RUNNYMEDE 2030 LP EXAMINATION

MATTER 3: OVERALL SPATIAL STRATEGY

STATEMENT ON BEHALF OF ST EDWARD
(REPRESENTOR ID: 1498)
CONTENTS:

1. INTRODUCTION 1
2. MATTER 3 2
1. **Introduction**

1.1 This Statement is submitted on behalf of St Edward, and follows representations made on their behalf throughout the emerging Local Plan process.

1.2 St Edward are a joint venture company owned by the Prudential Assurance Company and Berkeley and have an interest in an omission site at North East Ottershaw (referred to as Site 46 in the SLAA). Representations have been made previously setting out the merits of the site, but this Statement focusses only upon the specific questions asked by the Inspector.
2. **Matter 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?

2.1 The overall answer to this question is No. The reason behind this is best explained by the response below to some of the associated questions asked by the Inspector;

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?*

2.2 This can be best assessed through consideration of such objectives, as set out at paragraph 5.7 of the submission Local Plan. They cover the issues of ‘supporting local people’, ‘enhancing our environment’ and ‘improving our economy’.

2.3 With regards to the first of these objectives, consistent reference is made to the requirement to enhance the health and well-being of the community, improve local leisure facilities that are accessible to all, and enhance infrastructure and facilities for existing communities. Unfortunately, the Local Plan, as proposed, fails to achieve such objectives.

2.4 The Council recognise they have a shortage in Outdoor Sport Space, yet the opportunity has not been taken to address this when identifying allocations. Of the many residential allocations, only Longcross Garden Village requires the provision of playing pitches, meaning the majority of the Borough’s residents will remain without sufficient pitches / leisure facilities, in direct conflict with one of the Local Plan objectives.

2.5 Turning to the objective of ‘enhancing our environment’, this includes increasing resilience to flood risk. However, the allocations as proposed include a number of allocations in Flood Zones 2 and 3, where the flood risk is not known, and as recognised within the Stage 2 Sequential Test’s undertaken, have not yet been subject to the EA’s Thames Area Climate Change Allowance. Such allocations therefore do not increase the resilience to flood risk, but potentially increase the likelihood of it.
2.6 The environment objective also includes the requirement to protect and enhance the Borough’s biodiversity, habitats and species. For reasons set out within this and other submissions, the Council are failing to protect one of the most important habitats and protected species within it, which are found at the SPAs. The decision by the Council not to identify sufficient SANG provision to mitigate the impact upon the SPAs within the Local Plan, in order to allow for their housing need, will either harm the important habitats and species, or mean that housing cannot be delivered as required, and hence conflict with another underpinning objective of the Local Plan. The opportunity for net gains in biodiversity, as set out clearly as an objective of the Local Plan, and as could be achieved through the introduction of sufficient SANGs, has also been missed by the decision not to identify such SANGs over the Plan period in the Local Plan.

2.7 With regards to the objective of improving the economy, reference is understandably made to the support of projects which reduce traffic congestion and enhance accessibility. In connection with this, significant background work has been undertaken in assessing how improvements can be made to the A320 to resolve current and future congestion. Unfortunately, the Council have ignored opportunities to incorporate such improvements when making allocations, as illustrated by the non-inclusion of SLAA site 46 at NE Ottershaw, which will enable recommended improvements to the operation of Jcn 10, as confirmed in the A320 Corridor Study. The potential improvements, if including Site 46, could also accommodate a re-sited car park to serve the local centre, given that the current one will be lost to allow for the recommended junction improvements.

2.8 It is therefore considered that the apportionment of housing and other development is not consistent with the Plan’s objectives and that allocations should be amended accordingly to address this.

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

2.9 Submissions in response to Matter 2 have explained why the Council’s chosen housing requirements, which inevitably impact upon the overall framework of the Plan, are not based upon robust evidence.

2.10 With regards deliverability, the approach taken by the Council creates major concerns. The decision not to identify sufficient SANG provision for the Plan
period raises major doubt as to whether the Council’s chosen housing requirements can be met. Separate submissions explain why such requirements should be higher than the Council are proposing. However, even if the housing requirements remain as proposed in the Local Plan, there is major doubt as to whether they can be delivered in the Plan period.

2.11 Allocations SL2 - 6, SL9, SL10, and SL14 - 18 all require mitigation through SANG solutions that are not currently identified. This equates to over 2,200 allocated dwellings that might not come forward, due to SPA mitigation not being identified within the Plan period.

2.12 This concern was highlighted in the 2017 HRA, which at 8.24 specifically recommends that due to the risk to housing delivery later in the Plan period, the potential for further bespoke or strategic SANG should be explored in time for the Examination in Public. This comment followed that provided by Natural England in 2016, reproduced at paragraph 8.26 of the same document, which stated;

‘The approach we would recommend is that in time for the examination of this Local Plan, Runnymede should be in a position to outline where SANG will be delivered in the Borough to avoid and mitigate the effects of the entire housing allocation (within 5km of the SPA).’

2.13 The Council have failed to do so, which inevitably raises concerns about deliverability as has been raised consistently on the matter in recent years by different bodies, as explained above.

2.14 Similar concerns relate to allocated sites containing Flood Zones 2 and 3, plus those within close proximity of major noise sources where no Noise Assessments have been undertaken. Once further work is undertaken it is entirely feasible that flood or noise constraints will mean that the potential of those sites to deliver the assumed number of dwellings is considerably diminished.

2.15 As recognised within the SA Addendum (May 18), there are considerable unknowns in connection with the A320 and associated congestion. Table 3.1 of the document recognises that it is not yet known whether allocations SL12 – 18 will have negative effects. Once the A320 Study is complete, it may become apparent that such allocations, or at least some of them, would have a sufficiently negative impact upon congestion associated with the A320, that the allocation is not justified.
2.16 The fact that these allocations are acknowledged within the Local Plan itself as being contingent upon delivery of mitigation to the A320, when it is not even known what such mitigation is required, and whether it can be achieved, highlights the major question mark that results in terms of deliverability from these sites.

2.17 There are omission sites, such as SLAA Site 46 (Land at NE Ottershaw), which include land that can assist with the recommended A320 mitigation works relating to Junction 10. The non-inclusion of such sites questions the deliverability of allocations in the vicinity.

2.18 The A320 Study identifies that at some key junctions on the network the predicted traffic volumes that are to be accommodated over the Plan period require a significant expansion of the junction footprint in order for the works to be effective. Junction 10 is such a case, and the Study has recommended that at the next stage of the design process, further investigation of the highway boundary location is undertaken to gain more certainty on the extent of third party land requirements to deliver the proposed mitigation measures, initially focussing on those suggested schemes in the vicinity of St Peter’s Hospital, such as Junction 10.

2.19 This highlights that without agreement on third party land, such as that within SLAA Site 46, effective mitigation is unlikely to be achieved, which in turn questions the deliverability of allocations SL12 – 18 in the currently proposed Local Plan. The appropriate allocation of additional/alternative sites would enable recognised important road improvement works to be undertaken, and in the case of land at SLAA Site 46 would enable the delivery of land to unlock the A320 junction 10 improvements, in addition to the other benefits that such an allocation would bring.

2.20 Questions about deliverability are also apparent from the Council’s own wording within some of the allocations. As an example, Policy SL6 acknowledges that it is still not known whether part of the site, which could deliver approximately 100 of the new homes, will actually be available. As a matter of principle, the Plan should not include allocations where there is such a degree of doubt over the subsequent delivery on site. Such enhanced clarity would be consistent with recent Government announcements under the ‘Definition of Deliverable’ within
the MHCLG Technical Consultation Document on updates to national policy and guidance, released in Oct 18.

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

2.21 For the reasons explained above, the overall framework, which results in allocations being made in Flood Zones 2 and 3, and noise sensitive locations, indicates that proper account has not been taken of the constraints present. Until the EA’s Thames Area Climate Change Allowance has been undertaken, the potential for flood at sites SL6, SL7, SL14 and IE10, must be treated with a considerable degree of caution, and associated deliverability questioned. Whilst Level 2 SFRAs have been undertaken for the sites referred to, the commentary in connection with ‘Sources of Flooding’ acknowledges that modelling for the revised climate change is not available, and the weight afforded to such Assessments needs to be limited accordingly. Such caution is considered particularly relevant in Runnymede, given the 2014 floods which had such a major impact on the Borough.

2.22 With regards mitigation, the framework does not allow for sufficient mitigation in connection with the SPA in terms of SANG provision. It adopts an approach that requires housing delivery to effectively stop if the necessary additional, currently unidentified, SANG provision does not emerge during the Plan period. As flagged up by Natural England in 2016, it is necessary for the Local Plan to identify SANG provision for the entire housing allocations over the Plan period. The fact the Local Plan has not done so, demonstrates that proper consideration has not been given to necessary mitigation in this respect.

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?

2.23 Cross reference to the Council’s Infrastructure Delivery Plan (Dec 17) is considered helpful when assessing such matters.
2.24 On the issue of Outdoor Sports Provision, the IDP notes at 4.64 that there is currently a deficiency of outdoor sports provision across the majority of Runnymede. Paragraph 4.65 goes on to note that there are no known plans to provide new outdoor leisure facilities in the Borough.

2.25 The application of benchmarks for the recommended provision of outdoor sports provision, alongside the Plans expected population growth scenario (option SS5) results in a requirement for an additional 19.9 hectares of outdoor sports provision over the Plan period to 2030 (Table 41). It is worth noting that separate representations make the case that the Plan period should be longer, and that the population growth scenario should be higher than that proposed by the Council in the Plan. As a result, the suggested 20 hectare provision is the minimal amount likely to be necessary to accommodate for outdoor sports provision over the Plan period, and it could be notably higher. It should also be noted that this is coming from a base of a current under provision across the Borough.

2.26 In response to the question and given that there are no plans for additional provision despite the significant requirement, there can be no confidence that the Council’s strategic needs in this respect will be met. In order to address this, alternative/additional allocations should be made that can provide for the Council’s need for Outdoor Sports Provision over the Plan period.

2.27 With regards ‘Play Space’ the IDP notes that at present there is a considerable deficiency of play facilities across the majority of Runnymede. It calculates that even when allowing for the planned projects to increase Play Space through the Plan period, there will be an outstanding net demand for 9.1 hectares of such space, assuming the SS5 strategy is followed. Once again it is therefore apparent that there can be no confidence that such strategic needs will be met through the Local Plan as proposed. Alternative / additional allocations should be identified that can contribute to addressing the recognised shortage of Play Space provision.

2.28 With regards Education provision, the IDP identifies that there will be a net requirement of 7 – 9 new early years facilities in the Borough, 6 – 8 new Primary Forms of Entry and 6 new Secondary Forms of Entry. For clarification, the net requirement allows for the proposed Early Years and Primary provision at Longcross Garden Village. No other additional educational provision is identified
in the Plan period, leading to the conclusion that there cannot be confidence that educational needs will be met over the Plan period.

2.29 Similarly, the IDP confirms that there will be notable additional requirements for Health provision that are not planned for, and hence there cannot be confidence they will be provided in the Plan period.

2.30 With regards SANG provision, representations have been made elsewhere highlighting the fact that the Council have chosen not to identify sufficient SANG provision for the Plan period, and the problems associated with this. The IDP confirms as much when it calculates at 4.7.10 that allowing for the planned SANG provision at Chertsey Meads and the Longcross Garden Village, a deficit in provision of 85.5 hectares will be present (assuming the SS5 strategy and Plan period to 2030). The deficit is highlighted as critical within the IDP, yet the Local Plan does not respond to it. It is therefore inevitable that there can be absolutely no confidence that the Council’s strategic requirements in this respect will be met through the current Local Plan. In order to address this, allocations should be identified within the Plan that can contribute towards full SANG provision over the Plan period.

2.31 Finally, consideration needs to be given to the A320 Study, and congestion associated with this highway. It is recognised that the Council have commenced consideration of this very relevant infrastructure constraint. However, the work undertaken to date has highlighted that the concerns are significant and are not straightforward to overcome. The only conclusions that can be drawn to date in connection with some of the allocations (SL12 – 18) is that the impact of such allocations may be negative. There is no agreement on what mitigation works would be needed, and what works can feasibly be undertaken, in order to address these congestion issues. Considerable land ownership and funding questions remain unanswered. It therefore follows that there can be no confidence at present from the current Local Plan that this constraint will be addressed in a timely manner.

2.32 The inclusion of allocations that will enable necessary works to be undertaken, to address such congestion concerns, should be a priority to ensure this particular constraint can be overcome. As explained at 2.17 – 2.19 above, the inclusion of SLAA site 46 at NE Ottershaw would offer the opportunity to undertake the necessary and recommended mitigation works for jcn 10 of the A320.