HEARING STATEMENT

On Behalf of Ashill (Respondent ID 1481)

Matter 8 – Housing Land Supply

January 2019
1.0 Introduction

1.1 CBRE is appointed to act for Ashill on behalf of their land interests at Christmas Tree Farm (SLAA 284) and Stroude Farm (SLAA 13). Within the submission Local Plan both have the status of omission sites.

1.2 As discussed in more detail in Chapter 3 of this Matter Statement, both sites are strategically located and offer a solution to the identified issues of soundness arising from Matter 8.

1.3 For reference the two sites are identified in Appendix A.

1.4 Ashill have previously made representations during the Additional Sites and Options Consultation and Pre-Submission Consultation (February and May 2018). The representation references for this submission is 1481.
2.0 Matter 8: Housing Land Supply

QUESTION 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? Does the methodology avoid the risk of double-counting? Is the approach to lapse rates for planning permissions robust? Should lapse rates be applied to site allocations?

Response to Q8.1A

2.1 For the reasons set out below it is apparent that there are incorrect assumptions within the housing supply methodology that result in an approach that is not justified.

2.2 Table 2 of CD_001 sets out the assumed sources of housing supply from the period of 2015 – 2030. With specific references to those individual sources identified in Question 8.1a of the Inspectors Matter 8 Agenda, on the Council’s assumptions these total a supply of 1061 homes of the housing required to meet objectively assessed needs:

Expected Housing Delivery 2015 to 2030

<table>
<thead>
<tr>
<th>REF</th>
<th>COMPONENT</th>
<th>RBC ASSUMPTION</th>
<th>CBRE REVISION</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Extant Planning Permissions</td>
<td>493</td>
<td>413</td>
</tr>
<tr>
<td>2</td>
<td>Windfalls</td>
<td>270</td>
<td>No Comments</td>
</tr>
<tr>
<td>3</td>
<td>Prior Approvals</td>
<td>211</td>
<td>120</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1061</td>
<td>803</td>
</tr>
</tbody>
</table>

2.3 Planning Practice Guidance (Paragraph 047) states that when making assumption on housing land availability assessments ‘Assumptions should be based on clear evidence, consulted upon with stakeholders, including developers, and regularly reviewed and tested against actual performance on comparable sites. Tables of assumptions should be clear and transparent and available as part of assessments.’

2.4 Our amendment to the above table and our written responses below update our previous assumptions made in the Regulation 19 submission in February 2018 and is informed by more recent evidence, including:

- Annual Monitoring Report 2017/2018
- SD_023G – Runnymede Updated Housing Trajectory (July 2018)

Extant Planning Permissions

2.5 RBCLP_02_RBC (July 2018) confirms that 493 homes are anticipated to come from existing planning permission (5 net and above). Having now had sight of the additional evidence provided at Appendix 2 of RBCLP_02_RBC our calculation of this is 413 units. From our observations it looks like the discrepancy may be due to double counting in the approach. It is also important to note that of the 493 totalled, almost half represent sites that have planning permission but no work has started on site.

1 Based on RBCLP_02_RBC
2.0 Matter 8: Housing Land Supply

Prior Approvals

2.6 Appendix 3 of RBCLP_02_RBC confirms Runnymede’s approach to forecasting prior approval as a source of supply. Since May 2013 it is confirmed that there have been 95 completions, which is averaged as circa 19 completions per year.

2.7 Following its launch in May 2013 it is commonly reported that there was an initial ‘rush’ to seize office to residential opportunities but that this trend is now slowing up as available sites are converted. As such, it is inappropriate for Appendix 3 to assume an average will continue during the plan period up to 2030. A slight reduction in supply is acknowledged by Runnymede from Year 6 of 15%. However, such a reduction needs to be increased as at present the approach to forecasting prior approvals is not reflected by appropriate evidence and should be reduced as a source of supply from the period of 2015 – 2030.

Lapse Rates

2.8 As further detailed in Matter 5 and Matter 3 of our Hearing Statements, there is significant reliance upon a number of site allocations of infrastructure upgrades to the A320 being agreed in a timely manner. Given the observed uncertainty on this (especially in light of more recent discussions during the examination with Highways England), it is highly likely that there will be a slowdown in the delivery of the housing supply assumed from larger sites. This is particularly the case at Longcross Garden Village and is set out in detail in our Matter 5 submission. In this context the plan will not be effective at delivering its identified needs as housing completions will fall short of that required.

2.9 Within SD_023G there is a reference in the table to ‘Discounted 15% on certain C3 sites for non-implementation.’ The evidence lacks transparency as to the source of this figure and it is suggested that this is clarified through the examination process. As drafted, it would appear that the housing land supply position underestimates lapse rates.

Response to Q8.1C

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?

2.10 As per our response to Q8.1A, our Matter 5 statement deals with our substantive response to the assumed site capacity to be delivered by Longcross Garden Village during the plan period. Whilst we have no reason to question the overall capacity assumed for the site, for the reasons set out in Matter 5 there is significant doubt as to the potential for the full capacity of the site to be realised within the plan period. As such, this will have a directly impact upon the housing land supply position.

Response to Q8.1D & E

2.11 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?

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

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2.0 Matter 8: Housing Land Supply

2.12 In its Five-Year Land Supply Paper dated January 2018 Runnymede note:

‘The Council did not deliver against objectively assessed needs in years 2015/16 and 2016/17, resulting in a shortfall of 468 dwellings, which the Council will make up in the next five years. This results in an additional 94 dwellings being needed per annum. Added to the Local Plan target of 494, this equals 588 houses to be delivered each year for the next five years. The NPPF also sets out that the Council should provide a buffer moved forward from later in the Plan to ensure choice and competition in the market. The Council accepts, because of problems in recent years in delivering against requirements, that it is a persistent under deliverer. If a 20% buffer is added to 588 dwellings per year, the total that would need to be delivered is 706 dwellings. The Council is unable to meet this level of housing. On this basis, the Council is unable to demonstrate a five-year housing land supply.’

2.13 The Housing Trajectory July 2018 (SD_023G) currently reports that Runnymede will be delivering a surplus of housing (when the existing backlog of housing is accounted for) in 2020/2021. When the source of housing supply in the first five years of the adopted plan (assumed for these permitted to be late 2019) is considered it is apparent that it comprises (1) sites that are contingent upon the A320 mitigation being delivered and (2) reliant on other sites that cannot be delivered due to fundamental barriers to delivery (Virginia Water North – refer to Matter 6 Statement). It also includes a significant contribution from Longcross Garden Village in the early years of the plan which is not considered to be realistic (see Matter 5 Statement).

2.14 Given the delays and uncertainty to the proposed mitigation works required to the A320, it is anticipated that there will be a significant delay to the proposed supply of housing from these sites. In seeking to resolve this it is important that sites are included in the plan that (1) are outside of the A320 stress area and (2) help to deliver the necessary infrastructure works where possible. In respect to (1) the approach to seek to identify sites through a Main Modifications process was recently undertaken by Guildford Borough Council in looking to mitigate the potential for delays in the delivery of necessary upgrade works to the A3. As stated in ID/06 of the Guildford Inspector’s Response:

‘In the circumstances the Council should not adopt a stepped trajectory, but should identify additional sources of housing delivery in the early years of the Plan. If new site allocations are required for this purpose they will need to be in locations that are not dependent on the completion of the A3 RIS which is not due until 2027 at the earliest. From evidence submitted to the examination so far, I am not convinced that such sites do not exist, or that they would fundamentally alter the spatial strategy.’

2.15 Through our submission to Matter 6 and conclusions with regards to the Housing Methodology Assessment, it is clear that there are other available sites that have not been allocated for development and, if they were to be so, would resolve the identified issues of soundness identified above.

2.16 Runnymede in January 2018 confirm that they represent an authority that is a ‘persistent under deliverer.’ This is not in doubt. For similar reasons to that expressed in Paragraph 2.15, it is apparent that there are suitable sites that could be included as allocations through the Main Modifications process that would enable the level of housing (at a 20% buffer) to be met.
2.0 Matter 8: Housing Land Supply

QUESTION 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?

Response Q8.2

Delivery of A320 Upgrades

2.17 Our Matter 3 and forthcoming Matter 10 Statements will deal with the substantive response to the deliverability of the proposed A320 mitigation. At this stage, and in response to Question 8.2, we wish to highlight that as detailed in the submitted Plan (CD_001) 5 site allocations (totalling 728) are reliant upon the delivery of mitigation to the A320. The list below excludes St Peter’s Hospital which we are aware has recently had planning permission granted.

Site Allocations Contingent on A320 Mitigation (as reported in CD_001)

<table>
<thead>
<tr>
<th>SITE</th>
<th>UNIT NUMBERS</th>
<th>PHASING</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chertsey Bittams. Parcel A. Green Lane</td>
<td>175</td>
<td>2019 – 2022</td>
</tr>
<tr>
<td>Chertsey Bittams. Parcel B. Woodside Farm</td>
<td>120</td>
<td>2022 – 2024</td>
</tr>
<tr>
<td>Chertsey Bittams. Parcel C. Last east of Woodside Farm</td>
<td>35</td>
<td>Post 2027</td>
</tr>
<tr>
<td>Chertsey Bittams. Parcel D. Oracle Park</td>
<td>200 + 93 Bed Care Home</td>
<td>2019 – 2022</td>
</tr>
<tr>
<td>Chertsey Bittams. Parcel E. Land east of Wheelers Green</td>
<td>105</td>
<td>2022 - 2027</td>
</tr>
<tr>
<td>Total</td>
<td>728</td>
<td>/</td>
</tr>
</tbody>
</table>

Source: CD_001

2.18 In addition to the sites at Chertsey Bittams, the A320 Study (SD_015H) also identifies the following key developments along the A320 corridor:

- Longcross Garden Village – 1,700 Homes
- Veterinary Laboratory site at Rowtown – 210 Homes
- Ottershaw East – 250 Homes
- Brox End Nursery – 40 Homes
- Pyrcroft Road Housing Site – 280 Units

2.19 Collectively the Runnymede allocations in the A320 study total 3,590 or 48% of the minimum housing target for the Plan.

2.20 For the reasons set out in Matter 3 and our forthcoming Matter 10 Statement there is significant uncertainty of the required upgrades being delivered in a timely manner (as required by Paragraph 177 of the NPPF) which will directly and significantly affect the housing trajectory, particularly in the first five years of the Plan.

2.21 In addition and with specific reference to Longcross Garden Village, there is significant uncertainty as to the proposed rate of delivery from Longcross Garden Village being realised (see Matter 5 for further details).
2.0 Matter 8: Housing Land Supply

2.22 Without Main Modifications the Plan will be unsound as it will not be effective in delivering much needed homes within the required timeframes. The Plan would also be inconsistent with Paragraph 47 of the NPPF as at the point of adoption the Council would be unable to provide five years’ worth of housing against their housing requirement.
3.0 Main Modifications Required to Matter 8

3.1 In order to address the soundness issues identified in response to Matter 8 the following Main Modifications are required to the plan:

1. Allocate sites outside of the A320 Stress Area to allow housing delivery that is divorced from the uncertainties associated with the mitigation being delivered in a timely manner. SLAA13 represents a site that would respond to this.

2. Allocate development and land at Christmas Tree Farm (consistent with the identification in the A320 study) to allow the current uncertainties with the A320 package of mitigation for Junction 10 (and associated delays to housing delivery) to be resolved. Resolution on the A320 is a fundamental issue for the plan and particularly the ability for the plan to ensure it can maintain a rolling 5 years of deliverable sites.
3.0 Main Modifications Required to Matter 8

Appendix A – Site Location Plan