Runnymede Borough Council Local Plan (2030)

Examination Statement – Matter 4 Green Belt Boundaries and Exceptional Circumstances

Prepared on Behalf of Fairoaks Garden Village Ltd

November 2018
Contents

1. Introduction .................................................. 3
2. Matter 4: Green Belt Boundaries and Exceptional Circumstances .......... 4
3. Conclusions .................................................. 7

Appendices .................................................. 8
Appendix 1 – Land Use Parameter Plan (July 2018) ......................... 9
1. Introduction

1.1. This Examination Statement is submitted on behalf of Fairoaks Garden Village Ltd (FGVL) in response to the Inspector’s questions in relation to the Runnymede Borough Council (“RBC”) Local Plan 2030. The Statement relates to a proposed new settlement located on the border of Surrey Heath Borough Council (SHBC) and RBC.

1.2. This follows representations submitted in June 2018 on the Regulation 19 of the Local Plan (2030). FGVL representations addressed the soundness of the Local Plan, notably whether a positively planned approach to the provision of Suitable Alternative Natural Greenspace (SANG) and with respect of the Green Belt generally has been made. The position of FGVL is not to oppose the Local Plan per se, rather to ensure that it is adequately robust to respond to the changing circumstance of a potential planning approval at Fairoaks Garden Village, and the likely positive benefits this has for RBC.

1.3. The planning case for the delivery of a new settlement now is predicated on the basis of the NPPF Revision ‘very special circumstances’ for development of a predominantly brownfield site in the Green Belt.

1.4. A planning application was submitted to SHBC and RBC and was validated by the Councils on 5th October 2018 (SHBC reference 18/0642 and RBC reference RU.18/1615). The position of FGVL as outlined in the application and supporting plans (notably parameter plans), is that no built development is proposed in RBC. The proposal for RBC is SANG/ open spaces (with associated infrastructure), and off-site infrastructure contributions as required. An Illustrative Masterplan is included in Appendix 1 of the 2018 representations, as updated during the formulation of planning application process (Appendix 1 of this Statement includes the updated Land Use Parameter Plan).

1.5. This statement concerns Matter 4: Overall Spatial Strategy, which ‘considers whether, at a high level, there are exceptional circumstances to redefine Green Belt boundaries through the Plan. At a detailed level, the justification for the proposed site allocations in the Green Belt, as well as other changes to its boundaries, will be considered at the Stage 2 hearings’.
2. 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

2.1. Indirectly, the Plan can assist with the use of a major and suitable brownfield site in SHBC through recognition of the positive benefits arising from the delivery of FGV.

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?

2.2. FGVL has no comment to make in respect of this question.

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?

2.3. FGVL makes no case of any failure of the Duty to Cooperate on the part of either SHBC or RBC. The relevant Duty to Cooperate Statement may well need to be updated as part of the Examination to reflect the ongoing planning application determination of FGV.

2.4. It is clear that the Plan can go further to be both robust (justified) and positively prepared by including a positive approach to Green Infrastructure and Suitable Alternative Natural Greenspace (SANG). This would ensure a more resilient plan, able to respond to changing circumstances should either a) planning approval be granted for FGV, or b) alternatively SHBC propose the allocation of FGV through their emerging Local Plan, the Regulation 18 version of which is due Summer 2019.
Examination Statement – Matter 4 Green Belt Boundaries and Exceptional Circumstances
Runnymede 2030 Draft Local Plan

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

2.5. FGVL position is not to seek further review or amendments to the Green Belt boundaries. FGVL therefore has no comment to make in respect of this question.

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?

2.6. FGVL position is not to seek further review or amendments to the Green Belt boundaries. FGVL therefore has no comment to make in respect of this question.
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?

2.7. The position of FGVL is for FGV to be recognised in the Plan.

2.8. This can be achieved though recognition of the contribution SANGs can make as suitable Green Infrastructure in the Green Belt. No amendment to the Green Belt would be required, nor would the delivery of SANG be specifically reliant on the delivery of FGV per se, as there is still a circumstance whereby this infrastructure is provided to solely meet the wider development needs of the Borough. Clearly, the delivery of FGV would provide one mechanism to enable the SANGs. The SANGs equate to a land area of circa 53 hectares. SANGs are clearly compatible uses in the Green Belt.

2.9. The NPPF paragraph 81 requires that local planning authorities to plan positively to enhance the beneficial use of the Green Belt. The land will clearly provide recreational benefit (and sports), on land which is presently private and not public. Access to the Countryside would be substantially enhanced, with the creation of two country parks providing over 5 miles of public tracks, trails and paths. In total FGV would provide circa 53ha of SANG, largely within RBC, along with 12.5ha for a biodiversity area and over 20ha of public open space.

2.10. Land at Fairoaks should therefore be specifically safeguarded as SANG in policy EE10 with reference made to a key Biodiversity Opportunity Area in policy EE11 and on the Proposals Map. This will help ensure RBC plans positively for the benefits associated with FGV and the Green Belt in this location.
3. Conclusions

3.1. FGVL respectfully requests that Main Modifications are made to the Plan, as summarised in Appendix 2 of FGVL representations.
Appendices
Appendix 1 – Land Use Parameter Plan (July 2018)
Examination Statement – Matter 4 Green Belt Boundaries and Exceptional Circumstances

Runnymede 2030 Draft Local Plan

Katherine Munro
Associate Director

+44 (0) 1732 789 712
+44 (0) 7870 987 955
Katherine.munro@savills.com