16 January 2019

Dear Charlotte,

Runnymede 2030 Local Plan Stage 2 Hearing Statements

I write in response to the main matters and questions for Stage 2 Hearings as part of the Runnymede Local Plan examination where PRP is acting on behalf of PLP. The statements submitted relate to Matters 6 and 8.

6. **MATTER 6: OTHER ALLOCATIONS FOR HOUSING AND MIXED USES (POLICIES SD3, SL2- SL18 AND SUPPORTING TEXT)**

*Information removed by Runnymede Borough Council - Matter 6 part of letter displayed in Matter 6 section of webpage*
MATTER 8: HOUSING LAND SUPPLY

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?

No comments.

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

Class C2 is distinctly different in terms of accommodation to class C3. The current categories come from the Town and Country Planning (use classes) Order 1987 and subsequent amendments. Use Class C2 is defined as:

‘Use for the provision of residential accommodation and care to people in need of care (other than a use within a class C3 (dwelling house). Use as a hospital or nursing home. Use as a residential school, college and training centre.’

Following circular 8/2010 Class C3 is a dwelling house which is now defined as:

- C3(a) those living together as a single household – a family
- C3(b) those living together as a single household and receiving care
- C3(c) those living together as a single household who do not fall within C4 definitions of a house in multiple occupancy

There is a clear distinction between the level of care being received by an individual for the different use classes.

Given the particular specialist form of accommodation required to meet the definition of C2 use class it is important that this comes forward separately to general C3 use classes which cater for general housing needs as established in the SHMA.

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]

No comments.

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?

---

1See in particular “Changes to Planning Regulations for Dwelling Houses and Houses in Multiple Occupation”, CLG Circular 8/2010.
Yes. RBC should look to front-load delivery to ensure that the shortfall is met within five years of adoption, in line with paragraph 47 of the NPPF (2012) which states that [emphasis added]:

‘To boost significantly the supply of housing, local planning authorities should:

• …identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land…’

Planning Practice Guidance (“PPG”), paragraph: 037 Reference ID: 3-037-20180913, states that [emphasis added]:

To ensure that there is a realistic prospect of achieving the planned level of housing supply, the strategic policy-making authority should bring forward additional sites from later in the plan period, over and above the level indicated by the strategic policy requirement, and any shortfall, or where applicable the local housing need figure. These sites will provide additional flexibility and more certainty that authorities will be able to demonstrate a sufficient supply of deliverable sites against the housing requirement.

Further, paragraph: 044 Reference ID: 3-044-20180913 of the PPG states that:

The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach).

It is clear that under national policy, RBC need to seek to meet their historic shortfall within the first 5 years of the Local Plan.

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

Yes. RBC has a historic undersupply of housing which, as set out in paragraph 47 of the NPPF (2012), requires a 20% buffer to be added on top of any existing shortfall.

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?

Analysis of the housing trajectory indicates 244 units that are due to be completed between 2018/19 and 2022/23 for which no evidence that they currently have planning permission, or pending applications. A detailed list of these sites is set out in the table below.

<table>
<thead>
<tr>
<th>Site</th>
<th>Total Site Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Webbs, The Green, Englefield Green</td>
<td>14</td>
</tr>
<tr>
<td>CABI, Bakeham Lane, Egham</td>
<td>25</td>
</tr>
</tbody>
</table>
Ongar Hill Brick Works, Ledger Drive, Row Town 12
Alwyn House, Windsor Street, Chertsey 35
Pantiles Nursery, Almners Lane 20
Units 1 & 1a Downside, Chertsey 30
9-11 Victoria Street 10
Coltscroft, Rosemary Lane, Thorpe 24
Land at Howards Lane 6
Brackendene Lodge, Woburn Hill 10
Trys Hill Farm 6
Villa Santa Maria 9
Sandhills and Lyne Lane 11
Barrsbrook and Barrsbrook Cattery 5
Padd Farm 5
18-20 St Georges Road 7
33 Station Road 15
TOTAL 244

Under the Revised NPPF (2018), which the housing land supply will be assessed against despite the Local Plan being assessed against the NPPF (2012), councils must demonstrate with robust evidence that the sites are deliverable.

The Revised NPPF (2018) has strengthened the threshold for sites which can be included as part of 5 year housing land supply calculations. Paragraph 67 of the Revised NPPF (2018) states that [emphasis added]:

'Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, **planning policies should identify a sufficient supply and mix of sites**, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for years one to five of the plan period…'

Footnote 32 of paragraph 67 is as follows [emphasis added]:

'With an appropriate buffer, as set out in paragraph 73. **See glossary for definitions of deliverable and developable.**'

Within the glossary, deliverable is defined as [emphasis added]:

'To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). **Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.**'
It therefore follows that RBC should not include these 244 units within their current five year housing land supply and thus the delivery rates for these sites should be revised, or if they do then further detailed information is required to evidence their delivery.

The housing trajectory for Longcross Garden Village is set out below. It highlights a significant increase in completion rates from 2018/19 onwards.

<table>
<thead>
<tr>
<th>Monitoring Year/Site</th>
<th>Longcross Garden Village</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017-18</td>
<td>72 units</td>
</tr>
<tr>
<td>2018-19</td>
<td>36 units</td>
</tr>
<tr>
<td>2019-20</td>
<td>90 units</td>
</tr>
<tr>
<td>2020-21</td>
<td>150 units</td>
</tr>
<tr>
<td>2021-22</td>
<td>200 units</td>
</tr>
<tr>
<td>2022-23</td>
<td>150 units</td>
</tr>
<tr>
<td>2023-24</td>
<td>150 units</td>
</tr>
<tr>
<td>2024-25</td>
<td>150 units</td>
</tr>
<tr>
<td>2025-26</td>
<td>150 units</td>
</tr>
<tr>
<td>2026-27</td>
<td>150 units</td>
</tr>
<tr>
<td>2027-28</td>
<td>150 units</td>
</tr>
<tr>
<td>2028-29</td>
<td>150 units</td>
</tr>
<tr>
<td>2029-30</td>
<td>120 units</td>
</tr>
</tbody>
</table>

At present, planning permission has been granted for 200 units with an additional 200 units currently being determined. The housing trajectory indicates that 198 units will be built between 2017/18 and 2019/20. A further 150 units are expected to be delivered in 2020/21 and 200 units in 2021/22. This represents a tight turn around for the granting of planning permission to construction and completion for the additional 200 units. RBC should provide more evidence to indicate how the granting of planning permissions aims to keep up with the trajectory.

As set out in previous submissions, many allocations in the Local Plan are dependent on mitigation to the A320. RBC, Surrey County Council and Highways England have yet to come to an agreement on the impacts of the Plan on the A320 and the Strategic Road Network. Discussions on the implications on the Plan are due to be held at a later date, as yet not confirmed. The longer it takes for these parties to come to an agreement, the greater the delays to the delivery of units of sites reliant on the A320 improvements. It is therefore more important than ever for RBC to include allocations for sites which do not rely so heavily on the A320 and sites that can deliver early in the Plan period.

Another factor regarding the delivery of housing is the Housing Delivery Test. Paragraph 73 of the Revised NPPF (2018) states that [emphasis added]:

…the supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

a) 5% to ensure choice and competition in the market for land; or

b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan\(^\text{38}\), to account for any fluctuations in the market during that year; or
c) **20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply**

Footnote 39 is as follows [emphasis added]:

*From November 2018, this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.*

Finally, paragraph 215 of Annex 1 sets out what constitutes 'substantially below' the housing requirement is [emphasis added].

a) November 2018 indicate that delivery was below **25%** of housing required over the previous three years;

b) November 2019 indicate that delivery was below **45%** of housing required over the previous three years;

c) November 2020 and in subsequent years indicate that delivery was below **75%** of housing required over the previous three years.

The table below sets out RBC’s expected delivery rates for the last 5 years of the Plan period.

<table>
<thead>
<tr>
<th>3 year Time Period Assessed</th>
<th>Expected Supply</th>
<th>Requirement</th>
<th>Supply/Requirement</th>
<th>Delivery</th>
</tr>
</thead>
<tbody>
<tr>
<td>2023/24 to 2025/26</td>
<td>(549 + 429 + 378) = 1,256</td>
<td>(498 x 3) = 1,494</td>
<td>(1,256/1,493) x 100</td>
<td>90%</td>
</tr>
<tr>
<td>2024/25 to 2026/27</td>
<td>(429 + 378 + 291) = 1,098</td>
<td>(498 x 3) = 1,494</td>
<td>(1,098/1,493) x 100</td>
<td>74%</td>
</tr>
<tr>
<td>2025/26 to 2027/28</td>
<td>(378 + 291 + 286) = 955</td>
<td>(498 x 3) = 1,494</td>
<td>(955/1,493) x 100</td>
<td>64%</td>
</tr>
<tr>
<td>2026/27 to 2028/29</td>
<td>(291 + 286 + 263) = 840</td>
<td>(498 x 3) = 1,494</td>
<td>(840/1,493) x 100</td>
<td>56%</td>
</tr>
<tr>
<td>2027/28 to 2029/30</td>
<td>(286 + 263 + 157) = 706</td>
<td>(498 x 3) = 1,494</td>
<td>(706/1,493) x 100</td>
<td>47%</td>
</tr>
</tbody>
</table>

RBC will not be delivering 75% of its housing requirement as set out in paragraph 215 of Annex 1 and paragraph 73 (c) of the Revised NPPF (2018) for the final four years of the Plan period. RBC will therefore be delivering substantially below their housing requirement and thus will require a 20% buffer.

The question which therefore must be asked is; it is appropriate for an inspector to find a plan sound which would fail the Housing Delivery Test in future years?

Paragraph 75 of the Revised NPPF (2018) states that [emphasis added]:

*To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, the authority should prepare an action plan in line*
with national planning guidance, to assess the causes of underdelivery and identify actions to increase delivery in future years.

RBC will also have to prepare an action plan as required by paragraph 75 from 2025/26 onwards as delivery rates will have slipped below 95% (Paragraph : 062 Reference ID: 3-062-20180913 of the PPG.

8.3 Does the Plan provide sufficient information about the housing implementation strategy? Should it include a housing trajectory in graphical and tabular forms?

At present, the housing trajectory is difficult to read. It is not clear which sites correspond to which site allocation. It is recommended that the site allocation reference numbers are included in the table. Further, with respect to the Revised NPPF (2018), it would be useful for RBC to include which sites have full planning permission, which have outline planning permission, which are yet to be determined and which are under construction.

Additionally, '81-87a Woodham Park Road' does not appear to have any capacity allocated to it, or when units would be delivered.

CONCLUSION

As set out in these statements, it is believed that due to significant gaps in the evidence base and a lack of agreement over highway improvements, there is not enough evidence to suggest that the Plan should be found sound in its current form. We would suggest that there are a number of modifications that can be made by the council in order to make the plan fully sound and positively prepared. We hope that these comments are taken into consideration by the inspector at the examination.

By way of this letter I would like to confirm our intention to appear at the hearings on 6, 7 and 19 February 2019 regarding the two matters. My colleague Andy Black and myself will be speaking. Should you require any additional information then please do not hesitate to contact me.

Yours sincerely,

Lucy Morris
Planner