Hearing Statement for
Stellican Ltd

RUNNYMEDE 2030 LOCAL PLAN
EXAMINATION HEARINGS
STAGE 2, MATTERS 5-7

18 January 2019

Our Ref: HJOA/18-00239
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INTRODUCTION

1.1 This Hearing Statement has been prepared by Rapleys on behalf of Stellican Ltd. and covers the following matters for Stage 2 of the examination of the Runnymede 2030 Local Plan:

- Matter 5 - Longcross Garden Village;
- Matter 6 - Other Allocations for Housing and Mixed Uses; and
- Matter 7 - Detailed Policies for Housing.

1.2 This statement follows two representations and one hearing statement submitted by Rapleys to (respectively) two Regulation 19 consultations and one examination hearing held in 2018, and should be read in the context of these documents. The earlier hearing statement is attached at Appendix 1 for reference.

1.3 Stellican Ltd. is promoting Land to the west of Blays Lane for development. The site is 30 acres (approximately 12 ha) and suitable for both student and residential development. This has been stated across our submissions, and most directly addressed in the proposed draft policy contained within our representation of February 2018.

SUMMARY OF POINTS

1.4 The response to the Matters raised below are, in summary:

- The anticipated completion rate at Longcross Garden Village is not realistic. The Local Plan is overly reliant on the scheme to ensure a deliverable supply of housing, and is unsound in this regard;
- The Council’s review of Green Belt boundaries, although conducted initially within an appropriate methodology framework, has failed to identify suitable sites in close proximity to Englefield Green - where there is a site specific and pressing need for additional open-market housing. Such housing would assist in overcoming the existing “studentification” problems in close proximity to Royal Holloway University of London - for which there is also a pressing need for additional off-campus site allocation for student housing.
- The non-allocation of the Sandylands Home Farm, Blays Lane Site 36 is an unacceptable omission, especially as removal of this site from the Green Belt area would not undermine in any fundamental way the purposes of Green Belt designation.
- The estimated affordable housing need (as stated within the latest SHMA) is justified, but additional housing land is needed in order to ensure that the Plan delivers a quantum of affordable housing that comes closer to the need. There is no convincing evidence that development in Runnymede is capable of providing 35%. Even if it will, a 35% policy requirement on larger sites will not deliver anywhere near sufficient affordable housing to meet the need hence the need to uplift the overall housing requirement;
- 30% of the total housing target will not provide anywhere near enough affordable housing in the context of the identified need, and there is evidence to suggest that this target is itself unrealistic; and
- The plan does not provide a positive and effective framework to meet the need of student accommodation. The policy should be more flexible, and further land should be additionally identified to meet both the existing studentification, and the anticipated undersupply against the likely future requirement.
MATTER 5: LONGCROSS GARDEN VILLAGE

5.2 Is the expected rate of housing completions within 5 years of the adoption of the Plan (740 dwellings, 2019/20-2023/24 (SD_023G, July 2018)) and the target of at least 1700 completions by 2030 justified by robust evidence, including progress to date on master planning, outline and full planning permissions, and market evidence of achievability and deliverability? Have any potential barriers to delivery been identified? Is there sufficient flexibility to address them?

2.1 The anticipated rate of housing completions is not justified by clear and robust evidence which is now required under the 2018 NPPF in considering whether land which does not have the benefit of a detailed planning permission is deliverable. The burden is now firmly on the Council to produce this evidence and the PPG sets out the nature of the evidence that a Council is expected to produce to discharge this burden. It does not appear that any of the information expected under the PPG has been provided. Only 200 units have planning permission, and no planning applications are pending for the remainder of the site at the time of writing. The Plan relies on housing coming forward in 2020/21, notwithstanding that there is no sign that the promoters are close to even submitting a planning application. The Council have not discharged the burden now placed on them by the NPPF.

SITE OVERVIEW

2.2 The site is a former MoD base, and was used as a tank factory and test track. It is now a film studio.

2.3 Within the emerging Plan, the entire site is designated within a Biodiversity Open Area; its centre is an Area of Archaeological Potential. It is within the 5km buffer zone of the Thames Basin Heaths SPA with the exception of the southwestern portion, which is in the 400m buffer zone. It is proposed for removal from Green Belt.

2.4 A planning application for 200 units was submitted 31 July 2013 (reference RU.13/0856), registered 13 August 2013. Permission was granted 12 August 2014, almost a year after the application was registered. The local authority’s planning search indicates that there are no pending or recently submitted applications for the remaining units across the rest of the site.

HISTORIC TIMELINE

2.5 Attached at Appendix 1 is a timeline for Longcross Garden Village (LGV), published by Runnymede as part of the examination (examination document reference RBCLP_13). Several key events are provided:

- **August 2007** - site is considered by the South East Plan Panel for inclusion for development of 2,500 dwellings, subject to a Green Belt review;
- **February/March 2010** - Single issue consultation on the Green Belt Review. Longcross identified for inclusion in the Core Strategy;
- **July 2014** - Local Plan Core Strategy is withdrawn from examination;
- **August 2014** - Hybrid application for 200 dwellings, 79,000 sqm employment floorspace, 30,000 sqm data centre, retail and D Class Uses;
- **July 2016** - Runnymede submits bid to Government for capacity funding for a Garden Village at Longcross (successful: £230,000 was awarded in December 2017);
- **July 2018** - Submission of Local Plan to Secretary of State, in which Longcross Garden Village is identified for a minimum of 1,700 units.

2.6 In over ten years of promotion, the site has secured permission for only 200 units, despite:
• being actively considered for strategic allocation in the South East Plan, the withdrawn Local Plan Core Strategy, and the current Local Plan; and
• the securing of funds for a Garden Village on the site in December 2017.

POLICY SD10 - LONGCROSS GARDEN VILLAGE

2.7 The policy establishes requirements for consent to be granted, which may jeopardise the timely and viable delivery of the site. It states that consent will be permitted if it can be demonstrated that several criteria will be met. Some of these are included below (minor modifications shown in underlined italics):

- 35% of net additional dwellings as affordable;
- Delivery of on- and off-site improvements to road network to mitigate significant impacts as set out (but not limited to) in the Infrastructure Delivery Plan, and contribute towards or delivery of improvements to the A320 as set out in the final A320 Study;
- Avoid impact to the Thames Basin Heaths SPA through an approved scheme of mitigation which makes provision for the delivery of SANG and a financial contribution(s) towards SAMM;
- Provide or contribute to any other infrastructure identified at application stage which is necessary to make the site acceptable in planning terms; and
- It will be expected that development is delivered at an appropriate pace, in particular with regard to necessary highways and utilities infrastructure requirements as identified in the Council’s most up to date evidence of infrastructure needs and in site specific assessments.

2.8 With regard to these requirements, the following is noted:

- The S106 agreement for the 200 units (granted permission under RU.13/0856) was signed 13 August 2014. It agreed, inter alia, to the provision of 25% affordable housing only. This is 10% below the requirement set out in the draft policy and there is no meaningful evidence that a higher figure will be viable in future phases;
- The full extent of mitigation required to offset the impact of the scheme on the road network (including the A320) is not yet known. The A320 is currently the subject of sustained debate. Further evidence is currently being prepared by the local authority in this regard. Owing to the expected importance this will have on the soundness of the Plan, the hearing on the A320 will not be discussed on Day 8 (20 February) as initially stated, and has been deferred until a later date. Pending further evidence, it is not possible to confirm the viability of the scheme in transport terms;
- The requirement of SANG and SAMM provision (alongside any other required infrastructure identified at the application stage) is supported, but may put further pressure on the viability of the scheme. Evidence on this matter is required;
- The delivery of the scheme at an appropriate pace, ‘in particular with regard to necessary highways and utilities requirements’ is supported. However, this is reliant upon the Council’s most up to date evidence, which (in terms of highways) is currently in the process of being prepared. The full requirements are not currently known, and it is not possible to say with certainty what impact this will have on timescales.

ANTICIPATED TIMESCALES

2.9 The SHLA (January 2018) states the following rate of delivery at LGV over the Plan period:
<table>
<thead>
<tr>
<th>Year</th>
<th>Per annum</th>
<th>Cumulative</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016/17</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2017/18</td>
<td>70</td>
<td>70</td>
</tr>
<tr>
<td>2018/19</td>
<td>38</td>
<td>108</td>
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<td>2019/20</td>
<td>90</td>
<td>198</td>
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<tr>
<td>2022/23</td>
<td>150</td>
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<td>1,448</td>
</tr>
<tr>
<td>2028/29</td>
<td>150</td>
<td>1,598</td>
</tr>
<tr>
<td>2029/30</td>
<td>120</td>
<td>1,718</td>
</tr>
</tbody>
</table>

Source: Runnymede, SLAA Report, January 2018

2.10 The 200 units that already have permission may cover the rate of delivery up to 2019/20, after which the remainder of the site will need to contribute. This will require, at a minimum, the following before the construction of any additional residential development can commence:

- Preparation and submission of planning application;
- Agreement of S106;
- Securing of planning permission;
- Discharge of any pre-commencement conditions;
- Remediation, treatment, preparation of land; and
- Commencement and completion of required infrastructure.

2.11 It is highly improbable that all of this, let alone the completion of 150 dwellings, can take place by the year 2020/21.

2.12 The expected completion of 740 dwellings at LGV within 5 years of the Plan’s adoption (2019/20-2023/24) is not justified by the evidence, and neither is the target of at least 1,700 completions by 2030. In the absence of a pending planning application, it is impossible to place certainty on the site delivering any housing within the next five years, let alone the 740 units suggested.
SUMMARY

2.13 LGV is allocated for a minimum of 1,700 units in the Plan, of which 200 have planning permission. Discounting these from the supply the site must start to deliver 150 units a year from 2020 onwards if it is to contribute to the housing supply as stated in the 2018 SLAA. These units do not have planning permission (indeed a planning application has not been submitted), and it is unrealistic to expect that these will come forward as anticipated.

2.14 The expected completion of 740 dwellings at LGV within 5 years of the Plan’s adoption is therefore unrealistic, as is the target of at least 1,700 completions by 2030. The approved units notwithstanding, it is more likely that the site will not deliver any housing within the next five years.

2.15 This assessment is made without taking into consideration the following known uncertainties, which are likely to delay the delivery of housing further:

- The site’s archaeological potential;
- The proximity to the SPA;
- The uncertain contributions required to mitigate highways impact;
- The concerns regarding the policy requirement of 35% affordable housing, considering the previous approval provides only 25%; and
- The impact that contributions taken together may have on the viability of the site.

2.16 The Plan is hugely reliant on the timely delivery of LGV, and without it will fail to demonstrate both a deliverable five year supply of housing, and adequate delivery across the previous three years. The unrealistic delivery targets for LGV therefore go to the heart of the Plan’s soundness. As currently drafted the Plan is unsound with regard to its housing trajectory.

LAND WEST OF BLAYS LANE

2.17 Our client is promoting Land west of Blays Lane for student and/or residential development. The site comprises approximately 12 ha of immediately developable land, and can start to deliver housing in the short term. This will help to mitigate the imminent undersupply that will arise as a result of the expected delay to LGV’s delivery.

2.18 In order to ensure the Plan’s soundness, Land west of Blays Lane should be identified for development to meet projected undersupply within Runnymede.
3 MATTER 6: OTHER ALLOCATIONS FOR HOUSING AND MIXED USES

6.1 Have the other site allocations in Policy SD3 and detailed in Policies SL2-SL18 emerged from a thorough, objective assessment of all potential sites, including review of Green Belt boundaries, sustainability appraisal and Habitats Regulations Assessment where necessary? In particular:

3.1 Although the Green Belt Review has followed a logical methodology, it has failed to distinguish between the relative significance of each of the Green Belt five purposes (as identified in NPPF Para 134) when considered on an area by area or site by site basis.

3.2 In this respect, the ARUP acknowledgement should be noted from the final Green Belt Review Part 2 Report (24th March 2017) under the Purpose Of Review page 3, fourth bullet point:

“The GBR Part 2 should not seek to balance Green Belt purposes with other sustainability objectives; the Council will undertake this balancing exercise as part of its wider site selection work that will underpin the Local Plan.”

3.3 It is therefore the Council’s application of the Green Belt findings and their subsequent review/balancing of rival sites that has been flawed. Green Belt criteria alone should not be the primary determinant.

3.4 As part of the earlier submission, the drawing at Appendix 3 demonstrates how the allocation of the Blays Lane Site 36, adjacent to the Blays House Site Policy SL5 allocation, would not in fact reduce the “separation” distance between Englefield Green and Virginia Water to the south or the development boundary to the west.

3.5 In terms of sustainability appraisal, the social considerations of the location of identified sites for housing and their relationship with community needs has also been progressed on a flawed basis.

a) In selecting the allocations, has the Council applied suitable methodologies in a consistent way? If not, what are the weaknesses in the evidence base, do they fundamentally undermine the plan-making process, and which of the allocations may be unsound?

3.6 In its approach to the selection of allocations the Council has not given sufficient consideration to the demand for additional housing and off-campus student housing in close proximity to the Royal Holloway University of London which has reduced the available provision of sufficient general housing in the Englefield Green area - which can only lead to a worsening of the identified “studentification” problems. Due to this inadequate consideration there is a need to allocate more land to address this worsening situation. In particular the non-allocation of the Sandylands Home Farm, Blays Lane Site 36 is a significant omission, especially given its suitability and close proximity to provide either sustainably located open-market housing or an off-campus site for student housing for which a scheme proposal has already been prepared.

3.7 A site comparison between Site 36 at Blays Lane, Englefield Green and five other sites is set out in Appendix 4. It was provided in the October 2015 Representation by Martin Leay Associates on behalf of Stellican (as submitted to RBC in October 2013 to demonstrate how favourably the Blays Lane site compares with the RBC SHLAA sites in terms of sustainability criteria). In conclusion on this sustainability comparison point, the final column in the table reviews whether there is easy walking distance for each of the seven sites to the Royal Holloway University of London and which is not the case for five out of the seven sites. This
finding emphasises the point that the sustainable location of student housing has to be a primary consideration when considering the related Green Belt Review.

b) Is it clear why the Council has decided to allocate the specific sites and not others?

3.8 It appears that the Council’s choice of sites to be allocated has been over-influenced by Green Belt criteria alone rather than taking into account the other sustainability objectives that relate to area specific needs, in this case including the requirement for sustainably located student housing and the overlooked shortfall of housing provision at Englefield Green - resulting in the already existing problems of studentification.

3.9 It is not clear why the Council has decided to allocate the Blays Lane site in the plan and not the land to the west of Blays Lane. The non-allocation of Blays Lane Site 36 is an omission from the Local Plan’s ability to deliver much needed additional housing or student housing in the Englefield Green area. Not to do so appears to rely, falsely, on assumed harm to the purposes of Green Belt designation if the site were removed from the Green Belt.

c) Is the proposed development of each of the allocated sites consistent with the Plan’s spatial vision and objectives and with national planning policy?

3.10 Although the planned spatial vision and objectives allows for sites to be removed from the Green Belt where there is a demonstrated need, the sites proposed do not allow for sufficient development adjacent to Englefield Green and on the basis of the above noted points.
MATTER 7: DETAILED POLICIES FOR HOUSING

7.3 Is the estimated annual affordable housing need of 471 dwellings and the 80:20 tenure split (affordable rent/social rent: other forms of affordable housing) robust? In this light, and taking account of the market signals adjustment and the viability evidence, is the Policy SL20 target of 35% affordable housing provision from market schemes justified and likely to be achieved?

4.1 As discussed in our hearing statement for Stage 1 (in particular Matters 2.1(c) and 2.3), the affordable housing need of 471 per annum is justified. However in a best case scenario, the Plan will provide - at most - only 38% of this (178 affordable dwellings per annum) if one takes the proposed target of 35% net affordable dwellings on sites from market schemes. This is inadequate.

4.2 Not only is the level of affordable housing that will be delivered inadequate the 35% target on larger sites is unlikely to be achieved based on the current evidence of market schemes. In our experience few schemes deliver this level of affordable housing. Taking as an example the approved development of 200 units at LGV, only 25% will be affordable according to the S106. The policy target of 35% affordable housing provision from market schemes is highly unlikely to be achieved, as there is no meaningful evidence to support this.

7.4 How will the overall 30% target in Policy SL20 be achieved over the Plan period? Can this be demonstrated in an affordable housing trajectory in the Plan?

4.3 The delivery of 30% affordable is not achievable - as an example, the 200 units at LGV approved at LGV provided only 25% net additional affordable units.

4.4 Even if the target was achievable, it would not provide an adequate quantity of affordable housing to approach the requirements of the borough. In the context of an overall policy target of 7,629 over the plan period, equating to 509 units per year, the delivery of 30% affordable would provide 153 affordable dwellings per year. This represents 32% of the need for affordable housing identified in the SHMA (see below). Additional land needs to be identified to ensure that the delivery of affordable housing comes closer to the borough’s requirements.

<table>
<thead>
<tr>
<th>Overall Housing Target (total)</th>
<th>7,629</th>
</tr>
</thead>
<tbody>
<tr>
<td>Overall Housing Target (pa)</td>
<td>509</td>
</tr>
<tr>
<td>30% affordable delivery (pa)</td>
<td>153</td>
</tr>
<tr>
<td>Affordable Need</td>
<td>471</td>
</tr>
<tr>
<td>Percentage of affordable need met</td>
<td>32%</td>
</tr>
</tbody>
</table>

4.5 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 affordable need and potentially up to at least 70% of the need. If the 30% target is preserved for the overall delivery of housing within Runnymede, this would require an overall housing target of between 786 to 1,093 dpa (shown below):
### More housing land needs to be identified to ensure that a sufficient supply of affordable housing can be demonstrated. Land west of Blays Lane is available to meet this need, and should be identified for the short-term delivery of such growth.

#### 7.9 Taken together with other relevant policies in the Plan, will Policy SL23 and SD8 help to ensure that the accommodation needs of the elderly and those with particular needs will be addressed over the Plan period? Also, does Policy SL23 provide a positive and effective framework to meet the need for student accommodation? Is the Plan’s approach consistent with the evidence of these types of housing need?

### No. The level of student need within the borough has been addressed at length within both our representations, and the Stage 1 hearing statement (in particular regarding issues 2.1(c), 2.3 and 3.1(a). In a best case scenario the Plan will generate a deficit of 1,043 student bedspaces over the Plan period (equivalent to approximately 261 private dwellings). In a worst case scenario the deficit will be 3,498 bedspaces (approximately 875 private dwellings).

There is no provision in the plan that recognises this problem let alone makes any policy provision to address it. There is a policy need to recognise what the level of need for student accommodation is and identify sufficient land to meet that need.

### 4.8 Policy SL23 requires that student development meet all of the following criteria:

- The proposal is supported by evidence of a linkage with one or more higher education institutions in Runnymede, or within a reasonable travelling distance of Runnymede;
- The proposal is located in an area with easy access to shops, places of work, services and community facilities and sustainable and active modes of travel to the educational institution for which accommodation is provided; and
- The proposal has provided for the specific needs of student housing, including refuse storage, cycle parking and adequate internal space for future occupiers.

### With regard to the available evidence for student need (such as that contained within Appendix 2 of our representation of February 2018), the Plan’s proposed approach fails to reckon at all with the degree of need within Runnymede for such accommodation. Not only is the growing undersupply a concern, but the existing problems of studentification makes it clear that this is a current problem, not merely a future one. Policy provision in the plan needs to address this. Policy SL23 does not do this, it is a development control criteria based policy that merely guides how an application should be determined if one comes forward. It does not ensure that the need for student accommodation is in fact met.

### Considering the presence of an undersupply, even within a best case scenario (c.f. Table 2 within our hearing statement to Stage 1), this policy is not sufficient. The Plan’s proposed strategy for meeting student need should identify that need and the additional land for student housing to meet it.
4.11 Land west of Blays Lane is available to meet this need in the immediate term, and should be allocated to provide for either student accommodation and/or open market housing given that due to its location it will alleviate the studentification problem however it is developed. In our representation of February 2018, a draft policy was suggested that allowed the site to provide student and/or residential development to meet the needs of Runnymede as required. This policy, as drafted, remains a viable solution for addressing Runnymede’s housing and student requirements, and should be included within the Plan to ensure its soundness.