MATTER 4 HEARING STATEMENT

Runnymede Borough Council Local Plan Examination

SUBMITTED ON BEHALF OF MUSE DEVELOPMENTS LIMITED

November 2018
Contents

1  Introduction..................................................................................................................................................4

2  Matter 4 – Green Belt Boundaries and Exceptional Circumstances ..............................................5
1 INTRODUCTION

1.1 This statement has been prepared on behalf of Muse Developments Limited (‘Muse’).

1.2 Muse supports the fundamental aim and purpose of the Runnymede Local Plan in seeking to identify sites sufficient to accommodate the identified levels of growth for the plan period.

1.3 Muse is in the process of preparing a detailed planning application for the development of the land at Thorpe Lea Road West, Egham (SL8). As part of this process, Muse has engaged in a series of pre-application discussions with the Council and other key local stakeholders. Muse has also requested and received a Screening Opinion from the Council pursuant to the EIA Regulations.

1.4 The site (SL8) is identified as having capacity to deliver a minimum of 250 residential units and within the period 2019-2024.

1.5 Both the target capacity of the site and the delivery phasing are supported as a matter of principle by Muse.

1.6 Muse will attend the Stage 1 Hearings Examination in support of the proposed allocation of the SL8 site at Thorpe Lea Road, Egham. It will seek to assist the Inspector on the matter of the deliverability of the site following the process of assessment prior to the submission of a detailed planning application.

1.7 Muse will also attend the Stage 2 Hearings Examination once further details of the process and programme emerge.

1.8 For clarity, we can confirm that Muse supports the Council in its case regarding Matters 1 – 3 of the Stage 1 Hearings Examination, specifically:

- That the Council has met the legal requirements of the Local Plan making process, including discharging its duties under the Duty to Cooperate in a reasonable and practical manner;
- That the Local Plan period proposed (2015-2030) covers a 15 year period (backdated) that reflects a practical period for assessment, but which is capable of being rolled forward and in any event will be subject to review within the 5 years from adoption in accordance with the Local Plan Regulations 2017 (S.I. 2017/1244);
- That the Council is capable of justifying its approach to the identification and accommodation of the objectively assessed needs for housing and employment land. It is noted that several changes in Government guidance following the submission of the Local Plan have taken place, yet the Council maintains a pragmatic and practical approach to the matter. Any identified longer term deficiencies that arise, as a result of the changes in Government guidance or otherwise, can be remedied satisfactorily in the Local Plan review process; and
- That the overall spatial strategy for the Local Plan is supported in principle.
2  MATTER 4 – GREEN BELT BOUNDARIES AND EXCEPTIONAL CIRCUMSTANCES

2.1 We respond to the specific matters arising in relation to Matter 4 below

Question 4.1

Having regard to the Green Belt’s purposes and subject to consideration of the implications of the Plan’s specific proposals, do exceptional circumstances exist to justify changes to Green Belt boundaries in the Borough? In particular:

a. Does the Plan’s strategy make as much use as possible of suitable brownfield sites and underutilised land, including estates regeneration and surplus public land where appropriate?

b. Does the strategy seek to optimise the density of development in line with national planning policy to make the most effective use of land?

2.2 The approach of the Local Plan to the assessment of the Green Belt and the exceptional circumstances that have been identified as sufficient to justify a change in the Green Belt boundary to accommodate development is supported.

2.3 The extent of evidence accrued by the Council in supporting the exceptional circumstances case is considerable. It has included a detailed assessment of the Green Belt including the publication of a number of stages of the review process, from the original high level review, to the detailed assessment of Green Belt boundaries.

2.4 In the matter of site SL8, the Council has undertaken further detailed assessment of the form and type of development that can be accommodated at the site. The extent of assessment undertaken by the Council has been exhaustive and leaves Muse in a position of being capable of submitting a detailed planning application for the development of the site. Throughout this process the relevant statutory consultees have been informed and duly consulted.

2.5 The extent of the development pressure in Runnymede is such that the Council evidence regarding need and capacity of the existing urban areas can be seen as entirely reasonable and proportionate. Furthermore, the extent of the constraints to growth arising from environmental and other designations, including heritage matters and flood risk, reduce the number and capacity of deliverable sites.

2.6 As such, the Local Plan has sought to make as much use of suitable and deliverable brownfield sites within the bounds of their constraints. Where the release of Green Belt has been identified as being required, the Council has sought to make the most efficient and effective use of the land in order to minimise the extent of the releases required to accommodate growth.
**Question 4.2**

*Having regard to the proposed releases of land from the Green Belt, does the Plan promote sustainable patterns of development?*

2.7 The approach to the spatial development strategy is supported in principle. It is driven by the identification of sites and areas that are located close to existing centres of population and with direct access to the services, facilities and infrastructure that serves them.

2.8 The Local Plan will deliver a continued balance of development by directing the majority to the existing settlements within Runnymede and as such will not adversely affect the spatial distribution of growth across the Borough as a whole. The proposals for the development at Longcross is the only significant intervention in the spatial development strategy for Runnymede, the development of which has been a long term aspiration of the Council.

2.9 The Local Plan seeks to focus of urban regeneration on the higher tier settlements that are best equipped to accommodate growth. Indeed, with growth comes the ability and justification to further improve the facilities and services of these centres.

2.10 As such, the Local Plan sets out and will deliver a sustainable pattern of growth.

**Question 4.4**

*Does the proposed release of land from the Green Belt take adequate account of the effects on broader purposes that it may serve e.g. provision for outdoor sports and recreation, access to the countryside, protection and enhancement of landscapes, visual amenity and biodiversity?*

2.11 The Local Plan is supported by a detailed evidence base, including a number of studies and assessments of need, capacity and the Green Belt. This suite of documents contributes to a deep understanding of the interplay between the need to accommodate growth and the most appropriate sites to achieve this.

2.12 In accordance with national policies and guidance, the evidence base that supports the plan sets out clear, logical and unequivocal evidence as to the suitability, availability and deliverability of the identified sites. With specific reference to SL8, the Local Plan evidence base and subsequent work undertaken by Muse in pre-application discussions with the Council and key local stakeholders confirms:

- That the site is deliverable and capable of being developed for the form of development proposed in the Policy;
- The proposed scheme does not give rise to adverse impacts on human health from noise/air quality from the M25 through the integration of design features and layouts that provide mitigation for the site and wider area;
- That account is taken of TPO 98 and a scheme of landscaping and vegetation is proposed that will secure a pleasant and green aspect for the site and achieve biodiversity gains;
- That the opportunities for the delivery of safe and attractive links to public rights of way are maximised;
- That the scheme includes sufficient mitigation to minimise the effect of development on the local road network and the provision of contributions to the wider sustainable transport network;
- That the scheme makes appropriate provision for contributions to local services and facilities, as relevant, to the proposed development and in accordance with the relevant regulations;
- That the scheme is supported by the relevant ecological and environmental assessments;
- That the scheme provides sufficient infrastructure to support the level and form of development proposed;
- The site is accessible and has access to a good range of local facilities and services;
- That the site can be effectively drained without increasing flood risk within and beyond the site boundary; and
- That, in the context of the Green Belt, the allocation of the site:
  - Would not result in the merging of neighbouring towns as the parcel of land performs weakly against this function;
  - Would not impact on the perceived sense of separation between settlements as it makes no discernible contribution to separation;
  - Is justified by the existence of strong, defensible long-term Green Belt boundaries;
  - Would not result in sprawl as the site boundaries are capable of providing a level of containment that prevents sprawl; and
  - Would accord with the existing semi-urban character of the site, containing as it does many urbanised features and surrounded in its entirety by development and existing transport infrastructure.

2.13 The detailed assessment of the Green Belt goes on to confirm that the SL8 site plays a limited role in respect of the wider strategic Green Belt and would not harms its overall integrity. It is also clear from the assessment undertaken by the Council and Muse, that the site does not play a role in the provision for outdoor sports and recreation, is not countryside that is capable of being accessed by the general public, is not a landscape that is worthy of protection and the development of the site will result in significant gains to landscaping provision, public access, visual amenity and biodiversity. It will also contribute significantly to the social and economic elements of sustainable development.