Runnymede Local Plan Examination – Main Matters Issues and Questions

Main Matter 3 – Overall Spatial Strategy (Policy SD2, Paragraphs 5.8-5.13, 5.19-5.21, 5.28-5.36)

Representor reference number: 2288

WYG on behalf of Kitewood Estates Limited
Runnymede Local Plan Examination – Main Matters Issues and Questions
Main Matter 3 – Overall Spatial Strategy (Policy SD2, Paragraphs 5.8-5.13, 5.19-5.21, 5.28-5.36)

1. This statement has been prepared by WYG on behalf of our client, Kitewood Estates Ltd (Kitewood). It should be read in conjunction with representations upon the submitted plan, dated June 2018 (Representation ID: 2288).

2. Kitewood’s concerns from previous representations remain unaddressed. These relate to an inadequate supply of housing to meet identified needs, the spatial strategy particularly the lack of provision within Woodham/New Haw and the methodology used for the Green Belt Review.

3. Kitewood are particularly concerned about the omission of the 12.8 hectare site under their control at Wey Manor Farm, New Haw (SHLAA Ref: 129). The site can deliver a minimum of 220 dwellings, including a significant proportion of affordable housing. The additional uses could include; Employment (B-Classes), retail and leisure-uses (Classes A1-A4 and D1), alongside complementary Class C2 and D1 residential and non-residential institutions (i.e. Care Homes, Doctor’s Surgeries and Nurseries). Kitewood retain a flexible approach to the additional uses provided on site and are keen to work with the Council to identify and deliver uses which would assist in meeting any shortfall or deficiency identified in the submitted plan. The site can also deliver, as a minimum, policy compliant SANG and open space. A context plan and Concept Masterplan for the development of this site are enclosed at Appendix 1.

4. In conformity with the Inspector’s Guidance Note (ID-01) we have framed our response within the context of the 2012 version of the NPPF against which the plan should be assessed, paragraph 214 2018 NPPF. We do, however, reference the 2018 NPPF to explain the Government’s desired direction of travel upon certain issues.

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?

5. No. In relation to new housing the plan’s spatial vision and objectives provide few spatial references other than the creation of a new garden village at Longcross. There are, however, references to ‘sustainable growth’, sustainable travel choices and reductions in greenhouse
gas emissions. The background text within the submitted plan (CD-001) builds upon this noting;

"The spatial strategy for Runnymede is to continue to focus development in the Borough’s existing urban areas over the period of the Local Plan...” (paragraph 5.9);

"In arriving at its spatial strategy, sustainability has remained at the heart of the process...” (paragraph 5.11);

"National policy on the location of development is driven by the principles of sustainable development. With this in mind, the Local Plan builds on the existing settlement pattern in the Borough, focusing the largest amounts of residential growth primarily in Addlestone, Chertsey, Egham and their suburbs...” (paragraph 5.28) and

"Lower levels of growth will be expected to be accommodated within the local centres of Virginia Water, Woodham/New Haw, Englefield Green and Ottershaw, respecting and maintaining their position in the centre hierarchy. Residential development in these areas will come forward through redevelopment within the urban area and on urban extensions, with limited scope for additional retail and employment development, beyond the allocation at the Byfleet Road site in New Haw.” (our emphasis, paragraph 5.29)

6. In terms of the local centres Virginia Water and Woodham/New Haw are the largest of these centres (paragraph 3.17) with Englefield Green and Ottershaw being smaller centres (paragraph 3.10).

7. It is considered appropriate that the broad apportionment of housing growth should be focused in the towns of Addlestone, Chertsey and Egham. However, the Council’s proposed distribution of housing does not reflect the hierarchy between larger and smaller local centres. It also takes little, if any, account of accessibility to public transport and employment opportunities, key aspects of both the 2012 and 2018 versions of the NPPF.

8. The broad apportionment of new housing, retail and employment growth, as amended by minor modifications 11 to 21 (CD-001A), is set out within Policy SD2 and is summarised below.

9. Overall the apportionment of housing growth between the largest Local Centres and the smaller Local Centres is disproportionate. Just 7.3% of overall housing growth is focused upon the largest Local Centres compared to 10.1% in the smaller Local Centres. This position is exacerbated when considering Woodham/New Haw where only 1.4% of overall housing growth is apportioned, this is less than half of any other Local Centre and only marginally greater than the village of Thorpe. This contradicts the statement in paragraph 5.29 of the plan which identifies that the level of development within local centres will respect and maintain their position in the hierarchy.
Table 1: Development split between settlements

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Minimum Housing Growth (dwellings(^1))</th>
<th>% overall(^2)</th>
<th>Employment floorspace (sqm)</th>
<th>% overall</th>
</tr>
</thead>
<tbody>
<tr>
<td>Addlestone including Rowtown</td>
<td>1,271</td>
<td>16.7</td>
<td>11,700</td>
<td>14.5</td>
</tr>
<tr>
<td>Chertsey including Chertsey South</td>
<td>2,179</td>
<td>28.7</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Egham, including the area of Staines upon Thames located in the Borough</td>
<td>841</td>
<td>11.1</td>
<td>41,580</td>
<td>51.6</td>
</tr>
<tr>
<td>Longcross</td>
<td>1,738</td>
<td>22.9</td>
<td>7,350</td>
<td>9.1</td>
</tr>
<tr>
<td>Virginia Water</td>
<td>444</td>
<td>5.8</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Woodham and New Haw</td>
<td>109</td>
<td>1.4</td>
<td>20,000</td>
<td>24.8</td>
</tr>
<tr>
<td>Englefield Green</td>
<td>494</td>
<td>6.5</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Ottershaw</td>
<td>277</td>
<td>3.6</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Thorpe</td>
<td>74</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Estates renewal (Council owned land)</td>
<td>145</td>
<td>1.9</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>23</td>
<td>0.3</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>7,595(^3)</strong></td>
<td><strong>100</strong></td>
<td><strong>80,630</strong></td>
<td><strong>100</strong></td>
</tr>
</tbody>
</table>

Source: Runnymede Borough Council, WYG analysis

10. In contrast, Woodham/New Haw is anticipated to deliver nearly a quarter of the overall employment floorspace identified in the plan. It is not envisaged that the other Local Centres will deliver any employment floorspace. Paragraph 37 of the 2012 NPPF is clear that;

"Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities."

11. The 2018 NPPF, paragraph 103, builds upon this;

"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes...” (our emphasis).

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\(^1\) Inclusive completions and C2 older accommodation.

\(^2\) Does not add due to rounding

\(^3\) It should be noted minor modification 21 identifies a total of 7,594 dwellings, this is presumed to be a typo.
12. Given this context of promoting sustainable patterns of growth and the significant level of employment floorspace proposed in Woodham/New Haw the lack of housing growth is surprising.

13. Furthermore, as discussed within paragraph 2.5 of our client’s comments upon the submitted plan, proximity of Woodham/New Haw to Woking should be taken into consideration. This is particularly relevant given that Woking are currently struggling to meet their own housing need. Whilst it is believed they are looking towards Waverley and Guildford to assist the Statement of Common Ground between the two authorities, signed 18th May 2018, clearly indicates both Council’s are committed to working together to address strategic housing matters of cross boundary significance, such as unmet housing need. The Woodham and New Haw area is situated near Woking settlements of Byfleet and West Byfleet and as such would constitute an appropriate location for such development.

14. The broad apportionment of housing growth is not soundly based. It does not follow the settlement hierarchy described within the supporting text (paragraph 5.29) nor does it provide a coherent approach between the location of new housing and employment opportunities. Given the need to promote sustainable patterns of growth it is recommended additional housing is provided within Woodham/New Haw. In this respect our client’s site at Wey Manor Farm can deliver a minimum of 220 dwellings in a sustainable location.

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

15. No, Kitewood remain concerned about the distribution of development and the site selection process including the methodology and conclusions from the Green Belt Review and Sustainability Assessments carried out by the Council and its consultants.

16. The issue of the broad distribution of development is covered in response to part ‘a’ of the Inspector’s question above. With regards to the Green Belt Review I refer the Inspector to our matter 4 statement and the comments made on behalf of Kitewood on the submitted version of the plan. This included an appendix looking at the impact of our client’s site. These issues are not repeated here.

17. In relation to the Sustainability Appraisal our client maintains significant concerns with regards to the robustness of the exercise. Part 3A of the updated January 2018 Sustainability Appraisal (SD_018M) identifies seven alternative options relating to the spatial strategy (Table 2.2a). The options consider variations upon the housing requirement and whether the village of Thorpe is retained or released from the Green Belt. None of the options consider reasonable alternative distributions. For example, greater levels of development proposed within the local
centres of Virginia Water, Woodham/New Haw, Englefield Green and Ottershaw. This is considered a flawed approach.

18. Our concerns are not just limited to the broad distribution but also the assessment of individual sites. The inadequacy of the assessment is highlighted when comparing the Sustainability Appraisal of the Wey Manor Farm site undertaken by RPS CgMs Ltd, submitted alongside our client’s comments upon the Issues and Options / Preferred Options consultation in August 2016 and the Draft Plan in June 2018, and the Council’s assessment. Our client maintains that the scoring contained within Part 3A of the updated January 2018 Sustainability Appraisal (SD_018M) continues to be based upon inaccurate information. For example, Objective 3, ‘soils and mineral resources’ is scored a double negative. This is despite more recent evidence and agreement with Surrey County Council that the site’s potential for mineral excavation is very low.

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?**

19. No, I refer the Inspector to our other comments upon this issue.

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?**

20. No, a significant infrastructure constraint is the A320 and the major highway improvements required to mitigate the impacts of development along this corridor. Despite the corridor being identified as suffering from significant stress in 2016 (Transport Impact Assessment, SD_015A) the Council has sought to deliver nearly half of its proposed housing provision along this corridor. Highways England raised concerns regarding the adequacy of the evidence supporting the plan, requesting further information in July 2018. The A320 Topic Paper (SD_21B) identifies further modelling work was to be undertaken and a Statement of Common Ground would be agreed between the two parties. At the time of writing, neither are available on the examination website (para. 4.7 and 4.8). Our client wishes to reserve the right to provide appropriate comments once the relevant evidence is published. However, given the comments of Highways England it must currently be concluded that infrastructure need and constraints have not been adequately assessed.

21. In terms of scheme delivery, the Council is seeking to commence its first phase works of mitigation works on the A320 by quarter 3 of 2020/21 (figure 2, A320 Topic Paper, SD_21B). This requires the planning and design phase to commence quarter 3 of 2019/20. This is optimistic and is predicated on Housing Infrastructure Fund (HIF) monies being secured to forward fund delivery. Whilst it is understood that in May 2018 the Ministry of Housing
Communities and Local Government (‘MHCLG’) confirmed that the A320 bid has been shortlisted there is no guarantee the bid will be successful. Even if successful no announcement will be made until May 2019 at the earliest. Following that the Council will not only have to undertake appropriate planning and design but will also need to acquire 3rd party land. This is unlikely to be resolved within 12 months and as such will result in delays to delivery of the plan.

22. The costs of the A320 mitigation are considerable and maybe prohibitive to the rapid delivery from sites. The Council’s A320 Topic Paper (SD-21B) identifies the costs of the required mitigation along the whole corridor of around £42m, with Runnymede schemes required to contribute £33m of this total (para. 3.30). These are considered optimistic given that issues such as land ownership and highway boundary extents are still unknown and Environmental Assessments will be required. There is, therefore a strong possibility that the costs will spiral significantly.

23. The Council attempts to suggest that necessary mitigation on the A320 within Runnymede can be reduced to £20.6m (para. 5.4). At this stage this is pure speculation. Such reductions are reliant upon monitoring of existing schemes and further discussion with Highways England. The current evidence before the examination suggests the costs of mitigation within Runnymede will be at least £33m.

24. Funding for the A320 mitigation is suggested to be in the form of developer contributions. The Council estimate that developer contributions can fund approximately £22m towards highway improvements. This is significantly below the identified costs of £33m and only marginally above the Council’s optimistic reduction to £20.6m. Given the likelihood of additional costs associated with 3rd party land it is unlikely, even at the reduced costs, that the identified contributions will be sufficient to fund the mitigation required. Furthermore, other the developer contributions will also be required to fund other localised highway works. Whilst the Council suggest the A320 mitigation will be prioritise there will be an inevitable drain upon available funds. Whilst other possible sources of additional funding are noted it remains unclear if these would be available or the timescales required to access such funding. There is therefore a real danger that the required infrastructure will not be delivered in a timely fashion.

25. A total of 11 sites within Runnymede are reliant upon the infrastructure works required along the A320 corridor, with a combined capacity of 3,700 dwellings. The Council is reliant upon many of these sites to demonstrate it has a five-year supply of housing land upon adoption. This heavy reliance upon such sites places the deliverability of the plan at risk. This is further exacerbated by the fact that in addition, other significant developments are proposed by
Woking Borough Council on the A320 corridor, namely Fairoaks Airfield (circa 1,000 dwellings) and Martyrs Lane (circa 1,200 dwellings).

26. It is therefore strongly recommended that the Council provide additional sites which are not reliant upon the A320 corridor improvements and can deliver in the short-term. The Wey Manor Farm site could be fully delivered within the next five years. It does not require any significant mitigation measures and would be able to provide affordable housing.
Appendix 1

Context Plan and Concept Masterplan