Examination of the Runnymede 2030 Local Plan

Stage 1 Hearings – November 2018

Representations on behalf of Goldcrest Land – Representor No.1960

The Inspector has raised four main issues in connection with the opening hearings sessions, each with a number of related questions, in connection with these examination hearings. Where relevant we address each of these as supplementary evidence to that submitted at the Submission stage of the draft plan.

Matter 2: Objectively assessed need for housing and employment land provision

At para 2.1 the inspector asks:

*Does the objectively assessed housing needs figure of 7507 dwellings (2015-2030) (500dpa) form a justified, positively prepared basis for setting the Plan’s housing requirement figure?*

We note that an examination of the detailed housing policies is expected through Stage 2 of the Hearing timetable.

We do not consider that the Plan is positively prepared as it is the case that the proposed housing figure fails to accurately reflect the need for housing in Runnymede. The Strategic Housing Market Assessment – Update – January 2018 deals with a slightly different period when dealing with housing need. It addresses a time period of 2016-30, so starting a year later than the overall plan period.

In the conclusions paragraph 9.36 it states, “GL Hearn therefore concludes that the OAN for Runnymede is 498 dpa over the 2016-30 period.” However, this is lower than the top end of the range in the 2015 SHMA (a year that would be consistent with the plan period) at 535dpa. Also, as stated in paragraph 9.38 “It should however be noted that this level of growth is around 60 homes per annum lower than the figure proposed by the new standardised methodology for calculating housing need (557 dpa)”.

Accordingly, in order that the Council are not required to undertake an early review of the Local Plan the plan should be consistent in respect of its timeframes and make provision
for a higher number of housing units. This in itself would also be likely to deliver more affordable housing.

All of this suggests that the plan is making an underprovision for housing numbers. Application of either of the higher numbers above would suggest that the Council should be making provision for over 8,000 housing units during the plan period.

At para 2.1 the inspector asks:

   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?

Spelthorne Council has recently advised that they will further delay the next stage of their local plan. The next round of consultation on their draft plan will not now take place until Summer 2019. Therefore, any request by Spelthorne for an update of their part of the 2015 SHMA will not happen until 2019 at the earliest and so the two parts of the SHAA will be significantly out of synchronisation.

At para 2.1 the inspector asks:

   d) What are the implications for the Plan of the 2016-based household projections, published in September 2018?

The Government on 26th October 2018 published a ‘Technical consultation on updates to national planning policy and guidance’. The consultation page states “The publication of new household projections by the Office for National Statistics has led to a significant reduction in the overall numbers generated by the standard method for assessing local housing need.

This consultation sets out proposals to update planning practice guidance on housing need assessment to be consistent with increasing housing supply”. Further paragraph 5 of the consultation document states “The recent household projections release, published by the Office of National Statistic (ONS), has led some areas to reconsider the number of homes they were planning for. However, as the ONS has confirmed, lower household projections do not mean fewer homes need to be built. If more homes are planned for and delivered, more people will be able to own or rent their own home. This consultation therefore proposes changes to the standard method to ensure consistency with the objective of building more homes, whilst providing the stability communities need”.

The Governments proposed response is set out in the document and in particular “Clarifying that 2016-based projections are not a justification for lower housing need”. Therefore, the higher numbers suggested above are still very relevant.
Further the draft plan having been submitted in July 2018, is not intended to be assessed in respect of housing need, by reference to the standardised method for assessing housing need.

At para 2.3 the Inspector asks:

“If the Plan is unlikely to meet the identified needs within the relevant time period, how should this be addressed?”

As we have indicated in our submissions and also as stated in those by others, it is not considered that the plan makes adequate provision for its housing need and also that even on the housing need suggested inadequate provision is made through the strategic and other sites for that number of housing units to be delivered.

Table 2 of the submission plan shows a shortfall of 27 units against the suggested housing requirement during the plan period. Whilst this may appear a small number against the overall housing need figure, with this larger figure and the number of sites it is spread across, the risk of the shortfall in housing numbers occurring greatly increases. This is particularly the case with the significant infrastructure constraints in the Borough.

On either of these basis the plan cannot meet the relevant level of identified need with the time period. Therefore, the Plan would fail to deliver an adequate supply of housing numbers including affordable housing and/or require an early review of the plan either to identify additional urban or brownfield sites for housing or through further release of Green Belt land.

This can be addressed now by identifying a greater density of housing delivery on either those sites listed in row J of Table 1 under Policy SD2 and/or expending the size of some of those sites, such as the Pantiles site that can accommodate a far greater number of residential units.