MATTER 6 HEARING STATEMENT

RUNNYMEDE BOROUGH COUNCIL LOCAL PLAN EXAMINATION

SUBMITTED ON BEHALF OF MUSE DEVELOPMENTS LIMITED

JANUARY 2019
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1 INTRODUCTION

1.1 This statement has been prepared on behalf of Muse Developments Limited (‘Muse’).

1.2 Muse supports the fundamental aim and purpose of the Runnymede Local Plan in seeking to identify sites sufficient to accommodate the identified levels of growth for the plan period.

1.3 Muse is in the process of preparing a detailed planning application for the development of the land at Thorpe Lea Road West, Egham (Site Allocation SL8). As part of this process, Muse has engaged in a series of pre-application discussions with the Council and other key local stakeholders. Muse has also requested and received a Screening Opinion from the Council pursuant to the EIA Regulations.

1.4 The entirety of site (SL8) is identified as having capacity to deliver a minimum of 250 residential units within the period 2019-2024. Both the target capacity of the site and the delivery phasing are supported as a matter of principle by Muse; however, Muse confirms that it will be seeking to deliver 220 homes on land currently within its control, confirming that the majority of the 250 homes proposed is viable and a small additional requirement would remain on the allocated site.

1.5 Muse will attend the Stage 2 Hearings Examination in support of the proposed allocation of the site at Thorpe Lea Road, Egham.

1.6 For clarity, we can confirm that Muse supports the Council in its case regarding Matter 6 of the Stage 2 Hearings Examination, specifically:

- That the Council has carried out a thorough, objective assessment of all potential sites, including (but not limited to): a review of its Green Belt boundaries to support the release of land of least detriment to the objectives of the Green Belt designation; identification and implementation of a robust Site Selection methodology regarding the identification of sites to achieve sustainable development; a sound spatial strategy that is supported by a robust Sustainability Appraisal and Habitats Regulations Assessment clearly demonstrating that the proposed spatial strategy is the most effective for the Borough;
- That the Local Plan includes allocated sites which are consistent with the Plan’s spatial vision and objectives and with national planning policy;
- That there are exceptional circumstances sufficient to justify the proposed alterations to the Green Belt boundary at this site that will enable a sustainable development to come forward during the proposed time period;
- That the site allocation policies provide a useful framework in which a planning application can be prepared; however, to ensure consistency and to be effective, a degree of flexibility needs to be applied during the decision making process with regards to housing mix.
- That the overall spatial strategy for the Local Plan is supported in principle subject to the proposed amendments previously suggested by Muse at the Regulation 19 consultation in 2018
2.1 We respond to the specific matters arising in relation to Matter 6 below.

*Question 6.1 - Have the other site allocations in Policy SD3 and detailed in Policies SL2-SL18 emerged from a thorough, objective assessment of all potential sites, including review of Green Belt boundaries, sustainability appraisal and Habitats Regulations Assessment where necessary? In particular:*

a. *In selecting the allocations, has the Council applied suitable methodologies in a consistent way? If not, what are the weaknesses in the evidence base, do they fundamentally undermine the plan-making process, and which of the allocations may be unsound?*

2.2 Yes, the site allocations have emerged from a thorough, objective assessment of all sites considered available for development. This process is longstanding and has been supported by a wide range of evidence base documents that provides a robust assessment methodology.

2.3 Assessing sites through an 8 stage process has provided an opportunity for the Council to determine the sites appropriateness of the site for development on positive or negative impact criteria and a qualitative assessment made on Officer’s planning judgement. This approach is considered robust and preferred to a subjective point scoring exercise, which we agree can sometimes lead to a misrepresentation of a site. This is considered to be a suitable approach for Runnymede to ensuring the most suitable sites have been allocated.

2.4 Allocation SL8 has been rigorously tested and carried forward through all stages of assessment and consultation. On this basis we can confirm that the allocation is sound.

b. *Is it clear why the Council has decided to allocate the specific sites and not others?*

2.5 Yes, the Council’s decision to allocate sites which meet a collective objective of achieving sustainable development is clear. Evidence of the assessment of alternative strategies and the decision to dismiss such spatial strategies on the basis of greater impact on Runnymede’s landscape has also been provided. The extent of the evidence to this effect is considerable and effectively guides the decision maker.

c. *Is the proposed development of each of the allocated sites consistent with the Plan’s spatial vision and objectives and with national planning policy?*

2.6 It is agreed that the allocated sites put forward in the plan, positively address the approach of the spatial vision and objectives of the plan. The allocations will collectively and individually contribute towards the provision of sustainable growth across the Borough meeting social, environmental and economic pressures and needs.

2.7 With specific reference to allocation SL8, the requirements of the allocation are consistent with the vision and objectives of the plan and with national policy objectives. The allocation is for a suitable, available and
achievable site within Egham, which is identified within the spatial distribution as a top tier location where regeneration and a significant amount of residential growth will be focused. The site is currently underutilised and its development is capable of meeting the Council’s needs as evidenced in the planning application recently submitted which is the result of considerable pre-application discussions.

**Question 6.2 - With regard to the specific characteristics of each of the allocations, are there exceptional circumstances that are sufficient to justify the proposed alterations to the Green Belt boundary?**

2.8 In order to meet its housing need, it is clear that the majority of new housing development must occur within the Council’s Green Belt.

2.9 Paragraph 83 of the NPPF allows for the alteration of green belt boundaries only in "exceptional circumstances" through the preparation or review of a local plan, and paragraph 84 says local authorities should "take account of the need to promote sustainable patterns of development" when drawing up or reviewing Green Belt boundaries. Muse contends that the most sustainable patterns of development has been pursued by the Council which is supported by its evidence base. Most notably the production of the Exceptional Circumstances paper (December 2017) and its Addendum in May 2018 identifies the specific characteristics of each allocation that justify the proposed alteration to the Green Belt.

2.10 Whilst unnecessary to duplicate the circumstances which the Council has previously identified, Muse emphasises the following clear and unambiguous circumstances that justify the proposed release of the site from the Green Belt.

**The inherent constraints on the supply/availability of land suitable for development**

2.11 The SLAA (2017) identifies that there are insufficient suitable, available and achievable sites in the urban areas within the Borough to meet housing needs. The Council recognises that sites must be released from the Green Belt and allocated for housing. The inclusion of ‘medium’ sized sites as a suitable strategy in which to meet housing need in the Borough is appropriate given the availability of sites, and ability to reduce impact on Green Belt land through smaller-scale de-designation in sustainable locations. In summary, the updated Sustainability Appraisal Addendum (May 2018) concludes that the Council’s current spatial strategy provides the greatest certainty on deliverability of development in the Borough in light of testing alternative strategies which, as is now clear, would impact further on infrastructure and landscape constraints. It is imperative in meeting its strategic objectives to deliver a sound plan that there is confidence in the Council’s ability to deliver homes on sites which encounter the least constraints.

2.12 Through further technical assessment, site SL8 is now capable of delivering a higher quantum and density of development than originally suggested, thereby relieving pressure on the need to impact sites with higher levels of constraints.
The difficulties in achieving sustainability without impinging on the Green Belt

2.13 A strategy for growth without releasing some Green Belt land would be an inherent constraint on the supply of land suitable for development. Runnymede is not in a position to achieve sustainable development without encroaching onto the Green Belt. The difficulty arrives in determining where the most sustainable sites within the Green Belt are located for their release.

2.14 The availability of brownfield land is falling as noted within the recent AMR where it is clear that the brownfield opportunities that presented themselves for redevelopment have been utilised. Those remaining sites which are identified in the draft plan and which are available, achievable and deliverable are outlined as being capable of delivering just 32% of its housing need.

2.15 Paragraph 84 of the NPPF clearly advises plan makers to take into account the need to promote sustainable patterns of development when reviewing Green Belt boundaries. The Site’s release from the Green Belt would contribute towards achieving such an aim for delivering homes in Egham, the merits of such location having being consistently highlighted throughout the Council’s own evidence base. The Council’s spatial strategy is driven by the identification of sites and areas such as our client’s land that are located close to existing centres of population and with direct access to the services, facilities and infrastructure that serves them.

The nature and extent of the harm to the Green Belt

2.16 The Council’s detailed assessment of the Green Belt goes on to confirm that the SL8 site plays a limited role in respect of the wider strategic Green Belt and would not harm its overall integrity. It is also clear from the assessment undertaken by the Council and Muse, that the site does not play a role in the provision for outdoor sports and recreation, is not countryside that is capable of being accessed by the general public, is not a landscape that is worthy of protection and the development of the site will result in significant gains to landscaping provision, public access, visual amenity and biodiversity. It will also contribute significantly to the social and economic elements of sustainable development.

2.17 Fundamentally, the site’s release from the Green Belt:

- Would not result in the merging of neighbouring towns as the parcel of land performs weakly against this function;
- Would not impact on the perceived sense of separation between settlements as it makes no discernible contribution to separation;
- Is justified by the existence of strong, defensible long-term Green Belt boundaries;
- Would not result in sprawl as the site boundaries are capable of providing a level of containment that prevents sprawl; and
- Would accord with the existing semi-urban character of the site, containing as it does many urbanised features and surrounded in its entirety by development and existing transport infrastructure.
The extent of the impacts on Green Belt purposes could be reduced

2.18 Locating growth on the site would limit impacts upon wider Green Belt locations which perform a strategic function within the Borough. The proposals on the Site have been prepared on the basis of a landscape led masterplan that ensures the development of the site responds to its current context, whilst respecting longstanding landscape features on the site. It is surrounded by strong defensible boundaries which reduces any impact on Green Belt outside of the allocation.

2.19 In conclusion, there are exceptional circumstances that would justify the release of land West of Thorpe Lea Road from its Green Belt designation.

Question 6.3 - Is each of the allocated sites viable and likely to be delivered within the expected timescale? Does the evidence, including any up-to-date information, support the housing trajectory for the individual sites?

2.20 The housing trajectory is a snapshot in time; however, the technical analysis and assessment which has already taken place for the site indicates that the identified timescale of 2019-2024 is appropriate. A degree of flexibility by the Council to respond to changing markets which could impact viability should be provided.

Question 6.4 - Taking account of each of the Policies SL2-SL18, are the specific requirements for development of the sites justified, consistent with national planning policy, and likely to be effective? And in particular, do they make sound provisions for the number and types of dwellings, pitches for Gypsies and Travellers, the range of infrastructure required, flood protection, acceptable noise standards and air quality, and protection and enhancement of the natural environment?

2.21 In accordance with national policies and guidance, the evidence base that supports the plan sets out clear, logical and unequivocal evidence as to the suitability, availability and deliverability of the identified sites. With specific reference to SL8, the Local Plan evidence base and subsequent work undertaken by Muse in pre-application discussions with the Council and key local stakeholders confirms:

- That the site is deliverable and capable of being developed for the form of development proposed in the Policy;
- The proposed scheme does not give rise to adverse impacts on human health from noise/air quality from the M25 through the integration of design features and layouts that provide mitigation for the site and wider area;
- That account is taken of TPO 98 and a scheme of landscaping and vegetation is proposed that will secure a pleasant and green aspect for the site and achieve biodiversity gains;
- That the opportunities for the delivery of safe and attractive links to public rights of way are maximised;
- That the scheme includes sufficient mitigation to minimise the effect of development on the local road network and the provision of contributions to the wider sustainable transport network;
That the scheme makes appropriate provision for contributions to local services and facilities, as relevant, to the proposed development and in accordance with the relevant regulations;

That the scheme is supported by the relevant ecological and environmental assessments;

That the scheme provides sufficient infrastructure to support the level and form of development proposed;

The site is accessible and has access to a good range of local facilities and services;

That the site can be effectively drained without increasing flood risk within and beyond the site boundary; and

That, in the context of the Green Belt, the allocation of the site:

Would not result in the merging of neighbouring towns as the parcel of land performs weakly against this function;

Would not impact on the perceived sense of separation between settlements as it makes no discernible contribution to separation;

Is justified by the existence of strong, defensible long-term Green Belt boundaries;

Would not result in sprawl as the site boundaries are capable of providing a level of containment that prevents sprawl; and

Would accord with the existing semi-urban character of the site, containing as it does many urbanised features and surrounded in its entirety by development and existing transport infrastructure.

3 CONCLUSION

3.1 Technical analysis and assessment has already taken place for allocation SL8. A site layout has been achieved which has taken into consideration the constraints across the site and sought to meet all requirements of the allocation. Within the parameters of the larger part of the allocation (land within Muse ownership) and in line with relevant policy requirements, the site is able to achieve 220 dwellings and 2 traveller pitches. In the context of SL8, the Council has adequately justified and evidenced its Local Plan. Therefore the Local Plan is sound. The application is anticipated to be submitted imminently and would therefore be delivered within the identified timescale 2019-2024.