Dear Charlotte

Runnymede 2030 Local Plan Examination - Matters 5 (Longcross Garden Village)

On behalf of our client, SMECH Management Company Ltd, please find below our response to the following:

- Runnymede Borough Council’s (RBC) clarification of Longcross Garden Village Green Belt review (RBCLP_28) that was produced in relation to Matter 5 (Longcross Garden Village)
- Viability of the Longcross Garden Village housing allocation

Council’s clarification of Longcross Garden Village Green Belt review (RBCLP_28)

At the Matter 5 Hearing Session, the Inspector requested a note from Runnymede Borough Council & Arup on the commentary for Longcross Garden Village in the Stage 1 Green Belt Review (SD_004L-P) and how this has been taken into account by RBC in their Site Selection Methodology & Assessment (SD_012B). In response to this RBC published note RBCLP_28 on 5th February 2019.

We have reviewed the RBC note and we consider this does not overcome our fundamental concerns with the Council’s Green Belt Review evidence which were explained in detail in our representations to the draft Local Plan Part 1 and 2 (Regulation 19) consultations, in our Hearing Statements and also raised by Rhodri Price Lewis QC on behalf of our client at the Hearing Sessions. Our fundamental concerns with the Council’s Green Belt Review evidence is summarised below:

- The Council’s evidence reads in such a manner as to suggest that the entire process has been designed to ensure that the DERA site is removed from the Green Belt and is therefore suitable for development. Further, as a result of this predetermined element, the exceptional circumstances for releasing land from the Green Belt have not been made out.
- In the Arup GBR Part 1 document General Area 22, which includes the part of the DERA Longcross site south of the M3, performs better against the purposes of the Green Belt than many other General Areas. Based on the methodology used in all other recent Metropolitan Green Belt Reviews, including Arup’s own Review in Buckinghamshire, General Area 22 would not have been taken forward for consideration in the Part 2 Assessment.

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The only reason that the DERA Longcross site within General Area 22 has been recommended for further review by the Part 1 Review is because it is wrongly defined as being unaffected by any Absolute or Significant Non-Absolute Constraints. Part of the site falls within 400 metres of the Thames Basin Heaths SPA. The Runnymede Review defines this as an Absolute Constraint.

- The site does not meet Runnymede’s own definition of a sustainable location for development because it is too far from any existing settlement, and there is no evidence to justify any suggestion that it is large enough in its own right to form a sustainable settlement.

**Viability of the Longcross Garden Village housing allocation (Matter 5)**

The Inspector at the beginning of the Matter 6 Hearing Session highlighted the viability discussions for Matter 5 and offered up the opportunity for participants to make any further viability comments in writing.

In regards to the viability of Longcross Garden Village (Matter 5), we have no further comment on this matter at this stage until further information is made available by the Council in relation to the implications that may arise from the development proposals contained in the submission Runnymede 2030 Local Plan on the A320 and Strategic Road Network (SRN) Junctions.

This information is fundamentally critical to the deliverability and viability of the Longcross Garden Village, the Spatial Strategy of the Runnymede 2030 Local Plan and the Runnymede 2030 Local Plan as a whole. Matters of viability and deliverability are inter-related. Depending on the outcome of the transport assessment work, we would anticipate that the Council will need to undertake additional viability work. We would like to reserve the right to comment further on these matters when additional information is provided.

We would once again like to reiterate our fundamental concern and disappointment that these ongoing matters have not yet been concluded.

I can confirm that representatives from DPDS Consulting Group and our client’s legal team would wish to participate in the additional Hearings Sessions on behalf of SMECH Management Company Ltd on the SRN matters once the assessment work is published by the Council.

RBC has submitted a Local Plan which they believe is sound. We would again like to highlight that it is abundantly clear that this is not the case as the evidence base ‘submitted’ does not adequately inform the Local Plan. The evidence base submitted is also, in our considered opinion, incomplete. We continue to consider that the submission Runnymede Local Plan is *not sound* as it is *not justified, effective and consistent with national policy*.

Yours sincerely

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cc: L M Durrant (Group Chairman and Managing Director, DPDS Consulting Group)
Robert Share (Allen & Overy)