Dear Sir/ Madam,

RE: COMMENTS ON RUNNYMEDE 2030 LOCAL PLAN MAIN MODIFICATIONS BY KITEWOOD

Kitewood welcomes the opportunity to comment on the draft Main Modifications which are being consulted on by Runnymede Borough Council in relation to the Local Plan. Kitewood has attended a number of sessions of the Examination and has previously submitted statements on matters 1, 2, 3, 4 and the stage 3 hearing relating to highway issues.

At the outset Kitewood would find it helpful to receive clarification from the Inspector as to the point which has now been reached with the Local Plan Examination. That is because during the debate at the Examination hearings on various matters, considerable doubt has been expressed about the delivery of suitable levels of housing to meet the OAN figure (and indeed the OAN itself). With the particular doubts over the delivery of the improvements on the A320 corridor (with implications on the M25 junction 11) to enable the housing allocation to be delivered and thus maintain the projected rates of delivery. The Local Plan process was effectively suspended to allow further information to be submitted on this matter. Given the doubts about delivery – which in Kitewood’s view remain – various parties put forward the importance of the Council having a ‘plan B’, or at least a ‘flexible plan A’ relating to the provision of housing land. This flexibility or plan B could include the potential for the allocation of reserved housing sites; the consideration of safeguarded land excluded from the Green Belt or simply the allocation of additional sites for housing that do not rely on a series of A320 corridor improvements to be implemented before homes can be built.

It was understood the Inspector was going to consider those submissions and express a view on that issue because it clearly goes to the heart of the soundness of the Local Plan. The Inspector therefore is, with respect, requested to clarify her position on that matter and when such an opinion is going to be expressed. It is Kitewood’s view that the Main Modifications – whilst seeking to address certain issues identified – are being prepared in a scenario whereby the Local Plan as a whole is not soundly dealing with the need to deliver, with reasonable certainty, the scale of housing land which is required in the Plan period. The Council’s position of falling back on the Government requirement to carry out a review of the Plan after five years does not obviate the need to have a Plan which is sound over a period of circa fifteen years with a Green Belt boundary that is capable of enduring beyond the Plan period.
Kitewood is reminded that almost a year ago the Council’s legal representative addressed the Examination on the basis that ‘agreement had been reached’ with Highways England in relation to the A320 and the relevant implications on the M25. That clearly was not the case and Kitewood has considerable doubts that the strategy for the Plan can and will actually deliver housing and provide a revised Green Belt boundary which is defensible in the long term. These are key elements of the Local Plan process which should not be left to another day in the context of the Government aspiration to significantly boost the supply of homes in the right areas. Kitewood agrees that it would be preferable, given the priority on the production of Local Plans, for Runnymede BC to have a sound Local Plan moving forward. However, there remains considerable uncertainty on this matter in Kitewood’s view, hence it would be helpful for the Inspector to set out her opinion about these ‘high level’ issues.

In that context, Kitewood’s comments on the Main Modifications are set out below.

**MM7**

Kitewood is concerned about the implications of the Plan period being shortened to 2030 and the apparent reliance that the Council is placing on a review process to bring forward housing land to meet any shortfalls within that period. Without wishing to rehearse the points made above, the revised Green Belt boundaries should be capable of enduring beyond the Plan period and one of the key purposes of a sound Local Plan is the adequate provision of housing land in accordance with the NPPF. Since the 2012 NPPF further material has been published by the Government on the housing delivery test. The importance of delivering a significant boost to housing land supplies throughout the country has been underlined by various Ministerial statements. Given doubts still exist about a number of the main allocated sites – relating to the rate of delivery of housing in parallel with the A320 improvements, Kitewood is concerned that the Plan is simply not sound on the basis of delivery, nor does it take a positive approach and fully exploit the opportunity to produce a robust plan to provide a safety net of additional land for housing. This would take the form of either safeguarded land in the Green Belt, the allocation of reserved housing sites or the allocation of new sites for housing.

**MM9**

The modified figures in MM9 for the provision of housing land suggests that the overall supply that will be delivered through the Local Plan will be 7,920 dwellings. This compares to an OAN generated requirement of 7,507 dwellings. The assumptions behind the delivery figures have been tested at the Examination. Kitewood’s view is that the Council’s figures on delivery are extremely optimistic and, in any event, there is only a 5.5% ‘buffer’ of over-allocation between housing the Council says is to be delivered and the OAN. Kitewood do not consider this to be a positive approach to plan-making and this limited buffer should, again, result in the Council being recommended to consider the allocation of either safeguarded land in the Green Belt, the allocation of reserved housing sites or the allocation of new sites for housing.

**MM12**

Kitewood note the wording of MM12 which sets out the position as discussed on this matter at the Examination. However, in Kitewood’s view there should be absolute clarity within the wording of MM12 as to how many dwellings as a proportion of the overall supply (the 7,920 dwelling figure) are actually affected by the A320 improvements or related works on the M25. That figure should be included somewhere within the Main Modifications. Kitewood are also of the view that absolute clarity is needed in regard to how the Council anticipate that these works will be delivered in a
comprehensive and coordinated manner by the individual site promoters to avoid the potential fragmentation of works that do not provide a co-ordinated and deliverable solution.

**MM13**

Kitewood remains of the view that the allocation of housing and employment land that the Spatial Strategy promotes does not reflect the outcome of the work done on the evidence base. This was explained in Kitewood’s statement on matter 3. It particularly relates to the lack of allocation for housing land in the New Haw area which is regarded as one of the most sustainable locations from the Council’s evidence documents. It also relates to the fact that the largest allocation for new employment development – some 20,000 sq.m. – is at New Haw. Kitewood’s view is that further housing land should be identified either through safeguarded land; reserved housing sites or new allocations. If that process takes place, then the New Haw area should be a leading candidate for additional housing development. In this context, the site which Kitewood has put forward at Wey Manor Farm (see masterplan in Kitewood’s statement on matter 3) which is not restricted by a A320 corridor improvements should be considered for allocation now.

**MM14**

The same point relating to MM13 can be made in relation to MM14 and Policy SD2. This notes that the Woodham and New Haw area receives only 123 new dwellings within the Plan period; however, some 20,000 sq.m. of B1c/B8 development. Given the sustainability of the area the balance between housing and employment in this part of the district is unsound.

**MM15**

Kitewood again comments that the weaknesses in the Spatial Development Strategy follow through from earlier modifications into MM15.

**MM17**

In relation to housing land supply, the Council seems to acknowledge in MM17 that there is currently a five year shortfall in housing land provision against the OAN and this will be resolved over time – particularly when the A320 related sites are delivered. It appears to be the shortfall – on the Council’s figures – will last approximately four years. In Kitewood’s view this position is not acceptable for a newly adopted Local Plan. To resolve this issue – and to provide a greater buffer of housing land delivery against the OAN figure (see MM9 above) – the Council should be recommended to find additional housing sites in sustainable locations – whether in the Green Belt or not – to make up a short term shortfall. The sites identified should be deliverable within this period and not subject to any over-riding infrastructure delays. In this regard the site identified by Kitewood in its representations at New Haw – see masterplan attached to matter 3 statement – is a deliverable site within the early years of the Plan period which could help address the short term delivery issues the Plan has as well as provide a contribution to the additional ‘buffer’ which Kitewood considers is required.

We trust these comments are of assistance and they are matters which have to a great extent already been raised by Kitewood and others during the Examination process. The proposed Main Modifications are a reflection of the Council’s position as it has evolved at the Examination. As set out in the introduction to this letter, it does not appear the Inspector has expressed a view about the soundness of this.
Kitewood would welcome the opportunity to continue to participate in the Examination as matters progress.

Yours sincerely,

KITEWOOD ESTATES LTD