



Elmbridge Borough Council

... bridging the communities ...

Civic Centre
High Street, Esher
Surrey KT10 9SD
01372 474474

contactus@elmbridge.gov.uk
elmbridge.gov.uk

Dominic Raab, MP
Ben Spencer MP
House of Commons
Via Email

contact:
Tel: (01372) 474474
e-mail: tplan@elmbridge.gov.uk
my ref:
your ref:

28 July 2020

Dear MPs Raab and Spencer

We completely understand how extraordinarily busy you both must be at this time. However, we were disappointed not to have the opportunity to speak to you personally about our concerns for the proposed changes to the standard methodology and recently published 2018 ONS Household growth figures have the potential to slow the progress of our Local Plan.

As you know, Elmbridge is currently preparing a draft Local Plan. Progress on this has been delayed by Covid-19 but we anticipate that a draft plan will come to Elmbridge Council's Cabinet and Council for approval before the end of the year. One of the key factors for Members, when agreeing a growth strategy for the Borough, will be the housing target derived from the standard methodology as set out in the NPPF. The PPG states that the housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities. This number should be kept under review and revised where appropriate.

To date, the Government has prevented LPAs from using the most up to date household and population projections because they were lower than those used in the initial calculations which were based on 2014 ONS household projections. However, with the recent release of the 2018 population and household projections, which confirm a downward trend in population growth, there is an expectation that Government will have to move away from its insistence on using the older, higher household projections from 2014. For Elmbridge, using the 2018 household projections would drop our assessed housing need from 623 per year to 440.

A change of this size could significantly alter the preferred spatial strategy for growth. We do not want to decide on a growth strategy for the Borough with such uncertainty over our housing need. It is therefore vital that the Government gives a clear and speedy decision on whether LPAs are to use the 2014 or 2018 household projections to prevent slippage in the Local Plan timetable. You will, I am sure, also be aware that a significant proportion of our

Chief Executive
Robert Moran

Strategic Director
Ray Lee

Strategic Director and Deputy Chief Executive
Sarah Selvanathan



local residents are well aware of the marked reduction in the number of households forecast for Elmbridge and are looking to the government to reflect this in the current review of the standard methodology.

In the course of the Government's review of the standard methodology as part of the planning reforms, we are aware that this may include changes that maintain the housing requirements, despite the lower household projections in areas like Elmbridge. We are concerned that the affordability ratio might be adjusted to help boost the housing targets to counteract the lower household projections. Any increase to the affordability ratio element of the standard methodology will dramatically increase our housing need. This would then require further investigation, causing a further delay to the Local Plan programme, and causing considerable concern to Elmbridge residents.

In order to deliver the local plan, we need clarification and certainty over the housing targets we are being asked to meet. As you will have seen in recent correspondence from the LGA in the Daily Telegraph, we would also like assurance that the LGA is being fully consulted on the implications of amending the standard methodology and that the consequences of increasing the affordability ratio for places like Elmbridge have been fully understood. The impact of Covid-19 on affordability also needs to be considered by the Government before altering the affordability rate to give artificially inflated assessed housing need figures.

Our three main concerns are:

- (i) The need for certainty and clarity on housing need to avoid any delay in progressing our Local Plan
- (ii) Surrey, and Elmbridge in particular, will be required to accept a greater assessed housing need through an increased affordability ratio to compensate for the 2019 lower household projections, in order to meet the overall national requirement of 300,000 homes.
- (iii) The impact of Covid-19 on housing need will not be reflected in any new methodology for assessing housing need.

Any representations you can make on our behalf to the Secretary of State and the MHCLG regarding these concerns would be very much appreciated.

Further, we would also like to point out that no response has been received to a jointly signed letter, sent to the Secretary of State, the Rt Hon Robert Jenrick on 27 January 2020. This letter concerned Elmbridge Council's predicament in relation to potentially having to consider releasing Green Belt or unreasonably increasing the densities of our urban areas in order to meet our housing numbers. This letter was signed by Cllr Stuart Selleck, Leader of Elmbridge Council, Cllr Andrew Davis, then Deputy Leader of the Council and Leader of the Liberal Democrats Group, Cllr Janet Turner, Leader of the Hinchley Wood Residents' Association and Cllr James Browne, Leader of the Conservative Group.

A further letter from Cllr Stuart Selleck, as Leader of the Council, was sent to the Secretary of State (and copied to both of you) on 20 May 2020 raising two issues: querying whether any changes to the NPPF are envisaged in the light of the Covid 19 pandemic and raising our concerns about guidance to councils around the Duty to Cooperate. This letter has also received no reply.

As you know, we were hoping to meet with you to discuss these issues before the publication of the planning reforms, including the review of the standard methodology, but it was not possible to find a mutually convenient time in your diaries before September. However, we look forward to meeting with both of you on 4 September.

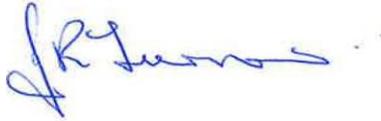
Yours sincerely



Cllr. Stuart Selleck
Leader of the Council



Cllr. Mary Marshall, Deputy
Leader, Portfolio Holder for
Environment



Cllr. Janet Turner
Leader, Hinchley Wood
and Weston Green RA
Group



Cllr. James Browne
Leader, Conservative
Group