Hearing Statement- Runnymede 2030
Local Plan Examination

Matter 3: Overall Spatial Strategy

On Behalf of SMECH Management Company Ltd

November 2018

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0.0 Introduction

0.1 This statement has been prepared by DPDS Consulting Group (DPDS) on behalf of SMECH Management Company Ltd in respect of its property interest at the Longcross Estate, Runnymede. It sets out the response to the questions included in Matter 3 of the Hearings Programme. This matter is in relation to the ‘Overall Spatial Strategy’.

0.2 DPDS has acted on behalf of SMECH Management Company Limited since February 2013 in respect of its property interest at the Longcross Estate, Runnymede. DPDS has engaged in the development plan process since that date and has made various representations to Runnymede Borough Council (RBC) in respect of both the former Runnymede Core Strategy and, more recently, the Runnymede 2030 Draft Local Plan.

0.3 Our previous representations have demonstrated that the plan does not comply with the requirements identified at section 20(5)(a) and (c) of the Planning and Compulsory Purchase Act 2004 and that it is not sound.

0.4 This statement should be read in conjunction with our previous representations to the Draft Runnymede Local Plan, part one and two. Hearing Statements have also been submitted on behalf of SMECH Management Company for Matters 1 (Legal requirements, the Duty to Co-operate and the Plan period) and 4 (Green belt boundaries and exceptional circumstances) of the Local Plan Examination.

0.5 DPDS welcome the invitation to appear at the Hearing Session to expand on the comments included in this statement and confirm that representatives from DPDS and our clients legal team will be attending the Hearing Session.

0.6 The Runnymede 2030 Local Plan was submitted on 31 July 2018 and subsequently paragraph 214 of the revised National Planning Policy Framework (NPPF) applies. References to the NPPF in this Hearing Statement refers to the 2012 version. The section of the PPG on Local Plans states: “Where plans are being prepared under the transitional arrangements set out in Annex 1 to the revised National Planning Policy Framework, the policies in the previous version of the framework published in 2012 will continue to apply, as will any previous guidance which has been superseded since the new framework was published in July 2018.” Unless otherwise indicated references to the National Planning Practice Guidance (NPPG) are to guidance that was published prior to the publication of the revised NPPF in July 2018.
1.0 Response to Matter 3

Q3.1 Is the Plan’s overall framework for the roles that will be played by various parts of the Borough in meeting development needs and protecting and, where possible, enhancing the environment sound? In particular:

a) Is the broad apportionment of housing, economic and other development to the various centres and locations throughout the Borough consistent with the Plan’s spatial vision and objectives?

1.1.1 No. As noted in paragraph 5.31 of the submission Runnymede 2030 Local Plan (CD_001) confirms that “...Longcross will become the focus for a major residential led development which will create a new sustainable mixed use settlement...”. The Longcross Garden Village allocation (policies SD2 and SD10) therefore forms a key part of the Local Plan spatial vision. However, allocating the site causes conflict with the Local Plan environmental objectives 6-11 set out in paragraph 5.7 of the Local Plan.

1.1.2 Paragraph 5.28 of the submission Runnymede 2030 Local Plan states that “National policy on the location of development is driven by the principles of sustainable development.”

1.1.3 The Longcross Garden Village is not sustainable due to the distances involved from the site to main services that residents would need to have access to. Longcross Garden Village is incapable of providing the infrastructure to support genuinely sustainable transport choices that is fundamental to achieving modal shift from the private car and there is insufficient evidence to demonstrate that the proposed allocation can deliver the highway infrastructure critical to the delivery of the development. Residents of the proposed settlement will still have to make a significant number of journeys not just for access to services but also for access to employment.

1.1.4 We consider that the spatial development strategy as set out in policy SD2 does not protect or (where possible) enhance the environment. Our representations to the consultations on the Runnymede 2030 Local Plan discuss in detail our concerns regarding policy SD2.

1.1.5 These matters as a whole are discussed in detail in our representations to the consultations on the Runnymede 2030 Local Plan.

1.1.6 The plan is not based on the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; and is therefore not ‘justified’

b) Is it based on robust evidence, consistent with national planning policy, and is it deliverable?

1.1.7 No. As set out in our representations to the consultations on the Runnymede 2030 Local Plan we consider that the evidence base is at a point now where it is very difficult to clearly and concisely understand how the evidence base has exactly informed (or not informed) the Local Plan. This is because there have been different iterations of evidence documents, such as the Habitats Regulations Assessment. Our previous representations discuss particular keys evidence base documents in detail specifically the following:

- Sustainability Appraisal/ Strategic Environment Assessment (SD_018D to SD_018R)
1.1.8 For the reasons set out in our representations, we therefore consider that the Local Plan and its accompanying evidence base is contrary to paragraph 156 of the NPPF (2012) which states:

“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area...”

1.1.9 It is noted that paragraph 5.21 of the submission Runnymede 2030 Local plan states:

“It should be noted that throughout the preparation of the Local Plan, the Council has worked with partners to ensure that planned growth in Runnymede is considered in the context of the wider growth that is anticipated to come forward in the surrounding area to ensure that cumulative impacts are understood. This has been particularly relevant in the preparation of the infrastructure and transport evidence which has underpinned the preparation of this Local Plan. The results of this work have informed the spatial strategy.”

1.1.10 Although it is appreciated that the council has engaged with partners to discuss growth and associated infrastructure. If statutory consultees have concerns regarding infrastructure provision regarding a particular site (specifically Longcross Garden Village) then this should have informed the spatial strategy. This has clearly not been the case. This is discussed in more detail in our response to question 3.1 d) below.

1.1.11 Therefore the submitted Runnymede 2030 Local Plan is not sound as it is not ‘justified’, ‘effective’ and ‘consistent with national policy.’

c) Does it take proper account of potential impacts on the natural environment, landscape, flood risk, air quality and other matters and provide for mitigation where necessary?

1.1.12 No. As set out in our representations to the consultations on the Runnymede 2030 Local Plan we are concerned that the Local Plan (including its spatial vision):

- Has not taken proper account of its Impact on European designated sites (this is discussed in our response to Q1.2 for Matter 1 and also in our representations to the consultations on the draft Runnymede 2030 Local Plan.)
- Is based on a conclusion that likely significant effect on the two European sites through disturbance can be mitigated by provision of SANG, and yet does not contain policies or proposals which will ensure the delivery of sufficient SANG; that national and local sustainable transport policies would need to be successful to improve air quality (as models
predict); and that monitoring demonstrates air quality is not improving then further action is required.

- As a whole, and the Longcross Garden Village housing allocation (the largest housing allocation in the draft Local Plan), will inevitably result in an increase in the concentration levels of nitrogen dioxide emissions on the strategic highway network.
- Fails to reflect the position that waste water infrastructure may not be sufficient during the whole of the plan period. Note that the Environment Agency as set out in their representation to the consultation on the Runnymede 2030 Local Plan Part 2 highlight similar concerns and also concerned that there could be a deterioration of Water Framework Directive class.
- Fails to sufficiently take into account the impact that allocated sites (specifically Longcross Garden Village) will have on heritage assets.

1.1.13 In conclusion, we consider that the Local Plan does not take proper account of potential impacts on the natural environment and air quality neither does it provide for effective mitigation where necessary.

1.1.14 Therefore the submitted Runnymede 2030 Local Plan is not sound as it is not ‘justified’ and ‘effective’.

d) Have the strategic infrastructure constraints and needs been adequately assessed and is there reasonable confidence that they will be addressed in a timely manner?

1.1.15 No. The borough council have submitted what they consider to be a ‘sound’ Local Plan, however, it is concerning that at this late stage in the evolution of the Local Plan that there are soundness concerns from statutory consultees with regards infrastructure constraints/provision.

1.1.16 The Environment Agency in their representations to the consultation on the draft Local Plan earlier this year concluded that at that time they considered the Local Plan to be ‘unsound’ for a number of reasons. One of the reasons was whether 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. The Environment Agency in their representations to the Runnymede 2030 Draft Local Plan Part 2 consultation outlines infrastructure associated with an allocated site (Longcross Garden Village) “is still highlighted as a risk and requiring further investment by Thames Water to provide services to this location.”

1.1.17 Highways England as outlined in their representation to the Runnymede 2030 Draft Local Plan Part 2 consultation also consider that the Local Plan is not sound.

1.1.18 Surrey County Council (as Local Highway Authority) in their representations to the consultations expressed concerns regarding the cumulative transport impacts of the proposed new development on the A320.

1.1.19 It is also noted that RSPB in their representations to the consultations on the draft Runnymede 2030 Local Plan have soundness concerns regarding SANG provision.

1.1.20 It is also noted in the council’s Statement of Consultation (SD_0161) that Statements of Common Ground with the Environment Agency and also Highways England will be prepared where identified concerns cannot be fully resolved. It is unclear whether these Statements of Common Ground have been prepared, this again is very concerning.
1.1.21 In the context of Longcross Garden Village, as a key element of the spatial strategy, there are concerns over the viability of schemes (as analysed in viability evidence base documents SD_013A and SD_007P) as there is unlikely to be the quantum of development or critical mass required to support such a range of infrastructure elements on or close to the site.

1.1.22 In our representations made to the consultation on the draft Local Plan, we highlighted that in the case of Longcross Garden Village, to provide all of the additional infrastructure elements to support the development would equate to approximately £800,000 to £1,000,000 per dwelling. These concerns can equally be applied to the other allocated sites and therefore bringing into question issues surrounding the spatial strategy.

1.1.23 It is unclear how specific projects will be funded without either significant central government investment which is not guaranteed, or passing the costs onto developers within the borough through CIL or S106 agreements.

1.1.24 It is of note that the Local Plan at policy SD6 (Infrastructure Provision and Timing) includes wording with regards to critical infrastructure projects whereby the council may instead grant permission with conditions or planning obligations restricting occupation until completion of critical infrastructure projects or phases. Although this wording is included within policy SD6, this highlights that the council themselves have doubts about strategic infrastructure constraints being addressed in a timely manner. We are concerned that the Runnymede 2030 Local Plan will not lead to genuinely plan-led scenario and therefore it is not consistent with paragraph 17 of the NPPF (2012).

1.1.25 Granting permission, particularly for the allocated sites such as Longcross Garden Village, with conditions restricting occupation until completion of critical infrastructure or phases is contrary to the plan-led approach. It emphasises the question marks over the deliverability of the allocated sites, such as Longcross Garden Village, and our view that the site should not be allocated for housing.

1.1.26 The use of such conditions, if permission was granted, could also result in the delivery of housing completions on the site being significantly delayed and not in line with the borough council’s suggested trajectory for the site. Delays to the housing completions could affect the borough council’s 5 year housing land supply.

1.1.27 We therefore consider that there is not reasonable confidence that strategic infrastructure constraints can be addressed in a timely manner. Due to the issues outlined above this could undermine the deliverability of the plan. We therefore consider the Local Plan would not be consistent with paragraph 173 of the NPPF (2012) which states:

“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”
1.1.28 Therefore the submitted Runnymede 2030 Local Plan is not sound as it is not ‘justified’, ‘effective’ and ‘consistent with national policy.’