RUNNYMEDE 2030 LP EXAMINATION

MATTER 6: OTHER ALLOCATIONS FOR HOUSING AND MIXED USE

STATEMENT ON BEHALF OF ST EDWARD
CONTENTS:

1. INTRODUCTION 1
2. MATTER 6.1 2
3. MATTER 6.2 6
4. MATTER 6.3 7
5. MATTER 6.4 9

Appendix 1 - SSMA Site Assessments
1. **Introduction**

1.1 This Statement is submitted on behalf of St Edward, and follows representations made on their behalf throughout the emerging Local Plan process.

1.2 St Edward are a joint venture company owned by the Prudential Assurance Company and Berkeley and have an interest in an omission site at North East Ottershaw (referred to as Site 46 in the SLAA). Representations have been made previously setting out the merits of the site, but this Statement focusses only upon the specific questions asked by the Inspector.
2. Matter 6.1

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 HRA where necessary?

2.1 It is strongly considered that the site allocations have not emerged through an objective assessment of all potential sites. The reasons for this can be explained in response to the Inspector’s questions, as follows;

6.1 (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 The methodology within the Green Belt Review Part 2 (GBRP2) was considered to be suitable. It focussed upon Green Belt matters, most notably how the various parcels performed against the Green Belt purposes, as set out in the NPPF, and hence was consistent with national guidance on the matter.

2.3 The GBRP2 identified 45 sub-areas that were put forward for further consideration on the basis that their subsequent allocation could be justified in terms of their impact upon the Green Belt. Two of the 45 areas recommended (25 and 27) lie within the red line area identified as land at NE Ottershaw (SLAA site 46).

2.4 Objection is made to how the Council subsequently considered those 45 sub areas before identifying their proposed allocations in the Local Plan. In particular it is suggested that inconsistencies arose within the Council’s Site Selection and Methodology Assessment (Dec 2017) that have undermined the plan-making process. This is demonstrated by the Council’s consideration of land at NE Ottershaw.

2.5 The parcels of NE Ottershaw upon which development is proposed were 25 and 27 in the GBRP2. These were identified as only having a moderate overall score against the Green Belt purposes, as were the majority of Green Belt sites that have subsequently been identified for allocation by the Council. NE Ottershaw (area 25) had an identical combined score (of 6) as the subsequent allocations at St Peters Hospital (SL13), Ottershaw East (SL12) and Pycroft Rd, Chertsey (SL6)
and had a lower/better score than the subsequently allocated sites at SL14, 15, 16 and 18 at Chertsey.

2.6 Due to the NE Ottershaw area’s scores in the GBRP2 they were subsequently recommended to the Council as 2 of the 45 areas for further consideration. In other words, such sites had clearly been identified as not being the best performing sites in the Green Belt, and their allocation for development would not detract significantly from the Green Belt.

2.7 At Stage 3 of the SSMA, North East Ottershaw (GBRP2 area 25) is categorised as ‘Medium-High’ (when High is best) in terms of its Accessibility Performance, and ‘Low-Medium’ (when Low is best) in terms of Constraints. For reasons set out in previous submissions by St Edward, the SSMA needs to be amended under the Stage 3 Assessment at Table 5.1, to refer to NE Ottershaw as recording a ‘Low’ score against constraints.

2.8 Such scoring ranks the site as more appropriate for development than the vast majority of the others being considered at Stage 3. Of considerable relevance, it also ranks the site as more appropriate than the vast majority of the subsequently allocated sites at Policy SD3. Appendix 1 of this Statement illustrates this and shows amongst other things that, of the SD3 allocations which have been similarly assessed, 7 of the allocated sites have weaker accessibility and more constraints than North East Ottershaw (SL2, SL5, SL8, SL9, SL10, SL15 and SL16).

2.9 Even if the Council’s currently set out categorisation of the site having a Low-Medium score against constraints is applied, it can still be seen at Appendix 1 to be one of the most appropriate for development when compared against the other allocated sites.

2.10 The site was found acceptable in Stage 4 and then considered as part of Stage 5 of the SSMA, which is described as considering how the sites perform in terms of Green Belt purposes, as informed by the Runnymede Green Belt Review Parts 1 and 2. As mentioned above, the site at NE Ottershaw was considered in great detail by the GBRP2, against the Green Belt purposes, and its release from the Green Belt was found to be appropriate in such terms. It is therefore unreasonable and inconsistent that the Council have chosen to dismiss the site at Stage 5 of the SSMA due to it not representing a rounding-off of the urban area
pushing settlement boundaries north beyond existing defensible GB boundaries and physically closing gap between Ottershaw/Chertsey. Greater weight attached to protection of Green Belt’ (Table 5.4 of SSMA)

2.11 Submissions have been made on behalf of St Edward entitled ‘Consideration of Land at NE Ottershaw against proposed allocations at SD3’ which explains why the Council’s above reason for dismissal of the site is not consistent with their own evidence base and national guidance. This will not be repeated here, but it is considered relevant to highlight the inconsistency, and to note the Council’s recognition at p.256 of the SSMA that ‘this is one of a very few instances where the Council disagrees with Arup’s conclusions’. For reasons explained within previous submissions, such disagreement is not considered to be justified.

2.12 The purpose of the GBRP2 was to assess the performance of more detailed sites against the purposes of the Green Belt. NE Ottershaw was found by the GBRP2 to be appropriate for development in this respect, yet the Council’s subsequent SSMA has considered it inappropriate for allocation due to its impact on Green Belt purposes. It is an inconsistent approach, and one that results in less appropriate sites passing through Stage 5 of the SSMA. It is questionable whether the same consideration has been given to other Green Belt allocations.

2.13 Proposed allocations at Englefield Green, Egham, Virginia Water, Chertsey and Ottershaw itself, cannot reasonably be described as ‘rounding off’ development. This does not imply that the allocations are inappropriate but simply that the Council have taken an inconsistent approach on the matter, and it is for this reason only that land at North East Ottershaw did not reach Stage 5 of the SSMA, from which it would have been recommended for allocation.

2.14 It would be understandable if a site considered to be appropriate for release by the GBRP2 was subsequently not allocated due to other planning considerations which form part of the overall balance. With regards other planning considerations, the NE Ottershaw allocation would be able to contribute to the provision of SANG, playing pitches and Highways Infrastructure, but the SSMA gave no weight to such benefits, which is considered to be a further weakness of the document when attempting to identify the most appropriate sites.

2.15 The approach by the Council is unreasonable, inconsistent, ignores the Council’s own evidence base, and has resulted in a site which has been shown to be one of
the most sustainable options for development across the Borough, not being identified within the Draft Local Plan. The approach taken has therefore fundamentally undermined the plan-making process.

2.16 Consideration has been given to the Council’s 2018 Sustainability Appraisal (SA) and comparison of sites within that. Significant question marks are raised with some of the findings of the report;

2.17 The SA identifies Objective 1 as being to conserve and enhance biodiversity, habitats and species. The majority of allocated sites are recorded as scoring ++, (significant positive), against this objective. However, the majority of such allocated sites are providing no on-site SANG, which is highlighted within the Council’s IDP as a critical infrastructure requirement. Whilst it might be possible to conserve biodiversity, habitats and species without such provision, the enhancement of them, which surely would be required for a ‘significant positive’ score, can only be achieved through a scale of improvement that incorporates a SANG, given the critical need for them expressed in the Council’s own Evidence Base. The approach taken by the Council is inconsistent and has resulted in sites such as NE Ottershaw, which can provide a SANG and hence achieve Objective 1, not being scored reasonably (−).

2.18 Further inconsistency is highlighted between separate SA documents. For example, the site at SL3 (Hanworth Lane, Chertsey, SLAA site 48), which adjoins an SNCl, (so comparable with part of the developable area of NE Ottershaw), scores a minor negative in Tables of the SA (3A) against SA Objective 1. Yet, when assessed against the same impact in the SA (3B), the site scores significantly positive! For clarification, this is a site that does not include any SANG provision within it, so offers notably less in this respect than NE Ottershaw, yet is scored higher.

2.19 Objective 2 of the SA is to protect and improve the health and well-being of the population and reduce inequalities in health. It is considered relevant that the IDP highlights a deficiency in playing pitch provision over the Plan period, which would clearly have a direct positive impact upon such an objective. However, all of the allocated sites score positively against this objective despite only one providing playing pitch provision. A positive score is achieved through simply being able to access off-site facilities. Such an approach appears at odds with the
requirements identified in the IDP, and does not reward those sites which can contribute notably to the improvement of health through on-site facilities, such as land at NE Ottershaw.

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

2.20 No - for reasons explained in response to 6.1(a).

6.1(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?

2.21 It is not considered that the allocation of sites is consistent with the Plan’s objectives and national planning policy because they fail to provide for development that is sustainable through the provision of necessary infrastructure and facilities.

2.22 The vast majority of allocations provide for nothing other than housing, yet it has been shown through previous submissions that additional SANG and playing pitches are necessary for the District over the Plan period, plus works to enable the implementation of the A320 enhancements. The fact that the allocated sites have not responded to such infrastructure needs does fundamentally undermine the plan making process. The additional/alternative allocation of land at NE Ottershaw for development would enable such provision to come forward.

3. Matter 6.2

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

3.1 Other than there being a housing requirement, which the allocations are contributing towards, the specific characteristics of the sites, and proposals associated with them, cannot be said to demonstrate exceptional circumstances.

3.2 None of the allocated Green Belt sites are scored as both ‘High’ in terms of accessibility, and ‘Low’ in terms of Constraints within the SSMA document to
warrant being considered exceptional in terms of those combined characteristics. Similarly, there are no parcel areas within the initial Green Belt Study that fail to meet any of the Green Belt purposes, so sites cannot be considered exceptional in this respect.

3.3 The Council’s IDP highlights requirements in SANG, playing pitch and educational provision, which are not accounted for through the current allocations and associated requirements. Such a shortage of provision would appear to offer an opportunity to contribute to an exceptional circumstance, through a Green Belt site incorporating such provision. Or there may be more local requirements, such as the potential re-provision of a Car Park to support Ottershaw Village Hall, as was raised in the Stage 1 Hearings. However, in the vast majority of cases the Green Belt allocations identified provide nothing but housing and ancillary play space, thereby not addressing the wider infrastructure requirements.

3.4 The concern is highlighted by the Council’s own ‘Exceptional Circumstances Addendum’ document. The document includes a ‘Local Exceptional Circumstance’ when commenting upon each allocated site, but notably this is identical for all allocations other than St Peters Hospital and simply refers to the borough wide need for housing, and the need to ensure a defensible revised Green Belt boundary. It is strongly questioned whether such local circumstances can be described as exceptional, when they are identical across all but one site.

3.5 In order to address the current insufficient exceptional circumstances, Green Belt allocations should contribute to addressing recognised infrastructure requirements, which would be a relevant characteristic to help warrant exceptional circumstances being present. For example, the release of land at NE Ottershaw would be justified through a local exceptional circumstance which would include the provision of SANG, playing pitches, necessary A320 works, and the provision of a re-located car park to serve the Village Hall.

4. Matter 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?
4.1 Reference has already been made to concerns regarding Longcross Garden Village in this respect.

4.2 Delivery at St Peters Hospital (SL13) was expected to have commenced by now, with the trajectory at Appendix 6 of the SLAA indicating 50 dwellings being delivered in 2018/19. Consent has not yet been issued by the Council, making such assumptions unachievable. This will clearly have knock on effects for the subsequent assumed delivery on site also.

4.3 The Council’s SA Addendum (May 18) at Table 3.1 recognises that it is not yet known whether allocations SL12-18 will have negative effects on congestion, to the extent that their allocation may not be justified. They are contingent upon delivery of the A320 mitigation works, when it is not currently clear what mitigation works are required, and whether they can feasibly be undertaken. As an example, Land at East Ottershaw (SL12) is assumed by the Council's trajectory to deliver 50 houses by 2019/20 but will be contingent upon A320 mitigation as explained in the Council’s SA Addendum. It follows that a planning application hasn’t been submitted for the site yet, meaning such assumptions on delivery are clearly unrealistic and will not be achieved. Without understanding mitigation requirements and timescales it is not possible to predict the extent of delay to delivery that is likely.

4.4 With regards allocation SL8 (Thorpe Lea Rd West) submissions have previously been made by St Edward highlighting that there is no agreement from some of the landowners over the availability of part of the site that the Council have assumed will deliver housing. The Council’s website page entitled ‘Allocated Sites and Other Strategic Proposals’ appears to endorse this concern as it refers to an EIA Scoping Opinion being agreed for 200 dwellings on part of the site only. It therefore follows that there is no likelihood of the assumed capacity for SL8 of 250 dwellings being achieved at the site. It is also noted that the Council’s SLAA assumes delivery of 70 dwellings on site by 2019/20. Given that a planning application has not yet been submitted such an assumption is not achievable, thereby indicating both the Council’s assumed capacity and delivery rates are not viable.

4.5 Previous submissions were made by St Edward in response to the Submission Local Plan which challenged the deliverability/capacity of sites at SL6, SL9, IE10
and IE11. Such concerns are still valid given that no evidence has been produced to support the Council’s assumptions.

4.6 Delivery timescales of sites SL6, SL9, SL10, SL12, SL13 and SL17 are also in some doubt given that a developer is not in control of them.

5. Matter 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?

5.1 For reasons set out in other submissions on behalf of St Edward, there is underlying concern that the allocations as a whole do not provide for the range of infrastructure required over the Plan period, notably SANG, playing pitch and education provision as highlighted as being necessary in the IDP. This could be addressed through additional/alternative allocations that do make such provision.

5.2 Specific concern is raised that Allocations SL14-18 all lie within close proximity of a major noise source (M25). A nearby authority (Mole Valley DC) have undertaken a Noise Assessment of the M25, which has resulted in a requirement that dwellings in allocations near to the M25 are sited at least 70 / 100m away from it. Runnymede have not undertaken a Noise Assessment, but if they were to, and it resulted in similar recommendations to that at Mole Valley, the capacity of Allocations SL14-18 would need to be notably reduced.
### Appendix 1 - LP Policy Site Name

<table>
<thead>
<tr>
<th>LP Policy</th>
<th>Site Name</th>
<th>SLAA Site Number</th>
<th>SSMA Assessment of Site Accessibility (Housing) score (when High is best for dev)</th>
<th>SSMA Assessment of Significant Non-Absolute Constraints (Housing) Score (when Low is best for dev)</th>
<th>Green Belt Review Part 2 overall score (sub area) (when weak is best, strong is worst for dev)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy SL2</td>
<td>Housing Allocation at Brox End Nursery, Ottershaw</td>
<td>14</td>
<td>Medium</td>
<td>Low</td>
<td>Moderate (25)</td>
</tr>
<tr>
<td>Policy SL3</td>
<td>Housing Allocation at Hanworth Lane, Chertsey</td>
<td>48</td>
<td>High</td>
<td>Low - Medium</td>
<td></td>
</tr>
<tr>
<td>Policy SL4</td>
<td>Housing Allocation at Coombelands Lane, Addlestone</td>
<td>17</td>
<td>Medium</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td>Policy SL5</td>
<td>Housing Allocation at Blays House, Blays Lane, Englefield Green</td>
<td>36</td>
<td>Medium</td>
<td>Medium</td>
<td>Moderate (95)</td>
</tr>
<tr>
<td>Policy SL6</td>
<td>Housing Allocation at Pyrroft Road, Chertsey</td>
<td>60</td>
<td>Medium-High</td>
<td>Low-Medium</td>
<td>Moderate (56)</td>
</tr>
<tr>
<td>Policy SL7</td>
<td>Housing Allocation at Thorpe Lea Road North, Egham</td>
<td>256</td>
<td>Medium-High</td>
<td>Low</td>
<td>Weak (101)</td>
</tr>
<tr>
<td>Policy SL8</td>
<td>Housing Allocation at Thorpe Lea Road West, Egham</td>
<td>257</td>
<td>Medium</td>
<td>Medium</td>
<td>Moderate (94)</td>
</tr>
<tr>
<td>Policy SL9</td>
<td>Housing Allocation at Virginia Water North</td>
<td>258</td>
<td>Medium</td>
<td>Low-Medium</td>
<td>Moderate (70)</td>
</tr>
<tr>
<td>Policy SL10</td>
<td>Housing Allocation at Virginia Water South</td>
<td>259</td>
<td>Medium</td>
<td>Low-Medium</td>
<td>Moderate (52)</td>
</tr>
<tr>
<td>Policy SL11</td>
<td>Housing Allocation at Parcel B, Vet Labs Site, Addlestone</td>
<td>254</td>
<td>Medium</td>
<td>Low</td>
<td>Moderate (7)</td>
</tr>
<tr>
<td>Policy SL12</td>
<td>Housing Allocation at Ottershaw East, Ottershaw</td>
<td>263</td>
<td>Medium-High</td>
<td>Low</td>
<td>Moderate (11)</td>
</tr>
<tr>
<td>Policy SL13</td>
<td>Housing Allocation at St Peter’s Hospital, Chertsey</td>
<td>231</td>
<td>Medium-High</td>
<td>Low-Medium</td>
<td>Moderate (38)</td>
</tr>
<tr>
<td>Policy SL14</td>
<td>Housing Allocation at Parcel A, Chertsey Bittams, Chertsey</td>
<td>255</td>
<td>Medium- High</td>
<td>Low-Medium</td>
<td>Moderate (40)</td>
</tr>
<tr>
<td>Policy SL15</td>
<td>Housing Allocation at Parcel B, Chertsey Bittams, Chertsey</td>
<td>255</td>
<td>Medium</td>
<td>Low</td>
<td>Moderate (37)</td>
</tr>
<tr>
<td>Policy SL16</td>
<td>Housing Allocation at Parcel C, Chertsey Bittams, Chertsey</td>
<td>255</td>
<td>Medium</td>
<td>Low</td>
<td>Moderate (37)</td>
</tr>
<tr>
<td>Other SD3 Allocations not assessed in SSMA</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

St Edward
Matter 6