

Former Moore Place Golf Course

Hearing Statement – Matter 6: Affordable
Housing

ON BEHALF OF CHARTERHOUSE STRATEGIC LAND &

MOORE PLACE HOLDINGS

March 2024

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1. Introduction

- 1.1 These Hearing Statements have been prepared on behalf of our client, Charterhouse Strategic Land, in response to the Examination in Public of the submission version of the Elmbridge Local Plan 2037.
- 1.2 Charterhouse Strategic Land, in partnership with Moore Place Holdings LLP [the property owner], is promoting the former Moore Place Golf Course off Portsmouth Road, Esher, for residential development (hereafter referred to as the Site). A site location plan is included in **Appendix A**.
- 1.3 Our client, under Moore Place Holdings LLP, has previously submitted representations to Elmbridge Borough Council as part of the December 2016 Elmbridge Local Plan: Strategic Options Consultation (Regulation 18).
- 1.4 Representations were also submitted on behalf of Charterhouse Strategic Land as part of Elmbridge Borough Council's second Regulation 18 Options consultation which ran 19 August to 30 September 2019.
- 1.5 Further representations were submitted by Charterhouse Strategic Land in March 2020 in response to the Council's further Regulation 18 consultation document published January 2020, followed by representations to the Regulation 19 consultation of the Local Plan in July 2022.
- 1.6 Within these Hearing Statements, we have had regard to the documents sent to the Inspector after the submission of the Local Plan to the Secretary of State which were not available as part of the Regulation 19 consultation.

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

Q5.1 The evidence identifies an affordable housing need of 269dpa. HOU005 sets out that there is a backlog need for affordable housing of 1434 units. The Plan proposes to address this backlog 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 the need?

2.1 The proposal to address the backlog in 20 years does little to help those in need of affordable homes right now. In addition, the end of the Plan period is only 13 years away and does not address how these homes will be delivered both within the 13 remaining years of the Plan period or beyond that. With the Council proposing to deliver at levels significantly lower than the LHN, this situation is only likely to worsen. This does not represent a justified approach and is not effective at addressing the need.

Q5.2 What would be the affordable housing need if the backlog were to be addressed over the Plan Period?

2.2 To clear the backlog of affordable housing need of 1,434 dwellings across the Plan period, this would add an additional 89 dwellings per annum to the identified need of 269dpa. This results in a need of 358dpa.

Q5.3 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?

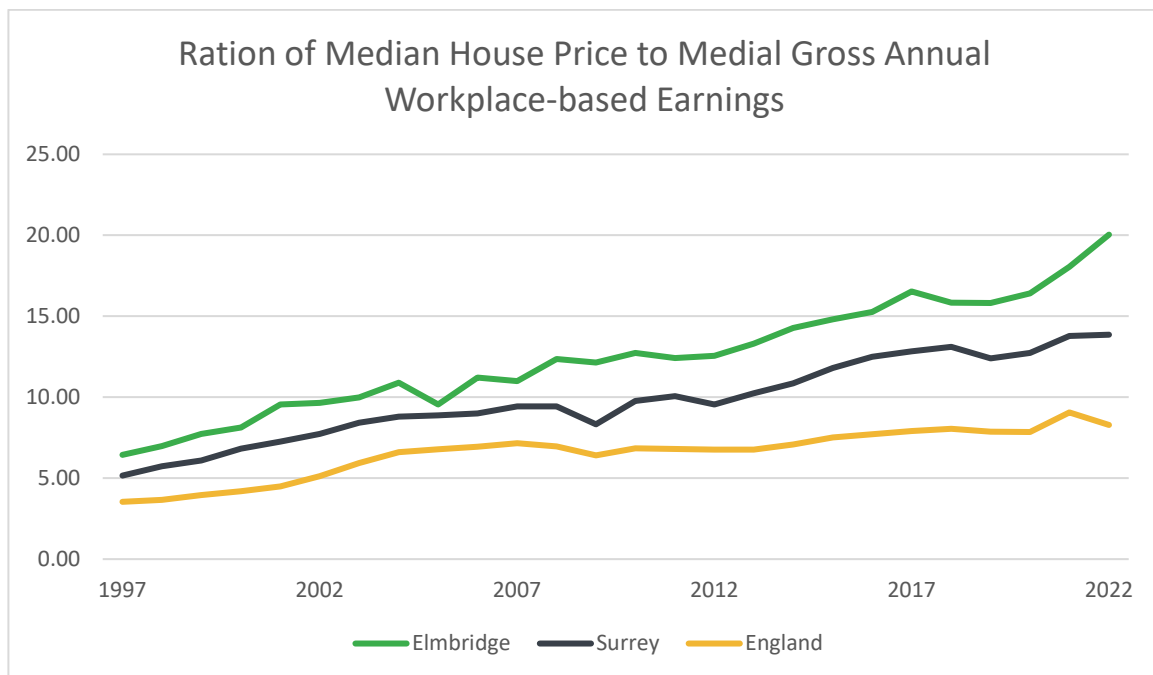
2.3 The Council has not considered a specific spatial strategy which would address the level of need for affordable homes. Of the spatial strategies considered by the Council, only one was above the LHN figure (Option 3). However, this was not specifically considered in relation to the level of affordable housing need and was calculated on the basis of all sites identified within the LAA 2018, all Green Belt parcels and promoted sites. In essence, it was a supply driven figure not a need based figure. Therefore, the Council has not adequately considered a reasonable alternative which would deliver the required number of affordable homes.

Q5.4 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?

2.4 The Council's chosen spatial strategy is likely to result in an increase in affordability ratios. As shown in the graph below, affordability ratios in Elmbridge are extortionately high (20.04 in March 2023) and are currently the fourth worst in the county¹.

1

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>



Q5.5 My initial letter (ID-001, notably paragraphs 11-17) raised some concerns and questions regarding the Council’s approach to affordable housing delivery. These concerns can be summarised as follows: The spatial strategy and the impact of this in terms of affordable housing delivery, with particular reference to the reliance on sites within existing urban areas as well as the requirement set out at policy HOU4 for affordable housing to be sought on sites which are not major development, which is contrary to paragraph 64 of the Framework. The Council have responded to these concerns through the preparation of a Topic Paper (TOP002). Having reviewed this document, the following questions arise:

- **Document TOP002 states that without the ability to collect affordable housing contributions on small sites, the ability of the Council to provide affordable homes will be highly restricted. However, the Statement on Affordable Housing provision on Small Sites (October 2021) states that between April 2011 to March 2021, there have been the delivery of 87 affordable homes over this 10 year period. This is less than 9dpa. The funding secured through the Section 106 Agreements has resulted in a total fund of £17.8m for this period. Are these figures correct? If these figures are correct, in what way does this demonstrate that the policy approach to collecting affordable housing payments on small sites is resulting in the delivery of affordable homes?**

2.5 It is widely considered that on-site delivery of affordable homes is preferable to off-site contributions. If the current strategy of delivering affordable homes through the payments into Enabling Fund has only resulted in 87 affordable dwellings being delivered in the past decade, it is impossible to understand how the Council intends to deliver anywhere near the required levels of affordable housing through this strategy.

2.6 With nearly half of the proposed allocations being delivered on small sites where an off-site contribution to affordable housing is sought rather than through on-site delivery, it is therefore critical to understand whether or not this approach is to be effective in addressing the severe affordable housing need in the borough. If these sites are to deliver off-site affordable housing, the question therefore remains as to where the Council will deliver these affordable homes given that the extent of Green Belt land in the borough. It is our position that this is not a justified or effective solution and cannot be found sound.

- **The evidence states that for the period 2011/2012-2021/2022, a total of 771 affordable units have been delivered across the Borough. The small sites contribution equates to 11% of this overall supply. In what way can this be described as an important component of the overall affordable housing supply?**

2.7 The current spatial strategy has failed to deliver a sufficient level of affordable housing: 11% historic delivery is well below the 30% proposed in the Plan. This poor delivery is in the context of the constraints of the borough (i.e. limited availability in urban areas and no Green Belt release). Therefore, it is unclear as to how this will change as a result of chosen spatial strategy in the emerging Plan and it is likely that affordable housing delivery will continue to be woefully low.

- **Paragraph 2.26 of document TOP002 states that policy HOU4 would result in the delivery of 1057 affordable housing units from years 1-15. Policy SS3 states that the Plan will deliver 6785 homes of which at least 30% will be affordable. How are the remaining 978 (minimum) affordable dwellings to be delivered and in what way will the Plan achieve this?**

2.8 The remaining 978 homes will clearly not be delivered based on the chosen spatial strategy. As evidenced above, there are severe concerns over the deliverability of many of the housing allocations and thus the spatial strategy cannot be considered sound.

- **Paragraph 2.27 of document TOP002 states that the financial contribution expected from small sites would be subject to a contribution methodology. However, this approach is not reflected in the policy wording. Indeed, paragraph 6.34 confirms that there should be no need for further viability assessments to be undertaken at the decision making stage. Is this a justified approach?**

2.9 This is not a justified approach as not allowing small sites to submit viability assessments, which often struggle to deliver affordable housing due to challenging site constraint, could result in these sites not being developed at all and no homes coming forward. This cannot be considered to be a justified approach.

- **Whilst the Council have confirmed that 98 of the proposed site allocations contained within the Plan are small sites, it is not possible to provide information concerning how many affordable dwellings the policy approach would deliver – is this correct? If this is correct how is this approach justified and effective?**

2.10 With almost half the allocated sites proposed as small sites, it is critical to understand how many affordable homes will be delivered. This lack of information demonstrates clearly the complete ineffectiveness of the policy and spatial strategy and the severe issues with the evidence base. This information should be made available for representors to have the opportunity to provide comments on.

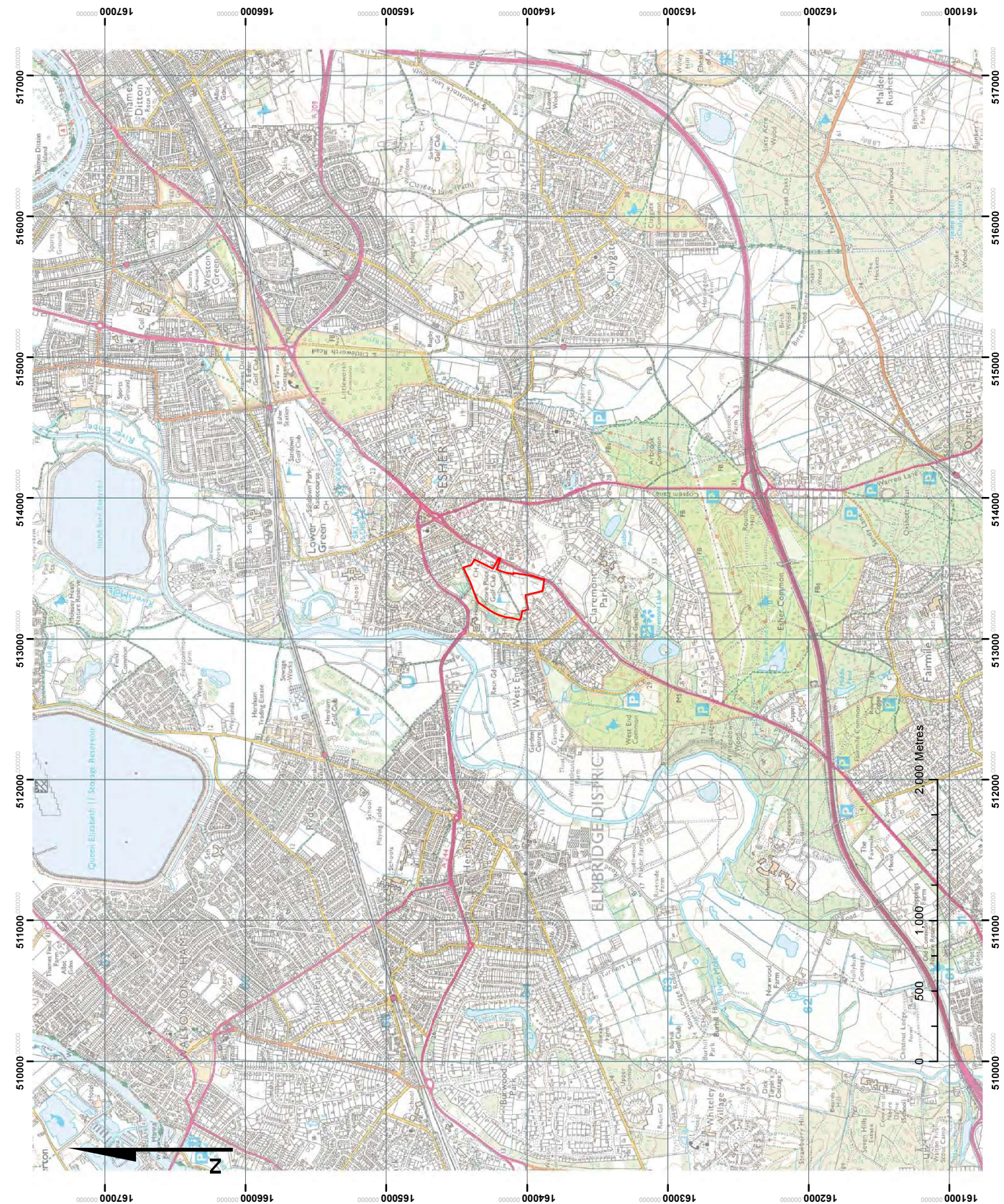
Q5.6 Given the Council's acceptance that one of the biggest opportunities the Council has to meet its affordable housing need is through the development of larger sites (paragraph 5.66 of Establishing Local Housing Need, May 2022) what are the implications of the Council's spatial strategy in terms of affordable housing delivery?

2.11 The Council has quite clearly not taken the opportunity to meet affordable housing need through the development of larger sites. The spatial strategy plainly takes the opposite approach. This will have a negative impact which will mean that not only will market housing not be delivered, pushing up house prices and making affordability worse, but will not meet the desperate need for affordable homes now.

Appendix A

Legend:

Site Boundary



DATE:	REVISIONS:	VERSION:	INITIALS:
LOCKHART GARRATT			
CELEBRATING 20 YEARS			
1998 - 2018			
TITLE: Site Location Plan			
PROJECT: Moore Place Golf Course			
CLIENT: Charterhouse Strategic Land Limited			
MAP REF: 4279/01/17-3345			
VERSION: v1			
DATE:	SCALE:	1:25,000@A3	
13/04/18	RF	PRODUCED BY: SM	
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