25 February 2020

Planning Policy
Runnymede Borough Council
Civic Centre,
Station Road,
Addlestone,
KT15 2AH

Dear Sirs

Consultation on Proposed Main Modifications to the Runnymede 2030 Local Plan

The following representations are submitted on behalf of Re-Creo Developments (Addlestone) Ltd, a representor to the Runnymede Local Plan and who has been represented by Mr John Baker of Point Consultancy, who will pick up these comments in due course. We are grateful for the opportunity to comment on these modifications. These representations should be considered alongside the evidence previously submitted to the Examination by Mr Baker.

Our comments as set out below underline the concerns jointly expressed with other participants, as set out in the letter of 21 February 2020, that the main modifications appear to be set out by the Council on the basis that these have already been agreed with the Inspector, a situation that gives rise to additional procedural and substantive concern.

We further note that the additional Sustainability Appraisal accompanying these proposed Main Modifications concludes there is no substantive policy change in the vast majority of cases and hence that there is no impact on the overall findings of the sustainability appraisal. That cannot be the case given the caveat inserted into a number of policies regarding the A320 improvements required and the risk that these sites may not come forward to the extent or at the time assumed in the trajectory. This significant risk must have consequence for the delivery of sustainable development which has been glossed over in the updated assessment.

MM1

We note the change but would comment that this does not alter our fundamental concerns over the inconsistencies between the Plan and the NPPF 2012 and failure to reflect the golden thread running through planning and the NPPF.

We would note that there is no realistic commitment to delivery of a 5 year review and no reliance can be placed on this occurring within this timescale to complete the failings in this Plan, it is simply not a positive approach that complies with the NPPF.
MM3

While the change expresses the Council’s arithmetic for the total plan provision and annualised requirement, we again note that this change fall well short of the true requirement set out in earlier evidence submitted by Mr Baker. This is the OAN for the full 15 year plan period, not the 9 years or less proposed.

MM5

This is a new paragraph proposed at the invitation of the Inspector and sets out a definition of what the Council consider to be strategic policies.

In light of previous evidence submitted, we consider that these policies are not strategic in nature and fail to provide:

- A clear spatial strategy that can secure sustainable development;
- adequate housing numbers to meet identified need;
- a sufficient plan period that addresses the need for a 15 year plan life;
- and long term certainty over land released for housing and the extent and policies for the protection of green belt.

The Plan is signally non-strategic in nature and aspiration. Instead it aims to do the minimum necessary (though it fails to do even that) and defers strategic decisions in a manner that undermines its effectiveness and renders it non compliant with the relevant policies of the NPPF.

There are no strategic policies that adequately provide for the required 5 housing supply or which we can be confident will meet the housing delivery test, particularly given the reliance on the sites reliant on A320 mitigation.

This contrasts with the Council’s commitment on the 17 October 2019 to a Climate Emergency and becoming a zero carbon Borough by 2030. This firm Council commitment requires a land use response and that must be based on a sustainable spatial strategy for development. This is not delivered by this Local Plan.

MM6

The modification proposes the deletion of policy SD1 and supporting text on the grounds of brevity and duplication.

We are concerned that in the absence of the commitment to sustainable development and given the concerns expressed above and previously, the Plan is not positively prepared and does not meet the requirements of the NPPF and statute to deliver sustainable development.

This must include a sustainable spatial strategy designed to maximise opportunities for walking and cycling, concentrate development in and around the primary towns (i.e. Addlestone) and achieve effective long term public transport. It must also clearly meet development needs with good access to jobs, services and leisure facilities, provide for low carbon living and provide for the long term certainty over protection of heritage and the environment, including the Green Belt.
The modification sets out the Council’s current rationale for the reduction in the Plan period.

This is a fundamental concern, addressed in previous evidence. It cannot be an adequate response to the unwillingness to identify sufficient housing land to meet the needs of the proper Plan period.

Further, this rationale was not given at the outset and has only emerged through the consultation and examination process to seek to retrospectively justify the approach proposed. It is further, fundamentally inconsistent with core planning principles, which require a plan period and set of accompanying policies and proposals, that provide certainty as to the nature and level of development to be provided, the spatial strategy to be adopted and to clearly indicate where development will and will not be acceptable. In Green Belt areas this must require a longer timescale (not shorter), longer than a normal plan period, to provide the long term certainty and confidence required by national planning policy in Green Belt boundaries.

This Council’s rationale is that the 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 Resultant Land Parcels.

The Council therefore, propose to depart from clearly expressed (and consistent) national planning policy simply because they could not identify sufficient land without reassessing the sites considered for release. That is not an adequate response. The correct response should have been to make that reassessment and it is our submission that there are sites available that can contribute to supply in the short term without having an unacceptable impact on the Green Belt (i.e. the land being promoted at Green Lane, Addlestone).

In such circumstances, these sites must be considered. The default should not be the acceptance of a flawed Plan that is patently at odds with delivering the step change in supply sought by the NPPF and Government policy.

There can equally be no certainty that the Council will deliver a review of the Local Plan within 5 years, especially given past performance. The last Local Plan published in 2001 started out in 1995 and when adopted in 2001 contained a similar commitment to review the Plan to keep it up to date. The Council have failed to do so and have failed to deliver an adequate housing supply within the intervening period, exacerbating the shortfall.

None of the adjoining authorities have adopted a similar short term approach even though they are all affected by the same constraints and development needs, are also parties to the Surrey Local Strategic Statement and within proximity to Heathrow – these factors simply do not form an adequate basis for delaying a proper long term vision in accordance with Government policy.

Further, a large proportion of the allocations identified are dependent on the A320 and subject to significant uncertainty over their delivery and the nature and timing of any contribution they may make. If the Plan were really to wish to make a viable and positive contribution to short term supply, it should properly focus on
delivering sites that are not affected by such a clear constraint (i.e. land at Green Lane Addlestone) and which promote more sustainable modes of transport such as walking and cycling and are well related to the key towns.

**MM9, MM11, MM13 and MM16**

We are concerned that the figures set out in the modification overstate the trajectory for the reasons stated and represent an overly optimistic supply position, albeit over a deliberately short plan period. There is significant reliance, over 50% of the allocations, are dependent on A320 mitigation, something that is wholly uncertain for the reasons stated elsewhere in these representations.

**MM12**

The proposed modification sets out the premise that those allocations dependent on the A320 improvement could perhaps, be delivered earlier in the plan period than stated if the 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 improvements works being brought forward and the objective of securing the timely delivery of housing within the borough.

This is simply an unacceptable basis on which to present a significant component in the supply identified in the Local Plan. There is no reliable or credible evidence that the improvement works will be designed, funded and delivered within a timescale that mitigates the clear impact that the identified developments, individually and cumulatively, would have. It is quite frankly a wing and a prayer and is no basis on which to base such an important part of supply, especially when the Local Plan period has been reduced and its only rationale is to get something (albeit flawed) adopted to boost short term supply.

This is particularly so when in promoting a flawed Plan, this ignores sites that are available, do not have an adverse impact on the A320 and are compatible with a proper assessment of Green Belt.

**MM14**

Policy SD2 ought to set out a proper strategic vision that represents a sustainable spatial strategy rather than reflecting a function of those allocations the Council feel they can support. This should be the basis for promoting sustainable development.

Specifically, as the principal town in the Borough and main service centre with good public transport connections, growth and the consequent requirement for Addlestone should increase, also reflecting the availability of sustainable sites such as that promoted by Re-creo at Green Lane.

There is an inconsistency in adopting the methodology which includes older persons and student accommodation while still relying on the 2012 NPPF, but acknowledge this is an unusual situation for a Plan to straddle methodologies.
MM17 and MM18

We remain concerned for the reasons stated above that the trajectory and consequent amendments to the figures within these tables and related text is significantly over-optimistic on the level of completions that can be delivered in the first 5 years when compared to the available information on Longcross and the constraints affecting the A320 sites.

The trajectory and dates given by the Council suggest that a significant proportion of the A320 dependent completions rely on the completion of the mitigation schemes in accordance with the stated programme. It is clearly the intention of the Council and from the submitted Plan that this provision cannot be completed and occupied until the mitigation schemes are completed.

MM19 (and due to the connection with the A320 improvements also MM24, MM26, MM31, MM32, MM33, MM34, MM35, MM36, MM37 and MM38)

We remain fundamentally concerned that the over-optimistic assumptions underlying the delivery of sites and the related time periods assumed for the trajectory, as set out in these changes, does not reflect the serious nature of the A320 constraints or the lack of a clear scheme that is properly designed, funded and capable of delivery. There is very substantial reliance on sites delivering homes in the first 5 years following adoption in circumstances where there simply is not the confidence this will be achieved.

The substantial extent of reliance on the number of homes to be delivered, where this is a defining factor, reduces the level of certainty and hence the effectiveness of the plan at fulfilling the supply of homes required. It is not sound and will not be effective or compliant with the NPPF in delivering sustainable development. Indeed, there is no adequate evidence base to justify this approach and support such levels of delivery given the evidence that has been submitted to the examination.

MM20

While we welcome the commitment to achieving sustainable transport strategies, we would again note the fundamental failure of the Plan as proposed to adopt a spatial strategy designed to achieve sustainable modes of transport. In particular, it fails to prioritise development within and close to Addlestone and the other settlements in a manner that promoted walking, cycling and bus patronage. As such, it relies excessively on measures designed to try and make unsustainable locations more sustainable, which can only ever be a secondary response and one which is bound to lead to a less sustainable outcome.

MM21

We are concerned that despite ostensibly wishing for the Plan to be infrastructure led, the amendments now proposed are allowing a situation to develop where infrastructure follows development or potentially is not delivered at all. There is no clear explanation of what a reasonable expectation or period for delivery is and this imposes significant and unacceptable uncertainty. There can be no conclusion, in such circumstances, that infrastructure will be delivered when required and that the impact of development in the meantime will not be unacceptable.
While we note the amendment proposed, this should not result in unacceptable or severe impacts on the road network or the A320, including ST Peters Hospital, and nor should this skew the provision of employment and other services as part of the development, which are essential components in a sustainable community and ensuring that journeys are minimised.

The clarification of the definition of affordable housing should comply with that set out in the NPPF.

While clarification of the approach to custom and self build is supported, consideration should be given to this being a form of affordable homes ownership that diversifies supply and is appropriate on exception sites in accordance with the NPPF. The inclusion of custom and self build on larger sites must however, take account of the need for safe site access and consistent duty of care requirements for health and safety, which normally precludes unregulated access on construction sites and suggests a zoning approach to specific self build locations.

We are willing to discuss any or all of the above and would wish to take part in any discussion on the main modifications stage.

Yours sincerely