

HOUSING AND VIABILITY SUPPLEMENTARY REBUTTAL

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1 Introduction

1.1 This document has been prepared following a review of the evidence prepared by Mr Shane Baker on behalf of London Borough of Hounslow and Mr Andrew Croft on behalf of Royal Botanical Gardens, Kew. The focus of this response relates to the matters of i) housing supply and ii) the height of the proposed development.

1.2 In relation to housing supply Mr Baker's proof seeks to reduce the weight of the benefit associated with the delivery of housing, stating:

"the weight attached to this public benefit is moderated in light of the Council having a five year housing supply that does not need to rely on this site. The Council's housing trajectory indicates that as of December 2020, Hounslow has a deliverable supply equivalent to over 10 years of its minimum annual requirement, with a surplus of more than 10,000 units in the first five years (see the tables in Appendix 2). As such it is not necessary to provide housing on this site, and in turn harm the significance of sensitive heritage assets, to deliver the borough's housing supply requirements. It is agreed that the Council is able to demonstrate a five-year housing land supply, see 3.32 of the SOCG.

The draft London Plan [CDC 05] proposes higher housing targets across London. The targets proposed at examination were the subject of objection and have been reduced for Hounslow in the Panel Report [CDC 06] to 1,782 dwellings per year from 2,182 per annum. As the draft London Plan is not yet adopted and the housing numbers remain unsettled, this is a factor that should not be given more than limited weight at this stage."

1.3 While Hounslow is forecast to meet its current housing target, this will need be updated and substantially increased in 2020. The Draft London Plan (CDC 05) target should also be given weight as the emerging policy nears adoption, as required by paragraph 48 of the NPPF (CDC 01). In addition to an increase in housing land supply, a step change in completions is required to pass the Housing Delivery Test and avoid a future presumption in favour of sustainable development. I set out further details in Section 2.

1.4 In relation to the height of the proposed development, Mr Baker states in his proof:

"a substantial number of new homes could be provided within a development of smaller scale and lower height that would avoid harmful effects on the significance of heritage assets and the surrounding townscape."

1.5 On the same topic Mr Croft states:

"Given that the issues for the WHS and Orangery are largely the result of the height of the four building blocks and that there is significant variety in that height, it is not inconceivable to imagine a different arrangement of building blocks and heights that could deliver comparable public benefits without intruding into the setting of the WHS – however no evidence has been provided to assess whether alternative options exist and consequently no clear and convincing justification exists for the scheme in this form."

- 1.6 Critically neither Mr Baker nor Mr Croft support their statements with any viability evidence. Furthermore, an alternative scheme does not form part of the planning application submission. The suggestions that a reduced height scheme could viably offer the same level of benefit are not supported. I set out further details in Section 3.

2 Housing Land Supply and Housing Delivery Test

- 2.1 Mr Baker correctly states that based on Hounslow's pipeline sites, site allocations and windfall site projections the forecast housing delivery would achieve a surplus 5 Year Housing Land Supply after 5 years based on the current 822 homes per year local plan target. It should be noted, however, that the Council is failing to deliver this number of homes per year as set out below. Furthermore, given that the local plan will be out of date for housing target purposes later this year, it is inappropriate to consider housing supply only on the basis of historic targets. Instead, the housing target changes as set out in the Draft London Plan should be considered, which more than doubles Hounslow's target.

Housing Land Supply

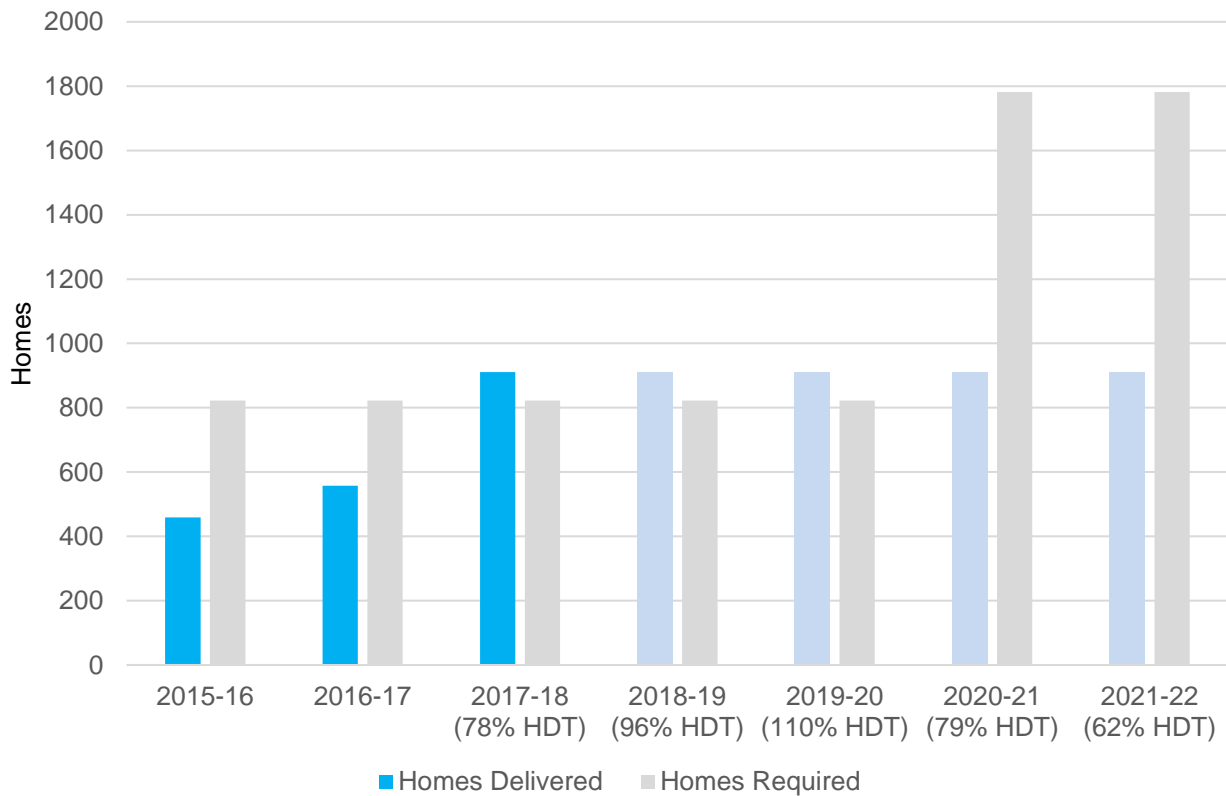
- 2.2 The surplus that Mr Baker identifies is based on a current local plan target of 822 homes a year, consistent with the adopted London Plan. The current local plan was adopted in September 2015 (CDD 01) and will need to be reviewed for housing target purposes in 2020, when it is five years old. The Draft London Plan (CDC 05) target for Hounslow requires a minimum of 1,782 homes per year, reflecting changes in housing need. The higher target will significantly reduce the surplus 5 Year Housing Land Supply that has been identified.
- 2.3 Mr Baker states that because the Draft London Plan target is not settled and has not been adopted it should be given limited weight. It is not agreed that limited weight should be given to the Draft London Plan. The minimum housing requirement, 1,782 homes per year has recently been confirmed in the "Intend to Publish" version of the Draft London Plan (December 2019). The Draft London Plan was subject to examination and the December 2019 version reflects the recommendations with regard to housing targets provided by the Panel. The Draft London Plan is expected to be adopted early in 2020 and will therefore be in place by the time the Hounslow Local Plan Target must be reviewed - this should therefore be given considerable weight. This is supported by the NPPF (CDC 01) which increases the weight that can be given to emerging policy as it nears adoption (paragraph 48).

Housing Delivery Test

- 2.4 Supply is only meaningful where this is translated into delivery. In considering the Housing Delivery Test and Hounslow's delivery against this it is evident that over the past 3 years Hounslow has only delivered 78% of its 822 home per year target, resulting in a 20% land buffer being applied. It is not currently even delivering homes at the current level targeted.
- 2.5 Given the Council's three year average delivery being just 642 homes per annum, i.e. 78% of the historic 822 target in the latest Housing Delivery Test, once the target increases to 1,782 home per year a very significant step change in delivery would be required. There is no evidence that the Council has taken any steps to ensure this step change is achieved quickly, or to ensure that the current shortfall on the target is not continued in the context of huge unmet need. To seek to reduce the benefit of the housing that will be secured by this site on the basis of historic housing targets is very misleading. Indeed, the Borough is at risk of falling under the Presumption in Favour of Sustainable Development. If the delivery rate of 911 homes per annum from 2017-18 (which is significantly higher than the preceding two years) was maintained then running delivery against the target would fall below 75% in 2021 and the borough would fall under the presumption, as set out in figure 2.1.

2.6 Against this background of under-delivery, and given the severity of housing need in the borough and wider London (with London itself forming a single housing market for planning purposes, as set out in the London Plan), it is absolutely imperative that significant weight is given to the additional market and affordable housing that the proposed development will provide and the security of delivery that L&Q will bring.

Figure 2.1 Delivery Against Housing Delivery Test



Source: MHCLG 2019 (for years 2015-2018)

3 Reduced Height Scheme

- 3.1 I do not duplicate the points made by Mr Brown on this point in his evidence. Instead I respond the suggestion that a reduced height scheme offers a viable alternative.
- 3.2 The proposed scheme has been developed through a collaborative team effort, balancing issues including design, viability and social benefit. While Mr Baker and Mr Croft suggest that an alternative scheme could offer the same benefits with less height, no evidence has been provided by either to support their assertions.
- 3.3 Reducing the height of the proposed scheme would result in a loss of homes, including affordable homes. Even in a very unlikely scenario where the proportion of affordable homes is maintained, the loss of housing itself would still represent a material loss of a very significant benefit. In reality, it is likely that the proportion of affordable housing would have to be reduced to maintain a viable scheme and would result in a greater loss in affordable homes.
- 3.4 The proposed scheme already offers beyond the maximum reasonable level of affordable housing, as set out in the statement of common ground (CDF 01). The same over delivery would not be achieved were the scheme reduced in size. A reduction in the number of homes would result in the viability of the scheme being even more challenging, in respect of which Mr Baker and Mr Croft do not present evidence or acknowledge. For instance, they do not consider:
- The cost of land being shared by fewer homes, and significantly less value generating space
 - The cost of site wide infrastructure being shared by fewer homes
 - Phasing changes and a reduction in amenity areas resulting in less placemaking value across the lifetime of the project.
- 3.5 The consequence of the reduced scheme viability is likely to be that the exceptional 50% affordable housing proposal would no longer be viable. Additionally, the scheme may reach the point at which there is not enough value to incentivise the change of use from its current use to residential. The latter is a particular concern considering the risk involved in development and the growth in warehousing and distribution values around London.
- 3.6 Separately from scheme viability, a reduced height scheme would also result in a lower CIL contribution towards local infrastructure. As CIL contributions are based on GIA, a reduced GIA will lead to reduced CIL. It is apparent that the assertions made by both Mr Baker and Mr Croft are without any basis; the benefits could not be maintained in a reduced scheme.

4 Conclusion

- 4.1 There is a pressing need for housing in Hounslow and London, and a step change in delivery is required in order to meet future housing delivery requirements. The additional homes that Citroen would provide should therefore be given significant weight in the planning balance.
- 4.2 The height of the scheme has been arrived at as part of a process to balance the different requirements including offering benefits to the community, providing housing and being deliverable. Reducing the height of the development would materially impact the ability of the scheme to deliver these benefits, including reducing the level of affordable housing. No evidence has been provided to demonstrate that a reduced height scheme could be viably delivered that would provide the same or similar benefits as the proposed scheme.