Runnymede 2030 Local Plan Examination

Representor No 703/1944 Jim Nichol/Brox End Nursery Residents Association (BENRA)

As chair of BENRA and Brox Lane Residents Associations I represent the members and supporters who number in excess of 200 local residents and households.

Matter 8
8.1 (c)

NO, the estimates of site capacities are NOT robust, and have not properly assessed viability, infrastructure and other delivery constraints. We know for sure that in a number of cases the estimates are based on either flawed or narrow high level ‘desk’ assessments. Officers have not carried sufficient detailed end to end assessment of genuine viability and infrastructure constraints and other delivery constraints to be able to ‘guarantee’ that the site capacities they have stated in the LP policies are robust and genuinely deliverable. The current assessments are based on a wide variety of assumptions, and further ignore very important known constraints which have been highlighted to RBC by many local residents in their representation letters.

Accordingly, we believe it is fundamentally wrong to dictate that any allocation will provide ‘for a minimum of xxx dwellings’. Especially when the council has chosen to present each site as a ‘Policy’. This will encourage a planning officer to simply reject a planning application for fewer that xxx dwellings as ‘Not compliant with policy’ – even at pre-planning stage.

The site capacity must be presented in the Plan as an estimate (‘up to 130 dwellings’ or somesuch) for all sites to avoid the above scenario and to encourage the normal democratic process during a detailed planning application to be effective. That will permit a site’s final capacity to be determined after full and detailed consideration of all aspects including consultation with all the relevant authorities, experts and the public, as opposed to the current proposals which are based largely on high level desk studies and flawed assumptions. We are also concerned that safety aspects which were previously of concern to Inspectors and County
Highways as experts are now discouraged/disallowed/diluted to permit more houses to cram into smaller sites where pedestrian footways and other safety matters are not able to be specified because the access land is private property belonging to a third party. Site SL2 is a prime example of all of the above observations. It is simply not possible to deliver 40 dwellings on this site and since Policy SL2 demands it, no houses will be built.

8.1(e)
This Plan has no ceiling. Whereas earlier Plans used the principle of ‘Reserved sites’ which would remain protected from development if the Council reached its five year supply numbers, this Plan will permit almost unlimited build numbers because there seems to be no mechanism to refuse an application as ‘premature’. Residents deserve protection from this concept of build, build, build…. bust.

8.2
NO. To the contrary, the Council has chosen to ignore the lack of deliverability of Policy SL2. If the Council had approved the application (RU.16/0652) which they themselves requested in 2015 for up to 14 houses and now received 240 letters of public support, the homes would have been built by today. The dogged insistence on 40 houses makes the site undeliverable. SL12 is also undeliverable as it is based on a massively flawed assumption that when a detailed infrastructure assessment is carried out it will ‘magically’ conclude that Brox Road and the A320 can handle the significant additional traffic and the local schools will be able to ‘magically’ expand to take the additional demand despite their proximity to ‘Death Junction’ on Brox Road. There may well be other examples of similar, flawed high-level assumptions in the Plan.