20 September 2019
L 200219 FGV RBC Main Mods

Planning Policy and Economic Development team,
Runnymede Borough Council
Runnymede Civic Centre,
Station Road,
Addlestone,
Surrey,
KT15 2AH

By Email: planningpolicy@runnymede.gov.uk

Dear Planning Policy and Economic Development team,

RUNNYMEDE 2030 LOCAL PLAN - MAIN MODIFICATIONS CONSULTATION

This letter responds to Runnymede Borough Council’s (RBC) 2030 Local Plan Main Modifications consultation on behalf of our client Fairoaks Garden Village Limited (FGVL). The consultation is open from 10 January 2020 until 21 February 2020 and relates to a Schedule of Proposed Main Modifications as recommended by the Inspector following the conclusion of the Runnymede 2030 Local Plan Examination Hearings in November 2019.

Context

The representation concerns proposals for Fairoaks Garden Village (FGV), which covers an area of 156 hectares and straddles the administrative boundaries of Runnymede Borough Council (54ha) and Surrey Heath Borough Council (SHBC) (102 ha). A planning application for FGV was submitted in July 2018 including:

- Up to 1,000 new dwellings, including affordable housing;
- Extensive employment space (replacement and new) generating more than 1,200 net additional jobs;
- A mixed use Local Centre;
- A two-form entry primary school;
- Community buildings;
- A new sustainable transport and vehicle route between the A319 and A320;
- Two areas of Suitable Alternative Natural Greenspace (SANG) plus a visitor centre;
- Public open space including allotments, sports pitches and informal recreational space.

The two areas of SANG and a small part of the proposed link road between the A320 and A319 fall within the administrative area of RBC. With the exception of this, all other development, including some additional SANG, fall within Surrey Heath. FGVL has also been engaging with SHBC’s emerging Local Plan.

As RBC is aware, on 10 February 2020, FGVL withdrew the above planning application in order to progress with a marketing exercise to select a development partner. FGVL are in the latter stages of
this process and will shortly be announcing their preferred partner. Once selected, FGVL and its new partner will review the masterplan and will bring forward changes to the proposals that reflect the latest requirements and best practice of the Garden Village initiative.

Savills on behalf of FGVL submitted previous representations to the emerging RBC Local Plan and attended the Examination Hearings. These will not be repeated, and therefore the below corresponds to specific Main Modifications.

Schedule of Main Modifications

Modification Reference MM7 - Policy SD2: Spatial Development Strategy

RBC has reduced the Plan period by five years so that it ends in 2030 rather than 2035. Such a change has implications for future plan-making. The Local Plan 2020 would thus be forward planning for around 10 years when adopted, despite Paragraph 22 of the National Planning Policy Framework directing that strategic policies should look ahead over a minimum 15 year period from adoption. It is therefore likely that an immediate review of the Local Plan would need to be undertaken.

RBC has noted a key advantage that it would be able to better coordinate and integrate with plans prepared by its neighbours through a second phase of the Surrey Local Strategic Statement to facilitate a long term, joint approach to growth across Surrey. FGV is a cross boundary site between RBC and SHBC and supports this aspiration for strategic working.

Alongside housing delivery, a vital factor to ensuring that Local Plans in RBC, and SHBC, are future proofed is the provision of SANG. The provision of new SANG is fundamental to enable housing delivery and would benefit from strategic working between authorities.

The proposed 52 hectares of SANG as part of FGV could make a valuable contribution to delivering housing. This is emphasised within RBC’s evidence base, where various references are made to the need for additional SANG provision during the Plan period, if additional housing is to be accommodated. The need is even more acute in SHBC.

Notably, the SANG at Fairoaks is included in a list of potential future SANG sites (Examination ref: RBCLP_09a). The proposed SANG at FGV allows for over 58% of the site as public open space, including 27.97ha of SANG beyond the scheme’s requirements. The excess SANG would meet the SANG requirements for approximately 1,456 dwellings elsewhere (8ha per 1,000 population), assisting with SANG deficiencies in the local area.

It is therefore recommended that on review of the Local Plan RBC liaises with SHBC on key strategic matters such as SANG, recognising that FGV is in a strong position to offer a solution to difficulties of housing delivery.

Modification Reference MM47 - Policy EE10: Thames Basin Heaths Special Protection Area

A new paragraph after 7.81 has been added to include specifics about SANG sizes and their relative catchment areas. It sets out that, as a guide, SANG of 2 to 12 hectares will have a catchment of 2km; SANG of 12 to 20 hectares will have a catchment of 4km; and SANG of 20 hectares or more will have a catchment of 5km.
FGV proposes 52 hectares of strategic SANG and therefore provides a catchment of 5km. As a guide, this 5 km catchment spans beyond Addlestone, Chertsey, Ottershaw, to around Virginia Water train station; the majority of RBC.

Modification Reference MM62 - Appendix A – Monitoring Framework

The addition of SANG capacity as an indicator within the monitoring framework (Objective 9), and the addition of annual reviews of SANG capacity (Objective 9, target 4) to enable the delivery of Local Plan housing targets is supported. The importance of SANG is detailed above.

Modification Reference MM20 – New para after 5.52: Local Transport Strategy

The modification notes that a Runnymede Local Transport Strategy is being produced which will set out a programme of interventions to promote and encourage sustainable travel. FGVL support this modification in principle, and would be keen to engage in the production of this document as future development of FGV could provide a bus service between Woking railway station and St Peter’s Hospital, improving sustainable travel for residents in Runnymede. In addition, FGV would encourage a number of other sustainable travel options including improvements to the footpath and cycleway along the A320 to Woking railway station.

Modification Reference MM12 – Para 5.40: Site delivery in the A320 corridor

RBC state that this modification is included to help clarify the Council’s approach to site delivery in the A320 corridor. Whilst FGVL do not have any specific comments to make in relation to this, it is important to note that a benefit of a future development of FGV is the delivery of a link road between the A320 and A319 which will add permeability to the existing road network (including on the A320) to allow better management of existing and future flows.

Summary

This representation has been prepared on behalf of FGVL and responds to the 2030 Local Plan Main Modifications consultation. It is prepared in the context of the proposed Fairoaks development which could contribute circa 52 hectares of strategic SANG across the boundaries of RBC and SHBC.

It is understood from the Main Modifications that the Local Plan period now ends in 2030 rather than 2035, a reduction of five years, as a result of difficulties in meeting housing need. While concerning that the RBC Local Plan will now be planning for 10 years (as a maximum) from adoption, it provides the opportunity for RBC to engage with neighbouring authorities such as SHBC in order to confront key strategic matters such as SANG, recognising that FGV is in a strong position to offer a solution to difficulties of housing delivery.

If you require any further information please do not hesitate to contact me on the above details.

Yours sincerely
Local Plan Proposed Modifications Consultation
Comments Form

The best way to comment on the Proposed Main Modifications is using the below comment form.

Once completed, please send us your completed comments form by:

- E-mail to planningpolicy@runnymede.gov.uk or
- Post to Planning Policy and Economic Development team, Runnymede Borough Council, Civic Centre, Station Road, Addlestone, KT15 2AH

We must receive all responses by 11:59pm on Friday 21st February 2020. Any comments received after this cannot be accepted.

Introduction

Runnymede Borough Council is consulting on the following:

- Schedule of Proposed Main Modifications ONLY

The following documents are also published for information only:

- Schedule of Proposed Additional Modifications
- Proposed Main Modifications Sustainability Appraisal
- Proposed Main Modifications Habitat Regulations Assessment
- Proposed Main Modifications Equality Impact Assessment

How to comment

The Council is inviting comments on the Proposed Main Modifications from Friday 10th January 2020 until 11:59pm on Friday 21st February 2020. You can view the consultation documents at:

- https://www.runnymede.gov.uk/article/13869/Runnymede-2030-Local-Plan-Emerging-
- At Runnymede Civic Centre
- Local library locations in and around Runnymede

Comments can be made using this form and returned by:

E-mail planningpolicy@runnymede.gov.uk

Post or Hand Planning Policy and Economic Development team, Runnymede Borough Council, Civic Centre, Station Road, Addlestone, KT15 2AH
If you are completing this form electronically, please save this questionnaire to your computer using the Save As button on your toolbar, fill it in, and then e-mail it to: planningpolicy@runnymede.gov.uk.

We must receive all responses by 11:59pm on Friday 21st February 2020. Any comments received after this cannot be accepted.

Please note that any comments made verbally or anonymously cannot be accepted.

If you need help making comments or have any questions, please e-mail planningpolicy@runnymede.gov.uk or call Planning on 01932 425131.

How comments will be used

All the comments on the Schedule of Proposed Main Modifications will be sent to the Inspector carrying out the Examination so she can conclude her examination and make a final recommendation.

Representations should only relate to the changes contained in the Schedule of Proposed Main Modifications. Anyone that has made a representation to the Draft Local Plan consultations in 2018 does not need to make their representation again unless a new comment on the proposed Main Modifications is being made.

Copies of comments received during the course of the consultation will be made available for the public to view on the Council’s website.

IMPORTANT

Copies of comments received during consultation will be made available for the public to view on the Council’s website. Comments therefore cannot be treated as confidential. Personal details will be redacted prior to publishing. Data will be processed and held in accordance with the Data Protection Act 2018. Please see the Council’s Privacy Statement for more information.
### Part A – Your Contact Details

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<thead>
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<th>Agent Details (if applicable)</th>
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### Part B – Your Comments on the Main Modifications

Comments made should be concise and any supporting information should be clearly referenced. Please indicate clearly the relevant Main Modification number that you are commenting on. If you wish to submit a comment on more than one Main Modification, please complete a continuation sheet for each one.

#### Schedule of Proposed Main Modifications

<table>
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<tr>
<th>Modification Reference Number:</th>
<th>MM 7</th>
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**Q1. Do you consider the Proposed Main Modification to the Local Plan to be sound***?**

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**Q2. If you consider the Proposed Main Modification is ‘unsound’ please identify the test of soundness to which your representation relates:**

<table>
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<th>Justified</th>
<th>Effective</th>
<th>Consistent with National Policy</th>
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**Your Comment:**

Please see accompanying letter.

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*The considerations in relation to being ‘sound’ are explained in Appendix 1 of this Form.

Any comments received after 11:59pm on Friday 21st February 2020 cannot be accepted.

If you wish to submit any supporting information please ensure they do not contain any signatures, e-mail addresses or personal postal addresses.

Thank you for being a part of the consultation.

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Please indicate if you have included a continuation sheet?

Yes...X...... No.........
Continuation Sheet

Comments made should be concise and any supporting information should be clearly referenced. Please indicate clearly the relevant Main Modification number that you are commenting on. If you wish to submit a comment on more than one Main Modification, please complete a continuation sheet for each one.

Schedule of Proposed Main Modifications

Modification Reference Number: MM 47

Q1. Do you consider the Proposed Main Modification to the Local Plan to be sound?*

Yes  

No  

Q2. If you consider the Proposed Main Modification is ‘unsound’ please identify the test of soundness to which your representation relates:

Positively Prepared  

Justified  

Effective  

Consistent with National Policy  

Your Comment:

Please see accompanying letter.

Any comments received after 11:59pm on Friday 21st February 2020 cannot be accepted.

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Thank you for being a part of the consultation.
## Continuation Sheet

Comments made should be concise and any supporting information should be clearly referenced. Please indicate clearly the relevant Main Modification number that you are commenting on. If you wish to submit a comment on more than one Main Modification, please complete a continuation sheet for each one.

### Schedule of Proposed Main Modifications

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**Q2. If you consider the Proposed Main Modification is ‘unsound’ please identify the test of soundness to which your representation relates:**

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**Your Comment:**

Please see accompanying letter.

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If you wish to submit any supporting information please ensure they do not contain any signatures, e-mail addresses or personal postal addresses.

Thank you for being a part of the consultation.
Comments made should be concise and any supporting information should be clearly referenced. Please indicate clearly the relevant Main Modification number that you are commenting on. If you wish to submit a comment on more than one Main Modification, please complete a continuation sheet for each one.

### Schedule of Proposed Main Modifications

| Modification Reference Number: | MM 20 |

**Q1. Do you consider the Proposed Main Modification to the Local Plan to be sound?**

| | Yes | No |

**Q2. If you consider the Proposed Main Modification is ‘unsound’ please identify the test of soundness to which your representation relates:**

| | Positively Prepared | Justified | Effective | Consistent with National Policy |

**Your Comment:**

Please see our accompanying letter.

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Any comments received after 11:59pm on Friday 21st February 2020 cannot be accepted.

If you wish to submit any supporting information please ensure they do not contain any signatures, e-mail addresses or personal postal addresses.

Thank you for being a part of the consultation.
**Continuation Sheet**

Comments made should be concise and any supporting information should be clearly referenced. Please indicate clearly the relevant Main Modification number that you are commenting on. If you wish to submit a comment on more than one Main Modification, please complete a continuation sheet for each one.

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**Q1. Do you consider the Proposed Main Modification to the Local Plan to be sound?**

- Yes 
- No

**Q2. If you consider the Proposed Main Modification is ‘unsound’ please identify the test of soundness to which your representation relates:**

- Positively Prepared
- Justified
- Effective
- Consistent with National Policy

Your Comment:

Please see accompanying letter.

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Any comments received after 11:59pm on Friday 21st February 2020 cannot be accepted.

If you wish to submit any supporting information please ensure they do not contain any signatures, e-mail addresses or personal postal addresses.

Thank you for being a part of the consultation.
Soundness

Soundness is explained in the National Planning Policy Framework (2012), paragraph 182. The Inspector has to be satisfied that the Local Plan is positively prepared, justified, effective and consistent with national policy.

**Positively prepared**
The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

**Justified**
The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Effective**
The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

**Consistent with national policy**
The plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.