

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

Matter 7: Other Housing Matters

Statement on behalf of Taylor Wimpey

March 2024

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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 7: Other Housing Matters 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 stage¹, 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.

¹ The 'Options Consultation' undertaken in 2019

2. Response to Matter 7: Other Housing Matters

Issue 11: the approach to housing mix, density and specialist accommodation including providing for gypsy and travelling show people accommodation as well as that of boat dwellers justified, positively prepared and effective?

HOU011 is a Density Study for the Borough as a whole. It states that the evidence collected will assist with the formation of a new density policy. The report concludes that existing densities in urban areas are low (below 30dph). Permissions for new development are exceeding existing densities with the highest densities achieved in an around town centres and station locations and with the exception of Walton on Thames, most of the borough is characterised by low rise development. The report recommends that high densities should be encouraged within town centres, and around train stations.

Policy HOU2: Optimisation of sites

6.2 Does the Urban Capacity Study (HJPOU12) present a robust assessment in terms of the conclusions drawn in relation to urban capacity.

- 2.1 As a matter of general principles, we are concerned that this Local Plan, being inherently based on the use of previously developed land, is based on evidence which is informed by evidence was produced in 2018, 6 years ago.
- 2.2 Paragraph 7.1 of the UCS recognises that whilst capacity does exist within the existing built-up areas within Elmbridge, *“it will not provide all of the answers: consideration will likely need to be given to releasing some of the Green Belt for new housing - some of which is within close proximity to railway stations, town and district centres, and thus which may comprise ‘sustainable’ locations for growth”* (emphasis added).
- 2.3 Table 11 of the UCS identifies potential for approximately 5,454 new dwelling units in the built-up area over a fifteen-year period.
- 2.4 The UCS also identifies approximately 580 units to come forward on small sites (comprising 5 units or less). Whilst acknowledging potential for development from this source does exist, given well-versed issues of delivery and viability of brownfield development, Taylor Wimpey would like to take this opportunity to reiterate how the over-reliance of delivery of sites in urban areas directly hinders its ability to secure and deliver a variety of mix of housing sizes and much-needed affordable housing to address its recognised shortfall.
- 2.5 It is important that future growth is planned for in a way that makes most efficient use of land and that contributes to the achievement of sustainable development (which is central to the National Planning Policy Framework).
- 2.6 Taylor Wimpey do not disagree with the findings that high densities should continue to be encouraged within town centres, but would emphasise that, the findings that the optimisation of town centre sites at high densities, on its own, is not a sound or

justified approach to meeting the housing needs of Elmbridge, in particular with respect to the delivery of specialist and affordable housing against an identified need.

- 2.7 Chapter 9 of the submitted Draft Elmbridge Local Plan identifies Site Allocations, much of which is within the urban areas, with a significant number of these allocations falling below the 10-unit threshold for the delivery of affordable housing.
- 2.8 In highlighting the flawed approach to the Plan, Paragraph 5.31 of the UCS foresaw how taking this approach, in allocating a significant number of low-unit, brownfield sites, would be unlikely to have any impact on the delivery of affordable housing whereby anticipated yields fall below the recognised threshold for the delivery of on-site affordable housing. In addition, recognises that sites below the eleven-unit threshold for affordable housing delivery (as per the adopted Development Plan). Further detail on this point is raised in other Hearing Statements submitted by Taylor Wimpey.
- 2.9 Thus, even if the Council anticipate a number of these dwellings allocated through the emerging Plan come forward through Permitted Development applications, to convert existing commercial and office units into residential accommodation in the urban areas, there remains no obligation and/or mechanism whereby this source of development can effectively contribute to affordable housing supply within the Borough.
- 2.10 As set out in this Hearing Statement, alongside others prepared and submitted by Taylor Wimpey in response to the Inspector's Matters, Issues, and Questions, it is clear that the Council's approach to the Spatial Strategy on account of its assessment of the supporting evidence base to be flawed and unjustified in accordance with Paragraph 35 of the National Planning Policy Framework and thus the Plan remains unsound.

Policy HOU3 – Housing Mix

6.6 Will the policy as drafted deliver the right homes to address local need as envisaged by the Framework?

- 2.11 No.
- 2.12 Paragraph 63 of the Framework requires that *“the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing”*.
- 2.13 Policy HOU3 does not specify any anticipated mix of homes, for Elmbridge, simply relaying needs *“as set out in the most recent assessment of local housing need”*.
- 2.14 The most recent assessment of local housing mix is identified in Table 32 of HOU015 Kingston and North Surrey Strategic Housing Market Assessment – Area Profiles (SHMA, 2016).
- 2.15 Notwithstanding that this evidence being prepared circa 10 years prior to the anticipated adoption of the Plan, and thus not accounting for any changes in

circumstances since that point, that might affect the above requirements, it is evident that the policy, as drafted, will not deliver the requisite mix of the “right homes” as identified through the Framework.

- 2.16 We note that the Council’s evidence refers to the need for dwellings of 1 – 2 bedrooms. However, the evidence also (for example the SHMA Area Profiles (document HOU15) identifies a need for 30% of new homes to be 3 bedrooms or larger.
- 2.17 As identified earlier in this Hearing Statement, the Council have made a significant number of housing allocations in Chapter 9 of the draft Plan on brownfield land.
- 2.18 The Plan does not stipulate how, or in what manner these sites might come forward, although given the constrained brownfield nature and the spatial strategy to optimise small centre town centre sites and those close to railway stations, it should be recognised that the provision of 3 and 4+ bedroom dwellings would not represent the most ‘efficient’ use of land in town centre locations, with a recognised preference for flatted development in town centre locations. In fact, that concern is reinforced by Policy SS2(d) which expects, in order to support the optimisation of development within the urban area to increase the efficient use of land *“All new residential development adjacent to town, district and local centres and train stations, should be predominately one- and two- bedroom homes. An exception will be made for proposals for one for one replacement of an existing home.”*
- 2.19 Despite this, it is clear from the supporting evidence to the Plan that the projected requirement of larger residential units (3 and 4+ bedroom dwellings) equates to 59% of the projected needed dwelling size needed across the plan period (although we note that the timescales within the SHMA do not cover the proposed plan period, given the dated nature of its publication, the SHMA only anticipates a required need to 2035).
- 2.20 Further, the Policy places *“Emphasis in residential development proposals is placed on the provision of one-, two- and three- bedroom homes suitable for occupation by, for example, newly forming households, young couples, expanding families and older people looking to move to a smaller property”*.
- 2.21 Indeed, Topic Paper 1 (June 2022) acknowledges *“It is likely the through intensification, new residential development will likely be flats and there wouldn’t be a mix of housing types, including family homes”*.
- 2.22 Thus, there remains the outstanding questions in respect of Policy HOU3, and the wider spatial strategy as to how, where and when the Council can effectively, and sustainably, anticipate the delivery of family sized housing (i.e. 3 bedrooms and over).
- 2.23 The Local Plan is heavily reliant upon brownfield sources of supply to deliver, and the evidence prepared by and on behalf of EBC appears to recognise that, in the drive for the optimisation of development in urban areas, those sites are likely to deliver smaller housing sizes and typologies.

- 2.24 No evidence has been provided to the Examination in how the identified site allocations can contribute to, let alone meet, the Council's supposed required housing mix.
- 2.25 In our view, the essential question is whether the mix of sites, allows the housing mix to be achieved. The sites are generally small and in urban areas, yet HOU15 shows a third of homes should be 3 beds or larger.
- 2.26 As a result, it is considered that Policy HOU3, as demonstrated above is not positively prepared insofar as it has not been demonstrated, how or in what manner, the approach of the Plan can suitably and demonstrably meet the evidenced housing mix as set out in the 2016 SHMA, and how the proposed site allocations can effectively contribute through to the required housing mix.
- 2.27 Taylor Wimpey consider the failing of the Council to reasonably consider suitable alternatives as a means to meet the housing requirements needs of different groups in accordance with the Framework to result in the draft Local Plan being unsound and not positively prepared in this respect. Taylor Wimpey therefore recommend that the draft Local Plan take a balanced approach to its housing requirement, by allocating land on greenfield sites, and where appropriate, release land from the Green Belt, to facilitate healthy, balanced, and sustainable communities as envisaged by the Framework.

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