



ELMBRIDGE BOROUGH COUNCIL
EXAMINATION OF THE ELMBRIDGE LOCAL PLAN

MATTER 2: THE APPROACH TO HOUSING NEED

PRE-HEARING STATEMENT ON BEHALF OF
ELMBRIDGE BOROUGH COUNCIL

March 2024

Matter 2: The approach to housing need

Issue 4: Is the approach to calculating the level of housing need over the Plan period justified, effective and consistent with national policy?

Questions:

- 1.1 In establishing the amount of housing to be planned for, paragraph 61 of the Framework advises that strategic policies should be informed by a local housing needs (LHN) assessment, conducted using the standard method unless exceptional circumstances justify an alternative approach. The Council has followed this guidance and calculated the LNH to be a figure of 647 dpa or 9705 dwellings over the Plan period. Are there any exceptional circumstances which would justify and alternative approach?**

Council response

- 1.1.1 The Council has considered throughout the preparation of the Local Plan whether there are exceptional circumstances that would justify an alternative approach to the Standard Method. The Council has concluded, considering paragraph 61 of the NPPF and the PPG, that there are no exceptional circumstances that justify calculating the LHN through an alternative approach to the Government's Standard Method. As such the Council has produced the plan according to the Local Housing Need figure of 647 net new dwellings per annum, which was the Standard Methodology figure at the time of the Regulation 19 stage.
- 1.1.2 It is important to note however, that this figure is not 'fixed' and that throughout the preparation of the draft Local Plan this figure has evolved. Throughout the early stages of the preparation of the draft Local Plan, various housing need figures have been referred to at the Regulation 18 Stages (2016/17, 2019 and 2020), as a result of changing base date demographics and affordability ratio. Table 1 below sets out these figures.

Source	New homes per year
Kingston and North Surrey Strategic Housing Market Assessment (SHMA) 2016	474
Local Housing Need Assessment (LHNA) 2020 calculated using the standard method.	626
Local Housing Need Assessment (LHNA)	641

Source	New homes per year
2021 calculated using the standard method.	
Local Housing Need Figure 2022 calculated using the standard method.	647
Local Housing Need Figure 2023 calculated using the standard method.	650

Table 1: Housing need figures

- 1.1.3 The Council's consideration of whether there were exceptional circumstances to deviate from the use of the Standard Method is set out in detail in *Establishing Housing Need June 2022 [HOU001]*. The purpose of this paper is to set out how the LHN figure for Elmbridge has been established.
- 1.1.4 Whilst the NPPF refers to exceptional circumstances, Guidance in the PPG refers to exceptional local circumstances. The paper therefore considered that it was reasonable to consider the meaning of exceptional circumstances to be locally specific through either being uncommon across local authorities or uncommon in terms of scale of consequence.
- 1.1.5 The paper considered the arguments put forward through the various consultations on the Local Plan as potential exceptional circumstances. A key argument put forward was the use of the 2014 household projections which it was suggested were historic and that there is significant variation between the 2014, 2016 and 2018 projections. Whilst the Council does not disagree with the concerns raised by our residents and other stakeholders regarding the continued use of the 2014 household projections and has clearly set out its objection to their continued use in response to the Government's consultations on the proposed changes to the methodology, the Government continues to apply the use of the 2014-based household projections.
- 1.1.6 Nevertheless, whilst the council may not agree with elements of the standard method, this does not necessitate that exceptional circumstances exist nor that those matters advanced are either uncommon across local authorities or uncommon in terms of the scale of consequences.
- 1.1.7 In conclusion, the Council does not consider that exceptional circumstances exist to justify an alternative approach to the standard method in calculating LHN.

1.2 Paragraph 61 of the Framework goes on to states that in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Has the Council done this?

Council response

1.2.1 The Council has taken into account the unmet needs from neighbouring areas. Through the Duty to Cooperate process in relation to housing need, the Council has sought to understand whether any other authorities have unmet needs, in which case consideration must be given as to whether these needs could be met in Elmbridge. This engagement has been comprehensively recorded in the Duty to Co-operate Statement of Compliance (June 2022) [CD015], the Duty to Cooperate Statement of Compliance Appendices (June 2022) [CD016], the Duty to Cooperate Statement of Compliance Update (August 2023) [CD014] and the Statements of Common Ground (SoCG) signed with each Authority [documents CD018 to CD025].

1.2.2 The issue of objectively assessed housing need and unmet development needs arising from the Housing Market Area (HMA) and neighbouring local authority areas identified in the SoCG is summarised in the table below. Each of these authorities have reached varying stages in their Local Plan preparation.

Authority	Housing need evidence from neighbouring authorities
Royal Borough of Kingston	<ul style="list-style-type: none"> - Within the HMA - Meeting the London Plan Housing target of 9, 640 homes between 2019/20 and 2028/29.
Epsom & Ewell Borough Council	<ul style="list-style-type: none"> - Within the HMA - LHN 576 dwellings per annum (April 2022) - Estimated 56% of need can be met over the plan period
Mole Valley District Council	<ul style="list-style-type: none"> - Within the HMA - LHN 456 dwellings per annum - Estimated unmet need of circa 1,700 dwellings over its plan period
London Borough of Richmond upon Thames	<ul style="list-style-type: none"> - Not within the HMA - London Plan Housing target 411 dwellings per annum

Authority	Housing need evidence from neighbouring authorities
Spelthorne Borough Council	<ul style="list-style-type: none"> - Not within the HMA - LHN 618 dwellings per annum - Able to meet its own need
Runnymede Borough Council	<ul style="list-style-type: none"> - Not within the HMA - Adopted LP sets a minimum 7,507 dwellings provided across plan-period - Based on OAH
Woking Borough Council	<ul style="list-style-type: none"> - Not within the HMA - Core Strategy provision of 4,964 dwellings between 2010 and 2027.
Guildford Borough Council	<ul style="list-style-type: none"> - Not within HMA - Identified need (OAH) of 10,678 additional dwellings by 2034. - 14, 600 dwellings are allocated in the Local Plan

Table 2: Summary of housing need from SoCG with neighbouring authorities.

1.2.3 Since the SoCG have been signed the London Borough of Richmond has submitted its Local Plan for Examination. The submission version of the Local Plan confirms that the borough is planning to meet its housing need. The position at Spelthorne has also changed recently, with a letter sent to the Local Plan Inspector on 6 March 2024 (following decision made at the Environment and Sustainability Committee on 29 February 2024) requesting a modification to the Local Plan. These modifications included the removal of all Green belt allocations from the Local Plan with the exception of the two allocations to meet the need for Gypsy, Traveller and Travelling Showpeople, keep all proposed flood risk sites but remove those at high risk of flooding and move some high-risk sites to later in the Plan period (11-15 years) to allow for the River Thames Scheme to be operational and effective, the design code to be completed and subject to no resolute objection from the Environment Agency, and to withdraw the Staines Development Framework as a core document.

1.2.4 In considering the spatial strategy set out within the draft Local Plan, the Council has considered whether any or all of this potential unmet need could be accommodated within Elmbridge. Within Elmbridge meeting some or all of this need would almost certainly require significant Green Belt release. In the Options consultation in 2019 Option 3 considered the development of approximately 16,300 dwellings over the plan period. However, Option 3 scored many significant negative impacts in its

assessment within the sustainability work carried out and would undermine the aim and purposes of Green Belt. In addition, an initial assessment of the transport mitigation required was not considered to be deliverable. For these reasons, this option was not developed further as a reasonable alternative for the spatial strategy.

1.2.5 In its decision making on the Spatial Strategy for the Local Plan, the Council has considered the potential level of unmet need but has weighed this against the potential impacts accommodating additional growth over and above its own local housing need figure could have, and this is set out in detail in paragraphs 6.31 to 6.39 of Topic Paper 1 How the Strategy was formed [TOP001].

1.2.6 In summary, the Council considers that through the preparation of the Local Plan it has taken into account any needs that cannot be met within neighbouring areas.

1.3 A number of the Statements of Common Ground (SoCG) with neighbouring authorities have raised concerns regarding the intensity of housing need within Elmbridge and its wider housing market area, and the implications of the spatial strategy adopted which may exacerbate unmet need across the areas and place additional pressures on other areas. Is this a legitimate concern and are these concerns supported by evidence?

Council response

1.3.1 The Council acknowledges that there is unmet need arising from the Local Plan and at present it is unknown how this need could be met. There are a number of neighbouring authorities who are at the early stages of reviewing and/ or preparing their local plans. Whilst the Council is not expecting these boroughs to take our unmet need their maybe opportunities through their Local Plans for some unmet need to be met, and as part of DtC and the preparation of their Plans this will need to be considered in accordance with the NPPF.

1.3.2 Through these processes it will be for other Local Plan Inspectors to determine whether they can meet unmet need from Elmbridge, and for the individual Local Plan Authorities themselves to set out any reasons why they consider that they cannot meet a higher housing number.