Runnymede 2030 Local Plan Examination
Stage 2 Hearing Sessions

Matter 8 Hearing Statement
HEARING STATEMENT TO THE RUNNYMEDE 2030 LOCAL PLAN EXAMINATION – MATTER 8

With reference to previous representations made on behalf of Simco Homes in relation to Land off Rosemary Lane, Thorpe.

1.0 Introduction

1.1 The following statement has been prepared by Coda Planning Ltd on behalf of Simco Homes (‘SH’) in support of our participation in the Runnymede 2030 Local Plan Examination Stage 2 Hearing Sessions relating to Main Matter 8.

1.2 As previously established, various representations have already been made on behalf of SH relating to the site to which their interest relates (SLAA ID 32, as referred to in Appendix B of the submission plan) throughout the Local Plan consultation process. These have broadly established that:

- The approach towards dealing with the significant constraint of the Borough’s Green Belt is now much more positive, partly as a result of the underlying work in the evidence base to assess and review different areas of the Green Belt.

- As a result of this the proposed amendments to the Green Belt boundary will serve to ensure longer-term protection of functional areas of the Green Belt as well as help to fulfil the Borough’s statutory obligations as a Local Planning Authority.

- More broadly but with particular reference to the subject site, it has been established that further site-specific analysis and modifications must be undertaken to ensure maximum appropriate efficiency is achieved when it comes to Green Belt release.

- As a result of this understanding it has been demonstrated that the subject site has a higher capacity (up to 83 dwellings) than is currently suggested by the LPA (and separately indicated by the Thorpe Neighbourhood Forum) in Appendix B of the submitted Local Plan.

1.3 Furthermore, our attendance at the Stage 1 Hearing Sessions included a certain amount of discussion in relation to Thorpe and various related topics with relevance to the site. It is considered that these discussions established a general consensus of position with the LPA that the particular site in question - as part of the wider Thorpe Village- should be released from the Green Belt, and that within that context the site in question is suitable to accommodate a certain amount of sustainable development.
2.0  Statement

2.2.0  Matter 8 – Housing Land Supply  (Table 2, Policy SD3, Appendix B, and relevant details of the individual site allocation policies)

2.2.1  Within this matter SH wish to address a number of points that relate between the implications of the role of subject site SLAA 32 in the housing land supply (as one of the SLAA sites), and its estimated capacity as set out with Appendix B of the Plan.

2.2.2  In this regard, more specifically point 8.1 c) of examination document ID11 (as updated 15/01/19) queries:

‘Are the estimates of site capacities (for the site allocations/opportunity areas, SLAA sites and estates regeneration) robust, taking account of viability, infrastructure and any other delivery constraint?’

2.2.3  They are not. While the detail set out within the main housing allocations (Policies SL2 – SL18) establishes a certain robustness of the estimated capacities for those sites, it is unclear whether the estimates of others (including the SLAA sites) are based on any evidence that might reasonably be described as ‘robust’.

2.2.4  With reference to the site to which this representation relates, and to exemplify this point, there is no clear basis established within the Plan (or evidence base) from which the estimated capacity of SLAA 32 (24 dwellings as per Appendix B of the Plan) derives. To specifically answer the Inspector’s question, there is a further lack of evidence as to whether account has been taken of viability, infrastructure or any other potential constraints to delivery. As a result, the simple answer is that there does not appear to be any evidenced basis on which these capacity estimates have been made, and therefore their robustness can be questioned.

2.2.5  SH have undertaken an exhaustive process of evidence-gathering with relation to SLAA 32, and this evidence indicates a much greater capacity than that indicated within Appendix B of the Plan – up to 83 dwellings. The extent and depth of this process is such that an outline planning application has been submitted to the LPA with positive discussion having taken place with development management officers. This process is exhaustive in that it takes account of viability, infrastructure - both physical (e.g. highways/drainage) and community-based (e.g. education) - and other constraints. A comprehensive design process has informed this assessment of other constraints, which as such accounts for all factors that must be considered within the development management process, e.g. density, separation distances, amenity, conservation/heritage matters, ecology etc. Consequently it is a matter of fact
that SH’s identified capacity for SLAA 32 is very significantly more robust that the LPA’s estimate.

2.2.6 Despite involving the LPA (i.e. policy officers) in the process that has been undertaken (through pre-application enquiries and emerging Plan public consultations) they have not elected to make use of this evidence in making their capacity estimate. It is not apparent why this is the case, and this is a serious outstanding concern given that it represents an opportunity for the evidence on which the Plan is based to be more robust; an opportunity that would enable the LPA’s expected housing delivery (in Table 2 of Policy SD2 of the Plan) to be more accurate.

2.2.7 While the above takes SLAA 32 as an example, we would suggest that there is no reason to believe that it is an outlier. Therefore it may reasonably be assumed that the estimated capacities of most or indeed all of the Appendix B sites have little evidence informing them. As such, in answering the question of 8.1 c), it is apparent that these estimates are not at all robust.

2.2.8 Beyond this, point 8.2 of examination document ID11 poses the following question:

‘Overall, is the most recent housing trajectory founded on credible evidence about the deliverability and achievability of the proposed development on the identified sites and other sources of supply within the expected timescales? Can there be reasonable confidence that a rolling 5-year supply of deliverable sites will be maintained from the date of the Plan’s adoption?’

2.2.9 With regard to the second part of this question, SH do not seek to challenge the LPA’s assertions on the deliverability and achievability of the main identified housing allocation sites, and as such would not directly challenge the ability of the Plan to maintain a rolling 5-year supply of deliverable sites from adoption. However, within the context established and with relation to SLAA 32, it has been established that the robustness of site capacity estimates is open to question. Therefore SH would highlight a certain degree of uncertainty as to the reliability of the 5-year supply as currently projected by the LPA.

2.2.10 Further to this point and in terms of the first element of the questions at point 8.2, it is therefore the opinion of SH that the most recent housing trajectory does not appear to be founded on credible evidence. This is asserted insofar as the example of SLAA 32 impacts upon the overall trajectory and to the extent that its unsubstantiated capacity estimate can be taken as an indication of the estimates of other sites that form the overall trajectory. This lack of regard given to accurately determining the capacity of sites is reflected on a much larger scale in the ongoing difficulties dealing with the impacts on the strategic road network with Highways England. The Plan makes it clear that the capacity and
deliverability of almost all allocated housing sites depend upon taking account of impacts on the strategic road network, and the fact that this matter has yet to be settled demonstrates the significant uncertainty surrounding the deliverability and achievability of the development on the main housing allocations.

2.2.11 In light of the above, while it is acknowledged that the discrepancies surrounding the capacity indicated for SLAA 32 is clearly unlikely to be of a scale that impacts upon the soundness of the Plan as a whole, it remains a point of weakness in the manner described above. Indeed, given the ongoing uncertainty surrounding strategic highway infrastructure issues and their impact on the Plan, reasonable maximisation of smaller site capacity is likely to become of vital importance in ensuring a 5-year supply can be achieved. It is therefore the assertion of SH that the Plan should be modified to increase the capacity of the site so that it is a more accurate and therefore a more robust element of the overall housing land supply, which itself would become more robust in turn.