Examination of the Runnymede 2030 Draft Local Plan

Examination Hearing Statement

on behalf of Tarmac Trading Limited

Matter 3: Overall Spatial Strategy

November 2018
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1 INTRODUCTION

1.1.1 This Hearing Statement has been prepared by Heaton Planning Limited (“HPL’’). This statement supports the representations made on behalf of Tarmac Trading Limited (“our Client”).

1.1.2 This statement follows from previous representations to the plan (ID representor 1937) and should be read in conjunction with the previous representations.

1.1.3 We have responded where appropriate to the questions highlighted within examination document ID/02. It is our intention to play an active role in the examination hearing sessions. This may include participation in some of the other questions for which answers have not been provided here although which still relate to matters raised within representations previously made. This is consistent with the published guidance.
2  MATTER 3 – OVERALL SPATIAL STRATEGY

Question 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, enhancing the environment sound?

2.1.1 No, the overall framework does not provide for land allocations which meet acknowledged spatial objectives within the plan, particularly the role of Thorpe Industrial Estate to provide for further growth.

2.1.2 As noted above and also within our previous representations, the draft plan specifically acknowledges the role of Thorpe Industrial Estate to provide for further growth. However, it does little to recognise either its strategic importance or spatial benefits through a land allocation.

2.1.3 Thorpe Industrial Estate is identified within Draft Policy IE2 as a “Strategic Employment Area” (SEA). It is one of five designated employment areas that together “make up the borough’s current core supply of employment land”.

2.1.4 In particular the draft plan notes that Thorpe Industrial Estate “provides the majority of industrial space within the Borough, which is considered to be of strategic importance to the local economy”.

2.1.5 The draft plan also acknowledges additional employment floorspace will be provided within the SEA during the plan period. In line with our representations to Matter 2, we submit that further land will need to be identified to meet needs.

2.1.6 However, the Employment Land Review (ELR 2016) identifies potential difficulties associated with providing further growth within the SEA at Thorpe Industrial Estate. For example, paragraph 3.68 of the ELR identifies “threats and weaknesses” arising from “fragmented land ownership, making it difficult to progress large scale comprehensive redevelopments”.

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2.1.7 Our client’s site provides the opportunity for large scale comprehensive development, which includes extensive landscaping with potential for public access. The site is located in a small gap between the defined “urban area”, it does little to satisfy the five purposes of including land within the Green Belt.

2.1.8 Despite the ELR acknowledging the presence of planning permission (granted 2015) for the redevelopment of a small part of the SEA (the Three Stars Industrial Estate) it still identifies there to be “limited scope for intensification possible through redevelopment/intensification of employment uses” (HPL emphasis).

2.1.9 Clearly, whilst the Council acknowledges the importance of Thorpe Industrial Estate and a desire to direct “further growth”, the evidence base identifies barriers to the delivery of this growth.

2.1.10 We therefore question whether the true spatial aspirations of the Draft Local plan (and therefore the soundness of policy IE2) can be delivered in this location without making provision for the expansion of the SEA which includes our client’s land.
Question 3.1 b) Is it based on robust evidence, consistent with national planning policy and is it deliverable?

2.1.11 The overall spatial strategy is not based on robust or credible assessments, particularly with regard to the published Site Selection Methodology and Assessment (SSMA – December 2017).

2.1.12 We acknowledge the detailed site specific implications will be assessed within the envisaged stage 2 hearings. However, we consider that there are numerous weaknesses in both the methodology and assessment, and that as a result, the findings are not robust or credible.

2.1.13 More specifically, the site has been excluded for arbitrary factors rather than as a result of balanced and sound planning judgement where some qualitative assessment would have improved the overall assessment outcome.

2.1.14 The methodology discusses how sites that performed “low” or “low-medium” at stage 3 “where mitigation could not overcome impacts, or sequentially preferable sites were available, were not considered (...) and not taken forward to stage 4”.

2.1.15 However, it is already identified that insufficient sites within Runnymede will come forward to meet development needs over the plan period.

2.1.16 We submit that a combination of this shortfall of sites and a failure to either re-assess “sieved out” options or re-cast assessment criteria renders the overall findings of the site selection (and therefore the spatial approach of the plan) unsound.

2.1.17 There is no further specific analysis or professional judgement provided to explain the rationale behind the exclusion of our Client’s site. It is simply removed from the site selection after stage 3 which describes the site as having “low” accessibility in terms of distances to bus and rail connections, as well as a health centre and convenience retail. Consequently, the site scores “low” overall in the assessment of accessibility.

2.1.18 The “comments” provided at this stage merely describe how the site performs “low” in these areas. There is no discussion of the wider merits of this site, such as its proximity to an SEA or the potential ability to overcome identified
issues through the benefits associated with development. This may include extending the identified “shuttle bus service” (as identified within the ELR), travel planning or other commonly used incentivised measures. This would present a much more balanced, rounded and therefore robust conclusion which is reflective of the Framework.

2.1.19 The published Site Selection Methodology also refers to work undertaken by other Local Planning Authorities and highlights how the Council has informed its own assessments based on the work of others. However, we would suggest that the extent to which the work has been informed by others is highly selective and leads to significant inadequacies.

2.1.20 For comparison, the work of Selby District Council is cited by Runnymede as a useful example. However, the work of Selby District, includes a qualitative approach absent from the Runnymede assessment.

2.1.21 Selby, in their methodology, describe how a “flexible approach has facilitated the allocation of some sites that can offer wider or site-specific benefits in preference to more accessible sites”.

2.1.22 This is particularly relevant to our client’s site which has been discounted for much needed employment use (when there is a stated shortfall in the plan period) due to the incorrect exclusion of the site due to some elements of accessibility being rated as ‘low’.

2.1.23 It is therefore recommended that the site selection process take a more balanced and qualitative approach on the basis of planning judgement when it comes to disqualifying sites, similar to the aforementioned local authorities.

2.1.24 We anticipate that this issue will be revisited during the envisaged ‘stage 2’ hearings.
Question 3.1 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?

2.1.25 As noted in our response to Matter 1, we do not consider that the approach to analysing, understanding and mitigating potential impacts as outlined within question 3.1c is adequate.

2.1.26 As noted in our wider representations we do not consider the Sustainability Appraisal (SA) to be adequate. Whilst the detailed merits of our client’s landholding will be considered at later stages of the examination process, it is worrying that the approach to non-absolute constraints is inaccurate and is not reflective of the characteristics of our site.