

Runnymede 2030 Duty to Co-operate Update Statement



May 2018

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Appendix 1: Letter from Thames Water (March 2018)

Chapter 1: Introduction

- 1.1 This Duty to Cooperate (DtC) statement seeks to update the reader on how the Council has continued to comply with the requirements of the Localism Act (2011) which relate to the Duty to Cooperate:
 - Since the publication of the Council's last DtC Update Statement in January 2018, and
 - Following the Council's DtC Review which took place in September 2017.
- 1.2 This update statement must be read in conjunction with the Council's 2015 DtC Scoping Framework, earlier DtC Update Statements (from July 2016, May 2017 and January 2018) and the Council's September 2017 DtC Review document. These documents when read together alongside this latest update statement, seek to provide a continuous dialogue of the steps that the Council has taken to cooperate with relevant partners on strategic cross boundary matters since the commencement of Plan preparation to the present day.
- 1.3 Given the advanced stage of Plan preparation that the Council has now reached, following chapters 2 and 3 which consider progress with the production of Statements of Common Ground (SoCG) and Memorandums of Understanding (MoU), this update statement seeks to specifically focus on whether the Council has achieved the outcomes that it had set out to achieve for each Duty to Cooperate matter as set out in its 2015 DtC Scoping Framework and as revised in some cases in the September 2017 Duty to Cooperate Review. Where it is identified that outcomes have not been fully achieved and further actions are required, this is confirmed.

Chapter 2: Statements of Common Ground/Memorandums of Understanding

Reviewing partners for production of Statements of Common Ground

- 2.1 The September 2017 Duty to Cooperate Review confirmed following consideration of all of the responses received through Duty to Cooperate engagement since the commencement of Plan preparation, especially in relation to the topics of unmet housing need, unmet Gypsy and Traveller need and Green Belt that the list of partners to be engaged with on these matters moving forward needed to be refocused. It was concluded that the Council needed to refocus its efforts on those authorities with which it has the closest functional links with, and those which the Council believed, following an assessment of constraints, could have the best chance of assisting Runnymede meet any unmet needs.
- 2.2 The January 2018 Duty to Cooperate update statement summarised where the Council would focus its efforts in terms of strategic cooperation, particularly in relation to the production of Statements of Common Ground or Memorandums of Understanding. This analysis confirmed that the Local Authorities which Runnymede has the strongest functional links with and where SoCGs/MoUs should be progressed are as follows:
 - Elmbridge Borough Council
 - The Royal Borough of Windsor and Maidenhead
 - Spelthorne Borough Council
 - Surrey Heath Borough Council
 - Woking Borough Council
- 2.3 The Council has also had proactive discussions with Surrey County Council in the first part of 2018 and it was mutually agreed that the production of a SoCG should be produced with this partner.
- 2.4 Following discussions with the Chairman of the Planning Committee, the Council's contact in the early part of 2018 with other local authorities not listed above regarding statements of Common Ground is summarised in the table below.

Duty to Cooperate contact with Local Authority partners following completion of 2017 DtC Review in relation to production of SoCGs

Local Authority	When written to	Response
Bracknell Forest	07.02.2018 RBC wrote to BFBC. To advise that the Council had amended its spatial strategy to address concerns previously raised by Bracknell Forest. Letter also advised that following DtC Review, RBC no longer felt that a SoCG/MoU was necessary.	None received
Epsom and Ewell	23.01.2018-RBC wrote to EEBC. Advised that following DtC Review, RBC no longer felt that a SoCG/MoU was necessary.	None received
Guildford	31.01/201-RBC wrote to GBC. Advised that following DtC Review, RBC no longer felt that a SoCG/MoU was necessary. Asked for the views of GBC.	31.01.2018 GBC responded to confirm that they are also of the view that a formal SoCG is not necessary between GBC and RBC given the strength of any shared issues. Any necessary cooperation can continue through the usual channels of consultations and meetings/emails should the need arise.
Hart	24.01.2018-RBC wrote to HDC. Advised that following DtC Review, RBC no longer felt that a SoCG/MoU was necessary.	24.01.2018. HDC replied to say that the Council agreed with RBC's suggested approach. HDC confirmed however that they would be happy to engage in future discussions as required.
London Borough of Hillingdon	07.02.2018-RBC wrote to LBHi. Advised that following DtC Review, RBC no longer felt that a SoCG/MoU was necessary. Instead suggested that the HSPG was the most logical DtC mechanism to engage with on matters related to Heathrow which is the primary reason for linkages between the two authorities.	None received

London Borough of Hounslow	07.02.2018- RBC wrote to LBH. Advised that following DtC Review, RBC no longer felt that a SoCG/MoU was necessary. Instead suggested that the HSPG was the most logical DtC mechanism to engage with on matters related to Heathrow which is the primary reason for linkages between the two authorities.	None received
London Borough of Kingston	25.01.2018-RBC wrote to LBK. Advised that following DtC Review, RBC no longer felt that a SoCG/MoU was necessary.	None received
London Borough of Richmond	23.01.2018-RBC wrote to LBR. Advised that following DtC Review, RBC no longer felt that a SoCG/MoU was necessary.	21.02.2018 Responded to confirm it remains the LBR's view that a Statement of Common Ground/Memorandum of Understanding is not necessary, on the basis that Richmond and Runnymede do not share a borough boundary and the housing markets are not directly linked.
Mole Valley	24.01.2018-RBC wrote to MVDC. Advised that following DtC Review, RBC no longer felt that a SoCG/MoU was necessary.	25.01.2018 MVDC responded. Agreed that whilst MVDC and RBC may both experience impacts from London and the wider south east, they are not adjacent to one another nor are they in the same housing market area. Functional linkages at a local level are therefore limited or absent and do not, materially impact on plan making for Runnymede.

Reigate and Banstead	24.01.2018-RBC wrote to RBBC. Advised that following DtC Review, RBC no longer felt that a SoCG/MoU was necessary.	25.01.2018 RBBC responded. Confirmed agreement with the conclusions of the RBC review of its DtC functions. Stated that RBBC is content to continue the informal Borough level working arrangements through different fora as they presently exist at Member and Officer level and should further issues arise which requires more focussed attention then there is flexibility and good-will between RBC and RBBC to provide additional mechanisms to adequately address these if necessary.
Rushmoor	16.02.2018 RBC wrote to RuBC. Advised that following DtC Review, RBC no longer felt that a SoCG/MoU was necessary.	20.02.2018 RuBC confirmed that they agreed with RBC's conclusion and do not consider it necessary to progress the SoCG. However, Rushmoor would welcome opportunities to engage on relevant cross boundary matters as RBC's Local Plan progresses.
Tandridge	24.01.2018-RBC wrote to TDC. Advised that following DtC Review, RBC no longer felt that a SoCG/MoU was necessary.	24.01.2018 TDC responded to say that RBC's approach made logical sense and Tandridge is more than happy to continuing working on the Surrey LSS and SIS with RBC and other projects that may be appropriate.

Slough	07.02.2018 RBC emailed SBC to suggest that MoU/SoCG probably not required. Suggested that RBC and SBC could instead rely on the HSPG as key DtC mechanism given that Heathrow Airport is the primary reason for linkages between the two authorities. RBC confirmed however that as this was a change in approach from RBC and draft text for an MoU had been prepared, RBC was happy to proceed with the MoU if SBC would find it helpful to do so.	03.05.2018. SBC confirmed that they wished to proceed with signing a MoU. The agreement was signed on 17.05.2018
South Bucks and Chiltern	23.01.2018-RBC wrote to SB&C. Advised that following DtC Review, RBC no longer felt that a SoCG/MoU was necessary.	31.01.2018 SB&C responded to confirm that they supported Runnymede's amended approach. Only caveat related to the Joint Working Fund Expression of Interest Bid that the Royal Borough of Windsor & Maidenhead had submitted to CLG. The bid – for a Sub-regional Growth Study – was made on behalf of RBWM, Slough BC, South Bucks DC and Chiltern DC. The first part of the work set out in the bid would establish the appropriate geography for the sub-regional work. Depending on the conclusions reached, South Bucks and Chiltern suggest it may be necessary to re-visit Duty to Co-operate arrangements between them and Runnymede.
Waverley	31.01.201-RBC wrote to WBC. Advised that following DtC Review, RBC no longer felt that a SoCG/MoU was necessary.	02.02.2018 WBC responded to confirm that they shared RBC's views regarding the connections between our respective boroughs. In particular, agreed that there is no need for a formal Statement of Common Ground.

Progress with the production of Statements of Common Ground

2.5 The Council has worked with key partners to produce Statements of Common Ground between January and May 2018. This includes the production of an overarching 'parent' Statement of Common Ground with Spelthorne Borough Council (Runnymede's Housing Market Area partner) which was signed and published on 15th May 2018. The following SoCGs which form annexes to this main agreement are currently also being progressed:

-Elmbridge and Spelthorne Borough Councils

-the Royal Borough of Windsor and Maidenhead and Surrey Heath Borough Council (signed on 23.01.2018)

-Woking Borough Council

2.6 The Council has also signed a Statement of Common Ground with Surrey County Council (signed on 15th May 2018) and Memorandum of Understanding with Slough Borough Council (signed on 17th May 2018) as referred to in the table above.

2.7 The Duty to Cooperate page on the Council's website displays all signed SoCGs and MoUs.

Chapter 3: Monitoring of DtC progress and engagement with Councillors

Monitoring of the Duty to Cooperate

- 3.1 In the September 2017 Duty to Cooperate Review it was recommended that regular reviews with Members should be added into the Council's Duty to Cooperate work. These reviews with members would allow progress to be more closely monitored and would allow action plans to be formulated where issues were identified and also allowed for escalation where required. Since the production of the Duty to Cooperate Review was produced, a standing item on each of the Local Plans Members Working group agendas has been 'the Duty to Cooperate'. Officers have provided an update on progress with different strategic cross boundary issues and discussed with Members any difficulties being experienced. Meetings of the Local Plans Members Working Group have taken place on the following dates since September 2017: 5th September, 3rd October, 1st November, 12th February, 14th March.
- 3.2 In addition, it was agreed that it would be helpful for weekly updates to be sent to the Leader of the Council to provide updates on progress with the preparation of the Local Plan and to provide weekly updates on progress with the Duty to Cooperate. These Leader updates have taken place since September 2017. In addition, a weekly progress report (in the form of a GANTT chart) has also been sent to all Members including on progress with the Duty to Cooperate from March 2018.
- 3.3 Specific examples of how the introduction of more robust and regular monitoring of the Duty to Cooperate with Members has allowed the resolution of issues quickly and positively are as follows:
- RBC Members have worked with Surrey County Council to ensure that the A320 study was finalised and published in a timely manner to support the Runnymede Local Plan timetable after delays in achieving Member oversight at Surrey were experienced (March/April 2018).
 - The Chairman of the Planning Committee wrote to the Environment Agency in November 2017 after officers advised that the completion of the Local Plan evidence base was being hampered by the delay in the Environment Agency issuing the Council with its base modelling for the River Thames Scheme and updated climate change modelling. Publication dates had slipped and officers were struggling to get certainty as to when modelling could be expected. The Chairman's letter also requested that the Environment Agency provide comments on the Council's Strategic Sequential Test methodology which they had had for over 18 months. The Chairman of the Planning Committee's involvement helped to quickly resolve these problems.
- 3.4 In addition to the above, Members have been involved in the production of Statements of SoCGs with partners. Oversight has been provided through the Local Plans Members Working Groups and draft SoCGs have also been shared with the Council's Leader so that Council aspirations can be properly recorded and expressed. The Chairman of the Planning Committee and the Deputy Leader both attended a meeting of the Runnymede-Spelthorne Joint Member Liaison Group in April 2018 with Members at Spelthorne to discuss and agree the wording for the Runnymede-Spelthorne SoCG.

- 3.5 It is also considered noteworthy to mention that Local Plan updates have continued to be reported to each meeting of the Planning Committee (which occur every 3 weeks). 65 such reports have now been produced since the commencement of Plan preparation and also cover Duty to Cooperate matters.

Local Strategic Statement Update

- 3.6 In addition to the above, in February 2018, the Runnymede Leader, along with other Surrey Leaders sitting as the Surrey Strategic Planning and Infrastructure Partnership agreed the Surrey Local Strategic Statement (LSS). The Council has worked with the County Council, District and Borough Councils of Surrey to produce a Local Strategic Statement and an accompanying Surrey Infrastructure Study. The LSS has been agreed to articulate the shared objectives in the County of Surrey for spatial infrastructure and economic issues. The LSS provides agreement to work together to support economic prosperity, meet housing need, deliver infrastructure and support environmental sustainability. It will form a base for further and future cooperation, providing an agreed base for political discussion in these areas.

Chapter 4: Housing specific matters

- 4.1 **Outcome 1-The production of a Strategic Housing Market Assessment (SHMA), to supersede the SHMA produced in 2009:** Completed through partnership working with Spelthorne Borough Council in November 2015 and following engagement with other Local Authorities and partners. Since this time RBC has commissioned a partial update to the SHMA which was published in January 2018 and which included engagement and agreement with Spelthorne Borough Council.
- 4.2 **Outcome 2-The production of a Strategic Land Availability Assessment (SLAA) during the early stages of plan preparation (and then where necessary during the lifetime of the Plan) to identify the land in Runnymede that is available and suitable for different types of development, including housing:** Completed. Interim SLAA published in 2016 and updated SLAA published in January 2018. Both SLAAs were produced following the agreed joint methodology produced by Runnymede and Spelthorne Borough Councils in December 2015. This methodology was produced in recognition of the fact that housing is a key cross boundary matter between Runnymede and Spelthorne given that the two Local Authorities form a Housing Market Area. Both authorities felt that a consistent approach in assessing housing supply matters was important.
- 4.3 **Outcome 3-Alongside Spelthorne BC, to meet the objectively assessed needs (OAN) for housing within the Runnymede-Spelthorne HMA:** Since the production of the January 2018 DtC Update Statement, the Council has re assessed capacity on each of its proposed allocations following the consideration of all of the responses provided by land promoters in the January 2018 consultation on the draft Local Plan. The Council is also amending its housing trajectory following to take account of consideration of the most up to date information received from promoters on when allocated sites would be available for development. Officers have also liaised with the Council's Major Projects Team in terms the stage that pre application discussions for each of the allocated sites have reached.
- 4.4 On this basis, the Council has reduced its housing shortfall from 94 to 27 dwellings over the period of the Local Plan. This is reflected in the amended draft Local Plan which is currently the subject of public consultation.
- 4.5 Since the January 2018 DtC update statement was produced, as referenced in chapter 2 of this statement, as part of the production of the Runnymede-Spelthorne Statement of Common Ground, discussions have continued in relation to how housing needs will be met in full across the HMA area. The SoCG which has been produced with Spelthorne shows that both Local Authorities remain focussed on achieving this outcome. Whilst Runnymede Borough Council is now confident of delivering the very great majority of its proportion of the OAN over the period of its Local plan, Spelthorne Borough Council is at a relatively early stage of the preparation of its Local Plan. The Spelthorne SLAA 2018 shows that it is estimated that the Council could deliver 428dpa over the period of their Local Plan which would not meet their proportion of the Objectively Assessed Housing needs in full. However, Spelthorne has various ongoing work streams in train which could increase delivery. RBC and SBC have agreed to

continue to liaise on this matter and the next officer update meeting is to be arranged for Summer 2018 to review progress.

- 4.6 It is also considered relevant that since the January 2018 Duty to Cooperate Statement was produced, the Council has re-appointed GL Hearn to review and assist the Council in responding to a number of representations which have made detailed comments on the SHMA during the January 2018 consultation on the draft Local Plan. GL Hearn is also examining the potential implications on the Runnymede OAN of both the 2016-based national population and sub-national population projections as well as the release of updated affordability ratio data which are being released over April and May 2018. At the time of writing, the Council is awaiting GL Hearn's final conclusions on whether there will be any further changes to the Council's proportion of the wider OAN figure prior to submission of the Local Plan to the Secretary of State. This will be addressed in the Council's Housing Topic Paper which will be submitted to the Secretary of State at the end of July 2018 along with the Local Plan document and its evidence base.
- 4.7 **Outcome 4- If RBC and SBC cannot meet their OAN in full over the periods of their Local Plans, ensuring that unmet needs are met within surrounding HMAs starting with those that fall within other HMAs that have the strongest links with the Runnymede-Spelthorne HMA to see if they could help meet any unmet needs:** Engagement carried out by RBC to date with Local Authority partners has led to the conclusion being drawn that it is highly unlikely that any Local Authorities outside the HMA that Runnymede has the strongest functional links with, will be in a position to meet any unmet needs from Runnymede.
- 4.8 **Outcome 5-To deliver a sustainable housing strategy that will deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive mixed communities:** The draft Local Plan sets out the Council's strategy for achieving this outcome.

Chapter 5: Gypsies and Travellers

5.1 **Outcome 1- The production of a Traveller Accommodation Assessment (TAA), to supersede the North Surrey GTAA produced in 2007:** The Council published an up to date GTAA in January 2018. As part of the production of the GTAA, the Council's consultants Opinion Research Services engaged with the 5 local authorities bordering Runnymede to explore issues relating to cross boundary working. As part of the stakeholder consultation ORS also interviewed the representative of the Showman's Guild.

5.2 **Outcome 2-That the identified need for Runnymede will be met within the Borough boundary:** At the current time, over the period of the Local Plan, RBC is proposing to meet 74% of the identified accommodation needs for Gypsies and Travellers. No plots have been identified to meet the accommodation needs of travelling showpeople.

5.3 As such, following an internal officer meeting on 17th January, action plans to identify further sources of supply, and to outline various options for the Council's enforcement strategy to bring 48 pitches back into authorised use for gypsies and travellers were taken to the Local Plans Members Working Group on 12th February 2018. The minutes from this meeting confirm the following:

'Members discussed the options and steps to be taken to address the shortfall of pitches and plots for travellers over the period of the Local Plan, including opportunities to ensure maximised accommodation on current lawful sites as referenced in emerging policy SL22.

Further options and future potential steps were discussed and agreed not to be minuted due to the sensitive nature of some opportunities through their links to current planning enforcement cases. Members identified that enforcement matters needed to progress and endorsed the direction of travel proposed to seek to address the shortfall in pitch provision. A topic paper will be prepared in due course'

5.4 Since this meeting officers have been assessing whether there may be any opportunities to increase pitch provision on existing lawful traveller sites in the Borough and is re visiting whether all opportunities to provide traveller pitches on previously developed sites in the Green Belt which are being promoted through the Local Plan process and/or the SLAA have been exhausted. Part of this work will include proactively approaching land owners where appropriate.

5.5 Officers will be reporting back to the Local Plans Members Working Group during w/c 16th July on progress with this additional piece of work and on the ongoing enforcement investigations into the unauthorised use of 48 travellers pitches in the Borough and to agree how Members would like officers to proceed.

5.6 **Outcome 3-Reach agreement across Surrey on the provision of a transit site in the County:** Runnymede's Chief Executive took a paper to contextualise the implications of a lack of provision of transit site in Surrey to the meeting of Surrey Leaders of 7th February 2018.

5.7 Surrey Leaders have asked Officers across the County to coordinate data across the Surrey County area regarding recent historic unauthorised encampments of Gypsies and Travellers, in addition to establishing a protocol to collect and coordinate data on new encampments. Runnymede Officers are now working with SPOA, on the instruction of Surrey Chief Executives given 11th May 2018, to map encampments to inform future joint work to identify the most effective location and scale for a transit site in the County.

Chapter 6: Economy specific matters

- 6.1 **Outcome 1-The production of a Functional Economic Area analysis which identifies the boroughs/districts that Runnymede has the strongest functional links with for economic purposes:** Completed and published in June 2015. The partners set out in the economy section of the 2015 DtC Scoping Framework were consulted on the draft report prior to the study being finalised.
- 6.2 **Outcome 2-The production of an Employment Land Review that updates the study published in 2010:** The Council's Employment Land Review was completed and published in September 2016. The partners set out in the economy section of the 2015 DtC Scoping Framework were consulted on the draft report prior to the study being finalised.
- 6.3 Updated analysis of the demand for employment land and floorspace in the Borough over the period of the Local Plan was commissioned by the Council in 2017 and forms part of the partial update of the SHMA which was published in January 2018.
- 6.4 **Outcome 3-The production of a Strategic Land Availability Assessment (SLAA) during the early stages of plan preparation (and then where necessary during the lifetime of the Plan) to identify the land in Runnymede that is available and suitable for different types of development, including economic uses:** Completed. Interim SLAA published in 2016 and updated SLAA published in January 2018. Both SLAAs were produced following the agreed joint methodology produced by Runnymede and Spelthorne Borough Councils in December 2015.
- 6.5 **Outcome 4-The production of a Town and Local Centres Study, to supersede the study published in 2009:** Completed and published in November 2015. Engagement with the partners set out in the Council's 2015 DtC Scoping Framework was carried out prior to the study being finalised.
- 6.6 **Outcome 5-The creation of a policy framework that supports the needs of the economies of the Borough and the needs of the wider FEA:** The draft Local Plan sets out the policy framework that supports the needs of the economies of the Borough. The needs of the wider FEA are being examined through the Joint Evidence Base and Infrastructure Study work being carried out as part of the Heathrow Strategic Planning Group which is discussed in more detail in chapter 14 of this statement.
- 6.7 **Outcome 6-Ensuring the delivery of retail and other uses in town centres to meet the needs of the Borough, having regard to the position of Runnymede's towns in the established retail hierarchy:** An analysis of the regeneration schemes anticipated to be delivered in the Borough's town centres over the period of the Local Plan supports that the Council will be able to meet identified retail needs in Addlestone and Chertsey Town Centres over the period of the Local Plan. However it has been identified that it is unlikely that the Council will be able to meet its identified needs in Egham town centre in full over the period of the Local Plan. This matter has been discussed with Spelthorne Borough Council since the January 2018 Duty to

Cooperate Statement and is reflected in the SoCG which has been produced with Spelthorne. It was also discussed at the meeting of the Runnymede-Spelthorne Joint Member Liaison Group meeting in April 2018. Runnymede will be making a formal approach to SBC during the current Spelthorne Local Plan consultation, formally requesting that any unmet needs from Egham are met in Staines upon Thames Town Centre given the proximity of this larger centre to Egham and to address historic concerns raised by SBC about growth in Runnymede's town centres threatening the position of Staines upon Thames in the wider retail hierarchy.

- 6.8 **Outcome 7-Ensuring that the Borough's identified B class employment needs are met over the period of the Local Plan in Runnymede or the wider FEA:** The Council anticipates being able to meet its identified economic floorspace needs as set out in the 2018 SHMA update in full over the period of its Local Plan. The needs of the wider FEA are being examined through the Joint Evidence Base and Infrastructure Study work being carried out as part of the Heathrow Strategic Planning Group which is discussed in more detail in chapter 14 of this statement .

Chapter 7: Green Belt

- 7.1 **Outcome 1-Completion of a Borough wide Green Belt Review which will assess how well the Borough's Green Belt performs against the purposes of including land within the Green Belt. The land has also been assessed against technical constraints. Overall the study seeks to identify any land which performs weakly against the purposes of including land within the Green Belt, isn't constrained in other ways and which could therefore potentially be returned to the Urban Area to help meet identified development needs over the Plan period:** Two phases of Green Belt Review work have been completed in December 2014 and March 2017. During the 2014 Green Belt Review work, the draft methodology was shared and discussed with the neighbouring and wider partner authorities and the comments received taken into account as the study progressed. This was in recognition of the fact that Green Belt policy is a strategic policy, which must therefore be considered collectively by local authorities, particularly where Green Belt surrounding an urban area falls into different administrative boundaries.
- 7.2 The partners set out in the Green Belt section of the 2015 DtC Scoping Framework were consulted on the proposed methodology for the Green Belt Review part 2 work at an early stage of the study, again in recognition of the strategic cross boundary nature of Green Belt policy.
- 7.3 **Outcome 2-Completion of a technical review of the Green Belt boundary in the Borough in order to consider, and if necessary make any minor amendments required to make the boundary more logical and/or defensible:** Study completed and published in March 2016 and addendum produced and published in early 2018. During the course of the project, due to the relatively minor nature of the proposed amendments to Green Belt boundaries in close proximity to Borough boundaries, it was considered that focussed engagement under the Duty to Cooperate was not required. Throughout Plan preparation however, the Council has continued to engage with Surrey Heath BC about the proposals for the Longcross Garden Village site given that this strategic site straddles the boundary with this Local Authority. Surrey Heath BC has raised no objection to the proposed removal of this site from the Green Belt through the Local Plan or the proposed boundary of the site which is proposed in Runnymede.
- 7.4 **Outcome 3-To meet identified needs for housing, employment, retail etc. This may necessitate alteration to the Borough's Green Belt boundary to increase the amount of developable urban land:** Through the preparation of the Runnymede Local Plan it has been identified that to meet the Council's housing and traveller needs, land will need to be removed from the Green Belt. The Council is of the opinion that there are exceptional circumstances for amending Green Belt boundaries through the Local Plan and these arguments can be viewed in the Council's Exceptional Circumstances Paper (January 2018) and its addendum (April 2018). None of the Council's Local Authority partners have objected to the principle of Runnymede removing land from the Green Belt to meet identified needs. The only area of land proposed to be released from the Green Belt which is considered to have potential cross boundary implication is the Longcross Garden Village site as this site

straddles the administrative boundary with Surrey Heath. Throughout Plan preparation the Council has therefore engaged with Surrey Heath BC on an ongoing basis about this site. Surrey Heath BC has raised no objection to the proposed removal of this site from the Green Belt through the Local Plan.

Chapter 8: Natural Environment

- 8.1 **Outcome 1- Designating Chertsey Meads as a SANG following partnership working with Natural England:** The Chertsey Meads management plan has been agreed with Natural England and supported the production of a *Public Access Assessment and Constraints and Issues document* for the site by Surrey Wildlife Trust, as commissioned by the Council.
- 8.2 Natural England has agreed the principle of the site to be used as SANG and has advised that a Chertsey Meads SANG management plan should be prepared which should include the essential and desirable SANG criteria the site meets; enhancements to be funded through SANG tariff ; and provision of a site map to highlight the circular walk. Officers are currently producing the SANG management plan and are aiming to agree the plan with Natural England by the end of July 2018, to allow the SANG to be designated by the Council ahead of the Local Plan examination.
- 8.3 **Outcome 2-Demonstrating that the Council has sufficient SANG land to support SS5 for the whole Local Plan period:** The Council is currently producing a SANG topic paper which will set out the supply of SANG which will include utilisation of Chertsey Meads, Trumps Farm for Longcross Garden Village and the potential of SANG land at Ottershaw East. Towards the latter part of the Plan, approximately 560 dwellings will not be mitigated utilising existing and known proposed SANG. The Council is currently working with Natural England and a landowner who has been identified as having a piece of land in their ownership that may be capable of coming forward as SANG, with the aim of identifying additional SANG land to support housing growth in the latter part of the plan period.
- 8.4 **Outcome 3-Avoid further habitat fragmentation, to restore functional habitat connectivity and to enhance existing sites of biodiversity and nature conservation importance where possible:** The Council has worked closely with Natural England, RSPB, the Surrey Wildlife Trust and the Surrey Nature Partnership to produce a suite of nature conservation policies for the Local Plan and these bodies have had the opportunity to comment on the policies as they have been drafted and prior to formal consultation. The Council has positively responded to suggestions made by these consultees on where the Local Plan could be strengthened both during informal and formal consultations. As such, the Council is confident that all key points made by partners have now been satisfactorily addressed and will be seeking to confirm this with partners during the final round of consultation on the draft Local Plan before it is submitted to the Secretary of State.
- 8.5 Officers met with Natural England on 13 March 2018 to discuss the comments that were made through the Reg. 19 (part 1) consultation and whether a SoCG was needed. NE confirmed that if all matters from the representation were dealt with, a SoCG would not likely be needed. Officers consider that the comments raised through the representation have been addressed and as such it is unlikely that a SoCG will be required. The Council will be seeking to confirm with Natural England through the final round of public consultation on the draft Local Plan before it is submitted to the Secretary of State that they have no outstanding concerns.

Chapter 9: Transport

- 9.1 **Outcome 1- The completion of a Strategic Highway Assessment Report for the Borough, an Infrastructure Needs Assessment, Infrastructure Delivery Plan and A320 feasibility study (joint study working in partnership with Surrey Heath Borough Council, Woking Borough Council and Surrey County Council):** The Council published its first Transport Assessment to support the Local Plan in June 2016 and a further Strategic Highway Assessment Report (SHAR) in October 2017. Both studies have been produced by Surrey County Council (with consultancy support for the 2017 study). Extensive partnership working with SCC has occurred during the production of both studies. Highways England has been consulted on both studies. In relation to the SHAR, since the January 2018 dtC update statement was produced, Highways England raised a number of concerns during the period of public consultation on the draft Local Plan. The Council responded to the concerns of Highways England on 13th March 2018 and confirmed that the Council would welcome a meeting to discuss (as this was suggested by Highways England). No response has been received from Highways England since this time despite a follow up request for a response being issued by the Council on 29th March. As such, at the time of writing it is unknown whether the additional information provided by the Council has addressed the concerns of Highways England. Highways England will be further engaged with during the Local Plan part 2 consultation with the aim of ensuring that the Council has overcome their concerns.
- 9.2 The Council's Infrastructure Needs Assessment (May 2017) and Infrastructure Delivery Plan (December 2017) have both been published. The production of both studies involved significant engagement with a range of partners as reported in the January 2018 DtC Update Statement.
- 9.3 In terms of the A320 Feasibility Study, please see Outcome 3 below.
- 9.1 **Outcome 2-That the Local Plan will be capable of sustainable delivery, without unacceptable adverse impact on the Strategic Road Network (managed by Highways England) or the Local Road Network (managed by Surrey County Council):** Since the January 2018 Duty to Cooperate update statement was published, Runnymede has continued to work in partnership to produce the Runnymede-Surrey County Council SoCG, the principal focus of which relates to planning for the delivery of highways infrastructure.
- 9.2 As an action moving forwards, the Council will approach HE during the course of the Local Plan part 2 consultation to explore whether it would be beneficial to enter into a SoCG with Runnymede in relation to matters related to the Strategic Road Network.
- 9.3 **Outcome 3- To review opportunities for transport improvements in the wider area that could be beneficial for Runnymede, and to support such opportunities where the positive impacts would on balance outweigh any negative impacts:** Runnymede Borough Council continues to engage and work with its partners to identify and work towards transport improvements in the wider area and within Runnymede. This has been achieved through an understanding of the cumulative impacts of growth on the local and strategic highway

network through Transport Assessments and the A320 Corridor Study and exploring opportunities to improve infrastructure through infrastructure studies such as the Infrastructure Needs Assessment and Infrastructure Delivery Plan and workshops to support these. The actions leading to this have been reported in previous DtC Update Statements. Since the last DtC Update Statement of January 2018 the Council has continued to positively engage with its stakeholders and partners as follows: -

- The M25 South West Quadrant (SWQ) Stakeholder Reference Group – Building on the publication of the M25 SWQ Strategic Study March 2017 and to support the governments second Road Investment Strategy (RIS 2), further stakeholder engagement and feedback requested from Highways England to explore options for alleviating congestion in the SWQ including demand management, public transport and additional capacity. Workshop was attended by Officers on 26th February 2018;
- A320 Corridor Study – Project to identify impacts and mitigation to the A320 Corridor arising from Local Plan and wider growth. Continued engagement with Surrey Heath and Woking Borough Councils and Surrey County Council to prepare final A320 Corridor Study. Final Corridor study published April 2018 and confirmation from government that stage 1 Housing Infrastructure Fund (HIF) bid successful. Further engagement with partners will be required to prepare the business case for stage 2 consideration.
- Heathrow Strategic Planning Group (HSPG) – Continuing engagement with the HSPG on transport matters (see chapter 14 on Heathrow);
- Network Rail/South Western Railways – Working with Surrey County Council and Homes England as part of the Longcross Garden Village project the Council has engaged with the rail franchise holder and successfully secured additional stopping service enhancements during peak hours at Longcross station. The Council working with its partners will continue to engage with Network Rail/South Western Railways as part of the Longcross Garden Village project to secure additional services at Longcross outside of peak hours in line with other stations on the Reading-London Waterloo Rail Line.

9.4 Outcome 4-To encourage more sustainable modes of transport and initiatives through the Local Plan to seek a modal shift to alternative modes of transport and reducing the need to travel: The Council’s draft Local Plan sets out its strategy for achieving this objective. Furthermore, Runnymede Borough Council continues to engage and work with its partners to identify and work towards delivery of more sustainable modes of transport, seek modal shift and reduce the need to travel. To this end and engaging and working with partners the Council has published an Infrastructure Needs Assessment and Infrastructure Delivery Plan supported by workshops with identification of sustainable transport and travel projects and initiatives. The actions leading to this have been reported in previous DtC Update Statements. Since the last DtC Update Statement of January 2018 the Council has continued to engage positively with its stakeholders and partners as follows: -

- Statement of Common Ground (SoCG) with Surrey County Council – SoCG agreed with SCC and includes an infrastructure schedule highlighting the infrastructure projects agreed with SCC for forward planning. The agreed schedule includes projects for cycling and pedestrian improvements as well as rail station travel plans.

- M25 Accessibility and Integration Study – Study brought forward by Highways England to address severance issues between communities due to the M25 and whether any improvements can be made to connect areas by active and sustainable modes of travel. Although not reported in the January 2018 DtC Update Report Officers attended a workshop on 11th October 2017 and subsequently engaged with Highways England through an interactive mapping tool to identify potential projects. Two bids submitted 8th December 2017 for improvements to the Borough’s cycle network. Outcome of bids awaited.

9.5 **Outcome 5-That the Council can demonstrate that growth in the Borough over the period of the Local Plan will not result in unacceptable air quality impacts:** The main source of air pollution in Runnymede is road traffic emissions from major roads. The Council commissioned borough wide air quality modelling in the early part of 2018. The aim of the modelling was to ascertain whether or not the development expected to come forward over the period of the Local Plan would be likely to cause potential air quality issues, i.e. approaching or exceeding the air quality objectives for nitrogen dioxide (NO₂) or particulate matter (PM₁₀ and PM_{2.5}). In addition, the Habitats Regulations Assessment work which has underpinned the production of the Local Plan has specifically considered air quality impacts on the Special Protection Area. The Council shared its Borough wide air quality modelling work with all Surrey local authorities and the Royal Borough of Windsor and Maidenhead in May 2018.

Chapter 10: Flooding

- 10.1 **Outcome 1-The production of a NPPF compliant SFRA to replace that produced in 2009:** The Council published its Level 1 Strategic Flood Risk Assessment in January 2018. Extensive engagement with the Environment Agency occurred during the preparation of this study as well as with other local authority partners, Surrey County Council and Thames Water before the document was finalised.
- 10.2 The Council's Level 2 SFRA was published in January 2018 in support of the Council's public consultation on the draft Local Plan. During this consultation, the EA confirmed that the new Lower River Thames model (Hambledon to Teddington) had been reviewed and finalised, and certain modelling outputs could now be made available to the Council. The Environment Agency recommended that the Council updates the SFRA Level 1 and Level 2 assessments with the new information prior to formally submitting the local plan and supporting evidence to the Secretary of State.
- 10.3 The EA also raised specific concerns about the Byfleet Road site in New Haw particularly given the absence of detailed modelling (including climate change modelling) for the site. The Council worked with Surrey County Council to obtain the detailed Rive Ditch modelling in April and has updated the SFRA level 2 assessment for this site accordingly with the specific aim of overcoming the concerns raised by the Environment Agency.
- 10.4 The level 2 SFRA has now been updated to reflect the new modelling outputs from the Rive Ditch and Lower Thames Model. The Council is committed to refreshing the Level 1 SFRA once all of the modelling outputs for the Lower Thames Model have been released in line with advice from the Environment Agency.
- 10.5 **Outcome 2-To produce robust flood risk policies based on sound local evidence which seek to reduce flood risk in the Borough overall, factoring in the impacts of climate change:** Policy EE13 in the draft Local Plan is considered to be particularly relevant in achieving this outcome.
- 10.6 **Outcome 3-To steer new development to areas with the lowest probability of flooding wherever possible during the Plan period and ensuring that if development is concluded to be justified as necessary in areas of higher risk, that such developments will be safe for their lifetime, taking into account the vulnerability of their users, without increasing flood risk elsewhere, and where possible, reducing flood risk overall.** The Council has carried out a Strategic Sequential Test to support the identification of suitable sites which could be allocated in the Local Plan to meet identified development needs. This has assessed all sites which have been promoted through the Local Plan process. The methodology for the Strategic Sequential Test was agreed with the Environment Agency.
- 10.7 The Council's Site Selection Methodology and Assessment has also comprehensively assessed sites in terms of their Green Belt performance, the existence of constraints (including flood risk) which could affect their development potential and a range of sustainability criteria. Following this methodology has assisted the Council in drawing rounded conclusions on which sites are the most suitable for allocation in the Local Plan.

Chapter 11: Infrastructure

- 11.1 Outcome 1-To understand through the preparation of evidence whether any infrastructure improvements/additional capacity is required to support development proposed in the Local Plan:** Since the production of the January 2018 DtC update statement which reported on the partnership working and publication of the Infrastructure Delivery Plan (IDP), cooperation with partners in this area has mainly focussed on the work carried out to produce Statements of Common Ground (SOCG) which underpin the Local Plan (see chapter 2 for more information about Statements of Common Ground) and during joint working as part of production of the Council's Water Cycle Study. In regard to the latter, during the course of the Council's January 2018 consultation on the draft Local Plan, the Environment Agency raised concerns about the soundness of the Local Plan, stating that it was not clear if there would be sufficient infrastructure capacity to accommodate the increase in effluent flow from Local Plan growth which in turn could lead to environmental problems through sewer flooding. These concerns were expressed following the review of the Council's Outline Water Cycle Study Technical Note which had been published in support of the draft Local Plan consultation.
- 11.2 Following the consideration of the Environment Agency's comments, the Council has worked with Thames Water to resolve the concerns raised about infrastructure capacity which especially related to the Longcross Garden Village site. A Utilities Workshop was held with relevant partners including Thames Water on 23rd February 2018 as part of the wider Longcross Garden Village Pre application discussions where the matter was discussed in more detail and on 21st March, Thames Water wrote to the Council to confirm that, 'The business plan takes into account proposed growth in Runnymede and Thames Water are confident that necessary network and treatment works upgrades can be delivered alongside development' (see appendix 1). The letter received by Thames Water was forwarded to the Environment Agency for their information and the Outline Water Cycle Study was finalised, taking into account the additional discussions with Thames Water. The Council is therefore confident that these concerns have been overcome but will be seeking confirmation from the Environment Agency during the final round of public consultation on the draft Local Plan that their concerns have been overcome.
- 11.3 Outcome 2-To allow all new and existing development to be supported by the appropriate range and level of infrastructure provision. This will be achieved through the development of an agreed set of infrastructure frameworks:** Through the preparation of the SoCG with Surrey County Council (SCC) a number of infrastructure projects have been identified from the IDP where SCC will be responsible for infrastructure delivery. The projects identified and agreed between RBC and SCC have been listed in a schedule attached to the SoCG. Proactive engagement with key infrastructure providers during the course of Plan preparation has helped ensure that partners are aware of the scale and phasing of proposed growth so that infrastructure delivery can be properly planned for to allow sustainable growth in the Borough over the period of the Local Plan.

- 11.4 The Council has set out the infrastructure projects identified in the IDP and Addendum in a series of Infrastructure Schedules which align to 5 year phases of the Local Plan and its housing trajectory. The Schedules are based on the timing and costs of the projects identified in the IDP and Addendum. These infrastructure schedules were published in May 2018.
- 11.5 **Outcome 3-To produce an Open Spaces Study (OSS) to update the Study produced in 2010:** Study completed and published in 2015. Following comments made by Sport England during the IOPA consultation which advised the Council that a separate Playing Pitch Strategy was also required to be produced, this study was commissioned in 2017 and published on the Council's website in April 2018. Sport England was proactively engaged with during the preparation of the Playing Pitch Strategy. Sport England will be asked to confirm during the course of the draft Local Plan consultation part 2 whether they are satisfied that the Council has now addressed all of their previous comments.
- 11.6 **Outcome 4-To meet identified open space needs suggested by evidence collected in the 2015 OSS:** Policies SL26 and SL28 in the draft Local Plan seek to ensure that identified open space needs are addressed over the period of the Local Plan. During the drafting of these policies, engagement with Sport England took place and Sport England will be asked to confirm during the course of the draft Local Plan consultation part 2 whether they are satisfied that their consultation comments have been addressed by the Council.
- 11.7 **Outcome 5-To improve the quality of Runnymede's open spaces and look to retain open spaces that have not been identified as surplus to requirements in order to meet the needs of the Borough:** Policy SL25 in the draft Local Plan seeks to protect, maintain and enhance existing open spaces to encourage quality and accessibility in order to ensure a continued contribution to the health and well-being of local communities. During the drafting of this policies, engagement with Sport England took place and Sport England will be asked to confirm during the course of the draft Local Plan consultation part 2 whether they are satisfied that their consultation comments have been addressed by the Council.

Chapter 12: Heritage

Duty to Cooperate objectives for heritage matters and the Council's progress in achieving them

- 12.1 Since the January 2018 DtC update statement was published, Runnymede Borough Council has had engagement with Surrey County Council and Historic England during the Regulation 19 consultation on the draft local plan. Previously both the County Council and Historic England were given the opportunity to comment on the policies during and following drafting, and the policies were amplified and/or modified as a result of comments received from both bodies. As a result of this informal engagement the heritage policies as contained in the draft local plan were favourably received by Surrey County Council and Historic England during the formal consultation.
- 12.2 Further engagement has taken place with Surrey County Council following the close of the consultation, during the process of considering the representations made. Issues were raised regarding specific local heritage assets and informal engagement helped to draw these out.
- 12.3 In terms of the outcome which the DtC Scoping Framework indicates that the Council is seeking to achieve with regard to heritage over the period of the Local Plan, it is considered that as a result of the co-operation between the Council, Surrey County Council and Historic England, a set of policies have been published which will not only ensure the avoidance of harm to the Borough's heritage assets over the period of the Local Plan, but will also seek, where appropriate, to sustain and enhance the asset and provide a sustainable future.

Chapter 13: Waste and Minerals

- 13.1 The September 2017 Duty to Cooperate Review clarifies that the outcome which the Council is seeking to achieve is to ensure that RBC avoids the sterilisation of minerals assets in the Borough and does not compromise the operation of existing waste sites in the Borough through the development of policies and proposals in the Local Plan.
- 13.2 In this regard, the Council has engaged with Surrey County Council during the preparation of the Local Plan, in particular during the preparation of the Strategic Land Availability Assessment and Green Belt Review (2014) work to ensure that both pieces of evidence accounted for minerals and waste designations which exist in the Borough. Surrey County Council has also reviewed Minerals Assessments submitted by land promoters during Local Plan consultation events.
- 13.3 The Council's Site Selection Methodology and Assessment has also considered minerals and waste designations as part of its assessment criteria.
- 13.4 The Council continues to engage with Surrey County Council as they prepare a new Waste Local Plan for the County and are attending a workshop in June 2018 to discuss the emerging waste plan in more detail.

Chapter 14: Heathrow

- 14.1 The September 2017 Duty to Cooperate Review clarified that the outcome being aimed for in relation to Heathrow Airport is to minimise the impacts from airport expansion on those who live, work and visit Runnymede.
- 14.2 Due to the unique scope of potential impacts from the proposed expansion of Heathrow, the Council formed a partnership, the Heathrow Strategic Planning Group with host and adjacent authorities of the airport in the region. Previous terms of reference and MoUs guided the work of the HSPG, and as that work developed, greater political oversight was considered necessary. The updated work of the HSPG and the new Member led governance structure was achieved through the production of a new Accord. The basis of the HSPG Accord was agreed in October 2017 with the 12 partners executing their agreement in the following months with the final party agreement (Buckinghamshire County Council) secured in March 2018. The Accord will guide cooperation in respect of the planning approach to Heathrow expansion, develop and promote a vision for an expanded Heathrow and the wider area and build partnerships to lobby and be a collective voice while sharing information and expertise. Specific outcomes and outputs are described in the Accord including the development of a non-statutory joint planning 'strategy' supported by a joint evidence base across the HSPG area to shape and frame the Heathrow Airport Limited Development Consent Order application.
- 14.3 Runnymede continues to be an active member of the Heathrow Strategic Planning Group and attends meetings on a range of topics on a regular basis.
- 14.4 Given that the plans for expansion at Heathrow Airport have not yet been confirmed, and as such, the impacts on the surrounding area, including Runnymede have not been quantified, it has not been possible for the Local Plan to fully address the potential implications. It is considered that at the first review of the Local Plan there will be a greater level of certainty which can therefore be addressed in the production of any updated evidence and in any amended Local Plan policies.
- 14.5 In the meantime, as referenced in paragraph 14.2 above, a Joint Evidence Base and Infrastructure Study (JEBIS) is being produced by the HSPG spatial planning sub group. The purpose of this work is to provide an evidence base for the Local Authorities around the airport (including Runnymede) on the potential economic development, labour market and housing needs arising from the proposed expansion of the airport and how that relates to the background growth for which the authorities are already planning. The JEBIS is not intended to provide a planning framework for the surrounding authorities – it will be up to them individually and collectively as to how they wish to use the evidence base. The work is intended to be 'non-spatial' in that it will not make any specific recommendations on the distribution of any growth – this will again be a choice for the authorities arising from the evidence, their own evidence and local plans and any future joint working. Work on the JEBIS commenced in February 2018 and is due to be completed this summer. It will be discussed at this point whether a second phase of work could be the production of a Joint Spatial Planning

Framework (JSPF).

Chapter 15: Conclusions

- 15.1 During the production of the Runnymede 2030 Local Plan, the Council has been committed to undertaking active and ongoing engagement with a wide range of partners to achieve the outcomes set out in the 2015 Duty to Cooperate Scoping Framework (and as amended in some cases as part of the September 2017 Duty to Cooperate Review).
- 15.2 As the Council moves closer to the submission of its Local Plan to the Secretary of State, this DtC update statement seeks to confirm whether the Council has been successful in achieving the DtC outcomes which it set out to achieve in the interest of effectively addressing strategic matters of a cross boundary interest.
- 15.3 This statement updates the reader on key actions which have taken place since the last DtC update statement was published in January 2018 and also provides an overarching commentary on where outcomes have been achieved and where further actions are required. Overall it is considered that this Statement demonstrates that the Council has worked diligently to achieve its desired outcomes. In many cases, outcomes have been achieved. Where outcomes are yet to be achieved, the Council is committed to continued partnership working to achieve positive results.
- 15.4 Beyond the submission of the Local Plan to the Secretary of State, the statements of Common Ground and Memorandums of Understanding that the Council has entered into demonstrate the Council's commitment to continued partnership working in the interest of effectively planning for sustainable development across the wider sub region.



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21 March 2018

Runnymede Local Plan and Water Cycle Study

Dear Mr Lloyd-Davies,

I refer to your recent correspondence regarding comments from the Environment Agency raising concerns that the Local Plan does not reflect the evidence base and it is not clear that sufficient infrastructure capacity will be in place to accommodate the increase effluent flow from growth.

It is understood that the concern raised is in relation to the Longcross Garden Village site. I have provided further information below to clarify the position with regard to the delivery of wastewater infrastructure in relation to this site.

Wastewater Network Upgrades

As set out in our response to the draft Local Plan consultation we have suggested amendments to Policy SD6 to ensure that development is not occupied until any necessary network upgrades are delivered. Where there are concerns planning conditions could be used to ensure that development is not occupied in advance of the delivery of infrastructure. An example of a potential planning condition that could be used is provided below:

"[No properties/No more than X properties] shall be occupied until confirmation has been provided to the Local Planning Authority that either:

- all wastewater network upgrades required to accommodate the additional flows from the development have been completed; or*
- a housing and wastewater infrastructure phasing plan has been agreed with Thames Water.*

Where a housing and wastewater infrastructure phasing plan is agreed development shall take place in accordance with the plan unless otherwise agreed in writing by the Local Planning Authority.

Reason - The development may lead to sewage flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents."

The above approach would help ensure that development is delivered alongside any wastewater network infrastructure required to support it and would address the delivery of network upgrades required for Longcross Garden Village or other development sites.

It is emphasised that in relation to Longcross Garden Village discussions have taken place with the developer and Thames Water will continue to liaise with the council and developer with

regard to the delivery of infrastructure and if necessary would seek conditions on future approvals to help ensure that the occupation of development is aligned with the delivery of infrastructure.

Wastewater Treatment Infrastructure

With regard to any necessary upgrades to Chertsey Sewage Treatment Works required to accommodate flows from Longcross Garden Village or other sites within the catchment, these would be funded and delivered through the Asset Management Plan process. Thames Water are required to deliver any necessary upgrades alongside development and use Local Plan growth figures alongside other factors to determine when any upgrades will need to be delivered.

As set out above Thames Water have been involved in discussions with the developer and based on the proposed phasing of development put forward we do not have concerns regarding the ability to provide necessary upgrades in time to serve the development. The proposed levels and phasing of development at Longcross and within the whole borough are being taken into account in preparing our business plan for AMP7 which will run from the 1st April 2020 until the 31st March 2025.

Local Plan and Water Cycle Study Comments

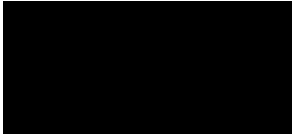
Within our response to the Local Plan consultation we highlighted concerns regarding Longcross Garden Village. I would highlight that productive discussions have taken place with the developer as set out above and at present Thames Water are confident that development can be delivered alongside growth in relation to this site. In addition, there is potential to use planning conditions at the application stage to ensure that any necessary upgrades are aligned with development to avoid any adverse impacts such as sewer flooding or pollution.

Within the outline Water Cycle Study it has been noticed since responding to the recent consultation that text is provided on p45 which should be updated. Suggested amendments to the text in relation to wastewater infrastructure for Longcross Garden Village is set out below. These changes would ensure consistency with the latest position regarding the site.

*“TWUL has serious concerns regarding waste water services in relation to this site. Specifically, sewage treatment capacity in this area is unlikely to be able to support the demand anticipated from this development. ~~TWUL would recommend that the development is constructed at an alternative location where they can better provide the necessary services. Alternatively, TWUL may be requested to undertake detailed investigations which they would expect to take a number of years. During this period ongoing discussions with both the LPA and developer will be necessary to ensure the impact on TWUL assets is not prejudicial.~~ **Thames Water have been in discussions with the developer regarding the scale and phasing of development to understand the infrastructure requirements. Thames Water are currently preparing their business plan for AMP7 which will cover the period from 1st April 2020 until the 31st March 2025. The business plan takes into account proposed growth in Runnymede and Thames Water are confident that necessary network and treatment works upgrades can be delivered alongside development. Continued dialogue between Thames Water, the LPA and the developer is required to ensure alignment of development and wastewater infrastructure requirements.**”*

I trust the above and enclosed comments are satisfactory, but please do not hesitate to contact me if you have any queries.

Yours sincerely,



Richard Hill
Head of Property

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All enquiries about this paper should be directed to:

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