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

At para 1.1 the Inspector asks:

"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?"

We do not consider that the local plan is compliant with the necessary legislation, for at least the reasons that we have previously referred to and also the responses to the Inspector questions below. In this respect it is neither ‘positively prepared’ and ‘justified’. At paragraph 2.12 of the LDS there is a list of anticipated studies. An example however as to the deficiency of the evidence base is that through our discussions with the Council we were advised that the Council would also produce a Topic Paper on SANG, but no such paper has been produced and in response to our more detailed questions of the Council on this topic they have not been able to provide detailed responses.

At para 1.2 the Inspector asks:

"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?"

We do not consider that the SA does adequately reflect all alternatives in that it fails to have regard to the potential of PDL sites within the Green Belt to deliver much need
housing, including affordable housing. The potential of some of these sites, such as our clients site, has not been realised or fully realised.

At para 1.5 the Inspector asks:

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

Based upon the current plan timescale it will be at least four years into the plan period before it is adopted. There was a SHMA published in 2015, but this was updated in 2016 and so considers a period that is inconsistent with the overall plan period. The plan period should be adjusted accordingly so that the plan and the housing and employment aspects are the same.