Runnymede 2030 Local Plan
Public Examination
Stage 1

Response to Inspector’s Matters and Questions for Stage 1 Hearings
On behalf of Crest Nicholson
(ID: 1990)

Matter 4
Green Belt Boundaries and Exceptional Circumstances

November 2018
Runnymede 2030 Local Plan
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Barton Willmore LLP on behalf of Crest Nicholson

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INTRODUCTION

1.1 Barton Willmore LLP is instructed by Crest Nicholson (CN) and Commercial Union, General Accident and Norwich Union (CGNU) to submit this written Hearing Statement in response to the Inspector’s Matters and Questions for Stage 1 of the Runnymede 2030 Local Plan Examination. These representations expand upon the representations submitted on behalf of CN and CGNU in response to the consultations for Regulation 19 Parts 1 and 2.

1.2 CN and CGNU control the former DERA site at Longcross, Surrey, which is proposed for allocation and removal from the Green Belt in the Runnymede 2030 Local Plan under Policy SD10 (Longcross Garden Village). The site was designated by the DCLG (now Ministry of Housing, Communities and Local Government) as a Locally Led Garden Village (LLGV) in January 2017. Part of the north of the site to the north of M3 Motorway (the western edge, now referred to as ‘Longcross Park’) is designated as part of the EZ3 Enterprise Zone.
RESPONSE TO MATTER 4 - GREEN BELT BOUNDARIES AND EXCEPTIONAL CIRCUMSTANCES

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?

4.1.1 Overall, CN and CGNU support the findings of the Green Belt Review undertaken by Arup in 2014 (part 1) and 2017 (part 2) and RBC’s conclusion that Exceptional Circumstances exist to justify revising Green Belt boundaries, particularly with regard to the proposed removal of the former DERA site at Longcross from the Green Belt.

4.1.2 In response to 4.1a), the Local Plan strategy is to focus development within the existing urban areas in the Borough first and adopt a ‘brownfield first’ approach. The Local Plan supports the principle of developing appropriately located brownfield sites and making the best use of regeneration opportunities and estates renewal in the urban area. The site allocations in the Local Plan under Policies IE7 to IE11 cumulatively allocate land for c. 540 dwellings.

4.1.3 The Local Plan spatial development strategy recognises the contribution that previously developed sites in the Green Belt make to meeting housing need. However, the Runnymede SLAA (2017) identifies that there are insufficient suitable, available and achievable sites in the urban areas within the Borough to meet housing needs and RBC recognise that sites must be released from the Green Belt and allocated for housing. Indeed, there is a substantial shortfall between this source of supply and the level of housing which must be planned for within the Borough.

4.1.4 The former DERA site at Longcross is part-brownfield land and is identified as a Major Developed Site in the Green Belt in the adopted Runnymede Borough Local Plan 2001. The site should therefore be considered favourably prior to the consideration of greenfield Green Belt land being released. The former DERA is allocated for a mixed use Garden Village development under Policy SD10 and forms a significant contribution to meeting overall housing and employment need in the Borough.
4.1.5 The results of the Runnymede Site Selection Methodology and Assessment (SSMA) and Site Capacity Analysis show that the proposed site allocation at Longcross Garden Village (Policy SD10) performs either weakly or not at all against Green Belt purposes and is therefore one of the better performing previously developed sites in the Green Belt for allocation.

4.1.6 RBC’s Exceptional Circumstances document (January 2018) provides more justification at pages 18-19 as follows:

“The Council is of the opinion that it has used all reasonable endeavours to proactively search for development opportunities on brownfield land including on vacant or derelict land.”

And

“7413 dwellings are proposed to be delivered across the Plan period, of which 561 have already been completed between April 2015 and March 2017 (the great majority on brownfield and urban sites). Of the remaining 6852 dwellings that are proposed to be provided in the Borough over the period of the Local Plan, 2137 are proposed to be located in the existing Urban Area and on the existing reserve housing sites (31%).”

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?

4.1.7 The NPPF encourages planning policies and decisions to promote an effective use of land in meeting the need for homes and other uses. Although the NPPF does not set out minimum density expectations in new development it does state in paragraph 58 bullet 3 that planning policies and decisions should aim to ensure that developments optimise the potential of the site to accommodate development.

4.1.8 The effective use of all available land has been included as a policy objective in the Local Plan in policy EE1 which seeks to ensure that in both urban and Green Belt areas in the Borough:

“development proposals will be expected to achieve high quality design while making efficient use of land, taking account of their impact at the earliest opportunity.”

4.1.9 The Local Plan acknowledges that good design and making the most efficient use of land is as applicable to those areas within the Green Belt as those in its urban areas. As part
of Policy EE1, RBC seeks to support development proposals that reinforce local distinctiveness and pay particular regard to density amongst other matters.

4.1.10 As set out under 4.1a), the spatial development strategy is to focus development in the Borough’s existing urban areas in the first instance, including the regeneration schemes proposed on brownfield land in the town centres of Addlestone, Egham and Chertsey (Policies IE7-IE11). The town centres allow for higher densities of development given that they are the more sustainable locations and accessibility to sustainable transport links and services, which is reflected in the respective allocation policies. The site allocation policies and densities proposed are informed by RBC’s detailed Site Capacity Analysis (December 2017).

4.1.11 The approach in the Local Plan reflects the policy approach adopted in the revised NPPF which makes clear that development should make the most efficient use of land and avoid low densities of development where there is a shortage of land for meeting identified housing requirements (paragraph 123).

4.1.12 However, despite this, it is recognised in the Local Plan that housing needs cannot be fully accommodated within the Borough in the plan period without releasing land from the Green Belt across the Borough.

**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?**

4.1.13 The NPPF outlines at paragraph 159 that Local Planning Authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs and work with neighbouring authorities to ensure that the needs of the housing market are met.

4.1.14 RBC has outlined the steps taken to ensure effective engagement with all relevant organisations in the Duty to Cooperate Update Statement (May 2018; SD_016E) and the Duty to Cooperate Update and Compliance Statement (July 2018; SD_016F). The Statements confirm that RBC has engaged with neighbouring authorities including the preparation of a Statement of Common Ground with Spelthorne Borough Council, RBC’s HMA partner, which was published on 15th May 2018.

4.1.15 RBC have discussed with neighbouring LPAs who are unwilling to accommodate their identified need. This is unsurprising given that the neighbouring LPAs are Green Belt Authorities and similarly constrained to Runnymede in terms of their capacity to
accommodate additional growth beyond their own need. The inability to accommodate any unmet need within the neighbouring authorities further justifies the proposed release of Green Belt sites within Runnymede in order to meet the Borough’s housing need.

4.1.16 As we set out in Matter 1, RBC is not proposing to meet its full OAN, although the projected housing delivery shortfall per annum is marginal: the provision of 494 dpa proposed in the Local Plan is 4 dpa lower than the 498 set out in the SHMA Update 2018, which amounts to 60 dpa over the plan period. It seems there is little to no scope for the shortfall to be accommodated by neighbouring authorities, therefore it is reasonable to expect an early review of the Local Plan to address the unmet need. We would expect such a marginal shortfall to be addressed relatively easily through the identification of an additional site or sites.

4.1.17 The Duty to Cooperate and Compliance Statement (SD_016F) sets out RBC’s compliance with the Duty to Cooperate throughout the preparation of the Local Plan process.

4.1.18 RBC’s Exceptional Circumstances document (January 2018 and April 2018 addendum) sets out the justification behind the proposed release of sites from the Green Belt, which includes the lack of suitable, available and achievable sites in the existing urban area, the significant level of constraints to development which exist in the Borough, the housing needs faced by Runnymede over the Local Plan period and the conclusion from DtC discussions which demonstrate that any unmet housing need from Runnymede is unlikely to be met in neighbouring or nearby Local Authority areas.

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

4.2.1 Yes. We support RBC’s spatial strategy, as outlined in paragraph 19 of the Overview Document (SD_021A), to direct most new housing to the three main towns of Addlestone, Chertsey and Egham as well as the Longcross Garden Village, with the spatial strategy hierarchy as follows:

1. Most new housing, is directed to the three main towns of Addlestone, Chertsey and Egham and their surrounding suburbs.

2. Major development will also take place through the development of a garden village at Longcross

3. Significant but substantially lower levels of housing development are proposed in the Borough’s Local Centres and in the village of Thorpe. Most new retail development is earmarked to take place in Addlestone, Chertsey, Egham and Longcross.
4. Employment development is focused on the Borough’s Strategic Employment Areas, including the Longcross Enterprise Zone.

4.2.3 The proposed release of land from the Green Belt at Longcross (Policy SD10) will deliver a significant amount of employment and employment provision in the Borough and is identified as the second most important direction for growth in the overall spatial strategy.

4.2.4 The former DERA site was recognised as a sustainable location for growth through the allocation in the, now revoked, South East Plan. That is now reinforced by the designation of part of the north of the former DERA site as part of the EZ3 Enterprise Zone in recognition of its potential to deliver substantial new employment provision, as well as the designation of the whole site as a Garden Village. The Local Plan SA also concludes that the site is sustainably located and fundamental to the Local Plan Spatial Strategy in terms of becoming a focus for major residential led development and a new, sustainable mixed use settlement.

4.2.5 Additional sites proposed for Green Belt release are focused in the Borough’s existing settlements including Ottershaw, Chertsey, Addlestone, Egham and Virginia Water, reinforcing sustainable patterns of growth. The allocation of employment sites in the existing Strategic Employment Areas (SEAs) will help to build on existing sustainable patterns of development.

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?

4.3.1 No comment.

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?

4.4.1 Yes, the proposed release of land from the Green Belt through the Local Plan does take adequate account of effects on broader purposes it may serve. As we will cover in more detail as part of the Stage 2 Hearing Statements, the development of Longcross Garden Village (Policy SD10) will include provision of SANG both on site and off site at Trumps Farm (totalling more than the minimum requirement of 8ha per 1000 occupants), public...
open space throughout the site including allotments, sports pitches and on-site biodiversity enhancements. The development of the former DERA site, which is currently private land and not publicly accessible, to the public and will contain a range of housing, employment and recreational facilities and amenities for new and existing residents within the locality.