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 4: Green Belt Boundaries and Exceptional Circumstances

At para 4.1 a) the Inspector asks:

"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?“.

We do not agree that the Plan’s Strategy does this, in that it fails to optimise brownfield sites that are included on the Councils Brownfield Register and whilst within the Green Belt are PDL and therefore can deliver much needed housing, including much needed affordable housing, without impacting on employment land or requiring the Green Belt boundary to be changed. There are underutilised sites where the full benefits of release for housing are not being taken, yet they would deliver much needed housing.

In this respect of the Plan’s Strategy this is flawed and in our view contrary to the most recent version of the NPPF, notwithstanding that the plan is due to be considered against the earlier version.

At para 4.1 b) the Inspector asked:

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

We do not agree that the strategy does this. Our clients site extends to over 3.9ha, yet the Council have suggested that it only has a capacity of 20 residential units. This cannot be optimising the opportunity to develop the site at an appropriate density. Where the
density of development on strategic sites has been amended between earlier versions of the draft plan this has not been justified.

At para 4.2 the Inspector asks:

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

Prioritising greenfield Green Belt over brownfield Green Belt is not sustainable as this still leaves the need to address the brownfield sites at a later date, in accordance with paragraph 145 of the NPPF.

At para 4.3 the Inspector asks:

"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?"

If the plan fails to make adequate provision for its housing needs, by underproviding adequate housing land, as we suggest, this will require an early plan review. This may therefore require re-visiting the Green Belt boundaries at a later date, that is not an appropriate and sustainable approach.

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