Further Statement on Behalf of CEMEX Plc (ID1217) and Blackfield Land (ID1986)

Response to Inspector’s Matters Stage 1
Matters 2.1(c), 2.3, 3.1(a), 4.3 and 4.4:

The role of settlements, effect of Heathrow expansion and the need for additional flexibility now in defining settlement boundaries (and by definition the review of the Green Belt); how should unmet needs be addressed?

1.1 The Council has accepted the need to review the Green Belt in order to address the identified OAN (see paragraph 5.10 of the Submitted Runnymede Local Plan (RLP)), albeit in part. Others will no doubt submit evidence as to the OAN and the plan period, including the relationship with Spelthorne. The Council had no up to date plan for a very long time and with that have failed to address housing needs in Runnymede. Despite the clear instruction in NPPF 2012 to boost significantly the supply of housing.

1.2 The Council’s statement on Exceptional Circumstances accepts the need to review, usefully setting out the history of the Green Belt and confirming that the Green Belt in Runnymede was designated at a time when the pressures for housing and the role and function of the Green Belt was different. The acceptance of the need to review is welcomed albeit our representations on behalf of Cemex are that, inter alia, the Council should go further. We have submitted representations identifying the role of Thorpe and the contribution that a wider release, to provide for housing above the limited level proposed in the RLP, can make in not only meeting local needs (housing but also local facilities and services) but also contributing to the functions of the Green Belt, sport and recreation and public access in particular.

1.3 The challenge for the Council in accepting the need to release land from the Green Belt is how far that release should go and where the revised boundaries should be set. In setting the revised boundaries, we would suggest that the advice at paragraph 84 and 85 of the NPPF (2012) come into play. In short, that the revised boundaries should be set to endure well beyond the plan period, especially as the plan period of the RLP is truncated to 2030. If exceptional circumstances exist now to warrant the review of the Green Belt in terms of OAN, then it is highly likely that similar circumstances will apply at the point of the review of the Local Plan once it is adopted, which by implication, would render the proposed Green Belt boundaries contrary to the advice at para 83 of the NPPF. This is particularly pertinent as the Council appears to be promoting a policy commitment to a short-term review.

1.4 The response ought to be to redefine the Green Belt now to provide flexibility. This can include safeguarded sites but also countryside, beyond the settlement boundary but not Green Belt. Neighbourhood Plans can play an important role in identifying the role of development in meeting Borough wide and more local needs.

1.5 Coupled with remedying any discrepancies in the Green Belt Review and review of the OAN that the Inspector may find necessary, then such modification to the plan as submitted can be secured we would suggest through Main Modifications. This would allow for consultation and testing through SEA/SA update as well publication of the revised evidence base.
1.6 The Inspector has also raised the issue of how the submitted plan addresses further changes, such as Heathrow.

1.7 The Inspector examining the Aylesbury Vale Local Plan has recently published his interim findings. At paragraph 7 he states:

"Predictable events should be planned for. Both Heathrow expansion and the Oxford-Cambridge Expressway are predictable, known event.....To be sound, the VALP should make contingency plans to accommodate them, not simply abandon its function to a future review of uncertain timescale”.

1.8 We understand that the Inspector examining the Wycombe DC local plan has requested a note on this matter. The expansion of Heathrow represents a major step change event for Runnymede. The proximity to Heathrow is cited as a strength (see paragraph 4.1 of the RLP). The Council is a member of the Heathrow Spatial Planning Group (HSPG). This is welcomed. Whilst the environmental effects of expansion will need to be identified and mitigated, the reported minutes of the Council appear silent on how the economic benefits and opportunities that will arise from expansion and the related infrastructure interventions, such as the southern rail access, will be captured and how that needs to be addressed in the Local Plan (see 5.45 of the RLP). The plan confirms the Council’s objection to expansion of Heathrow but we would suggest that the RLP is silent as how the opportunity presented by expansion will be positively planned for.

1.9 Accordingly, the plan has not been positively prepared. Again, we would suggest that approach should be to review the spatial strategy to reflect or accommodate the opportunity presented by Heathrow expansion and related transport interventions through main modifications. This points to the need for greater flexibility in the allocation of land and the need to build in greater capacity to accommodate economic growth and an increase in housing requirement, which could be secured through a more holistic approach to the review of the Green Belt.

BARTON WILLMORE
2 November 2018