HEARING STATEMENT TO THE RUNNYMEDE 2030 LOCAL PLAN EXAMINATION – MATTER 6

With reference to previous representations made on behalf of Simco Homes in relation to Land off Rosemary Lane, Thorpe.

1.0 Introduction

1.1 The following statement has been prepared by Coda Planning Ltd on behalf of Simco Homes (‘SH’) in support of our participation in the Runnymede 2030 Local Plan Examination Stage 2 Hearing Sessions relating to Main Matter 6.

1.2 As previously established, various representations have already been made on behalf of SH relating to the site to which their interest relates (SLAA ID 32, as referred to in Appendix B of the submission plan) throughout the Local Plan consultation process. These have broadly established that:

- The approach towards dealing with the significant constraint of the Borough’s Green Belt is now much more positive, partly as a result of the underlying work in the evidence base to assess and review different areas of the Green Belt.

- As a result of this the proposed amendments to the Green Belt boundary will serve to ensure longer-term protection of functional areas of the Green Belt as well as help to fulfil the Borough’s statutory obligations as a Local Planning Authority.

- More broadly but with particular reference to the subject site, it has been established that further site-specific analysis and modifications must be undertaken to ensure maximum appropriate efficiency is achieved when it comes to Green Belt release.

- As a result of this understanding it has been demonstrated that the subject site has a higher capacity (up to 83 dwellings) than is currently suggested by the LPA (and separately indicated by the Thorpe Neighbourhood Forum) in Appendix B of the submitted Local Plan.

1.3 Furthermore, our attendance at the Stage 1 Hearing Sessions included a certain amount of discussion in relation to Thorpe and various related topics with relevance to the site. It is considered that these discussions established a general consensus of position with the LPA that the particular site in question - as part of the wider Thorpe Village - should be released from the Green Belt, and that within that context the site in question is suitable to accommodate a certain amount of sustainable development.
2.0 Statement

2.1.0 Matter 6 – Other Allocations for Housing and Mixed Uses (Policies SD3, SL2-SL18 and supporting text – with specific regard to 6.5 of examination document ID10)

2.1.1 Point 6.5 of examination document ID10 (as updated 08/01/19) raises a number of questions specifically relating to the settlement of Thorpe and the Plan’s current intended approach towards its proposed removal from the Green Belt. These questions are dealt with in turn below.

2.2.0 ‘With regard to paragraph 5.30 of the Plan and the proposed changes to the Policies Map, are there exceptional circumstances for the removal of Thorpe Village from the Green Belt?’

2.2.1 As exhaustively set out within the Plan’s evidence base it is very strongly considered that exceptional circumstances exist justifying the removal of Thorpe Village from the Green Belt. Specifically, the LPA’s Exceptional Circumstances paper (January 2018) serves as culmination of the various Green Belt Review and associated Technical and Villages Review documents, explaining the implications of their conclusions.

2.2.2 These implications must be seen within the context of ‘exceptional circumstances’ as described in paragraph 136 of the Framework – being the only circumstances in which, where ‘fully evidenced and justified’, Green Belt boundaries may be altered. There is no NPPF or PPG definition of exceptional circumstances, but guidance is available through case law and can be gleaned through court judgements.

2.2.3 In the case of Calverton Parish Council v Greater Nottingham Councils [2015] a number of matters are identified in order to ascertain whether exceptional circumstances exist and collectively these form a mechanism through which an assessment can be made. These matters are:

- The acuteness/intensity of the objectively assessed need (matters of degree may be important);
- the inherent constraints on supply/availability of land *prima facie* suitable for sustainable development;
- the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
• the nature and extent of the harm to the Green Belt (or those parts of it which would be lost) should its boundaries be altered; and
• the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.

2.2.4 The evidence base documents relevant to the issue of exceptional circumstances, as previously referred to, thoroughly explain the way in which these matters are fulfilled in this circumstance. SH do not seek to repeat the position established by the LPA in this regard, but would assert that the evidence base makes it clear that:

• The OAN is extremely acute/intense, particularly insofar as it relates to and is impacted by the need for affordable housing;
• the constraints on the supply/availability of land suitable for sustainable development are severe;
• the difficulties in achieving sustainable development without impinging on the Green Belt are therefore also severe;
• the nature and extent of the harm to the Green Belt resulting from the proposed changes is relatively negligible; and
• the extent to which this impacts on the purposes of the Green Belt can be reasonably ameliorated and/or reduced to an acceptably low level.

2.2.5 Further to this, with specific regard to the removal of Thorpe Village, within the context of the mechanism set out above it is considered that while the former points are general in their relevance to the whole Plan area, the latter points can be expanded upon with relation to the settlement in question. That is to say that it is also clear from the evidence base that the proposed changes to the Green Belt around Thorpe will not cause any notable material harm to its purposes.

2.2.6 It is evident that this is the case from the Green Belt Village Review (Stage 2 Update Report 2018) document. This sets out in very fine detail an assessment of numerous different areas of the settlement in terms of the role that each individual ‘map tile’ plays as part of the Green Belt. In light of this assessment various options are presented for defining the settlement boundary in these different areas. Taking ‘map tile 6’ as a case in point (this covering the SH land off Rosemary Lane in SLAA ID 32), extensive analysis of the role that the parcel of land plays in fulfilling Green Belt purposes leads to these options, which are then assessed in turn to determine which option leads to the ‘best’
outcome having regard once again to Green Belt purposes. In the case of map tile 6 and the land in question it is the entirely appropriate conclusion of the LPA that placing the boundary along the line of the Thorpe Bypass is the best possible outcome. This is due to the limited (and already eroded) role that the land contributes to Green Belt purposes, and the permanence and defensibility that this new boundary would create.

2.2.7 It is considered that this process is in fact unusually thorough in the depth of detailed assessment that has been undertaken. As such it represents an extremely robust approach to determining the impacts of the proposed boundaries on the purposes of the Green Belt. Therefore, in line with the more general matters set out within the relevant evidence base document(s), it must be concluded that exceptional circumstances do exist for removing Thorpe from the Green Belt.

2.2.8 Moreover, further weight behind this conclusion can be seen in the fact of Thorpe’s current policy status, which defines it as a separate ‘Rural Settlement in the Green Belt’ (Local Plan Saved Policies GB2). This represents an undesirable midpoint between complete protection by virtue of Green Belt status and clearer-cut policy by virtue of removal from the Green Belt. The proposed removal addresses this situation and creates a defined boundary that, as described above and detailed in the LPA’s evidence base, more accurately responds to both the Green Belt purposes and the need for a certain amount of sustainable development in appropriate locations around the periphery of the village.

2.3.0 ‘In the light of NPPF (July 2018) and paragraph 136 in particular, should the Plan be modified to clarify that detailed amendments to the Green Belt boundary of Thorpe Village may be brought forward through the neighbourhood plan, and if so, how should the scope of any proposed boundary changes be guided by the Plan?’

2.3.1 It is not considered that it would be appropriate to modify the Plan to clarify that detailed amendments to the Green Belt boundary of Thorpe Village may be brought forward through the neighbourhood plan. It is very strongly asserted that these amendments should continue to be brought forward through the Plan itself.

2.3.2 Para 136 of the 2018 Framework is clear in setting out that ‘detailed amendments to [Green Belt] boundaries may be made through non-strategic policies, including neighbourhood plans’ (author’s emphasis). It is not a requirement to do this and it is asserted that to do so in this case would present no benefit to the plan-making process of either the Plan itself or the Thorpe neighbourhood plan. Equally it is the case that if such amendments were considered through the neighbourhood plan, they must by necessity be
2.3.3 Notwithstanding the above, if it is found by the Inspector that such modifications should be made, then clearly the scope of any proposed boundary changes should be guided almost entirely by the Plan. As outlined in the previous paragraph, the changes as currently proposed are the result of extensive assessment as set out within the evidence base and they therefore represent an outcome that is in line with guidance. They are therefore sound in that they establish the best –‘best’ in terms of the Green Belt purposes and achieving sustainable development in the context of exceptional circumstances- boundaries to the village of Thorpe. This assessment that is set out within the evidence base is clear in its comparison of various options relating to individual parcels of land surrounding the settlement. The results that are drawn from this process thus represent an accurate outcome that is therefore asserted to be objectively ‘correct’. Given this, and to reiterate the point previously made, it is not considered to be the case that any different conclusions could reasonably be reached as a result of bringing forward boundary amendments through the neighbourhood plan rather than the Plan itself. As a result it would not only be unnecessary, but it would be a meaningless exercise as any reasonable and objective assessment of the evidence must reach the same conclusions.

2.3.4 Due to this it is further considered that such a modification would represent a perversion of the Local Plan process undertaken thus far by unnecessarily detaching the evidence relating to the Thorpe Green Belt boundary from its potential implications.

2.3.5 Moreover, it is considered that any change in this regard would represent a ‘main’ modification, as it would be strategic in nature and fundamental to the resultant form of the Green Belt in the Borough following adoption of the Plan. In this context, as set out by PINS’ procedural practice guidance, such main modifications to Local Plans are required only where there is an issue of soundness or legal compliance. As per previous discussion in this statement, previous representations on behalf of SH, and indeed as per the submitted Plan, there is no issue of soundness or legal compliance in relation to this particular matter (i.e. the details of the removal of Thorpe Village from the Green Belt being undertaken through the Plan itself) and therefore no such modification is required, nor should it be sought.
2.4.0 ‘Would it be justified to make any consequential modifications to the Plan, for example, to provide guidance for other neighbourhood plans that may be brought forward?’

2.4.1 With regard to this final query within point 6.5 of Matter 6, and pursuant to the above discussion, it is considered that it would not be at all justified to make any consequential modifications to the Plan.