Runnymede Local Plan Examination – Main Matters Issues and Questions

Matter 1: Legal requirements, the Duty to Co-operate and the Plan period

Representor reference number: 2288

WYG on behalf of Kitewood Estates Limited
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**Matter 1: Legal requirements, the Duty to Co-operate and the Plan period**

1. This statement has been prepared by WYG on behalf of our client, Kitewood Estates Ltd (Kitewood). It should be read in conjunction with representations upon the submitted plan, dated June 2018 (Representation ID: 2288).

2. Kitewood’s concerns from previous representations remain unaddressed. These relate to an inadequate supply of housing to meet identified needs, the spatial strategy particularly the lack of provision within Woodham/New Haw and the methodology used for the Green Belt Review.

3. Kitewood are particularly concerned about the omission of the 12.8 hectare site under their control at Wey Manor Farm, New Haw (SHLAA Ref: 129). The site can deliver a minimum of 220 dwellings, including a significant proportion of affordable housing. The additional uses could include; Employment (B-Classes), retail and leisure-uses (Classes A1-A4 and D1), alongside complementary Class C2 and D1 residential and non-residential institutions (i.e. Care Homes, Doctor’s Surgeries and Nurseries). Kitewood retain a flexible approach to the additional uses provided on site and are keen to work with the Council to identify and deliver uses which would assist in meeting any shortfall or deficiency identified in the submitted plan. The site can also deliver, as a minimum, policy compliant SANG and open space. A context plan and Concept Masterplan for the development of this site are enclosed at Appendix 1 of our Matter 3 hearing statement.

4. In conformity with the Inspector’s Guidance Note (ID-01) we have framed our response within the context of the 2012 version of the NPPF against which the plan should be assessed, paragraph 214 2018 NPPF. We do, however, reference the 2018 NPPF to explain the Government’s desired direction of travel upon certain issues.

1.1 **Is the Runnymede 2030 Local Plan (the Plan) compliant with the Planning and Compulsory Purchase Act (2004) (as amended) and the 2012 Regulations (as amended)? In particular, is the Plan compliant with the Local Development Scheme and the Statement of Community involvement?**

5. Kitewood has no further comments at this stage.

1.2 **Is the Habitats Regulation Assessment and the Sustainability Appraisal (SA) adequate? Does the SA demonstrate that the Plan has been tested against all reasonable alternatives?**
6. No, the SA does not consider reasonable alternatives in relation to the distribution of growth. Part 3A of the updated January 2018 Sustainability Appraisal (SD_018M) identifies seven alternative options relating to the spatial strategy (Table 2.2a). The options consider variations upon the housing requirement and whether the village of Thorpe is retained or released from the Green Belt. None of the options consider reasonable alternative distributions. For example, greater levels of development proposed within the local centres of Virginia Water, Woodham/New Haw, Englefield Green and Ottershaw. This is considered a flawed approach. Further discussion is included within our Matter 3 statement in relation to question 3.1b.

1.3 Does the Plan as a whole accord with s19(1A) of the Act by including policies that are designed to secure that the development and use of the land in the Borough contribute to the mitigation of, and adaptation to, climate change?

7. Our client has no further comments at this stage.

1.4 Has the Council engaged constructively, actively and on an on-going basis with all relevant organisations on the strategic matters that are relevant to the Plan’s preparation, as required by the Duty to Cooperate?

8. I refer the Inspector to our previous comments upon the submitted plan.

1.5 Is the Plan period (2015-2030) justified? If not, how should this be rectified?

9. No, the 2012 NPPF paragraph 157 is clear that Local Plans should;

 “…be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date…”

10. The 2018 NPPF paragraph 22 builds upon this stating;

 “…Strategic policies should look ahead over a minimum 15 year period from adoption…”

11. The plan will only achieve 11 years post adoption, presuming it successfully negotiates the examination in a timely fashion. Any delay in the adoption of the plan will reduce the time horizon further. It has been Kitewood’s case, that the plan period should extended to 15 years post adoption, and absent that, that the plan should not be found sound, until the additional work to support that time period extension including updating the SHMA, and undertaking a full review of Green Belt, has been completed.