

From: Pete Holloway
To: [Planning Policy](#)
Subject: RBC 2030 Local Plan - Objection "Draft Local Plan Consultation"
Date: 22 February 2018 21:21:13

Dear Sir/Madam,

Re: Runnymede Local Plan

I would like to register my objection for any further developments in Rowtown, listed in the 2030 Local planning policy for Runnymede. Following the development of Strawberry Fields and various other constructions/developments in the Addlestone / Rowtown area.

My reasons are:-

Over development in Rowtown. Losing green belt land will create urban sprawl, when considering government policy not to develop until other possibilities have been explored and exhausted.

Infrastructure not in place for previous, present, or future development.

Increase in noise and pollution. Levels of noise and pollution are already becoming intolerable.

Traffic congestion. Over the last few years traffic passing through and around Rowtown has increased immensely, causing many problems to residents. Including, increase in noise and pollution, damage to roads, lack of parking facilities, concerns for pedestrian safety, all of which which creates misery for those living in Rowtown.

As well as the above I would also wish to object to the proposal for two traveller pitches on the Central Veterinary Laboratory area (4.7 hectares). Although I certainly am appreciative of the proposal for these to not be developed until after 2027, the impact that these site will have on the local community is worrying, not just from a further increase in traffic, a further drain on infrastructure but also a significant impact on the value of property in the area.

Rather than any effort to enhance and improve the living standards for all in the local area, this draft plan to over populate and remove green belt appears to look to deteriorate for all those who have resided here for many years.

Yours faithfully,

Mr P Holloway
6 Furze Road,
Rowtown,
Addlestone
KT15 1DP

From: Peter Shaw
To: [Planning Policy](#)
Cc: [REDACTED]
Subject: Representation form
Date: 22 February 2018 22:25:06
Attachments: [Model Representation form for Regulation 19 Word Doc.pdf](#)

Please find attached representation form for 2030 draft local plan.

Regards Peter Shaw

Representation Form for the Runnymede 2030 Draft Local Plan



Please return to **Runnymede Borough Council** by **Thursday 22nd February 2018**.

This form has two parts-

Part A – Personal Details

Part B – Your representation (s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	Mr	
First Name	Peter	
Last Name	Shaw	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	47 Hampton Rd	
Line 2	Teddington	
Line 3	Middx	
Line 4		
Post Code	TW11 0LA	
Telephone Number		
Email Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Policies Map

4. Do you consider the Local Plan is:

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Complies with the Duty to co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

This representation is being made in respect of site allocations, given that the 2030 plan shows a shortfall against the demand for residential housing. It is being made in respect of site 277 (The Old Chalet, Callow Hill, Virginia Water comprising 8 acres) which was submitted to the SLAA process in 2016 in response to the Council seeking further potential locations for removal from the green belt.

It only becomes relevant if the Planning Inspector is minded to further test the Council's submission to reduce the shortfall in housing provision.

The results of the SLAA process showed this site 277 performing better or equally as well to site number 258 located on the opposite side of Callow Hill. However at the final evaluation stage it failed in performance versus the green belt compared to site 258 which is proposed to be released.

I note that all the sites proposed to be removed from the green belt are larger than site 277 (approx 15 units). Given the location convenient to Virginia Water village & it's facilities including school, an opportunity is potentially being lost. Having come in at a late stage in the plan development process there is no opportunity to challenge the robustness of the councils view of our site's importance to the green belt. In this respect I consider the Council's submission unsound in efficiently meeting the housing demand. The reasons are site specific & covered in Section 6

(Continue on a separate sheet/expand box if necessary)

6. Please set out what modification (s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Arup Green Belt Review earlier in the process included sub area 71 which included the Old Chalet site (277) at the easterly end of a swath of land to the North of Christchurch Rd. It failed in that the whole sub area performed an important role in preventing encroachment into the countryside, in part due to the fact that the Northern boundary was weakly defined and challenging to identify.

The Old Chalet site is bounded by properties on 3 sides: to the NE by Virginia Beaches, SE by former Greywell estate properties and Callow Hill, SW by Christ Church and Old Christchurch Rd properties. The NW boundary is with the Crown estate and is (a) clearly delineated by a 19th century 1.5M wide ditch, and (b) that part of their estate is a managed coppiced woodland.

Given this it is hard to understand how The Old Chalet land plays such an important role in preventing the encroachment in the countryside and maintaining openness.

Without a review this cannot be tested.

(Continue on a separate sheet/expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To reinforce the need to test the soundness of the Council's view in respect of holding the green belt boundary as Callow Hill at a time when the government is desperate to get housing provision increased.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:

Peter J Shaw

Date:

22 Feb 2018

Notes to Accompany Model Representation Form

1. Introduction

1.1. The plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published plan when submitted, which will be examined by a Planning Inspector. The Planning and Compulsory Purchase Act 2004¹ (as amended) (PCPA) states that the purpose of the examination is to consider whether the plan complies with the legal requirements, the duty to co-operate and is sound.

2. Legal Compliance and Duty to Co-operate

2.1. The Inspector will first check that the plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

2.2. You should consider the following before making a representation on legal compliance:

- The plan in question should be included in the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the Local Development Documents (LDDs)² it proposes to produce. It will set out the key stages in the production of any plans which the LPA proposes to bring forward for independent examination. If the plan is not in the current LDS it should not have been published for representations. The LDS should be on the LPA's website and available at its main offices.
- The process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement (SCI) (where one exists). The SCI sets out the LPA's strategy for involving the community in the preparation and revision of LDDs (including plans) and the consideration of planning applications.
- The plan should comply with the Town and County Planning (Local Planning) (England) Regulations 2012 (the Regulations)³. On publication, the LPA must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The LPA must also notify the various persons and organisations set out in the Regulations and any persons who have requested to be notified.
- The LPA is required to provide a Sustainability Appraisal Report when it publishes a plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.
- In London, the plan should be in general conformity with the London Plan (the Spatial Development Strategy).

2.3. You should consider the following before making a representation on compliance with the duty to co-operate:

- The duty to co-operate came into force on 15 November 2011 and any plan submitted for examination on or after this date will be examined for compliance. LPAs will be expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the plan.

3. Soundness

¹ View at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

² LDDs are defined in regulation 5 – see link below.

³ View at <http://www.legislation.gov.uk/uksi/2012/767/contents/made>

3.1. Soundness is explained in paragraph 182 of the National Planning Policy Framework (NPPF). The Inspector has to be satisfied that the plan is positively prepared, justified, effective and consistent with national policy:

- Positively prepared: This means that the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- Justified: The plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.
- Effective: The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.
- Consistent with national policy: The plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

3.2. If you think the content of the plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy (or the London Plan)? If so it does not need to be included?
- Is what you are concerned with covered by any other policies in the plan on which you are seeking to make representations or in any other plan?
- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- If the plan is unsound without the policy, what should the policy say?

4. General advice

4.1. If you wish to make a representation seeking a modification to a plan or part of a plan you should make clear in what way the plan or part of the plan is inadequate having regard to legal compliance, the duty to cooperate and the four requirements of soundness set out above. You should try to support your representation by evidence showing why the plan should be modified. It will be helpful if you also say precisely how you think the plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

4.2. Where there are groups who share a common view on how they wish to see a plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.