, today, afford to access housing in Elmbridge Borough..
- 2.3 It is therefore imperative that the draft Local Plan seek to resolve this backlog, alongside existing and forecast **need** for affordable housing as soon as it is able, than to extend the backlog of housing beyond the plan period. The current draft Local Plan does not achieve this.
- 2.4 Chapter 9 of the draft Local Plan identifies the Council's set allocations, of which approximately 576 dwellings are located on sites that sit below the threshold of policy HOU5 in requiring on-site delivery of affordable housing (9 dwellings or fewer).
- 2.5 As currently drafted, the Policy requires that these sites (9 dwellings or fewer) provide a financial contribution equivalent to the provision of 20% affordable housing of the gross number of dwellings.
- 2.6 Whilst not discouraging the utilisation of small sites to deliver much needed housing in the wider Elmbridge Area, Taylor Wimpey strongly consider that the use of extensive brownfield land to deliver the required need of housing (and as a consequence, affordable housing) given the well-known difficulties associated with land ownership, construction costs, remediation and site constraints is neither sound nor effective. Such a flaw is recognised in the Council's Topic Paper 1 (How the Spatial strategy was formed, 2022) , whereby Spatial Strategy Option 4 readily acknowledges that "Option 4 fails to plan for all the homes needed" and that there "would be fewer new affordable homes built on smaller brownfield sites, this is because, typically smaller, brownfield sites cost more to redevelop and often squeeze profitability, limiting the amount of affordable housing that can be provided by a developer".
- 2.7 The Council's Topic Paper 2 (Affordable Housing) recognises that "without the ability to collect affordable housing contributions on small sites, the council will significantly limit

its capacity to support the delivery of affordable housing in the borough” (emphasis added). Yet there remains no guarantee on the viability of minor planning applications of development to readily contribute to off-site financial contributions directly to affordable housing.

- 2.8 As such, of the sites expected to deliver a 20% financial contribution, there is no mechanism that guarantees where (or when) the proposed contribution to affordable housing will be spent, if indeed where it is best suited to meet the need in the Borough, or indeed when in the plan period the pot of monies associated with off-site contributions would come forward within the plan period, if at all. This negates the effectiveness of this Policy to contribute to mitigating the existing, significant backlog of affordable housing.
- 2.9 Furthermore, the discussion set out above does not include any allowance for situations where viability concerns associated with the delivery of brownfield sites stifle the delivery of affordable housing and indeed market housing respectively. Where viability concerns are likely to be present on minor developments of 9 dwellings, it can be anticipated that an additional dwelling, on top of other requisite infrastructure contributions or otherwise, would significantly reduce the available monies to be directed to affordable housing delivery elsewhere in the Borough.
- 2.10 In fact, the Establishing Local Need (2022) evidence paper, the Council readily acknowledge that “in terms of meeting our affordable housing need, one of the biggest opportunities the council has to do this is through the development of larger sites which, it would be required to consider as part of the options for meeting the standard method figure given that this cannot be met solely within the existing urban areas. Through the delivery of large sites, the council is more likely to see the delivery of affordable housing on-site and at a higher percentage of all units proposed than on smaller sites.”
- 2.11 However, in spite of this, Paragraph 5.64 of the Establishing Local Need (2022) paper, the Council consider that the “the affordable housing need of Elmbridge will not be met through a higher housing target assumed through the standard method.”
- 2.12 It is of paramount importance that the Council does not unduly restrict the delivery of affordable housing on the premise that it will not be able to meet its needs regardless of the strategy proposed. In accordance with the government’s objective of “significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.”
- 2.13 In our view, that statement in the Establishing Local Need Paper is fundamental flawed. Increasing the housing requirement to the ‘capped’ Local Housing Need figure would provide a greater prospect of affordable housing needs being met. However the Council would be wrong to assume that the capped figure is all that should be considered. Increasing the requirement to the ‘uncapped Local Housing Need’ figure would, in all likelihood, allow for the annual affordable housing needs to be achieved.
- 2.14 As a result, the inability of the plan to accommodate or indeed facilitate additional affordable housing delivery is a serious flaw of the draft Local Plan that needs to be rectified in order to be sound.

- 2.15 Taylor Wimpey therefore have extremely significant concerns that the strategy sought by the emerging Local Plan in its approach to affordable housing delivery. In directing its housing need directly to a large quantum of small brownfield sites, the Council significantly and demonstrably undermines the delivery of affordable housing in the Borough in a manner which would not see the backlog of affordable housing addressed over the plan period or the forecast needs for affordable housing to be met. To extend and by default, delay the delivery of affordable housing over an extended period, would not result in a sound or effective approach in resolving the affordable housing crisis in Elmbridge.

**5.3 The Planning Practice Guidance States that an increase in the total housing figures included in the Plan may need to be considered where it could help deliver the required number of affordable homes. Have the Council considered this?**

- 2.16 Taylor Wimpey draw attention to this matter in other requisite hearing statements, and whilst not repeated here, it is imperative to note that increasing the housing need in the Plan is fundamental to addressing the affordable housing need and backlog immediately and throughout the lifespan of the emerging Plan.
- 2.17 To ensure the Plan is sound and effective, it is critical that the Local Plan should seek to meet (as a minimum), the Local Housing Need requirements, and identify further sites, where appropriate, as a means to meet the need in accordance with the requirements of the Framework.
- 2.18 The above is not accounting for the likely tenure split or housing mix sought on development in urban areas, considered and acknowledged by the Council to be flatted developments, likely of no more than 3 bedrooms as means to maximise urban density and effective use of land as directed by the Council's proposed Spatial Strategy. Thus, it is readily acknowledged that the emerging Elmbridge Local Plan is failing to deliver the quantum and mix of market and affordable housing to meets its needs.
- 2.19 In doing so, the Plan fails to meet the requirements of Paragraph 64 of the Framework that requires that, *where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:*
- a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and*
  - b) the agreed approach contributes to the objective of creating mixed and balanced communities.*
- 2.20 The draft Local Plan fails to achieve a balanced and mixed communities through its failure to plan for requisite housing numbers. The Council's evidence claims that *"in order to deliver the full 269 dpa the Council would therefore need to broadly double the quantum of development in the DELP to 13,600 homes. A quantum of development that significantly exceeds that needed to meet the Borough identified housing need using the standard method (circa 9,500 homes) in full."*

- 2.21 The Council's comment in that regard fails to recognise that the LHN in this case is 'capped' but does not reflect 'need' as a result.
- 2.22 Notwithstanding the above, it is clear that through an appropriate assessment of reasonable alternatives, the Council can accommodate additional and proportionate growth beyond what is currently stated within the draft Plan. As a result of the self-fulfilling process of only directing growth the urban areas, the draft Local Plan fails in its ambition to be justified and positively prepared and thus is unsound.

**5.4 In pursuing a strategy which fails to meet the boroughs affordable homes needs over the Plan Period, what are the likely implications of this strategy for affordability ratios.**

- 2.23 The draft Local Plan acknowledges that the borough of Elmbridge is '*one of the most expensive areas in the country to live*', later describing this as '*a significant issue*' and '*a key priority for the council*'<sup>2</sup>.
- 2.24 The situation has only worsened since the draft Plan was produced, in June 2022. The Office for National Statistics (ONS) was then reporting that median house prices in Elmbridge equated to circa 17.8 years the earnings of local workers, which was indeed amongst the highest in England ranking ninth out of 309 local authorities<sup>3</sup> (or third when excluding London boroughs). The ONS did though release new affordability ratios in March 2023, confirming that house prices in the borough over the year to the prior September equated to some 20.0 years' earnings<sup>4</sup>. This was the fourth highest in the country and made Elmbridge only the fifth authority – and the first outside London – to have ever recorded such a severe imbalance between median house prices and earnings.
- 2.25 The draft Plan clearly acknowledges the consequences of this worsening issue, admitting that '*too many young people and families are moving out of the borough to have a realistic prospect of owning or renting their own home*'<sup>5</sup>. The subsequent release of data from the 2021 Census starkly illustrates the extent to which this is occurring, confirming that the number of younger residents aged 25 to 39 declined by some 8% during the decade since the 2011 Census. This came despite the overall population growing by some 6% over the same period.
- 2.26 The draft Plan also describes how '*older residents are struggling to affordably downsize*'<sup>6</sup>. The 2021 Census again reaffirms the scale of this issue, confirming that a third (33%) of all households in the borough led by an individual at least 65 years old were living in homes containing at least four bedrooms. This is a higher figure than was recorded in all but two other authorities in England.
- 2.27 There is no doubt therefore, that the Council's inability to meet the affordable homes needs over the Plan period would directly worsen affordability ratios in the borough,

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<sup>2</sup> Elmbridge Borough Council (June 2022) Regulation 19 Draft Elmbridge Local Plan 2037, paragraphs 2.7 and 6.24

<sup>3</sup> ONS (March 2022) Housing affordability in England and Wales: 2021, Table 5c

<sup>4</sup> ONS (March 2023) Housing affordability in England and Wales: 2022, Table 5c

<sup>5</sup> Elmbridge Borough Council (June 2022) Regulation 19 Draft Elmbridge Local Plan 2037, paragraph 2.7

<sup>6</sup> *Ibid*, paragraph 2.7

that is already one of the worst in the country, and result in the failing of the objectives and requirements of the Plan in planning to meet its identified needs.

2.28 The above is notwithstanding the wider social, economic, and environmental concerns of a failing to provide accommodation for young peoples and expanding families, and the right mix of housing allowing for residents to downsize as a result of worsening affordability ratios.

2.29 The draft Plan should directly seek to significantly boost the supply of housing, including affordable housing, in a manner that reflects the identified Local Housing Need in full. To achieve this, a balanced approach is required of the draft Local Plan, beyond what is currently proposed to enable housing, including affordable housing to come forward in the right locations. In turn, a positively prepared plan would seek to provide the right homes, in the right places with supporting tenure mix and dwelling size, including dwellinghouses, to allow young and growing families to rightfully rent and own their own property in Elmbridge. At present the draft Local Plan is unsound in its approach that will have a detrimental effect on what is already a vastly poor affordability ratio for the borough that will only worsen if the housing requirement is not positively prepared for and effective through its strategic policies.



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