Runnymede 2030 Local Plan Examination

Representor No 703/1944 Jim Nichol/Brox End Nursery Residents Association (BENRA)

As chair of BENRA and Brox Lane Residents Associations (BLaRA), I represent the members and supporters who number in excess of 200 local residents and households.

1. **Matter 4**

2. **Question 4.1 (a)**

3. RBC has failed to fully support the concept of maximising use of brownfield sites before releasing green-field sites from Green Belt.

4. There are over 100 empty private houses within the borough. There are business premises which are empty and have been so for many years. Planning applications to re-use developed sites within the Green Belt are being refused.

5. **Question 4.1 (b)**

6. Throughout the Plan, RBC specifies the site build densities as ‘A Minimum of...’ at a stage when no planning applications have been considered or decided against NPPF criteria of appropriate density or design. To make the Plan sound, any attempt to estimate the total number of units on a development should be described as an ‘estimate’.

7. The Plan merely tries to cram as many units as possible on a site. The Plan does not acknowledge or consider any criteria other than surface area in regard to ‘effective use of land’.

8. **Question 4.2**

9. Lack of consistency with regard to changes in Green Belt boundaries. The permanence of the Green Belt boundaries depends on defensible boundaries. Example in ‘policy’ SL12: RBC rightly acknowledges and accepts an ancient public footpath as a defensible boundary but then suggests releasing from the Green Belt more land outside that same footpath within same ‘Policy’.

10. There are ‘policies’ within the Plan that show no Special Circumstances for releasing that land from Green Belt – given that simply providing housing is not a Special Circumstance.

11. **Question 4.4**

12. Within Runnymede, Ottershaw is currently an area of many rural landscapes and busy footpaths which are enjoyed by many for recreation. In this Plan, RBC has shown no regard to hundreds of representations from residents who want to maintain access to the countryside, its landscapes, visual amenity and biodiversity.