

Agenda Item IMD6

INDIVIDUAL EXECUTIVE MEMBER DECISION REFERENCE IMD 2018 8

TITLE	Wokingham Borough Council response to the Runnymede Draft Local Plan 2030 consultation
DECISION TO BE MADE BY	Executive Member for Strategic Planning and Highways, Councillor David Lee
DATE AND TIME	Thursday 1 March 2018 – 9am
WARD	None specific
DIRECTOR	Interim Director of Environment, Josie Wragg; Director of Corporate Services, Graham Ebers

OUTCOME / BENEFITS TO THE COMMUNITY

To ensure that the Runnymede Draft Local Plan 2030 has minimal negative impacts upon Wokingham Borough and that any positive benefits are maximised.

RECOMMENDATION

The Executive Member for Strategic Planning and Highways agrees that Wokingham Borough Council:

- a) Welcomes the additional work undertaken by Runnymede Borough Council to try to meet its housing need;
- b) Lodges a holding objection to Runnymede Borough Council's Draft Local Plan 2030 (Regulation 19) until such time as RBC demonstrate that housing needs arising from the borough can be met in full.

SUMMARY OF REPORT

Runnymede Borough Council (RBC) has published their Draft Local Plan 2030, which is intended to be the last version of the plan where representations can be made (under Regulation 19) before it is submitted to the Secretary of State for examination.

Since the consultation on the Local Plan in summer 2017, RBC has amended proposals relating to both the provision of housing over the Plan period and the preferred approach for the spatial strategy, in order to meet 99% of housing need across the plan period.

Background

In summer 2016, Runnymede Borough Council (RBC) published a Local Plan Issues, Options and Preferred Approaches consultation (Regulation 18). RBC's preferred approach was to meet between just 56% and 82% of its proportion of the Objectively Assessed Need (OAN) for Housing.

In response to this consultation a number of Duty to Cooperate bodies and interested parties, including Wokingham Borough Council (WBC) raised concern that

RBC was proposing a housing target that fell well short of the proportion of the OAN for housing. WBC requested that RBC reconsider its preferred approach to its spatial strategy, and work to ensure that it could accommodate its housing need within the housing market area, to potentially avoid putting further strain on neighbouring authorities to accommodate any unmet housing need. There was no commitment from Local Authorities in the surrounding area to assist in meeting RBC's unmet need.

RBC published its Local Plan 2035: Additional Sites and Options (Regulation 18) in summer 2017. In this consultation, RBC acknowledged the need for increased housing delivery within their borough with the consultation material suggesting this would be achieved through:

- A reassessment of the capacity of the preferred site allocations
- The inclusion of further site allocations in the Local Plan
- The adjustment of several assumptions factored in to the Council's evidence base relating to housing supply.

Notwithstanding these actions, it remained unclear from the consultation material whether RBC would be able to meet its housing need. The consultation material contained no commitment to the housing needs of both RBC and Spelthorne Borough Council (both authorities constituting a single Housing Market Area) being addressed. WBC expressed strong concerns that the housing needs across the wider HMA were not addressed in full and raised a holding objection on this basis.

Analysis of Issues

Housing Need

In paragraph 5.3 of the draft Local Plan, RBC explain that feedback from other Local Planning Authorities in response to the Regulation 18 consultation revealed that neighbouring authorities were not in a position to contribute towards meeting RBC's unmet housing need. RBC's 2018 Strategic Land Availability Assessment (SLAA) further states that there is no scope for bringing forward further suitable, available and achievable sites within the urban area. Whilst RBC did consider whether this shortfall should be met through further releases of land from the Green Belt, they decided against this.

As part of the period where representations can be made on the draft Local Plan (under Regulation 19), RBC has amended its spatial strategy in a number of ways to address concerns raised by Duty to Cooperate partners and to enable RBC to meet at least 99% of its identified housing need.

Reducing the Local Plan period

RBC had previously proposed that the Local Plan would cover a 20 year period from 2015-2035, however this has been reduced and RBC are now proposing that the Local Plan will cover a 15 year period, ending in 2030. RBC state this is in accordance with the National Planning Policy Framework (NPPF) (2012) which sets out that Local Plans should be drawn up over an appropriate time scale, preferably a

15-year time horizon. RBC state this has helped reduce the unmet level of housing need in the Borough between 2030 and 2035 as the inability to identify suitable development sites this far ahead was increasing the shortfall across the whole Plan period.

The Local Plan, once adopted, will be reviewed after 5 years, by which time it is anticipated that Spelthorne Borough Council's Local Plan will be further progressed. This will provide greater certainty about the level of development Spelthorne can deliver through its Local Plan, and Runnymede will have had additional time to seek to resolve any issues associated with the redistribution of unmet development need outside the Borough in the longer term, if any such issues are found to exist.

Updated SHMA document

RBC and Spelthorne Borough Council published a SHMA in 2015 which covered a period from 2013 to 2033. The SHMA identified that within the HMA, there was a need for between 1,018 and 1,292 dwellings per annum (dpa) to be delivered between 2013 and 2033. The housing need apportioned to Runnymede was between 466 and 535 dpa and Spelthorne Borough's need was between 552-757 dpa.

In 2017, RBC commissioned a partial update of the Runnymede-Spelthorne SHMA to support the consultation on its draft Local Plan looking at the period of 2016-30. This was published in January 2018. The 'addendum to the SHMA' uses the new 2014-based official population and household projections and more up to date house price and affordability data, as well as more recent economic forecasts. The level of identified housing need in Runnymede reduced from 535dpa to 498dpa.

C2 development (residential institutions)

Following discussions with their legal advisor, RBC have amended some previous assumptions regarding housing land supply calculations. One of these amendments is that RBC are now counting C2 (Residential institutions) development towards their housing requirement based on the amount of accommodation it releases back into the housing market. RBC state this is based on evidence that has been collected following engagement with specialist providers who provide care for older people in Runnymede. RBC have applied a 3:1 ratio so that for every 3 bedspaces in a C2 development for older people, it is assumed that one C3 dwelling is released back to the market.

WBC has concerns with this assumption given the limited amount of evidence that has been provided as justification. It is also unclear whether the ratio takes into account in-migration from other boroughs which would thereby reduce the number of homes freed up within Runnymede. In addition, to the knowledge of WBC, this unusual approach is not being applied by any other Local Planning Authorities when calculating housing land supply. It is therefore not considered that a robust basis for this approach has been provided, which, if not accepted by a Planning Inspector at examination, will result in a reduction in housing land supply.

Conclusion

WBC recognize that RBC has taken a number of steps to try to meet its housing need in full through the Draft Local Plan 2030. WBC note that RBC expects there to be a housing shortfall of 94 dwellings across the plan period. WBC would advise RBC to look at ways of increasing housing densities on every suitable site expected to be delivered in the plan period in order to try to eliminate the deficit within the Borough and met the housing need in full. WBC would also advise RBC to look again at their windfall estimates.

WBC continues to lodge a holding objection to Runnymede Borough Council's Draft Local Plan 2030 (Regulation 19) until such time as RBC clearly demonstrate that their full housing needs are being met.

WBC continues to welcome further engagement with RBC as the Local Plan 2030 progresses.

FINANCIAL IMPLICATIONS OF THE RECOMMENDATION

The Council faces severe financial challenges over the coming years as a result of the austerity measures implemented by the Government and subsequent reductions to public sector funding. It is estimated that Wokingham Borough Council will be required to make budget reductions in excess of £20m over the next three years and all Executive decisions should be made in this context.

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	Nil	Nil	Nil
Next Financial Year (Year 2)	Nil	Nil	Nil
Following Financial Year (Year 3)	Nil	Nil	Nil

Other financial information relevant to the Recommendation/Decision

None anticipated

Cross-Council Implications

Decisions in RBC regarding meeting housing needs may lead to unmet housing need across the wider HMA. This could affect the housing targets of other neighbouring local authorities, and potentially WBC.

SUMMARY OF CONSULTATION RESPONSES

Director of Corporate Services	No response received
Monitoring Officer	No comments
Leader of the Council	No response received

Reasons for considering the report in Part 2

n/a

List of Background Papers

Information published by Runnymede Borough Council relating to the Draft Local Plan – see https://www.runnymede.gov.uk/localplanconsultation

Contact Heather Read

Service Development Policy and Planning
--

Telephone No 0118 974 6453

Email heather.read@wokingham.gov.uk

Date 24/01/2018

Version No. 3

This page is intentionally left blank