Examination of Runnymede Local Plan

Matter 6: Other Allocations for Housing and Mixed Uses

on behalf of Orbit Developments (Southern) (part of The Emerson Group)
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Introduction

This statement has been prepared on behalf of Orbit Developments (Southern) (part of The Emerson Group) who own the Blays House site that is allocated within Local Plan (LP) Policy SL5 for residential development comprising a minimum of 100 dwellings.

As comprehensively demonstrated within the evidence base underpinning the LP and within this statement, the removal of the Blays House site from the Green Belt and allocation for residential development is demonstrably sound against the criteria set out within paragraph 182 of the National Planning Policy Framework (NPPF).

Q6.1a 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 planmaking process, and which of the allocations may be unsound?

6.1.1 Underpinning the LP, 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, which includes (but not limited to):

(i) Green Belt analysis (SD_004A to SD_004Y);
(ii) Housing Land Availability Assessment (SD_06F to SD_06L);
(iii) Site Capacity analysis (SD_011A and SD_011B);
(iv) Site Selection analysis (SD_012A and SD_012B);
(v) Habitats Regulations (SD_017A to SD_017R; and
(vi) Sustainability Appraisal (SD_018A to SD_018R).

6.1.2 It is noted that the Council’s ‘Site Selection Methodology’ Version 2 (May 2017) (SD_012A, Table 2.1) outlines that the approach applied has been informed, not only by its own interpretation of national policy (NPPF 2012) and guidance within the Planning Practice Guidance (PPG), but also by best practice used in the preparation of numerous other adopted local plans (including Blaby, Ryedale,
Selby, South Staffordshire and West Berkshire). Building upon methodologies underpinning independently scrutinised and adopted local plans, the Council outlines (SD_012A, paragraph 4.5) that the following eight stage approach to site selection was undertaken:

**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.

6.1.3 Having comprehensively reviewed the Council’s site selection evidence base and methodology, we are fundamentally of the view that Policy SD3 and Policies SL2-SL18 have emerged from a thorough and objective assessment of all potential sites.

6.1.4 Specifically, regarding the Blays House allocation (Policy SL5), our response to Question 6.1C and 6.3, also demonstrates that the comprehensive redevelopment of this previously developed site is wholly consistent with the LP spatial vision and objectives as well as national policy (NPPF 2012) and guidance (PPG); and is deliverable within the LP period. Consequentially, the Blays House (Policy SL5) allocation for residential development is sound against all four elements of NPPF paragraph 182.
Q6.1b: Is it clear why the Council has decided to allocate the specific sites and not others?

6.1.5 As previously referred, the Site Selection Methodology Final Version (SD_012B) sets out the rigorous methodology applied to assess each potential site and the plan-making process followed, which included subjecting each site to Sustainability Appraisal (SD_018A to SD_018R), to determine which specific sites should be allocated within the LP.

6.1.6 We fully support the clear and transparent process that has been followed and the conclusions reached. This includes the allocation of the Blays House site (SLAA site 156) within Policy SL5.

6.1.7 Following this exercise, the Council has also undertaken a detailed assessment of capacity to establish the quantum of development that each site could accommodate (SD_011B). Specifically, for Blays House (Policy SL5) the site assessment process concluded that the site could accommodate a minimum of 100 residential dwellings.

6.1.8 Indeed, the conversion of the existing two – two and a half storey office buildings on the site could deliver between circa. 60 to 90 residential units. In view of this, the comprehensive redevelopment of the site, to make the best possible use of previously development land (NPPF 2012 paragraphs 17, 89 and 111), will demonstrably deliver at least 100 dwellings on the site.

Q6.1c: Is the proposed development of each of the allocated sites consistent with the Plan’s spatial vision and objectives and with national planning policy?

6.1.9 As previously referred, the Blays House site (Policy SL5) is a previously developed site and is located within an easy walking and cycling distance of the centre of Englefield Green (circa. 750 metres) where there is a range of local facilities and services, including a primary school. A fact confirmed within the ‘Site Selection Methodology Assessment’ (SD_012B).

6.1.10 In determining that the Blays House site has the potential to deliver at least 100 dwellings, the site capacity assessment (SD_011B) applies a range of 1-4+ bed house size types to ensure that redevelopment on the site could achieve a broad mix house size and types.

6.1.11 The individual buildings within the wider Blays House site have an extensive planning history. Prior approval has been granted (Reference: RU.14/1118) for a change of use from office to a single
dwelling house, and Park House, located to the south west of the site has recently been granted permission (Reference: RU.17/1750) for a change of use from office to eight dwellings. These approvals adjacent to the Blays House site demonstrate the suitability of this location and the Blays House site for residential development.

6.1.12 Furthermore, under the office to residential prior approval process, conversion of the remaining two and a half storey office buildings on the site could deliver up to 90 residential units without the release of the land from the Green Belt.

6.1.13 Alternatively, a planning application for the comprehensive redevelopment of the site for residential development would not be considered inappropriate development within the Green Belt (NPPF 2012 paragraph 89 / NPPF 2018 paragraph 145), subject to the proposed development not having an impact on the openness of the Green Belt and the purpose for including land within it. As concluded within the Council’s Green Belt Review Part 2 (SD_004V, Area 95) “the sub-area is already predominantly built-up, with development to the north and in close proximity to the east and a wooded area to the south. As such, it is judged that this area plays a limited role in respect of the wider strategic Green Belt and its loss would not harm its overall integrity”.

6.1.14 Furthermore, as demonstrated within the SA (SD_018A to SD_018R) and SLAA (SD_06F to SD_06L), there are no physical or policy constraints (excluding Green Belt) that would prevent residential redevelopment on the site.

6.1.15 Given the above, the allocation of the Blays House site fully accords with the LP spatial vision and objectives and with national planning policy and guidance. The removal of this site from the Green Belt and allocation for residential redevelopment is therefore sound (NPPF paragraph 182).
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?**

6.2.1  The exceptional circumstances cited for the release of the Blays House site (Policy SL3) within the ‘Exceptional Circumstances Paper’ Addendum (SD_004Y, page 8) include:

- The need for housing – to provide sufficient land to achieve the full Objectively Assessed Housing Need (both within the context of borough wide and individual settlement housing needs); 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.

6.2.2  In addition to the above positive benefits associated with releasing the Blays House site from the Green Belt, another important factor is that the land associated with this site is previously developed. National policy (NPPF 2012 paragraphs 17, 89 and 111) and LP Core Principle 17, are expressly clear over the preference of using previously development land over greenfield land. Indeed, NPPF paragraph 89 (and LP Policy EE17) outlines that an exception to inappropriate development in the Green Belt is partial or complete redevelopment of previously developed sites (brownfield land), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it.

6.2.3  As referred within our response to Q6.1b, conversion of the existing two – two and a half storey office buildings on the site could deliver up to 90 residential units on the site. Furthermore, the Council’s detailed site capacity evidence (SD_011B) confirms that a design-led redevelopment on this site has the potential to deliver at least 100 dwellings.

6.2.4  As set out within our response to Q6.1C, the redevelopment of the Blays House site for at least 100 residential dwellings would not have a greater impact on the openness of the Green Belt and the purpose for including land within it.
6.2.5 As such, we are fundamentally of the view that at both the borough wide level, and at the site specific level, that exceptional circumstances have been demonstrated to justify the proposed amendment of Green Belt boundary in this location. The removal of the Blays House site (Policy SL5) is therefore sound (NPPF paragraph 182, namely bullet 2 and 4).
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?

6.3.1 The Local Plan (LP) trajectory and Policy SL5 anticipate delivery on the Blays House site between 2022 and 2027.

6.3.2 Orbit Developments (Southern) (part of The Emerson Group) own the Blays House site and can confirm that there are no known reasons (legal or otherwise) why redevelopment of this brownfield site, in accordance with Policy SL5, cannot be delivered.

6.3.3 In accordance with NPPF (2012) paragraph 47, footnote 11 and 12 the Blays House site is deliverable and developable.
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?

6.4.1  As set out within the ‘Capacity Analysis Addendum’ (SD_011B, Site 156, pages 8-9) the allocation of the Blays House Site (Policy SL5) for at least 100 dwellings has been supported by detailed capacity analysis that has had regard to the site constraint elements referred to within the Policy SL5 policy requirements, namely existing boundary vegetation, trees, locally listed buildings, biodiversity and the watercourse. The Capacity Analysis also confirms that the site is not considered large enough to provide Gypsy / traveller pitches or C2 / sheltered accommodation.

6.4.2  As referred above within our response to Q6.1C, the SA (SD_018A to SD_018R) and SLAA (SD_06F to SD_06L), confirm that the site constraints elements referred to within the policy requirements are not significant and would therefore not constrain residential redevelopment on the site below that allocated within the policy (at least 100 dwellings). However, to ensure that these constraint elements are appropriately taken into account as part of the decision-making process due course, it is correct and justified for policy wording to be included that refers to these specific elements. The policy requirements as worded are therefore considered to be effective.

6.4.3  The infrastructure contribution elements referred to within Policy SL5, namely education, highways and public footpath improvements, SANGS, outdoor sports and allotments all appear justified based on the LP infrastructure evidence (SD_007A to SD_007S). Given the above, we consider the specific Policy SL5 provisions are sound (NPPF paragraph 182) in that they are justified, effective and consistent with national policy.
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