RESPONSE TO MATTER 4

REPRESENTOR ID 1998

HEARING STATEMENT
ON BEHALF OF WENTWORTH RESIDENTS ASSOCIATION

RUNNYMEDE 2030
LOCAL PLAN EXAMINATION:
STAGE 1 HEARINGS

NOVEMBER 2018

ShrimplinBrown
Planning & Development

Lion House, Oriental Road
Woking, Surrey, GU22 8AR
t: 01483 745 414/5
e: info@shrimplinbrown.com
w: www.shrimplinbrown.com
Introduction

1) This Hearing Statement has been produced by ShrimplinBrown on behalf of the Wentworth Residents Association ("WRA") (representor ID 1998) in relation to the examination into the Runnymede Borough Local Plan 2030 ("the draft Local Plan"). It responds to Matter 4 of the Stage 1 Hearing Sessions.

2) As made clear in previous objections to the Local Plan, the WRA wishes to participate at the hearing sessions where this Matter will be considered by the Inspector.

3) The WRA represents the residents living on the Wentworth Estate (being over 1,000 households) and business interests in Virginia Water in all matters affecting the Estate.

4) The WRA objects to the draft Local Plan, specifically: the failure by the Council properly to discharge its duty to co-operate; the failure by the Council properly to undertake a sustainability appraisal (and related processes) into the draft Local Plan; and three proposed housing allocations:

   - Policy SD20: Longcross Garden Village;
   - Policy SL9: Housing Allocation at Virginia Water North; and
   - Policy SL10: Housing Allocation at Virginia Water South.
**Matter 4: Green Belt Boundaries and Exceptional Circumstances (paragraphs 5.8-5.13)**

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?

5) No. The NPPF (July 2012), under which the emerging Local Plan will be examined, emphasises the need to make the most efficient use of scarce brownfield land which is one of its “Core Planning Principles”:

   “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value” (paragraph 17).

6) This is re-emphasised in the updated NPPF (July 2018) which now includes a new specific chapter on “making effective use of land”. This begins by saying:

   “Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land” (paragraph 117).

7) It explains that to achieve this planning policies should do a number of things, including:

   “c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs...;”

   “d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more
effectively…” (paragraph 118).

8) The supporting text to draft Local Plan Policy SD2 Spatial Development Strategy asserts that:

“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 Council is seeking to lead by example in this regard, positively working with private sector partners to bring forward regeneration schemes in the Borough’s town centres and through the exploration of development opportunities on its own landholdings elsewhere in the Borough. This approach has helped the Council minimise the amount of Green Belt which is to be released through the Local Plan to meet identified need.” (paragraph 5.33).

9) However, the evidence base does not support this assertion. The Strategic Land Availability Assessment (SLAA): Methodology (December 2015) does not draw specific attention to brownfield/previously developed land other than for that located in the Green Belt. It is therefore not clear that this potential source of housing supply has been fully explored.

10) The SLAA Methodology (December 2015) lists “...a number of sources that can help identify potentially available sites in the borough…”, including “Valuers department for Council-owned land”, “Redevelopment/redesign of existing residential/economic areas”, and “Register of public sector land” (paragraph 57). The explanation of the SLAA “methodology” in the Interim SLAA (June 2016) explained that “…officers contacted the Council’s head of Commercial Services to identify further land available for development.” (paragraph 6) whilst the SLAA Report (January 2018) explained that “Other sources of sites included... urban regeneration of a number of Council-owned sites (as set out as being an important source of supply in the Government’s 2017 Housing White Paper);…” (paragraph 5). However, there is no proper explanation about how this potential source of supply was investigated. Simply making contact with other Council departments does not amount to a
11) The SLAA Report (January 2018) contained a table summarising “Sources of Supply” (Appendix 1)\(^1\) which included “Council-owned land, including estates regeneration. Redevelopment/redesign of existing residential/economic areas” and suggested 729 dwellings (11% of the total of 6,377 dwellings) could be delivered. However, it is not made clear where these dwellings come from so it is not possible to understand whether this source of development could deliver more housing.

12) There is therefore no evidence that the Plan’s strategy makes 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?

13) No. The NPPF (March 2012) makes clear that in the context of design policies they should, amongst other things:

   “optimise the potential of the site to accommodate development...” (paragraph 58).

14) The Housing White Paper (2017) signalled the Government’s intention that the revised NPPF would:

   • “make efficient use of land and avoid building homes at low densities” where there is a shortage of land for meeting identified housing requirements;

   • address the particular scope for higher-density housing in urban locations that are well served by public transport (such as around many railway stations); that provide scope to replace or build over low-density uses (such as retail warehouses, lock-ups and car parks); or where buildings can be extended upwards by using the ‘airspace’ above them;

\(^1\) The Interim SLAA (June 2016) did not explain the potential of this source of supply.
• ensure that the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs; and

• take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives in particular circumstances; for example, avoiding a rigid application of open space standards if there is adequate provision in the wider area.” (paragraph 1.53, original emphasis).

15) This policy framework informed the Council’s Site Capacity Analysis: Final Version (December 2017).

16) The recommendations of the House White Paper were taken forward in the NPPF (July 2018) which begins by explaining that “Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)” (paragraph 8). These include “making effective use of land” (note that this is not limited to brownfield land):

“an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.” (paragraph 8(c), emphasis added).

17) The NPPF (July 2018) now includes a new specific chapter on “making effective use of land” (note that this is not limited to brownfield land). This begins by saying:

“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.” (paragraph 117).
18) The NPPF then goes on to state that decisions on planning applications should do a number of things including:

“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;” (paragraph 118(c)).

19) Of the 18 proposed allocations, only three (17%) are at a density of 40 or more dwellings per hectare (dph); five (28%) at 30 or more dph; six (33%) at 20 or more dph; three (17%) at 10 or more dph; whilst one, Virginia Water North, is only 6dph and the land promoter is suggesting fewer dwellings (see Appendix 1).

20) The flawed approach to assessing appropriate density is witnessed by the fact that St Peter’s Hospital, Chertsey is proposed to be allocated under Policy SL13 for 400 net additional has subsequently had an application submitted on it that is supported by officers for 475 dwellings\(^2\), a 20% increase (application reference RU.17-1815, reported to committee on 7 March 2018 and 24 October 2018).

21) Moreover, given that given that Green Belt land should only be released in exceptional circumstances it is even more imperative that any such release(s) maximises the efficient use of land. The Plan palpably fails to do so. This undermines the overall basis of the Council’s approach to Green Belt release.

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?

22) No. See response to Matter 1, Question 1.4.

\(^2\) 212 dwellings + 116 retirement apartments + 138 key worker dwellings + 9 general needs affordable dwellings = 475 units overall.
4.2 Having regard to the proposed releases of land from the Green Belt, does the Plan promote sustainable patterns of development?

23) No. The Green Belt Review: Methodology and Assessment (December 2014) makes clear in its conclusions that it is not intended to allocate sites but that it should feed into a wider strategy:

“It is important to note that the conclusions reached in this study do not automatically result in the release of this land from the Green Belt; and that further decision making by the Council in developing the Local Plan will determine, which, if any, might be released from the Green Belt. It is recommended that these Resultant Land Parcels are considered as part of the wider work undertaken by the Council to identify key housing and employment sites and land and tested through the Sustainability Appraisal process, as part of a robust approach to develop the future development strategy for Runnymede.” (paragraph 9.1.5, emphasis added).

24) The introduction to the subsequent Green Belt Review Part 2 (March 2017) similarly makes clear that:

“The outcome of this process was the identification of a number of resultant land parcels, forming areas which the Council could consider for release from the Green Belt, if such an approach was necessary and justified as part of the wider Local Plan spatial strategy, and could be justified through the demonstration of exceptional circumstances.” (paragraph 1.1.3, emphasis added).

25) Regrettably, the Council failed to heed this advice to put in place a wider spatial strategy. Instead the Council’s non-strategic approach is driven by site specific considerations, which is directly contrary to the approach that the evidence base itself says should be taken. As a result development is directed towards unsustainable location such as Longcross and Virginia Water.
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?

26) 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?

27) No. There is no proper assessment of impact on the landscape. See response to Matter 3, Question 3.1(c).
Appendix 1
<table>
<thead>
<tr>
<th>Policy</th>
<th>Area</th>
<th>Regulation 19 consultation (January 2018)</th>
<th>Dwellings per hectare</th>
<th>Regulation 19 consultation (May 2018)</th>
<th>Dwellings per hectare</th>
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<tbody>
<tr>
<td>SD10</td>
<td>137ha</td>
<td>1700 dwellings</td>
<td>12.41</td>
<td>1700 dwellings</td>
<td>12.41</td>
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<td>SL2</td>
<td>1.4ha</td>
<td>40 dwellings</td>
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<td>SL3</td>
<td>7.67ha</td>
<td>325 dwellings (130 under construction + 195 additional)</td>
<td>42.37</td>
<td>340 dwellings (130 under construction + 210 additional)</td>
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<td>SL4</td>
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<td>SL5</td>
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<td>100 dwellings</td>
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<td>6.8ha</td>
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<td>250 dwellings + 3 traveller pitches</td>
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<td>SL9</td>
<td>19.5ha</td>
<td>120 dwellings (86 – Merlewood, 34 – rest of site)</td>
<td>6.15</td>
<td>120 dwellings (86 – Merlewood, 34 – rest of site)</td>
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<td>SL10</td>
<td>5.27ha</td>
<td>150 dwellings + 2 traveller pitches</td>
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