Dear Sir/Madam,

Re: Sandylands Home Farm, Wick Road, Englefield Green, Surrey TW20 0HJ

We are instructed by Stellican Ltd. to submit on their behalf, representations to the Main Modifications Consultation to the Runnymede Local Plan 2030.

These representations follow on from previous written comments submitted formally by Rapleys on behalf of Stellican as part of the Plan making process:

- Pre-submission consultation, February 2018;
- Draft consultation (part 2), June 2018;
- Examination hearings (stage 1), November 2018;
- Examination hearings (stage 2), January 2019.

Stellican is promoting Land, south of Englefield Green and to the west of Blays Lane, for development, and in particular for allocation or safeguarding in the Local Plan. The site is 12ha, and is suitable for a proposed 750 student units or 200 residential units, as stated in our submissions, and most directly in the proposed draft policy in our representation of February 2018. Points made in those documents still have relevance that go to the Plan’s soundness, and are summarised below:

1. The Local Plan will remain unsound if so much reliance is placed on the SD3 allocations that remain contingent on the timely delivery of infrastructure improvements on the A 320. This is especially the case when the problems and needs at Englefield Green are immediate, compelling and still, in part at least, unmet by the proposed increase in dwelling allocations.

2. Using the national average number of students in student-only households (2.5), the provision of 750 student units on the site will release around 300 houses currently used as student HMOs. The project will alleviate a major problem of studentification in Runnymede, and specifically in Englefield Green Westward. The Local Plan simply does not address this problem. The increase of dwellings in Englefield Green from 365 to 611 will still not address the existing studentification problem that has remained an ignored topic related to off-campus accommodation.

3. Notwithstanding the housing target as set out within the Plan, the Standard Method sets a far higher minimum requirement which will need to be addressed as part of any review of the Plan. Land should be identified now in order to ensure that this can be met.
4. Our promoted site has been assessed as making a minimal contribution to the five purposes of Green Belt land and so, like the adjacent land on the other side of Blays Lane, is suitable for release from the Green Belt. Our site is available now for either 750 student units, or 200 residential units.

In our opinion, the Plan is not able to plan for the level of growth needed within the borough, and its strategy (modified so as to be contingent on the delivery of improvement works to the A320) and it is not able to ensure the delivery for which it does plan.

The Plan needs to safeguard (and where sustainable, release and allocate) additional Green Belt sites in order to ensure that the housing target for the reduced plan period can be met and whilst the plan is being reviewed. Land West of Blays Lane is a sustainable site which should be identified for this purpose.

**Housing Requirement**

MM3 changes the Plan’s housing target to 7,507 dwellings over the Plan period of 2015-2030. This equates to 500 dwellings per annum (dpa) which remains below the minimum requirement set by the Standard Methodology, which is currently 545dpa.

Notwithstanding our objection to the Plan’s housing target as inadequate, it has been found sound by the Inspector. Assuming Runnymede adopts its Plan at some point in 2020, it will – in accordance with national legislation and policy - need to complete a review of its Plan (and to take account of the Standard Method minimum requirement) by 2025 at the latest.

In order to deliver this additional housing, the Plan is explicit (via MM7) that additional housing land will need to come from the Green Belt:

> During the course of Plan preparation, the Council made the decision to reduce the Plan period so that instead of ending in 2035, the Plan period now ends in 2030. This change in approach occurred following the Additional Sites and Options stage when the Council identified that, set against its annual housing needs figure of 498dpa, it could not identify enough land to meet the need for housing up to 2035, without making substantial inroads into the Green Belt, beyond the adjustments that had been made in respect of the weakly performing, or strategically less important, Residual Land Parcels.

**Deliverability and A320 Works**

Many of the modifications revolve around highway considerations in order to align housing supply with requirement. It is suggested that this is a high-risk strategy for the delivery of much needed housing and is unsound as an approach.

The modifications serve to stall delivery on many of the housing sites until Improvement works to the A320 are complete. MM9 serves to include the caveat ‘subject to delivery of necessary mitigation on the A320’ to timelines for 11 of the Plan’s housing allocations.

Longcross Garden Village is one of these allocations. MM22 includes the following additions:

> Surrey County Council and Runnymede Borough Council agree in principle that the continued delivery of residential development at Longcross Garden Village, in advance of the full completion of the A320 North of Woking Scheme, is technically feasible. Runnymede Borough Council anticipates that in the order of 600 homes (excluding completions and commitments arising from the existing hybrid planning permission) could be delivered at Longcross Garden Village in advance of the full completion of the A320 North of Woking Scheme in March 2024. The precise amount and types of housing to be delivered in advance of the A320 improvements will be determined through the planning application process. The detailed transport assessments submitted with future planning
applications will consider the contribution from different options for minimising the net impact of traffic on the A320 corridor in order to facilitate the continued delivery of housing at Longcross Garden Village.

The Modification also requires mitigation measures to be secured through a S106 agreement. The failure to secure this in a timely fashion would delay the delivery of Longcross, and possibly the full extent of the Plan-contingent A320 works.

The delivery of (an unconfirmed quantity of) housing at Longcross prior to the completion of the A320 works will reach – beyond dispute – the network’s saturation point. It will not be sustainable to support the delivery of any further housing (on Longcross or elsewhere) that will have a further impact on the A320 until the works are complete.

**The need to safeguard Green Belt sites now**

Five years after the adoption of the Plan, completion of a review of that same Plan will be required. We understand that the Council are planning to commence work on this by 2021. This review will need to accommodate a greater level of housing need in order to accord with the Standard Method requirement and plan for at least 15 years.

It is also clear that further housing land will need to be located within the Green Belt.

Paragraph 22 of the NPPF requires strategic policies to look ahead over a minimum of 15 years from the point of adoption. If the Local Plan Review is completed and a revised plan adopted in 2025, it will need to have a plan period running up to at least 2040. This would increase the extent of the existing Plan period by twenty years, and it will necessitate a comprehensive re-appraisal of the Green Belt in order to identify sustainable sites.

The Plan review will also need to account for any delays to the A320 works, and the possibility that the allocated sites will not come forward as anticipated. In such an event, additional land will need to be identified to ensure that the delivery and supply of housing remains – at a minimum – commensurate with the adopted target of 500dpa and that there is no disruption to supply otherwise a backlog in supply will develop.

In order to plan as proactively as possible, Runnymede should both identify and safeguard additional sites for residential development now. Where it is sustainable to do so, the current Local Plan should release sites from the Green Belt as part of this allocation and safeguarding process. If the Plan’s strategy fails, these sites will be readily available and not dependent on the development control and Very Special Circumstances process in order to contribute to the borough’s housing target. There will not be another opportunity to release Green Belt sites until the next Local Plan review, where it is inevitable that there will be a need to provide further sites.

**Land West of Blays Lane**

As set out in previous consultation representations and hearing statements, Land to the West of Blays Lane represents a sustainable location for housing. It is adjacent to the allocation at Blays House, beyond which lies the Cala Homes’ ‘Virginia Gate’ housing development. These planned developments further limit the role of the site’s contribution to the Green Belt.

The site is sustainable, accessible, permeable, and well connected to the existing urban area and associated infrastructure. For reasons noted in our representation to the consultation of February 2018, the role the site plays in contributing to openness, and of protecting the countryside from encroachment is limited.
Land West of Blays Lane should be either allocated now or released and safeguarded now from the Green Belt to ensure that the Plan can meet its own stated housing target in the event that the A320 works are delayed. In addition, allocation or safeguarding will proactively help the local authority to deliver the increased housing requirement that will need to be met five years after the Plan’s adoption as a result of the Standard Method.

Yours sincerely,