

# Examination of Runnymede Local Plan

## Matter 6: Other Allocations for Housing and Mixed Uses

**on behalf of Chertsey Parklands LLP**

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## 1.0 Introduction

- 1.1 The Inspector, in advance of the Runnymede Local Plan Stage 2 Hearing Sessions, has posed a series of Matters of Questions. Matter 6 relates to *'Other Allocations for Housing and Mixed Uses'* to include policies SD3, SL2-SL18 and supporting text.
- 1.2 Chertsey Parklands LLP control land at Chertsey Bittams Parcel D, Oracle Park (also known as 'Parklands') ('the Site'). The Site is allocated for development in the 'Runnymede 2030 Submission Local Plan' ('the Submission Local Plan') under Policy SL17. On behalf of Chertsey Parklands LLP, we respond to relevant questions below in order to provide further clarity and additional detail for the benefit of the Inspector.

## **2.0 Q6.1 Have the other site allocations in Policy SD3 and detailed Policies SL2-SL18 emerged from a thorough, objective assessment of all potential sites, including review of Green Belt boundaries, sustainability appraisal and Habitats Regulations 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?**

2.1 Underpinning the Submission Local Plan and to assist in the selection of site allocations SD3 and SL2-SL18, the Council has prepared an extensive and detailed suite of evidence base documents. This enables a thorough and objective assessment of all potential sites across a range of topics but in particular, includes:

#### **Green Belt**

- Green Belt Review Part One (December 2014) **(SD\_004L)**;
- Green Belt Review Part Two (March 2017) **(SD\_004Q)**;
- Green Belt Boundary Technical Review (March 2016) **(SD\_004A)**.

#### **Sustainability Appraisal**

- Sustainability Appraisal Scoping Report (September 2014) **(SD\_018A)**;
- Sustainability Appraisal Report (May 2017) **(SD\_018G)**;
- Sustainability Appraisal Regulation 19 (January 2018) **(SD\_018N)**;
- Sustainability Appraisal Addendum Regulation 19 (May 2018) **(SD\_018P)**.

#### **Habitats Regulations**

- Habitats Regulations Assessment (July 2016) **(SD\_017A)**;
- Habitats Regulations Assessment (May 2017) **(SD\_017G)**;

- Habitats Regulations Assessment (December 2017) **(SD\_017M)**;
- Runnymede Local Plan Habitats Regulations Assessment Main Report (May 2018) **(SD\_017P)**.

2.2 Chertsey Parklands LLP is of the view that the Council has prepared a suitably comprehensive and robust evidence base to inform the Submission Local Plan and the site allocation policies.

2.3 Furthermore, it is noted that the Council's 'Site Selection Methodology' Version 2 (May 2017) **(SD\_012A)** outlines the particular approach applied to the selection of sites in this case. This has been informed by the methodology used in the preparation of numerous other Local Plans (including Blaby, Ryedale, Selby, South Staffordshire and West Berkshire). Building upon that research, the Council has developed an eight stage approach to site selection in Runnymede as set out below:

**Stage 1:** An initial sift of sites;

**Stage 2:** Undertake SA/SEA of all sites carried forward from Stage 1 as an independent assessment;

**Stage 3:** Assessment of accessibility & compare sites against significant non-absolute constraints as identified in the Green Belt Reviews;

**Stage 4:** Compare sites against non-significant and non-absolute constraints identified in the Green Belt Reviews;

**Stage 5:** Assess sites taken forward from stages 1, 3 & 4 with findings of the Green Belt Reviews;

**Stage 6:** Consider the performance of sites in this assessment and the Sustainability Appraisal and recommend sites for allocation;

**Stage 7:** Deliverability of sites taken forward from stage 6;

**Stage 8:** Consider capacity of sites taken forward from stage 7.

2.4 We note that the methodology outlined above includes reference to relevant components of the Council's evidence base, including the Green Belt Review (Parts 1 and 2), Sustainability Appraisal and Habitats Regulations. It also has regard to absolute constraints, deliverability and accessibility.

2.5 In that regard, the 'National Planning Policy Framework' (2012) ('The Framework') outlines at Paragraph 158 that:

*'Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.'*

2.6 Planning Practice Guidance outlines further detail regarding the preparation of a suitable evidence base, but it specifically suggests that:

*'Policies need to be justified. Evidence to underpin policies can be taken from a wide variety of sources, including the Authority Monitoring Report and planning application and appeal decisions. Strategic policy-making authorities will need to consider carefully the need to commission evidence that will add delay and cost to plan production. Wherever possible, authorities may wish to prepare evidence in-house or jointly to speed up the process, and obtain best value for the taxpayer'* (Paragraph: 031 Reference ID: 61-031-20180913).

2.7 In light of the above, Chertsey Parklands LLP considers that the selected allocations are supported by relevant and up-to-date evidence whilst the specific methodology used in the selection of sites is considered to be entirely appropriate and, as set out in more detail below, applied in a consistent way.

### 3.0 b) Is it clear why the Council has decided to allocate the specific sites and not others?

- 3.1 Within the 'Site Selection Methodology' Final Version (**SD\_012B**), the Council undertakes in full the exercise outlined above for each of the sites promoted and contained in the 'Strategic Land Availability Assessment' (SLAA). Following this exercise, the Council has also undertaken an assessment of capacity to establish the amount of development that each site could accommodate. This work is set out within the 'Final Site Capacity Analysis' (December 2017) (**SD\_011A**).
- 3.2 Having considered each of the sites contained within the SLAA, the 'Site Selection Methodology Assessment' Final Version ultimately concludes at Paragraph 5.21 that 20 housing sites and 1 employment site are suitable for allocation. This includes the Parklands site (SLAA site 156).
- 3.3 The Council, by way of justification to draft Policy SD3 outlines at Paragraph 5.42 of the Submission Local Plan that:

*'The Council considers that the sites allocated for development in Policy SD3 are the most suitable when considered against the alternatives appraised through a robust site selection process and Sustainability Appraisal. They are considered to offer the best opportunity to achieve sustainable development and the delivery of the spatial development strategy.'*

- 3.4 Chertsey Parklands LLP fundamentally agrees and considers that the rationale for the allocation of sites is entirely clear, logical and consistent.

## 4.0 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?

4.1 The Council sets out its spatial vision for the Borough at Paragraph 5.6 of the Submission Local Plan outlining that, amongst other things, it will:

- balance competing environmental, social and economic pressures by delivering sustainable growth;
- deliver a wide range of housing including for those with specialist needs and the necessary infrastructure to support sustainable communities;
- achieve a high quality and inclusive built environment through place shaping.

4.2 It should be noted that the 'Site Selection Methodology Assessment' Final Version (**SD\_012B**) prepared in support of the Local Plan establishes that the journey time and access to centres is good for the Parklands site. The submitted planning application ref. RU.17/1749 for up to 200 residential dwellings on this Site also shows that it would deliver housing across a variety of types and tenures achieving a high quality and inclusive built environment. In that regard, development of the site would accord fully with the Plan's spatial vision and objectives.

### *Overall Housing Numbers*

4.3 In terms of national policy, the Framework outlines at Paragraph 47 that Local Plans should meet the full, objectively assessed needs (OAN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework.

4.4 The Runnymede-Spelthorne SHMA sets out that the OAN for Runnymede is 7,507 dwellings over the period 2015-2030. The Submission Local Plan sets out a supply of 7,480 dwellings over the plan period (at an average of 498 dpa). It is therefore clear that even with the proposed release of land from the Green Belt (including the Parklands allocation) the Submission Local Plan would not deliver the full OAN for the borough.

- 4.5 The Framework at Paragraph 83 clearly allows Green Belt boundaries to be altered in *'exceptional circumstances'* through the preparation or review of the Local Plan. Consideration should be given to the intended permanence of Green Belt boundaries so that they endure beyond the plan period.
- 4.6 Planning Practice Guidance (PPG) (Paragraph: 045 Reference ID: 3-045-20141006) stresses the importance that Government attaches to protecting the Green Belt but indicates that when considering how to meet the identified need, constraints such as Green Belt **may** restrain the ability of an authority to meet its housing need.
- 4.7 Whilst significant weight should be given to the protection of the Green Belt, Chertsey Parklands LLP considers that greater weight should be given to the need to significantly boost housing supply where it is sustainable to do so and having taken account of how the Green Belt in Runnymede performs against its purposes as well as its overall function.
- 4.8 Amongst other things, the shortfall in meeting development needs therefore constitutes the exceptional circumstances required to alter Green Belt boundaries and release land for development. A failure to allocate sufficient land to meet development needs would of course mean that the Council's spatial vision is not realised and the Plan is in conflict with national planning policy.

#### *Site Specific Issues*

- 4.9 National Policy in the form of the Framework and the PPG also provides guidance relevant to the determination of a planning application, covering issues such as:
- promoting sustainable transport;
  - requiring good design;
  - conserving and enhancing the natural environment;
  - conserving and enhancing the historic environment.
- 4.10 The 'Final Site Capacity Analysis' (December 2017) (**SD\_011A**) outlines that the Site:
- can accommodate up to 200 dwellings;
  - is suitable for a higher density development reflective of the character of the nearby St. Peter's Hospital;

- would lend itself to flatted development rather than housing.

4.11 The Site in this case previously contained a substantial office building whilst planning permission was granted under application ref. RU.14/0085 for development comprising two care homes. The Site therefore constitutes previously developed land and as such, development would accord with the aims of the Framework, including the Core Principle at Paragraph 17 that planning should:

*‘encourage the effective use of land that has been previously developed (brownfield land), provided it is not of high ecological value’.*

4.12 The ‘Sustainability Appraisal Report Addendum Annex B’ (**SD\_018R**) records a significant positive impact in terms of providing affordable new homes as well as on biodiversity. Further positive effects are noted in terms of reducing health inequalities and maintaining economic growth. There are no other issues that would preclude development of the Site in the manner proposed and the development would therefore fully accord with National Policy.

## 5.0 Q6.2 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?

5.1 The Council's Exceptional Circumstances Paper (January 2018 with April 2018 addendum) **(SD\_004Y)** sets out the particular circumstances relied upon to support an amendment to Green Belt boundaries in this case, namely:

- i. the lack of suitable available and achievable sites in the existing urban area;
- ii. the significant level of constraints to development which exist in the borough;
- iii. the significant housing need faced by Runnymede over the Local Plan period; and
- iv. the conclusions of the from duty to cooperate discussions which demonstrate that any unmet housing need from Runnymede is unlikely to be met in neighbouring or nearby Local Authority Areas.

5.2 Against that context, the Parklands site was specifically assessed in the 'Exceptional Circumstances Paper' Addendum from April 2018. The relevant Proforma is attached at Appendix 1 but it outlines that this particular site demonstrates the relevant exceptional circumstances by virtue of the following:

- The need for housing – to provide sufficient land to achieve the full Objectively Assessed Housing Need and to meet identified needs for gypsies and travellers; and
- The need to ensure that the Green Belt boundary is defensible and logical in the light of changes which have occurred since drawing the Green Belt boundary in 1986.

5.3 In that regard, and as set out in the attached pro-forma, Chertsey Parklands LLP would reiterate that the Site in this case constitutes previously developed land. The amended Green Belt boundaries would be strong and defensible, comprising St Peter's Way to the south, the A320 to the east and existing residential development to the north and east. As such, Chertsey Parklands LLP is clear that at both the borough wide level, and at the site specific level, the necessary exceptional circumstances have been demonstrated to justify the amendment of Green Belt boundaries in this case.

## **6.0 Q6.3 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?**

- 6.1 The Submission Local Plan, at Policy SD3, includes a suggested phasing for the Parklands site of 2019–2022. This is reinforced by the site specific policy (SL17) which suggests under ‘timing’ that development would come forward between 2019 and 2022 contingent on delivery of mitigation to the A320.
- 6.2 For clarity, planning application ref. RU.17/1749 for up to 200 dwellings has been lodged with the Council and is awaiting determination at the earliest opportunity. Discussions with potential developers are well advanced and the proposed housing would be delivered without delay.

## **7.0 Q6.4 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?**

7.1 The Parklands site is considered in the 'Final Site Capacity Analysis' (**SD\_011A**) where it outlines that it could come forward for higher density development than currently exists. It notes that a 200 unit scheme would lend itself to flatted development and that this type or intensity of development is present at the St Peter's Hospital complex 100m to the west on the opposite side of the A320.

7.2 The 'same document is also clear that the Site would not be expected to provide other specialist housing types when it states at Paragraph 3.5 that:

*"Given the C2 use already on site and size remaining, it is considered that the site would not be suitable for other specialist housing types'.*

7.3 Further criteria within the draft allocation itself deal with issues such as infrastructure, flood protection, acceptable noise standards and air quality as well as protection and enhancement of the natural environment.

7.4 In particular, the policy recognises the ecological and landscape constraints of the Site and states that development should take account of protected trees and boundary vegetation in the design, layout and landscaping of the site. The policy also requires net gains in biodiversity to be demonstrated through appropriate habitat / species surveys. It further requires that development avoid impact on the Thames Basin Heaths SPA through an approved scheme of mitigation.

7.5 In terms of transport, the policy requires that development improves and maximises opportunities safe and attractive links to the existing public rights of way network. It also requires a site specific Travel Plan and Transport Assessment.

- 7.6 Air Quality modelling outlines that no relevant air quality objectives would be exceeded by development in the emerging Local Plan.
- 7.7 Given the above, Chertsey Parklands LLP is clear that the specific provisions of draft policy SL17 are sound in that they are justified, consistent with national policy and effective.

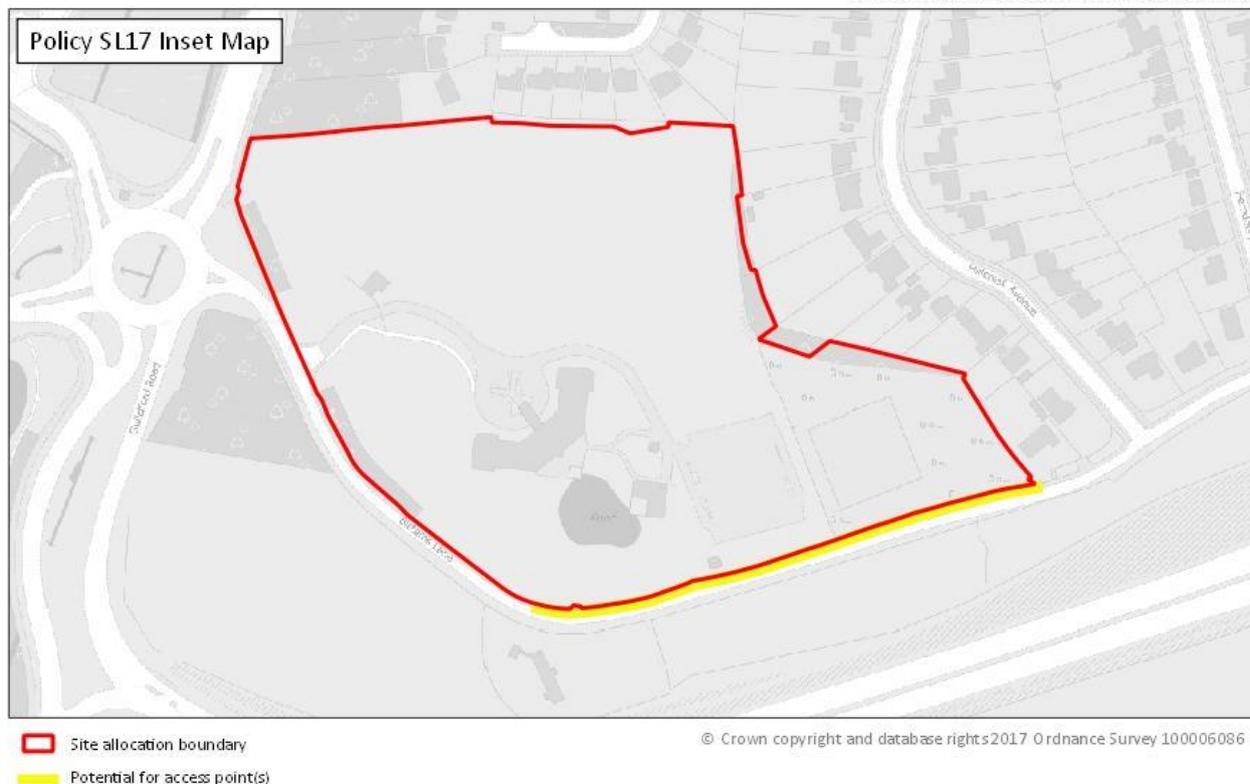
## **Appendix 1 – Final Exceptional Circumstances Paper – Chertsey Bittams Parcel D Proforma**

**14) SL17 Housing Allocation: Parcel D (Oracle Park), Chertsey**

Site area:

- in hectares: 4.11ha
- as a percentage of total Green Belt in current plan: 0.07%

NOT TO SCALE: FOR ILLUSTRATIVE PURPOSES ONLY



| <b>Parcel D, Chertsey Bittams</b>  |   |
|--|---|
| <b>Green Belt Review Part 1 General Area Number</b>  | General Area 25   |
| <b>Green Belt Review Part 2 Sub Area Number</b>  | Sub Area 36   |
| <b>Will the removal of the site have an impact on the purposes of the Green Belt?</b>  | <p><u>Green Belt Review Part 1</u><br/>As identified in Green Belt Review Part 1 the further refined land surrounds Chertsey South and could form a natural extension area surrounding this development. The durable and permanent boundaries for General Area 25 (M25, A320 and A317) would provide strong barriers against wider expansion into the Green Belt and thus prevent further sprawl.</p>                                     |
| <b>Is it possible to define site boundaries clearly, using physical features that are readily recognisable and likely to be permanent?</b> | <p>As part of a wider strategic gap, development of this land would not lead to the merger of settlements. Existing developments within General Area 25 are such that it already has a semi-urban character rather than open countryside.</p> <p><u>Green Belt Review Part 2</u><br/>As highlighted in Green Belt Review Part 2 Purposes Assessment there is limited perceptual connection with the surrounding green belt due to low</p> |

|   |   |
|---|---|
|   | <p>lying topography and dense woodland, and Bittams Lane to the south provides further physical severance from the wider Green Belt to the south. The boundary between Sub Area 36 and Chertsey (Chertsey South) is formed of detached homes with irregular gardens and there are no other easily identifiable or defensible features. The land parcel is an important barrier to sprawl.</p> <p>Sub Area 36 forms a small part of the less essential gap between the settlements of Chertsey (Chertsey South) and Ottershaw. The gap is limited in scale, however due to the enclosed and infill nature of Sub Area 36, it does not play a significant role in the swathe of green belt between settlements. Overall Sub Area 36 is semi-urban in character.</p> <p>The wider parcel is identified as performing strongly against Purpose 1 preventing encroachment into an area of open countryside, and in some areas prevents sprawl in the absence of existing defensible boundaries. It is noted at the local level however that Sub Area 36 is enclosed by the settlement of Chertsey (Chertsey South) and therefore plays an additional role in preventing sprawl in the absence of defensible boundaries.</p> <p>Although the gap between settlements within the wider parcel are small in scale, the enclosed nature of Sub Area 36 limits the further erosion of the gap and overall makes a small contribution into separation.</p> <p>The semi-urban character of Sub Area 36 and strong urbanising influences diminish the overall rurality and sense of openness.</p> <p>Overall it is judged that this area plays a limited role with respect to the wider strategic Green Belt and its loss would not harm its overall integrity and would contribute to infill development.</p> |
| <p><b>Site Selection Methodology Assessment</b></p> | <p>Site accessibility is generally good to service centres but mixed to local facilities with poorer access to primary education.</p>   |
| <p><b>Viability Assessment</b></p>                  | <p>The site has been allocated to provide a minimum of 125 net additional C3 dwellings and would include the retention of the existing 93 bed care home on the site. This amount and type of development has been confirmed viable through the whole plan viability assessment and would help to meet the Council's identified needs for both market and affordable housing.</p>  |
| <p><b>Local Exceptional Circumstances</b></p>       | <p>Within the context of the heavily constrained nature of the Borough, and the inability of other local authorities to assist with meeting any unmet housing needs from Runnymede. In accordance with the Council's adopted site selection methodology the removal of this parcel of land is considered to demonstrate Exceptional Circumstances of:</p> <ul style="list-style-type: none"> <li>• The need for housing – to provide sufficient land to achieve the full Objectively Assessed Housing Need and to meet identified needs for gypsies and travellers; and</li> <li>• To need to ensure that the Green Belt boundary is defensible and logical in the light of changes which have occurred since drawing the Green Belt boundary in 1986.</li> </ul>   |

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