Examination of the Runnymede 2030 Local Plan

Stage 1 Hearings – November 2018

Representations on behalf of Goldcrest Land – Representor No. 1960

The Inspector has raised four main issues in connection with the opening hearings sessions, each with a number of related questions, in connection with these examination hearings. Where relevant we address each of these as supplementary evidence to that submitted at the Submission stage of the draft plan.

Matter 3: Overall Spatial Strategy

At para 3.1 the Inspector asks:

"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:

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

In our original objections and also in those objections by others on the deliverability of housing sites, not only has this been queried over the next five years has been questioned and also over the full plan period. This is that given a number of the sites are greenfield and require a greater time period to deliver in the absence of site infrastructure or due to constraints with existing infrastructure such as the A320. The evidence that has been submitted fails to give confidence that its is robust. Examples are the unsubstituted original housing number and changes made to many of the strategic housing sites both in their housing capacity and also the timeframe for delivery.

At para 3.1 the Inspector asks:

"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:
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?

The draft plan does not take proper account of the natural constraints associated with some sites. It is not necessary to release some of the proposed greenfield Green Belt sites with the consequential impacts that would require mitigation, when there are brownfield Green Belt sites that can accommodate housing, including affordable housing, with far less mitigation.


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?

It is not considered that these constraints have been adequately considered, assessed and accordingly there is a lack of confidence that these can be addressed such as to make a difference. Two of the largest of these is the works necessary to the A320 and also the impact on Junction 11 of the M25.

The Council recently resolved in October 2018, on representation of the application to its Planning Committee, to resolve to grant planning permission for development at St Peters Hospital. This is however still very much subject to referral to the SoS as a departure from the development plan.

However, this position was only reached after Highways England has removed its objection as to the impact on Junction 11 of the M25 as a result of enhanced shuttle services servicing the hospital to offset the increase in residential movements. This is however likely to be a unique solution related to the hospital site and not applicable to other housing sites reliant on this junction.

Further in respect of the A320, draft Policy SD3 indicates that over 1000 housing units in the plan are depend upon the delivery of mitigation works to the A320. Funding is not yet in place for all these works and confirmation as to whether some of the funding will be available may not be known before May 2019 (A320 Topic Paper – July 2018).

Reliance upon these sites therefore creates delivery uncertainty over the plan period.