Sequence of Events and Timing of Tender Brief for the Runnymede Stage 1 Green Belt Review

1.1 Following issues raised during the Stage 1 Runnymede Local Plan EiP hearing sessions the Inspector, Mary Travers has requested that the Council set out the sequence of events for tendering of the Stage 1 Green Belt Review (SD_004L to P) with a history and timing of the brief. Table 1-1 below sets out the sequence of events that led to the Brief and the appointment of Arup to carry out the Stage 1 Review as independent consultants.

1.2 Any documentation referred to in Table 1-1 have been attached as appendices where indicated.

Table 1-1: Sequence of Events for Tendering of the Runnymede Stage 1 Green Belt Review

<table>
<thead>
<tr>
<th>Stage</th>
<th>Event Details</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Plan Member’s Working Group</td>
<td>Item 3 recognises that a contingency in the Core Strategy is required to counter potential delays with the former DERA site or other shortfalls of supply. Clarification that GB Review is not required to allow for Core Strategy proposals aside from DERA and in the case of a shortfall, existing reserve sites (minutes of meeting attached as Appendix 1).</td>
<td>28.05.2013</td>
</tr>
<tr>
<td>Local Plan Member’s Working Group</td>
<td>Item 5 agrees to the contingency in Local Plan Core Strategy 2013-3028 (LPCS) Policies LP01 &amp; LP02 to make reference to a Green Belt Review to take place during the latter part of the plan if there is a significant shortfall of housing supply (minutes of meeting attached as Appendix 2).</td>
<td>03.06.2013</td>
</tr>
<tr>
<td>Submission of Runnymede Core Strategy 2013-2028</td>
<td>Submission of the (withdrawn) Runnymede LPCS to the Secretary of State and accompanying evidence base including a Housing Context Technical Paper (HCTP). P18 of the HCTP makes reference to having reviewed Runnymede’s Green Belt boundary and Para 6.58 of the HCTP sets out that the Council has ‘undertaken to carry out a Borough wide Green Belt boundary survey’ (underlined for emphasis). Core Strategy made provision for 3,300 new homes including the former DERA site at Longcross. Submission Plan included Policy LP01 which contained a contingency for Green Belt Review and Policy LP08 which allocated the former DERA site (Policies LP01 &amp; LP08 attached at Appendix 3).</td>
<td>20.01.2014</td>
</tr>
<tr>
<td>Note ID/1 from Inspector David Hogger to RBC (Attached as Appendix 4)</td>
<td>Note issued by the Inspector David Hogger querying the availability of a Green Belt Review in the Council’s evidence base.</td>
<td>04.02.2014</td>
</tr>
<tr>
<td>Response RBC/1 from RBC to</td>
<td>Response from RBC clarifies that the GB Review referred to on p18 of the</td>
<td>06.02.2014</td>
</tr>
<tr>
<td>Date</td>
<td>Event Description</td>
<td></td>
</tr>
<tr>
<td>--------------</td>
<td>-----------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>12.03.2014</td>
<td>Advert for GB Tender - Advert for GB Review Tender sent for publication by email</td>
<td></td>
</tr>
<tr>
<td>18.03.2014</td>
<td>Response RBC/16 from RBC to Inspector’s MIQ’s - Response to question 1(f) sets out</td>
<td></td>
</tr>
<tr>
<td></td>
<td>the Council’s position regarding Green Belt and release of the former DERA site</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Longcross.</td>
<td></td>
</tr>
<tr>
<td>03.04.2014</td>
<td>RBC Finalise GB Review Tender Documentation (Attached as Appendix 8) - Tender</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Brief for Green Belt Review finalised. Paragraph 1.3 of the Brief sets out the</td>
<td></td>
</tr>
<tr>
<td></td>
<td>strategy of the LPCS including the proposal for a new community at Longcross.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Para 1.4 sets out the position of LPCS Policy LP01 with respect to a contingency</td>
<td></td>
</tr>
<tr>
<td></td>
<td>should a 5 year housing land supply and focusses on release of housing reserve</td>
<td></td>
</tr>
<tr>
<td></td>
<td>sites from the 2001 Local Plan or in the case of serious shortfalls a borough</td>
<td></td>
</tr>
<tr>
<td></td>
<td>wide Green Belt boundary survey. Para 1.4 states that the review would form the</td>
<td></td>
</tr>
<tr>
<td></td>
<td>initial phase of the survey to identify broad areas which could potentially be</td>
<td></td>
</tr>
<tr>
<td></td>
<td>removed from the Green Belt to provide housing. Para 4.2 also states that to have</td>
<td></td>
</tr>
<tr>
<td></td>
<td>a defensible boundary the Council should demonstrate it has considered all</td>
<td></td>
</tr>
<tr>
<td></td>
<td>potential options and areas as part of the review. Para 5.1 set out the project</td>
<td></td>
</tr>
<tr>
<td></td>
<td>requirements including in the third bullet to appraise all areas at a strategic</td>
<td></td>
</tr>
<tr>
<td></td>
<td>level and expected the entire Green Belt to be appraised with Green Belt purposes</td>
<td></td>
</tr>
<tr>
<td></td>
<td>and LPCS in mind. Bullet 4 requires comprehensive assessment of all potential</td>
<td></td>
</tr>
<tr>
<td></td>
<td>areas and their contribution to Green Belt purposes.</td>
<td></td>
</tr>
<tr>
<td>09.04.2014</td>
<td>Runnymede Core Strategy preliminary hearing session - Preliminary hearing session</td>
<td></td>
</tr>
<tr>
<td></td>
<td>of LPCS to discuss DtC and approach to housing delivery.</td>
<td></td>
</tr>
<tr>
<td>29.04.2014</td>
<td>Inspector David Hogger’s Conclusions (ID/10) on Runnymede LPCS 2013-2028 -</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Inspector’s conclusions outlining that the LPCS should be withdrawn for a number</td>
<td></td>
</tr>
<tr>
<td></td>
<td>of reasons. In paragraph 40 the Inspector recognises that Runnymede is</td>
<td></td>
</tr>
<tr>
<td></td>
<td>commissioning a Borough-wide Green Belt Review. (Inspector’s conclusions attached</td>
<td></td>
</tr>
<tr>
<td></td>
<td>at Appendix 9).</td>
<td></td>
</tr>
<tr>
<td>21.05.2014</td>
<td>Appointment of Arup as consultants - Arup appointed by RBC to undertake Green</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Belt Review.</td>
<td></td>
</tr>
<tr>
<td>12.06.2014</td>
<td>Email from Arup to RBC - Email outlining ‘Phase 1’ Review for testing general</td>
<td></td>
</tr>
<tr>
<td></td>
<td>areas in the Stage 1 Green Belt Review. Stage d. Confirms that the review will</td>
<td></td>
</tr>
<tr>
<td></td>
<td>be based on the existing Green Belt boundary (Appendix 10)</td>
<td></td>
</tr>
<tr>
<td>16.07.2014</td>
<td>Planning Committee Meeting - Agenda item 7 sets out Local Plan progress and</td>
<td></td>
</tr>
<tr>
<td></td>
<td>paragraph 3.1 identifies that the Council has appointed Arup to carry out a</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Borough-wide GB Review.</td>
<td></td>
</tr>
<tr>
<td>Date</td>
<td>Event Description</td>
<td></td>
</tr>
<tr>
<td>--------------</td>
<td>------------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>25.07.2014</td>
<td>Notice of withdrawal of the LPCS (Attached at Appendix 11)</td>
<td></td>
</tr>
<tr>
<td>30.07.2014</td>
<td>Draft methodology and Phase 1 Assessment issued by Arup to RBC. Section 3.2.2 (p9) references Inspector Hogger's conclusions on the LPCS and the need for a clear justification for release of the former DERA site and need for a Borough-wide GB Review. Section 3.2.3 (p10) has regard to the intention for a new Local Plan and confirms that the GB Review will form part of the evidence. Section 5.1 1st bullet sets out that Phase 1 of the Review assessed the entirety of the GB in Runnymede. Figure 5.5 also clearly identifies the extent of GB appraised with Longcross shown in the Green Belt.</td>
<td></td>
</tr>
<tr>
<td>29.09.2014</td>
<td>Draft Stage 1 Green Belt Review issued by Arup to RBC. Sections 3.2.2 and 3.2.3 reference Inspector Hogger’s conclusions and the new Local Plan. Section 5.2 1st and 2nd paragraphs confirm that all land in the Green Belt forms part of the Review.</td>
<td></td>
</tr>
<tr>
<td>16.12.2014</td>
<td>Final Stage 1 GB Review (SD_004L to P) issued by Arup to RBC. Para 1.1.2 states that Green Belt Review provides an independent and objective appraisal of all land outside of the Runnymede urban area which includes the entirety of the Green Belt. Para 3.2.8 recognises Longcross as a linear settlement with no centre. Para 3.3.11 to 3.3.13 continue to echo Inspector Hogger’s conclusions and that the Council is progressing a new Local Plan.</td>
<td></td>
</tr>
</tbody>
</table>

**General Commentary**

1.3 As can be seen from the timeline of events set out in Table 1-1, the decision to undertake a Green Belt Review in 2014 was driven by a recognition that the Runnymede LPCS, which was submitted and later withdrawn in 2014, required a contingency to maintain housing land supply. The contingency focussed on a Borough wide Green Belt Review. This train of thinking was set in motion prior to submission of the LPCS in January 2014 and eventually expressed in Policy LP01 of the submitted LPCS with the former DERA site, Longcross allocated in Policy LP08.

1.4 The Green Belt Review required under Policy LP01 of the LPCS led the Council to prepare and advertise a tender for the Green Belt Review following submission of the LPCS but prior to its preliminary hearing held on the 9th April 2014 by Inspector David Hogger. As such, given that at the time of tender preparation the Council had submitted what it considered to be a sound LPCS, the Green Belt Review tender documentation was drawn up and advertised in this context.
1.5 Following Inspector David Hogger’s conclusions of the 29th April 2014, the Council appointed Arup as consultants on 21st May 2014 to carry out a Green Belt Review. This was prior to the Council formally withdrawing the LPCS, although from the point of receiving the Inspector’s conclusions the tone of what would be required from a Green Belt Review changed as can be seen in the draft and final Stage 1 Green Belt Review Reports.

1.6 Arup’s draft Green Belt Review Methodology and Phase 1 Assessment and subsequent draft and final reports clearly reference Inspector Hogger’s conclusions on the LPCS and the need for a Borough-wide Green Belt Review. It can be clearly seen in the drafts and final version of the Stage 1 Green Belt Review that it is the whole of the Green Belt in Runnymede which was reviewed and no area was either omitted or pre-determined.

1.7 The tender documentation did not therefore pre-determine the allocation of the former DERA site in the Runnymede 2030 Local Plan but was simply stating the known facts at the time of tender preparation; that the submitted LPCS allocated the former DERA site and was considered sound by the Council at that time. Once Inspector Hogger’s conclusions on the LPCS had been received it is clear that the Green Belt Review had regard to the Inspector’s conclusions and undertook an independent Borough-wide review of the whole of the Green Belt from its initial stages through to final Stage 1 Report (SD_004L to P).

1.8 Leading on from this, the timeline clearly indicates that the decision to take Longcross Garden Village out of the Green Belt after the LPCS was withdrawn was not pre-determined by its earlier allocation in the LPCS, but was looked at afresh both in terms of:

1) Contribution to the Green Belt; and
2) Input of the Stage 1 Green Belt Review and performance against all other sites as assessed in the SSMA.
Appendix 1

Notes of meeting: Local Plan Members’ Working Group. 28th May 2013

Present: Ian Maguire (IM), Richard Ford (RF), Georgina Pacey (GP), Jane Peberdy (JP), Babatunde Adebutu (BA), Cheryl Brown (CB), Cllr Geoff Woodger (GW), Cllr Gail Kingerley (GK), Cllr John Edwards (JE).

1-Local Plan Core Strategy (LPCS) Public Consultation.
RF provided a brief overview of the number and types of responses received.

2-Objectively assessed housing needs.
-IM and RF outlined the experience that other Councils were having at the moment at EiP- in regard to objectively assessed housing needs (East Hampshire, Denby, North Warwickshire, Norfolk etc). The time has ended that Inspectors are giving Authorities the ‘benefit of the doubt’ and are expecting Councils to be able to clearly demonstrate what their objectively assessed housing need is, based on the most up to date evidence available. However, at the recent EiPs, 2008 data was tested and was not considered robust.
-GP advised that RBC has commissioned Cambridge Econometrics to carry out demographic profiling based on the Chelmer model to assist officers in reassessing what our objectively assessed housing need is. For information, the Chelmer Population and Housing Model (Chelmer Model) is a well-established demographic model which provides detailed demographic and housing projections for areas of interest.

Importantly, it provides
- independent projections that do not rely on other commercial forecasts
- the ability to run alternative ‘what if’ scenarios
- a systemic, rigorous and transparent method so that results are easily traced back to assumptions
- considerable disaggregation (eg age bands, household types etc)
-GW raised that the student population in the Borough needs to be factored into any work on objectively assessed housing needs, in particular given its effect on housing supply in the Borough. Officers advised that the Borough’s institutional population is something that will be considered in this work.
-There was a general agreement in the group that the minimum number of units we need to come forward annually is likely to go up from 161 dpa. IM advised that a balance may have to be struck between the identified need from the demographic profiling and past delivery/land availability in the Borough. Officers advised that they hoped to have further information on this issue at next week’s MWG meeting.

3-Reserve sites/Thorpe.
-Officers are currently reviewing the housing capacity of the 6 reserved sites in the Borough.
-It was agreed that it is sensible to introduce a clearer contingency into the LPCS to deal with potential delays to the delivery of dwellings on the DERA site, or to deal with other shortfalls in supply generally. Officers clarified that a Green Belt Review is not required at the current RBCLP_14
time to allow for the Core Strategy proposals to be delivered (apart from the alteration to the Green Belt boundary to remove the DERA site from the Green Belt), and in the event of a potential shortfall, reserved sites would be looked at in the first instance.

-Wording will be incorporated in to the LPCS in this regard and sent to Members in advance of next week’s MWG meeting for comment.

4-Biodiversity.
-There was agreement that the addition of a policy relating to biodiversity should be included in the LPCS. This responds to representations of the National Trust, the Environment Agency and Natural England in particular. CB is working on this policy at the moment. The policy, in draft form will be circulated to Members prior to next week’s MWG meeting for comment.

5-Elderly people’s accommodation.
-RF advised that there had been 8 representations made during the recent consultation which commented on the weakness of the Plan in tackling the issue of how the Council is going to meet the challenges that result from a growing elderly population.
-GP advised that these concerns had been taken on board and the references to the aging population strengthened in the Plan and some additional wording added into policy LP02. This additional content will be circulated to Members in advance of next week’s PWG meeting.
-IM advised there was no data that could say with certainty the number of houses that would need to be delivered for the elderly, and was not appropriate to be included in the LPCS.

6-Gypsies and Travellers.
-GP advised that in order to better reflect the contents of the Planning Policy for Traveller Sites (PPTS), Policy SP03: Gypsies, Travellers and Travelling Showpeople had been amended to make it clear at the strategic level how the Council would deal with the issue of allocations for traveller sites; prioritising sustainable urban sites. Further detail would follow in any Gypsy and Traveller Sites Development Plan Document (DPD). The amended policy will be circulated to Members in advance of next week’s MWG meeting for comment.
-GW asked about the Council’s interim approach for dealing with applications for traveller pitches. GP advised that even though the Council’ interim strategy states that demand has been met up to 2016, this is no longer enough to meet with the requirements of the PPTS which states that Councils are required to demonstrate a 5 year rolling supply of traveller sites. As such, the interim approach may need to be reviewed and temporary consents considered until any required sites have come forward through the DPD process. Members would be updated on this at a later date.

7-Flooding.
-GP advised that a lengthy representation had been received from the Environment Agency raising concern that the Council had not properly evidenced that the issue of flooding had been properly addressed in the LPCS, and in particular in formulating the housing strategy.
-GP advised that a positive meeting had taken place between the Environment Agency and officers, and officers were clear of the changes to the document that were required. Officers continue to work with the Environment Agency, Surrey County Council (in their capacity as the Local Lead Flood Authority) and the Council’s drainage team to resolve the issues that have been raised. Whilst work is progressing however, it is unlikely that the amended wording in the Plan in this area will have been completed by the next MWG meeting.
- GP also advised the Strategic Flood Risk Assessment is being revised with the drainage department and the EA.

8. AOB.
- GW asked what would be considered in next week’s MWG meeting. It was agreed that Members would be asked to consider the following in draft form:
  - new biodiversity policy (SP11)
  - the amended Gypsy and Traveller policy (SP03)
  - the strengthened references in the Plan to the elderly population and the amended wording in LP02 to address the concerns raised in the recent consultation.
  - the location, and suggested wording for the contingency to carry out a Green Belt review if the DERA site is delayed in coming forward for housing, or if there are other problems with supply.
  - An update on what the objectively assessed housing need for the Borough is likely to be.
Notes of meeting: Local Plan Members’ Working Group. 3rd June 2013

Present: Ian Maguire (IM), Richard Ford (RF), Georgina Pacey (GP), Cheryl Brown (CB), Cllr Geoff Woodger (GW), Cllr Gail Kingerley (GK), Cllr John Edwards (JE), Cllr Derek Cotty (DC)

1. Notes of last meeting
RF drew the Group’s attention to the minutes from the meeting of 28th May. No suggestions were made for any alterations.

2. Amended Gypsy and Traveller Policy (SP03)
GP outlined in brief the changes that had been made to policy SP03. Apart from a couple of very minor changes to the wording and grammar, Members were satisfied with the amended policy as presented. Members will be able to view the policy again at the MWG meeting of 1st July if required.

3. New biodiversity policy (SP11)
CB gave Members an overview of the new biodiversity policy that had been drafted. Members were largely satisfied with the content of the background text and the policy itself subject to some minor spelling and grammar corrections. It was agreed that Officers would also look at introducing better signposting into the text to the background documents referred to. It was agreed that officers would make tweaks to the policy in line with the discussion of the group. Members will be able to view the policy again at the MWG meeting of 1st July.

4. Elderly population (LP02)
Members were satisfied with the wording incorporated into policy LP02 to clarify that the Council will provide housing for elderly people and vulnerable groups where there is an identified need. GP confirmed that further references to the ageing population would be made in the earlier chapters of the LPCS. Members will be able to comment on these additional changes at the MWG meeting of 1st July.

GW asked if policy LP02 could contain more information about the reserved housing sites in the Borough. IM advised that more detailed information was included in the SHLAA although it was agreed that officers would look at introducing better signposting in the text to the relevant background documents.

5. Contingency for housing under delivery (policies LP01 and LP02)
RF clarified what the amended contingency for polices LP01 and LP02 would be, making reference to the fact that a Green Belt review may need to take place during the latter part of the plan period if there is a significant shortfall in supply. It was agreed that the wording was acceptable.

6. Flooding (SP10)
GP advised that she was still working with the Environment Agency and the Council’s Drainage team in the following areas:

- Introducing a hook in the LPCS to allow for detailed flood management and design guidance to be produced in an SPD when work on the DM DPD is underway to ensure that flood risk in the Borough’s most vulnerable areas is addressed and further guidance is made available to agents and applicants.
- Further explanation will be given in the LPCS as to how flooding has been addressed by the Council in the preparation of the LPCS to date, during the formulation of the housing strategy in particular.
- The evidence base (the Strategic Flood Risk Assessment) is being updated to take into account more recent hazard mapping, and other flooding modelling which is available.
- Some additions may be made to policy SP10 (the flooding policy in the LPCS) to make the policy more ‘locally relevant’. Discussions continue with the Council’s Drainage team to formulate appropriate wording.

GP advised that she hoped to have the work required under bullet points 1, 2 and 4 completed by the next MWG meeting.

7. **Objectively assessed housing needs**
IM advised that work was continuing in this area of work and officers were still reviewing the work produced by Cambridge Econometrics. Members would be updated at the next MWG meeting.

8. **AOB**
No issues raised.

9. **Date of next meeting**
Dates for the MWG meetings were agreed as follows:
Monday 24th June, 2pm, Member’s Room
Monday 1st July, 2pm, Member’s Room
Appendix 3

Runnymede Local Plan Core Strategy 2013-2028 Policies LP01 & LP08

LP01: Strategy for the Location of Sustainable Development

The Borough Council will ensure that all new development is delivered in accordance with a sustainable spatial strategy, as set out in this Plan.

New development will be directed towards previously developed land within the existing urban areas, to the former DERA site at Longcross, and to the main London Road campus of Royal Holloway University of London to help meet the growth aspirations of the University. Full consideration will be given to the impact of development on the local and strategic transport network, on flood risk, and to the potential impact of residential development on the Thames Basin Heaths Special Protection Area. Proposals will make appropriate provision for affordable housing. Where relevant, consideration will be given to any effect of development on protected species and habitats, and on open space and recreational facilities. Other considerations will be taken into account as appropriate.

The strategy will set the context for neighbourhood planning and development orders.

The location and scale of development proposals will need to take full and proper account of the existing role and characteristics of settlements. All development proposals will need to make the best use of the land available. Runnymede’s settlements have been classified as follows:

Addlestone, Chertsey, and Egham are the main urban settlements in the Borough and represent the most sustainable locations, in terms of accessibility, existing services and facilities, and transport, for additional development.

Other urban settlements are generally more residential in character and consequently have fewer services to support any potential large areas of development, but do have some
capacity to absorb development satisfactorily. These settlements are Virginia Water, Woodham, Englefield Green, New Haw, Row Town, Ottershaw, and Thorpe Village.

The former DERA site will provide the focus for a new mixed use development in the west of the Borough, to include both residential and commercial development with supporting infrastructure.

Within the urban settlements, the focus of development will continue to be the existing defined town centres (identified on the proposals map), where services are provided in accessible and attractive environments. The spatial strategy takes account of each centre’s particular character and scale as follows:

Hierarchy: Town Centre: Addlestone, Chertsey, Egham Role: Development of appropriate scale and quality will be permitted where it supports, regenerates and enhances the role of these centres as the main retail, business, social and cultural destinations in the Borough.

Hierarchy: Local Centre Englefield Green, Virginia Water, Thorpe, New Haw, Woodham and Ottershaw. Role: Development will be permitted that supports the role of the centres in providing local services and community facilities as appropriate.

Hierarchy: Local Shops Location: Throughout the Borough and outside the named centres above, Role: There will be a presumption against the loss of retail shops, particularly in the smaller local centres, where they serve a local need and form an important local community facility.

Hierarchy: New Village Centre Former DERA site Role: The role of this centre will be to support the daily needs of the population and workers created by the development, but not act as a retail destination. The development will have its own distinct community centre where a variety of supporting facilities will be provided.

Hierarchy: Campus Development Location: Royal Holloway University of London Role: The College, with a focus on the main campus, is an important contributor to the local economy.
Although situated in the Green Belt the College’s future aspirations for growth, including the requirements for student accommodation and associated facilities, during the plan period will be recognised.

About 79% of the Borough is designated Green Belt where there is a presumption against inappropriate development except in very special circumstances. New development will therefore continue to be directed to areas within existing urban settlements. The existing designated Major Developed Sites in the Green Belt will be retained, where limited infilling and/or redevelopment will be permitted subject to meeting the specified criteria, with the exception of Royal Holloway University of London which will remain in the Green Belt but have its own bespoke policy approach. However, it is proposed to remove the former DERA site from the Green Belt to enable the creation of a new community in that location. This was predicated in the South East Plan but it is now a key part of the Runnymede Sustainable Community Strategy. This will provide a substantial element of future housing requirements for Runnymede.

It has however been judged appropriate to identify a contingency plan to address the difficulties raised if it becomes impossible to identify a five year housing land supply from sites within the urban areas. This would focus on the identified reserve sites to accommodate the additional housing required in a phased approach if minor shortfalls in supply are identified. If a serious shortfall develops in the latter part of the Plan period, the Borough Council would undertake a Boroughwide Green Belt boundary survey during the period of the Plan to identify any site that could be of use in meeting any such shortfall.
LP08: The former DERA site, Longcross

The Vision for the former DERA site The provision of a high quality new mixed use community, where new residents will be able to access on-site services and facilities to fulfil many of their daily needs. It will also provide employment opportunities in the form of a high quality business park that will facilitate economic growth. The mixed use community will be supported by infrastructure to deal with the impacts on both the existing and new communities. The future development of the site will be set within the context of a master plan, which may be in the form of outline planning applications.

The area as identified on the Proposals Map (bounded to the north by the London Waterloo to Reading railway line, to the east by Kitsmead Lane, to the south by Longcross Road and to the west by the administrative boundary between the Borough and Surrey Heath Borough) will, upon adoption of this Local Plan Core Strategy, be removed from the Metropolitan Green Belt.

The development will:

- Deliver in the region of 1,500 high quality dwellings of a mixed tenure and type including the provision of affordable housing in accordance with Plan policy SP02
- Deliver not less than 79,000 m$^2$ of employment development located on the northern part of the site, including a variety of provision from small start-up through to large headquarters style office provision, subject to local need
- Provide appropriate educational facilities to meet the needs arising from population growth associated with the DERA development
- Facilitate upgrades to Longcross Station which currently serves the site, with the aim of an increased stopping service on the Reading to Waterloo railway line
- In addition to employment development, provide facilities for the development, including retail, community, health, nursery, recycling facilities and a variety of leisure spaces, to enable residents and workers to have access to facilities that fulfil day to day needs
- Provide on and off site Highway works required by the development
- Provide public transport to serve the development
- Provide for comprehensive mitigation for adverse effects on the TBHSPA at Chobham Common
- Provide opportunities to create a network of Green Infrastructure, to create a high quality green environment
• Protect the existing listed building and terrace and their settings, and the Scheduled Ancient Monument, within any development scheme

• Take account of the wooded character of parts of the site, with a landscape strategy and long term management plan being provided alongside the built development

• Be constructed to at least meet sustainable construction requirements and carbon emissions as required by the Building Regulations in force at that time. Opportunities for the use of renewable energies will be encouraged.

• Provide a bridge for pedestrians, cyclists and vehicles over the M3 motorway to provide a link between the northern and southern parts of the site

• Have regard to the existing ecological qualities of the site and provide enhancements in accordance with a full and detailed ecology strategy

• Be delivered in phases throughout the Plan period and each phase shall be supported by the relevant facilities and infrastructure.
Inspector’s Question of the Runnymede Borough Council

Question 1: Green Belt Review

In the Housing Context Technical Paper (RUN 019) on page 18 it states (under Green Belt): '... the Council has reviewed its Green Belt boundary ...'. In paragraph 6.58 it states: '... the Council has undertaken to carry out a Borough wide Green Belt boundary survey ...'. I can find no reference to a Green Belt Review document in the Examination library.

Could the Council explain the current situation with regard to the Green Belt Review?

The Inspector would appreciate the Council’s reply by Tuesday 18 February 2014 at the latest please.

David Hogger
Inspector
4 February 2014
Inspector’s Question ID/1: Green Belt Review

In the Housing Context Technical Paper (RUN 019) on page 18 it states (under Green Belt): ‘… the Council has reviewed its Green Belt boundary …’. In paragraph 6.58 it states: ‘… the Council has undertaken to carry out a Borough wide Green Belt boundary survey …’. I can find no reference to a Green Belt Review document in the Examination library.

Could the Council explain the current situation with regard to the Green Belt Review?

Runnymede Borough Council Response

Local Plan (RUN 001) policy LP01 (at page 52) sets out the Council’s position with regard to the carrying out of a Boroughwide Green Belt Review: "If a serious (housing) shortfall develops in the latter part of the Plan period, the Borough Council would undertake a Boroughwide Green Belt boundary survey during the period of the Plan to identify any site that could be of use in meeting any such shortfall".

No Boroughwide Green Belt Review has been carried out to date in the context of the Local Plan and hence there is no reference in the Examination library.

The reference in the Housing Context Technical Paper (RUN 019) at page 18 to the review of the Local Plan Green Belt boundary is concerned solely with the proposed development of the former DERA site. Local Plan (RUN 001) policy LP08 (at page 93) sets out the approach to be taken to the DERA proposal, including the definition of the area that “will, upon adoption of this Local Plan Core Strategy, be removed from the Metropolitan Green Belt”. The question of the extent of the area to be considered for possible exclusion from the Green Belt was the subject of a specific public consultation in February/March 2010; the DERA Boundary Consultation document is at Appendix 24 of the Council’s Consultation Statement (RUN 008).

Richard Ford

6 February 2014
Appendix 6

Green Belt Review Tender Advert

Georgina Pacey

From: WebTeam
Sent: 09 September 2015 20:38
To: Georgina Pacey
Subject: FW Urgent: Tender for website.
Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

FYI

Sujata Majithia | Help Desk Analyst and Web Developer | Runnymede Borough Council
sujata.majithia@runnymede.gov.uk | 01372-450002 (direct line) | www.runnymede.gov.uk

Think Before You Print This

This message, and associated files, is intended only for the use of the individual or entity to which it is addressed and may contain information that is confidential or subject to copyright. If you are not the intended recipient please note that any copying or distribution of this message, or files associated with this message, is strictly prohibited. If you have received this message in error, please notify us immediately. Opinions, conclusions and other information in this message that do not relate to the official business of Runnymede Borough Council shall be understood as neither given nor endorsed by Runnymede Borough Council.

From: Jane Pobardy
Sent: 12 March 2014 14:25
To: WebTeam
Subject: Urgent: Tender for website.
Importance: High

Could the following tender be put on the website, as soon as possible please! I would be grateful for email confirmation that it is on.

Contract Title: Green Belt Review

Description/object of the contract:
Runnymede Borough Council wishes to procure a Consultant to produce a Green Belt Review, which is intended to inform the new Local Plan Coro Strategy (LPCS). The LPCS (2013-2028) is scheduled for examination in mid-2014 with a preliminary hearing scheduled for 9th April 2014.

Estimated date of award of contract: 12th May 2014

Contact details: Policy and Strategy Team, Runnymede Borough Council, Attention of Richard Ford, Civic Centre, Station Road, Addlestone, Surrey KT15 2AH. Tel: 01372 425288 e-mail: tenders35@runnymede.gov.uk
Appendix 7

RBC response to LPCS Inspector’s MIQ 1.4(f)

1.4 (f) Has the Council positively sought opportunities to meet the development needs of the area (NPPF para 14) and have all opportunities for accommodating a higher number of dwellings been properly tested?

1. The Council has strived to positively seek opportunities to meet the development needs of the Borough throughout all stages of Plan preparation. As outlined in the Housing Context Technical Paper, July 2013 (RUN019), and as shown on the policies maps (RUN002) the Borough is heavily constrained by the Green Belt, flooding and ecological designations in particular which limit the potential areas for growth over the Plan period. The Council recognised this at an early stage of Plan preparation and realised that a strategic Green Belt release would be necessary if the Council was to strive to meet the development needs of the Borough up to 2028.

2. As such, the Council proposes to release the former Defence Evaluation and Research Agency (DERA) site from the Green Belt for mixed-use development, which will allow for the delivery of around 1500 houses and at least 79,000 m2 of employment development (see policy LP08 in document RUN001 for a more detailed list of what facilities will be provided at the site). Comprehensively developing the former DERA site is seen as an opportunity to help meet the development needs of the Borough over the Plan period in a sustainable way having carefully assessed all of the constraints to development that Runnymede faces and the options available to provide growth. The Council has assessed alternative sites which could have been released from the Green Belt to help meet the development needs of the Borough in RUN022: Assessment of Reasonable Alternative Strategic Sites. The DERA site was considered to be the site which allowed for the most sustainable form of development.

3. In terms of whether all opportunities for accommodating a higher number of dwellings have been properly tested, the Housing Context Technical Paper (RUN019), which the Council published in July 2013 made an assessment of how much housing could be delivered within the Borough, given the constraints. The key constraints are identified on pages 16-19 of the document. Pages 21-29 outline how the Council has sought to explore all realistic options for maximising the delivery of housing over the Plan period.

4. It has been concluded that it would not be possible to deliver new housing within some of areas of the Borough due to their constraints as it would conflict with the key aim in the NPPF to deliver sustainable development. For example, no residential development is proposed within flood zone 3, which is particularly important given that the Borough has a
history of flooding, most recently in December 2013 and January and February 2014. Indeed Runnymede is recognised as a top 10 local authority for flooding. As such, the Council continues to promote a strategy which directs new development away from these high risk areas. As approximately 22% of the Borough is located in flood zones 3A and 3B, including parts of the Borough’s Urban Areas, this has limited the number of dwellings which the Council might otherwise have been able to plan for.

5. The only realistic option available to the Council to significantly increase the opportunities available to meet identified housing and employment needs over the Plan period was concluded to be a review of the Borough’s Green Belt boundaries. As a result, key to the Council’s pro-growth strategy to maximise development opportunities as far as possible in the Borough over the Plan period without conflicting with specific policies in the NPPF, the Council has chosen to propose the release of a large area of Green Belt land on the western side of the Borough (land also in flood zone 1) at the former DERA site (discussed in more detail in paragraph 2 above). The release of the former DERA site is considered to maximise the opportunities to meet the housing and employment needs of the Borough over the Plan period whilst seeking to minimise as far as possible harm particularly to the seriously fragmented Green Belt in this part of Surrey.

6. Paragraph 6.57 of RUN019 considers this point in more detail noting that aside from the proposed release of the DERA site, it is not proposed to make any other amendments to the Green Belt boundary in Runnymede at the current time. The justification for this is that,

‘As noted in the 1988 Department of the Environment booklet ‘The Green Belts’, under the section entitled ‘Topography’, the western sector of the Metropolitan Green Belt (which includes Runnymede Borough) is identified as the “most seriously fragmented of all”. It acknowledges that “much of this area lies in the flood plain of the Thames where the Green Belt serves mainly to prevent the coalescence of neighbouring communities. Major sources of employment on the western side of London, including Heathrow Airport, have always generated strong pressures for new development in this sector which the Green Belt has kept in check”. As referred to in paragraph 3.1 above, the London Fringe section of the SEP recognised the common contextual issues and challenges still facing the area today and the need to support sustainable economic growth whilst “maintaining the regional role of the Metropolitan Green Belt in containing London and retaining the identity of existing towns in this densely settled area” (paragraph 20.2).

7. The recent letter from Nick Boles to Sir Michael Pitt at the Planning Inspectorate (RBC/10) reaffirms the Government’s commitment to protecting the countryside and, in particular, the Green Belt, stating that, ‘the special role of Green Belt is also recognised in the framing
of the presumption in favour of sustainable development, which sets out that authorities should meet objectively assessed needs unless specific policies in the Framework indicate development should be restricted. Crucially, Green Belt is identified as one such policy (Council’s emphasis). Furthermore, this letter confirms that, ‘It has always been the case that a Local Authority could adjust a Green Belt boundary through a review of the Local Plan. It must however always be transparently clear that it is the local authority itself that has chosen that path (Council’s emphasis).’

8. Overall, for the reasons outlined above the Council considers that it has positively sought opportunities to meet the development needs of the area in line with NPPF para 14 and has explored all sustainable opportunities for accommodating a higher number of dwellings.

9. In terms of demonstrating that the Council has properly tested the options for accommodating a higher number of dwellings, the Council undertook a number of Sustainability Appraisal and Strategic Environmental Assessments on the impacts of delivering a range of annual housing figures, ranging from 145 dpa to 550 dpa. The results of the assessments can be viewed in the submitted Sustainability Appraisal Report (including its addendum) (RUN003). The conclusions of the report leads the Council to believe that the number of dwellings proposed per annum over the Plan period (220) would result in a neutral effect on the environmental receptors.
Appendix 8

See separate document – Tender Brief
To: Ian Maguire
Head of Planning
Runnymede Borough Council

Dear Mr Maguire

Runnymede Local Plan Core Strategy

1. Following the publication in February of my initial concerns regarding the Runnymede Local Plan Core Strategy (LPCS), a Hearing Session was held on 9th April to discuss the duty to co-operate (the duty) and the Council’s broad approach to housing provision. My conclusions on those two matters are contained in the following paragraphs.

2. For the avoidance of doubt I have taken into account the planning guidance that was launched on 6 March 2014. This guidance does not change policy but sets out in the one document how existing policies should be applied.

DUTY TO CO-OPERATE

Preamble

3. In terms of the duty, the Council’s evidence is largely contained within Core Document RUN 007 (and Addendum) but I have also taken into account the content of the submitted representations; the Statements on the matter in response to my Issues and Questions on Matter 1; and the discussion at the hearing session. I have also considered the Minutes of the Planning Working Group in Surrey - PWG (2012-2014) and the Surrey Planning Officers’ Association1 - SPOA (2012-2014) which were submitted by the Council after the hearing session.

Background

4. The Localism Act 2011 establishes the duty to co-operate (the duty). It stipulates that, in this case, the Borough Council is required to engage constructively, actively and on an on-going basis in the preparation of Development Plan Documents, so far as they relate to strategic matters. The engagement should include consideration of whether to consult on and prepare, and enter into and publish, agreements on joint approaches towards the preparation of planning documents. The Act also confirms that regard must be given to any guidance from the Secretary of State on the matter. That further guidance is primarily the National Planning Policy

---

1 RBC/23 and RBC/24
RBCLP_14
Framework (NPPF), supplemented by the planning guidance that was published in March.

5. The NPPF confirms that public bodies have a duty to co-operate on planning issues that cross administrative boundaries, particularly those that relate to strategic priorities, such as the delivery of homes and jobs needed in an area. Strategic priorities across local boundaries should be properly co-ordinated and clearly reflected in individual local plans. The implication is that local planning authorities should work together to assess the opportunities that exist for the substantiated unmet development requirements of one local authority to be met within the area of one or more nearby local authorities within the housing market area. The Act and the NPPF were published well before the LPCS was submitted for examination in 2014.

6. As well as the legal requirement regarding the duty, the LPCS must also be found sound, which includes a requirement for it to be positively prepared and effective. This means it must be based on effective joint working on cross-boundary strategic priorities.

7. I have taken into account the fact that there is no duty on local planning authorities to agree to accommodate the needs of a neighbouring authority but if that is the conclusion that has been reached, it must be based on clear and robust evidence and on a proper consideration of all the issues by all the relevant parties. I am also aware that nearby local planning authorities are at different stages in the plan making process, but that does not negate the requirement for co-operation.

Processes Undertaken

8. The Council did not establish a robust framework or methodology within which ‘co-operation’ could be progressed or monitored – for example in terms of frequency, issues to be addressed, outcomes to be anticipated, outcomes delivered and bodies to be involved. I accept that there is no specific requirement in the legislation to take a structured approach. However, the Council needs to demonstrate co-operation, co-ordination and continuous engagement and one way this may be achieved is through a more transparent process that can be appropriately managed and monitored.

9. Core document RUN 007, in paragraph 9, seeks to report how the Borough Council has co-operated with others during the preparation of the LPCS. The fifth bullet point refers to consultation and engagement with adjoining planning authorities and the County Council to discuss cross-boundary issues, although the issues are not specified. Paragraph 10 (third bullet point) takes the reader to Appendix B (Cross Boundary Co-operation with Neighbouring Authorities), which the paragraph states will demonstrate more clearly how the Council has discharged its responsibilities. In Appendix B is a list of nearby local planning authorities and a row entitled ‘strategic cross-boundary issues and evidence of how these have been addressed’. However, there is no reference to housing or employment as being a strategic cross-boundary issue.
10. I was told at the hearing that this is only meant to be a list of issues where some progress has been made, although that is not clear in the document itself. The Council then referred me to Appendix D which is a list of meetings with other planning authorities. However, these meetings were mostly held during the consultation period (14th Feb to 28th March 2013) and it specifically says that they are ‘part of the consultation’. Issues discussed include Housing Strategy and the Strategic Housing Market Assessment/Housing Need but the issues are framed as questions and there is no question related to the housing and employment needs of the wider area. Whilst the involvement of nearby local planning authorities during periods of public consultation is appropriate, it could not accurately be described as constituting sustained joint working on an on-going basis. It also does not demonstrate that co-operation was sought in the early stages of plan preparation.

11. There is a row in the Table entitled ‘Actions Arising from the Meeting’ but there is no commitment to any further meetings or to the consideration of issues pertinent to the duty. The only such reference relates to Surrey Heath Borough Council (SHBC) where it is stated that it has raised duty to co-operate objections but there is no indication of any consideration of how or if those objections could be resolved.

12. Meetings with SHBC were held on 16th October 2012 and 11th April 2013. They related to the DERA site (which is on the boundary between the two authorities) and other strategic matters. It was agreed that ‘housing shortfall’ is a strategic matter but there is no indication of how any shortfall would be further considered.

13. I turn now to the Addendum to RUN 007, which covers the period June 2013 to January 2014. The Introduction states that the document ‘seeks to detail the methods of co-operation and the outcomes’. The first section deals with the period between June and August 2013 but relates primarily to co-operation on a Strategic Housing Market Assessment. There was a meeting on 14th June 2013 at which representatives of planning departments across Surrey were present. A presentation was given by consultants, part of which referred to the duty. A briefing note was prepared following the meeting but although there is a section entitled ‘Current Situation and Next Steps’ there is no clear framework to demonstrate how it was intended to take the issue forward.

14. The Addendum then considers the period between August 2013 and January 2014. However, the only significant co-operation that is referred to is an e-mail sent by the Borough Council on 3rd September 2013 to 11 nearby local planning authorities which formed part of the public consultation exercise on the pre-submission version of the LPCS. This did not confirm that Runnymede could not meet its OAN – the question in the e-mail was framed loosely: _If it emerged that Runnymede was unable to accommodate the level of housing development sufficient to meets its objectively assessed need, would your Council be prepared to accept that a proportion of our housing requirement could be provided for in your area?_

15. Firstly this e-mail was sent very late on in the plan preparation process, way beyond the ‘initial thinking’ stage. Secondly the Council were aware at RBCLP_14
that stage that its OAN could not be met within the Borough, so it is a little disingenuous for the question to imply that the Council may not need to seek the co-operation of nearby local planning authorities.

16. I was told at the Hearing that because no positive responses were received to those e-mails, the Council saw no benefit in continuing the process. This does not demonstrate co-operation, co-ordination or continuous engagement. It does not reflect a pro-active approach. I understand that in many circumstances engendering co-operation is not an easy process but the Council appear to have given up at an early hurdle.

17. There appears to have been little involvement of elected Members. I was told that discussions about the duty took place at a Workshop on 26th March 2014 at which Council Leaders, Planning Portfolio Holders, Chief Executives and Heads of Planning were present. However, at the time of the Hearing there was no reported outcome from that meeting, although there was a reference to the potential for a Memorandum of Understanding – albeit too late for me to take into account should it emerge.

18. In answer to my question 1.1, regarding co-operation, the only organisational structure referred to which was ‘set up specifically to deal with sub-regional issues’ is the Thames Basin Heaths Special Protection Area Joint Strategic Partnership Board. There is no reference to any similar approach being taken with regard to meeting housing or employment needs.

Has Engagement been Constructive?

19. There has been engagement between nearby local planning authorities but in terms of meeting housing and employment needs I would not describe it as being focussed or thorough. A relatively small number of meetings have been held but there does not appear to have been any impetus or concerted effort to address the issues around strategic priorities. It has not been demonstrated that appropriate conclusions have been drawn at those meetings and that the Councils have acted on those conclusions. The meetings do not appear to have improved the likelihood of effective co-operation or progressed the matter in any significant way and they could not accurately be described as constructive.

Has Engagement been Active?

20. In the Minutes of the meetings that I refer to in paragraph 3 there are few significant references to the duty. At the meeting of SPOA on 20th September 2013 there is a reference (attributed to Runnymede Borough Council) to a signed letter of agreement and a Memorandum of Understanding ‘through Surrey Leaders’ but I am not aware of any progress being made on these. On 24th January 2014 there is a reference to the need to ‘drive’ the issue forward (i.e. the duty) but no timetable is given and there is no clear indication of how that ‘drive’ would be achieved.

2 See paragraphs 2 and 3 of the Council’s answer to my question 1.3 in document RBC/16.
3 See RBC/16
21. At the 28th February 2014 SPOA meeting there was a reference to the Workshop on 26th March 2014 (see paragraph 17 above) but I note that at the 28th March SPOA meeting it is recorded that there was ‘some concern that the meeting on the 26th was not quite what was advertised’. In any event I have not been advised of the outcome of that Workshop which in any case was held after the submission of the LPCS.

22. In terms of PWG meetings there are a number of brief references to the duty and at the meeting on 13th April 2012 it was confirmed that ‘the process should start as soon as possible’ However, no detailed cross-boundary actions appear to have been agreed.

23. On the evidence that I have been given I am unable to conclude that the Council has been sufficiently active in trying to garner co-operation. There is little evidence that engagement has been active, or indeed constructive and collaborative. The number of meetings specifically to consider the issues appears to be relatively low and the reliance only on an exchange of e-mails between Councils (at the pre-submission stage) and some limited exchanges on the matter at the group meetings, does not demonstrate a sufficient level of activity.

Has Engagement been On-going?

24. Co-operation should start with the ‘initial thinking’ (NPPF paragraph 181) and evidence of effective co-operation should be demonstrated at the time the Local Plan is submitted. There is little evidence that this principle was embedded in the Council’s approach during the earlier stages of plan preparation. The Act came into force in 2011 and the NPPF in March 2012. There would therefore have been the opportunity for the Council to consider its approach to fulfilling the duty prior to the publication of the plan for consultation in February 2013 and again before the second consultation in August 2013.

25. In a letter dated 3 April 2012, from the Chief Executive of Surrey Heath Borough Council to the Chief Executive of Runnymede Borough Council, it is suggested that a meeting be arranged to include discussion of the duty. Runnymede’s Chief Executive confirmed that he would be pleased to take up the offer of a meeting but the representatives of both the Councils at the hearing confirmed that no such meeting took place. In my opinion this is an indication that engagement has not been on-going, despite opportunities being available for a constructive approach to be adopted from the outset. The first meetings that are specifically referred to as ‘duty to co-operate meetings’ were mostly held in February 2013 and are summarised in Appendix D of RUN 007 (see paragraphs 10 and 11 above). There is no indication that any further similar meetings were suggested or arranged. Engagement could not accurately be described as frequent or on-going and the evidence does not demonstrate that consideration of cross-boundary issues has been taking place from ‘initial thinking’.

---

4 See RBC/20
RBCLP_14
Has Engagement been Collaborative?

26. My broad conclusion is that the evidence submitted by the Council does not demonstrate that appropriate mechanisms are in place to engender co-operation. Without clear objectives (which should have been established at the earliest opportunity following the commencement of the legal duty) regarding what the Council was seeking to achieve through co-operation, it is not possible to conclude that engagement has been collaborative. I accept that it is inevitable that different Councils will be at different stages in terms of plan preparation but I would have expected more robust evidence of collaborative engagement. No joint committees have been established specifically to address the Duty to Co-operate; no joint planning policies are proposed; and no Memoranda of Understanding have been signed. This reflects a lack of positivity and commitment to joint working.

Has Engagement been Diligent?

27. No in-depth analysis of the issues facing the local planning authorities in the wider area has been undertaken and no robust assessment of how those issues should be addressed has been prepared. There appears to be a lack of commitment to seeking a way forward. Therefore in terms of fulfilling the duty I would not describe the approach of the Borough Council as being diligent.

Has Engagement been of Mutual Benefit (the broad outcomes)?

28. Mutual benefit has not been sought yet alone achieved. As I have suggested elsewhere, it may not be possible to achieve a high level of mutual benefit but if that is the case then the evidence has to be available to demonstrate that at least the achievement of mutual benefit has been sought.

29. The Minutes of the Working Group Meetings (referred to earlier) do not report on any significant outcomes, for example there are no jointly commissioned documents proposed and this was confirmed by the Council at the Hearing.

30. The outcomes of the limited engagement are minimal and it can be concluded that strategic housing priorities across boundaries have not been properly addressed or co-ordinated and that any engagement has not been of mutual benefit.

Conclusion on the Duty to Co-operate

31. Co-operation should produce effective and deliverable policies on strategic cross boundary matters, which in this instance includes housing and employment. Effective co-operation is likely to require sustained joint working and there should be clear outcomes, one way or another. However, there is insufficient comprehensive and robust evidence to enable me to conclude that every effort has been made by Runnymede Borough Council to seek co-operation with other nearby local planning authorities.
Although there has been recent activity with regards to the duty, it is too late in the process for me to give it significant weight. It is an indication, however, that progress on the matter may be achieved in the near future.

**THE COUNCIL’S BROAD APPROACH TO HOUSING PROVISION**

32. Paragraph 159 of the NPPF advises that local planning authorities should have a clear understanding of housing needs in their area and should ‘prepare a Strategic Housing Market Assessment to assess their full housing needs, working closely with neighbouring authorities where housing market areas cross administrative boundaries’.

33. The Council’s Strategic Housing Market Assessment (SHMA) was published in 2009 and this identified a need for 1,316 dwellings a year (of which market housing is 775 dwellings). The Council accepted, however, that the weight to be attached to the SHMA is limited and it was confirmed that a new SHMA is being prepared, with completion scheduled by the end of this year. Bearing in mind the current SHMA is based only on the Borough boundary of Runnymede (and the Council are currently considering a SHMA based on a much wider geographical area\(^5\)), I agree that it should be afforded little weight.

34. Although the Council does not have an up-to-date SHMA, covering a more appropriate housing market area, it has nevertheless concluded that its objectively assessed housing need (OAN) is 595 dwellings a year\(^6\). This figure is based on the interim 2011 based sub-national population predictions and the 2011 DCLG household projections. Although I have not tested the evidence on which the Council’s conclusions are based, I note that a number of representors agree that the Council’s OAN figure can be broadly justified on that basis.

35. Whilst I have attached some weight to the Council’s findings, I remain concerned that the figures may not accurately reflect the situation over the housing market area as a whole and have not taken into account market signals (e.g. land prices, house prices etc.) or fully encompassed the needs for different types of housing.

36. Having concluded that the OAN is 595 dwellings a year, the Council considered the constraints to development in the Borough. These are identified in The Housing Context Technical Paper and include areas of flood risk, Green Belt and Special Areas of Conservation. I agree that these are significant constraints. Primarily as a consequence of these constraints, the Council has concluded that the housing target should be a minimum of 220 dwellings a year (i.e. 37% of OAN). This is a significant shortfall and further emphasises the need for the Council to have fulfilled the duty to cooperate in a more collaborative and robust way, with the objective of seeking to meet a greater proportion of its housing need, either within the Borough or elsewhere in an appropriately defined housing market area.

---

\(^5\) Area 55+ (see RUN 007 Addendum)
\(^6\) See Core Document RUN 019
37. Within the 3,300 additional dwellings proposed over the plan period, the Council is placing significant reliance on the DERA site (1,500 dwellings), which is currently identified as a major developed site in the Green Belt. This may be an appropriate strategy for the Council to follow but there needs to be a clearer justification for the release of this site, as opposed to other sites within the Green Belt. An Assessment of Reasonable Alternative Sites\(^7\) was undertaken by Barton Wilmore on behalf of Crest Nicholson and Aviva Investors (the promoters of the DERA site). The efficacy of such an approach was questioned by a number of respondents and although I understand that the impartiality of the authors could be questioned, the Council confirmed that it was satisfied with the approach taken.

38. My concerns relate more to the details in the Assessment which was published in 2012. Firstly the Report is prepared on the premise that the Council is seeking to provide 161 new dwellings a year, as opposed to the 220 referred to in policy LP02; and secondly, bearing in mind the significant shortfall in meeting housing need, there is insufficient justification as to why the minimum site thresholds have been set at 10ha and 300 dwellings. Smaller sites have only been considered ‘in combination with other identified sites where these immediately adjoin one another’.

39. Policy LP02 identifies 5 reserve sites ‘which may be required to meet long-term housing needs’. Although some of the sites are comparatively small, it is nevertheless my opinion that the Council should have given greater consideration to the role that these sites could play in helping to address the unmet housing needs in the short and medium term.

40. With regard to the Green Belt, I note that the Council is commissioning a Borough-wide Green Belt Review, which I was told will be completed by October 2014. This work will enable the Council to assess whether or not there are any potential sites that could be released from the Green Belt.

**Conclusion on the Council’s Broad Approach to Housing Provision**

41. For the reasons given above I consider that the Council’s evidence with regard to housing need and provision is not sufficiently robust. In other circumstances it may have been possible to suspend the Examination to enable the Council to undertake further work and I am mindful that work on the SHMA and the Green Belt Review is already programmed but is unlikely to be fully concluded until the end of this year. The Council would then need to consider amendments to the submission LPCS in order to accommodate the findings of the work, thus causing further significant delay to the Examination. In any event, whatever my conclusions may be with regard to housing provision, they would not overcome the failure to meet the duty to co-operate.

**Overall Conclusion and the Way Forward**

42. I am not satisfied that all available options for co-operation have been properly explored, that the Council has engaged constructively, actively and on an on-going basis and that the guidance in the NPPF has been given

\(^7\) Core document RUN 022

RBCLP\_14
sufficient regard. My finding that the duty to co-operate has not been fulfilled is sufficient on its own to request that the Council withdraws the LPCS.

43. In terms of the Council’s approach to identifying and seeking to meet housing demand I consider the evidence base to be inadequate, insufficiently up-to-date and not reflective of all relevant market and economic signals. The quality of the evidence not only has consequences for the Council’s policies but also devalues any co-operation that may have been sought because it is reasonable to expect co-operation to be based on a strategy that seeks to boost significantly the supply of housing in a sustainable way.

44. In summary, whilst recognising the significant constraints to development within the Borough, I do not consider that the Council has positively sought opportunities to meet the development needs of Runnymede.

45. I understand that this is not the conclusion that the Council would have wanted. However, the up-dated SHMA will be completed by the end of the year, as will the Green Belt Assessment. These two documents, together with other existing evidence, will enable the Council to produce an up-to-date plan for the Borough, within a relatively short timescale, based on robust and justified information. This delay in plan preparation will also ensure that effective co-operation with other nearby local planning authorities can be sought. It was suggested at the Hearing that any delay to the adoption of the Plan may result in housing needs not being met in the short term and I agree that any delay in the plan making process should be avoided if possible. However, in order to be effective plans should be based on up-to-date appropriate evidence. That is not the case here and in these circumstances I must advise the Council to withdraw the Plan (under S22 of the Planning and Compulsory Purchase Act 2004 - as amended), up-date the evidence base and undertake a more rigorous assessment of cross-boundary issues. In so-doing the Council must ensure that it meets the requirements of the Duty to Co-operate. Having carried out the necessary consultation, sustainability and viability work, the Council should re-submit the Plan as soon as possible. The alternative would be for me to write my Report but it would conclude with a finding of legal non-compliance and unsoundness. I would be grateful if you could confirm the Council’s position via the Programme Officer as soon as possible.

46. This also means that the Runnymede Community Infrastructure Levy: Draft Charging Schedule will have to be withdrawn because there will be no up-to-date relevant Plan for the area.

Yours sincerely

David Hogger
Inspector

29th April 2014

RBCLP_14
Appendix 10

Jane Peberdy

From: Tineke Ronnie <Tineke.Ronnie@arup.com>
Sent: 12 June 2014 15:49
To: Jane Peberdy
Cc: Kate Waiters; Victoria Robinson; Christopher Tunnell
Subject: Runnymede Green Belt Review
Attachments: Revised Programme hours 12D014.xls; ATT00001.txt; ATT00002.htm
Follow Up Flag: Follow up
Flag Status: Completed

Jane,

It was good to meet with you last week, and understand more about the context for Runnymede, which was really informative. I understand that you discussed next steps with Kate yesterday and potential changes to the timeline. In line with this conversation, below is a general outline of the minor changes to the methodology and I have also attached a revised timeline based on this—as discussed yesterday this would mean the timetable would slip a few weeks upfront in order to complete a fuller analysis before the first workshop and the assessment. Could let me know if you are happy that this works with your timeframe for the plan preparation.

As discussed, our first output will be the Phase 1 Review rather than an inception note summarising last week’s meeting. The Phase 1 Review will undertake an assessment of the existing Green Belt boundary by testing ‘General Areas’ against the five purposes of the Green Belt as set out in the NPPF. We propose the following steps:

Phase 1 Reviews: test General Areas against the five Purposes of the Green Belt

a. Produce methodology and proforma to define the NPPF purposes of the Green Belt in the context of Runnymede. This will explore and set out the NPPF references of ‘large built up areas’, ‘neighbouring towns’ or ‘countryside’ specific to Runnymede. We will also obtain an understanding of where the neighbouring local authorities are up to in terms of their Green Belt Reviews and what they might consider to be ‘neighbouring towns’, and ‘countryside’.

b. Define General Areas – our initial view and based on past experience is that the ‘General Areas’ will be defined by existing strongly defined boundaries, officer of settlements and villages that are not ‘washed over’ by Green Belt. However, as outlined above we would like to discuss the proposed ‘General Areas’ and seek agreement with you on these areas whilst we’re doing this. Our initial review suggests that there will be no more than 25-30 ‘General Areas’. We will ensure that the ‘General Areas’ are defined by ‘defensible boundaries’ and that the definition is consistent.

c. Define a ‘scoring assessment methodology’ for appraising areas of the Green Belt against the purposes of the NPPF based on both qualitative and quantitative appraisal and on recent good practice examples. Again we will discuss and agree with you the threshold early in the Phase 1 Review process. The threshold will be used to identify areas which are not fulfilling, weakly fulfilling or moderately fulfilling the purposes of the Green Belt.

d. Undertake Phase 1 Review based on the existing Green Belt boundary

We will issue our draft Phase 1 Review for your review and to form the basis of the workshop to be held w/c 14th July. At the workshop we will seek to agree with you the definition of the ‘General Areas’ and the scoring assessment methodology for appraising areas of the Green Belt against the purposes of the NPPF. We will then discuss with you the constraints and agree the assessment criteria to be used for our next stage of work, the Phase 2 Technical Assessment.
Appendix 11

Notice under the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) – Regulation 27 and the Community Infrastructure Levy Regulations 2010 (as amended) - Regulation 18 (b)

Withdrawal of Runnymede Borough Council’s Local Plan Core Strategy and CIL draft charging schedule

On 24th July 2014, Runnymede Borough Council made the formal decision to withdraw its Local Plan Core Strategy under Section 22(1) of the Planning and Compulsory Purchase Act 2004. The decision was made on the same date to withdraw the Council’s Community Infrastructure Levy draft charging schedule under section 212(11) of the Planning Act 2008.

Work has commenced on the production of a new Local Plan. A revised timetable for the production of the Plan and associated documentation will be posted on the Council’s website in due course at: http://www.runnymede.gov.uk/planningpolicy

In the meantime any queries should be directed to the Council’s Policy and Strategy Team at planning@runnymede.gov.uk. Officers within this team can also be contacted on the phone numbers given below:

Richard Ford-01932 425278
Georgina Pacey-01932 425248
Cheryl Brunton-01932 425267
Babatunde Adebbutu-01932 425274
Jane Peberdy-01932 425252

Dated: 30th July 2014

Ian Maguire, Corporate Head of Planning and Environmental Services