RUNNYMEDE 2030 LP EXAMINATION

MATTER 4: GREEN BELT BOUNDARIES AND EXCEPTIONAL CIRCUMSTANCES

STATEMENT ON BEHALF OF ST EDWARD
(Representor ID : 1498)
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Appendix 1 – Context Plan (Land at NE Ottershaw)
1. **Introduction**

1.1 This Statement is submitted on behalf of St Edward, and follows representations made on their behalf throughout the emerging Local Plan process.

1.2 St Edward are a joint venture company owned by the Prudential Assurance Company and Berkeley and have an interest in an omission site at North East Ottershaw (referred to as Site 46 in the SLAA). Representations have been made previously setting out the merits of the site, but this Statement focusses upon the specific questions asked by the Inspector.

1.3 As way of background, the latest context plan for the proposed scheme at NE Ottershaw is included at Appendix 1.
2. **Matter 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?**

2.1 The answer to this question is Yes. More detailed reasoning is set out below in response to the associated questions asked by the Inspector, but the underlying exceptional circumstance is that without making amendments to Green Belt boundaries, and enabling associated development, the Borough would not be able to provide for its housing and health requirements. The consequence of this would be to exacerbate the existing affordability issues in the Borough and have an adverse impact upon health provision and economic growth in the area.

2.2 Such reasoning is further supported by the fact that a number of Green Belt Reviews have identified many areas within the Borough that do not perform strongly against the purposes of the Green Belt, and could be released from the Green Belt without detracting from the fundamental aim and purpose of the designation.

2.3 Representations have been submitted separately on behalf of St Edward, explaining that the Council have failed to allocate some parcels identified within the Green Belt Review Part 2 as appropriate for release, within the Local Plan, in particular Land at NE Ottershaw. As a result, the precise Green Belt boundary changes within the Local Plan are not supported, but the principle that requires amendments to be made to the boundary as part of the Local Plan is entirely justified.

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?**

2.4 For reasons explained within pages 18 and 19 of the Council’s Exceptional Circumstances Document (Jan 18), it is considered that the Plan has made as much use as possible of such land.
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?

2.5 For reasons explained at page 19 of the Council’s Exceptional Circumstances Document (Jan 18), it is considered that the strategy does seek to optimise the density of development. Representations have previously been submitted in response to a number of the allocated sites highlighting that assumed densities are in fact too high, and do not give sufficient consideration to constraints and/or the local context and character. It is therefore suggested that the desire to optimise density has actually resulted in an indicated capacity that is too high in a number of circumstances. Such matters will be assessed when detailed sites are considered at later Hearing sessions.

c) Is it clear that the Plan has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development?

2.6 As explained at paragraph 1.47 of the Council’s Exceptional Circumstances Document (Jan 18), ‘no Local Authority partner has shown a willingness or ability to meet any unmet housing needs from Runnymede’. 
3. **Matter 4.2**

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

3.1 The Green Belt releases are associated with the larger settlements in the Borough, and as a result will typically be associated with existing services and infrastructure, so to that extent offer sustainable locations for new development.

3.2 However, other than the new settlement at Longcross Garden Village, the Green Belt allocations do not take the opportunity to introduce facilities within them to promote sustainable patterns of development. The vast majority of allocations simply provide for the dwellings themselves, without associated services or facilities that are necessary to support sustainable development. This is particularly the case given the current deficit in the provision of Primary School provision, Outdoor Sports facilities, and the forecast shortage in SANG provision. Such provision has not been provided for within the vast majority of allocations, despite being identified within the IDP as being necessary to support the planned growth of population in the Borough.

3.3 Concern is also expressed that Green Belt allocations have not provided certainty with regards to the required works associated with the A320. Allocations have instead been identified that may have a negative impact in terms of congestion, with harmful environmental impacts as a result, which will detract from sustainability aims.

3.4 In order to address such concerns, and enable sustainable patterns of development, alternative/additional allocations should be identified that can provide the infrastructure and facilities necessary for the Borough’s planned growth. This should include land at SLAA Site 46 (NE Ottershaw), which as demonstrated at Appendix 1, can significantly contribute towards playing pitches, SANG provision and the recommended A320 junction enhancements.
4. **Matter 4.3**

Are there adequate reasons in this case for not identifying safeguarded land as part of the Green Belt review? Are the consequences for the permanence of the Green Belt boundaries acceptable?

4.1 Safeguarded land should be identified as part of the Green Belt review.

4.2 The Council have recognised that the Green Belt boundary needs to be amended, and therefore need to follow the NPPF (2012) guidance on the issue of how to define boundaries. This requires that local authorities should;

- ‘where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period.’ And…….

- ‘satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period’

4.3 By not identifying any safeguarded land within the Local Plan, the Council are effectively confirming that they have no requirement to look beyond existing urban areas and current allocations in order to provide for their longer term development needs beyond the Plan period. However, this is in direct conflict with the Council’s reasoning for shortening the Plan period from 2035 to 2030, this being that they cannot identify sufficient sites to serve the housing requirements for the Plan period to 2035.

4.4 As a result we have a scenario in which the Council are acknowledging that the allocations identified in the Local Plan will only provide for the current Plan period, and not beyond it. This is precisely the scenario in which the NPPF requires safeguarded land to be identified – to meet longer term development needs. If the Council were making the case that their longer term needs will be met through means other than Green Belt allocations (such as urban densification, or provision by neighbouring authorities) then there may be some justification in avoiding the identification of safeguarded land. However, the Council are making no such case, which is understandable and correct.

4.5 For reasons explained within previous submissions on behalf of St Edward, it is strongly considered that some Green Belt sites (including land at NE Ottershaw at Appendix 1) have been identified by the Green Belt Review Part 2 as appropriate for release from the Green Belt, but have not been allocated for development by
the Council. As a result, there can be no suggestion that the Council’s Green Belt analysis has exhausted all potential for appropriate development in the Green Belt. If it was the Council’s case that there are no alternative sites in the Green Belt that can come forward for longer term development then there would have been no need to shorten the Plan period.

4.6 In response to the question therefore, there are no adequate reasons for not identifying safeguarded land in this instance.

4.7 With regards permanency of the resulting Green Belt boundary as proposed in the Local Plan, the above comments explain why no such permanence can be expected. As acknowledged by the Council, the allocations within the Local Plan will only provide for development requirements until 2030, and even this is contested by representations made. It is therefore inevitable that in order to provide for development requirements beyond 2030 additional allocations will be needed.

4.8 The Council have explained within their Exceptional Circumstances Document that all attempts have been made to maximise development opportunities from non-Green Belt land. It is therefore unreasonable to suggest that there is any likelihood of long term development requirements being achieved from non-Green Belt land. It follows that it is very likely that the Council’s longer-term development requirements will need to be delivered through additional Green Belt allocations.

4.9 Given the above, there is no likelihood that the currently proposed Local Plan Green Belt boundary will remain beyond the Plan period. The Council’s approach is therefore in direct conflict with the NPPF which requires such boundaries to endure beyond the Plan period. Amendments to the Local Plan should therefore be undertaken, involving the identification of additional allocations / safeguarded land, to ensure that further amendments to the Green Belt boundary will not be necessary beyond the Plan period.
5. **Matter 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 eg provision for outdoor sports and recreation, access to the countryside, protection and enhancement of landscapes, visual amenity and biodiversity?

5.1 The proposed Local Plan Green Belt releases do not give proper consideration to the broader purposes, or beneficial use of the Green Belt, as set out at paragraph 81 of the NPPF (2012).

5.2 The suggested revised Green Belt boundary will not enhance the beneficial uses of Green Belt land to any notable extent. It is a missed opportunity to follow national guidance on the matter, caused by the incorrect/insufficient allocation of Green Belt sites.

5.3 The concern is compounded by the fact that the Council have a recognised deficit in the provision of a number of these broader Green Belt purposes, notably outdoor sports and SANG provision, which can contribute to biodiversity, recreation, access to the countryside and enhancement of landscapes.

5.4 Statements on behalf of St Edward in response to Matters 1 and 3 have highlighted the deficiencies in respect of outdoor sport and SANG provision in the Local Plan. The fact that the vast majority of Green Belt allocations proposed by the Council do not address this, effectively acknowledges that the deficits will continue throughout the Plan period, and the beneficial uses of the Green Belt are not maximised.

5.5 Alternative / additional Green Belt allocations have been proposed to the Council, notably land at NE Ottershaw, that can enhance the beneficial uses of the Green Belt referred to in national guidance. The Context Plan at Appendix 1 illustrates how substantial SANG provision, and associated access and recreation can be ensured through the release of associated land. This would also enable the enhancement of landscapes and visual amenity in an area designated as a ‘Landscape Problem Area’, highlighting it’s potential for enhancement in this respect. An area dedicated to playing pitches, to provide for outdoor sport is also shown.

5.6 Whilst it is understood the question relates to the general approach taken by the Local Plan, the cross reference to the omission site at NE Ottershaw is considered to highlight the benefits that can be obtained through Green Belt release,
consistent with national policy. The Council’s proposed Green Belt release has failed to notably enhance the beneficial uses of Green Belt land, and the Local Plan should be amended, through the incorporation of additional/alternative allocations, to enable such improvements to be achieved.
APPENDIX 1 : Land at NE Ottershaw (Site 46) Context Plan