Runnymede 2030 Local Plan
Public Examination
Stage 1

Response to Inspector’s Matters and Questions for Stage 1 Hearings
On behalf of Crest Nicholson
(ID: 1990)

Matter 3
Overall Spatial Strategy

November 2018
Runnymede 2030 Local Plan
Response to Inspector’s Matters and Questions for Stage 1 Hearings

Matter 3
Overall Spatial Strategy
Barton Willmore LLP on behalf of Crest Nicholson

<table>
<thead>
<tr>
<th>Project Ref:</th>
<th>24209/P5/A5</th>
<th>24209/P5a/A5</th>
<th>24209/P5b/A5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Status:</td>
<td>Draft</td>
<td>Draft</td>
<td>Final</td>
</tr>
<tr>
<td>Issue/Rev:</td>
<td>-</td>
<td>a</td>
<td>b</td>
</tr>
<tr>
<td>Date:</td>
<td>30th October 2018</td>
<td>2nd November 2018</td>
<td>5th November 2018</td>
</tr>
<tr>
<td>Prepared by:</td>
<td>Katherine Jones/Emily Ford</td>
<td>Katherine Jones</td>
<td>Katherine Jones</td>
</tr>
<tr>
<td>Checked by:</td>
<td>Michael Knott</td>
<td>Michael Knott</td>
<td>Michael Knott</td>
</tr>
</tbody>
</table>

Barton Willmore
The Blade
Abbey Square
Reading
Berkshire.  RG1 3BE

Tel:  0118 943 0000  Ref:  24209/P5b/A5/KJ/slh
Fax:  0118 943 0001  Date:  5th November 2018
Email:  planning@bartonwillmore.co.uk

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.
**INTRODUCTION**

1.1 Barton Willmore LLP is instructed by Crest Nicholson (CN) and Commercial Union, General Accident and Norwich Union (CGNU) to submit this written Hearing Statement in response to the Inspector’s Matters and Questions for Stage 1 of the Runnymede 2030 Local Plan Examination. These representations expand upon the representations submitted on behalf of CN and CGNU in response to the consultations for Regulation 19 Parts 1 and 2.

1.2 CN and CGNU control the former DERA site at Longcross, Surrey, which is proposed for allocation and removal from the Green Belt in the Runnymede 2030 Local Plan under Policy SD10 (Longcross Garden Village). The site was designated by the DCLG (now Ministry of Housing, Communities and Local Government) as a Locally Led Garden Village (LLGV) in January 2017. Part of the north of the site to the north of M3 Motorway (the western edge, now referred to as ‘Longcross Park’) is designated as part of the EZ^3 Enterprise Zone.
RESPONSE TO 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?*

3.1.1 Paragraph 5.6 of the Plan sets out the spatial vision for the Borough. The spatial vision states that:

   ‘By 2030 Runnymede will be a Borough which has effectively balanced its competing environment, social and economic pressures by delivering sustainable growth.’

3.1.2 The vision seeks, *inter alia*, to protect the general extent of the Green Belt whilst making the most efficient use of land, creating inclusive places, and delivering a range of housing and the infrastructure necessary to support sustainable communities.

3.1.2 The Plan includes 14 objectives related to the following three key areas which identify how the spatial vision will be realised. These include:

   - **Supporting local people**: including the delivery of at least 7480 homes in the Borough between 2015 and 2030 (498 dpa) including affordable housing, starter homes and housing for those with specialist needs.

   - **Enhancing our environment**: including protecting and enhancing the Borough’s most valued landscapes and green spaces, and revitalising areas in need of physical improvement.

   - **Improving our economy**: including sustaining economic growth and supporting the development of the Enterprise Zone at Longcross Park and improving accessibility to a range of sustainable and active travel choices.

3.1.3 In our view, the broad apportionment of housing, economic and other development is consistent with the Plan’s spatial vision and objectives. We support the Council’s decision, as outlined in paragraph 19 of The Overview Topic Paper (SD_021A), to direct most new housing to the three main towns of Addlestone, Chertsey and Egham as well as the
Longcross Garden Village. This is entirely consistent with the vision and objectives of the Plan given that these locations benefit or will benefit from the greatest concentrations of services and facilities and high levels of accessibility (CD_001; paragraphs 5.31-32).

3.1.4 Specifically, Objective 5 relates to the delivery of the Longcross Garden Village. Objective 12 refers to Longcross Park, the Borough’s Enterprise Zone. The allocation of Longcross Garden Village under Policy SD10 for a significant contribution to the Borough’s development needs is, therefore, consistent with the overall spatial vision. The site’s allocation will enable the objectives of the Plan to be met through the delivery of a sustainable, mixed use community which delivers housing and employment opportunities and a range of services and facilities. The specific reference to Longcross within the Plan’s objectives affirms the strategic importance of the site to the Plan’s strategy, including in relation to the delivery of a minimum of 1,700 new homes and new employment development, as we will address in detail through the Stage 2 Examination hearings.

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

Robust Evidence

3.1.5 In our opinion, the Plan’s strategy, as well as its policies and site allocations, is largely based on a comprehensive and up to date evidence base. However, as we have set out in our representations to the Regulation 19 Parts 1 and 2 consultations, we have concerns with some elements of the evidence base.

3.1.6 Notwithstanding this, we consider that, broadly, the plan is justified, taking into account paragraph 182 of the NPPF (2012) which requires plans to be based on proportionate evidence.

3.1.7 As set out in response to Matters 1 and 4 we consider that the evidence base, and the Plan itself, is the product of the Council’s ongoing collaboration with neighbouring authorities through the Duty to Cooperate process (as detailed in SD_016). For example, the A320 study in itself arose from the Council’s Duty to Cooperate process which highlighted the need to ensure the cumulative impact of development in Runnymede, Surrey Heath and Woking Borough Council would not have an unacceptable impact on the A320 corridor.
**Consistent with National Planning Policy**

3.1.8 Paragraph 83 of the NPPF (2012) states that:

‘**Once established, Green Belt boundaries should only be altered in exceptional circumstances**’

3.1.9 Exceptional circumstances justifying the amendment of the Green Belt boundary are detailed by the Council in the Exceptional Circumstances report (SD_004X and SD_004Y). We support the conclusion set out in paragraph 1.25 that Green Belt release is justified on the basis that the Borough is heavily constrained, there is a need for housing which cannot be accommodated by other nearby local authorities, and there is a need to ensure that the Green Belt boundary is defensible and logical.

3.1.10 Paragraph 84 states:

‘**When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.**’

3.1.11 Paragraph 52 of the NPPF (2012) outlines that:

‘**The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.**’

3.1.12 We support the allocation of the Longcross Garden Village on the basis that it is entirely consistent with paragraph 52 of the NPPF. As set out above, Longcross Garden Village will deliver a significant proportion of the Borough’s development needs, including a minimum of 1,700 new homes in addition to employment, infrastructure and local services. The allocation of the site is, therefore, also consistent with paragraph 84 as it promotes a sustainable pattern of development.

**Deliverable**

3.1.13 Paragraph 182 of the NPPF states that in order to be effective:

‘**the plan should be deliverable over its period.**’
3.1.14 We broadly agree that the plan’s overall framework is deliverable. For example, the allocation of Longcross Garden Village makes a significant contribution to delivering the Local Plan framework for meeting development needs: the requirement for a minimum of 1,700 dwellings equates to almost a quarter of the total housing requirement in the Local Plan (23%).

3.1.15 However, as we have set out in representations made at the Regulation 19 stage, the Borough is not proposing to meet its OAN in full through the Local Plan. The Strategic Housing Market Assessment (SHMA) Update 2018 concluded an overall reduction in the Borough’s OAN and the reduction in the plan period from 2035 to 2030 sought to ensure that the OAN could be met.

3.1.16 Whilst this is largely possible, the provision of 494 dpa proposed in the Local Plan is less than the 498 dpa SHMA OAN for Runnymede and will therefore result in a shortfall of housing delivery over the Plan period.

3.1.17 Therefore, whilst the Plan’s strategy is largely deliverable, there is potential that additional sites may be required to order to meet the Borough’s full OAN. We do not consider that this factor is fundamental to the soundness of the Plan as the shortfall is very small in the context of the quantum of housing which will be delivered over the plan period compared to overall housing need. In addition, there remains a realistic prospect that the Plan’s strategy will be delivered in full as additional capacity could be identified on allocated sites and/or the quantum of dwellings delivered on windfall sites may exceed that anticipated.

3.1.18 In summary, in our view, this factor is not fundamental to the overall soundness of the Plan with the Plan’s strategy having a realistic prospect of being delivered.

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?

3.1.19 As set out in our response to Matter 1, we consider that the Plan is supported by an adequate Sustainability Appraisal (SA). The potential effects of the Plan’s spatial strategy are considered within Part 3B of the SA report, including in relation to the natural environment, landscape, flood risk and air quality (SD_018N; pages 2 and 19-23). We support the approach taken to identifying potential impacts and consider that appropriate mitigation has been identified where necessary.
3.1.20 On the basis of the above and the information set out by the Council in the Overview Topic Paper (SD_021A; paragraphs 20-25), we consider that the Plan has been informed by appropriate evidence in the form of the SA, as well as Habitats Regulation Assessment (HRA). The Plan, therefore, takes proper account of potential impacts on matters including the natural environment, landscape, flood risk, and air quality and provides for mitigation where necessary.

\[d) \text{ Have the strategic infrastructure constraints and needs been adequately assessed and is there reasonable confidence that they will be addressed in a timely manner?}\]

3.1.21 The Plan identifies a number of existing infrastructure issues, including:

- Congestion on a key transport route through the Borough, the A320, and a number of other ‘congestion hotspots’ including the M25 and A317;
- Infrequent and limited bus services during peak hours and limited connectivity by walking/cycling routes in some areas;
- Level crossing barrier down times in the Addlestone and Egham areas in particular causing significant delays and queuing on the surrounding highway network; and
- Local GP services exceeding recommended patient list sizes in several locations.’ (CD_001; paragraph 5.44)

3.1.22 We support the Council’s recognition in paragraph 5.45 that growth can bring opportunities to address existing problems, such as those set out above, and enhance existing facilities and assets.

3.1.23 The evidence base, including the Surrey Infrastructure Study (SD_007A-J), the Infrastructure Needs Assessment (INA) (SD_007K-L) and the Infrastructure Delivery Plan (IDP) (SD_007M-O), assesses the strategic infrastructure needs and identifies how new and improved infrastructure will be delivered.

3.1.24 Given that the IDP establishes that the delivery of the strategic infrastructure and improvement of existing issues is largely dependent on the delivery of the site allocations in the Local Plan, in our view, it is essential that the Plan is progressed to adoption in a timely manner so that development, and work to improve infrastructure provision, can progress. We address this further in our Matter 1 statement.

3.1.25 As an example of how development will enable infrastructure improvements, the allocation of Longcross Garden Village requires \textit{inter alia} the delivery of on and off site
improvements to the local road network to mitigate significant impacts as set out in the IDP and contributions towards improvements to the A320. Contributions towards infrastructure mitigation have been secured through the S106 for Longcross North (planning permission RU.13/0856). As part of the pre-application process for Longcross South, work is ongoing to agree the contributions and delivery of on and offsite infrastructure provision and mitigation.

3.1.26 On this basis, we consider that there can be reasonable confidence that infrastructure needs have been identified and that appropriate solutions will be sought and, ultimately, delivered.

3.1.27 We agree that the Council should continue to seek opportunities to deliver strategic and local schemes which improve and enhance the quality and capacity of transport and other infrastructure within Runnymede and the wider area (as outlined by the Council in paragraph 5.46 of the Plan). On this basis, we support the Council’s commitment to reviewing and updating the IDP on a regular basis to ensure it remains up to the date with the timing of projects, their costs and funding (Policy SD6).