



The Planning Inspectorate

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# **Report to Runnymede Borough Council**

**by Mary Travers BA(Hons) Dip TP MRTPI**

**an Inspector appointed by the Secretary of State**

**Date: 28 May 2020**

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

## **Report on the Examination of the Runnymede 2030 Local Plan**

The Plan was submitted for examination on 31 July 2018

The examination hearings were held in November 2018, February and November 2019

File Ref: PINS/Q3630/429/10

## Abbreviations used in this report

DERA	Defence Evaluation and Research Agency
dpa	dwellings per year
ELR	Employment Land Review
GA	General Area
ha	hectare(s)
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
LGV	Longcross Garden Village
MM	Main Modification
NPPF	National Planning Policy Framework
OAN	Objectively Assessed Need
pa	per year
PPG	Planning Practice Guidance
SANG	Suitable Alternative Natural Green Space
SEA	Strategic Employment Area
SHMA	Strategic Housing Market Assessment
sqm	square metre
SSMA	Site Selection Methodology Assessment
TBH SPA	Thames Basin Heaths Special Protection Area

## Non-Technical Summary

This report concludes that the Runnymede 2030 Local Plan (the Plan) provides an appropriate basis for the planning of Runnymede Borough, provided that certain main modifications are made to it. The Council has specifically requested that I recommend any main modifications necessary to enable the Plan to be adopted.

The main modifications all concern matters that were explored through the examination. The Council prepared a schedule of the proposed modifications, many of which are based on suggestions it put forward at submission or during the examination, and the Council carried out sustainability appraisal and Habitats Regulations Assessment of them. The schedule of main modifications was subject to a 6-week period of public consultation. Having regard to the consultation responses, in some cases I have amended the detailed wording of main modifications and added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Confirm the rationale for the Plan period;
- Set out the Council's commitment to review the Plan and its timescale, commencing in early 2021;
- Confirm the average annual housing requirement and update the net additional provision for housing and other uses, housing land supply figures and trajectories for the Plan period to reflect the latest evidence;
- Clarify the approach to site delivery in the A320 corridor and particularly at Longcross Garden Village;
- Amend site allocation policies to specify necessary infrastructure and mitigation measures, the expected timing of delivery, and make other changes to ensure that they are justified, effective and consistent with national policy;
- Add a new policy allocation at Strodes College Lane, Egham;
- Update and amend policy provision to meet the needs of Gypsies, Travellers and Travelling Showpeople for consistency with national policy;
- Clarify the basis for considering proposals for older people's accommodation;
- Amend policy for self and custom-build housing to reflect local need;
- Amend policy to ensure effective delivery of the Thames Basin Heath's Delivery Framework;
- Clarify the approach to delivery of the River Thames Scheme;
- Clarify the National Planning Policy Framework (NPPF) context for the Plan and where appropriate, align its policies more closely with NPPF 2019, and
- Make various other changes to ensure the Plan is up-to-date, internally consistent, justified, effective and consistent with national policy.

## Introduction

1. This report contains my assessment of the Runnymede 2030 Local Plan (the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the other legal requirements. The National Planning Policy Framework 2012 (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The revised National Planning Policy Framework (NPPF) was published in July 2018 and further revised in February 2019. It includes a transitional arrangement in paragraph 214 which indicates that, for the purpose of examining this Plan, the policies in the 2012 NPPF will apply. Similarly, where the Planning Practice Guidance has been updated to reflect the revised NPPF, the previous versions of the Planning Practice Guidance apply for the purposes of this examination under the transitional arrangement. Therefore, unless stated otherwise, references in this report are to the 2012 NPPF and the versions of the Planning Practice Guidance that were extant prior to the publication of the 2019 NPPF.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Runnymede 2030 Local Plan, submitted in July 2018, is the basis for my examination. It is the same document as was published for consultation in May 2018.

## Main Modifications

4. In accordance with section 20(7C) of the 2004 Act, the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were considered as part of the examination, are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
5. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal and Habitats Regulations Assessment of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light, I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

## Policies Map

6. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan.

When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as CD\_001B, CD\_001C and CD\_001D.

7. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, some of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to address this.
8. These further changes that will need to be made to the policies map were published for consultation alongside the MMs (the schedule of additional modifications sets out the changes to the adopted policies map that will be required, and Appendix 3 of the MM schedule shows the amended site boundary for Policy IE1 for the Plan's inset map, which will need to be reflected in the policies map).
9. In addition, updating of the policies map to reflect the current position regarding the Policy EE13 safeguarding for the River Thames Scheme in Thorpe Park (see Issue 7 below) will be necessary. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the necessary changes.

## **Assessment of Duty to Co-operate**

10. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council has complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
11. The Council has worked constructively, actively and on an on-going basis with the prescribed bodies and relevant organisations from the outset of plan preparation to identify and consider the strategic matters in a systematic, timely and outcome-focused manner. The scoping framework identifies the strategic matters as housing, Gypsies and Travellers, economic development, Green Belt, climate change, biodiversity and Thames Basin Heaths Special Protection Area, transport, flooding, infrastructure (including education, health, utilities, community and culture, open space and recreation), and minerals and the historic environment.
12. Commencing with the preparation of the scoping framework, regular updates on progress were published in tandem with each of the consultation stages on the Plan. For example, the January, May and July 2018 update statements show how the Council has continuously and rigorously reviewed progress on outcomes and identified where further work was still required to achieve outcomes in full. This reflects the on-going nature of plan making and plan review. I am satisfied that the Council has actively and effectively progressed outcomes on all the relevant strategic matters to the point where it was justified to submit the Plan for examination.

13. Member-level oversight has taken place throughout, and a critical review of the effectiveness of the co-operation work was undertaken in 2017. This resulted in a stronger emphasis on achieving Statements of Common Ground and Memoranda of Understanding with key partners, making every effort to resolve strategic issues that emerged during the plan's preparation. This is amply demonstrated in the evidence submitted with the Plan, including Statements of Common Ground with Spelthorne, Elmbridge, Woking, Windsor and Maidenhead and Surrey Heath Councils, Surrey County Council, and a Memorandum of Understanding with Slough Borough Council.
14. Particular attention has been given to joint evidence gathering and close co-operation with Spelthorne borough since it forms a housing market area (HMA) with Runnymede. This included the preparation and subsequent updating of a Strategic Housing Market Assessment for the two boroughs. Spelthorne's plan is at a less advanced stage than Runnymede's, and the extent to which housing need across the whole of the HMA will be met is not resolved by the Plan. However, this does not indicate that the legal duty has been failed. I consider the overall need for housing in Issue 1, including the extent to which the Plan has been positively prepared.
15. Other examples of effective cross-boundary working in the preparation of the Plan are the Council's engagement in strategic partnerships for the Thames Basin Heaths Special Protection Area, the Heathrow Strategic Planning Group, the River Thames flood alleviation scheme, and the Local Strategic Partnership for Surrey. These and other strands of co-operative working have continued since the Plan was submitted, reflecting the on-going nature of the strategic matters and realistic timescales for achieving positive outcomes.
16. Overall, I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

## **Assessment of Soundness**

### **Main Issues**

17. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified 9 main issues upon which the soundness of the Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy or policy criterion in the Plan.

### **Issue 1 – Is the Plan soundly based on robust, objective assessments of the need for housing and employment land?**

#### *Preliminary Matter*

18. NPPF states that plans should be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer-term requirements, and be kept up to date. The Plan covers the 15-year period 2015-2030, but it will have a horizon of about 10 years from the date of its adoption. While this is not ideal, for the reasons set out in Issue 2 below I have concluded that the Council's decision during the plan preparation stage to bring forward the end date of the Plan to 2030 is justified.

### *Objectively Assessed Need for Housing*

19. The Plan's housing requirement figure of 7,507 dwellings for the period 2015-2030 is informed by the Runnymede-Spelthorne Strategic Housing Market Assessment 2015 and its Partial Update in 2018 (collectively referred to as the SHMA in this report). The SHMA seeks to establish the objectively assessed need for housing (OAN). This approach is acceptable, given the transitional arrangement that applies to the Plan.
20. There is no substantive reason to question the definition of the HMA as comprising the boroughs of Runnymede and Spelthorne. While there are complex sets of relationships in housing market geography across Surrey and the fringes of London, the two boroughs share the strongest relationships and correlation in market and behavioural terms. Also, there can be reasonable confidence that cross-boundary working with a wider group of Surrey and Greater London authorities will continue to address other important interactions and linkages across this part of the South East.
21. Spelthorne's timetable for submission of its new local plan indicated that it would be expected to use the standardised methodology for assessing housing need instead of a SHMA. As a result, although both Councils originally commissioned the update of the SHMA, it was reasonable for Spelthorne to decide not to proceed with the originally commissioned work.
22. While the scope of the 2018 update was reduced commensurately, it was prepared in consultation with Spelthorne, it provides updated figures for housing need in that borough as part of a rounded analysis for the HMA, and Spelthorne confirmed that it has no concerns about its content. I am satisfied that this approach has been reasonable and robust and that the Plan has been positively prepared in this respect.
23. The SHMA's starting point was the 2014-based household projections which were the most up-to-date available at that time. It applied sensitivity testing to refine the starting point figure, including 'part-return to trend' for household formation for the 25-34 age group, other migration scenarios and the Greater London Authority's projections that are based on longer term trends. In this light, an upward adjustment to the demographic need figure was appropriately made to take account of the potential suppression of household formation rates in the younger population. Thus, it concluded that the demographic need is 446 dwellings per year (2016-2030)<sup>1</sup>.
24. This projection has been tested against scenarios for economic growth in the borough, drawing on forecasts from Oxford Economics and Cambridge Econometrics and on the Council's expertise. Activity rates, commuting trends, the potential economic impact of the proposed growth at Heathrow and other local factors have been sensitivity tested as part of SHMA. Even at the top end of the range of forecasts for jobs growth in the borough, the demographic-led

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<sup>1</sup> The period 2016-2030 relates to the period of household growth projections set out in the 2018 SHMA, whereas the Plan period is 2015-2030. The OAN figure for the Plan period has been derived from 14 years (2016-2030) of the OAN figure as projected in the 2018 SHMA and one year (2015) of the OAN as projected in the 2015 SHMA (which covered the period 2013-2033).

housing need exceeds the jobs-led need and thus does not indicate that an uplift in housing provision is required to support the economy. The demographic and economic elements of the assessment are robust and convincing, and they are consistent with the findings of the more recently published Joint Evidence Base and Infrastructure Study (October 2018) concerning the expansion of Heathrow as proposed at the time. It would not have been justified to delay the Plan to provide in more detail for any potential Heathrow-related growth. This will be for plans to consider in the future.

25. Market signals and the complexity of the relationship between the demand and supply sides of affordable housing have been considered in the SHMA. On the balance of the evidence it was concluded that a 20% uplift of the baseline demographic need figure would help to improve affordability, and this results in a finally adjusted OAN figure of 7,507 dwellings for the Plan period. There is no convincing case that a greater uplift would result in enhanced affordability in the borough, and it would be likely to entail an element of double counting. The 20% uplift is proportionate and justified.
26. The specific needs for affordable housing and other types of accommodation and the overall housing requirement are considered elsewhere in the report; but in summary, I find insufficient justification for uplifting or reducing the OAN or housing requirement figures, having regard to the whole range of factors that are relevant in these matters.
27. During the examination, the 2016-based household projections were published. They indicate a significant reduction in the level of housing need in the borough. However, there are uncertainties about using the updated projections as a basis for plan making and I agree with the Council that the OAN figure derived through the SHMA should be relied upon and provides an element of flexibility. Also, in March 2020 new sub-national population projections were published but I consider that their implications are a matter for review in the future and they do not justify delaying this Plan's progress.
28. In conclusion on the OAN for housing, there is inevitably an element of judgement in applying the various adjustments that were examined in the SHMA. Nonetheless, they are clearly informed, expert judgements that make adequate allowances for uncertainty and offer some flexibility for changes that may occur during the Plan period. I am satisfied that they are reasonable. In conclusion, the Plan's identification of 7,507 dwellings (500 dwellings per year) (2015-2030) as the OAN for housing is robust. The justification for the overall spatial strategy, including the housing requirement and other growth that is proposed in the Plan, is considered in Issue 2.

#### *Need for Employment Land*

29. The need for employment land has been assessed in the Employment Land Review (2016) and more recently in the SHMA update (2018). These are robust studies that take account of labour supply and demand, past take-up rates, a range of economic forecasts and the most up-to-date population and household projections available at the time. The SHMA update considers a range of economic forecasts (thus providing sensitivity testing of the Employment Land Review which used Experian forecasts), as well as scenarios based on the future supply of labour and past trends in completions.

30. I agree with the conclusion of the SHMA update that the Oxford Economics forecast is the most appropriate of the econometric forecasts for labour demand as it shows positive growth (0.7% per year) and is consistent with positive planning. The labour supply scenario, which aims to align future housing and employment land needs, indicates a higher level of need for employment land than the labour demand scenario. It implies a more ambitious economic growth rate of 0.9% per year, but it is reasonable, based on past trends. The completions trend scenario indicates the lowest level of overall need for employment land. However, it entails a risk of modelling forward constraints in the past supply and the Council has reasonably concluded that it does not provide a sound basis for the Plan.
31. The Plan seeks to meet the identified total need for office and industrial floorspace, including a 5-year flexibility margin, for the range between the labour demand and labour supply forecasts. The range is approximately 66,000-84,000sqm of Class B1a/B1b space, and 21,000-29,000sqm for Class B1c/B2/B8 uses (2015-2030). These are robustly derived targets and they provide for an aspirational but realistic approach to meet future economic needs in the borough over the Plan period. Also, they have been informed by joint working with the Council's duty to co-operate partners and other sub-regional bodies and there has not been a request for the borough to accommodate the needs of other local authorities through this Plan.
32. While a significant change in the economic outlook has come about in recent months, its implications for the borough will be best considered in the review of the Plan in due course. I am satisfied that the employment land targets are justified and positively prepared. On-going work with the bodies referred to above, including the Local Enterprise Partnership and the strategic planning group dealing with the proposals for expansion at Heathrow, will provide an updated framework for review of these targets in the future. The Plan's provisions for the supply of employment land, including market factors and the adequacy of the existing stock, are considered in Issue 5 below.

### *Conclusion*

33. In conclusion, having taken all the evidence into account, I am satisfied that the Plan is soundly based on robust, objective assessments of the need for housing and employment land.

### **Issue 2 – Is the Plan period justified; in principle are there exceptional circumstances for altering the boundaries of the Metropolitan Green Belt, and is the Plan's overall spatial strategy and the housing requirement which it seeks to meet sound?**

#### *The Plan Period*

34. Runnymede is a small borough with a distinctive set of strengths and weaknesses, opportunities and threats. It is an attractive place to live, work and visit, has a strong local economy and is highly accessible by a range of modes of transport to strategically important centres of employment, services and facilities in the wider region. However, much of its area is constrained by policy designations and/or environmental factors that significantly limit the opportunities for new development.

35. Against this background and following the withdrawal of the draft Core Strategy in 2014, it is particularly important that out-of-date policies for Runnymede are replaced and that progress is made in planning positively for the borough's future needs in a sustainable way. As referred to above, Runnymede's population is expected to grow significantly over the Plan period. There is a pent-up need for housing, especially affordable housing, key infrastructure and new job opportunities.
36. Therefore, the Council's starting point, to plan for meeting in full its housing and other needs for the 20-year period 2015-2035, was the correct one and in accordance with national planning policy. Its preferred strategy for achieving this is to provide most new homes in existing urban areas and on previously developed land in the Metropolitan Green Belt (hereinafter referred to as the Green Belt), and with limited releases of other land from the Green Belt where this would not prejudice its purpose or integrity.
37. However, in the light of the updated assessments of needs, land availability, the nature and extent of the borough's environmental constraints, and having carried out a review of the Green Belt boundary, the Council concluded that the full housing need for 2015-2035 could not be accommodated within the borough without causing unacceptable harm to nationally important policy and environmental purposes.
38. In accordance with the duty to co-operate, the Council therefore sought assistance with meeting its needs from neighbouring local authorities, but as the evidence sets out, these authorities have confirmed that they are unable to do so. The position in Spelthorne is particularly important in this regard. It shares a housing market area with Runnymede, the review of its adopted plan is less advanced, and while there has been positive engagement between the two Councils during the preparation of the Plan, there was no evidence that Spelthorne could assist with meeting Runnymede's needs up to 2035.
39. Taking all of the circumstances into account, I agree with the Council that it had 3 main options; i) it could set a constrained housing requirement that would be significantly below the objectively assessed need for the period up to 2035, or ii) it could shorten the Plan period, seek to meet the full housing requirement for that period, accelerate the delivery of the allocated sites and plan for an early review, or iii) it could seek to bring forward a new spatial strategy.
40. The Council's reasons for choosing the 2<sup>nd</sup> option are well-founded and sound. It addresses the pressing need for a plan-led approach to increase the supply of housing in Runnymede in the short-medium term and lay down a framework for key infrastructure provision. Also, it is consistent with the on-going work by the Local Strategic Partnership to develop a longer-term, joint approach to growth in Surrey, especially to consider the implications for the Green Belt. It would be in the interests of positive planning to address this as part of the first review of the Plan rather than delay the progress of the plan that is before me.
41. Therefore, the time horizon of the Plan (2015-2030) is justified. **MM7** confirms the Council's rationale for reducing the Plan period and is necessary for a positively prepared, justified plan. However, in the light of the consultation on

the MMs and economic changes, I have amended MM7 to make explicit the Council's commitment to, and timescale for, review and I return to this in Issue 9.

### *Exceptional Circumstances for Alterations to the Green Belt Boundary*

42. NPPF makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of a local plan. It does not define what might constitute an exceptional circumstance but the Housing White Paper (February 2017) stated that all other reasonable options for meeting identified needs should first be fully explored and it gave examples of these. The revised NPPF 2019 incorporated the White Paper's proposals in this regard, although this post-dated the submission of the Plan.
43. Taking the material considerations and relevant case law into account, the Council has assessed all other reasonable options for meeting identified needs, working with neighbouring authorities in this process. It has provided robust, credible evidence demonstrating that brownfield opportunities including under-used land and buildings, estates regeneration, optimisation of densities, and use of surplus public sector land are being pursued actively, continuously and effectively. This includes direct intervention through the acquisition and development of brownfield land in the town centres, recently implemented town centre regeneration schemes, and the proposed allocations and Opportunity Areas in the Plan.
44. It is on this basis that the Council reached a view that there are 5 key factors that amount to exceptional circumstances to justify amendment of the Green Belt boundary in the Plan. I deal with these in turn below.
45. Firstly, as indicated above, Runnymede is a very heavily constrained borough. Government has identified it in the top 6% of local authorities in England with the highest amount of constraints affecting its land area. Of its total area of 7,803 hectares (ha), 79% is designated as Green Belt. Also, the River Thames and other watercourses and lakes are key features of the borough, and flood risk is a significant factor, with 29% of the borough and 35% of its urban areas lying within flood zones 2, 3a or 3b.
46. In addition, most of the borough lies within the 400m-5km protection zone for the Thames Basin Heaths Special Protection Area (TBH SPA), a small area is within the 400m zone, and the wider 5km -7 km zone for larger developments covers all but the smallest extremities of the borough. The requirement for Suitable Alternative Natural Green Space (SANG) to be provided in mitigation of the impact of new housing development within the 400m-5km zone is a significant factor that affects the borough's developable area.
47. Lands within Windsor Forest and Great Park Special Area of Conservation also lie within the borough and, in total, it has about 1,000ha that are covered by nature conservation designations. In addition, there are large swathes of land that are designated as open space, best and most versatile agricultural land, or minerals or waste sites. Taking all of this into account, it is estimated that only 1,156ha of the borough's urban area is suitable for development and that it could accommodate only about 2,100 new homes.

48. Secondly, as concluded above, there is an identified need for 500 dwellings per year in the borough during the Plan period. Over the period 2008/2009-2017/2018, an annual average of only 243 dwellings has been delivered. Based on the 2018 Strategic Land Availability Assessment, the annual delivery rate of homes within the existing urban area is likely to decrease to about 161, amounting to only 32% of the identified need. In addition, there is a significant requirement for pitches and plots to accommodate the needs of Gypsies and Travellers and Travelling Showpeople (see Issue 6). In summary, there is a pressing need to identify suitable land to house the borough's residents, together with employment and community facilities.
49. Thirdly, the detailed boundary of the Green Belt was established in 1986. Since then, development has rendered some parts of the boundary illogical or indefensible, and discrepancies have come to light that need to be corrected. Furthermore, national planning policy on villages that are 'washed over' by the Green Belt has altered since 1986, and it is necessary to review whether the policy framework for the borough's Green Belt villages remains sound.
50. Fourthly, a specific need has been identified for expansion of St Peter's Hospital, Chertsey, to cater for the increased population in its catchment area. The complex is defined as a Major Developed Site in the extant local plan. Also, a case for releasing part of the site from the Green Belt for residential development in order to fund improvements to the hospital has been made out, and therefore it is necessary to review the Green Belt boundary here.
51. Fifthly, as referred to earlier, neighbouring authorities are unable to help address the unmet needs of Runnymede.
52. NPPF states that in reviewing Green Belt boundaries, consideration should be given to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. The Plan has a relatively short time horizon and it does not safeguard land for future development needs in the longer term.
53. Nonetheless, in the light of all the factors affecting Runnymede, I consider the longer-term needs can best be addressed by a Surrey-wide approach, as committed to by the planning authorities. This will enable full account to be taken of the nature of the Green Belt in Runnymede and other districts and its importance in protecting the regional function of the wider Green Belt.
54. Furthermore, Runnymede's Green Belt is part of the first substantial area of open land on the south-western edge of London, and much of it is fragmented in nature. It would not be in the interests of sustainable development of the borough or its surroundings to seek to pre-judge the outcome of a joined-up approach on this fundamentally important spatial policy for the wider area.
55. In conclusion, for the reasons set out above, there is compelling evidence that in principle, exceptional circumstances exist which justify altering the Green Belt boundary in the Plan. In particular, it is justified to seek to meet as much of the housing need as possible, including the needs of Gypsies, Travellers and Travelling Showpeople. The robustness of the Green Belt review and the justification for the specific changes to the boundary that are proposed in the Plan are considered elsewhere in the report.

### *Overall Spatial Strategy*

56. The spatial strategy rests on a comprehensive, detailed, up-to-date and robust evidence base that includes assessments of potential impacts on the natural and built environments, human health, infrastructure, flood risk, air quality, and on the purposes served by the Green Belt<sup>2</sup>. It seeks to deliver the spatial vision for Runnymede, set out in paragraph 5.6 of the Plan, which includes a borough that is resilient to, and mitigates climate change impacts in various ways.
57. As the strategy evolved it was subject to an iterative process of sustainability appraisal which tested the preferred overall level of growth, spatial distribution and site selection options against reasonable alternatives. I am satisfied that the appraisal process was systematic, thorough and clear, the professional judgement involved in the process was reasonable, and the alternatives tested were clearly different and meaningful as well as being realistic and deliverable.
58. Against this background, the Plan's spatial vision is expressed in a strategy that focuses most development over the Plan period in and around Addlestone, Chertsey and Egham, which are the 3 higher-order centres in the borough, together with the development of a new garden village in the Green Belt at Longcross which includes a significant element of previously developed land. Lower levels of growth are proposed for Virginia Water, Woodham/New Haw, Englefield Green and Ottershaw, reflecting their roles in the settlement hierarchy.
59. This strategy seeks to maximise the potential for regeneration of the higher-order centres, direct growth to locations that benefit from the greatest concentrations of services and facilities with the highest levels of accessibility by sustainable modes of transport, while minimising the proposed loss of Green Belt land in meeting the identified needs for homes and employment.
60. It was essential to assess spatial options that can be served by the A320 corridor, given its strategic role in terms of accessibility and notwithstanding that several of its junctions between Woking and Junction 11 of the M25 are operating over capacity. The A320 serves Runnymede's most sustainable locations for growth in the east of the borough which benefit from the greatest concentration of services and facilities including strategic employment sites.
61. The Plan's implications for traffic growth and highway safety on the A320 and on the M25 have been thoroughly assessed, together with the necessary mitigation measures, so far as it is reasonable to do so for the purposes of the Plan. This includes the additional evidence that was brought forward during 2019 and the Statement of Common Ground with Highways England which

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<sup>2</sup> The evidence base includes the centres hierarchy report, town and local centres studies, employment land review, strategic land availability, site capacity and site selection methodology assessments, Level 1 and Level 2 strategic flood risk assessment, water cycle studies, and assessments of air quality, landscape character, infrastructure needs, transport networks, retail and town centres, leisure, recreation and tourism, and viability, as well as the Green Belt Review and sustainability appraisal and Habitats Regulations assessments.

was agreed in September 2019. The strategic highways considerations are dealt with in Issue 8 below and I conclude that the Plan is deliverable and sound in this regard.

62. The proposed strategy is also supported by the findings of Habitats Regulations Assessment, including Appropriate Assessment where necessary. For compliance with the Habitats Regulations, the spatial strategy should not give rise to harm to the integrity of the internationally designated sites in the borough. In the case of TBH SPA, the provision of Suitable Alternative Natural Green Space (SANG) is the nationally agreed measure to protect this important interest.
63. The Council has worked closely with Natural England and other stakeholders on comprehensive proposals to ensure that SANG of adequate quantity and quality will be available where and when it is required. The up-to-date evidence provided during the examination leads me to conclude that this is likely to be secured and, given the provisions of Policy EE10 to which I return later, the Plan will not have an adverse effect on the integrity of the SPA, either alone or in combination with other plans and projects.
64. The potential for any adverse effects on the Thursley, Ash, Pirbright and Chobham Special Area of Conservation and on the Windsor Forest and Great Park Special Area of Conservation were also assessed in accordance with the Regulations. I am satisfied that the same conclusion is justified, that the Plan, either alone or in combination, will not have an adverse effect on their integrity. However, paragraph 5.13 of the Plan should be modified by **MM4** to refer to the correct regulatory framework for protection of internationally designated nature conservation sites.
65. In reaching a balanced judgement on the preferred spatial strategy, the Council has fully considered the need to minimise flood risk and has applied a sequential, risk-based approach in accordance with national planning policy. Although the focus of planned development is in the eastern part of the borough, which contains areas at the highest risk of riverine flooding, I agree with the Environment Agency that, in this respect, the proposed allocations are sound in principle.
66. Subject to the approval of detailed proposals at the planning application stage, the Plan will ensure that new development is directed away from land that is most at risk of flooding. Also, there is no evidence that delivery of the Plan's growth strategy is subject to construction of the River Thames Scheme for flood protection in and around the borough, which is due by 2028/2029.
67. The Green Belt review was undertaken as a series of complementary studies and carried out in stages that examined it first at a strategic level, and then at a more fine-grained level to assess the performance of smaller parcels of land against Green Belt purposes; the studies also included a Green Belt Villages review and a technical review of the Green Belt boundaries. The overall process took account of good practice advice from the Planning Advisory Service, comparator studies carried out by other local planning authorities whose plans were found sound, and Landscape Institute advice on landscape visual assessment.

68. I consider the robustness of the Green Belt review and the justification for the proposed release of land in more detail in Issues 3 and 4 below in relation to the Plan's site allocations. In summary, I have concluded that the review was comprehensive, systematic and based on a robust, consistently applied methodology that properly reflected local circumstances and the unique characteristics of the borough in assessing how the Green Belt serves the purposes laid down in national planning policy.
69. The review responds to the Council's strategy to only consider sites for release from the Green Belt that can be shown to perform most weakly against the purposes of including land within it. This is a justified approach which is consistent with national planning policy by ensuring that maximum protection is given to the Green Belt. And in this and all other respects, I have concluded that the approach to the Green Belt review and the basis on which the Council selected the Plan's spatial strategy accords with the Calverton judgement.
70. Furthermore, the methodology was developed in a systematic and rigorous way, working with the surrounding local planning authorities and taking account of responses to the published evidence and the Issues, Options and Preferred Approaches consultation (Regulation 18). The assessment criteria and scoring matrices are clearly explained and justified and the scores for each Green Belt purpose were rightly considered individually, given the importance of understanding the roles that different areas of land play in serving particular purposes at the strategic and local scales.
71. Purposes 4 and 5 as set out in paragraph 80 of NPPF were excluded from the assessment for good reason; purpose 4 is not relevant to Runnymede and the settlements immediately beyond the borough's boundaries, and purpose 5 applies to all parts of the Green Belt to the same extent and has already been taken into account before identifying any potential need to release land from the Green Belt. And as part of the more fine-grained assessment carried out in the Stage 2 review, the definition of buffers around settlements was carefully considered, informed by the nature of the borough's Green Belt, and was a proportionate, suitably focused and justified approach.
72. The review did not seek to balance Green Belt purposes with other sustainability objectives; correctly, the Council considered the balancing exercise within the wider context of all the site selection evidence, and it has set out its reasons for selecting the allocations in the Site Selection Methodology Assessment (SSMA). In a very limited number of cases the Council disagreed with the recommendations of the Green Belt review, which was carried out by consultants, and its reasons for doing so are explained in the SSMA. Based on all the evidence and my site visits, I have found that the Council's conclusions are reasonable and justified.
73. Regarding the Plan's evidence base, it is important to bear in mind that the iterative assessment and appraisal processes in plan making inevitably require the application of planning judgement. This may include attributing more weight to some objectives than to others. Adequate reasons have been given by the Council for the selection of its preferred spatial strategy compared with the reasonable alternatives. The comprehensive body of evidence that underpinned the draft Plan as it evolved through key stages has clearly sought

to achieve the right balance in the spatial strategy that will deliver sustainable development in the round, consistent with national planning policy.

74. I deal further with the adequacy of the supporting evidence for the selection of the site allocations in other parts of the report. So far as any errors may have arisen in the site assessments, there is no substantive evidence that they led to the selection of a different spatial strategy or site allocations than would otherwise have been selected. Nor have I found good evidence to conclude that an alternative strategy and the allocation of alternative sites would perform significantly better than the chosen approach as expressed in the Plan.
75. The Plan does not close down options for a higher level of growth in the future, subject to testing across a wider area and including a strategic review of the Green Belt. Also, there is no convincing evidence that the Plan should do more to help meet overspill needs from London, taking the level of constraints in the borough into account. Furthermore, I have found no substantive evidence that the Green Belt review was artificially limited to provide only for the requirement figure to be met. The justification for the delineation of the new boundaries of the Green Belt is considered elsewhere in the report.
76. In summary, I am satisfied that the Plan sets out a sound spatial strategy that takes full account of the nature and context of the borough and is consistent with the overall thrust of national planning policy. However, **MM1** is necessary to provide an up-to-date description of national planning policy in paragraph 2.9 of the Plan, having regard to the publication of NPPF 2019. Also, **MM5** is required to make explicit which of the Plan's policies are strategic or non-strategic, in accordance with NPPF. And to avoid unnecessary repetition of national policy within the Plan, **MM6** deletes Policy SD1, which reflects the presumption in favour of sustainable development in NPPF.

#### *The Housing Requirement*

77. Taking the above into account, the Plan's housing requirement of 7,507 dwellings (2015-2030) is justified by the evidence and is positively prepared. It meets the objectively assessed need for this period, and for the reasons set out elsewhere in the report, it is also deliverable, consistent with national planning policy, including for the protection of the Green Belt, and it provides for the protection of TBH SPA and other sites of international importance for biodiversity. Accordingly, **MM3** is necessary to update the total housing requirement figure and annual average figure in paragraph 5.7 of the Plan to 7,507 and 500 respectively.

#### *Conclusion*

78. In conclusion on this issue, I am satisfied that the Plan period is justified, there are exceptional circumstances in principle for altering the Green Belt boundary in the Plan, and the Plan's overall spatial strategy and the housing requirement which it seeks to meet are soundly based.

### **Issue 3 – Is the allocation for development of Longcross Garden Village sound?**

#### *Background Context*

79. Policy SD10 allocates land at Longcross for development of a garden village, including a minimum of 1,700 dwellings, a range of housing for specific needs, employment land, an hotel, and local retail and community services including a primary school. The vision statement in the Plan seeks a highly sustainable mixed-use community, with unique local employment opportunities through the designated Longcross Park Enterprise Zone, and a development of the highest quality which encompasses garden village principles within a characteristically wooded Surrey setting.
80. The proposed Longcross Garden Village (LGV) lies within the Green Belt and is partially within 400m of the TBH SPA and the Thursley, Ash, Pirbright and Chobham Special Area of Conservation. Most of the proposed village comprises the former Defence Evaluation and Research Agency (DERA) site, as well as the former Longcross Barracks site. The DERA site is designated as a Major Developed Site in the extant local plan.
81. The allocated land comprises 2 parcels, to the north and south of the M3 motorway. They have a lengthy planning history, which includes Certificates of Lawful Use for Class B1 and ancillary minor uses, a test track for military vehicles, driver training, film and media and other uses. Planning permissions were granted in 2011 and 2014 on the parcel to the north of the M3 (described as Longcross North) for Class B1 uses and a mix of ancillary A-class and D-class uses, residential (2014), data centre (sui generis) and other development. Following an unsuccessful legal challenge, some of the approved development has been constructed or is underway. Crest Nicholson and Aviva control the vast majority of the site and are referred to as the site developer.
82. Policy LF6 of the South East Plan 2009 identified the former DERA site for large-scale, mixed-use development, the precise scale of which was to be tested through local plans. However, the South East Plan was revoked in 2013 except for Policy NRM6 concerning the protection of TBH SPA. The site was allocated in the draft Core Strategy 2014 which was subsequently withdrawn. In January 2017 the Government included Longcross in its statement of support for the first tranche of locally led garden villages, with funding to assist the delivery of the project.

#### *Green Belt Review and Site Selection*

83. While the proposals for LGV in the Plan have come forward against the background summarised above, the evidence leads me to conclude that the allocation was not pre-determined. It has clearly emerged from the robust processes of assessment that underpin the whole Plan and its specific proposals.
84. Following on from the withdrawal of the draft Core Strategy and as referred to above, a comprehensive, systematic, rigorous review of the entire area of the borough's Green Belt was undertaken in two main stages. No area within the Green Belt was omitted or pre-determined. Longcross was looked at afresh, and its role was considered alongside all other lands outside the built-up areas

in terms of its contribution to the Green Belt and its performance against all other potential sites in the Site Selection Methodology Assessment (SSMA).

85. Through the phases of Stage 1 of the Green Belt review, the parcels of land classified as General Areas 21 and 22 (GA21 and GA22) which encompass the land eventually defined as the LGV allocation, were assessed, refined and further refined on the same basis as all other General Areas. The potential for release of land here that would provide permanent, durable boundaries to protect against urban encroachment into the surrounding parts of the Green Belt was clearly considered in Stage 1. The conclusion that scope may exist here to release land was reasonable and justified in the light of the comprehensive evidence.
86. Further phases of the assessment considered whether absolute or non-absolute constraints affected the potential releases. And in refining the areas for consideration, the review work revisited the land's role in the functionality of the Green Belt and its strategic fit with the existing settlement hierarchy. This led to the identification of Resultant Land Parcels within GA21 and GA22 which could be considered further for release from the Green Belt.
87. On this basis it was justified to conclude from Stage 1 of the review that the merits of a potential allocation at Longcross should be scrutinised further through the other site selection processes including the SSMA, sustainability appraisal and Habitats Regulations Assessment. This provided for testing of the wider sustainability of potential development at Longcross in the context of the most appropriate overall spatial strategy for the borough. The process also ensured that consideration was given to the effects of development on the wider swathe of Green Belt between Runnymede and Surrey Heath, particularly the effect of any development to the east of Kitsmead Lane.
88. The SSMA erroneously records one of the scores for GA22 but this had no effect on its overall score and does not invalidate the staged process of assessment that led eventually to the allocation of LGV. Given their scores against the relevant Green Belt purposes, it was justified and consistent with the Green Belt review's methodology to explore further the potential of the refined General Areas GA21 and GA22 for release from the GB.
89. Moreover, it would have served no purpose to consider further the Resultant Land Parcels in GA21 and GA22 in Stage 2 of the Green Belt review before scrutinising them through the SSMA and the other site selection processes. Stage 2 was a complementary but separate piece of work from Stage 1. It entailed more finely grained work that sought to better understand the performance of smaller parcels of land against Green Belt purposes and their context in relation to the whole of the Green Belt. This evaluation had in effect been carried out already through Stage 1 in identifying the parts of GA21 and GA22 that could form Resultant Land Parcels. Given that their combined area was large enough to be planned comprehensively as a new village, it would have been unreasonable and not in the interests of good plan making not to take them forward for testing on this basis.
90. It was logical, therefore, that the Green Belt Review Stage 1 findings on Longcross were fed into the relevant stages of the SSMA, and I am satisfied that the potential allocation was subject to the same assessment processes

through the SSMA, Site Capacity Analysis and sustainability appraisal process as were all the reasonable alternatives.

91. As I have concluded in Issue 2, these processes have resulted in a robust, comprehensive and transparent evidence base for the Plan. It is inevitable that some elements of the assessments rely on planning judgement, but they are credible, generally based on the most up-to-date information available at the time and on proportionate evidence, including the potential to mitigate adverse impacts to an acceptable level.
92. In particular, the SSMA and sustainability appraisal have adequately addressed the likely effects of LGV on an appropriate range of factors, and especially its accessibility and its role in delivering sustainable development. The quantity of development and mix of residential, employment, community and other uses that are proposed for the new village would help underpin significant improvements in accessibility by sustainable modes of transport.
93. Longcross rail station (on the London Waterloo to Reading line) lies on the northern edge of LGV and is a significant advantage of this allocation even though certain improvements are needed, to which I return below. Also, while the site is located on the western fringe of the borough, away from the main urban concentrations along the A320 corridor, much of it is previously developed land; and it provides a unique opportunity to meet large scale development needs in a high-quality village setting that will form an integral part of the sustainable development of Runnymede.
94. Furthermore, the potential impact of the allocation on the integrity of the wider, non-fragmented swathe of Green Belt between Runnymede and Surrey Heath has been explicitly considered in the site selection process. I agree with its conclusion that the impact will be limited, taking account of the location and extent of developed land on the site and the nature and/or extent of the separation that would be retained between LGV and the nearby settlements.
95. In reaching these conclusions, I have considered the relationship with Trumps Green and Virginia Water. At the narrowest point on the north-eastern edge of LGV, the separation from the developed area at Trumps Green would be only about 200m, taking account of the proposed housing allocation (Policy SL10) at Virginia Water South. On this edge, however, the railway line and M3 motorway form a strong physical boundary between LGV and Trumps Green, and the fundamental openness of the areas to the west of Beechwood Road and to the east of Kitsmead Lane will be retained. I refer further to this issue in my consideration of Policy SL10 below.
96. Therefore, while there is likely to be some inter-visibility between the developed area of Trumps Green/Virginia Water and LGV, the effect of LGV and the allocation of SL10 on the overall integrity of this part of the Green Belt will be limited and will not fundamentally undermine its purposes. High quality master planning and design of the north-eastern edge of LGV will help to minimise its impact on this part of the Green Belt.
97. The proposed boundaries of LGV to the north, east and south (the railway line, Kitsmead Lane, and Longcross Road (B386), respectively) are permanent, durable features that will define the limits of the village and protect the surrounding Green Belt from urban sprawl. To the west, the borough boundary

bisects developed areas of the site that lie east of Burma Road and it is reasonable that this is defined as the western boundary of the allocation in the Plan. However, there is no reason to doubt that in due course a permanent, durable western boundary along Burma Road and its continuation onto the B386 can be defined through the emerging Surrey Heath local plan, which will provide a defensible Green Belt boundary.

98. Taking all the evidence into account, the release of the LGV site from the Green Belt will not undermine its overall integrity or the fundamental purposes that it serves in this part of the borough. Also, durable, permanent boundaries for the site can be clearly defined that will prevent coalescence of settlements.
99. The proposed allocation has been properly informed by Habitats Regulations Assessment. The Plan makes clear that, due to the proximity of the proposed village to TBH SPA and the Special Area of Conservation, higher standards of SANG than 8ha per 1,000 new population will be required to avoid significant effects on their special interests, unless otherwise agreed with Natural England. Some of the requirement for SANG already has planning permission and is in place and, based on the layout proposals discussed with Natural England during the examination period, it appeared that a SANG rate of about 10.7ha per 1,000 new population would be achieved.
100. Furthermore, there is substantive evidence of on-going close working between the Council, Natural England and the developer on the quantity and siting of on- and off-site SANG and on the necessary measures for strategic access management and monitoring. This is supported by the Statement of Common Ground agreed between Natural England and the developer.
101. In summary, it is reasonable to conclude that the integrity of the TBH SPA and the Special Area of Conservation will be protected as part of the development of LGV. The allocation is justified in this respect. Detailed proposals for development will be subject to Appropriate Assessment in due course and will be guided by Policy EE10 of the Plan which deals specifically with TBH SPA.
102. As referred to above, there is an acute need for new homes in the borough, but it has a heavily constrained land supply. Given the major contribution that this largely brownfield site will make to meeting identified needs for housing, together with employment and community facilities, the contribution that will be made to recreational provision and environmental protection through the delivery of SANG, and that it will enable a high level of sustainable transport services including improvements to Longcross rail station, there is comprehensive and compelling evidence that exceptional circumstances exist for release of the LGV site from the Green Belt.

#### *Policy Objectives and Requirements*

103. The proposed development would entail an overall net residential density of about 24 dwellings per hectare, reflecting the vision for a garden village and ensuring that about 40% of the allocation is reserved for green infrastructure. Nonetheless, densities of about 30-50dph are expected to be achieved within sub-areas of the village. These are justified proposals, supported by the site capacity evidence, existing commitments and the developer's assessments in the preparation of a planning application for Longcross South (the southern part of LGV). Taking all the evidence into account, including statements of

common ground between the Council and the developer, there are reasonable prospects that the exemplar form of development envisioned for LGV will be achieved.

104. In accordance with Policy SD10 the residential component of the garden village will provide a mix of dwelling types and tenures, of which about 35% will be affordable housing, and an extra care facility in the order of 60 units. This will help to provide mixed and balanced communities and meet the need for specialist housing that is likely to arise over the Plan period. As noted during the examination, there may also be potential for additional specialist housing on the former Longcross Barracks site while taking account of its close proximity to the SPA. The policy also sets out that up to a maximum of 5% of non-specialist housing will be delivered on self/custom-build plots, if required to meet a need.
105. However, in order to be consistent with the definition of affordable housing in NPPF 2019, the general tenure split set out in the policy should be modified for effectiveness, since the current definition is the basis for decision taking (**MM22**). And having regard to the updated evidence on the need for self/custom-build plots, as considered in Issue 6 below, Policy SD10 should be modified for consistency with Policy SL24. Accordingly, I have amended criterion b) of Policy SD10 in MM22 as published for consultation. Also, the monitoring framework should be amended for consistency with the policy's requirement that a minimum of 1,700 dwellings will be delivered on the site (**MM62**).
106. The policy requirements for LGV include provisions for a substantial quantity of employment floorspace in the Longcross Park Enterprise Zone, an hotel and conferencing facilities, and a range of local facilities including a primary school, shops and other local services. The Enterprise Zone extends to about 19ha, is one of the largest strategic employment sites in the sub-region, and immediately adjoins Longcross rail station. Detailed proposals for the first of the office and data centre developments were well-advanced in late 2019, with completion of about 16,700sqm expected by 2024. The former DERA buildings within the zone are under the control of the developer and are in use as film studios on short-term leases or licences not exceeding 12 months. There is no evidence of any substantial impediment to redevelopment of this area for business use as part of the Garden Village in due course. And while it is about 5km from the strategic road network, given its accessibility by rail, planned improvements to bus/cycle access and with co-location of homes and jobs, the employment proposals will contribute to sustainable patterns of development.
107. While the village would not be large enough to sustain a secondary school, the infrastructure delivery plan indicates that the demand will be absorbed within local schools and it is likely to be serviced by the Council's Yellow Bus Scheme, given the demand from the village. This is a suitable, proportionate measure and it does not indicate that LGV will be unsustainable.
108. Primary health care services may be accommodated within the village, given the potential for co-location with other community facilities, and Policy SD10 expects that this will be secured through the planning process. Overall, the above shows that the objective of creating a sustainable community can be achieved, with easy access within the village to a range of daily needs.

109. So far as Longcross Station is concerned, the policy requires that permanent upgrades to it are secured through the development of LGV. Since December 2019, improvements now provide half-hourly stopping services Monday-Saturday and an hourly service on Sunday. Also, planned improvements to waiting facilities at the station are due to commence this year. However, the provision of a car park and new vehicular access to the station has yet to happen, pending on-going implementation of later phases of the Longcross North hybrid planning permission.
110. While earlier provision of these facilities would have been desirable, there is a reasonable expectation that they will be provided within the Plan period and that more sustainable travel choices will be made available for residents and workers in due course. In the meantime, an on-demand bus service is in place, which links the village with centres within a 6-mile radius as well as with Virginia Water railway station.
111. Overall, the Plan requires provision of sustainable transport links within and beyond the village. Priority for non-car modes of travel is part of the on-going master planning for LGV, and transport planning and financial investment to date are being directed towards improving sustainable access. However, for an effective plan, agreed traffic generation targets should be controlled through a s106 Agreement, and the phasing of development should be closely tied in with the provision of the necessary infrastructure.
112. Furthermore, it may not be necessary for all the walking and cycling links that will be provided as part of the development to be segregated. It should also be clarified that bus links with Woking as the nearest major service centre will be provided, but that the developer is not expected to fund bus services in perpetuity. Also, criterion e) of Policy SD10 should acknowledge that it may be possible to bring forward physical improvements on the A320 through delivery by the developer, since this could offer an effective way of expediting earlier implementation of the Plan.
113. Therefore, in order to be justified and effective, Policy SD10 should be modified accordingly. **MM22** incorporates the changes necessary to make this part of the Plan sound. Overall, as modified, the framework for transport and access laid down by the Plan gives reasonable confidence that a comprehensive, inclusive package of measures will be in place to support the sustainable development of the village over the Plan period.
114. So far as the other infrastructure requirements for a development of this scale and complexity are concerned, there is detailed, comprehensive evidence that assesses needs and capacity, and demonstrates close working with infrastructure providers and regulatory bodies. In this light, it is justified to conclude that the necessary services and facilities are likely to be available as required and that development of the village will not lead to harmful impacts on the environment or communities in the surrounding areas.
115. Policy SD10 as submitted requires at least 10 serviced pitches and/or plots in groupings of at least 3 pitches for Gypsies and Travellers. During the examination it became clear that the overall supply of pitches in the borough could exceed the need, while the shortfall in provision of plots for Travelling Showpeople would remain.

116. In order to help meet this shortfall, the Council put forward a modification to the policy to require instead that at least 10 plots be provided. While this would be likely to require a greater land take than the equivalent number of pitches, there is no evidence that it would be unachievable. There is a pressing need to identify plots for Travelling Showpeople in the borough, and in the absence of suitable, available sites elsewhere, Policy SD10 should be modified accordingly for a justified, positively prepared plan, and a consequential modification should be made to the monitoring framework. This is achieved by **MM22** and **MM62**.

#### *Viability and Delivery*

117. The viability of developing LGV has been explored throughout the stages of the Plan's evolution and particularly in reports in 2017 and 2019 and tested through a Development Market Panel. Overall, this indicates strongly that the proposal is viable and deliverable, while noting that the cost of additional 'garden village' elements as set out in the policy were not included in the viability modelling.

118. The extent of the viability 'cushion' will ultimately depend on a number of factors. These include construction costs, requirements for phasing of infrastructure provision, and the final dwelling mix and densities, which will be established in the detailed schemes for development that are approved in planning permissions in due course. Even so, the current evidence supports the conclusion that LGV can viably deliver the necessary contributions to strategic infrastructure improvements, including the A320 and SANG, and satisfy the Plan's policy requirements for a high quality, sustainable garden village.

119. A revised trajectory for housing delivery at LGV was considered at the hearing in November 2019, taking account of the updated evidence on the improvements required on the A320 corridor and at junction 11 of the M25. There is agreement in principle between the Council, the Highways Authority and the developer that there is scope to enable further housing completions at LGV in parallel with the delivery of the A320 improvement works, which are scheduled for completion by March 2024. This would be facilitated in part because about 62,000sqm of the committed employment development on the site is unlikely to be built out and occupied by 2024, and the additional traffic generation from new residential development at LGV up to 2024 could be offset accordingly.

120. This approach is reasonable in principle, bearing in mind my conclusions in Issue 8 about the A320 implications, and in Issue 5 on the employment land supply. While the quantity of employment floorspace referred to above is unlikely to be completed and occupied within the next 5 years, there is insufficient reason to expect this would have any significant impact on the sustainability of LGV or the Plan as a whole over the medium to longer term. Any offsetting of the employment and residential trips referred to above will need to take account of the relative effects on peak hour traffic on the road network, but this will be considered as part of the transport assessment.

121. The revised trajectory indicates that about 600 dwellings are capable of being delivered by March 2024, and that a total of 1,649 dwellings (excluding

completions and the contribution from Class C2 development) will be built out by the end of the Plan period. This is based on the developer's intention to submit a full planning application for the remainder of Longcross North and one for outline planning permission for Longcross South in the first half of this year, and to achieve an annual build rate of between 23 and 270 dwellings over the decade.

122. There are several positive factors that support this trajectory in principle. Runnymede is characterised by a strong housing market and has pent-up demand. The proposed house types and tenure mix in the next and final phases of development at Longcross North are likely to accelerate completion rates. The substantial experience of the developer in delivering large-scale projects and the attractiveness of the vision for the Garden Village also support the trajectory. And while the exact number of dwellings that can be occupied prior to the completion of the A320 mitigation works will be subject to the findings of detailed transport assessment, the estimate of about 600 appears reasonable.
123. Furthermore, there is clear evidence of a delivery-focused approach by the Council. While detailed work on technical matters, planning conditions and obligations will be necessary for approval of further development on the remainder of the site, planning performance agreements and on-going close working between the Council, the developer and key stakeholders on these matters will continue to facilitate delivery.
124. However, the trajectory shows the annual completion rate across LGV rising rapidly to 170 in 2021/22 and peaking at 270 in 2022/23 when Longcross North is expected to be built out and completions begin at Longcross South. Also, based on the evidence in late 2019, the developer was strongly of the view that delivery of an average of 160dpa over the remainder of the decade, with 3 or 4 outlets on the site, was achievable. But at this time, given the coronavirus pandemic, I consider that more caution is justified due to uncertainty about its impacts on the economy and the housing market.
125. Much will depend on good progress being made towards securing the planning permissions and provision of the essential infrastructure for the site's phased development following the adoption of the Plan. If this can be achieved, and the economy and the performance of the housing market over time supports it, there is a reasonable prospect that the Council and developer's expectations for build out of the site by 2030 can be realised. Notwithstanding this element of uncertainty about the timescale for delivery, it would not be justified to delay the Plan to re-consider the housing delivery trajectory for LGV in the light of the pandemic's implications (I return to overall housing delivery in Issue 9 below). The allocation is fundamentally sound, and it will play a significant role in the sustainable development of Runnymede over the Plan period.

### *Conclusion*

126. Provided that the main modifications recommended above are made, I have concluded that the allocation for development of Longcross Garden Village is sound.

**Issue 4 – Are the other proposed housing allocations sound? Are there exceptional circumstances that justify the proposed exclusion of Thorpe Village from the Green Belt?**

*Background*

127. The Plan's allocations of other sites for housing and associated development are also based on detailed evidence that assesses their availability, suitability and deliverability. The final selection of site allocations has emerged from an iterative process of assessment, including sustainability appraisal and Habitats Regulations Assessment, and public consultation has taken place at key stages in the Plan's evolution. The process followed was comprehensive, detailed, systematic and transparent, while also being proportionate for the purpose of plan making.
128. Furthermore, the detailed methodologies for assessment, including the consideration of absolute and non-absolute constraints, and accessibility by sustainable modes of transport, were reasonable and fit for purpose. The capacity and suitability of the sites for the proposed development has been assessed at a level that is reasonable and proportionate for the purpose of the allocation. The Plan makes clear that site-specific flood risk assessment, transport assessment and other detailed site-level assessments will be required where appropriate. Updated information about sites was taken into account where possible, and there is no substantive evidence that any factual errors in the site assessments fundamentally undermined the validity of the choices that were made.
129. Also, the Plan has been robustly tested for viability at a high level that takes account of the policy requirements, densities, dwelling mix, costs, residual land values and other factors. The allocations are clearly viable. The combined effects of the policies and proposals in the Plan will not put delivery of the strategy at serious risk.
130. There is named developer interest in many of the allocations, and given the underlying strength of the housing market, there is a reasonable prospect that they are deliverable in line with the housing trajectory, albeit that the wider economic uncertainties referred to above in the context of LGV apply to all the proposed development. The trajectory takes into account that delivery of some of the allocated sites will be subject to provision of the necessary works to mitigate the traffic impact on the A320, as considered elsewhere in the report.
131. The allocation policies set out the minimum capacity of the development that should be provided on the sites, in order to make the most efficient use of land while not causing harm to local character or distinctiveness. This allows some scope for increased capacities if circumstances change, such as an alteration in the development mix. This is a reasonable approach and it is supported by the site-specific assessments that informed the allocations.
132. Overarching requirements for a high standard of design, environmental protection and enhancement, nature conservation, provision of the necessary infrastructure and services and other matters that are essential for delivery of sustainable development are set out in the generic policies that apply to all development in the borough. Their soundness is considered elsewhere in the report, as necessary.

133. As concluded in Issue 8 below, I am satisfied that the infrastructure provision that is likely to be required to meet the needs of the borough's population over the Plan period has been properly assessed. The site-specific policies confirm any requirements for provision of essential infrastructure, including SANG and flood protection, and protection and enhancement of biodiversity.
134. Some of the site allocation policies require provision of pitches for Gypsies and Travellers, in order to help meet the need that is expected to arise. The proposals for the individual site allocations have been informed by the site capacity assessments and they indicate that the proposed number of pitches can be accommodated. The proposed distribution of pitches between the site allocations has been based on a qualitative analysis carried out by the Council, guided by criteria set out in the site capacity evidence, rather than a generic formula. Overall, this is reasonable and justified. The soundness of the proposed pitch numbers on specific allocations are considered below, where necessary.
135. Planning applications for development of the sites will be considered against the Plan's policies, taking full account of site-specific factors and the identified needs for Gypsy and Traveller accommodation at the time of the application. Considered in the round, in the light of the whole Plan viability evidence, it is unlikely that the requirement for the provision of pitches would make the Plan undeliverable. Policy SL22 deals with the overall need for Gypsy and Traveller accommodation and how it will be provided for; this is considered in Issue 6.
136. In some cases, sites that scored well on accessibility by sustainable modes of transport and other characteristics were not allocated for development because their impact on the purposes of the Green Belt was considered unacceptable by the Council. As referred to above, plan making necessarily entails the exercise of planning judgement. Having examined all the evidence, including the robustness of the methodologies and the consistency of their application in each case and seen the sites, I am satisfied that the conclusions drawn were rational and adequately explained. I refer to some of the alternative site proposals below. But in summary and for the avoidance of doubt, based on the evidence before me, there is inadequate justification for releasing additional housing sites from the Green Belt in this Plan, having regard to the harm that they would cause to the purposes that it serves.
137. The Plan's proposals have raised concerns about the loss of open areas of land that are much valued by local people, and about traffic impact, adequacy of services and other issues. I have taken these into account in each case. However, given all the evidence, I have concluded that the pressing need for housing and other development outweighs these concerns. Subject to the Plan's detailed requirements for the standard of development, the measures that are proposed to mitigate harmful impacts and provide for net gains in biodiversity, and the modifications that are recommended in this report, the Plan's proposals are sound.

### *Site-Specific Issues*

#### *Policy SL2*

138. Policy SL2 allocates land for a minimum of 40 dwellings at Brox End Nursery, Ottershaw. This site was safeguarded for long-term housing needs (post-

2006) in the extant local plan. It has outline planning permission for 40 dwellings.

139. Local residents dispute that there is a right to gain vehicular access to the site from Brox Lane, which is a private road. However, there is insufficient reason to doubt that the site is deliverable. The potential impact of additional traffic on the local road network and public safety has been considered by the Highways Authority and I agree with its view that satisfactory access arrangements can be secured, subject to a site-specific travel plan and transport assessment.
140. There is generally good accessibility from the site to a range of services and facilities by sustainable means of transport. The allocation will provide for much-needed new housing and the Plan lays down justified requirements for the protection of landscape and ecological interests that are relevant to the development.
141. However, modification of the policy requirements as set out in **MM23** are necessary for a justified and effective policy. These will facilitate alterations to be made to the rights of way network in the locality of the site, where this would improve accessibility, safety and/or attractiveness to users, and they clarify that financial contributions towards the provision of early years, primary and secondary school infrastructure will be required from the development, rather than seeking to tie the contributions to named schools. Subject to **MM23**, the policy is sound.

#### *Policy SL3*

142. Policy SL3 makes provision for residential development of at least 340 dwellings at Hanworth Lane in Chertsey. Detailed planning permission for 130 dwellings on the northern section of the land has been partially implemented. The site offers good accessibility to services and facilities and will make a significant contribution to meeting housing need.
143. Nonetheless, the detailed policy requirements for connectivity with the public rights of way network, provision for open space on the site and the relocation of a school playing field, and financial contributions towards off-site provision of recreational needs require modification. Also, the timing of future development should be subject to the delivery of the necessary mitigation works on the A320 and on other measures to mitigate traffic impacts on the local road and strategic road networks and promote sustainable transport. These modifications are required for clarity, a justified and effective Plan, and in order to make the most efficient use of urban land. **MM24** makes the necessary changes to the policy.

#### *Policy SL5*

144. Policy SL5 allocates land at Blays House, Blays Lane, Englefield Green for a minimum of 100 dwellings. The evidence supports this capacity, and a high-level assessment by the Highways Authority has not identified any concerns about the potential traffic impact. The site lies close to Englefield Green and Egham, and it offers good accessibility by bus to local services and service centres.

145. This proposed allocation lies within a broad swathe of the Green Belt that includes several large parcels of land, interspersed with pockets of residential development. As such, this area of Green Belt is generally at risk of fragmentation from intensification of existing development. However, the parcel of allocated land (of which about 3ha is designated Green Belt) adjoins the built-up area of Englefield Green/Egham and is itself partly developed, making only a limited contribution to openness.
146. Further encroachment into the Green Belt would be contained by Wick Road and Blays Lane on the site's southern and western boundaries respectively. Also, the wooded area to the south of Wick Road would contain the urbanising effect of the development, and the parcel does not make a significant contribution to the overall integrity of the wider Green Belt. Release of the site would not materially undermine the purposes served by the Green Belt in this area.
147. For the above reasons, and taking account of the overall justification for amending the Green Belt boundary to meet as much of the housing need as possible (see paragraph 55 above), the very limited opportunities to meet the need on unconstrained land within the borough, and the inability of other local authorities to assist with accommodating the unmet need, I am satisfied that exceptional circumstances have been demonstrated to release this site from the Green Belt. Provided that Policy SL5 is modified by **MM25**, which clarifies how the requirement for open space and recreational provision on-site and off-site will be addressed, the policy is justified, effective and sound overall.

#### *Policy SL6*

148. Policy SL6 allocates land at Pyrcroft Road, Chertsey for a minimum of 275 dwellings, 5 pitches for Gypsies and Travellers, and the retention of the Grange Retirement Home in its existing use. Part of the land was identified as a reserve site for long-term needs in the extant local plan. The site's accessibility to a range of local services and to service centres is generally good.
149. The western portion of the allocated site lies within an area of Green Belt that generally restricts the expansion of Chertsey. However, this parcel makes a limited contribution to this Green Belt purpose, due to its topography and other features, and its development would not lead to a reduction in the gap between settlements or harm the overall integrity of the wider Green Belt. The northern and southern boundaries are strong and durable, and the eastern boundary of the parcel will be formed by the proposed residential development on the remainder of the site which adjoins the Chertsey urban area. The proposed south-western boundary along the ditch is well-defined for part of its length, and the remainder can be made defensible by suitable landscaping treatment.
150. The western parcel, as proposed for release for development, does not make a significant contribution to the overall integrity of the wider Green Belt. Its loss would not materially undermine the purposes served by the Green Belt in this area. However, any extension of the allocation further to the west would have an unacceptable visual impact on the rural character of this part of the Green Belt. For these reasons and taking account of the borough-wide factors

summarised in paragraph 147 above, I am satisfied that exceptional circumstances have been demonstrated to release the allocated parcel of land from the Green Belt.

151. However, some modifications are necessary to make Policy SL6 sound. The inset map in the Plan requires a correction to clarify the area of land that is available for the residential development in the north-western corner of the site; the timing of expected delivery needs to be updated; an appropriate landscaping strategy should be implemented as part of the development; proportionate financial contributions towards mitigation of the traffic impact on the A320 will be necessary, and clarity is required about the quantity and type of development expected on the individual parcels of land within the allocation, should they come forward separately. Subject to **MM26** which makes these modifications, the policy is justified, effective and sound overall.

#### *Policy SL7*

152. Policy SL7 allocates land at Thorpe Lea Road North, Egham, for a minimum of 90 dwellings and 2 pitches for Gypsies and Travellers. The site is located close to a range of local services and facilities and has reasonable accessibility by sustainable modes of transport to service centres. It lies within the Green Belt but is mainly developed with offices and car parking and, being mostly enclosed by the built-up areas of Egham and Englefield Green, it does not serve to maintain separation between settlements or make any significant contribution to openness. The site has permanent, durable boundaries that will define the limit of the built-up area and contain urban sprawl.

153. Overall, the site does not make a significant contribution to the integrity of the wider Green Belt and its release would not materially undermine the purposes served by the Green Belt in this area. For the above reasons and taking account of the borough-wide factors summarised in paragraph 147, I am satisfied that exceptional circumstances have been demonstrated to release this parcel of land from the Green Belt.

154. The policy should specify that a transport assessment and travel plan will explore the opportunities to link the development with passenger transport infrastructure and services; also, clarity is required about how the need for open space and recreational provision on-site and off-site will be addressed. **MM27** makes these changes for a justified, effective policy and on this basis it is sound.

#### *Policy SL8*

155. Policy SL8 makes provision for development of land at Thorpe Lea Road West, Egham, for a minimum of 250 dwellings and 3 pitches for Gypsies and Travellers. Similar to the Policy SL7 site, its accessibility to a range of services and facilities by sustainable modes of transport is generally good. It lies within an area of Green Belt that plays a very limited role in separating Egham from Thorpe and it is partly developed, thus making only a small contribution to openness.

156. The proposed allocation is enclosed by strong, durable boundaries formed by the M25, New Wickham Lane, Thorpe Lea Road and Clockhouse Lane East. Its release would not materially undermine the purposes served by the Green Belt

in this area nor would it harm its overall integrity. For these reasons, taking account of the borough-wide factors summarised in paragraph 147, I am satisfied that exceptional circumstances have been demonstrated to release this parcel of land from the Green Belt.

157. The Plan's inset map for the allocation requires updating, taking account of emerging proposals for its development. Also, for an effective policy, it needs to be made clear that opportunities to link the development with passenger transport infrastructure and services will be explored through a transport assessment and travel plan; and the way in which the need for open space and recreational provision will be addressed on-site and off-site should be explained.
158. Furthermore, the policy needs to be explicit about the quantity and type of development expected on the separate land holdings within the allocation, if they should come forward separately. Criterion d) of the policy should be amended for consistency with the objectives of Policy SD4. And the development capacity figure in the footnote to the policy should be corrected, for consistency with the assessed figure.
159. Subject to these main modifications as set out in **MM28**, the policy is justified, effective and sound including in its approach to any development within the Air Quality Management Area that extends over part of the site. The provision of Gypsy and Traveller pitches on the site will be subject to a management framework in accordance with Policy SL22, as modified in accordance with my recommendations, and no modification to Policy SL8 is necessary in this regard.

#### *Policy SL9*

160. Policy SL9 allocates land at Virginia Water North for a minimum of 120 dwellings, including a requirement that the locally listed Merlewood Care Home and its setting is maintained in its current use. The site adjoins the Wentworth Estate and has a low-density residential character with well-wooded, large plots. While the topography is varied, the ground levels of the site generally fall away from its northern boundary on Hollow Lane towards the southern, lower-lying parts of the allocation. Woodlands to the north and west of the site and tree cover on the site itself make significant contributions to the landscape character of the area, which is identified in the Surrey Landscape Assessment, as well as to its ecological value.
161. The Plan indicates the potential for site access from Callow Hill, close to its junction with Hollow Lane, and it also indicates potential for access points off Hollow Lane which already serves properties included in the allocation. However, detailed proposals for access have not been agreed as part of the allocation, and concerns have been raised about the potential impact of access arrangements on trees, woodland and heritage assets on or around the site.
162. The Highways Authority does not have an in-principle objection to the allocation. While I have carefully considered the evidence that indicates otherwise, there appears to be flexibility to bring forward an appropriate solution through a detailed scheme for the site that would meet the Highways Authority's requirements. On balance, I consider that there is a reasonable prospect that safe arrangements for vehicular access/egress to and from the

site can be achieved that will not cause significant harm to landscape, heritage and other important interests on and around the site such that the allocation should be ruled out.

163. The shops, services and rail station in Virginia Water lie to the south, off Christchurch Road. The site's accessibility to local facilities and service centres, although assessed as generally good in the SSMA, is limited by the walking distance to bus routes and by their level of service. I have also noted the gradient of Callow Hill that may discourage walking and cycling. However, as part of the proposed development, the policy requires that opportunities be explored to link with, or contribute towards, the off-road cycle route to Virginia Water rail station, and for contributions to be made towards improvement and maximisation of the links to the existing public rights of way network in the vicinity. On balance, I am satisfied that the site can provide reasonable accessibility by sustainable modes of transport to local services, facilities and service centres.
164. This land is within an area of the Green Belt that performs weakly in preventing the sprawl of Englefield Green and Egham and retaining the gap between them and Virginia Water. And while the allocation site is mainly undeveloped, it is wrapped around by low-density development on two sides and dense woodland and Callow Hill on the other sides which provide strong, defensible features to protect the countryside from further encroachment.
165. Also, set against the background of the Dell, the elevated land on Callow Hill and the existing buildings on the site, it is likely that the visual impact of the proposed development on the countryside will be limited and contained. Overall, I have concluded that the release of the land from the Green Belt will not materially prejudice its overall integrity and is unlikely to lead to a merging of Virginia Water with nearby settlements.
166. Given the site's characteristics, it is suitable only for low-density development and will play a limited role in helping to meet the housing needs of the borough, but having balanced these and all the other concerns expressed about the allocation, I find them insufficient to outweigh the considerations in favour of its release from the Green Belt. And compared with the alternative sites in and around Virginia Water that have been put forward for development, the release of the Policy SL9 site from the Green Belt will not materially undermine its purposes. In this regard, while the alternative sites put forward at Stroude would offer some benefits, I do not consider that these would outweigh the harm of the proposed encroachment into the countryside, including the broad swathe of generally open land that separates this part of Virginia Water from Egham. This would cumulatively weaken the Green Belt's purposes and its overall integrity to a significant extent, and it would not contribute to sustainable patterns of development.
167. For the above reasons and taking account of the borough-wide factors summarised in paragraph 147, I am satisfied that exceptional circumstances have been demonstrated to release this parcel of land from the Green Belt.
168. The policy provides for low-density development (about 6 dwellings per hectare) and other measures that will respect the landscape and biodiversity value of the site and its surroundings and the character of the Wentworth

Estate. Having regard to the built development strategy for this unit (SW1) in the Surrey Landscape Character Assessment, I am satisfied that an acceptably designed scheme in accordance with the policy's requirements for the site will be capable of conserving the essential character of this area.

169. The collaboration agreement that has been made between the owners of Merlewood and Kenwolde covers most of the site and it gives reasonable confidence that it is available and deliverable. There remains some doubt about whether the plot consisting of Gorse Hill Manor and Gorse Hill House (which is expected to yield 6 net dwellings) will become available, but this does not fundamentally undermine the soundness of the allocation.
170. Nonetheless, some modifications of the policy are required. These include re-wording of criterion d), to make clear how the open space requirements will be met. The policy should specify that opportunities for improved pedestrian access to public transport links will need to be explored in the transport assessment, for consistency with the Plan's sustainable transport objectives. Also, it needs to be clear that development on the Gorse Hill Manor and Gorse Hill House parcel may not come forward for development before 2025. Subject to these modifications (**MM29**), the policy is justified, effective, and is sound in all other respects.

#### *Policy SL10*

171. Policy SL10 allocates land off Trumps Green Road to the south of Virginia Water for a minimum of 140 dwellings and two pitches for Gypsies and Travellers. Overall, it offers an acceptable level of accessibility to local services and facilities and service centres by sustainable modes of transport.
172. The site lies within a part of the Green Belt that makes a very limited contribution to its purposes as identified in the Green Belt review. Also, while the site itself has an open, rural character, it is bounded by residential development on 2 sides and partly on the opposite side of Trumps Green Road, and it is visually separated from the wider countryside by dense woodland cover around Beechwood Road. Protection of this land is not necessary to prevent urban sprawl of large built-up areas or the merging of settlements, and its setting will contain the limited encroachment into the countryside that would be made by the proposed development.
173. I have considered the combined impact of this allocation and Longcross Garden Village on the Green Belt in Issue 3 above and am satisfied that they will not significantly harm the overall integrity of the wider Green Belt or materially harm its purposes. In this regard I have also taken account of the potential for a recycling centre on land off Kitsmead Lane, as identified in the emerging Surrey Waste Plan. But in my view, careful design and landscaping of the south-western part of the Policy SL10 site can conserve the rural aspect of this edge of Trumps Green/Virginia Water and minimise any visual coalescence of development across the wider area.
174. Given the considerations above and the factors summarised in paragraph 147, there are exceptional circumstances that justify the release of the land at Virginia Water South from the Green Belt.

175. Details of the policy require modification for effectiveness, by making clear how the need for open space of different types will be met, and how opportunities for improvements to sustainable transport will be pursued through the development, since these need to be embedded into the site allocation policies for an effective plan. Also, an error in the reference to the Surrey Landscape Character Assessment should be clarified for a justified policy. Subject to these changes that are made by **MM30**, the policy is sound. There is insufficient evidence to justify the removal of the policy's requirement for provision for Gypsy and Traveller accommodation on the site.

#### *Policy SL11*

176. Policy SL11 allocates land known as Parcel B, Veterinary Laboratory site, Addlestone, for a minimum of 150 dwellings, and two Gypsy and Traveller pitches. Access is proposed from a track off Woodham Park Road. Links into the public rights of way network through the residential area on the eastern boundary of the site are also proposed. Overall the site scores 'medium' in terms of accessibility, with mixed levels of accessibility to a range of services, facilities and service centres by sustainable modes of transport.

177. The site lies within a wider area of the Green Belt that plays an important role in containing the unrestricted sprawl of Addlestone. However, Parcel B is mainly enclosed by the urban area of Addlestone, with built development along its eastern, northern and part of its western boundary, and its topography and setting serve to limit its visual connection with the wider Green Belt to the south. As a result, it plays only a limited role in maintaining the gap between Addlestone and the built-up areas to the south and south-west. Bearing in mind the potential effects of the proposed site access from Woodham Park Road, enhanced landscaping on the western and southern boundaries of the site will assist in safeguarding the open countryside from encroachment and maintain the visual and physical separation of Row Town from Woodham.

178. For these reasons, the release of the site from the Green Belt would not materially harm its purposes or significantly affect the overall integrity of the wider Green Belt. Taking this into account and the borough-wide factors summarised in paragraph 147, there are exceptional circumstances that justify the release of the site. However, it would not be justified to release additional land on the Veterinary Laboratory holding, since it plays a stronger physical and visual role in maintaining the separation of Row Town from Woodham.

179. The policy needs to be modified to specify that development will be contingent on mitigation of its traffic impact on the A320 and on proportionate financial contributions to the mitigation scheme; and opportunities for improvements to sustainable transport will need to be pursued through the development. Also, specific reference to the landscaping of the southern boundary of the site and the confirmed Tree Preservation Order are required. These changes are set out in **MM31** and are necessary for a justified and effective policy and consistency with the Plan as a whole.

#### *Policy SL12*

180. Policy SL12 allocates land to the south east of Ottershaw for provision of 200 dwellings, two pitches for Gypsies and Travellers and a new health care facility

including a GP surgery. In addition, a 7.5ha parcel adjoining the eastern boundary is allocated for provision of SANG. Accessibility to a range of services, facilities and service centres from the site is generally good.

181. The housing site lies within an area of the Green Belt between Ottershaw, Addlestone and New Haw. But taking account of the size and location of the site, it is not necessary for maintaining the separation of these settlements or protecting the countryside from further encroachment, and it does not serve a role in preventing the spread of a large built-up area. It has clearly defensible boundaries apart from on its eastern edge, but the designation of the SANG to the east of the public footpath (FP30) will prevent urban encroachment onto the rising land beyond the footpath which would contribute to the coalescence of settlements.
182. On this basis, the allocation would not materially harm the purposes of the Green Belt in this area or undermine its strategic role. I am satisfied that for these reasons and given the borough-wide factors summarised in paragraph 147, there are exceptional circumstances which justify the release of the housing land parcel from the Green Belt.
183. The policy requires certain modifications to secure its soundness. It should specify that the development will be subject to the delivery of necessary mitigation of its traffic impact on the A320, and that proportionate financial contributions towards this and towards the provision of school infrastructure will be necessary. Also, the timing of the development should be updated for closer alignment with the timescale for the A320 mitigation works. Clarity is also necessary that opportunities to link to the A320 cycle network will be explored through the development. Furthermore, it needs to make clear that in addition to the provision of 0.1ha on the site for a health facility, a proportionate financial contribution towards its development will be sought.
184. It is also necessary to specify that only the 6.6ha site is allocated for the housing, Gypsy and Traveller pitches and health facility development and that a minimum of 200 dwellings is required, and that SANG is to be provided in the area notated in purple on the inset map included in the Plan (and as shown on the submission policies map). The incorrect reference to a Tree Preservation Order on the site should also be removed. And criterion d) of the policy should require that development takes account of the nearby ancient woodland and its buffer zone which extends into the proposed SANG, and I have therefore amended the main modification that was subject to public consultation.
185. Taken together, the above modifications are required to make the policy justified, effective and consistent with national planning policy for proportionate contributions towards the provision of infrastructure that is made necessary by new development. **MM32** addresses these matters.

### *Policy SL13*

186. Policy SL13 allocates two parcels of land within the complex of St Peter's Hospital, Chertsey for the development of a minimum of 400 dwellings. The lands have the benefit of a recent planning permission and detailed proposals for its development are being brought forward. Although accessibility to some local services is mixed, the site's overall level of accessibility is good.

187. St Peter's Hospital is designated in the extant local plan as a Major Developed Site in the Green Belt and the Plan proposes to release it in its entirety. I have taken account of the evidence on the extent of development on the complex, its strong boundary features, the role played by the land in maintaining the separation of settlements, and its relationship with adjoining land and the built-up area of Chertsey.
188. In this light I am satisfied that release of the site would not materially undermine the role of the Green Belt in separating Chertsey from Lyne, and Chertsey from Virginia Water. And its release would not weaken the Green Belt's roles in checking urban sprawl and safeguarding the countryside from encroachment. For these reasons and given the borough-wide factors summarised in paragraph 147, and also bearing in mind that development of the allocation will help fund necessary improvements and expansion of the hospital itself, there are exceptional circumstances that justify the release of the site from the Green Belt.
189. The policy should make clear that the traffic impact of the new housing on the A320 must be addressed in bringing forward the development and that proportionate financial contributions will be required to this end. Also, opportunities to provide a cycle link between the A320 and Holloway Hill/Stonehill Road should be explored through the development. These modifications are necessary for an effective policy and for consistency with NPPF and the Plan's objective to promote and secure active and sustainable transport.
190. Also, updated information on the expected timescale for delivery of the development and about the Tree Preservation Order on the site, and clarity about the way the development is expected to meet needs for open space should be included for a justified and effective policy. On balance, the proposed main modification to delete the reference to the entirety of the site being released from the Green Belt is not justified, since it provides important contextual information about the remainder of the hospital complex, and I have amended the MM schedule accordingly. Subject to **MM33** which incorporates the above changes to the policy, it is sound.

#### *Policies SL14-SL18*

191. Policies SL14-SL18 allocate 5 sites (Chertsey Bittams Parcels A-E) for residential development, Gypsy and Traveller pitches and other uses on lands off Green Lane and Bittams Lane. Even though Parcels D and E have poorer accessibility to primary schools than the other sites, the overall accessibility of these parcels to a range of services and facilities and service centres is generally good.
192. The sites lie within the same general area of the Green Belt that surrounds the built-up area of Chertsey and is tightly defined by the strong, defensible boundaries formed by the A320 Guildford Road, A320 St Peter's Way and the M25. As such, its retention in its entirety within the Green Belt is not necessary to prevent further urban sprawl. And taking its location, setting and semi-urban character into account, development in this area is unlikely to lead to the merger of settlements.

193. I agree with the detailed assessment of the individual parcels which found that, while in some cases the gap between Chertsey and Addlestone is physically narrow, the parcels of land play limited roles in protecting the purposes of the Green Belt, and that their loss, individually and cumulatively, will not harm its overall integrity. Taking account of the borough-wide factors summarised in paragraph 147 and these site-specific considerations, I am satisfied that there are exceptional circumstances which justify the release of the sites from the Green Belt.
194. In comparison, alternative sites that were considered for development between Chertsey and Ottershaw and to the west of Guildford Road, Ottershaw, were in my view correctly rejected due their importance in protecting the countryside from encroachment and/or preventing coalescence of Chertsey and Ottershaw. While their development could offer a range of benefits, and their scores on other selection criteria were generally acceptable, these considerations do not outweigh the significant harm that would be caused to the Green Belt's overall integrity and its purposes. Similarly, even though lands between the A317 St Peter's Way and the built-up area of Addlestone generally offer good accessibility to services and facilities, they play a very important role in maintaining openness and the separation of the settlements and their release from the Green Belt would be likely to lead to the coalescence of Chertsey and Addlestone. As such, release of the alternative sites would not contribute to sustainable patterns of development.
195. Turning to the individual site allocation proposals in Chertsey Bittams, Policy SL14 allocates Parcel A for a minimum of 175 dwellings, land for a community hub facility and five pitches for Gypsies and Travellers. Given the current level of need for pitches in the borough, the potential to provide a separate access to the pitches on this site and its potential land value compared with other locations in the borough, this requirement is justified. Flood risk matters can be adequately considered at the detailed planning stage, in accordance with the policy's requirement. Furthermore, the protection of human health, having regard to the Air Quality Management Area that extends over part of the site, and the potential impact of traffic noise, are taken into account in the allocation policy.
196. It may be possible to mitigate the traffic impact of the development on the A320 as part of a detailed scheme for the site, but this does not remove the need for mitigation and a contribution towards its provision to be set out in the policy. The timing of delivery of the site needs to be modified to 2023-2026, to reflect the most up-to-date information on the A320 scheme, but this does not prevent earlier delivery if it can be demonstrated that it would not be harmful.
197. The policy requirement to avoid severance and re-routing of the public right of way on the site needs modification to allow for a change to the right of way if it would result in a better route. Finally, clarity is needed about the type of open space provision to be made on the site, where possible. **MM34** makes these modifications and on this basis, the policy is justified, effective, consistent with national planning policy and with the Plan as a whole.
198. Policy SL15 allocates land on Parcel B for a minimum of 120 dwellings and two pitches for Gypsies and Travellers. Provided that the policy is modified to reflect the updated timescale for delivery, the need to contribute to A320

mitigation measures, as well as clarify the type of open space provision to be made on the site and how any proposal for re-routing or severance of the public right of way will be considered, the policy will be sound. **MM35** makes these changes.

199. Policy SL16 allocates land on Parcel C for the development of a minimum of 35 dwellings and one pitch for Gypsies and Travellers. Since the Plan's submission, the landowner has proposed a change to the development mix, with 11 pitches and a minimum of nine dwellings.
200. The proposed increase in the number of pitches will help to meet the identified need in the borough while not materially reducing the supply of Class C3 dwellings, and it gives greater confidence that the need for pitches can be met over the Plan period. It also enables some of the need for Travelling Showpeople plots in the borough to be met, through the replacement of the proposed pitches at LGV by plots for Travelling Showpeople. While it increases the proportionate contribution that this part of the borough will make towards the overall need for pitches, there is insufficient evidence that this may cause material harm to residential amenities, highway safety or other important interests. Overall, the proposed change in the development mix is justified and consistent with national policy. Any unauthorised development on the site at present is a matter for the Council to consider.
201. For soundness, Policy SL16 should reflect the above change to the development mix and ensure that the existing temporary pitch on the site is retained to meet the established need. Also, it is necessary to reflect the updated timescale for delivery of the development, the need to contribute towards A320 mitigation measures, and to clarify the type of open space provision to be made on the site. **MM36** makes these changes for a justified, effective policy and consistency with national policy and the Plan as a whole.
202. Policy SL17 allocates land on Parcel D for a minimum of 125 dwellings and incorporating the retention of the existing 93-bed care home on the site. As with other allocations in Chertsey Bittams, modification of the policy is necessary to reflect the updated timescale for delivery of the development, the need to contribute towards A320 mitigation measures, and to clarify the type of open space provision to be made on the site. **MM37** makes these changes and on this basis, the policy is justified, effective and consistent with national planning policy and the Plan as a whole.
203. Policy SL18 allocates land on Parcel E for provision of a minimum of 75 dwellings and including retention of the Grade II listed building on the site. Some changes to the policy are necessary for soundness, including correction of the details of the listed building, and to update the timescale for delivery, confirm the requirement for a financial contribution towards mitigating the traffic impact on the A320, and to clarify the type of open space provision on the site. **MM38** makes these changes and, subject to these, the policy is justified, effective and consistent with NPPF and the Plan as a whole.

#### *Thorpe Village*

204. I have concluded in Issue 2 above that there are exceptional circumstances in principle for altering the Green Belt boundary in the Plan. In bringing forward the Plan, the Council carried out a review of the Green Belt villages, including

Thorpe, taking account of the advice in paragraph 86 of NPPF. Particular attention was paid to the character of the edges of the village envelope and their relationship with the wider Green Belt.

205. On the balance of the evidence about the limited contribution that the village makes to the physical and visual openness of the Green Belt, it is justified and consistent with national planning policy to exclude Thorpe Village from the Green Belt. The Plan's definition of the new Green Belt boundary around village, as shown on the policies map, has been informed by Stage 2 of the Green Belt Villages Review and I am satisfied that it is justified, positively prepared, effective and consistent with NPPF, including that exceptional circumstances exist for the alteration of the Green Belt boundary.

206. The Thorpe Neighbourhood Plan is in preparation and it will be informed by the strategic policies of the local plan, including Policy SD2 which proposes limited growth in Thorpe in accordance with the spatial strategy. This level of growth is capable of being accommodated within the proposed settlement boundary. Nonetheless, should a need be identified through the Neighbourhood Plan, detailed amendments to the boundary could be made in accordance with paragraph 136 of NPPF 2019. For clarity, paragraph 5.30 of the Plan should be modified to acknowledge this (**MM10**). Therefore, reasonable flexibility exists to take account of any new evidence that may become available during the Plan period. Subject to the above, the proposals for Thorpe Village are sound.

### *Conclusion*

207. In conclusion on this issue, provided that the recommended MMs are made, I am satisfied that the other proposed allocations for housing are sound, and that there are exceptional circumstances that justify the exclusion of Thorpe Village from the Green Belt.

## **Issue 5 – Are the Plan's provisions for employment and town centre development sound?**

### *Employment Policies and Employment Land Supply*

208. I have concluded in Issue 1 above that the objectively assessed need for employment land in the borough is in the range of 66,000-84,000sqm of Class B1a/B1b space, and 21,000-29,000sqm for Class B1c/B2/B8 uses (2015-2030). Policy SD2 sets out how provision will be made throughout the borough to accommodate this need, including a new business park at New Haw (Policy IE1) and in the Longcross Enterprise Zone (Policy SD10), and through the implementation of commitments in other existing employment areas.

209. The adequacy of the overall supply has been robustly assessed, consistent with NPPF and the Planning Practice Guidance. The substantive body of evidence in the Employment Land Review has been updated and supplemented to take account of losses and completions, schemes under construction, commitments, vacancy rates and market trends.

210. The existing industrial floorspace at Longcross Park is almost entirely used by film industry businesses as and when required, and on a temporary basis only (see Issue 3 above). Overall, this amounts to a very low density of employment on the site. While there is evidence of demand for increased

provision of facilities for high-end film and TV production facilities in the broadly-defined London area, the studios at Longcross are ranked in the lowest category and there is also no substantive evidence that they need to be replaced elsewhere in Runnymede when they are required for the development of LGV. Therefore, on the balance of the evidence, it was reasonable for the Council not to include the loss of this floorspace in assessing the need for employment land.

211. The updated land supply position at the examination shows potential for a small shortfall in Class B1c/B2/B8 supply (about 6,000-14,000sqm, measured against the labour demand and labour supply scenarios respectively), taking the proposed allocation at Byfleet Road, New Haw (Policy IE1) into account.
212. However, the need figures include a margin to allow for flexibility in the supply. Also, the potential shortfall in industrial supply is more than compensated for by the identified surplus in office supply. The Plan's policies allow flexibility to cater for the changing needs of the economy and, for example, a range of employment uses can be accommodated within the identified Strategic Employment Areas (SEA) through redevelopment of outdated office floorspace and vacant sites, as well as on suitable sites elsewhere in the borough.
213. It is reasonable to expect the SEAs to continue to play a strong role in meeting employment needs through intensification, churn and their attractiveness to clustering of new business. Policy IE2 seeks to protect and strengthen their function as the core supply of employment land in the borough. It is also worthy of note that the Council is taking forward a proposed Article 4 Direction to control the change of use of employment land to residential in each of the SEAs.
214. While there may be some challenges in harnessing the full potential of available sites within the SEAs, market interest and proposals for redevelopment of vacant office premises for industrial use in the Causeway points to the opportunities for recycling employment land. Also, vacancy data for Class B employment space within the SEAs alone, compared with the total Class B floorspace of the sites identified in the Employment Land Review, indicates a vacancy rate of 9.2%; this gives confidence that, across the borough, there is likely to be an appropriate level of vacancies for 'churn' and flexibility in the employment land supply to respond to market demand.
215. Overall, having regard to my findings on Policy IE1 below, I am satisfied that the Plan's provision for employment gives reasonable flexibility to accommodate the needs that are likely to arise in the Plan period, including in the B1c/B2/B8 classes. On the balance of all the evidence, Runnymede's employment land market appears to be operating well in supporting business needs, including inward investment, while helping to make optimum use of the existing employment land in a heavily constrained area. This is a balanced, sustainable approach and it is supported by close working with the Local Enterprise Partnership and neighbouring planning authorities to respond to business needs. It is too early to assess whether economic consequences of the coronavirus pandemic may justify provision of more employment land in the borough, including for storage and distribution.

216. Policy IE1 allocates land at Byfleet Road, New Haw for B1c/B8 floorspace in order to ensure a range and choice of employment floorspace over the Plan period. It states that an element of B2 floorspace may also be acceptable where it would not have a negative impact on the residential amenities of neighbouring property. Part of the site lies within Flood Zone 3 but more than 75% lies within Flood Zones 1 or 2. The Council has applied the Sequential Test for minimising flood risk in considering whether this site should be allocated for employment development. Also, its selection has been informed by the same rigorous process as the housing site allocations, and I am satisfied that it is the most appropriate of the reasonable alternatives. In this regard it is noteworthy that it offers generally good accessibility by bus and rail, as well as by cycling.
217. During the examination, further work has been carried out by the Council, the Environment Agency and the site's promoter to assess the flood risk matters in more detail, following the withdrawal of a planning application for the development in Spring 2019. The Environment Agency has confirmed that it has no objection in principle to the development of the site for employment, and it is understood that flood compensation measures have been agreed. A revised planning application is expected by the Council.
218. Some modifications of the policy are required for soundness. The extent of the site has been slightly reduced and its boundaries altered and thus the policy and the inset map in the Plan need updating. It will be necessary for the Council to amend the policies map accordingly. In addition, the biodiversity value of the site and surroundings needs to be more fully described in the policy.
219. The requirement for a minimum of 20,000sqm net additional floorspace is too prescriptive, given the flood risk constraint. For this reason, the proposed main modification sets out that the site will provide "in the region of 20,000sqm net additional floorspace". The Environment Agency's response to the consultation on the MM expresses concern that in the region of 20,000sqm may not be achievable while not increasing flood risk on the site or elsewhere.
220. However, on balance, I consider that the modified policy provides reasonable flexibility for a detailed scheme of development to come forward that can ensure that flood risk is controlled on the site and is not increased in the surroundings, while optimising the use of the parts of the site that can be developed. This will need to be informed by a site-specific flood risk assessment accompanying a new planning application. Should it become clear that the site is unlikely to make the contribution to the employment land supply that is necessary, this will be a matter for review of the Plan.
221. Subject to the above modifications (**MM55** and the relevant part of **MM13**), I am satisfied that the allocation provides for a high-quality development on a suitable, available site and it is sound.
222. In the light of my findings above on the overall need and supply, including through Policies IE1 and Policy SD10 and the timing of the latter's delivery, there is currently no need to allocate additional employment sites in the borough, over and above the provision made in the Plan for the period up to 2030. Also, reasonable alternatives to the Plan's employment land provision

have been tested through the site selection process. I have considered the concerns raised about the suitability of the methodology, the accuracy of the scoring matrices and the planning judgements that led to the rejection of the alternatives, but as concluded above, the overall process was robust and fit for purpose. Even if any of the alternative sites should have been ranked more highly, in the light of all the information before me about their merits I have found no convincing evidence that they would perform better than the allocated sites. Regarding the land adjoining the northern boundary of Thorpe Industrial Estate, while its proximity to the SEA offers some advantages, its rejection was justified on balance because of its inferior level of accessibility coupled with the level of constraints, which there were insufficient reasons to conclude could be mitigated satisfactorily.

223. Policy IE3 sets out how modern business needs will be catered for, including supporting proposals for redevelopment of outmoded floorspace and a range of other measures to encourage the retention, creation and development of local businesses. For justification and effectiveness, **MM56** clarifies that one of the policy's objectives is to provide well-designed business premises and, subject to this, the policy is sound.
224. The visitor economy plays important roles in Runnymede and Policy IE4 provides criteria for fostering and protecting it through new development. Subject to **MM57**, which corrects an error in the wording of the policy, it is sound.
225. Overall, with the modifications recommended above, the Plan's employment policies are sufficiently flexible to help meet the priorities of the economic development strategy set out in paragraph 8.6 of the Plan, and are justified, positively prepared, effective and consistent with national planning policy.

#### *Town Centre Roles, Needs and Development Opportunities*

226. Taking the Plan as a whole, it contains a comprehensive policy framework to address the roles, needs and opportunities in all the borough's centres in a way that will respect their distinctive characteristics, informed by robust evidence. Existing tools such as the borough's conservation area appraisals, together with the proposed supplementary planning document on design will inform decision making, and more detailed policies for the town centres are not necessary for soundness of the Plan.
227. In this regard I have taken account of residents' concerns about changes in the character of the towns, design quality of new developments, the impact of studentification and other issues. However, to the extent that the Plan regulates these matters, I am satisfied that its overall framework and policies meet the tests of soundness.
228. It is reasonable to expect that the Council will apply the requirements for sequential testing and impact assessment of retail and leisure proposals in a proportionate way that has regard to the context of a proposal; therefore, no modification is required to Policy IE5 in this regard.
229. However, Policy IE6 (Town Centre development) should be modified to remove the superfluous reference to exceptional circumstances in the context of a proposed change to residential use on ground floors within Secondary

Shopping Frontages. **MM58** deletes this requirement to ensure that the policy is clear and effective. It also clarifies that Table 3 refers to floorspace in square metres (net).

230. Policies IE7-IE10 allocate sites in Addlestone and Egham for mixed use development, including requirements to deal with drainage constraints and take account of heritage assets in the vicinity of the Egham sites. These allocations were identified through the Strategic Land Availability Assessment and subject to sustainability appraisal, and they have been informed by the masterplan for Egham, where relevant, and by the Town and Local Centre Study. As redevelopment proposals, they will provide for the regeneration of the centres, play an appropriate role in accommodating retail, leisure, residential and other town centre needs over the Plan period, and provide reasonable flexibility for the mix of uses having regard to local needs.
231. Policy IE10 supports student accommodation as part of the residential development of the site, but it should be clear that if student accommodation is not proposed, the higher figure of a minimum of 120 residential units will be sought. **MM59** makes this change for a justified and effective policy and subject to this, Policies IE7-IE10 are sound.
232. As submitted, the Plan identifies Strodes College Lane in Egham as an Opportunity Area for mixed use development. In the light of the planning permission granted in February 2019 and for effectiveness, the Opportunity Area policy needs to be replaced by a site allocation policy. This is achieved by **MM60** which is consistent with the planning permission, allows flexibility for development of other uses, and identifies the need for protection of heritage assets on and around the site. On this basis the new site allocation policy will be sound. The Plan's policies, the Key Diagram, the inset maps for the Opportunity Areas and cross-references need to be updated and renumbered accordingly (**MM8, MM15, MM19**) and the Policies Map also updated.
233. Policy IE11 identifies other Opportunity Areas within Chertsey and Egham town centres that have potential for development during the Plan period. While I am satisfied that they are justified, positively prepared and consistent with national planning policy, an error in the text about the potential impact on the Principal Aquifer needs to be corrected in the case of the Sainsbury's and car park Opportunity Area. **MM61** makes this correction and on this basis, Policy IE11 is sound.
234. Overall, provided that the above modifications are made, the Plan's policies set a clear, positive framework to guide future development in the town centres that will meet the borough's needs over the Plan period.

### *Conclusion*

235. Subject to modification of the Plan in accordance with the recommendations above, its policies for employment and town centre development are sound.

## **Issue 6: Are the Plan's policies for specific elements of new housing provision sound?**

### *Housing Mix and Size*

236. Policy SL19 seeks to ensure that new development of 10 or more net additional dwellings delivers a mix of housing types and dwelling sizes that will meet the needs of the borough. The policy is informed by the SHMA 2018 and the Housing Space Standards document. The proposed mix is supported by the evidence and is justified.

237. The evidence on dwelling size is limited due to the scale of the research undertaken by the Council but it is reasonable and proportionate in my view. In the sample of completed housing schemes that were examined in more detail, only 17% of the dwellings met or exceeded the Nationally Described Space Standard for 1, 2 and 3-bedroom units, and in the case of 1-bedroom flats with 2 bed spaces, none of them met the standard.

238. The benefit of ensuring that new homes provide for at least the nationally described space standard is clear, since it provides reasonably for the needs of occupiers, including an element of adaptability, and it may help to encourage downsizing. The viability evidence indicates that no overall adverse impact is likely to occur as a result of setting the minimum space standards in the policy. On balance of all the evidence, I am satisfied that the policy is sound.

### *Affordable Housing*

239. Based on the SHMA 2018, the annual level of need for affordable housing in the borough is 471 dwellings. However, given that most of the affordable housing that will be delivered over the Plan period will come forward as part of market-led housing schemes, and that this is subject to viability, and bearing in mind that the housing requirement already includes an uplift to improve affordability, it would not be realistic for the Plan to aim to meet the whole of the affordable need.

240. In these circumstances, Policy SL20, which requires the provision of affordable housing in the borough, is supported by robust evidence of need and whole plan viability testing. Overall, it seeks to deliver 30% of all net additional dwellings over the Plan period as affordable housing, and sites above the site-size threshold will be expected to provide 35% of the dwellings as affordable housing. The policy provides reasonable flexibility to take account of site-specific factors at the planning application stage.

241. Whole Plan viability evidence that includes assumptions for site infrastructure and other policy costs indicates that, in principle, 50% of the dwellings on qualifying sites could be provided as affordable housing. However, it does not take account of all the costs of key infrastructure projects that are identified in the delivery plan, and the potential funding gap is about £60M. The Plan sets a 35% requirement for affordable housing to enable the Council to seek an appropriate balance between meeting needs for both affordable housing and key infrastructure, through negotiations on a site by site basis, in order to close the funding gap so far as it is viable to do so. This is justified.

242. In order to help secure the Plan's relevance for decision making in accordance with NPPF 2019, amendments to the policy and supporting text are justified to align more closely with the revised definition of affordable housing. This entails reducing the site-size threshold from 11 to 10 units, amending the proportion of affordable housing that will be sought as Affordable/Social Rent and other forms of affordable housing to a 70:30 split respectively, and making clear that this should include 10% of homes for affordable home ownership. There is nothing to indicate that these amendments are inconsistent with the evidence supporting the policy. **MM39** makes these changes to the policy and supporting text and on this basis the Plan is sound. **MM62** makes the consequential changes to the monitoring framework.

#### *Gypsies, Travellers and Travelling Showpeople*

243. Policy SL22 sets out how the Council intends to provide for the level of need identified in the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2018 (the accommodation assessment). This is robust and up-to-date evidence that has informed the Council's actions and the Plan's provisions for the needs of these groups. Further evidence has been provided during the examination about the Council's progress with site management issues that are being actively pursued and are expected to bring authorised sites at Walnut Tree Farm and Little Almnors Caravan Park back into authorised use by Gypsies and Travellers.

244. As a result, modification of the policy and supporting text is necessary to amend the requirement for new pitches and plots, and to clarify the way in which they will be delivered and managed. The site allocations considered in Issues 3 and 4 above make specific provision to meet these needs.

245. As modified, the Plan provides for the full, identified accommodation needs of nomadic Gypsy and Traveller households up to 2030 to be met (83 pitches), and the site allocation policies set out the timescales for meeting the need. Given that completion of some sites depends on delivery of the A320 mitigation works, this means that there will be some delay in providing pitches (and plots) compared with the five-year requirement. However, this is a justified and proportionate approach and in accordance with the spatial strategy which is sound.

246. Modifications are also necessary to clarify the criteria for the determination of planning applications, ensure that pitches and plots are retained for their intended purpose, and confirm that some of the pitches and/or plots may be delivered as affordable housing, further to Policy SL20. In addition, modifications are required to confirm that existing provision in the borough, which includes an adequate stock of residential caravan parks, together with other policies of the Plan, will enable the needs of households that fall outside the planning definition of travellers (as set out in the Government's *Planning Policy for Traveller Sites, August 2015*) to be addressed.

247. The accommodation assessment also identified 32 households where it has not been possible to ascertain if they meet the planning definition. While it is unlikely that all these households fall within the planning definition, they may have needs that require to be addressed over the Plan period. This is a matter

for the Council to keep under review in accordance with Policy SL22 and the other policies of the Plan.

248. As modified in accordance with my recommendations on Policy SD10, the Plan provides for at least 10 plots for Travelling Showpeople, compared with the identified need for 19 plots. Nonetheless, I am satisfied that all reasonable alternatives have been explored in seeking to identify sites that would fully meet the need. The policy framework, as modified, commits the Council to continue tackling site management issues that displace qualifying users from occupying authorised sites. It also makes clear that proposals for modest expansion of authorised sites or redevelopment of existing sites to provide plots will be favourably considered within the overall policy framework. Balancing all the considerations, this is a justified and proportionate response, given the Green Belt and other constraints that affect the borough.
249. The accommodation assessment does not identify a need for transit pitches in Runnymede and accordingly, no such provision is made in the Plan. However, for clarity and positive planning, it should be confirmed that the Council is working in partnership with other Surrey Districts and the County Council to keep this issue under review, and how any proposed provision will be considered if necessary.
250. Taking the above into account, **MM40** makes the necessary changes to Policy SL22 and the supporting text to ensure that the Plan is justified, positively prepared, effective and consistent with national planning policy, and therefore sound. **MM62** makes a consequential change to the monitoring framework.

#### *Other Special Housing Needs*

251. The Plan contains policies that address how the accommodation needs of older people and others with special needs will be met. Policy SL23 sets out a positive framework that recognises the need for these types of housing, having regard to the expected increase in the number of households with special needs as identified in the SHMA 2018 and to the advice in the Planning Practice Guidance.
252. Taking account of recent completions, development under construction, extant planning permissions and the proposed allocation for an extra care facility at Longcross Garden Village, there is identified provision for an additional 468 units of specialist housing for older people. During the examination various estimates of need have been put forward, based on the SHMA 2018, more recently derived estimates from the 2016-based sub-national projections and informed by the Housing LIN toolkit and other modelling work.
253. The identified provision is in the mid-range of the estimates and it would exceed the need figure based on the more recent population projections and applying the Housing LIN toolkit, which may over-estimate the need in more affluent areas such as Runnymede. On balance, there is a reasonable prospect that most if not all the need will be met over the Plan period, given that there may also be potential at the former Longcross Barracks, as well as on unidentified sites.
254. The evidence indicates that most of the need will be for extra care housing, and the development pipeline reflects this and is likely to provide for a range

of tenures. While there is demand for leasehold property, including retirement villages with a distinctive format, I have found insufficient evidence that exceptional circumstances exist to release additional land from the Green Belt for this purpose.

255. Overall, the Plan's approach to the provision of specialist housing for older people is justified. However, for clarity and therefore effectiveness, the text should also include reference to provision of appropriate options for all sections of the population, provide detail about the level of need for different types of care that is expected to arise by 2030, acknowledge that this may be subject to change and that applications for new development will be considered against the needs identified in the Council's most up to date SHMA (**MM41**).
256. Sustainable design of new development in general will also play an important role in meeting the various needs of the population. Policy SD8 lays down a comprehensive framework for sustainable design, including a requirement for major residential schemes to achieve compliance with Part 4(M2) of the Building Regulations and for 5% of the dwellings to achieve Part 4(M3), subject to viability. This will make a significant contribution to meeting the need for wheelchair adaptable or accessible dwellings that is identified in the SHMA 2018 for the Plan period and, as tested in the whole Plan viability assessment, it is deliverable. In this and all other respects, Policy SD8 is sound.
257. Policy SL23 also considers the need for student housing, which is particularly important in Runnymede given the presence of Royal Holloway, University of London in Egham. The accommodation needs of the projected growth of the student population in the borough have been robustly assessed as part of the SHMA 2018 and there is a reasonable prospect that the identified supply, together with proposals in the pipeline, will meet the need. Some of the town centre allocations are identified as having potential for student accommodation. Given the evidence, including close working with the university, an additional allocation of land in the Green Belt for student accommodation would not be justified. The policy lays down suitable criteria that will guide the determination of planning applications, including measures that will assist in protecting the amenities of nearby residents. Overall, the Plan's provision for student accommodation is sound.

#### *Self-Build and Custom-Build Housing*

258. As submitted, Policy SL24 requires that 5% of the total number of dwellings on residential schemes of 20 dwellings or more are to be made available for self/custom-build housing in new developments. However, in the light of the change in eligibility requirements to be placed on the register for self/custom-build plots, the detailed provisions in the Plan's policy are no longer justified by the evidence. **MM42** amends the policy and supporting text to raise the threshold size of the scheme to at least 50 dwellings, provide a more flexible and positive approach that relates to the identified level of local need, as well as encouraging such proposals generally. **MM62** makes a consequential change to the monitoring framework. On this basis the policy is justified and consistent with national planning policy.

## *Conclusion*

259. Provided that the Plan is modified in accordance with the recommendations above, its policies for the specific elements of new housing provision are sound.

### **Issue 7: Are the policies for enhancing the borough's environment and protecting its open spaces sound?**

260. The Plan contains policies that seek a high-quality built environment and good design, whether in the borough's urban areas or in the Green Belt, and taken together, they will help to ensure that development mitigates, and adapts to, climate change impacts. It includes a positive policy approach to renewable and low carbon energy. And it also addresses environmental protection, including air quality, noise, land contamination and light, the protection and enhancement of heritage assets, the natural environment and the Green Belt. In most respects these elements of the Plan are sound.

261. The approach to design matters is supported by Runnymede's Urban Character Appraisal and the Surrey Landscape Assessment which will be used in the preparation of a Supplementary Planning Document on design. However, for justification and effectiveness, Policy EE1 on Townscape and Landscape Quality and its supporting text needs to be modified. This will avoid undue prescription, align more closely with NPPF 2019 especially on inclusive design, explain the use of Design Review Panels, and update the reference to the emerging Supplementary Planning Document. **MM44** makes these changes.

262. Policy EE2 concerns environmental protection. In order that the policy is applied in a justified manner, the policy and supporting text needs to be clear that existing businesses and community facilities will not be made subject to unreasonable restrictions as a result of any new development that is subsequently permitted. Also, for effectiveness, it should be clarified that assessments need to accord with best practice guidance or advice. The modifications set out in **MM45** are therefore necessary.

263. Policy EE9 (Biodiversity, Geodiversity and Nature Conservation) needs modification to clarify the approach to the hierarchy of designated sites and how development proposals that affect these will be considered. Also, the supporting text should confirm that any new Sites of Nature Conservation Importance that are identified through a re-survey during the Plan's lifetime will be considered in the same way as existing designations. **MM46** makes these changes for a justified and effective plan. Also, **MM2** clarifies the roles of the Surrey Nature Partnership and Surrey Wildlife Trust in protecting and managing the natural environment in Runnymede and outside the borough, and **MM64** corrects an omission in the list of priority habitats and species in the borough.

264. The way in which development that may adversely affect Thames Basin Heaths Special Protection Area will be considered is set out in Policy EE10 and the supporting text. Given the importance of the Delivery Framework for protection of this area and taking account of the removal of the cap on pooling contributions secured under s106 of the Act, some modifications of this part of the Plan are required. **MM47** clarifies the broad catchment areas for SANGS of different size, confirms how SANG provision will be secured, and clarifies that

developments of fewer than 10 dwellings should not normally be required to be within a specified distance of SANG land. On this basis, the policy gives the requisite attention to the needs of the Special Protection Area, including provision of SANG for the expected growth in the borough's population.

265. Also, for a justified and effective plan, the monitoring indicator of SANG capacity should be kept under continuous review, to inform delivery of the proposed new housing, and this is addressed by **MM62** which includes a requirement that if capacity falls below 200 units, new SANG will need to be identified and put in place. However, it is not necessary for soundness to include detail in the Plan about the catchment areas of the existing SANG, and **MM21** to Policy SD6 makes it clear how development proposals that are reliant on the delivery of critical infrastructure, which includes SANG, will be determined, in the interests of the Special Protection Area. I return to Policy SD6 below in the context of highways infrastructure.
266. Policy EE11 concerns Green Infrastructure and it draws attention to the Biodiversity Opportunity Areas in the borough where development proposals can play a role in restoring, maintaining and enhancing habitat connectivity. For an effective plan, **MM48** provides information in the supporting text about possible off-site projects that may be supported in accordance with this policy.
267. Policy EE13 is concerned with the management of flood risk. As part of the River Thames Scheme, the Plan seeks to safeguard land for the proposed route of the flood channel through the borough, as shown on the Policies Map. Detailed proposals for the identified areas are not yet available and are subject to further discussion with landowners and others. In the meantime, the safeguarding of these areas of land is a precautionary measure while the detailed scheme is developed and agreed with stakeholders.
268. However, Policy EE13 is not clear about what is meant by safeguarded land and how the policy relates to existing or committed development within the safeguarded area, and clarification is required about the Environment Agency's on-going consultation. To ensure that the Plan is justified and effective, modification of the policy is required. As published for consultation, **MM49** sought to provide clarification about the Environment Agency's consultation and how the circumstances in Thorpe Park would be addressed.
269. Subsequently, it has become clear that 4 out of the 5 safeguarded areas within the park can be removed from the safeguarding zone and that the extent of the land within the 5<sup>th</sup> area can be reduced. A Statement of Common Ground has been agreed between the Council, the Environment Agency and on behalf of the owners of Thorpe Park that confirms that some of the text in **MM49** is no longer required and that any loss of the approved flood compensation scheme within the park as a result of the River Thames Scheme construction works would be re-provided in agreement with the Council. For soundness, I have amended **MM49** to reflect the up-to-date position and am satisfied that these changes do not materially alter the meaning or effect of the policy or undermine the consultation or sustainability appraisal processes that have informed the Plan.
270. Subject to these changes, I consider that the Plan lays down a justified and effective framework for the Council, Environment Agency, representatives of

local communities and all other stakeholders to continue working jointly to manage flood risk in the borough and surrounding areas. Consequential changes to the Policies Map in accordance with the plan that accompanies the Statement of Common Ground will be required

271. Policy EE14 deals with proposals for extensions, alterations and replacement buildings in the Green Belt. NPPF 2019 applies to the determination of planning applications and therefore, for effectiveness, the policy and supporting text should be modified as set out in **MM50** to align more closely with the new national planning policy, ensure correct and accurate wording, and avoid unnecessary prescription in the policy.
272. Also, for one or more of the above reasons, **MM51**, **MM52**, **MM53** and **MM54** are necessary for the soundness of Policies EE15 (Re-use of Buildings in the Green Belt), EE16 (Outdoor Sport and Recreation in the Green Belt), EE18 (Engineering Operations in the Green Belt) and EE19 (Change of Use of Land in the Green Belt). Unlike the extant local plan, this Plan does not include a specific policy for Major Developed Sites in the Green Belt. Nonetheless it is sound because its policy framework recognises all previously developed land in the Green Belt and gives flexibility for the consideration of any proposed development on its merits.

#### *Existing Open Space and Playing Pitches*

273. The Plan sets out justified policies for the protection, maintenance and enhancement of open space to contribute to the health and well-being of local communities. For clarity and effectiveness, paragraph 6.76 should be amended to refer to Policy SL25 which deals with this matter (**MM43**).
274. In accordance with Policy SL28, the loss or displacement of existing playing pitches and/or playing fields to other uses will not be permitted unless one of three criteria can be met. Criterion c) requires a replacement playing pitch of an equal quantity and quality or higher standard in at least an equally accessible location to serve the same local community, and that this will be guided by the Council's Playing Pitch Strategy.
275. The policy goes on to state that in exceptional circumstances, where it has been demonstrated that on-site provision is not feasible or viable, off-site financial contributions may be considered acceptable. The Council considers that this approach may enable a better balance between quantity and quality of provision to be achieved in individual cases. The exceptional circumstances would need to demonstrate that any departure from national planning policy on this matter is justified. On this basis, I am satisfied that Policy SL28 is sound.

#### *Conclusion*

276. Subject to the modifications recommended above, the Plan's policies for enhancing the borough's environment and protecting its open spaces are sound.

**Issue 8: Has the key infrastructure (including improvements) that is required for sustainable development in accordance with the Plan been identified, and is it likely to be delivered in a timely manner?**

*The A320 and M25*

277. As considered in Issue 2, the A320 is a fundamental element of the spatial strategy and its capacity to accommodate traffic growth during the Plan period is a critical issue. In order to demonstrate the soundness of the strategy and to address the concerns of Highways England about the potential effects on the M25, the evidence submitted with the Plan has subsequently been updated and supplemented. It takes account of revised assumptions, the latest information on forecast trip rates, and a sensitivity test to examine a worst-case scenario of traffic growth.
278. The updated and additional evidence, including sustainability appraisal, confirms that some of the Plan's site allocations have the potential for a severe traffic impact on the A320 without any mitigation. But it shows that with implementation of the proposed mitigation, the impact is likely to be reduced so that a sufficient level of service on the A320 and other roads that serve the Plan's allocated sites can be secured, and that the impact on air quality will be neutral.
279. The additional work has also explored and clarified the likely effects on the M25. It has identified the potential impact on M25 Junction 11 and on A317/A320 approaches to the junction, and a scheme that will provide satisfactory mitigation (which forms a part of the A320 scheme) has been agreed with Highways England. And while further evaluation of the highways implications of the planned growth will be necessary when detailed proposals for development are submitted for planning permission, the current evidence is fit for purpose and the conclusions are robust.
280. It should also be noted that implementation of the measures to reduce reliance on car travel, as proposed in the Plan and the Local Transport Strategy, can be expected to lead to a further decrease in the highways impact of the proposed development in the Plan period. Also, the A320 scheme itself will have environmental benefits in providing a safe and balanced level of provision for all road users, facilitating greater use of the rail network through the development of Longcross Garden Village, and enabling key-worker housing development on the St Peter's Hospital allocation which may reduce the need to travel.
281. Significant progress has been made towards delivery of the A320 scheme. The Council and Surrey County Council have worked together as a priority to co-ordinate delivery of the full scheme of improvement works required along the A320 corridor, with an estimated cost of £44M. A funding bid for the scheme (A320 North of Woking scheme) was submitted to the Housing Infrastructure Fund in April 2019, with a programme for completion of the works in March 2024. It was predicated on a clawback of 25% of the total cost from the A320-dependent sites, therefore £11M. The bid was approved in March this year.
282. Delivery of about 50% of the Plan's housing target is dependent on the necessary mitigation work on the A320 being completed. While this is a significant challenge, on the balance of the current evidence I consider that it

is achievable, viable and deliverable. An update of the viability assessment shows significant surpluses in residual land values that will enable financial contributions to be clawed back towards the cost of the scheme. And in principle, additional funding could be secured through a Community Infrastructure Levy which is being brought forward by the Council.

283. Furthermore, at the hearing in November 2019 it was confirmed that funding and other arrangements were in place to commence detailed design, preparation and initial implementation works for the scheme, pending confirmation of the decision on the bid to the Housing Infrastructure Fund. Also, there are indications that early delivery of parts of the scheme may be achieved by direct provision by developers.
284. A detailed scheme design and programme of work was not available in time for the examination and therefore information about any requirement for land acquisition and the way in which the more complex junctions on the route will be re-designed is not before me. Thus, there are uncertainties at this stage, but on balance they are insufficient to conclude that implementation of the Plan is fundamentally at risk.
285. Also, while the timetable to deliver the scheme has slipped against the programme in the funding bid, it is insufficient to conclude that there is likely to be significant delay in completing the scheme. And there is no substantive evidence of any fundamental environmental or other constraints on its implementation. Overall, I am satisfied that the risk to the spatial strategy that arises from its dependence on improvements to the A320 has been robustly assessed at an appropriate level and that, subject to the recommended main modifications, the Plan is sound.
286. For a justified and effective Plan, it needs to be clear that development of specified sites will be subject to the delivery of the necessary mitigation on the A320, and this requires modifications to Policy SD3, as set out in **MM19**, together with modifications to the site-specific policies that are dealt with in other parts of the report. And as submitted, Policy SD4 indicates that land may be safeguarded on the Policies Map for transport infrastructure, but to clarify the approach to delivery of the A320 scheme, the policy needs to confirm that planning permission will be refused for any development that would compromise the delivery of the mitigation works (**MM20**).
287. As referred to above, the Council and Surrey County Council agree that it may be acceptable for some development that will give rise to increased traffic on the A320 to come forward before the mitigation scheme has been completed, in order to meet the identified needs in a timely manner; they also agree that the potential impact on the safe and effective operation of the highway network will be considered on a case by case basis, albeit by working with groups of developers where necessary for effectiveness. I am satisfied that this is a practical and justified measure that needs to be reflected in a modification to paragraph 5.40 of the Plan, as set out in **MM12**. For clarity, I have made a minor amendment to the wording of MM12 as published for consultation, to replace 'brought forward' by 'delivered'.
288. Also, for consistency and clarification, Policy SD6 should be modified to set out the limited circumstances in which planning permission may be granted for

development that is dependent on the provision of critical infrastructure before that infrastructure (or a phase of it) has been completed (**MM21**). This may entail the use of Grampian conditions restricting full or partial occupation of the development prior to completion of the critical infrastructure.

289. The above approach is a reasonable one that will allow development to progress in parallel with construction of the necessary infrastructure, informed by substantive evidence of the timescale for delivery of the infrastructure. However, MM21 as published for consultation should be amended to clarify that 'other developments outside Runnymede' refers to committed development which has a material impact on the infrastructure improvement required. I have altered the schedule of MMs accordingly.
290. Taken as a whole, I am satisfied that MM12, MM19, MM20, MM21 and the modifications to the individual site allocation policies provide reasonable clarity and flexibility for decision making on individual schemes when a planning application is submitted, and they are likely to be effective. The implications of this approach for Longcross Garden Village have been considered in Issue 3 above. However, for consistency across the policies and for clarity that development will not be held back if it is not necessary to do so, the references to 'phasing' in paragraph 5.40 and in the 4<sup>th</sup> column of Policy SD3 should be replaced by 'timing'. Therefore, I have amended MM12 and MM19 as published for consultation.
291. Overall, I am satisfied that there are reasonable prospects that the critical transport infrastructure for sustainable development of the borough over the Plan period will be delivered in a timely manner. While it is too soon to assess the implications of the coronavirus pandemic for delivery of major infrastructure, housing and other development in the borough, this is not a good enough reason to change the Plan's strategy. It also does not indicate that the Plan, when considered in the round, is lacking in flexibility such that it is unsound.

#### *SANG*

292. As considered in Issue 2 above, the provision of adequate SANG in a timely manner is critically important for delivery of the Plan. The Council has worked closely with Natural England to identify suitable provision that will come forward over the Plan period. Based on the up-to-date evidence, the overall requirement for SANG is likely to be met. The modifications of Policy SD6, Policy EE10 and the monitoring framework (**MM21**, **MM47** and **MM62**), referred to above, clarify the way in which proposals for development that are dependent on the provision of SANG will be considered and monitored. Overall, subject to these modifications, the Plan's proposals for meeting the requirement for SANG are sound.

#### *Provision for Other Infrastructure Needs*

293. The Plan is informed by substantive, proportionate and credible evidence about the key infrastructure requirements such as water, drainage, other transport needs, education, health, community and recreational facilities, and Green Infrastructure. Timescales for delivery and funding mechanisms are also identified in the supporting evidence. Where necessary, site-specific requirements are clearly identified in the relevant policies, and over-arching

policies such as Policy SD5 lay down a clear, justified and effective framework for planning and managing the overall provision of infrastructure to meet needs.

294. Policy SD4 addresses how active and sustainable travel in the borough will be supported and enhanced, including through implementing the objectives and strategies of the Surrey Local Transport Plan, the third iteration of which was published in 2016. The Council has commenced work on a local transport strategy which will support sustainable growth coming forward through the Plan and will help to deliver the vision and aims of County-wide planning for active and sustainable travel. For clarity and effectiveness, updated information should be included in the Plan about the borough's local transport strategy. **MM20** expands the supporting text to provide this context.
295. While the Plan does not make site-specific provision to meet all the needs identified in the Infrastructure Delivery Schedule, I have no reason to conclude that it is unsound in this respect. There is adequate evidence that the Council is working with its partners in these matters to help provide tailored solutions that will meet specific needs in a timely way. In the case of school provision, there is no evidence of any insuperable difficulties in planning to meet the expected need.
296. Adequacy of parking provision in new development and the effect of increased on-street parking on the safety of highway users is an issue that is recognised by the Council, and a supplementary planning document is in preparation. In the meantime, I am satisfied that Policy SD5 provides a clear, overarching framework to consider the needs of all highway users.
297. Improvement of facilities for outdoor sports will be necessary over the Plan period. A significant contribution to meeting these needs will be made in Longcross Garden Village in accordance with Policy SD10, and community use agreements, improved maintenance and other detailed measures set out in the Playing Pitch Strategy are directed towards meeting the balance of the requirements.
298. Taking all the evidence into account, and subject to MM20 above, the Plan's provisions for other infrastructure needs are sound.

### *Conclusion*

299. Provided that the main modifications recommended above are made, I am satisfied that the key infrastructure (including improvements) that is required for sustainable development in accordance with the Plan has been identified, and that it is likely to be delivered in a timely manner.

**Issue 9 – Does the Plan make provision for an adequate supply of deliverable and developable sites to meet the housing requirement? Are there reasonable prospects that a 5-year supply of deliverable sites will be maintained?**

### *Overall Supply*

300. I have concluded in Issue 2 above that the housing requirement for the Plan period is 7,507 dwellings. Updated information on the supply was provided

during the examination, with a base date of 1 April 2019. This shows a total supply of 7,920, thus exceeding the requirement. While it indicates that a greater level of development is likely to come forward in certain parts of the borough, compared with the level shown in Policy SD2 of the submitted Plan, the increases are relatively small and there is insufficient reason to conclude that they may have a detrimental impact on these areas or the borough as a whole.

301. The components of this supply and the underpinning assumptions have been justified by the Council and tested robustly during the examination. The capacity of the site allocations, which are expressed as minimum figures, and their lead-in times have been systematically and robustly assessed, with close working between the Council, landowners and developers to update and refine the supply figures. The progress that has been made in bringing forward a number of these sites since the Plan was submitted supports the deliverability of the estimated capacity. The capacity of the town centre Opportunity Areas has also been robustly assessed, and two of them are under the control of the Council that is intent on developing them in the Plan period.
302. Other sites identified in the Strategic Land Availability Assessment that are not allocated and do not have planning permission are nonetheless likely to come forward in the Plan period, given the evidence that they are developable and deliverable, and their estimated capacity is justified. The supply also includes a contribution from the regeneration of existing Council estates, which is being pursued actively. Based on the evidence provided, including during the examination, the estimated yield from this source during the Plan period is realistic and achievable.
303. A lapse rate of 15% has been applied to existing commitments if development has not been commenced. This rate is based on local evidence of non-implementation of permissions and is justified. Given the considerations in paragraph 301 above, there is insufficient reason to apply a lapse rate to the site allocations or Opportunity Areas.
304. The supply includes modest allowances for small windfalls (1-4 net dwellings) and yields from prior approvals. The windfalls estimate is based on the steady contribution that they have made to the supply in recent years (an average of 21 dwellings per year between 2012 and 2017) and there is compelling evidence that supports continuation of this trend, albeit at a decreased rate (a reduction of 15%).
305. Given that the Council is preparing to make an Article 4 Direction to restrict permitted development rights within the Strategic Employment Areas for changes of use from employment to residential, and bearing in mind that prior approvals have made a significant contribution to the supply in the early years of the Plan period, the allowance that is included in the future supply is modest and justified.
306. The estimated supply from 2018/2019 onwards factors in a contribution that is likely to be made to the stock of Class C3 dwellings by new Class C2 accommodation for older people. This is reasonable and it is consistent with the approach in the Government's Housing Delivery Test Measurement Rule Book (a ratio of 1:1.8). Based on local evidence from a survey of completed

Class C2 developments for older people, it has been assumed that a ratio of 1:3 was achieved in the first three years of the Plan period. In the circumstances it is justified to make that allowance. A reasonable contribution to the Class C3 supply from new accommodation for students has been included in the overall supply, based on the Rule Book and having regard to the way in which development for student housing is provided in the borough.

307. Taking all of the above into account, together with my conclusion in Issue 8 on delivery of the essential mitigation works on the A320, I am satisfied that the overall supply of housing land for the Plan period has been robustly assessed and is justified, developable, viable and capable of delivering the housing requirement.
308. For soundness, paragraph 5.38 and Tables 1 and 2 of Policy SD2 should be modified to take account of 1 April 2019 base date information, and this will be achieved by **MM14**, **MM17** and **MM18**. For clarity, I have amended MM14 by inserting a footnote that confirms the base date of the figures in Table 1 and the way in which the contribution from Class C2 older people's accommodation to housing provision has been calculated.
309. Also, **MM9**, **MM16** and the relevant part of **MM13** are required to update the minimum net additional housing provision for the remainder of the Plan period and the capacity to meet it. **MM62** makes the consequential changes to the monitoring framework. For clarity, the Plan should also include the overall housing trajectory and affordable housing trajectory expected over the Plan period (**MM11**). Appendix B of the Plan, which provides information on Strategic Land Availability Assessment sites that are included in the supply numbers in Table 2, also needs to be updated for accuracy and completeness (**MM63**).

#### *Housing Trajectory and 5-year Supply*

310. I set out firstly my findings on the evidence about the housing trajectory and 5-year housing land supply which pre-dates the coronavirus pandemic. The trajectory for delivery of housing was revised to take account of the most up-to-date evidence, including about delivery of the A320 scheme, that was available for the Stage 3 hearing in November 2019.
311. In considering the 5-year supply, it should be borne in mind that the revised Strategic Highways Assessment Report (dated June 2019) does not identify a point at which the level of planned development would have a problematic impact on the A320, prior to completion of the mitigation works. Some development is already committed, and as referred to above, there is agreement between the Council, Surrey County Council and Highways England that some further development can come forward in parallel with the works on the A320, subject to detailed transport assessments at the planning application stage.
312. Furthermore, since the Plan was correctly prepared in accordance with the NPPF 2012 definition of a deliverable site, it would not be appropriate to measure it against the NPPF 2019 definition, whether the sites currently meet it or not. I return below to the possible effect on the 5-year supply position in the future.

313. The Council has estimated that some 3,517 dwelling completions can be delivered over the 5-year period commencing 2019/2020, at an average of 703 dwellings per year. Based on a 20% buffer in the supply, to help address the shortfall in delivery since 2015 compared with the housing requirement, this provides for a 5-year land supply (5.07 years).
314. The supply includes dwellings that have planning permission and are able to be delivered without full completion of the A320 works. The balance of the supply is made up from sites that are dependent on completion of the A320 works and amounts to 915 dwellings.
315. Of this, about 590 dwellings are expected to be delivered at Longcross Garden Village. As referred to in Issue 3, this would be a 'trade-off' in traffic impact terms, given that delivery of a significant proportion, or potentially all, of the remainder of the employment floorspace at Longcross which has permission, is not expected before March 2024. Also, 150 dwellings at Chertsey Bittams D are expected to come forward as a redevelopment of an existing employment site.
316. Approval of planning applications for these components of the supply will be subject to satisfactory transport assessments for the sites. Nonetheless, on the balance of all the evidence before the examination, and assuming a favourable housing market, there can be reasonable confidence about their deliverability, and it is justified to include them in the trajectory.
317. The remainder of 5-year supply, a balance of 175 dwellings, assumes that they will be completed on some of the A320-dependent sites by 2023/2024, although occupation of these developments will be restricted by planning conditions until the necessary mitigation on the A320 has been delivered. Taking account of the normally strong housing market in the borough, the availability of the sites and the commitment of Surrey County Council and the Council to completion of the A320 scheme, this is a reasonable assumption and it does not put the Plan's delivery at significant risk.
318. Overall, the estimated 5-year supply is soundly based on a robust assessment of the deliverability of the sites and the need to ensure that the impact on the A320 will be acceptable. It seeks to address the shortfall in delivery that has accrued in the period up to 2019 by meeting and exceeding the pro-rata housing requirement for the first 9 years of the Plan period. This is a positive approach that front-loads the supply for the remainder of the Plan period. And the step change in expected delivery is consistent with the views of developers about the pent-up demand for new housing in the borough.
319. However, as referred to above, it is too early to assess the implications of the coronavirus pandemic for the economy, and particularly for housing delivery in Runnymede; accordingly, there can be less confidence now about prospects for maintaining a 5-year housing land supply as defined in national policy, and bearing in mind that for development management purposes, deliverability of a site will be considered in the terms of the NPPF 2019 definition.
320. Nonetheless, taking all the findings of the examination into account, this does not make the Plan unsound. I have set out above (as summarised in paragraph 136) why it would not be justified to release additional land from the Green Belt in this Plan, and this outweighs the case for seeking to

augment the 5-year land supply position. Even if it were justified, it would be unlikely to increase certainty about housing delivery in the current circumstances.

321. The review of plans at least every 5 years is a legal requirement, and the Council made clear during the examination that it expects the review to be underway by 2024. However, given current uncertainties about the path to economic recovery, together with the Council's aim as expressed in MM7 to enable a future plan to be better coordinated and integrated with plans prepared by its neighbours (see also paragraphs 39-41 above), a clear commitment and timescale for review should be set out in the Plan for its on-going effectiveness. Accordingly, I have amended **MM7** as published for consultation.

### *Conclusion*

322. Subject to the MMs recommended above, the Plan makes provision for an adequate supply of deliverable and developable sites to meet the housing requirement. There can be less confidence that a 5-year supply of deliverable sites will be maintained, but for the reasons set out above, this does not make the Plan unsound.

### **Public Sector Equality Duty**

323. In carrying out the examination I have had due regard to the aims expressed in Section 149(1) of the Equality Act 2010. This has included my consideration of several matters during the examination including the provision of accommodation for Gypsies, Travellers and Travelling Showpeople, accessible and adaptable housing and inclusive design to address needs of persons or groups with protected characteristics that are expected to arise over the Plan period. In this light, I conclude that the Plan provides for fair and equal treatment of Runnymede's communities.

324. The Council has carried out equality impact assessments of the Plan during the stages of its preparation and has also assessed the proposed main modifications. This work indicates that the overall effect of the Plan's policies on persons or groups with protected characteristics under the Equality Act is positive or neutral and that no mitigation is required. The Plan will be monitored and reviewed in accordance with the legal duty and this will enable any need for changes to the Plan, in order to address equality matters, to be identified and carried out.

### **Assessment of Legal Compliance**

325. My examination of the legal compliance of the Plan is summarised below. I conclude that the Plan satisfies all the legal requirements.

326. The Plan has been prepared in accordance with the Council's Local Development Scheme (March 2018).

327. The Regulation 22 Statement of Consultation (July 2018) sets out how public consultation has taken place during the preparation of the Plan and how the Council has taken the representations into account. The evidence shows that adequate opportunities have been provided for the borough's residents,

workers and other interested parties to express their views on the Plan, and subsequently on the proposed MMs. I am satisfied that public consultation has been carried out in compliance with the Council's Statement of Community Involvement (December 2014).

328. Sustainability appraisal has been carried out as an iterative process at each stage of the Plan's preparation and on the proposed MMs and it has been reported and made available for consultation in accordance with the legislative requirements. In undertaking this work, account was also taken of the advice in the Planning Practice Guidance. It culminated in the Sustainability Appraisal Report (January 2018), the Addendum Report (May 2018) and the Main Modifications Sustainability Appraisal Screening Report (December 2019).
329. This work has correctly focused on the environmental, economic and social effects of the Plan that are likely to be significant and has assessed them at a level of detail that is appropriate for the Plan, given its purpose, content and specificity.
330. The sustainability appraisal framework and the content of the Sustainability Appraisal report (taken as a whole) has provided relevant and proportionate baseline information and assessment of the way in which this is likely to change with or without the Plan, using a clear, logical and consistently applied scoring matrix to assess the significance of the likely effects (including in-combination or uncertain effects). The report also identifies the measures that are recommended to mitigate potential significant adverse effects, including uncertain effects, and it provides an outline of the reasons for selecting the alternatives that were considered in the light of others available.
331. The alternatives considered were reasonable, realistic, sufficiently distinct from one another, and deliverable. They were developed through the issues and options stage of the Plan's preparation and tested through the sustainability appraisal process. Clear and adequate reasons have been given for the selection of the preferred strategy. I have found no substantive evidence of any flaw or error in the sustainability appraisal process, including its reporting, that materially undermined its purpose in informing the Plan. I am satisfied that sustainability appraisal of the Plan was adequate.
332. The Habitats Regulations Assessment Screening and Appropriate Assessment Report (April 2018), together with the report on the effects of the proposed MMs, makes clear that a full assessment of the likely significant effects of the Plan on internationally designated sites has been undertaken throughout the stages of plan preparation, in accordance with the statutory requirements. Particular attention has been paid to the effects of the proposed development of Longcross Garden Village on Thames Basin Heaths Special Protection Area and Thursley, Ash, Pirbright and Chobham Special Area of Conservation.
333. The Habitats Regulations Assessment report makes clear that the Plan may have some negative impacts on internationally designated sites which require mitigation, and that this mitigation is secured through the Plan, as modified, at an appropriate level for a strategic plan. On this basis, the Plan will not have adverse effects on the integrity of the internationally designated sites either alone, or in combination with other plans and projects. Natural England is satisfied that the Habitats Regulations Assessment is adequate.

334. Read as a whole, the Plan includes policies designed to secure that the development and use of land in the borough contribute to the mitigation of, and adaptation to, climate change. This includes the overall spatial strategy and site allocation policies that seek to direct development to the most sustainable locations in the borough, and policies to reduce and minimise the risks from flooding, reduce greenhouse gas emissions, avoid habitat fragmentation, improve water quality and efficiency, and promote the use of renewable and low carbon energy. For example, I refer to Policies SD2, SD4, SD8, SD9, SL1, EE2, EE9, EE11-EE13.

335. The Plan as submitted does not contain a list of the saved policies in the Runnymede Borough Local Plan 2001 (Second Alteration) (the extant local plan) that will be replaced or deleted upon the adoption of the Runnymede 2030 Local Plan. This is rectified by **MM65**.

336. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations (as amended).

## **Overall Conclusion and Recommendation**

337. The Plan has some deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

338. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix, the Runnymede 2030 Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

*Mary Travers*

Inspector

This report is accompanied by an Appendix containing the Main Modifications.