Representations on behalf of
The Gribble Family
In respect of land at Pyrcroft Road, Chertsey etc (Site SL6)
relating to the
Runnymede 2030 Draft Local Plan Examination
Matters 1 to 4

Matter 3

November 2018
MC 1414/18
Matter 3 Overall Spatial Strategy

Introduction

These representations are made by Carter Planning Limited (CPL) for the Stage 1 Hearing in respect of the Runnymede Local Plan 2030 Examination, on behalf of the land owners of most of site SL6 Pyrcroft Road, Chertsey, the Gribble Family.

CPL is promoting the development of land at Pyrcroft Road, Chertsey Policy SL6. Discussions with the Council have been held with a view to the submission of a planning application for the required circa 175 dwellings early in the plan period. Much technical work demonstrating the sites availability, suitability and achievability has already been carried out. Plans of how CPL envisage the development taking place are included as an Appendix to these representations, as this usefully identifies the location of the site and shows how the development area would relate to its surroundings. This area was previously a reserve housing site R3 in the adopted Local Plan 2001. However our original representations go further and explain how a larger area of land to the west in a sustainable location under our Clients control could also be developed to assist with any overall shortfall in housing or to replace any other sites which may not come forward.

Note: Under Matter 3 our comments are made in respect of the soundness of the overall spatial strategy. Our comments on the review of the Green Belt which will be considered under Matter 4 and site specific matters will be dealt with in Part 2 of the Examination.

Matter 3 Overall Spatial Strategy

3.1 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?
   b) Is it based on robust evidence, consistent with national planning policy, and is it deliverable?
   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?
   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?
The spatial vision in paragraph 5.6 is generalised but laudable, making provision for housing and business, protecting the environment, supplying infrastructure and planning for sustainability.

As set out elsewhere we remain concerned that the Plan does deliver the new homes that are needed overall. Paragraph 5.8 refers.

It must be right to concentrate development in the existing urban areas but we welcome the Council’s recognition that these alone cannot provide for all the development needs and hence the recognition of a need to release a number of sites from the Green Belt. Where we disagree is the quantum of this release which is inadequate. Paragraph 5.9 refers.

We agree that the Exceptional Circumstances do exist to change the Green Belt boundaries as there are insufficient sites in the urban area and the additional growth will not be accepted by adjoining Authorities. Paragraph 5.10 refers.

Lastly we agree that urban extensions should be sustainably located and avoid important environmental areas. Paragraphs 5.11 to 5.13 refer.

The Spatial Development Strategy in Paragraphs 5.19 to 5.20 are useful general indications of key strategic locations and designations.

Paragraphs 5.28 to 5.33 are largely descriptive and a useful summary of the situation. We agree that Chertsey is one of the settlements that benefits from the greatest concentration of services and facilities with the highest levels of accessibility with the greatest opportunities to absorb future growth. Paragraph 5.32 refers.

However we do have concerns about the level of detail included in the Table 1 to Policy SD2. The first two paragraphs as per the Policy would be sufficient. The Table imposes an unnecessary target or constraint at too detailed a level. The inclusion of an updated Table 2 would suffice.

It would be preferable if the Policy simply stated that growth aspirations will largely be directed towards locations in and around the most sustainable, larger settlements in Runnymede and towards the garden village at Longcross. These include Chertsey and are considered to be the best locations for delivering supporting infrastructure as well as active and sustainable travel choices.

As stated in other representations we do not believe that the Local Plan makes adequate housing provision overall. The 7629 houses provided in Table 2 for the period 2015 to 2030 is likely to be an underestimate.
The reasons for this in part come from the overall requirement but also from the deficiencies evident in Tables 1 and 2 of Policy SD2.

We have reservations about a number of components of the Tables.

However if the land we are suggesting to the south or rear of Grange Farm is added to that area and to the reserve housing site at Pyrcroft Road the figure of 1972 could be increased to offset some of the shortfall. Site 60, SLA 6 Pyrcroft Road can be enlarged westwards (in addition to the hatched area on Site 60), to further contribute to meeting housing need the provision for which at 509 dwellings per annum is still likely to be inadequate.

The indicative assessment of housing need based on the proposed formula 2016 to 2026 was 557 dwellings per annum. It should however be noted that the level of growth of 509 dpa is around 50 homes per annum lower than the figure proposed by the new standardised methodology for calculating housing need (557 dpa). The proposed approach sees a substantially larger increase needed to address market signals.

Further there is no explanation of the role of affordable housing. The GL Hearn Strategic Housing Market Update from January 2018 has calculated a net need for 471 affordable homes per annum in Runnymede for the 2013-36 period. On a like for like basis this represents a small increase in the Borough’s affordable housing need from that set out in the 2015 SHMA.

In addition the calculations in Table 2 do not include any examination of the effects of a third runway at Heathrow Airport (other than a brief reference in proposed modification 7 in document CD-001A) or the effects of Brexit etc.

The Table does not include any explanation of how the relationship between student accommodation and general housing or the interrelationship between C2 and freeing up general housing.

The Table also appears to include either a large element of windfalls or assumes there have been completions already. The intention of any Local Plan is to reduce any windfall figure as far as possible and provide certainty.

Individual figures themselves, such as the extent to which Longcross can deliver housing

No discussion is included for the persistent under delivery of housing over previous years.

Notwithstanding our concerns about the Council’s overall expected housing delivery, which seems optimistic, there appears to be a shortfall of dwellings over the period
of the Plan. Our conclusions are that the Plan needs to make at least adequate housing provision for its needs and that with an analysis of the components of Table 1 the housing provision is likely to be inadequate.

The detail of Table 1 should be omitted and Table2 should be updated with a more realistic assessment of housing need and also dwelling yield from the various categories sufficient to provide a total which meets and exceeds genuine overall housing requirements. Because there has been persistent housing under delivery a suitable buffer should be included.

We do agree that the Plan has taken proper account of potential impacts on the natural environment, landscape, flood risk, air quality and other matters and provide for mitigation where necessary. Our Clients site can provide SANG.

We also agree that the strategic infrastructure constraints and needs have been adequately assessed, such as in the A320 mitigation document and there is reasonable confidence that they will be addressed in a timely manner.
Plan of Site 60 with Grange Farm

Area at Grange Farm to be added to Housing Site

Area suggested by these representations to be added to Housing Site

Runnymede draft Site Capacity Analysis (May 2017)