

Home Builders Federation

Matter 7

RUNNYMEDE LOCAL PLAN EXAMINATION

Matter 7: Detailed Policies for Housing (Policies SL19, SL20, SL22-SL24 and supporting text)

7.1 Are the minimum space standards set out in Policy SL19 justified by the local evidence?

Planning Practice Guidance (PPG) outlines that the application of the nationally described space standards (NDSS) must be based on the need for their application within the location they are to be applied. Where such a need is identified, justification is then required to ensure the impacts of adopting space standards on meeting local housing needs, can be properly assessed. The approach taken by the Council in assessing the need for internal space standards is set out in SD006a. This indicates that whilst there have been units developed below the national described space standard this situation is not at all common with averages sizes being above current standards. The Council have also examined specific examples of schemes that were identified by officers as being potentially below space standards. It is worth noting that this process identified just four development schemes and just 27 units below space standards and as such does not indicate that Runnymede is an area suffering from the development of overly small new homes.

The application of the NDSS must be seen as must have not a nice to have and that its application limits the flexibility that is required to viably deliver some sites. In particular it could impact on previously developed land in the urban area where, in order to achieve a viable development, space standards may in some circumstances need to be smaller than those set out in the NDSS. This could impact on the number of smaller less expensive units being provided on PDL with such sites being developed at lower densities but higher values in order to ensure a viable development. Given that such considerations are required to form part of the Council's justification we do not consider the Council's adoption of internal space standards to be justified.

In summary we do not consider the evidence indicates that there is a need for internal space standards in Runnymede. The majority of homes are built to minimum standards and their application will reduce the flexibility of the development industry to deliver



more challenging sites where meeting space standards on all homes would compromise viability.

Recommendation

That the requirement to meet NDSS be deleted.

7.2 With regard to the overall mix of dwellings, is Policy SL19 justified and likely to be effective in requiring provision that is generally in accordance with the Strategic Housing Market Assessment or any similar evidence? Is the predominant need in new market housing for two- and three-bedroom dwellings likely to be addressed by the Plan's allocations?

The type of home that is needed will not only vary across areas within a local authority area but also across the period of a local plan. The SHMA can only ever provide a snap shot in time as to what is needed and as such it is essential that there is sufficient flexibility for the house building industry to develop sites to deliver the homes that are needed in that location at that point in time. The approach taken by the Council in SL19 provides a degree of flexibility and we support the decision to limit the level of prescription in relation to housing mix.

7.3 Is the estimated annual affordable housing need of 471 dwellings and the 80:20 tenure split (affordable rent/social rent: other forms of affordable housing) robust? In this light, and taking account of the market signals adjustment and the viability evidence, is the Policy SL20 target of 35% affordable housing provision from market schemes justified and likely to be achieved?

We have some concerns regarding the approach taken to the viability assessment and its failure to consider in full the financial impacts of the Council's policies on development in the Borough. The NPPF and PPG are clear that the full cumulative impacts of the policies in a local plan should be considered when preparing its local plan. However, within the Council's viability assessment it appears that the only costs considered are those for the affordable housing policy, Thames Basin Heaths mitigation strategy and a relatively small amount for all S106 costs. The impact of the policy requirements with regard to sustainable design and accessible homes (SD8), self and custom build housing (SL24), open space (SL26), and net gains in biodiversity (EE9) do not appear to have been considered in any detail and an assessment made as to the cost of these policies on development. The assumption that has been made by the Council that there will be sufficient headroom to take account of all these additional costs. However, without any assessment as to the what these costs are and their impact within the study it is impossible to make such a judgement.

The Council's viability assessment has assumed that all policy costs will be taken into account when purchasing land and that as such the benchmark land value will be considerably lower. To some extent this will be the case. However, it will also be the case that if existing use values are higher than, or equal to, this adjusted land value then there will be no incentive for the land to come forward as residential development.

In order for land to come forward for development that needs to be some incentive to the land owner to sell that land. This incentive is recognised by Government in the latest PPG through the adoption of the '*existing use value plus*' approach it has adopted in relation to its guidance on whole plan viability assessment. So, whilst here may be circumstances where land values can be reduced to reflect additional costs there may also be scenarios where potential sites for residential development will not come forward. Given that Runnymede's local plan relies on the maximisation of development in its urban areas, where EUVs are likely to be highest, it is important that the Council is certain that its policies will not compromise delivery of these sites.

Given the limitations of the viability evidence in considering cumulative policy costs the Council cannot be certain as to whether all development will be able to support the 35% affordable housing requirement and all the other policies costs that are being placed on residential developments. It is not known by the Council whether these costs will make developments unviable or push development to the margins of viability and remove the necessary buffer to respond to changing markets as is required by paragraph 10-008-20140302 of PPG. Without this evidence the Council cannot justify untested policy requirements in the local plan to be certain that the requirements of SL20 are achievable.

Recommendation

If SL20 is to be considered achievable the Council should remove any untested policy requirements in the local plan.

7.4 How will the overall 30% target in Policy SL20 be achieved over the Plan period? Can this be demonstrated in an affordable housing trajectory in the Plan?

No comment

7.5 Would it be justified and effective for development management purposes to update references to affordable housing so that they are more closely aligned with definitions in NPPF 2018?

For the sake of clarity for the applicant and decision maker we would support alignment with the definitions set out in the 2018 NPPF.

7.6 With regard to Policy SL22, what is the current balance between the identified need for Gypsy and Traveller accommodation and the existing and planned supply for the period to 2023/2024 and to 2030? To what extent is this figure dependent on authorised sites being returned to occupation by households that meet the planning definition? What is the potential for modest expansions of authorised sites and redevelopment of previously developed land to assist in meeting Gypsy and Traveller needs? How will the Council seek to address any unmet needs including for transit sites over the Plan period?

No comment

7.7 In relation to Gypsy and Traveller households that do not meet the planning definition, and taking account of the Council's evidence in RBCLP-02, can it be demonstrated that their housing needs have been assessed and will be provided for within the Plan period?

No comment

7.8 How will the unmet need for Travelling Showpeople accommodation be addressed within the Plan period? Is it sufficient to rely on the criteria in Policy SL22? Are there other measures that should be taken in order to meet any shortfall?

No comment

7.9 Taken together with other relevant policies in the Plan, will Policy SL23 and SD8 help to ensure that the accommodation needs of the elderly and those with particular needs will be addressed over the Plan period? Also, does Policy SL23 provide a positive and effective framework to meet the need for student accommodation? Is the Plan's approach consistent with the evidence of these types of housing need?

We do not consider the Council to have justified the need for all new homes on developments of over 1ha to be compliant with part M4(2) and 5% to be compliant with part M4(3). PPG establishes that this should be based on both an assessment of the need for such homes and a consideration as to the impact on the viability of development of its application.

There is limited evidence presented by the Council as to whether the policy is justified with regard to the need for all homes on sites of 1 ha or more to be built to part M4(2). The Council state in the local plan that there is an ageing population supports to proposed policy. However, the Council's evidence base shows in table 77 at paragraph 7.21 that the number of older people with a mobility problem, and as such would benefit from a more accessible home, make up just over 4% of the total population. This suggests that only a relatively small proportion of the new homes provided will be adapted in future. It is not clear from the Council's evidence how many homes would be built to part M4(2) as a result of the Council's policy but it would appear to deliver significantly above the level that is likely to be needed across the Borough as a whole.

Paragraph 173 of the NPPF requires Councils to consider the impact of all policies likely to have a cost implication on the viability of development. PPG reiterates this position in paragraph 10-013 the requirement for Councils to consider the cumulative costs of all policies in the local plan – which would include the optional technical standards. As stated above the Council's evidence on viability suggests that there is sufficient headroom but given that no assessment has been made as to the cumulative impact of the policies in the local plan other than for affordable housing, Thames Basin

Heaths Mitigation and S106 contributions there can be no certainty attached to this statement. Without this key element of the evidence required to support the adoption of the optional accessibility standards the policy has not been justified and should not be included in the local plan.

Recommendation

Without the necessary justification required by PPG paragraph f of policy SD8 should be deleted from the plan.

7.10 Are the site-size threshold and other requirements for self- and custom-build housing as set out in Policy SL24 justified and likely to be effective?

We could not find any evidence as to the demand for self-build and custom housebuilding plots within Runnymede nor the number of plots that this policy will deliver. As such there is no evidence to support the threshold set out in SL24. Without this justification we would suggest the policy is reworded to encourage the delivery of such plots through negotiation with landowners. Such an approach would also be more consistent with the approach to self-build homes set out in paragraph 57-025 of PPG.

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