Representations on behalf of
The Gribble Family
In respect of land at Pyrcroft Road, Chertsey etc (Site SL6)
relating to the
Runnymede 2030 Draft Local Plan Examination
Matters 3 (cont). To 11

Matter 8
Matter 8  Housing Land Supply

Introduction

These representations are made by Carter Planning Limited (CPL) for the Stage 1 Hearing in respect of the Runnymede Local Plan 2030 Examination, on behalf of the land owners of most of site SL6 Pyrcroft Road, Chertsey, the Gribble Family.

CPL is promoting the development of land at Pyrcroft Road, Chertsey under Policy SL6. Discussions with the Council have been held with a view to the submission of an initial planning application for the required circa 175 dwellings early in the plan period. Much technical work demonstrating the sites availability, suitability and achievability has already been carried out. This area was previously a reserve housing site R3 in the adopted Local Plan 2001. However our representations go further and explain how a larger area of land to the west which is in a sustainable location and under our Clients control, could also be developed to assist with any overall shortfall in housing or to replace other sites which may not come forward.

Matter 8: Housing Land Supply (Table 2, Policy SD3, Appendix B, and relevant details of the individual site allocation policies). Note: The supply of sites for Gypsies and Travellers is considered under Matter 7)

8.1 Is the Plan based on robust evidence about the housing land supply for the period up to 2030? In particular:

a) Is the estimated supply from extant planning permissions, windfalls and prior approvals justified and based on reasonable assumptions?

No comment

Does the methodology avoid the risk of double-counting?

No comment

Is the approach to lapse rates for planning permissions robust? Should lapse rates be applied to site allocations?

The 2012 NPPF and associated PPG do not appear to refer to lapse rates. However the new PPG that accompanies the 2018 NPPF does refer to lapse rates:

“Local planning authorities may need to develop a range of assumptions and benchmarks to help to inform and test assessments. Assumptions can include lapse/non-implementation rates in permissions, lead-in times and build rates, and these assumptions and yardsticks can be used to test delivery information or can be
used where there is no information available from site owners/developers to inform the assessment.”

(Paragraph: 047 Reference ID: 3-047-20180913, Revision date: 13 09 2018)

Monitoring information does appear to indicate that the non-delivery of sites is an issue in Runnymede.

The SLAA January 2018 states:-

“32. Other LPAs use lead-in/build-out data and consider this to be accurate in calculating the housing trajectory, so much so that it is not deemed necessary to apply an ‘under delivery discount’ for non-implementations. For Runnymede, however, considering non-implementations is a useful tool in determining a realistic housing supply. The data has been used to compare granted planning applications between 2010 and 2013 against completions between 2010 and 2016. Any application that was granted but expired within three years was considered to be a non-implementation. These sites were then reviewed and if there was a subsequent live application on the site, this was included towards implementations. The information contained in Appendix 4 suggests that the under delivery discount figure applied in the interim SLAA housing trajectory of 20% was a little cautious and therefore, an average figure of 15% based on local data is considered more accurate and realistic. This figure is applied to sites that do not benefit from planning permission, or do have planning permission but have not started. The exceptions to this are the proposed Local Plan allocations, as officers have engaged with land owners/promoters throughout the Local Plan process and are satisfied that the sites will come forward in the time periods set out in the housing trajectory”.

It is not clear why there is a differentiation between the types of sites, allocated and non allocated. We have no doubt that the Council have engaged with the owners of allocated sites but for added confidence in the estimates, lapse rates on permissions on allocated sites should also been applied to this component to ensure that the results are as robust as possible, provide flexibility, and that sufficient housing is provided bearing in mind the need to significantly boost housing supply and not simply to aim at a target.

b) Is there a sound basis for the expected contribution from Class C2 older people’s accommodation to the Class C3 housing supply?

No comment.

c) 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 constraints? [Note: the details of individual sites will be considered under Matters 6 and 7]
Broadly suitable methodologies and site assessments frameworks seem to have been applied. They take into account the wide range of site/location-specific factors, including viability and infrastructure. Policy constraints and potential for mitigation also appear to have been included. The judgments about the sites that perform best against the Plan’s vision, objectives and spatial strategy and accord with NPPF and are accepted.

As the Inspector will be aware we support the capacity of Site SL6 for 175 plus 100 units. However we believe the site can be enlarged and would suggest that it has a further capacity to accommodate an additional circa 50 units as a Main Modification. It is understood that the figures for each site allocation are not intended as targets to be achieved or caps that should not be exceeded but as indicative figure, based on the best available evidence, to be tested through detailed planning applications in due course. However an additional 50 units could be factored in to the housing land supply figure.

d) Is it realistic to expect that the shortfall in delivery of the housing requirement from the start of the Plan period will be made up within five years of the Plan’s adoption? If not, how should the Plan address this matter?

No it is not realistic to expect the shortfall in housing to be made up in the first five years of the Plan. The Plan could address this by re-examining some of the Phasing dates included in the Table. In particular sites such as SL6 Pyrford Road do not need to be held until 2022 but could come on stream as soon as planning permission is granted, especially as the start of the Plan is rolling forward.

It may be preferable to aspire to set the supply bar as high as possible from the start of the Plan to enable the annual need to be met and to start to tackle the previous under supply. Then it would be possible to gradually increase the requirement through a series of steps to gradually increase the level of completions. This would enable the Council to exceed the requirements by bringing forward development in accordance with the Plan’s policies as a whole.

e) Is it justified to add a 20% buffer to the housing land supply to guard against any under-delivery of sites?

In terms of the 20% buffer, there is clear evidence that there has been persistent under delivery in the early part of the plan period against the housing requirement and therefore a 20% buffer should be applied. The Council’s approach to the calculation of the five year land supply as set out in the Position Note of January 2018 appears to accept the need to apply a 20% buffer.
8.2 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?

We accept that the most recent housing trajectory appears to be 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 although site SL6 Pyrford Road is capable both of coming forward earlier than indicated and to be larger than indicated.

8.3 Does the Plan provide sufficient information about the housing implementation strategy?

No comment

Should it include a housing trajectory in graphical and tabular forms?

Although there does not appear to be a requirement for a housing trajectory in graphical and tabular form that is a normal provision in most Plans and it would aid clarity rapid understanding of this Plan.