Runnymede Borough Council
Local Plan (2030)

Examination Statement – Matter 3 Overall Spatial Strategy

Prepared on Behalf of Fairoaks Garden Village Ltd

November 2018
Contents

1. Introduction 3
2. Matter 3: Overall Spatial Strategy 4
3. Conclusions 7

Appendices 8
Appendix 1 –Land Use Parameter Plan (July 2018) 9
1. Introduction

1.1. This Examination Statement is submitted on behalf of Fairoaks Garden Village Ltd (FGVL) in response to the Inspector’s questions in relation to the Runnymede Borough Council (“RBC”) Local Plan 2030. The Statement relates to a proposed new settlement located on the border of Surrey Heath Borough Council (SHBC) and RBC.

1.2. This follows representations submitted in June 2018 on the Regulation 19 of the Local Plan (2030). FGVL representations addressed the soundness of the Local Plan, notably whether a positively planned approach to the provision of Suitable Alternative Natural Greenspace (SANG) and with respect of the Green Belt generally has been made. The position of FGVL is not to oppose the Local Plan per se, rather to ensure that it is adequately robust to respond to the changing circumstance of a potential planning approval at Fairoaks Garden Village, and the likely positive benefits this has for RBC.

1.3. The planning case for the delivery of a new settlement now is predicated on the basis of the NPPF Revision ‘very special circumstances’ for development of a predominantly brownfield site in the Green Belt.

1.4. A planning application was submitted to SHBC and RBC and was validated by the Councils on 5th October 2018 (SHBC reference 18/0642 and RBC reference RU.18/1615). The position of FGVL as outlined in the application and supporting plans (notably parameter plans), is that no built development is proposed in RBC. The proposal for RBC is SANG/ open spaces (with associated infrastructure), and off-site infrastructure contributions as required. An Illustrative Masterplan is included in Appendix 1 of the 2018 representations, as updated during the formulation of planning application process (Appendix 1 of this Statement includes the updated Land Use Parameter Plan).

1.5. This statement concerns Matter 3: Overall Spatial Strategy, which ‘deals with the soundness of the overall spatial strategy apart from the justification for review of the Green Belt which will be considered under Matter 4. The remaining SD and other policies, including the site-specific implications of policies and proposals in the Plan, will be considered in the Stage 2 hearings’.
2. 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?

2.1. FGVL has no specific comment to make on this question as it relates to the broad spatial strategy for RBC. FGVL comments concern the implications of not referencing the FGV proposals and the implications this may have on the long term robustness of the Plan. FGVL Regulation 19 representations set out suggested amendments that can be made to the plan to ensure that the Plan is adequately responsive to the benefits this proposal could bring to RBC, should the application be successful. The benefits, notably in relation to the delivery of SANG are set out in this Statement.

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

2.2. No.

2.3. FGVL has concerns that the approach to Suitable Alternative Natural Greenspace (SANGs) demonstrates a clear and unequivocal shortfall, which affects the robustness and effectiveness of the Plan. Greater certainty is required that the Plan is deliverable over the whole plan period.

2.4. Within SD_0161 (Statement of Consultation) RBC recognise a shortfall of SANG provision in the Local Plan stating “By officers’ calculations, there are predicted to be approx. 575 dwellings that do not currently have SANG mitigation in place over the period of the Local Plan. It is predicted that further SANG would be needed by 2025.” On this basis we would question whether the Local Plan is either positively prepared or effective.

2.5. The failure to allocate sufficient SANG questions the deliverability of the plan over the plan period, with the delivery of dwellings predicated on SANG to provide mitigation. The recognised shortfall in SANG provision does not provide a Local Plan that is based on a strategy to meet objectively assessed development and infrastructure requirements nor that is deliverable over the plan period.

2.6. The inclusion and allocation of FGV for SANG would cater for the identified unmet need as FGV provides
additional capacity for the delivery of 1,499 homes (based on 8ha per 1,000 people), and would therefore help ensure the soundness of the Local Plan in respect of SANG and the necessary Thames Basin Heath SPA mitigation.

2.7. Notably, as set out in the Regulation 19 representations (and as recognised by RBC in SD_0161) publicly accessible open space can be a compatible use in the Green Belt, and therefore no amendments to the Green Belt boundaries are sought by FGVL.

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?

2.8. No.

2.9. The potential achievable enhancements to the natural environment and biodiversity through adequate SANGs provision has not been realised. The specific Green Belt benefits of safeguarding the land at FGV for SANG are set out within our Matter 4 Statement.
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?

2.10. As set out in FGVL answer to 3.1 b) and c), the recognised shortfall in SANG provision over the plan period puts in question the deliverability of the plan post 2025. Proposed policy EE10 states that “over the lifetime of the Local Plan, should the Council not be able to demonstrate there is sufficient Suitable Alternative Natural Greenspaces capacity for mitigation, the Local Plan will need to be reviewed”. This provides for no guarantee or confidence that the shortfall will be addressed in a timely manner.

2.11. The position of FGVL is for the prospect for FGV to be recognised in the Plan. This can be achieved through recognition of the contribution SANGs can make as suitable Green Infrastructure in the Green Belt.

2.12. No amendment to the Green Belt would be required, nor would the delivery of SANG be specifically reliant on the delivery of FGV per se, as there is still a circumstance whereby this infrastructure is provided to solely meet the wider development needs of the Borough. Clearly, the delivery of FGV would provide one mechanism to enable the SANGs but not the only. The SANGs equate to a land area of circa 53 hectares.

2.13. In addition, the delivery of FGV would provide another opportunity to realise the benefits associated with the A320 corridor improvements.

2.14. Land at Fairoaks should therefore be specifically safeguarded as SANG in policy EE10 with reference made to a key Biodiversity Opportunity Area (BOA) in policy EE11 and on the Proposals Map.

2.15. In addition, should FGV be granted planning permission, then the associated potential benefits on the A320 would be realised. The delivery of such should not be precluded by the Plan. The Plan should be resilient and thus recognise the opportunity for sustainable transport enhancements and where possible infrastructure enhancements to the A320 corridor. This would include the provision of a new sustainable transport corridor/link on the FGV site, between A319 and A320. The opportunity for such need not be precluded by the Plan. Thus amendments to SD4 (Active & Sustainable Travel) and the Proposals Map, are required which provide a positively planned response to this scenario. The proposed BOA off the A319 at Guildford Road (north of the River Bourne) can easily be relocated to incorporate the much larger area of land proposed as SANG as part of FGV.
3. Conclusions

3.1. FGVL respectfully requests that Main Modifications are made to the Plan, as summarised in Appendix 2 of FGVL representations.
Appendices
Appendix 1 – Land Use Parameter Plan (July 2018)
This drawing is for planning purposes only. It is not intended to be used for construction purposes. Whilst all reasonable efforts are used to ensure drawings are accurate, JTP accept no responsibility or liability for any reliance placed on, or use made of, this plan by anyone for purposes other than those stated above.

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**Notes:**

- **Land Use Plan**
  - Residential Use (C3)
  - Mixed Use (A1-A5, B1, C1, C3, D1 and D2)
  - Employment/Business area (B1, B2 and B8)
  - Primary School (D1)
  - Industrial employment (D1)
  - Older People's Housing with ancillary retail and commercial use
  - Suitable Alternative Natural Greenspace (SANG)
  - Formal sports pitches and associated car parking
  - Village Green
  - Village Square
  - Access route into employment site
  - Primary vehicular route
  - High Street/Link Road
  - Existing Wey Farm Kennels and grounds
  - Existing buildings to be retained and repurposed for community use (A1, C2/C3, D1 and D2)

- **Parameter Plan 01**
  - Land Use Plan
  - Infrastructure
    - Access route into employment site
    - Primary vehicular route
    - High Street/Link Road
  - Existing Wey Farm Kennels and grounds
  - Existing buildings to be retained and repurposed for community use (A1, C2/C3, D1 and D2)
  - Existing roads
  - Existing watercourse and waterbody
  - Existing building
  - Borough boundary
  - Application boundary

**NOTES**

- **All areas shown in yellow with other outline indicate areas of land to be reserved as soft landscaping for SuDS / HAVID (Min. 6% of the residential developable area must be reserved as soft landscaping for SuDS / HAVID)**
- **Samples of phases and associated car parking**
- **Public Open Space**
  - Existing woodland, trees and plants (including existing ancient woodland and buffer; and existing watercourses, woodland, trees, formal sports areas, children's play areas, pedestrian and cycle, equine and internal street network)
  - Proposed realignment of Wey Farm access road
  - Proposed Local and suitably placed Area of Public Open Space (Including SANG)
  - Proposed road infrastructure includes carriageway, green verges, swales and footway/cycleways. The High Street / Link Road and primary vehicular route alignment may deviate +/-5m within the application boundary, subject to the minimum widths of public open space as set out in the accompanying Strategic Design Code.

- **Extensive land uses can deviate +/-5m within the application boundary, subject to the minimum widths of public open space as set out in the accompanying Strategic Design Code.**
- **Existing roads**
- **Existing watercourse and waterbody**
- **Existing building**
- **Borough boundary**
- **Application boundary**

**Scale Bar:**

- 1:5000

**Client:**

- FAIRWAYS GARDEN VILLAGE LTD

**Drawing No.:**

- Parameter Plan 01:
  - Land Use Plan

**Revision:**

- 01063

**Date:**

- P1: 05.07.18
  - YQ
  - CSM
  - H
  - For planning application
  - X
- P2: 24.07.18
  - YQ
  - ECC
  - Broad location of helipad
  - Broad location of Local Equipped Area of Play (LEAP)
  - Broad location of Neighbourhood Equipped Area of Play (NEAP)
  - Broad location of sports pavilion/SANG visitor centre and associated car parking
  - Broad location of CHP
  - Broad location of existing SuDS/drainage features and local areas of play
- P3: 06.08.18
  - YQ
  - ECC
  - For planning application

**Scale:**

- 1:5000

**Description:**

- Use made of, this plan by anyone for purposes other than those stated above.

- Areas shown in yellow with other outline indicate areas of land to be reserved as soft landscaping for SuDS / HAVID (Min. 6% of the residential developable area must be reserved as soft landscaping for SuDS / HAVID).
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