RESPONSE TO MATTER 3

REPRESENTOR ID 1998

HEARING STATEMENT
ON BEHALF OF WENTWORTH RESIDENTS ASSOCIATION

RUNNYMEDE 2030
LOCAL PLAN EXAMINATION:
STAGE 1 HEARINGS

NOVEMBER 2018
Title: Hearing Statement Matter 3
Project: Runnymede 2030 Local Plan Examination
Client: Wentworth Residents Association
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Introduction

1) This Hearing Statement has been produced by ShrimplinBrown on behalf of the Wentworth Residents Association ("WRA") (representor ID 1998) in relation to the examination into the Runnymede Borough Local Plan 2030 ("the draft Local Plan"). It responds to Matter 3 of the Stage 1 Hearing Sessions.

2) As made clear in previous objections to the Local Plan, the WRA wishes to participate at the hearing sessions where this Matter will be considered by the Inspector.

3) The WRA represents the residents living on the Wentworth Estate (being over 1,000 households) and business interests in Virginia Water in all matters affecting the Estate.

4) The WRA objects to the draft Local Plan, specifically: the failure by the Council properly to discharge its duty to co-operate; the failure by the Council properly to undertake a sustainability appraisal (and related processes) into the draft Local Plan; and three proposed housing allocations:

   - Policy SD20: Longcross Garden Village;
   - Policy SL9: Housing Allocation at Virginia Water North; and
   - Policy SL10: Housing Allocation at Virginia Water South.
Matter 3: Overall Spatial Strategy (Policy SD2, Paragraphs 5.8-5.13, 5.19-5.21, 5.28-5.36)

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?

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

5) Policy SD2: Spatial Development Strategy asserts that:

“growth aspirations will largely be directed towards the most sustainable, larger settlements in Runnymede and towards the garden village at Longcross. These are considered to be the best locations for delivering supporting infrastructure as well as active and sustainable travel choices.”

6) However, in reality the allocation of sites is being entirely driven by the evidence gathering exercise. The assessment of individual sites has dictated the strategy for the District, rather than sites being assessed within the context of a considered and objective spatial strategy. This process of retro-fitting allocations is contrary to the principles of good planning as encapsulated in the NPPF.

7) The Local Plan: Issues, Options and Preferred Approaches consultation document (July 2016), set out seven different options (Table 4.2) before alighting on the preferred option (SS3). The subsequent Additional Sites and Options consultation (May 2017) followed the same process before alighting on an amended preferred option (SS5).

8) However, in neither document was there any proper testing or rigorous assessment
of the different options before the preferred option was alighted upon. Moreover, the seven different options were largely the same and did not fully consider the options available to deliver a strategy for sustainable development across the Borough having regard to (amongst other things) constraints, opportunities and the scope for working proactively with the Council’s neighbours. Nor was the opportunity to make best use of brownfield/previously developed land nor the potential to maximise densities on sites properly considered (see Hearing Statement regarding Matter 4).

9) Rather, each option involved delivering development within the Borough’s existing urban areas and on previously developed sites in the Green Belt with a view to implementing the findings of The Green Belt Boundary Technical Review (March 2016). In fact, the only variables were whether the village of Thorpe is returned to the Green Belt and how many Green Belt sites are released, largely based on the findings of the Green Belt Review.

10) The different options were therefore exclusively driven by the site selection process and, in particular, the Green Belt Review rather than an objective and spatial assessment of alternative strategic approaches.

11) This complete absence of a strategic approach is borne out by the fact that the locations listed in draft Policy SD2 and the sites proposed to be allocated under draft Policies SL2-SL18 are not the product of an holistic and thorough development strategy but are simply the result of site specific assessments. They are taken directly from the Site Selection: Methodology and Assessment (December 2017) which is a site specific assessment.

12) The Site Selection: Methodology and Assessment undertakes an eight stage assessment of sites, as explained below. This makes clear that the assessment is site specific and is not based on a wider strategy, which has proper regard to the comparative sustainability credentials of reasonable alternative spatial locations to accommodate new development both within and outside the Council’s borough:
• “Stage 1: An initial sift of sites1; 

• Stage 2: Undertake Sustainability Appraisal/SEA of all sites carried forward from Stage 1 as an independent assessment; 

• Stage 3: Assessment of accessibility2 and compare sites against significant non-absolute constraints as identified in the Green Belt Reviews3; 

• Stage 4: Compare sites against non-significant and non-absolute constraints identified in the Green Belt Reviews4; 

• Stage 5: Assess sites taken forward from stages 1, 3 & 4 with findings of the Green Belt Reviews5; 

• Stage 6: Consider the performance of sites in this assessment and the Sustainability Appraisal6 and recommend sites for allocation; 

1 Based on proximity to settlement; flood risk; Sites of International, National and Local Importance; Ancient Woodland; Heritage Assets; Site Access; Site Size. 

2 Based upon Journey Time to/from Major Centres or Centres of Employment in peak hours; Distance to Bus Stop with Very Good or Good level of service; Distance to Rail Station with Very Good or Good level of service; Accessibility by Cycling; Distance to Primary School; Distance to Secondary School; Distance to Health Centre or GP Surgery; Distance to Local Convenience Retail.  

3 Based on Flood Risk; Minerals/Waste Safeguarding; SNCI/LNR or Ancient Woodland; Agricultural Land Classification; Heritage Assets; Open Space; Topography.  

4 Are there non-designated biodiversity areas on site?; Are there Tree Preservation Orders/Protected Vegetation on site?; Is the site within a landscape character area?; Is the site compatible with neighbouring uses? Would it be affected by noise/odour?; Is the site within an Air Quality Management Area?; Is the site within a Groundwater Source Protection Zone?; Does the site have a history of land contamination?; Are there Underground or Overground utility pipes/cables on site?; Does a Public Right of Way cross the site?  

5 The brief for which was to “Appraise the whole of the Green Belt against the five nationally defined purposes of the Green Belt as set out in the National Planning Policy Framework; identify broad areas, which could potentially be removed from the Green Belt to provide locations for residential or employment use, including sites for Gypsies, Travellers and Travelling Showpeople; grade potential sites as to their suitability for development and recommend the most sustainable area(s) that could be allocated to deliver future residential or employment growth; and provide recommendations about where a defensible Green Belt boundary should be drawn.” (Green Belt Review, December 2014, paragraph 1.1.2).  

6 To conserve and enhance biodiversity, habitats and species; To protect and improve the health and well-being of the population and reduce inequalities in health; To protect soil and minerals resources; To improve water quality and efficiency; To increase resilience to climate change, including flood risk; To reduce air and noise pollution; To reduce greenhouse gas emissions; To sustain economic growth and competitiveness across the Borough; To ensure the provision of high
• Stage 7: Deliverability of sites taken forward from stage 6;

• Stage 8: Consider capacity of sites taken forward from stage 7.” (p12)

13) Most tellingly, it is made explicitly clear in the Additional Sites and Options consultation (May 2017) that the change in preferred option (to option SS5) is entirely driven by the “site selection” process:

“...the Council has identified through additional evidence collated since the close of the IOPA consultation that it is able to propose a higher housing target than was initially suggested, through:

• The inclusion of further allocations in the Local Plan which would provide housing;

• A reassessment of the capacity of the preferred allocations consulted upon in the IOPA document (as listed in appendix 1 of the IOPA document)

• The adjustment of a number of the assumptions factored in to the Council’s evidence base relating to housing supply.” (paragraph 2.4).

14) This is an inappropriate and unsound approach by the Council and fails to plan properly for the future development of its area contrary to the NPPF (and the NPPG) as well as the interests of its local community.

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?

15) The site selection process has assessed landscape impact with regard to the Surrey Landscape Character Assessment (2015). However, the Assessment is a very broad quality, sustainable constructed and affordable homes and necessary community infrastructure; To protect and enhance the Borough’s historic assets; To protect and enhance open space and the landscape character of the Borough.

7 Considers the deliverability/developability of sites and their availability.
brush assessment of landscape types. There is no detailed assessment of landscape impact of the individual proposed site allocations. This is a particular concern given the high landscape value of the area.

16) Air quality is a key issue for the District, as recognised by the Council’s Air Quality Strategy (2014) and as highlighted in Local Plan Chapter 4 “Issues and Challenges” (references to air quality in terms of “weaknesses”\(^8\), “opportunities”\(^9\) and “threats/challenges”\(^10\), Chapter 6 “Health & Wellbeing”\(^11\) and being highlighted as an important consideration for a number of proposed residential development allocations (although bizarrely not Longcross Garden Village through which the M3 runs). Despite this the ‘Air quality modelling to support the Runnymede Local Plan – Final report’ (May 2018) has only been undertaken and published at the end of the plan making process. Moreover, it does not assess proposed allocations. This is a significant omission in relation to, for example, the proposed Longcross Garden Village, which is bisected by the M3, given that the Air Quality Strategy itself states that annual average NO2 concentrations along the M25 and M3 are predicted to increase due to increased usage (p28). Moreover, there is no indication that the Council has at its disposal a comprehensive set of historic air quality data covering the areas now proposed for extensive residential development at Longcross.

17) There is no assessment of noise impacts across the borough, despite this being a potentially significant issue. This is a particular concern for the proposed Longcross Garden Village as it is bisected by the M3.

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8 “Whilst the Borough’s proximity to the motorway network is a strength in many respects, it can have a negative impact on residents’ quality of life e.g. congestion and air quality.”
9 “To reduce pollution in Air Quality Management Areas (AQMAs).”
10 “There is increased car dependence causing increased congestion and air pollution”.
11 “Air pollution is an important determinant of health. Numerous epidemiological studies, including large cohort studies that follow people’s health over several years, have found an association between air pollution and a wide range of adverse health effects (World Health Organisation Regional Office for Europe, 2005). Estimates of the percentage of mortality attributable to long term exposure to particulate air pollution in Runnymede is 4.9%. This is higher than England and the South East averages (both 4.7%) (Public Health England, 2017)” (paragraph 6.12).
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?

18) The Council’s purported infrastructure assessments suffer from the same fundamental flaw that there is no overarching strategy guiding where infrastructure should be delivered and it is instead driven by the location of housing potential sites, largely as promoted by the development industry. As a consequence, housing/development is being promoted in locations, including in and near Virginia Water, which are inherently unsustainable and/or do not have the requisite infrastructure in place (or capacity to deliver such infrastructure). Again, this is an unsound approach and is contrary to national policy and guidance.

19) To illustrate this concern, the Runnymede Infrastructure Needs Assessments: Stage 1A and 1B Report (April 2017) summarises existing infrastructure (the “Infrastructure Baseline”, Chapters 4-13); provides assessments of future requirements on a borough wide basis (“Future Needs”, Chapters 19-24) and then sets out the needs generated by specific proposed development sites (“Infrastructure Requirements for Allocated Sites”, Chapter 25 and four additional sites in the Runnymede Infrastructure Needs Assessment Stage 1A and 1B Report Addendum – Assessment of additional sites (May 2017)). However, the assessments of future requirements are simply calculated on the basis of total population growth and are not based upon any overarching strategy. Similarly, the needs generated by specific proposed development sites are calculated in the absence of any understanding about the needs of the wider settlements themselves.

20) The Assessment concludes with “next steps” which again reinforces how the selection of sites, rather than an overarching strategy, is driving the process:

“This INA has set out the baseline of existing infrastructure capacity in Runnymede. It has assessed demand likely to arise over the Local Plan period from planned growth and the type, timing and location of infrastructure projects and investment required to meet this demand. The site specific
analysis lays the foundations for infrastructure plans for key development sites which will deliver growth over the Local Plan period. The intention is that this INA is used for consultation with RBC’s partners under the DtC.” (paragraph 26.3.1, emphasis added).

21) The subsequent Runnymede Infrastructure Delivery Plan (December 2017), which forms part of the evidence base for the Local Plan, has the same flawed structure in that it summarises existing infrastructure (Chapter 4); the priorities for future infrastructure requirements on a borough wide basis (Chapter 6) and then the priorities for future infrastructure requirements for specific proposed development sites (Chapter 7). Again, therefore, it suffers from the fundamental problem that there is no overarching strategy guiding where infrastructure should be delivered and it is instead driven by the location of specific sites.

22) The Infrastructure Delivery Plan (December 2017) assessment of Secondary Education provides a stark example of these fundamental failings (paragraphs 4.2.15-4.2.20). The Assessment sets out existing provision, explaining that it consists of four schools and that there will be a shortfall of spaces by 2017/18 (the earlier April 2017 assessment suggested there was a surplus of spaces). It then suggests that future provision will comprise the Runnymede Free School and the development of additional capacity within Salesian School. In doing so, it concedes that because the proposed Longcross Garden Village would generate too few pupils (491) to support a new secondary school:

“...residents will be required to access existing secondary education provision within the surrounding Chertsey area. Whilst Salesian School is situated close to the Longcross Garden Village site and additional FoE are planned to be provided there, admissions are selective on the basis of Catholic faith making it unsuitable to accommodate all new pupils from the Longcross Garden Village site. Consultation with SCC has confirmed that expansion of an existing school to accommodate demand generated by the Longcross Garden Village site will be made within the Chertsey area, at a secondary school yet
to be confirmed.”

23) It can be seen, therefore, that infrastructure demands are responding to a proposed allocated site as opposed to the Council undertaking a Borough-wide review of their principal infrastructure requirements and demands before establishing a strategy as to where best to allocate development by reference to those requirements and demands etc. Self-evidently, this is poor planning and contrary to policy.

24) A similar failing afflicts the assessment of proposed sites’ capacity. The Site Capacity Analysis: Final Version (December 2017), which inputs into the Site Selection: Methodology and Assessment at Stage 8, explains that “in undertaking an analysis of the potential capacity of sites to take forwards for allocation a number of assumptions have been taken into account” (paragraph 2.1).\textsuperscript{12} However, these are all site-specific issues and do not take any account of the accessibility of the site or the capacity of surrounding services, all of which would ordinarily inform a strategic approach.

25) The A320 is acknowledged by the Council and their consultants as being a key piece of infrastructure. Indeed, it merits its own Topic (July 2018) which explains that this is:

“because it is the only piece of critical highways infrastructure which has been identified as being necessary to support the growth which is proposed to be delivered through the Runnymede Local Plan.” (paragraph 1.1).

\textsuperscript{12} “Mix of residential types including market and affordable housing and whether there is capacity to accommodate specialist housing such as care/nursing/extra care and/or Gypsy/Traveller pitches;
Size of dwellings in terms of bedroom numbers which drives occupancy levels;
Size of dwellings in terms of land take;
Estimated population derived from each site based on standard occupancy rates (see below);
Ratio of employment floorspace to land take based on different uses;
The need to provide for green infrastructure in line with proposed standards and whether a site is large enough to provide its own bespoke SANG solution for residential led development;
Other on-site infrastructure i.e. roads, access, general amenity/landscaping space;
Constraints/Issues highlighted in Stages 3 and 4 of the Site Selection Methodology & Assessment i.e. landscape character, BOAs, flood risk, air quality etc.”
Despite this, the assessment work of the A320 commenced very late in the plan making process (‘Feasibility Study – Interim Report (DRAFT)’ (December 2017) and ‘Feasibility Study Final Report’ (April 2018)). Importantly, Highways England has outstanding objections to the emerging Local Plan including to the A320 proposals. We are also concerned that there are a number of fundamental flaws in the report and that it remains incomplete, including:

- Study period: the study period to 2035 is not consistent with the revised Local Plan period which now runs to 2030. This is contrary to guidance in the NPPG\textsuperscript{13} and Circular 02/2013\textsuperscript{14}. Notwithstanding the view of Surrey County Council (letter of 4 May 2018), this remains a key concern.

- Intervening period: there is no assessment of the intervening period between 2017 and 2035 which would give greater explanation to expected traffic impacts with and without highways intervention/upgrade schemes

- Detailed modelling and design work required: the report concludes that much further study, design, modelling and feasibility assessments are required. Despite being a “final report” the report is inconclusive as only the most basic of each scheme component is to be taken forward for further analysis, including detailed modelling, with others held in reserve if the modelling is not supportive. This includes consideration of the feasibility of acquiring land for major highways works. Given that the modelling and other detailed studies are incomplete it is not possible to draw any conclusion as to whether the A320 proposals would provide the necessary additional capacity in a timely manner to meet the increased demand associated with the Council’s proposals, without unacceptable knock-on impacts.

\textsuperscript{13} “The assessment should ideally cover the period of the Local Plan, taking into account all the changes and improvements in, for example, technology and behaviour that is likely to happen in that time. Circular 02/2013 sets out provisions for the Strategic Road Network and assessment years at paragraphs 25 to 27.” (paragraph: 011 Reference ID: 54-011-20141010).

\textsuperscript{14} “The overall forecast demand should be compared to the ability of the existing network to accommodate traffic over a period up to ten years after the date of registration of a planning application or the end of the relevant Local Plan whichever is the greater. This is known as the review period.” (paragraph 25).
• Full Environmental Impact Assessment of the A320 and other Local Plan proposals: the report does nothing to allay concerns over aggregated or cumulative impacts of the schemes that have been outlined. More study and demonstration is required in this area to assess impacts such as noise and air quality.

27) Testing the viability of proposed allocations is fundamental to demonstrate that the proposed allocations are deliverable. However, this commenced very late in the plan making process (the ‘Viability Whole Plan Testing – Draft Final Report’ (December 2017) and ‘Longcross Garden Village – Infrastructure and Viability Assessment’ (December 2017)). This again demonstrates the lack of considered and strategic thinking on behalf of the Council.