Hearing Statement for Stellican Ltd

RUNNYMEDE 2030 LOCAL PLAN EXAMINATION HEARINGS STAGE 1

5 November 2018

Our Ref: HJOA/18-00239
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1 INTRODUCTION
1.1 This Hearing Statement has been prepared by Rapleys on behalf of Stellican Ltd. and covers the following matters for Stage 1 of the examination of the Runnymede 2030 Local Plan:

- Matter 1 - Legal Requirements, the Duty to Co-operate and the Plan Period;
- Matter 2 - Objectively Assessed Need for Housing and Employment;
- Matter 3 - Overall Spatial Strategy; and
- Matter 4 - Green Belt Boundaries and Exceptional Circumstances.

1.2 This statement follows representations submitted by Rapleys to both Regulation 19 consultations held earlier this year, and should be read in the context of these documents.

2 SUMMARY OF POINTS
2.1 The response to the Matters raised below are, in summary:

- The plan period should be extended to 2035.
- There is inadequate provision to meet housing needs, including student accommodation.
- The housing requirement should be uplifted from 7,629 to at least 13,480, and probably 18,840 dwellings.
- The student bedspace requirement should be uplifted from 3,389 to at least 4,769.
- Exceptional circumstances exist to release more land from the green belt
- More land should be released from the green belt at Englefield Green in general and at Sandylands Home Farm, Blays Lane in particular.

In more detail:

Matter 1
- The Sustainability Appraisal is not adequate and the Plan has not been tested against all reasonable alternatives.
- Runnymede has failed in its duty to co-operate.
- The Plan period is not justified, and should be changed to 2015-2035.

Matter 2
- The 2015 and 2018 SHMAs are not an appropriate starting point for setting the housing requirements for the Plan, not least as the latter document does not cover the whole HMA, does not take full account of the affordable housing need, and it fails to account properly for the student population (either existing or anticipated growth).
- Key matters are not adequately considered or justified, not least in terms of affordable housing (as the OAN would only result in approximately 38% of identified affordable housing need being met) and student accommodation (particularly given the existing level of studentification in the local authority area).
- The housing requirement in the Plan needs to be significantly higher, and more sites need to be allocated for housing and student accommodation (the latter particularly in Englefield Green) to meet the need.

Matter 3
- The overall spatial strategy is supported in broad terms, but significant concerns arise.
- In particular, the approach to housing and student accommodation in Englefield Green is unsound, and more land needs to be allocated for housing and student accommodation in the settlement.
Matter 4
• The plans approach to the Green Belt is unsustainable, and will result in development pressure to release land from the Green Belt during the plan period.
• As such, further sites should be identified for development, and as such released from the Green Belt, within the Plan.
3 MATTER 1: LEGAL REQUIREMENTS, THE DUTY TO CO-OPERATE AND THE PLAN PERIOD

1.2 Is the Habitats Regulation Assessment and the Sustainability Appraisal (SA) adequate? Does the SA demonstrate that the Plan has been tested against all reasonable alternatives?

3.1 Comment on the Sustainability Appraisal was made by Rapleys in representations to the Regulation 19 consultation in June. These points still stand. Namely:

- Alternative sites have not been reassessed since the first Regulation 19 consultation in February, despite an addendum to the Sustainability Appraisal being published. The sites have not been assessed consistently as against the relevant criteria. The Plan is not meeting its objective need for housing (even if one was to accept the LPA’s assessment of housing need), and the Council has not investigated properly alternative sites, (such as the Sandylands site) that can contribute to this shortfall;
- Further evidence to take into account the Heathrow expansion has not been prepared. The expansion is likely to increase need for housing further, and a quantitative assessment of this impact should be undertaken.

1.4 Has the Council engaged constructively, actively and on an on-going basis with all relevant organisations on the strategic matters that are relevant to the Plan’s preparation, as required by the Duty to Cooperate?

3.2 The local authority issued a scoping report in October 2015 (“Meeting the Duty to Cooperate”). This document sought (i) to identify the housing needs within the HMA (defined as Runnymede and Spelthorne local authority areas) over the period to 2035, (ii) to meet those needs within the HMA or beyond and (iii) to properly understand the implications of an inability to do that.

3.3 A joint SHMA was issued relative to the Spelthorne/Runnymede HMA in November 2015, providing a strategic assessment of OAN in the two local authority areas up to 2035, in line with the scoping report.

3.4 However, since then there has been no proper or meaningful constructive engagement by the Council in its preparation of the Runnymede Local Plan on the strategic matter of housing provision within the Spelthorne/Runnymede HMA. In particular the Council has unilaterally reduced the plan period from the 20 years to 15 years, with the plan period now ending in 2030.

3.5 Further, it has carried out an update of the SHMA in January 2018 for its part of the HMA without the input of Spelthorne, and without identifying the needs of Spelthorne, let alone exploring the relationship between the needs of the two local authority areas, or the impact the reduction in the plan period has on the ability to meet housing need in the HMA and beyond.

3.6 Moreover the Duty to Co-operate Compliance Statement which appends the Statement of Common Ground between Runnymede BC and Spelthorne BC, dated May 2018, indicates the use of a different period (2018-2033) and methodology for the assessment of housing need within the Spelthorne part of the HMA, with a much reduced housing requirement per annum for that part of the HMA. This assessment of need is contrary to the jointly commissioned SHMA the need for which is referenced in the duty to co-operate scoping framework.

3.7 Further, even on this altered basis it appears that, for the period 2018 to 2033, Spelthorne cannot meet its needs (428 as against a need of 590 dpa). This indicates that there will be a
shortfall within the HMA as a whole which has not been addressed or engaged with in any meaningful way through the duty to co-operate. Spelthorne are currently undertaking work which may or may not increase its ability to deliver houses, which was intended to be complete by September 2018, only 2 months after submission of this plan. Although this appears, in the event, not to have taken place, it is understood that this was not known when the plan was submitted, and as such submission should have awaited the outcome of that process.

3.8 Presently the appropriate assessment period and level of housing requirement within the HMA is uncertain as is the level of supply and this is due to unilateral actions of Runnymede BC and its failure to engage in any effective or meaningful way on these matters with Spelthorne BC or any other adjoining authorities.

3.9 In this context, the Plan was submitted when the duty to co-operate had not been fulfilled. As it was not fulfilled at the point of submission it cannot be subsequently remedied as the plan is intrinsically flawed and must be withdrawn.

3.10 Moreover Runnymede has also failed in its duty to co-operate in relation to Woking BC with which it is recognised Runnymede has strong links. A Statement of Common Ground between both authorities agrees a commitment to work together to address, inter alia, housing shortfall;

- Woking has an unmet need of 650 houses;
- Runnymede have not sought to address this unmet need, and have issued a statement in which they consider the offer of assistance to Woking ‘inappropriate’.

3.11 Woking has a need of 517 dwellings per annum (dpa); their Core Strategy provides for 292dpa. This leaves an unmet need of 3,150 total dwellings up to the end of the plan period in 2027:

- Waverley’s Local Plan takes up 1,660 units from Woking’s unmet need. It was adopted in February 2018 but has been legally challenged; and
- Guildford’s Local Plan takes up 840 units from Woking’s unmet need. A Major Modifications consultation ran September to October of this year; therefore
- At least 650 units are not being met within Woking’s HMA.

3.12 Runnymede and Woking Borough Councils signed a Statement of Common Ground 19 May 2018 which states:

_Runnymede and Woking are also committed to working together under the Duty to Co-operate to address strategic housing matters of cross boundary significance where they could not be addressed within their respective Housing Market Areas, paying particular attention to local connections. This could relate to circumstances where there is either an undersupply or oversupply of housing in either HMAs._

3.13 It is not clear what discussions followed the Statement of Common Ground. Runnymede wrote to Woking Borough Council in a letter dated 17 October 2018. It states:

_In light of Woking’s decision that no additional evidence is needed to seek to meet housing need within its own boundary, and noting that the Local Plans of Waverley, Guildford and our own Plan in Runnymede have reached a mature stage we would wish to make clear that for these reasons set out in this letter, Runnymede Borough Council feels that it is inappropriate to offer assistance to meet any unmet needs from Woking until such a time that Woking Borough Council has identified that it has turned every stone in meeting its identified housing needs._
In May 2018 (when the Statement of Common Ground was signed) Waverley’s Plan had been adopted and Guildford’s Plan was under examination. Shortly afterwards Runnymede commenced a second round of consultation on their Local Plan. The Plans were at a ‘mature stage’ when the Statement of Common Ground was agreed. It is unclear why this may now be used as reason to justify Runnymede’s refusal to co-operate.

This change in position (seemingly without a change in context) would strongly suggest that Runnymede has not followed their Statement of Common Ground with ongoing and constructive engagement.

1.5 Is the Plan period (2015-2030) justified? If not, how should this be rectified?

The Plan period is too short. It is not justified, and should be extended to the originally proposed plan period of 2015-2035. Paragraph 157 of the 2012 NPPF states:

Crucially, Local Plans should be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date.

The point from which this 15-year period is measured is clarified in paragraph 22 of the 2018 NPPF. It commences from the date of adoption:

Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities.

The Plan period was originally 2015 to 2035. Its reduction to 2015-30 does not accord with the requirements of the NPPF (it will - at the earliest - be adopted in 2019, which will give it an time horizon of only 11 years). This cannot be justified and is not sound. The original timescale 2015-35 should be used.
MATTER 2: OBJECTIVELY ASSESSED NEED FOR HOUSING AND EMPLOYMENT

2.1 Does the objectively assessed housing needs figure of 7,507 dwellings (2015-2030) (500dpa) form a justified, positively prepared basis for setting the Plan’s housing requirement figure? In particular:

4.1 The figure of 7,507 is not a justified, positively prepared basis for establishing the Plan’s housing requirement. The reasons for this are set out in our earlier representations, and may be summarised as follows:

- The 2015 SHMA and 2018 update do not form an appropriate starting point for setting Runnymede’s housing requirement;
- The fact that Spelthorne has not requested an update to the 2015 SHMA gives rise to substantive difficulties in considering the evidence base for Runnymede’s OAN figure; and
- The demographic assumptions that the 2018 update makes are subject to challenge and the report does not present justified conclusions.

These are points are dealt with below in turn.

a) Taken together, are the Runnymede-Spelthorne Strategic Housing Market Assessment (SHMA) 2015 and the 2018 Partial Update an appropriate starting point for setting the housing requirement for Runnymede?

4.2 The two documents are not - when taken together - an appropriate starting point for establishing Runnymede’s housing requirement.

4.3 Although the 2015 SHMA covers the whole HMA, the 2018 Partial Update unilaterally considers Runnymede in isolation, and covers a shorter period of time. Further, the Statement of Common Ground between Runnymede and Spelthorne confirms that the latter authority has abandoned the 2015 document as its evidence base.

4.4 Further, the housing figure does not take sufficient, let alone, full account of the affordable housing need, and it fails to make appropriate provision for the student population (either existing or anticipated growth). The delivery of affordable units over the Plan period, in only meeting 38% of the need over the proposed 15 year period, will fall far short of what is needed and should be provided.

4.5 Therefore, and alongside concerns such as those detailed below, the two reports are not an appropriate starting point for setting the housing requirement for Runnymede, either together or in isolation.

b) Does the fact that an update of the SHMA 2015 has not been requested by Spelthorne Borough Council at this time give rise to any substantive difficulty in considering the evidence base for Runnymede’s OAN figure?

4.6 Runnymede is primarily relying on its 2018 SHMA, which unilaterally provides an OAN derived without any evidence that the housing needs of the rest of the HMA, or wider area, have been considered.

4.7 The Statement of Common Ground between Runnymede and Spelthorne indicates that Spelthorne is advancing its Local Plan without reference to the 2015 SHMA, but is rather basing it on other methodology, over a different timeframe.

4.8 In this respect, Spelthorne and Runnymede are evidently out of step relative to their collective assessment of housing need in the HMA and this, combined with the shortcomings
of the 2018 SHMA (relative to its scope and findings), render the evidence base for Runnymede’s OAN figure unsound.

c) Are the demographic assumptions (including future trends in household formation and migration), the account taken of affordability and market signals, forecast growth in employment, commuting patterns, the need for affordable housing, the role of students in the local housing market, the potential impact of Heathrow expansion, Brexit and any other relevant factors adequately considered, and are the conclusions justified?

4.9 There is a wholly inadequate consideration of affordability and market signals; the need for affordable housing; and the role of students in the local housing market in reaching the plan’s housing requirement figure of 7,507. Of the items listed in the question, several have been inadequately considered, and the conclusion that is drawn is not justified with regard to the evidence by which it is informed. The most relevant areas – as they relate to the 2018 Partial Update - are dealt with below, and follow on from our earlier representations.

Affordability

4.10 Affordability in the area is acute, and worsening. The 2018 SHMA indicates that lower quartile house prices are 12 times earnings. There is an overwhelming, compelling and acute need for affordable housing provision in the plan period.

4.11 As covered in our representations to the first Regulation 19 consultation in February, the SHMA states a need of 471 dwellings per annum over the period 2013-2036. In the context of an overall policy target of 7,629 over the plan period, equating to 509 units per year, and assuming that all sites deliver the upper policy target for affordable housing (35%), this would deliver in Runnymede would deliver - at most - 178 affordable dwellings per year. This represents 38% of the need for affordable housing identified in the SHMA.

4.12 The SHMA recommends that this be reconciled within the 20% uplift for market signals. However, this is not supported, as it is insufficient, and a further uplift to the OAN both through a higher percentage for market signals and an additional element for affordable housing is essential to ensure a more meaningful contribution towards affordable housing need is made in the plan period. Students

4.13 Demographic assumptions relative to the roles of students in the local housing market have not been adequately considered, and the conclusions (and resulting policies) are totally unjustified.

Student Accommodation

4.14 Much of the background to this issue has been addressed with in detail in Rapleys’ representation to the Regulation 19 consultation in February, in particular the report on Student Accommodation in Runnymede provided by ORS, August 2018, included at Appendix 2 of that representation.

4.15 In the first instance, it must be noted that Runnymede has been undergoing substantial studentification over the last 20 years. Between 2001 and 2011 alone there was an increase in student households from 326 to 671 homes in the Borough, more than doubling open market housing being used for this purpose.

4.16 This situation is particularly acute in Englefield Green, as a result of its proximity to Royal Holloway University of London “RHUL”. Of the 671 student households in the Borough in 2011, 246 were in Englefield Green West, and 110 in Englefield Green East - a total of 356,
more than half the total number in the Borough. As a result, in these wards 47.3% and 32.7% of private rented sector houses (respectively) are student households.

4.17 Given the substantial housing shortage and issues with affordability in Runnymede, ideally all student households should be accommodated in specialist student housing. Assuming 4 students per dwelling, on the 2011 data this would equate to 2,684 student bedspaces to rectify the existing situation.

4.18 Even if, as identified in the ORS study, a return to the 2001 position was sought, and the 345 student households were accommodated in specialist student housing, this would equate to a need for 1,380 student bedspaces.

4.19 This position is confirmed in tabular form below:

<table>
<thead>
<tr>
<th></th>
<th>2001</th>
<th>2011</th>
<th>Increase between 2001 and 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of residential units occupied by students</td>
<td>326</td>
<td>671</td>
<td>345</td>
</tr>
<tr>
<td>Equivalent by bedspace¹</td>
<td>1,304</td>
<td>2,684</td>
<td>1,380</td>
</tr>
</tbody>
</table>

1. Assuming an average of 4 students per dwelling

4.20 The demographic assumptions, and the resulting policies in the Local Plan do not take the existing situation into account and most certainly do not address it. As a minimum, the Plan should seek to return the number of residential units in the Borough to 2001 levels.

4.21 Further, the situation is likely to be substantially exacerbated during the plan period. RHUL is looking to increase the number of students by 3,400, and on-campus bedspaces by 2,650 up to 2031. The OAN, and the resulting Local Plan as proposed, relies on RHUL increasing its bed-spaces in tandem to its proposed student number growth, as planned up until 2031, to ensure that the existing situation does not worsen. It therefore does nothing to redress the current deficit in purpose built student bedspaces in specific areas that are affected, in particular Englefield Green, an area that is already heavily studentified. The plan also does not recognise the fact that many second and third year students prefer to live off-campus, and will inevitably move into private rented houses and thereby exacerbate, still further, studentification. Further, given it appears highly likely that on-campus bed-spaces will not be delivered by RHUL as intended, the assumptions relative to this matter are not justified. Consequently, the Plan seeks to do nothing to mitigate the existing studentification issue in the area, and the approach to future growth will merely exacerbate this. The plan is simply not sound given its failure to adequately address student housing provision.

Heathrow Expansion

4.22 This is not considered within the assessment, a consequence of which is the potential under-estimation of the housing requirement over the Plan period - attention was drawn to this in our representations to the second Regulation 19 consultation. The SHMA should be revised to take account of the Heathrow Expansion.
2.3 If the Plan is unlikely to meet the identified needs within the relevant time period, how should this be addressed?

4.23 The Plan is highly unlikely to meet identified needs (see above and below). This should be addressed through an extension of the plan period to 2035, an uplift to the housing requirement and the allocation of more land in order to meet the identified needs for housing and student accommodation.

4.24 In terms of quantifying the uplift to the housing requirement, an extension of the plan period to 2035 would require an additional 2,500 units to be added to the figure of 7,507 resulting in a figure of 10,007 units even assuming that the current OAN per annum figure is correct, which it is not. As explained above this requirement figure needs to be further uplifted to take account adequately of market signals and to provide an appropriate contribution to affordable housing need over the plan period. There is an element of judgement to be applied in deciding on this uplift to properly address market signals and to provide for affordable housing need, however it is evident that a plan that only delivers 38% of a local authority’s affordable housing need is not positively prepared, nor reflects the NPPF’s commitment to meeting the housing needs of all of Runnymede’s community including those in need of affordable housing.

4.25 In order to deliver a higher level of affordable housing, a more reasonable position would be to plan to meet the needs of at least 50% of the need and potentially up to at least 70% of the need. This would equate to a housing target of between 673 to 942 dpa. Therefore if the plan period is extended to 2035 the housing requirement overall should be uplifted to between 13,460 to 18,840 dwellings.

4.26 To help alleviate the pressure on housing (both existing, and during the plan period), the Plan should also target additional student bedspaces to ensure that, as a minimum, studentification in the area should be reduced to 2001 levels. As such, the target for student bedspaces within the plan should be at least 4,769 as a bare minimum (although ideally, it should be higher than this to improve on the 2001 situation).

4.27 In representations to both Regulation 19 consultations (February and June 2018), Rapleys put forward land at Sandylands Home Farm East, Blays Lane, Englefield Green as a site that should be allocated to contribute to the local authority’s development needs over the Plan period. The site should be allocated in the Plan in order to help meet housing need, either through the provision of 200 residential units or 750 student bedspaces.
MATTER 3: OVERALL SPATIAL STRATEGY

3.1 Is the Plan’s overall framework for the roles that will be played by various parts of the Borough in meeting development needs and protecting and, where possible, enhancing the environment sound? In particular:

a) Is the broad apportionment of housing, economic and other development to the various centres and locations throughout the Borough consistent with the Plan’s spatial vision and objectives?

5.1 Although, in general terms, the spatial strategy is supported, in particular the identification of Englefield Green as a second tier settlement, below the larger towns, but nevertheless suitable for major new development. However, some significant concerns remain, and the Plan is not sound as currently drafted.

5.2 The broad apportionment of development is set out, in headline form, within Policy SD2. This policy provides a list of settlements, with an indication of the development that is envisaged within them, with no further context in terms of the role of each centre performed within the Borough, nor adequately recognise their position in a hierarchy.

5.3 Further, the apportionment of housing (including student housing), as it relates to Englefield Green, is not consistent with the Plan’s spatial vision and objectives as it:

- does not allocate enough land for housing; and
- does not allocate enough land for student housing.

Allocation of Housing Land

5.4 In Englefield Green, the Local Plan (as modified) targets 494 net additional dwellings, including 145 completions and 93 dwellings deriving from the provision of C2 older accommodation. This is an increase from 456 dwellings in the previous draft (which was split into two figures, 365 dwellings and 91 dwellings deriving from the provision of C2 older accommodation).

5.5 It is not clear as to how the uplift was calculated, but even if the “completions” and C2 units are removed from consideration on the basis that they have already been provided, 256 additional units are planned for Englefield Green. However, the only allocation of land for housing in Englefield Green is Blays House on the land to the east of Blays Lane (adjacent to the site), for 100 units. As such, even in this “best case scenario, and on the basis of the wholly inadequate housing requirement figure, the Plan makes not provision as to how the additional 156 homes (just over 60% of the target) in Englefield Green are to be accommodated. Indeed it appears to be based on the assumption that this level of housing will come forward on unidentified sites. Given the size of Englefield Green, and the constraints on its growth without further alterations to the Green Belt, this is very likely to be undeliverable and as such renders the Plan unsound. As such, further land in Englefield Green needs to be allocated for housing. Given the acceptance that exceptional circumstances exist to justify green belt release together with the recognition that Englefield Green is an appropriate location for major additional housing it is clear appropriate that the spatial strategy recognises this and provides for additional release of land in the green belt at Englefield Green to meet affordable, market and student housing needs.

Student Housing

5.6 As set out in detail previously in these representations, and in the ORS report attached to previous representations, Englefield Green is already extensively studentified, with
between a third and a half of private rented dwellings occupied by students. This is not reflected in the 2018 SHMA, nor in the Plan.

5.7 Further, the plan reflects 3,389 student bedspaces of which 3,211 student bedspaces are anticipated to be provided in Englefield Green. This level of provision is supported. However, no land is allocated for student development in the settlement, and the target has only existed since May; although it is accepted that some projects may be in the pipeline, there is no certainty that supply will get anywhere close to demand, and there is no policy which provides for any of this.

5.8 As reviewed in previous representations, the SHMA’s treatment of student need is unsatisfactory. However, the SHMA is clear about what it considers to be the potential impact of student growth on the local housing market:

*The growth in Students at RHUL will not impact the housing market unless there is a failure to deliver the planned level of purpose built student accommodation.*

5.9 It is almost inevitable that there will be in fact a failure to make such provision, as set out in the table below:

**Table 2 - Borough-wide Shortfall in Student Bedspaces against potential supply**

<table>
<thead>
<tr>
<th></th>
<th>Best-case Scenario (all identified sites built-out)</th>
<th>Worst-case Scenario (completed or sites under construction only)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Need</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Baseline need, to reduce studentification to 2001 levels</td>
<td>1,380</td>
<td>1,380</td>
</tr>
<tr>
<td>Growth envisaged within Local Plan</td>
<td>3,389</td>
<td>3,389</td>
</tr>
<tr>
<td><strong>Total Demand</strong></td>
<td><strong>4,769</strong></td>
<td><strong>4,769</strong></td>
</tr>
<tr>
<td><strong>Supply</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Brunel University (as amended, and under construction)</td>
<td>472</td>
<td>472</td>
</tr>
<tr>
<td>71 Egham Hill (the PAD)</td>
<td>178</td>
<td>178</td>
</tr>
<tr>
<td>Royal Holloway (consented 2015, built out)</td>
<td>621</td>
<td>621</td>
</tr>
<tr>
<td>Royal Holloway (consented 2015, no reserved matters submitted)</td>
<td>2,029</td>
<td></td>
</tr>
<tr>
<td>Egham Gateway West</td>
<td>77</td>
<td></td>
</tr>
<tr>
<td>40-44 High Street, Egham (pending application)</td>
<td>80</td>
<td></td>
</tr>
</tbody>
</table>
The Plan makes no provision to ensure that the recognised and required level of purpose built student accommodation can, or will, be built. Even in the best case scenario, where all projects currently being considered are built-out as currently intended, there would be a deficit of 1,043 bedspaces, and 261 private dwellings would be unavailable to meet local housing need. In the worst case, there would be a deficit of 3,498, and 875 private dwellings would be unavailable, which is more than 10% of the Borough’s target for housing up to 2030.

Further, many second or third year students do not wish to live in on-campus student accommodation. In this context, the lack of allocation of off-campus student housing evidently conflicts with the Plan’s objectives to meet (its stated) housing targets.

Finally, no allowance is made for housing the staff that will be required as a result of RHUL’s expansion, which is estimated to be 380 in number. This not only undermines the approach to student housing generally, but also exacerbates the position relative to housing need.

In this respect, and although the apportionment of student housing to Englefield Green is supported, it is too small, and does not seek to address existing studentification in the settlement. Further, it is highly unlikely that the delivery of the bedspaces will take place to the extent required, and will instead be displaced in large part onto existing or planned market housing in Englefield Green either further displacing existing non-student residents and worsening housing supply and affordability, or by putting pressure on the Green Belt or, most likely, both. This is in clear conflict with the plan’s spatial vision and objectives.

b) Is it based on robust evidence, consistent with national planning policy, and is it deliverable?

The overall spatial strategy is not based on evidence, consistent with national planning policy and it is not deliverable, not least for the following reasons:
Evidence

5.15 The robustness of the evidence base supporting the overall housing targets within the overall spatial strategy is discussed earlier in this statement relative to Matter 2 but, essentially, the strategy does not plan for enough housing, particularly in the context of affordability and affordable housing and the need for student provision.

5.16 Further, and as discussed earlier in these representations, there appears to be little evidence that even the number of homes presently envisaged in Englefield Green can be accommodated, given the nature of the settlement, and lack of housing allocations, let alone the actual level of housing the plan should be making provision for. In addition, there is no evidence to support the Plan’s reliance on accommodating the level of student housing proposed in Englefield Green at the University.

National Planning Policy

5.17 Given the importance placed within the NPPF for local plans to meet the need for housing and other types of development for all sections of the community, for similar reasons to those set out in the previous section, the Plan is not consistent with National Planning Policy.

Deliverability

The overall spatial strategy, as it relates to Englefield Green, is not deliverable, not least as:

- In terms of housing, it relies on unidentified sites to deliver at least 156 new dwellings, over 60% of the target, and
- In terms of student housing, the accommodation of all student housing in the manner envisaged is very unlikely to take place as planned.

The consequence of both matters is that development pressure will not be able to be met, and this will put further pressure on local housing conditions and the Green Belt.
MATTER 4: GREEN BELT BOUNDARIES AND EXCEPTIONAL CIRCUMSTANCES

4.2 Having regard to the proposed releases of land from the Green Belt, does the Plan promote sustainable patterns of development?

6.1 The Plan does not propose sufficient release of land in order to meet the anticipated future need of the borough. The release of land does not promote sustainable patterns of development by virtue of the fact that insufficient supply will generate increasing pressure to develop land that has not been identified or allocated as part of the plan-making process.

6.2 The fundamental purpose of Green Belt release is to provide enough land to ensure that the security of remaining Green Belt land is guaranteed beyond doubt for the full duration of the Plan period. The proposed release of Green Belt land in the draft Local Plan does not accomplish this goal, and risks unsustainable patterns of development. Pressure will grow to increase the local housing supply, and with it greater risk that Green Belt is developed outside the planning process.

4.3 Are there adequate reasons in this case for not identifying safeguarded land as part of the Green Belt review? Are the consequences for the permanence of the Green Belt boundaries acceptable?

6.3 The plan makes inadequate release of land from the green belt. As stated at NPPF Para 83 it is at the time of Local Plan preparation and review that Local Authorities “...should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.” NPPF Para 85 third bullet point then indicates that Local Authorities should: “where necessary, identify in their plans areas of safeguarded land...in order to meet longer term development needs stretching well beyond the planned period.” Whilst the plan makes inadequate provision for beyond the plan period, particularly in light of the shortened plan period to 2030, by not safeguarding land in the green belt land for beyond it, it also makes inadequate provision for green belt release for the period up to 2030.

6.4 Given that this Local Plan review is already having to identify land for release from the Green Belt, there can be no realistic expectation that without, in addition, more land being released from the green belt that the Council will be able to meet its existing and future development needs “stretching well beyond the plan period”.

6.5 The Council have not identified sufficient land for development allocations outside the Green Belt so as to justify the lack of green belt release. By not identifying such land for release now the expected permanence of the Green Belt will be undermined as there will be likely to arise additional pressure on Green Belt land and with the potential for exceptional circumstances to justify alterations in the Green Belt boundary that would not otherwise be required.

6.6 The consequences of not identifying adequate green belt releases are damaging for the likely permanence of the Green Belt boundaries and additional sites should therefore be identified in accordance with the NPPF Guidance.
4.4 Does the proposed release of land from the Green Belt take adequate account of the effects on broader purposes that it may serve e.g. provision for outdoor sports and recreation, access to the countryside, protection and enhancement of landscapes, visual amenity and biodiversity?

6.7 The Runnymede Borough Council Green Belt Review (Part 2 Report, 24th March 2017) sets out the factors taken into account in identifying land parcels for further Green Belt assessment. The identified factors (Table 2.1 of the Green Belt Review Part 2) do not include broader site attributes or potential beyond the main Green Belt purposes - so as to include consideration of such matters as outdoor sport and recreation, access to the countryside, landscape value, visual amenity and biodiversity.

6.8 The assessment of sites and recommended areas were progressed within the Green Belt review under four main categories, namely:

- Weaker performing sub-areas/clusters
- Strategically less important sub-areas/clusters
- Weakly performing or strategically less important sub-areas with need for mitigation
- Sub-areas with scope for further subdivision (Review Table 4.1).

6.9 Arguably it is not the role of a Green Belt review to consider additional site attributes, opportunities or needs that a site may possess, given that the fundamental aim of Green Belt policy is to prevent urban sprawl (by keeping land permanently open) and that the essential characteristics of Green Belts are their openness and their permanence.

6.10 On an individual, site-by-site basis therefore, the identified sub-areas still need to have an assessment made of sustainability considerations and other attributes before being confirmed for release from the Green Belt or being promoted for any particular form of development.