16 January 2019

Dear Charlotte,

Runnymede 2030 Local Plan Stage 2 Hearing Statements

I write in response to the main matters and questions for Stage 2 Hearings as part of the Runnymede Local Plan examination where PRP is acting on behalf of PLP. The statements submitted relate to Matters 6 and 8.

6. MATTER 6: OTHER ALLOCATIONS FOR HOUSING AND MIXED USES (POLICIES SD3, SL2- SL18 AND SUPPORTING TEXT)

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?

The Green Belt Review undertaken by ARUP in 2014, assessed parcels of land against three of the five Green Belt purposes. These are:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment.

The selection of these three purposes and the discarding of the remaining two is welcomed as they do not apply to RBC.

Arup's assessment of the Green Belt looks initially at broad areas which is an approach deemed to be appropriate with regards to Planning Practice Guidance. However, the next stage of analysis which is intended to look at individual parcels of land vary much in size and scope, meaning that vast areas have been identified as contributing strongly to the Green Belt, despite smaller parcels of land within them contributing
less. Some areas looked at extend to over 30 hectares and the review does not consider smaller parcels of land which may constitute previously developed land or contribute less to the purposes of the Green Belt within these large areas.

At the Stage 1 Hearing sessions, RBC provided a detailed response on why they had not carried out a more granular approach to the Green Belt Review. RBC stated that it would not be appropriate to go into more detail that they had already.

It is therefore considered that RBC has not applied an appropriate or consistent methodology to assessing sites within the Green Belt, and whether they qualify for release and allocation for residential development.

There is a lack of recognition of smaller parcels of land with elements of brownfield that may contribute less to the Green Belt purposes than their broad area assessment implies.

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

It is not considered that RBC has produced clear reasoning as to why it has decided to allocate specific sites and not others. As set out under 6.1 (a), the Green Belt Review fails to identify smaller parcels of land which are suitable for development.

An example of this is Charwood Nurseries, which PRP is representing on behalf of the land holders, PLP. The Site is approximately 2.25ha in size and consists of a number of greenhouses, hardstanding, a telecommunications mast, three small B1 workshop units and a bungalow. The nursery business closed down seven years ago as it was no longer viable, and the buildings are now only partially used and on a temporary basis. The Site’s extensive built form is increasingly falling into disrepair, and has a negative impact on the character and visual amenity of the settlement edge.

The location of the Site on the edge of New Haw in close proximity to local schools (The Grange and New Haw Community Junior School), shops and facilities (at the Broadway) and public transport (bus services and West Byfleet station) means that there is an excellent opportunity to deliver much needed residential development in a highly sustainable location.

As part of the Site Selection Methodology and Assessment ("SSMA") (May 2017), the Site reached Stage 5 where it was deemed that its classification as being within the Green Belt meant that a greater weight should be attached to this rather than it being a medium to high performing site against accessibility and constraints. It was not carried forward to Stage 6. As the site has a significant amount of previously developed land on it, namely the bungalow and three B1 workshops, it should be considered at least in part as brownfield and thus a preferable site to deliver much needed housing.

The fact that the site, and no doubt others, was overlooked by RBC in assessing and allocating sites is further evidence that the council have failed to apply methodologies in a consistent way (see 6.1 a).

This was not included within RBCs assessment and it is therefore considered that there is a lack of justification as to why this site was not allocated over greenfield sites.
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?

RBC’s spatial strategy and distribution is set out within paragraphs 5.28 and 5.29 of the Local Plan and read as follows [emphasis added]:

National policy on the location of development is driven by the principles of sustainable development. With this in mind, the Local Plan builds on the existing settlement pattern in the Borough, focusing the largest amounts of residential growth primarily in Addlestone, Chertsey, Egham and their suburbs. A number of urban extensions are also proposed in these areas to help meet identified development need. The town centres of Addlestone, Chertsey and Egham will be the focus for regeneration and retail development within the Borough, maximising their potential as transport hubs to accommodate further phases of the Addlestone Town Centre redevelopment along with the Egham Gateway schemes.

Lower levels of growth will be expected to be accommodated within the local centres of Virginia Water, Woodham/New Haw, Englefield Green and Ottershaw, respecting and maintaining their position in the centre hierarchy. Residential development in these areas will come forward through redevelopment within the urban area and on urban extensions, with limited scope for additional retail and employment development, beyond the allocation at the Byfleet Road site in New Haw.

Table 1 of Policy SD2 Spatial Development Strategy sets out the minimum growth delivery for each settlement. The respective housing requirements for the ‘local centres’ of Virginia Water, Woodham/New Haw, Englefield Green and Ottershaw are set out in the table below.

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Minimum Housing Growth Delivery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Virginia Water</td>
<td>307 net additional dwellings</td>
</tr>
<tr>
<td>Woodham and New Haw</td>
<td>59 net additional dwellings</td>
</tr>
<tr>
<td>Englefield Green</td>
<td>65 net additional dwellings</td>
</tr>
<tr>
<td>Ottershaw</td>
<td>61 net additional dwellings</td>
</tr>
</tbody>
</table>

It should be noted however that the sustainability of each of the settlements is not consistent across the sustainability category of a ‘local centre’. Both Ottershaw and Englefield Green are not served by a railway station, in comparison to Virginia Water with one rail station and Woodham and New Haw which each have one rail station. The differing levels of sustainability within this settlement category are not reflected in the number of units allocated to each settlement. Virginia Water has a significantly larger allocation of units than the other settlements and this has not been justified by RBC.

It is acknowledged by RBC and the agent that the settlements of Woodham and New Haw can be read as one. However all new development is orientated towards New Haw, with no residential allocations in Woodham despite it containing a railway station just south of the LPA boundary. There is a lack of justification to explain why no residential development is allocated in Woodham, despite its sustainable nature.

Further, with RBC, Surrey County Council and Highways England still unable to come to an agreement on the implications of the Plan for the A320 and the Strategic Road
Network. It becomes even more imperative for the allocation of sites which do not rely so heavily on the A320 and instead have access to public transport options such as rail.

Chertsey South is grouped under Chertsey within the Local Plan as a settlement for a significant proportion of the boroughs required units, and is classed as one of the most sustainable settlements. However, Chertsey South is physically removed from the main settlement of Chertsey, including its services. Chertsey South is heavily reliant on both the A320 and J11 of the M25, and is some distance from the rail station in Chertsey.

In line with national policy (paragraph 7 of the NPPF, 2012), development should be directed towards the most sustainable. It therefore calls into question why greater numbers of units haven’t been directed towards Woodham and New Haw which meets the sustainability categories contained within paragraph 7 of the NPPF (2012). It is suggested that RBC looks to allocate additional sites in Woodham and New Haw.

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?

RBC’s Exceptional Circumstances paper (January 2018 and April 2018 addendum) sets out the reasons as to why releasing land from the Green Belt is necessary. The exceptional circumstances can be summarised as follows.

- The heavily constrained nature of the Borough;
- The need for housing - to provide land to achieve the full OAN and to meet identified needs for gypsies and travellers;
- 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;
- To allow for growth at St. Peter’s Hospital; and
- Inability of other local authorities to assist with meeting any unmet housing needs from Runnymede.

However, paragraph 83 of the NPPF (2012) states that: ‘Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.’

Within the Runnymede 2030 Local Plan, paragraph 5.2 states that: ‘...earlier versions of the Local Plan proceeded on the basis that the Council would meet the full need for housing between 2015 and 2035. This strategy assumed that most new homes would be provided in existing urban areas and previously developed land in the Green Belt. The plan also proposed the limited releases of other land from the Green Belt where this would not prejudice its purposes or integrity. The plan recognised that not all of the housing that is required could be provided in the Borough without causing unacceptable harm to the environment. Therefore it proposed that unmet need arising from...’
economic growth should be accommodated in neighbouring districts under the “duty to cooperate”.

Paragraph 5.4 states that [emphasis added]:

_In the circumstances, the Council has decided that the strategy of this submission version of the Local Plan should be adjusted to reduce the plan period to a 15 year period to ensure that the OAN for the Borough can be met in full._

RBC acknowledge that neighbouring LPAs will not be able to meet any shortfall arising in the district which means that it is all the more necessary for RBC to allocate enough housing within its own boundaries to meet its requirement.

RBC, by its own admission, is unable to demonstrate permanence of the Green Belt beyond the plan period and opted to shorten the plan period in order to try to meet its OAN. Therefore RBC needs to identify more land for release from the Green Belt in order to allow the boundaries to endure beyond 2030. A positive approach to plan-making would be to revisit the site assessments to identify brownfield sites and sites which do not meet the three purposes of the Green Belt which can then be released from the Green Belt and allocated for residential development.

It is considered that RBC have clearly justified that exceptional circumstances exist for the release of land from the Green Belt, however this release of land does not go far enough. It is suggested that more land be identified for release from the Green Belt.

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?_

As set out in more detail in following sections of these statements, a large proportion of sites are reliant on the delivery of mitigation to the A320. At present, no agreement has been reached between RBC, Surrey County Council and Highways England on the impact of the Plan on the A320 and the Strategic Road Network. The longer the absence of an agreement goes on for, the less likely sites reliant on the A320 will be able to be delivered within the expected timescales. RBC should therefore look to allocate sites which are less reliant on the A320, such as Charwood Nurseries.

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?_

No comments.

6.5  _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? 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? 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?_
No comments.

8. MATTER 8: HOUSING LAND SUPPLY

8.1 Information removed by Runnymede Borough Council - Matter 8 part of letter displayed in Matter 8 section of webpage

See in particular “Changes to Planning Regulations for Dwelling Houses and Houses in Multiple Occupation”, CLG Circular 8/2010.
8.3 CONCLUSION

As set out in these statements, it is believed that due to significant gaps in the evidence base and a lack of agreement over highway improvements, there is not enough evidence to suggest that the Plan should be found sound in its current form. We would suggest that there are a number of modifications that can be made by the council in order to make the plan fully sound and positively prepared. We hope that these comments are taken into consideration by the inspector at the examination.

By way of this letter I would like to confirm our intention to appear at the hearings on 6, 7 and 19 February 2019 regarding the two matters. My colleague Andy Black and myself will be speaking. Should you require any additional information then please do not hesitate to contact me.

Yours sincerely,

Lucy Morris
Planner