



RICHMOND UPON THAMES BOROUGH COUNCIL

Town and Country Planning Act 1990 (as amended)

Planning and Compulsory Purchase Act 2004

**The Town and Country Planning (Determination by Inspectors)
(Inquiries Procedure) (England) Rules 2000 (as amended)**

REBUTTAL PROOF OF EVIDENCE

JOANNE CAPPER BSc (Hons) DIPTP MRTPI CIHM

on behalf of London Borough of Richmond upon Thames

Site: Arlington Works, 23-27 Arlington Road, Twickenham, TW1 2BB

PINS Ref: APP/L5810/W/20/3249153

LPA Ref: 18/2714/FUL

1.0 QUALIFICATIONS AND EXPERIENCE

- 1.1 I graduated with a BSc (Hons) in City & Regional Planning in 1999 and a Diploma (Distinction) in Town Planning in June 2001 from Cardiff University. I became a chartered member of the Royal Town Planning Institute (RTPI) in 2002. I am also a member of the Chartered Institute of Housing.
- 1.2 I have extensive experience over 20 years in planning policy in local government, previously working for LB Merton, LB Brent and Reigate & Banstead Borough Council. I have worked in planning policy for the London Borough of Richmond upon Thames since 2009. I presently hold the post of Principal Planner Policy (Richmond) and lead on the preparation of the Council's Local Plan including on housing policies.
- 1.3 The evidence that I have prepared and provide for this appeal is true. It has been prepared, and is given, in accordance with the guidance of the RTPI. I confirm that the opinions expressed are my true and professional opinions.

2.0 INTRODUCTION

- 2.1 This rebuttal has been prepared to respond to information set out in the Proof of Evidence of Michael Wood MRTPI. This further supplements the evidence set out in the Proof of Evidence of Scott Davidson MRTPI, which outlined that the Appellant had provided insufficient detail regarding their consideration of a shortfall in the effective five-year housing land supply for Richmond, despite requests by the Council and the Inspector. This rebuttal is only detailing such matters of detail to avoid key time being taken up at the Inquiry and is not a rebuttal of all of the points in the Proof of Evidence of Michael Wood MRTPI which can be dealt with as part of the round table session.

3.0 REBUTTAL

- 3.1 The following table sets out the Council's response to the comments set out in the Proof of Evidence of Michael Wood MRTPI, noting any implications for the Council's five year housing land supply as set out in The Monitoring Report - Housing - 2019/20 and accompanying tables (CDE5).

Proof of Evidence of Michael Wood MRTPI	Council's comments	Implication for the 5YHLS
<p>6.6. In June 2020 the Secretary of State (SoS) has clarified this position in East Northamptonshire Council v Secretary of State for Housing, and Local Government. Case Number: CO/917/2020, the SoS consented to quashing of an appeal decision on the basis of an incorrect approach to this interpretation. In the Statement of Reasons attached to the Consent Order, the SoS confirmed:</p> <p>"The proper interpretation of the definition is that any site which can be shown to 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' will meet the definition; and that the examples given in categories (a) and (b) are not exhaustive of all the categories of site which are capable of meeting that definition. Whether a site does or does not meet the definition is a matter of planning judgment on the evidence available."</p>	<p>Agree that categories (a) and (b) are not a closed list. In addition, in June 2020 the Secretary of State clarified the position in the Recovered appeal: land to the east of Newport Road and to the east and west of Cranfield Road, Woburn Sands (ref: 3169314), where the SoS also agreed with the Inspector that it is acceptable that the evidence can post-date the base date provided that it is used to support sites identified as deliverable.</p>	<p>No consequence</p>
<p>Deliverable sites with full planning permission</p> <p>6.10. The AMR supply includes 108 sites that are currently under-construction delivering a net total of 552 dwellings. Of this supply we only contest the numbers included in the AMR of one of these sites which we believe have been mis-calculated.</p> <p>Application ref 14/3011/FUL is shown as delivering a net increase of five dwellings to the council's supply, however, the permission is for the creation of six proposed flats replacing seven existing (Document 12) so this figure should actually be net minus one. Reducing the supply from this source by seven dwellings.</p>	<p>There is no mis-calculation in relation to 14/3011/FUL. The existing property is correctly recorded as it is a House in Multiple Occupation (HMO) and it was a vacant property.</p> <p>14/3011/FUL - 2 Broad Street, Teddington</p> <p>The property was Licenced under the Housing Act 2006 as a HMO requiring a licence. The licence was issued for 8 people (max) to reside in the property and this began in August 2008 and ran until 08/08/2013. Following the expiry of the licence and communication with the owners and landlords, a revisit occurred on 11/03/14 – the property was empty/vacant at this point, so no licence was required.</p> <p>Subsequently, the property was registered as vacant with the Council Tax department between 24/09/17 to 31/07/18</p>	<p>Rejected and no change</p>

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	<p>Furthermore, the Design and Access Statement confirms that: "The property on the site is a three-storey building, fronting Broad Street, with a ground floor shop unit (dry cleaners) and residential (registered Housing of Multiple Occupancy) above. The residential unit has shared facilities across two floors with 7 bedrooms."</p>	
<p>6.11. The next category provided by the AMR is developments with full planning permission that have not started yet (as of the date of publication). The list provided shows 124 such sites delivering a total of 285 homes within the five year period. However, this list includes 14 sites where the planning permission has expired (based on the data provided in the AMR) which cumulatively result in a net supply of 55 dwellings. List provided at Document 13.</p>	<p>The 14 sites listed had not expired at 01/04/2020.</p> <p>Planning permission on 10 of the 14 sites will remain extant until 1 May 2021.</p> <p>Of these 10, 1 has submitted a CIL commencement notice, 1 has submitted an Initial Notice to Building Control, 3 have pending permissions on same site, 2 have subsequent permissions granted, and 2 have subsequent permissions refused</p> <p>The allocated site (SA3 in the Local Plan) with permission for 28 units at the former Police Station, Station Road, Hampton (16/0606/FUL) has subsequently had Details pursuant (construction method statement) approved 09/06/20 which estimates a two year build out period. (16/0606/DD08).</p> <p>The site also has a pending permission (19/2822/FUL) for a registered care home comprising 22 care suites and 67 care units on same site.</p>	<p>Rejected and no change</p>
<p>6.12. Whilst we do consider it appropriate to discount these 55 dwellings as being undeliverable, it is acknowledged that the temporary extension of expiring planning permissions in 2020 to May 2021 means that some of these permission would remain extant until 1 May 2021. Their deliverability in this period, however, should be questioned given they have not commenced on site since 2017.</p>	<p>See the comments above in relation to 6.11 - Initial Notices have been received on some sites and/or pending permissions for increased unit numbers.</p> <p>All sites with full detailed planning permission should be considered deliverable until that permission expires unless there is clear evidence that homes will not be delivered within five years (in accordance with the NPPF definition of deliverable). There is no such evidence and Mr Wood presents none.</p>	<p>Rejected and no change</p>
<p>6.13. In addition to the 14 sites highlighted above, there are a further 21 sites with planning permissions which are due to expire in the next six months of 2021 that have not started. There must be considerable doubt as to whether these sites will</p>	<p>All sites with full detailed planning permission should be considered deliverable until that permission expires unless there is clear evidence that homes will not be delivered within five years (in accordance with the NPPF definition of deliverable). As above, there is no such evidence.</p>	<p>Rejected and no change</p>

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come forward in this period given they have not done so to-date, if these sites failed to commence then there would be a further reduction in the identified supply by 77 dwellings.		
6.16. As of the base-date of 1 April 2020 the supply comprised seven sites all of which did not have planning permission. Since the base-date and the updated AMR three of these sites now benefit from either full or outline planning permission. It is accepted that the two schemes with full planning permission fall within criterion a) of the NPPF definition of "deliverable". However, Barnes Hospital has only been approved in outline and no evidence has been presented to confirm that it will deliver the 83 homes identified within the projected supply within the five year period. Without this evidence, we do not believe it is appropriate for LBRT to account this site towards its 5YHLS position, and the 83 dwellings should be discounted from the supply.	<p>Barnes Hospital is considered a deliverable site. It is Site Allocation SA28 in the Local Plan. Details are set out under 18/3642/OUT. The site is surplus to requirements of the South West London and St George's Mental Health NHS Trust, as part of their Estates Modernisation Programme, with the development to reprovide health care facilities and a Special Educational Needs School on the site along with enabling residential development. S106 signed 09/09/2020. Star Land Realty UK Limited, who are owners and development managers, were signatories to the consented scheme. Granted Permission 14/09/2020. The outline consent includes parameter plans, the mix of units including 18 affordable units, and a Design Code, therefore a deliverable housing scheme has been assessed.</p> <p>There have been 8 TPO applications on site up to March 2020 following the outline application. It is therefore clear that the developer is making preparations for development and is in active discussions regarding the site. There is clear evidence to demonstrate deliverability for 80 units, in accordance with the PPG to demonstrate deliverability (Paragraph 007).</p>	Rejected and no change
6.17. One of the two sites with full permission is the Kew Biothane Plant ref. 18/3310/FUL. This is attributed a supply of 90 homes. However, the permission is only for 88 dwellings (Document 14), therefore, a further two homes should be removed from the identified supply.	Agreed – 88 is correct. Reduction of 2 units.	Accepted and reduced by 2
6.19. The Stag Brewery scheme has been called-in by the Mayor and dates for Representation Hearing sessions have not yet been set, there is no certainty that this scheme will be approved let alone evidence that it could provide 300 homes delivered within the first five year period.	This is Site Allocation SA24 in the Local Plan. The Council resolved to approve applications including up to 813 units for the site in January 2020, which were then called in by the Mayor of London. The GLA concluded that whilst the principle of the redevelopment for a residential-led mixed use development and a school is supported, it has not been demonstrated that the proposals optimise the delivery of affordable housing, and neither has it been satisfactorily demonstrated that the highways impacts of the proposal would be suitably mitigated – therefore it would	Rejected and no change

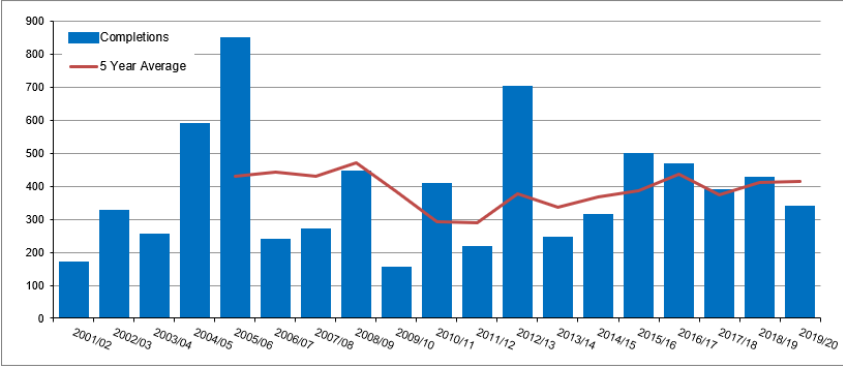
Proof of Evidence of Michael Wood MRTPI	Council's comments	Implication for the 5YHLS
	<p>have a significant impact on the implementation of the London Plan policies on housing and affordable housing supply, and education. A revised mixed use scheme including up to 1250 units (with affordable housing increased from 17% to 30%) has been consulted upon and is due to be considered by the Mayor. The representation hearing due to take place on 26 November 2020 was postponed by the Mayor to allow for further consideration of transport issues in light of the impact of the ongoing closure of Hammersmith Bridge (since August 2020) and the impact a prolonged closure of the bridge would have on the surrounding area with the Mortlake development. This further evidence is considered in accordance with the PPG to demonstrate deliverability (Paragraph 007), as phasing is likely to allow for 300 units within the five year period, which is a small proportion of the total likely sum of housing.</p>	
<p>6.20. The Homebase application has also been called-in by the Mayor and was approved subject to completion of a S106 and draft conditions which remain outstanding.</p> <p>Until such evidence is provided that the scheme can deliver the 80 homes identified, we do not believe it is appropriate for these to be included within the five year supply.</p>	<p>There is clear evidence to demonstrate deliverability for 80 units, in accordance with the PPG (Paragraph 007). The Council's concerns on 19/0510/FUL related to failure to deliver maximum reasonable amount of affordable housing; the design and scale being visually intrusive, dominant and overwhelming; the quality of the proposed accommodation; and the impact on surrounding properties. The application was called in by the Mayor, and revised plans increased the residential-led scheme from 385 units to 453 units. Following the hearing on 1 October 2020 the Mayor decided to grant permission subject to the final conclusion of a S106 legal agreement and final decision notice. The Secretary of State issued a holding direction to the GLA in September 2020, following a letter from the local MP raising objections in relation to design, however progress has continued. Discussions on the S106 are at an advanced stage.</p> <p>Phasing is set out in the Construction management plan) (July 2020) which estimates a three year build out period</p> <ul style="list-style-type: none"> • Phase 1 – Construction of Block C – 99 units (Q1 2022 – Q2 2023) • Phase 2 – Construction of Block D – 90 units (Q2 2022 – Q4 2023) • Phase 3 – Construction of Block B – 50 units (Q3 2022 – Q1 2024) • Phase 4 – Construction of Block A – 146 units (Q4 2022 – Q2 2024) <p>The Monitoring Report - Housing - 2019/20 (CDE5) only allocates 80 units in 2024/25 which is considered a conservative estimate of the housing completions</p>	<p>Rejected and no change</p>

Proof of Evidence of Michael Wood MRTPI	Council's comments	Implication for the 5YHLS
	expected on the site. Given the extent of support for the site, the delivery of a modest number for the site is considered deliverable.	
6.21. The Old Station Forecourt application was submitted in November 2019 and was approved by committee in August 2020 subject to a S106 resolution. This is yet to be signed and agreed and, therefore, a planning permission has not yet been granted. As with the Homebase site, without evidence to demonstrate that this is forthcoming the 46 homes should not currently form part of the 5YHLS.	Site Allocation TW2 in the Twickenham Area Action Plan. A Solum joint venture between Network Rail and Kier (who are currently building out a permission on the station site opposite). The viability report to 19/3616/FUL was based on a 21 month construction period. Discussions on the S106 are advanced and it is due to be completed in January 2021. This further evidence is considered in accordance with the PPG to demonstrate deliverability (Paragraph 007).	Rejected and no change
6.22. Finally, the Kneller Hall Royal Military School of Music site is put forward as a deliverable site allocation for 20 homes. This site does not have full planning permission and no evidence has come forward to suggest that it will be delivered in the next five years. Notwithstanding this, it could be contended that such a development of 20 units would constitute double-counting with the small site trend allocation (see 6.24 below).	This is Site Allocation SA14 in the Local Plan. The Defence Infrastructure Organisation (DIO) acting on behalf of the Ministry of Defence (MoD) confirmed disposal of the site and undertook capacity assessment work which indicated that the site has capacity to accommodate at least 150 homes. The Council and the DIO agreed to work together to set out a future planning framework for the site, securing £150,000 Government funding to produce a SPD. The Kneller Hall Master Plan SPD was adopted by the Council (April 2020) (https://www.richmond.gov.uk/media/18898/kneller_hall_supplementary_planning_document.pdf). The SPD was based on detailed assessment work on heritage assets, transport and trees, and identifies potential for a residential community in the north west corner, which could allow for a phased approach (enabling latter conversion of listed buildings). The project is subject to One Public Estate monitoring, with Government receipts earmarked for 2022/23. The DIO are taking forward the site for disposal and marketing commenced from January 2021, and give vacant possession to the selected purchaser at the end of August 2021. This further evidence is considered in accordance with the PPG to demonstrate deliverability (Paragraph 007) as firm progress with site assessment work.	Rejected and no change

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	This would not be a small site, it would be the first phase of a large site and is considered a conservative estimate of the total amount of housing that can come forward on the site.	
6.23. Given their status without detailed planning permission we do not believe that they should be accounted for within the 5YHLS without detailed evidence to support their deliverability. Accordingly, the 446 dwellings provided by these sites should be discounted until evidence to the contrary is presented.	<p>In accordance with the evidence set out above all of the sites are considered deliverable. This reflects East Northamptonshire District Council v Secretary of State https://cached.offlinehbpl.hbpl.co.uk/NewsAttachments/RLP/CO009192020.pdf "The secretary of state's legal advisers said: "He concedes that he erred in his interpretation of the definition of deliverable within the glossary of the NPPF as a 'closed list.' It is not.</p> <p>"The proper interpretation of the definition is that any site which can be shown to 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 will meet the definition.</p>	Rejected and no change
6.24. The remaining "deliverable sites" supply comes from the small-sites trend which applies a rate of 234 dpa for years three-five of the supply period and reduced rate of 20 for the first two years. We accept that use of this figure is supported by the draft London Plan and do not contest this method given this element of the draft new London Plan has not been objected to by either the Panel of Inspectors or the Secretary of State. It should, however, be noted that the trend of small-sites delivery between 2014-2020 has been 177 dpa (shown by Table 12 sourced from the AMR dataset). The delivery of 234 dpa from this source would, therefore, require a significant uplift against past performance on this metric.	<p>As set out in the Proof of Evidence of Scott Davidson MRTPI (paragraph 4.8), the small sites target of 234 homes per annum has been determined through the preparation of the Publication London Plan, which was subject to Examination and the conclusions of the Panel were made clear and have not been further challenged. The delivery from small sites has fluctuated, it has exceeded 234 dpa in recent years.</p> <p>Further, the small sites figure in the London Plan predated the Government's introduction of further Permitted Development Rights – making it easier to extend certain buildings upwards to increase housing density and the residential redevelopment of vacant and redundant buildings, which are expected to further increase windfalls.</p>	Rejected and no change

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<p>Table 14 – Breakdown of five-year housing land supply</p> <table><tr><th>Year</th><th>Small</th><th>Large</th><th>Total</th><th>% Small</th><th>% Large</th></tr><tr><td>2013/14</td><td>63</td><td>172</td><td>235</td><td>27%</td><td>73%</td></tr><tr><td>2014/15</td><td>238</td><td>66</td><td>304</td><td>78%</td><td>22%</td></tr><tr><td>2015/16</td><td>304</td><td>187</td><td>491</td><td>62%</td><td>38%</td></tr><tr><td>2016/17</td><td>242</td><td>218</td><td>460</td><td>53%</td><td>47%</td></tr><tr><td>2017/18</td><td>165</td><td>217</td><td>382</td><td>43%</td><td>57%</td></tr><tr><td>2018/19</td><td>125</td><td>294</td><td>419</td><td>30%</td><td>70%</td></tr><tr><td>2019/20</td><td>98</td><td>233</td><td>331</td><td>30%</td><td>70%</td></tr><tr><td>Total</td><td>1,235</td><td>1,387</td><td>2,622</td><td>47%</td><td>53%</td></tr><tr><td>Average</td><td>176</td><td>198</td><td>375</td><td>46%</td><td>54%</td></tr></table>	Year	Small	Large	Total	% Small	% Large	2013/14	63	172	235	27%	73%	2014/15	238	66	304	78%	22%	2015/16	304	187	491	62%	38%	2016/17	242	218	460	53%	47%	2017/18	165	217	382	43%	57%	2018/19	125	294	419	30%	70%	2019/20	98	233	331	30%	70%	Total	1,235	1,387	2,622	47%	53%	Average	176	198	375	46%	54%		
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<p>Summary of identified supply</p> <p>6.26. The evidence above indicates that the identified housing supply of 2,219 dwellings per annum should be reduced by a total of 593 dwellings should be removed from the supply. This reduces the total supply from 2,208 identified in the AMR to 1,615.</p>	<p>Overall, as set out above the Council's Monitoring Report - Housing - 2019/20 is considered to set out a robust assessment of future housing land supply. The Council has taken an evidence based approach to assessing deliverability of each site. The corrections set out by the Council above have an overall de minimis impact – the correction to 88 units at Kew Biothane would result in a reduction of 2 units i.e. a revised total of 2,217 (rather than 2,219) to the estimated supply over the five year period.</p>	Reduced by 2																																																												
<p>6.29. Firstly, LBRT has applied a residualised housing target to the 5YHLS calculation based on the oversupply against the policy target in the first five years of the plan (2,084 completions against a minimum requirement of 1,575). The London Plan targets are to be treated as minimum and, as demonstrated in Section 5 of these Proofs, fall well short of meeting the council's housing needs. As such, to apply a residualised approach which effectively reduces the housing target directly conflicts with the NPPF's objective to boost housing land supply and, in this context, is not appropriate.</p>	<p>The residual approach doesn't reduce the housing target; it still applies the full ten-year target set out in the London Plan.</p> <p>Both methods are well established as means of assessing the supply of housing land. The Council is entitled to take this approach. Also see further details below against 6.35 below.</p>																																																													
<p>6.31. The second mistake that seems to have been made in the calculation is that the final five year housing supply assessment (at row j in the table) is tested against the five year requirement figure before</p>	<p>The 5% buffer was only applied to the 'Five year land supply as a percentage of requirement figure' and not the 'Five year land supply expressed in years'. This was made clear in the table.</p>	Rejected and no change.																																																												

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the buffer is applied. The calculation in the table above divides the total supply of 2,208 by the annual requirement of 213 dwellings, which is the requirement without the 5% buffer. This requirement should actually be 224 dpa (Row G above divided by ten).	<p>Row i explicitly details percent of requirement with 5% buffer</p> <p>Row j expresses land supply in years – It is not necessary to provide – the only question is whether the 5 year land supply target has been met - but is used for ease of communication.</p>	
<p>Draft new London Plan</p> <p>6.33. Similarly, the new London Plan calculation above, also contains two key errors. Firstly, the same mistake regarding the application of the 5% noted above is made in this calculation.</p>	Row i explicitly details percent of requirement with 5% buffer	Rejected and no change.
<p>6.34. The other notable error is the application of dealing with undersupply in the calculation. LBRT has noted that based on a single monitoring year of this plan period, there is shortfall of 79 dwellings against the new target of 411 dpa. This shortfall is attributed across the rest of the nine-year plan-period rather than the first five years, this is the application of the 'Liverpool' over the 'Sedgefield' method in dealing with residual shortfall.</p>	<p>Table 16 was included as an illustrative calculation of the situation to acknowledge the anticipated adoption of the Intend to Publish London Plan, in the 2019/20 period incorporating the 2019/20 completions. However, that was not a true requirement at those dates. The undersupply element included in this calculation (for April 2019 – 2020) would not arise; it related to a period covered by the current London Plan requirement which was met in full in that period. With the further delays to the finalisation of the London Plan and assuming the Plan will apply to 2020 – 2030, the revised table below shows a 5.4 year supply and therefore there is no shortfall against the new target.</p> <p>Both methods add previous years' under-supply to the buffer and either expect it to be made up for across the plan period (Liverpool) or in the next five years (Sedgefield). See further details below against 6.35 below.</p>	Rejected and no change
6.35. It is a matter of judgement based on the circumstances of each case as to which is the correct approach to follow, however, given the housing context and circumstances to this case, we consider	The PPG in that context is referring to <i>past</i> shortfalls in housing completions to address under-delivery, which is not considered relevant to Richmond's delivery against targets as there has been no historic shortfall over previous 5 year housing land supply, and the higher housing target in the Publication London Plan is a new	Rejected and no change

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<p>the Liverpool approach followed in the AMR is inappropriate. Notably the PPG at ref Reference ID: 68-031-20190722 firmly supports the use of the Sedgfield method:</p> <p>“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 Sedgfield approach), then the appropriate buffer should be applied. If a strategic policymaking authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the planmaking and examination process rather than on a case by case basis on appeal. Where strategic policy-making authorities are unable to address past shortfalls over a 5 year period due to their scale, they may need to reconsider their approach to bringing land forward and the assumptions which they make. For example, by considering developers’ past performance on delivery; reducing the length of time a permission is valid; re-prioritising reserve sites which are ‘ready to go’; delivering development directly or through arms’ length organisations; or sub-dividing major sites where appropriate, and where it can be demonstrated that this would not be detrimental to the quality or deliverability of a scheme.”</p>	<p>requirement. The average of the last 5 year housing delivery is 417 units, which exceeds the new target of 411 units.</p> <p>Liverpool method used as takes into account large variations in historic and future delivery.</p> <p>This method is also used by the neighbouring borough of Wandsworth as well as Barnet, Croydon and Havering.</p> <p>The Monitoring Report - Housing - 2019/20 (CDE5) Table 7 shows historic delivery variations affected by the inclusion of large sites within particular years.</p>  <p>Liverpool approach should be used when calculating five year housing land supply, spreading any housing delivery shortfall across the plan period rather than concentrating it into the relevant five year period, due to reliance on large strategic sites.</p> <p>https://cornerstonebarristers.com/news/when-liverpool-approach-should-be-used</p> <p>Such strategic sites tend to take longer to commence and deliver due to their relative complexities - such as those associated with getting planning permission and other development consents, land ownership issues and infrastructure delivery - compared to smaller sites, such that they are more likely to deliver later into the plan period.</p>	

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	<p>https://www.landmarkchambers.co.uk/resources/cases/high-court-rules-on-liverpool-vs-sedgefield-and-some-other-nppf-housing-interpretation-issues/</p> <p>The character of the borough with its many constraints as well as high land values, means that there are very few large scale sites for redevelopment, causing the supply of large sites to fluctuate, so in some years there is a high proportion of housing delivery from small sites / large sites and it is considered appropriate to smooth out delivery over the period as the large sites have longer lead-in times given their size, complexity and infrastructure requirements.</p> <p>In addition, the Publication London Plan at paragraph 4.1.10 states that: “<i>The increase in housing delivery required by these targets may be achieved gradually and boroughs are encouraged to set out a realistic, and, where appropriate, stepped housing delivery target over a ten-year period. This should be supported by a clear articulation of how these homes will be delivered and any actions the boroughs will take in the event of under delivery.</i>” This further recognises that the response to a new higher housing target should be through the preparation of the new Local Plan. This is considered a clear indication by the strategic policy-making authority as part of the plan-making and examination process, how to deal with any under delivery should it arise.</p> <p>Further, the London-wide Strategic Housing Land Availability Assessment (SHLAA) (2017) (https://www.london.gov.uk/sites/default/files/2017_london_strategic_housing_land_availability_assessment.pdf) which informed the preparation of the London Plan also set out this context at paragraph 5.18 <i>Whilst the 10 year London Plan target will be monitored on an annual basis, in reality, there will inevitably be borough level variations in housing delivery from one year to the next due to the inherent uncertainty in delivery on large sites, hence the need to take a longer-term view of overall housing delivery against the 10 year target and taking into account the overall pipeline of approvals.</i></p>	

Proof of Evidence of Michael Wood MRTPI	Council's comments	Implication for the 5YHLS																																	
<p>6.38. Based on these adjustments, the 2,208 homes identified in the AMR's 5YHLS, would only provide 4.9 years' worth of housing against the new London Plan target.</p> <p>Table 16 - Revised Five year housing land supply calculation methodology - Intend to Publish London Plan 2019 – adjusted</p> <table border="1"> <tbody> <tr> <td>a</td><td>Draft New London Plan Requirement - 1 April 2020 to 1 April 2030 (10 year plan period)</td><td>4,110</td></tr> <tr> <td>b</td><td>Net completions 1 April 2019 to 31 March 2020</td><td>332</td></tr> <tr> <td>c</td><td>Shortfall</td><td>(a÷10) - b 79</td></tr> <tr> <td>d</td><td>Five year requirement</td><td>(a÷10) x 5 2,055</td></tr> <tr> <td>e</td><td>Five year requirement including shortfall</td><td>d + c 2,134</td></tr> <tr> <td>f</td><td>Five percent buffer</td><td>e x 0.05 107</td></tr> <tr> <td>g</td><td>Total five year requirement (including 5% buffer)</td><td>e + f 2,241</td></tr> <tr> <td>h</td><td>Annual five year requirement (including 5% buffer)</td><td>g/5 448</td></tr> <tr> <td>i</td><td>Estimated supply over five year period</td><td>2,208</td></tr> <tr> <td>j</td><td>Five year land supply as a percentage of requirement (including 5% buffer)</td><td>(j ÷ g) x 100 98.5%</td></tr> <tr> <td>j</td><td>Five year land supply expressed in years</td><td>i ÷ h 4.9</td></tr> </tbody> </table>	a	Draft New London Plan Requirement - 1 April 2020 to 1 April 2030 (10 year plan period)	4,110	b	Net completions 1 April 2019 to 31 March 2020	332	c	Shortfall	(a÷10) - b 79	d	Five year requirement	(a÷10) x 5 2,055	e	Five year requirement including shortfall	d + c 2,134	f	Five percent buffer	e x 0.05 107	g	Total five year requirement (including 5% buffer)	e + f 2,241	h	Annual five year requirement (including 5% buffer)	g/5 448	i	Estimated supply over five year period	2,208	j	Five year land supply as a percentage of requirement (including 5% buffer)	(j ÷ g) x 100 98.5%	j	Five year land supply expressed in years	i ÷ h 4.9	<p>Overall, Richmond has taken a cautious approach to the inclusion of sites in the five year supply. Several large Site Allocations in the Local Plan have been excluded, and other sites with permission have been excluded where insufficient evidence is available of deliverability.</p> <p>Excluded Site Allocations include 240 units at Ham Close Estate Regeneration (Local Plan SA 15) where the Council is working in partnership with Richmond Housing Partnership on a redevelopment scheme, and the Twickenham Riverside redevelopment (TAAP TW7) for 49 units on Council owned land which is currently undergoing pre-application Public Consultation with an expected commencement in 2022.</p> <p>Excluded sites with extant permission include 16/4553/FUL (41 units granted permission 31/05/2018) where it was not possible to contact the developer or landowner.</p> <p>Table 16 was included as an illustrative calculation of the situation to acknowledge the anticipated adoption of the Intend to Publish London Plan, in the 2019/20 period incorporating the 2019/20 completions. However, that was not a true requirement at those dates. With the further delays to the finalisation of the London Plan and assuming the Plan will apply to 2020 – 2030, the revised Table A at paragraph 3.4 below shows a 5.4 years supply.</p> <p>Note https://lichfields.uk/media/6231/mind-the-gap-is-land-supply-on-track-to-meet-london-s-new-housing-targets_lichfields-insight.pdf</p> <p>Richmond "Optimism Bias = minus 10%" which demonstrates the Council's cautious approach which has previously underestimated supply.</p>	<p>Rejected and no change</p>
a	Draft New London Plan Requirement - 1 April 2020 to 1 April 2030 (10 year plan period)	4,110																																	
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3.2 In conclusion, the Council's Monitoring Report - Housing - 2019/20 is considered a robust assessment of future housing land supply. The Council has taken a cautious and evidence based approach to assessing deliverability of each site. The correction set out by the Council above results in a reduction of 2 units to the estimated supply over the five year period, considered an overall de minimis impact.

3.3 Irrespective of the above, and although the Council is avoiding adding new sites after the base date to prevent the skewing of supply, note there have been permissions granted since 1 April 2020, including on the following large sites:

- 19/2404/FUL - Queens Road Estate Richmond - 12 units - 13/05/2020
- 19/2789/FUL - Lockcorp House, Norcutt Road, Twickenham - 15 units - 19/06/2020
- 20/1499/FUL - 1 St James's Road Hampton Hill - 9 units - 29/09/2020.

In addition, on a former Council owned site (Site Allocation SA 7) the Strathmore Centre a scheme for 30 affordable units was approved by Planning Committee on 7 October 2020 (20/0539/FUL) subject to a S106 agreement)

3.4 A 5% buffer has been applied in the Council's five year housing land supply. There is no past shortfall as envisaged in the PPG and it is noted that Mr Wood does not suggest any different buffer. As above, it is in accordance with the Publication London Plan to consider that the new higher housing target can be met over a ten year period. On that basis and assuming the Plan will apply to 2020 – 2030, the following table illustrates the new London Plan target can be met.

Table A: Five year housing land supply calculation methodology – Draft New London Plan Requirement for 2020 - 2030

a	Draft New London Plan Requirement - 1 April 2020 to 1 April 2030 (10 year plan period)		4,110
b			
c	Remaining London Plan Requirement (10 year plan period)	a - b	4,110
d	Average per year	c ÷ 10 years	411
e	Five year requirement	d x 5	2,055
f	Five percent buffer	e x 0.05	103
g	Total five year requirement (including 5% buffer)	e + f	2,158
h	Estimated supply over five year period		2,219
i	Five year land supply as a percentage of requirement (including 5% buffer)	(h ÷ e) x 100	103%
j	Five year land supply expressed in years	h ÷ d	5.4