By Email: planningpolicy@runnymede.gov.uk

Dear Sir/Madam,

**RUNNYMEDE 2030 LOCAL PLAN - MAIN MODIFICATIONS CONSULTATION**

**RESPONSE TO THE SCHEDULE OF PROPOSED MAIN MODIFICATIONS (JANUARY 2020)**

**REPRESENTATIONS SUBMITTED ON BEHALF OF CREST NICHOLSON AND AVIVA**

We write on behalf of our clients, Crest Nicholson and Aviva (formally Crest Nicholson and CGNU), in response to the Runnymede 2030 Local Plan: Schedule of Proposed Main Modifications (January 2020) ("the Proposed Main Modifications") in respect of the allocation of Longcross Garden Village ("LGV" or 'the Site'). Crest Nicholson and Aviva own LGV which is included as an allocation proposed to be removed from the Green Belt in the Runnymede 2030 Local Plan under Policy SD10 (Longcross Garden Village). Following the Stage 3 Examination Hearing in November 2019, our clients are pleased that the Proposed Main Modifications have been published and that the Local Plan is advancing towards adoption.

Generally, Crest Nicholson and Aviva are supportive of the Proposed Main Modifications, subject to resolving the following matters which we set out below. Where we consider the proposed wording set out in the Proposed Main Modifications is unsound, we have suggested further modifications which are shown as either struck-through (suggested deletions) or underlined (suggested additions).

**Policy SD2 (Spatial Development Strategy)**

**MM12 - Paragraph 5:40**

Crest Nicholson and Aviva support the Proposed Main Modifications which seek to clarify how the early delivery of the Site (and other allocations) will be supported in advance of the A320 mitigation works. To provide greater clarity, we propose the following minor amendment to paragraph 5.40:

“...transport assessments submitted as part of the planning applications for these sites demonstrate that the impact on the A320 would be acceptable, having particular regard to the timing of the A320 improvement works being brought forward delivered and the objective of securing the timely delivery of housing within the borough.”
MM14 - Tables 1 and 2

Table 1 includes an increase in the number of minimum net additional dwellings for LGV from 1,718 to 1,779 units (stating that this includes 97 completions and 33 dwellings for C2 specialist accommodation). For consistency with the allocation policy and to allow flexibility in the future masterplanning of the Site, the figures in Table 1 should be amended to reflect those set out in Policy SD10 (LGV), which requires a minimum of 1,700 dwellings, including existing completions (the exact number of which does not need to be stated). This amendment would also reflect the ongoing pre-application discussions with the Council regarding the emerging masterplan for Longcross South which is being prepared by Crest Nicholson and Aviva.

With regard to the numbers of C2 dwellings which are required to be delivered at LGV, we note the increase in numbers of C2 units from 23 in the submitted Local Plan to 33 units in the Proposed Main Modifications, albeit there is no explanation for this change. We would welcome further clarification on the increase on this number. Furthermore, this differs from the requirement in Policy SD10.

Crest Nicholson and Aviva recognise and support the principle of providing specialist accommodation as part of the proposals for LGV, which could include C2 provision. However to ensure flexibility as the masterplan for LGV evolves, we suggest that Policy SD2 is amended to remove reference to a specific number of C2 dwellings, and instead to reflect Policy SD10 criterion b and state: “a minimum of 1,700 net additional dwellings and specialist accommodation which comprises a mix of housing tenures and types.”

MM18

MM18 also relates to Table 2 of Policy SD2 and sets out the expected housing delivery rates from 2015 to 2030 to meet the objectively assessed needs. For consistency and flexibility, the figures for minimum net additional dwellings should reflect those set out in Policy SD10, i.e. a minimum of 1,700 dwellings including existing completions.

Policy SD6 (Infrastructure Provision and Timing)

MM21 - Second Paragraph

The second paragraph of Policy SD6 relates to the timing of infrastructure provision and confirms that future development proposals will be required to consider the impacts of ‘other developments’ outside of Runnymede. It is unclear what constitutes ‘other developments’.

Following the review of the Updated Strategic Highways Assessment Report (SHAR) (July 2019) (Ref. RBCLP_47) which considered the cumulative traffic impacts of developments within and outside of Runnymede, we are pleased that it has been confirmed that Local Plan developments can be accommodated on the highway network subject to suitable mitigation.

Previously, the original SHAR (2017) (Ref. SD_015C) considered ‘other developments’ at Fair Oaks Airfield (Surrey Heath) and Martyr’s Lane (Woking) which were not committed through confirmed planning permissions. The updated SHAR (July 2019) now removes the impacts of these developments on the basis that they are not committed, which we fully support.

Related to this, we suggest that the second paragraph of Policy SD6 is amended to refer to developments that are committed (through allocations in adopted Local Plans and/or planning permissions) rather than simply ‘other developments’. We therefore suggest the following amendment:

“...while also taking account of other committed developments outside Runnymede that require mitigation from infrastructure schemes proposed within the Borough.”
Policy SD10 (Longcross Garden Village)

MM22 - Criterion b) Table

It is not envisaged that the proposed changes to the table at Policy SD10, criterion b, regarding Affordable Housing, will have a material impact on viability for Longcross Garden Village. The precise mix and type of Affordable Home Ownership will be negotiated through the S106 Agreements accompanying the future planning applications for residential development within LGV.

SL24 (Self & Custom Build Housing)

MM42 - Paragraph 6.65

With regards to MM42, we note that there has been additional wording which has been included in the Policy in relation to Self & Custom Build Housing. This requires an expectation for developers to demonstrate that consideration has been given for providing custom and self-build plots where there is an identified need. Policy SD10 (LGV) specifically requires ‘up to 5% of non-specialist housing to be delivered by SMEs and/or as custom and/or self-build plots’.

Crest Nicholson and Aviva acknowledge that there is an expectation to provide non-specialist housing and self-build plots as part of the LGV development and as part of the overall housing mix, but are concerned that this requirement is not specifically required for the other Local Plan allocations. Therefore, we suggest that the specific requirement is removed in order to retain equal flexibility for LGV.

Summary

As set out above, Crest Nicholson and Aviva are generally supportive of the Schedule of Proposed Main Modifications and are pleased that the Runnymede 2030 Local Plan is progressing towards adoption in Summer 2020.

The comments and changes proposed above minor but subject to these amendments, we consider that this would ensure that the Local Plan is ‘sound’. In summary we request that there is consistency between Policy SD2 and SD10 in terms of the number of homes proposed at LGV in Tables 1 and 2; and that Policy SD6 refers to ‘committed’ developments in the context of mitigation and infrastructure provision required.

We look forward to engaging with the Council further during the pre-application stage and welcome the changes which have been made on the Local Plan to date.

We trust that the above comments are of assistance to the Council and would be grateful if we could receive confirmation that these representations have been registered as being ‘duly made’. However, should you have any queries in relation to the above please do not hesitate to contact the writer on 0118 943 0000 or katherine.jones@bartonwillmore.co.uk.

Yours faithfully,